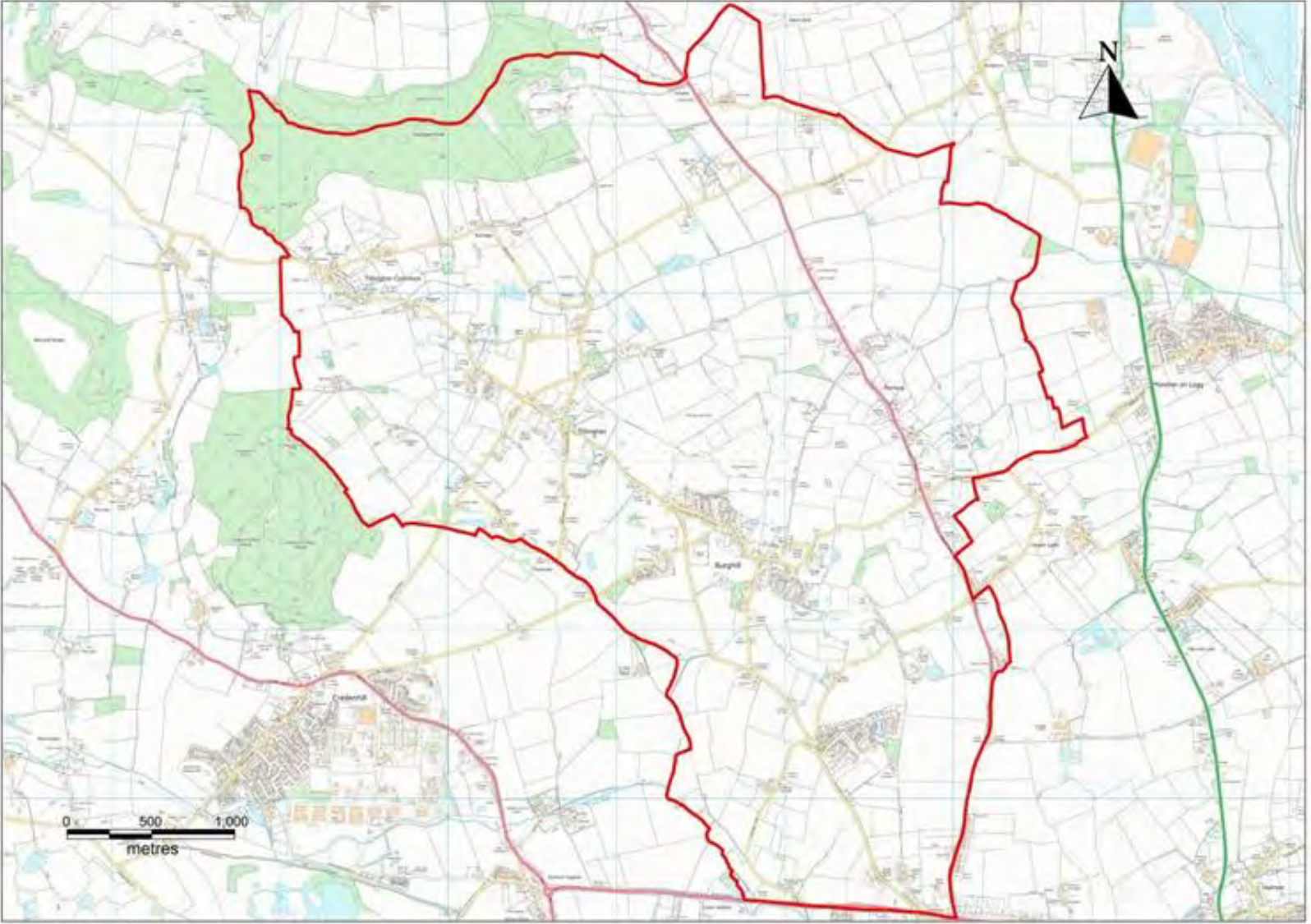

Burghill Parish Neighbourhood Development Plan 2011 - 2031



Consultation Statement December 2017

Map 1 Burghill Neighbourhood Area



1.0 Introduction and Background

- 1.1 This Consultation Statement has been prepared in accordance with The Neighbourhood Planning (General) Regulations 2012 (SI No. 637) Part 5 Paragraph 15 (2)¹ **which defines a “consultation statement” as a document which:**
- (a) contains details of the persons and bodies who were consulted about the proposed neighbourhood development plan;*
 - (b) explains how they were consulted;*
 - (c) summarises the main issues and concerns raised by the persons consulted; and*
 - (d) describes how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan.*
- 1.2 The Burghill Parish Council (BPC) had for some time been aware of the Localism Act of 2011 and the option of preparing and consulting upon a Neighbourhood Development Plan (NDP). In early 2013 a presentation had been given by the Herefordshire Council (HC) to the BPC explaining the available options for the making of a NDP, but no formal decision had been made by the BPC to embark on this specific task. This decision to make a neighbourhood development plan was not made until the BPC meeting on the 10 July 2013. At this meeting the BPC decided to form a steering group, made up of both BPC members and other interested parishioners, to commence the preparation of a NDP.
- 1.3 In July 2013, the Parish Council applied to Herefordshire Council for designation as a neighbourhood area. The area was formally designated by Herefordshire Council in September 2013 and is shown in Map 1 on Page 2.
- 1.4 Concerned that this steering group should be representative of all areas of the Parish, at the two initial meetings for the general public there was an open invitation for anyone who was interested to get involved and this wide representation was actively sought. There was a further invitation at the Options Days for any interested persons to get involved.
- 1.5 The consultation process has included public meetings, an extensive questionnaire, (which was delivered to every household) and Options Days with the opportunity to submit comments. Fliers were distributed to every household in the parish on 3 occasions and regular use was made of the community Parish Magazine, which again is delivered to every household, for frequent updates. Regular use was also made of the community website for these updates, as well as feedback from the consultation process.
- 1.6 Since the start of the process a NDP progress report has been presented at every parish council meeting. All these meetings are open to the public and at all meetings there is a 10-minute session for members of the public to present a matter of their choice to the PC for discussion.

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

- 1.7 This Consultation Statement lists the various stages in the consultation process and includes references to all the events and information that it comprised. It also contains feedback from the public in the form of analysis of the questionnaire, analysis of comments from the Options Days and the comments received at the Regulation 14 stage.
- 1.8 This document also includes the consultation undertaken by the Parish Council following the Regulation 16 consultation carried out by Herefordshire Council between 13th July 2016 and 24th August 2016, and **the Council's subsequent decision not to progress the Burghill Neighbourhood Development Plan to Examination.**

2.0 Draft Neighbourhood Development Plan and Informal Public Consultation

- 2.1 In September 2013, an article appeared in the Community Magazine explaining what a Neighbourhood Plan is. The Community Magazine is distributed, free of charge to every household in the parish. The article is included in Appendix 1.
- 2.2 In October 2013, a further insert was included in the Community Magazine **to draw residents' attention to a meeting to be held on 26th November 2013** to explain about the NDP. A copy of the insert is included at Appendix 2.
- 2.3 A public meeting was held 26th November 2013 at 7pm in the Simpson Hall in Burghill, to explain the nature of a Neighbourhood Plan, foster interest in the Plan and make a note of initial concerns. Notes of this meeting are included in Appendix 3.
- 2.4 In January 2014, a press release was issued, and an updating article appeared in the Community Magazine and on the parish website (www.burghill-web.co.uk). The press release is included at Appendix 4.
- 2.5 In February 2014 a further article was published in the Community magazine bringing residents attention to a further open meeting to be held on 4th March 2014. The article is included in Appendix 5. A flyer was distributed to all households in the parish at the end of February 2014, and posters were put on the Parish noticeboards advertising the meeting. The flyer/poster is included at Appendix 6.
- 2.6 The public meeting to raise awareness of the Neighbourhood Development Plan was held. It was attended by 115 residents and two further members were recruited to the Steering Group. Notes of the meeting are included at Appendix 7.
- 2.7 The Steering Group considered that a meeting was required with the Head of the local primary school - Burghill Academy. The meeting was held on 12th March 2014, the notes of this meeting are included at Appendix 8. **In addition, a presentation was given by the Steering Group to the school's Governing Body about the Neighbourhood Plan on 31st March 2014.** The response from Burghill Academy is included at Appendix 9.
- 2.8 In April 2014, an insert was included in the Community Magazine bringing the forthcoming questionnaire to the attention of residents. This is included at Appendix 10.
- 2.9 The questionnaires were distributed to every household in the Parish and to local businesses. A prize winning draw was used to encourage wider participation. In addition, to the main questionnaire, site development questionnaires were attached to elicit potential development sites. A copy of the questionnaire is included at Appendix 11.
- 2.10 The questionnaire responses were analysed by Gloucester Rural Community Council (GRCC) who produced a report for the Parish Council. This is submitted alongside this Consultation Statement.

- 2.11 In June, July and October 2014, updates were included in the Community Magazine and on the Burghill Community website. These are included at Appendix 12, 13 and 14 respectively.
- 2.12 The Steering Group were planning on holding a series of Options Days to display update the community on progress since the questionnaire and allow residents to comment on the information provided. Flyers were delivered to every household, posters were erected on the parish noticeboards and the website was updated. The Flyer/poster is included at Appendix 15.
- 2.13 The Options Days were held Burghill Village Hall on 15th and 16th November 2014. There were several information boards around the room displaying the following information:
- Vision and Objectives. (Appendix 16)
 - Development sites that came forward from the questionnaires (Appendix 18)
- 2.14 Those attending had the opportunity comment on the Vision and Objectives (Appendix 17) and also on settlement boundaries. (Appendix 19)
- 2.15 An information sheet (Appendix 20) was given to all attending explaining the next stages in the Neighbourhood Development Plan. This was also printed in the December/January edition of the parish magazine.
- 2.16 Copies of the questionnaire analysis by GRCC were available for consultation and parts of this were on display. (See Appendix 7 in Burghill Neighbourhood Development Plan for the rating of sites and analysis of Options Days returns).
- 2.17 The opportunity was also taken to ask whether any other parishioners would like to become involved in the process. (Appendix 21).
- 2.18 Appendix 22 includes photos of the Options Days event.
- 2.19 The responses from the Options Days event were analysed between January and March 2015. This information fed into the formulation of the draft plan and policies.
- 2.20 In May 2015, an update was included in the Community Magazine informing parishioners of changes following the Examination in Public of the **Herefordshire Core Strategy, and of the Parish Council's decision to employ** a firm of consultants to aid with the drafting of the Burghill Neighbourhood Development Plan. A copy of the update is included as Appendix 23.
- 2.21 A further update on the progress of the Burghill Neighbourhood Development Plan was included in the August 2015 edition of the Community Magazine. A copy of the update is included as Appendix 24.
- 2.22 At its meeting on the 18 November 2015 the Burghill Parish Council approved the second draft of the Burghill Neighbourhood Development Plan (BNDP). The Draft BNDP was sent to the Herefordshire Council (HC) for its first overview and Strategic Environmental Assessment. The PC arranged for the document to be available on both the Burghill and Tillington Community Website at:

www.burghill-web.co.uk

and also on the Burghill Parish Council web site at:

www.burghillparishcouncil.org

- 2.23 Hard copies of the draft were available to view at the Simpson Hall during the CAP sessions on a Wednesday morning starting on December 2nd 2015. However, comments on the draft were not accepted until the official deposit period starts.
- 2.24 An update was included in the December edition of the Community Magazine to inform residents. This is included at Appendix 25.

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

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

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

- (a) publicise, in a manner that is likely to bring it to the attention of people who live, work or carry on business in the neighbourhood area*
 - (i) details of the proposals for a neighbourhood development plan;*
 - (ii) details of where and when the proposals for a neighbourhood development plan may be inspected;*
 - (iii) details of how to make representations; and*
 - (iv) the date by which those representations must be received, being not less than 6 weeks from the date on which the draft proposal is first publicised;*
- (b) consult any consultation body referred to in paragraph 1 of Schedule 1 whose interests the qualifying body considers may be affected by the proposals for a neighbourhood development plan; and*
- (c) send a copy of the proposals for a neighbourhood development plan to the local planning authority.*

- 3.2 The Burghill Draft Neighbourhood Development Plan was published for 6 weeks formal Public Consultation from 20th January 2016 to 2nd March 2016.
- 3.3 The Burghill Parish Council invited comments on the draft development plan. Comments forms are available at the Simpson Hall, Burghill during the CAP sessions on Wednesday mornings during the consultation period and on the Burghill Parish websites at:

www.burghillparishcouncil.org

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

www.burghill-web.co.uk

- 3.4 An e-mail or letter was sent to all Consultation Bodies, including neighbouring Parish Councils, providing information about the consultation dates and the locations where the Draft Plan and accompanying documents could be viewed and downloaded.
- 3.6 The consultation process was also promoted in the following ways:
- Update in the Community Magazine
 - Update on the Parish website.
 - Flyer delivered to all households

- 3.8 A copy of the Draft Neighbourhood Plan was submitted to Herefordshire Council.
- 3.9 The list of consultation bodies, representation form, flyer, press release and screenshots of the websites are included at Appendix 26.
- 3.10 A further article was published in the Parish Magazine in February 2017 reminding residents about the Regulation 14 consultation. (Appendix 27)

4.0 Consultation Responses to the Draft Neighbourhood Plan for the Regulation 14 Consultation 25th January 2016 – 8th March 2016

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

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

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

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

Ref. No.	Consultee Name	Page No.	Para. No.	Policy No.	Comments received	Suggested Amendments to NP
3	Historic England	General comment			<p>Historic England are supportive of the Vision and Objectives set out in the Plan and the content of the document, particularly its emphasis on local distinctiveness including undesignated heritage assets and the maintenance of historic rural character.</p> <p>Overall the plan reads as a well-considered, concise and fit for purpose document which we consider takes a suitably proportionate approach to the historic environment of the Parish.</p> <p>Beyond those observations we have no further substantive comments to make on what Historic England considers is a good example of community led planning.</p>	Comments noted.
Herefordshire Council Service Providers Responses						
4a	Neighbourhood Planning			<p>B1</p> <p>First paragraph are there any allocated sites outside of the settlement boundaries? Point a) in the interests of flexibility in accordance to the NPPF it may be worth changing 'not exceeding' to 'approximately' unless there is a characterisation assessment for the areas that identify the need for the maximum density. Point f) – wording is slightly ambiguous as to whether the 15% is of the 35% affordable or 15% overall?</p> <p>B4</p> <p>Point d) and e) sound very similar and could be combined by adding after reconstruction in point e) 'or significant extension'</p> <p>B8</p>	<p>This Plan is well written with well researched / evidenced policies that have taken into account the requirements of the local community</p>	<p>Comments noted. This would not be in keeping with local wishes to keep to small housing developments.</p> <p>Comments noted. The Parish Council do not consider the wording to be ambiguous.</p> <p>Comments noted. The Parish Council consider that these are different issues.</p>

Ref. No.	Consultee Name	Page No.	Para. No.	Policy No.	Comments received	Suggested Amendments to NP
				B11	point e) it states the 'character of the village' but the policy seems to detail about the Parish as a whole, needs clarifying whether it is for the village or the parish.	Comments noted. Change 'village' to 'parish' .
				B13	it may be better to combine the two paragraphs, after 'uses. In the first paragraph continue from '...unless the following can be demonstrated...'	Comments noted. Policy B11 amended accordingly.
					Would be useful to number the paragraphs as there is so much information within the policy. First paragraph '...within Flood Zone 1 (low risk)' add 'where possible' after.	Comments noted and agreed. Policy B13 amended accordingly.
					Fourth paragraph add 'where possible' at the end Sixth paragraph, add 'where possible' at the end	
4b	Development Management				No comments received.	No changes required.
4c	Planning Policy	49		B1-B12 and B12-B14	All these policies are considered to be in conformity with the Herefordshire Core Strategy.	Comments noted.
		53		B9	The plan does not seem to take into account the Hereford Relief Road corridor that runs through the southern extremity of the Parish.	Comments noted. The NDP does not propose any sites in the vicinity of the relief road.
		53		B10	"New development which impacts adversely on the <u>openness</u> of these sites..." This would appear to confine protection to one special quality. The policy could be strengthened by protecting against development that affects <i>any</i> of the special qualities that make the green spaces significant.	Comments noted. Amend to 'openness of these sites, or any of the special qualities that make these spaces significant' .

Ref. No.	Consultee Name	Page No.	Para. No.	Policy No.	Comments received	Suggested Amendments to NP
				B11	<p>A lack of cohesion noted between the two opening paragraphs. The statement in the opening paragraph is not fully in conformity. It does not offer the flexibility for proposals to make alternative equivalent provisions elsewhere, or for them to replace facilities that are demonstrably unviable.</p> <p>However, the exception criteria (a and b) that follow do conform with Core Strategy policy SC1.</p> <p>It may give the policy a more localised flavour to perhaps list some existing community facilities to which this kind of protection should be given.</p>	<p>Comments noted. Amended as above.</p> <p>Comments noted. Village Hall and Educational facilities are specifically mentioned.</p>
4c		56		B13	<p>Suggested minor change to wording for clarity:</p> <p>"All development should be <u>preferentially</u> located within Flood Zone 1 (Low Risk) <u>where possible and in accordance</u> with National Planning Policy Guidance (NPPG) and Herefordshire Council's Core Strategy (Policy SD3- Sustainable water management <u>and water resources</u>). <u>It must also have regard to the Strategic Flood Risk Assessment (2009) for Herefordshire...</u>"</p>	Comments noted. Policy B13 amended accordingly.
4d	Transportation and Highways	Objective 11			We would consider the bus provision to the parish adequate for the demand. We would however, support the exploration of alternatives to provide transport.	Comments noted. No changes required.
		48		B8(i)	Please reword the policy to replace the word "acceptable" and replace with "complies with this plan's Objectives 8, and Policies B7 and encourages use of active travel modes."	Comments noted. B8(i) amended accordingly.

Ref. No.	Consultee Name	Page No.	Para. No.	Policy No.	Comments received	Suggested Amendments to NP
		Appendix 3: Burghill Parish Design Guidance: Infrastructure			<p>- Access roads within development sites shall be constructed to a minimum carriageway width of 6m plus combined cycleways and footways of 2.0m minimum width. –</p> <p>Please refer to the Highways Design Guidance (link: https://www.herefordshire.gov.uk/transport-and-highways/highways-and-new-development) We feel 6m on all developments would be unfeasible and we would ask that the design guidance matches our highway design guide.</p>	Comments noted. Bullet amended to read 'Access roads within development sites shall be constructed in accordance with Design Guidance contained in the Herefordshire Core Strategy.'
4e	Landscape / Archaeology/ Conservation				No comment received.	No changes required.
4f	Strategic Housing				No comment received.	No changes required.
4g	Economic Development				No comment received.	No changes required.
4h	Environmental Health	37		B1(d)	<p><u>Dust, noise pollution</u></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 or any new commercial or industrial development.</p> <p>Our recommendation is that this item be amended slightly to say (not located adjacent to noise <i>or nuisance</i> generating agricultural, industrial or commercial activities)</p>	<p>Comments noted. Policy B1(d) amended accordingly.</p> <p>Comments noted. Current activities at the site would not</p>

Ref. No.	Consultee Name	Page No.	Para. No.	Policy No.	Comments received	Suggested Amendments to NP
					<p>In principle we have no objections to the proposed sites at Map 2 Lower Burlington, sites 2B and 2D, Map 3 site 21.</p> <p>We have some reservations about the proposal in Map 4 for sites 10,22 and 25 due to the close proximity of Tillington Business Park, as the activities at the Business Park could impact on residential occupants on the proposed site (noise, nuisance, dust), depending on the planning restrictions and designated use of the Business Park site.</p> <p><u>Contaminated land</u> Sites 2B, 2D, 10, 22, 25 and White Roses: These sites have been historically used as orchards. By way of general advice I would mention that orchards can be subject to agricultural spraying practices which may, in some circumstances, lead to a legacy of contamination and any development should consider this.</p> <p>Site '2B and 'White Roses' The two sites are located in an area, which has historically been used for the quarrying of sand and clay operation and since 1986 has been classed as unknown filled ground (pit, quarry etc.)</p> <p>Sites identified as unknown filled ground can be associated with contaminative fill material. In practice, many sites identified through the historical mapping process as unknown filled ground are instances where hollows have been made level with natural material, have remained as unfilled 'hollows' or have filled through natural processes. However, there are some instances where the nature of the fill</p>	<p>lead to an expectation of these kinds of problems. We would expect any potential problems to be addressed at the planning stage.</p> <p>Comments noted. This advice should also be taken by HCC when Planning Applications for conversion of existing, redundant buildings to dwellings are considered. No changes required.</p> <p>Comments noted and a summary of points raised included from paragraph 6.1.26 onward in the NDP.</p>

Ref. No.	Consultee Name	Page No.	Para. No.	Policy No.	Comments received	Suggested Amendments to NP
					<p>is not inert and would require further investigation. Without any additional information it is not possible to comment further on this site. Any additional information you may be able to obtain will help in determining the exact nature of the site.</p> <p>Responsibility for securing safe development rests with the developer and/or landowner. It is incumbent on the developer and/or landowner to demonstrate that the proposed development is both safe and suitable for its intended use.</p> <p>The sites historic potentially contaminative use (former quarry) will require consideration prior to any development. I would recommend any application that is submitted should include, as a minimum, a 'desk top study' considering risk from contamination in accordance with BS10175:2011 so that the proposal can be fully considered. With adequate information it is likely a condition would be recommended.</p> <p>32 Site: Solar Farm Site Our records suggest that the proposed development located on a known closed landfill site (Winstow Pit, Burghill). Because of this it will be necessary for the applicant to undertake a site investigation to consider the risk from the landfill to the development. Therefore we would recommend a condition be appended to any planning approval to ensure the site is both safe and suitable for its intended use.</p>	Comments noted. Additional paragraph included as 6.8.4.
4i	Parks and Countryside				No comment received	No changes required.
4j	Waste				No comment received.	No changes required.

Ref. No.	Consultee Name	Page No.	Para. No.	Policy No.	Comments received	Suggested Amendments to NP
5	Herefordshire Council				<p>In response to the Burghill Parish Neighbourhood Development Plan 2011-31 Consultation Draft, Herefordshire Council owns the land shown hatched red on the attached plan and puts forward this land to be allocated within the Plan as land suitable for housing development during the plan period. The land is considered suitable for the following reasons:</p> <ul style="list-style-type: none"> • Its proximity and accessibility to the existing highway network • Its proximity to the existing urban area of Hereford City and all the public services that provides. • The massing of the development in this location will enable on and off site infrastructure to be delivered in a cost efficient manner and therefore improve the viability and deliverability of the development of this land for housing • The land is owned by Herefordshire Council who can secure vacant possession and ensure the land is made available for development at the earliest opportunity, thus ensuring the requirements of the Plan are achieved within the Plan period, subject to all necessary consents and market demand. <p>I would be grateful if you could acknowledge receipt of this email and if you require any further information then please contact me.</p>	This site (2a) was included in the site assessments carried out. The site did not score as favourably as others and as such was not brought forward as a site allocation.
6	Holmer & Shelwick PC				Holmer and Shelwick Parish Council have discussed the Neighbourhood Plan put forward by Burghill and Would like to fully endorse the plan.	Comments noted.

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

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

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

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

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

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

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

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

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

Ref No.	Page No.	Para. No.	Policy No.	Support/ Object/ Comment	Comments received	PC Comments	Suggested Amendments to NP
1	63	Map 3	Map 3	Comment	Settlement boundary near "The Chase" needs adjustment to include residential driveway.	Comments noted. Agreed.	Amend settlement boundary on proposals maps to include the residential driveway of "The Chase" .
2	Whole Doc	Whole Doc	All	Comment	A wide ranging submission relating to socio-economic matters which are not specific to an NDP. Nevertheless, it is an interesting perspective on village life, people movement, lifestyle changes, rural environment	Comments noted.	No change

Ref No.	Page No.	Para. No.	Policy No.	Support/ Object/ Comment	Comments received	PC Comments	Suggested Amendments to NP
					issues, isolation, community values and the general enhancement and well-being of parishioners both now and in the future.		
3	41	6.3	B6	Support		Comments noted and support welcomed.	No change
4	42	6.4	B6	Support		Comments noted and support welcomed.	No change
5				5	Deleted as duplicated with No 19		No change
6.1	44 & 55		B7 & B12	Comment	Policy No B7 and B12 refer to: Traffic Calming Measures” and speed bumps should not be employed.	The descriptions for traffic calming are purposely generic to allow for the detail to be worked up at a later date, allowing all appropriate measures to be considered.	No change
6.2	62		Map 2	Comment	Should the site to the west of the Tillington Road have been included in the NDP as it is now the subject of a planning application	The site was considered as in the “Site Assessments” process (Site 2E) . The site was a less favourable site as was not brought forward as an allocation in the NDP.	No change
7	All	All	All	Support		Comments noted and support welcomed.	
8	All	All	All	Support		Comments noted and support welcomed.	No change
9	All	All	All	Support	Appreciate all the work that has gone into this very thorough plan and we support the proposals	Comments noted and support welcomed.	No change
10.1	64	Site Nos 10 22 & 29	Map 4	Support	Support the potential development areas around Tillington which are within easy walking distance of facilities. It would be hoped that a	Comments noted and support welcomed. Hopefully, development proposals in	No change

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					pavement would be placed down to The Bell	Tillington will facilitate a future footway extension.	
10.2	63	Site No 21	Map 3	Object	Site 21 combined with the recently permitted site at Pye Finch is likely to cause traffic problems at the cross roads.	The development of Site 21 should enable highway improvements as part of any future proposals, improving the visibility splays at the junction to achieve relevant highway standards. See Note 3 above.	No change
11	36	6.1.3 0 Site No 21	Map 3	Object & Comment	The Development of site No 21 will result in increased traffic along the through route and at the poor quality highway junction which will increase congestion. Dangerous crossroads with poor visibility. The path to the school is inadequate and the shop and pub are quite a distance away from site No 21.	The development of Site 21 should enable highway improvements as part of any future proposals, improving the visibility splays at the junction to achieve relevant highway standards. The Parish Council recognise that many of the footways in the Parish are of poor quality and narrow and have included policies within the NDP to address infrastructure improvement. (Policy B12).	No change
12.1	64	Site No 10	Map 4	Support	Support the potential development areas around Tillington business park which in view of the proximity to services is a sustainable location.	Comments noted and support welcomed.	No change
12.2	63	Site No 21	Map 3	Object	I don't think the position of this site is suitable for development. Access would have to be on the main Tillington Road which is already dangerous with limited visibility and fast moving traffic. Also the look of the village would change, with Pye	The development of Site 21 should enable highway improvements as part of any future proposals, improving the visibility splays at the junction to achieve relevant highway standards.	No change

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					Finch development on one side of the road and this on the opposite side, it would create urban sprawl. Also we would have increased traffic on the Tillington Road from the Pyefinch development.	The Herefordshire Council Core Strategy identifies Burghill as a growth settlement. Both Site 21 and Pyefinch were assessed as part of the process and scored highly.	
13.1	63		Map 3	Support and Comment	Record appreciation of NDP group and basically finds plan acceptable. Map 3 shows the proposed boundary in red with Grange Farm outside the boundary, whereas the map that shows the late submissions includes the farm within the boundary. Why has this changed?	The Map in Appendix 2 (Late submissions) refers to the Burghill Conservation Area boundary and not the settlement boundary.	No change
13.2	69		Map	Objection	I do not like the extensive additional development on the late "submission map" as they extend outside the settlement boundary into open countryside. Sites 34/35 are on low ground and prone to flooding and a high water table and there is no easy access for connecting a road to the site.	The majority of the late submission sites were rejected for future development through the Site Assessment process. However, part of Site 34 was considered suitable for a graveyard extension and has been allocated as a Local Green Space.	No change
14.1		47	6	Map 2 Policy B8	Surely the developments suggested at 2B Lower Burlton and White Roses are backland development, which, as is stated in Policy B8 has a detrimental impact on the character of the village. The existing residents fronting Roman Road would effectively become surrounded by housing No change on all aspects. This does not give the feel of a	The site was assessed during the "Site Assessments" exercise. However, Sites 2B, 2D and White Roses emerged as preferred sites in this locality with highway frontage.	No change

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					<p>village, more of a city suburb. Any development at these sites would no doubt just extend the city boundary and in time residents would in all likelihood be adopted by the city and lose their parish identity.</p> <p>Access at the above two sites needs serious consideration, the current access at site 2B is only a right of way and is insufficient to serve any such development. Presumably if access was on to the Tillington Road via the previously suggested site 2C, would eventually result in site 2C being developed at a later date. Again this would surely only result in the City boundary being extended.</p> <p>The volume of additional vehicles from the sites at Lower Burlton would no doubt be in the region of over 40 when you consider most houses now own at least 2 vehicles spread between parents and any children. These vehicles would all be contributing to the ever increasing traffic flow on Roman Road and the surrounding area, and as the overall development of the area is quite significant much of this traffic would be likely to be contributing to the ever growing traffic back log at peak times.</p> <p>Sustainable drainage systems have been noted in policy B8, a great deal</p>	<p>It is accepted that the three sites at Lower Burlton will result in an increase in local traffic. However, all three front the public highway. Any future access to the sites will have to comply with modern highway safety standards and visibility splays. This will be assessed as part of any future planning application. (See Note 5 above)</p> <p>The existing drainage issues are noted, although modern infrastructure accompanying new development can solve existing problems.</p>	<p>No change</p> <p>No change</p>

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					of research needs to be put into this. The site at 2B has flooded in the past causing damage to pipework and drains of local residents, it currently contains the septic tank and drainage for 4 existing properties and some of White Roses. Could this land realistically take the sewage and drainage of the existing properties and also those suggested by the development, there is no mains sewage to connect to along Roman Road. Site 2B is effectively a collecting point for run-off water from both the Canon Pyon Road and White Roses due to it being surrounded by such high banking. As any development could affect my property so detrimentally in this respect, drainage is a major concern of mine. Residents were informed during the floods two years ago that it would take around 10 years for the bedrock to fully recover and we are currently emptying septic tanks more frequently than in the past.	Policy SD3 of the HC Core Strategy addresses these matters. See note 7.	
14.2	49	6	Map 2	Objection	The development proposed at 2B will not in my opinion maintain the distinct and separate identity of the Parish, any such development would be seen as an extension to the city boundary. The huge development proposed at Huntington /Three elms needs to be taken into consideration.	The Site Assessment process assessed a number of sites throughout the Parish and scored them according to a number of criteria. This site (2B) was one of the preferred sites both in terms of scores and option days' scores.	No change

Ref No.	Page No.	Para. No.	Policy No.	Support/ Object/ Comment	Comments received	PC Comments	Suggested Amendments to NP
					<p>Whilst this is a city proposal it will extend to the southern edge of Roman Road, any development by Burghill Parish to the north of the road will really only link up with this, again extending the city boundary. The wealth of wildlife seen and enjoyed daily at site 2B would be lost, birds of prey, woodpeckers are regulars at the site. Given the local proposals for Huntington /Three Elms the overall effect on local wildlife would sadly be quite destructive</p>	<p>The effect of proposed development on wildlife will be assessed at Planning Application stage through supporting documentation submitted.</p>	
14.3	56	6	13	Objection	<p>As noted in my objection relating to policy B9, the site at B2 seriously flooded 2 years ago causing damage to existing drainage systems. The site at 2B is subject to a great deal of surface water drainage from surrounding roads and properties, development at site 2B and White Roses can only exacerbate an already existing problem. I certainly would not wish to buy a property erected on the land based on what I have seen over the past 20 years at the site. Any drainage works I am sure would not eliminate all the problems and we are being told by environmentalists to expect wet winters to become the norm in future years. I would be very</p>	<p>The existing drainage issues are noted, although modern infrastructure accompanying new development can solve existing problems. Policy SD3 of the HC Core Strategy addresses these matters.</p> <p>See note 7 above.</p>	No change

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					concerned that any development could in fact impact on local existing residents by effectively pushing the problems outwards and on to our properties.		
15.1	10	2.1.2/13		Comment	<p>2.12 - The plan states that there is a "fairly compact housing group near the highway cross at Whitmore".</p> <p>2.13 – The plan states, "the dwellings of Tillington Common form no consolidated group".</p> <p>Close examination of the map indicates that there is actually a larger compact housing group around the main road / Badnage lane junction than at Whitmore Cross in Tillington</p>	<p>It is correct that there is a building group within the Tillington Common area.</p> <p>Amend paragraph 2.13.</p>	<p>Amend paragraph 2.13 1st sentence to read as follows: "The dwellings of Tillington Common form a small group".</p>
15.2	35	6.1.2/6		Object	<p>6.1.26 The sites that are shown within the possible settlement boundaries at Burghill, Tillington and Lower Burlton have the potential to meet the housing requirement imposed on the Parish by the Core Strategy and demonstrate alignment with its policies. Furthermore, they have the potential to achieve this growth at a modest housing density, in line with the aspirations of parishioners and which would also reflect the character and appearance of the parish".</p>	<p>The Herefordshire Core Strategy identifies both Burghill and Tillington as sustainable settlements which will be the main focus of proportionate housing development.</p> <p>Proposed housing sites put forward were assessed through the Site Assessment process. The most favourable were brought forward into the NDP as housing allocations.</p>	No change

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					<p>The number of dwellings inside the proposed settlement boundary for Tillington is currently 18, including the Pub.</p> <p>The addition of a further 24 is hardly "growth at a modest housing density" as it is an increase of over 130%, and nowhere near the desired 18%.</p> <p>I am not against development within Tillington, but this is grossly disproportionate.</p> <p>After speaking to the Chairman of the Steering Group, I understand his vision of two main housing areas of Burghill and Tillington, with the school and the few amenities in the area accessible by pedestrians from both communities. However, Tillington will be transformed from a small community to something else. Tillington in common with Tillington Common does not have the necessary mains services to support such a development, and probably has one of the most dangerous junctions in the parish at Whitmore Cross.</p> <p>The Owner of Tillington Business Park has already been refused permission for an entrance to his site from the main road due to the dangerous road conditions.</p>	<p>The density is appropriate for the area. The 18% proposed is based on the number of dwellings in the Parish, with the villages of Tillington and Burghill being the main focus for housing growth.</p> <p>With regard to the inadequacy of services/infrastructure in Tillington, the Parish Council shares these views. However, it is anticipated that developer contributions will address some of these issues.</p> <p>See Notes 5 & 7 above.</p>	<p>No change</p> <p>No change</p>

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					In order for this development to go ahead, major road alterations will be needed along with the provision of main services. If these are provided, they will attract major developers with only an eye for profit, which will endeavour to breach the settlement boundary line, and no doubt in time would be successful.		
16	1	1	1	Comment	Given the constraints imposed upon the village by government, I believe that the Neighbourhood Plan is by far the best way to minimise the effects which will come from the need to build about 60 new houses. It has taken into account the wishes of all villagers who wanted to comment, and has gathered a huge amount of data about the village and the aspirations of villagers. After months of analysis, this data has been used to identify those areas of the village which most villagers would be prepared to see developed. Many other sites have had to be discarded due to government regulations regarding, e.g. sustainability. Very few villagers will be happy with having land near them developed, but houses have to be built somewhere. It would be very unfair for the village as a whole if undue weight was given to a vocal minority who oppose one part of the	Comments noted and support welcomed.	No change

Ref No.	Page No.	Para. No.	Policy No.	Support/ Object/ Comment	Comments received	PC Comments	Suggested Amendments to NP
					plan. I have had to accept that the piece of land behind us will be developed and spoil our views, other villagers should also accept that development must take place in areas chosen by facts not emotions.		
17.1	56	6	13	objection	<p>I am concerned that having three developments at sites 10, 22 and 25 will have a detrimental to the amount of surface water in the area. This area is NOT LINKED TO MAINS DRAINAGE therefore all the water run-off from the proposed homes (both surface water and discharge from bathrooms, en-suites, toilets, washing machines, dishwashers etc.) will drain into the water table. The area around this side of Crowmoor Lane where it adjoins the golf course is already prone to flooding. This area is below the level of the proposed development (Particularly Area 25 at Cherry Orchard) There is an open drainage ditch which runs at the bottom of the orchard at the back of Victoria Park which serves to drain the orchard and surrounding farm land. This runs less than 2 metres from the back of my home. At present it is dry in the summer but I am concerned that the provision of these new homes above the level of Victoria Park and other properties on</p>	<p>The Herefordshire Core Strategy identifies Tillington as a sustainable settlement which will be the main focus of proportionate housing development. It was also the view expressed in questionnaire returns that the NDP should designate sites for development in addition to identifying settlement boundaries.</p> <p>With regard to infrastructure, new development will be expected to incorporate drainage arrangements as part of the Planning Process. See notes 5 and 7 above.</p>	No change

Ref No.	Page No.	Para. No.	Policy No.	Support/ Object/ Comment	Comments received	PC Comments	Suggested Amendments to NP
					Crowmore Lane will cause the running of "foul water" along this ditch all year round with the resultant increase in pollution causing an increase in insect infestation and smell.		
17.2	44	6	Map 2	Objection	<p>I am concerned that there is no firm plan to provide a footpath adjacent to the road from the Bell P.H. to Whitmore Cross Roads. Without this provision, children will not be able to walk to the school safely.</p> <p>I am further concerned that this small area will see a significant increase in the number of vehicles accessing the road to Hereford at peak times as there will be three additional access points onto the road in a few hundred yards. Given the speed of the traffic traversing this road toward Hereford I feel that without significant speed reduction measures, road widening and improvements to road layout to increase the width of the road and to improve visibility this is likely to become an "Accident Blackspot".</p>	<p>Highway improvements will be facilitated through future development. The potential sites identified (Nos 10 & 22) could offer the ability to improve the alignment of the highway and also provide footways in the area.</p> <p>In addition, Policy B7 promotes the introduction of appropriate traffic calming measures.</p>	No change
18	36	6.1	Policy B1	Comment	Whichever way the village is developed; the road network has to be a major consideration. The only main road into Burghill is the Tillington Road (From the Roman Road into Tillington) Rather than spread housing development in and	A factor in the Site Assessment process was the sustainable location of the sites close to services. Both Burghill and Tillington are identified through the Herefordshire Core Strategy	No change

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					around the village, it would be beneficial to site small developments near existing amenities i.e. school, pub, shop and garage thereby creating cohesions and a "centre" within an integrated community.	as sustainable locations. With regard to infrastructure.	
19	36	6.1	B1	Objection	When we purchased our house in 2010 we were assured that there would be no development of the paddocks at the rear of our property, currently shown on the map on Page 62 as 2B and White Roses. The view from our property was one of the reasons we purchased it and we love the rural feel that the property has at the rear as opposed to the very busy Roman Road at the front. I strongly object to any development to this site. I feel that given the new proposed development of 1000 homes on the opposite side of Roman Road, plus the new planning document requesting permission to build a further 50 homes on the corner of Tillington Road/Roman Road there is no necessity to build on this plot of land.	Several sites were submitted and assessed through the Call for sites and Site Assessment process, these included 2B and White Roses. Sites 2B, 2D and White Roses scored highly and were taken forward into the plan as proposed allocated sites. Whilst the infrastructure issues are noted, with regard to infrastructure, new development will be expected to incorporate drainage arrangements as part of the Planning Process. See notes 5 and 7 above. Whilst a planning application has been submitted, the Parish Council consider it expedient to submit the Burghill NDP with its current allocation of sites as soon as possible. Once submitted, the NDP becomes a material consideration in the determination of planning applications, enabling	No change

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					<p>The ecological impact of developing this plot of land would be great as it is abundant in wildlife, including bats. My cellar floods due to the sloping nature of the ground behind us and I am seriously concerned about the affect developing the land would have upon the structure of my house.</p> <p>One of the remits of the Burghill Parish Plan is to build housing so that "first time buyers and the elderly can remain part of the community" which I would argue rules out this site. It also states that the plan is to lessen car usage. We are so far away from the Parish Hub and with poor bus services that it would be extremely difficult for anyone without a car to be a true member of the community. Would Burghill primary school be the designated school for children living in these properties? I cannot envisage children walking there. If Trinity is the nearest primary school is it acceptable to plan housing that</p>	<p>the Parish to have some control over future development.</p> <p>The effect of proposed development on wildlife will be assessed at Planning Application stage through supporting documentation submitted.</p> <p>Although the sites at Lower Burlton are divorced from services within the Parish, they are close to services in the city.</p> <p>The application for the dwelling on Tillington Road is noted.</p>	

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					relies upon resources from another Parish?		
20	47	6	8	Objection	I am surprised that anyone would consider building in a field that is prone to flooding (2B Lower Burlton). Also it has a septic tank serving four houses on Roman Road. I have lived in a house that has flooded. I know how awful it is to get over it. Also it is hard to get insurance after a flood. Please think carefully before approving this development.	A strategy to alleviate the flooding issues will have to be submitted with any planning application for the site. This could result in environmental benefits to the existing residents.	No change
21	35	6.1 etc.	24	Support & Comment	People have obviously devoted a lot of time to this, taken note of what most villagers appear to want i.e. infill rather than spread where possible. What more can you do? Thank you.	Comments noted and support welcomed	No change
22	36	6.1.3 0	B1	Object & Comment	Site No 22 – will not be suitable if access is from the main road – a very unsafe and dangerous stretch of road near a bend. Site Nos 25 & 10; 10 houses suggested for each site when clearly the majority of parishioners wished for no more than 4 to 7 dwellings per site. (Par 3.1.2) A total of 24 dwellings in Tillington is totally out of proportion with the	The Herefordshire Core Strategy identifies both Burghill and Tillington as sustainable settlements which will be the main focus of proportionate housing development. Proposed housing sites put forward were assessed through the Site Assessment process. The most favourable were brought	No change

Ref No.	Page No.	Para. No.	Policy No.	Support/ Object/ Comment	Comments received	PC Comments	Suggested Amendments to NP
					18% expansion overall. If 60 dwellings need to be placed there are other sites available. A total of 24 dwellings concentrated in this small area is far too many and too close together. Has anyone considered how the local school might be affected?	forward into the NDP as housing allocations. Access and other issues will be assessed as part of any future planning application.	
23.1	64			Object	I was shocked, disappointed and angry to see the proposed developments for Tillington in the Neighbourhood Plan. All those directly affected, i.e. those living closest to the proposed development sites, should be consulted directly. There has been absolutely no contact, consultation has been non-existent and totally inadequate The proposed sites are in green field areas. The site behind Tillington Business Park is green field and should never be included. It is only the units' area on the park which is brownfield. The size of the development is totally disproportionate. Also the site on the Bell Inn field is green field and the owner was never consulted about anything to do with the proposed access. It seems as (Deleted *****)	The Herefordshire Core Strategy identifies Tillington as a sustainable settlement which will be the main focus of proportionate housing development. Proposed housing sites put forward were assessed through the Site Assessment process. The most favourable were brought forward into the NDP as housing allocations. The current NDP is a draft document on which comments are invited from the community. All potential development sites were displayed at the Options days in Autumn 2014. Visitors were invited to comment. The comments were taken into account by the Parish Council when assessing the sites and allocating for development.	No change

Ref No.	Page No.	Para. No.	Policy No.	Support/ Object/ Comment	Comments received	PC Comments	Suggested Amendments to NP
						<p>Site 10 does not include the Business Park, which will be retained in commercial use. Part of the land to the rear of the Business Park within Site 10 has been previously used as part of the Business Park and is considered as Previously Developed Land.</p> <p>The land adjacent to The Bell was put forward for development by the land owner.</p>	

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

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

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

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

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

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					roads which already have more than enough traffic for small roads.	infrastructure issues. See Note 5 & 7 above.	
25.4	35 &	6.1. 24	P64 Map	Object	<p>SITE 10 TILLINGTON BUSINESS PARK</p> <p>"BROWNFIELD" only a small area of the section shown on the map could be considered "BROWNFIELD". Look at this carefully! (Delete *****)</p> <p>Beyond Site 10 is a BIODIVERSITY SITE (BAP). This has not been made clear on the maps p64 and should not be overlooked!</p>	<p>A section of Site 10 (as submitted) was assessed as being brownfield.</p> <p>The Draft NDP recognises that there are BAP sites within the Parish, however this is a non-statutory designation (see NDP Para 2.34).</p>	No change
25.5	56		B13	Blank	<p>Water Management sounds fine – but impossible to carry out on Sites 10 & 22.</p> <p>Why?</p> <p>1) If allowed to follow gravity it will pass onto roads already poorly served for drainage.</p> <p>2) Drainage from septic tanks will find its way onto these roads due to the sort of soil – not very permeable.</p> <p>With the points above, and no mains drainage in Tillington "water management" of the above sites will be almost impossible to achieve.</p>	<p>The existing drainage issues are noted, although modern infrastructure accompanying new development can solve existing problems.</p> <p>Policy SD3 of the HC Core Strategy addresses these matters.</p> <p>See note 7 above.</p>	No change

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

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

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					<p>Burlton Sites (10 at site 2B and 10 at site 2D) and this means that this small area will absorb 70 new dwellings in a very short space of time. I do not in any way see this as "housing growth at a modest housing density". This is one small area at the most southern point of the parish absorbing over half of the housing that is required to be developed.</p> <p>(B) This plan does not reflect the feedback from the parish as part of the limited consultation in which most found that 1 to 7 dwellings per site was the "ideal" option (page 19). Both sites 2B and 2D are in excess of 7 dwellings, and the planning being sort for the land between the Tillington and Roman Roads would be seven times larger than what the parish have feedback as to what the maximum they would consider ideal.</p> <p>(C) I query how this may impact on Policy B1 (page 37) that states "In order to retain the character of the Burghill parish, proposals for new housing will be only be considered on an allocated site or within the settlement boundaries identified on Map 2 (Lower Burlton), Map 3 (Burghill), and Map 4 (Tillington), in accordance with the</p>	<p>at an indicative rate of 30 dwellings per hectare.</p> <p>Whilst a planning application has been submitted, the Parish Council consider it expedient to submit the Burghill NDP with its current allocation of sites as soon as possible. Once submitted, the NDP becomes a material consideration in the determination of planning applications, enabling the Parish to have some control over future development.</p>	

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

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

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

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

28.5	65	6.7	OBJ 2 & 3	Object	<p>Paragraph 6.7.2 states "Policy SD3 of the Herefordshire Core strategy states that measures for sustainable water management will be required to be an integral element of new development in order to reduce flood risk; to avoid an adverse impact on water quantity; to protect and enhance groundwater resources and to provide opportunities to enhance biodiversity, health and recreation."</p> <p>As a resident of a property that backs onto the proposed development site 2B I am very concerned about the risk of flooding and that we have not been fully consulted about the proposed development. Currently 4 houses share a septic tank and 'soak aways' that are situated in the field 2B. Over the last couple of years, with the heavy rainfall we have had this field has become flooded several times and for months at a time has been heavily waterlogged. On one occasion the ground was so heavily saturated that the septic tank was underwater. To develop this small area of land with 10 dwellings would further decrease the areas ability to absorb water and increase the risk of flooding to the dwellings (both existing and new), it may also render our septic tank unworkable. A further impact if this were to happen would be that our homes would decrease in value, our</p>	<p>The existing drainage issues are noted, although modern infrastructure accompanying new development can solve existing problems. Policy SD3 of the HC Core Strategy addresses these matters.</p> <p>See note 7 above.</p>	No change
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					insurance premiums increase and this may leave us in a position where we are unable to insure or sell our home.		
29	28	5	5.3	Comment	<p>We can see a lot of work has gone into developing the Neighbourhood Development Plan.</p> <p>Section 5: Methodology seems to set out a clear and defined way of scoring sites offered for development. This has been corroborated by Kirkwells, so we are happy that the correct procedures have been followed.</p> <p>Section 6: NDP Policies for Burghill Parish. Following the options day local objectives have been clearly outlined in 6.1.1.</p> <p>This being said it is presumed that the development of sites 22, 10 and 25 will include road widening and footpaths along the Tillington Road between Crowmoor Lane junction and the Bell Inn Public House in any planning application?</p>	Comments noted and support welcomed.	No change
30	35	6.1.2 4		Comment	<p>My comment is that there seems to be rather a concentration of development in Tillington (described as a compact housing group), along with the permitted development in Crowmoor Lane (development of the agriculture buildings which will almost double the number of houses and cars on the single track lane</p>	<p>The Herefordshire Core Strategy identifies both Burghill and Tillington as sustainable settlements which will be the main focus of proportionate housing development.</p> <p>Proposed housing sites put forward were assessed through</p>	No change

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					<p>converging onto the crossroads which have limited visibility and very difficult to cross at busy times of the day.</p> <p>Proposed houses behind the shop – how would the effluent / sewage be handled? The water level in Bird Pool following rain is controlled flowing into the cellar of Bird House then being pumped onto Crowmoor Lane which is always wet or icy in cold weather.</p> <p>Also additional vehicles on this notorious cross road with very limited visibility.</p> <p>I do not object to this 'brown field' development providing the above can be taken into consideration in the planning application.</p> <p>The shop is being used as a reason why houses should be built at Tillington but its long term future must be of question as it is owned by (Text Deleted *****)</p> <p>My other concern is the other areas which have been put forward in Tillington which are two 'Greenfield areas' i.e. the road frontage between the Bell and the shop and also Cherry Orchard – a lot of extra cars onto a road with limited visibility and again drainage issues.</p>	<p>the Site Assessment process. The most favourable were brought forward into the NDP as housing allocations.</p> <p>With regard to the inadequacy of services/infrastructure in Tillington, the Parish Council shares these views. However, it is anticipated that developer contributions will address some of these issues.</p> <p>See Note 5 & 7 above.</p>	

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31	36	6.1	B1	Comment	<p>If planning permission is granted for a significant number of houses in the parish, before the NDP. is finalised, an allowance should be made for this. Otherwise the parish could end up with far more houses than necessary.</p> <p>I would suggest the N.D. P. Steering Group and Parish Council discuss this and as a starting point I suggest omitting site numbers 25, 2b and 21 from the settlement boundaries. This would be fair to all areas of the parish and uses the feedback percent figures to decide which areas to delete.</p> <p>Unless something similar to this is decided, the NDP. could be blamed for creating far more houses than the parish wants or is required to have.</p>	<p>Whilst a planning application has been submitted, the Parish Council consider it expedient to submit the Burghill NDP with its current allocation of sites as soon as possible. Once submitted, the NDP becomes a material consideration in the determination of planning applications, enabling the Parish to have some control over future development.</p>	No change
32	53-56	6.6.1 5	B10	Object	<p>Why has the potential access road from Leasown to the potential development site on the Co-Op Farm been blocked by the extension of the "Green Space" across the verge? On what authority?</p> <p>This appears to be an underhand ploy to prevent using otherwise suitable land for housing development.</p> <p>I object most strongly to this multi-faceted strategy to avoid placing housing development in any of the</p>	<p>The space has been designated as Local Green Space to preserve the character of the existing development and its enclosing fringes.</p> <p>Site 35 was assessed through the Call for Sites and Site Assessment process and did not score favourably.</p> <p>The Herefordshire Core Strategy identifies Tillington as a</p>	No change

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

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

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

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					<p>10. Drainage at all sites needs to be seriously considered, some have been known to flood in the past. It would seem to most previously effected by such events, these sites seem totally unsuitable. Even if mains sewage was installed I do not believe all surface water problems would be alleviated and annual cost for such drainage would increase household expenses for existing as well as any new parishioners.</p> <p>11. The site at 2B Lower Burlton is identified in my house deeds as "The Quarry", which no doubt indicates a possible use of the site in the past. I personally would not wish to buy a property erected on a former quarry and this alone requires further investigation.</p> <p>12. Given the proximity of the Lower Burlton sites to other previously suggested sites, I would be very concerned that the currently suggested sites would in the future be extended to included more large development, i.e. the site at 2C. The overall affect on the area would certainly not be in keeping with a village feel, again increasing the likelihood of the city boundary being extended.</p> <p>13. Any proposed increase to residents of this parish must be</p>	<p>With regard to the inadequacy of services/infrastructure in Tillington, the Parish Council shares these views. However, it is anticipated that developer contributions will address some of these issues.</p> <p>Comments noted</p> <p>Comments noted</p> <p>The Herefordshire Core Strategy identifies Burghill and Tillington</p>	

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					backed up by evidence that the parish can cope with the increase. The roads throughout the parish need resurfacing BEFORE any increase in traffic, the churchyard MUST have an extension in place (not just a possible extension) there is not enough room for current parishioners to be buried, the school needs specific assessment to determine how many additional children could be accommodated. 14. The whole process of this development plan, the lack of communication and consultation of people directly affected, and the difficulty of this form for commenting and objecting have unfortunately resulted in a great deal of loss of faith in our current Parish Council members and their ability to truly represent the views and concerns of their Parishioners.	as sustainable settlements which will be the main focus of proportionate housing development, with a figure of 18% growth proposed for the Hereford Housing Market Area (Policy RA1). The Lower Burlton sites are close to services within the city. The Parish Council have carried out consultation in accordance with the Regulations. This has included a questionnaire and Options Days in October 2014. From these consultations, the draft NDP was formed taking into account wishes of residents. As part of this consultation, comments have been invited from residents on the draft NDP. See note 6 above.	
35	63	1	1	Object	The proposed development includes a major proposal for development on green field land in the "Tillington Business Park" area. This is wholly inappropriate (and actually goes against so-called policy "B1(a)") because – * The scale of development is far in excess of the 4-7 units preferred by respondents to the questionnaire;	Whilst the questionnaire returns favoured sites of 4-7 dwellings (40%) more than 8-10 dwellings (33%), the Herefordshire Core Strategy proposes development at an indicative rate of 30 dwellings per hectare. The Herefordshire Core Strategy identifies Tillington as a sustainable settlement which will	No change

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					<p>* The neighbourhood is lightly populated and so will be radically changed by a development on the proposed scale</p> <p>* The site is on the highest ground in the immediate vicinity and will be highly visible (a "blot on the landscape" even) for a significant distance around, permanently changing the character of the area</p> <p>* Significant further development is likely to be sought after major investment in necessary infrastructure by Welsh Water</p> <p>* Such development will certainly amount to the creation of a new village settlement - "NEW TILLINGTON"</p> <p>* The proposal is therefore DISPROPORTIONATE and INAPPROPRIATE - and without consultation of residents</p> <p>The overall proposal totally ignores the option of retaining new development in the existing settlement of Burghill, i.e. the Copse-Leasown area and the area North of Home Farm, which are both natural organic expansions of the village.</p> <p>This response format, with "required data" of page numbers etc. blocks submission through "validation errors"; the option of "object" or</p>	<p>be the main focus of proportionate housing development.</p> <p>Proposed housing sites put forward were assessed through the Site Assessment process. The most favourable were brought forward into the NDP as housing allocations.</p>	

