

# **Clifford (Herefordshire) Neighbourhood Development Plan**

**Consultation Statement – October 2021**

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## 1. Introduction

- a. The Neighbourhood Planning (General) Regulations 2012 (Localism Act 2011) require a Consultation Statement to set out the consultations undertaken for the NDP.
- b. Part 5 Paragraph 15 (2) of The Neighbourhood Planning (General) Regulations 2012, defines a Consultation Statement as a document which includes:
  - i. details of the persons and bodies who were consulted about the proposed NDP.
  - ii. a description of how they were consulted.
  - iii. a summary of the main issues and concerns raised by the persons consulted.
  - iv. a description of how these issues and concerns have been considered and, if appropriate, addressed in the proposed plan.
- c. This Statement sets out details of all consultation and engagement activity. It lists how the local community and other stakeholders have been involved and how their input has informed the development of the Plan.
- d. The aim of the consultations in Clifford Parish has been to ensure the widest possible understanding of the purpose and content of the Neighbourhood Plan, and to ensure that every resident and stakeholder had the opportunity to contribute to the development of the Plan. The community and stakeholders were kept informed as shown in the Timeline below.
- e. This Statement demonstrates that there has been community and stakeholder engagement and consultation at key stages in the process.

## 2. NDP Consultation Timeline

*Note: Although the Clifford NDP process began in 2013, work upon it did not begin in earnest until 2017 when its purposes was seen as important to the community. The Local Plan was not “made” until October 2015.*

<b>1</b>	<b>15<sup>th</sup> January 2013</b>	Open Meeting held to receive a presentation by Herefordshire Council upon preparing a Neighbourhood Development Plan. The subsequent Parish Council meeting agreed that an application should be made. Application was then made by Clifford Parish Council to Herefordshire Council for the whole Parish Council area to be designated as a Neighbourhood Area.
	<b>Parish Council</b>	
<b>2</b>	<b>8<sup>th</sup> February to 22<sup>nd</sup> March 2013</b>	Designation consultation period opened and closed with no representations having been received.
	<b>Herefordshire Council</b>	
<b>3</b>	<b>25<sup>th</sup> March 2013</b>	Designation confirmed.
	<b>Herefordshire Council</b>	
<b>4</b>	<b>May/December 2013</b>	Limited interest was shown in participating in a NDP Steering Group despite invitations being circulated to the community in October and December.
	<b>Parish Council</b>	
<b>5</b>	<b>12<sup>th</sup> January 2017</b>	Resurgence of interest in preparing a NDP expressed by the Parish Council which agreed to call a public meeting to discuss the matter.
	<b>Parish Council</b>	

<b>6</b>	<b>30<sup>th</sup> May 2017</b>	The first meeting of the Neighbourhood Plan Steering Group took place.
	<b>Steering Group</b>	The minutes of that meeting can be found at <a href="https://cliffordparishcouncil.co.uk/wp-content/uploads/2017/05/30-May-2017.docx">https://cliffordparishcouncil.co.uk/wp-content/uploads/2017/05/30-May-2017.docx</a> The meeting agreed its Terms of Reference - <a href="https://cliffordparishcouncil.co.uk/wp-content/uploads/2017/05/Clifford-NDP-ToR.docx">https://cliffordparishcouncil.co.uk/wp-content/uploads/2017/05/Clifford-NDP-ToR.docx</a> .  A Clifford NDP email address was set up - cliffordnplan@gmail.com
<b>7</b>	<b>6<sup>th</sup> June/3<sup>rd</sup> July 2017</b>	Steering Group met to organise a NDP launch event. The Minutes of the June meeting can be found at <a href="https://cliffordparishcouncil.co.uk/wp-content/uploads/2017/05/6-June-meeting-minutes.docx">https://cliffordparishcouncil.co.uk/wp-content/uploads/2017/05/6-June-meeting-minutes.docx</a>
	<b>Steering Group</b>	
<b>8</b>	<b>16<sup>th</sup> July 2017</b>	Launch event held at Clifford Community Centre between 12.00pm and 3.30pm. This was publicised by a flyer and also a letter delivered to all households.
	<b>Stakeholder Launch Event</b>	



Dear Clifford resident,

On Sunday 16<sup>th</sup> July there will be a public event at Clifford Community Centre to canvass views on the future development of this area.

Clifford is one of the only areas in Herefordshire that does not have a neighbourhood plan. This means that all development is subject to the county plan, or 'core strategy', which does not reflect the specific needs and character of this unique area.

**This is your chance to have a say.**

All views will be brought together in a Neighbourhood Plan for the parish. This will be a defining document with policies that Herefordshire Council will be legally bound to refer to when they are considering any development in the parish, whether that be housing, transport, environment or economic.

**Your views will make a difference.**

A team of volunteers will be on hand to listen and record what you have to say. So, if you can only drop in for a few minutes or would like to use the opportunity to enjoy a free lunch please come and join us.

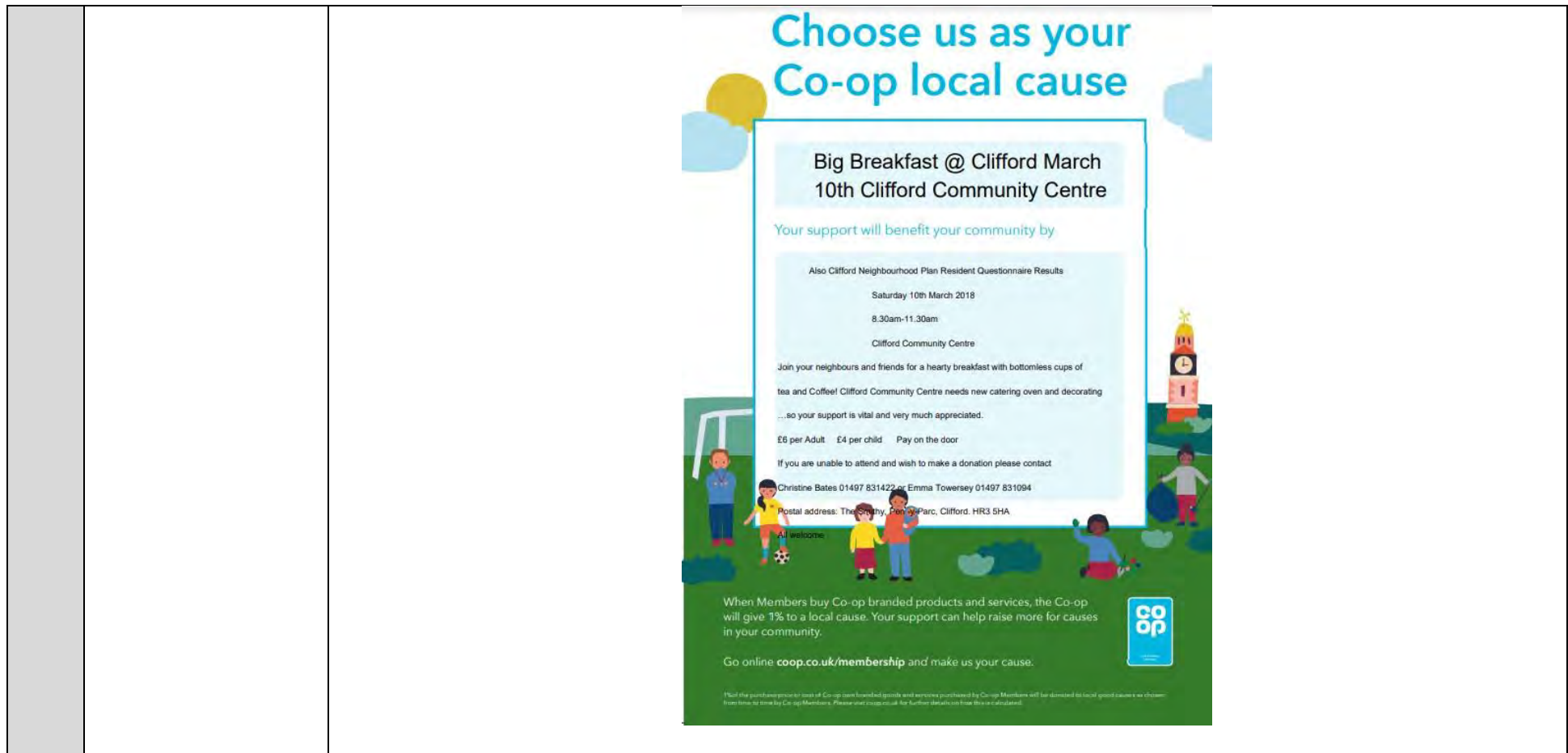
Thank you,  
Clifford Neighbourhood Plan Team

The material presented at the launch event included an information pack that was also made available to those who were unable to attend the event – see [https://cliffordparishcouncil.co.uk/wp-content/uploads/2017/05/CLIFFORD-INFO-DOC-11july\\_12pp.pdf](https://cliffordparishcouncil.co.uk/wp-content/uploads/2017/05/CLIFFORD-INFO-DOC-11july_12pp.pdf)

Some 117 residents attended the event (out of an estimated parish population of 511). A report was prepared upon the feedback received: <https://cliffordparishcouncil.co.uk/wp-content/uploads/2017/05/launch-feedback.pdf>

