



## Progression to Examination Decision Document

### Neighbourhood Planning (General) (Amendment) Regulations 2012

Name of neighbourhood area	Bridstow Neighbourhood Area
Parish Council	Bridstow Parish Council
Draft Consultation period (Reg14)	31 October to 16 December 2019
Submission consultation period (Reg16)	3 February 2021 to 17 March 2021

#### Determination

Is the organisation making the area application the relevant body under section 61G (2) of the 1990 Act		Yes
Are all the relevant documentation included within the submission <ul style="list-style-type: none"> <li>• Map showing the area</li> <li>• The Neighbourhood Plan</li> <li>• Consultation Statement</li> <li>• SEA/HRA</li> <li>• Basic Condition statement</li> </ul>	Reg15	Yes
Does the plan meet the definition of a NDP - 'a plan which sets out policies in relation to the development use of land in the whole or any part of a particular neighbourhood area specified in the plan'	Localism Act 38A (2)	Yes
Does the plan specify the period for which it is to have effect?	2004 Act 38B (1 and 2)	Yes
Are any 'excluded development' included? <ul style="list-style-type: none"> <li>• County matter</li> </ul>	1990 61K / Schedule 1	No

<ul style="list-style-type: none"> <li>Any operation relating to waste development</li> <li>National infrastructure project</li> </ul>		
Does it relation to only one neighbourhood area?	2004 Act 38B (1 and 2)	Yes
Have the parish council undertaken the correct procedures in relation to consultation under Reg14?		Yes
Is this a repeat proposal? <ul style="list-style-type: none"> <li>Has an proposal been refused in the last 2 years or</li> <li>Has a referendum relating to a similar proposal had been held and</li> <li>No significant change in national or local strategic policies since the refusal or referendum.</li> </ul>	Schedule 4B para 5	No

## Summary of comments received during submission consultation

Please note the below are summaries of the responses received during the submission consultation. Full copies of the representations will be sent to the examiner in due course.

### Herefordshire Council representations

#### ***Department: Environmental Health (Air, Land & water protection)***

i) Land amounting to around 0.45 hectares at Bridruthin, Bannuttree.

A review of Ordnance survey historical plans indicate the proposed site appears to have had no previous historic potentially contaminative uses.

ii) Land amounting to around 0.4 hectares at the Old Vicarage, Bannuttree.

A review of Ordnance survey historical plans indicate the site has historically been used as an orchard. 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

iii) Land amounting to around 0.8 hectares at Oaklands, Buckcastle Hill.

A review of Ordnance survey historical plans indicate the proposed site appears to have had no previous historic potentially contaminative uses.

iv) Land amounting to around 0.4 hectares at Foxdale, Buckcastle Hill.

A review of Ordnance survey historical plans indicate the proposed site appears to have had no previous historic potentially contaminative uses.

v) Land amounting to around 1 hectare at Cotterell's Farm, Buckcastle Hill.

A review of Ordnance survey historical plans indicate a Builder's Yard site for was situated

immediately adjacent to the south of the allocated site.

It is possible that unforeseen contamination may be present at the above mentioned site. Consideration should be given to the possibility of encountering contamination as a result of its former use and specialist advice be sought should any be encountered during the development.

**Department: Environmental Health (Noise/Pollution)**

Key concern with regard to this Neighbourhood Plan are the road traffic noise impacts from the A40 and A49 which the plan does not address for future occupants.

This is contrary to the Planning Practice Guidance for Noise which specifies that the acoustic environment must be taken into account in the design and layout of the site.

Commenting on the overall policies of the plan we made the following recommendations for amendment. These have not been incorporated in the Reg 16 consultation document and are therefore repeated again.