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					"comment" but not both, is not appropriate for village consultation and discourages participation. Change it to something simple and conducive to resident involvement.		
36	36	6	1	Object	I object to the proposed housing near Redstone (NDP Site No: 21) for the following reasons; 1) Our potential outlook obscured. 2) Potential depreciation of our property value (as already experienced when Manor Fields was developed). 3) Concerns about a safe access to the proposed site. 4) Lack of pathways. 5) Already the most compact group of housing in the local area.	Proposed housing sites put forward were assessed through the Site Assessment process. The most favourable were brought forward into the NDP as housing allocations.	No change
37.1	35	6.1.2 5		Object	At no stage do I remember being asked about the settlement boundary. Who decided it and where it should go. Surely residents should have been consulted about something that important.	The settlement boundary for Lower Burlton and Burghill is based on the boundaries identified in the UDP and allocated sites in the draft NDP. The proposed settlement boundary for Tillington is the existing built form and sites allocated in this Draft NDP. As part of this consultation, comments have been invited from residents on the draft NDP	No change
37.2	36	6.1.3 0	B1	Object	My complaint is regarding development at the business park	The detail of the layout and drainage/infrastructure issues will	No change

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					and want clarification as to where the houses would be. Do the houses look out to the existing buildings in the BP? Also with the new housing you look at sewage and waste water. On an incline the run off needs to go somewhere and with the constant flooding at the Crowmoor Lane and outside Domino House crossroads, it would suggest mains sewage would be required and the disruption that would be caused.	be the subject of a future planning application	
38	All			Objection and Comment	Burghill Weobley Road and Tillington Road through to Credenhill the cars using these roads a lot of them are driving over the speed limit. Also getting heavy goods vehicles and large farm machinery. It's getting unsafe to be able to walk on these roads without standing in the hedge. The local council and Hereford Council need to look where is the septic tank drainage and rain going to go filter through and end up down towards Rogers Cross which already floods badly also Tillington Road below where I live we experience enough problems now without surface water after heavy rain as it runs off the road and down our drive into our barn and outbuildings. There is a council manhole grated cover and drain which goes	The management and maintenance of highways and their drainage is not a matter or function of the Parish Council. See note 7 above	No change

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					nowhere. Council men have looked and done nothing.		
39	36 and 64	6.1.30 and map envelope	B1	Support, Object & Comment	<p>In the Site Assessment Report produced by Kirkwells Site 22 is graded equal first in the whole parish with one other site in Burghill. This assessment included consideration of the combined areas as one. The Draft Plan only shows part of Site 22 within the settlement boundary and only road frontage development is being proposed for development. Given the relationship of this site to the road, structures and geography of this part of Tillington, the settlement boundary appears to be drawn up in an arbitrary manner.</p> <p>The steering group do not agree with Kirkwells assessment and we do not agree with your revised assessment total. Below is our assessment and explaining clearly, reasons why we consider Kirkwells to be more accurate. Road frontage development is totally inappropriate for Site 22.</p> <p>When considering site assessments, a helpful reference document produced by Herefordshire Council is the Neighbourhood Guidance Note No. 21. A link to this document is attached.</p>	<p>Comments noted and support welcomed.</p> <p>Through the Site Assessment process, both sites achieved a high score.</p> <p>The PC is however mindful of the questionnaire return which favoured attracting tourism to the area and the proposed allocations are through to be a suitable result.</p>	No change

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

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					<p>Other criteria</p> <p>Contaminated land The land has no known contaminants.</p> <p>Transport and highways access A suitable vehicular access is available and can be demonstrated as such. It would also include an element of betterment to the existing access into The Bell. Good community facilities within the locality are all within walking distance of the site.</p> <p>Proximity to shops, employment and public transport The site is adjacent to a bus route. It is located next to a public house, a business park, a shop and within easy walking distance of the local school.</p> <p>Impact upon the landscape and the wider environment The site, although on rising ground, is surrounded by mature hedgerows and buildings. Keeping the hedge intact along the main road boundary of the site preserves the existing character of Tillington. The site is contained within a central triangulated road layout and so forms a natural barrier regarding further spread into the adjacent countryside. It also helps to</p>		

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

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					will afford us the opportunity to address them and answer all questions that		
40	Map 2 page 62			Comment	The Lower Burlton settlement boundary does not reflect the site submission on page 68 for Site 2E. What is the point of consultation if housing is then built on areas which have not been designated?	Site 2E was assessed through the Site Assessment process and scored less favourably than others and was therefore not brought forward as an allocation in the draft NDP.	No change
41	Maps 2 and 4			Objection	There are many reasons which I'm sure we do not have to go into detail about. We are situated right in the middle of the biggest development being proposed at the moment and have not been consulted in any way. I am confused that Lower Burlton and Tillington are taking the majority of the housing with an area with no mains drainage and sewerage we think could impact on us.	All sites submitted were assessed through the Site Assessment process. This resulted in the most favourable sites being brought forward as allocation in the draft NDP.	No change
42.1					These representations are submitted on behalf of Farmcare Ltd which owns, manages and farms the Tillington Estate which includes	The submission version of the Burghill Neighbourhood Plan will be accompanied by a Basic Conditions Statement detailing how the NDP satisfies the Basic	No change

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					<p>much agricultural land and buildings within Burghill Parish.</p> <p>This letter is submitted in response to the current public consultation on the draft Burghill Neighbourhood Development Plan (BNDP) which commenced on 20 January 2016 and was due to end on 2 March 2016. As you are aware, we requested that the consultation period be extended until 16 March 2016 because the Site Assessment Report (SAR), which forms part of the evidence base for the Plan, was not made available until 22 February 2016. The SAR is referenced within the BNDP and informs the preferred list of 'candidate sites for allocation'; therefore, it is essential that we had the opportunity to consider this information fully. The Parish Council agreed to extend the consultation period to 11 March 2016 by e-mail dated 26 February 2016.</p> <p>National planning policy guidance and legislation relating to neighbourhood plans requires the such documents and their policies to be in general conformity with the adopted Development Plan for the relevant local authority area. The Town and County Planning Act 1990 (TCPA 1990) and, in particular, Schedule 4B deals with the process</p>	<p>Conditions of the Town & Country Planning Act 1990 as amended by the Localism Act 2011.</p>	

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					<p>for making neighbourhood development orders and plans. The BNDP must meet the 'Basic Conditions' as set out at paragraph 8</p> <p>(2) TCPA 1990 which include:</p> <ul style="list-style-type: none"> • The Plan has regard to national policies and advice contained in guidance issued by the Secretary of State; • The Plan contributes to the achievement of sustainable development; • The Plan is in general conformity with the strategic policies contained in the development plan for the area; • and, • The Plan does not breach and is otherwise compatible with EU obligations. <p>Having considered the draft BNDP in detail, it is contended that the Plan does not meet all of the Basic Conditions, namely having regard to national policies and advice and general conformity with the strategic policies of the Development Plan for Herefordshire. This is considered below. In addition, consideration is given to the SAR, in particular the</p>		

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					findings relating to the sites submitted by Farmcare and the proposed sites for allocation. It is not considered that this report provides a robust evidence base for determining which sites are most sustainable.		
42.2					<p><u>Does the BNDP have regard to National Policies and Advice?</u> The National Planning Policy Framework (NPPF) encourages local communities to prepare Neighbourhood Plans to ensure that they get the right types of development for their community. In applying the presumption in favour of sustainable development, paragraph 16 requires that Neighbourhood Plans 'plan positively to support local development, shaping and directing development in their area that is outside the strategic elements of the Local Plan.'</p> <p><u>Settlement Boundaries for Tillington and Burghill</u> The NPPF establishes a strong presumption in favour of sustainable development that has implications for how communities engage in neighbourhood planning. It requires communities to plan positively and for 'all plans to be based upon and reflect the presumption in favour of</p>	<p>The settlement boundary for Lower Burlton and Burghill is based on the boundaries identified in the UDP and allocated sites in the draft NDP. The proposed settlement boundary for Tillington is the existing built form and sites allocated in this Draft NDP.</p> <p>This facilitates a level of growth appropriate to the Parish and in "general conformity" with the Herefordshire Core Strategy.</p>	No change

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					<p>sustainable development’ (para 15, NPPF). The Planning Practice Guidance states that local authorities should support sustainable rural communities by encouraging proportionate growth: ‘Assessing housing need and allocating sites should be considered at a strategic level and through the Local Plan and/or neighbourhood plan process. However, all settlements can play a role in delivering sustainable development in rural areas – and so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence.’ (Paragraph 001, Reference ID: 50-001-20140306) The adopted Herefordshire Core Strategy explicitly identifies Tillington and Burghill as settlements where proportionate housing growth is considered to be appropriate. However, the proposed settlement boundaries are drawn tightly around the existing built up area of the villages; indeed, the boundary for Tillington comprises only a very small proportion of the Village. This</p>		

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					<p>type of approach has been found to be contrary to the provisions of the NPPF.</p> <p>The Examiner's Report concerning the Rolleston-On-Dove Neighbourhood Plan Examination identified that the proposed tightly drawn settlement boundary in this case failed to plan positively to support local development and, as a consequence, it was contrary to the NPPF and was recommended for deletion.</p> <p>Herefordshire Council's Neighbourhood Plan Guidance Note 20 entitled 'Guide to Settlement Boundaries', states that 'settlement boundaries should be drawn to facilitate an appropriate level of proportional growth within the plan period.</p> <p>If land within the boundary is not formally allocated, there will be a requirement to demonstrate that there is enough available capacity within the boundary to enable development to take place.' The Guidance Note is clear that settlement boundaries should not be crude and inflexible but instead they should seek to 'ensure a more planned and controlled approach to future housing growth, allowing for</p>		

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					<p>allocating sites within your village rather than windfalls.' (p.3). Burghill has an existing settlement boundary and Tillington does not. The proposed amendments to Burghill and the new boundary proposed for Tillington are tightly drawn around existing built forms. Accordingly, there is little opportunity for any windfall development. Indeed, it is not clear what analysis has been undertaken of infill and/or windfall development opportunities in either Village in order to inform the proposed settlement boundaries. Paragraph 6.1.20 of the BNDP states that 14 windfall units are already known; however, evidence to qualify this figure is not provided. The nature of the built settlements is such that there is little development beyond the highway. In Tillington, for instance, the boundary is also unduly inflexible with its focus on small clusters of buildings along the highway; thus, limiting the potential for windfall sites through infill. There are few opportunities for development on backland or in gardens and while opportunities do exist for infilling, these would not be forthcoming as a result of the</p>	<p>Whilst the Parish Council are aware of 14 windfall sites that may come forward during the plan period, these have not yet been submitted as planning applications. As and when the applications come forward, they will be determined through the relevant policies/legislation.</p> <p>The windfall sites that have come through the Submitted Sites and the Site Assessment Process are identified in Appendix 7.</p> <p>The Parish Council consider that as the windfall sites are within open countryside/conversions, they are not appropriate for allocation in the Burghill NDP.</p>	<p>Amend plan to include reference to Appendix 7 in para 6.1.20</p>

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					<p>currently proposed settlement boundary.</p> <p>Various development opportunities have been submitted to the Parish Council, which could deliver sensitive development, proportionate to the existing settlements. The BNDP seeks to draw a settlement boundary around Tillington; naturally, this will need to reflect the allocated sites.</p> <p>In summary, the settlement boundaries, as proposed, would not facilitate an appropriate level of proportional growth in Tillington and Burghill. The BNDP states that there is potential for 20 dwellings to come forward on windfalls sites but this does not appear to be supported by an assessment of available capacity to demonstrate that this is achievable.</p> <p>Furthermore, it is contended in the following sections that the housing requirement is higher than indicated in the BNDP and the site assessment supporting the proposed site allocations is not robust. The settlement boundaries may, therefore, need to accommodate different sites.</p> <p>For the above reasons the BNDP fails to have full and proper regard to national policies and advice</p>		

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					contained in guidance issued by the Secretary of State and does not pass this first Basic Condition.		
42.3					<p><u>Contribution Towards the Achievement of Sustainable Development</u></p> <p>In order to meet the second Basic Condition, the NDP needs to demonstrate that the proposed site allocations are the most sustainable options. With regard to site allocations, the BNDP is supported by a SAR (September 2015) prepared by Kirkwells. This document seeks to assess the potential suitability and availability of the submitted housing sites although concerns are raised with the consistency of this assessment. In support of this, reference should be made to the recent (March 2016) decision of Aylesbury vale District Council not to contest a legal challenge made by a Developer to the Haddenham Neighbourhood Plan. In this case, the Developer, Lightwood Strategy Ltd, provided evidence that errors were made in the scoring system used to allocate areas for development in the neighbourhood plan and that the plan had failed to reflect Aylesbury Vale's strategic housing requirement for the area. The same is contended</p>	<p>The site assessments were carried out by Kirkwells Ltd. The scoring criteria is based on a criteria used industry wide to assess suitability of sites for future development.</p> <p>The Site Assessment Reports details the methodology on how the site assessments were carried out. The selection of these criteria was based on the guidance produced by Herefordshire Council.</p> <p>Sites 37 and 38 are in open countryside and therefore not seen to be a sustainable location.</p> <p>As both the NPPF and the Herefordshire Core Strategy have a presumption in favour of sustainable development, the further scoring of sites in open countryside is not appropriate.</p> <p>The Burghill NDP includes sufficient sustainably located sites to accommodate the required level of growth for the plan period</p>	No change

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					<p>with regard to the SAR and this is explored further below.</p> <p>Eight sites, numbered 34 – 41 on the Plan included on p. 69 entitled Burghill NDP Submitted Sites Burghill Parish & Neighbourhood Area Late Submissions, were submitted on behalf of Farmcare during the 'call for sites' exercise carried out by the Parish Council in May 2014. These sites, together with those proposed as residential allocations, are the focus of the representations.</p> <p>Before analysing the SAR, for clarification, please note that Farmcare is aware that the purpose of a 'call for sites' exercise is to make the Parish Council aware of all land / sites that are deliverable for development i.e. suitable, available and achievable, within the neighbourhood plan area. It understands that whole or parts of submitted sites may be allocated. Accordingly, a range of sites were submitted in order to provide the Parish Council with as many options for consideration as possible. Farmcare did not anticipate and has no expectation that all of the submitted sites be allocated; it understands that the aim of the BNDP is to allocated sites to ensure</p>	<p>and is in general conformity with the Herefordshire Core Strategy.</p>	

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					<p>that the level of growth identified by the Core Strategy will be delivered in a timely manner during the Plan period.</p> <p>The SAR states that its assessment criteria are informed by Neighbourhood Planning Guidance Practice Note 21 (Guide to site assessment and choosing allocation sites), although this is not clear from the report and the assessment tables.</p> <p>The constraints criteria are confusing; surely this should identify constraints that prevent development and it is these more significant constraints that should then be scored. It is noted that several of the 'recommended sites' are identified as having 'significant constraints'.</p> <p>Notwithstanding that, it is considered that the eight Farmcare sites have been scored too high, particularly in relation to their 'constraints'. Detailed comments have been made with regard to each of the submitted sites in the tables enclosed with this letter (Table 1 and Table 2). A summary table, overleaf, compares the scores determined by Kirkwells with the score determined by Savills for</p>		

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					<p>Farmcare sites (white) and allocated sites (blue).</p> <p>As the above table indicates, the Savills Score for the Farmcare sites fall within the Kirkwells scoring range (2.25-3.25) for those sites that were identified as the 'best sites' and recommended to the Parish Council in Section 4 of the SAR.</p> <p>The tables enclosed with this letter provides a more detailed assessment of the above identified sites, in comparison to the Kirkwells assessment. This highlights the errors made in the scoring system. Indeed, evidence of the rationale behind the scores attributed to all the assessed sites in the Kirkwells report is severely lacking. For instance, two of the Farmcare sites (nos. 37 and 38) were immediately ruled out before any detailed assessment of their constraints, access and impacts. On this basis, it is our view that the site assessment report currently does not evidence a robust assessment of the submitted sites and, therefore, the current scores cannot be relied upon. As such, it is requested that new, clear assessment criteria are established and the exercise is repeated.</p>		

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					For the reasons set out above, the BNDP fails to contribute towards the achievement of sustainable development.		
42.4					<p><u>Does the BNDP Conform to the strategic policies of the Development Plan?</u></p> <p>The Council's Neighbourhood Planning Guidance Note 31 is concerned with conformity with the Herefordshire Core Strategy and states: 'Housing policies and proposals (including allocations) in Neighbourhood Development Plans will need to be minded to the Policies RA1 and RA2 of the Local Plan - Core Strategy and local evidence including local needs surveys, Strategic Housing Land Reviews and environmental capacity.'</p> <p>It also states that 'Neighbourhood planning is not a tool to stop development and, or undermine or object to the strategic policies and proposals to the Local Plan - Core Strategy; it is about shaping the development of a local area in a positive manner.'</p> <p><u>Development Plan</u></p> <p>The Development Plan for Herefordshire includes the Herefordshire Local Plan Core</p>	Comments noted	No change

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					<p>Strategy 2011 – 2031 (2015) and 'Saved Policies' of the Herefordshire Unitary Development Plan (2007). The Core Strategy proposes broad strategic directions for growth and does not allocate sites; instead, site allocations and more detailed policies will follow in the Hereford Area Plan, the Bromyard Development Plan and Neighbourhood Development Plans. The Core Strategy sets a minimum housing requirement of 16,500 dwellings for Herefordshire over the plan period up to 2031 (Policy SS2 – Delivering new homes). This includes a minimum of 5,300 dwellings in rural areas. Paragraph 4.8.8 states that housing development in rural areas will be delivered through Neighbourhood Development Plans, any required Rural Areas Site Allocations Development Plan Document and a combination of existing commitments and windfall development. Policy RA1 requires 5,300 new dwellings to be delivered in rural areas, across seven Housing Market Areas (HMAs). It states that 'new dwellings will be broadly distributed across the County's rural areas on the basis of these HMAs'. It</p>		

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					<p>continues that 'the indicative housing growth targets in each of the rural HMAs will be used as a basis for the production of NDPs'. It is important to note that the figures are indicative and form only a basis for NDPs.</p> <p>The minimum target represents a level of growth as a percentage and which is proportionate to existing HMA characteristics. Tillington and Burghill are within the Hereford HMA, which will deliver approximately 18% of the indicative housing growth figure. This equates to approximately 1870 dwellings.</p> <p>Policy RA2 is concerned with where new housing will be located in identified settlements outside Hereford and the market towns. It states that:</p> <p>'To maintain and strengthen locally sustainable communities across the rural parts of Herefordshire, sustainable housing growth will be supported in or adjacent to those settlements identified in Figures 4.14 and 4.15. This will enable development that has the ability to bolster existing service provision, improve facilities and infrastructure and meet the needs of the communities concerned.</p>		

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					<p>The minimum growth target in each rural Housing Market Area will be used to inform the level of housing development to be delivered in the various settlements set out in Figures 4.14 and 4.15.</p> <p>Neighbourhood Development Plans will allocate land for new housing or otherwise demonstrate delivery to provide levels of housing to meet the various targets, by indicating levels of suitable and available capacity. Figure 4.14 lists the 119 settlements which have been identified across the County to be the main focus of proportionate housing development in the rural areas; 23 of these are in Hereford HMA. Within Burghill Parish, the settlements of Tillington and Burghill are identified and, therefore, the BNDP must have appropriate flexibility to apportion the minimum housing requirement between them. Policy RA2 continues that:</p> <p>'Housing proposals will be permitted where the following criteria are met:</p> <p>1. Their design and layout should reflect the size, role and function of each settlement and be located within or adjacent to the main built up area. In relation to smaller settlements identified in fig 4.15 proposals will be expected to</p>		

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					<p>demonstrate particular attention to the form, layout, character and setting of the site and its location in that settlement and/or they result in development that contributes to or is essential to the social well-being of the settlement concerned;</p> <p>2. Their locations make best and full use of suitable brownfield sites wherever possible;</p> <p>3. They result in the development of high quality, sustainable schemes which are appropriate to their context and make a positive contribution to the surrounding environment and its landscape setting; and</p> <p>4. They result in the delivery of schemes that generate the size, type, tenure and range of housing that is required in particular settlements, reflecting local demand.'</p> <p><u>Burghill Neighbourhood Development Plan</u></p> <p>The BNDP refers to the Core Strategy housing requirement at paragraphs 6.1.16 – 6.1.20 and explains how it applies an 18% growth target based on the existing number of dwellings within Burghill Parish. It must be recognised that the Core Strategy repeatedly states that the growth set out as minimum</p>		

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					<p>figures that should be used as a guide for NDPs.</p> <p>There are a number of policies that do not currently conform to national policies and advice and are not in general conformity with the strategic policies contained within the Herefordshire Development Plan. Accordingly, the BNDP does not achieve the Basic Conditions required by the TCPA 1990. In particular, policies B1, B4 and B10 do not conform for the reasons discussed below. Recommendations are made in order to overcome the issues identified.</p>		
42.5			B1		<p>Core Strategy Policy H2 Rural Exception Sites supports proposals for affordable housing schemes in rural areas on land that would not normally be released for housing where it meets the criteria contained within. Accordingly, the above Policy should be amended to include exception sites as well as allocated sites and land within the settlement boundary.</p> <p>With regard to the allocated sites, once found to be sound, these should be listed within the Policy for clarity and ease of reference.</p>	<p>The Parish Council have chosen not to allocate rural exception sites through the NDP. Should a rural exception site come forward during the plan period this will be assessed against the relevant Herefordshire Core Strategy policies (presently H2).</p> <p>The Parish Council consider the criteria within (a), (f) and (i) below.</p>	No change.

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					<p>A number of criteria contained within the Policy are not consistent with the Core Strategy, namely criteria (a), (f), (i).</p> <p>Each are dealt with in turn below.</p> <p>Criterion (a) seeks to restrict the density of new development. Core Strategy Policy SS2 sets a County target net density of between 30 – 50 dph, although it may be less in sensitive areas. There is no justification offered as to why 25dph is considered a maximum density; indeed, national planning policy guidance seeks to remove maximum density requirements to ensure the most efficient and effective use of land can be achieved. The first part of the criterion requires new development to be in keeping with the surrounding area and this is considered to provide sufficient protection against overdevelopment. Therefore, it is recommended that criterion is reworded to remove the 25dph restriction.</p> <p>Criterion (f) is not consistent with the Core Strategy. Core Strategy Policy H1 Affordable Housing Thresholds and Targets seeks affordable housing provision on sites of more than 10 dwellings which have a maximum combined gross floorspace of more than 1000m². On</p>	<p>(a) The density figure is included as a maximum. It is clear from Ordnance Survey maps that densities in the two settlements (Burghill and Tillington) fall far short of 25 dwellings per hectare, and future development in context with the surrounding area should reflect this.</p> <p>(f) The Parish Council consider this criterion to be fully in accordance with Herefordshire Core Strategy policies.</p>	<p>No change.</p> <p>No change.</p>

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					<p>qualifying sites in the Hereford, Hereford Northern and Southern Hinterlands, and Kington and West Herefordshire housing value areas, an indicative target of 35% affordable housing provision is sought unless it can be demonstrated that this is not viable. Criterion (f) should be amended to reflect this guidance.</p> <p>The second part of this Criterion requires 'at least 15% of single storey dwellings'. This is not justified and is considered to be too prescriptive. It is recommended that this requirement is removed on the basis the remaining text seeks 'a mix of dwelling, tenures, types and sizes'.</p> <p>Criterion (i) sets a minimum space standard. This is not acceptable and not in accordance with planning policy and other national guidance. National space standards exist with regard to minimum floorspace requirements for residential dwellings. There is no requirement to conform but Local Authorities can adopt national spaces standards; they may not set their own thresholds. On that basis it is recommended that criterion (i) is removed.</p>	<p>The questionnaire responses indicate that 55% of respondents suggested that small dwellings for older/retired people are required in the Parish. The Burghill NDP reflects the wishes of the community. (Graph included in paragraph 3.9 of the Burghill NDP)</p> <p>The Parish Council consider the inclusion of a minimum floor space for dwellings a necessity to ensure the dwellings that are constructed in the Parish are fit for purpose.</p>	<p>No change.</p> <p>No change.</p>

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42.6			B4		<p>Policy B4 Rural Enterprise and Farm Diversification is too prescriptive and not consistent with the Core Strategy.</p> <p>Furthermore, it includes a section that relates to the conversion of traditional agricultural buildings. This should be for a separate policy taking into consideration permitted development rights.</p> <p>Policy B4 should be re-written to reflect the spirit and purpose of Policy RA6. It is important the policy encourages farm diversification and types of development that will contribute to the vitality and viability of rural economies.</p>	<p>The Parish Council consider this policy is fit for purpose.</p> <p>Prior approvals for permitted development are not assessed against policy.</p>	No change
42.7					<p>Policy B10 Protection of Local Green Space claims to designate 8 Local Green Spaces (LGS) in accordance with paragraphs 76 and 77 of the National Planning Policy Framework (NPPF).</p> <p>In addition, the national Planning Practice Guidance (PPG) is clear that LGS designations should not be used in a way that undermines the identification of development land in suitable locations (Paragraph 007, ref. ID: 37-007-20140306)</p>	Comments noted.	No change.

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					<p>Policy B10 seeks to both protect and allocate land. It is clear from the above policy guidance that LGS designations should seek protection only. Of particular concern is the inclusion LGS 4 'The green areas at Leasown and Bakers Furlong' and LGS 8 'Possible graveyard extension St. Mary's Church'.</p> <p>Map 6 contained within the BNDP is poor quality but it appears that LGS 4 includes public open space between Bakers Furlong and Leasown housing estates, as per the UDP Proposals Map Insert 7 (Burghill). In addition, it is proposed to include privately owned land, estate roads and turning areas, boundary treatments, ditches and footpaths. It is not clear why this land has been included and it would not meet the tests of the NPPF set out above. Accordingly, it is recommended that the LGS 4 be amended to reflect the area identified in UDP Proposals Map which includes accessible and useable public open space within a residential area.</p> <p>The Policy proposed that LGS 8 is a possible extension to the existing church graveyard, which is not the purpose of LGS designation. For clarification, this land cannot be</p>	<p>Better quality maps will be produced for the submission plan. The Local Green Space has been extended beyond that identified in the Herefordshire UDP as Open Areas and Green Space to reflect what is actually evident on site.</p> <p>The ownership of land does not preclude its designation as a Local Green Space.</p>	<p>Maps to be produced on a smaller scale OS base to ensure clarity.</p> <p>No change.</p>

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					considered as LGS as it is land owned and farmed by Farmcare. It is not and never has been publicly accessible. Therefore, it cannot be considered 'demonstrably special to the local community' or hold 'particular local significance' (NPPF, para. 77) . Furthermore, this land was submitted as part of the 'call for sites' exercise (Site reference 34) previously referenced, for consideration for residential uses and an extension to the graveyard. It is recommended that this site be removed as a LGS designation.	LGS 8 was put forward by the village as a site for a possible extension to the graveyard.	
42.8					These representations are submitted by Savills on behalf of Farmcare Ltd which is a major land owner within Burghill Parish. It has been demonstrated that the draft BNDP fails to meet three of the 'Basic Conditions' required by TCPA 1990 . In particular, our assessment demonstrates that the settlement boundaries, as proposed, are inflexible and would not facilitate an appropriate level of proportional growth in Tillington and Burghill. In addition, the SAR prepared by Kirkwells has been analysed and it is our view that the report currently does not evidence a robust	Comments noted	No change

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					assessment of the submitted sites and the current scores cannot be relied upon. Therefore, we request that new, clear assessment criteria are established and the exercise is repeated. Overall, the BNDP in its current form fails to contribute towards the achievement of sustainable development. We welcome the opportunity to meet with the Parish Council to discuss the points made in this representation, prior to submitting the plan to Herefordshire Council.		
43	10	2.1.3	3.13	Comment	Tillington Common has been described as 2.13 The dwellings of Tillington Common form no consolidated group. The housing is mainly ribbon in layout and is interspersed with rural gaps and the open land of the designated Tillington Common. I would like to add that there is a definite consolidation of houses (shown in the photographs on pages 10 and 15 of the NDP) therefore this is not a viable reason for the area not to be considered for a settlement boundary. Also the questionnaires completed for the NDP state that 3.13 The majority of households (82%) think Burghill village should continue to have a settlement boundary. The	It is correct that there is a building group within the Tillington Common area. Amend paragraph 2.13. At the time of the Examination in Public of the Herefordshire Core Strategy it was the view of Burghill Parish Council that Tillington and Tillington Common	Amend paragraph 2.13 1st sentence to read as follows: “The dwellings of Tillington Common form a small group”. No change.

Ref No.	Page No.	Para. No.	Policy No.	Support/ Object/ Comment	Comments received	PC Comments	Suggested Amendments to NP
					<p>majority of households (78%) think a settlement boundary for Tillington should be defined. The majority of households (71%) think a settlement boundary for Tillington Common should also be defined. This correlation allowed the NDP to conclude that settlement boundaries would be completed for Burghill and Tillington BUT omitted the findings for Tillington Common, WHY were the 'Commoners' views not treated as that of Burghill and Tillington.</p>	<p>should both be classified as open countryside. However, the adopted version of the Herefordshire Core Strategy includes both Tillington and Burghill in Policy RA1 as housing growth areas. It follows that the designation of a settlement boundary for each of these areas would be appropriate.</p> <p>Tillington Common is not included in Policy RA1 (Tables 4.14 and 4.15) and as such remains open countryside with no defined identifiers as a village in planning terms. Moreover, as it is excluded from Policy RA1, it is considered to be an unsustainable location for new development due to lack of services and infrastructure. Therefore, development proposals for Tillington Common and the wider parish are governed by the Core Strategy planning policy constraints for development in the countryside, outside of settlement boundaries, as set out in Herefordshire Core Strategy Policy RA3. For the above reasons it is considered that the definition of a settlement boundary for the Tillington</p>	

Ref No.	Page No.	Para. No.	Policy No.	Support/ Object/ Comment	Comments received	PC Comments	Suggested Amendments to NP
						Common area would be neither necessary nor appropriate.	
44	All			Object	See table below	See table below	No change
45	All			Object	See table below	See table below	No change
46	All			Object	See table below	See table below	No change
47.1 -47.	All			Object	See table below	See table below	No change
48	All			Object	See table below	See table below	No change
49	All			Object	See table below	See table below	No change

Ref No	Comments	PC Comments	Amendments to NDP
44	<p>I am objecting to the imposition of the Burghill Draft Plan where there has been inadequate consultation and NONE WITH THE COMMUNITY since November 2014 since when this plan has been created.</p> <p>In particular, there is considerable bias with Tillington unfairly and disproportionately being targeted with development.</p> <p>1. Site 19 is GREENFIELD and not as having being described as brownfield which has unfairly given it</p>	<p>The Parish Council have carried out consultation in accordance with the Neighbourhood Planning Regulations. This has included a questionnaire and Options Days in October 2014. The Options Days were advertised on the Parish website, community magazine, posters and on a flyer delivered to every household.</p> <p>Following the Option Days consultations, the Steering Group concentrated their efforts on producing a draft plan that took into account the residents views wherever possible.</p> <p>The current NDP is a draft document on which comments are invited from the community.</p> <p>Site 19 is identified as Greenfield in the site assessments report. If this comment is referring to Site 10, part of the land to the rear of the Business Park within Site 10 has</p>	No change

Ref No	Comments	PC Comments	Amendments to NDP
	<p>a status and has influenced people to vote for it at the Options Days.</p> <p>2. A settlement boundary has been drawn around Tillington without any consultation with the community at large or directly with the residents that are having this imposed on them. WE don't want it!</p> <p>3. The scale of development at Tillington amounts to a housing estate and is not in keeping with the character and appearance of this area.</p> <p>4. The size of the proposed development is far in excess of the 1-7 dwellings per site that the majority of the community preferred.</p> <p>5. The area at Tillington where this massive development is proposed is one of the least</p>	<p>been previously used as part of the Business Park and is considered as Previously Developed Land.</p> <p>The Herefordshire Core Strategy identifies Tillington as a sustainable settlement which will be the main focus of proportionate housing development. Based on the views from the Questionnaire and responses from residents at the Options Days, this draft NDP proposes a settlement boundary for Tillington in order to retain some control over future development, on which comments are invited from the community.</p> <p>The Herefordshire Core Strategy identifies Tillington as a sustainable settlement which will be the main focus of proportionate housing development. All potential development sites were displayed at the Options Days in Autumn 2014. Visitors were invited to comment. The comments were taken into account by the Parish Council when assessing the sites and allocating for development.</p> <p>Whilst the questionnaire returns favoured sites of 4-7 dwellings (40%) more than 8-10 dwellings (33%), the Herefordshire Core Strategy proposes development at an indicative rate of 30 dwellings per hectare. The Burghill NDP is required to be in general conformity with the Herefordshire Core Strategy and cannot be overly restrictive on future growth.</p> <p>See response to point 3 above</p> <p>Proposed housing sites put forward were assessed through the Site Assessment process. The most favourable were brought forward into the NDP as housing allocations.</p>	

Ref No	Comments	PC Comments	Amendments to NDP
	<p>populated areas in the parish so this housing density is completely disproportionate.</p> <p>6. Tillington has no infrastructure so these sites are unsustainable.</p> <p>7. The massive development at Tillington threatens the water quality of the River Lugg because there is no infrastructure.</p> <p>8. Site 10 is on an elevated position and will have a terrible detrimental effect with flooding all the way down to Crowmore Lane, to The Bell and at the rear at Domino Corner. Not taking these material planning considerations into account when selecting sites smacks of bias when the main growth village of Burghill has been protected and yet has all the infrastructure available. B) Because of the elevation the impact of the housing towering above will also have a detrimental visual impact on the neighbouring area.</p> <p>9. As residents we do not want mains sewerage brought to facilitate this development so some people will line their pockets which will, along with the settlement boundary, only encourage more development which the residents of this area do not want and have who have not been consulted. And no doubt, judging by the bias already shown, Tillington will then continue to be the dumping ground for Burghill's housing which let me remind you is the main growth village – the only one.</p> <p>10. This plan appears to have been drawn up to ensure all development is steered clear of Burghill which is appalling considering the viable sites and natural extensions surrounding Burghill that were put forward</p>	<p>The plan area falls within the sub catchment of the River Wye (including Lugg) Special Area of Conservation (SAC). This is protected by Herefordshire Core Strategy Policies SS6 and LD2</p> <p>A strategy to alleviate any flooding/surface water drainage and foul drainage will have to be submitted with any planning application for the site. This could result in environmental benefits to the existing residents.</p> <p>The Herefordshire Core Strategy identifies both Burghill and Tillington as sustainable settlements which will be the main focus of proportionate housing development. All potential development sites were displayed at the Options days in Autumn 2014. Visitors were invited to comment. The</p>	

Ref No	Comments	PC Comments	Amendments to NDP
	<p>and completely ignored by the Steering Group...but in this case maybe you should rename yourselves the "Steering away Group". It is no surprise there is no one representing Tillington on the Steering Group.</p> <p>11. The proposed development is completely DISPROPORTIONATE and the residents HAVE NOT BEEN CONSULTED AT ALL.</p>	<p>comments were taken into account by the Parish Council when assessing the sites and allocating for development.</p> <p>See response at beginning of this section (44)</p>	
45	Comments as above and (Text removed *****)	Response as above	No change
46	Comments as above and (Text removed *****)	Response as above	No change
47.1	<p>(Text removed *****)</p> <p>INADEQUATE CONSULTATION TO THE COMMUNITY:</p> <p>1) ONLY 100 out of 1600 parishioners attending a public meeting in BURGHILL (not Tillington or Lower Burlton) announcing the BPC would be doing a NDP and Questionnaire.</p> <p>2) Distribution of a questionnaire the report not publicised and only available from the BPC website. A questionnaire that has been subsequently ignored.</p> <p>3) Options' Days over 2 days in November 2014 at the BURGHILL village hall with the obvious bias towards Burghill residents that could easily walk to the event where parishioners could select their preferred sites and draw 2 settlement boundaries with no information regarding this ever published.</p> <p>4) THEN NOTHING FOR ONE YEAR with NO COMMUNITY CONSULTATION OR ENGAGEMENT until the actual Draft Plan is published with sites having been selected, housing allocations made, and remarkably a third settlement boundary for Tillington being imposed with no consultation even though it states in Para 3.34: "The analysis of the opinions expressed regarding Settlement Boundaries was no so comprehensive and could not be used to make an</p>	<p>The Parish Council have carried out consultation from September 2013 to present.</p> <p>An awareness raising meeting was held in March 2014 which was publicised around the Parish.</p> <p>720 questionnaires were distributed throughout the Parish with a response rate of 63%.</p> <p>The Options Days were advertised on the Parish website, community magazine, posters and on a flyer delivered to every household.</p> <p>Following the Option Days consultations, the Steering Group concentrated their efforts on producing a draft plan that took into account the residents views wherever possible.</p> <p>As part of this consultation, comments have been invited from residents on the draft NDP</p>	No change

Ref No	Comments	PC Comments	Amendments to NDP
	<p>informed judgement on their appropriateness.” and then straight to Regulation 14. (Text removed *****)</p>		
47.2	<p>PARA 3: NOT all of the views of parishioners have been taken into account when preparing this plan and state otherwise is a gross misrepresentation.</p> <p>PARA 5: Once again there is bias as regards the comments forms being only available at the Burghill Village Hall and Burghill Gold Club. This is totally inadequate only making easy access to forms available to residents of Burghill.</p> <p>Why weren't comment forms made available to Lower Burlton, Tillington and Tillington Common? (Text removed *****)</p> <p>The online comment form is overcomplicated with needless required fields: page number, paragraph number, and policy number that if not filled in does not allow any body text. I would like to think it was not done deliberately as a disincentive but because of my knowledge about this entire shoddy process I do have to question why a simple comments form could not have been provided. (Text removed *****)</p>	<p>The Paragraph states that the views of parishioners have been taken into account which is a statement of fact.</p> <p>Burghill is most central within the Parish with more facilities for forms to be available.</p> <p>The online form enabled the relevant fields to be completed as required by the process.</p>	No change
47.3	<p>Page Number 8 Paragraph Number 2.5</p> <p>STATEMENT: “The village of Burghill is the main component of the developed area for housing within the parish...”</p> <p>Then why has this been completely ignored with so little housing going to Burghill that is proportionate and a disproportionate amount of housing been allocated to Tillington? (Text removed *****)</p>	<p>This is a statement of the existing character of the Parish.</p> <p>See comment to 44 above</p>	No change

Ref No	Comments	PC Comments	Amendments to NDP
47.4	Page Number 10 Paragraph Number 2.12 STATEMENT: "...at Tillington there is a fairly compact housing group clustered near the highway cross at Whitmore, near the Bird Pool..." (Text removed *****)	See comments to 44 above	No change
47.5	Page Number 10 Paragraph Number 2.13 STATEMENT: "The dwellings of Tillington Common form no consolidated group." (Text removed *****)	It is correct that there is a building group within the Tillington Common area. However, there are also several groups and single dwellings spread along the main route around the common. It is for this reason that the terminology at Para 2.13 is used	No change
47.6	Page Number 12 Paragraph Number 2.21 STATEMENT: "To the rear of the buildings there is land which is used in conjunction with the business zone for open commercial storage." (Text removed *****) The land behind the commercial units is GREENFIELD so it cannot be being used as open commercial storage. STATEMENT PARAGRAPH 6.1.24: "Site 10 – Tillington Business Park – Brownfield." (Text removed *****)	Part of the land to the rear of the Business Park within Site 10 has been previously used as part of the Business Park and is considered as Previously Developed Land.	No change.
47.7	Page Number 15 Paragraph Number 2.34 STATEMENT: "However, these land designations are not regulatory, so they do not impose an embargo on development. With the right type of mitigation, substitute planting, land management or species protection to ensure no net loss of biodiversity within the county, development could still be permitted." (Text removed *****) These sites and their indigenous wildlife should be protected at all costs! (Text removed *****)	Whilst Habitats of Principal Importance are not a statutory designation, they are a material consideration in the determination of any future planning application. The effect of proposed development on wildlife will be assessed at Planning Application stage through supporting documentation submitted.	No change

Ref No	Comments	PC Comments	Amendments to NDP
47.8	<p>Page Number 16 Paragraph Number 3.7 STATEMENT: When asked what they viewed as an acceptable increase in the parish 79% of households gave one of the first three answers, namely 1%-5%, 5%-10% or 10%-15%. The most common answer was 5%-10%. THE VAST MAJORITY 64% wanted less than 10% growth – THEY WANTED LESS THAN 70 HOUSES. Combine that with below 15% growth it becomes 79%. Both are enormous percentages. (Text removed *****)</p>	<p>The Herefordshire Core Strategy identifies Tillington as a sustainable settlement which will be the main focus of proportionate housing development, with a figure of 18% growth proposed for the Hereford Housing Market Area (Policy RA1).</p> <p>For the Burghill NDP to progress, it is required to be in “general conformity” with the Herefordshire Core Strategy</p>	No change
47.9	<p>Page Number 19 Paragraph Number 3.12 STATEMENT: The community considered that 4-7 dwellings per site (40% of households), was an ideal site, with 8-10 dwellings per site having a response rate of 33%. Text removed ***** OVERALL MAJORITY WANTED SITES CONTAINING 1-7 DWELLINGS. (Text removed *****)</p>	<p>Whilst the questionnaire returns favoured sites of 1-3 (13%) 4-7 dwellings (40%) more than 8-10 dwellings (33%), the Herefordshire Core Strategy proposes development at an indicative rate of 30 dwellings per hectare ensuring the sustainable use of land. The NDP has to be in “general conformity” with the Herefordshire Core Strategy in order to progress further and become part of the Development Plan for the area.</p>	No change
47.10	<p>Page Number 22 Paragraph Number 3.19/20 (Text removed *****)</p>	<p>Burghill is most central within the Parish with more facilities for available for the NDP to be available. Copies were available on the Burghill website the entire duration of the consultation period.</p>	No change
47.11	<p>Page Number 24 Paragraph Number 3.29 (Text removed *****)</p>	No comment	No change
47.12	<p>Page Number 25 Paragraph Number 3.33 STATEMENT: “In addition, opinions were sought on the settlement boundaries, whether these should be amended and if so which areas should or should not be included.” (Text removed *****)</p>	<p>The Herefordshire Core Strategy identifies Tillington as a sustainable settlement which will be the main focus of proportionate housing development. Based on the views from the Questionnaire and responses from residents at the Options Days, this draft NDP proposes a settlement boundary for Tillington in order to retain some control over</p>	No change

Ref No	Comments	PC Comments	Amendments to NDP
		future development, on which comments are invited from the community.	
47.13	<p>Page Number 25 Paragraph Number 3.34</p> <p>STATEMENT: "Some 5161 pieces of information were analysed and recorded including over a 1000 comments indicating valid concerns or alternatively support for individual sites." (Text removed *****)</p> <p>STATEMENT: "The analysis of the opinions expressed regarding Settlement Boundaries was not so comprehensive and could not be used to make an informed judgement on their appropriateness." (Text removed *****)</p>	The Options Days results were analysed by the Steering Group and Parish Council and the Options Days reports were used to inform the development of the Burghill NDP	No change
47.14	<p>Page Number 29 Paragraph Number 5.5</p> <p>STATEMENT: "The policies in the Burghill Neighbourhood Development Plan have been developed to take account of the key issues in Burghill Parish, and to achieve the aim and objectives in Section 4."</p> <p>Developed by whom? As none of the information from the questionnaire has been made available to the community, nor has the community been consulted on that information, it is logical to assume that these policies and objectives are solely the construct of the Steering Group so therefore cannot represent the views of the community.</p>	<p>The Questionnaire results were analysed by an independent organisation, Gloucestershire Rural Community Council (GRCC), and a report was presented to Burghill Parish Council.</p> <p>The results of the Option Days feedback were formulated into reports for each area.</p> <p>The Burghill NDP was formulated around the results of the community consultations and the requirement to be in general conformity with the Herefordshire Core Strategy.</p>	No change
47.15	<p>Page Number 33 Paragraph Number 6.1.16 (Text removed *****) Text relates to Core Strategy Main modifications</p>	The Herefordshire Core Strategy is now the adopted policy for the County. Whilst the 18% growth is an indicative figure across the Hereford HMA, a lower figure is only likely to be acceptable where there are significant constraints within a particular settlement and this can be evidenced.	No change

Ref No	Comments	PC Comments	Amendments to NDP
		There are no specific issues identifiable with Burghill or Tillington	
47.16	<p>Page Number 33 Paragraph Number 6.1.17</p> <p>STATEMENT: "Figure 4.14 of the Core Strategy continues to identify both Burghill and Tillington as growth areas. The PC has previously agreed that growth should be confined to Tillington and not Tillington Common which is perceived to be an unsustainable countryside location for new development, as confirmed by previous planning decisions."</p> <p>(Text removed *****)</p>	The comments submitted relate to the Herefordshire Core Strategy examination process.	No change
47.17	<p>Page Number 33 Paragraph Number 6.1.17</p> <p>Repeat of above</p> <p>(Text removed *****)</p>	As above	No change
47.18	<p>Page Number 34 Paragraph Number 6.1.19</p> <p>STATEMENT: In the parish there is the potential for about 20 dwelling sites to come forward from sites known as windfalls. These are sites which might not have been previously known, sites for single dwellings, changes in existing planning permissions or conversions to existing buildings. Some of these sites are already under discussion or planning applications have been made.</p> <p>The definition of Windfalls according to the Core Strategy (and National Planning Policy Framework) Glossary is: "Sites which have not been specifically identified as available in the Local Plan process".</p> <p>Out of the 20 "Windfalls" in the NDP 14 are already known about and do not fall into the definition according to the Core Strategy. THEY ARE NOT WINDFALLS. This is</p>	<p>The Parish Council consider that as the windfall sites are within open countryside, they are not appropriate for allocation in the Burghill NDP.</p> <p>However, should they come forward as planning applications, they will be assessed against the Herefordshire Core Strategy Policies for development in open countryside.</p>	No change

Ref No	Comments	PC Comments	Amendments to NDP
	<p>ludicrous! Those 14 should be identified separately as allocations and then 20 true windfalls included in the provision. The total for new housing is then reduced substantially.</p> <p>NOW CONSIDER THIS AS AN ALTERNATIVE:</p> <p>Conversions/houses that have been submitted to the Neighbourhood Plan process that have been completely ignored by the BPC that could be allocated because they are clearly not windfalls as they are known about:</p> <ul style="list-style-type: none"> • 6 conversions at Hospital Farm Buildings • 2 houses on land at rear of the Villa Burghill • 1 conversion at Court Farm Hop Kilns • 1 equestrian business house at Tillington • 3 conversions at Field Farm on Credenhill Rd, Tillington • 1 house at Rose Farm, Tillington Common • 1 house adj Elm Cottage Tillington Common • 1 house adj Old Chapel Tillington Common • Piggery redevelopment for 5 houses refused but the NP could have included say 3 houses (10 were submitted to NP) and allocated them in it. <p>That is 19 in total! None of which would have an adverse effect on the parish.</p> <p>Then also there are the outstanding applications:</p> <ul style="list-style-type: none"> • Still to be determined – 20 houses near St Mary’s; • Still to be determined – 50 houses at junction Tillington Road/Roman Road in Lower Burlton; • Still to be determined – 2 conversions at Fruit Farm Cold Store • Still to be determined – 1 conversion at Fruit Farm Office • (The 3 conversions should happen and the NP ought to support and include them.) 		

Ref No	Comments	PC Comments	Amendments to NDP
	<p>Less commitments completions and permissions 2011-2014 = 19 Less permissions April 2014 to date not included in the above: 1 house after Appeal at 24 Hospital Houses, St Mary's; 24 at Pyefinch, 2 conversions at Parks Farm over and above the 2011-2014 permissions, 1 conversion at the Gospel Hall, 3 conversions at Tillington Fruit Farm = 31 Then an allowance for future windfalls at 16% which is a dreadfully under-estimated figure. But using is as a minimum as a basis for future windfalls = 20 Therefore, that makes a running total 19 + 3 + 19 + 31 + 20 = 106 123 - 92 = 31 new builds to find. That is how easy it is to allocate housing when there isn't an agenda to develop Tillington!!!</p> <p>31 new dwellings could easily be proportionately distributed throughout the parish. (Text removed *****)</p>		
47.19	<p>Page Number 34 Paragraph Number 6.1.23 STATEMENT: "Additional information is inserted into the tables from the Options Days scores where the sum of the %'s both in favour and neutral is shown." (Text removed *****)</p>	No comment	No change
47.20	<p>Page Number 35 Paragraph Number 6.1.24 STATEMENT: The result of this process is that 7 undeveloped sites and one previously developed site came out as the most favoured. (Text removed *****)</p>	See comments at 44	No change
47.21	<p>Page Number 35 Paragraph Number 6.1.26</p>	See response to 47.9 above	No change

Ref No	Comments	PC Comments	Amendments to NDP
	<p>STATEMENT: "The sites that are shown within the possible settlement boundaries at Burghill, Tillington and Lower Burlton have the potential to meet the housing requirement imposed on the Parish by the Core Strategy and demonstrate alignment with its policies. Furthermore, they have the potential to achieve this growth at a modest housing density, in line with the aspirations of parishioners and which would also reflect the character and appearance of the parish."</p> <p>Nonsense! The BPC has completely ignored "the aspirations of parishioners" of who over half preferred 1-7 houses where the BPC has imposed 10-12 houses without any consultation. (Text removed *****)</p>		
47.22	<p>Page Number 35 Paragraph Number 6.1.27</p> <p>STATEMENT: "The BPC notes the returns from the questionnaire which favoured the designation of a settlement boundary for Tillington Common, however, it was considered that the definition of a settlement boundary for the Tillington Common Area would be inappropriate. The housing layout in the Tillington Common area has a limited identifiable core." (Text removed *****)</p>	<p>The Herefordshire Core Strategy identifies Tillington as a sustainable settlement which will be the main focus of proportionate housing development. Tillington Common is not included in either of the Tables in the Core Strategy (4.14 and 4.15) and is therefore designated as open countryside.</p>	No change
47.23	<p>Page Number 35 Paragraph Number 6.1.28</p> <p>STATEMENT: "The housing here is well spread out with significant gaps between either individual groups of dwellings or single dwellings. The Parish Council considers the Tillington Common area is a countryside location with no defined identifiers as a village in the normal sense." (Text removed *****)</p>	<p>The Herefordshire Core Strategy identifies Tillington as a sustainable settlement which will be the main focus of proportionate housing development. Tillington Common is not included in either of the Tables in the Core Strategy (4.14 and 4.15) and is therefore designated as open countryside.</p>	No change

Ref No	Comments	PC Comments	Amendments to NDP
47.24	<p>Page Number 36 Paragraph Number 6.1.29</p> <p>STATEMENT: "Furthermore, it is considered to be an unsustainable location for new development due to lack of services and infrastructure. Therefore, development proposals within this area should be governed by the normal core strategy planning policy constraints for development in the countryside beyond a settlement boundary, as set out in Herefordshire Core Strategy Policy RA3."</p> <p>YOU ARE DESCRIBING TILLINGTON AGAIN!!! (Text removed *****)</p> <p>Tillington is as it always has been: in the countryside and therefore "...development proposals within this area should be governed by the normal core strategy planning policy constraints for development in the countryside beyond a settlement boundary, as set out in Herefordshire Core Strategy Policy RA3." applies.</p>	<p>The Herefordshire Core Strategy identifies Tillington as a sustainable settlement which will be the main focus of proportionate housing development. Tillington Common is not included in either of the Tables in the Core Strategy (4.14 and 4.15) and is therefore designated as open countryside.</p>	No change
47.25	<p>Page Number 36 Paragraph Number 6.1.30</p> <p>STATEMENT: "Policy B1, in addition to the site assessment process, and the allocation of sites seeks to achieve Objectives 1 and 2 identified in paragraph 6.1.1"</p> <p>Paragraph 6.1.1 states: "To establish criteria for new housing such as the size of developments, sustainability...."</p> <p>Where are the criteria? Not published?</p> <p>STATEMENT: "Possible housing sites at a low density as preferred by Options Day returns"</p> <p>(Text removed *****)</p> <p>Currently the housing density at Tillington is 7 dwellings per hectare and any development should align with that. (Text removed *****)</p>	<p>The criteria are within Policy B1 and other relevant policies within the Burghill NDP</p> <p>The Herefordshire Core Strategy proposes development at an indicative rate of 30 dwellings per hectare to ensure the sustainable use of land. The Burghill NDP proposes within B1 (a) that development should maintain and appropriate density in context with the immediate surrounding area. To specify a specific density for a development can be seen to prevent sustainable development and would therefore not be consistent with National Policy.</p>	No change

Ref No	Comments	PC Comments	Amendments to NDP
	<p>All the sites at Tillington have been “preferred” without including these important material planning considerations. It is ludicrous.</p> <p>1. None of the Tillington sites have access or inadequate access with visibility issues and safety issues that the planning office confirmed when the site owner’s application for an access into site 10 was rejected on the advice the Highway’s Department that visibility was totally inadequate and could not be met.</p> <p>2. The higher elevation will cause surface flooding and environmental pollution of the River Lugg Catchment.</p> <p>3. No mains sewerage or mains drainage. 3 million litres of waste water will have a catastrophic effect on current residents where flooding of septic tanks is already a problem and flooding of properties and roads.</p> <p>4. No footpaths. (Text removed *****) And besides this plan is already redundant. With the 50 houses under Planning Application on the corner of Tillington Road and Roman Road; 20 at St Mary’s Park, 7 at Tillington Fruit Farm, those account for a considerable number of all the housing allocation. Text removed *****)</p>	<p>The sites were scored in accordance with a specific methodology and scoring system identified in the Site Assessment report. The issues identified will be assessed during the planning application process.</p> <p>Whilst a planning application has been submitted, the Parish Council consider it expedient to submit the Burghill NDP with its current allocation of sites as soon as possible. Once submitted, the NDP becomes a material consideration in the determination of planning applications, enabling the Parish to have some control over future development. Tillington Fruit Farm is open countryside. Should a planning application be approved at the site, this would be a windfall site. St Marys Park was refused by Herefordshire Council and dismissed at appeal.</p>	
47.25	<p>Page Number 37 Paragraph Number n/a STATEMENT: Policy B1 - Scale and type of new housing in Burghill and Tillington and Lower Burlton.</p> <p>But for Tillington you have just ignored this policy in:</p>	<p>Proposed housing sites put forward were assessed through the Site Assessment process. The most favourable were brought forward into the NDP as housing allocations.</p> <p>The sites were scored in accordance with a specific methodology and scoring system identified in the Site Assessment report. The issues identified will be assessed during the planning application process.</p>	No change

Ref No	Comments	PC Comments	Amendments to NDP
	<p>(a) Maintains an appropriate density in context with the immediate surrounding area and not exceeding 25 dwellings per hectare; - IGNORED</p> <p>(b) Ensures appropriate and safe access; - IGNORED</p> <p>(c) Ensures adequate access to public transport facilities; - IGNORED</p> <p>(g) Reflects the scale and function of the settlement; - IGNORED</p> <p>Development in open countryside including conversion of rural buildings will be in accordance with the relevant Herefordshire planning policies. - IGNORED</p> <p>(Text removed *****)</p>		
47.26	<p>Page Number 53/54/56 Paragraph Number 6.6.15 Policy Number B10 Map 6 PAGE 66 MAP 6 DESIGNATED LOCAL GREEN SPACES Paragraph 77 of the NPPF and Paragraph 6.6.15 of the Draft Plan states: "Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used...where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife." Paragraph 76 of the NPPF states: "identifying land as Local Green Space should therefore be consistent with the local planning of sustainable development."</p> <p>This projects supposed green space across the eastern end of Bakers Furlong which blocks access to Site 35 (a viable sustainable development site adjacent to Burghill settlement boundary) owned by Farmcare that they submitted for possible housing. This is in contravention of Paragraph 77 of the NPPF.</p>	<p>The Local Green Space has been extended beyond that identified in the Herefordshire UDP as Open Areas and Green Space to reflect what is actually evident on site.</p>	No change

Ref No	Comments	PC Comments	Amendments to NDP
	(Text removed *****)	Site 35 was not identified as a sustainable site to be brought forward into the Burghill NDP through the Site Assessment process.	
47.27	<p>Page Number 37/40/41 Paragraph Number Policy Number B1/B3/B4 Page No: 37 Policy No: B1 (a) The density figure in (a) is too vague and must be changed to be: "not exceeding the average housing density of the existing properties in the settlement boundaries excluding allocated sites".</p> <p>Page No: 40 Policy No: B3 All the statements contained in Policy B3/B4 are too vague and should be corrected.</p> <p>(c) Please use the Core Strategy words from Policy RA6 Rural Economy: "(c) ensure that the development is of a scale which would be commensurate with its location and setting;</p> <p>(d) Please use the Core Strategy words from Policy RA6 Rural Economy: "(d) do not cause unacceptable adverse impacts to the amenity of nearby residents by virtue of design and mass, noise and dust, lighting and smell;"</p> <p>(f) Please use the Core Strategy words from Policy RA6 Rural Economy: "(f) do not generate traffic movements that cannot safely be accommodated within the local road network"</p> <p>Water quality is vitally important considering Burghill Parish lies within the catchments of the River Lugg and River Wye. Therefore, it is essential to add the following which is from Policy RA6 of the Core Strategy: "(g) do not</p>	<p>(a) The density figure is included as a maximum. It is clear from Ordnance Survey maps that densities in the two settlements (Burghill and Tillington) fall far short of 25 dwellings per hectare, and future development in context with the surrounding area should reflect this.</p> <p>(c) The wording in the NDP reflects aim of the wording in Policy RA6 and should remain.</p> <p>(d) The wording in the NDP reflects aim of the wording in Policy RA6 and should remain.</p> <p>(f) The wording in the NDP reflects aim of the wording in Policy RA6 and should remain.</p> <p>This is covered by Herefordshire Core Strategy Policy SD3. The is no need to duplicate higher level policies within the Burghill NDP.</p>	No change.