<b>9</b>	<b>14<sup>th</sup> August; 4<sup>th</sup> September; 28<sup>th</sup> September 2017</b>	Steering Group utilised the feedback from the launch event to inform the development of a resident’s questionnaire and other evidence gathering.
	<b>Steering Group</b>	

<b>10</b>	<b>October 2017</b>	Residents Questionnaire delivered by volunteers.
	<b>Steering Group/Volunteers</b>	
<b>11</b>	<b>31<sup>st</sup> October 2017</b>	Final date for receipt of resident's questionnaire. A 48% response rate (202 responses) from all residents over 16 years of age was achieved.
	<b>Steering Group/Volunteers</b>	
<b>12</b>	<b>6<sup>th</sup> February 2018</b>	Steering Group received the report analysing to results of the Resident's Survey: <a href="https://cliffordparishcouncil.co.uk/wp-content/uploads/2018/02/Clifford-NDP-Report-Version-1.0-low-res.pdf">https://cliffordparishcouncil.co.uk/wp-content/uploads/2018/02/Clifford-NDP-Report-Version-1.0-low-res.pdf</a>
	<b>Steering Group</b>	
<b>13</b>	<b>10th March 2018</b>	The Parish held a Saturday 'community breakfast' at which the Neighbourhood Plan was to be the main business to feed back the findings of the resident's questionnaire. Although it was not that well attended (up to 20 residents), those that did come did highlight a number of issues. The results of the Resident's Questionnaire were also made available by being placed on the Parish Council's website.
	<b>Feedback Event</b>	



<b>14</b>	<b>21<sup>st</sup> May 2018</b>	The Steering Group commenced its work upon producing the NDP. Issues to cover were based upon the various community consultations, including the Resident’s Questionnaire.
	<b>Steering Group</b>	



<b>15</b>	<b>12<sup>th</sup> July 2018</b>	An open public meeting to feed back to the Parish Council and residents was held after the Parish Council meeting in order to discuss options for settlement boundaries for Clifford and Priory Wood.
	<b>Parish Council/Steering Group</b>	
<b>16</b>	<b>October 2018 – January 2020</b>	The Steering Group met intermittently to progress the production of the draft NDP.
	<b>Steering Group</b>	NB subsequently Covid led to further delays in producing the SEA, HRA and approval for consultation.
<b>17</b>	<b>10<sup>th</sup> September 2020</b>	Parish Council approved draft NDP to proceed to the Regulation 14 consultation stage.
	<b>Parish Council</b>	
<b>18</b>	<b>22<sup>nd</sup> September 2020</b>	Steering Group met to finalise Regulation 14 consultation arrangements.
	<b>Steering Group</b>	
<b>19</b>	<b>26<sup>th</sup> October to 8<sup>th</sup> December 2020</b>	Regulation 14 consultation period opens
	<b>Regulation 14 Consultation</b>	<p>The Statutory Notice was placed on various notice boards around the Parish and upon the Parish Council’s website: <a href="https://cliffordparishcouncil.co.uk/wp-content/uploads/2020/10/1.-Statutory-Consultation-Notice-1.pdf">https://cliffordparishcouncil.co.uk/wp-content/uploads/2020/10/1.-Statutory-Consultation-Notice-1.pdf</a></p> <p>The NDP was placed upon the Parish Council’s website.</p> <p>Herefordshire Council’s Library Service would not make copies of the NDP, SEA and HRA available within its libraries because of Covid. Hay-on-Wye Library was prepared to do so but unfortunately Wales went into another period of lockdown just as the consultation period began. It did, however, make copies of the plan available for public viewing from 9<sup>th</sup> November when it reopened.</p>

Loan copies were made available through contacting a number of members of the NDP Steering Group. The number of NDP Steering Committee members with loan copies was increased as a consequence of the lockdown.

A leaflet advertising the Regulation 14 consultation was circulated to all households within the Parish.

The following organisations were consulted at the beginning of the consultation period by email:

1. Herefordshire Council
2. Natural England
3. Historic England
4. English Heritage
5. Highways England
6. Dwr Cymru Welsh Water
7. The Environment Agency
8. National Trust
9. Natural Resources Wales
10. Severn Trent Water
11. Herefordshire Primary Care Trust
12. Wye Valley NHS Trust
13. National Grid
14. RWE Npower Renewables Limited
15. West Mercia Police
16. Hereford and Worcestershire Fire and Rescue Service
17. Marches Local Enterprise Partnership
18. Sport England
19. 2gether NHS Trust
20. Campaign to Protect Rural England
21. Hereford and Worcester Chamber of Commerce
22. Woodland Trust
23. Herefordshire Wildlife Trust
24. Stonewater Housing Association
25. Homes England

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|--|---|
|  | <ol style="list-style-type: none"><li>26. Herefordshire Housing</li><li>27. Diocese of Hereford</li><li>28. Education Funding Agency</li><li>29. Coal Authority</li><li>30. Arriva Trains Wales</li><li>31. Great Western Trains Co. Limited</li><li>32. Network Rail (West)</li><li>33. Hereford Travellers Support Group</li><li>34. Powys County Council</li><li>35. Brecon Beacons National Park</li><li>36. Cusop Parish Council</li><li>37. Dorstone Parish Council</li><li>38. Wyeside Group Parish Council</li><li>39. Eardisley Group Parish Council</li><li>40. Brilley Parish Council</li><li>41. Hay on Wye Town Council</li><li>42. Llanigan Community Council</li><li>43. Clyro Community Council</li></ol> |
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## CLIFFORD NEIGHBOURHOOD PLAN

### Consultation on Draft Plan

Herefordshire Core Strategy, prepared by Herefordshire Council, requires parishes with villages to provide guidance about future development in the parish. Clifford Parish Council has now completed a draft plan laying out a future vision for the parish, covering aspects such as the accommodation of new housing, sustainable development, local business, and environment protection, and seeks your views upon this.

**Without a plan prepared by the Parish Council with your input we would have to rely upon either:**

- Developers putting forward their own proposals to meet and potentially continue to exceed the Core Strategy housing targets; or
- Waiting until Herefordshire Council prepares and forces upon us a plan for the villages where development has been stipulated as being required.

The Local Steering Group has tried hard to accommodate your feedback from the questionnaire, meeting the housing target set for Clifford Parish by Herefordshire Council in a way that addresses the wishes and concerns of our community.

**Currently the draft plan proposes:**

- Defining Settlement Boundaries for Clifford and Priory Wood.
- Three housing sites in Clifford which satisfy the required housing target and also provide for environmental improvement.
- A number of other policies reflecting concerns expressed by the community, including preservation of the landscape and views.

**You are invited to comment on the Plan**, which can be viewed online under 'Neighbourhood Plan' at: <https://cliffordparishcouncil.co.uk/clifford-neighbourhood-plan/>

Hard copies are available for inspection at **Hay-on-Wye Library** - please call Powys Library Services on 01597 827 460 to arrange a reading session.

You can also borrow a copy by telephoning either...

**Mark Hope-Jones** 01497 831 378 (Priory Wood); or

**Egbert Smit** 01497 831 364 (Westbrook).

Representations may be posted or hand-delivered to...

**Emma Noble**, Clifford Parish Clerk, at 20 Manor Fields, Burghill, Hereford HR4 7RR, or scanned and emailed to: [clerk@cliffordparishcouncil.co.uk](mailto:clerk@cliffordparishcouncil.co.uk)

**All comments must be received by midnight at the end of Tuesday  
8<sup>th</sup> December 2020**

**Leaflet circulated to all households in the Parish**

20	8 <sup>th</sup> December 2020	Regulation 14 consultation period ends
	Regulation 14 Consultation end date	Representations were received from 5 members of the community along with those from 8 stakeholder organisations.
21	27 <sup>th</sup> April 2021	Parish Council considered the advice of the Steering Group upon representations and changes required in order to produce the Submission Draft Plan – see Section 3 below.
	Parish Council	<p>A list of alterations can be found at Section 4 below.</p> <p>The Parish Council approved the submission of the NDP with the amendments indicated to Herefordshire Council under Regulation 15 of the Neighbourhood Planning Regulations.</p>
22	14 <sup>th</sup> October 2021	Agreed to revise policy CNP5 following advice from Herefordshire Council about the possibility that the River Wye SAC may fail to achieve its conservation status during the plan period, a factor that was highlighted in an initial review of the SEA and HRA. The changes involved adding the following paragraph to the end of Policy CNP5:
	Parish Council	<p><b><i>‘Development proposals must, in particular, demonstrate that they will not have a significant adverse effect on the River Wye Special Area of Conservation and species of European importance. In the event that the integrity of the Upper River Wye catchment is found to be failing to meet its favourable conservation status, planning permission will only be granted where it is shown the proposal will not increase nutrient inputs into the SAC. This could include through the delivery of mitigation to make a proposal nutrient neutral.’</i></b></p> <p>In addition, the following statement was added at the end of paragraph 5.8</p> <p><i>‘The River Wye SAC is monitored at regular intervals to inform its status and trends in terms of its habitat and associated species for which the site is protected. This is to ensure that its primary management objective of achieving Favourable Conservation Status is met. Parts of the wider catchment are of such concern that restrictions have been placed on new development. Although the Upper Wye sub-catchment, within which Clifford Parish sits, is not currently in that position, a</i></p>

		<p><i>precautionary approach has been taken to ensure the longer-term potential of the NDP's policies. Proposals have been put forward to cover the eventuality of the sub-catchment finding itself in a similar position in the future.'</i></p>
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**Section 3**