Para 4: Vision and objectives

To accommodate new housing sensitively within and adjacent to the Parish's settlements, ensuring the types and sizes of dwellings meet local needs in particular. This would be by:  
Additional paragraph

*e) Ensuring that the acoustic environment is taken into account in the design and layout of the houses and site BR13 Wilton settlement boundary*

Our department objects to the settlement boundary for Wilton which identifies the potential for residential land use abutting the A40 adjacent to the Castle Lodge Hotel. Noise is a significant constraint at this site and it is highly likely that potential residents would have to keep most of their windows closed all of the time to block out road traffic noise. The site would not provide for a good level of amenity for proposed occupants.

Should it be determined that this is the settlement boundary for Wilton we would recommend the following additional criteria: *g) New residential development should not be adversely impacted by road traffic noise.*

Map 3: Bridstow Policies Map (Bannuttree)

As stated also in the Regulation 14 response our department also as objections regarding the proposed settlement site at far western end of the Bannutree Map 3 which is right up against the A49. There is a high risk of adverse impacts from road traffic noise at this location with no scope for sufficient noise mitigation.

Should it be determined that this is the settlement boundary for Bridstow Bannuttree we would recommend the following additional criteria: *f) New residential development should not be adversely impacted by road traffic noise.*

**Department: Strategic Planning**

No conformity issues raised. Full comments are within appendix 1

Policy BR12-The resistance to the provision of street lighting presents a slight conflict with SD1, which states that new development should create safe and accessible environments,

minimising opportunities for crime through the. There is a possibility that developments that come forward may create the need for this where necessary for safety and security reasons.

***Department: Development Management***

A quick reference guide to the policies and the page number at the front of the document would greatly assist officers in using the policy efficiently.

Need to capacity of the junction next to the school and which would serve the allocation north of the A49 at Bridstow has been checked with Highways England

In relation to specific policies:

BR1 (c) - need to clarify what is meant by housing that meets "local community need" it doesn't appear to be well defined and in this context would be a very subjective consideration

BR3 –includes a different definition of what constitutes major development given the NPPF

BR7 – is this adding anything in the context of established policy?

BR8 – again this policy is not really adding anything as WW will object/condition development where capacity is an issue

BR9 (a) – no reference to electric charging points?

BR18 – concerned about a dichotomy in wording of this policy – major development resisted, will only be accepted where it has public benefits AND do not adversely impact upon the AONB.

Would it not be better to say that its impact will be mitigated?

BR19 –large scale polytunnel development will amount to major development so this policy is effectively objecting to the principle of polytunnel development

***Department: Transportation***

The Highways Development Management Team have reviewed the draft NDP and would make the following comments on its content. These relate to the operation of the local highway network. It is recognised that the A49 and A40 in the vicinity of the parish are under the control of Highways England and they are best placed to comment on aspects that impact upon the national strategic road network.

The previous comments have been reviewed and the content of the updated regulation 16 plan updated to reflect the comments made, these are primarily focused on the need to deliver sites following robust assessment of the transport implications of the site (along with mitigation to reduce impacts and encourage modal shift to active modes wherever possible). This approach is supported and accords with wider HC policies.

In addition, the plan consistently applies a requirement to deliver compliance with Herefordshire Council's Highways Design Guide for New Developments.

It is noted that the specific sections of the network that were highlighted by the team previously have been included appropriately for developers to consider prior to developing schemes on the sites identified. An example of this is the likely need for traffic management provisions near Rock Cottage.

The proposed regulation 16 draft is considered appropriate for delivering the transport requirements for the developments put forward by the NDP and the Highways Development Management Team have no further comment to make at this time.

## **External consultee representations**

### ***Welsh Water***

Provided comments at Regulation 14 stage - nothing further to add at the current time, other than the reinforcement scheme at Lower Cleeve WwTW has now taken place.

### ***Historic England***

Previous comments remain relevant.

### ***National Grid***

No comments to make

### ***Natural England***

Natural England's advice is that this proposed development may contain (or require) measures intended to avoid or reduce the likely harmful effects on a European site, which cannot be taken into account when determining whether or not a plan or project is likely to have a significant effect on a site and requires an appropriate assessment (following the *People Over Wind* ruling by the Court of Justice of the European Union).

