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Llangarron Neighbourhood Plan

Parish Council Response to Comments submitted during Regulation 16 Public Consultation

July 2021

Kirkwells

The Planning People

1.0 Introduction and Background

- 1.1. Llangarron Parish Council submitted their Neighbourhood Development Plan (NDP) to Herefordshire Council on 22nd March 2021. The Submission version of the Llangarron NDP was published for consultation by Herefordshire Council from 29th March 2021 until 10th May 2021 in accordance with Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended).
- 1.2. The public consultation generated a significant number of responses. This document sets out the Parish Council's responses to the key issues raised during the consultation process. It has been prepared by Kirkwells Planning Consultants on behalf of the Parish Council.

2.0 Summary of Positive Responses and General Comments

- 2.1. It is calculated that there were about 65 responses supporting the NDP from a cross section of residents and statutory bodies, about 10 general comments (largely setting out concerns about the impacts of additional housing development) and about 23 objections, from local landowners, residents, some respondents who live elsewhere, and also one parish councillor. It should be noted that a number of responses included a mix of general, positive and negative comments and as a result there may be some slight variation in these figures.
- 2.2. There were standard, non-specific / no comments responses from several consultation bodies including the Coal Authority, Welsh Water, NHS Herefordshire and Worcestershire CCG and Natural England.
- 2.3. Herefordshire Council considered that all NDP Policies were in general conformity with the Core Strategy. The Council suggested that Policy SUS1 included some quite detailed criteria which may be covered sufficiently by other policies and Policy HOU2 may not be necessary as the issue is covered in similar detail by the Core Strategy. There was a suggestion for a minor wording change to Policy HOU4 which it is recommended would be supported by the Parish Council.
- 2.4. Historic England advised that it *'is supportive of both the content of the document and the vision and objectives set out in it. The emphasis on the conservation of local distinctiveness and the protection of rural character is highly commendable. Overall the plan reads as a well-considered, very concise and fit for purpose document which we consider takes a suitably proportionate approach to the historic environment of the Parish'*.
- 2.5. In addition a selection of the positive comments from parishioners are set out below:
 - Our village boundaries as shown in the NDP are popular and suitable for such small villages with very few facilities and terrible road/traffic problems. We have increasing problems with flooding and river pollution. More housing causes more flood run off and pollution threat through sewage.
 - The process has been thoroughly democratic.
 - Our village boundaries as shown in the NDP are popular and suitable for such small villages with very few facilities and terrible road/traffic problems.

- As best I can judge, the Llangarron neighbourhood plan is a good reflection of the majority of residents' views and presents a balanced, thoughtful way to develop the community, taking into account local constraints and wishes (such as flood risks and the strong local desire to protect the rural nature and character of the parish). The Parish Council have done an excellent job bringing the plan to this stage and reflecting the views of the community.
- It was with some surprise that I read the figures released by Herefordshire Council in September 2020 which clearly confirmed that Llangarron is one of the very few parishes to be dramatically over target for housing growth, surely this would confirm that we have done our bit and it's time to have the Neighbourhood development Plan in place to try and help control future building in this area and that future development should be concentrated within the parishes which are well under target.
- I am very grateful to the members of the parish council for their considerable commitment, hard work and resilience in producing the Llangarron Parish Neighbourhood Plan
- I support the draft NDP for Llangarron Parish in its entirety. I would like to thank the Parish Council for their hard work and dedication to carrying out an open and diligently fair process of consultation and development.
- It is a good plan that reflects the broad view of the inhabitants of Llangarron and surrounding areas.
- I wholeheartedly support this plan which will protect the integrity of the area.
- I fully support the Llangarron NDP, in particular reference to the villages boundaries. It is an exceptionally professional and well thought out, thorough plan.
- We are content with the existing plan. There has been ample consultation, over the past years, and we believe that the plan reflects the view of the majority.
- As a new member of the community and having reviewed several local plans in previous residences areas. I believe this to be the most comprehensive and inclusive Local plan I have reviewed.
- After exhaustive work and input I am pleased to see a well crafted and comprehensive plan.
- I wish to give my full support to the current NDP. I feel that this has been updated and now represents the views of the majority of the residents of the parish.
- I fully support the Parish Development Plan which has been produced following extensive considerations and careful planning.
- We would like to support fully the Llangarron Parish NDP and thank all those involved for their hard work. This is a comprehensive study and report which has taken in so many aspects of our parish and which makes pertinent points and sensible suggestions.

2.6 Contained within the 65 comments supporting the Plan there were a number of recurring issues raised. These were:

- Increasing and speeding traffic
- Supporting the proposed settlement boundaries
- Poorly maintained and narrow roads
- Poor infrastructure and therefore sustainability
- Flooding to properties and roads affecting emergency vehicle access
- Pollution, particularly phosphates

- Drainage and Sewage
- Over development
- Garron water quality
- Loss of hedges and trees
- Damage to wildlife and general ecology
- Housing size and design
- Lack of pavements
- Herefordshire 4.2 year housing supply
- 100 planning permissions against a 2031 target of 67
- Loss of dark skies
- Creeping suburbanisation
- Affect on Wye SAC & SSSI

2.7 Many of these are already addressed in the Llangarron NDP policies - please refer to Table 1 in Section 4 for more detail.

3.0 Comments about the NDP Process and Parish Council

3.1 In relation to comments which were not supportive of the Plan process, the sections below set out the Parish Council's responses under the main themes. Many of these are similar to points made by respondents and addressed by the Parish Council, in response to the Regulation 14 public consultation, and are covered in the Consultation Statement.

1. There was 'no' or 'insufficient' public consultation.

The consultation process covering all stages of the NDP's preparation up to submission, is set out in full in the submitted Consultation Statement. Many parishioners have commented positively on the consultation processes (see 2.5 above and the Consultation Statement).

The current Parish Council was elected in May 2019 and has followed the advice of professional planning consultants Kirkwells in relation to the Neighbourhood Planning Regulations (as amended) and Planning Practice Guidance. The very large number of consultation responses, 92 residents at Regulation 14 and a similar number at Regulation 16, indicates a high level of local awareness of, and engagement with, the NDP process.

The Parish Council NDP meetings held in the Autumn of 2019 and Spring 2020 were open public meetings and well attended, particularly when village boundaries and housing policies were being discussed. These meetings provided opportunities for residents and stakeholders to ask questions, to comment, and to find out more about the emerging Draft NDP process and content of the Plan.

Additional 'Drop in' events were not held as a) the demography and socio-economic profile of the parish had hardly changed since the initial 'planning for all' data had been gathered, and b) the overwhelming feedback from the public was frustration at the delays in the process, with the vast majority wanting the NDP to progress rapidly in the face of multiple planning applications being put forward by developers.

All documents relating to the emerging Draft NDP were published and in the public domain throughout the process. All elements of the plan were discussed publicly and

all votes by the Parish Council were in public. The public were given ample opportunity to speak. There was a protocol for the conduct of meetings adopted in September 2019 under the guidance of HALC. This was to manage the meetings appropriately and to give as many people as possible the opportunity of contributing. Those with local development interests were invited to speak alongside other stakeholders but were not permitted to dominate discussions, or to prevent other members of the public from speaking, or to interrupt proceedings.

At NDP meetings there was no 10 or 15 minute time limit or 'cut off' for members of the public, and certainly no 'stopwatch'. Items were discussed and there was public input in relation to each NDP issue / planning theme.

It is believed that some individuals commenting on the time limit at meetings have not attended any meetings, whilst others may have confused their recollections with regular (non NDP) Parish Council meetings or zoom meetings when there is a time limit for public speaking (although this is only a guideline to allow time for all to contribute). Examination of time allocated to discussions will show that all contributions were heard, and the guideline time limit was often exceeded to allow for this. The Director of HALC was temporary Clerk for some of these meetings so the Parish Council could be absolutely confident that all due processes were followed.

Zoom meetings held during the Covid lock downs were fully open to the public and were well attended by stakeholders. Face to face public meetings would have been both unlawful and irresponsible and the Parish Council had to follow the additional advice provided in Planning Practice Guidance in relation to consultation processes.

Given the strength of feeling of members of the public wishing the NDP process to progress, delaying the process for an indefinite period was not an option for a Parish Council wishing to serve its Parishioners. No concerns were raised with the Parish Council concerning inability of individuals to join meetings.

2. 'Lack of Parish Council Publicity for Regulation 16 consultation'.

The Regulation 16 public consultation was the responsibility of Herefordshire Council. It was publicised on the neighbourhood planning pages of Herefordshire Council's website - see <https://www.herefordshire.gov.uk/directory-record/3079/llangarron-neighbourhood-development-plan> .

The Parish Council also provided information about the submission of the NDP and the Regulation 16 consultation on the NDP pages of its website.

It would not be appropriate for the Parish Council to invite comments to be sent to the Parish Council at this stage as it would be confusing for stakeholders and to Herefordshire Council. It was made clear that all responses should be referred to Herefordshire Council.

It is worth noting that the relatively high number of responses demonstrates a high level of local awareness of the consultation.

3. 'The final, submission version of the NDP was not approved prior to submission to Herefordshire Council for Regulation 16 consultation.'

The Submission version of the NDP was formally approved by the Parish Council on 21st January 2021, subject to any editorial changes (as recommended by Kirkwells our planning consultants and following normal practice). All Parish Councillors apart from one voted to approve the plan.

At the Parish Council meeting the following week (26th January 2021) the Consultation Statement and Appendices and Basic Conditions Statement were approved for submission by the Parish Council, with one councillor objecting.

Minutes of these meetings are provided on the Parish Council website.

4. 'Landowners were not spoken to / approached'.

The Parish Council undertook a Call for Sites in late 2018 / early 2019 and all landowners and agents were invited to submit proposals for possible sites for housing allocations in the NDP.

Landowners, along with all stakeholders were invited to comment on the Draft Plan during the Reg 14 consultation. Landowner and developer responses and the Parish Council's consideration of these are set out in Table 4 of the Consultation Statement. All were considered carefully. Landowners were also given opportunities to speak at Parish Council meetings. They were not given more time to speak than other members of the public but were given ample time to put forward their views. At all consultation stages comments from all stakeholders were invited in writing.

5. Complaints about 'the historic NDP process prior to 2018'.

Information about the first version of the Draft Plan is provided in the Consultation Statement in Section 2 First Regulation 14 Public Consultation, from 6th February 2017 to 20th March 2017 and Subsequent Review of NDP:

'2.8 Following consideration of the submitted responses, including those from Herefordshire Council which set out a number of concerns relating to the general conformity of the Draft Plan Policies with the adopted Local Plan Core Strategy 2011 - 2031, the Parish Council made the decision to undertake a comprehensive review of the NDP and to prepare a revised Draft Plan for formal consultation.'

'2.9 It was decided that the review would be led by the Parish Council and the former Steering Group / subcommittee was disbanded. The review comprised a fresh look at the entire Draft Plan, covering its supporting text, Draft Policies, identified settlement boundaries and proposed site allocations.'

A revised NDP was prepared from 2018 to 2020 with informal and formal consultation processes informing the content of the new Plan. The work on the revised NDP used the original plan as a starting point, but the document underwent significant

revision and further public consultation. Most of this process was completed before COVID guidelines took effect, so it included a number of public face to face meetings.

Therefore, the former Plan process was superseded by public consultations leading up to the second Regulation 14 consultation and Submission of the NDP. Complaints about the former, historic processes linked to the previous version of the Draft Plan are considered largely inconsequential.

There were no concerns raised by Herefordshire Council about the process for the emerging revised Draft Plan and second Regulation 14 consultation.

6. July 2019 NDP training for the new Parish Council.

This meeting appears to be a recurrent area of concern for some landowners and a small number of residents as it was not open to the wider public. There were two complaints made to Herefordshire Council's Monitoring Officer in 2019 relating to these matters. The Monitoring Officer determined that there had not been a breach of the Code of Conduct and that the issues relating to the NDP process were matters for the Parish Council to determine.

The status of this training is covered in the Consultation Statement:

'2.11 In May 2019 Parish Council elections were held and an entirely elected Parish Council was returned with a majority of new members. The first meeting of the new Parish Council was held on 21st May 2019. On the 15th July 2019 the new Parish Council received an NDP briefing from Kirkwells on the draft NDP in progress.'

There was nothing sinister or 'cloak and dagger' about this meeting. It merely updated the newly elected Parish Councillors with a summary of the NDP process to date and included a discussion of key planning themes and elements that might be addressed in the updated Draft Plan. No decisions were made at the meeting. It is entirely appropriate for new Parish Councillors to be updated with regard to progress on the NDP and to be given information about the main planning issues that were being considered at that time.

There were subsequently many opportunities for informal engagement in the preparation of the Draft Plan. This is set out in paragraph 2.12 of the Consultation Statement:

'2.12 The new Parish Council held a number of dedicated NDP meetings in addition to normal Parish Council meetings. These were all open to the public. Items discussed were published and open votes were held. All councillors and members of the public were given opportunities to speak. Normal Parish Council limits on public speaking time were suspended at NDP meetings allowing the public more time to comment and respond.'

Dates of NDP meetings:

- 9th September 2019
- 16th October 2019
- 4th November 2019
- 21st November 2019

- 4th February 2020
- 25th August 2020 (Zoom).'

7. The AECOM Technical Site Assessment report was 'suppressed' or 'changed'.

The Consultation Statement summarises the process in Section 3 Call for Sites and Technical Site Assessment.

'3.4 In late June 2019 the draft report was received. The draft report was placed on the Parish Council website in September 2019, while the assessments of the final two sites and answers to some queries by the Clerk were awaited. On 9th September 2019, the AECOM report was discussed at the Parish Council meeting and 53 members of the public attended. The relevance of the report was questioned in the light of planning approvals given over the previous 2 years including some sites assessed in the report. The final, complete version of the AECOM report was received by the Parish Council in November 2019.

3.5 The public were invited to comment on the AECOM report and the report was discussed in Parish Council meetings. The Parish Council acknowledged that the AECOM Report was a tool which they can use to help to determine sites suitable for inclusion in the NDP, however it was resolved not to include the AECOM Report in any formal role in the NDP process as the housing target had been met and exceeded by 50% through completions of developments and commitments and site allocations for housing were no longer required in the NDP. At the Parish Council meeting on 21st November 2019, a decision was made not to allocate sites or to use the AECOM report. This decision reflected the views of the great majority of residents. NDP Housing policies were also discussed and voted on.'

The Technical Assessment was undertaken by independent consultants AECOM under the Locality technical support programme and the final version was signed off by Locality.

8. 'There are no site allocations in the NDP so further new housing development is not possible'.

The NDP has been positively prepared with a suite of locally detailed planning policies to help inform future decisions on planning applications. The Plan will not 'stop' all new development. Planning applications will continue to be submitted and will be determined in accordance with the development plan (currently the Core Strategy and hopefully the NDP, once made) unless material considerations indicate otherwise, as set out in planning law.

Policies in the NDP support new development within the settlement boundaries of the settlements identified as suitable for development in the Core Strategy, subject to addressing the policy criteria.

An objector states that a small development would not be permitted in an outlying cluster of buildings. This is not necessarily the case providing the policy criteria of the

Core Strategy (particularly as set out in the rural area policies such as RA3, RA4 and RA5) and any relevant NDP policies are addressed.

9. Objections to the identified settlement boundaries.

The overwhelming majority of the public at meetings, and responses to Regulation 14 and Regulation 16 consultations, have been in favour of the proposed settlement boundaries.

There are a number of comments made by potential developers and others about Llangarron boundaries.

In response to these specific points:

1. The council houses in Llangarron were built well outside the village as was often the case in the 1940s. Open fields still separate these areas from the village.
2. The council houses at Park Mill have been considered to be located outside the main village in a number of recent planning decisions as have several fields and the Garron Brook, which are also separate this area from the village. See National Planning Inspectorate Judgement APP/W1850/W/20/3250543 and Herefordshire Council determination on application 202998/O. Both proposals are located near the Council houses at Park Mill and were refused in part 'by virtue of its location being divorced from the main built up area of the settlement'.
3. The Garron Centre is attached to the Grade I Listed Church which is within the settlement boundary in the centre of the village. The village hall is on the edge of the village and outside the settlement boundary. Neither area is suitable for development.
4. The boundaries do not exclude the possibility of modest development, in line with many residents' preferences.

10. 'The 64 house target for 2031 is a minimum and should therefore be ignored.'

The NDP notes the most up to date information about housing delivery in the Parish as part of the background / supporting text.

At the time the NDP was submitted, information from Herefordshire Council showed that there were 31 completions since 2011 and 65 commitments giving a net residual total of -32 houses for the NDP area. That means that housing developments in the Parish have delivered 32 houses over and above the minimum housing target set out in the Core Strategy for the Plan period up to 2031 ie over 50% above the target. The most up to date figures (as at July 2021) show that new housing and commitments now number 105, so the Parish is now nearly 65% over the minimum target.

These are significant growth figures, noted in the NDP paragraph 9.26. It is appropriate for the NDP to note the minimum growth target set out in the Core Strategy and to provide information about the Plan's future growth strategy, taking the minimum housing requirement into account.

Also, figures from September 2020 indicate a 4.2 year housing supply in Herefordshire, higher than objectors are stating. See information from James Latham, Herefordshire Technical Support Officer presented in September 2020 ('**2020 5 Year Housing Land Supply (2020- 2025) January 2021 ADDENDUM**').

Finally, many parishes are well under target and should take their 'share' as Llangarron should not be responsible for meeting the majority of the county wide shortfall.

11. There are no allocations of small houses in the NDP.

There are no site allocations in the NDP but Policies support the provision of smaller 2/3 bedroomed homes within the settlement boundaries. Unfortunately, of the 105 houses now granted permission in the parish only 4 are officially 'affordable' and only a very small minority are 3 bedroomed. Schemes have been approved for 4/5 bedroomed homes and developers have been asking for variations to planning consents for 2/3 bedroomed homes to make them 4 bedroomed.

The NDP cannot influence developments that already have planning consent. Enlarging settlement boundaries would not necessarily lead to more smaller homes. It is believed that local housing associations and Herefordshire Council are seeking to build or acquire houses for rent in more sustainable locations with services, jobs etc in local towns.

12. The NDP 'favours' one settlement over another.

There is an unfortunate recurrent theme in some responses that the Parish Council is somehow biased. It is believed that these responses may be motivated by landowners wishing to develop land in Llangarron. The concern seems to be that Parish Councillors are from Llangarron and are wanting to direct development away from that settlement and towards Llangrove.

The Parish Council is an elected body, democratically elected in 2019 and Councillors work hard to represent the interests of the Parish as a whole.

The Parish Councillors' homes are in the following locations:

- 4 in Llangrove
- 3 in Llangarron
- 1 in Llancloudy
- 3 in none of the settlements. Of these 1 has a farm between Llangarron and Llangrove and 2 live in isolated properties closest to Three Ashes.

All the settlements have seen new housing developments proportionate to their size. So, although Llangrove has had permissions for over 40 houses and Llangarron 16 since the NDP process restarted in 2018, Llangarron is a much smaller village with only approximately 35 houses in the main built part of the village (prior to the recent developments and planning consents). (These figures are to the best of local knowledge at the current time but subject to change.)

The NDP seeks to support suitable and sustainable development in all the settlements. Llangrove is identified in Table 4.14 in the Core Strategy as a 'settlement which will be the main focus of proportionate housing development' and all the other settlements are in Table 4.15 which identifies 'other settlements where proportionate housing is appropriate'. Llangrove has mains drainage, a much larger population, and services such as a school farm shop and pub and has grown considerably in recent years for these reasons.

All settlements have identified settlement boundaries to guide development in the NDP. The settlement boundary for Llangrove should help protect the settlement from further major or unsuitable development.

13. Llangarron has 'dwindled in size'.

In Llangarron, the shops, school and garage have all been turned into houses, therefore the population has not dwindled but there are fewer services and facilities.