**Clifford Neighbourhood Development Plan**

**Schedules of Representations in response to Draft Plan and Parish Council  
consideration, April 2021**

# Schedule 1: Community Representations and Parish Council Response

Respondent Identification Number	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Suggested Changes Parish Council Consideration (In blue)	Response to representation
C.1 J N	Paragraph 2.2	Suggests change	There are 53.4 km of paths through the Parish. A number of minor spelling mistakes highlighted. <b>Grateful for the information provided.</b>	See Change No 3 (NB the spelling mistakes have also been corrected)
C.2 T T	Page 9	Suggest change	Why are the various commons not listed either in footnotes nor in the Appendix 1? All very well listing privately owned bits and pieces, what about what others can access? <b>Technically, common land per se is not considered an environmental designation for planning purposes and land ownership is also not a consideration for such designations. Commons, and their use, are covered by other legislation, of which the Commons Act 2006 is one of the most recent, enabling these areas to be managed more sustainably. Some commons are subject to environmental designations because of their particular characteristics, i.e. some may also be Special Wildlife Sites. It is understood that the freedom to roam freely over registered commons was introduced under the Countryside and Rights of Way Act 2000, although they would not be considered Public Open Space. Notwithstanding the above, they may be considered local heritage assets that make a positive contribution to local character and sense of place. A list of these together with a description of the contribution they make has been provided by the Parish's Open Spaces representative. This has been included in the NDP's Appendix 1.</b>	See Change Nos 4 and 18
	Policy CNP2	Comment	Much is said in the introduction about how much residents value the local landscape and its relatively undeveloped nature, the environment and nature, but this policy says nothing about how that will be protected in the approach to accommodating business needs. There could be no end of proposed agricultural developments or changes in practice which serve to destroy important ecological and biodiverse assets, for example traditional standard orchards, woodland along old railway alignments, yet nothing in the strategy exists to protect specific parts of the landscape under specific pressure. Where new buildings and developments are mentioned all that is required is that they are of a suitable scale and design. What they replace, if not an existing building or brownfield site, is not specified. <b>The NDP does seek to ensure proposed development involving business uses, including for agriculture, is undertaken sympathetically and away from sensitive locations. In this regard it should be noted that the NDP should be read as a whole and not on the basis of any individual policy. There are policy requirements covering the matters identified in this representation, insofar as it is possible to do so. This policy sets out the approach to where most forms of development expected within the Parish should be directed. Site specific and detailed issues are covered by other policies in the NDP. NDP policies in section 5 cover most of the environmental matters against which proposals for business, and other forms of development, should be considered. There are also a number of policies in section 7 covering specific forms of agricultural development that require wider considerations than might be covered by more general landscape,</b>	No change proposed as a consequence of this representation



Respondent Identification Number	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Suggested Changes Parish Council Consideration (In blue)	Response to representation
			<p><b>biodiversity and heritage requirements. The NDP can only cover ‘development’ or ‘change of use’ in the terms set out in the Planning Acts. It cannot cover changes in agricultural practice. These may be covered by other regulations outside of the NDP’s scope.</b></p>	
	Policy CNP6	Suggests change	<p>Much is made about the ‘protection’ of heritage assets, but the definition of heritage asset seems to be listed buildings (isn’t there legislation protecting those anyway?) yet there seems to be no mechanism, support for, or indication of the desire to see other heritage assets such as the old railway alignments and their trees, or indeed significant trees in the landscape, protected. Could there not be a clause suggesting other heritage assets may be protected, by additional actions even such as tree protection orders in the case of trees. An obvious case in point is the recent wanton destruction of well over a hectare of woodland along the old LMS railway alignment just southwest of the old Whitney rail bridge crossing. Such a woodland would have been fantastic habitat for myriad creatures other than Holsteins, and a carbon sink worth at least 400tonnes per annum has been lost. Apparently, the forestry commission (was Clifford PC asked?) gave it their blessing, but to me it’s an obvious scar on the landscape and is very noticeable. It also does little to help flood management and taken with the other tragic recent arboreal losses in that part of the parish has really contributed to the creeping industrialization of the agricultural heritage landscape we apparently so cherish.</p> <p><b>It is recognised that there are other legislative provisions that protect certain matters relating to Listed Buildings and Scheduled Ancient Monuments although not necessarily all aspects. Some developments require planning permission, including that which might affect the settings of heritage assets. The protection of local heritage assets is covered by Policy CNP6 d). Many local assets can be identified by their presence in this Historic Environment Record. Any additional assets might usefully be identified through local surveys and this together with supporting information can be forwarded to include in that Record. Paragraph 5.9 directs the reader to the Record. An alternative is for the local community to identify such assets and advise Herefordshire Council (through the Parish Council) that it has a local list. They might be listed in any review of the NDP within Appendix 1. The protection of trees and woodland from the effects of development is covered by policies CNP3 and CNP5. Appendix 1 lists Ancient Woodlands together with areas designated Special Wildlife Sites that comprise woodlands (NB there will be some overlap between these). The Forestry Commission is responsible for granting Felling Licences although it is understood that there are consultation arrangements within this process.</b></p>	No change proposed as a consequence of this representation
	Policy CNP14	Comment	<p>I think it would be good to protect what few traditional farm orchards and other typical non-building parts of what might be considered a traditional farmstead that there still are around the parish, when considering the impacts of new developments. In the last 50 years the UK has lost 95% of its wildlife rich traditional orchards, and those that are left are almost all neglected and used just for grazing. Herefordshire was once renowned for them. I am biased as a cidemaker but there is a lot of culture and tradition wrapped up in the land around the buildings just as much as there is in the old buildings. (f) could be modified to include a presumption that the erection of the new development/building does not directly displace a valuable natural asset, such as a traditional farmhouse orchard or kitchen garden.</p> <p><b>The loss of orchards, especially traditional forms, together with important habitats is always unfortunate. However, as indicated above, the NDP can only protect such assets from development that would result in their loss. In this regard, traditional orchards is understood to be an important Herefordshire Biodiversity Action Plan habitat and policy CNP5 is relevant (see <a href="https://herefordshirewildlifelink.wordpress.com/biodiversity-action-plan/">https://herefordshirewildlifelink.wordpress.com/biodiversity-action-plan/</a> ). It is not possible to protect</b></p>	No change proposed as a consequence of this representation

Respondent Identification Number	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Suggested Changes Parish Council Consideration (In blue)	Response to representation
	Policy CNP18	Suggest change	<p><b>kitchen gardens through the NDP, although heritage assets such as ‘walled gardens’ may have a degree of protection where they form part of registered or unregistered parks and gardens (see Policy CNP6 and Appendix 1).</b></p> <p>This policy means well but is not strict enough. Phosphate emissions from ALL intensive livestock proposals, especially poultry, should be explicitly considered by the policy and rigorous calculations must be performed mandatorily to ensure that the proposed spreading rate, frequency and area is sufficient so as to not give rise to additional phosphate run off from the land. As the Plan acknowledges, the Wye SAC which the entire parish drains into and is part of, is not in a favourable condition and monitoring performed recently on the Hardwicke Brook has shown phosphate pollution levels consistently in breach of the safe limits, by at least a factor of four. Adding to the problem, poultry litter has typically twice as much to four times the amount of available phosphorus per tonne, as other farmyard manures from cattle, pigs, sheep etc. See Defra Fertiliser manual pages 62 – 65. Pigs/cattle/sheep 1.9 – 3.6 kg/tonne whereas layers and broilers have 8.4 to 15 kg/tonne phosphates in their manure. Spreading poultry manure can quickly overload land even with a relatively low phosphate index. This policy needs tightening. Also, I’m curious to know how many HGV slurry tankers a day need to pass through Clifford village before their passage is considered unsafely accommodated, see para (b)? Also reference the second clause in (d), who is responsible for enforcing the appropriate measures that livestock unit proposals will have to put in place to protect the environment. The parish council? How effective will that enforcement be?</p> <p><b>The policy can only cover those matters that are material to a planning application and not those covered by other regulations. The approach used in the NDP has been informed by an investigation of similar policies that have been considered to meet the ‘Basic Condition’ required by the Neighbourhood Planning Regulations. It is understood that only when the ‘litter’ or ‘manure’ amounts to waste, it becomes a material consideration in relation to a planning application. Spreading in accordance with good agricultural practice or a relevant licence would not generally constitute waste in that regard. The policy proposed has been tested at Examination in other NDPs and measures to seek stronger controls have been deleted. Any decision about the capacity of the highway to accommodate this and other forms of development will be informed by highway specialists. Herefordshire Council, as local planning authority, is responsible for decisions on planning applications, which should normally be in accordance with the development plan of which the NDP will form part, and for any enforcement.</b></p>	No change proposed as a consequence of this representation
	Policy CNP22	Comment	<p>Apologies I am a relatively new resident and did not get the chance to participate in the original surveys in 2017/8 but has any thought been given to returning the old railway alignments into already segregated cycle paths? Already flat(ish), already traffic free, and already there, built by imported irish labour. It just needs a great deal of campaigning, persuasion, money and about 20 years. I can tell you from experience the worse thing about cycling to Hay is sharing the road with others going past at 60mph. In and around the village is generally fine, but higher speeds are reached on the open road. It is still safe to cycle on the road around here though. Well, safer than I was cycling around the A438 in Letton, where we lived before!</p> <p><b>New Public Rights of Way are designated under the Highways Act, although an NDP can include policies to ‘provide for high quality walking and cycling networks and supporting facilities such as cycle parking’ [NPPF paragraph 104(d)].</b></p>	No change proposed as a consequence of this representation