Ref No	Comments	PC Comments	Amendments to NDP
	<p>undermine the achievement of water quality targets in accordance with Core Strategy Policies SD3 and SD4.”</p> <p>Then (g) existing therefore becomes (h)</p> <p>Page No: 40 Policy No: B4 (b) Please replace with the words from Core Strategy RA6: “(b) (The proposed use will not) cause unacceptable adverse impacts to the amenity of nearby residents by virtue of design and mass, noise and dust, lighting and smell;”</p>	<p>(b) The wording in the NDP reflects aim of the wording in Policy RA6 and should remain.</p>	
47.28	<p>Page Number 47/48/49 Paragraph Number n/a/6.5.9/n/a Policy Number B8/n/a/B9</p> <p>STATEMENT: “It does not result in backland development which has a detrimental impact on the character of the village.”</p> <p>STATEMENT: “The Parish Council and the residents of the Parish consider it important to protect the character and setting of Burghill, the other housing groups within the parish and the surrounding landscape.”</p> <p>STATEMENT: “(b) Development proposals should seek to preserve and where possible enhance the character of the village.”</p> <p>Once again the bias is demonstrated in apportioning of importance to Burghill and not Tillington or Lower Burlton. (Text removed *****)</p>	<p>Amend (b) to make village plural</p>	<p>Amend Policy B9(b) to make village plural.</p>
47.29	<p>Page Number 55 Paragraph Number 6.7.3/6.7.4</p> <p>STATEMENT: “6.7.3 Policy SD4 of the Herefordshire Core Strategy states that</p>	<p>With regard to infrastructure, new development will be expected to incorporate drainage arrangements as part of the Planning Process. See notes 5 and 7 above</p>	<p>No change</p>

Ref No	Comments	PC Comments	Amendments to NDP
	<p>development should not undermine the achievement of water quality targets for rivers within the county, in particular through the treatment of wastewater. STATEMENT: "6.7.4 In the first instance developments should seek to connect to the existing mains wastewater infrastructure network. Where this option would result in nutrient levels exceeding conservation objectives targets, in particular additional phosphate loading within a SAC designated river, then proposals will need to fully mitigate the adverse effects of wastewater discharges into rivers caused by the development." Allocating the huge development of 24 houses at Tillington WILL "undermine the achievement of water quality targets for rivers" and WILL add "additional phosphate loading within a SAC designated river". There is NO MAINS SEWERAGE OR MAINS DRAINAGE at Tillington so this is evitable. (Text removed *****)</p>		
47.30	<p>Page Number 60 Paragraph Number 8.2 STATEMENT: "Where the need for change is identified the Parish Council will work with Herefordshire Council to produce updates and amendments where necessary." AND WHAT ABOUT THE COMMUNITY DECIDING? (Text removed *****)</p>	<p>When the Burghill NDP reaches the end of the process it will become part of the development plan for the area for the plan period until 2031.</p> <p>When the Core Strategy is reviewed it is expected that the Burghill NDP will form part of that process.</p> <p>Currently there is no process in place for any review of an NDP without going through the whole process from the beginning</p>	No change
47.31	<p>STATEMENT: Proposed design standards derived from questionnaire responses and Steering Group members are set out below.</p> <p>LOCATION criteria:</p>	<p>The Design guidance was derived from the questionnaire responses and the knowledge and guidance of both the Steering Group Member and the Parish Council.</p>	

Ref No	Comments	PC Comments	Amendments to NDP
	<p>SO WHERE IS THE COMMUNITY INVOLVEMENT IN ESTABLISHING THESE CRITERIA?</p> <p>Text removed *****)</p> <p>INFRASTRUCTURE</p> <p>No mention of SURFACE FLOODING. Text removed *****)</p> <p>THIS IS IMPORTANT with the propensity for Tillington to flood that has NO INFRASTRUCTURE. Text removed *****) Text to be added</p> <p>"For developments in areas which do not have mains sewage or mains drainage, waste water discharges should be to a package sewage treatment works in the first instance, alternatively (and only where appropriate) to a septic tank, in both cases discharging to soakaway (not to a watercourse, due to the need to recover or maintain good river water quality). Phosphates strippers must be fitted to all new package sewage treatment works/septic tank installations (again due to the need to recover or maintain good river water quality). Planning applications must provide independent evidence that water discharges will not cause additional surface water flooding which affects the amenity of other properties or prevents the proper function of their septic tanks; nor cause additional surface flooding on nearby highways. Developers may be required to contribute to works which prevent additional surface flooding, and in some cases where existing flooding is unacceptable, to remediate that too before their development can be allowed to proceed."</p> <p>LAYOUT AND SIZE OF DEVELOPMENT</p>	<p>The proposed wording promotes too much detail. These issues are adequately covered by existing Herefordshire Core Strategy policies.</p>	

Ref No	Comments	PC Comments	Amendments to NDP
	<p>STATEMENT: "Housing density shall be no more than 25 dwellings per hectare including all works required for access, public utilities, infrastructure and vehicle parking"</p> <p>THIS IS THE COMMUNITY'S PLAN so why include such an absurdly high figure of "25 dwellings per hectare"? The only people that will benefit from this are developers but maybe that is the intention here.</p> <p>The current densities are for Tillington 7 dwellings per hectare and for Burghill 10.5 dwellings per hectare so why triple and almost quadruple that for Tillington? PROTECT THIS COMMUNITY!!!</p> <p>But because Pyefinch sets a precedent of 14 dwellings for hectare equivalent to a 33% increase then can gives 9 dwellings per hectare for Tillington and Tillington Common. And at Lower Burlton where the current density is 17 dwellings within the current settlement boundary which equates to 22 dwellings per hectare.</p> <p>Therefore, using a logical basis, consistent with maintaining the existing character of localities, the first proposed design standard in this section should be modified to read:</p> <p>"New Housing density shall be no more than 14 dwellings per hectare in Burghill; 9 dwellings per hectare in Tillington and Tillington Common; and 22 dwellings per hectare in Lower Burlton including all works required for access, public utilities, infrastructure and vehicle parking"</p> <p>THIS IS IMPORTANT!!!</p>	<p>The Herefordshire Core Strategy proposes development at an indicative rate of 30 dwellings per hectare to ensure the sustainable use of land. The Burghill NDP proposes within B1 (a) that development should maintain and appropriate density in context with the immediate surrounding area.</p> <p>The density figure is included as a maximum. It is clear from Ordnance Survey maps that densities in the two settlements (Burghill and Tillington) fall far short of 25 dwellings per hectare, and future development in context with the surrounding area should reflect this.</p>	

Ref No	Comments	PC Comments	Amendments to NDP
	<p>STATEMENT: "Housing groups within development projects shall not exceed 10 dwellings."</p> <p>Why? To fit in and justify the disproportionate development allocated at Tillington? Who decided this? Oh we don't know! The questionnaire was clear the majority preferring 1-7 dwellings per site. Therefore, this should be changed to:</p> <p>"Housing groups within development projects shall not exceed 7 dwellings."</p> <p>STATEMENT:</p> <ul style="list-style-type: none"> • At least 35% of the dwellings shall be affordable housing and shall be dispersed throughout market housing • Not more than 2 affordable homes shall be either linked or • neighbouring dwellings (to ensure the integration of affordable and • market housing within development projects) • Not more than 3 dwellings shall be linked in a terraced layout • <p>WHO DECIDED THIS? WHERE IS THE PROPER CONSULTATION?</p> <p>SIZE OF DWELLING</p> <ul style="list-style-type: none"> • New dwellings should have a minimum internal floor area of 80 sq.m where possible. • Development sites shall comprise not more than 10% of 5 bedroom dwellings, not more than 60% of 3 or 4 bedroom dwellings and the remainder shall be 2 or 1 bedroom dwellings 	<p>Whilst the questionnaire returns favoured sites of 4-7 dwellings (40%) more than 8-10 dwellings (33%), the Herefordshire Core Strategy proposes development at an indicative rate of 30 dwellings per hectare. The Burghill NDP is required to be in general conformity with the Herefordshire Core Strategy and cannot be overly restrictive on future growth.</p> <p>The percentage rate is set by the Herefordshire Core Strategy subject to viability. With regard to the further criteria this is to enable market and affordable dwellings to be interspersed on a site.</p> <p>The Parish Council consider the inclusion of a minimum floor space for dwellings a necessity to ensure the dwellings that are constructed in the Parish are fit for purpose.</p> <p>The further criteria are included to guide the size of dwelling to that which is appropriate to the Parish.</p>	

Ref No	Comments	PC Comments	Amendments to NDP
	<ul style="list-style-type: none"> At least 15% of dwellings should be single storey ground floor building <p>WHY? WHO DECIDED THIS? ARBITRARY NUMBERS THAT ARE MEANINGLESS. WHERE IS THE PROPER CONSULTATION?</p> <p>SITE SPECIFIC FEATURES</p> <p>STATEMENT: "Permitted development rights for outbuildings, extensions, additions and conservatories shall be withdrawn on sites for new housing." (Text removed *****)</p>		
47.32	<p>Page Number 64</p> <p>MAP 4 Tillington proposed settlement boundary including Tillington Business Park</p> <ol style="list-style-type: none"> THE PARISH COUNCIL HAS NOT ADEQUATELY PURSUED THE EXCLUSION OF TILLINGTON FROM THE HEREFORDSHIRE COUNCIL VILLAGE LIST. AGREEING TO HAVE A STATEMENT OF COMMON GROUND INCLUDED IN THIS DRAFT PLAN TO TARGET TILLINGTON FAILS THE PEOPLE OF TILLINGTON AND HAS BEEN IMPOSED WITHOUT ANY CONSULTATION. THERE HAS BEEN NO CONSULTATION ON THIS SETTLEMENT BOUNDARY THAT THAT SOMEONE HAS WILFULLY DRAWN TO FACILITATE THE AGENDA TO DEVELOP TILLINGTON. THROUGHOUT THIS PLAN TILLINGTON BUSINESS PARK HAS BEEN THE FOCUS BY THE ALLOCATION OF A MASSIVE ESTATE THAT CENTRES ON SAID BUSINESS PARK. THE 4 ACRES OF TILLINGTON BUSINESS PARK THROUGHOUT THIS PROCESS HAS BEEN WRONGLY 	<p>Each of these issues have been addressed in responses above. (47.1-47.31)</p>	<p>No change</p>

Ref No	Comments	PC Comments	Amendments to NDP
	<p>ATTRIBUTED AS BROWNFIELD WHEN ONLY THE SOUTHERN PART THAT INCLUDES THE COMMERCIAL UNITS COULD BE CLASSED AS THAT. IT IS DELIBERATE TO INFLUENCE PUBLIC OPINION AND GAIN A HIGHER RANKING.</p> <p>6. THERE HAS BEEN NO CONSULTATION ON HOUSING, DENSITIES, ALLOCATIONS OR NUMBERS PER SITE, EVERYTHING HAVING BEEN DECIDED BEHIND CLOSED DOORS.</p> <p>7. THERE HAS BEEN NO CONSIDERATION MADE FOR THE LACK OF INFRASTRUCTURE. (Text removed *****)</p>		
48.1	<p>Page No.: 2</p> <p>The paragraph beginning 'The Draft Burghill Parish Neighbourhood Development Plan' states: 'The views of parishioners have been taken into account'. We have no way of knowing if the views of parishioners have been taken into account because parishioners have not been informed of the options days' comments or involved in discussing how to use those comments, or included in deciding how to move on from there. Parishioners do not know why each site has been chosen or ignored and neither do the site submitters. The basis upon which decisions have been made has not been shared or discussed.</p> <p>Parishioners have not been properly included in changing or making settlement boundaries (as is actually stated on Page 25 Paragraph 3.34 of Draft Neighbourhood Plan).</p> <p>It is clear that the views of parishioners cannot have been taken into account, so please insert 'NOT' between 'have' and 'been', i.e.: 'The views of parishioners have NOT been taken into account',</p>	<p>The Parish Council have carried out consultation in accordance with the Neighbourhood Planning Regulations. This has included a questionnaire and Options Days in October 2014. The Options Days were advertised on the Parish website, community magazine, posters and on a flyer delivered to every household.</p> <p>The Questionnaire results were analysed by an independent organisation, Gloucestershire Rural Community Council (GRCC), and a report was presented to Burghill Parish Council.</p> <p>The results of the Option Days feedback were formulated into reports for each area.</p> <p>The Burghill NDP was formulated around the results of the community consultations and the requirement to be in general conformity with the Herefordshire Core Strategy. Following the Option Days consultations, the Steering Group concentrated their efforts on producing a draft plan that took into account the residents views wherever possible.</p>	No change

Ref No	Comments	PC Comments	Amendments to NDP
		The current NDP is a draft document on which comments are invited from the community.	
48.2	<p>Page No.: 10 Paragraph No.: 2.12 There is NOT a 'fairly compact housing group clustered near the highway cross at Whitmore'. If you stand at the crossroads and look in all directions you can just make out five houses; one is Pen-y-Ploc, one belongs to Court Farm, one is Whitmore Pool Cottage and two belong to a resident. You can't see any others. In fact, there are only eighteen houses within the hurriedly drawn and not consulted upon settlement boundary in the draft neighbourhood plan, and they are 'interspersed with rural gaps and open land' (see Page 10 Paragraph 2.13) To be pedantic, there is no cross, Tillington Rd. is only a class 'C' road not the M6, no normal English speaking person would call it anything other than a crossroads, this is supposed to be OUR neighbourhood plan, please use plain English.</p>	No comments. The description of Tillington is from a plan view rather than street view.	No change

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

Ref No	Comments	PC Comments	Amendments to NDP
	<p>This is supposed to be a Plan for 2011-2031, not 1811-1831.</p> <p>Alternatively, if whoever wrote this wishes to insist on using this outdated pompous language, leave 'footway' and 'highway' as they are, but change all instances of 'car' to 'horseless carriage', and all instances of 'bus' to 'omnibus'.</p> <p>By the way, there are NO pavements (or footways) in Tillington.</p>		
48.5	<p>Page No.: 15 Paragraph No.: 2.34</p> <p>Burghill Parish Council should be determined to protect these habitats, and in doing so to protect parishioners from overdevelopment. If there is "a presumption against development" why is our NDP even mentioning "mitigation" and "substitute planting"? We don't have to give in to the developers and their agents, and should not be suggesting that we might.</p> <p>Delete the last 2 sentences of Page 15, Paragraph 2.34.</p>	<p>Whilst Habitats of Principal Importance are not a statutory designation, they are a material consideration in the determination of any future planning application.</p>	No change
48.6	<p>Page No.: 17 Paragraph No.: 3.7</p> <p>This is BIASED and ignores the majority. It should say: "When asked what they viewed as an acceptable increase in the Parish a majority (64%) gave one of the first two answers, wanting a total growth in housing numbers of 10% or below."</p>	<p>Whilst the questionnaire results identified that the majority of respondents wanted housing growth of 10%, the Herefordshire Core Strategy identifies Burghill and Tillington as sustainable settlements which will be the main focus of proportionate housing development, with a figure of 18% growth proposed for the Hereford Housing Market Area (Policy RA1).</p> <p>For the Burghill NDP to progress, it is required to be in "general conformity" with the Herefordshire Core Strategy.</p>	
48.7	<p>Page No.: 25 Paragraph No.: 3.33 "In addition, opinions were sought on the settlement boundaries, whether these should be amended and if so which areas should or should not be included."</p>	<p>The Herefordshire Core Strategy identifies Tillington as a sustainable settlement which will be the main focus of proportionate housing development. Tillington Common is not included in either of the Tables in the Core Strategy (4.14 and 4.15) and is therefore designated as open countryside.</p>	No change

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

Ref No	Comments	PC Comments	Amendments to NDP
	<p>Consultation should have been done according to paragraph 047 of the National Planning Practice Guidance with regard to Neighbourhood Planning</p>		
48.9	<p>Page No.: 26 Paragraph No.: 4.1 & Table Vision & Objectives</p> <p>In the questionnaire responses, "Over half (56%) of the 430 households who took part in the survey either disagree or strongly disagree that 18% growth in the parish would be an acceptable increase." And 64% considered that growth should be up to 10%. These were the first questions in the questionnaire and self-evidently the most important.</p> <p>The first objective should therefore be: "The appropriate level of housing growth in the parish should be up to 10%, consistent with the wishes of an overwhelming majority (64%) of households surveyed. "</p> <p>The objectives as listed do not reflect the emphases in the responses given by the community under the "Aims" section of the questionnaire. These objectives, which are a rewriting of those 'Aims' responses have not been consulted on. For example, "to support our local primary school" (number 4) may be a laudable objective, but it has been extracted from an "Aims" statement in the questionnaire "To support local facilities, such as the school, shop, pub, village hall, sport and leisure spaces, and reserve them for both present parishioners and future generations". The other facilities are still grouped together in the proposed Objectives (as objective number 5) but have been downgraded in comparison with the school. It is arguable that these other local assets are as important or more important to this community where more than half of the population (54% according to the 2011 Census) is over 45 years of age.</p>	<p>See response to 48.6 above</p> <p>The residents presented their views through the questionnaire process. The Vision and Objectives were presented to the public during the Options Days</p>	No change

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

Ref No	Comments	PC Comments	Amendments to NDP
	<p>The first objective should be: "To ensure that the level of housing growth in the parish for 2011-2031 should be up to 10%, consistent with the wishes of the overwhelming majority (64%) of households surveyed."</p>		
48.12	<p>Page No.: 31 Paragraph No.: 6.1.2 The statement "villages should have a target of 18% growth" is factually incorrect because it is not qualified. Core Strategy Policy RA 1 states that: "The indicative housing growth targets in each of the rural HMAs will be used as a basis for the production of neighbourhood development plans in the county. Local evidence and environmental factors will determine the appropriate scale of development." Local evidence was researched and summarised to facilitate a more appropriate level of growth - 11%, more consistent with the 10% deemed appropriate by the Questionnaire responses, but the Parish Council has not pursued this adequately, ignoring the clearly expressed wishes of the community. The Parish Council should pursue a 11% housing target, as Herefordshire Council allows it to do, depending on local evidence which we already have. If it fails to do this, it is just inviting developers to build 50 more houses than are necessary, which is not what Parishioners want.</p>	<p>See response to 48.6 above</p> <p>The Herefordshire Core Strategy is now the adopted policy for the County. Whilst the 18% growth is an indicative figure across the Hereford HMA, a lower figure is only likely to be acceptable where there are significant constraints within a particular settlement and this can be evidenced.</p>	No change
48.13	<p>Page No.: 31 Paragraph No.: 6.1.5 Policy No.: n/a Windfalls - As drafted, the figure of 20 windfalls includes not just future windfall provisions but also known sites for 1 to 3 houses/conversions which were submitted to the Neighbourhood Plan in 2014 as available. It is wrong to include known sites as windfalls. The clues are in the adjective "known" and the noun "windfall". Known sites cannot be windfalls. The following is required:</p>	<p>Potential sites of 1-3 dwellings have been included in this figure. Whilst sites are known about, it is uncertain as whether they will come forward. In order to allocate a site, it must be suitable, achievable and deliverable., it is therefore not appropriate to allocate the sites.</p>	No change

Ref No	Comments	PC Comments	Amendments to NDP
	<ul style="list-style-type: none"> • The known sites for 1 to 3 houses/conversions must be removed from the windfall provision, and included as allocated sites • The windfall provision will then be too low, and should be recalculated with the known sites excluded from it • The allocations for new house builds will then be too high, and should then be reduced 		
48.14	<p>Page No.: 31 Paragraph No.: 6.1.6</p> <p>From the Questionnaire we know that most parishioners wanted a housing increase of 10% or below over the Plan period.</p> <p>The commitment figure HAS ALREADY RISEN since this Plan was drafted (e.g. the Gospel Hall permission, and there are/will be others which will be able to be included before this Plan is finalised), and the commitment figure should be adjusted BEFORE the Plan is finalised for the referendum.</p> <p>By then, the 50 houses application at Lower Burlton may also have been approved, in which case it must be included too as a commitment, because it is within Burghill parish.</p> <p>The Parish Council is ignoring the wishes of the Parish for a lower housing increase of 10% by not including those sites in the NDP. This will reduce the number of new houses that we would still need to plan for.</p>	<p>The commitment figure is variable and the plan will be amended accordingly before submission.</p> <p>With regard to the 10% please refer to 48.6 above</p>	No change
48.15	<p>Page No.: 31 Paragraph No.: 6.1.7</p> <p>The Parish Council has failed the parishioners by not adequately challenging the gross error in the Core Strategy which named Tillington a main settlement when in fact it was TILLINGTON COMMON which had been assessed as a main settlement in the Rural Background Papers in 2009-2013.</p>	<p>The Parish Council represented these views during the Examination process for the Herefordshire Core Strategy. However, the Core Strategy has now been adopted with Burghill and Tillington being the named settlements as the focus for proportional growth.</p> <p>The NDP is not the vehicle for furthering the objections to the Core Strategy.</p>	No change
48.16	Page No.: 31 Paragraph No.: 6.1.9	See response to 48.1 above	No change

Ref No	Comments	PC Comments	Amendments to NDP
	<p>The Questionnaire said: "H3 AFTER CONSULTATION HAS TAKEN PLACE WITH THE PARISH COMMUNITY should the NDP identify sites for housing within the Parish?"</p> <p>There has been NO CONSULTATION about the results of the Options Days comments, or discussion of the way forward for different parts of the Parish (e.g. in which localities development might take place in the case of Tillington/Tillington Common).</p> <p>We have waited over a year since the Options Days for this PROMISED consultation to take place. The Parish Council has no right to identify sites in the Neighbourhood Plan until "AFTER CONSULTATION HAS TAKEN PLACE". You are ignoring the wishes of the 84% who expressed agreement by not consulting them first.</p>		
48.17	<p>Page No.: 33 Paragraph No.: 6.1.16</p> <p>In the Questionnaire, 64% of respondents said that 10% or less growth was appropriate, not 18%.</p> <p>Burghill Parish Council must support this majority by insisting on a lower housing target, and presenting a Plan to the examiner which represents the wishes of the majority of the Parish.</p> <p>Otherwise, why bother with a Questionnaire?</p> <p>Policy RA1 of the Core Strategy states explicitly that "Local evidence and environmental factors will determine the appropriate scale of development." The local evidence exists.</p> <p>18% growth would be 123 new houses. 11% would be 75 new houses. Parishioners clearly do not support having 50 more houses than needed thrust upon them, and depend upon the Parish Council/Steering Group to represent their interests and wishes.</p>	See response to 48.6 above	No change
48.18	Comments similar to 48.3	See response to 48.3	No change
48.19	Page No.: 34 Paragraph No.: 6.1.19	Whilst sites are known about, it is uncertain as whether they will come forward. In order to allocate a site, it must	No change

Ref No	Comments	PC Comments	Amendments to NDP
	<p>If sites are "already under discussion" and "planning applications have been made", then these sites cannot possibly be windfalls (the clue is in the name). The inclusion of these sites as windfalls in effect increases the number of new houses the Parish has to build, which parishioners do not want (see Questionnaire responses).</p>	<p>be suitable, achievable and deliverable., it is therefore not appropriate to allocate the sites.</p>	
48.20	<p>Page No.: 34 Paragraph No.: 6.1.21 I am aware that the Site Assessment Scoring done by the Steering Group was faulty because:</p> <ul style="list-style-type: none"> • Different numbers of Steering Group members and different members attended different assessment meetings, therefore the average from one session could not fairly be compared with the average from another session • there was no prior discussion nor agreement by the Group on how the individual assessments would be assembled therefore the rankings were naively simplistic averages. • individuals' assessments and comments were not minuted. • In addition, material planning considerations concerning the submitted sites were not adequately discussed. • The submitters of sites were not questioned about their intentions. • there is no evidence that late submission sites were assessed by the Steering Group <p>Where are the published results for all submitted sites, whether selected or rejected, with reasons?</p>	<p>The development potential of the sites has been assessed in line with present information and the normal constraints of land use planning. These constraints included: emerging planning policy; sustainability; character and appearance of any project and its impact on surroundings; access constraints; existing land uses; bio-diversity issues and protected species; land designations such as conservation areas; effect upon the living conditions of neighbours; re-use of existing buildings and the availability of sites for development. Each site was given a score of between 1 (most appropriate) and 4 (least appropriate) by members able to attend the sessions and others who provided written scores with reasons in their absence. These scores were then averaged and each site given a current rating number of between 1 and 4.</p> <p>The results will be in the submission NDP</p>	No change
48.21	<p>Page No.: 34 Paragraph No.: 6.1.23 Where are the Steering Group scores, and Options days' feedback for all submitted sites, including rejected sites</p>	<p>The submission NDP will include Appendix 7 which identifies all the scores for the sites. In addition, the Site Assessment report produced by independent consultants is available</p>	No change

Ref No	Comments	PC Comments	Amendments to NDP
	<p>and late submissions together with the assessment statements for all of them? There is a phrase in 6.1.23 "Additional information is inserted into the tables from the Options Days scores where the sum of the %'s both in favour and neutral is shown." And below the table in 6.1.30 it says "Options Days scores - High percentages denote more favourable sites." A neutral score is neither favourable nor unfavourable, and does not indicate 'more favourable". Therefore, the 'more favourable' column is meaningless. In addition, the actual numbers responding (for each site) favourably/unfavourably/neutral/AND NO RESPONSE must be published because these percentages may just be for unrepresentative numbers of people. (Maybe only a handful of people expressed a view. Without full publication of the data we just do not know:)</p>	<p>from the Parish Council and on the Burghill Parish Council website.</p>	
48.22	<p>Page No.: 35 Paragraph No.: 6.1.24 The statement that the "previously developed" site "Site 10 - Tillington Business Park - Brownfield" is brownfield is only partly true. The site proposed in the NDP is mostly on GREENFIELD land to the north of the units etc. on Tillington Business Park (which is the only part that can be described as 'brownfield'). The assertion that the whole of Site 10 as submitted in Spring 2014 is brownfield is wrong and merely an assertion. We still do not know why these 7 or 8 sites have been favoured for development over the other submitted sites. Please publish all the site assessments, including those rejected.</p>	<p>See response to 23.1</p>	<p>No change</p>
48.23	<p>Page No.: 35 Paragraph No.: 6.1.26 The questionnaire said that 13% preferred sites of 1-3 houses per site, and 40% preferred sites of 4-7 houses per site. Therefore, over half preferred sites of up to 7 houses</p>	<p>Whilst the questionnaire returns favoured sites of 4-7 dwellings (40%) more than 8-10 dwellings (33%), the Herefordshire Core Strategy proposes development at an indicative rate of 30 dwellings per hectare.</p>	<p>No change</p>

Ref No	Comments	PC Comments	Amendments to NDP
	<p>per site. Despite this, the allocated sites are between 10 and 12 houses per site, which only 33% preferred.</p> <p>In fact, the questionnaire did not ask about housing density AT ALL, so to claim "a modest housing density, in line with the aspirations of parishioners and which would also reflect the character and appearance of the parish" is not based on fact. YET AGAIN, THERE HAS BEEN NO CONSULTATION, this time about housing density.</p>	<p>A criteria was included in the policies to ensure the density of development is in keeping with the surrounding area.</p>	
48.24	<p>Page No.: 35 Paragraph No.: 6.1.27 Policy No.: n/a</p> <p>There has been no consultation about a settlement boundary for Tillington Common (or Tillington for that matter). It is not true that "the Tillington Common area has a limited identifiable core." Tillington Common was the settlement originally identified in the Rural Background Papers as a settlement. Tillington Common did have an identifiable core when it was assessed by Herefordshire Council for the Rural Background Papers. Has that identifiable core now mysteriously disappeared? South Herefordshire District Council recognised Tillington Common as an established settlement, and drew a proposed settlement boundary around its very "identifiable", NOT "limited" core (see map attached). More houses have since been built within that proposed settlement boundary so that the "identifiable core" is today even more "identifiable" in comparison with Tillington which is a sporadic collection of hamlets. Delete "inappropriate". Replace with "appropriate". Delete "limited".</p>	<p>See response to 48.3</p>	<p>No change</p>
48.25	<p>Page No.: 35 Paragraph No.: 6.1.28</p> <p>"The housing here is well spread out with significant gaps between either individual groups of dwellings or single dwellings. The Parish Council considers the Tillington Common area is a countryside location with no defined identifiers as a village in the normal sense."</p>	<p>See response to 48.3</p>	<p>No change</p>

Ref No	Comments	PC Comments	Amendments to NDP
	<p>This description defies reality. It is contrived to defend a wrong decision to put too much new housing in Tillington near Whitmore Cross, but none in Tillington Common. The "gaps" which are mentioned are within the gardens of properties, and therefore not in open countryside. And, as mentioned previously, in planning terms Tillington Common and Tillington are BOTH countryside locations because previously they have BOTH been defined under the Unitary Development Plan as under "Housing in the countryside outside settlements."</p>		
48.26	<p>Page No.: 36 Paragraph No.: 6.1.29 Both Tillington Common, and Tillington have NO mains sewage services, NO mains drainage services, and they are served by the SAME poor bus service. The Bell Inn is an isolated roadside rural pub which serves both settlements, and people from Burghill are rarely seen in it. The shop serves people from both Tillington and Tillington Common, few people from Burghill use it, and it is an accident of history that it just happens to be located near Whitmore Cross because of the premises there but it could disappear at any time whether or not more housing is built. Both Tillington and Tillington Common are 'unsustainable' location, and the Parish Council should be diligently insisting in the NDP that they both be regarded as RA3 countryside locations. However, if anything, Tillington Common is a larger and more defined settlement than Tillington, it is counter-intuitive that the Parish Council wishes to inflict excessive new housing on Tillington WITHOUT CONSULTATION but none at Tillington Common.</p>	See response to 48.3 and note 7.	No change
48.27	<p>Page No.: 36 Paragraph No.: 6.1.30 Comments as previous re preferred sites/site assessments, density and windfalls</p>	See responses to 48.21, 48.23 and 48.19 respectively	No change

Ref No	Comments	PC Comments	Amendments to NDP
48.28	<p>Page No.: 37 Paragraph No.: n/a Policy No.: B1 The density figure in (a) "not exceeding 25" is far too high but the density of new housing should as in B1 (g) reflect the scale and function of the settlement. Therefore, for (a) delete "and not exceeding 25 dwellings per hectare". . (Text removed *****)</p>	See response to 48.23	No change
48.29	<p>Page No.: 39 Paragraph No.: n/a Policy No.: B2 The paragraph (a) must be changed to read (a) The employment premises have been empty for 12 months or more and during that time actively and appropriately marketed without securing a viable alternative employment use The rest of the Policy does not make sense due to the use of the word "or" which makes (b) self-cancelling. Replace "or" with "AND" at end of (a).</p>	<p>First comment agreed Second comment not agreed. This is not consistent with the Herefordshire Core Strategy E2</p>	<p>Amend Policy B2 (a) to read: <i>"The employment premises have been empty for 12 months or more and during that time actively and appropriately marketed without securing a viable alternative employment use"</i></p>
48.30	<p>Page No.: 40 Paragraph No.: n/a Policy No.: B3 (c) is too vague. Please use the Core Strategy words from Policy RA6 Rural Economy: "(c) ensure that the development is of a scale which would be commensurate with its location and setting; (d) is too vague. Please use the Core Strategy words from Policy RA6 Rural Economy: "(d) do not cause unacceptable adverse impacts to the amenity of nearby residents by virtue of design and mass, noise and dust, lighting and smell;" (f) is too vague and not consistent with the Core Strategy. Please use the Core Strategy words from Policy RA6 Rural Economy:</p>	See response to 47.27	No change.

Ref No	Comments	PC Comments	Amendments to NDP
	<p>“(f) do not generate traffic movements that cannot safely be accommodated within the local road network” No regard has been taken of the possible impacts on water quality, which are incredibly important given the fact that the Parish is in the catchments of the Lugg and Wye, and particularly in the case of the Lugg the Parish has watercourses which are tributaries of the Lugg. Therefore, please ADD the following clause which is from Policy RA6 of the Core Strategy which addresses this: “(g) do not undermine the achievement of water quality targets in accordance with Core Strategy Policies S03 and S04.” (g) existing therefore becomes (h)</p>		
48.31	<p>Page No.: 40 Paragraph No.: n/a Policy No.: B4 (b) is too vague “(b) The proposed use will not cause unacceptable disturbance to neighbours;” Please replace with the words from Core Strategy RA6: “(b) (The proposed use will not) cause unacceptable adverse impacts to the amenity of nearby residents by virtue of design and mass, noise and dust, lighting and smell;”</p>	<p>The wording in the NDP reflects aim of the wording in Policy RA6 and should remain.</p>	<p>No change.</p>
48.32	<p>Page No.: 44 Paragraph No.: 6.4.5 The answer to the statement “The result here may be confused by respondents not understanding the difference between public footpaths and roadside footways.” is DO NOT CONFUSE PEOPLE. Use Plain English. Throughout the NDP delete ‘footway’ and insert ‘pavement’ which everybody understands.</p>	<p>See response to 48.4</p>	<p>No change</p>
48.33	<p>PageNo.: 44 Policy No.: B7 This is supposed to be OUR NDP for a countryside location. This is not a city; we do not have “Zones”. Throughout the NDP, delete “zone” and replace with “area” or “group”. USE PLAIN ENGLISH.: Community Infrastructure Levy is for Capital Projects. Unfortunately, it cannot be used as in</p>	<p>Comments noted and agreed</p> <p>Whilst C.I.L cannot be used for revenue projects, other funding/developer contribution may be used for this.</p>	<p>Amend Policy B7 to replace “zones” with “areas”.</p>

Ref No	Comments	PC Comments	Amendments to NDP
	<p>(c) "To Increase public and community transport, within, to and from the villages" unless the Parish Council is seriously considering purchasing a fleet of buses with it. This needs rewriting in consultation with groups of interested parishioners who actually use these services. In addition, it is naive to have a policy for public transport when the Parish Council has no control over the provision of public transport.</p>		
48.34	<p>Page No.: 47 & 48 Policy No.: B8 (e) "It does not result in backland development. " This - "backland development" - is planning speak. The meaning is unclear to we ordinary inferior people. Plain English please. (e) "It does not result in backland development which has a detrimental impact on the character of the village". Delete "village", insert "Parish" Has Burghill Parish council forgotten that this is supposed to be a Plan for the whole Parish and not just for Burghill village? "(h) Good relationship to the street and incorporates an active frontage" We are in the countryside; we do not have streets. Delete "to the street". Replace with "to its surroundings". This - "active frontage" - is yet more planning speak inappropriate to this rural area.</p>	<p>Comments noted. Glossary to be included</p> <p>Agreed</p> <p>Amend to read "to its surroundings"</p>	<p>Glossary to be included.</p> <p>Amend B8(e) to delete "village" and replace with "parish".</p> <p>Amend B8(h) to delete "to the street" and replace with "to its surroundings"</p>
48.35	<p>Page No.: 50 Paragraph No.: 6.6.2 "Burghill has a network of footpaths and open spaces, which link facilities around the village, provide means to reach open countryside and longer distance footpaths." That is very nice for Burghill. Tillington, on which you seek to foist disproportionate development, does not have these things and therefore taking these into account, is not a location for sustainable development.</p>	<p>Amend paragraph to read Burghill Parish</p>	<p>Amend Paragraph 6.6.2 to read "Burghill Parish has...."</p>

Ref No	Comments	PC Comments	Amendments to NDP
48.36	<p>Page No.: 50 Paragraph No.: 6.6.3 Policy No.: n/a</p> <p>"Burghill also has a range of community facilities that are widely used by the community, such as the school, village shop, Simpson Hall, golf club, the public house, church, "Pick your Own", Court Farm Leisure, Copse Leisure area and cricket club."</p> <p>After Burghill INSERT the word Parish</p>	Amend paragraph to read Burghill Parish	Amend Paragraph 6.6.3 to read "Burghill Parish has...."
48.37	<p>Page No.: 51 Paragraph No.: 6.6.11</p> <p>This section is ambiguous. Para 6.6.9 defines "pubs and local shops" as social and community facilities. Para 6.6.11 discusses the possible unviability of local facilities. To be consistent with a clarified Policy B2 (fully reflecting Core Strategy policy E2) as discussed above, it should be time bound (vacant for 12 months or more, or whatever the community right to buy specifies) and the wording "appropriately marketed" ought to be included for the same reasons as I have discussed concerning Policy B2: i.e. "and where appropriate, it has been vacant for 12 months or more and appropriately marketed for community use without success."</p>	Amend as requested	Paragraph amended to insert the work "appropriately" .
48.38	<p>Page No.: 53 Paragraph No.: 6.6.15 Policy No.: B11</p> <p>This Policy is confusing. Please rewrite/clarify. It discusses "re-use" then "change of use" and "other uses" so it is unclear whether, for example, it is enabling the village hall to be changed into a residential house or not.</p>	Not agreed. Policy is clear that any change of use should satisfy the criteria within the policy.	No change
48.39	<p>Page No.: 58 Policy No.: B14</p> <p>The Policy includes a proposed Solar Farm Site at Winslow on Map 7.</p> <p>This really is a most inappropriate site because</p> <ul style="list-style-type: none"> • it is on top of a hill and visible for miles so it is not in conformity with criteria (c); 	<p>The proposed site was put forward during the consultation process.</p> <p>The details will be assessed should an application for planning permission be submitted</p>	No change

Ref No	Comments	PC Comments	Amendments to NDP
	<ul style="list-style-type: none"> • it is a scar on the landscape and affects the setting of the church and Conservation Area being visible from them, and also from near Concertina Cottage, so is not in conformity with criteria (d); • it would adversely affect the visual amenity of users of the Three Rivers Ride bridleway and the various footpaths to the south 		
48.40	Page No.: 59 Paragraph No.: 7.2 Policy No (Text removed *****)	No comments	Section will be amended to reflect current position
48.41	<p>Page No.: 60 Paragraph No.: 8.2 Policy No.: n/a</p> <p>After "Where the need for change is identified the Parish Council will work with ". INSERT "Parishioners and ""</p> <p>There has been an amazing lack of consultation with the community, and lack of engagement with the community in the development of the Draft Plan.</p> <p>So that the full sentence reads:</p> <p>"Where the need for change is identified the Parish Council will work with Parishioners and Herefordshire Council to produce updates and amendments where necessary. The Parish Council has no right unilaterally to amend the Plan, any "updates and amendments" should be consulted on.</p>	<p>When the Burghill NDP reaches the end of the process it will become part of the development plan for the area for the plan period until 2031.</p> <p>When the Core Strategy is reviewed it is expected that the Burghill NDP will form part of that process.</p>	No change
48.42	<p>Page No.: 68 & 69 Paragraph No.: n/a Policy No.: n/a</p> <p>The submitted sites map on these pages do not include the Tillington Fruit Farm sites along Crowmore Lane.</p> <p>The Minutes of the Burghill Parish Council Meeting 13 January state: "The site had been considered during the drafting of the Neighbourhood Development Plan ... "</p> <p>If it had been considered it must have been submitted, so it should be on a map. I was at the Parish Council Meeting where the agent for Farmcare stated that that there will be</p>	The sites at Tillington Fruit Farm are in open countryside and housing provision granted at those sites is "windfall" development.	No change

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	<p>7 or so conversions of Agricultural buildings to residential under Permitted Development Orders. THESE MUST ALL BE INCLUDED IN THE PLAN AS ALLOCATED CONVERSIONS. The consequence will of course be to reduce the number of new builds needed, which supports the wishes of the community for 10% or less growth as expressed in the Questionnaire.</p>		
48.43	<p>Appendix 3 Design Guidance (</p> <p>1. "Location"</p> <p>a. I am very concerned about the two "should not materially harm" statements. One person's interpretation of "materially harm" is another person's "does not materially harm". There is the terrifying prospect of the Parish Council assessing Planning applications with their so-called 'expert' on hand, giving advice on decisions and becoming a de facto judge and jury on what is recommended, and for whom. Such recommendations then carry weight under the Neighbourhood Planning regime, and Herefordshire Council Officers will be encouraged to rubber-stamp them. The Parish Council itself needs to find a way of deciding these matters for itself, and not be so over-reliant on others.</p> <p>b. The second one, "should not. ...Materially harm the character or appearance of its surroundings" should include the following additional words "nor be over prominent on the landscape, for example by virtue of its height or elevation"</p> <p>2. "Infrastructure"</p> <p>There is something important completely omitted here. Surface Flooding is a known issue in this general area, with its heavy clay soils, the poor infiltration characteristics</p>	<p>No comment</p> <p>Herefordshire Council will remain the Local Planning Authority and will determine planning applications in accordance with the Core Strategy and the Burghill NDP when it is part of the Development Plan for the area.</p> <p>The Parish Council consider that this would make the guidance too specific.</p> <p>The Parish Council consider that this would make the guidance too specific.</p>	No change.

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	<p>of these soils, and high water tables. As is well known, there are many rural sites which come forward in areas where there are neither mains sewers nor mains drainage. The impact of waste water and drainage has not been addressed for these.</p> <p>(Text removed *****), the following needs to be inserted:</p> <p>"For developments in areas which do not have mains sewage or mains drainage, waste water discharges should be to a package sewage treatment works in the first instance, alternatively (and only where appropriate) to a septic tank, in both cases discharging to soakaway (not to a watercourse, due to the need to recover or maintain good river water quality). Phosphates strippers must be fitted to all new package sewage treatment works/septic tank installations (again due to the need to recover or maintain good river water quality). Planning applications must provide independent evidence that water discharges will not cause additional surface water flooding which affects the amenity of other properties or prevents the proper function of their septic tanks; nor cause additional surface flooding on nearby highways.</p> <p>Developers may be required to contribute to works which prevent additional surface flooding, and in some cases where existing flooding is unacceptable, to remediate that too before their development can be allowed to proceed."</p> <p>3"Transport" This should be changed to "ALL of the dwellings on a development site shall be provided with lockable garages within the curtilage of the dwelling."</p> <p>4. "Layout and Size of Development"</p>	<p>The Parish Council consider that this would make the guidance too specific.</p> <p>The density figure is included as a maximum. It is clear from Ordnance Survey maps that densities in the two</p>	

Ref No	Comments	PC Comments	Amendments to NDP
	<p>a. "Housing density shall be no more than 25 dwellings per hectare including all works required for access, public utilities, infrastructure and vehicle parking" That is ridiculous. This does not align with NDP Policy B1 (g). This is a rural area, not an urban one. Delete the reference to 25 dwellings per Hectare. Substitute as per B1 (g) "reflect the scale and function of the settlement" and then: "New Housing density shall be no more than 14 dwellings per hectare in Burghill; 9 dwellings per hectare in Tillington and Tillington Common; and 22 dwellings per hectare in Lower Burlton including all works required for access, public utilities, infrastructure and vehicle parking"</p> <p>b. "Housing groups within development projects shall not exceed 10 dwellings." This is WRONG. Replace with the following, to align with the Questionnaire responses: "Housing groups within development projects shall not exceed 7 dwellings." 5. "Size of Dwelling" ~ "New dwellings should have a minimum internal floor area of 80 sq. m where possible. ~ Development sites shall comprise not more than 10% of 5 bedroom dwellings, not more than 60% of 3 or 4 bedroom dwellings and the remainder shall be 2 or 1 bedroom dwellings ~ At least 15% of dwellings should be single storey ground floor buildings" These criteria are just arbitrary. They may have been taken from the questionnaire, but it is naive to rely on that for this sort of information, because someone might have spent 20 minutes on the questionnaire then perhaps 5</p>	<p>settlements (Burghill and Tillington) fall far short of 25 dwellings per hectare, and future development in context with the surrounding area should reflect this.</p> <p>Too prescriptive contrary to National Policy</p> <p>Whilst the questionnaire returns favoured sites of 4-7 dwellings (40%) more than 8-10 dwellings (33%), the Herefordshire Core Strategy proposes development at an indicative rate of 30 dwellings per hectare. This would have resulted in 33 dwellings on Site 10, and 17 on Site 25.</p> <p>The Parish Council consider the inclusion of a minimum floor space for dwellings a necessity to ensure the dwellings that are constructed in the Parish are fit for purpose.</p> <p>The further criteria are included to guide the size of dwelling to that which is appropriate to the Parish.</p>	

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	<p>seconds on this, and then it becomes "Design Guidance" if this is carried through like this.</p> <p>For dwelling sizes etc., There should have been full and proper consultation in the form of workshops to engage the community to establish what people really want, not the imposition of statements like this which have not been thought-through, have been inadequately consulted-on, and which will plague us forever.</p> <p>6. "Site Specific Features"</p> <p>"Permitted development rights for outbuildings, extensions, additions and conservatories shall be withdrawn on sites for new housing"</p> <p>THIS IS TOO RESTRICTIVE. You seem to be seriously suggesting that people should not be able to put up a shed in the garden or erect a conservatory. How would you feel if you could not erect a shed in your own garden? Do you want people to store their tools and implements under bright blue tarpaulins or in bin bags in their gardens?</p>		
48.44	<p>Map 4 Tillington proposed settlement boundary including Tillington Business Park This is disgraceful.</p> <p>1. The parish council has not properly pursued the exclusion of Tillington from the Herefordshire council village lists, it has been negligent by failing to do this</p> <p>2. There has been no consultation on a settlement boundary for Tillington, someone has just drawn one to include their preference for development.</p> <p>3. The Tillington Business Park has received undue prominence in This plan because someone has an agenda to develop the Greenfield land north of it come what may</p> <p>4. The Tillington Business Park site was submitted including all the land north of it as 4 acres, following which that site including all the land north of it has been wrongly declared to be all brownfield, when only the most southern part might conceivably be so described</p>	<p>See 48.3</p> <p>See 48.7</p> <p>See 23.1</p> <p>See 23.1</p>	

Ref No	Comments	PC Comments	Amendments to NDP
	<p>5. There has been no consultation on housing densities, nor housing numbers per site, nor the allocations</p> <p>6. There has been no consideration of lack of infrastructure.</p> <p>7. There has been a clinical, callous disregard for the rural nature of Tillington in this plan. (Text removed *****)</p>	<p>See 48.23</p> <p>See note 7</p> <p>See 48.23</p>	
48.45	<p>Map 6 Designated local green spaces page 66</p> <p>The Planning Practice Guidance for the National Planning Policy Framework (NPPF) is clear - Local Green Space designation should not be used in a way that undermines the identification of development land in suitable locations. In the draft Neighbourhood Plan, Policy B10 "protects" local Green Spaces. This includes "4. The green areas at Leasown and Bakers Furlong" and Map 6 on page 66 identifies this proposed green space.</p> <p>Note that at the northern tip of that supposed green space, there is a projection across the eastern end of the road Bakers Furlong where currently it terminates in a cul-de sac.</p> <p>I OBJECT to this projection because it blocks access to the Site 35 submitted by Farmcare as a possible site for housing (which is just to the east of Bakers Furlong and which would otherwise be able to use this as an access). Site 35 is an eminently sustainable development site adjacent to the main settlement of Burghill village.</p>	See 47.26	
48.46	<p>Page No.: 34 Paragraph No.: 6.1.23</p> <p>1. "The sites have been independently assessed by Kirkwells"</p> <p>I am not convinced of this. In order to do the job at all, they must have been briefed, they must have been given information about settlement boundaries (both existing, altered, and not yet existing) and they must have been shown where sites are. All of this information and more</p>	<p>The sites were independently assessed by Kirkwells, who visited the site and scored the sites consistently against a set of criteria.</p> <p>The most favourable sites were brought forward into the Burghill NDP.</p>	No change

Ref No	Comments	PC Comments	Amendments to NDP
	<p>given to them by we know not who has informed their assessments.</p> <p>2. "The report is technical, based on professional planning opinion" (Background, page 2, paragraph 1.3 of the Kirkwells Site Assessment Report)</p> <p>a. There are mistakes in the Report about access to sites, bus services, size of site, and number of houses proposed. This means:</p> <ul style="list-style-type: none"> • Some sites have been scored wrongly, either because they are considered as not having access when they do, or having access when they have none. • Some sites have been scored wrongly (Portway and Tillington Common), because they have been scored as "no bus route" when there is one (or several routes) • Some sites have been discounted as being "isolated dwelling in the countryside" when in fact more than one house or conversion was submitted, and not in an isolated situation. • Some sites have been described as having capacity for hundreds of houses, when that was not what was submitted. For example, Farmcare/Wellcome Trust said at a well-attended Parish Council Meeting that they would do whatever the Parish wanted. The Chief Executive of Farmcare said in a letter dated 28 November 2014 to my husband (which he copied to the Parish Council Chairman) that Farmcare wished to engage with the community in supporting and producing the neighbourhood plan in consultation with the community, and acknowledge the feelings and response from the community. The Duchy of Cornwall also have said they would do whatever the Parish considers to be beneficial to it. If you put in a column, as Kirkwells have, that a site has a capacity for 96 or 123 houses, that will terrify us all, and is not what was intended by the site submitter. This is misleading. 		