Advise that on the basis of the information supplied that the application may have a likely significant effect on the site. These measures therefore need to be formally checked and confirmed by your Authority, as the competent authority, via an appropriate assessment.

The sewage treatment works and waste water will eventually discharge to the River Wye SAC. Therefore, there is an environmental pathway here to be considered between the proposed development and the watercourse, which would result in a likely significant effect on the River Wye SAC. The Plan also has a reliance on Policy SD4 of the adopted Core Strategy, to make development acceptable, which is also considered a form of mitigation.

It is recommended that this be assessed at Appropriate Assessment stage.

### ***Herefordshire and Worcestershire Clinical Commissioning Group***

No direct comment on the plan, but welcome the policy promoting improved broadband and telecommunications infrastructure which is of benefit to the provision of healthcare into rural communities.

### ***The Coal Authority***

No specific comments to make on the plan.

## **NFU**

Food production is a key priority for economic growth both nationally and is vitally important in a rural area such as Bridstow. Therefore for the farming community the vision above can be achieved by a number of themes. These should be taken into account.

## **Members of the public representations**

### **Alison and Ivor Stamp – Resident (Objection)**

Objection to Housing site around Buckcastle Hill.

Objection to policy BR1 and BR12.

Concerns regarding highway safety, lack of sight lines and impact of additional traffic from new housing development will exacerbate this.

Concerns of disproportionate housing development, increase of 65% of housing in the area. The proposed housing exceeds housing targets for parish.

Proposed development at Cotterell's farm is out of keeping with the character and AONB.

### **Alex Atock – Resident (objection)**

Inappropriate housing development, wrong to build behind houses will turn Bridstow into a suburb to Ross on Wye.

Inappropriate to build so many houses so far from the village core. The Cotterell's Farm land, which we had been told by the owners would not be built upon and which is very good farmland as well as being outside the present settlement boundary of the village

Building a group of 8 houses on that field together with 8 opposite on the Littlefields site is totally out of keeping with the village nature. In addition, it is against the expressed wishes of the community in the initial consultation when people said a very clear 'No' to larger groupings of houses.

### **Alexandra Bubb - Resident (objection)**

Large number of properties in a small radius, development proposed will double the amount of housing already here.

Objection impact of additional vehicles on road infrastructure. Feels there are more suitable sites that could be used.

### **Anthony Priddos, Resident (objection)**

The proposal to build a 'major development' on the Cotterell's Farm is not sound and does not comply with National Policy and should never have been included in the Bridstow NDP.

The Cotterell's Farm site proposals also fail on Highway Safety grounds because of the lack of the necessary sight lines.

The Cotterell's Farm site proposals do not meet Policy BR4. It is neither right nor necessary to remove the Grade 2 Very Good Farmland at Cotterell's farm out of farming use for houses.

To propose building at the furthest distance from the core of Bridstow village does not meet the NDP stated intention of "strengthening community identity and cohesion". No visual impact analysis has been undertaken to justify the proposed extension of the existing settlement boundary, and so the proposal does not comply for this reason either with national policy. The character of the proposed development at the Cotterell's Farm site does not comply with the National Policy Planning Framework.

The Bridstow NDP has included a disproportionately and unacceptably large number of new houses in the Buckcastle Hill settlement area. The Bridstow NDP makes provision for 17 more houses than are required. The proposals for houses to be built at the following should all be removed from the NDP.

- the Cotterell's Farm site ('some 8 dwellings')
- land adjacent to Foxdale ('a minimum contribution of 3 dwellings')
- land adjacent to Oaklands ('a contribution of 5 dwellings')

The Bridstow Housing Target of 57 houses can be met without any of these 16. The Bridstow Housing Target without them would still be 58 (and also still leave 10 new houses in the Buckcastle Hill area which constitutes a 25% increase on what is currently there).

Therefore, do not include these three sites. They are not needed and the Cotterell's Farm one especially does not comply with national policy.

***Dave Colman – Resident (general comments)***

The Plan does not reflect the original requirement for a 64/36 split between Bridstow and Wilton. The plan restricts development by development boundaries. Who decided where these would be placed?