Respondent Identification Number	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Suggested Changes Parish Council Consideration (In blue)	Response to representation
			<b>Creating such a path would be a very worthwhile project that would have benefits for locals and visitors. Unfortunately, it is considered unlikely that the resources will be available to deliver such a project through the NDP and during its current plan period. It is noted that Clifford Tramway is included on Herefordshire's Historic Environment Record (SMR Number: 21686). In this regard policy CNP6(d) would be relevant.</b>	
	Whole Plan	Comment	<p>The plan comes across as very against residential development, unless it's in but a handful of tiny areas, which I understand for a number of reasons, however this business of only 30 homes being desirable is extremely frustrating. There is an acute shortage of housing in the UK. Successive governments have, since 1983, relied on market forces to provide new housing, which has led to a sharp increase in demand for affordable housing for the younger generation. Of course, when demand outstrips supply the price rises and I only just got onto the housing ladder by the skin of my teeth in 2006. I would have to pay a lot more now if I was starting out! There should be a strong presumption to providing new affordable housing whether local or not, to the generation born after 1983's policy introduction of selling off council housing and not replacing. When I compare housing availability here to other parts of the EU where I have lived I am consistently surprised by the severe lack here. It's a disservice to the next generation and as the climate emergency forces us to live more locally and rapidly decarbonise agriculture, more young landworkers will inevitably be needed, especially in a parish as large as Clifford. The ambition to keep them out until 2031 is surprisingly vindictive, to my mind. Also, the proximity to a local market town makes Clifford particularly attractive as a place to develop to absorb rising population, and really genuinely enable cycling rather than car use, as low carbon alternatives for the future.</p> <p><b>In preparing the housing policies for the NDP, the need for compromise between the conflicting views of residents, resisting and promoting further homes was recognised. The approach taken was a positive one although recognises that there is a high demand for properties; the scale of development is important and small sites would fit most sensitively into the landscape and settings of the villages; however, small sites result in large dwellings that are unaffordable by many local people and developers would not need to provide an element of affordable housing because they would build 10 or less dwellings on such sites. As a consequence, the plan promotes community-led housing developments (Policy CNP11) in addition to the sites allocated to meet the required level of proportional housing growth. Currently the NDP anticipates the provision of 25% more dwellings within the Parish than is set by the Core Strategy. Any community-led housing scheme providing affordable housing would be in addition to this. Where there is a need for agricultural dwellings, these will be considered under Core Strategy policy RA3/RA4.</b></p>	No change proposed as a consequence of this representation
	Paragraph 2.7	Suggests change	Add 'and 5 commons' <b>Helpful advice.</b>	See Change No 4
	Picture 2	Suggests change	Should the view be 'looking westward' not eastward? <b>This photograph is understood to be from the western edge of the Parish close to Clifford Castle. Its purpose is to show that the Black Mountains, although outside of the Parish, are a dominant landscape feature that is visible across the Parish contributing to its special qualities and character. To a large extent its direction is not material given the extensive number of views that this represents.</b>	See Change No 5
		Question	Why at least 30 dwellings when 76% of residents consider that there should be less.	

Respondent Identification Number	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Suggested Changes Parish Council Consideration (In blue)	Response to representation
	Policy CNP1 b)		<b>The NDP must comply with National planning Policy Guidance and Herefordshire Local Plan Core Strategy. For the first, it must plan 'positively'. Herefordshire Local Plan Core Strategy requires a minimum of 30 dwellings to be planned for. It is not possible to plan or less. In addition, it needs to be recognised that you cannot specify an exact number for any site. Any reference in a policy specifying a maximum number of houses will be removed by the NDP Examiner.</b>	No change proposed as a consequence of this representation
	Paragraph 4.6 and elsewhere	Comment	It is not just HGVs that are a problem on small roads. There are many others including those with trailers which cause hold-ups and damage. <b>This is raised as an issue highlighted through community consultation. It is accepted that there are, of course, other vehicles that use local roads and can cause damage, although it is the larger ones that have the most adverse effects.</b>	No change proposed as a consequence of this representation
	CNP7 (2)	Suggests change	Should read 'pastures and orchards' and not 'paddocks'. <b>Helpful advice. However, further assessment of sites originally proposed as local green space has concluded that the area described may not meet the requirements of the NPPF paragraph 100. Other appropriate protections are in place.</b>	See Changes Nos 10, 11 and 12
	Whole Plan	Suggests change	A well-prepared document. However, it lacks sufficient detail about the Parish's rich heritage of open spaces including commons, village greens and land with no known owners, significantly Bake Lane. I believe that details about the Parish's Open Spaces need further amplification. For instance, although not mentioned in the Plan, there are 5 areas of registered common land in the Parish, all with unique characteristics. One of them, Priory Wood Common, comprises over 20 separate plots of land. There are also other plots of non-registered land which have no known owner and which are accessed by the public (Bake Lane being the most significant). These are all precious assets of the Parish which in my view should be referred to in the Plan in the same way as are listed buildings, noteworthy views, etc. As the Parish Council's Open Spaces representative, I am happy to provide you with a consolidated input about these Open Spaces with accompanying maps and, where applicable, the regulations relating to them by mid-January. <b>Technically, common land per se is not considered an environmental designation for planning purposes and land ownership is also not a consideration for such designations. Commons, and their use, are covered by other legislation, of which the Commons Act 2006 is one of the most recent, enabling these areas to be managed more sustainably. Some commons are subject to environmental designations because of their particular characteristics, i.e. some may also be Special Wildlife Sites. It is understood that the freedom to roam freely over registered commons was introduced under the Countryside and Rights of Way Act 2000, although they would normally remain in private ownership (albeit some may be owned or controlled by a local authority. Notwithstanding the above, they may be considered local heritage assets that make a positive contribution to local character and sense of place. Open Space can be identified within the NDP where this is in public ownership, such as community parks, play areas or amenity open space, or where such land comprises a community facility, such as a playing field. A list of these together with a description of the contribution they make to the Parish would be welcomed to be included, as appropriate, in the NDP's Appendix 1.</b>  <b>Designation as Local Green Space may be an alternative, provided it meets the provisions of NPPF paragraph 100. This is the approach that has been taken in the NDP and information presented upon the assessments at:</b> <a href="https://cliffordparishcouncil.co.uk/wp-content/uploads/2020/03/Report-on-Local-Green-Space-Site-Assessments.pdf">https://cliffordparishcouncil.co.uk/wp-content/uploads/2020/03/Report-on-Local-Green-Space-Site-Assessments.pdf</a>	See Change No 18

Respondent Identification Number	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Suggested Changes Parish Council Consideration (In blue)	Response to representation
C.4 C S and K A	Whole Plan	Comment	<p>Our two main priorities in what we do here have always been to provide a means of becoming fairly self-sufficient for our food and other needs and just as importantly to provide a habitat and refuge for wildlife. We have had to make compromises to both these ambitions by showing consideration to our neighbours, especially those on the northern side of our property by not planting huge trees directly in front of them and by cutting back the hedge along the road each year. Large trees and overgrown “wild” hedges are great for wildlife. It would be hurtful to us to believe that our neighbours are thanking us for the consideration we have shown them by placing unreasonable restrictions upon us.</p> <p><b>The work undertaken to sustain and enhance biodiversity is welcome and to be commended. The NDP supports such measures through policy CNP5. The intention of the NDP is to guide development so that the important qualities and character of the Parish and its settlements are retained.</b></p>	No change proposed as a consequence of this representation
	Policy CNP4	Objection	<p>The viewpoint over our field through our gateway on the southerly road of Priory Wood is no more special than countless other views all over Priory Wood. With the trees we have planted inside the gate growing, the view will soon become more and more restricted. It is a wonder to us why this view has been chosen by the NDP team as being so special. Could it be that perhaps it is really the view over our field from the north side of this field that they find special and worth protecting?</p> <p><b>A range of views are identified along the southerly road of Priory Wood and protected through Policy CNP4, some of them through gaps between existing properties. These views highlight the importance of the low density of development within the central core, the amenity value of Malthouse Common, and the connection of the village core to its wider rural landscape. The route from which these views are visible forms part of the Wye Valley Walk. The opening and closing of gaps reveal an important sequence of views along this walk. However, it is recognised that the view through this gate is more restricted than the more extensive openings to the east and west. It would be better to indicate the start and finish points of the sequence upon Map 2.1 with the eastern end being the panoramic across Malthouse Common and the western end being the view across Priory Wood Cottage Pastures and Orchards.</b></p>	
	Policy CNP7	Objection	<p>Not content with restricting development here at Oak Cottage, by having us classed as “Open Countryside”, the plan also proposes to place further restrictions upon us by having most of our property labelled “Local Green Space”. Why the need for this extra restriction? It feels unreasonable. The choices we have made to make our field a green and beautiful place have been our choices. While we are delighted that other people might also appreciate the way things are here, we would not thank them for showing their appreciation by forcing us to always keep things this way. What some might see as protection, we would see as restriction. Placing this “Local Green Space” designation on what is already classed as “Open Countryside” we would feel is an infringement.</p> <p><b>Consultation with the owner of Oak Cottage about the designation was conducted in good faith, and it was hoped that it would be seen as positive appreciation of the environmental efforts in relation to this land. Given the new concerns here expressed, the proposal should be removed. The need to retain the character of this part of the settlement, however, remains an objective to be pursued through the defining of the settlement boundary.</b></p> <p><b>In the light of representations made about this policy, the sites with no public access proposed as Local Green Space were all reviewed. Although the designation of Local Green Space can include private land special to the local</b></p>	See Changes Nos 10, 11, 12, 13 and 17