Ref No	Comments	PC Comments	Amendments to NDP
	<p>Why did Kirkwells (or indeed the Steering Group in the first instance) not talk with site submitters about their intentions in order to make better-informed site assessments?</p> <p>The important 'Concept' consideration in Herefordshire Council's Guidance Note 21 ("Concept - is the basic idea of how the site may be developed appropriate or is there a better way of doing it?") has therefore been completely ignored, and suitable sites excluded unnecessarily.</p>		
48.47	<p>Page No.: 36 Paragraph No.: 6.1.30</p> <p>COLUMN HEADED "CONSULTANTS' RATING FIGURE"</p> <p>1. Secretiveness and Opacity</p> <ul style="list-style-type: none"> • The consultants' Report was dated September 2015. It is quite wrong that the assessments within it, including assessments of sites not listed in the 6.1.30 Table as "preferred" sites, have not been available to parishioners until 4 weeks into the 6-week Regulation 14 consultation, because they are essential to inform the reader's understanding of the draft Plan. - • The Report has only been published due to requests from Savills and Herefordshire Council, not due to the need for parishioners to be informed. The Parish Council obviously does not consider that Parishioners should be informed or included. • Parishioners have not been notified of the publication of this Report. It has to be searched for, and found, in a section of the Burghill Parish Council's website which is not obvious. Most parishioners will not be aware that the Report exists. • Parishioners' views are supposed to have been "taken into account in preparing the Plan" (page 2 of the draft Neighbourhood Development Plan) and their comments are supposed to have been "considered". The making of a Neighbourhood Development Plan should be an "inclusive" 	See comments on 47.1 about consultation	

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	<p>and "open" process and the community "fully informed" and "actively involved" (see paragraph 047 of the National Planning Practice Guidance). Our Plan has been produced mainly in secret, and if this Report from Kirkwells has been withheld until the forced publication on February 1th 2016, one wonders how much more has been done 'on the quiet'.</p> <p>2. Kirkwells Allocation of Points</p> <ul style="list-style-type: none"> • Points have been allocated according to whether the site is within or adjacent to a settlement boundary. In the case of Sites 10,22, and 25 the sites have been allocated points by Kirkwells as if there were an existing settlement boundary, even though the settlement boundary is "proposed" and parishioners HAVE NOT BEEN CONSULTED ABOUT IT (not even those resident in Tillington). Consequently, many offered-up sites were not assessed AT ALL because they were considered to be outside what is, in reality, a non-existent settlement boundary which someone has just imposed. ~ The consultants have allocated points dependent on access. Site 10 has no access itself. The only possible access is through the "Business Park" which is locked and barred by a gate between early evening and early morning. • The consultants have allocated points according to whether a site is greenfield or brownfield. Site 10 is greenfield. Surely no-one is suggesting building houses on the brownfield 'Business Park' (yet?) as that would involve loss of rural employment and not be in accord with Policy B2? • The consultants have allocated points according to "constraints". Now that we unimportant, irrelevant, and uninvolved parishioners have at last been allowed a glimpse of the consultants' Report we can see that "constraints" are not described or explained, so what are 	<p>The Site Assessments undertaken by Kirkwells were in accordance with a specific set of criteria and draft settlement boundaries for Burghill and Tillington as they are both included in the Core Strategy as settlements to be the main focus of housing. The Lower Burlton area was included as it is adjacent to the city boundary.</p> <p>Site 10 as submitted included the Business Park and as such had an existing access, and is also classified as part brownfield part greenfield.</p>	

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	<p>they? They should be specifically listed for each site. Also, it seems the same "constraints" may have been counted twice, as there are two columns, one marked "constraints" and one marked "suitability/constraints".</p> <ul style="list-style-type: none"> • As the "Consultants' Rating Figure" for these supposed preferred sites are so questionable, what about the rest of the sites, which are not included here? If the points for those other sites were properly readjusted, some of them might prove to be preferred sites instead. More thoughtful and informed assessments might provide different results. • The consultants do not consider at all access to drainage or sewers in their points system. This is a serious omission contrary to the Herefordshire Council Guidance Note 21. These assessments have NOT therefore been done in line with Guidance Note 21 as FALSELY CLAIMED in paragraph 6.1.23 of the draft Neighbourhood Development Plan. (Text removed *****) 	<p>Sites that are in open countryside are not scored beyond being noted as such. This is in accordance with the guidance produced by Herefordshire Council</p> <p>Infrastructure will be provided by developers for future development.</p>	
49.1	Text as 48.1	Response as 48.1	No change
49.2	<p>Page 2 Para 2</p> <p>Contrary to what is stated, the draft development plan has NOT been prepared in accordance with The Localism Act of 2011 NOR in accordance with Regulation 14 of Statutory Instrument No. 637 TOWN AND COUNTRY PLANNING, ENGLAND The Neighbourhood Planning (General) Regulations 2012.</p> <p>In addition, the Regulation 14 consultation DISCRIMINATES AGAINST THOSE WHO WORK (this Draft Plan is only available in hard copies for them on Saturdays, and few would be able to view it up to 16.00 on weekdays) and discriminates IN FAVOUR OF THOSE WHO DO NOT WORK who would be able to view it not just on Saturdays but also Monday to Fridays).</p> <p>Furthermore, if the latest (2011) Census data had been checked, this discrimination could have been foreseen</p>	<p>The Burghill NDP was available on the Parish Council website for the Regulation 14 consultation period. In addition to this there were hard copies available at specific locations which were open to the public during this period.</p> <p>See also response at 48.1</p>	No change

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	(and/or avoided) because in the Output Areas most closely aligned with Burghill village, only 36% of 16-74 year olds work in full-time or self-employment; whereas outside Burghill village 56% of 16-74 year olds work in full-time or self-employment. Therefore, not only have people who work been discriminated against, the discrimination is more against those from outside Burghill village. This encourages a skewed response to the Regulation 14 consultation, in favour of residents from Burghill, and AGAINST RESIDENTS FROM OUTSIDE BURGHILL.		
49.3	Page 2 Para 3. (Text removed *****)	Response as 48.1	No change
49.4	Page 2 Para 5 This states "Comments forms are available on the Burghill Parish websites". (Text removed *****) Comments as per 47.2	Response as 47.2	
49.5	Page 5 Para 1.3 The questionnaire was only distributed to the ca 680 properties in the Parish, plus approx. 40 "businesses". It was not distributed to the ca 1,600 individuals in the Parish nor the approx. 1,200 electorate so it is incorrect to say that its "aim was to reach right across Individuals", and therefore the claimed "picture (and evidence base) of the issues and concerns that should be addressed" is incomplete.	The Parish Council have carried out consultation from September 2013 to present. An awareness raising meeting was held in March 2014 which was publicised around the Parish. 720 questionnaires were distributed throughout the Parish with a response rate of 63%.	No change
49.6	Page 6 Para 1.9 (Text removed *****) The Habitats Regulations Assessment and Strategic Environmental Assessment have been completed by Herefordshire Council for release with this Regulation 14 Draft Plan.	The Draft Habitats Regulations Assessment and the Draft Environmental report were completed for the Regulation 14. However, the final Environmental Report and HRA will be completed for submission.	No change

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49.7	<p>Page 8 Para 2.5</p> <p>As a matter of fact and degree, the statement "The village of Burghill is the main component of the developed area for housing within the parish" is correct. Why then, if it is the primary settlement, has it received so little housing allocated to it in this Draft Plan? It has been allocated 24 (Pyefinch as a result of planning permission granted) plus 12 (site east of Redstone) which is a total of 36 on existing dwelling numbers of about 255, so just 14% growth. On the other hand, Tillington has had a settlement boundary drawn round it by someone (without proper consultation or community engagement) where there is proposed to be 24 new dwellings on existing dwelling numbers of 18 within that proposed settlement boundary, so 133% growth. This is totally disproportionate and unfair.</p> <p>The Parish Church of St Mary's is not just "a fine example of well-maintained traditional stone built church architecture standing in an elevated position in the southern portion of the main group and a splendid centre piece of the Conservation Area", it is a rare Grade II* Listed Building and its setting and that of the Conservation Area must be protected.</p>	<p>As 47.1</p> <p>This is a statement of the existing character of the Parish.</p> <p>See comment to 44 above</p>	No change
49.8	Page 10 Para 2.12 Text similar to 48.2	See response to 48.2	No change
49.9	Page 10 Para 2.13 Text same as 48.3	See response to 48.3	No change
49.10	<p>Page 13 Para 2.21</p> <p>The statement concerning Tillington Business Park "To the rear of the buildings there is land which is used in conjunction with the business zone for open commercial storage." is untrue, it cannot be true.</p> <p>This site is described as "Site 10 - Tillington Business Park — Brownfield" in paragraph</p> <p>But here, below, are 3 images from historical aerial photography courtesy of Google Earth, taken in 1999, 2006, and 2009. The proposed Site 10 is superimposed on</p>	See response to 47.6	No change

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	<p>each (outlined in red). It is obvious that from north of the point marked "X" on those images, that THE LAND IS NOT BROWNFIELD, IT IS GREENFIELD.</p> <p>In addition, the Planning Permission for the dwelling to the west of the commercial premises is for residential use, (with condition for limiting occupation only to persons employed in the associated commercial premises, or in the management of those premises, or their dependants).</p>		

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

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

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

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

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

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	<p>of 20 for windfalls over the plan period" is also 16% (20 + 123), obviously picked apparently to aligned with the Core Strategy.</p> <p>But the calculation for the Burghill Neighbourhood Development Plan has been wrongly made, and consequently (ignoring the fact that the Core Strategy assumption is dubious because it under-provides for windfalls anyway) there is an underprovision for windfalls in the Burghill Neighbourhood Development Plan.</p> <p>Refer to my comments related to para 6.1.19 on page 34 where I will explain this.</p>		
49.25	<p>Page 33 Para 6.1.16</p> <p>To the best of my knowledge, Herefordshire Council has never said that it has specifically rejected Burghill Parish Council's submission concerning 11% growth instead of 18%.</p> <p>Several pages of text extending this point in relation to Core Strategy Examination</p>	<p>The Herefordshire Core Strategy is now the adopted policy for the County. Whilst the 18% growth is an indicative figure across the Hereford HMA, a lower figure is only likely to be acceptable where there are significant constraints within a particular settlement and this can be evidenced.</p> <p>There are no specific issues identifiable with Burghill or Tillington</p>	No change
49.26	<p>Page 33 Para 6.1.17</p> <p>The statement "Figure 4.14 of the Core Strategy continues to identify both Burghill and Tillington as growth areas. The PC has previously agreed that growth should be confined to Tillington and not Tillington Common which is perceived to be an unsustainable countryside location for new development, as confirmed by previous planning decisions." Is misleading and is unfair to the residents of Tillington because:</p> <p>1. it was Tillington Common which was appraised as a settlement in the 2009/10 and the 2013 Rural Background Papers, not Tillington, and then Herefordshire Council just removed the word Common, which is why "Tillington" is in the Figure 4.14 list (previously titled 4.20), not because it has been justified to be in there,</p>	See response to 48.18 and 47.17	No change

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	<p>2. Indeed, in an email to me dated September 18 2014, the Chairman of the Steering Group said (and I have highlighted the relevant parts): 'As I said at the meeting, our claim against the soundness of the Draft Core Strategy is that Burghill, settlement within our NDP zone. The remainder of the- NDP zone is therefore countryside.'</p> <p>3. the Parish Council put forward a representation in June 2014 (mostly mine) cogently arguing that both Tillington and Tillington Common should be removed from the 'main growth' list, but then did not pursue it at the time of the Main Modifications.</p> <p>4. In February 2015 the Parish Council put forward a 'Statement of Common Ground' to Herefordshire Council (not having consulted with residents of Tillington or Tillington Common) saying that: "If the Inspector is not minded to accept the representations made by Burghill PC on this matter then the name "Tillington" should be defined by the addition of the words in brackets of: (Not Tillington Common). The reason for this is that HC planning application decisions and Inspector decisions have always considered Tillington Common to be a countryside location.'</p> <p>Several pages of text re-iterating these points</p>		
49.27	<p>Page 34 Para 6.1.19 The definition of Windfalls according to the Core Strategy (and National Planning Policy Framework) Glossary is: 'Sites which have not been specifically identified as available in the Local Plan process' However, this Draft Plan has counted sites which were submitted to the Neighbourhood Plan process, but not allocated in this Draft Plan, as "windfalls". This is WRONG, because they are known about, owners have declared that they are available, so they are NOT windfalls.</p>	See response to 48.19 and 47.18	No change

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	<p>There were 10 dwellings included in an earlier leaked Draft of the Neighbourhood Plan which were conversions of buildings in the countryside. In any case they would be subject to the Town and Country Planning (General Permitted Development) (England) Order 2015, and therefore would just be subject to Prior Approval. These should be included in the Draft Plan as allocated dwellings, not as windfalls. They are KNOWN ABOUT. In the case of the buildings at Hospital Farm, there were up to 6 possible dwellings there on a site submitted to the Neighbourhood Plan by Herefordshire Council and in the "Revised Smallholdings Policy 2015 - Updated January 2016" it is stated "As part of the disposal process, the council will consider potential redevelopment of surplus farm houses and farm buildings</p> <p>This immediately reduces the numbers of new builds needed by 10. But there are others which could be included as well - see my comments under para 6.1.30. Paragraph 4.8*9 of the Core Strategy states: "Historically it is evident that much rural housing has come forward on small sites, often for individual dwellings, being allowed through the application of planning policy rather than the allocation of housing sites. Additionally, significant numbers of new housing continues to be delivered through the conversion of rural buildings, many being redundant agricultural buildings on farmsteads. Paragraph 48 of NPPF indicates that an allowance may be made for windfall if there is compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source.'</p> <p>As mentioned earlier, there were deep concerns by other Parish Councils that Herefordshire Council had under-provided for windfall development at the Core Strategy strategic level. The consequence is of course that there will be an excessive number of new builds in the</p>		

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

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	<p>demonstrated in the previous paragraph that it should, or could, be over 90!</p> <p>The plan must reconsider the included element for windfalls and make the number realistic. At the same time, there are 10 dwellings which should be removed from the existing windfall deduction, and netted off as proper allocations. Burghill Parish does not need to have the excessive numbers of new housing which this Draft Plan provides for, because if we do, then the Parish will vastly overshoot its targets.</p>		
49.28	Page 34 Para 6.1.21 Text as 48.20	See response to 48.20	No change
49.29	Page 34 Para 6.1.23 Text as 48.21	See response to 48.21	No change
49.30	Page 35 Para 6.1.25 See 47.2	See response to 30,44, 47.6 and 47.20	No change
49.31	Page 35 Para 6.1.26 Text as 48.23	See response to 15.2, 28, 47.21 and 48.23	No change
49.32	Page 35 Para 6.1.27 Text similar to 47.22	See response to 47.22	No change
49.33	<p>Page 35 Para 6.1.28</p> <p>This is a description which equally fits Tillington between Crowmore Lane and the Cricket Club. However, in the case of Tillington Common it is untrue. The "gaps" which are mentioned are within the curtilages of the clusters of properties mentioned in my comments concerning the erroneous Paragraph 6.1.27, particularly the 41 dwellings. As for it being "a countryside location with no defined identifiers as a village in the normal sense" that is nonsense. That is written because someone does not want it to be considered for development. Tillington Common is a nucleated settlement which is centred around the old Stonehouse Farm Heath Farm near the Badnage Lane/C1095 Tillington Road Junction (near the post box and bus turning point), and which developed mainly south eastwards towards the old Rose Farm both along the north and south side of Tillington Road and parallel to that on the parallel track to the north. Of anywhere in Tillington, the settlement of Tillington Common is more definable as a</p>	See response to 47.23 and 48.3	No change

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

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

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

Ref No	Comments	PC Comments	Amendments to NDP
	<p>The existing traveller's site to the west of Manor Fields was a Change of Use from Agricultural to a 2 family Gypsy site permitted in 2006. The permission was for the benefit of named individuals taking into account special circumstances and it specifically stated that on cessation of their occupation the land shall revert to agricultural use." The statement supporting the retention of the existing traveller's site by Burghill Parish Council should be qualified with these words: "... recognising that on cessation of the occupation by the named individuals in the Planning Permission the land shall revert to agricultural use as per the original condition of the Planning Permission.'</p> <p>Again, you are being overtaken by events. Planning Application P 151110/F for 4 gypsies and travellers' caravans on the former Three Shires Nurseries is being considered by the Planning Committee on 16 March 2016. The Officer's Report to Planning Committee recommends that planning permission be granted.</p> <p>It is hard to see that there will be reasons for the Planning Committee to turn it down. It would be prudent to be ready to include these 4 gypsies and travellers pitches in the NP should this be approved by the Committee.</p> <p>And if you revisit the Draft Plan to include these traveller sites, there is no good reason why you should not revisit it to reassign housing allocated sites on the basis I have suggested in my comments on Para 6.1.30.</p>	travellers sites within the Strategic Policies of the Herefordshire Core Strategy	
49.38	Page 39 Policy B2 Text similar to 48.29	See response to 48.29	No change
49.39	Page 40 Policy B3 Text Similar to 47.27 and 48.30	See response to 47.27 and 48.30	
49.40	Page 40 Policy B4 Text same as 48.31	See response to 7.27 and 48.31	
49.41	Page 44 Para 6.4.5	See response to 48.32	No change

Ref No	Comments	PC Comments	Amendments to NDP
	Text similar to 48.32		
49.42	Page 44 Policy B7 Part of text included in 48.33	See response to 48.33	No change
49.43	Page 47&48 Policy B8 Text similar to 48.34	See response to 48.34	No change
49.44	Page 48 Para 6.5.9 "The Parish Council and the residents of the Parish consider it important to protect the character and setting of Burghill, the other housing groups within the parish and the surrounding landscape. " (Text removed *****) This is Burghill-centric. Both Tillington and Lower Burlton are having housing foisted on them by people who do not wish Burghill to bear its proportionate share of development. For the purpose of dumping housing on them, Tillington is a "settlement", and I do not know what Lower Burlton is. But for the purpose of landscape character, they are mere "housing groups" (Text removed *****)	The sentence was written bearing in mind that Burghill is the larger settlement with other housing groups within the Parish.	No change
49.45	Page 49 Policy B9 Here we go again. "(b) Development proposals should seek to preserve and where possible enhance the character of the village" The village. Singular. This was written for Burghill village.	See response to 47.28	
49.46	Page 50 Para 6.6.2 Text same as 48.35	See response to 48.35	
49.47	Page 50 Para 6.6.3 Text same as 48.36	See response to 48.36	
49.48	Page 51 Para 6.6.11 Text same as 48.37 (Further Text removed *****)	See response to 48.37	
49.49	Page 53 Para 6.6.15 Text same as 48.38	See response to 48.38	

Ref No	Comments	PC Comments	Amendments to NDP
49.50	<p>Page 58 Policy B14 The Policy includes a proposed Solar Farm Site at Winslow on Map 7. Then there are proposed Policy criteria. The Policy criteria are broadly satisfactory. But they do not fully reflect or align with Core Strategy Policies, which contains the overarching policies for Herefordshire. In particular criteria (d) has obviously deliberately been written in a narrow way to ensure that the site at Winslow would be permitted. As written, it states: "(d) there is no detrimental impact on any neighbouring land uses, including Listed Building or Conservation Area; "land uses" is deliberately too narrow. For example, someone wishing to ensure that a solar farm on this proposed site would gain permission — for example, someone who desired a change of use on it for ulterior motives — could argue that the Listed Building and Conservation Area would not be not "neighbouring" the proposed solar site, although it would in fact detrimentally affect their setting. Therefore, the following needs to be done: Clause (d) should be struck out and the following clauses substituted for it, and the word 'neighbouring" should not be included: "the proposal does not adversely affect residential amenity" [consistent with CS Policy SD2 Renewable and low carbon energy generation] "the proposal does not adversely impact upon international or national designated natural and heritage assets, whether formally designated or not, including Listed Buildings or Conservation Areas and their settings, [consistent with CS Policy SD2 Renewable and low carbon energy generation and CS Policy LD4 Historic environment and heritage assets and CS Policy E4 Tourism]</p>	<p>The Parish Council consider that the proposed policy aligns with the relevant policies of the Herefordshire Core Strategy.</p>	<p>No change.</p>

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

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

Ref No	Comments	PC Comments	Amendments to NDP
49.56	<p>Page 34 Para 6.1.23 This is a second further objection following the accidental discovery of a "Site Assessment Report" buried on the Burghill Parish Council website which was only put onto that website on 17 February 2016, FOUR WEEKS AFTER this Regulation consultation was supposed to have started. Para 6.1.23 claims that "sites have been independently assessed by Kirkwells in line with Guidance Note 21 issued by Herefordshire Council." This is not wholly true. That Guidance, suggests that:</p> <p>a. the site selection process should be carried out in an open and transparent way, including consultation with the community and the production of a full evidence base to support and justify the conclusions reached. But in contrast, the process has not been open and transparent; the community consultation has been virtually non-existent; the 'full evidence base' has not been published; and the belatedly-published Site Assessment Report is the nearest it gets to 'evidence', and it is certainly not 'full'.</p> <p>b. Connection and availability of utilities such as water supply and drainage are supposed to be important considerations. But in contrast, drainage and sewage have not been considered in the Report nor in the Draft Plan. For a place like Tillington which is without mains drainage and sewage, compared with Burghill which is connected, this is a dreadful omission.</p> <p>the concept of a possible site should be assessed the basic idea of how the site may be developed appropriately, and consideration of better ways of doing it. This has not been done properly.</p> <p>But in contrast, the concept of particular sites has not been assessed adequately. Where large sites have been submitted, for example by the Duchy around Burghill, or</p>	See response to 48.46 and 48.47	No change

Ref No	Comments	PC Comments	Amendments to NDP
	<p>by Farmcare (ex Co-op) around Tillington and Burghill, the option only to develop smaller parts of these sites, thereby avoiding constraints and also obtaining a more acceptable scale like the groups of up to 7 houses which were the most favoured in questionnaire responses, has not been considered, and the sites have just been rejected out of hand.</p> <p>Timescales for Development (0-5 years, 6-10 years, 11-15 years, 16-20 years) should be considered.</p> <p>But in contrast, this has not happened at all. The way it has been done, without timescales, implies that there is going to be a free-for-all on the selected sites (many of which the community has not had a proper say in), and development could start any time soon. Is this omission deliberate, or just due to incompetence?</p>		
49.57	<p>Page 34 Para 6.1.23</p> <p>Restrictive covenants should be considered.</p> <p>But in contrast, restrictive covenants have not been considered at all.</p> <p>Not mentioned in the Guidance, but a blindingly obvious consideration to people who actually live in Tillington but who have not been adequately consulted with, is the fact that Tillington has no pavements.</p>	<p>Restrictive Covenants are governed within other legislation, and are not a planning consideration.</p>	<p>No change</p>
49.58	<p>This is a further objection following the accidental discovery of a "Site Assessment Report" buried on the Burghill Parish Council website, and on enquiry to the Parish Clerk, it was established that it was only put onto that website on 17 February 2016, FOUR WEEKS AFTER this Regulation consultation was supposed to have started.</p> <p>Para 6.1.30 contains a Table which includes a column 3 which is headed "Consultants' Rating figure". I take issue with the whole basis for rating sites because the Site</p>	<p>See response to 48.46 and 48.47 and 47.8. All comments have been responded to elsewhere within this response log.</p>	<p>No change</p>

Ref No	Comments	PC Comments	Amendments to NDP
	<p>Assessment Report (now belatedly published, but not publicised) has flaws and therefore cannot properly inform:</p> <ol style="list-style-type: none"> 1. The Assessment Report scores constraints for the sites assessed, but does not positively identify each constraint scored, and it also has 2 sets of constraints assessments, so it is unclear whether constraints have been counted twice. 2. The Report calculates 'dwelling capacity' for assessed sites, citing a figure of 30 dwellings per Hectare in Herefordshire Council Core Strategy Policy SS2. However, that policy also says that the figure is countywide and "this may be less in sensitive areas". In Tillington the existing housing density is on average only about a quarter of that, and in Burghill about a third of that. 3. Over 40 sites were submitted to the Neighbourhood Plan, but many have not been assessed at all. This seems to be because someone (not the community during consultation because people have not been properly involved) has decided that some sites are "in the countryside" and therefore they should not bother to have them assessed at all. 4. Former Farm buildings have only in some cases been assessed, but then even where they scored well, they have been left out of the draft Plan. They are being treated as though they are future 'windfalls' in the draft Plan which is crazy because (a) conversions must surely be preferable to new builds in rural areas (b) they cannot be windfalls if they were submitted to the Plan and are known about (c) they depress the numbers included for true future windfalls, (d) by not including most conversions, and preferentially including new build housing, the growth target will inevitably be overshot. Some more housing, yes. Excessive new housing, no. 		

Ref No	Comments	PC Comments	Amendments to NDP
	<p>5. Then, for Tillington, someone (not the community because it has not been consulted) has decided on a Settlement Boundary and just drawn one around 18 properties vaguely near Whitmore Cross, then allocated 24 extra houses on that person's chosen sites. That is SEVEN TIMES the so-called 18% "proportionate" "indicative" growth target. The Site Assessment Report has then scored sites at Tillington on whether they are "within the proposed settlement boundary" which someone has undemocratically determined. Obviously, sites outside their proposed settlement boundary score less well.</p> <p>6. At Lower Burlton in the south of the Parish, the large sites submitted have been assessed on the basis that their total areas were developed, and developing smaller, less constrained and more acceptable parts of them has not been considered. So they have been rejected out of hand. When the larger sites are scored against more appropriate, smaller housing groups, the assessment scores improve significantly because constraints are avoided. (Really, the residents in Hospital Houses should have been consulted on all this. They probably do not realise that this should be their Plan too, nor that the people who 'voted' for development at Lower Burlton would probably have been mainly from Burghill, because as usual, the meeting place is the Simpson Hall.)</p> <p>7. Again at Lower Burlton, the buildings at Hospital Farm (which Herefordshire Council rightly or wrongly wants to dispose of) have been assessed with a fairly favourable score but have not been included in the Draft Plan. That would be 6 conversions which would avoid building 6 new houses somewhere in the Parish.</p> <p>8. At Lower Burlton there was a Site 2C which has some apple trees on it. The assessment says "Orchard — Possible Contamination". Site 2C was rejected but it is well known locally that some properties have septic tanks</p>	<p>Based on comments from Environmental Health officers, orchards and former orchards have the potential for land contamination due to spraying of fertilisers etc. associated with their former use.</p>	

Ref No	Comments	PC Comments	Amendments to NDP
	<p>there, and with a high water table they overflow and contaminate the ground. Unfortunately, the association of 'possible contamination' with "orchards" has been copied over to all orchard sites in the Parish in this Assessment Report, and it is unclear whether that is erroneous (because the 'contamination' only really relates to that particular site, or if there is other 'contamination' on all orchard sites (for example fertiliser, which could be anywhere and in any case would dissipate naturally). The net result is that many sites containing some commercial orchard have been marked down for no good reason.</p> <p>9. Around Burghill (just like at Lower Burlton) the large sites submitted have also been assessed on the basis that their total areas would be developed, and developing smaller, less constrained and more acceptable parts of them has not been considered. So they have also been rejected out of hand. When the larger sites are scored against more appropriate, smaller housing groups, the assessment scores improve significantly because constraints are avoided. Because the Duchy and Farmcare both submitted fairly large sites, it means that for Burghill development on genuine developable sites (other than Pyefinch which now has Planning Permission in advance of the Draft Plan) has been rejected. Crazy! It is the main settlement in the Parish. There could easily be sensitive, small development (up to 7 houses) on sites tightly adjacent to Burghill's existing settlement boundary, on sites submitted by Farmcare east of Bakers Furlong, and by the Duchy north of the Copse, and again by the Duchy just south of Haymeadow/Lower Orchards.</p> <p>10. In addition, the assessment for the Farmcare Site east of Bakers Furlong says "existing estate road not capable of serving the site". Actually, it capable. The problem is that someone is trying to block access to that site because in the draft Plan they have sneakily extended an area of</p>		

Ref No	Comments	PC Comments	Amendments to NDP
	<p>"green space" north across the end of a cul-de-sac at Bakers Furlong, thereby preventing what otherwise would be sustainable development.</p> <p>11. At Tillington, as already mentioned, someone (not the community, because that has not been consulted on this) has decided on where a Settlement Boundary will be drawn. It includes 24 houses proposed to be built on 3 sites.</p> <p>a. One site is what is described as "Site 10 Tillington Business Park". But it is not 'Tillington Business Park", it is a greenfield site to the north of it. The problem is that the consultants have scored (or been told to score) the site based on both Tillington Business Park and the site proposed for housing. So this is all obfuscated, and there are at least 3 misleading factors:</p> <p>firstly, the part to the north has been assessed to have access. It doesn't, the access is actually the 'Business Park' access, so inhabitants of the new proposed housing would have to go through the Business Park, the entrance/access to which is barred by heavy locked steel gates from 6pm to early morning, so that access seems rather improbable (unless of course the real agenda is for the 'Business Park' is to be demolished, although that surely cannot be, because the Draft Neighbourhood Plan claims that it is to be 'protected for employment use.)</p> <p>secondly, the part to the north has been assessed to be in 'proximity to the proposed settlement boundary. It is (surprise, surprise) within that proposed settlement boundary which has been PREDETERMINED WITHOUT COMMUNITY CONSULTATION. so it scored higher on an unfair and false basis because it is within someone else's imposed settlement boundary.</p> <p>thirdly, Site 10 has been assessed to be "on a bus route". That is a crafty piece of obfuscation, because it is the</p>		

Ref No	Comments	PC Comments	Amendments to NDP
	<p>'employment use' part of the site which is on a bus route, not the part to the north where the housing is proposed. By the assessment report's own definitions, the part to the north where the housing is proposed should have been assessed as "close to a bus route". Again its score has been fiddled upwards by the way the site has been presented.</p> <p>The consequence is that Site 10's assessment scores have been boosted. It becomes one of the worst sites when properly scored, on its own.</p> <p>b. Another site is the one behind The Bell. The whole site has been assessed by the consultants as scoring the best in the area. However, in the Draft Plan only 4 houses have been allocated on it, and the small site actually allocated is a strange shape which indicates that it has been allocated more to provide an access for the adjacent site behind the 'Business Park' rather than because it</p>		

5.0 Regulation 16 Consultation

- 5.1 Following the end of the Regulation 14 consultation, an article was included in the Parish Magazine, advising residents of the number of representations received and the process from this point onwards (Appendix 28).
- 5.2 The Burghill Neighbourhood Plan was amended in line with the relevant comments received, and the Final Burghill Neighbourhood Development Plan, The Basic Conditions Statement and the Consultation Statement were approved for submission by the Parish Council on 8th June 2016.
- 5.3 An article was included in the Parish Magazine 2016 updating residents (Appendix 29).
- 5.4 Burghill Parish Council submitted their Neighbourhood Development Plan to Herefordshire Council on 6 July 2016.
- 5.5 The Regulation 16 consultation ran from 13 July 2016 to 24 August 2016.
- 5.6 Following the comments received at Regulation 16, Herefordshire Council, **Herefordshire Council produced a "Progression to Examination Decision Document" on 23rd September 2016. The Officer's appraisal was as follows:**

Officer's Appraisal

There have been a total of 43 representation made during the publicity period under Regulation 16 regarding the Burghill Neighbourhood Plan. Five of these have been made by internal service provider for Herefordshire Council and 6 by statutory consultees. 32 representations were received from the general public, the majority of which were residents within the parish with two representations received on behalf of landowners within the parish.

Concern has been raised within the representations regarding the process undertaken during the formulation of the document and the two statutory consultation periods with regards to the level of consultation, site assessments and availability of background / evidence documentation. A review of the parish council and community websites indicated that parish council and steering group minutes are available but there is currently there is no background or evidence base material online including any site assessment and selection information. A summary of the site selection information is available within appendix 7 of the NDP itself.

It is unclear as to when and for how long background and evidence base material was available, however we are aware that the site assessment report was not available at the beginning of the draft consultation period (Reg14).

With regards to the site allocations, in theory sufficient site allocations have been included within the NDP to meet the requirements of the Core Strategy, however, there are some concerns regarding the deliverability of some of the allocation sites. In the case of sites at Lower Burlton this has

been confirmed within consultation responses to a recent planning application (162299). There is also a high level of public concern regarding the site in Tillington and previous planning advice has raised issues regarding access and site levels.

Given the concern regarding the deliverability of three of the allocated sites, the public concern regarding the site selection process and the currently unavailability of the Kirkwell's initial site assessment work, it is difficult to conclude that the plan will enable the required growth to meet the requirements of Policy RA2 of the Core Strategy.

A review is suggested to ascertain the deliverability of proposed allocation sites and flexibility of the associated policies should it been evidence that sites allocations cannot be achieved due to constraints. It is also highly recommended that during this period of review all current and future documentation relating to site assessment and selection is available publicly and community involvement is included prior to re-submission of the plan.

Transportation and Strategic Planning have also highlighted the requirement for the inclusion of references to the Hereford Relief Road within the NDP and its associated policies maps particularly with reference to Policy B9.

5.7 Based on this appraisal the Regulation 17 decision was as follows:

It is recommended that the Burghill Neighbourhood Plan does not progress to examination at this stage and that additional consultation (under Regulation 16) is undertaken following the parish council's consideration of the issues outlined above.

5.8 This decision passed on to the community by the Parish Council in an article in the Parish Magazine in November 2016. This is included in Appendix 30

6.0 Post Regulation 16 Consultation

6.1 Following Herefordshire Council's decision not to proceed to Examination, Burghill Parish Council appointed Kirkwells Planning Consultants to

1. Review and re-writing of the following documents:

- The NDP to take account of claimed non-deliverability of designated sites and recent new housing commitments within the parish
- The relevant plans
- The Site Assessment Report with further site inspections and investigations with particular reference to issues of claimed non-deliverability
- The possibility of reduced housing numbers on sites
- The Consultation Document
- The Basic Conditions Statement
- Any other relevant/linked documents

6.2 An update on the progress in the Burghill Neighbourhood Development Plan was included in the December 2016 parish Magazine. (Appendix 31)

6.3 The Updated Site Assessment Report (USAR) was undertaken and included a comprehensive re-assessment of all the site in the original report in September 2015.

6.4 The Updated Site Assessment Report was submitted to the Steering Group and approved by the Parish Council on 12th April 2017 for public consultation, with a deadline of end of June 2017 for comments.

6.5 The Updated Site Assessment Report was posted on the Burghill Parish Council website <http://burghillparishcouncil.org/burghill-neighbourhood-development-plan/>.

6.6 In addition articles were included in the April and May 2017 parish magazines. See Appendix 32.

6.7 Paper copies were made available at Burghill Valley Golf Club, the Bell Inn, Tillington and the weekly CAP sessions held in the Simpson Hall, Burghill on Wednesday mornings, when a member of the Steering Group or Parish Council was in attendance.

Date	Numbers attending
3 rd May 2017	1
10 th May	2

17 th May	0
24 th May	0
31 st May	2
7 th June	2
14 th June	0
21 st June	0
28 th June	0

- 6.8 At the end of the consultation period, a community update was published in the parish magazine. (Appendix 33)
- 6.9 Following the deadline for comments, all responses were reviewed by Kirkwells and the final version of the Updated Site Assessment Report was produced.
- 6.10 Table 3 sets out the responses from residents submitted to the Draft Updated Site Assessment Report, together with information about how these responses have been considered by Kirkwells and have informed the amendments to the Final Updated Site Assessment Report.

Table 3 – Comments from Residents on the Updated Site Assessment Report

Updated Site Assessment Report Consultation Responses – Date July 2017

A number of comments were made in response to an anonymous letter delivered to homes in the Parish. This is included in at the end of the response table.

All comments that are of a personal nature, alleging criminal acts defamatory or derogatory have been removed. The Parish Council will make a decision on how to proceed in relation to the said comments.

Whilst some of the comments resulted in “no change” to the Site Assessments Report, amendments will be made to the Neighbourhood Plan, Basic Conditions Statement and Consultation Statement following the Parish Council’s decision on allocations.


Ref. No.	Consultee Name	Comments received	Kirkwells Comments	Amendments to SAR
1-1	James Spreckley Ltd Brinsop House Brinsop Hereford	<p>I have now had the opportunity to consider the updated Site Assessment Report and there are a number of factual inaccuracies with regard to my clients land being sites 2B and 2C, and also with regard to site 2D (not owned by my clients). I would be grateful if you could ensure that these are corrected by Kirkwells as detailed below.</p> <p>These corrections arise largely from specialist reports commissioned by my clients, of which Kirkwells would not have been aware, to address the previously raised concerns. In addition, it has now been identified in Herefordshire Council’s report 'Building Biodiversity into Herefordshire’s LDF 2009' that site 2D is a Priority BAP being traditional orchard.</p> <p>I have copied this email to Claire Bradley at Kirkwells for ease of reference.</p> <p>Given the ramifications of these corrections the body of the Report will also require consequential amendment to Section 4 Recommendation Table 2 to the extent that the most favourable score in the Lower Burlton Area is in fact site 2B.</p> <p>Factual Corrections Site Analysis - Site 2B The report states that Welsh Water commented on the Roman Road application that there are water supply problems in the area. Welsh</p>	<p>Comments Noted. The original information supplied by the Parish Council did not include this as a Priority BAP. Having researched the document it is agreed that site 2D is a Priority BAP.</p> <p>Comments noted.</p>	<p>Site 2D amended to include identification as a Priority BAP</p> <p>Amended accordingly</p>

Ref. No.	Consultee Name	Comments received	Kirkwells Comments	Amendments to SAR
		<p>Water did not object to my clients planning application on this site reference 162299 in their consultation response dated 23/08/2016 and available to view on the Herefordshire Council planning applications website.</p> <p>The report also states that there is possible contamination due to previous uses, being a former quarry. I have attached a copy of the Ground Investigation Report that confirms there is no contamination of this site.</p> <p>The report also states that there is a dispute regarding the ownership of a strip of land between the site and the A4110; this has now been clarified and the Land Registry have confirmed that the land is owned by my clients. Please refer to the attached Title and Plan.</p> <p>Appendix 2 - Scoring</p> <p>Site 2B Land north of Roman Road/west of A4110, Lower Burlton.</p> <p>Brownfield or Greenfield: 1 This should in fact be 0, as the land is brownfield land, defined as previously developed land, being a former quarry.</p> <p>Trees and Hedgerows: 1 This should be 0.5, as according to the Arboricultural Assessment and Report (copy attached) there will be minimal loss of trees and hedgerows not affecting rural character. In particular large sections of the roadside hedge can be retained/re-positioned bending the visibility splay as shown on the attached Transport Assessment drawings.</p> <p>Contamination: 1 This should be 0 as identified in the attached Ground Investigation Report dated 15 January 2016 carried out by Environmental Management Solutions.</p> <p>Accessibility: 0.5 This should be 0 as the Bobblestock bus stops are within 200 metres.</p> <p>Access:0.75</p>	<p>Comments noted.</p> <p>Definition in NPPF excludes land that has been used for extraction.</p> <p>Comments noted</p> <p>Comments noted</p> <p>Comments noted</p>	<p>Amended according</p> <p>No change</p> <p>Amended accordingly</p> <p>Amended accordingly</p> <p>Amended accordingly</p>

Ref. No.	Consultee Name	Comments received	Kirkwells Comments	Amendments to SAR
		<p>This should be 0.5 as the attached Transport Statement identifies that the visibility splays required can be readily achieved.</p> <p>Suitability: 0.5 This should be 0.25 as the attached technical reports identify only minor constraints that can be readily overcome/accommodated.</p> <p>Deliverability: 1 This should be 0.5 as the attached technical reports identify that the constraints can be overcome with some cost.</p> <p>Total out of 13: 9.75 This should be 5.75</p>	<p>Comments noted</p> <p>Comments noted</p> <p>Comments noted</p>	<p>Amended accordingly</p> <p>Amended accordingly</p> <p>Amended accordingly</p> <p>Total 6.75</p>
1-2	James Spreckley Ltd	<p>Appendix 2 - Scoring</p> <p>Site 2C Land north of Roman Road/west of Site 2B, Lower Burlton.</p> <p>Trees and Hedgerows: 1 This should be 0.5, as according to the Arboricultural Assessment and Report (copy attached) there will be minimal loss of trees and hedgerows not affecting rural character.</p> <p>Contamination: 1 This should be 0 as identified in the attached Ground Investigation Report dated 15 January 2016 carried out by Environmental Management Solutions.</p> <p>Access: 0.75 This should be 0.5 as the attached Transport Statement identifies that the visibility splays required can be readily achieved.</p> <p>Suitability: 0.5 This should be 0.25 as the attached technical reports identify only minor constraints that can be readily overcome/accommodated.</p> <p>Deliverability: 1 This should be 0 as the attached technical reports identify that the minor constraints can be overcome with minimal cost.</p>	<p>Comments noted</p> <p>Comments noted</p> <p>Comments noted. The site in itself is landlocked, however I agree access can be achieved if site 2B came forward</p> <p>Comments noted</p> <p>Comments noted.</p>	<p>Amended accordingly</p> <p>Amended accordingly</p> <p>Amended to 0.75 from 1.</p> <p>Site is backland development and is unsuitable for coming forward.</p> <p>Site can come forward with some costs associated</p>

Ref. No.	Consultee Name	Comments received	Kirkwells Comments	Amendments to SAR
		Total out of 13: 9 This should be 6.75		with 2B. Cannot come forward in isolation. Total 7.75
1-3		<p>Appendix 2 - Scoring Site 2D Land north east of Tillington Road/north west of Hospital Houses, Lower Burlton.</p> <p>Trees and Hedgerows: 0.5 This should be 1, as the site is a former traditional orchard with veteran orchard trees and a significant species rich roadside hedgerow.</p> <p>Priority BAP: 0 This should be 1, as the site is a former traditional orchard with veteran orchard trees and a significant species rich roadside hedgerow, as identified by Herefordshire Council's report Building Biodiversity into Herefordshire's LDF 2009.</p> <p>Views/Landscape Character: 0 As a priority BAP, residential development will have a significant impact on views/ landscape/character of area and this score should be 1.</p> <p>Suitability: 0.25 This should be 0.5 as the site is a Priority BAP with a significant species rich roadside hedgerow. These constitute Significant Constraints.</p> <p>Deliverability: 0 In the absence of an Arboricultural Assessment it cannot be demonstrated that the constraints of being a Priority Bap with a species rich roadside hedgerow can be overcome; this score should certainly be 0.5 and could be 1.</p> <p>Total out of 13: 6.25 This should be 9.5 or 10</p>	<p>Comments noted</p> <p>Comments noted</p> <p>Comments noted</p> <p>Comments noted</p> <p>Comments noted</p>	<p>Amend accordingly</p> <p>Amend accordingly</p> <p>Amend accordingly</p> <p>Amend accordingly</p> <p>Amended to 0.5</p> <p>Total 9.5</p>
2-	Wetland Plants	We are aware that the lack of footway on the C1095 and adjoining roads have been defined as dangerous by the following: 1) Burghill Parish Council	Comments noted.	No change.

Ref. No.	Consultee Name	Comments received	Kirkwells Comments	Amendments to SAR
		<p>2) The Planning Officer of the Herefordshire District Council 3) Members of the public under planning application 163299</p> <p>The proposal would be to construct a path on the land defined in blue on the attached plan, we would cede this land and hedge to the Parish Council it would be a path approx. 1.0-metre-wide inside the existing hedge line and we would construct a new fence to create a new boundary to our site. The hedge will be maintained as an essential corridor for wildlife</p> <p>This proposal will provide a safe pedestrian route up to the boundary with The Rise. On the C1095</p> <p>We would further request consideration of inclusion of land within our ownership and opposite The Bell Inn, indicated in red on attached plan. We note that site No 41 to the North West has been included in the Neighbourhood Plan with development restricted to the frontage of the land</p> <p>It is accepted that Tillington is designated as a growth settlement in line with Policy RA2 of the Core Strategy, however it is important that development land is reasonably adjacent to any notional settlement boundary for Tillington.</p> <p>The site we propose would in fact be closer to the settlement boundary for Tillington than Site 41, and will extend the frontage of existing development along the Tillington Road with The Rise to North East boundary.</p>	<p>The deadline has passed for the submission of sites. This is submitted very late in the process and has not been included in any consultations in the last three years.</p>	

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3	Anthony and Claire Mills	<p>I have just received a letter informing us of the proposed planning for Burghill and Tillington parish. We are surprised and annoyed that we have not been informed of all of the plans that are detailed in the letter that has arrived this morning. We do not agree with the allocation of proposed buildings and would like this decision to allow far too many houses to be reconsidered. There are not enough resources locally to sustain such a massive increase in population. Local GP practices are unable to accommodate an increase in patient population. Schools are at full limit. Many houses are being built throughout Herefordshire and the proposed 126 for our village would be sufficient without any extra.</p>	<p>Comments noted. The 18% target for Burghill Parish is identified through the Herefordshire Local Plan Core Strategy amounting to a minimum target of 124 dwellings. To date planning commitments total 106 dwellings resulting in a balance of 18 dwellings. In order to be in general conformity with the Local Plan Core Strategy, the NDP should identify the target number of dwellings to come forward in the plan period.</p>	No change
4	Kevin and Karen Davies	<p>I am writing to express my concern regarding the lack of consultation of the NDP.</p>	<p>Comments noted see 3 above.</p>	No change

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		<p>The 18% target increase has already been achieved and we do not need the parish council's expensive site assessment report currently being consulted upon.</p> <p>Also, we do not need the mini housing estates in the draft plan and we support the proposal of an NDP which only contains sites which already have planning approval plus a provision for windfalls.</p> <p>We look forward to your earliest response to our email as we are very concerned that we have not heard about this issue until now.</p>		
5	Mr Amini	<p>It is with some concern that I note that an excess number of houses are being proposed in the NDP over and above that required by Hereford Council.</p> <p>I object to any increase in housing provision beyond that which is legally obligated.</p>	Comments noted see 3 above	No change
6	Wendy Boulter and Jo Orson as a result of anonymous flyer	<p>Although we have owned our house since 2007 we were working away between 2013 and 2015 and have not been able to respond to initial consultations regarding the NDP.</p> <p>We have received communication from a concerned but anonymous local group and wish to find out clearly what the proposals currently are for house building in our area.</p> <p>We have tried to get a straightforward definitive plan with maps through looking at the parish council and indeed the Herefordshire council web sites and although there are plenty of documents and minutes nothing we can find gives us clearly the position currently and how we are being consulted.</p> <p>We are not fans of anonymous communication but it raises some issues which we would like to understand more fully.</p> <p>Please will you send us or direct us to documents that provide a clear statement of the current position.</p>	Comments note see 3 above	No change
7	John and Emma Collyer	<p>We have received a letter from an anonymous local grouping which advocates a Parishioner intervention with respect to the Neighbourhood Development Plan. We suspect you will be aware of it.</p> <p>From our perspective, the notion of an NDP that responsibly meets the wider National plan makes much sense - but we would be unsurprisingly keen that if there is an opportunity to legitimately meet our local targets within existing plans and windfalls - then this could be our preferred course of action. As its corollary, we would be keen that the PC did not commit us to a new housing liability above the 18% target and would be keen to have this view registered.</p>	Comments noted see 3 above	No change

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		More widely, we would be keen to secure an update on traffic calming measures - in our case this refers to the A4110 where we live. We sought support a three years ago for measures that would calm traffic on this road North of Portway. Frustratingly measures were taken inside Portway - which have had the knock-on effect of traffic moving even more quickly down the 4110 North of the village. The PC will be aware of 4 major accidents and countless minor ones since this time - including two separate fatalities. We expect many more. Any updates gratefully received.		
8	Paddy & Sally Townley	My wife and I are fully supportive of the NDP and believe that it needs to be pushed to ensure that no more housing above that which has been agreed and that is being met is constructed, as it will only serve the purpose to increase unnecessary construction in what is already an overcrowded parish, city and county.	Comments noted	No change
9	Mark Fenton	I have received a letter regarding the proposed NDP. I am disappointed that the initiative taken by the person or persons responsible for this letter has not been adopted by the Parish Council to keep parishioners informed! I would like to make my opinion know that I would like to keep to a maximum of 18% growth i.e. 126 houses and no more and a revised NDP should be drafted to cater for the houses identified in the letter.	Comments noted	No change
10-1	Gill Boase Pat brown David Thomas	Please find attached a response to - The request for comments on the re-assessment of the NDP (NDP News May 2017/ Report March 2017) Also comments and observations relating to a letter circulated by a private group of concerned parishioners received this week. We are in agreement with an NDP that is sensible, reasonable and appropriate for our community as it stands and falls within Hereford Council's remit and requirements (namely 18% growth through 2031 evenly and fairly distributed across the Parish and in keeping with the Parish layout, facilities and utilities). We trust that these will be put before the relevant people on the NDP SC and the PC.	Comments noted	No change
10-2	Gill Boase Pat brown David Thomas Letter	Further to the recent NDP News May 2017, we are encouraged to respond to the re-assessment report with any comments, by the end of June. Firstly, an observation regarding the Pye Finch Farm development, which also affects all future developments. AFFORDABILITY	Comments noted	No change

Ref. No.	Consultee Name	Comments received	Kirkwells Comments	Amendments to SAR
		<p>A proportion of houses on large developments need to be “affordable”.</p> <p>Those on the Pye Finch Farm development (2 bedroom), according to the builders (KBH Homes) will be available for purchase in excess of £285K.</p> <p>These “affordable” homes are intended for local people, with average salaries at around £21k and mortgage lending rules at around 5 times salary (c£100k) how can local people (nurses, junior doctors, teachers, agricultural workers and so on) be able to buy these properties.</p> <p>Therefore, who are they really being marketed to??</p> <p>Is this to be the trend for all “affordable” houses in the NDP??</p> <p>RE-ASSESSMENT REPORT - MARCH 2017</p> <p>The report makes reference to the reassessment of existing sites and covering letters to new sites.</p> <p>There appear to be no new sites shown in the report. Our understanding of the growth requirements by Herefordshire Council are set at 18% through to 2031 (some 125 houses). If this is still the case why is the new report identifying some 561 possible houses in the Parish (excluding the possible 717 at Lower Burlton - site 2A)??</p> <p>With regard to Tillington, in particular, there are some 144 houses, all but 7 to be on 6 sites. Tillington does not have a mains sewerage system to cope with this, is it permissible to have so many properties, so close together using individual septic tanks, many of which would drain into neighbouring land??</p> <p>Additionally, quite a large number of proposed sites across the plan have identified a surface water flood risk of varying degrees. We believe this maybe a superficial outcome based on existing drainage (in many areas Victorian in nature and capacity and/or a combination of open ditches - often blocked), topography and actual record, based on current housing density and location.</p>	<p>The NPPF includes a definition of “Affordable Housing”. This issue is relating to the cost of new housing and is not an issue the Neighbourhood Plan has any control over.</p> <p>The report re-assesses the sites put forward throughout the process and gives some guidance for the Parish Council/ Steering group (as was) as to the suitability of proposed sites for future allocation in the Neighbourhood Plan.</p> <p>Services and surface water flooding are included in the site assessment report. There are standards set by the Environment Agency relating to surface water run-off rates for new development</p>	

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		<p>LASTLY A CIRCULATED LETTER JUNE 2017 FROM A CONCERNED GROUP OF PARISHIONERS. If the essence of this letter has anything close to truth, this is of grave concern to us. It asks questions of vested interests</p> <p>Whilst we are all extremely grateful for a group of volunteers stepping in to carry out this difficult and time-consuming work, has the level of skill and expertise available become the reason for such a specific and wide-ranging document rather than the interests of the community?? If we need 125 (18%) new homes, why is the report so detailed it plans almost a new community?? Are the very high numbers being subliminally encouraged by local business (for commercial reasons and business growth) rather than the interests of the community as a residential area??</p> <p>The interests of the property owners and developers is to maximise profit, hence the proposed 30dph and so-called mini housing estates. Surely the Parish Council should monitor and measure the success of the Pye Finch Farm development in terms of sale to local people, social integration and appropriateness to the local vernacular (Burghill not stated/ Tillington 12 dph) before allowing further development of this type??</p> <p>FINALLY Based on both the re-assessment and circulated letter by concerned parishioners, we wish to make the following statement.</p> <p>We have no objection to the growth of the Parish in terms of housing development, provided -</p> <ul style="list-style-type: none"> • It is in keeping and appropriate to the local vernacular (style, density, location, utilities etc.). • It is in keeping with the spirit of NDP and Council requirements (not what is theoretically achievable as an academic exercise). • It adheres to the guidelines required by the Council (18% through to 2031). • It retains the nature and way of life of the existing community (including social inclusion). 	<p>Comments noted see 3 above</p> <p>Comments noted</p>	

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		<ul style="list-style-type: none"> The growth is equally distributed across the Parish as a whole. <p>Our preference is -</p> <ul style="list-style-type: none"> The NDP should state how and where the 18% (and no more) growth will be. There is no requirement to build all 125 houses immediately, some can take ten years to complete. The Parish and Hereford Council should accept it. All other (post) submissions for development should be subject to planning rules thereafter. <p>We do not believe that the following are in the best interests of our community -</p> <ul style="list-style-type: none"> The current proposals that could increase the Parish by 80% (561 houses) not 18%, including high density (30dph) sites of more than 10 houses up to 60 per site (mini housing estates). Abandonment of the NDP and a development free for all. Allowing Hereford Council to take control of development. 	<p>Comments noted</p> <p>Comments noted</p>	
11-1	Martin Crockett	<p>I e-mail you today in regard of the Burghill and Tillington NDP, as you are aware there are ongoing concerns and questions that are being addressed, so that the plan can move forward. A group of concerned Parishioners have sent a letter to all parishioners (apparently not to Parish Councillors) regarding this matter.</p> <p>I would like to reiterate my concerns with this plan, I continue to feel that the site assessments are flawed and that the area known as 'Tillington Common' has been misrepresented and was deemed to be omitted from the site re-assessments with Kirkwells. I attach the original letter sent to a Steering group member in this regard.</p>	Comments noted. A decision was taken by the Parish Council that the Tillington area was identified as the area around the Tillington Business Park, where the few services in the settlement were located, and a settlement boundary was identified around this as a settlement.	No change
11-2	Martin Crockett Original Letter	<p>I write with regard to the Burghill NDP where the Parish Council has been informed by Herefordshire Council that the consultation and deliverability on sites had not met the requirements of Regulation 16. Given the draft is being reviewed by yourselves, I would like to outline my concerns as to the consultation of site assessments relating to Tillington Common.</p> <p>The Burghill Site Assessment Report September 2015 identified all submitted sites to be considered against the criteria set out at paragraph 3.2 in terms of location, brownfield/greenfield, constraints, accessibility, access and suitability/constraints. The land that was</p>	Comments noted. A decision was taken by the Parish Council that the Tillington area was identified as the area around the Tillington Business Park, where the few services in the settlement were located, and a settlement boundary was identified around this as a settlement.	No change


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		<p>submitted by myself is identified No. 23 “The Land adjacent to the Old Chapel, Tillington Common”. The outcome of this assessment deemed the site to be “Isolated dwelling in countryside. Not assessed further. Inappropriate development”.</p> <p>From my understanding reviewing the proposed criteria with regard to the HC Neighbourhood Planning Guidance Note 21, there are anomalies as to the criteria applied for the said plot for instance: -</p> <p>Location: Why was the plot not considered as a potential infill or rounding off of a group of dwellings? The plot sits between the Old Chapel and Yew Tree House as well as dwellings on the other side of the road.</p> <p>Constraints: What constraints did they apply? Having regard to HC Planning Guidance Note 21, this outlines contamination, flooding, heritage assets and amenity. The plot does not have any constraints and would not have a detrimental affect upon amenity.</p> <p>Accessibility: It states, “on bus route/services”. It gave the plot a Zero. This plot is on a bus route, there are 6 buses a day which stops at Tillington Common.</p> <p>Access: There is now access to the land by virtue of a planning application seeking a new gate access into the plot. Planning application</p> <p>Suitability/Constraints: Having weighed up the score of each criterion, the plot scored 6 as inappropriate development. As shown above, the scoring would have been different if applied correctly.</p> <p>In light of this evidence and the inability to assess the site according to the HC Neighbourhood Planning Guidance Note 21, it is felt that the said plot should have been considered as a potential infill within the said group of dwellings having access to a bus route, with no constraints and direct access from the plot.</p> <p>In this regard I am requesting that the identified land No. 23 is given consideration as to the acceptability of considering future</p>	<p>The area north west of Tillington, around the Common was not included in the identification of the settlement, in a similar way to St Mary’s not being identified as within the Hereford or Burghill settlement boundary, due to the distance from services.</p> <p>As the site is in open countryside, it is to be assessed against Policy RA3 of the Herefordshire Core Strategy, which does not include infill sites.</p> <p>Sites in open countryside are not suitable for allocation.</p>	