There should be a statement of interest by the authors. This statement would not have to list the names, maybe just the area in which they live, and their particular interest.

Commented on para 2.21, 3.11, 3.12, 3.13, 3.15, 3.32, 3.36, 3.42, 3.43, 3.44, 4.2c, Policy BR4 D, Para 8.3, para 8.11 and para 8.20.

***Dave Payne – Resident (objection)***

Plan would be disproportionate development within Buckcastle Hill area.

Large numbers of new houses to be built away from village centre which is close to amenities. Concerned that development in Buckcastle Hill would result in additional traffic and has raised concerns about highway safety and speeds.

Need sustainable development that reduces need on cars and encourages walking and cycling. The proposed development is away from the amenities.

Development should be in keeping with natural aesthetic, concerns that the housing site would not be in keeping with that.

***Edward Price – Resident (objection)***

Comments regarding the Wilton Settlement Boundary. Does not provide appropriate level of housing in the village of Wilton, exclusion of the land south west of Wilton Lane.

The shape of the site subdivision at W1 Wilton lane was considered to be incongruous, it does not follow that an alternative simple linear subdivision parallel to the lane and constrained to be in line with Bannutree Lane is incapable of providing nine 2 and 3 bedroom houses (where there is currently a Local area imbalance) at the higher density suggested in the plan process and which it has now been demonstrated is the limit the highway is easily capable of accommodating.

Such a design additionally utilising a carefully designed row of garage/home offices in part of the available space adjacent to the A40 to create an acoustic shadow, is capable of meeting all the legal amenity requirements.

The appeal relating to the previous planning application did not in fact confirm any material objections relating to drainage/flooding, noise/air quality or highways safety, an outcome that is at odds with the provably inaccurate SHLAA which should thus carry no weight in this assessment.

However it did signal the need for a detailed design to appropriately respect the historic visual aspect as seen from the river in conjunction with the bridge and adjacent buildings. Following such process there is no reason this modified site could not improve upon the existing C20th century frontage and thus combined with simpler, but more effective landscaping improve the setting of the heritage assets.

Missed opportunity for a zero carbon build, this could achieve several of the requirements identified in the AONB management plan for the provision of a type of housing that is greatly needed.

***Ian Jenkins – Resident (comment)***

Commend Parish Council for hard work on the NDP.

Residents/ general public are apprehensive of plan that involve the building of additional housing and response with buildings behind other residents buildings is extremely emotive, and reasons people move to a rural area is not to be surrounded by other property. The proposed areas for development are all behind existing property and the landowners appear not effected at all. My view there should be no development behind existing property but alongside where it is possible. If not then no development should be allowed. Does not agree with the parish council approach.

***Irene Meridith – Resident (objective)***

Development in Buckcastle Hill would adversely impact the rural nature of the location and quality of life of residents.

The land identified for potential development at The Cotterells Farm is rolling pastureland in an AONB. Recommendations in the NDP that requirements would be necessary to 'mitigate the effects' the development would have on the landscape clearly recognise that it would be detrimental to the rural landscape .This is not just viewed from the roadside but in all directions.

The identified development of 8 houses on the field, together with other developments proposed opposite at Little Fields and further down the hill, increase the number of dwellings



in this rural area disproportionately and exceed the requirements required by the Bridstow Housing Target.

There are no amenities in this area to support the increase in population. Minimal public transport, concerned about highway safety, developments would increase number of private cars. Years ago planning for a one small bungalow for ageing family members was refused on this land. Extending the hamlet and increasing access onto the Hoarwithy Road were deemed inappropriate and cited by the Planning Authority in the reasons for refusal. These conditions have not changed, except the volume of traffic has increased, prompting the provision of 30mph signs further along the road but this limitation is largely ignored by through traffic.

In summary, I concur with objections already covered in detail in the submission by Anthony Priddis and believe the proposed developments do not comply with national policy

***John Champman, Mike Tunnycliff and Fred Cook – Residents (objection)***

Objection to proposed development at Bidruthen.