The school, shops etc. all started to disappear in the 1960s, as is the case in villages across the country. The opening of the A40 allowed access to local towns and the growth of the private car resulted in a once-a-week bus service. Self-sufficient rural communities with tiny shops serving a population with no access to transport or on-line shopping is a thing of the past.

The developers' argument that building more houses in Llangarron, or any of the settlements, would lead to the re-opening of shops and services etc. is not realistic.

14. There are no allocations for business / commercial development.

This is a very rural community and the public consultation responses did not suggest that employment / business site allocations should be included in the NDP. The plan does however encourage home / work units and appropriate farm diversification.

15. The Policies Maps do not show all the commitments.

The larger commitments were shown at the time of submission and Herefordshire Council updated the Policies Maps using their own mapping systems. Herefordshire Council may update the Policies maps further if required, and the maps will be available as interactive maps on the HC planning web pages.

16. There are 'no plans to encourage sustainable transport'.

It is not the role of the NDP to set out community transport plans. Sustainability and environmental issues are addressed and the Plan promotes alternatives to the private car for travel where possible. The Plan supports EV charging points and cycle storage and encourages more walking and cycling.

17. Flooding 'is not dealt with'.

The NDP includes policies to address flooding and drainage. Some comments that Llangarron is only flooded / partially cut off for short periods of time actually support

the view that building in vulnerable areas must be resisted. Flood mitigation schemes, as suggested, would not be an NDP matter.

18. 'Broadband is not mentioned'.

Broadband rollout is referred to in the NDP. NDP Policies support such infrastructure in new developments.

19. The policies relating to ecology are 'poor'.

There are a wide range of such policies which are seen to be of high quality and relevant by statutory consultees. One comment, asking that 106 monies be earmarked for ecology projects must be seen in the light of only one project being eligible for this money, and none have been available to date. Funding for traffic management measures was also mentioned.

The NDP does not have the power to change to modern farming practices. The polytunnels policy does not encourage polytunnels, chicken units etc. but instead seeks to set out strict criteria that would need to be addressed in planning proposals. As such the Parish Council was encouraged to have such a policy. Dark skies are included, for example, no street lighting, and no all-night lighting. Zero carbon future is addressed with small scale domestic renewable power being encouraged. Local people were expressly against any larger scale projects.

20. The pub should be a community asset.

This has been looked into previously and following informal discussions with the pub owners the Parish Council will not progress this at the current time.

4.0 Detailed Objections and Concerns related to the NDP Policies.

4.1 Table 1 below sets out detailed objections and concerns and the Parish Council's responses to the key points made. Included within the table of 31 comments eight respondents supported the plan but raised points which warranted a response.

Table 1 - Parish Council responses to Objections and Concerns

Reference Number	Comment	Llangarron Parish Council Response
1	<p>Our village boundaries as shown in the NDP are popular and suitable for such small villages with very few facilities and terrible road/traffic problems. We have increasing problems with flooding and river pollution - more housing causes more flood run off and pollution treat through sewage.</p>	<p>Noted.</p> <p>Refer to NDP Policies: Policy HOU1: New housing development: 7. Herefordshire Council has declared a climate emergency. Substantial parts of the parish are subject to flooding which has become more frequent and severe. It is therefore essential that where sites abut or affect a water course there must be a robust and effective system to deal with foul water and surface water run-off. In addition, where sites contain or abut a watercourse or land drainage ditch, provision shall be made for maintenance by ensuring appropriate access for clearing silt and controlling vegetation;</p> <p>Policy ENV3: Flooding Existing utility infrastructure should not be compromised, and mechanisms should be put in place to avoid or mitigate any possible pollution.</p>
2	<p>In Llangarron Parish, Llangrove is identified in Figure 4.14: The settlement which will be the main focus of proportionate housing development. Given that the housing developments in plan already exceed, by a significant margin, more that the area development requires, no more new housing plans should be permitted until the 2031 review. Existing development construction traffic continues to destroy the green verge within the village, it has, and will further exacerbated the deterioration of the main road to and through Llangrove, which is in serious need of an extensive resurfacing. The village boundaries should be retained, there is already too much traffic , especially large lorries short cutting through the village, as rat runs to and from the A40 and A49. Drainage and sewerage capacity it a problem</p>	<p>Problems with construction traffic should be referred to Herefordshire Council.</p> <p>The NDP notes the problems with traffic in Section 10. The NDP promotes more sustainable transport alternatives - see Policy TRA1: Promoting Sustainable Transport in New Developments and Policy SUS1: Sustainable Development and various other policies.</p>

Reference Number	Comment	Llangarron Parish Council Response
	<p>and quite frankly, given the concerns and special measures that previous development had to put in place (namely the 2.5 story developments by the Royal Arms), I cannot see how or why the new developments (in or of recent construction) were permitted let alone any more housing in the village of Llangrove.</p> <p>1. Llangrove is at and above it housing capacity for the facilities it has.</p> <p>2. The roads and sewerage systems are in dire need of refurbishment and repair.</p> <p>3. Those houses that have been permitted have very little green space of there own, given the low level of communal green space, so these are NOT suitable housing for young families or 1 those suitable for older residents of the village to down size to in later life. This means we are trapped in larger houses of 3-4 bed (which have substantial gardens for generational living) when an only surviving member of a household.. if we want to stay in our village community!</p>	<p>The NDP can only be used to influence future schemes and not proposals that already have planning consent or have been built.</p> <p>The NDP has to plan positively for new development and although the minimum housing target set out in the Core Strategy has been exceeded the NDP cannot put a cap on new development.</p> <p>Drainage and sewage are addressed in Policy HOU1: New housing development and Policy ENV3: Flooding.</p> <p>Refer to NDP policies: Policy SUS1: Sustainable Development</p> <p>4. New residential development should be located within the identified settlement boundaries of Llangrove, Llancloudy, Llangarron and Three Ashes and should contribute to a suitable mix of housing in terms of type, size and tenure to promote strong, balanced communities, and in particular meet the needs of young families, the elderly and people with disabilities. The precise housing mix should address the changing needs of the parish over the plan-period in order to support local community and economic wellbeing. Policy HOU1: New housing development supports a mix of house types and tenure, with an emphasis upon smaller starter homes and affordable family accommodation.</p>
3	<p>I am writing regarding Llangarron's Neighbourhood Development Plan (NDP), as I feel it is not aligned with the parishes needs. Firstly, I feel that there has been poor communication to the parishioners, informing them of when the NDP meetings are being held and the amount of time allocated to the future of the parish. My main concern is that</p>	<p>Refer to the Consultation Statement Section 4 Settlement Boundaries and paragraph 3.1 Part 1.</p> <p>The Parish Council has worked hard to engage with residents and stakeholders throughout the NDP process and has used a range of communication techniques at all stages including early informal</p>

Reference Number	Comment	Llangarron Parish Council Response
	<p>the boundary in Llangarron is set in one of the most densely populated areas of the village leaving very little opportunity for an ever-expanding population.</p> <p>The NDP states, 4.0 Vision and Objectives Objective 1 - Sustainability: To promote the creation of balanced communities with sufficient housing, business opportunities and facilities to satisfy all sectors of the community. (To be delivered through Policy SUS1 and all other NDP Policies) Objective 3 - Employment: To support existing businesses and to attract new employment opportunities in local agriculture, food production and sustainable tourism opportunities, so that jobs are provided close to where people live, and opportunities for homeworking are encouraged. (To be delivered through NDP Policies EMP1 and EMP2) Objective 4 - Housing: To ensure the provision of sustainable, energy efficient housing in the Parish which is appropriately designed to meet the needs of all sectors of the community. This will include both private and affordable sectors. The scale, design and location of the dwellings should as far as possible, reflect the character of the area and any new dwellings should be built to a high standard of design. (To be delivered through NDP Policies HOU1, HOU2, HOU3 and HOU4)</p> <p>I feel to achieve these objectives, there needs to be an opportunity for property and property prices to be more aligned with Herefordshire salaries i.e. 2/3 bedroom properties to support the longevity of the village and employment of the area. Where recent development has been granted, it only seems to have catered for the wealthy, and therefore I feel the NDP boundary contradicts the Vision & Objectives.</p>	<p>consultation such as questionnaires and planning for real, other informal consultation and 2 Reg 14 consultations. Publicity has included use of posters, flyers, email and the parish council website.</p> <p>The volume of responses to the second Reg 14 consultation (many very detailed) and number of attendees at meetings shows that many people were aware of and involved in the NDP process. Table 3 in the Consultation Statement sets out the responses from over 90 local residents.</p> <p>The process for consulting and engaging local stakeholders is set out in Section 4 of the Consultation Statement and responses. <i>'The overwhelming feedback from the community at the well-attended meetings in 2019 was that given the Parish had met and exceeded its minimum target, the settlement boundaries should be drawn to limit any further development to infill.'</i> Responses since then at Regulation 14 and Regulation 16 continue to show widespread support from residents for the settlement boundaries.</p> <p>The NDP supports new housing development within the settlement boundaries - refer to Policy HOU1: New housing development:</p> <ol style="list-style-type: none"> 1. Development should support a mix of house types and tenure, with an emphasis upon smaller starter homes and affordable family accommodation. <p>Refer to paragraph 3.1 Part 1 above. During the COVID-19 pandemic face to face meetings were not allowed. Government advice (as set out in Planning Practice Guidance) was to continue with</p>

Reference Number	Comment	Llangarron Parish Council Response
	<p>My final concern is that in this current climate, understandably, meetings are held virtually using the Zoom platform, a lot of people may not have the use of or be confident with this technology REDACTED. REDACTED. Thank you for your time & the opportunity to comment on the NDP.</p>	<p>work on NDPs and to use other forms of communication and engagement and the Parish Council sought to do this. Written responses were all considered and Zoom meetings were managed to allow limited time for individuals to speak, in accordance with Parish Council practice at that time.</p>
4	<p>We are already 50% over the target set by Herefordshire Cou cil for house building by 2031. The target is 64 houses by 2031, 101 houses have now got permission. Llangarron Parish is one of the very few parishes so dramatically 'over target', the majority of parishes are well under target and more housing growth should be centred on those parishes.</p> <p>Our village boundaries as shown in the NDP are popular and suitable for suck small villages with very few facilities and terrible road/traffic problems. REDACTED. I'm fact nearly all the houses planned or built are detached executive style homes. We have increasing problems with flooding and river pollution, more housing causes flood run off and pollution threat through sewage.</p>	<p>The NDP has to plan positively for new development and although the minimum housing target set out in the Core Strategy has been exceeded the NDP cannot put a cap on new development. The Policies in the NDP take account of the fact that the Parish has exceeded the minimum housing target.</p> <p>Refer to NDP Policies:</p> <p>Policy SUS1: Sustainable Development 4. New residential development should be located within the identified settlement boundaries of Llangrove, Llancloudy, Llangarron and Three Ashes and should contribute to a suitable mix of housing in terms of type, size and tenure to promote strong, balanced communities, and in particular meet the needs of young families, the elderly and people with disabilities. The precise housing mix should address the changing needs of the parish over the plan-period in order to support local community and economic wellbeing.</p> <p>Policy HOU1: New housing development supports a mix of house types and tenure, with an emphasis upon smaller starter homes and affordable family accommodation.</p> <p>Drainage and sewage are addressed in Policy HOU1: New housing development and Policy ENV3: Flooding.</p>
5	<p>Please find below my detailed comments on the above proposed NDP for Llangarron parish. REDACTED. REDACTED. My comments are as follows: -</p>	

Reference Number	Comment	Llangarron Parish Council Response
	<ul style="list-style-type: none"> • Quote from Herefordshire Council – “Producing a Neighbourhood Development Plan will give local people the opportunity to decide the future of the places where they live and work. This will allow the community to set out the vision for an area and the planning policies for the use and development of land, this can include choosing where you want new homes, shops, leisure facilities or employment opportunities to be built and what these buildings should look like, within your parish or Neighbourhood Area. It is important to note that plans should focus on guiding development rather than stopping it.” • The start of the NDP is contradictory on one very important point. It states that the NDP does not include any site allocations and appears to justify this on the grounds that the parish has already met and exceeded its minimum housing target. Yet the following paragraph then states that the NDP is to help local people have more say in the location, type and design of future development. I do not see how these two statements are compatible or acceptable. To suggest that there will be no development opportunities through site allocation would appear to be contrary to the NPPF and Local Plan. Herefordshire has such a shortage of housing and is not able to meet a five-year housing land supply. As the government aims to achieve faster delivery of new homes it seems incompatible that a parish NDP can wish to exclude any development potential for the next ten years. • The Vision for the plan as demonstrated through objectives 1 to 8 is excellent but the content of the plan does not support a strategy or a determination to achieve these goals. It is as if lip service is being paid to the goals 	<p>The Parish has greatly exceeded the minimum housing target set out in the Core Strategy and many residents have expressed concerns about the scale of recent developments. The Parish Council made the decision that the NDP should not include site allocations in response to recent significant housing growth, and residents' concerns about the impacts of future development in the Parish. However the Plan still supports development within the identified settlement boundaries and replacement dwellings in the countryside in Policy HOU2. It sets out a positive planning framework with policies designed to help ensure future development is sensitive, sustainable and addresses local concerns relating to flooding, pollution and traffic.</p>

Reference Number	Comment	Llangarron Parish Council Response
	<p>for the next ten years but the plan is restricting any possibility of achievement.</p> <ul style="list-style-type: none"> • Item 6.0 Sustainability. 6.2 has an intent not reflected in the plan as there is no provision to allocate sites for commercial activity or housing allocation for smaller and affordable homes. Settlement boundaries are drawn so tight so as to restrict any future development in the next 10 years. • The community highlighted a real need for smaller housing for the young and the old wishing to downsize. The population of the parish like much of Herefordshire now consists of older people many of whom are retired. Younger people are forced out of our community due to lack of jobs and housing. Any small cottages that did exist have now been extended to form the equivalent of executive or more wealthy homes. How does the plan provide for the provision of smaller or rental homes? Has Community Led Housing Development been considered? • 6.7 If retaining young people in the community is key why is there no explicit plan or strategy to develop and encourage suitable accommodation for them? This is a countryside issue in all rural communities and it is only by positive policies and action that there is any chance of achieving housing needs. All PCs should play an active role as market forces will not obtain the desired outcomes. • SUS1 item 4 is laudable goal but where is the accommodation of suitable sites for this development. Village boundaries have been made so restrictive that there is no room for any development. 	<p>The NDP does not have to include site allocations. Refer to Policy SUS1 Sustainable Development and HOU1 New housing development. The settlement boundaries allow for some limited infill development and are widely supported by local residents.</p> <p>Refer to Policy SUS1: Sustainable Development 4. New residential development should be located within the identified settlement boundaries of Llangrove, Llancloudy, Llangarron and Three Ashes and should contribute to a suitable mix of housing in terms of type, size and tenure to promote strong, balanced communities, and in particular meet the needs of young families, the elderly and people with disabilities. The precise housing mix should address the changing needs of the parish over the plan-period in order to support local community and economic wellbeing. Also Policy HOU1: New housing development supports a mix of house types and tenure, with an emphasis upon smaller starter homes and affordable family accommodation.</p>

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	<ul style="list-style-type: none"> • It is noticeable that under the Employment sector and Agriculture there should be more emphasis on up to date science especially in the area of polytunnels. It is now agreed that the plastic used when exposed to sunlight, it emits harmful gases. It also goes brittle and small plastic particulates are now traceable in our soils, organisms and our very own bodies. There is no safe disposal of plastics currently and polytunnel plastic has to be replaced on a rotational basis. Polytunnels also create monocultures. None of this is sustainable from a climate perspective. Similarly, Intensive Poultry units create considerable quantities of manure which when spread on the land is a major source of pollution within the Wye catchment. This is now being further exposed by work carried out focused in Herefordshire by the Environment Agency, Leeds and Lancashire University, Cardiff University, The River Trust and Natural England. The NDP policy should be much stronger in protecting the parish, landscape, environment and the residents. • Under Policy Justifications NPPF 8.1 d) it states - the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.' This is quoted but where is the inclusion within the NDP to support this statement? 8.3 Thus, to help achieve economic growth, local plans including Neighbourhood Plans should be prepared to meet the development needs of business and support an economy fit for the 21st century. The above are clear statements but what positive part of the plan is facilitating this need? A Plan should be about delivery not a nice to 	<p>Noted. The NDP has to balance the national need to improve local / UK food production with local impacts on landscape / biodiversity etc. Refer to Policy EMP1: New agricultural buildings and poly tunnels. The NDP has to plan positively and cannot put a moratorium on such development in the future. The PC were advised to include a polytunnels policy, not to encourage such development but to ensure that any such application would be sensitive and would address important criteria. The NDP cannot demand a change of farming practices, however policy EMP1 sets out strict conditions which must be met by applicants for large agricultural buildings and poly tunnels. These issues are becoming more prominent nationally and there may be further guidelines and legislation to control polluting plastics and animal waste in the future.</p> <p>Refer to NDP Section 11.0 Community Facilities and Policy CSU1: Protecting Existing Community Facilities and Supporting Investment in New and Improved Facilities. The suggested list of improvements was identified and supported in community consultations. Funding may be identified through means other than developer contributions such as through the National Lottery and other grants etc.</p>

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	<p>have list. What is included in the NDP to make this a reality? Omissions of this type will not help deliver what is needed for a future vibrant and sustainable community.</p> <ul style="list-style-type: none"> • The plan as constructed does not guide development for the next 10 years but has been constructed to stop any development by not including potential sites although they have been put forward by land owners and identified by independent assessment. • There has been insufficient public consultation with no research into community needs. There have been no “Town Hall” style meetings for residents to hear from the authors any reasoning behind the proposed plan or for the parish council to hear public opinion.. This did happen with the first Reg 14 plan in 2014 but none has occurred with the second Reg 14 proposal in 2019/20 or since. • Some questions about the plan and settlement boundaries were asked on the PC website but there were less than 10 responses to the questions REDACTED. This disadvantaged anyone who did not see the PC website or who did not have internet access. • Ability for residents to comment was restricted to a small number of PC meetings held at night and on each occasion the time limit for the whole parish was just 15 minutes and the PC did not allow dialogue or give answers. This once again disadvantaged anyone who did not have private transport or time in an evening pre Covid. During Covid lockdowns it was only possible via Zoom which again 	<p>The Plan includes a range of policies to support and guide development proposals. It does not stop development.</p> <p>Refer to the Consultation Statement section 4 and paragraph 3.1 Part 1 above. There has been extensive and wide ranging public consultation and engagement throughout the NDP process, including open meetings. COVID-19 restrictions have meant that some meetings have been held online, but responses in writing were invited and all written responses and comments have been considered very carefully - see tables in the Consultation Statement. The high level of responses during the second Reg 14 consultation process are testament to the significant level of engagement in the process locally.</p> <p>See paragraph 3.1 Part 1. A large number of residents attended NDP meetings in 2019. The time allocated to discussion was not limited to 15 minutes, each item was discussed and contributions invited.</p> <p>Refer to Consultation Statement 4.0 Settlement Boundaries. Refer to responses at Reg 14 and Reg 16 - there is a high level of support locally for the settlement boundaries as shown in other residents' comments.</p> <p>The Parish Council had to limit the time in meetings for individuals to speak or meetings would have been unmanageable, however all members of the public did have time to speak. The meetings were managed so that a small number of contributors did not dominate.</p>