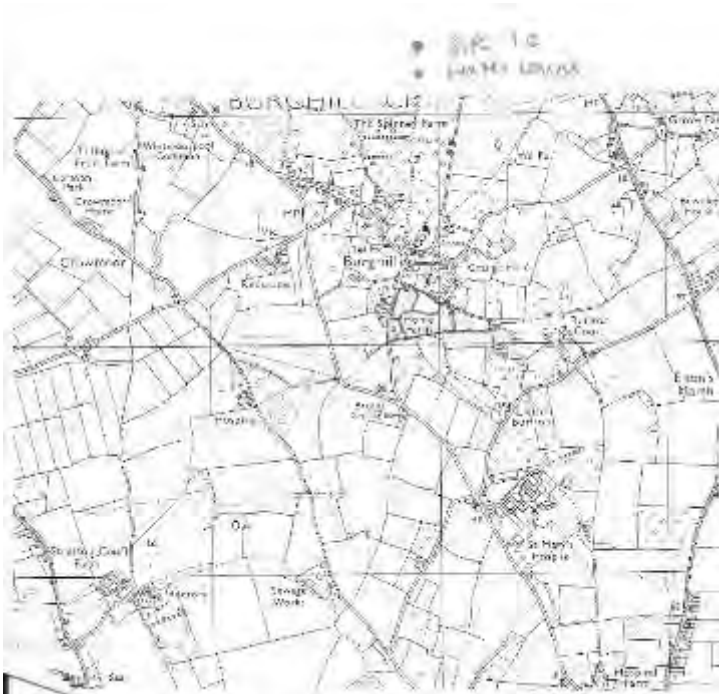
Ref. No.	Consultee Name	Comments received	Kirkwells Comments	Amendments to SAR
		development within Tillington Common. I look forward to hearing from you in due course as to the outcome of my findings.		
12	Mary C Reynolds	<p>I have read a letter sent to me from a "concerned group of parishioners". I am concerned that their arguments are not being allowed to reach parishioners through local information channels, but more importantly, if their figures and reasoning are correct, they have a strong argument to change the local NDP.</p> <p>I ask the Councillors to review the NDP with regard to making changes that will protect Burghill and Tillington from unnecessary development which will alter the rural landscape of our Parish. Please allow time for these views to be seriously considered before making a mistake which they may regret.</p>	Comments noted see 3 above	No change
13	Richard Downes	<p>Like many other members of our community, we are shocked to discover the true picture of the house building plans for our parish. The dramatic over-development of many Herefordshire villages has now become a reality with building sites popping up across the county, destroying the character of many villages forever.</p> <p>We all agree that new houses have to be built to resolve the problem of the national housing shortage, but it must be done in a controlled and democratic way.</p> <p>Many parishioners said the NDP was a cynical attempt to keep everyone sweet and that it would ultimately be ignored - that now seems to be true.</p> <p>If we have reached the agreed 18% housing increase, why are we building more?! Why haven't the wishes of the people been adhered to?</p> <p>Also, at a time of budget restraints and cost cutting, why is the council wasting public money on pointless consultations and reports. The draft NDP is essential but must be amended to contain only those sites which already have planning approval, along with a provision for 'windfall' sites.</p>	Comments noted see 3 above	No change
14-1	Michael White	With regard to the above NDP at Burghill, may I send you by way of a separate e-mail a correction which needs to be made regarding one of the sites. The attachment which I will send separately consists of an e-mail exchange with Siobhan Riddle and concerns the wrong classification of Site 10. The erroneous classification was pointed out and recorded, but the information has not yet been officially	Comments noted	No change

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		registered.....so this is the only way at the moment that you can be informed of the correction. I hope this makes sense.		
14-2	Michael White attachment	<p><i>Dear Michael</i> <i>I would suggest sending the email I sent to you April 24th as sufficient enough for Kirkwells to alter their information to show that the land is both brownfield and greenfield. The total site area of the site is 1.68 hectares. I have measured the area of brownfield land to be approximately 0.6 hectares which is slightly less than Kirkwells measurement but this is marginal. We will update the information when the next SHLAA update is due as it avoids confusion about what has changed.</i> <i>Kind regards</i></p> <p><i>Dear Mr White</i> <i>Thank you for your enquiry. HLAA/409/001 in Tillington was published in the 2015 Strategic Housing Land Availability Assessment (SHLAA) as a site with potential. The site was classified as a brownfield site as there was existing development on the lower part of the land. The northern area of the field is considered to be greenfield therefore it would be correct to have both categories (Greenfield and Brownfield) on the SHLAA form. This will be updated in the next publication of the Rural SHLAA in the coming months.</i> <i>Regards</i></p>	<p>Comments noted</p> <p>The site was scored in the updated site assessment report as Greenfield. However, based on this information it will be amended and scored part brownfield/part greenfield</p>	Amend Site 10 to score 0.5 for Brownfield/ Greenfield
14-3	Michael White further response	<p>Here are my comments/views on the USAR produced for Burghill Parish council by Kirkwells.</p> <p>It is worth pointing out that, for the vast majority of the parishioners, the revised version of the SAR is just bewildering! There are many errors in the USAR as it stands, and the original is no longer available on line for comparison purposes. being able to see what changes have been made is almost impossible.</p> <p>At the most recent Parish Council meeting it was stated that both Kirkwells and the chairman of the NDP Steering Group thought the USAR was no longer fit for purpose.</p> <p>The Chairman of the Steering Group stated at this meeting that all sites had been re-assessed whereas the USAF states otherwise. Who is correct?</p>	<p>Comments noted.</p> <p>The USAR forms part of the process of site allocation. It gives a desktop evaluation of sites. It is for the Parish Council to use this information together with identified and justified local knowledge to select the sites for allocation in the Neighbourhood Plan.</p>	No change

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		<p>In putting forward this USAF, the wider community have had no recent input, except for comments at Regs 14 & 16. The fact that ACCESS was a major problem for some sites, and the fact that ACCESS has not been taken into account in the USAR, speaks volumes! Deliverability was all about suitability for sites to be included in the original plan. So, how do you get round that? You simply don't count ACCESS in the re-jigging of the points system! Easy! So, splays, visibility, distances, safety, don't come into the reckoning. This is all to do with deliverability and yet it has been ignored for the scoring system. Clever stuff! (...and whose idea might that have been?!!)</p> <p>Having a points system where the 'best score' is 'Zero' has to be scored!</p> <p>Will Kirkwells come back with recommendations after they have studied the responses from the parishioners? If so, will the wider community see them....in their entirety? Will the wider community have a say in what follows? It hasn't happened much in the past.</p> <p>It has been interesting to watch the activity of the 'Parish Council' recently with regards to their objections to recent planning applications within the parish. A recent application was objected to as follows: In the countryside so the countryside has to be protected; within 100m of a working orchard; not on a bus route so a car will be needed; blind spots at both ends of lane; flooding. Most of these objections could be applied to some of the sites in the USAF! Can you believe it? Yes, sadly, it is so predictable. Is it anticipated that families living in new houses in Tillington are NOT going to have a car because they are on a bus route? Ever tried travelling to Canon Pyon, Credenhill, Weobley, even Hereford after 7pm? They WILL need a car!....on a bus route or not.</p> <p>I personally feel that the cost of such an updated assessment has not been a good use of public money. It will be counted as 'consultation with parishioners' but the whole ND Plan has never openly welcomed public participation since the very early attempts when the Plan was being launched. Since those early attempts at consultation, the general public (and occasionally members of the Parish Council) have had their inputs rebuffed or ignored. In fact, participation by</p>	<p>Access is assessed in terms of whether or not access can be achieved to the site.</p> <p>The consultation comments and responses will be published in the Consultation Statement which will be a public document.</p> <p>The scoring is system is based on the availability of public transport/local services.</p> <p>A number of consultations have taken place as part of the Neighbourhood Plan Process, including the initial Options Days consultations, the Regulation 14 consultation, the Regulation 16</p>	

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		<p>members of the wider community has met with resistance. Even an attempt by a member of the public to have the 'Officer's Appraisal' printed in the Parish magazine so that everyone was aware of the shortcomings of the Plan, was blocked with no explanation or apology. One of the Steering Group members is an editor of the Parish Magazine.</p> <p>If one were to look at the Guidelines on ensuring the parishioners are actively encouraged to be involved in the NDP, put forward by Herefordshire Council for the procedure of a NDP, it can be seen just how poorly the Burghill plan has performed against this list.</p>	<p>consultation and this consultation on the Site Assessment reports.</p> <p>The parishioners were actively involved in the Options Days consultation which formed the basis for the development of the Neighbourhood Plan policies.</p>	
14-4	Michael White further response	Re my previous comments, I would like to withdraw my statements regarding the site grading/markings. I erroneously stated that there was no assessment of Access in the USAF. I was wrong and apologise for my mistake.	Comments noted	No change
15-1	Jenny Gay	Map of Constraints on Site 1C	Comments noted.	Site Assessment sheet amended accordingly

Ref. No.	Consultee Name	Comments received	Kirkwells Comments	Amendments to SAR
		<p style="text-align: center;">Burghill Neighbourhood Development Plan Burghill Neighbourhood Development Plan Site Analysis</p> <p>Site Reference – S10.1C Site Address: Land between Haymarket Farm and Home Farm, Burghill Area: 0.1 Hectares Proposed use: Residential Potential capacity (Based on 30 dph) – 124 dwellings</p>  <p>© Crown Copyright and Geo Information (2018) Ordnance Survey (OS Licence No: 100025200) Burghill Parish Council (2018) Ordnance Survey (OS Licence No: 100025200)</p> <p>Characteristics: Large site located to south of village, adjacent to settlement boundary on two sides (north and west).</p> <p>Existing uses: Arable cropping Provision: None on site Grade: Agricultural land Soils: Field Adjacent uses: Agricultural/residential Existing links: Local footpath Flood: Zone 2 Soil: Low to high risk of surface water flooding Risk: High to very high of flooding Groundwater: Adjacent to the Coalbrookdale Adjacent to the Coalbrookdale (to south and west) and to the north (to east) TPO: No debate Access: Adjacent to the Haymarket Farm Electricity cables: None on site – N/A above ground, but access to business Updated Site Assessment Report – March 2017</p> <p><i>Major sewer runs through site</i></p>		
15-2		<p style="text-align: center;">Burghill Neighbourhood Development Plan</p> <p>Utilities would be required to service the site Footpath B335 crosses the site Existing access to site from Burghill Lane. Creation of new access would be required to service any future development. No sign of contamination or any watercourses within the site. <i>Under 0.5m depth of soil</i> Site located at a distance of 560m to bus route 637, (stops at Leatdown), and Burghill village services</p>		Site assessment sheet amended accordingly

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15-3	Jenny Gay further response	<p>Please advise if you have received my paperwork sent 27th June by 1st class post. I am concerned that other parishioners have mentioned this site in their submissions relating to the USAR and that one has included a map supposedly from welsh water detailing the sewerage pipes etc. I do not agree with the positioning of the pipe on the map as we have recently had a blockage in the pipe in the field adjacent to our property. This is as on my plan. Also there is a question mark where the sewer pipe runs from Lower Orchards down near Haymeadow Farm. This pipe has been connected to the one serving the properties in Haymeadow Lane at the manhole where the blockage occurred, it runs along the edge of site 1C adjacent to our properties.</p> <p>I also mentioned water courses in my submission. There are at least three separate water courses in site 1C, the main one was piped when hedges were grubbed out to make 3 fields into one years ago (possibly early 1980's).</p>	Comments noted	Site Assessment sheet amended accordingly

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		I appreciate that you have probably been inundated with emails in the past few days regarding this NDP, but would like to receive acknowledgement of this email.		
16	Andrew and Fiona Bailey	<p>While we accept the need for growth, it would appear that we have already exceeded the target acceptable to HC.</p> <p>The larger schemes will inevitably produce sudden demands on local services and infrastructure, that may or may not be able to cope. If we can achieve an acceptable level of growth with smaller developments, this would happen more gradually allowing services to evolve.</p> <p>This would rely more heavily on "windfall" developments and require a wider zone of permitted development to include these more diverse sites.</p>	Comments noted	No change
17	Susan Olver	<p>I understood that the Core Strategy indicates the proportional growth target, which is based on the number of dwellings in the Parish. A figure of 684 dwellings in the Census 2011 figures, which means the housing growth target would be approximately 123 new dwellings. The new figures exceed this number. Have the goal posts changed?</p> <p>Site 2B potential capacity base on 30 dwellings per hectare means more dwellings than before, which is not in keeping with the other properties nearby. 0.7 hectare and building 21 dwellings.</p> <p>Site 2 C a 0.76 hectare with 22 dwellings</p> <p>Site 2D a 0.4 hectare with 12 dwellings</p> <p>Site 2 B a 0.5 hectare a capacity for only 2 dwellings</p> <p>Site 21 seems OK with 30 dwellings</p> <p>Site 35 a 1.8 hectare with 54 dwellings</p> <p>Site 36 a 0.91hectare with 27 dwellings - no realistic as it would start to merge two villages together Tillington and Burghill which would alter its appearance.</p> <p>Site 10 is OK with 8 dwellings assuming no surface water issues</p> <p>Site 13 a 1.59 hectare with 47 dwellings still too many especially with poor access and surface water issues</p> <p>Site 22 is OK with 4 dwellings that would help the Bell Inn</p> <p>Site 25 is OK with 6 dwellings</p> <p>Site 29 is not suitable</p> <p>Site 41 moving westwards is not appropriate.</p> <p>It is understood that we all will be consulted before the Parish Council passes this plan over to Herefordshire Council and then hopefully we can have a binding Neighbourhood Development Plan. I am keen to</p>	<p>The report re-assesses the sites put forward throughout the process and gives some guidance for the Parish Council/ Steering group (as was) as to the suitability of proposed sites for future allocation in the Neighbourhood Plan.</p> <p>The USAR forms part of the process of site allocation. It gives a desktop evaluation of sites. It is for the Parish Council to use this information together with identified and justified local knowledge to select the sites for allocation in the Neighbourhood Plan</p>	No change

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		<p>promote Herefordshire as a rural county and not to have too many houses in an estate, it only leads to division between neighbours. Please can the Parish exploit the already identified "windfall" sites as a first step and watch out for problems around natural springs and ponds when increasing dwellings.</p>		
18	J I Robertson	<p>I am writing in response to the Updated Site Assessment Report and would like my comments below taken into consideration prior to a final draft of the Burghill Neighbourhood Development Plan being approved.</p> <p>Site Reference 35 Land to East of Bakers Furlong, Burghill Bakers Furlong currently serves 30 properties, a mixture of houses and bungalows. Access to the estate is via the main village. The houses were built in the 1970's and after considerable effort by the residents and local councillor, the road was finally adopted in May 2008 following a battle with Herefordshire Council over poor visibility and a substandard junction. Since 2008, car usage in Bakers Furlong has increased and with the proposed 54 dwellings at Site 35, accessing Bakers Furlong via the substandard junction would increase the risk of car accidents and jeopardise the safety of pedestrians. There is also the added problem of vehicles parking outside properties adjacent to the junction which forces cars using the main village road over to the junction. Another concern is that the splay to the right of the junction towards the Simpson Hall has poor visibility due to a high conifer hedge and a right-angled splay.</p> <p>General Comments There is a history of sewerage problems in the main village and at the time of adoption in 2008, we were advised by Herefordshire Council that the main sewer in the village was near capacity. With 24 houses currently being built on the site opposite Burghill Golf Club plus any additional housing will only add to the already existing problems</p> <p>At the top of Bakers Furlong where the 54 dwellings are proposed, these properties would encroach on a well-used public right of way through the orchards. I am also concerned about the impact the properties will have on the character and setting of The Church of St Mary's and on the former ancient castle site.</p> <p>The main village of Burghill has had considerable housing growth over the past years and any further housing should be on small sites</p>	<p>Comments noted.</p> <p>Comments noted</p> <p>Comments noted</p> <p>PROW and character and setting of church are included in Site Assessment</p> <p>Comments noted</p>	<p>Site assessment report amended accordingly</p>

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		<p>and spread evenly around the parish to protect the uniqueness of our village. The design and materials of housing should also enhance the character of the village.</p> <p>I support the green area between Bakers Furlong and Leasown to remain as a Protected Open Space as this has an amenity value to the local area; this amenity value was upheld by a Planning Inspector at a Planning Application Appeal.</p> <p>I hope these very genuine comments and concerns will be taken into consideration when the Parish Council finalises the draft plan prior to a referendum.</p>	Comments noted	
19	Caroline Bulmer	<p>Re the 2013/16 Burghill Neighbourhood Development Plans (NDP)</p> <p>I understand the Parish Council's commissioned 2103 NDP went before Hereford Council in September 2016, but was rejected due to its lack of consultation with the parishioners. The Parish Council has since commissioned a further repost and plan to be circulated for consultation. The Repost, I am told, has its failings in so far as time has changed the circumstances surrounding Burghill's housing needs.</p> <p>More importantly it seems that many parishioners remain unaware of what this new plan will mean in terms of the number of new houses to be built within the village. This is because the Parish Council's proposal does not appear to recognise the newly granted permission for approximately 107 new dwellings added recently to the village under Hereford Council's RD plan for Parishes.</p> <p>I am now informed by a 'Concerned Group of Parishioners' and their leafletting that the Parish's new report and planned proposals suggests adding 60 or so dwellings and that these 60 will be in addition to the 107 mentioned above.</p> <p>I am sure that I'm not alone in my concern that an additional 167 homes within Burghill will fundamentally change the village, I note that the consultation question suggested two thirds of the village thought that a 10% increase in dwellings would be appropriate. We now appear to be facing a 25% increase!</p>	<p>The Neighbourhood Plan did not proceed to examination due to concerns with the deliverability of some sites. Herefordshire Council are satisfied that the original Regulation 14 consultation was carried out in accordance with the Neighbourhood Planning Regulations.</p> <p>A number of consultations have taken place as part of the Neighbourhood Plan Process, including the initial Options Days consultations, the Regulation 14 consultation, the Regulation 16 consultation and this consultation on the Site Assessment reports.</p> <p>See comments to 3 above</p>	No change

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		<p>It may be that I have it all wrong but I am sure I will not be alone in being confused and concerned and as such I do think it is vital that the Parish Council does it's duty to consult us all so that there will be no surprises that might cause division within our community.</p> <p>The village of Burghill is special as is it's community that lies at it's heart, to risk this cohesion by lack of clarity, would do it and the officers of the Parish Council great harm.</p> <p>It must be the responsibility of the officers to act in the interests of all Parishioners without grant or favour and that it brings an open book approach to it's dealings so that future angst can be averted.</p> <p>I do think it would be helpful to have the matter publicly aired with all parties/parishioners being able to express their opinions.</p> <p>Mine is certainly to have a Parish Council Plan and thank you for undertaking to two this, but I would urge the team to accept what has been granted as enough, but still allowing some further development such as those termed and Windfall approvals i.e. the sympathetic conversion of former agricultural buildings and appropriate infill, but based on a case by case basis.</p> <p>Please could you acknowledge this email and confirm that its contents has been conveyed to the PC as a whole and to it's Steering Group.</p>	<p>Comments noted</p>	
20	Denise Reynolds	<p>For your information our home is directly affected by Site 2b.</p> <p>We note that the updated report for site 2b now acknowledges the issues which we raised regarding its unsuitability for development. These issues and others were also raised in respect of a planning application in 2016 which Herefordshire Council were minded to reject. They offered the site owner the opportunity to withdraw the application and they duly did so.</p> <p>The updated site report vindicates our concerns about site 2b being included in the NDP. We also feel our concerns about the inadequacy of the original site 'assessments' have also been vindicated.</p> <p>The entry in the parish council magazine implies that the NDP will be re-visited once parishioners have had the opportunity to comment on the revised assessments. We sincerely hope that this will be the case. We are not only concerned about the site which has the most</p>	<p>Comments noted. As a result of this consultation, further amendments have been made to Sites 2B, 2C and 2D. See response to 1 above.</p> <p>The USAR forms part of the process of site allocation. It gives a desktop evaluation of sites. It is for the Parish Council to use this information</p>	No change

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		<p>immediate impact for us but also about the NDP overall. We remain of the view that the consultation for the NDP fell short of meaningful, inclusive and open consultation because of the lack of responsiveness to those who engaged with the process. Now that revised site assessments have been completed and you have issued this for consultation we are hopeful that this indicates meaningful discussions can take place about the NDP as a whole.</p> <p>We came home from holiday recently to the letter from in-named parishioners. In an ideal world this should have been included in the parish magazine in the interests of balance, community involvement and inclusivity. We have read the information in this letter. We do feel that the writers make valid arguments regarding the NDP and the numbers of houses needed to fulfil the 18% target. Once the updated site assessments have been reviewed we hope that that these can be discussed openly - perhaps at meeting for the parish specifically for the purpose?</p> <p>I have not been able to attend PC meetings for a while due to work and family commitments but had started to attend to take a more active interest in parish business. I always stayed for the whole agenda. My recollection is that when it was decided to ask Kirkwells to re-visit the site assessments it was agreed that they would be asked to present their findings to such a meeting. I wondered why this has not happened?</p> <p>Burghill parish is subject to a large amount of surrounding development and it is so important that we do what we can to mitigate the negative impact of this so I totally support the need for an NDP. I would like to repeat my offer to provide practical assistance when the NDP is re-visited eg delivering information to parts of the parish or helping with refreshments at public meetings. Thank you for the opportunity to comment of the updated assessments.</p>	<p>together with identified and justified local knowledge to select the sites for allocation in the Neighbourhood Plan to go forward for submission.</p> <p>Comments noted see 3 above</p> <p>Kirkwells attended PC meeting on 12th July 2017 to respond to questions from the Parish Council.</p> <p>Comments noted</p>	
21	Franca Lyddon Thomas Lyddon	<p>I am writing to express my concerns over the current proposals for new housing in the draft plan. Villages have to grow but this must be done sympathetically and proportionately whilst being fair to the inhabitants. As I understand, the requirements for an 18% increase by 2031 required by Herefordshire Council can be met by planning</p>	Comments noted see 3 above.	No change

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		<p>permissions already granted and windfalls. We do not need the mini housing estates in the draft Neighbourhood Development Plan. This is a rural environment and every effort should be made to maintain this by maximising the windfalls and current housing areas. This will reduce the strain on current infrastructure, making our village safer and more environmentally friendly for future generations.</p>		
22	Robert Hodges	<p>This is a short letter to Inform you after reading a recent letter from the local group of parishioners, I support the proposal of a NDP. I have been shocked and concerned at the information held in this letter and strongly support there concerns. I have lived in the area all my life and agree to new property's for the upcoming generation but Burghill/Tillington has already had its share of building and barn conversions to cover this.</p>	Comments noted see 3 above	No change
23	Martin Roberts	<p>I wish to register, yet again, my serious concerns and objections regarding the latest Updated Site Assessment Report for the Draft Burghill Neighbourhood Development Plan. The previous NDP was rejected by HC last year with undeliverability of sites, site selection and lack of consultation being cited. These reasons have, in the latest USAR, not been addressed. Sites are still undeliverable, site selection is still flawed and there has again been minimal consultation and engagement with parishioners. Indeed the latest USAR which we, as parishioners, have been asked to comment on is not fit for purpose as acknowledged by the SG chairman and Kirkwells. Recommendations by Claire Bradley, representing Kirkwells who wrote the report, that we should go back to Regulation 14 have not been made public and presented to parishioners. This is a vital piece of information that should have been, but wasn't, in the public domain. Negligence regarding proper consultation! We were promised that all sites would be revisited and reassessed. This has not happened. It can be evidenced in an email from the SG chairman. This makes the scoring system in the appendix completely flawed. Fundamental issues relating to deliverability such as access, visibility splays, drainage, sewerage, water supply, flooding, road safety issues, the list is endless, have not been addressed. Stated areas for some sites are incorrect giving misleading information suggesting the site is larger than it actually is. There has never been any consultation on settlement boundaries. The 'Tillington Common' issue was dealt with by HC in March 2015</p>	<p>The Neighbourhood Plan did not proceed to examination due to concerns with the deliverability of some sites. Herefordshire Council are satisfied that the original Regulation 14 consultation was carried out in accordance with the Neighbourhood Planning Regulations.</p> <p>With regard to this, it was based on the amended site assessments. The PC have since carried out this consultation on the Site Assessment Report which will form part of the evidence base of the Neighbourhood Plan.</p> <p>The USAR forms part of the process of site allocation. It gives a desktop evaluation of sites. It is for the Parish Council to use this information together with identified and justified local knowledge to select the sites for allocation in the Neighbourhood Plan to go forward for submission.</p>	

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		<p>and again in April 2017. This information has never been made available to parishioners. Another example of negligence regarding proper consultation!</p> <p>Issues regarding proportionality have not been addressed. Certain areas in the Parish still have a vastly disproportionate allocation of possible housing numbers.</p> <p>Finally, and perhaps most importantly, Burghill Parish has already achieved the 18% growth target with existing planning permissions and allowable windfalls.</p> <p>I repeat. This USAR is not fit for purpose.</p>	<p>A number of consultations have taken place as part of the Neighbourhood Plan Process, including the initial Options Days consultations, the Regulation 14 consultation, the Regulation 16 consultation and this consultation on the Site Assessment reports.</p>	
24	John and Caroline Winter.	<p>I understand that there is a proposal to build 54 houses in the orchard with access from Bakers Furlong. I therefore trust you will take my comments and concerns into consideration.</p> <p>1 The splay is not up to standard and gives poor visibility. 2 There is a history of sewage problems in the main village that was identified by blockages on many occasions 3 There is a public footpath in the orchards which is at the top of our road which must be protected. 4 I understand that the green area between Leasown and Bakers Furlong is a protected open space.</p> <p>When you meet to discuss this matter will you please observe these genuine comments.</p>	<p>Comments noted. See response to 18 above</p>	<p>No further change</p>
25	Keith Cawte	<p>Having read the Updated Site Assessment Report- March 2017 I must say that whilst I wholly endorse the observations made it concerns me considerably that the 52 dwellings proposed will greatly increase traffic flow through the village as on average it must be assumed each dwelling will have at least 2 vehicles which means over 100. Additionally in this age of "Home Deliveries" this proposed development together with the many others outlined will lead to a substantial increase in delivery vehicles accessing the existing road network which services the village.</p> <p>Also the proposed access to the development as well as being on a tight 90-degree bend is within 40 metres of an already dangerous road junction.</p> <p>Not shown on the village map used for the report are 2 new dwellings which lie immediately on the Southern edge approx. 1 metre lower than the site from which the nearest is about 4 metres. This is occupied by myself and the high water table leads to water</p>	<p>Comments noted.</p> <p>The surface water flooding information is taken from the Environment Agency website.</p>	<p>No change</p>

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		<p>logging which I fear will be compounded by the proposed development.</p> <p>I am not a "Nimby" but genuinely concerned for the negative effect this possible development will have on the village and the water logging associated with my residence.</p> <p>Please will you ensure these observations are taken fully into account when final decisions are made as to my mind of the many sites under consideration, this must be the most unsuitable.</p>		
26	Mrs.C Harding	<p>I note from a letter received from a concerned group of parishioners that you are proposing to extend the 18% target growth required by the Hereford Council for the NDP I would therefore like to express my concern over this. Why would we want to destroy anymore of our countryside and village? aside from the amount of traffic this will generate on the Tillington Road a (country type road) and on to the Roman Road will be horrendous causing more road damage and traffic holdups.</p>	Comments noted see 3 above	No change
27	Paul and Jo Morgan	<p>We are writing to you to express our concerns for the proposed siting of additional housing to the East of Bakers Furlong (Site reference 35). We would request that our comments be taken into account by the Parish Council, prior to the approval of the final draft of Burghill Neighbourhood Development Plan.</p> <p>Firstly, we would like to raise the issue of flooding, caused by run-off water from the orchards, during the winter months. We raised this issue with the Parish Council some years ago when proposals were being put forward to clear and develop the gully, which runs from the top end of Bakers Furlong and along Leasown, to the village road. During the winter, the run-off water from fields, builds up with natural spring water in the orchard and floods the orchard track outside our house and our garden. On one occasion, we contacted the then Manager of the Co-op Farms, so he could witness the flow of water, which at its greatest, ran under our house and out of the wall onto our neighbour's drive. Despite having dug a drainage ditch along the edge of our garden, the flow of water remains such that the garden and surrounding area become waterlogged every year. We believe that additional housing would exacerbate the flooding, as the drainage system within the village is already insufficient to carry the run-off water.</p> <p>Secondly, we would like to raise issue of poor water pressure in Bakers Furlong. Our property is at the end of the line and therefore has very low water pressure. At times the pressure is insufficient to</p>	<p>Comments noted.</p> <p>The surface water flooding information is taken from the Environment Agency website.</p> <p>Comments noted.</p>	No further change

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		<p>run a shower or a hose pipe. If the pressure on the line is increased by Welsh Water, this has resulted in properties at the lower end of Bakers Furlong, having water where the pressure is too high. Again, this is an issue which is pre-existing and would only be heightened by additional properties to the east of Bakers Furlong.</p> <p>Thirdly, the village has undergone considerable growth in housing over the past few years. The Parish target for housing growth, set by Herefordshire Council was a minimum of 18% (124 homes) between 2011 and 2031. The number of houses currently proposed in the Parish Council Plan, far exceeds this and it our belief that this development will not only affect the character of the village, but put increased pressure on existing services such as water and sewerage systems, already at full capacity.</p> <p>Finally, the entrance/exit to Bakers Furlong is substandard with poor visibility. The increased traffic from the proposed development would cause an increase in the risk of accidents, not only to vehicles but also to pedestrians.</p> <p>Many thanks for taking time to read our concerns and we hope that these will be taken into consideration when the Parish Council finalises the draft plan for Burghill.</p>	<p>Comments noted. See response to 3 above</p> <p>Amended in accordance with 18 above</p>	
28	Donald & Margaret Mawson	<p>We are concerned to learn that 54 dwellings are proposed for site 35. Bakers Furlong has a very poor junction access to the main village road, having a narrow splay. For instance vehicles turning right out of Bakers Furlong it is necessary to pull forward at least a car bonnet's length into the village road to gain safe visibility.</p> <p>We have also experienced sewage problems indicating that the sewage pipes are inadequate for current needs let alone for an additional 54 houses.</p> <p>The infrastructure of Burghill with narrow lanes, poor visibility road junctions, plus the 24 dwellings currently being built opposite the Burghill golf course with an additional 54 homes will only compound these problems.</p> <p>I would also add that there is a public foot path which crosses the top of Bakers Furlong in the orchard.</p> <p>We think that smaller clusters of homes say 5 to 10 would be more in keeping with the character of Burghill.</p> <p>We hope that the above issues will be considered by the Parish Council.</p>	Comments noted. See 27 above	No change

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29	H T Hanson	<p>I am writing in response to the above and would be grateful if my comments below are taken into account prior to a final draft of the Burghill Neighbourhood Development Plan being approved.</p> <p>Site Reference 35 Land to East of Bakers Furlong, Burghill</p> <p>At present Bakers Furlong supports 30 properties. If this number is increased (with the proposed 54 dwellings at site 35) it is felt this could lead to problems with safety. The main issue lies with the junction that is the entrance to Bakers Furlong. The field of view when turning in and out of this junction is poor as it provides restricted visibility. This is particularly evident on the Western side of the junction where it is assessed the likelihood of a collision is increased due to the built-up area immediately surrounding the junction. I have two young children and regard this junction as the most dangerous part of the road due the restricted coverage it offers. It is felt that increased traffic in and out of Bakers Furlong will place pedestrians at further risk and exacerbate the safety of pedestrians and motorists alike. Moreover, the children from Burghill Community academy use Bakers Furlong to undertake their cycling proficiency assessment as it is considered the most suitable place within the surrounding area.</p> <p>An additional concern are vehicles being parked outside properties flanking the junction. This forces motorists to drive over to the area of the junction even when not deviating from the main road through the village. This is significantly more dangerous when there is a large wedding or funeral being held at the Church of St Mary's (as there is virtually no parking spaces at the church) or an event being held at the Simpson Hall; leading to multiple cars being parked up and down the street.</p> <p>Another concern is at the Eastern end of Bakers Furlong (where the 54 new properties are proposed). These dwellings would be constructed within the beautiful surroundings of the orchards where they would infringe on an extremely popular and well used public right of way that passes through the orchards. It is felt this would have a significant impact on both the character and splendour of this area that overlooks the Church of St Mary's and the old castle site. I would also like to point out that the village of Burghill has already been subject to accepting a substantial increase in housing over the last few years. It is requested any further housing developments</p>	Comments noted. See 27 above	No change

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		<p>agreed to be dispersed evenly around the Parish as not to compromise the character of the village. The charm and uniqueness of Burghill is one of the main reasons my wife and I decided to move and raise our family in the village in the first place.</p> <p>In summary my wife and I are strongly opposed to the increase in dwellings along Bakers Furlong. This will simply lead to an increase in the volume of traffic within this small village creating safety concerns and damage the charm of this unique village. I trust my comments and views will be taken into account when the Parish Council finalises the draft plan prior to a referendum.</p>		
30	Simon Davey	<p>I suspect I am not the only person to contact you since receiving a letter from a group of "concerned parishioners". I have not followed the NDP issue religiously but have attended a couple of exhibitions in the Simpson Hall.</p> <p>I was however somewhat surprised to read the content of the recent letter with regard to the proposed number of new houses within the parish assuming that we would/should be looking for an agreement with the Council to build only the MINIMUM number required?</p>	Comments noted see 3 above	No change
31	Clare Fenton	<p>As a member of the Steering Group, it saddens me to have to respond to the USAR formally. At the only meeting scheduled to discuss this matter we were advised our purpose, on this occasion, was to 'proof read' only. Everyone who mentioned any concerns was told by the Steering Group Chairman that all we were doing was looking for inaccuracies to allow it to be presented to the Parish Council. The USAR would then be presented for comment by the community. At no point was it suggested that this would be the only consultation with the community and the NDP would progress to the regulation 16 stage after the USAR had been published. In fact, this progress has never been formally agreed by anyone in a public forum.</p> <p>I was amazed that following the introduction of Permission in Principle along with the Settlement Boundary issues raised between the Steering Group meeting and the subsequent Parish Council meeting that the USAR was still presented to the community. It needs to be considered that both the Steering Group Chairman and Kirkwells themselves have stated that the USAR no longer fit for purpose. They have also both stated (the Chairman in his email to Steering Group members and Parish Councillors on 11th April 2017 and Kirkwells in their letter also dated 11th April 2017) that we may</p>	<p>The Neighbourhood Plan did not proceed to examination due to concerns with the deliverability of some sites. Herefordshire Council are satisfied that the original Regulation 14 consultation was carried out in accordance with the Neighbourhood Planning Regulations.</p> <p>With regard to Kirkwells letter, this was based on allowing the community to comment on the amended site assessments. The PC have since carried out this consultation on the Site Assessment Report which will form part of the evidence base of the Neighbourhood Plan.</p> <p>The USAR forms part of the process of site allocation. It gives a desktop</p>	No change

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		<p>have to return to regulation 14 stage, Kirkwells actually strongly recommend this. The fact that this information has not been explained and presented to the Parish either on the website or in its magazine inserts is misrepresentation.</p> <p>The way the USAR document and its accompanying explanation is presented to anybody reading it is confusing. I feel that Parishioners may be daunted by the document as well as confused, something I raised at the Steering Group. It was agreed that Kirkwells would present the document with explanation to the Parish Council at an extraordinary Public meeting which would have allowed the community to have a better chance of grasping the concept. This never happened, however, the Steering Group chairman did suggest the document could be open for discussion at the Parish AGM. As sufficient notice was not given for the AGM many, including myself, were not aware that it was not at the normal meeting time of 7.30 and missed it. That said, I don't believe anything was presented to the community and no draft minutes have been published. The CAP sessions are at times that are not convenient for many Parishioners.</p> <p>Although the documents were presented at the pub and golf club, the Steering Group members were instructed by the Steering Group Chairman to say minimal on it. As a minimum, they should have been presenting and explaining the contents of Kirkwells letter and what effect this has on our NDP.</p> <p>Based on Pip, the first and most important comment is that safe access and visibility splays have not been considered. I raised at the Steering Group meeting and asked why access hadn't been given more importance being a minimal requirement for planning. I was told by the Steering Group Chairman that access wasn't the only significant considerations. At this point why, knowing that Permission in Principle was coming into force, did the SG Chair not suggest that any site with a dangerous access was given the highest score and not considered. If he felt that there were other key factors, why did he not suggest the same approach for those matters too? In fact, this has been the approach taken for 'Open Countryside', if it can be done for one significant constraint, then why not all? Let's face it SAFETY should be the number one priority in the Parish and this could be deemed as negligent.</p>	<p>evaluation of sites. It is for the Parish Council to use this information together with identified and justified local knowledge to select the sites for allocation in the Neighbourhood Plan to go forward for submission.</p> <p>A number of consultations have taken place as part of the Neighbourhood Plan Process, including the initial Options Days consultations, the Regulation 14 consultation, the Regulation 16 consultation and this consultation on the Site Assessment reports.</p> <p>Whether access can be achieved or not has been assessed in the report</p>	

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		<p>I have volunteered to help work out safe visibility splays previously but was knocked back by the SG Chair, community knowledge and previous planning applications could also have been used in the same way they are when the PC discuss planning applications generally.</p> <p>As previously highlighted in my letter to Kirkwells the size of some sites are still being misrepresented.</p> <p>The Settlement Boundary issue around Tillington and Tillington Common means that sites previously not assessed because they were deemed in Open Countryside have been unfairly scored, this also increases the 'Windfall' chances.</p> <p>The assessment is bias towards certain sites, the Steering Group were advised by the SG Chair that ALL site owners would be approached. This was not the case and this has resulted in certain sites being incorrectly assessed. For example, White Roses has been incorrectly represented and is linked with site 2B and deemed only deliverable along with Site 2B. They are completely independent and in fact White Roses sits several metres higher than 2B and has its own independent access with reasonable visibility splays.</p> <p>Matt Tucker of Savills also asked to be kept informed of the USAR, if he has not been contacted then this could leave the Parish in a very vulnerable position.</p> <p>If we do not return to Regulation 14 and allow sites that were included in the original plan to remain then any site with a lower score should also be included, this would be a travesty.</p> <p>Two scoring methods have been used which causes great confusion and gives a bias to a certain area in the Parish.</p>	<p>The size of the sites in the report have been calculated from OS based mapping systems.</p> <p>Comments noted. A decision was taken by the Parish Council that the Tillington area was identified as the area around the Tillington Business Park, where the few services in the settlement were located, and a settlement boundary was identified around this as a settlement.</p> <p>The area north west of Tillington, around the Common was not included in the identification of the settlement, in a similar way to St Mary's not being identified as within the Hereford or Burghill settlement boundary, due to the distance from services.</p> <p>Comments have been received from Savills in relation to the site assessment report.</p> <p>This is a decision for the Parish Council.</p> <p>Scores will be converted to a percentage to ensure consistency.</p>	

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		<p>Constraints have been applied to a site as a whole. Some larger sites may only be constrained for a small element however the constraints have been applied to the full site.</p> <p>We must be mindful that certain Landowners are providing information that is incorrect or ambiguous to support their application. I trust that the Parish Council and Steering Group are wise enough to realise the Landowner, in many cases may be bending the truth or worse. So, when information is being presented in a report or in way that is ambiguous or carries clauses, the PC and SG have a duty to investigate that these reports contain accurate information and that legal clauses are presented in full and checked by a legal representative. I can assure you that if you aren't other individuals will be.</p> <p>I can give input on Site 2B that highlights inaccuracies in Kirkwells scoring again, however, because the USAR document is not valid there is no point at this time. I will be happy to comment on sites once a valid USAR is presented and all the Parish are aware of ALL facts.</p> <p>Finally, I would confirm that I have been monitoring the Planning Applications and working with figures presented in the previous draft NDP and feel that we have reached our 18%target. I have had these figures independently checked and am getting these verified again at the moment. If it is the case that we can achieve the 18% from sites with permission along with an acceptable number of windfalls (my figures are based on windfalls already listed in the previous NDP less those that now have permission) the Parish Council have to acknowledge that this is the sensible way forward. It's the only way to prevent a legal challenge.</p>	<p>Comments noted. Should the Parish have concrete evidence to dispute the information provided by landowners, this should form part of the evidence base for the selection of the sites to go forward from this point into the Neighbourhood Plan. The site assessment report is a desk top evaluation based on the information provided.</p> <p>Up to date figures received from Herefordshire Council have been included in the final site assessment report.</p>	
32-1	Neil Christie	<p>The "Recent News" article in May's Parish Magazine has invited comment on the above - by the end of June "if possible", it is unclear if that is a deadline or a request for administrative convenience.</p> <p>I have been unable to find the original Site Assessment Report on the website so cannot make direct comparisons, and confine my remarks to one or two sites.</p>	<p>Comments noted</p> <p>At the time the site assessment report was written, the decision had</p>	No change

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		<p>The USAR appears to ignore/reject site for 50 houses on “land between Tillington Road and Roman Road” yet it is currently being openly marketed for sale to developers!!</p> <p>There are glaring inaccuracies in the document, e.g. Site 1C (land between Haymeadow Farm and Home Farm Burghill) “utilities would be required” - but the Welsh Water map shows the main sewer crossing the site</p> <p>Site 1C “site is 560m from bus route” - but the bus travels alongside the site!! “Bus stops at Leasown” - but it also stops 100 yards away by Burghill Manor (I have used it countless times)!!</p> <p>Site 10 (Tillington Business Park) - described as Brownfield, yet over three quarters of it is in fact s52 Greenfield.</p> <p>Site 10 is advocated yet it also requires utilities - and does not have the benefit of an undisclosed main sewer.</p> <p>There are subjective judgements applied inconsistently, e.g. Site 1C is rejected as “site would impact on views..... inappropriate extension of the village” yet Site 10 is advocated “would not impact on views” - but it is blindingly obvious that it should fail the same judgement, being on high ground and also a massively disproportionate increase in housing density in the immediate area, to the extent of creating a new settlement.</p> <p>It is to be noted that the USAR introduces further scoring including “proximity to Conservation Area” - this is an immediate bias away from Burghill, yet Burghill is the principal settlement area. The USAR is a shambles of inaccuracy and misrepresentation, it is misleading and should be rejected as not fit for purpose.</p>	<p>not been issued on the Tillington Road/Roman Road site. This has now been amended as the decision has now been issued.</p> <p>Whilst there is a main sewer crossing the site, it would still require significant costs to access it.</p> <p>Information taken from Herefordshire Bus information websites. Bus stop at Burghill Manor not shown on maps</p> <p>See comments to 14-2 above</p> <p>Site assessment indicates utilities would be required to service the site.</p> <p>Comments noted.</p> <p>Scores will be converted to a percentage to ensure consistency.</p>	
32-2	Neil Christie	<p>The 2014 Questionnaire established that a mere 2% of residents considered growth in excess of 18% (126 houses) would be acceptable over the period to 2031.</p> <p>This growth number has now in fact been met already by existing approvals and windfalls.</p>	Comments noted. See 3 above	No change

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		<p>Why is the Parish Council advocating a revised NDP with additional development? The Parish Council is rejecting the expressed interests of the residents in favour of those of prospective developers, and preserving a NDP simply because its creators “have put so much work in” The NDP and the Parish Council must represent the interests of the whole Parish, and the Council Members should remind themselves of that.</p>		
32-3	Neil Christie	<p>“Recent News” in the May 2017 Parish Magazine presents the reason for Herefordshire Council not progressing the NDP as “concerns of deliverability”. This is a blatant half-truth as lack of consultation was also cited at length by Herefordshire Council. Why are residents being given misleading/selective information? The most recent NDP Steering Group Agenda published on the website is 30 November.</p> <p>The original Site Assessment Report is not identified on the NDP page of the website. The Conclusion of Herefordshire Council's response to the NDP is not published directly, I had to read to page 19 of “Progress to Examination Decision Document” on the website to find it - which surely a material number of residents do not or cannot access - yet this is a fundamental document in the NDP process. The Parish Magazine article invites residents to comment on the Updated Site Assessment Report but offers no guidance - either in the magazine (delivered to all) on the website (accessed by few) - as to what they should be commenting on or considering. The USAR itself is a mass of selective judgements, inconsistencies and inaccuracies. Obfuscation, half-truths and lack of information makes it impossible for residents to make meaningful judgements and comments. Either this is deliberate policy or it is incompetence.</p> <p>Attempts by residents to engage in person at Parish Council meetings have been met with disdain and rudeness. After residing in the Parish for thirty years I foolishly considered offering to become active in the administration of the community and attended a couple of Parish Meetings with that in mind.</p>	Comments noted	No change

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33-1	Bob Yeomans	<p>I have recently had an unsigned document (which is attached) put through my letter box which states that the parish has already reached its allocation of 18% increase in housing without the sites identified by the NDP.</p> <p>My questions are:</p> <ol style="list-style-type: none"> 1. Is this true, and if so why are we offering up more sites? 2. If we offer more than the required number, will they be deemed to have "planning permission" and be taken for development as well. 	Comments noted. See response to 3 above	No change
33-2	Bob Yeomans further comments	<p>Many thanks for your response. I have seen the documents mentioned on the web site, and after consultation my comments are as follows:</p> <ol style="list-style-type: none"> 1. The consultant's report stated that we required a further 25 sites to meet our allocation of 18% increase in housing for the parish, and in studying the current rate of planning applications one would suspect we would meet that by the end of the period in question without any further allocations at all. 2. The consultants have identified sites for a further 60 houses, of which I presume the council will only put 25 forward. If all three sites for 60 houses are put forward, is there a chance of the Hereford council taking them all and exceeding our quota. 3. I understand the scoring criteria used, but the Tillington sites do have problems with a lack of mains services and the position of their access points onto a main road which has already had a previous planning refusal for an access point for an existing site. 	The USAR forms part of the process of site allocation. It gives a desktop evaluation of sites. It is for the Parish Council to use this information together with identified and justified local knowledge to select the sites for allocation in the Neighbourhood Plan to go forward for submission.	No change
34-1	Russell Hoddell	<p>I am forwarding my a pdf (5pages) of objections/comments to the Burghill NDP USAR directly to you as I cannot be sure that you will receive it via the Burghill Parish Council as a complete document if at all. Past experience at Regulation 14 has shown that redacting takes place with a total lack of transparency where all consultation with the community has been ignored and stifled.</p> <p>If you do receive my comments from the BPC I would be grateful if you would forward it to me if any redaction has occurred.</p>	Comments noted	No change
34-2	Russell Hoddell	<p>It is apparent Burghill Parish Council has no intention of following proper procedures and meet Basic Conditions instead continuing to choose to ignore every concern, objection or comment made by members of this community at Parish Council meetings, one to one discussions, emails, comments at Regulation 14 & 16. Sadly, I do not detect there will be any change</p>	Comments noted	Amend accordingly

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		<p>Let's make no mistake: the Burghill NDP FAILED at Regulation 16. Herefordshire Council cited deliverability & the lack of consultation. Now when you consider that the majority of NDPs submitted by other parishes have passed, especially when they have been led by amateurs, it is astounding the level on incompetence shown during this process by those organising the Burghill NDP.</p> <p>As with every stage of this process since the Options Day in 2014 there has been no consultation with the community, the plan so far the sole product of the Chairman of the Steering Group and a couple of others on that SG. The Parish Council simply have never engaged in the process, the majority ignorant, leaving it to the Chairman of the SG to direct them what to do. As a Parish Council they continue to abrogate their responsibility and have been negligent in their responsibility to this community. It is both appalling and shocking.</p> <p>Even recently, there was a misrepresentation by the Chairman of The SG at Burghill PC meeting 14th June who stated, "We decided to re-assess every single site, which Kirkwells have done." This is patently untrue where in fact they have not, many sites not being assessed at all and never were.</p> <p>Also, now that any Site included in the plan will receive Planning Permission in Principle they will come under even greater scrutiny therefore this shallow assessment of sites is completely inappropriate and as the Chairman of the SG stated himself, "This USAR is no longer robust". This has yet again been an expensive waste of time at the taxpayers' expense.</p> <p>To begin with there is a fundamental problem with this report: The scoring used in this report is something a schoolboy would use because it is not weighted. The effect of not weighting is that the absolutely crucial effect of a site with a terrible access which is highly constrained, slips through without those terminal constraints being sufficiently taken into account. This is basic important stuff that should have been used and fundamental to producing a report with any integrity and something that will deliver real viable sites that</p>	<p>The Neighbourhood Plan did not proceed to examination due to concerns with the deliverability of some sites. Herefordshire Council are satisfied that the original Regulation 14 consultation was carried out in accordance with the Neighbourhood Planning Regulations.</p> <p>Sites in open countryside are not assessed in the site assessment report due to their location.</p> <p>The USAR forms part of the process of site allocation. It gives a desktop evaluation of sites. It is for the Parish Council to use this information together with identified and justified local knowledge to select the sites for allocation in the Neighbourhood Plan to go forward for submission.</p>	

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		<p>could be developed. For example if you take Site 12 which is in someone's back garden at Redstone and scores favourably with a total of 4 but it has no access and it is constrained so it is useless. Then the big sites adjacent to the established settlement boundary at Burghill have poor total scores of 9.25 and 12.25 partly because some of the scores have deliberately been increased to prevent their selection - they are adjacent to services etc so should not get a "1", they only need connection, like Pyefinch did! The access to Sites 25 & 22 will never achieve visibility splays so weighted scores would take these sites out because they are undeliverable. Site 10 is landlocked and has no access and a weighted scoring would mark this as undeliverable too. The same can be said of infrastructure for these 3 sites, 10, 25 & 22. There is none and they are in open countryside so are undeliverable.</p> <p>Continuing with this, it is particularly idiotic because (for example) only half of Site 34 West of the church is within the conservation area, but it is all rated as if it were all in it. Then the other large sites in Burghill, in particular the Duchy of Cornwall's sites 1A and 1C both get rated for Archaeological HER (Historic Environment Record) site, although they are not within 1A, and the small part of an HER in 1C (a large site) is easily avoided. Also 1C is rated as "Utilities required to service site" yet there is a sewer which runs right across it, the Chairman of the SG knowing this. All this is very worrying and unprofessional.</p> <p>Therefore I am only making limited comments here about the USAR because the process and this document is so flawed and biased, and because of past experience where there will be no material changes or any voice listened to before the plan is resubmitted at Regulation 16. I will wait until Regulation 16 and rely on Herefordshire Council to continue to show integrity and professionalism, counting on them to shoot this plan down yet again because proper procedures enshrined in law have not been followed.</p> <p>It is inexcusable just to place the USAR on the Burghill Parish Council website, then place a few announcements in the Parish magazine informing parishioners they can comment. Put aside the fact as stated by one Parish Councillor that "no one ever reads the magazine they just put it in the bin", an indication of actually how</p>	<p>Site 12 has access either through the existing dwelling or from the garage site to the rear. Comments noted. The site assessment report has scored the sites in an open and transparent way.</p> <p>The sewer is a main sewer and will require diversion or easements either side.</p> <p>Neighbourhood Planning Regulations have been followed throughout the process.</p> <p>Comments noted. The Site Assessment Report is part of the overall process that has included</p>	

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		<p>many parishioners even know about the USAR's existence, just to place it on the website serves no one, except those that want no consultation. This report is rendered meaningless when there is no explanation, no context and no guidance. That is not consultation.</p> <p>This is symptomatic of the entire process since October 2014. Still the Burghill PC refuse to listen and simply are unable to understand how a process like this should be performed. They have proved themselves incapable at the last Regulation 14 and 16 and they continue to do so. Simply they will not listen.</p> <p>So what follows are only brief comments on the USAR in concern to the Tillington sites. There is no point even commenting on others as I will not waste my time further and comment on sites in Burghill where there are many viable sites that are being deliberately ignored in favour of 3 Tillington sites.</p> <p>1. You state, "Tillington Common is not identified as a sustainable settlement by Herefordshire Council in the Core Strategy and therefore, there will be no allocations in Tillington Common, and as such the sites will not be re-assessed." This is completely false and is deliberate. There is only Tillington. The sign for Tillington appears to the West of Tillington Common on entering the village. Tillington Common is not a separate entity or some satellite of Tillington. This has been done to deliberately and disingenuously bring focus to other sites immediately surrounding and including Tillington Business Park. Tillington Common is just that "a common", it is not a place, therefore all the sites including those on the West side of Tillington where there are 40 houses in a tight cluster should also have been re-assessed. This deliberate obfuscation has happened throughout this process and done to facilitate the targeting of certain areas within Tillington. It leaves the Burghill NDP without any integrity and this USAR demonstrates this continuing and appalling bias with untrue and misleading statements.</p> <p>2. Your statement that Planning Permissions are 25 dwellings short of the requirement is factually incorrect and demonstrates bias. The actual total is sufficient to meet more than the 18% which can be proven. Here is just one example you stated, "Site 30 - Former Pig Farm, Tillington Common Open Countryside, not identified as a</p>	<p>several consultations with the community.</p> <p>Comments noted. A decision was taken by the Parish Council that the Tillington area was identified as the area around the Tillington Business Park, where the few services in the settlement were located, and a settlement boundary was identified around this as a settlement.</p> <p>The area north west of Tillington, around the Common was not included in the identification of the settlement, in a similar way to St Mary's not being identified as within the Hereford or Burghill settlement boundary, due to the distance from services.</p> <p>Comments noted. The 18% target for Burghill Parish is identified through the Herefordshire Local Plan</p>	