Impact on highway safety-Emphasise existing difficulties for pedestrians walking to Ross, Wilton and village amenities.

Development of footpath and access to the proposed site

Poor access to the site in Bidruthen, is not adequately reflected in the NDP  
Impact on the amenity of residents. In the proposed plan put forward by the developers the access road to a turning area ran immediately behind these properties with the bungalows facing our properties. This is understandable because of the large oak trees at the western boundary of the paddock which must be kept in any development plan. However this arrangement affects our security creating an easy rear access plus the maximum adverse effect on our privacy. Should any development be granted in this area, to mitigate the impact on privacy, there should be a height restriction limiting the properties to single story dwellings. Due to the proximity of any building, ideally they should be backing onto our properties

***Julia Wilde – Resident (objection)***

Concerned about several proposal in the NDP.

Concerned that none of the PC/NDP open days and meeting minutes are on the website.

***Kathy Priddis- Resident (objection)***

Objection to the parish settlement boundary has been redrawn to develop land at Cotterels farm, object to this proposal.

Object to new housing in the AONB and the size of the proposal within the AONB.

Objects to the inflated number of houses proposed in the Buckcastle Hill area.

Highway safety objections, land at Cotterels farm sits outside the 30mph speed limit and within a 60mph zone, sight lines of 215m would be necessary.

Landscape objections, impact on landscape mitigation measures required.

Objections to the inflated number of new houses proposed in the Buckcastle Hill area.  
Environmental objections to the Cotterells farm site.

Overall object to housing development on farmland in the Cotterells Farm site and believes the NDP is badly thought through and against national policy.

***Michelle McDonald – Resident (objection)***

Object to the intention to build 26 new houses within a mile radius of each other in this small area of the hoarwithy road outnumbering the existing properties in this rural area is indefensible and disproportionate.

Object to a rural village in an AONB and this plan is turning a small area into a housing estate. There are no amenities in this immediate vicinity, no pavements and a dangerous pinch point to get to the A49. The Oaklands plot in particular, to build behind existing road frontage properties is completely irresponsible and lacks imagination and planning. Asks why more plots weren't identified.

***Mrs Alalami – resident (objection)***

Objection to proposed developments in Buckcastle Hill area.

There is not a need for huge number of proposed dwellings at the Cotterells, Oaklands and Foxtale. The 74 dwellings is disproportionately excessive and unnecessary when an extra 4 dwellings is needed.

The original proposed quota by Herefordshire Council was 35 dwellings in Bridstow and 20 in Wilton. If there are clear reasons why you cannot develop further in Wilton, by grouping the quota for the whole parish it leaves a disproportionate quota to be found in Bridstow.

Housing proposals will be detrimental to the AONB and have a detrimental impact on the Wye Valley AONB. Objects due to the road safety, areas of concern are:

The road is a narrow, rural road which are *already* subject to high volumes of traffic it was not intended for.

There are no pavements and few places in which to create pavements.

There are areas of road which are not wide enough for two large cars to pass each other, never mind the regular large farm vehicles that move up and down this road.

The road has a speed limit of 30 mph but vehicles often drive above that limit and on many occasions excessively so.

The risk of injury to pedestrians and cyclists using this road is already high, and it would increase substantially with the proposed developments

***Nicola La Grue – Resident (objection)***

Objection to proposed developments in Buckcastle Hill, especially at Cotterell's Farm. Size and placement of development sites, does not reflect the feedback in the residents questionnaire of developments more than 5 houses.

Size and development of Buckcastle Hill is a major development but is not acknowledged in the plan, major development should not be endorsed in an AONB.

Road safety- In general and an issue of Buckcastle Hill and speed limit of 60mph.

Objection to area of special character (Buckcastle Hill). No explanation of why this has been designated as an area of special character.

Wilton- Imbalanced in the proposals for development in Wilton. There is potential to include 5 starter homes on a brownfield site.