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	<p>disadvantaged anyone without internet or strong internet connections. This particularly placed older residents outside any discussions and with no information. (Prior to the current council a series of open days at weekends in different locations allowed a conversation between parishioners and those that were drafting the NDP. None of this has happened in the last two years).</p> <ul style="list-style-type: none"> • The plan has been constructed by REDACTED • It appears that Llangarron especially has been protected from development at the expense of other settlements in the parish. <p>• The only research carried out confirmed a requirement for affordable housing and one and two bedroom houses/flats for young people and for older residents wanting to downsize. This must surely be a housing requirement over the next 10 years of the Local Plan but the PC has totally ignored this requirement and made no provision to meet this housing need.</p> <p>• Young people are being forced out of their family communities as older retirees come into the parish extend houses and make them so valuable that young local workers cannot get rental property or get a foot on the housing ladder. This is such a serious issue which must be addressed and be part of a ten year NDP.</p> <p>• Whilst appreciating that the PC is constructed as a result of a democratic process REDACTED. REDACTED. The construction and content of the NDP reflects contentment of the status quo and there is no aspiration to meet the needs of future generations.</p> <p>• The proposed village boundaries are not logical nor do they take into consideration the history of the villages,</p>	<p>Members of the public have praised the conduct of these meetings. (see responses from the public) All stakeholders were invited to submit written responses and these have all been considered carefully at each stage of the NDP process. Refer to 3.1 Part 1 above.</p> <p>All relevant settlements identified in the Core Strategy have identified settlement boundaries. No settlement has had preferential treatment. Refer to 3.1 Part 12 above.</p> <p>See 5 above. Refer to NDP Policies SUS1 and HOU1.</p> <p>Refer to other responses from residents supporting the settlement boundaries.</p>

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	<p>developments already approved and essential buildings such as Llangrove Village Hall which has been exclude. The entire north/west – south/east axis of Llangarron boundary as proposed excludes two sets of council housing at either end of the village and the last village pub (now closed) and the two main industrial business sites in the village. It seems very strange that an entire area of exclusion from the settlement boundary REDACTED.</p> <ul style="list-style-type: none"> • The History of the Parish 3.1 tp 3.18 seems to paint a rural idyll and rather omits the slow demise of Llangarron as it lost its shops, pubs and school. Smaller houses and cottages have been extended into much larger dwellings and there is today a shortage of housing for first time buyers, a shortage of affordable housing and smaller housing. This situation also denies the ability of older residents to downsize and stay in their lifelong community. It could be suggested that during the last forty years the lack of local housing has been a reason for the failure of viable local amenities. One result has been the migration of young people from our parish to urban settings for both housing and jobs. Evidence of this is well recorded by Herefordshire Council's (HC) own survey in which it illustrates the high average age of those now living in our communities. If our parish is representative of the statistics held by HC then approximately 40% of our parish are over the age of 60 and as a rural parish it may even be higher. This statistic marks Herefordshire out has having one of the oldest county populations in England and the trend is continuing. This is not highlighted in the plan nor is it considered as an important factor to be considered for development over the next 10 years. 	<p>Refer to paragraph 3.1 Part 9 above.</p> <p>The NDP has been written to reflect local character and issues which are important to residents and stakeholders. Loss of community facilities in rural areas is a national issue but the NDP seeks to protect remaining facilities and the level of recent housing growth in the Parish should help to sustain them in the future.</p> <p>NDP policies support a suitable local mix of housing and promote housing for young people such as smaller starter homes and affordable family accommodation in Policy HOU1 and Policy SUS1.</p>

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	<ul style="list-style-type: none"> • Two of the most important areas for truly sustainable development in today’s world are Transport Links and High Speed Broadband. Both act as catalysts for work and wellbeing and should be considered for much greater expansion within the NDP document. Many parish councils have invested in community schemes for local transport to varying degrees to the provision of high speed broadband and in some cases shops. There seems to be no ambition to supply the building blocks needed for a sustainable parish and community even if the concepts are well understood. • Policy ENV1 This should be the most important section of the NDP given the Climate Emergency now recognised by the majority of scientists and governments around the globe and our very own Herefordshire Council. This section needs to be considerably expanded. There is pressure not to cut back hedges and verges unless they are a safety hazard. Many wildlife and conservation charities are bringing pressure on government to no longer desire our countryside to be shaped and manicured but for even small parts to be rewilded including gardens. New planning regulations under consideration and the new agriculture bill including ELMS will influence greater consideration for the environment. The Llangarron NDP is a great opportunity to raise such issues as insulation, improving housing stock, electric vehicle charge points and green energy. Community transport initiatives backed by the PC would reduce the reliance on the car. • Our biodiversity loss over the past 30 years is extensive as can be reviewed in the 2020 WWF Living Planet, Environment Agency - The State of the Environment June 	<p>Refer to Policy COM1: Communication. The NDP notes that the Community Hub have an aspiration to look at community transport solutions for the parish (see para 10.10). Provision of local transport, broadband and shops by parish councils largely lie outside the scope of planning policies.</p> <p>The NDP has a range of policies to promote sustainability and to protect landscape and biodiversity. Refer to SUS1 Sustainable Development and ENV1 Landscape and biodiversity.</p> <p>Statutory consultees Historic England have praised these policies - see paragraph 2.4 above. Natural England did not submit any objections to policies.</p>

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	<p>2019 and State of Nature Report 2019. Our two main brooks the Garron and the Gamber fail significantly on Phosphate pollution but there is nothing in the plan highlighting this or any mitigation for it. The Garron floods regularly at Llangarron but there is no formal plan for flood mitigation to address the issue. Our brooks as mentioned above are dying ecosystems due to agricultural runoff during intensive rainfall. Their gravel beds are now covered in silt but this is not mentioned within the NDP. Surely a programme to rectify this situation should be part of a community NDP. Pollution in the Wye catchment is now at an all-time high due mainly to water run-off from agriculture including chemical nutrients. It is estimated that at least 75% is caused by agriculture (See EA documents - Herefordshire Nutrient Board minutes). In other EA reports it confirms the status of pollution within the Garron and Gamber brooks. It shows the health of both in 2013 was good but now both are Poor for Ecology and Fail for Chemical pollution. One of the main causes shown in this report is for poor nutrient management and the reason is Agriculture and rural land management. These streams then contribute to the overall health of the Wye. It is the rivers and streams in the Llangarron Parish that are significant contributors to the Wye pollution.</p> <ul style="list-style-type: none"> • Perhaps there should be a desire that all land that is developed has to have landscape improvement on a similar or suitable scale with planting required in places that will slow water runoff. Changing agricultural practice in Herefordshire away from pasture and orchards to potatoes and maize for bio digesters is accelerating soil erosion and nutrient run off. What is our parish plan to improve these 	<p>The NDP cannot influence land management / agricultural practices. The environmental policies have been supported by statutory consultees and some had no comments.</p>

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	<p>aspects of the environment and can a more insightful and directional NDP policy help?</p> <ul style="list-style-type: none"> • Within the Landscape and biodiversity section would it not be good to also consider a section on the use of plastics and building materials in our parish. Micro plastics are now in the micro-organisms of the soil, our wildlife and in ourselves. The longer term effects are unknown but scientists consider them to be dangerous. All plastics degrade and pollute and as such we should no longer consider Polytunnels as acceptable in our parish for health and pollution reasons. What leadership can the parish council give through the NDP to have a much needed and stronger environmental section? • We are an agricultural county but recent changes from small family owned farms to large Agri-industry multi-million pound companies have brought considerable change. Is it time that Parish Councils took a much greater interest in agricultural planning applications. There has been a considerable increase in the numbers of bio digesters that have received planning consent in recent years. Maize is considered one of the best ingredients to fuel these. As a result, maize production has grown exponentially over the last 20 years. (Soil Association Report). It is now estimated to be over 200,000 hectares in 2020. It has a devastating impact on soil and water and is probably a significant contributor to pollution in our waterways. It is clear to all that during sustained rain, water runoff is a major cause of flooding and soil erosion in and around Llangarron. Although this is a problem that effects the whole community and cuts off parts of the Parish this issue is not headlined as it should be within the NDP. 	<p>Noted. These are national / international issues and may be addressed through future regulations / law outside planning policy.</p> <p>Refer to Policy ENG2: Proposals for New Renewable Energy Technology. NDP planning policies cannot control choice of crops grown. However the NDP does consider flooding - see Policy ENV3: Flooding and Policy EMP1: New agricultural buildings and poly tunnels also provides guidance. These policies are supported by statutory consultees or there were no comments.</p> <p>The NDP supports agricultural diversification and the tourism industry and home working in Policy EMP2.</p>

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	<ul style="list-style-type: none"> • How can the parish council through the NDP help target agriculture for better and responsible land use and stop the damage caused by flooding and our biodiversity loss? The recent government consultation paper on Environmental Land Management Scheme (ELMS) should empower the parish council to a much bolder and more progressive stance in this section. • Although the NDP suggests “A large proportion of residents in the Parish are still employed in agriculture or agriculture related enterprises” this assertion must be challenged as it does not agree with Herefordshire Councils published employment information. It is only a very small percentage of the Herefordshire workforce that is employed in agriculture and this is decreasing. Retail, Health, Manufacturing and Tourism each employ considerably more. Tourism spreads the income and profit obtained across the whole community. This is unlike agriculture where few are employed and the profits reside with one person, the land owner. For this reason, a greater emphasis should be on tourism and facilitating home working and perhaps making provision for start-up business hubs. One key element of sustainability is living and working in your local community and it helps battle climate change by reducing travel. This cannot just be left to big government but should be part of local councils plans and aspirations. This is not evident in the current NDP. • EMP1 Buildings and Polytunnels This whole section needs to be strengthened in light of emerging science and changing government policy (ELMS). Climate Change, pollution and soil erosion impact should be an essential part 	<p>See comments above on Policy EMP1. This policy endorsed by statutory consultees or there were no comments.</p> <p>The NDP notes changes in working patterns and employment. Refer to Policy EMP2: Tourism and rural diversification. This policy endorsed by statutory consultees or there were no comments.</p> <p>The Submission NDP cannot be substantially altered at this late stage or include new content but the Examiner may recommend changes to ensure the NDP meets the required basic conditions. A future review of the NDP may offer opportunities to consider some of these matters</p>

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	<p>of your guiding light. All plastic is now considered a considerable pollutant.</p> <ul style="list-style-type: none"> • 8.15 Communication Technology. This section is vital to community engagement and future sustainability and must be acted upon to ensure our parish is fully served by Fibre broadband. This is not just something to have written and forgotten about. REDACTED. The PC must keep pressure on all parties as required to ensure this critical service is available to all. • Tourism 8.16 onward. Tourism is a growing and essential part of Herefordshire’s economy. It is estimated to be worth over £500m per annum which is greater than the agriculture sector. It is also unique in that this income is spread throughout the community and not held by a small number of industrialists or land owners. Every pub, hotel, B&B, shop, garage, tea room and attraction has the chance to benefit. It is therefore vitally important that our NDP does everything it can to promote and support this aspect of Herefordshire. Policies must actively support more Tourism in the parish. • Housing A housing need has been established for smaller and affordable housing. This was the result of parish council research 4 years ago. A Leeds Beckett University research document has highlighted precisely that we are not looking at “housing need” when preparing plans but as an unintended consequence allowing developers and land owners free charter. The power of their position is enhanced by lack of a Five Year housing land supply in Herefordshire which has now deteriorated to 3.69 years. As a need for the agreed size and scope for housing within the parish has 	<p>in more detail, provided they are supported in national and Herefordshire level policies.</p> <p>Refer to NDP Policy COM1 and Paragraph 3.1 Part 18 above.</p> <p>See above.</p> <p>The housing supply in Herefordshire has now improved to 4.2 years (see Paragraph 3.1 Part 10 above). Llangarron Parish is now significantly over the ‘minimum target’ having exceeded it by over 60%.with commitments and recent developments</p>

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	<p>been identified the NDP should demonstrate, how and where the need is to be met. If the parish council wants to direct future development it must demonstrate how this will be achieved.</p> <p>• 9.24, 9.25, 9.26 These sections are being REDACTED to the Llangarron Community. There has been no meaningful consultation and members of the public were very restricted in the time allotted for comment. Why have there been no open days where all members of the community could attend say over a weekend and meaningful explanation and discussion taking place with the parish councillors. Such open days are the most common practice when NDPs are being formulated. Since May 2019 only approximately 5 Parish Council NDP meetings have taken place and been recorded. All took place in the evening in a standard PC meeting format. At no time has any open house or dialogue forum been set up that would allow many more parishioners to attend at differing times. This process considerably disadvantaged the majority of the community who could not attend evening meetings. One small invitation to comment on parts of the plan was limited to items on the PC website which few people knew about and many no access to. As a result, the responses were less than 5 to three parts of the questions posed with not one making double figures in reply. The PC could and should have made a much better effort to explain their plan and sought a broader community response. Had the PC done so this Reg 14 revision could have been much more complete, and reflected a higher percentage of community views. It is very disappointing the PC did not heed this call.</p>	<p>Refer to Paragraph 3.1 Part 1 and the Consultation Statement. The PC and the vast majority of respondents do not support this view.</p> <p>The relevant policies are supported by statutory consultees or there were no comments.</p> <p>Refer to the Consultation Statement for more detailed information about how the Plan has been prepared through various stages of informal and formal consultation and engagement. The high level of responses at Reg 14 and Reg 16 indicate a significant level of community engagement in the process.</p>

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	<ul style="list-style-type: none"> • There appears to be a REDACTED to try and restrict development in the parish which is eluded to in the NDP. The plan would have benefitted by being more open and fairer with landowners REDACTED. Then there would be a much greater chance of harmony in the community and more chance of influencing the housing types being built to meet community needs which have been identified. • It can be said that Planning and NDPs engage with people who do not want more housing but as a result this excludes people who actually need housing. REDACTED • 10. Roads & Traffic TRA1 Promoting Sustainable Transport The PC should incorporate an initiative to help provide sustainable transport on a community basis. Many PCs in Herefordshire have already taken positive action to help fund this. Such actions are far better as part of a cohesive plan rather than bland words. There is little to gain with an aging population in a hilly environment on insisting upon Bike Sheds. New developments should also be encouraged where the best road access routes exist and those with the best public transport links. Cars will be the main mode of transport over the timeframe of the NDP and this point should be acknowledged in all planning aspects such as charge [points and adequate parking. Increased delivery transport is also now a key aspect of any transport policy. (Road volumes and adequate turning facilities). • Community Facilities Policy CSU1 Consideration should be given to the formal protection of the Royal Arms Public House through a Asset of Community Value. It is the last pub in the parish and is for many at the heart the community. This should be discussed with the current 	<p>The NDP plans positively for development and seeks to provide a balanced framework to support future change which is sensitive to local issues and needs.</p> <p>Such community transport initiatives are not part of and NDP but would be considered by the PC</p> <p>This has been considered by the Parish Council. The Public House is currently a thriving and popular business. The respondents have not discussed this with the owners who are opposed to such an approach. Other community facilities will be considered as appropriate and do not have to feature as specific proposals in the NDP.</p>

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	<p>owners. A further issue must be the longer term resolution around the churches in our parish and those under the auspices of our local vicar. With low attendance figures and high maintenance costs there is a very real viability issue. Llangarron Church now needs substantial funding to carry out repair work on the tower. It is far better to have these buildings on the PCs radar now rather than waiting until it is too late. How can our churches be used so as to generate income? What is the future of our churches and how can they be protected if desired as community facilities?</p> <ul style="list-style-type: none"> • ENG 1 and ENG 2 Renewables. Community based renewable energy projects attract significant government support and may also facilitate access to funding. The PC should have a more proactive policy in promoting community led solutions to renewable energy. In many instances public access buildings can benefit with free or low cost energy supply as part of a community initiative. All of this is separate from any encouragement of renewables on new builds which should be as energy efficient as possible. The Climate Emergency should trump all other policies REDACTED. Everyone has a general support for renewables until REDATED. We cannot and must not expect our energy use to be placed on other community's doorsteps. To meet any Net Zero target, by the years 2035 to 2050 we all have to take very tough decisions on how we live our lives. It is the future generations we hold in the palms of our hands. It is true to say that our energy supply and usage is more important than our landscape in many cases. We need to strive for the best and reach compromise. 	<p>The NDP addresses climate change in several NDP Policies including Policy SUS1 Sustainable Development, Policy ENV1 Landscape and biodiversity, Policy ENV3 Flooding, Policy ENG1 Proposals for Incorporating Renewable Technology in New Developments and Policy ENG2 Proposals for New Renewable Energy Technology. The relevant policies are supported by statutory consultees or there were no comments. Large scale renewable developments were very unpopular at public consultation and not included in the NDP. Small scale domestic renewables are included.</p> <p>These would be actions for the PC, individuals and other bodies rather than a planning policy.</p>

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	<ul style="list-style-type: none"> • This appears to be a REDACTED NDP should and could be strengthened to the advantage of our community in the areas indicated. The disappointment is that there is no demonstrable aspiration or positive plan on how our community can develop in the next ten years. If the single goal is to lockdown where we stand today with no development ideas, we are simply trying to preserve the status quo in aspic. History teaches us that this position is impossible. It may also not meet with the requirement of the Local Plan • Together the PC and our community are the custodians of the parish for future generations. We need to consider and influence the jobs, housing, amenities and wellbeing for future years. This NDP has not addressed the future but is seeking to preserve the past. The draft NDP is constructed in a safe and plain way. We need to show more desire for improvement and delivery for those less fortunate or without, as yet, the monetary power REDACTED. We should not be denying opportunity for future generations to prosper in the Llangarron Parish; we should have a plan to facilitate it. • Housing, why is the data driving housing need and community response so old. When undertaking the revised Reg 14 consultation there was every opportunity to seek more up to date public opinion on housing needs within the community. It seems folly to be using data gathered 5 to 6 years ago. Public consultation seems REDACTED by the current parish council with no open days for comment REDACTED. 	<p>See Consultation Statement Section 1.</p> <p>Not accepted. The Plan will be used to help determine planning decisions up to 2031.</p> <p>Not accepted. The housing policies, as with others were informed by extensive community consultation throughout the process.</p>

Reference Number	Comment	Llangarron Parish Council Response
	<ul style="list-style-type: none"> • 9.24 is very limited REDACTED and mis leading. There was no considered discussion with the community. Discussion time was limited to the regular 15 minute slot for the public to comment. Many of those who wished to have a true consultation did not get to comment and the PC had REDACTED. REDACTED. • Why has Llangarron Village Hall been listed as an important local community facility (supported by 93% of the community) yet whilst adjacent to it has not been incorporated into the village settlement boundary? • Why has the Reg 16 review not been highlighted and posted on the Parish Council website and the community advised to review this draft and send comments into Herefordshire Council and for the regulator to consider. REDACTED. • The lack of real mand meaningful consultation on the whole NDP with its community is the REDACTED of the whole process. Whilst recognising that Covid has placed its own restrictions on the process there were no meaningful consultations with the public between May 2019 and March 2020. REDACTED. What REDACTED public opinion have been sought have been REDACTED so as to appear the community has been consulted. At one PC/NDP meeting on 15th July 2020 it was arranged as a “Training” session on NDP REDACTED. The public was excluded from this meeting on the grounds that it was Training. REDACTED. Under a FOI request emails have also now established the above to be true. This was not consultation REDACTED. There is no question much of the community feels excluded and not consulted on this NDP. 	<p data-bbox="1200 775 2074 836">See Paragraph 3.1 Part 9. Refer to decisions about the settlement boundaries in the Consultation Statement.</p> <p data-bbox="1200 946 2119 1007">See Paragraph 3.1 Part 2. The responsibility of Herefordshire Council There were a significant number of responses.</p> <p data-bbox="1200 1150 1962 1211">The policy wording has been informed by the responses to consultations throughout the process.</p>