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		<p>sustainable settlement in Herefordshire Core Strategy.” If that is so why has it received planning permission for two dwellings? And of course that figure then being counted towards the total?</p> <p>3. A Settlement Boundary for Tillington does not exist and the fictitious boundary drawn in the Burghill NDP having never been consulted on and therefore is the affectation of the mind who drew it and therefore should never be referred to or included in the scoring for Tillington.</p> <p>4. The sleight of hand to increase the scores for Burghill and therefore make them less viable is astounding. By including Heritage Assets and Conservation Area only for Burghill puts them at an advantage and therefore like for like is not being measured. The nature of this unfair scoring in effect protects Burghill from development.</p> <p>5. Proper assessment of access viability once again has been deliberately ignored.</p> <p>6. Two of the most important factors regarding deliverability: sewerage and drainage have also again been ignored and will be a critical criteria for PPIP.</p> <p>7. Site 10 is Greenfield and open countryside wedged between two industrial units and a BAP site without an access and no drainage or sewerage with severe flooding issues on the south and north side and further down Crowmore Lane - it is completely undeliverable. Yet your report constantly refers to this business park as the centre of some settlement you have constructed to promote your bias.</p> <p>8. Misleading language included to favour Site 10, "The site is located centrally in the Tillington settlement". There is no settlement nor is there a settlement boundary this site located on the edge of Tillington the boundary only 20 metres away.</p>	<p>Core Strategy amounting to a minimum target of 124 dwellings. To date planning commitments total 106 dwellings resulting in a balance of 18 dwellings. In order to be in general conformity with the Local Plan Core Strategy, the NDP should identify the target number of dwellings to come forward in the plan period.</p> <p>Site 30 was assessed against Herefordshire’s countryside policy (RA3) as a conversion.</p> <p>Scores will be converted to percentages to ensure consistency</p> <p>Both points 5 and 6 have been included in site assessment</p> <p>The site was scored in the updated site assessment report as Greenfield. However, based on information provided in 14-2 above it will be amended and scored part brownfield/part greenfield.</p> <p>See comments re: settlement boundary above</p>	

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		<p>9. And contrary to the above (7), unsurprisingly you state about Site 13, "Site is predominantly located in open countryside, located on the edge of the settlement." when it is almost opposite Site 10 that you state is central to the settlement.</p> <p>10. And again you state about Site 22, "The site is located centrally in the Tillington settlement." Completely untrue. There is a field opposite, The Bell to the West, and a house on Site 10 to the East. There is no settlement only sporadic housing. The terminology used is a disgrace and indicates complete bias in this document.</p> <p>11. And again, to emphasis your bias for the Business Park and against other sites you state in regard to Site 29, "this is separated from the central area around the Business Park and shop". It is factually untrue and is a disgrace that it has been included.</p> <p>12. In addition to this regarding Site 29, you state, "Considerably divorced from the area around Tillington Business Park" Your bias in language to favour Tillington Business Park and exclude other sites is reprehensible and deliberate. Who has promoted this bias?</p> <p>13. And again referring to Site 29, "Site is predominantly located in open countryside, located on the edge of the settlement. Settlement of Tillington appears to be between Crowmoor Lane and C1099." Appears? On whose authority? A falsely misleading statement when if anything it is closer to more housing (Round Oak and beyond & along the Credenhill Road) than your misleading claim about the central area around the Business Park. This is quite shocking. If there is a centre at all it would be the 40 houses in a tight cluster around Tillington Common that you conveniently never mention. Let me remind you that Tillington and Tillington Common are all Tillington and all in open countryside. Again bias.</p> <p>14. Again bias being demonstrated towards Site 10 when you state about Site 29, "...the position of the access would be significantly separated from the central area of Tillington around the Business Park."</p> <p>15. Again with Site 25, "Site is located between the dwellings on Cherry Orchard and Tillington Business Park." Untrue and</p>	<p>Site 13 is to the east of the main built up area.</p> <p>Site is centrally located adjacent to business area and pub and within the settlement boundary identified by the parish council</p> <p>Comments noted. Disagree</p> <p>Sites are assessed against area identified by parish council as Tillington.</p> <p>Sites are assessed against area identified by parish council as Tillington.</p>	

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		<p>demonstrates your bias again. In fact the main Tillington road separates it from the Business Park and the actual frontage faces the field opposite put forward as Site 22, both open countryside.</p> <p>16. You state about Site 22, "Whilst surface water flooding has been raised as an issue, from information provided on the Environment Agency website, there are no surface water issues on the site but there are high risk areas 840 metres to the south of the site on Crowmoor Lane." If you had talked to The Bell's landlord he would have told you flooding occurs in his cellar due to the sloping topography of this site. In addition to this flooding occurs at Whitmore Cross crossroads and further severe flooding to the North and South of these sites in Crowmore Lane. Further you state about Site 22, "Site would not impact on views from outside the village." How do you wrongly determine this when the houses would line the Tillington Road? There would be a detrimental impact the houses completely visible. Then if you include the houses from Site 25, it would be like passing through a mini housing estate and completely inappropriate for this area that is open countryside with sporadic housing.</p> <p>17. Also combined with this, Site 10 is elevated so would also impact on views contrary to what you state.</p> <p>18. The owner of Site 10 was reported to the Environment Agency for burning vast quantities of sump oil with drifting 50' clouds of dense acrid black smoke drifting over his land and onto the neighbouring land put forward as Site 22 and where the housing is being proposed to be built and therefore is contaminated.</p> <p>19. Flooding around Site 10 occurs on the south and north sides too with further considerable flooding further down Crowmore lane that Site 10 will aggravate. There is also flooding on Whitmore Cross crossroads directly in front of Site 10. Excessive quantities of the housing proposed will create massive areas of hard standing that will exacerbate this flooding in all directions.</p> <p>20. A Section 52 Agreement applies to the greenfield section of Site 10 that has been proposed for housing and the BAP which does not allow any development of the land, therefore a considerable constraint. Conveniently ignored.</p>	<p>Sites are assessed against area identified by parish council as Tillington</p> <p>Whilst there is localised flooding, this is not identified by the Environment Agency. The USAR forms part of the process of site allocation. It gives a desktop evaluation of sites. It is for the Parish Council to use this information together with identified and justified local knowledge to select the sites for allocation in the Neighbourhood Plan to go forward for submission.</p> <p>No contamination is recorded at the site.</p> <p>Comments noted</p> <p>The Section 52 agreement prevents the storage of motor vehicle parts on</p>	

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		<p>21. You stated about Site 21, "Factors affecting deliverability are possible contamination due to past use and the creation of access including necessary visibility splays." And no mention of the same issues for Sites 10, 22, & 25 all situated on one of the most dangerous sections of road and on a slopping dog-leg where visibility splays will never be achieved and where a new access to Site 10 was formally denied planning permission recently. Demonstrates yet more bias and the lack of proper detailed assessment that will need to occur to achieve PPIP. There is no access to Site 10 and splays could never be achieved. Visibility splays could never be achieved to Site 25. Visibility splays could never be achieved for Site 10. Visibility splays could never be achieved for Site 22.</p> <p>22. Site 25 floods to the south that runs into the housing in Cherry Orchard.</p> <p>23. You state about Site 41, "...Would require significant removal of hedgerows, having an effect on rural character of the area." This could be applied to Site 25 and Site 22 where considerable protected ancient hedgerows would have to be removed. Bias again.</p> <p>24. You also state about Site 41, "Site is predominantly located in open countryside, away from the Business Park area." Yet again you peddle this idea that Tillington Business Park should be the centre of all housing. This bias is a disgrace and one wonders why you are propagating this idea and for whom.</p> <p>25. Then, you further state about Site 41, "Site would represent inappropriate extension of village westwards." The entire village runs for a mile West of Tillington Business Park. Opposite this site is Round Oaks and further housing lining the Tillington Road going West.</p>	<p>an area of the land in Site 10. S52 Agreements may be varied or discharged by agreement under deed with the local planning authority and any other party to the original document.</p> <p>Contamination in relation to this site is due to its use as an orchard as identified by Herefordshire's Environmental Health.</p> <p>Comments noted. Site scored accordingly</p> <p>Comments noted</p> <p>Comments noted. Site 25 will result in part of hedgerow removed to facilitate widening of Cherry Orchard. Site 22. Site 25 will result in significant removal of hedgerows to facilitate visibility splays.</p> <p>See comments re: settlement boundary above.</p>	<p>Amended accordingly</p>

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		<p>26. Then again about Site 41, "Site would impact on views of the village." Once again Sites 10, 25 & 22 would also impact on views. Bias against this site to favour others in Tillington.</p> <p>27. 30dph or your indicted 12dph does not take into account the local characteristics and the actual dph for this area are drastically lower therefore a housing estate like this is totally disproportionate. That combined with Site 25 and Site 22 would amount to a housing estate situated in open countryside with a dph more suitable to Bobblestock than Tillington. It is ludicrous and totally disproportionate and only demonstrates that not one single material change was ever adopted from the numerous objections made at Reg 14 and 16. This whole exercise is a waste of money (£1400 for the USAR, and £25,000 in total) and a farce.</p> <p>It is obvious by the phrasing and terminology used that this report has been written in favour of Site 10 in particular. This bias is shocking and one does have to wonder the reasoning for it. This USAR is an example of the terrible incompetence shown throughout this process. As "independent professional consultants" it is deplorable the misleading and biased statements contained within it.</p> <p>But it doesn't surprise me and is only a continuation of how the Burghill NDP has been operated. With proper procedures simply never being followed and with no community involvement or consultation, this report will only add weight to the NDP easily failing for a second time at Regulation 16.</p>	<p>Comments noted</p> <p>The 12 dwellings per hectare density is based on the number of dwellings in the area comprising the proposed settlement boundary.</p> <p>The site assessment report has been carried out in a clear and transparent way. The USAR forms part of the process of site allocation. It gives a desktop evaluation of sites. It is for the Parish Council to use this information together with identified and justified local knowledge to select the sites for allocation in the Neighbourhood Plan to go forward for submission.</p>	
35-1	Sandra King	<p>I attach my comments on the Updated Site Assessment Report. Please acknowledge receipt, and confirm that the comments will be passed in their entirety to Kirkwells.</p> <p>I will also be forwarding these comments myself directly to Kirkwells because I have no confidence that they will otherwise receive them. Some of my comments at Regulation 14 were arbitrarily deleted, so I wish Kirkwells to receive these comments on the USAR without deletions.</p> <p>I am going to ask Kirkwells, should attempts be made to redact or suppress my comments by anyone, for Kirkwells to inform me, explaining to me the supposed grounds for such exclusion BEFORE such comments are redacted or suppressed, so that I can take whatever action I deem appropriate, which may include legal action.</p>	Comments noted	No change

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35-2	Sandra King attachment	<p>I make comments which each relate to numbered paragraphs in the USAR:</p> <p>1.0 Background</p> <p>1.3 (Options Days) Very few preferences were expressed, and there was no record published of where residents who expressed preferences came from. Were they being NIMBYs?</p> <p>1.4 (Sept 2015 Site Assessment Report) This was produced in Sept 2015 but not published until after the Regulation 14 'consultation' had started in 2016, as a result of Herefordshire Council requesting its publication following concerns raised by a landowner. Consequently, it was not the "open and transparent consultation with the community" as expected by Herefordshire Council in Guidance Note 21.</p> <p>1.5 (Openness, Transparency and Engagement) You (Kirkwells) refer to Guidance Note 21 but have not followed the advice within that guidance to conduct the process "in an open and transparent way", including "consultation with the community". I appreciate that Kirkwells has been instructed by Burghill Parish Council in this USAR process and is doing what it has been paid (or even specifically directed) to do, by less competent people who are clearly not professional planners. However, the last face-to-face consultation in which the community was actively engaged, was in November 2014.</p> <p>Since then, the community has been presented with rare snippets of generalised information in the form of bulletins in the Parish Magazine, and some lengthy Draft documents online. Neither of these encourages active involvement. This USAR is just another report which will unfortunately receive little public comment because there has not been adequate effort made to engage with parishioners as per national planning practice guidance. When parishioners have tried to be involved, their comments have been ignored, ridiculed, or rudely rejected.</p> <p>1.6 (Tillington Settlement Boundary) Parishioners have never been asked about a proposed Settlement Boundary for Tillington. You claim to have considered Regulation 14 & 16 comments about a Tillington Settlement Boundary, but clearly you have not understood them. At no time have residents of Tillington (by that I mean the</p>	<p>Comments noted. No requirement to record where residents lived in the parish.</p> <p>As an evidence document, the site assessment report was published during the Regulation 14 consultation to give background to the site allocations.</p> <p>Site assessment has been carried out in a clear and transparent way.</p> <p>A number of consultations have taken place as part of the Neighbourhood Plan Process, including the initial Options Days consultations, the Regulation 14 consultation, the Regulation 16 consultation and this consultation on the Site Assessment reports.</p> <p>Comments noted. A decision was taken by the Parish Council that the Tillington area was identified as the area around the Tillington Business Park, where the few services in the</p>	Amend accordingly

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		<p>whole of Tillington including the northwestern part near the common) been involved in deciding whether or where development should go in Tillington. Kirkwells have clearly decided unilaterally (or been instructed by the “Parish Council”) that “Tillington Business Park” is the main focal point for ‘Tillington’ (i.e. the few houses and separate hamlets which make up the Tillington area), without asking residents, and this is repeatedly mentioned in the USAR. That unilateral decision has been used to guide what you now define as “the built form”. Therefore what should or should not constitute the built form for Tillington has also not been consulted on. The focal point which (presumably) “you” have chosen for “the main focus of proportionate housing development” in Tillington actually comprises a few ugly metal clad sheds in a so-called “Business Park”. This is akin to defining the scruffy Beech Business Park in north Hereford as the focal point of Hereford.</p> <p>2.0 Housing Required in Neighbourhood Plan Area 2.3 (Tillington Common) It has never been clear which part of Tillington was identified by Herefordshire Council as being a “Figure 4.14” main growth settlement in its Core Strategy. Herefordshire Council said when asked by “Burghill Parish Council” that the parish could identify where it wanted development to be. Residents of Tillington, all parts of Tillington, should have been making these decisions. (Not the Parish Council which only has 3 members who were elected 17 years ago and 12 non-elected members who have no democratic mandate). Sites/buildings which were submitted at the northwest end of Tillington, near the common, are not being reassessed by you because of the claim that they are in ‘open countryside’. The USAR says that Herefordshire Council does not identify Tillington Common as a sustainable settlement. Untrue. The Rural Housing Background Paper March 2013 used Tillington Common as the basis for defining Tillington as a supposedly sustainable settlement. In the end, it should be the residents of Tillington – not the unelected 80% of members of the Parish Council, nor the unelected members of the Steering Group, nor Kirkwells of Burnley – who decide which parts of Tillington should have development or not.</p> <p>(Lower Burlton) Lower Burlton is not defined as a sustainable settlement nor as a settlement which will be the main focus of</p>	<p>settlement were located, and a settlement boundary was identified around this as a settlement.</p> <p>This was consulted on at Regulation 14, and whilst there a huge number of comments from a small number of residents at this stage, it was considered that the appropriate way forward was to include the settlement boundary for Tillington in its proposed location.</p> <p>The area north west of Tillington, around the Common was not included in the identification of the settlement, in a similar way to St Mary’s not being identified as within the Hereford or Burghill settlement boundary, due to the distance from services.</p> <p>Whilst Tillington Common has a number of houses it is significantly separated from the facilities and services in Tillington and Burghill to be identified as open countryside.</p>	

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		<p>proportionate housing development by Herefordshire Council in the Core Strategy, yet in the USAR, sites at Lower Burlton have been reassessed. This is entirely inconsistent.</p> <p>2.5 (Table 1 Planning Commitments) Table 1 is not up to date, there have been recent planning permissions which it does not include and which when added to those in Table 1, and with the addition of a windfall allowance, equal the minimum 18% growth required of the Parish by Herefordshire Council. 98% of respondents to the Questionnaire in 2014 wanted 18% growth or (considerably) less. Adding more houses to the 18% is completely disrespectful of parishioners' expressed wishes.</p> <p>3.0 Methodology</p> <p>3.1 (Sustainable locations) The Core Strategy does not identify Lower Burlton as a sustainable location. Fact. The Core Strategy does not identify where in Tillington sustainable development might be placed. Fact. Tillington Common was the settlement identified as sustainable in the Rural Housing Background Paper March 2013. Fact. Parishioners in Tillington and Lower Burlton have not been properly consulted on these matters. Fact. Decisions have been made on a whim by others. Fact.</p> <p>3.2 (Reassessment) Parishioners have no way of knowing if their comments at Regulation 14 & 16 have been taken into account at all, contrary to the National Guidance, which states that the preparation of a neighbourhood plan should be inclusive and open and ensure that the wider community is made aware of how their views have informed the draft neighbourhood plan. The Regulation 14 comments did not influence the Regulation 16 Draft in any obvious way. It was materially unchanged. You at Kirkwells as professional planning consultants probably did not even see all the Regulation 14 comments as it is clear from the Consultation Statement that many of them were arbitrarily redacted.</p> <p>3.5 (Relevant sites) Who decided what is relevant? Were you told by the Chairman of the Steering Group which sites to visit? Surely it can't have been the Parish Council (qualifying body) which instructed you because they are disengaged from the whole process? Because the wider community has not been involved in the selection of what is</p>	<p>Lower Burlton is identified due to its proximity to the Hereford City boundary.</p> <p>Comments noted. This has been updated to reflect the present position.</p> <p>Lower Burlton is identified due to its proximity to the Hereford City boundary.</p> <p>See comments re: Tillington Common above.</p> <p>The Consultation Statement was prepared by Kirkwells on behalf of the Parish Council. All comments were received in full and a decision was taken to remove those that were defamatory, derogatory, of a personal nature against a member of the PC or Steering Group and alleging criminal acts</p> <p>The sites that were not identified as open countryside we re-visited as part of this process.</p>	

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		<p>relevant for reassessment, one naturally assumes that Kirkwells has acted under instruction from someone.</p> <p>(Suitability & Deliverability)</p> <ul style="list-style-type: none"> · If a site floods, what is the point of giving it a score of 1, you might as well give it a score of 100, you just wouldn't build there? · Similarly if a site is "totally inappropriate", what is the point of giving it a score of 1, you might as well give it a score of 100, you just wouldn't build there? · Similarly if a site is "constraints cannot be overcome", what is the point of giving it a score of 1, you might as well give it a score of 100, you just wouldn't build there? · Similarly if a site is not in immediate proximity to the sewage infrastructure, why is it being treated as though it is? The costs of extending the mains sewage network will be huge, and in the rush to place housing in locations which benefit owners of land, those costs have been totally disregarded, therefore deliverability is again questionable. · Similarly if a site is unable to have connection to the mains sewage network, there will be negative environmental impacts from septic tank waste water discharges locally and into the river catchments, again totally disregarded. <ul style="list-style-type: none"> · In many cases the scoring is plainly wrong, presumably due to lack of consultation with local people who do understand local constraints. · How can sites be considered if their physical access is inadequate, or visibility splays cannot be made and therefore the site is undeliverable on grounds of highway safety? · Site 10 has a Section 52 Agreement on it which has been disregarded and not even noted in your assessments or scored. · The Scoring is such that sites in different locations cannot be compared, because many Burghill sites are scored out of 15, whereas the rest are scored out of 13. Not only does this make them incomparable, it also introduces bias so that many Burghill sites appear to be less favourable for development because of their scoring · Consequently it is not sufficient just to add up scores, the criteria should be weighted so that the overall score is balanced and meaningful. 	<p>The sites were scored according to information and evidence available from public sources.</p> <p>The Section 52 agreement prevents the storage of motor vehicle parts on an area of the land in Site 10. S52 Agreements may be varied or discharged by agreement under deed with the local planning authority and any other party to the original document.</p>	


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		<p>My Conclusion This is a top-down report which does not engage the local community. It does not follow Herefordshire Council's advice in Herefordshire Council's Guidance Note 12 to "tap into local knowledge" or give the community "a sense of ownership". In many cases it has not even consulted with landowners to understand their intentions for their sites. I am sorry to say that it is also an unnecessary report, as the total of completions, commitments and windfalls meets the 18% target anyway. That said, I suspect that Kirkwells may have been hampered in their ability to prepare the report freely in the way that a professional, independent consultant might have done.</p> <p>Should Kirkwells consider distancing themselves from this particular NDP, because the maintenance of integrity is everything, from both a business and an ethical point of view?</p>	<p>Scores will be converted to percentages to ensure consistency.</p> <p>The site assessment has been carried out in a clear and transparent way in accordance with the Herefordshire Councils guidance note.</p>	
36-1	David King	<p>I attach my comments on the Updated Site Assessment Report. Please acknowledge receipt, and confirm that the comments will be passed in their entirety to Kirkwells.</p> <p>I will also be forwarding these comments myself directly to Kirkwells because I have no confidence that they will otherwise receive them. Some of my comments at Regulation 14 were arbitrarily deleted, so I wish Kirkwells to receive these comments on the USAR without deletions.</p> <p>I am going to ask Kirkwells, should attempts be made to redact or suppress my comments by anyone, for Kirkwells to inform me, explaining to me the supposed grounds for such exclusion BEFORE such comments are redacted or suppressed, so that I can take whatever action I deem appropriate, which may include legal action.</p>	Comments noted	No change
36.2	David King attachment	<p>I am therefore submitting my comments to the Parish Clerk but also directly to Kirkwells. In particular, I am copying Kirkwells directly, because the Chairman of the NDP Steering Group was recorded saying at the June Parish Council Meeting "the comments which do come in will be sent as a point of information to Kirkwells, so that they can note their presence". From this utterance, any reasonable person would conclude that the Chairman of the NDP Steering Group is determining that comments from some people will receive little or lesser weight, because they will be treated as "a point of information" rather than as representations from the public. I am fully entitled – especially as I know more about this Neighbourhood Plan than most</p>	<p>Comments noted. All comments both at Regulation 14 and during this consultation have been received by Kirkwells in full.</p> <p>The Consultation Statement for submission was prepared by Kirkwells on behalf of the Parish Council. All comments were received in full and a decision was taken to remove those that were</p>	Amend accordingly

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		<p>people (who unfortunately have just not been adequately engaged in this distant and non-inclusive process) – to make my entirely valid comments. My comments at Regulation 14 Stage were not treated seriously, and were casually rebutted. The analysis of comments from the Regulation 14 Stage which eventually emerged in the (so-called) Consultation Statement at the Regulation 16 Stage was nigh on impossible to decipher; many comments had been redacted out-of-hand; and therefore it immediately failed a Basic Conditions test that a qualifying body should be inclusive and open in the preparation of its neighbourhood plan and ensure that the wider community is made properly aware of how their views have informed the draft neighbourhood plan. In view of this, I have a low expectation, and I fully expect that any comments on the USAR which are “not liked” by the Chairman of the Steering Group will be rubbished or ignored.</p> <p>I am familiar with the Nolan Principles. The behaviour of certain individuals on the Parish Council and the Steering Group has been quite appalling. Parishioners have been treated with disrespect and patronised. The adopted Parish Council Code of Conduct has been breached. I note also that RTPI members are subject to a Professional Code of Conduct. I am sure that RTPI members within Kirkwells adhere to it diligently. However there are others from within Burghill Parish who claim to be RTPI members who have treated my wife and other parishioners, in public, in front of witnesses, with unbelievable discourtesy, disrespect and rudeness. That is unforgiveable.</p> <p>However, I fully expect that the comments in the above first two paragraphs will be ignored on some specious grounds that they are not relevant, despite their importance in providing context.</p> <p>With regard to the USAR:</p> <p>1. There has been no publicly accessible copy of the previous September 2015 Site Assessment Report for many months. It certainly has not been on the PC website since the USAR was put on there. My point is, how can parishioners be properly informed, if they are presented with an updated USAR but are unable to compare it with the previous one? No doubt the earlier one will now miraculously reappear. I have made certain that an archived page copy exists to show that the Sept 2015 SAR was not on the PC website as at when</p>	<p>defamatory, derogatory, of a personal nature against a member of the PC or Steering Group and alleging criminal acts as will be in this document.</p> <p>A difference of opinion does not entitle a person to submit derogatory or defamatory comments. The redaction of such comments does not impact on the Basic Conditions.</p> <p>Comments noted. The original Site Assessment Report was completing re-assessed as part of this update and is therefore no longer required as part of the evidence base.</p>	

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		<p>these comments were written – i.e. 4 days before this USAR ‘consultation’ was due to end.</p> <p>2. It is inappropriate to put a document like the USAR (a dry 72 pages) onto a website and expect, via a Newsletter in a Parish Magazine, for Parishioners to find it, absorb it, be informed, and understand it. I realise that the Steering Group and the Qualifying Body are both incapable of grasping what is in the National Planning Practice Guidance, possibly because they have never read it. The NPPG says that the Qualifying Body should “ensure that the wider community has opportunities to be actively involved in shaping the emerging neighbourhood plan”. My point is, that the last opportunity for ACTIVE engagement by the wider community was in November 2014 at a Saturday/Sunday of ‘Options Days’. Since then, just publishing lengthy Draft NDPs on websites; or expecting people to turn up for briefings on a Wednesday morning at the village hall (difficult for those working); or to ring up a SG member to arrange an appointment at a pub is woefully inadequate. Active engagement means ACTIVE engagement, the Qualifying Body has to reach out and INVOLVE the community, not tell them what they want via a proxy which seems to have a fixed agenda.</p> <p>3. I understand that Kirkwells recommended to the Qualifying Body in a nonconfidential letter in April 2017, that there should be a second Regulation 14 consultation. However, Kirkwells’ independent and professional advice has been ignored, in favour of an Updated Sites Assessment Report which has been presented (to those who might find it) with no real context, and with no updated Draft Neighbourhood Plan either. In isolation it is meaningless. The only reference which the wider community has, is a June 2016 Regulation 16 Draft Plan which was rejected by Herefordshire Council and which resides in a state of limbo at Regulation 16 Stage on Burghill Parish Council’s and Herefordshire Council’s website. It was rejected not only for undeliverability of sites, but also because of lack of consultation. That document is quite clearly out-of-date because it has been stuck in a time-warp while Planning Permissions have been granted in the meantime.</p> <p>There are over 100 Completions and granted Planning Permissions (the USAR Table 1 is itself inaccurate, and it omits later PPs as well).</p>	<p>As a Council would put a Strategic Housing Land Availability Assessment online, the Parish Council made the Site Assessment Report available online. Drop in sessions were also held within the parish.</p> <p>The USAR forms part of the process of site allocation. It gives a desktop evaluation of sites.</p> <p>With regard to Kirkwells letter, this was based on allowing the community to comment on the amended site assessments. The PC have since carried out this consultation on the Site Assessment Report which will form part of the evidence base of the Neighbourhood Plan.</p> <p>The USAR forms part of the process of site allocation. It gives a desktop evaluation of sites. It is for the Parish Council to use this information together with identified and justified local knowledge to select the sites for allocation in the Neighbourhood Plan to go forward for submission.</p>	

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		<p>It is likely that the 18% target for housing growth will be achieved by granted Planning Permissions and completions together with a windfall allowance. Yet the in-limbo Regulation 16 Draft NDP still contains around 60 proposed allocations which are now well in excess of the 18% target (for 2011 to 2031) and which this USAR seems to expect the wider community to be commenting on. At no stage does the USAR attempt to remind the wider community that in the May 2014 Questionnaire, only 2% of the wider community actually wanted growth in excess of 18%! This dichotomy is quite Kafka-esque.</p> <p>Yes, of course, as Kirkwells recommended, there must be a proper 2nd Regulation 14 Consultation, with proper ACTIVE wider community engagement before such a second Regulation 14 Draft is produced. The USAR would, with corrections, and with other material, properly inform the wider community so that the community itself, and not some unelected body (12 of the 15 Parish Council members have never been elected) decides what the community wants. The Steering Group is supposed to facilitate the NDP and no more, although some of them seem to have other ideas, which is not what was intended by the NPPF.</p> <p>4. I am seriously concerned that the USAR does not weight the scores, it just adds them up. This means that the scoring does not adequately reflect the impact of show-stopping constraints. For example, showstoppers like lack of mains sewage and poor access and access visibility have parity with (for example) arguably more minor constraints like location and proximity to listed buildings.</p> <p>5. A particular constraint which is common to many of these sites is the inability to create accesses with adequate visibility splays. This has been ignored altogether.</p> <p>6. Yet again the fact that there is a Section 52 Agreement on part of Site 10 has escaped mention. The Section 52 demonstrates that it is not the all-Brownfield site that it previously has been claimed to be on many occasions. The existence of a Section 52 Agreement is a material consideration, and will not go away no matter how much the promoter of this site may wish. The Section 52 is, in effect, a restrictive covenant. In the USAR, much is made of Herefordshire</p>	<p>It is at this point the Neighbourhood Plan will be amended for progression to submission.</p> <p>Comments noted. Table of commitments updated.</p> <p>With regard to Kirkwells letter, this was based on allowing the community to comment on the amended site assessments. The PC have since carried out this consultation on the Site Assessment Report which will form part of the evidence base of the Neighbourhood Plan.</p> <p>As stated above the USAR forms part of the process of site allocation. It gives a desktop evaluation of sites. It is for the Parish Council to use this information together with identified and justified local knowledge to select the sites for allocation in the Neighbourhood Plan to go forward for submission.</p> <p>Comments noted and Site 10 amended accordingly.</p> <p>The Section 52 agreement prevents the storage of motor vehicle parts on an area of the land in Site 10. S52 Agreements may be varied or discharged by agreement under deed with the local planning authority and</p>	

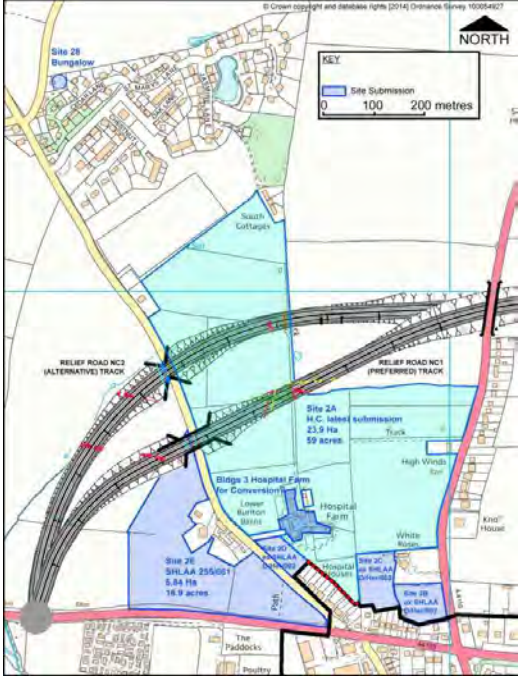
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		<p>Council's guidance on site selection supposedly being complied with. Page 9 of Herefordshire Council's Guidance Note 21 https://www.herefordshire.gov.uk/download/downloads/id/3712/guidance_note_21_guide_to_site_assessment_and_choosing_allocation_sites.pdf states that awareness of a restrictive covenant should be recorded. So don't ignore me yet again, please record this! I appreciate that a Section 52 might, with difficulty, be lifted, but even if it were to be lifted then 80% of Site 10 is then accorded the same status as other sites – greenfield, and quite properly loses its apparent special favoured status over other submitted sites.</p> <p>7. Site 10 is NOT "located centrally in the Tillington settlement". It is to the north of a disparate collection of a handful of houses. It beggars belief that this is supposedly "a settlement which will be the main focus of proportionate housing development". There is only the pub and one house (a guardian house, subject to a planning condition, in the ownership of the person who owns Site 10) on the north side of C1095 Tillington Road; and only 4 houses immediately bordering the south side of C1095 Tillington Road, (including another one, also in the ownership of the person who owns Site 10). It is quite bizarre that repeatedly in the USAR, proximity to the "Business Park" is cited as the reason for sites being justified for selection. The 'centre' could more plausibly be the pub, which dates from before 1867, rather than a so-called "Business Park" which only exists in the middle of the countryside because it gained planning permission in 1988 as a "car showroom", according to the then Parish Council, replacing "the proliferation of vehicles in the field where Mr. Tamplin wishes to build. His garage is already something of an eyesore and the field an unsightly mess". One wonders under what Planning Policies it was ever permitted, because now it seems to have been elevated to be the centre of Tillington New Town.</p> <p>8. There are conflicts with the Core Strategy which have not been adequately considered. The USAR parameter described as 'services' includes sewerage, i.e. waste water disposal but there is no weighting. For example, sites which are nearly 900 metres away from mains sewers (e.g. Tillington) are scored the same as sites which are adjacent to main sewers (e.g. Burghill). Core Strategy Policy SD4 is explicit: "In the first instance developments should seek to connect to</p>	<p>any other party to the original document.</p> <p>The site was scored in the updated site assessment report as Greenfield. However, based on information provided as part of this consultation it will be amended and scored part brownfield/part greenfield</p> <p>A decision was taken by the Parish Council that the Tillington area was identified as the area around the Tillington Business Park, where the few services in the settlement were located, and a settlement boundary was identified around this as a settlement.</p> <p>Site is centrally located adjacent to business area and pub and within the settlement boundary identified by the parish council</p> <p>As Herefordshire is a significantly rural county, many of the village identified in Tables 4.14 and 4.15 of the Local Plan Core Strategy do not have access to mains drainage. However, this does not preclude</p>	

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		<p>the existing mains wastewater infrastructure network.” There is no existing mains wastewater infrastructure network beyond the north-western tip of the Burghill village settlement boundary, so it is bizarre that sites are being allocated at all in, for example, Tillington; and even more bizarre that sites adjacent to sewers in Burghill are scored the same as sites in Tillington nearly 900 metres away, from where sewerage would need pumping uphill, if there were ever a pipe to pump it up. Local people in Tillington will be astonished, once this Plan has been crowbarred-through, and will wonder how this could have come about, when it is so blindingly obvious that there is no existing mains wastewater infrastructure network. Where are the Tillington parish councillors in all this? Asleep?</p> <p>9. In particular there is a mis-scoring concerning the proximity and significance of sewage infrastructure to Site 1C which is adjacent to the proposed unchanged Burghill settlement boundary. Fortunately this can be corrected because I have a non-confidential email dated 29 September 2014 from the Chairman of the Steering Group. It says “I have a contact in Welsh Water in Cardiff. A plan is attached. These things normally cost £30. This makes part of 1C a bit different.” It attached a drawing “Public Sewer near 1C”. In fact the public sewer is not only ‘near’ 1C, it runs directly under it! Here is the drawing, I did not wish to attach it as a separate file in case it became mislaid:</p> 	<p>development as drainage can be provided in alternative ways.</p> <p>The public sewer is a main sewer and will require diversion or necessary easements to be provided on site. However, the sewer can be accessed to provide services to the site and therefore as scored in the site assessment utilities will be required to service the site</p>	

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		<p>10. Furthermore, it is strange that sites around the Burghill settlement boundary (Burghill is unquestionably an established sustainable settlement, complete with a Golf Club Bar and Restaurant which undermines the trade at the pub in Tillington) have been scored so that they are less favoured for development than elsewhere. In fact this has been a consistent feature in the evolution of the NDP. Sites at Tillington and Lower Burlton seem to have been most favoured to be recipients of development, while sites at Burghill have tended to be less favoured, or excluded completely.</p> <p>11. In the USAR there are 2 extra criteria for Burghill - 'Conservation area' and 'Heritage Assets'. Therefore the scores for Burghill are out of 15, and those for Lower Burlton & Tillington are out of 13. Higher scores mean 'less favourable' for development. This is therefore yet more inbuilt bias, because Burghill sites have scores which add on these extra criteria. Example: a Tillington or Lower Burlton site might score 7/13 (54%); while a Burghill site might score 7 + 2 = 9/15 (60%). Or, in simple terms, seven-thirteenths is a lower number than nine-fifteenths, thereby ensuring that Tillington or Lower Burlton sites are scored so that they are more likely to be developed compared with the main settlement Burghill. It is subtle, but, as they say, every little helps (not to have development in the backyard).</p> <p>12. The HER scores are odd. For example (there may be more examples) only half of Site 34 West of the church is within the conservation area, but it is rated as if it were all in the conservation area. Then the other large sites in Burghill, in particular the Duchy sites 1A and 1C both get rated for Archaeological HER (Historic Environment Record) sites, although there are none within 1A, and the small part of an HER in 1C (a large site) is easily avoided.</p> <p>13. Why have the sites 1A and 1C been rejected out-of-hand? They are assessed – and were assessed similarly by the “PC & SG” – on the basis that the whole sites would be developed. Herefordshire Council Guidance Note 21 “Guide to site assessment and choosing allocation sites” does prompt for consideration of whether the basic idea of how the site may be developed is appropriate, or if there is a better way of doing it. Just because a landowner (the Duchy of Cornwall in this case) has made available a large site does not mean that all of it needs to be developed. Just part of it might be developed,</p>	<p>The site assessment has been carried out in a clear and transparent way in accordance with the Herefordshire Councils guidance note.</p> <p>Comments noted. The scores will be expressed as percentages to ensure consistency</p> <p>This arose as there are no Listed Buildings or Conservation Areas within the area identified as Tillington.</p> <p>Based on the information on display at the Options Days, both sites 1A and 1C both contain HER records.</p> <p>The details as to why they have been assessed in the way they have is included in the Site Assessment report.</p>	

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		<p>in a sympathetic way. Failure to consider alternatives like this is a common reason why Neighbourhood Plans fail either at examination or when a developer makes a challenge.</p> <p>14. One notes that the assessment for Site 35 does not mention that in the Regulation 16 Draft Plan, a careful observer can see by examining a very grainy map, that the green space near Leasown at the eastern end of Bakers Furlong has been extended beyond its current scope, the consequence of which is to block access to submitted Site 35, in direct contravention of NPPF which forbids the use of Green Space designation to block development.</p> <p>15. There are known areas within the Parish which are already susceptible to surface water flooding. It is inappropriate to rely solely on Environment Agency mapping, which does not identify many of these known problem areas. According to the USAR scores, none of the Tillington sites has known surface water flooding, it rates them as 'no known surface water flooding'! There certainly is surface flooding near them, which will be exacerbated not only from run-off but also from any contemplated local waste water treatment such as septic tanks or package treatment works! Local people do know these constraints, but have not been asked. Ask them!</p> <p>16. But then, for some Burghill sites, both 1A and 1C both supposedly have medium to high risk of flooding according to the USAR. However, if you go onto the EA mapping (https://flood-map-for-planning.service.gov.uk/summary/347902/244171 for 1C as an example) it does not show that flooding is a problem, both 1A and 1C are in Flood Zone 1 (the lowest risk). Same for 2A, the Hospital Farm site – USAR medium to high risk, EA mapping Flood Zone 1.</p> <p>17. The true housing density for Tillington and Tillington Common is 7 dwellings per hectare. Core Strategy RA2 states “.....design and layout should reflect the size, role and function of each settlement”. The settlement identified in Core Strategy Figure 4.14 was Tillington, but it was erroneously based on Tillington Common. https://www.herefordshire.gov.uk/download/downloads/id/1705/rural_housing_bac_kground_paper_march_2013.pdf (bottom of page 30).</p>	<p>A section of the Green and open space including access to the footpath is located at the end of Bakers Furlong and can be seen from a visit to the site.</p> <p>The scoring is based on information provided on the Environment Agency website rather than anecdotal evidence. As stated before the USAR forms part of the process of site allocation. It gives a desktop evaluation of sites. It is for the Parish Council to use this information together with identified and justified local knowledge to select the sites for allocation in the Neighbourhood Plan to go forward for submission.</p> <p>Comments noted. Surface water flood maps will be included in the Site Assessment Report as evidence of the scoring</p> <p>Based on a calculation of the area of the existing dwellings in the proposed settlement boundary and the number of dwellings, the existing density is 12 dph</p>	

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		<p>This remains uncorrected and unchallenged. At the very least, if whoever is responsible for this NDP continues to choose to ignore this material error in settlement assessment by Herefordshire Council, they might at least have the integrity to use the density of 7 dwellings per hectare which represents what was originally assessed, rather than some newly concocted density of 12 which has sprung up from nowhere.</p> <p>18. Again, repeatedly, I see the comment “Open Countryside, not adjacent to existing built form in settlement (See Criterion 1 in Herefordshire Core Strategy Policy RA2)”, as a justification for sites/buildings not being assessed. This has been wrongly applied to submitted sites or buildings which (not surprisingly in a Rural Area) are indeed rural but which do conform with other Core Strategy Policies RA4 (Rural enterprise dwellings) and RA5 (re-use of Rural Buildings) and also with national Permitted Development Rights. This is such a gross dismissal, that to a reasonable person it appears as though someone is seeking to exclude valid sites/buildings which are appropriate within a rural landscape while increasing the opportunity to create new builds which are a blot on the established landscape and built form.</p> <p>19. Site 2A (Herefordshire Council Hospital Farm land – in light green on the map on the right) is actually adjacent to the existing (UDP) Hereford City Settlement boundary (in black on the map). Where 2A is adjacent to the Settlement Boundary, it is marked in red dots. In the USAR, it is wrongly recorded as ‘Open Countryside’. Application of criteria must be consistent. The problem is, that no-one ever wants to check these details, especially if they yield a result which is less favourable, and which might spoil the view from St Marys.</p>	<p>Comments noted. A decision was taken by the Parish Council that the Tillington area was identified as the area around the Tillington Business Park, where the few services in the settlement were located, and a settlement boundary was identified around this as a settlement.</p> <p>The area north west of Tillington, around the Common was not included in the identification of the settlement, in a similar way to St Mary’s not being identified as within the Hereford or Burghill settlement boundary, due to the distance from services.</p> <p>Sites in open countryside are not suitable for allocation in the Neighbourhood Plan, however should an application be submitted, it would be assessed against Policies RA3, RA4 and RA5 where relevant. It is not for the Neighbourhood Plan to repeat policies in the Herefordshire Local Plan Core Strategy.</p> <p>Site 2A is predominantly open countryside spanning between the C1095 and Canon Pyon Road.</p>	

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		 <p data-bbox="495 898 1317 1415">20. Clearly Kirkwells has spent time on the USAR. Table 1 – ‘Planning Commitments in Burghill Parish from 2011’ is not, I believe, quite right because it omits some completions/commitments including recent ones. However, although dated March 2017, its document properties show that the USAR was finalised on 3 April 2017. The Table 1 includes P160048/O – the 50 houses on Land between Tillington Road and Roman Road – as a commitment but does not cumulate them into its total. That is presumably because the Section 106 and Decision Notice had not appeared – they went online on the Herefordshire Council website on 24 & 25 April 2017. However in paragraph 2.5 of the USAR these 50 houses are referenced and included in an overall total. There seems to have been a grudging reluctance to accept these 50 houses as a reality: · Herefordshire Council Planning Committee approved the Application on 2nd November 2016. · There was then a period while the Section 106 Agreement was resolved – as with any planning application, this is effectively a formality. · The S106 was signed and dated 25 April</p>	<p data-bbox="1339 1145 1778 1262">Comments noted. Whilst the decision notice had not been issued, the 50 houses was included in the cumulative total</p> <p data-bbox="1339 1299 1778 1326">The table been updated accordingly.</p>	

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		<p>2017, the Decision Notice was published dated 26 April 2017. · Yet I am aware that in a non-confidential email in early June to all members of the Steering Group and Parish Council, the Steering Group Chairman asserted: “Despite current planning permissions appearing to meet the required housing commitment, there is still an immediate shortfall of 50 dwellings up until at least March 2020. This is due to the infrastructure imposition of planning condition No 11 for the planning permission granted for the site for 50 dwellings in the Lower Burlton zone. There is a risk that any competent examiner would cite this shortfall as an impediment to the progress of our NDP. It is certainly a delivery shortfall that could be targeted by any objectors to our NDP.”</p> <p>· Then at the Parish Council Meeting on 14 June 2017 (which a member of the public recorded), the Steering Group Chairman asserted: “the 50 houses at the lower end of Tillington Road.....I know it's within the plan period but it is a sufficiently large gap for a competent developer to drive a wedge into our plan and say instantaneously we have not satisfied the 18% on deliverability. If as a Parish Council you wish to take that chance, that's fine.....”</p> <p>· So on two occasions in June, after it was known that the 50 houses application had been formally approved by Herefordshire Council, the Chairman of the Steering Group was telling the Parish Council that (a) “any competent examiner” would cite the planning condition on the 50 houses as an impediment to the progress of the NDP and (b) that “a competent developer” could claim that deliverability is not met.</p> <p>· However, at that same Parish Council Meeting on 14 June 2017, a (competent) parishioner read out aloud (but was ignored and attacked with a barrage of faux outrage in public, demeaning and disrespecting the parishioner in front of the Parish Council, which just stood by and did nothing to stop that behaviour) an email from Herefordshire Council which said: “The 50 dwellings permitted under 160048 can be accounted towards the proportional growth target despite the Welsh Water condition. The reserved matters application would need to be submitted within the required timeframe to ensure the permission did not lapse. Proportional growth consists of all commitment via planning permission which can be delivered within the plan period.”</p> <p>· What could be clearer than that? Herefordshire Council, the parent authority, the authority responsible for setting the 18% target, was saying unequivocally that the 50 houses could be “counted in”,</p>	<p>Whilst the application had been approved by Herefordshire Planning Committee, the site does not become a commitment until the decision notice is issued.</p>	

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		<p>subject to reserved matters being submitted (just as any planning application subject to reserved matters has to do). This is all very strange. On the one hand, the Steering Group Chairman is asserting to the Parish Council that “any competent examiner” or “any competent developer” would challenge deliverability if the 50 houses were included in the NDP (presumably without putting in extra sites as well) while on the other hand, Herefordshire Council is stating that the 50 houses do count.</p> <p>21.I could go on, but knowing that it will be a complete waste of time because my comments will most likely either be ignored, or rubbished out-of-hand, I will leave you, Kirkwells, with one final thought. Figure 4.14 in the Core Strategy designates two settlements within Burghill Parish as “The settlements which will be the main focus of proportionate housing development” – Burghill, and Tillington. As many people are beginning at last to appreciate, despite the failure of the Parish Council and Steering Group properly to engage with them, the inclusion of ‘Tillington’ was made on a false basis by Herefordshire Council, and that remains unchallenged by those who appear to be responsible for this car-crash of a Neighbourhood Development Plan.</p> <p>However, where in the Core Strategy is “Lower Burlton” named as a settlement which will be the main focus of proportionate housing development? Therefore, the inclusion of Lower Burlton (White Roses, Sites 2B, 2C, and 2D) is entirely dubious.</p>	<p>Comments in relation to Tillington and Burghill are addressed within the responses to this consultee.</p>	
37	Terence Edward McDonald-Smith	<p>This letter is written on behalf of myself my wife, Jennifer Clare Smith and son Andrew Robert McDonald-Smith.</p> <p>We are concerned that there are plans issued for the parish without notification to the residents of the parish concerning the NDP, without notice and consultation with the residents. We have seen no notice issued had only one letter from a group of parishioners dated June 2017 concerning the above.</p> <p>We would strongly object to the proposals concerning development of the parish housing as in recent years the area has grown in residential development, not enough planning notification had been given to any individual neighbours concerning the above.</p>	<p>Comments noted. Comments noted. The 18% target for Burghill Parish is identified through the Herefordshire Local Plan Core Strategy amounting to a minimum target of 124 dwellings. To date planning commitments total 106 dwellings resulting in a balance of 18 dwellings. In order to be in general conformity with the Local Plan Core Strategy, the NDP should identify the target number of</p>	No change

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		<p>Any development should have the views of the neighbours that are effected. In the aforementioned letter it states future development at Redstone neither this house or our neighbours have been consulted on plans concerning Redstone, and we all feel that as Manor fields was built behind us that there is enough development on this road. There has over the years been an increase in traffic, due in part to the development of the golf club and the number of car's per household, and that the roads are not appropriate for future development in this area. Speed limits are not the answer either to allow future development. Only the widening of road if there is additional traffic.</p> <p>I will end this letter by saying that we in Redstone in the main will oppose the PND for this area.</p>	<p>dwelling to come forward in the plan period.</p> <p>A number of consultations have taken place as part of the Neighbourhood Plan Process, including the initial Options Days consultations, the Regulation 14 consultation, the Regulation 16 consultation and this consultation on the Site Assessment reports.</p>	
38	Leon Crockett	<p>I am writing in respect to the Burghill Neighbourhood Development Plan.</p> <p>From the information available, it would appear that Burghill Parish has already met the minimum number of houses that needed to be built, or already been given planning to be built. During the initial consultation the community stated it wanted a minimum amount of development within the Parish, yet there has now been an updated site assessment report dated March 2017. Again, many people will be unaware of this as it is not easy to access the relevant information, and specifically people like my neighbour who is housebound and has no use of the internet, will have no voice in this matter.</p> <p>My concerns are predominately to do with site 2B (Lower Burlton), which is closest to my home and will have a direct impact to myself and my family. I do not have any knowledge to comment on any of the other sites.</p> <p>We have already raised our concerns for this site, and the developer has recently made a failed planning application (162299) so it is unclear to me why the site would still be part of the BNDP.</p> <p>The access is still going to be unsafe.</p> <p>Our Septic Tank is in the field but it has been omitted from the reassessment, so is this going to leave 4 properties without sewage? How will our properties be protected from the risk of flooding, as the field is prone to this?</p> <p>I would like to ask that sites 2C, White Rose (these sites are viable if 2B is deliverable) and 2B be removed from the BNDP.</p>	<p>Comments noted. Comments noted.</p> <p>The 18% target for Burghill Parish is identified through the Herefordshire Local Plan Core Strategy amounting to a minimum target of 124 dwellings. To date planning commitments total 106 dwellings resulting in a balance of 18 dwellings. In order to be in general conformity with the Local Plan Core Strategy, the NDP should identify the target number of dwellings to come forward in the plan period.</p> <p>The USAR forms part of the process of site allocation. It gives a desktop evaluation of sites. It is for the Parish Council to use this information together with identified and justified local knowledge to select the sites for allocation in the Neighbourhood Plan.</p>	No change

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		<p>I do appreciate that the steering group have a difficult job to do and I understand that there needs to be planning passed as houses need to be built to achieve the government targets. However there seems to be a lack of consideration given by the developers to the people who these projects directly effect, and this is something that needs to change. If the Parish has already met its quota of houses then who in the Parish will gain anything from more planning applications being passed? To me it will just be the developers. As our home is on the edge of Burghill Parish it means we are also affected by sites being developed in neighbouring parishes, so I feel it is even more important that you represent our interests over the developers.</p>		
	Sarah Crockett	<p>I am writing to comment in respect to the Burghill Neighbourhood Development Plan.</p> <p>Firstly, I want you to know that I appreciate that undertaking such a task is a difficult job and I'm sure the volunteers on the steering group have worked very hard. However, as a resident of the parish I have not found it easy to keep up to date with its developments and have concerns about the level of proactive community consultation. Previously I have contributed to the questionnaire and to the initial draft of the plan, yet on both occasions I did not receive any acknowledgement of my involvement or comments. In fact, when I submitted comments in March 2016, it was only when I contacted Herefordshire Council that I was aware of the steering groups responses to them. In general, I have felt that information about the BNDP has not always been available, even today the Burghill Parish Council website states that: "Documentation is available to view on Herefordshire Council's website (a link is attached below)" but I cannot find the relevant link on the page. Also the last meeting notes are for November 2016, but I presume there has been activity relating to the BNDP since this time (some 7 months)?. When I have found information online, despite my best efforts it has been difficult to follow and understand as the documents have been very lengthy and often contain a lot of technical wording.</p> <p>I am concerned that there will be many residents within the parish, whom may have lived in the area for many years, but who now find it difficult to leave there home and or who have no access to the internet. This is the case for one of my neighbours. I am concerned that due to the nature of how the consultation has taken place and how subsequent information has been made available that there will be many in our community who would have been excluded indirectly.</p>	<p>The 18% target for Burghill Parish is identified through the Herefordshire Local Plan Core Strategy amounting to a minimum target of 124 dwellings. To date planning commitments total 106 dwellings resulting in a balance of 18 dwellings. In order to be in general conformity with the Local Plan Core Strategy, the NDP should identify the target number of dwellings to come forward in the plan period.</p> <p>The USAR forms part of the process of site allocation. It gives a desktop evaluation of sites. It is for the Parish Council to use this information together with identified and justified local knowledge to select the sites for allocation in the Neighbourhood Plan.</p>	No change

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		<p>From the information I have seen, it appears to me that Burghill Parish have already meet the minimum number of houses that needed to be built (either that have already been built or already given planning permission). Therefore I do not see it necessary to include any additional sites for development within the BNDP, especially when during the initial consultation the community feedback very strongly communicated that they wanted the minimum amount of development within the parish. Any further development within the parish would only service to benefit a small number of land owners and developers who may not even live within the parish. It would not be meeting the needs of the parish residents.</p> <p>More specifically I would like to comment on the updated site assessment report, dated March 2017 produced by Kirkwells. I would like to point out that given my comments above, to have a reassessment seems to me to be an unnecessary expense and a misuse of public funds.</p> <p>My comments relate predominately to site 2B (Lower Burlton) as this is the site closet to my home and of which I know the most about. I do not at this stage feel informed enough about other sites to make further comments.</p> <p>In respect to the scoring, page 69, Appendix 2: Accessibility has been given a score of 0.5. Whilst it may be the case that the site itself is 201/400 meters to bus stop/close to services there is a significant issue with pedestrian access. If the development were to go ahead, pedestrian access would be to the Canon Pyon Road. Pedestrians would have to cross the road at the junction to the new development to access a footpath as existing building prevent a footpath being installed on the same side of the road. Assuming they can safely cross this busy road near the bend the footpath they join is very narrow and would not accommodate a wheelchair user or a pushchair. Again it cannot be changed due to existing buildings. This is not reflected in the site reassessment. Access has been given a score of 0.75. I think this is a matter of dispute, in that the score could be 1 due to the issue surrounding the ownership of the strip of land to the right of the site and Canon Pyon Road. Potentially making this a landlocked site, with no right of access to any road.</p> <p>Suitability has been assessed as a 0.5 (significant constraints). I would propose that the score is actually 1 due to the site being totally inappropriate. The developer who owns site 2B recently made a</p>	<p>Comments noted</p> <p>The scoring for Site 2B has been reassessed due to information received in response 1, and additional information submitted.</p>	