Respondent Identification Number	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Suggested Changes Parish Council Consideration (In blue)	Response to representation
			community, having reviewed the representation and concerns subsequently received, it was considered that the designation of the three areas of private land may not be necessary to maintain the character of Priory Wood or to protect the setting of Clifford Castle in view of other provisions in the plan. In addition, it is understood that the criteria for such designations require a high level of community value which may not be discernible in these three instances.	
	Policy CNP8	Objection	While we understand the reason for having the “settlement area” for Priory Wood primarily along the Northern Road of Priory Wood, we are not happy that this “settlement area” should then wrap around our property to the south to include Cheyney Cottage and Beech Hill. This effectively makes us a small parcel of “countryside surrounded on three sides by potential future development. Both Cheyney Cottage and Beech Hill have as much of a rural feel to them as the properties that make up the central belt of Priory Wood and both have scope for development. This seems unfair to us. We would be happy if the “settlement area” stopped at Priory Hall.  The settlement boundary for Priory Wood has been defined following an assessment of its particular character or ‘place’. This is described in NDP paragraph 6.6. The central core or triangle is an important element within its character and further dwellings utilising residential forms within it would erode its special qualities.	No change proposed as a consequence of this representation
C.5 J E	Section 6: Housing	Comment	The level of proportional housing growth required by the Core Strategy has already been met through permissions granted, notwithstanding any windfall allowance.  The Core Strategy Planning Inspector made it clear that the required level of proportional housing growth was a minimum. No maximum level of growth for any settlement is indicated. Consequently, unless a Neighbourhood Plan defines where new housing development should take place within the context of Core Strategy policy RA2, then the wider provisions of that policy will apply to any of the named settlements. Furthermore, unless and until Herefordshire Council is able to show it can provide a 5-year supply of housing land (which currently it does not) then the NPPF provisions of development only needing to be in a sustainable location applies unless the provisions of NPPF paragraph 14 (relating to neighbourhood plans) applies. To have an up-to-date neighbourhood plan provides some safeguards against the adverse effects of housing development.	No change proposed as a consequence of this representation
	Section 6: Housing	Comment	The majority view of the community is that the target should be 30 dwellings or less believing development greater than this would change the landscape and rural character of the Parish.  The figure of 30 is not a target but a minimum requirement. One of the provisions of NPPF paragraph 14 is that a Neighbourhood Plan contains housing policies and allocations. In order to have an adopted Neighbourhood Plan, certain basic conditions need to be met, and compliance with some provisions of the NPPF is one. There is a requirement to plan positively.	No change proposed as a consequence of this representation
	Section 6: Housing	Comment	If restricting housing development to the minimum number required is not practically possible, then why consult?  A number of consultations have been undertaken during the preparation of the draft plan and these have covered a range of issues covered in the document and for which policies have been drafted. During the process of preparing the plan, Government policy and case law has altered the approach that must be taken. These have been taken on board. Not to prepare a Neighbourhood Plan would mean that decisions on planning applications would be made in accordance with the general policy set out in the Core Strategy or the NPPF according to the specific circumstances with much reduced input. Consultations have raised a number of issues which have required some compromises. The plan	No change proposed as a consequence of this representation

Respondent Identification Number	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Suggested Changes Parish Council Consideration (In blue)	Response to representation
			<p><b>put forward is considered the best fit to meet the aspirations of the community within the parameters set by Core strategy and national policies.</b></p>	
	Section 6: Housing	Question	<p>It is not clear from the Plan's text whether the term 'growth' used when stating 'The proposed developments are larger than the community's expressed wishes but meets the Government's requirement that NDPs should plan positively for growth' refers to new housing 'up to' the designated target of 30 dwellings or growth' in excess' of the growth target i.e. an unlimited amount of development.</p> <p><b>The reference to 'growth' is used within the context of advice contained within the National Planning Policy Guidance.</b></p>	No change proposed as a consequence of this representation
	Section 6: Housing; Policy CNP10; paragraph 6.8; Appendix 3	Objection	<p>The process of Site Assessment used to promote Land North of Lower Court Farm (both sites 3 and 4) to the top of the table of potential sites appears flawed and should be discarded. The analysis and methodology provide a falsely rigorous case for the comparison of these sites. Both Lower Court sites 'topped' the league table by scoring 4 points for site 3 and 3 points for site 4 vs 1 point for the next nearest site being site 2.</p> <ol style="list-style-type: none"> <li>1. Why should site 3 be the only site to get a point for the criteria 3 that the development 'Fits sensitively into settlement'? The Report already acknowledged undocumented 'environmental concerns' and notes that at best it 'should be possible' for a small housing estate 'to enhance the setting of the old house'. This is a very qualified recommendation. The whole notion that this criteria can be scored (and to the benefit of site 3 alone) without having any plan, design or scheme in mind is absurd. Why should a Booker's End style development sat next to a Grade 2 listed farmhouse and opposite the Castle vs. entirely inoffensive farm buildings be deemed to be 'environmentally sensitive' when none of the other sites (which are far less problematic in terms of size) be given no score? To say that a skyline of modern house roofs would improve the view of the Castle from Ton Wood is, to be polite 'speculative'. Please provide a detailed justification for crediting site 3 alone with a positive score.</li> <li>2. Why should sites 3 and 4 gain a point each from criteria 18 'Effect on Public Right of Way'. The Analysis states that these sites score a point each for not affecting or damaging a public right of way. The other two sites have no rights of way to affect or damage but they get no points! The truth is that none of the 4 schemes damage rights of way but only the two adjacent schemes 3 and 4 within the newly drawn boundary get credit. If the 4 sites were merely being tabulated and their various criteria judged i.e. 3 and 4 have adjacent paths which are not a problem, 1 and 2 have no public footpaths so the matter doesn't arise, then there would be a <i>table</i>, but this is presented as a <i>league</i>. The report states that 'an independent planning consultant was asked to use these criteria <i>in order to rank the sites according to which might be most suitable</i>'. To credit two sites over the others in a league by this means seems questionable/illogical. Please provide some explanation for this and make available on the Parish website details of the independent planning consultant that was hired by the Parish and the consultant's report.</li> <li>3. Criteria 21 is called 'Preference for small sites'. Sites 1, 2 and 3 get no points (although site 2 which currently has permission for 2 houses but with the CNP proposing 4-6 doesn't get a tick because it is 'not small site within the</li> </ol>	No change proposed as a consequence of this representation

Respondent Identification Number	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Suggested Changes Parish Council Consideration (In blue)	Response to representation
			<p>context set by the community' (no explanation of this offered). Site 4 being part of the Lower Court Farm does however get a tick on the basis Development of a site of this size <i>would</i> meet the community's expressed preference. However, in the same report it is clearly stated that it is considered that 'site 4 ought not to be developed unless accompanied by development of site 3. This is in order to protect residential amenity.' Therefore site 4 gains one of its 3 points simply for being small but is according to the Report unusable on its own <i>despite</i> meeting the communities expressed preference in term of development on a modest scale. Again please explain how this methodology leads to any sort of plausible ranking, supposedly by merit.</p> <p>Any ideas of one site's superiority to another's should be suspended if based on the Site Assessment Analysis until there are answers to the above questions and a better understanding about the methodology used.</p> <p>Planning Practice Guidance (Paragraph: 003 Reference ID: 3-003-20190722) indicates that any (site) assessment needs to be proportionate to the nature of the plan. The site assessment process followed guidance issued by Herefordshire Council in its Neighbourhood Planning Guidance Note 21 which identifies that there may be major criteria that might rule a site out and other criteria that might be used to judge between sites. In relation to 'major criteria' one site was considered to conflict with key Core Strategy provisions (Site 1) although a reduced site area would mitigate the effects sufficiently for it to provide a suitable site for development. In relation to 'other criteria' the approach considered 'proportionate' was to determine 'best fit' should it be necessary to judge between sites. On this basis the assessments were in terms of relative differences between the four sites.</p> <p>In relation to each site and for each criterion chosen, a negative/neutral/positive weighting approach was used with a double negative where a site was considered to have a significantly adverse effect on any criterion (see housing site assessment report paragraph 3.2). This approach was considered reasonable and proportionate given the sites submitted. No points were attributed as suggested in the representation although the attributes of all 10 criteria were used to rank sites with those having least negatives/most positives ranked highest.</p> <p>The sites were assessed by a professional planner with experience in how sites might be developed with an explanation provided for the assessment results in each criterion.</p> <p>In relation to criterion 3, surrounding development was taken into account where it forms the existing character of the settlement at that point. The use of Heritage Impact Assessments is a accepted approach to informing how development should proceed in such locations.</p> <p>In relation to criterion 18, sites 3 and 4 directly adjoin a public footpath, which is a benefit, whereas the other two sites do not. This is considered an appropriate way to distinguish between the relative suitability of sites.</p>	