Reference Number	Comment	Llangarron Parish Council Response
	<ul style="list-style-type: none"> • It can be said that Planning and NDPs engage with people who do not want more housing but as a result this excludes people who actually need housing. REDACTED. 	<p>Refer to Consultation Statement paragraph 2.10 and paragraph 3.1 Part 1 above. This is not the case but has been stated by objectors through the process. Public speaking time is controlled at Parish Council meetings or meetings would be unmanageable.</p> <p>See Consultation Statement Sections 2.10 and 2.12, also Paragraph 3.1 Part 6. This is not the case. This concern has been made repeatedly by the same individuals. All aspects of the plan were brought to public meetings and voted on in public.</p>
6	<p>For the Inspector of the Llangarron NDP reg 16. One of two emails.</p> <p>Please ensure the Inspector views the email following this one also with the FOI proof that the so called Training Meeting on the 15th July 2019 was in-fact a Parish Council unminuted meeting. A neighbourhood Development plan is as it says, primarily a tool to guide development in a Parish to where best suited with input from local residents and landowners of the whole Parish. This NDP submitted is not designed to guide rather to stop development in parts of the Parish most especially Llangarron Village.</p> <p>REDACTED does not consider the future needs of the Community for example considering smaller housing for young people and the older generation to stay in the village or rental housing for future generations but rather to keep the status quo for Llangarron village to stay still. There is very little about climate change and what we need to look to for the future that we face.</p>	<p>Refer to the Consultation Statement paragraph 2.10 - 2.12 and Paragraph 3.1 Part 1 above. The NDP has been prepared through and extensive process of consultation and engagement and residents and stakeholders have had many opportunities to submit comments, all of which have been considered carefully by the Parish Council.</p> <p>Refer to Policy SUS1: Sustainable Development 4. New residential development should be located within the identified settlement boundaries of Llangrove, Llancloudy, Llangarron and Three Ashes and should contribute to a suitable mix of housing in terms of type, size and tenure to promote strong, balanced communities, and in particular meet the needs of young families, the elderly and people with disabilities. The precise housing mix should address the changing</p>

Reference Number	Comment	Llangarron Parish Council Response
	<p>What about a Community transport scheme just what the Parish needs for the future and also green spaces and local community support groups for the large number of people now suffering from mental health disorders, anxiety and addictions? Also support for new young parents and elderly in the villages. Perhaps lunches for the elderly and lonely in The underused Garron Centre and where will they park? REDACTED.</p> <p>The public then not being given details of how the decisions were made and by whom. In fact not even any open debate between the Parish Councillors themselves at the meetings. Appearing to the public that these decisions have been discussed beforehand REDACTED. Notably the public at the meetings being banned from giving their opinions as told public time is over. The public only have ten minutes in meetings to speak, it was fifteen but was soon shortened to ten and 2 minutes each and only at the start of each meeting. At the very start of each meeting The Chair reads out that there would be no two way conversations between the public and the Councillors at public time! We have spent many a meeting speaking at the open time for our allotted 2 minutes but never get any feedback or answers, at the time, or at the next meeting, or to emails REDACTED. The preferred response is “ thank you we have noted your comments” REDACTED. After the short public time of 10</p>	<p>needs of the parish over the plan-period in order to support local community and economic wellbeing. Also Policy HOU1: New housing development supports a mix of house types and tenure, with an emphasis upon smaller starter homes and affordable family accommodation. The NDP contains a number of environmental policies which address climate change and a low carbon agenda and these have been supported by statutory consultees or there were no comments.</p> <p>The NDP notes that the Community Hub have an aspiration to look at community transport solutions for the parish (see para 10.10). Provision of local transport, broadband and shops by parish councils largely lie outside the scope of planning policies. These are possible actions rather than planning policies.</p> <p>This is not the case. Refer to the Consultation Statement and Reg 16 paragraph 3.1 Part 1 above.</p> <p>There are time limits on public speaking at Parish Council meetings or meetings would be unmanageable. All members of the public were allowed to speak and no one person was permitted to dominate the proceedings. All written comments and responses have been considered carefully throughout the NDP process.</p>

Reference Number	Comment	Llangarron Parish Council Response
	<p>minutes Councillors just vote through everything later on in these meetings and if we try to speak up then we are shut down and told open time is closed so no public speaking is permitted.</p> <p>Regulation 14 REDACTED with residents not being aware that there was anything about the NDP online. I didn't see any notices of relevance around the Parish to encourage people to comment. Not all residents are able to go online especially the older generation who have lived in the area all their lives and with no open hall meetings how could they have a say. I would like the inspector to look at the Reg 14 comments so he can see around 2-10 at the most comments, if he can manage to even find it on the Parish Council web page? It's under NEWS UPDATES and not NDP I would request that the Inspector looks at this section on the PC web pages. My comments have never been answered to this day although it is written at the top: Please note that public comments and emails sent to the Llangarron Parish Clerk will be considered by the Parish Council and feedback will be provided in public meetings during the NDP process. NAME REDACTED BY PC. We actually asked for responses to our comments we had made at Reg 14 at the following meeting. The PC managed to somehow not answer by saying we would have chance later on in the process! I said that NAME REDACTED BY PC had written that we would get a chance and we were just dismissed with no answers by the Chair. REDACTED. This has been the case since the new PC were formed in May 2019, before that between 2017 and 2019 we were treated with respect as landowners and given time. How can the public be heard regarding the development of the NDP</p>	<p>This is not the case. All relevant notices were posted in the Parish. Refer to the Consultation Statement and paragraph 3.1 Part 1 above.</p> <p>The high number of responses to the Reg 14 consultation demonstrates a significant level of local engagement in the Plan's preparation and there was a high proportion of support for many of the policies.</p> <p>The consultation was promoted in a range of ways. Notices were put up on Parish notice boards and flyers were delivered to local households. The consultation was promoted on the Parish Council website. Hand written responses were invited as well as online responses.</p> <p>The 'new' PC was not 'formed' but voted for by Parishioners in an election in May 2019.</p>

Reference Number	Comment	Llangarron Parish Council Response
	<p>when PC meetings are conducted this way and it's the only time we can voice our concerns.</p> <p>It says in the guidelines that landowners should be approached but we have 'never been approached' since the new P C came into office in May 2019 and are shut down in meetings. This is not democratic or transparent in any way and not how a plan should be written.</p> <p>Since the new PC were formed in May 2019 there have been no proper open meetings, planning for real events or where everyone who wished could get together and have an open debate. Although there was the chance before Covid became real in March 2020. What was needed was the hire of a large school or village hall with plenty of advertising to get all the large 'Parish' together and have a proper minuted and recorded debate. None of this has happened.</p> <p>REDACTED. Is it legal that the Chairman of the PC REDACTED? Then saying to all that the decisions have all been voted on. Yes by the Chair and half a dozen Councillors who vote out of public speaking time at meetings so no interested parties can have any input. It is basically REDACTED and I think this added with a meeting that they say was a training meeting warrants a Legal Challenge. On July15th the public were told the PC were having a training meeting then we hear that as soon as it starts REDACTED REDACTED. The Inspector will have noted this.I think the Inspector will receive many representations from professional people to say this definitely is the case as shown by freedom of information. Please see my following email. Emails following the</p>	<p>Refer to the Consultation Statement and paragraph 3.1 Part 4. There was a Call for Sites and Sites Assessment process from 2018 - 2019. The public, including landowners were invited to comment on the Technical report.</p> <p>This is not the case. Refer to the Consultation Statement paragraph 3.1 Part 1. There have been numerous open Parish Council meetings throughout the NDP process and over many years when members of the public could attend and ask questions. NDP meetings were in large halls with over 100 people attending in some cases. All meetings were minuted.</p> <p>All processes were followed properly in meetings. See Consultation statement and Reg 16 comments overview item 1. The Director of HALC was present and clerked at NDP meetings, praising the well-run meetings.</p> <p>During COVID restrictions the Parish Council followed advice in PPG - see paragraph 3.1 Part 1 above. Although face to face meetings were not permitted, all written responses to consultations were considered carefully and many were used to inform policy wording and supporting text.</p> <p>The Parish Council is the legal body responsible for preparing the NDP and has made decisions accordingly. Minutes of meetings (and agendas) are provided on the PC website. See paragraph 3.1 Parts 1 and 6.</p>

Reference Number	Comment	Llangarron Parish Council Response
	<p>REDACTED training meeting on the 15th July 2019 on my second email. This is proof that it was a Parish Council meeting not a training meeting that was not minuted and big changes were made without the residents and landowners being present. We still have not been told what was changed at that meeting before we were allowed to see the plans. REDACTED. The Llangrove residents are fed up with the majority of development all up at Llangrove given the roads out of Llangrove will not accommodate more traffic. The development in the Parish is nowhere near proportionate. Llangarron Village needs more houses as almost nothing built in the last 50 years and even now Llangrove is still having to shoulder the bulk of development, contrary to the wishes expressed in the Planning for real event back in 2014/15. This means that many residents will vote through this manipulated plan through for the sole reason and desperation for a boundary around their village of Llangrove. If passed this so called Development plan will restrict housing in Llangarron to 2031 and there will be no availability for the young families or rental properties which what the village of Llangarron needs to meet the needs of all of society not just the wealthy! We appreciate that the 67 housing target has been exceeded but would like the Inspector to study where these houses were and are being built, remembering that the two main settlements are Llangrove and Llangarron, Llangarron being in the centre of the Parish with good road links to the A40 and M50 low visual impact due to its low elevation and a natural green space (flood plain) in the centre which would make an excellent recreation area. Also the village hall and the lottery funded Garron Centre are desperately under used unlike the village hall at Llangrove that is very difficult to book up and there is something going on every evening.</p>	<p>See paragraph 3.1 Parts 8, 9, 10, 11, 12 and 13 above.</p>

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	<p>Why can't Llangarron village be like that? I was born in the village, went to school in the village and have watched the decline of the village with everything closing, pub, school, shop, garage and all the clubs etc etc. Now is the chance at last for it to grow and thrive again with a sense of community which has been lacking over the past years. We now have our small development passed on my parents farm and our daughter and family living in a rental property now building her forever home in the village. We have no ideas of developing further in the next 10 years but feel strongly for other small developments that are being turned down based on the very tight and restrictive boundary which is not at all correct excluding most of the village and also not consistent with the boundary for Llangrove as highlighted by HCC in 2017. We don't even know who drew this tight boundary!? Please find a copy of 6 emails : These six emails are to follow on a further email. Many thanks and please send a receipt of receiving this email and the following one</p>	
7	<p>1. What do the small black arrow marks denote or mean on MAP 3 on VIEW 2 and VIEW 3. They do not appear anywhere else on the maps? I have placed a red ? mark as reference on page 21 (MAP 3) regarding the black arrow pointing to the blue arrow of VIEW 2 (page 19/21 attached) 2. On MAP 3 as seen on page 21, the blue arrow denoting VIEW 2 has been positioned incorrectly. It currently implies VIEW 2 starts through the middle of a 12ft high solid hedge! I have made a note (see red circle) of where VIEW 2 appears to be based which is some 20 metres further up where there is a private field entrance. This will require correcting/updating. 3. Is there a reason why the MAPS of all the Important views are of poor quality/ancient compared</p>	<p>The small black arrows may be drafting errors from a previous map and can be removed in the Referendum version.</p> <p>The PC may wish to improve the map.</p>

Reference Number	Comment	Llangarron Parish Council Response
	to other modern maps of higher quality used in the NDP such as Parish Boundaries?	
8	I am very concerned that public consultation with residents has not happened in the way it should, especially during these Covid times, but also before this last year of Covid. We were consulted a number of years ago but have not been kept informed of more recent developments and proposals for the plan. It seems that plans are being slipped through without the relevant villagers being aware of changes being made, and with little thought to future appropriate developments to keep our villages alive and suitable for younger and less wealthy residents. Surely some public meetings should be held to inform and discuss with the people who it affects what is the best way forward?	<p>Refer to the Consultation Statement and paragraph 3.1 Part 1 above.</p> <p>There have been several opportunities for residents and stakeholders to take part in consultations on the NDP and the high volume of responses at the Regulation 14 and Regulation 16 stages indicate a significant level of local engagement in the process.</p> <p>COVID restrictions meant that face to face meetings could not be held in recent months. However the PC has considered all written responses very carefully.</p>
9	LLangrove's boundaries must be closed to prevent any further planning/building in this village. The village has far exceeded it's target for housing. Traffic on the narrow village road is becoming dangerous (no pavements). Village road is used by walkers, children, recreational cyclists and horses. Two shoppers buses a week from the village (one to Ross, other to Monmouth) means private cars are the only form of transport in and out of the village. It is imperative that further development is stopped.	Refer to the NDP settlement boundaries and Policy HOU1. Traffic is addressed in Section 10 and Policy TRA1: Promoting Sustainable Transport in New Developments.
10	<p>My comments are limited to my own experience and understanding of the NDP process and contents with regard to Llangarron PC REDACTED since Feb 2020. I have received information REDACTED. I do not have direct experience of this. REDACTED. I myself have reservations about the NDP Reg 16 consultation version which I will list below REDACTED.</p> <p>My concerns: In my opinion the PC has not taken seriously enough its potential to take action to mitigate against</p>	<p>Refer to the Consultation Statement.</p> <p>The NDP addresses climate change in several NDP Policies including Policy SUS1 Sustainable Development, Policy ENV1 Landscape</p>

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	<p>climate change, ecological and air quality impacts in the NDP instead concentrating on flood risk and water quality which although very important issues for the area are not the only issue it could influence. Surprisingly the NDP (Environment Report) is assessed as a having neutral or positive effects on the points 5,6,7, and 8 in SEA (as listed below) with no active or planned actions other than Policy ENG1: where the terminology used is not as 'binding ' or even encouraging as it could be ie 'Where appropriate or where possible all proposals for new development including change of use should incorporate renewable energy technologies' SEA objectives specifically: 5 To improve air quality 6 To reduce the effect of traffic on the environment 7 To reduce contributions to climate change 8 To reduce vulnerability to climate change There are inconsistencies in building commitments included in the NDP, it is not fully comprehensive or accurate in its current form which may lead to an underestimation of current housing stock commitments against housing targets which have already been exceeded. This should be regularised before publication.</p> <p>1 The settlement boundary for Llangarron does not include the community centre (Garron Centre) which seems a strange omission considering its value and potential importance to the immediate community. Item 6.0, Sustainability 6.2: suggests an offer of future sites for planning, but this is not seen in the plan, as there are no allocated sites for commercial activity or future housing allocation, particularly for small or affordable homes or homes for rent which is an unmet target for the neighbourhood and the wider area of Ross on Wye. This should be addressed.</p>	<p>and biodiversity, Policy ENV3 Flooding, Policy ENG1 Proposals for Incorporating Renewable Technology in New Developments and Policy ENG2 Proposals for New Renewable Energy Technology.</p> <p>Relevant statutory consultees have supported these policies or made no comments.</p> <p>The settlement boundaries have been informed by public consultation and are supported by many residents - see responses to the Regulation 14 and Regulation 16 consultation. The Garron Centre is attached to the Grade I Listed Church and is in the settlement boundary.</p>

Reference Number	Comment	Llangarron Parish Council Response
11	<p>Dear Sir or Madam, I would like to strongly object to the NDP that has been submitted by the Parish council and to get my reasoning I have bullet pointed the concerns below, my relationship to Llangarron REDACTED and are extremely disappointed with how the NDP has been submitted and REDACTED, I have attended all Zoom meetings that were available for the public in this process with my family.</p> <ul style="list-style-type: none"> • Complete lack of Public consensus of the NDP carried out, one mention in a meeting on how NDP can be communicated and what method but nothing actioned. • NDP cuts out the central areas and historic dwellings ie The old Pub, Bakery, The forge and original Council house dwellings etc • NDP plan has strategically strangled the opportunity to allow the growth by keeping a tight area to do so, however have sanctioned over development of neighbouring Llangrove instead? • Public opportunity to have there voice at meetings was very brief REDACTED • Parish Council members have had out of public hearing meetings on NDP REDACTED • Successful current and historic planning consents and applications REDACTED. • REDACTED In Summary the Parish Council have rail roaded the NDP into this submission with an intention to block out development and opportunity for younger generations and affordable accommodation, complete lack of consultation with the parishioner's and quite frankly an extremely poor process and REDACTED. I really hope the NDP is challenged and an opportunity to fully review the merits of the submitted NDP in full. 	<p>Refer to the Consultation Statement.</p> <p>The responses to the consultations have included both letters of support and objections. The Parish Council has considered all responses at all times and has taken a balanced view to approve a robust NDP which addresses local issues and concerns effectively. The settlement boundaries have been informed by public consultation and are supported by the majority of residents in responses - see responses to the Regulation 14 and Regulation 16 consultation. Housing policies support development which meets the needs of different groups including young people. The areas mentioned are not 'central' to the built part of settlements. See refusal of planning decisions mentioned in paragraph 3.1 Part 9.</p> <p>The NDP does not 'sanction growth' for one settlement over another. Boundaries were drawn up for all settlements. They are supported by most respondents, see above.</p> <p>There have been several opportunities for residents and stakeholders to take part in consultations on the NDP and the high volume of responses at the Regulation 14 and Regulation 16 stages indicate a significant level of local engagement in the process. See Consultation Statement and paragraph 3.1 Part 1. COVID restrictions meant that face to face meetings could not be held in recent months. However the PC has considered all written responses very carefully. Speaking time at Parish Council meetings is limited to ensure meetings remain manageable.</p>

Reference Number	Comment	Llangarron Parish Council Response
12	<p>REDACTED and am dismayed how the present parish council have delivered the present draft ndp There have been no open meetings where everyone can have a say as I have seen advertised and I didn't know about this present reg 16 time until someone told me. REDACTED I not been able to go to evening PC meetings so at last I am now able to speak out. There should have been meetings that everyone could attend and not REDACTED at evening meetings. Its actually very difficult to find when meetings are held without searching to find them and it appears REDACTED and decisions made at PC meetings. The PC is made up of REDACTED REDACTED and called it a training meeting REDACTED. REDACTED and haven't even considered housing for young people to be able to live in the village and enjoy what I do. Rental properties would also be good for the young but I have not seen these mentioned. The result is that there are hardly any young people in Llangarron village REDACTED in the Garron Centre which needs using as it was built with lottery funding but hardly gets used. We need more people in the village from all walks of life and how can this ever happen over the next 10 years with the PC having drawn a very tight boundary round it to stop any development in the village which is far far larger that they are saying. There are two sets of council houses in the village and it's one or two minutes walk at the most to the centre of the village and the church How can these be excluded from the boundary and even the long standing village hall has not been included. I have also seen on the plan that the village floods badly and is shut off? REDACTED and I have never been unable to leave or get back to the village, it's just not true and I believe was added as another reason to stop development in the village. The village does flood at the Garron Bridge</p>	<p>Refer to the Consultation Statement and paragraph 3.1 Part 1.</p> <p>Refer to paragraph 3.1 Part 2 - the responsibility for Regulation 16 consultation lies with Herefordshire Council.</p> <p>There have been several opportunities for residents and stakeholders to take part in consultations on the NDP and the high volume of responses at the Reg 14 and Reg 16 stages indicate a significant level of local engagement in the process.</p> <p>See paragraph 3.1 Part 11. Refer to Policy SUS1: Sustainable Development 4. New residential development should be located within the identified settlement boundaries of Llangrove, Llancloudy, Llangarron and Three Ashes and should contribute to a suitable mix of housing in terms of type, size and tenure to promote strong, balanced communities, and in particular meet the needs of young families, the elderly and people with disabilities. The precise housing mix should address the changing needs of the parish over the plan-period in order to support local community and economic wellbeing. Also Policy HOU1: New housing development supports a mix of house types and tenure, with an emphasis upon smaller starter homes and affordable family accommodation.</p> <p>COVID restrictions meant that face to face meetings could not be held in recent months. However the PC has considered all written responses very carefully. Speaking time at Parish Council meetings is limited to ensure meetings remain manageable. The areas mentioned are not 'central' to the built part of settlements. See refusal of planning decisions mentioned in paragraph 3.1 Part 9.</p>