Response to youth forum views-PC took no action in response to their comments.

Response to Bridstow to CE primary school views- PC took no action in response to their comments.

***Powells chartered surveyors/ land agents on behalf of Mr Webb, landowner (objection)***

Land West of Land Acre, Bridstow. Client's land has been excluded from the proposed settlement boundary revision, when its inclusion is clearly logical.

The proposed allocation of land to the north of our clients land is actually on a higher elevation and is clearly considered acceptable for residential development.

Request a variation to the draft NDP to include our clients land within the settlement boundary and policy wording change to require the proposed allocation off Banutree Lane to include vehicle and pedestrian access from the proposed allocation south of Banutree Lane.

Bridstow Parish Council draft NDP proposed settlement boundary and related policies to be unsound because of being inconsistent with the Core Strategy and the NPPF. Land has been excluded to the south of the settlement, north of the A40 at Land Acre, which must be included within the revised settlement boundary.

Herefordshire Council is failing to deliver the required number of dwellings in the Authority Area and the south of the county needs to take up the lack of delivery in the north of the county. The LPA need to maximise opportunities within the existing settlement.

Herefordshire Council 5yhrs issue is exacerbated by NDP's which are too restrictive and conflicting with policy RA2 and the Core Strategy generally and as such are damaging the Councils ability to deliver the required numbers of housing to meet its HMA targets.

7.1.5.The UK Government White Paper is material to the development of the NDP, and with a likely increase in Objectively Assessed Need (OAN) through a Core Strategy review the NDP needs to create flexibility in the plan to accommodate an increased housing need and minimum target.

***Victoria Piechowiak – Resident (objection)***

That the NDP has included too many proposed new houses in the Buckcastle Hill area, disproportionate to the rest of the village, and the increased amount would be out of keeping with a village settlement and an ANOB.

The proposals for 'gated entrance' to the Cottrells farm site, and the height and size of proposals for houses at Foxdale, are both totally out of keeping with the existing low rise village houses, and would give a 'suburban' look in a rural village.

The proposed sites, and the one adjacent to Oaklands cottages are all far from the hub of the village, which is nearer to Wilton where the school, village hall, church, and garage shop are located.

Additionally, if these plans were implemented, the amount of extra traffic generated on this already busy narrow road, would be substantially increased.

Cotteralls Farm And the other sites along the Hoarwithy road, at Oaklands Cottages and Foxdale, should be withdrawn from the Bridstow NDP on the grounds that a total of 26 new houses in the Buckcastle Hill area is disproportionate to the rest of the village, out of keeping in an area of ANOB and damaging to existing residents local amenity.

***William Wilde – Resident (objection)***

The area is designated nationally as an Area of Outstanding Beauty, and therefore any developments can only be proposed under 'exceptional circumstances'. What are these circumstances?

The field in question is classified as Grade 2 Agricultural Land and is currently farmed as pasture for livestock. Such land is outlawed for development under the national planning policy guidelines for the ANOB.

Planning permission already exists for 8 new large executive houses in the parkland immediately adjacent to this proposed site, literally across the road. 16 houses in one vicinity meets the criteria for description, as a 'housing estate'. The development of housing estates is contrary to National Planning Policy within the ANOB.

C1261 road has a highly dangerous width restriction at Rock Cottage, just below its junction with the main A49 trunk road. 16 new houses means an average of a further 25 vehicles using this already busy and dangerous road every day, extra traffic will render this road extremely unsafe.

The NDP for Bridstow has had to redraw and extend the village settlement boundary in order to accommodate for this proposal. Adjacent properties and landowners have not as yet been informed or contacted by Bridstow NDP for consultation on what will be a very contentious issue.

There are no pavements in this part of Bridstow, not even to the junction with the A49 Trunk Road. All journeys from the proposed site would have to be made by vehicle. It is a very long and dangerous way on foot to reach either school or church. Should the provision of pavements be required to meet Planning Regulations for such developments along this road,

the area character will change from rural to suburban which is contrary to the wishes of the majority of villagers at a previous public meeting in 2014.