Respondent Identification Number	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Suggested Changes Parish Council Consideration (In blue)	Response to representation
			<p>In relation to criterion 21, the community's aspiration was for sites of 3 or less dwellings. Site 2, when assessed, had no planning permission and still retains the potential for 4 dwellings as originally suggested despite that permission; site 3 has a negative assessment under this criterion; although it is considered site 4 may not be capable of development unless site 3 is developed because of the effect on residential amenity, this factor is considered under criterion 7. To take it into account under criterion 21 would be double counting.</p> <p>The approach used is considered proportionate given the sites available.</p>	
	Section 6: Housing; Policy CNP10; paragraph 6.8; Appendix 3	Objection and Comment	<p>Key Questions Regarding the Inclusion of the Land Part of Lower Court Farm in the Draft Clifford Neighbourhood Plan</p> <p>It is part of the Parish Plan's role is to scope for sites of potential development, if this is demanded by higher planning bodies, requested by local people or to satisfy specific interests i.e. local employment, homes for local people on local incomes, the old etc. I don't believe it is the Parish Plan's role to sponsor commercial developments which do not come near to meeting aforementioned duties.</p> <ol style="list-style-type: none"> <li>1. Is the proposed development/housing estate of 12 – 15 houses necessary to meet the Herefordshire planning target of 30 homes by 2031?</li> <li>2. Does the proposed development/housing estate of 12 – 15 houses reflect Clifford's residents stated wish for the number of new housing?</li> <li>3. Does the proposed development/housing estate of 12 – 15 houses meet Clifford's residents very strongly stated desire for more affordable housing of a type that would be accessible to local people and their children?</li> <li>4. If 'so called' affordable housing has been ruled out of this development what is the envisaged pricing of the houses to be built in this scheme?</li> <li>5. If it can be assumed that increasing housing numbers will be required nationally and locally for the foreseeable future would it be sensible (or not), having more than met the short term quota of 30 to hold back on development until such time as national and local planning officials return with demands for further housing development?</li> <li>6. The principal reason given for developing sites 3 and 4 is that the housing will benefit the village environment, compared with the existing agricultural buildings which are deemed as being unsightly. In order for this reason to have any substance can the Neighbourhood Plan give significant detail as to what is being envisaged. For example, if a Bookers End style scheme is envisaged and how exactly does this enhance the village environment? What is the evidence that there is a body of opinion (other than those keen on the development) that finds the farm buildings unsightly? It might be thought that if you find farm buildings in the countryside unsightly then perhaps Herefordshire is not the place for you? A mention was made about the potential loss of mature trees (Site 4), how</li> </ol>	No change proposed as a consequence of this representation

Respondent Identification Number	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Suggested Changes Parish Council Consideration (In blue)	Response to representation
			<p>does this square with the environmental claims. There are many more potential questions around the commercial development of this site. It would appear that there has been contact by members of the Plan committee with site landowners. Can those promoting this small housing estate please disclose in <u>far greater detail</u> what they have in mind before there is any thought of approval in principal? Objectively, it must be said that a great scheme of attractive housing could ‘in theory’ be better than weathered ‘site appropriate’ farm buildings i.e. stone and wood per the farm attached but a fairly standard close of near identical ‘executive’ houses using wholly inappropriate brick would be simply worse and any ‘crystal ball’ case for environmental gain completely false.</p> <p>7. A further justification for this development is that ‘it could reduce pressure for development in more sensitive areas of the Parish.’ Please provide detail of how this works and if it is true? Is it the case that for example, further applications in Priory Wood will be turned down because of a housing scheme in lower Clifford? Many people might reasonably assume that each application is judged at a local planning level on its own merits within a housing background of continuous and increasing demand? Please comment.</p> <p>8. If however there <i>is</i> a tangible relationship between development in one area of the Parish stopping development in another area (i.e. the Plan’s claim of one large new site removing development pressures at another’s is credible) then by using all the potential development sites in lower Clifford in the short/medium term (and substantially exceeding the development goal of 30 houses) does this not <i>bring forward</i> pressure elsewhere? Can the Parish Plan honestly claim that the higher planning authorities will give any long term credit for a scheme once it is actioned and built? By withholding support for the development of Lower Court until post 2031/ as long as possible, would the Parish Plan not be taking into account the medium and long term interests of Clifford as a whole or at least not be a partner to damaging them? Please comment.</p> <p>9. There is little mention of the non-environmental impact of developing both sites at Lower Court. In respect of this proposed development can the Plan please comment on:</p> <ol style="list-style-type: none"> <li>a. The current population of Clifford village (within the redrawn boundary) and the assumed increase from the development. Would an estimate of say a 50% increase be reasonable? (The scheme nearly doubles the housing but may provide larger houses to a somewhat younger cohort).</li> <li>b. Do those promoting this development envisage family houses? Are there impacts on road usage say to and from Clifford’s school? Road safety and usage were key concerns of the parish feedback so some comment is appropriate.</li> </ol> <p>10. In addition to the three specific questions in the Site Assessment Analysis and Methodology please address the following:</p>	

Respondent Identification Number	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Suggested Changes Parish Council Consideration (In blue)	Response to representation
			<p>a. In order to validate the independence and objectivity of the Site Assessment Analysis and Methodology please provide details the independent planning consultant used. Who commissioned and paid for this consultant and what was the brief?</p> <p>b. Please provide the consultant’s report on the Parish Council website. Also for the sake of good order please confirm that, having promoted Lower Court on an quasi-objective methodology (albeit with subjective claims about the environmental benefits of a scheme about which no details of size, style or appearance are known) as being the most suitable site for development, they would play no part in any future development of the site.</p> <p>It would seem that whilst Lower Court may or may not be a suitable site for development there should be robust answers to the above questions and a stronger case made both for the siting of a large (for Clifford) housing development at this location at a time of continued housing growth across the parish. Regardless of the merits or otherwise of a small housing estate and having satisfied Herefordshire’s Planning targets for an (unknown) period, might it not be wise to consider the majority of parishioners wishes (limited rather than unlimited development, pro-affordable housing and anti-housing estate) and hold back on supporting the development of a site, by a commercial scheme of non-affordable housing, until the next round of planning targets appear, as they most surely will? It would appear that the appetite for rural development is growing and unquenchable, giving the greenlight to developments in excess of any required quota might be categorised as an own goal?</p> <p><i>PS It might be noted that in the short time between drafting the above questions and sending them one further planning permission has been granted for a new house and workspace in lower Clifford being Land at Castle House P203887/F. Growth in the Parish based on sensitive infill is on-going, so both the draft Parish Plan and the Housing Assessment Report (which is in any case in need of reworking if the above questions are valid) should be amended to reflect the current figures. Clearly development is a moving target but any support for what would be a major development for Clifford should be based on accurate figures since the key plank of promoting Lower Court Farm is an immediate need to meet Herefordshire Local Plan Core Strategy and not commercial development for its own sake.</i></p> <p><b>1/2. The proportional housing growth requirement is a minimum. The NDP must approach the preparation of the plan ‘positively’. Given the submission for inclusion in the plan of the Court Farm Site, it was required to be assessed and considered. Its development is considered to have potential benefits if approached in the correct way. The community has the opportunity to determine whether the benefits of allocating the site for housing within the NDP process outweigh the disadvantages through the consultation just undertaken, a further consultation upon any amended plan, and a referendum.</b></p> <p><b>3/4. The ability to provide affordable housing is available through allocating a site of sufficient size to require an element of such housing, of which the Court Farm Site is the only potential opportunity, provided this would be supported by a Heritage Impact Assessment. The alternative is through Core Strategy policy H2 or NDP policy CNP11, which requires a landowner to make available land that would not normally receive planning permission for housing.</b></p>	

Respondent Identification Number	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Suggested Changes Parish Council Consideration (In blue)	Response to representation
			<p>Should any proposal not meet the level of development necessary to require an element of affordable housing then, unless the developer is willing to provide affordable housing, the development will be an open market scheme. The site is not advanced on the basis that it will provide affordable housing, but for its potential environmental benefits. Should affordable housing be provided then this would be a further benefit.</p> <p>5/8. The NDP has to comply with the 'Basic Conditions' set out in Regulations at the time it is prepared. Not to prepare an NDP is an option although would mean that planning applications would be determined upon the basis, primarily, that development should be within or adjacent to the settlements' built-up areas. This could include the site at Lower Court Farm and other locations around both Clifford and Priory Wood.</p> <p>6. NDPs would not normally prepare detailed designs for any site but set out policies that would guide their development. The NDP does include policies that would apply to the development of the site and these are identified in NDP paragraph 6.13 iii).</p> <p>7. The sensitivity of the landscape within which Clifford village sits is described in various places throughout the NDP where this is most appropriate including section 2 and, most particularly, section 5. The sensitivity of the western side of the village, which includes Clifford Castle, is highlighted in paragraph 6.9.</p> <p>9. Population estimates for villages are not produced. The most recent population estimate for the parish is for 2011 when it was 511, having reduced from 530 in 2001. No up-to-date population information is available for the Parish although estimates for the Golden Valley (North) Ward within which it sits suggests a fairly static population with 3057 people living in the ward in 2011 and 3100 in 2019, the latter comprising 1,300 households. On this basis (2.4 people per household), an extra approximate 40 dwellings might accommodate around 96 people (compared to 72 for the minimum growth of 30 dwellings). This would represent around a 19% increase compared to 14%. Herefordshire Council (Rural Housing Background Paper – March 2013) estimates that there were some 41 dwellings in Clifford village. The 19 dwellings indicated in NDP Table 1 represent a growth of 46% although 5 of those had planning permission at the time the plan was prepared and 2 further received planning permission subsequently. However, the increase must be seen within the context of the Parish as a whole, which has around 250 dwellings and the growth resulting from the NDP is estimated to be around 16%. It would be expected that the impact on Clifford Primary School of housing development over and above the minimum level of proportional housing growth would be negligible. Clifford is located upon the B4350 which is easily able to accommodate the level of housing growth proposed.</p> <p>10. The funding used to prepare the NDP was obtained through 'Locality', the Government's agent and was subject to the use of a corporate town planner (Member of the Royal Town Planning Institute) for the assessment work and drafting of the NDP who must follow that body's Code of Conduct. The Parish Council is the 'Qualifying Body' responsible for commissioning work. The Planning Consultant worked with and to the steer provided by a Steering</p>	