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	<p>after heavy storms but it goes up quickly and also goes down very quickly. But there are other roads out through Llangrove and through to St Weonards and it's normally only for around 12 hours anyway. So that is an untrue statement and should be removed.</p> <p>1 I would like the Inspector to have my views as a young person living in the village of whom there are sadly very few and I would like to see more.</p>	<p>Flooding and the closure of roads in Llangarron occur frequently and are a matter of public record with Herefordshire Council, Balfour Beattie and the Environment Agency.</p> <p>Refer to the Consultation Statement for information about informal consultation on the settlement boundaries. The majority of respondents supported the boundaries in their responses to the Regulation 14 and Regulation 16 consultations.</p>
13	<p>I am writing to you today with concerns over the proposed construction of a huge number of houses in Llangarron. I have been informed that planning permission has been granted for the construction of 101 houses, which puts Llangarron 50% over the target set by Hereford council for house building by 2031. REDACTED. I am extremely concerned about the increased traffic moving at speed REDACTED and how much of a danger this will pose not only to myself but other road users. There has already been a steady rise of traffic passing at speed since the road was resurfaced and it stands to reason that if these houses are built, we can expect upwards of two cars per household travelling this main route in and out of the village daily, as there are no basic local amenities in Llangarron. The roads are also not suitable for a huge influx of residents, and could become very dangerous with an increase in vehicles using them, along with the large farm vehicles. Several times over the last few years, the village has been completely isolated due to flooding. The situation is getting worse each year and concerns must surely be raised about access for emergency services. I hate to see a village that I have loved REDACTED become completely spoilt by a rash of modern</p>	<p>The NDP cannot influence planning decisions that have already been made. The NDP takes account of the fact that the Parish is well over the minimum housing target.</p> <p>Refer to NDP Policy TRA1 Promoting Sustainable Transport in New Developments.</p>

Reference Number	Comment	Llangarron Parish Council Response
	housing. I hope that you will consider points raised, and do the right thing by the residents of the village	
14	<p>I don't feel like there has been enough public consultation regarding the Llangarron Neighbourhood Development Plan within the parish so as to include everyone within the community especially over the last couple of years, I feel it has been very closed doors and very restrictive so certain groups of parishioners have struggled to take part. I did notice when reading the First Regulation 14 Consultation - 6 Feb 2017 - 20 March 2017 Table 3 Residents Comment there was various suggestions for growth including planning within the villages that make up the Llangarron Neighbourhood Development plan but can see most of this was ignored by the committee especially when it comes to Llangarron as it seems it has been protected from further development at the expense of other settlements in the Parish. I don't think it is right to stop all development which is what they seem to suggest within this plan but have help and guidance for the future sustainability and growth. The settlement boundary, particularly around Llangarron has been drawn so tightly, so as to restrict any future development over the coming years - not very forward thinking. Also parts of the village including the areas north (Herberts Hill) and south (Garron View) of Llangarron village were deliberately avoided, strangely enough Llangarron Village Hall was also excluded from the village boundary. Many in the Parish would appreciate a chance to review this process so that all possible options are aired and discussed in open forum. I feel that Llangarron is just starting to grow as a village – we have a good road into the village and can see there is definite opportunity for development on a smaller scale including affordable homes to keep the</p>	<p>Refer to the Consultation Statement and paragraph 3.1 above Part 1.</p> <p>There have been several opportunities for residents and stakeholders to take part in consultations on the NDP and the high volume of responses at the Reg 14 and Reg 16 stages indicate a significant level of local engagement in the process.</p> <p>The NDP does not consider the needs of one settlement over another. Boundaries were drawn up for all settlements. They are supported by most respondents, see above</p> <p>COVID restrictions meant that face to face meetings could not be held in recent months. However the PC has considered all written responses very carefully. Speaking time at Parish Council meetings is limited to ensure meetings remain manageable.</p> <p>Refer to paragraph 3.1 Part 9.</p> <p>Refer to the Consultation Statement for information about informal consultation on the settlement boundaries. The majority of residents supported the boundaries in their responses to the Reg 14 and Reg 16 consultations.</p> <p>Refer to Policy SUS1: Sustainable Development</p> <p>4. New residential development should be located within the identified settlement boundaries of Llangrove, Llancloudy, Llangarron and Three Ashes and should contribute to a suitable mix of housing in terms of type, size and tenure to promote strong, balanced communities, and in particular meet the needs of young families, the elderly and people with disabilities. The precise housing mix should address the changing</p>

Reference Number	Comment	Llangarron Parish Council Response
	<p>younger generations within the village community they have grown up in and know and have supported.</p> <p>There does not seem to be any consideration given to the development of businesses both current and future within this plan which is very poor due to the local businesses we have within the locality.</p> <p>Overall I do not feel a full democratic process has been observed and that the NDP is fit not for purpose as it does not take anything into account for the coming years which as I understand it should do</p>	<p>needs of the parish over the plan-period in order to support local community and economic wellbeing.</p> <p>Also Policy HOU1: New housing development supports a mix of house types and tenure, with an emphasis upon smaller starter homes and affordable family accommodation.</p> <p>Refer to Section 8 and Policy EMP2: Tourism and rural diversification. The plan encourages homeworking.</p> <p>Following the examination process, the NDP should proceed to a local Referendum and everyone on the electoral role will be invited to vote on whether the NDP should be used to determine planning applications.</p>
15	<p>I wish to strongly object to the proposed Llangarron NDP. REDACTED that we have only found out about under freedom of information requests emails past between REDACTED councillors with REDACTED wording to make the NDP REDACTED, alongside the lack of communication and presentation to the parish. At both PC meetings and NDP meetings members of the public are given opportunity to speak REDACTED and all requests/suggestions are disregarded and/ or unanswered. The whole process has been the most un-democratic. REDACTED. REDACTED not one member of the Parish Council / NDP committee has asked me my opinion on what they are proposing.</p>	<p>Refer to the Consultation Statement and paragraph 3.1 Part 1 above.</p> <p>There have been several opportunities for residents and stakeholders to take part in consultations on the NDP and the high volume of responses at the Regulation 14 and Regulation 16 stages indicate a significant level of local engagement in the process.</p> <p>COVID restrictions meant that face to face meetings could not be held in recent months. However the PC has considered all written responses very carefully. Speaking time at Parish Council meetings is limited to ensure meetings remain manageable.</p>

Reference Number	Comment	Llangarron Parish Council Response
	<p>What they indeed are proposing is increased development on a dangerous and fast main road although it is a B road this road at Three Ashes REDACTED. Yet this hamlet is due to double in size with present and future planning yet no request for a 30mph speed limit has been made. Llangrove is vastly over developed and feels claustrophobic to drive through and the roads to and from Llangrove are both single track with very few passing places. Llancloudy has also seen vast numbers of new planning applications yet this hamlet suffers from flooding issues which seem to be ignored when planning is submitted and subsequently passed. Llangarron is treated as a pensioner pocket</p> <p>REDACTED they have done nothing about the car park and recreation area that was submitted in the first Draft NDP as the ground is no longer available,</p> <p>REDACTED Llangarron desperately needs new family homes for local family's / workers not the large executive type that we have seen in recent applications REDACTED</p> <p>Public notices for the NDP appear to be displayed everywhere except Llangarron village itself.</p> <p>Please see attached a map clearly showing the main built up areas of Llangarron yet half of this area is no longer part of the village? The old pub, bakery and the forge are no longer within the village boundary yet they were once integral parts of a once thriving village. The Forge is still run</p>	<p>The NDP cannot address planning permissions already granted. The NDP notes the problems with traffic in Section 10. The NDP promotes more sustainable transport alternatives - see Policy TRA1: Promoting Sustainable Transport in New Developments and Policy SUS1: Sustainable Development and various other policies. Drainage and sewage are addressed in Policy HOU1: New housing development and Policy ENV3: Flooding.</p> <p>Refer to Policy CSU1: Protecting Existing Community Facilities and Supporting Investment in New and Improved Facilities - this supports provision of a new car park to support the Garron Centre in Llangarron and a new play area if land becomes available.</p> <p>Policy HOU1: New housing development supports a mix of house types and tenure, with an emphasis upon smaller starter homes and affordable family accommodation.</p> <p>Refer to the Consultation Statement. Notices were put up on all parish notice boards.</p> <p>Refer to the Consultation Statement for information about informal consultation on the settlement boundaries. The majority of residents supported the boundaries in their responses to the Regulation 14 and Regulation 16 consultations.</p>

Reference Number	Comment	Llangarron Parish Council Response
	<p>as a successful agricultural engineering business employing local people where possible and having a local customer base yet has no mention in the NDP? I cannot recommend this current NDP proposal as a fair and adequate plan for the future of Llangarron as a whole. Nobody has mentioned the superfast broadband within the village that with the current covid issues enables people to work successfully from home.</p>	<p>The areas mentioned are not 'central' to the built part of settlements. See refusal of planning decisions mentioned in paragraph 3.1 Part 9.</p>
16	<p>The creeping suburbanisation of rural villages is driven by both the character and the quantum of housing development approved. Llangrove is a prime example of this. Suburbanisation often arises from standardised detached house types, layouts, vehicular access design and sporadic mixed tree planting in large amenity grass verges. Applications viewed within Llangarron Parish appear to be assessed with the minimum of supporting information, often without the benefit of data on finished floor levels, overall ridge heights, contextual crosssectional information running beyond the red line boundary, Landscape and Visual assessment work and Heritage and Conservation Assessment. Road design is approved using highway standards which are applicable for large developments but not appropriate for rural settings, resulting in concrete upstand kerbs, radii out of scale with context and short sections of unconnected footpaths which spill back out into hedgerow. Many of the recent schemes within Llangrove could have offered opportunities to claw back its village character, such as the promotion of gable end positions, visual linkages with heritage dwellings and by creating narrowing to promote traffic calming, particularly effective in conjunction with the Parish Council's efforts to introduce a 20mph zone. Stone fronted houses could reflect local stone tones rather than introducing standardised buffs 1 and</p>	<p>The NDP includes policies which promote high quality design that refers to local character. Refer to Policy ENV1: Landscape and biodiversity and Policy ENV2 Protecting historic assets and settlement character.</p> <p>The NDP cannot be used to influence development that already has planning consent.</p> <p>New elements cannot be introduced to policies at this late stage.</p>

Reference Number	Comment	Llangarron Parish Council Response
	<p>greys. Although concerns were raised by the Authority's Conservation Officer in recent applications, they appeared to be disregarded and there is often no formal response from a Landscape Officer. The proposed Llangarron Neighbourhood Plan begins to address some of these concerns, but still contains generic policy speak. Could more prescriptive text be inserted which would help to support planning officers in their consultations?</p> <ul style="list-style-type: none"> • Proposals should not lead to the suburbanisation of rural villages. The introduction of standard highway infrastructure such as upstand kerbs, radii entrances, obvious visibility splays and short sections of unconnected pavements should be avoided. Safe and appropriate vehicular access and general layout, cut and fill should be agreed in outline before details progress. • Proposals should have regard for the existing character of the surrounding area at night. The introduction of street lighting should be avoided. • All development should address the site's context in terms of built form and topography. Proposals should demonstrate how new development relates to the surrounding context in the form of full crosssectional elevations which extend beyond the site boundary and illustrate cut and fill proposals, particularly on sloping and rolling sites. Allowing the LPA to fully understand the impact of individual development proposals on their setting, especially in rolling countryside. • Traffic calming schemes must not introduce suburbanising elements associated with standard highway infrastructure. Refer 'Traffic in Rural Villages: A toolkit for communities'. • Landscape and Visual Assessment work will be required for all housing proposals consisting of more than one dwelling. 	

Reference Number	Comment	Llangarron Parish Council Response
	<ul style="list-style-type: none"> • The setting of locally designated nature reserves should be considered. 	
17	<p>Over the past 2 years I feel as if I have been afforded the right to comment on the NDP in an appropriate manner. In fact, when I have tried to comment my requests REDACTED. As such, I have stopped engaging as I REDACTED have felt it's a complete waste of time. This total lack of care and attention to co create an NDP by the parish council has left my family in no doubt that we should raise concerns over the way it has been handled. Closed door meetings REDACTED "training events" have been undertaken by the parish councillors and the final plan has not been shared or signed off at a formal parish council meeting. REDACTED. REDACTED those that yearn for a parish fit for the future REDACTED and would strongly suggest that the NDP process has been poorly handled, poorly communicated, disadvantages those who wish to see progress, REDACTED. As such, we strongly object to the NDP.</p>	<p>Refer to the Consultation Statement and paragraph 3.1 Part 1.</p> <p>There have been several opportunities for residents and stakeholders to take part in consultations on the NDP and the high volume of responses at the Reg 14 and Reg 16 stages indicate a significant level of local engagement in the process.</p> <p>The plan was approved through the correct process, see paragraph 3.1 Part 3 above. COVID restrictions meant that face to face meetings could not be held in recent months. However the PC has considered all written responses very carefully. Speaking time at Parish Council meetings is limited to ensure meetings remain manageable.</p>
18	<p>I understand that the consultation period for Llangarron NDP has commenced and I therefore take this opportunity to re-send some comments originally set out in an email of 1st February. I wish to align myself REDACTED who are less than happy with the management of the procedure whereby the NDP has been drawn up, in particular with the determination to prevent developments that might prevent the village of Llangarron declining to become a mere enclave REDACTED. I REDACTED are especially concerned by the proposal to make the Llangarron development boundary so small as to exclude areas that have historically been an integral part of the village for the last 80 years or so, as well as its seeming aim to prevent even modest developments within the outlying hamlets,</p>	<p>Refer to the Consultation Statement and the Parish Council's responses to Regulation 14 comments.</p> <p>Refer to the Consultation Statement for information about informal consultation on the settlement boundaries. The majority of residents supported the boundaries in their responses to the Regulation 14 and Regulation 16 consultations.</p> <p>There has been significant housing growth in recent years and the minimum housing target has been exceeded. Hopefully the increase in number of local residents will help to support the remaining local community facilities.</p>

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	<p>settlements which have historically been a significant feature of the rural community. The following are my comments made in response to the draft document. They were rejected by the PC but I re-state them here to provide an alternative view to that put forward by the PC This is a disappointing document, not so much a Development Plan as a plan to ensure stasis and to discourage change. By drawing the development boundaries so tightly around four settlements, opportunities for positive development for housing or for commercial enterprises are effectively stifled. Llangarron and its environs has long been in decline, as is vividly illustrated by comparing the description of the village given in par. 3.10: "by the late eighteen-hundreds, Kelly's directories of the time list carters, farriers, plasterers, carpenters, bootmakers, coffin makers and millers. There were several working mills on the Garron, two pubs, at least two shops, a school and of course the ancient church" Only the church remains. The self-sufficiency of the late eighteen hundreds cannot easily be regained, but to restore some degree of vigour and vitality it is essential that positive measures are taken to provide opportunities for young people to move into the area: affordable housing must be an absolute priority. More small dwellings would also allow older people to move within the locality, thereby making their large and frequently under-occupied family- sized homes available for new families. The insistence on imposing a tourniquet around the four main settlements cuts off the life blood of youth: as a result the village is in danger of becoming an enclave REDACTED.</p> <p>1</p>	<p>The NDP does not prevent modest development in outlying hamlets provided the policy criteria of the Core Strategy and the NDP are followed.</p>

Reference Number	Comment	Llangarron Parish Council Response
	<p>The plan's repeated insistence on restricting development to within the tightly-drawn settlement boundaries also flies in the face of the traditional pattern of settlement in Herefordshire which, as stated in chapter 3, comprises small villages surrounded by scattered hamlets and small settlements. Biddlestone, Langstone, Penguithal, Tredunnoch, Tre Essy, Tre Evan, Trehumfrey, Tre Reece and Treribble are mentioned, but there are numerous other sites comprising groups of up to half a dozen or so dwellings. Limited development to provide well- designed small houses in and around these sites would be entirely in accord with the local settlement patterns. It could also provide opportunities for new generations the benefits of being raised within a truly rural environment. And with appropriate safeguards it could be achieved with no risk of 'concreting over the countryside. I await the conclusions of the independent examiner with considerable interest.</p>	<p>Settlement boundaries have been identified for those settlements identified in the Core Strategy as being suitable for development. Outside these areas the remaining Parish is the countryside and other rural area policies apply.</p>
19	<p>Dear Independent Regulator, I would like to make two objections about the Neighbourhood Plan 2020-2031.</p> <p>Section 8 Employment It is more than surprising that the Plan supports the development of new agri-businesses such as polytunnels, given the community's well-known arguments against in recent years. The most recent application for polytunnels in Biddlestone was rejected by Herefordshire planners.</p> <p>Section 9 Housing More recent housing developments have been priced within the Executive category. Additionally, there has been an historic failure to include developments of smaller housing units to meet the needs off the wider community. Without a much clearer statement of</p>	<p>Policy EMP1: New agricultural buildings and poly tunnels aims to provide suitable guidance to ensure new polytunnels are stied and designed sensitively.</p> <p>The NDP cannot be used to influence schemes which already have planning permission.</p> <p>Policy HOU1: New housing development supports a mix of house types and tenure, with an emphasis upon smaller starter homes and affordable family accommodation.</p>

Reference Number	Comment	Llangarron Parish Council Response
	intent the plan does not meet the objective of 'delivering housing to meet the needs of all sectors of the community	
20	<p>I have been dismayed at the amount of building in Llangrove in recent years. We are told the infrastructure and it is a sustainable village, but it isn't. The school is REDACTED. The road into and out of Llangrove is single track, two small cars can pass at certain places, pulling in areas have been carved out of hedges and use of driveways in the village are used. We have had to have our drive relaid due to the heavy lorries using it. No pavements make walking in the village very dangerous especially at the school and work run times. I had have been forced back into the hedge by a driver and was just missed. The state of the road is just one long pothole and uneven repairs. Surprisingly Llangarron has a perfect road! Building has centered on Llangrove, the plans always seem to show a tight ring around Llangarron, they need housing too. Non of the housing has been affordable. Llangrove cannot survive more housing without upgrading the road, water supply, my pressure has gone down in the years lived here, when we moved we were told the sewage system couldn't cope, miraculously it now can. Although we have doubts due to the call outs to one part of the village. The neighbourhood plan should tighten around Llangrove and extend around neighbouring villages.</p>	<p>The NDP cannot be used to influence schemes which already have planning permission.</p> <p>The NDP notes the problems with traffic in Section 10. The NDP promotes more sustainable transport alternatives - see Policy TRA1: Promoting Sustainable Transport in New Developments and Policy SUS1: Sustainable Development and various other policies. Drainage and sewage are addressed in Policy HOU1: New housing development and Policy ENV3: Flooding.</p> <p>The NDP does not consider the needs of one settlement over another. Boundaries were drawn up for all settlements. They have been supported by the majority of residents at Regulation 14 and Regulation 16 consultations.</p>
21	<p>REDACTED and have seen the village change dramatically over that time. Up until a point 3 years ago, when planning was passed for an area adjacent to the village pub, I have tolerated the planning decisions made. However, the lack of public consultation for the current wave of planning has forced me to speak. I am fully aware that more homes are needed, and that we all need to absorb the need for housing</p>	<p>The NDP cannot be used to influence schemes which already have planning permission.</p>

Reference Number	Comment	Llangarron Parish Council Response
	<p>in our area, but again if we have exceeded this obligation, why are we still building?</p> <p>My issue though is more the type of housing that seems to obtain planning - large 4/5 bedroom houses, that can only be described as eyesores, not in any way in keeping with the existing housing, which have devoured every piece of green space between dwellings, ultimately destroying the charm of the village which first drew us to living in this area. If housing has to increase, shouldn't it bring something to the area? Housing for local employment, facilities? God forbid that you are local to this area, employed locally and wishing to remain here - planning does not seem to cater for lower earners, locals wanting to get on the housing ladder or even finding housing to rent. Although there is much use of the words 'creating a balanced community' under policy statements, there seems to be little evidence of this in planning applications that have been passed. The planning doesn't seem to cater for this at all and it is a travesty and an injustice. This is our village, but we have little say in how we would like our village developed.</p> <p>That said, I request that the development plan is therefore reconsidered, in order to allow time for advertised, open, public consultation meetings in order to properly discuss and allow residents the opportunity to hear the facts, understand the implications, alternative options if there are any, which allows a proper say for residents as to what happens in their area. Decisions and processes need to be transparent and honest so this does not become a farce in what should be an open, democratic process. We are the people who live here and it should be our views that are taken into consideration as to how our village changes to</p>	<p>Policy HOU1: New housing development supports a mix of house types and tenure, with an emphasis upon smaller starter homes and affordable family accommodation.</p> <p>The NDP includes policies which promote high quality design that refers to local character. Refer to Policy ENV1: Landscape and biodiversity and Policy ENV2 Protecting historic assets and settlement character.</p> <p>Refer to the Consultation Statement and paragraph 3.1 Part 1 above. There have been several opportunities for residents and stakeholders to take part in consultations on the NDP and the high volume of responses at the Regulation 14 and Regulation 16 stages indicate a significant level of local engagement in the process.</p> <p>Following the examination process, the NDP should proceed to a local Referendum and everyone on the electoral role will be invited to vote on whether the NDP should be used to determine planning applications.</p>