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		<p>failed planning application (162299). This is briefly mentioned in this reassessment, however, again the FACT that the septic tank for four properties is located in this field has been omitted. If this development were to go ahead it would leave four properties without sewerage. The site also has a history of other failed planning application attempts.</p> <p>The reassessment states that the sites achievability is 11-14 years possibly. I cannot see, having been party to the documentation of the recent planning application how the issues with the site can be overcome, especially not before the 2031 timeframe. Furthermore, just looking at the scoring for other sites it would seem that this site is one of the least attractive, with many other sites scoring more favourably. Given that my understanding is that we have as a parish already met the number of houses needing to be developed I believe this site should be removed from the BNDP, along with site 2C and White Rose (as both of these sites are only viable if site 2B is deliverable). I would appreciate it if you could please acknowledge receipt of this email.</p>	<p>Comments noted</p>	
39	Duchy of Cornwall	<p>I have read the Burghill Neighbourhood Plan Site Assessment Report (March 2017) with interest and understand that you are seeking comments until the end of June 2017.</p> <p>I note that part of the Duchy of Cornwall estate in the centre of Burghill has been included.</p> <ul style="list-style-type: none"> • Site 1A, Land east of the Copse, 3.2 hectares • Site 1B, Land north east of Burghill Court, 1.7 hectares • Site 1C, Land between Haymeadow Farm and Home Farm, 4.1 hectares • Site 21, Land opposite Burghill Golf Club, 1 hectare <p>There are no known constraints on these parcels of land and we are not aware of any evidence of contamination on Site 21. Land necessary to meet housing need can be made available while the balance can continue in agricultural use or contribute to community infrastructure such as a park or other purpose. For example, the frontage of Site 1A or IB or 1C (or a combination) could be made available to meet the housing need.</p> <p>The Duchy would be pleased to work with the Parish and make land available to meet housing needs at a density, design and layout appropriate to the village. I enclose a Design Brief for Herefordshire that the Duchy commissioned in 2014 which underlines our commitment to designing new houses with care and diligence. The</p>	<p>Comments noted</p> <p>Contamination can relate to previous uses as orchards as advised by Herefordshire Council's Environmental Health team</p> <p>Comments noted. As part of the site assessment it was flagged if part of the site was suitable for development.</p> <p>The Parish Council would like to praise the Duchy on the quality of the Design Brief</p>	No change

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		<p>Duchy is committed to community engagement. If Duchy land was to be identified for allocation we would welcome the opportunity to work with the community to ensure that new development compliments the village and builds community.</p>		
40	Beryl White	<p>From my visits to Parish Council meetings I get the impression that making comments on this long and expensive document is going to be a total waste of my time. What is the point when comments will be totally ignored? From my experience as a resident of the parish for two years, no one has been able to penetrate the fortification known as the Steering Group. (I could call it by another name and be nearer the truth!) There has been no eagerness to take on board proposals or suggestions from members of the public. In fact, you get the impression that it is not allowed, and the atmosphere is most unpleasant and one of a feeling of being 'the enemy within'! The pretence is that there has been consultation!! That's the joke. The consultations have been no more than 'comments on a done deal'....and the comments are then rubbished! If Herefordshire Council want an example of how not to conduct a neighbourhood development plan, then this is it in my opinion.</p> <p>The USAF is difficult/virtually impossible to comment upon because I have forgotten what the original looked like and I cannot find a copy anywhere, even on-line. What does seem odd is that we have a scoring system which fails to take into consideration the position of the sites with regard to traffic. Being a site near to a listed building and that's it.....not to be considered, end of story! Being a site in the vicinity of narrow winding roads with little good visibility doesn't seem to matter as much.....these sites can be taken on board! There also seems to be a suggestion that it is an advantage to be near to a bus stop. Let's get real! Everyone living in the countryside, beside a bus-stop or not, needs a car!</p> <p>We missed the early months of the NDP so cannot comment on that, but anyone with a mite of common sense can see that the process has been flawed. There is a feeling that the plan was predetermined, and this is the reason why it has been impossible to shift the stance of the Steering Group. We have ended up with an unfair distribution of sites which will create mini housing estates. This will be much out of keeping with the present situation.....and this is totally against the guidelines set out for Steering Groups and Parish Councils. We do not have a Parish Neighbourhood Plan for the residents of the parish. It has been produced by a very few and does not reflect well on their</p>	<p>A number of consultations have taken place as part of the Neighbourhood Plan Process, including the initial Options Days consultations, the Regulation 14 consultation, the Regulation 16 consultation and this consultation on the Site Assessment reports.</p> <p>Comments noted. The original Site Assessment Report was completing re-assessed as part of this update and is therefore no longer required as part of the evidence base.</p> <p>Comments noted</p>	No change

Ref. No.	Consultee Name	Comments received	Kirkwells Comments	Amendments to SAR
		<p>actions as representatives of the general public of our parish of Burghill.</p> <p>There has been some very strange decisions and one has to ask why. In Sections 2.5 Table 1, and 2.6 the USAF mentions a shortfall of 25 dwellings. This is rubbish! The last entry to Table 1 ignores the 50 houses WHICH HAVE BEEN APPROVED. The Chairman of the Steering Group has no right to exclude these 50 houses. We have proof from Herefordshire Council that states that these houses ARE available for our NDP!! There is no shortfall. It is also very strange that the "Parish Council (!)" objected to the planning application for these 50 houses. Make of that what you will.</p>	<p>Comments noted. Whilst the decision notice had not been issued, the 50 houses was included in the cumulative total</p>	
41	Brenda Warde	<p>When there was the previous consultation concerning the building of houses in Burghill & Tillington I made a number of comments including one on the proposal to build at Crowmore Cross behind the shop and industrial units. I am amazed that the PC are still considering this as a possible site for housing, especially as Tillington can already meet the planned target for growth on other sites. The site by the shop is very restricted by existing buildings, is high above the road, especially on one side, has a conservation area at one end, and is lined by telegraph poles along a single-track road on the approach to Court Farm. Even preparation of this site in removal of trees, undergrowth etc. to make it usable for building would be difficult and very expensive. I cannot see how safe and practical access for the traffic which would be associated with the housing could possibly be provided. Indeed, I cannot imagine who would want to live on such a crowded and restricted site. The shop particularly and the present work sites are an asset to the village and should be supported. I am not opposed to new housing as such and some is already on offer. One or two houses behind the Bell might be a reasonable proposition, but I am surprised that members of the PC should view this particular site for up to 24 houses as a sensible part of any development plan.</p> <p>yours sincerely</p>	<p>Comments noted</p>	<p>No change</p>
42	Sue Watts Cutler	<p>The circular which has recently landed on my doorstep (copy enclosed) makes some serious allegations about the performance of the Parish Council with regard to housing development in the parish. Given that this issue is perhaps the most important concern of local parishioners, I am worried by the suggestion that the Parish Council</p>	<p>Comments noted</p>	<p>No change</p>

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		<p>may not be defending majority interests in this matter as they are appointed to do.</p> <p>It was made clear in the 2016 NDP consultation that the majority of us want as little new housing development as possible in order to protect our local environment, history, archaeology, farm land and harmonious communities. Indeed, if you were to ask local people to speak freely (as opposed to offering them the choice of two unwelcome compromises, as with the 2016 consultation) most would say that they did not want any newbuild housing developments at all in the parish. Under such circumstances, I think it behoves the Parish Council to ensure that not one square inch of precious farmland is surrendered unless legal obligation forces you to do so.</p> <p>Yet, according to the authors of this circular, the Parish Council is currently risking large scale housing development 1) by default by not producing an acceptable NDP for Hereford Council in time to prevent them building whatever they want to here, and 2) producing a draft plan which is actually offering to accept 60 more dwellings beyond what is required.</p> <p>Time does not stop in 2017: as long as the insane current population explosion continues nationally, then further pressure will inevitably come from either local authority and/or Westminster for yet more housing. It is thus inexcusable to willingly exceed the statutory 18% forced upon the parish now.</p> <p>Another recurring allegation made in this circular is that, despite Hereford Council and Kirkwells having drawn attention to the need for public consultation with the parishioners, this does not seem to have happened, suggesting (if I understand the text correctly) that the second draft NDP may also be invalidated as was the first, leaving no NDP and handing over development to Hereford Council again.</p> <p>It is suggested in the circular that amendments to the current draft NDP will reduce housing development to the statutory 18% acceptable to Hereford Council. This draft would then be put for public consultation and submitted to Hereford Council by the appropriate deadline.</p> <p>If this is the best defence we can offer against becoming an unwelcome extension of Bobble stock, then it seems to me that an immediate public meeting for consultation on the matter should be</p>	<p>Comments noted. The 18% target for Burghill Parish is identified through the Herefordshire Local Plan Core Strategy amounting to a minimum target of 124 dwellings. To date planning commitments total 106 dwellings resulting in a balance of 18 dwellings. In order to be in general conformity with the Local Plan Core Strategy, the NDP should identify the target number of dwellings to come forward in the plan period.</p> <p>A number of consultations have taken place as part of the Neighbourhood Plan Process, including the initial Options Days consultations, the Regulation 14 consultation, the Regulation 16 consultation and this consultation on the Site Assessment reports.</p>	

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		called urgently, where we parishioners can hear both sides of this story.		
43	Savills on behalf of Farmcare	<p>These representations are submitted on behalf of Farmcare Ltd which, as previously outlined, owns, manages and farms the Tillington Estate which includes much agricultural land and buildings within the Burghill Parish.</p> <p>This letter is submitted in response to the current public consultation on the Updated Site Assessment Report (USAR) which has been prepared to support the Draft Burghill Neighbourhood Plan. This letter does not repeat the national planning policy guidance and legislation relating to neighbourhood plans and the requirements for such documents and their policies to be in general conformity with the adopted Development Plan for the relevant local authority area, rather we seek to comment on the updated USAR and the conclusion reached in respect of the sites assessed only. Representations have been submitted in response to previous consultations and, in particular, this letter should be read in conjunction with our letters dated 11 March 2016 and 18 August 2016 which are enclosed for ease of reference.</p> <p>In our submissions previous submissions we observed that the assessment of the sites in the SAR had not been undertaken in accordance with the Herefordshire Council Neighbourhood Planning Guidance Note 21: Guide To Site Assessment and Choosing Allocation Sites and, that the scoring of the eight Farmcare sites had been scored too high, particularly in relation to their 'constraints'. We recognise that the USAR has been prepared using a scoring system which better reflects the Herefordshire's guidance.</p> <p>Notwithstanding, we continue to have concern that the seven Farmcare sites that have been re-assessed have, again, been scored too high.</p> <p>Detailed comments have been made with regard to each of the submitted sites in the tables enclosed with this letter (Table 1, 2, 3 & 4). A summary of the table compares the scores determined by Kirkwells with the score determined by Savills for Farmcare sites (white) and allocated sites (blue).</p> <p>Tables 1, 2 3 and 4 are included in Appendix 2 of this document</p>	<p>Comments noted</p> <p>The site assessment has been carried out in a clear and transparent way in accordance with the Herefordshire Councils guidance note.</p> <p>With reference to scoring as follows:</p> <p>Tillington</p>	Amend accordingly

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		<table border="1"> <thead> <tr> <th>Site Ref.</th> <th>Site Status</th> <th>Kirkwells Score</th> <th>Savills Score</th> </tr> </thead> <tbody> <tr> <td colspan="4">Burghill Sites</td> </tr> <tr> <td>21</td> <td>Allocated</td> <td>6.25</td> <td>6.75</td> </tr> <tr> <td>34</td> <td>Rejected</td> <td>12.25</td> <td>10.75</td> </tr> <tr> <td>35</td> <td>Rejected</td> <td>8.75</td> <td>8.25</td> </tr> <tr> <td>36</td> <td>Rejected</td> <td>9.25</td> <td>7.75</td> </tr> <tr> <td colspan="4">Tillington Sites</td> </tr> <tr> <td>10</td> <td>Allocated</td> <td>6.25</td> <td>6.75</td> </tr> <tr> <td>22</td> <td>Allocated</td> <td>5.75</td> <td>5.75</td> </tr> <tr> <td>25</td> <td>Allocated</td> <td>4</td> <td>4</td> </tr> <tr> <td>39</td> <td>Rejected</td> <td>6.75</td> <td>3.75</td> </tr> <tr> <td>40</td> <td>Rejected</td> <td>7.25</td> <td>4.75</td> </tr> <tr> <td>41</td> <td>Rejected</td> <td>8.75</td> <td>7.75</td> </tr> </tbody> </table> <p>As the above table indicates, the Savills Score for Farmcare sites 39 and 40 score better than sites that Kirkwells have found to be most favourable for allocation as recommended to the Parish Council in Section 4 of the SAR.</p> <p>The tables enclosed with this letter provides a more detailed assessment of the above identified sites, in comparison to the Kirkwells assessment. This again highlights the errors made in the scoring system. Indeed, evidence of the rationale behind the scores attributed to all the assessed sites in the Kirkwells is better than previously presented however it still falls short of being reasonable. Regrettably, two of the Farmcare sites (nos. 37 and 38) have again been immediately ruled out before any detailed assessment of their constraints, access and impacts. On this basis, it is our view that the site assessment report currently does not evidence a robust assessment of the submitted sites and, therefore, the current scores cannot be relied upon. For the reasons set out above, the BNDP fails to contribute towards the achievement of sustainable development and fails to meet the 'Basic Conditions' required by TCPA 1990.</p> <p>Conclusion</p> <p>These representations are submitted by Savills on behalf of Farmcare Ltd which is a major land owner within Burghill Parish. We recognise that there is a vast improvement in the assessment criteria used to score sites in the USAR, however we remain of the opinion that the draft BNDP fails to meet three of the 'Basic Conditions' required by TCPA 1990.</p> <p>We continue to welcome the opportunity to meet with the Parish Council to discuss the points made in this representation, prior to submitting the plan to Herefordshire Council.</p>	Site Ref.	Site Status	Kirkwells Score	Savills Score	Burghill Sites				21	Allocated	6.25	6.75	34	Rejected	12.25	10.75	35	Rejected	8.75	8.25	36	Rejected	9.25	7.75	Tillington Sites				10	Allocated	6.25	6.75	22	Allocated	5.75	5.75	25	Allocated	4	4	39	Rejected	6.75	3.75	40	Rejected	7.25	4.75	41	Rejected	8.75	7.75	<p>Site 10 – agree with Minor impact on landscape – amend accordingly</p> <p>Site25 – Site would consolidate development within identified settlement rather than encroach into open countryside</p> <p>Site 21 – Disagree. Site would impact on views within the settlement but not on views from outside the settlement</p> <p>Sites 39-40 – Contamination from previous uses as orchards as advised by Herefordshire Council's Environmental Health team</p> <p>Site 41 – Disagree. Site extends development into open countryside</p> <p>Burghill sites 34,35 and 36 have been scored in a fair manner</p>	
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44	Mrs Mona Church	<p>I am writing to you to raise my concerns and forward my comments to the Parish Council regarding the final draft of the Burghill Neighbourhood Plan. I would be grateful if you would take these comments into consideration.</p> <p>1. Proposed properties to land east of Bakers Furlong. I am concerned about the proposed development for several reasons. Firstly, the junction at the entrance to Bakers Furlong is sub-standard with poor visibility. An additional 54 dwellings would vastly increase the number of vehicles using the junction and therefore increase the risk of accidents to pedestrians and vehicles. Secondly, we already have issues with water pressure at the top end of Bakers Furlong and an increase in housing would only add to this. There is also a history of sewerage problems in the village with the current sewerage system operating at near to capacity. With the additional 24 dwellings currently being built between Bakers Furlong and Burghill Golf Club, I believe the system would not withstand an additional 54 dwellings from Bakers Furlong. My neighbours and myself have also had issues with flooding due to run-off from the fields in the orchards. Building on the area where the water naturally runs and collects would only add to this problem.</p> <p>2. Protected open space I support the proposal to retain the green area between Bakers Furlong and Leasown to remain a Protected Open Space as upheld by a Planning Inspector at Planning Appeal.</p> <p>I hope my comments will be taken into consideration by the Parish Council when considering the final draft of the Parish Council Plan</p>	<p>Comments noted. The report re-assesses the sites put forward throughout the process and gives some guidance for the Parish Council/ Steering group (as was) as to the suitability of proposed sites for future allocation in the Neighbourhood Plan.</p> <p>The USAR forms part of the process of site allocation. It gives a desktop evaluation of sites. It is for the Parish Council to use this information together with identified and justified local knowledge to select the sites for allocation in the Neighbourhood Plan</p>	No change
45	M Symonds	<p>With regards to your letter concerning proposals for building houses in Burghill and Tillington. Build homes on brown and waste land not on good agricultural land. Why not build some on Tillington Common land. My main concerns are: No main sewerage system, where is all the waste going to go The local school has it got sufficient capacity to take in lots more children, not only that there is not sufficient car parking spaces now for people to drop children off at school. Cars are already being parked on road back to bad bend. Accident waiting to happen.</p>	Comments noted	No change

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		Burghill and Tillington roads are like race tracks at times plus more large and heavy agricultural machinery using the roads taken all the road at times		
46	C Reynold	In a nutshell I am very unhappy with the way Bu8ghill Parish Council have been handling the NDP. I agree that an NDP is needed, but with regard to the number of houses being planned it would appear that the parish's quota has already been reached, yet the parish council is going ahead to build another perhaps 60 dwellings. We do not need them in my opinion and I should be grateful if my letter of protest is recorded in your records	Comments noted	No change
47	Mr & Mrs Krafft	Having recently received details of the above including data which itemises the fact that Burghill Parish has already met the 18% target increase for extra housing, we, the undersigned support the proposal of an NDP which only contains sites which already have planning approved plus a provision for windfalls.	Comments noted	No change
48	Marjorie Byers	I am appalled at the high numbers of new homes being considered for the Burghill/Tillington villages and would support only those sites which already have planning approval. I have lived here for fifteen years and witnessed the growing number of vehicles using Tillington Road. I am very unhappy about the proposed new homes at virtually the junction of Tillington Road with Roman Road – already a very busy junction. The proposals for so many new homes seems totally out of keeping with the villages bearing in mind this winding country lane. In my experience, these days, each new unit brings two new cars. I realise some new houses are arguably needed but with those already approved (including the large development across the road from Burghill valley Golf Course) – enough is enough. I would hate to lose the village atmosphere and ambience which attracted my late husband and myself to move here 15 years ago.	Comments noted	No change
49	C Roberts	Bakers furlong has 30 properties a mixture of houses and bungalows. My bungalow is very close to the entrance. This junction is poorly laid out for the number of cars that already use it. If the proposal for 54 more dwellings need to use this road then I foresee accidents happening to both cars and pedestrians. A further worry for the village is the sewerage problems. We were advised back in 2008 that the main sewer was close to capacity. We currently have 24 houses being built (site opposite the golf club) so a further large number being built could affect the village in an adverse way.	Comments noted	No change

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		I hope the Parish Council will take these concerns into consideration when the final decisions are made.		
50	Mr & Mrs Parker	<p>On reading the letter delivered recently we would like to add our views.</p> <p>The Parish Council as we believe is for the people of the parish; meaning everyone, as they were elected, we rely on you to make good sound decisions that effect the good running and well being of the parish. These decisions which including proposed planning obviously come first to you for approval etc. Surely if conclusions or outcomes effect or are likely to effect the parishioners we should be informed e.g. through the parish magazine; or why have we got a magazine or is it only for adverts!</p> <p>As we live at Redstone and have done as a family since 1954 and have now purchased our house we think we are entitled to know what is going on around us or proposed to, i.e. "the Redstone site" currently in the PC plan why haven't notices been put up if the magazine is not an option, we do have notice boards. We would like to know where the site is planned to be exactly and how many houses would be built.</p> <p>As for the rest of the "plan" surely the roads and the sewerage ought to be considered.</p> <p>The roads presently are a disgrace what with the potholes and bad hedge trimming and sometimes non-existent. of course very narrow in places that we accept, and the fact that 1 new house brings 2 extra cars.</p> <p>The sewage drainage is a concern as will the present pipes be able to take the extra waste and the surface water drains can't cope now after a heavy rainfall, some of us have serious problems with our gardens flooding which seem only to have happened since the building of Manor fields.</p> <p>Many of us around here have worked locally to be able to remain in our village so therefore we are concerned to what happens. Yes, we and still are council houses some of us own our houses this also applies to Manor Fields but we don't want to become the poor relations of the village where the building of low cost houses for renting becomes the norm.</p>	<p>Comments noted. Parishioners have been kept informed through posters advertising events and regular updates in the Parish Magazine.</p> <p>Comments noted</p> <p>Comments noted</p> <p>Comments noted</p>	No change
51	Mr G Taylor	I am writing regarding the above report and would be grateful if my comments and observations could be taken into consideration before approval of the final version of the Burghill Neighbourhood Development Plan.	All comments noted. See response to 18 above	See changes detailed in 18 above

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		<p>I understand there is a proposal to build 54 houses in the orchard with sole access from the present eastern end of Bakers Furlong. I find it difficult to believe that any planning authority could have even considered this as a viable option, bearing in mind a number of factors, which would militate against the proposal:</p> <p>1. (a) The present narrow roadway serves 30 houses. It was constructed in the 1970s initially to serve even less housing and was unadopted, being deemed by Herefordshire Council as inadequate. After much deliberation and subsequent minor modifications, it was reluctantly adopted in 2008. Since then the number of cars owned by the 30 householders has greatly increased and the reasons for the Council's initial unwillingness to adopt has become clearer.</p> <p>1. (b) Where Bakers Furlong turns south towards the junction opposite Pyefinch House, it is almost impossible for cars to pass without stopping and waiting for the other to proceed. There have also been occasions when lorries requiring access have blocked the roadway completely, necessitating delays till their business is concluded.</p> <p>1. (c) One of the objections by the Council to adoption was the junction opposite Pyefinch House, which could not be altered. It is almost impossible to pull out onto the main village roadway without edging forward. Although there is a speed restriction in the village, there have been occasions when I realized, nearly too late, that there was another vehicle bearing down on this junction from the right.</p> <p>Life, in Bakers Furlong, are to suffer the proposed development of 54 houses, it will more than obvious that the present difficulties, inadequacies and risks associated with access will increase nearly three-fold.</p> <p>2. We and the Herefordshire Council have long been aware of the present limited capacity of Burghill's main sewerage system, highlighted by a major blockage, when a number of properties at the lower end of Bakers Furlong were affected. We are seeing a current development of 24 houses opposite Burghill Golf Club and, as far as we know, no improvements to the sewerage system have been made. A further 54 houses is likely to compound the issue and should be a major concern to the design and planning authorities, from a health and safety point of view as well as from the possibility of future litigation.</p> <p>3. There is a public right of way from the far end of Bakers Furlong through the orchard to the north west and to the south east. This must be protected.</p>		

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		<p>4. I am concerned about the increasing urbanization of our villages in general and of Burghill in particular. A development of 54 houses, together with a number of other proposals, in a village of the size of Burghill can only be described as large scale and therefore detrimental to the amenity. In addition, we have a green area between Bakers Furlong and Leasown, which is a Protected Open Space and must remain so. In general, it is our duty to protect our environment, not allow others to destroy it.</p> <p>5. [a] It appears that in the current housebuilding frenzy, no planner appears to have given any thought to the resulting transport infrastructure problems. Increased housing, wherever it is, leads to increased need for transport. If this proposal is approved, we will see an increased usage of cars of at least three times or more of that at present in Bakers Furlong, given that many households now own more than one car. In addition, the condition of the roads from Burghill into Hereford are, to put it kindly, poor, with many potholes, (most of them neatly marked in white). Many other roads in and around the city are in desperate need of repair. It follows that the condition of our roads will continue to deteriorate, at the present inadequate level of maintenance and with increased traffic from villages such as ours, if this trend for greatly increased housing continues.</p> <p>5. (b) The proposed increases for housing in and around Burghill will contribute to the worrying problem of access to the city. The roads in and out of the city are gridlocked at certain times even now. No new roads are planned, as far as we know, and it is difficult to see how the existing road system will cope with the traffic increases resulting from Burghill's and other proposed building intentions.</p> <p>I trust the foregoing will assist toward bringing a sensible outcome to the deliberations regarding this proposal and that the final plan will honestly reflect the desires and concerns of the people of this village.</p>		
52	Sara Turner-Jones	<p>It was good to see the site assessment report has been revisited and amended for details and information which has come to light since it was originally written. I do not wish this to be yet another complaint and my points herewith are solely made to clarify the position from an ordinary parishioner (with no expert knowledge), who has been trying to research and comprehend the massive number of documents and information in relation to the NDP.</p> <p>After reviewing the updated site assessment report prepared by Kirkwells in March 2017 and being a resident directly adjacent to one</p>	Comments noted	No further changes

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		<p>of the sites in the report, I feel it important to make comment and observations as invited to do.</p> <p>Naturally living where I do, the sites at Lower Burlton are my immediate concern as these would have such a huge impact on my property and surroundings. However, the concerns that I have could possibly be applied to various other sites in the BNDP.</p> <p>1) It would seem that many of the sites in the report previously favoured as the best sites for development and scored very low, have now been reassessed and scored considerably higher. Given the potential for many of these sites to become totally undevelopable surely serious consideration should now be given as to whether they actually remain as part of the BNDP. There would seem little point including questionable sites in any NDP, if they are subsequently turned down by planners they only totally distort the figures, predictions and aims of the plan.</p> <p>It is also concerning that the scores are so drastically different to the original figures and only seem to have been revisited after issues have been raised by the Planning department.</p> <p>Many of these issues were raised by local residents when the draft plan was drawn up, and could have easily been investigated and researched at that time, prior to the submission of the final plan. Are we going to see this situation time and again as sites come before the Planning Department, surely all parishioners' concerns should be taken on board and looked into to see if there are actually any legitimate reasons for concern. This can only save time and money in the long run for all parties affected.</p> <p>2) With the recent government changes meaning any sites included in the NDP will automatically receive Planning Permission in Principle it is surely imperative that the Parish Council ensures only realistic, viable and acceptable sites are included in the plan. There will be no going back when the plan is finalised and approved, so for the sake of the Parish it needs to be accepted by the Parish.</p> <p>3) I would make the following observations in relation to the site analysis report in respect of Lower Burlton site 2B: -</p> <p>a) Previous use of the site should surely mention it's use as a Quarry rather than grassland, and as is later mentioned in the analysis. Although this use is very historic, the varied makeup of the soil shows that past use as a quarry is still evident.</p> <p>b) The analysis states pedestrian access to the site from the A4103. This access is a private lane owned by a third party and the site has</p>	<p>The Site Assessment forms part of the allocation process, it is for the Parish Council to use this information as part of the process, in deciding which sites go forward into the next version of the Neighbourhood Plan</p> <p>Under the new legislation, the answer is yes. However, this appears to be similar to an outline permission with all matters reserved, not an out and out grant of permission. Comments noted</p>	

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		<p>a right of access to the land for its current use. There is no public access to the site, and including the private drive of another property as pedestrian access for the development would seem misleading and presumptuous.</p> <p>c) I think it should be noted that unless and even if an access for this site can be established on to the Canon Pyon road A4110 (which is highly doubtful), this site represents backland development to those houses fronting on to Roman Road. These houses will lose all green space and privacy from all vantage points., regardless of the fact that one boundary of the site runs parallel to the road.</p> <p>d) The site assessment states potential for 21 houses. Whilst the size of the plot may indicate this number, it would seem unrealistic given the lay and makeup of the land. Outline planning was sought for just 10 houses, a vast discrepancy. If potential and actual development numbers are likely to vary so much isn't there a risk the BNDP could totally mislead and even fail to deliver with this and other such sites.</p> <p>e) All site scores at Lower Burlton have increased significantly enough to question whether any should be included in the BNDP. When outline planning was sought for site 2B the planning officer raised many concerns and the application was subsequently withdrawn. The third paragraph from the close of her letter to the developer/agent states she was not confident that the issues raised could be overcome. Surely this is an indication of an unsuitable site for the BNDP.</p> <p>f) As site report for 2C states it only suitable if site 2B came forward (due to access constraints), surely this site should also be considered for withdrawal from the BNDP, it is too dependent on an already questionable site.</p> <p>g) Whilst comments on a possible site access for site 2B from the Canon Pyon Road A4110 recognise height differences, loss of trees and hedgerows and visibility issues, there seems no mention of the impact this would have on local traffic. At peak times traffic travelling into the city (north to south), often is queued back past the White Roses entrance, how would vehicles manage to leave the site and join the main road? Consideration needs to be given to the impact on traffic flows and whether any further capacity can be safely added to already busy routes.</p> <p>4) Given the amount of time that has now passed since the BNDP was first embarked upon, it would seem sensible for it to be amended</p>	<p>Comments noted</p> <p>Comments noted</p> <p>Comments noted. The potential capacity is based on Herefordshire's density calculations.</p> <p>The Site Assessment forms part of the allocation process, it is for the Parish Council to use this information as part of the process, in deciding which sites go forward into the next version of the Neighbourhood Plan. Comments noted</p> <p>Comments noted. The capacity of the road network is a matter for the highway authority to assess. No adverse comments have been received in any formal consultation.</p> <p>Comments noted</p>	

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		<p>to take into account and include those houses and developments in the community already completed or given planning approval as indicated by Kirkwells assessment report. These could count considerably towards the Parishes target of housing growth, and it is unlikely any parishioners' want to see overdevelopment of our beautiful parish. Lower Burlton runs the risk of being incorporated into the city if all development went ahead. It would cease to be the boundary of the parish and how long before this extended further, slowly creeping towards St Marys. Surely the Parish boundary should be protected so that our Parish does not diminish in size, and a clear distinction between city and village is kept.</p> <p>5) I do not feel that large developments and mini estates are in keeping with our parish, and feel that Pye Finch and the Lower Burlton developments underway and forth coming are more than enough of larger development for the area. Smaller projects would surely be more in keeping and acceptable by most. This Parish is sought after by purchasers for the fact it is not overdeveloped, still has a sense of community and a great deal of greenspace. It is important no individual area is overdeveloped and projects are spaced throughout the community.</p> <p>The volume of sites put forward in Tillington around Trimstone Garage and The Bell are also way out of proportion and concentrated in one area which would totally change the landscape of that area forever. Again, there would be traffic concerns on a stretch of road that is currently restricted with limited visibility with a hill from the School and a second incline down towards The Bell.</p> <p>6) Perhaps it is time for further questionnaires to all Parishioners. It is only as the BNDP has progressed that people fully understand the impact on them and to the community. It is likely that many views have changed and would now be made in a more informed way. Consultation is always difficult and time consuming but it is of utmost importance if everyone in the Parish is to feel heard and considered. What a shame Kirkwells did not consult with residents adjacent to proposed sites, as I believe may have been suggested at a Steering Group meeting. Yes, there will be personal grievances to sort through but it is also a source of a wealth of local site information which is unlikely to be volunteered by developers and their agents. It does seem a waste of an opportunity for free information.</p> <p>The site assessment report at paragraph 3.2 states the reassessment has been carried out with additional information on deliverability</p>	<p>Comments noted</p> <p>Comments noted</p> <p>Comments noted</p> <p>The Site Assessment is an evidenced desk top exercise, which forms part of the process, this is supplemented by local knowledge when the actual site selection by the Parish Council takes place. Comments noted</p>	

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		<p>informal visits many issues and concerns could be investigated and addressed in the early stages which ultimately only saves time and money in the long run.</p> <p>My reason for this letter and making these points, is that the NDP seems to have got far too heated and as a result common sense seems to be lacking. Everyone's opinion is important no matter how trivial it may seem to some, we all put a great deal of time and money into our properties and most people will naturally defend this if it is put at risk.</p> <p>There is a very long way to go with the NDP and there are likely to be objections to every site by those in the immediate location. Alleviating concerns and listening at the earliest opportunity is essential to make the BNDP work and be accepted by Parishioners. Currently many individuals are put off getting involved when past response to issues has been very unwelcome.</p> <p>As a 4th generation of my family in this Parish dating back almost 100 years, I have always been very proud to say that I live here and I had hoped to remain for the rest of my days. Unfortunately, the recent climate surrounding the BNDP is making me question whether I would want to remain in the Parish if a lot of these developments went ahead.</p> <p>I am sorry if this letter seems a little lengthy but I hope that I have got across some of an ordinary Parishioners concerns. Hopefully, we will not change the Parish beyond all recognition.</p>	Comments noted	
53	Andrew Turner-Jones	<p>My wife has already written a long and emotional letter regarding her concerns towards the BNDP and the updated site assessment. Whilst my views are very similar to hers, I understand that for both of our opinions to be considered, we must both put these to you separately. I will try to restrict this to a point by point letter with my main concerns.</p> <p>1) The proposed sites 2B and 2C at Lower Burlton should now seriously be considered for withdrawal from the BNDP. The vast upgrading in their scores, the Planning Officers letter in relation to site 2B, and the information from local residents all indicate it may never be a viable site for development. This site has historically been refused planning permission based on access concerns and restrictions, nothing has changed to make the site any more achievable.</p> <p>2) Surely it is only now sensible to amend the BNDP to include all Properties/sites that have been built or given planning consent since</p>	<p>Comments noted</p> <p>The Site Assessment is an evidenced desk top exercise, which forms part of the process, this is supplemented by local knowledge when the actual site selection by the Parish Council takes place.</p> <p>Comments noted</p> <p>The 50 houses at Roman Road were taken into account in the original</p>	No further changes

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		<p>the plan was originally embarked upon. The 50 houses at Roman Road would count towards our target growth considerably and with other similar sites we are almost there already. Why propose to develop the Parish over target? I do not feel many parishioners would want that. Continually loosing green space is not a good thing if we don't need to.</p> <p>3) The government changes that mean anything included in the NDP automatically receives Planning Permission in Principle are very concerning. The parish council should now think long and hard about all proposed sites and whether they are acceptable/viable. The last thing anyone wants is a parish full of developments that should never have been built but were, simply because they were part of the BNDP. A huge responsibility, I know, but never the less a very important one. At least if already permitted sites are included in the plan, there would be less of a burden on the Parish Council for such decisions.</p> <p>4) On reading the site assessment reports, I am concerned that kirkwells carried out no consultation with local residents around proposed sites. Yet they have used information provided by agents and developers. This seems a very one-sided way of approaching the assessments, as agents/developers are only going to provide information that works in their favour.</p> <p>5) Traffic implications around proposed sites do not seem to have played a part in the assessments, only whether an access can be achieved. Surely it is important to consider the impact of the volume of increased traffic in some areas. This is something that could drastically effect both existing and future residents and it is essential we do not encourage access ways that may prove to be dangerous.</p> <p>6) Communication with Parishioners has improved, but there still seems to be a group that are not being got across to. Some Parishioners are still unaware of proposed sites adjacent to their homes. Only a week ago I spoke to a resident from Hospital Houses that knew nothing about the proposed sites at 2A,2B and 2C which would directly affect him. Most ordinary Parishioners do not understand the vast number of documents that are now available. My wife and I have spent many hours downloading and reading pages and pages of information. Presenting many of our older and less informed residents with so much is just too much for them.</p> <p>7) Perhaps it is time for a new questionnaire to all Parishioners. You may well find views have changed considerably now that the true</p>	<p>figures even though permission had not been granted.</p> <p>Under the new legislation, the answer is yes. However, this appears to be similar to an outline permission with all matters reserved, not an out and out grant of permission.</p> <p>The Site Assessment is an evidenced desk top exercise, which forms part of the process, this is supplemented by local knowledge when the actual site selection by the Parish Council takes place. Comments noted. The capacity of the road network is a matter for the highway authority to assess. No adverse comments have been received in any formal consultation.</p> <p>Comments noted</p> <p>Comments noted</p>	

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		<p>implications are coming to light. The BNDP has taken several years to get to this stage and much has changed in that time.</p> <p>8} I feel that smaller projects are more in keeping with this community and we do not need any more large-scale developments. We run the risk of spoiling the Parish forever, and losing the village/city boundary, effectively shrinking our parish rather than adding to it. Hopefully revisiting the plan now and making amendments to it will improve the overall plan, and at least ensure Parishioners feel part of the decision process.</p>	Comments noted	
54	Mrs J Turner	<p>I have lived in this Parish for nearly sixty years and feel that I should comment on the recently updated site assessment report for the BNDP. As you will no doubt be aware many of the parish have received a letter from concerned members of the public regarding the BNDP. The letter and the figures contained in it do raise some very valid points and concerns which I do feel the Parish Council should take on board. I have yet to meet a Parishioner that is fully in favour of the BNDP as it stands.</p> <p>Being an older member of the community I have found it difficult to fully understand all of the lengthy documents that relate to the NDP and have had to rely on my children to down load and explain things to me as at 79 I am not fully computer literate. My late husband served on the Parish Council for many years, so I do understand the time and commitments involved by the council members. However, it does seem that parishioner's opinions are not fully being considered and the plan runs the risk of being rail roaded through in its present form.</p> <p>I would like the Parish Council to seriously consider amending the BNDP for: -</p> <p>A) Inclusion of all properties and sites approved since the original draft was drawn up. The village would achieve a large proportion of its target growth if this was done. Nobody wants over development in the Parish.</p> <p>B) To remove all high scoring, difficult and unrealistic sites from the plan. The concern being that their inclusion could automatically give these sites Planning Permission in Principle, which may well be regrettable at a later stage.</p> <p>C) To look at the location of the proposed sites and the density of proposals in those areas.</p> <p>Areas in Tillington around Trimstone Garage and at Lower Burlton are over proposed and would spoil the existing areas and</p>	All comments noted. See previous responses	No further changes

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		<p>surroundings forever. Any further developments need to be spaced evenly throughout the Parish. Large projects are not really in keeping with what these areas have traditionally been.</p> <p>Possibly more consultation needs to be undertaken. Yes, this is hard work and takes time but the Parish needs to get this right if we don't want to start losing members of our community to other areas. My late husband was a councillor at a time when visits were made to all affected residents for all planning proposals. It was time consuming and difficult but at least everyone felt heard regardless of the outcome. I do hope a more acceptable plan can be achieved for the residents of this Parish, and that views will now be considered with the attention that they deserve. We do all have to live in the community after all these changes have taken place.</p>		
55	Mr & Mrs Repton	<p>We wish to express our concerns regarding the proposed building of 54 houses at Site 35, to the east of Bakers Furlong, and that these concerns are taken seriously into account prior to the approval of the final draft of Burghill Neighbourhood Development Plan.</p> <p>The main issues that we wish to raise concern are the mains water pressure, the already inadequate mains sewage system and the substandard junction into Bakers Furlong. We live near the end of the existing mains water supply and the water pressure is already compromised at certain times causing poor hot water flow particularly when taking a shower or bath, any additional demand on the water supply would no doubt increase this problem to us and neighbouring properties.</p> <p>We were informed that the plans for the 24 houses under construction opposite Burghill Valley Golf Club had to be revised as the main sewage system, in Burghill, would be unable to cope with the additional sewage from these houses. An additional 54 dwellings would no doubt create even more problems.</p> <p>The road junction visibility into and out of Bakers Furlong is already restricted by high hedges to the left and right, if vehicles are parked outside Pye Finch cottage then negotiating the junction is further compromised, dangerous and increasing the risk of an accident.</p> <p>With the additional 54 houses and the potential for at least an extra 108 vehicles serving the dwellings and apart from any building site traffic during the development, including the mess site traffic inevitably creates, the dangers can only but increase.</p> <p>We were of the understanding that the required percentage of building development and expansion of Burghill had already been</p>	Comments noted. See all responses to Bakers Furlong issues.	No further changes

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		met and that further expansion to building developments would be unnecessary. We hope our concerns are respected and that due thought is made to reject this development.		
56	Mrs Jenkins	I have been a parishioner of Redstone for 62 years and I feel that if Hereford Council has accepted 18% increase to our community I think that this percentage is more than adequate; the other proposal by the parish council of up to another 60 dwellings is too much for this community. <ul style="list-style-type: none"> • Why can we not go with what Hereford council have accepted? And why are you saying we could do more without consulting the residents it will ultimately affect? • As this is a Parish matter why wasn't this put in the parish magazine? As some residence do not have access to a computer/internet for such an important which affect all residents 	Comments noted. A number of consultations have taken place as part of the Neighbourhood Plan Process, including the initial Options Days consultations, the Regulation 14 consultation, the Regulation 16 consultation and this consultation on the Site Assessment reports. There have also been regular updates in the Parish Magazine	No change
57	Mrs G Roberts	I am writing to comment on the updated site Assessment Report for a revised version of the Burghill Neighbourhood Development Plan. I noted that the required number of dwellings to meet our parish requirement is 25. I understand that since the report was written more planning applications have been granted and that the target of 25 dwellings would be reached well within the time framework (2031) because of further allowable windfalls. I would suggest therefore that further sites for development are NOT needed. In addition to this I would like to make the point that in my view the Tillington sites Nos 25,22, and 10 which are mentioned on page 13 are not suitable for development for the main reason that there is no safe access to them. Having lived in this village for 34 years and regularly walked and driven along the road past these suggested plots I know that it is already a dangerous road with a dangerous bend. Access and visibility splays cannot have been adequately assessed. In conclusion we do not need further expansion - having provided for the Herefordshire Council requirements. There are other ways to supply adequate housing in the county and the country. The rural countryside must be protected for future generations.	Comments noted. The 18% target for Burghill Parish is identified through the Herefordshire Local Plan Core Strategy amounting to a minimum target of 124 dwellings. To date planning commitments total 106 dwellings resulting in a balance of 18 dwellings. In order to be in general conformity with the Local Plan Core Strategy, the NDP should identify the target number of dwellings to come forward in the plan period. The Site Assessment is an evidenced desk top exercise, which forms part of the process, this is supplemented by local knowledge when the actual site selection by the Parish Council takes place. Comments noted. The capacity of the road network is a matter for the highway authority to assess. No adverse comments have been received in any formal consultation.	No change


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58	A Smith	<p>I am writing in relation to site reference 35 land to the east of Bakers furlong, Burghill, and would be grateful if you would take the comments mentioned into account before the final draft of the Burghill Neighbourhood Development Plan being approved.</p> <p>At present Bakers Furlong supports 30 properties, and I feel that there are safety issues at the junction to our road currently without the proposed additional 54 dwellings. The splay gives very poor visibility and with people parking on the main road this forces vehicles over the junction.</p> <p>Over the years there has been sewage problems in the main village and with the 24 houses currently being built on the site opposite Burghill Golf Club will only lead to more existing problems. The main sewer in the village was near capacity many years ago and since then there has been housing growth in our village so I would have thought the current houses being built will add to this problem.</p> <p>With regard to where the proposed 54 new properties would be constructed this is in very beautiful orchards and the well-used public right of way. I feel that further housing should only be on brown field sites and small clusters evenly spread around the parish, so that the character of this very beautiful village is protected.</p>	Comments noted. See all previous responses to Bakers Furlong issues.	No further changes
59	Mrs Alison Fenton	<p>With reference to the above independent assessment which has been produced for the Parish Council following the return of the Neighbourhood Development Plan, by Herefordshire Council at the first Regulation 16 stage, I would ask that the following comments/points are taken into account.</p> <p>The communication from Herefordshire Council suggested that the 50 houses granted planning permission on Roman Road/Tillington Road could be counted towards the numbers required to make up the 18% minimum target growth. It also stated concerns regarding lack of consultation and deliverability of some sites as demonstrated by the outcome of a recent planning application. (a reference to site 2B). The matter of the 50 houses was dismissed with (as it subsequently became clear) inaccurate- but tantalisingly close – information, which found its way into the “official report” in the Parish Magazine.</p> <p>Para1.3 The Option Day (Nov 2014) prominently displayed the site which the Steering Group had, I believe, by then, selected as preferable, though the remainder, with the exception of White Roses (a late submission) were viewable and residents were asked to indicate preferences regarding the sites. I am led to believe that any</p>	<p>Comments noted</p> <p>The 50 houses were taken into account in the total numbers.</p>	No change

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		<p>neutral responses were added to the positive, rather than being ignored.</p> <p>Para 2.4 – I would agree that the Parish Council is required to find in the region of 123 new dwellings but believe that this number has now been attained with up-to-date planning commitments including the previously mentioned 50.</p> <p>Paras 3.1 & 3.3 (as amended) – Although the Parish Council was advised that this re-assessment would be inclusive of all sites it would appear that this is not the case. It is also stated that Lower Burlton sites will be assessed on different criteria. I would point out that several of the rejected sites in Burghill village and Tillington are equal in proximity to a shop and public house and critically some of those in Burghill village would also appear to be closer to main sewerage than some of the “preferred” sites at Lower Burlton.</p> <p>Para 3.3 – Although initial selection of sites, in relation to flood risk, may have been based on Environment Agency maps, I believe Herefordshire Council identified the risk regarding the previously mentioned planning application on Site 2B. It is interesting to note that this section includes a clarification of the aforementioned Herefordshire Council term “deliverability” though it is unclear whether this is Kirkwells definition. It also explains “developability which encompasses viability” a subject I raised at the November Parish Council meeting.</p> <p>Para 3.5 – I cannot comment on other sites but believe that as only part of the White Roses site is visible from the public highway or adjoining fields, any assessment is based on supposition and conjecture as neither Kirkwells nor any member of the Steering group or Parish Council has ever visited the whole site. The scoring system used is somewhat questionable in that it relies on the adding up of points in relation to different criteria some of which I believe would be more significant than others</p> <p>Appendix/Site Analysis sheets – Others no doubt will comment on sites in Burghill village and Tillington of which I only have some knowledge.</p> <p>I am aware of the reason Site 2A is not included in the Neighbourhood Development Plan.</p> <p>No doubt the registered owners of the “pedestrian access” referred to in the re-assessment of site 2B will be submitting their own comments as will the beneficiaries of the encumbrances on this site.</p> <p>The original 6-10 years achievability has been re-assessed to 11-14</p>		

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		<p>preference for their sites, whereas the use of the term awareness as regards to comments made at Regulation 14 and the first Regulation 16 consultation which included objections, would suggest that these were regarded with caution, as this is the dictionary definition of the word.</p>		
60	CR Planning Solutions	<p>Re Land adjacent to Bredstone House, Burghill Burghill Neighbourhood Development Plan (NDP) It was good to talk with you yesterday and as agreed I enclose details of a deliverable housing site which is available now for inclusion within the Burghill NDP to help meet the housing needs of the area. The contained site lies to the west of Bredstone House and is well related to the built form and facilities of the sustainable settlement of Burghill. Please see the accompanying site location plan. The site is in the ownership and control of Mr and Mrs Reid who live at Bredstone House and is surplus to their requirements. The site is therefore available now for residential development. As you will see from the accompanying submission Mr and Mrs Reid have undertaken technical work to ensure that the site is a deliverable site. Highway matters continue to be addressed, however, given the positive discussions which have been undertaken to date Mr and Mrs Reid are now in a position to promote this site with confidence as a suitable, available and achievable housing site for inclusion within the NDP. The site was presented to the Parish Council at its meeting on 12th July 2017 and as advised I am now forwarding details of the site for your review and assessment. Please do not hesitate to contact me if you require any further information. I will also keep you updated with the ongoing discussions with Herefordshire Highways with regards to the proposed highway improvements which will be delivered as a result of this scheme.</p>	<p>Comments noted.</p> <p>The deadline has passed for the submission of sites. This is submitted very late in the process and has not been included in any consultations in the last three years.</p>	No change.
61a	CR planning Solutions	<p>Proposed Residential Development Site Land adjacent to Bredstone House, Burghill • Land adjacent to Bredstone House, Burghill forms a 0.96 ha site which is well related to the built form and facilities of Burghill. The site is adjoined by the residential property of Bredstone House to the east, the C1103 and adjoining residential properties of Redstone and Manor Fields to the south and the Burghill Golf Course to the north and west. A location plan accompanies this submission.</p>	<p>Comments noted.</p> <p>The deadline has passed for the submission of sites. This is submitted very late in the process and has not been included in any consultations in the last three years.</p>	No change.

Ref. No.	Consultee Name	Comments received	Kirkwells Comments	Amendments to SAR
		<ul style="list-style-type: none"> • This greenfield site is generally flat and forms pasture land. Mature trees and hedging align the site boundaries ensuring a well contained site. A public right of way traverses the site in a north/south direction. • The land is in the ownership and control of Mr and Mrs Reid of Bredstone House. The site is surplus to their requirements and is available now for a small, well designed residential development of between 10 -15 dwellings for inclusion as a housing allocation within the Burghill NDP. • Before promoting the site to the NDP, Mr and Mrs Reid wanted to be satisfied that the site was deliverable. As such they entered into pre-application discussions with Herefordshire Council in October 2016. A response was received in January 2017 which identified highway matters which needed further investigation. • As such Mr and Mrs Reid have appointed a transport consultant who prepared access proposals for the site which were submitted to Herefordshire Council early in the year. Unfortunately, it has taken sometime to receive a response, however, positive discussions are now taking place. These discussions are ongoing with regards to agreeing the detail, however, following a recent site meeting held on 5 July 2017 there appears to be a verbal in principle agreement to the access proposed to serve the site, in addition to part widening of the lane fronting the site to allow two vehicles to pass, where currently it is a single-track road. • In addition, Herefordshire Highways are seeking a junction improvement to the lane to the east of the site with the main road running past the golf club. This is currently being looked at by the transport consultant and once prepared will be sent to Herefordshire Highways for their review. A potential improvement scheme at this junction should provide enhanced safety and provide a real benefit when accessing the village. • Given the work that has been undertaken over the last year this site is being put forward as a sustainable site with no known technical matters which would prevent its delivery as a housing site and is available now to help meet the housing needs of the area. • As such, Mr and Mrs Reid would like to put this site forward as a housing allocation for inclusion within the NDP for the Parish. • The site offers the following benefits: <ul style="list-style-type: none"> ➤ The potential to deliver a low density, sensitive, residential scheme incorporating a mix of dwellings to meet local housing requirements 		

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		<p>along with associated open space provision which complements its edge of village location.</p> <ul style="list-style-type: none"> ➤ The proposal has the potential to deliver a safe access into the site, with localised widening of the lane fronting the site, as well as a highway junction improvement to the east of the site which would benefit the wider community. ➤ The proposal seeks to retain the Public Right of Way (PROW) which crosses the site. The PROW network provides a pedestrian access from the site to the village school allowing future residents to access the school on foot. ➤ This proposal will seek to retain and strengthen existing landscaped boundaries as part of a future proposal offering biodiversity improvements. ➤ The site is located within Flood Zone 1 as defined by the Environment Agency: an area of low probability for fluvial flood. ➤ It is understood that mains water, electricity, gas and telephone connections are all available in the vicinity of the site, serving the existing surrounding dwellings. ➤ The site will seek to deliver well designed dwellings constructed to the highest sustainable standards to reduce energy consumption and maximise energy conservation. 		

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61b	CR planning Solutions		<p>Comments noted.</p> <p>The deadline has passed for the submission of sites. This is submitted very late in the process and has not been included in any consultations in the last three years.</p>	No change.
62	Mrs P Downes	<p>Having recently received a very explicit paper about our NDP I write as a concerned villager.</p> <p>We are wondering why our Parish Council appears to think we need to have more new housing than the 18% already over achieved.</p> <p>Members of the Parish Council should be all local parishioners who, I would think would be wanting the best for our people and this place.</p> <p>This appears not to be the case over our NDP. No doubt there must be a good explanation. I look forward to hearing from you on this matter.</p>	<p>Comments noted. The 18% target for Burghill Parish is identified through the Herefordshire Local Plan Core Strategy amounting to a minimum target of 124 dwellings. To date planning commitments total 106 dwellings resulting in a balance of 18 dwellings. In order to be in general conformity with the Local Plan Core Strategy, the NDP should identify the target number of dwellings to come forward in the plan period.</p>	No change

Anonymous letter sent to parishioners

Dear Fellow Parishioners

Currently options for the Parish's Neighbourhood Development Plan (NDP) are being presented in one way only by the Parish Council (PC) that has excluded involvement from the community. Therefore, in the interests of balance and because Parishioners have a right to know, we would like to inform you that there is another option.

We are enclosing an article which we submitted to the Parish Magazine for June (but which the Editors refused to publish) trying to promote the fact that the Parish has already achieved the 18% target growth required by Herefordshire Council for the NDP.

The guidelines for the Neighbourhood Development Plan (NDP) require that the wider community is involved in the process, and that the parishioners' ideas and input are taken into account. Parishioners are also supposed to be kept closely in touch with developments, their responses listened to sympathetically, and subsequently, acted upon. This has not happened.

In 2013 the PC decided to do a NDP, the start was promising but there has been lack of proper consultation with the community about the NDP since late 2014. Astonishingly, there seem to be no published accounts on the PC website which reconcile NDP funding and expenditure, but analysis of Parish Council Minutes shows that £25,000 of public grants have been received, plus whatever the Parish Council has provided from the parishioners' money.

The Plan was rejected by Herefordshire Council (HC) in September 2016 due to lack of consultation and undeliverability of allocated sites. The PC has subsequently employed consultants at a further cost of £1,400 or more to re-assess the same sites. This 'Updated Sites Assessment Report' (currently being 'consulted' on) is no longer robust enough and this has been acknowledged by both Kirkwells (the consultants producing the document), and the Chairman of the Steering Group. This was discussed at the April 2017 PC meeting. Strangely the PC initiated and approved this extra work on 16 November 2016 at a time when it was known that the Parish was only about 23 houses short of its 18% target of 124, and since then more houses have been given permission by Herefordshire Council outside of the Plan!

If the plan progresses with some or all of the 60 houses on mini-housing estates still included in it, in addition to the 126 (over-target 18% housing growth from already-given planning approvals and already-identified 'windfalls'**), then there is a major potential problem, because recent government changes mean that those extra 60 houses will be deemed as having 'Planning Permission in Principle'. For additional houses which are not needed!
*(** 'windfalls' are sites which might not have been previously known, sites for single dwellings, changes in existing planning permissions or conversions to existing buildings)*

Concerned parishioners have been trying to persuade the PC that the NDP which they are continuing to pursue is unnecessary. But sadly the PC will not listen. The Steering Group has done the background work which no-one else was prepared to do, and they deserve credit for that. However, all through this process, the PC has failed to properly consult with the community so that the plan might become 'owned' by the people of this Parish. This was one reason Herefordshire Council rejected the PC's plan. And now once again, the PC and SG do not wish to make any changes to their plan or to go back and consult with the Parish, to establish if the community really wants more houses than are necessary, as the consultants themselves have recommended.

We, as concerned parishioners have tried to put an article in the June Parish Magazine, responding to the Parish Council's own bulletins which are asking for comments on these pointless site assessments by the end of June. But, sadly, the Parish Magazine would not publish it unless it was delayed by a month to allow the PC to respond to our article by which time it will be too late! Therefore we have taken this step of informing parishioners directly, at our own cost.

The inclusion of unnecessary sites will affect you and is totally unnecessary with a considerable detrimental impact on the Parish. The Parish Council has not informed you of this fact; instead stubbornly pursuing unnecessary development, which will change the landscape of our Parish irrevocably.