This draft proposal greatly increases the housing density in this part of Bridstow (along the C1261 road, Buckcastle area) to significantly change the whole character of the area to suburban from rural. Yet again contrary to national planning policy within the ANOB.

### **Officer appraisal**

All the consultation requirements of Regulation 14 were undertaken by the parish council and all the required documentation was submitted under Regulation 15.

This plan has met the requirements of the regulations as set out in the table above. No concern has been raised from internal consultees with regards to the ability of the plan to meet the required minimum proportional growth contributing towards the deliverability of the Core Strategy. The parish minimum proportional growth requirement of 57, as of April 2020 4 have been completed and 24 have been committed. Site allocations in the Bridstow plan allocated for up to 29 dwellings, windfall is expected to achieve 10 dwellings. This adds up to 67, exceeding the housing target by 10. There is also a memorandum of understanding with Ross-on-Wye Town Council, they can accept up to 15 dwellings of Bridstow's housing growth.

The plan includes settlement boundary for the identified settlement of Bridstow, Wilton, Claytons, Buckcastle Hill and Bannuttree. This takes into account existing commitments and proportional growth requirements of dwellings. The plan also allows for windfalls and some capacity within the settlement boundary and rural windfall. Therefore it is likely that Bridstow will continue to provide opportunities for growth in the plan period.

30 representations were received during the submission (Reg16) consultation period. 5 from internal service providers at Herefordshire Council. 6 responses were received from external statutory consultees and 1 from an external body.

### **Internal Comments**

The majority of internal consultees from Herefordshire Council, have had no significant objections to the plan, and mostly provided general and supportive comments to the plan.

Strategic Planning have confirmed that the policies within the plan are in general conformity with the Core Strategy. There is a recommendation to provide street lighting in accordance with SD1. To ensure safe and assessable environments.

Development Management and Environmental Health (Air, land and waste division) have raised no major objections to the plan, but have highlighted areas for clarification and improvement. Environmental Health (Noise and Pollution division) have raised an issue with the settlement boundary in Wilton and noise mitigation. Environmental Health have advised on additional criteria to be provided for Bridstow, Bannuttree Lane.

Transportation have raised no major objections, support the approach the NDP has taken since regulation 14. They have advised a traffic management plans are likely to be required prior to development on the sites identified in the NDP i.e around Rock Cottage.

### ***External Comments***

There have been 18 representations from residents and land owners of the Bridstow NDP. The main issues of concern for residents were:

- The site allocation at and at Cotterals farm.
- The site allocation in Buckcastle Hill
- The site allocation in Bidruthen
- Impact on highway safety
- Impact on landscape character and AONB
- Disproportionate development in the identified settlements
- Extra traffic generated from additional development and its impact on limited infrastructure
- Impact on the rural village character for the settlement in Bridstow
- Exclusion of the land at Bannuttree lane

NFU have raised no concerns to the NDP and have provided constructive comments.

Statutory Consultees have raised no concerns regarding the site allocations or objectives and policies contained in the neighbourhood plan. Historic England, Coal Authority, Welsh Water and have raised no concerns during the Reg14 consultation and Regulation 16.

Natural England have noted that the Bridstow HRA assessment has screened out likely significant effects, with the conclusion the site allocations are not near a watercourse and the scale of growth not having an appreciable effect. However, Natural England have not agreed with this conclusion. The Neighbourhood Plan allocates for a certain number of houses within the Bridstow area and appears to be connecting to mains drainage, in the form of Lower Cleeve Waste Water Treatment Works. The sewage treatment works and waste water will eventually discharge to the River Wye SAC. Therefore, there is an environmental pathway here to be considered between the proposed development and the watercourse, which would result in a likely significant effect on the River Wye SAC. The Plan also has a reliance on Policy SD4 of the adopted Core Strategy, to make development acceptable, which is also considered a form of mitigation. Natural England have recommended for this be assessed at Appropriate Assessment stage, to show how the above mentioned works can adequately mitigate the proposed development.