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	<p>accommodate and adapt for the needs of the next generation. As it stands, I don't feel this is being done. It is time to put the needs of our village and its future first.</p>	
22	<p>As a long term resident of the area I would like to provide some factual information on how the Llangarron Parish NDP has been managed since December 2012 It was stated on the Reg 14, 1st draft published in March 2017 Quote: "It is therefore considered that development sites within Llangarron village centre itself are limited to two small pockets with potential for limited development" This is an untrue statement as there were many small sites available in Llangarron Village suitable for development! There are still others now, but because a very restrictive boundary was drawn at that time they cannot get planning for small development as residents are being told they are no longer in the village of Llangarron! REDACTED In 2012</p> <p>NAME REDACTED BY PC was employed by the PC to 'lead' the former steering group for the NDP. She went around the Parish and allocated sites herself. REDACTED. REDACTED To find sites for housing but someone independent away from the Parish REDACTED. Following a very stormy public meeting in Llangrove in 2017 the draft NDP was stalled and NAME REDACTED BY PC then stepped down.</p> <p>The public were annoyed that a large percentage of proposed development appeared to be sited for Llangrove village (which had already far too many houses for the road network) with very little development proposed for Llangarron village. REDACTED. There was also considerable concern expressed that the steering group meetings were not open to the public and with very limited</p>	<p>The first Regulation 14 draft of the NDP was superseded by the second Regulation 14 Draft Plan and then the submission version of the Plan.</p> <p>These comments are therefore not relevant to the plan. See paragraph 3.1 Part 5.</p> <p>Refer to the Consultation Statement.</p> <p>There have been several opportunities for residents and stakeholders to take part in consultations on the NDP and the high volume of responses at the Regulation 14 and Regulation 16 stages indicate a significant level of local engagement in the process.</p>

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	<p>minutes taken and which were also not available to the public until 2017. They were put online for a very short time REDACTED Fortunately we managed to see these minutes in 2017 when the steering group were told to put them online from December 2012 and we copied them before they were REDACTED lost! So we have these minutes from 2012- 2017 if needed. After this meeting in Llangrove and with pressure from us and other landowners and Parish Councillors the steering group was disbanded and the Parish Council then listened to us and others and took over the NDP themselves and fortunately some new Parish Councillors came forth and the process began again with the new Parish Councillors advising that there should be an independent review of the four boundaries as they were inconsistent as highlighted by Herefordshire Council at the time. This was very favourable with local residents with some land as it was fair to all. There followed a fresh call for sites and we put forward two sites in the centre of the Village 7a and 7b to Aecom In fact one was a site that we had been told by the steering group wasn't suitable and not to put it forward ! In fact the AECOM report suggested it was particularly well suited. To this day we still haven't been told why we could not submit it. The steering group ignoring all our emails. REDACTED. These are the original group who decided on the very tight boundary for Llangarron village which the inspector has now. They could not find a real boundary they said, so they basically decided on one themselves, ruling out much of the village, we we and others know historically is totally incorrect. The then P.C. who disbanded the steering group agreed all NDP meetings from then on were to be completely transparent with the public being permitted to attend and be involved in and</p>	<p>Refer to the Consultation Statement for information about informal consultation on the settlement boundaries. Many residents supported the boundaries in their responses to the Reg 14 and Reg 16 consultations.</p> <p>The Parish Council made a decision not to include site allocations in the NDP. This is set out in Section 9 of the NDP: 9.29 Herefordshire has 3.69 years of housing land supply (see Five Year Housing Land Supply (2020 - 2025) Annual Position Statement at 1 April 2020, September 2020) and Herefordshire Council therefore has a shortfall in future housing provision which is likely to lead to further pressure from developers. However, development in Llangarron Parish, as evidenced by the recent high level of commitments, and the constraints of the Parish has reached the stage where further applications for new housing development will place a significant strain on local infrastructure including, the highway network, surface water and drainage in a Parish which is already subject to regular flooding. For these reasons, the Llangarron Neighbourhood Development Plan has not sought to allocate additional new development sites.</p>

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	<p>speaking up, also speaking time for the public should be extended. See Community Letter May 2018.</p> <p>UNFORTUNATELY after this in May 2019 the Parish Council changed when elections were held. This resulted in a big change with a great proportion of new residents to the village of Llangarron putting themselves forward purposefully. REDACTED. Now with these new councillors it then meant that Llangarron PC was made up of mostly new people living in and around the village of Llangarron REDACTED. We had lost the very open and transparent PC we had before. Llangrove, Llancloudy and Three Ashes were and are hardly represented at all on the PC and decisions are being voted on and agreed by Llangarron village Councillors who have the huge balance of power on the PC. Much changed after this now having a PC dominated by new Llangarron village REDACTED.</p> <p>After this we and other small landowners had no voice at all. There was never a proper consultation with our questions we emailed never taken into account. It basically was a closed shop with about 7 on the PC making all the decisions and voting them through. We were never consulted or allowed much time to speak and decisions were being voted on in-front of us and we were not allowed to have any input. It was so frustrating to not be included and we speak for many others who are long standing residents of the village who have and are seeking planning permission for just small, sensitively sited developments of 2-4 houses only Surely this is how the village of Llangarron should be, allowed to grow in small stages In 2019, we were all waiting</p>	<p>9.30 In summary Llangarron Parish has already met its minimum housing target and there is no need for further site allocations in the NDP. In addition, there has been a clear message from Parishioners that further site allocations in the NDP would not be supported.</p> <p>This is untrue. See paragraph 3.1 Part 12. Parish Councillors live in all areas of the Parish and have been elected through a democratic process and represent the whole of the Parish. The Parish Council is the legal body responsible for the preparation of the NDP.</p> <p>This is untrue, all Councillors voted in public votes. There was no decision making by 'about 7' councillors. Refer to Consultation Statement and paragraph 3.1 Part 1 above.</p> <p>Landowners have had opportunities to comment on the NDP along with all other stakeholders. The responses to the Reg 14 and Reg 16 consultation processes have demonstrated that many residents support the approach in the NDP and would resist site allocations when the Parish has already seen so much development in recent years.</p> <p>Refer to the Consultation Statement 3.0 Call for Sites and Technical Site Assessment for further information about the technical report and how it was publicised and comments invited.</p>

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	<p>for the much wanted 'independent' Aecom report and Kirkwells report commissioned by the former P.C. to come through. In the meantime whilst waiting there was an unminuted P.C. meeting held on 15th July 2019 in Llangrove that was REDACTED 'training meeting 'and is not on the inspectors list of meetings, we have the Freedom of Information that this meeting was not a-training meeting at all but that REDACTED that they wanted to go through the Kirkwells and Aecom report with Louise Kirkup that they had received in early June as there were discrepancies noted by her. We had no idea that this report had been received by the PC and they were going through it altering text. To this date although we have 'repeatedly 'asked we have not been told what the discrepancies the PC said there were and what was changed at that meeting with Kirkwells, especially the work on the boundaries, before the public had sight of anything at all. We are still waiting. At the next meeting on 8/8/2019 the landowners were furious to find that the P.C. had not disclosed they had received the report and there had been an unminuted meeting also. REDACTED. We were told that the PC had only received the report at the end of June when in fact again shown on FOI we have that the PC had received it on the 3rd of June. The PC would not tell the public what they had changed with Kirkwells at that meeting on the 15th July . They just said that there were discrepancies! The public stated that they were not going to wait until September to see it and wanted it straightaway. REDACTED. Since then the PC have restricted public participation to the very start of meetings to 10 minutes with only 2 minutes each. A stop watch has been used at times. When discussion happens later on in the meetings we are not permitted to speak. In fact on some occasions muted. We have now obtained the small development we wished</p>	<p>Refer to paragraph 3.1 Part 6.</p>

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	<p>for in the centre of the village of Llangarron from Herefordshire Planning and are not applying for anymore but wish to stand up for the other long standing small landowners in the village who are requesting for small development. However they are being told they are not in the boundary of Llangarron village which is not only incorrect but hurtful stating that they don't live in the village that they were mostly born in or lived in and supported for over 50 years! Please note the boundary drawn on the second plan for Llangarron village is as tight as the first boundary submitted in 2017 and it was critiqued then by Herefordshire Council. Yet it has been submitted again and the village hall excluded. It does not reflect at all on the true boundary of the village as we remember it. it excludes the old pub the old forge, old vicarage, village hall and 2 sets of ex local authority council houses at each end of the village. Why should a small group of new residents REDACTED decide on where the boundary of Llangarron village is without any public consultation? If the inspector seeks to accept the boundary for Llangarron Village up until 2031, it is not a true one but was drawn tightly and incorrectly by a few residents on the steering group REDACTED. They also had not been in the village long to know the true boundary as long term residents do. I am happy to submit the old minutes from the steering group now disbanded REDACTED. The boundary should include the village of Llangarron as long standing residents remember it and not one that has been draw by a few people new to the village REDACTED as shown by not even including the village hall and the two sets of ex council houses. Looking at Llangrove village the boundary there includes the two sets of ex council houses built around the same time as the Llangarron ones were and the difference is that Llangrove</p>	<p>Residents are given a limited time to speak at Parish Council meetings to keep the meetings manageable. Written comments have been invited and carefully considered at all stages - see the Consultation Statement and paragraph 3.1 Part 1.</p> <p>Refer to Policy HOU1: New housing development - this supports a mix of house types and tenure, with an emphasis upon smaller starter homes and affordable family accommodation.</p> <p>Refer to the Consultation Statement for information about informal consultation on the settlement boundaries.</p> <p>The majority of respondents in the Regulation 14 and Regulation 16 consultation support the boundaries.</p> <p>Following the examination process, the NDP should proceed to a local Referendum and everyone on the electoral role will be invited to vote on whether the NDP should be used to determine planning applications.</p>

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	<p>was allowed to grow whereas Llangarron was not for the last 60 years and there is no community life as there is in Llangrove as all the services closed down, school, pub, shop , garage etc etc. Many people wish Llangarron village to grow and not stagnate but we and others have not been given a chance to speak openly as no proper consultation process with answers given REDACTED</p>	
23	<p>We have read the proposed NDP Regulation 16 document. There appear to be numerous anomalies and REDACTED in the detail, such as the line of the settlement boundary at Llangarron. We are also disappointed with the lack of provision for first time homes and smaller homes for the elderly and an REDACTED of the road capacity issues to Llangrove in particular</p>	<p>Refer to the Consultation Statement for information about informal consultation on the settlement boundaries. Many residents supported the boundaries in their responses to the Regulation 14 and Regulation 16 consultations.</p> <p>Refer to NDP Policy SUS1: 4. New residential development should be located within the identified settlement boundaries of Llangrove, Llancloudy, Llangarron and Three Ashes and should contribute to a suitable mix of housing in terms of type, size and tenure to promote strong, balanced communities, and in particular meet the needs of young families, the elderly and people with disabilities. The precise housing mix should address the changing needs of the parish over the plan-period in order to support local community and economic wellbeing;</p>
24	<p>As a Parish Councillor many parishioners have raised issues with me about how the NDP process has been conducted over the last 2 years and the lack of opportunity for real consultation. Listed below are the many concerns shared over the content in the current NDP Regulation 16 document. People who wanted amendments considered at Regulation 14 were disappointed by the approach REDACTED changing the document or associated maps and boundaries. Publicity from the Parish Council of the new Regulation 16 document to members of the community has been minimal, REDACTED. Many believe their</p>	<p>Refer to the Consultation Statement for detailed information about the many stages of informal and formal consultation on the NDP. Also refer to paragraph 3.1 Part 1.</p> <p>The Reg 16 consultation was the responsibility of Herefordshire Council. See paragraph 3.1 Part 2 .</p>

Reference Number	Comment	Llangarron Parish Council Response
	<p>comments have already been ignored without any discussion or reasoning. It can also be observed that the final version of the document was not even presented and discussed at a formal parish council meeting for councillors to approve following the amendments considered during Regulation 14. My detailed comments are set out below. Would you please confirm receipt of this email. Kind regards Paul Lodge (Llangarron Parish Councillor) General The following bullet points consolidate areas where some in the community have already highlighted concerns:</p> <ul style="list-style-type: none"> • Public Consultation – there has been a lack of full public consultation and no research in the last few years into community needs. In the last 2 years as a new Regulation 14 document NDP was drawn up there have been no fully open house 1 and free public meetings with the different communities within the Parish to hear and discuss public opinion. The last time there was proper community consultation was back in 2014. All recent NDP meetings REDACTED as to avoid any fully open discussion. Only 15 minutes allocated at the start of a meeting for full community consultation is totally inadequate. It did not meet the requirement for questions and answers as only a few members of the public could speak and councillors were not allowed to reply. The discussions following the Regulation 14 responses from the Parish were also conducted in a very restricted manner REDACTED. The many requests for further discussion on boundary issues REDACTED. The timing of all PC meetings on the NDP were in the evenings and/or on Zoom which immediately disadvantaged and discriminated against many members of the community. No “Village Hall” style meetings over a Saturday or Sunday 	<p>This is not correct. Refer to the minutes on the Parish Council website. The Submission Plan was formally approved by the Parish Council on 21st Jan 2021 and the Basic Conditions and Consultation Statements were approved on 26th January 2021.</p> <p>A majority of respondents and stakeholders support the Plan and this is evidenced in the representations submitted during the Regulation 14 and Regulation 16 consultations.</p> <p>Refer to Consultation Statement and paragraph 3.1 . There were a number of open public meetings. As the Regulation 14 consultation completed its final stage during COVID restrictions the Parish Council followed Government guidance as set out in PPG. Refer to the Consultation Statement Parish Council Consideration of Responses Prior to Submission paragraphs 5.13 and 5.14:</p> <p>5.13 The Parish Council considered all the responses at an open online meeting on 1st December 2020. Public attendees were allowed a short time to provide further verbal comments to the Parish Council. The Parish Council then voted on the agreed changes to the NDP. It was agreed that the Submission NDP should retain the settlement boundaries identified in the Draft Plan and should not include one or more site allocations for housing. Other detailed amendments were largely approved.</p> <p>Members of the public are given a limited time to speak at Parish Council meetings to keep the meetings manageable. All those wishing to do so were able to contribute without domination of the meeting by one or two individuals.</p>

Reference Number	Comment	Llangarron Parish Council Response
	<p>were held as seems to be normal practice for construction of NDPs</p> <ul style="list-style-type: none"> • Llangarron NDP Consultation Statement paragraph 2.11. Despite my attempt to bring this to the attention of the PC, REDACTED at the PC meeting of 15 July 2019. This meeting was advertised as 'NDP Training by Kirkwells (our NDP consultants)', but in fact no training took place. The session was an almost 2 hour revision of the NDP document REDACTED. REDACTED. It is shown at Regulation 16 as a 'Presentation by Kirkwells' which is completely untrue. Through FOI requests, there is now email evidence to prove that this was not a training or presentation session REDACTED. • Producing a Neighbour Development Plan (NDP) should give local people the opportunity to decide the future of the place where they live and work. It is important to note that plans should focus on guiding development rather than stopping it. The emphasis with this NDP has a single focus to restrict development, which is wrong. • This NDP has mainly been constructed by a group of people REDACTED. It appears that Llangarron specifically has been protected from further development at the expense of other settlements in the Parish. • The NDP does not consider the identified future needs or specifically range of demographic needs within the Parish. The NDP that has been constructed reflects contentment with the status quo and there is no real aspiration to meet the needs of future generations, young and old. 2 • The community has regularly highlighted the need for smaller housing for the young and the elderly wishing to downsize in retirement. These groups of people are being forced to move away due to a lack of the right kind of housing to meet their needs. The NDP does not sufficiently 	<p>Refer to paragraph 3.1 Part 6.</p> <p>Following the examination process, the NDP should proceed to a local Referendum and everyone on the electoral role will be invited to vote on whether the NDP should be used to determine planning applications.</p> <p>This is untrue, the NDP contains policies for all the settlements, one would not benefit at the expense of others. Refer to paragraph 3.1 Part 12.</p> <p>The NDP does not have an emphasis on restricting development but supports suitable and sensitive development within the settlement</p>

Reference Number	Comment	Llangarron Parish Council Response
	<p>emphasise or make future provision for smaller or rental type properties and should do. This must be a stated housing requirement over the next 10 years of the NDP. It has been totally ignored REDACTED.</p> <ul style="list-style-type: none"> • Settlement boundaries, particularly around Llangarron have been drawn so tightly, so as to restrict any future development in the next 10 years. When these were considered over the last couple of years, it was only the options drawn up by the PC, that were eligible for consideration. This was done particularly to ensure the Llangarron Village boundary is highly restrictive; parts of the village including the areas with the council housing, the old pub site, commercial businesses and the old vicarage were deliberately avoided. Llangarron Village Hall was also excluded from the village boundary. Many in the Parish would appreciate a chance to review this process so that all possible options are aired and discussed in open forum. A detailed analysis of recommended change which need to be considered for each settlement boundary is at the bottom of these bullet points. • Paragraphs 3.1 to 3.18 paint the picture of an ideal rural community in Llangarron Village, but omits to mention the demise of what was historically the village at the heart of the Parish. This village has witnessed the closure of shops, pubs and the school. It is just beginning to grow again with some new housing and a fairly new community facility called the Garron Centre. Along with the best road network internally within the Parish (unlike Llangrove Village) Llangarron could absorb more housing, particularly if it involved smaller housing for the young and old alike. • Item 6.0/Sustainability 6.2 has the intent to offer future sites for planning, but this is not reflected in the plan, as there is no provision for allocated sites for commercial activity or future 	<p>boundaries. It has been drawn up through extensive public consultation and engagement with the majority of residents supporting the approach as set out in their responses to the Regulation 14 and Regulation 16 consultations.</p> <p>The Parish Council is the responsible body for the NDP. The vote on 1st December 2020 was 7 to 1 in favour of the published boundaries.</p> <p>Refer to NDP Policy SUS1:</p> <p>4. New residential development should be located within the identified settlement boundaries of Llangrove, Llancloudy, Llangarron and Three Ashes and should contribute to a suitable mix of housing in terms of type, size and tenure to promote strong, balanced communities, and in particular meet the needs of young families, the elderly and people with disabilities. The precise housing mix should address the changing needs of the parish over the plan-period in order to support local community and economic wellbeing;</p> <p>Refer to Policy HOU1:</p> <p>1. Development should support a mix of house types and tenure, with an emphasis upon smaller starter homes and affordable family accommodation.</p> <p>The Parish Council is the responsible body for the NDP. The vote on 1st December 2020 was 7 to 1 in favour of the published boundaries.</p>

Reference Number	Comment	Llangarron Parish Council Response
	<p>housing allocation, particularly for smaller or affordable homes.</p> <ul style="list-style-type: none"> • Specific Boundary issues: <ul style="list-style-type: none"> o General comments – there is no consistency with the marking of ‘Commitment Sites’ on the Settlement Policies Maps. Some are shown and others are not. It is logical, that not only should they be shown but as a general rule they should be included within the settlement boundary where appropriate. o Llangrove: 3 ♣ Bramber and Ivy Cottage – both these properties should be inside the village boundary as no evidence has been given for excluding them. ♣ Planned commitments • Kentrev – show on map (see P200020 dated 1 April 2020) • The Elms – show on map (see P191534 dated 27 March 2020) • Farm Lane – show on map (see P190395 dated 1 April 2020) o Llangarron: ♣ Herberts Hill site – show on map (see P191276 dated 11 December 2019). This is an existing planning commitment and should be shown as such and there is no logical reason why this plot should not be inside the village boundary, unless someone can give a logical and consistent reason for this. This site was part of the first NDP (2017) and shown inside the settlement boundary and was again supported in December 2019 by the PC during the planning process at the time. ♣ Llangarron Village Hall exclusion – this should be included within the village boundary. ♣ North and South parts of the village have been totally excluded from the boundary process when both are comparable settlements with Three Ashes in terms of their size. Both are also vital parts of Llangarron village and the local community. These should be further considered by the community and particularly the people who live there. o Llancloudy: ♣ See P172809 dated 1 November 2017. This is an existing planning commitment and should be shown as 	<p>Herefordshire Council will update Policies maps if required and the maps will be available and updated on the HC planning web pages.</p>