The alternatives are:

1. **what we are proposing**, 126 (perhaps including one or two more by the time this plan is finished) houses/conversions which have **already been built or given planning approval, plus already-identified 'windfalls'**, based on 18% growth, meeting the HC target. And Herefordshire Council has stated that a plan like this would be acceptable,
2. what the PC has embarked on, which could be up to 60 houses on mini-housing estates, on top of the 126 in option 1 above. That would be up to 27% growth.
3. abandon the NDP (or have it rejected again due to the lack of consultation and undeliverability of sites), in which case there will truly be a development free-for-all,
4. or let HC take over, and impose their own definition of a minimum 18% growth on the Parish.

The 25 affordable houses already provided within the existing planning permissions, far exceed the demand for 14 social housing units identified in the most recent affordable housing survey.

You, like us, may wonder what on earth is going on. As a group we have endeavoured to represent the community and correct the course the Parish Council seems stubbornly determined to proceed with. You have been excluded when you should have been informed. Therefore, we need your help in bringing some kind of sanity back to this process that will involve all of us in the decision-making process and not just the PC and Steering Group deciding what they feel is right for us. Please we urge you to write to Mrs Paulette Scholes, Clerk to the Parish Council, Willow House, Burghill, Hereford HR4 7RE or email: burghillpc@btinternet.com to make your views clear before the end of June. (If you leave it until after June, when the 'consultation' on the extra housing sites has finished, the Parish Council may have an excuse to ignore your views.)

We are going to put information on a website now that it seems the Parish Magazine is denied to us! That website is at <http://commonsenseNDP.mypressonline.com>, please make a note of it and visit it for the information which you are not being given by the Parish Council.

*with regards from a concerned group of parishioners
June 2017*

Too Many Extra Houses in Burghill Parish 2011 – 2031

2013: 120+ more houses demanded for Burghill Parish (18% increase) by Herefordshire Council

2014: Parish Council Questionnaire about public opinion –

- 56% of Burghill Parish said an 18% housing increase was too much
- 64% of Burghill Parish said that 10% or less might be acceptable
- ONLY 2% of Burghill Parish said that more than 18% would be acceptable

2016: Burghill Parish's Neighbourhood Development Plan (NDP) **REJECTED** by Herefordshire Council due to **UNDELIVERABILITY OF SITES** and **LACK OF CONSULTATION WITH THE PUBLIC**

Meanwhile 2011 – 2017 the 18% TARGET INCREASE HAS ALREADY BEEN ACHIEVED:

23	Planning Permissions as at April 2016 according to Herefordshire Council
24	Houses at Pyefinch given Planning Permission
50	Houses at Roman Road/Tillington Road given Planning Permission
10	More barn conversions and individual plots/houses have gained planning permission since April 2016, mainly at Tillington
= 107	Total of new homes approved (including 25 affordable homes)
+ 19	'Windfalls**' allowance already identified in the Draft Neighbourhood Plan
= 126	18% MINIMUM TARGET INCREASE ALREADY ACHIEVED (18% = 124)

** Windfalls** are sites which have been previously approved for development, but which have not been developed, or which have been developed but are not yet occupied.

WE DO NOT NEED THE PARISH COUNCIL'S EXPENSIVE SITE ASSESSMENT REPORT CURRENTLY BEING 'CONSULTED' ON.

WE DO NOT NEED THE MINI-HOUSING ESTATES IN THE DRAFT PLAN.

SO LET'S CHANGE IT:

- Let us remove the superfluous 60 or so houses on mini-housing estates still in the Draft Plan.
- Let us have a Plan which is simply based on the Planning Permissions already granted, plus the windfall allowance, which Herefordshire Council itself has said is allowable (this 'windfall' allowance could be increased to include other single plots which were submitted to the NDP but ignored and not included – there were some at Tillington Common put forward by local people).

BUT WE DO STILL NEED A NEIGHBOURHOOD PLAN.

If we don't have an NDP, Herefordshire Council will take over and might impose even more housing on us in its own Rural Development Plan for Parishes.

DON'T LET THAT HAPPEN, LET PARISHIONERS KEEP CONTROL.

CHANGE THE DRAFT NDP, IT ONLY NEEDS SOME SIMPLE CHANGES TO REFLECT WHAT HAS ALREADY HAPPENED!!

If you do not write, email, telephone or participate in a meeting, the Parish Council will presume that you give your implicit approval to the mini-housing estates in the Draft NDP which **WE DO NOT NEED.**

You need to tell the Parish Council what you think, NOW. If you support our proposal of a NDP which only contains sites which already have planning approval plus a provision for 'windfalls', then please tell them!

Write to Mrs Paulette Scholes, Clerk of the Parish Council, Willow House, Burghill, Hereford HR4 7RE or email: burghillpc@btinternet.com

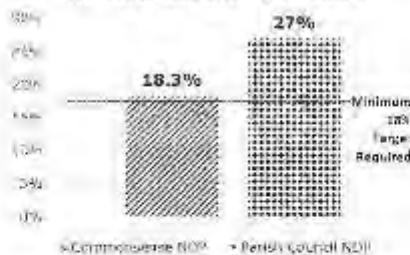
Published in the West of England by a consortium of contributors

COMMONSENSE NEIGHBOURHOOD DEVELOPMENT PLAN (NDP)

FACTSHEET #1

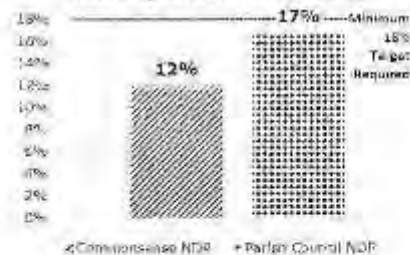
1. **FACT: BURGHILL VILLAGE HAS NOT GOT THE BRUNT OF THE NEW HOUSING**
2. **FACT: A COMMONSENSE NDP WOULD BE MORE PROPORTIONATE AND STILL MEET THE MINIMUM TARGET FOR THE PARISH**

Burghill Parish
Housing Growth 2011-2031



The target set by Herefordshire Council for the Parish is for a minimum 18% proportionate housing growth, equating to 124 houses between 2011 & 2031. A commonsense NDP easily achieves this by including **existing** Planning Permissions plus 'windfalls' which are already defined. However, the currently proposed Parish Council Plan adds up to a further 50 houses on non-housing estates, so that the growth far exceeds what is needed.

Burghill Village
Housing Growth 2011-2031



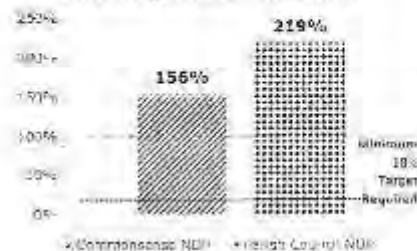
It is commonly believed that because of the PYE/NDP development, Burghill village is getting the bulk of the new housing. The reality is that Burghill village is receiving **disproportionately less** housing because other locations are having unnecessary development callously thrust upon them. In fact, under a 100% commonsense NDP for the Parish as a whole, Burghill village would receive even less development because it would not be necessary to include the Redstone site which is in the currently proposed Parish Council Plan.

Tillington & Tillington Common
Housing Growth 2011-2031



Tillington and Tillington Common are the more rural parts of the parish. Tillington was erroneously defined by Herefordshire Council as a growth village. By accident of history, the Whimore Cross end of Tillington has the Mill Inn, and some industrial units, so the Parish Council has decided to put 24 houses there, with inadequate consultation. Totally unnecessary, because under a commonsense NDP based on the Planning Permissions already granted plus 'windfalls' which are already defined, Tillington with Tillington Common easily achieve their proportionate 18% target.

Lower Burlton
Housing Growth 2011-2031



Self-evidently it is Lower Burlton that has already borne the brunt of the development. Planning Permission for 50 houses was granted by Herefordshire Council which has totally skewed the housing pattern. Nothing can be done about that now. However, the currently proposed Parish Council Plan still includes a **further** 23 houses on a site long earmarked for Lower Burlton. In contrast, a commonsense NDP would no longer require those, because it is based on Planning Permissions already granted plus 'windfalls' elsewhere in the Parish which are already defined.

Table 1: Recommended and Allocated Sites in Tillington

Site		Settlement Boundary / Existing built Form	Brownfield or Greenfield	Archaeological HER site	Trees and Hedgerows	Priority BAP	Views / Landscape Character	Contamination	Surface Water Flooding	Accessibility	Services	Access	Suitability	Deliverability	Total out of 13
Tillington Sites															
Site 10	Savills Comments	Agree	Agree	Agree	Agree	Agree	It cannot be concluded that development would have "no impact" it would have "minor impact".	Agree	Agree	Agree	Agree	Agree	Agree	Agree	
	Kirkwells Score	0.5	1	0.5	0.5	0.5	0	0.5	0	0	1	0.75	0.5	0.5	6.25
	Savills Score	0.5	1	0.5	0.5	0.5	0.5	0.5	0.5	0	0	1	0.75	0.5	0.5
Site 22	Savills Comments	Agree	Agree	Agree	Agree	Agree	Agree	Agree	Agree	Agree	Agree	Agree	Agree	Agree	
	Kirkwells Score	0.5	1	0	0.5	0	0.5	0.5	0	0	1	0.75	0.5	0.5	5.75
	Savills Score	0.5	1	0	0.5	0	0.5	0.5	0	0	1	0.75	0.5	0.5	5.75
Site 25	Savills Comments	This land is not surrounded by development on all side and should	Agree	Agree	Agree	Agree	Agree	Agree	Agree	Agree	Agree	Agree	Agree	Agree	

		therefore have the same score as sites 39 and 40.														
	Kirkwells Score	0	1	0	0.5	0	0	0.5	0	0	1	0.25	0.25	0.5	4	
	Savills Score	0.5	1	0	0.5	0	0	0.5	0	0	1	0.25	0.25	0.5	4.5	

Table 2: Recommended and Allocated Sites in Burghill

Site		Settlement Boundary / Existing built Form	Brownfield or Greenfield	Heritage Asset	Conservation Area	Archaeological HER site	Trees and Hedgerows	Priority BAP	Views / Landscape Character	Contamination	Surface Water Flooding	Accessibility	Services	Access	Suitability	Deliverability	Total out of 15
Burghill Sites																	
Site 21	Savills Comments	Agree	Agree	Agree	Agree	Agree	Agree	Agree	The site is highly visible.	Agree	Agree	Agree	Agree	Agree	Agree	Agree	
	Kirkwell Score	0.5	1	0	0	0	1	0	0.5	0.5	0	0	1	0.75	0.5	0.5	6.25
	Savills Score	0.5	1	0	0	0	1	0	1	0.5	0	0	1	0.75	0.5	0.5	6.75

Table 3: Sites in Tillington submitted by Farmcare Ltd and assessed in the USAR

Site		Settlement Boundary / Existing built Form	Brownfield or Greenfield	Archaeological HER site	Trees and Hedgerows	Priority BAP	Views / Landscape Character	Contamination	Surface Water Flooding	Accessibility	Services	Access	Suitability	Deliverability	Total out of 13
Tillington Sites															
Site 39	Savills Comments	Agree	Agree	Agree	Agree	Agree	Development of the site would be read in conjunction with Cherry Orchard Cottages and is not highly prominent.	There is no evidence confirming that there is 'known' contamination	Agree	Agree	Agree	The site can be accessed via the creation of a road linking on to Cherry Orchard.	Only minor works are required to facilitate development of the site. No known major deliverability issues.		
	Kirkwells Score	0.5	1	0	0	0	1	0.5	0	0	1	0.75	1	1	6.75
	Savills Score	0.5	1	0	0	0	0.5	0.5	0	0	1	0.5	0.25	0	3.75
Site 40	Savills Comments	Agree	Agree	Agree	Agree	Agree	Development of the site would be read in conjunction with Cherry Orchard Cottages and is not	There is no evidence confirming that there is 'known' contamination	Agree	Agree	Agree	The site can be accessed via the creation of a road linking on to Cherry	Only minor works are required to facilitate development of the site. No known major deliverability issues.		

							highly prominent.					Orchard.			
	Kirkwells Score	0.5	1	0	0.5	0	1	0.5	0	0.5	1	0.75	0.5	1	7.25
	Savills Score	0.5	1	0	0.5	0	0.5	0	0	0.5	1	0.5	0.25	0	4.75
Site 41	Savills Comments	Agree	Agree	Agree	Agree	Agree	Development is enclosed on three sides by roads and will be read against the backdrop of development to the east.	There is no evidence confirming that there is 'known' contamination	Agree	Agree	Agree	Agree	Not as bad as assumed.	Agree	
	Kirkwells Score	1	1	0	1	0	1	1	0	0.5	1	0.75	1	0.5	8.75
	Savills Score	1	1	0	1	0	0.5	0	0	0.5	1	0.75	0.5	0.5	7.75

Table 4: Sites in Burghill submitted by Farmcare Ltd and assessed in the USAR

Site		Settlement Boundary / Existing built Form	Brownfield or Greenfield	Heritage Asset	Conservation Area	Archaeological HER site	Trees and Hedgerows	Priority BAP	Views / Landscape Character	Contamination	Surface Water Flooding	Accessibility	Services	Access	Suitability	Deliverability	Total out of 15
Burghill Sites																	
Site 34	Savills Comments	Agree	Agree	Agree	Agree	Agree	Loss of trees will be minimal.	Agree	Agree	Agree	Agree	Agree	Agree	Agree	Agree	Agree	
	Kirkwell Score	0.5	1	1	1	1	1	0	1	0.5	1	0.5	1	0.75	1	1	12.25
	Savills Score	0.5	1	1	1	1	0.5	0	1	0.5	1	0.5	1	0.75	0.5	0.5	10.75
Site 35	Savills Comments	Agree	Agree	Agree	Agree	Agree	Loss of trees will be minimal	Agree	Agree	Agree	Agree	Agree	Agree	Agree	Agree	Agree	
	Kirkwell Score	0.5	1	0	0	0.5	1	0	1	0.5	0.5	1	1	0.75	0.5	0.5	8.75
	Savills Score	0.5	1	0	0	0.5	0.5	0	1	0.5	0.5	1	1	0.75	0.5	0.5	8.25
Site 36	Savills Comments	Site is next to houses	Agree	Agree	Agree	Agree	Loss of trees will be minimal	Agree	Agree	Agree	Not a known issue.	Agree	Agree	Agree	Not as bad.	Agree	
	Kirkwell Score	1	1	0	0	0	1	0	1	0.5	1	1	1	0.75	1	0	9.25
	Savills Score	0.5	1	0	0	0	1	0	1	0.5	0.5	1	1	0.75	0.5	0	7.75

7.0 Final Updated Site Assessment Report Consultation

- 7.1 The Final Updated Site Assessment Report was approved by the Parish Council on 6th September 2017 for a further round of consultation to allow residents to inspect the final document and make any further comments.
- 7.2 This was published on the Parish Council website (Screenshots included in Appendix 34) and included in the parish magazine (Appendix 35).
- 7.3 Table 4 overleaf **includes the residents' comments to the consultation on the Final Updated Site Assessment Report**).
- 7.4 Following deliberations, the Parish Council agreed to proceed with a Neighbourhood Plan which includes the three highest scoring sites in the Final Updated Site Assessment Report.
- 7.5 A newsletter advising the updating residents is included in the December parish magazine (Appendix 36). Also included in Appendix 36 is the Neighbourhood Development Plan Opinion Page from the same edition of the parish magazine.

Table 4 – Comments from Residents on FUSAR

Name	Comments	Kirkwells Response
<p>1. A C & S J TURNER- JONES</p>	<p>We apologise for sending this letter on meeting day. However, as the USAR was only posted on the BPC website on Monday it has left little time for Parishioners to fully examine its contents.</p> <p>We were disappointed to note our letters were not included in the USAR comments and can see no reason for them being excluded. Having read the comments of others and again our own letters we do not feel there was anything defamatory or derogatory in them. In fact, we were conscious not to point fingers. Therefore, it does raise concerns of how many other letters have similarly been excluded and not taken into account.</p> <p>Due to the lack of time we have only been able to examine the reassessment of the site in our immediate vicinity B2.</p> <p>It would seem the scoring of the site has again been amended by reliance on information and reports supplied by the agent of the site.</p> <p>Unfortunately, what has not been considered is Herefordshire councils response to these reports. They found them concerning in areas and advised that further investigation would be required, they were not happy with many of the measurements taken in the transport statement.</p> <p>Why is this publicly available information which has such a bearing on the site not also been taken into account?</p> <p>Unfortunately, the example for this site and the disregarded views of Herefordshire Council in relation to it, just makes us wonder how many more sites in the plan have been treated in such a way and are the scorings anywhere near accurate.</p> <p>It is appreciated the BNDP is a matter that you all probably now want to put to bed. However, we thought that you should be made aware of missing letters and information not considered. The Parish has paid for a service from Kirkwells and you should be made aware of any short comings.</p>	<p>The initial response table sent to and published by the PC was an earlier version and not the final version. This has now been amended and the full comments published on line.</p> <p>The Site Assessment report was amended in line with relevant responses and additional information available at the time of writing.</p>
<p>2. Michael White</p>	<p>Having carefully read the many comments from the wider community on the USAR, it is very evident that there is great concern about the NDP as it stands. What is so annoying is that parishioners have tried and tried to show the PC that the Plan is disproportionate, that there were flaws from the beginning in how it was set up and that there were considerable failings in bringing in the wider community for involvement on a regular basis.</p> <p>The HC obviously saw that this latter failing was true and rejected the plan. There is no sign that this has been improved upon since the Plan was rejected. In fact, I think it could be said to have been worse since the rejection in August 2016. Was</p>	<p>The report re-assesses the sites put forward throughout the process and gives some guidance for the Parish Council/ Steering group (as was) as to the suitability of proposed sites for future allocation in the Neighbourhood Plan.</p>

	<p>a meeting called for the public to come in and discuss the sites which were 'undeliverable'? No, not at all! No involvement with the wider community on this most important point! So, who made the decisions? What changes were made? Why wasn't the public consulted and involved in making those decisions? 'Consultation' in this NDP has been nothing more than "Here's what we've decided.... tell us what you think" And when we put in our comments, the end result is 'No change'. Had the PC (via the SG) had the decency to study the comments made by the public in the Reg 14, and then react positively, the chances of including 'undeliverable sites' would have been avoided.</p> <p>So WHY has the wider community been kept at bay after the initial excitement of open days and a flawed system of voting on sites? Well, many people know why.....and probably many PC members know why! We have ended up with a Plan which is not "By the residents for the residents" but simply "by the few.....for developers". And the PC seems to be happy with that!</p> <p>You could have (still can?) avoided the strong chances that we are going to end up with mini-Bobblestocks. We need extra housing. Agreed, but for some time the SG were not wanting to count windfalls!.....and you let them do it! Had the PC been 'on the ball' throughout the three years you could have had a Plan as per the flyer sent out by those naughty people. In other words, a Plan which could almost be sure of not having mini-Bobblestocks in the parish. You needed to be a brake on a runaway train! We have had a train crash, and far too late in the day, some very searching questions will eventually be asked. Why was it allowed to happen? You are asking for comments on the updated (final) version of the SAR.</p> <p>So, will that be it? What will you do with the responses/comments/objections? We've seen the PC's responses to parishioners comments in the past. More or less ignored...so what's the point of this exercise? "Yet another example of how we consulted the parishioners".....Right! I hope HC are impressed!</p> <p>There is so much more I could add but as it is mostly water off a duck's back and will be largely of no consequence, I will leave you with my thoughts above.</p>	<p>The USAR forms part of the process of site allocation. It gives a desktop evaluation of sites. It is for the Parish Council to use this information together with identified and justified local knowledge to select the sites for allocation in the Neighbourhood Plan.</p>
<p>3. Dr. F. and Mrs. C. Shallcross</p>	<p>We are away on holiday from 5th- 16th October and therefore are unable to visit the Simpson Hall to see the documents on display.</p> <p>We should like comment on the Site Analysis on Page 34 and 35, site reference Site 1 C, the land between Haymeadow Farm and Home Farm.</p> <p>As we stated previously we are NOT in favour of the development of this site for the following reasons:</p> <ol style="list-style-type: none"> 1. An estate of 123 dwellings would overwhelm the village. 2. There are already 3 estates in Burghill--- Haymeadow Lane and Lower Orchard, Leasown, and Baker's Furlong. There are no estates in Tillington, on a main road. 	<p>Comments noted. Site 1C is not included as a preferential site in the Site Assessment Report</p>

	<p>3. The access from the proposed site is onto a narrow lane, without a pavement or street lighting. In parts it is not wide enough for 2 cars to pass.</p> <p>4. We walk, cycle or drive up and down this lane daily. When walking one needs to be alert to traffic speeding by and be able to stand aside on grass verges when cars come in both directions.</p> <p>5. There is no pavement at all to the Church and beyond. Walking to the Simpson Hall is equally dangerous as the pavement starts at the bus stop.</p> <p>4. We enjoy walking as a way of keeping fit and enjoying the countryside. More development would mean a lot more vehicles.</p> <p>5. There is no shop in the village, which again would mean more cars. We would respectfully request the Parish Council to consider these points.</p>	
<p>4. Martin Roberts.</p>	<p>It has belatedly come to my attention, I have been away and missed the last PC meeting, that I have until October 18th to respond to the ' Final Updated Site Assessment Report ' for the Burghill Parish Neighbourhood Development Plan. Apparently it is only over the past few days that parishioners have been advised that they can view the FUSAR at a couple of sessions at the Simpson Hall or online. Absolutely appalling! If this process were to be anywhere near being democratic the timescale for responses should be extended by several weeks. Regarding the FUSAR I repeat what I have said before. It is not fit for purpose. There are glaring errors. Assessment of all sites, as promised, has not happened. Major constraints and unsustainability issues have still not been addressed. I could go on but what is the point in commenting any further because, so many valid points raised by parishioners have been completely ignored, disregarded or redacted. Indeed 10 hand written letters to the previous USAR response were never read or acknowledged. I will save my comments till the Reg 16 stage (if it ever gets that far!) where I know my comments will be taken into account and considered by the Examiner for Herefordshire Council.</p> <p>However, there are a few things that must addressed by the PC. I would like to make a formal request for these to be on the agenda for next week's PC meeting. Firstly, the situation regarding the recent repeat application for site 2B. The Parish Council objected. The Chairman of the now disbanded NDP Steering Group wrote a very long letter of support. There is a clear conflict of interest by the former SG chairman that surely negates all previous NDP decisions which were led by the ex-Chairman.</p> <p>Also, the granting of Planning Permission for our Ward Councillors site in Tillington Common raises yet again the ongoing, unresolved settlement boundary issues regarding Tillington and Tillington Common which are still being ignored by the PC. This is despite the fact that HC have twice ruled, in 2015 and again this year, that it is up to the Parish, i.e. the parishioners (not the PC and not the SG!) to decide on</p>	<p>The report re-assesses the sites put forward throughout the process and gives some guidance for the Parish Council/ Steering group (as was) as to the suitability of proposed sites for future allocation in the Neighbourhood Plan.</p> <p>The USAR forms part of the process of site allocation. It gives a desktop evaluation of sites. It is for the Parish Council to use this information together with identified and justified local knowledge to select the sites for allocation in the Neighbourhood Plan.</p> <p>Comments noted. Not applicable to the Site Assessment Report</p> <p>The issue of Tillington Common and Tillington has been looked at many times throughout the process, and it has been agreed that the settlement is based around the Bell in and business park. The recent application promoted the proposed dwelling as a Paragraph 55 (National</p>

	<p>settlements and settlement boundaries. This problem leaves the PC open to huge potential problems if any interested parties should decide to take their issues to court.</p> <p>Finally, this latest granting of planning permission in Tillington Common now means we have 109 of our target of 124 new houses for the Parish. With the 19 allowable windfalls still on the list and another 14 years to go till the 2031 deadline what is the point of continuing with the ridiculous, unneeded, unwanted mini housing estate proposals for the latest FUSAR. I trust that my comments will be properly read by all PC members.</p>	<p>Planning Policy Framework) innovative and sustainable design proposal and was granted by the Committee against officer recommendation.</p> <p>The Parish Council wish to allocate some future housing in the Neighbourhood Plan.</p>
5. Veronica and Philip Towle	<p>Burghill Neighbourhood Development Plan (Site 1c)</p> <p>Wherever possible we believe that each development in the village should be small enough to fit in with the existing landscape and village scene. We also stress the importance of taking likely traffic into account. In this context we would like to add our voices to those opposed to the suggestion that the field near Haymeadow and Home Farmhouse should be built on (Site 1c) and particularly that 123 new houses might be fitted in there.</p> <p>The roads leading from the proposed site are already heavily used in rush hour and so many extra cars could only cause further congestion. The junction from the lane leading past Home Farmhouse onto the C1103 is hazardous for turning left with oncoming traffic from Tillington and the lane itself is one-way in places while scope for widening is limited because several houses are built on the side of the lane. Access for buses is consequently restricted. Finally, if so many houses were built it would alter the character and unbalance the whole village in terms of a huge increase in population numbers and extra stress on the surgery and other essential facilities.</p>	<p>Comments noted. Site 1C is not included as a preferential site in the Site Assessment Report</p>
6. Clare Fenton	<p>At the last Parish Council meeting it was agreed by the PC to receive further comments on the Final USAR. However, I did discuss an error in the stated windfall numbers and Mark Ellis the Chair requested I bring this to your attention. For completeness I have copied Mark Ellis in on this email and have also copied in the Parish Clerk. I will comment on the FUSAR document generally through Paulette the Clerk another time.</p> <p>I believe the numbers you have presented have been collated from the register of planning approvals and Samantha Banks emails that you requested from me (I attach this correspondence). If this is correct then your statement (following) in the FUSAR is incorrect:</p> <p><i>Without any further allocations, evidence that windfall sites are available within the parish to meet the minimum target will have to be provided. Whilst some proportion could be attributed to RA3/RA5 it is considered that relying on the residual amount</i></p>	<p>Comments noted</p> <p>The figures in the report are based on those received from Herefordshire Council.</p> <p>The statement in the FUSAR is the professional opinion of Kirkwells based on advice</p>

	<p><i>of 18 dwellings through Policies RA3 – RA5 may be difficult to evidence, as many of the original windfalls identified have now secured planning permission</i></p> <p>Only ONE of the previous windfalls was used in these figures. The fact that all windfalls had been used was quoted many times in the last meeting when we still have 19 left to include in the totals.</p> <p>The remaining windfalls that haven't been used in your totals (up to April 2017), haven't got planning as at April 2017 and were included in the previous draft NDP are:</p> <ul style="list-style-type: none"> Site 3 Buildings at Hospital Farm (6) Site 12 Land to the rear of No 12 Redstone (1) Site 33 Land and buildings west of Burghill Grange (1) Site 8A Court Farm Yard – Hop Kiln (1) Site 39 Land south east of Cherry Orchard Cottages (4) Site 40 Land to the west of Cherry Orchard Cottages (2) Site 4 "The Parks Farm Buildings (granted planning permission with possible 2 extra as windfall) (2) Site 5 "Lion Farm Buildings (granted planning permission with possible 1 extra as windfall) (1) Site 17 Green Lane (Rural business -Windfall). (1) <p>The Parish Council are basing their decisions on ONLY the facts you are presenting, therefore, your facts must be correct or the NDP will fail on these simple matters, not complicated ones.</p> <p>Please could you check your figures and advise/update the Parish Council before their next meeting.</p>	<p>received from Herefordshire Council at the time of writing.</p> <p>With regards to the windfalls, at no time have they been listed in the Neighbourhood Plan. Windfalls will come forward as planning applications to be determined by Herefordshire Council in accordance with RA3, RA4 and RA5</p>
<p>7. Clare Fenton</p>	<p>Following the Parish Council's publication of the Final USAR produced by Kirkwells, please find following my comments on same:</p> <p>I have attached the email sent to Claire Bradley of Kirkwells earlier this month which once again proves the numbers she is quoting are incorrect. We can achieve 18% using existing planning permissions and windfalls already allocated in the original draft NDP. Kirkwells quote that all these Windfalls were used when in fact only one was used. The Council are happy to accept windfalls as long as there is strong evidence to support. I understand that Policy RA1 already gives supporting evidence to windfalls – The Core Strategy 4.8.9</p> <p>Historically it is evident that much rural housing has come forward on small sites, often for individual dwellings, being allowed through the application of planning policy rather than the allocation of housing sites. Additionally, significant numbers of new housing continues to be delivered through the conversion of rural buildings, many being redundant agricultural buildings on farmsteads. Paragraph 48 of NPPF indicates that an allowance may be made for windfall if there is compelling</p>	<p>With regards to the windfalls, at no time have they been listed in the Neighbourhood Plan. Windfalls will come forward as planning applications to be determined by Herefordshire Council in accordance with RA3, RA4 and RA5.</p> <p>Whilst there is an element of windfall sites which will come through the planning applications process, the Parish Council wish to allocate some future housing in the Neighbourhood Plan.</p>

	<p>evidence that such sites have consistently become available in the local area and will continue to provide a reliable source. There is clear evidence over many years that such sites have delivered an important element of the county's housing supply and as such a modest windfall allowance for rural areas has been included of 1000 dwellings (50 per annum).</p> <p>Burghill Parish can easily support this with their own track record, in fact during the NDP process sites over and above those already identified as Windfalls in the previous draft NDP have come forward...we still have another 14 years to go!</p> <p>As such Kirkwell's 'No Change' response to numerous comments on the original USAR supporting the 18% growth using existing planning permissions and windfalls already allocated in the original draft NDP were based on inaccurate research and as such are unacceptable. These comments should be reconsidered again during this process. Parishioners will not have been Party to my email to Kirkwells and as such will not be aware the statement in the Final USAR is inaccurate and therefore misleading:</p> <p><i>4.5 Without any further allocations, evidence that windfall sites are available within the parish to meet the minimum target will have to be provided. Whilst some proportion could be attributed to RA3/RA5 it is considered that relying on the residual amount of 18 dwellings through Policies RA3 – RA5 may be difficult to evidence, as many of the original windfalls identified have now secured planning permission.</i></p> <p>As you are aware I regularly attend PC meetings and have witnessed members of the Parish Council and the BNDP Steering Group on the above 18% scenario say that they wished we could achieve the numbers because they would support it. At that time no one had produced evidence, I advised that I had evidence and subsequently forwarded it to Kirkwells.</p> <p>The other major floor in this Final USAR is the Settlement Boundary issues. We have always focused on Tillington vs Tillington Common but in fact Lower Burlton was never consulted on either and is an area that never existed until the BNDP. The Tillington vs Tillington Common could be the failing of the next draft BNDP especially with the support of residents in the 'notional Tillington Common' settlement to a recent windfall application in their area. We all know that the Council's use of Tillington and Tillington Common in their various reports has been interchanged and Samantha Banks has confirmed that Tillington and Tillington Common can be considered as being in conformity within the Core Strategy Policy RA2 fig 4.14. Therefore, the Parish Council need to provide robust evidence to support their choices.</p>	<p>Comments noted. The statement in the FUSAR is the professional opinion of Kirkwells based on advice received from Herefordshire Council at the time of writing.</p> <p>Whilst lists of possible windfalls have been sent to Kirkwells, these by their very nature are not suitable for allocation, and dependent on the planning application process. A significant proportion of the list may come forward across the plan period, however, the Parish Council wish to allocate sites in the Neighbourhood Plan.</p> <p>The issue of Tillington Common and Tillington has been looked at many times throughout the process, and it has been agreed by the original Steering Group and subsequently the Parish Council that the settlement is based around the Bell in and business park. The recent application promoted the proposed dwelling as a Paragraph 55 (National Planning Policy Framework) innovative and sustainable design</p>
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	<p>2.4 Tillington Common is not identified as a sustainable settlement by Herefordshire Council in the Core Strategy and therefore, there will be no allocations in Tillington Common, and as such the sites will not be re-assessed. This is no longer an acceptable statement.</p> <p>However, if this is the basis of the exclusion of the Tillington Common sites then we have to consider the notional area of Lower Burlton this was most definitely not identified as a sustainable settlement by Herefordshire Council in the Core Strategy and was in fact rejected in the Council's own call for sites exercise.</p> <p>It is not my intention to support any sites because I feel that an 18% growth for our community is sufficient. Tillington (incl the area around Tillington Common) has achieved it's 18% growth based on existing planning and windfalls and although Burghill has not achieved an 18% growth the notional Lower Burlton area has picked up the slack and I don't want to see the lovely areas around Burghill spoilt by developments the community may not want, I don't live there, I'm not directly affected so feel it's unfair to interfere. However, I must stress there is a bias shown towards developers in the FUSAR. Kirkwells have told me they will not listen to residents views, yet they are happy to listen to developers' (or their Agents) views and alter their assessments to suit. This is most disconcerting.</p> <p>Your responses to the Agent's comments relating to Site 2b Welsh Water – the Agent quoted the first response to his Client's previous planning application from Welsh Water, however, the Planning Officer made further enquiries following queries raised locally and responded as follows:</p> <p>Policy SD4 of the Herefordshire Local Plan – Core Strategy requires developments, in the first instance to connect to the mains infrastructure network. The application form suggests that a connection will be made to the foul drainage network. Welsh Water have been consulted and raised no objection to this, subject to the usual conditions. Further to queries raised locally, I requested some further information from Welsh Water about the location of the foul network. The response has been published to the website and as you will see that the does not seem to be a readily obvious way to connect within land in your clients control or ownership.</p> <p>would seek clarification on whether this approach is achievable. In the event that this cannot be achieved then we would, in line with policy SD4 consider alternative foul drainage options (see policy SD4 for order of options to be considered).</p> <p>Possible Contamination The Agent presents the Ground Investigation report presented in the same planning application</p>	<p>proposal and was granted by the Committee against officer recommendation.</p> <p>The Site Assessment report was amended in line with relevant responses and additional information/evidence available at the time of writing.</p> <p>Comments noted. Each of the following issues has been taken into account when undertaking the site assessment and a professional view taken.</p>
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The Planning Officer's response
Following consultation with the Environmental Health Officer (Contaminated Land) to consider contamination and risk to human health, I am advised that the EMS reports (EMS5671a and 5671b) are assessments of land which, while including the development site, is not specific to it. This is relevant as any risk assessment conclusions and recommendations will be based on the wider site. We would therefore seek, as both reports were scoped and prepared to consider a wider site the amendment of the reports so that they consider the subject site only to demonstrate the rationale of assessment, conclusions and recommendations are specific and appropriate.

A specific report as requested has never been presented and in fact if you read the original report excludes key areas of site 2B because the areas were inaccessible, or the pits collapsed.

Trees and Hedgerows
The Agent quotes a document that was superseded by the Council's own Consultee report

The Planning Officer's response
I would draw your attention to the comments from the Council's Landscape Officer on this matter that advises that the extensive vegetation along the perimeter of the site plays an important role in containing views in and out of the site as well contributing to its rural character. This level of containment helps to address the transition between urban and rural landscape.

Access
Again, the Agent quotes a report that in turn was commented on by the Transport officer
Visibility splays in both directions measured to nearside edge of road - 2.4m x 97m visibility splays required to north, 2.4m x 102m to the south are stated in the Transport Assessment and are shown on the drawings included in that document. However, the splays indicated on the drawing 1636.00B do conflict with this because the splay to the south is indicated to middle of the road (rather than the nearside edge). I would also advise that the scale bar on that drawing for the layout plan is incorrect.

I would also question whether physical features such as fences or trees, that are in the ownership of adjoining properties may also restrict the provision of visibility splays. A topographical survey may assist with clarifying this.

The site comprises a former quarry and lies some 2-3m below the A4110 road, as noted in the Ground Investigation Report (Para 3.2 South east section), and at the proposed point of access is estimated to be around 2.5m-3.0m below the A4110 and is noted in the Ground Investigation Report to have "very steep exposed soil

	<p>and rock faces" which was observed during the site visit. There is vegetation/hedge and some large trees on this slope and a limited existing verge of around 1.0-1.2m adjacent to A4110. The vegetation/trees currently forms a visual and physical boundary to the highway, and possibly support to the highway edge. Much of the vegetation is likely to require removing to achieve the required visibility splays and for provision of a footway from the proposed access to the A4110/A4103 junction on the development side of A4103. The small scale of the layout drawing and lack of design information/existing topographical information does not allow assessment of the achievability of an access and footway at that location and any consequent detriment to the existing road stability and highway safety.</p> <p>The adoptable road and footways required to serve the development will need to be constructed on embankment 2.5m-3m high. The Ground Investigation Report (Para 5.1.2) indicates the ground in this section to be loose made ground (quarry spoil) for a depth of up to 3.8m which is likely to require further excavation prior to road construction and suitable construction to adjoin to the steep rock face adjacent A4110 and to avoid differential settlement. Pedestrian barrier and possible vehicle barrier may also be required, depending on actual level difference.</p> <p>It should also be noted that site 2B has made a possessory claim on the strip of land that allows access of the A4110, therefore, until 12 years have passed this site has to be deemed undeliverable. It cannot be assumed that the true owner will not come forward and stake their claim.</p> <p>Suitability</p> <p>Technical reports presented to support the previous application have all been questioned and deemed insufficient or inaccurate during the previous planning application for site 2B, therefore the information is out of date and suitability should be deemed on fact. This is not backland development the site is surrounded on two sides by open countryside.</p> <p>The disappointing aspect of this is that when I was a member of the Steering Group I raised concerns and was advised to write directly to Kirkwells, which I did. All of the above documents that I refer to were presented to Kirkwells at that time, therefore, the information was readily available. However, it would seem that this evidence backed correspondence was deemed a 'resident's view' rather than evidence backed information from a Steering Group member.</p> <p>I would request that Kirkwell's consider the above when reviewing Site 2C also.</p> <p>Site 10 is predominantly a BAP site and has continually been misrepresented to the Parish by suggesting the whole site can be developed. I cycle through this area and cannot understand how a string of a few houses near a car place, paper shop</p>	<p>The Final Updated Site Assessment Report was issued to the Parish Council and took account of all comments received throughout the consultation</p> <p>Comments noted.</p>
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	<p>and a pub can be determined as a potential settlement for growth. The infrastructure isn't there. Building around this area would create a significant hazard to me as a cyclist and I am continually reminded of the dangerous nature of the cross roads near the pub every time a planning application is presented before the Parish Council. The addition of 14 dwellings to this area (as per your table 3 most favourable scores) is very worrying and I hope the Parish Council will consider the area unviable due to road safety.</p>	
8. Joanna Helme	<p>I am writing in response to your consultation on the Updated Site Assessment Report (USAR) that forms part of Burghill's Neighbourhood Development Plan (BNDP).</p> <p>I feel that the USAR is a very sensible re-assessment of the sites first identified in the BNDP. It allows for realistic margin in terms of numbers, to allow for any shortfall due to sites being withdrawn, while maintaining a density rate of housing in line with local preferences. If housing numbers only just meet the number required by the Core Strategy, there is a danger that it will be returned to the Parish Council for further consideration of deliverability by either the County Council or the Independent Examiner.</p> <p>I feel very strongly that some of the responses received by the Parish Council during the consultation period of the USAR should not be considered as true responses to the USAR but to an anonymous letter that was circulated at the same time, which misrepresented the USAR and BNDP, causing considerable anxiety among local residents. I think it highly reprehensible that people who no longer reside in our parish should be trying to influence the outcome of a democratic process. Nor is it democratic that a small minority of people who seem to be against any development in the parish, should be attempting to undermine all the work that has gone into it, and ignore the outcomes of the public consultations that have taken place. The best way to find out if the BNDP is acceptable to local people is for it to go forward to Referendum.</p> <p>I very much hope that Burghill Parish Council will approve the USAR and its inclusion in the BNDP and that having done so, they will re-submit the BNDP at Regulation 16. We cannot afford to wait any longer, while planning applications are being submitted for sites that are not identified in the Plan.</p> <p>It is important to remember that the BNDP is not just about sites for development. There are many other important policies included in it which we could lose if the BNDP is not finally adopted.</p>	Comments noted
9. A H Vaughan	<p>The procedure followed by the Burghill Parish Council (BPC) for its Neighbourhood Development Plan, in reaching Regulation 14 of the Statutory Instrument, has been satisfied. This was confirmed by Herefordshire Council. In moving to the next stages, the updated site assessment report takes on board the comments</p>	Comments noted

received from those currently living within the parish together with those who have now left to live elsewhere. Within its time frame and budget limitations, the updated site assessment report deals appropriately with those land use matters which are relevant to the selection of preferred sites for inclusion in a development plan.

The updated consultants' (Kirkwells) report is a competent assessment of land use for the submitted sites. It has been independently prepared. It identifies current housing commitments within the parish since 2011 which would contribute to the 18% Core Strategy growth target for housing. It then goes on to identify a small number of preferred sites, within sustainable zones, which would add to existing dwelling commitments to meet growth targets, with a slight margin of over-provision. Having such a margin is a sensible approach as it caters for sites being withdrawn or obstacles in the delivery of preferred sites, such as unforeseen infrastructure problems.

The selection of some of the preferred sites has not been a popular choice for those who live close to these sites. However, to reject these sites would only lead to less favourable and unsustainable choices elsewhere in the parish. Furthermore, it is only possible to assess those sites that have been offered and come forward in the process.

It is impossible to please everyone, and the objective methods of site selection set down by the Local Planning Authority have to be followed, otherwise the NDP would fail later down the line at other check points.

In terms of community engagement, with the current site assessment, the PC has placed the document on display and held open sessions at The Simpson Hall. The document has also been published on the parish council's website. This process has been criticised by just a minority. There has been a flow of negative comments throughout, but almost always from the same minority group representing less than 5% of residents and a consistent thread of objection from a few who have now moved away. Some of these comments have appeared to be unrelated to land use planning and also seem to rely on inaccurate information. Nevertheless, the PC has been stalwart throughout the process in properly concentrating on the land use issues and seeing the matter through to this stage. It is now hoped that the consultants can produce the next draft of the NDP for its Regulation 16 submission to the Herefordshire Council. This will lead into later independent examination and the referendum in the months that follow when those residing within the parish, who are eligible to vote, will have a chance to support the document. This process is about local choice for local people. It is in the interests of the parish to have in place this Neighbourhood Development Plan to

	guide the development structure of the locality in a sustainable fashion in future years.	
10. Neil Christie	<p>Why does the Parish Council persist in proposing further development over and above that requested by Herefordshire Council?</p> <p>Current planning approvals to date have brought the number of identified sites to 108 leaving a mere 16 to be found, a figure with will surely be met by “ Windfalls” well before the target date of 2031. The previous NDP even identified 19 such windfalls as a suitable and acceptable inclusion in The Plan. By virtue of the very concept of Windfalls these developments are likely to happen anyway. Yet the latest version of the NDP has now rejected the idea of Windfalls but seeks to impose a small number of “selected” development sites, so the eventual number of sites developed will once more be well in excess of Herefordshire’s target. The inclusion of Windfalls in the NDP is an approved and legitimate concept according to Herefordshire policy.</p> <p>Why does the Parish Council persist in proposing further development when parishioner consultation and previous responses to the Parish Council make it abundantly clear that they do not want more development?</p> <p>Why does the Parish Council persist in promoting the development at Whitmore Cross (Site 10)?</p> <p>Given that the PC wishes to persist with excess development, there are many more suitable infill sites within the existing settlements in the Parish, yet the PC persists in creating a new settlement at Whitmore Cross, notwithstanding the adverse impact on the rural area, not to mention lack of utilities. The objections that the PC has levelled only this week (and somewhat spuriously) at a perfectly acceptable site at Live & Let Live could equally be applied to Site 10 a few hundred yards away!!</p> <p>The NDP is a sham and should be redrafted as a simple Plan incorporating the 108 developments to date plus a very reasonable provision for 16 Windfalls (such as the site at Live & Let Live, so arbitrarily rejected this week). This will meet the expressed wishes of Herefordshire Council and the Residents of the Parish.</p>	Comments noted
11. Robert and Sally Field.	<p>My husband and myself both agree, that growth in excess of 18% (124 houses) is totally unacceptable in such a rural area, putting unnecessary strain on services. Traffic etc. (the only possible exception being windfall housing) .</p> <p>Any large development in Burghill would not only spoil the area, but be a cash cow for developer's, as highlighted by the new build at pye finch. A Blot on the landscape, not at all in keeping with the village. How were these plans agreed???</p> <p>One wonders.</p> <p>Site 2A. The land between the Roman road and st Mary's, lower burlton. Potential capacity 717, has now conveniently become a possible urban development,</p>	Comments noted.

	although in Burghill parish. Surely this has to be taken into consideration, should there be a shortfall in the future housing requirements, or are Herefordshire council making the rules up as they go along?	
12. Geraldine Roberts	<p>I am writing in relation to the final updated site assessment report for the Burghill Parish Neighbourhood Development Plan.</p> <p>I note that the required number of dwellings that is needed to meet the target of 124 has now fallen to 15 after granted planning permissions have been taken into account.</p> <p>Surely, within the time frame given i.e. until 2031, this number will be met by the windfalls that are recognised in the NDP. I believe that any development for Tillington should be organic and in keeping with the housing that is already there - as it generally has been over the previous hundreds of years.</p> <p>Not only should Tillington be allowed to grow more slowly - and as tastefully as possible, there are safety issues to consider. As I have suggested before, in a previous letter, the two sites proposed for Tillington (Nos. 25 and 10) have no safe access. All villagers, particularly those who walk along the road, know the dangers of the nearby bend.</p> <p>Please consider these points of view. As I have said before, there are other ways to supply adequate housing in the county and the country. We must do what we can to protect our villages and countryside for future generations.</p>	Comments noted
13. OKX Architecture	<p>As requested please find my comments relating to site 22.</p> <p>We write to inform the Parish Council and Kirkwells of concerns relating to the site assessment in Kirkwells last updated report released in September 2017 in relation to site 22.</p> <p>1. Under the heading Views/Landscape/Character site 22 has attracted a score of 0.5 this means there is minor impact on views/landscape. Under site analysis and section headed suitability it states site would not impact on views from outside the village. Under the suitability chapter, page 7 of Kirkwells report it states no impact on views/landscape - score 0. The score should therefore read 0 for site 22.</p> <p>2. Under the heading Contamination site 22 attracted a score of 0.5 and is described as greenfield. This means there is minor known contamination issues. Under the suitability chapter page 7 of Kirkwells report it states no known contamination issues - score 0. The question is, what are the minor known contamination issues? The adjacent site 10 is described as part brownfield/part greenfield and has attracted the same score 0.5. The known contamination issues for this site quite reasonably can be identified visually because it has been used for commercial purposes, is potential land fill/scrapped vehicles leaking petrochemicals and potential hydrocarbons as well as tyres and we would describe</p>	<p>Comments noted</p> <p>The previous contamination issues are related to agricultural operations and responses from Herefordshire Council Environmental Health Section to such issues.</p>

	<p>these contaminants as significant There is no comparison between these two parcels of land. We contend that site 22 should score 0 and site 10 should score 1.</p> <p>3. The most favourable scores on page 13 of Kirkwells report lists site 21 second with 41.7% but this percentage is derived from 15 scoring sections whilst site 22 is derived from 13 scoring section and yet both sites have exactly the same total of 6.25 and remember this does not allow for the mistakes made under 1 and 2 above. The two additional sections are a/ conservation area and b/ heritage asset. We see no reason why these two sections should not apply to all sites within the parish and there is no good reason for the omission for the Tillington sites. This would mean that site 22 would move above site 21 under the most favourable scores.</p> <p>4. Kirkwells must provide a reason why for this assessment only the frontage was assessed. The site was considered as a whole in all other reports and although the steering group thought only the frontage should be used, the original request was for the whole to be assessed.</p> <p>5. Site analysis for site 22 under the heading suitability states a significant section of hedgerow would need to be removed in order to facilitate vision splays for access and this therefore attracts a score of 0.5 and this is where the scoring system fails to recognise a significant improvement in highway safety. The loss of some rural character is insignificant in this case, because the section of road is hazardous and with or without any development this section of road badly needs improvement and the site therefore in this case should not be marked down.</p> <p>6. Guidance notes from Herefordshire Council on suggested approach to choosing sites: There are no hard and fast ways of choosing specific site allocations once you have determined that they are necessary, but the site selection process should be carried out in an open and transparent way, including consultation with the community and the production of a full evidence base to support and justify conclusions reached. We trust the guidance will be followed when considering comments 1 to 5 above.</p>	<p>The scoring in each section is converted to percentages, based on the total.</p> <p>The frontage was assessed as it had been included as an allocation in the previous version of the plan.</p>
<p>14. Helen and Alan Sheriff</p>	<p>Having read and considered the updated Site Assessment Report, we as relatively new residents of Burghill, are shocked at the amount and scale of possible development sites identified within the report. Burghill currently retains a peaceful charm and a character, part of the reason we chose to live here, which we would think any resident of the area would wish to hold on to and protect. Whilst we appreciate “appropriate” development has to be acceptable in all communities, we do not see that large housing estates are at all appropriate for this area. If such development is allowed to take place, in years to come Burghill</p>	<p>Comments noted. The constraints and impacts relating to sites 1a, b and c have been taken into account in the Final Updated Site Assessment Report</p>

	<p>will cease to exist as a village, it will be absorbed and exist as a suburb of Hereford.</p> <p>Open, arable countryside is extremely vital in many respects - for the livelihood of farmers and provision of food, for the well-being of the local population and for wildlife conservation.</p> <p>We would like to comment specifically with regard to Site 1a, 1b and 1c:-</p> <p>These sites have been detailed as having potential for large scale estate-like development which is in our view totally inappropriate for the following reasons :-</p> <ul style="list-style-type: none"> - Firstly, referring to Point 4.11 of the Report, we cannot see that such large scale density development would have any less an impact on the character of the Burghill settlement than in Tillington. We therefore see that the SAME reduction should be applied to the dph calculation for Burghill which has immense character as a village that MUST not be lost. - The land is currently valuable arable producing land, providing farmers with a livelihood; - Site 1c in particular, would vastly extend the village southwards, completely destroying the view of the village on approach. When Haymeadow was built, trees were planted and TPOs put in place to screen the development, in order to preserve the view of the village from the approach - obviously a strong consideration at that time and equally should be now. An Estate of 123 modern houses could not possibly be screened sufficiently to preserve the village view and would completely change the aspect. In our view, this also applies to Sites 1a and 1b; - The access lane is far too narrow to accommodate such an increase in resulting volume of traffic and offers no facility for pavements; - Large estates are already planned for Hereford, why does Burghill need to be overdeveloped? - If such development occurs, modern homes will far outweigh older homes and in our view, the balance of old and modern needs to be conserved; - Burghill does not have facilities needed for such an increase in population, eg. no shop, school, doctor's surgery within walking distance; - Finally, we respect that appropriate development is required, however feel it is imperative that we ensure the conservation of such a beautiful, historic village for future generations. 	
<p>15. Russell Hoddell</p>	<p>Please forward this letter to all Burghill Parish Councillors.</p> <p>Burghill Parish Council still refuses to listen to any genuine, factual, pertinent comments and concerns from anyone outside their unelected clique in regard to "their" NDP - there has NEVER been one single material change you have taken on board or even been willing to discuss. Therefore, it is pointless making any</p>	<p>Comments noted</p>

	<p>further comments to this extended consultation period which is fake with yet again a warped sense of what true consultation is - merely uploading a document to a website does not count as consultation.</p> <p>The unelected Burghill Parish Council only serves it's own interests which has been self-evident throughout this process where the majority of you simply haven't engaged in the process. As the qualifying body that is your job. Instead as individuals and members of this community, we have been met with indifference abuse, intimidation, misrepresentation and lies - it is appalling and shocking how some of you have behaved.</p> <p>There has been much talk of "elites" throughout the country who have failed to listen which has caused terrible strife and damage to it. You can consider yourselves no different. So, when you think of the machinations at Westminster and other organisations then think of yourselves too - you are a part of everything so wrong because here in this Parish we have our very own "elites" - which I use in the pejorative - YOU!</p> <p>You should all be ashamed of your actions and how you have behaved. If you had even a modicum of integrity you would all resign.</p>	
16. Cyrus Amini	<p>I understand that, for some unknown reason, my 3 buildings are not included in the latest NDP. Can you explain how this happened?</p> <p>I require that these three are INCLUDED in the NDP as submitted/known windfalls which conform with Core Strategy Policy RA3 countryside and Policy RA5 Rural conversions.</p> <p>Please confirm that we are in agreement on this and that they will be included. Or if not, then can you please explain your reasoning?</p>	<p>With regards to the windfalls, at no time have they been listed in the Neighbourhood Plan. Windfalls will come forward as planning applications to be determined by Herefordshire Council in accordance with RA3, RA4 and RA5.</p>
17. Carolyn Lawrence	<p>Site 1c - I cannot believe the arbitrary "care" that the existing parish council is wielding in this village and how suggesting ye more housing which chooses to literally totally disregard the infrastructure surrounding the site.</p> <p>I visited my doctor yesterday an opportunity which already takes 6 weeks to book a particular named doctor. The surgery was booked solid and they are not able to sign on any new patients already let alone a further 123 households.</p> <p>The Parish Council, I have always assumed, exists to take account of parishioners, not to exclude them. It seems the same attitude exists to waid the eventual inhabitants of these 123 dwellings which will be built on land at risk of flooding – medium to high risk.</p> <p>The SAS use the site for training purposes, the site is meticulously farmed, and all of the local people frequent it for walks and dog walking. But probably the most dramatic part of the plans concern traffic. Already the once daily bus service cannot be passed by cars travelling in the opposite direction as with tractors.</p>	<p>The report re-assesses the sites put forward throughout the process and gives some guidance for the Parish Council/ Steering group (as was) as to the suitability of proposed sites for future allocation in the Neighbourhood Plan.</p> <p>The USAR forms part of the process of site allocation. It gives a desktop evaluation of sites. It is for the Parish Council to use this information together with identified</p>

	<p>Utilities would be required to service the site – What does that include? The plan is inappropriate in every detail, let alone representing inappropriate extension of the village southwards</p> <p>The Times Oct 9th, 2017 – Green Belt development threat grows.</p> <p>The only amenity to these 123 families will be the church of St Mary or a 7-minute drive away the only village shop which is in Tillington.</p> <p>So, I too wish to add my voice to those opposed to this plan of 123 dwellings on Development Plan site 1C.</p>	<p>and justified local knowledge to select the sites for allocation in the Neighbourhood Plan.</p> <p>Comments noted. Site 1C is not included as a preferential site in the Site Assessment Report</p>
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