Herefordshire Council have noted Natural England's response, a position statement has indicated that within the River Wye catchment SD4 is seen as a policy plan policy which is not considered as mitigation. However an Appropriate Assessment can be undertaken at examination, if deemed necessary.

Overall it is considered that there are no fundamental issues relating to this plan which would prevent its progress to examination. Outstanding objections can be addressed during the independent examination process.


### **Assistant Director's comments**

Although I note the comments from Natural England regarding the need for an HRA Appropriate Assessment, I am happy that our legal advice has indicated that Appropriate Assessments are currently only required within the Lugg catchment, rather than the whole of the Wye SAC length. However, should we can undertake an Appropriate Assessment as part of the examination process if so required at a later date.

There are no other significant outstanding objections that in my opinion would result in any valid reason as to why the progression to examination should be halted. I therefore agree that this Neighbourhood Plan progresses to examination.

### **Decision under Regulation 17 of the Neighbourhood Planning (General) Regulations 2012.**

It is recommended that the Bridstow Neighbourhood Plan **does** progress to examination at this stage.

A handwritten signature in black ink, appearing to read 'M.A. Willimont', is written over a light-colored rectangular stamp or background.

Marc Willimont

Assistant Director for Regulatory, Environment and Waste Services

Date: 23<sup>rd</sup> April 2021

From Herefordshire Council Strategic Planning Team

Name of NDP: Bridstow- Regulation 16 submission version

Date: 17/03/21

<b>Draft Neighbourhood plan policy</b>	<b>Equivalent CS policy(ies) (if appropriate)</b>	<b>In general conformity (Y/N)</b>	<b>Comments</b>
BR1- Sustainable Development	SS1	Y	
BR2- Development Strategy	SS2; RA2	Y	
BR3- Major Development within the Wye Valley AONB	SS6; LD1	Y	This aspect of protection may already be covered by the Wye Valley AONB Management Plan?
BR4- Conserving the Landscape and Scenic Beauty within the Wye Valley AONB	SS6; LD1	Y	
BR5- Protecting Heritage Assets	SS6; LD4	Y	Protection and enhancement of heritage assets and their settings should be applied in a manner that is appropriate to their significance.
BR6- Enhancement of the Natural Environment	SS6; LD2	Y	
BR7- Protection from Flood Risk	SD3	Y	
BR8- Sewerage and Sewage Infrastructure	SD4	Y	
BR9- Sustainable Design	SS7; SD1	Y	
BR10- Housing Design and Appearance	SS6; LD1	Y	
BR11- Traffic Measures within the Parish	SS4; MT1	Y	
BR12- Highway Design Requirements	SS4; MT1	Y/N	The resistance to the provision of street lighting presents a slight conflict with SD1, which states that new development should create safe and accessible environments,



Draft Neighbourhood plan policy	Equivalent CS policy(ies) (if appropriate)	In general conformity (Y/N)	Comments
			minimising opportunities for crime through the. There is a possibility that developments that come forward may create the need for this where necessary for safety and security reasons.
BR13- Housing Development in Wilton	RA2	Y	
BR14- Housing Development in Bridstow	RA2	Y	
BR15- Housing Sites in Bridstow Village	RA2	Y	*Site i) has been submitted in recent call for sites, confirming continued availability/development intention.*
BR16- Housing Development within Buckcastle Hill Area of Special Character	RA2; LD1	Y	
BR17- Agricultural Diversification, Tourism and other Employment Opportunities	RA6; E4	Y	
BR18- Renewable and Low Carbon Energy	SD2	Y	
BR19- Polytunnel Proposals	N/A	Y	
BR20- Protection and Enhancement of Community Facilities	SC1	Y	
BR21- Protection of Local Green Space and Areas of Open Space	OS1; OS2; OS3	Y	
BR22- Contributions to Community Services, Youth Provision and Recreational Facilities	N/A	Y	
BR23- High Speed Broadband and Telecommunications	N/A	Y	