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	<p>such, but probably outside the village boundary. ♣ This area has planning permission for 1 property. See P193027 dated 2 December 2019. This is an existing planning commitment and should be shown as such and inside the village boundary. ♣ This area has planning permission for 4 properties. See P190423 dated 13 September 2019. This is an existing planning commitment and should be shown as such and it's status inside or outside the boundary should be judged by local people.</p>	
25	<p>Now that the Llangarron Neighbourhood Plan (NDP) is at Regulation Stage 16 we are writing to comment. In our view the Llangarron NDP would benefit from more listening to the community and by establishing more concrete plans for its execution. REDACTED. Key concerns include:</p> <ul style="list-style-type: none"> • Lack of meaningful consultation. • Covid should not be an excuse for failing to listen. • To all intents and purposes the final draft that you are presented with has not been seen by residents to comment on. (We only found out that the document had reached Stage 16 via the grapevine – surely in this age of transparency one can do better.) • Throughout the consultation process there have been no fully open public meetings since 2014. Surely town hall type meetings on a Saturday or Sunday when everyone could attend should have been held? • Development omissions <p>• This NDP seems to be focused on restricting development rather than guiding it. For example Llangarron seems to have been protected from development at the expense of other settlements.</p>	<p>Refer to the Consultation Statement and paragraph 3.1 Part 1 for details about the lengthy and extensive informal and formal consultation processes which have informed the preparation of the Plan. Including how the Parish Council has followed Government guidance in relation to consultation during COVID restrictions. Reg 16 provides another opportunity for residents and stakeholders to comment on the Plan and many have submitted responses.</p> <p>The Regulation 16 consultation was the responsibility of Herefordshire Council - see paragraph 3.1 Part 2.</p> <p>This is not the case. Meetings were held in the village halls in public. Following the introduction of covid restrictions, online Parish Council meetings were open to the public. Consultees have been invited to submit written representations throughout the process and all comments have been considered at all stages. Refer to the Consultation Statement and paragraph 3.1 Part 1.</p> <p>This is untrue, the NDP contains policies for all the settlements, one would not benefit at the expense of others;</p>

Reference Number	Comment	Llangarron Parish Council Response
	<ul style="list-style-type: none"> • The community has highlighted the need for smaller housing units for the young and the elderly wishing to down-size. The NDP does not emphasize and champion this need which is required over the next 10 years. Instead it seems to infer that the status quo is sufficient. • Settlement boundaries have been drawn so tightly so as to restrict future development. For example, excluding the Village Hall from the Llangarron village boundary seems inexplicable. • Sustainability. • 6.2 fails to allocate sites for commercial activity and for housing for smaller more affordable homes. 	<p>Refer to the Consultation Statement Parish Council Consideration of Responses Prior to Submission</p> <p>5.13 The Parish Council considered all the responses at an open online meeting on 1st December 2020. Public attendees were allowed a short time to provide further verbal comments to the Parish Council. The Parish Council then voted on the agreed changes to the NDP. It was agreed that the Submission NDP should retain the settlement boundaries identified in the Draft Plan and should not include one or more site allocations for housing. Other detailed amendments were largely approved.</p> <p>Refer to NDP Policy SUS1:</p> <p>4. New residential development should be located within the identified settlement boundaries of Llangrove, Llancloudy, Llangarron and Three Ashes and should contribute to a suitable mix of housing in terms of type, size and tenure to promote strong, balanced communities, and in particular meet the needs of young families, the elderly and people with disabilities. The precise housing mix should address the changing needs of the parish over the plan-period in order to support local community and economic wellbeing;</p> <p>Refer to Policy HOU1:</p> <p>1. Development should support a mix of house types and tenure, with an emphasis upon smaller starter homes and affordable family accommodation.</p> <p>Refer to Policy SUS1 and other NDP Policies which promote sustainable development.</p> <p>See above - NDP Policies SUS1 and HOU1. The decision not to allocate sites was made after consideration of the large number of planning applications granted since the NDP process began see NDP Section 9.</p>

Reference Number	Comment	Llangarron Parish Council Response
	<ul style="list-style-type: none"> • At the top of the priorities should be electric vehicle (EV) charging points which are vital to our future. These should be a requirement for all planning applications. 1 • Fast broadband connections. With increasing numbers of people operating their businesses from a home office it is essential that broadband facilities keep pace with a growing demand for greater speed. • Environmental Protection. • Stronger and rigorous planning regulations need to be established as part of the NDP • Controlling the use of single use plastics in agriculture should be an essential requirement of this plan to protect the soil, wildlife and residents. As all plastics degrade, Polytunnels should become unacceptable as a pollution risk. • Growing crops for bio-digesters on prime land is not sustainable and creates a damaging monoculture. • Stopping agriculture run off from agri-businesses into the water courses to prevent pollution by chemical nutrients. • Characterisation of Llangarron • We do not recognise the REDACTED agricultural based place this plan seems to imply. 	<p>Refer to Policy TRA1: Promoting Sustainable Transport in New Developments - developments should:</p> <p>4. Include suitable provision for electric charging points which are accessible to car parking spaces for residents, employees and visitors;</p> <p>Refer to Policy COM1: Communication Proposals for new development including change of use where appropriate should allow for the provision of a high speed broadband network within the site.</p> <p>Refer to Policy SUS1, ENV1: Landscape and biodiversity and Policy ENV2: Protecting historic assets and settlement character.</p> <p>This is not a planning policy matter but reducing plastic consumption may be addressed in future Government regulations and law.</p> <p>Types of crops are not controlled by planning policy. Refer to Policy EMP1: New agricultural buildings and poly tunnels 5. Designs should incorporate energy and resource efficiency measures and minimise light pollution to protect dark skies. Any such measures should have minimal impact on the landscape. They should seek to minimise environmental impact, for example, impact on water courses, ecology and biodiversity. Consideration should be given to the safe disposal of waste materials.</p> <p>Refer to Policy EMP2: Tourism and rural diversification. Refer to Policy HOU4: House Extensions</p>

Reference Number	Comment	Llangarron Parish Council Response
	<ul style="list-style-type: none"> • Tourism has overtaken agriculture as our main industry but this is not recognised in the plan. We should not be trying to live in the past but be trying to plan for a better future. • Home based businesses ought to be encouraged as sustainable because residents live and work in the community and aid climate change through reduced travel. • The development of micro and small business enterprises should be positively encouraged. Where for example is the zoning for small scale commercial units in this plan? Dark Skies • Tourism in Llangarron has growth potential with significant employment upside. Farming and agri-business does not. Accordingly the quality of the environment for the visitors and residents needs to be protected. It is the famous long views and narrow lanes of this part of Herefordshire that are its attraction. Tourists and residents expect a green experience and not bright lights in the countryside. All new developments should adhere to a dark skies policy that at a minimum ensures: 1. Lighting is designed to minimise the risk of light spillage beyond the development site boundary. 2. Corridors for bats and other light sensitive species are incorporated. 3. No agricultural lighting is visible during the hours of darkness in Polytunnels, chicken sheds or other agriculture related buildings. • Community Facilities Policy CSU1 <ul style="list-style-type: none"> • The last pub in the parish – The Royal Arms – is for many at the heart of the community. It should be given formal protection as an asset of community value in the NDP. • This NDP fails to plan for community consultation over the use of Section 106 contributions from developers. The few 	<p>Proposals for live/work accommodation which support local employment opportunities will be encouraged.</p> <p>Dark skies are mentioned in Policy ENV1: Landscape and biodiversity and Policy EMP1: New agricultural buildings and poly tunnels. Policies are supported by relevant statutory consultees or there were no comments.</p> <p>The pub could be nominated as a community asset but this is not planning policy.</p> <p>Refer to Policy CSU1.</p>

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	<p>community facilities we have need to be protected and sustained. If we want to keep our historic church buildings and these are real community hubs money should be used from 106 sources. With low attendance figures at church services and high maintenance costs there is a very real viability issue for the future. The evolution from House of God to House of Good is already taking place –a concept voiced by Gus O’Donald, Cabinet Secretary 2005-11 on Radio 4 PM on 19.10.20. 2 We believe residents of Llangarron Parish feel strongly about sustainability, environmental issues and the quality of life but that this NDP has missed the opportunity to look ahead in a way that matches their expectations. It could be much, much better. Please reject it in its current form and send it back for refining, strengthening and improving.</p>	
26	Powell – page 158-388 of submission from HCC which has been sent separately	See separate Table.
27	<p>I believe that all the proposed NDP boundaries for Llangarron village are far too restricted. They will strangle the life out of a once large and thriving community which supported shops, pubs, a school, a garage, etc, etc.... Llangarron has always been a scattered community without a traditional 'main street', so the imposition of a tight boundary at this stage is artificial, and excludes many important village properties, such as the council developments at Herbert’s Hill and Garron view. Llangarron will become REDACTED</p> <p>I have looked at this document, and I would broadly agree with much that it has to say. However I wish to object in the strongest terms to the irrational and hugely restrictive settlement boundary which has been drawn around Llangarron, which is a large, widespread community. As its</p>	<p>Refer to the Consultation Statement. The settlement boundaries were informed by informal community consultation and approved by the Parish Council. They are widely supported by many local residents, as evidenced in responses to the Regulation 14 and Regulation 16 consultations.</p> <p>Also see paragraph 3.1 Part 9 regarding recent planning decisions including appeals.</p> <p>The Llangarron Policies map includes existing commitments and the village has seen considerable development pressure in recent years. Rural services are under pressure nationally but the village will continue to see new housing development over the lifetime of the NDP.</p>

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	<p>proponents well know, all talk of 'sensitive development ' and facilitating jobs and employment becomes void when the vast majority of village properties are excluded. REDACTED.</p> <p>REDACTED. REDACTED. Since I have lived here I have seen the loss of the vicarage, the shop and the garage, making it necessary to use the car to access ALL services. My fear is that Llangarron will continue its steady decline REDACTED.</p> <p>The chances of newlyweds arriving here to start a business and raise a family, REDACTED will be next to zero if this plan is adopted. Llangarron has, until now, been a real, working village which happens to be beautiful. It will not cease to be beautiful if small scale developments are allowed.</p> <p>On a other note, I would just point out a small error in Policy CSU1 : As far as I'm aware, the only public play space in the parish is connected to Llangrove Village hall, contrary to what is stated.</p> <p>I hope you will treat this point of view with the seriousness it deserves. The future of Llangarron depends on it</p>	<p>Refer to NDP Policy SUS1:</p> <p>4. New residential development should be located within the identified settlement boundaries of Llangrove, Llancloudy, Llangarron and Three Ashes and should contribute to a suitable mix of housing in terms of type, size and tenure to promote strong, balanced communities, and in particular meet the needs of young families, the elderly and people with disabilities. The precise housing mix should address the changing needs of the parish over the plan-period in order to support local community and economic wellbeing;</p> <p>Refer to Policy HOU1:</p> <p>1. Development should support a mix of house types and tenure, with an emphasis upon smaller starter homes and affordable family accommodation.</p> <p>Policy CSU1 sets out: The following community facilities in Llangarron Parish are identified on the Policies Maps and protected: 1. Llangrove Village Hall 2. Llangrove Academy and play space. The play space at the Academy is for the pupils.</p>

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28	<p>REDACTED. It has caused much division REDACTED. Transparency is the name of the game! But it hasn't been transparent – REDACTED. A meeting took place on 15 July 2019 which was promoted as a training meeting for newly elected councillors and as such, no minutes were taken. REDACTED.</p> <p>It certainly does not give me, REDACTED, confidence that the proper rules have been observed in producing this very important document.</p> <p>There will be many who have no access to computers and will have no idea what is going on with the NDP, let alone know they even have a chance to make further comments. Access to meetings has understandably been harder during this Covid year and as was suggested but not carried out, household distribution of an informative community leaflet at this next stage would have been beneficial. The main aim of the NDP is to guide the way forward for future generations in terms of development. Every village wishes development to be minimised to retain its character and quality of life. Llangrove has seen more housing than ever in very recent years and not all of these are organically designed houses or in keeping with size or character of the village.</p> <p>This has been disappointing, and the community has regularly said there is a need in the Parish for smaller houses suitable for the young and old alike but the NDP does not reflect this. Unfortunately, an application for 8 Passive houses in Llangarron, four of which were 2 bedroom semis received strong opposition and this seemed a missed opportunity to bring much needed smaller homes to the village. Llangrove has already taken an abundant</p>	<p>Refer to the Consultation Statement and paragraph 3.1 Part 1 for details about the lengthy and extensive informal and formal consultation processes which have informed the preparation of the Plan. Also see paragraph 3.1 Part 6. The Parish Council has followed Government guidance in relation to consultation during COVID restrictions.</p> <p>Many residents have submitted responses supporting the Plan at Regulation 14 and Regulation 16.</p> <p>Online Parish Council meetings were open to the public. Consultees have been invited to submit written representations throughout the process and all comments have been considered at all stages.</p> <p>The NDP cannot be used to influence proposals which already have planning consent but sets out a positive framework to inform decisions on future planning applications in the Parish. The NDP addresses issues such as protecting local character and promoting high quality design - refer to Policies ENV1 and ENV2.</p> <p>Refer to NDP Policy SUS1: 4. New residential development should be located within the identified settlement boundaries of Llangrove, Llancloudy, Llangarron and Three Ashes and should contribute to a suitable mix of housing in terms of type, size and tenure to promote strong, balanced communities, and in particular meet the needs of young families, the elderly and people with disabilities. The precise housing mix should address the changing needs of the parish over the plan-period in order to support local community and economic wellbeing; Refer to Policy HOU1:</p>

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	<p>share of parish housing with over 40 proposed, or houses built, in the last 3-4 years. REDACTED and this village is in real danger of losing its charming character and being overdeveloped. Will the NDP offer some respite time for new builds in Llangrove?</p> <p>Comments on the boundaries Llangarron is a widely dispersed village and to-date has a total of 12 new builds but the restrictive proposed boundary does not allow any scope for further development in the next ten years which seems at odds with strategic policy. Not even the Village Hall is within the boundary and no explanation has been given for this. Neither North or South areas of Llangarron village have been included as separate boundaries when both are similar in terms of size to Three Ashes. There are other planning commitments in all areas that have been agreed but are not highlighted – there should be a consistent policy or the reasons should be explained as to why planned housing during this NDP period is not shown. Conclusion I certainly wish to see our NDP succeed as soon as possible but some areas need further addressing.</p> <p>There are many in the community who feel their points of view are not being considered REDACTED. I do not see this as democratic or representative. I hope as the External Examiner you understand my various concerns and can help push this NDP forward in a fairer, more inclusive, and constructive way</p>	<p>1. Development should support a mix of house types and tenure, with an emphasis upon smaller starter homes and affordable family accommodation.</p> <p>Refer to the Consultation Statement. The settlement boundaries were informed by informal consultation. The Parish Council is the responsible body for the NDP. The vote on 1st December 2020 was 7 to 1 in favour of the published boundaries. A majority of respondents have expressed support for the boundaries in the consultations at Regulation 14 and Regulation 16.</p> <p>The Policies maps will be updated and finalised by HC to include all relevant commitments prior to Referendum.</p> <p>There has been a majority of residents who responded in support of the document at Regulation 14 and Regulation 16.</p> <p>The Referendum result will determine whether the Plan should be used to determine planning applications in the Parish and all residents on the electoral role will be invited to vote.</p>
29	My overall feeling after reading the Regulation 16 version of the NDP is one of weary disappointment. There have been	The Submission NDP was amended and updated and incorporated a number of changes in response to comments submitted during the

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	<p>some small changes from Regulation 14 but the plan itself is very narrowly focused on preserving the village of Llangarron as it is at the moment. This REDACTED approach to the NDP has also resulted in a plan which is very weak on Environment & Employment. The pandemic has clearly shown that we have a very vibrant, outward looking and caring community across the wider Parish with a diverse mix of people with different skill sets. REDACTED.</p> <p>The NDP utters platitudes on social & environmental issues with no tangible intent. The resultant Plan raises the drawbridge to change in the next 10 years. This is an outcome that I do not believe supports the needs of the Community at large. I therefore urge you to reject the plan in its current form so that we can strengthen & improve it to meet the challenges & opportunities of the next 10 years. Detailed Comments.</p> <p>1. Consultation. This would be expected to encompass open discussion and information gathering before reaching a decision. Town Hall style meetings rather than 'closed' Parish Council style meetings would have allowed the majority view to emerge on some of the more contentious areas (e.g. boundaries) achieving greater legitimacy for the Plan itself. Covid in 2020 is not an acceptable excuse for this failure to listen & engage.</p>	<p>Reg 14 consultation. Refer to the Consultation Statement for more detail.</p> <p>The NDP includes policies for all the settlements, it is not focussed on one settlement.</p> <p>The NDP is a planning policy document and will be used to determine planning applications. It has to plan positively for new development and this is reflected in the wide range of detailed policies which have been drawn up through an extensive process of community consultation and engagement.</p> <p>The NDP contains a number of environmental policies (including SUS1, ENV1, ENV2, ENV3, ENV4, ENG1 and ENG2) which have been supported by the relevant statutory consultees or where they made no comment.</p> <p>Refer to the Consultation Statement and paragraph 3.1 Part 1 for details about the lengthy and extensive informal and formal consultation processes which have informed the preparation of the Plan.</p> <p>The Parish Council has followed Government guidance in relation to consultation during COVID restrictions. Many residents provided written responses to the Plan at Regulation 14 and Regulation 16. The majority of these responses were supportive.</p>

Reference Number	Comment	Llangarron Parish Council Response
	<p>2. Section 6. Sustainability.</p> <p>a. The lack of local transport means that the Community is reliant on the private car – why is there no insistence in SUS1 for electric car charging points in all new developments? Should there be an aspiration for community owned charging points?</p> <p>b. Broadband provision & poor mobile phone signals across the broader Parish are still an issue. Why does SUS1 not address this?</p> <p>c. Where is the resolve to use S106 contributions from Developers to improve the sustainability of the Community? 1</p> <p>3. Section 7. The Environment. a. Pages 28-29 Flooding. The unprecedented rainfall in early 2020 clearly demonstrated that the problems in the Parish were largely due to water run-off from farmland – 2 examples are the C1248 between Thorns & Llangarron and U71207/U71208 at Biddlestone. The lives of the residents would be</p>	<p>Online Parish Council meetings were open to the public. Consultees have been invited to submit written representations throughout the process and all comments have been considered at all stages.</p> <p>Refer to Policy TRA1: Promoting Sustainable Transport in New Developments - developments should:</p> <p>4. Include suitable provision for electric charging points which are accessible to car parking spaces for residents, employees and visitors;</p> <p>Refer to Policy COM1: Communication Proposals for new development including change of use where appropriate should allow for the provision of a high speed broadband network within the site.</p> <p>Refer to Policy CSU1: Protecting Existing Community Facilities and Supporting Investment in New and Improved Facilities Where appropriate developers should contribute towards the provision of new community facilities and infrastructure both onsite and offsite, to help support sustainable growth. New development in the Parish will help deliver community needs through Section 106 Agreements, CIL or any other contributions that may become available during the period of the Plan.</p> <p>Refer to Policy ENV3: Flooding and ENV4: Public sewerage network and wastewater treatment works (WwTW)</p> <p>The NDP is a planning policy document not an action plan. The Parish Council is addressing such issues through other means.</p>

Reference Number	Comment	Llangarron Parish Council Response
	<p>significantly improved if the Parish addressed the issue of persuading landowners to take mitigating actions to reduce run-off. Why does the NDP not include a policy to use the available skills within the Community to create flood mitigation schemes?</p> <p>b. Pages 29-31. Waste Water Treatment & Water Quality. It is a matter of public record that 66% of waterway pollution is from agricultural run-off. The phosphate levels in the Wye & the Lugg are causing significant concern. A recent Environment Agency report shows that the Gamber/Garron 'fail' on pollution and that agriculture is the cause. Surely we have a duty to ensure that no agricultural development is allowed which will risk nutrient run-off into the Garron/Gamber thereby exacerbating the existing problem and this statement should be included in the NDP</p> <p>4. Section 8. Employment. a. Para 8.12 (page 34) states that 'a large proportion of residents in the Parish are still employed in agriculture or agriculturally related enterprises'. Where are the facts to support this? – what constitutes 'large'? As a rural parish, we may have a higher percentage than urban areas but figures from Herefordshire County Council suggest that the number employed in agriculture is small and in continuing decline. Why is the NDP peddling this outdated view of the Parish? – it acts as a constraint on the opportunities available to the Community.</p> <p>b. Para 8.13 & EMP1. It is (in my view) unbelievable that the NDP includes a statement of support for new Agri-businesses such as Poly tunnels. The arguments against these have been well-rehearsed by the Community over the last 10 years and the most recent application at Biddlestone</p>	<p>Refer to Policy EMP1: New agricultural buildings and poly tunnels They should seek to minimise environmental impact, for example, impact on water courses, ecology and biodiversity. Consideration should be given to the safe disposal of waste materials.</p> <p>Types of crops are not controlled by planning policy.</p> <p>The Parish is a rural area and the NDP notes this but also includes policies which support rural diversification in recognition of ongoing changes in the economy and local employment opportunities.</p> <p>Policy EMP1: New agricultural buildings and poly tunnels sets out the criteria for assessing planning applications for poly tunnels to ensure they are sensitively located and address local environmental issues. The policy can only be applied where planning consent is required. The policy does not 'support' such applications but seeks to</p>

Reference Number	Comment	Llangarron Parish Council Response
	<p>has been rejected by Herefordshire’s Planners. It is also surprising that there is no clear statement on Intensive Poultry Units (IPUs) or Biodigesters. All of these Agri-businesses enjoy the financial benefits of being located on a farm (including no business rates!) without providing significant employment for local residents. The environmental argument against these businesses is very strong & the NDP misses the opportunity to be clear about this – letting down the wider Community.</p> <p>c. Home based businesses. The NDP misses the opportunity to clearly support the expansion of home-based businesses within the community. The last sentence in Para 8.10 is meaningless as there is no proactive policy in EMP1.</p> <p>5. Section 9. Housing</p> <p>a. The disappointment here is that I cannot see how the NDP delivers on the Objective (page 38) to deliver ‘housing ... to meet the needs of all sectors of the community’. The recently completed houses in the Parish are priced within the Executive category. Is it not the case that the majority of the ‘Approved’ housing will also be of the Executive type?</p> <p>b. Surely, the fact that The Parish and the Planners have historically failed to work with local landowners to include developments of smaller housing units (for (e.g.) Starters and End of 2 Life) should not simply cause us to walk away from finding a solution. There are still pockets of land which could be developed within the Parish - let us open ourselves up to a new approach and try to meet the needs of the wider Community.</p>	<p>set out stringent criteria which must be met in the event of an application.</p> <p>The NDP explicitly supports the creation of live work / units. Refer to Policy HOU4: House Extensions. Proposals for live/work accommodation which support local employment opportunities will be encouraged.</p> <p>In the absence of an NDP nearly all housing applications and approvals have been for ‘Executive type’ developments. The NDP seeks to address this. Refer to NDP Policy SUS1:</p> <p>4. New residential development should be located within the identified settlement boundaries of Llangrove, Llancloudy, Llangarron and Three Ashes and should contribute to a suitable mix of housing in terms of type, size and tenure to promote strong, balanced communities, and in particular meet the needs of young families, the elderly and people with disabilities. The precise housing mix should address the changing needs of the parish over the plan-period in order to support local community and economic wellbeing; Refer to Policy HOU1:</p> <p>1. Development should support a mix of house types and tenure, with an emphasis upon smaller starter homes and affordable family accommodation.</p>

Reference Number	Comment	Llangarron Parish Council Response
	<p>c. The Llangarron settlement boundary (Map 6) looks very defensive – the exclusion of a historic part of the village (on the other side of the bridge), the Village Hall and the 2 ‘Council’ house estates makes a mockery of the word Community. Presumably the objective of this is to deny housing possibilities to ‘infill’? It also seems very odd that a site with planning permission is not shown as either a planning commitment or within the settlement boundary – why is this?</p> <p>6. Section 13. Energy</p> <p>a. Given the Climate Emergency, Draft Policy ENG2 looks REDACTED. As a community we should be whole-heartedly supporting alternative energy technology (solar, battery storage & wind), particularly if they are linked to provision of energy to our Community. Where is our commitment to Zero Carbon for the Parish?</p>	<p>Refer to the Consultation Statement. The settlement boundaries were informed by informal consultation. The Parish Council is the responsible body for the NDP. The vote on 1st December 2020 was 7 to 1 in favour of the published boundaries. The majority of respondents have expressed support for the boundaries in the consultations at Regulation 14 and Regulation 16. Policy maps will be updated as required by Herefordshire Council and will be available as an online resource.</p> <p>Refer to Policy SUS1 and other NDP Policies which promote sustainable development including:</p> <p>ENV1: Landscape and biodiversity</p> <p>ENV2: Protecting historic assets and settlement character.</p> <p>ENG1: Proposals for Incorporating Renewable Technology in New Developments</p> <p>ENG2: Proposals for New Renewable Energy Technology</p> <p>Such policies are supported by statutory consultees or there were no comments.</p>
30	<p>As in previous iterations their policies seem to continue to incorporate active travel well: P16 Sustainable Development: SUS1 – paras 2, 7i & ii, great P37 Tourism & rural Diversification: EMP2 – para 3, also good</p> <p>P50 New Housing Development: HOU1 – in para 5 (or a new para) would have liked to have seen something about encouraging / facilitating walking and cycling here in line with SUS1 (eg para 2), EMP2 and TRA1. P52 Subsequent Housing policies (HOU2 – 3) could also do with reference back to following HOU1 plus the additional requirements described in them.</p> <p>P57 Promoting Sustainable Travel in new developments: TRA1 good to see para 1, but these could also be</p>	<p>The Parish Council cannot introduce new policy wording at this stage, but the examiner may recommend detailed modifications in order to ensure the Plan meets the required basic conditions.</p> <p>These are positive suggestions and the Parish Council would support the proposed changes by the statutory consultee if the examiner considers it would be appropriate to make them.</p>

Reference Number	Comment	Llangarron Parish Council Response
	<p>reinforced by the other policies as above. Para 6 could add “and cyclists” after dangers to pedestrians. Para 10 list examples of developer contribution – they could also include Provision of bus shelters and secure cycle parking at bus stops. Para 12 is particularly helpful as travel in the area is dominated by the A40 dual carriageway and parish lanes offer a valuable alternative for cyclists.</p> <p>P62 Community Facilities: CSU1 – could also include mention of provision of facilities at community facilities that encourage travel to them by active travel rather than by car to support the other policies mentioned above</p>	
31	<p>I have just read the draft NDP for my Parish having a seen a blackboard outside someone’s house in the village, that a resident had put out. This is the first I have really seen about a Neighbourhood plan and would like to make comments for the assessor.</p> <p>1. I would like to see more houses being built for young people like myself to live in the village of Llangarron. There is a really good primary school at Llangrove the next village and also a pub both under 2 miles away. So ideal for young couples with children.</p> <p>2. It would also be good to see more events in the new Garron Centre for young people in the village REDACTED .</p> <p>3. Also the village hall only has a mat bowls club, nothing else except Parish Council meetings.</p> <p>4. The road links are very good as only 2 miles from the dual carriageway. I do not understand why it says in the</p>	<p>See Consultation Statement and paragraph 3.1 above for details of the extensive consultation.</p> <p>The NDP supports further suitable housing development within the settlement boundaries - see Policy HOU1.</p> <p>This would be an action not a planning policy.</p> <p>This would be an action not a planning policy.</p>

Reference Number	Comment	Llangarron Parish Council Response
	<p>draft plan that there is no way out in floods as that is not correct.</p> <p>5. I wish there had been notices about this NDP before now and also open meetings for the public so people could voice opinions. I am not aware of seeing any notifications about this plan REDACTED</p> <p>6. I disagree with the boundary for Llangarron as residents who have lived in the village talk about how it was much larger including both sets of Council Houses and some of them have been told they don't live in the village according to the restrictive boundary marked up for the village</p> <p>7. It would be good to have some parking for the Garron Centre and church and also a common area for some sports but the plan does not seek to find one.</p> <p>8. The village of Llangarron now has a few new houses and is starting to gain more people who represent all walks of life, but there is room for more sensitively situated housing at each end of the village unfortunately this draft NDP is staying to the contrary trying to stop any further development in the village</p>	<p>Flooding including floods on roads have been problems in the Parish in recent years including residents being trapped and roads closed.</p> <p>Notices have been put up on parish notice boards at all stages of the NDP process - refer to Consultation Statement and 3.1 above.</p> <p>The settlement boundaries were informed by informal consultation. The Parish Council is the responsible body for the NDP. The vote on 1st December 2020 was 7 to 1 in favour of the published boundaries. The majority of respondents have expressed support for the boundaries in the consultations at Regulation 14 and Regulation 16. The village of Llangarron has never been 'much larger' - see paragraph 3.1 Part 12.</p> <p>Refer to Policy CSU1: Protecting Existing Community Facilities and Supporting Investment in New and Improved Facilities - this supports a car park and play area if land becomes available.</p> <p>Refer to NDP Policy SUS1:</p> <p>4. New residential development should be located within the identified settlement boundaries of Llangrove, Llancloudy, Llangarron and Three Ashes and should contribute to a suitable mix of housing in terms of type, size and tenure to promote strong, balanced communities, and in particular meet the needs of young families, the elderly and people with disabilities. The precise housing mix should address the changing needs of the parish over the plan-period in order to support local community and economic wellbeing;</p> <p>Refer to Policy HOU1:</p> <p>1. Development should support a mix of house types and tenure, with an emphasis upon smaller starter homes and affordable family accommodation.</p>

Table 2 - Reference 26 (Powells)

Comment	Parish Council Response
<p>2. AECOM Report, Development Boundaries & Future Residential Development</p> <p>2.1. Llangarron Parish Council instructed consultants AECOM to undertake a 'Site Options Assessment for the Llangarron NDP in November 2019. This report made a full assessment of candidate sites using an ecological, landscape and policy led approach. We append a copy of the AECOM report to this consultation response and shall provide a full copy along with this document to the Planning Inspector at examination stage should our points raised here in not be carefully considered and adopted.</p> <p>2.2. The Parish Council have not sought to allocate any further housing within their NDP, yet they have proposed to implement a tightly drawn settlement boundary and prevent residential development outside of it. We believe this is in conflict with the Core Strategy and as such, the Parish either need to allocate additional housing land now, remove the proposed settlement boundary OR revise their HOU1 policy to ensure is aligns with policy RA2 of the Core Strategy. We have provided an alternative settlement boundary for the settlement of Llangrove specifically and Llangarron in order to relax the development boundary should the boundary remain. As mentioned above, if the proposed boundary remains in the plan going forward, Policy HOU1 should be revised as per our recommendations below in TABLE 1 to ensure the policy does not conflict with Core Strategy policy.</p> <p>2.3. As with all Parish Council's in Herefordshire, the figure set for development is a 'Target' and reflects the MINIMUM number of dwellings developable. At the point of the AECOM report being produced, the target was 64 dwellings and the residual was 15. This</p>	<p>The settlement boundaries were informed by informal public consultation and approved by the Parsh Council - refer to the Consultation Statement. They are supported by the majority of respondents as evidenced in responses to Regulation 14 and Regulation 16 consultations. The call for sites was in late 2018 to early 2019.</p> <p>The Parish Council decided not to include site allocations in the NDP. The reasons for this are set out in the NDP: 9.29 development in Llangarron Parish, as evidenced by the recent high level of commitments, and the constraints of the Parish has reached the stage where further applications for new housing development will place a significant strain on local infrastructure including, the highway network, surface water and drainage in a Parish which is already subject to regular flooding. For these reasons, the Llangarron Neighbourhood Development Plan has not sought to allocate additional new development sites. 9.30 In summary Llangarron Parish has already met its minimum housing target and there is no need for further site allocations in the NDP. In addition, there has been a clear message from Parishioners that further site allocations in the NDP would not be supported.</p> <p>The settlement boundaries are not in conflict with the Core Strategy and would allow for some further limited development., subject to addressing the other policies in the NDP.</p> <p>The most up to date housing figures show that there are 105 commitments and recent developments which is 65% above the minimum target. This supersedes information in paragraph 9.26 in the NDP.</p>

Comment	Parish Council Response
<p>is now likely to have reduced with 12 months having passed since the AECOM report was finalised with additional units having been approved through the Parish.</p>	<p>(Refer also to paragraph 9.26 in the NDP: This shows that there have been 31 completions since 2011 and 65 commitments giving a net residual total of -32 houses for the NDP area. That means that housing developments in the Parish have delivered 32 houses over and above the minimum housing target set out in the Core Strategy for the Plan period up to 2031 ie over 50% above the target.)</p>
<p>3. The National Planning Policy Framework (NPPF)</p> <p>4. The AECOM report makes reference to several paragraphs of the NPPF in respect of development in rural areas. The NPPF was updated and published in February 2019.</p> <p>4.1. Paragraph 68 of the NPPF states: 4.1.1. "small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built out relatively quickly. To promote the development of a good mix of sites local planning authorities should: 4.1.2. a) identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved; 4.1.3. b) use tools such as area-wide design assessments and Local Development Orders to help bring small and medium sized sites forward; 4.1.4. c) support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes; a 4.1.5. d) work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes.</p>	<p>Refer to the reasons set out above as to why the NDP does not include site allocations.</p> <p>NDPs do not have to include site allocations - that is a matter for the Parish Council. The settlement boundaries will allow for some small scale further development in the Parish over the plan period. The NDP includes planning policies to provide a positive planning framework to guide decisions on planning applications for new housing.</p>

Comment	Parish Council Response
<p>4.2. Paragraph 78 actively encourages the siting of dwellings where it will support local services and enhance local vitality. Local services in the context of Llangarron and Llangrove being schools, pub (also acting as shop), church and village hall.</p> <p>4.3. Paragraph 79 is not entirely relevant where considering the allocation of housing sites, or where the Core Strategy policy RA2 confirms development within or adjacent to a settlement is applies to the site in question. In that instance, such a site would only be considered open countryside where it does not meet the policy criteria of RA2. The NDP cannot seek to conflict with the Core Strategy.</p>	
<p>5. Herefordshire Core Strategy Policy RA2</p> <p>5.1. The Herefordshire Core Strategy Policy RA2 sets out the LPA's policy in respect of Housing in Settlements outside Hereford and the market towns. The policy position is as follows: RA2</p> <p>5.2. Policy RA2 clearly states NDP's WILL BE REQUIRED to allocate land for housing to meet the relevant targets. The relevant target for the Ross on Wye Housing Market Area (HMA) is 14% growth during the plan period. The policy places a MINIMUM growth target on each HMA. Any proposal to develop NDP policy which would prevent the open delivery of housing where is complies with RA2 would conflict with the Core Strategy. Our proposed revision to proposed draft policy HOU1 below in Table 1 would align NDP policy with the Core Strategy.</p>	<p>This is not correct. Policy RA2 says: <u>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.</u></p> <p>The minimum housing target for Llangarron has been exceeded already around 65% see above.</p>
<p>6. Housing Land Supply (5yhls)</p> <p>6.1. The recently published LPA 5yhls figure within their Annual Monitoring Report (AMR) demonstrates a figure of 3.9 years of supply. The policies relating to the delivery of housing in the authority area are therefore considered out of date and carry less weight. An NDP will not lose its weight until 5yhls is less than 3 years, BUT the fact the LPA are failing to deliver sufficient housing is a material consideration in the planning balance under Paragraph 11(d) of the NPPF. A copy of the AMR is appended to this report and shall be</p>	<p>The Parish Council was aware of the implications of the NPPF when it made the decision not to include site allocations for housing. The current LPA 5 yr housing supply figure is 4.2 years. Many parishes have not met their minimum housing target, Llangarron has exceeded by around 65%</p>

Comment	Parish Council Response
<p>provided to an Inspector at submission stage. We believe adopting the NDP without adopting our proposed changes would materially damage the LPA's ability to meet their ongoing housing need obligations in the Ross on Wye HMA.</p>	
<p>7. Government White Paper (WP) 7.1. Fundamental are the possible changes to the planning system contained in the White Paper, 'Planning for the Future' published in August 2020. This proposed a major change to Local Plans and to Development Management. The WP is the subject of consultation until 29th October after which further information is expected. It has generated much comment and debate. 7.2. We believe the housing need for Herefordshire generally will significantly increase as a result of any adoption of WP housing need policy proposals. As such, the LPA needs to ensure NDPs do not impose restrictions on the LPA's ability to deliver housing.</p>	<p>The NDP has been prepared to have regard to national planning policy as set out in the NPPG, PPG etc. The PC may decide to review the Plan if there are changes to national and local planning policy at some point in the future.</p>
<p>8. Conclusion 8.1. As it stands, we consider the following to be the case: 8.1.1. We consider the Llangarron Parish Council draft NDP housing and related policies to be unsound because of being inconsistent with the Core Strategy and the NPPF. 8.1.2. Our proposed revisions to NDP policy are marked below in Table 1 would assist with making the proposed policy sounder and in line with the Core Strategy and NPPF. 8.1.3. 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. 8.1.4. Herefordshire Council 5yHls 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 Council's ability to deliver the required numbers of housing to meet its HMA targets. 8.1.5. 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</p>	<p>Where relevant, these matters will be considered by the examiner through the examination process.</p> <p>The PC cannot make changes to the NDP at this stage but the Examiner may recommend modifications to ensure the Plan meets the required basic conditions. The PC therefore refers the Table of Proposed Changes to the Examiner for his / her consideration.</p>

Comment	Parish Council Response
<p>needs to create flexibility in the plan to accommodate an increased housing need and minimum target.</p> <p>8.1.6.Overall, we don't consider the plan even with revisions would be suitable to move to Regulation 16 stage. The NDP policy needs to be carefully reconsidered considering above and be the subject of a new draft Regulation 16 consultation, including an additional call for sites. The LPA should ensure there is flexibility for suitable sites identified in the AECOM report to be brought forward through the NDP before the NDP can move to Regulation 16 stage.</p>	
<p>Table of Proposed Changes</p>	<p>The Parish Council will leave the proposed detailed changes to the Examiner. Only those changes considered necessary for the Plan to meet the basic conditions or to update information should be made.</p>

5.0 Conclusion

- 5.1 The vast majority of responses were positive and supported the NDP.
- 5.2 Although the matters covered in Section 4 are of concern to some local residents and landowners, the Parish Council can demonstrate that they are either unfounded, or that they have been addressed in the NDP and supporting documents, or that they are not appropriate for addressing in an NDP as they go beyond planning policies.
- 5.3 The Parish Council accepts that there will always be a range of opinions and interests and that it is not possible to fully meet the expectations of all respondents. However the Parish Council believes that it has produced a document which accords with the needs and aspirations of the majority of respondents and more particularly of respondents who are resident in the Parish. The Parish Council can provide reassurance that the concerns raised have been addressed in the NDP and that the Parish Council has followed an open and transparent process in bringing the NDP to Regulation 16.

Kirkwells

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