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			<p>Group appointed by the Parish Council. It is understood that the Planning Consultant has not undertaken any work for the private sector within the County.</p> <p>The submission of planning application under Code P203887/F is noted, although Herefordshire Council's website does not indicate that it has been determined yet. In any event, such a proposal would be considered an infill site covered by a windfall allowance as set out in NDSP paragraph 6.11.</p>	

## Schedule 2: Organisations Representations and Parish Council Response


Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Comment Parish Council Consideration (in blue)	Response to representation
S.1 Herefordshire Council (Statutory Consultee)	Whole Plan	Comment	It is noted that all the comments made to the pre-consultation draft have been taken on board in the draft version.	No change proposed as a consequence of this representation
			<b>Noted.</b>	
	Policy CNP1	Comment	In general conformity with Herefordshire Local Plan Core Strategy.	No change proposed as a consequence of this representation
			<b>Noted.</b>	
	Policy CNP2	Comment	In general conformity with Herefordshire Local Plan Core Strategy.	No change proposed as a consequence of this representation
			<b>Noted.</b>	
	Policy CNP3	Comment	In general conformity with Herefordshire Local Plan Core Strategy.	No change proposed as a consequence of this representation
			<b>Noted.</b>	
	Policy CNP4	Comment	In general conformity with Herefordshire Local Plan Core Strategy. Valued landscapes and views can be quite a subjective matter. Have the views identified in this policy been evidenced, for instance through resident survey responses?	No change proposed as a consequence of this representation
			<b>Conformity noted. The views were identified by a working group and are presented in detail as Appendix 2 to the NDP for public comment. The need for views to be presented has been identified following planning appeal decisions which highlighted that the landscape was one of transition from the Brecon Beacons National Park to the lowland valley of the River Wye.</b>	
Policy CNP5	Comment	In general conformity with Herefordshire Local Plan Core Strategy. Not a conformity issue but note that the policy criteria does little to supplement its equivalent in the Core Strategy or frame it into a more localised context. If there is not an identified requirement for it, or it is not possible to do this, it can be argued that the issue is already sufficiently covered by the Core Strategy.	See Change No 8	
		<b>Conformity noted. The policy represents the community's aspirations for the environment and adds to Core Strategy policy LD2 by defining natural features that are important within the Parish; referring specifically to features that are included within Herefordshire Biodiversity Action Plan; identifying the need for buffers around sensitive sites, which Herefordshire Council has defined for its urban areas but not those in its rural area; and explaining the need to support corridors and 'stepping' stones which form part of the ecological network yet not referred to in policy LD2. It is noted that Government is proposing a change to the requirement in relation to biodiversity, seeking net gains rather than no net-loss. Hence a change is suggested that will provide for this.</b>		

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Comment Parish Council Consideration (in blue)	Response to representation
	Policy CNP6	Suggests change	General conformity uncertain. Criterion C is slightly at variance with the Core Strategy's LD4 approach. Resisting development that adversely affects heritage assets and their settings should be proportionate to their significance. <b>It is accepted that a change is required in order to comply with NPPF paragraph 184.</b>	See Change No 9
	Policy CNP7	Comment	In general conformity with Herefordshire Local Plan Core Strategy. <b>Noted.</b>	No change proposed as a consequence of this representation
	Policy CNP8	Comment	In general conformity with Herefordshire Local Plan Core Strategy. <b>Noted.</b>	No change proposed as a consequence of this representation
	Policy CNP9	Comment	In general conformity with Herefordshire Local Plan Core Strategy. <b>Noted.</b>	No change proposed as a consequence of this representation
	Policy CNP10	Comment	In general conformity with Herefordshire Local Plan Core Strategy. In relation to the specific sites, comments in relation to potential contaminated land are: Land north of Wellfield Bungalow - Site already has planning permission – therefore no comment Land south of White House - No previous historic potentially contaminative issues Land north of Lower Court Farm - Some farm buildings may be used to store potentially contaminative substances or for the maintenance of vehicles and machinery. Possible unforeseen contamination. <b>General conformity noted. In relation to potentially contaminated land, this would be covered by policy CNP24.</b>	No change proposed as a consequence of this representation
	Policy CNP11	Comment	In general conformity with Herefordshire Local Plan Core Strategy. <b>Noted.</b>	No change proposed as a consequence of this representation
	Policy CNP12	Comment	In general conformity with Herefordshire Local Plan Core Strategy. <b>Noted.</b>	No change proposed as a consequence of this representation
	Policy CNP13	Suggests change	General conformity uncertain. Criterion B- Suggested that “where possible” be added to the end. It may not always be reasonable to expect new businesses to make use of brownfield land. <b>The suggested change that would ensure conformity is accepted. It was not the intention to restrict the development of land for new businesses unnecessarily but to encourage the use of brownfield sites outside of settlements for this purpose.</b>	See Change No 16
	Policy CNP14	Comment	In general conformity with Herefordshire Local Plan Core Strategy. <b>Noted.</b>	No change proposed as a consequence of this representation
	Policy CNP15	Comment	In general conformity with Herefordshire Local Plan Core Strategy.	

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Comment Parish Council Consideration (in blue)	Response to representation
			<b>Noted.</b>	No change proposed as a consequence of this representation
	Policy CNP16	Comment	In general conformity with Herefordshire Local Plan Core Strategy. Not a conformity issue but note that the policy criteria does little to supplement its equivalent in the Core Strategy or frame it into a more localised context. If there is not an identified requirement for it, or it is not possible to do this, it can be argued that the issue is already sufficiently covered by the Core Strategy. <b>Conformity noted. Although it is recognised that the policy duplicates Core Strategy policy E3 to a large extent, there are small variations to cover light pollution and the need for appropriate planning conditions. The first is considered important because the parish borders the Brecon Beacons National Park, which is an International Dark Sky Reserve. In addition, protection of residential amenity should also cover light pollution where this is possible. In both instances the imposition of conditions may therefore be particularly relevant. Its inclusion indicates that this form of work is considered a major contribution to the economic and social wellbeing of the Parish.</b>	No change proposed as a consequence of this representation
	Policy CNP17	Comment	In general conformity with Herefordshire Local Plan Core Strategy. <b>Noted.</b>	No change proposed as a consequence of this representation
	Policy CNP18	Comment	In general conformity with Herefordshire Local Plan Core Strategy. <b>Noted.</b>	No change proposed as a consequence of this representation
	Policy CNP19	Comment	In general conformity with Herefordshire Local Plan Core Strategy. Not a conformity issue but note that the policy criteria does little to supplement its equivalent in the Core Strategy or frame it into a more localised context. If there is not an identified requirement for it, or it is not possible to do this, it can be argued that the issue is already sufficiently covered by the Core Strategy. <b>Conformity noted. Again, it is recognised that the policy duplicates the Core Strategy to a significant extent, in this instance parts of SD1. It does contain a number of additions and the emphasis provided by its inclusion represents the importance of this matter to the local community.</b>	No change proposed as a consequence of this representation
	Policy CNP20	Comment	In general conformity with Herefordshire Local Plan Core Strategy. <b>Noted.</b>	No change proposed as a consequence of this representation
	Policy CNP21	Comment	In general conformity with Herefordshire Local Plan Core Strategy. <b>Noted.</b>	No change proposed as a consequence of this representation
	Policy CNP22	Comment	In general conformity with Herefordshire Local Plan Core Strategy. <b>Noted.</b>	No change proposed as a consequence of this representation



Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Comment Parish Council Consideration (in blue)	Response to representation
	Policy CNP23	Comment	In general conformity with Herefordshire Local Plan Core Strategy. <b>Noted.</b>	No change proposed as a consequence of this representation
	Policy CNP24	Comment	In general conformity with Herefordshire Local Plan Core Strategy. <b>Noted.</b>	
S.2 Welsh Water Dwr Cymru (Statutory Consultee)	Whole plan and policy CNP10	Comment	With regard to the allocated sites, there are no issues anticipated in providing any of them with a supply of clean water – there is a distribution water main in the B4350 which the three sites can connect to. As you indicate, there is no public sewerage available within the Parish Council area. <b>Noted.</b>	No change proposed as a consequence of this representation
S.3 Historic England (Statutory Consultee)	Whole Plan	Support	Historic England has no adverse comments to make upon the draft plan which we feel overall takes a proportionate approach to the main historic environment issues pertaining to Clifford. It is pleased to note that the Plan evidence base is generally well informed by reference to the Herefordshire Historic Environment Record including the Herefordshire Landscape Character Assessment and generally supportive of both the content of the document and the vision and objectives set out in it. <b>Noted with thanks.</b>	No change proposed as a consequence of this representation
	Policy CNP3 and Policy CNP6 (c)	Support	It commends the emphasis given to the maintenance of local distinctiveness and the conservation of landscape character and the recognition of the importance of Historic Farmsteads being sustainably and sensitively converted and of building upon the findings of the Landscape Character Assessment to deliver green infrastructure enhancements. <b>Noted with thanks.</b>	
	Policies CNP3, CNP4, CNP7 and CNP12	Support	The commitment to support well designed locally distinctive development that is sympathetic to the character of the area including its rural landscape character, strategic views and green spaces is equally commendable, we particularly support the green space designation of land in the foreground of Clifford Castle, thereby helping to protect its setting. <b>Noted with thanks.</b>	No change proposed as a consequence of this representation
	Policy CNP6	Support	The recognition afforded to archaeological remains and both nationally and locally designated heritage assets is also welcomed. <b>Noted with thanks.</b>	
	Policy DNP10 (iii)	Comment	Has concerns over the housing allocation of land north of Lower Court Farm and the potential impact of development upon adjacent and nearby designated heritage assets. As the Plan itself acknowledges the very stringent application of Neighbourhood Plan Policies here (in particular CNP 1 and CNP 6) will clearly be required if an acceptable form of development is to be achieved. <b>The concern expressed is recognised within the plan, which makes it clear that a Heritage Impact Assessment should inform any proposal [paragraph 6.13.9iii)]; this is reflected in the suggested number of dwellings that might contribute</b>	No change proposed as a consequence of this representation

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Comment Parish Council Consideration (in blue)	Response to representation
			towards the required level of housing growth; indicates that development may not be possible across the whole of the site; and lists the other policies that are considered especially relevant.	
S.4 Natural England (Statutory Consultee)	Whole Plan	Comment	<p>No specific comments to make on the draft NDP but refers to an annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan.</p> <p><b>Noted. In relation to the Annex, it is considered that the matters this raises have been covered to the degree to which it is possible within an NDP.</b></p>	No change proposed as a consequence of this representation
S.5 Environment Agency (Statutory Consultee)	Whole Plan	Comment	<p>Herefordshire Council’s Strategic Flood Risk Assessment (SFRA) and Water Cycle Strategy (WCS) updates did not extend to Rural Parishes at the NP level, so it is important that plans for these areas offer robust confirmation that development is not impacted by flooding and that there is sufficient wastewater infrastructure in place to accommodate growth for the duration of the plan period.</p> <p><b>Comment noted. As referred to below, there are a limited number of allocated sites and these are for housing. These are some distance from the area at risk of flooding. There is no public wastewater treatment works serving either settlement within the Parish and policy CNP23 requires it to be shown that wastewater drainage can be accommodated to avoid pollution.</b></p> <p><b>The area at risk of flooding is shown blue on the map below, which is an extract from the Environmental Scoping report.</b></p> 	No change proposed as a consequence of this representation

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Comment Parish Council Consideration (in blue)	Response to representation
	Policies CNP8, CNP9 and CNP10	Comment	In the absence of specific sites allocated within areas of fluvial flooding, would not offer a bespoke comment at this time. You are advised to utilise the attached Environment Agency guidance and pro-forma which should assist you moving forward with your Plan. <b>Comment noted. The proforma was used for the consultation undertaken for Regulation 14.</b>	No change proposed as a consequence of this representation
	Whole Plan	Comment	The Environment Agency's Flood Map provides an indication of 'fluvial' flood risk only and you are advised to discuss matters relating to surface water (pluvial) flooding with Herefordshire Council and their drainage team as the Lead Local Flood Authority (LLFA). <b>Comment noted. Herefordshire Council, who is understood to be the LLFA, was consulted on the draft NDP, and has not provided any adverse comment. Policy CNP23 covers both fluvial and storm water flooding.</b>	
S.6 Highways Agency (Statutory Consultee)			No comment received <b>Assumed have no objections to the plan. There are no roads comprising part of the Strategic Highway (Trunk Road) Network within the Parish.</b>	No change proposed as a consequence of this representation
S.7 NHS Herefords. and Worcs. Clinical Commission'g Group	Whole Plan including policy CNP19	Comment	No direct comment on the plan, but welcome the policy promoting improved broadband and telecommunications infrastructure which is of benefit to the provision of healthcare into rural communities. <b>Noted.</b>	No change proposed as a consequence of this representation
S.8 Coal Authority	Whole Plan	Comment	No specific comments to make on the NDP. <b>Noted.</b>	No change proposed as a consequence of this representation
S.9 Sports England			It is essential that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 96 and 97. It is also important to be aware of Sport England's statutory consultee role in <b>protecting playing fields</b> and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Playing Fields Policy and Guidance document. <a href="https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy">https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy</a> Vital to the development and implementation of planning policy is the evidence base on which it is founded. <a href="https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications">https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications</a> A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may	No change proposed as a consequence of this representation

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	<p style="text-align: center;"><b>Comment</b> <b>Parish Council Consideration (in blue)</b></p>	Response to representation
			<p>specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.</p> <p>Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work. <a href="http://www.sportengland.org/planningtoolsandguidance">http://www.sportengland.org/planningtoolsandguidance</a></p> <p>Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.</p> <p>NPPF Section 8: <a href="https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities">https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities</a></p> <p>PPG Health and wellbeing section: <a href="https://www.gov.uk/guidance/health-and-wellbeing">https://www.gov.uk/guidance/health-and-wellbeing</a></p> <p>Sport England's Active Design Guidance: <a href="https://www.sportengland.org/activedesign">https://www.sportengland.org/activedesign</a></p> <hr/> <p><b>Herefordshire Council has undertaken a Playing Pitch Assessment and an Open Spaces Study. Information within this insofar as it related to Clifford Parish is summarised in the Environmental Scoping Report for the NDP: <a href="https://www.herefordshire.gov.uk/downloads/file/10798/sea_scoping_report_august_2017">https://www.herefordshire.gov.uk/downloads/file/10798/sea_scoping_report_august_2017</a></b></p> <p><b>This identifies that there is only one playing pitch within the Parish, at Clifford Primary School, and that it does not have community access; and in the wider area within which the Parish sits there is extensive under provision for outdoor sport. This is not unusual given that the area assessed comprises all rural communities, with an especially low population density. Hay-on-Wye, the closest town where such facilities might normally be found, is not within its assessment area and is in Wales.</b></p> <p><b>Given the very low population, including population density and profile; the settlement pattern; and the proximity to Hay-on-Wye, a proportionate approach to assessing sporting provision based on local knowledge has not identified either a significant need for or opportunities to provide new sports facilities within the Parish. The extensive network of public rights of way provides for informal leisure activities.</b></p>	

**Section 4.**

**Clifford Neighbourhood Development Plan**

**Schedule of changes made in response to comments received upon the  
Regulation 14 Draft Plan – April 2021.**

**(NB minor typographical and grammatical changes are not listed)**

## Clifford Neighbourhood Development Plan Changes to Draft Plan Following Regulation 14

Change Ref No	Draft Plan Section/reference	Proposed Change	Reason
1	Plan Title page	Amend to read <u>'Submission Draft Plan'</u> .	To indicate the NDP is no longer the Regulation 14 draft plan but is now the Submission Draft plan.
2		Change footer to read: 'Clifford (Herefordshire) Neighbourhood Plan – <u>Submission Draft Plan – Parish Council February 2021'</u>	To indicate this is the rolled forward version of the plan.
3	Paragraph 2.2	Revised third sentence to read: There are 38 km of public roads and <u>53.4</u> km of bridleways and public footpaths <u>and</u> two disused railway lines cross the Parish.	To update the figure on the extent of the public rights of way network.
4	Paragraph 2.7	Revise second sentence to read: Clifford Castle, in Clifford Village, has just undergone a significant restoration by Historic England. Clifford also has 14 Special Wildlife Sites <sup>1</sup> , 18 areas of ancient woodland <sup>2</sup> , and <u>5</u> areas of Common Land.	To indicate the exact number of Commons within the Parish.
5	Picture 2	Delete 'eastwards'.	To reflect that there are many views across the

<sup>1</sup> River Wye; Clifford Common; Ton Wood; Leech Pool; Grove Wood; Hardwick Brook; Mousecastle, Hawks & Scudamore Common Woods; New Coppice; Alt Common & Cot Wood; Little Mountain & Newhouse Wood; Bach Dingle; Roadside verge, south side of B4348; Merbach Hill, Benfield Park & Weston Hill Woods; Windle Wood

<sup>2</sup> Rhydspence Plantation (border); Kiln Ground Wood (border); Ton Wood; Grove Wood; Castleton Hill Wood; Windle Park Wood; Garnold Wood; Hardwick Brook Wood; New Coppice; Pikes Wood; Newhouse Wood; Cot Wood; Cwm Bach Wood; Hawks Wood; Mousecastle Wood; Benfield Park (border); 2 x unlabelled sites in the south east of the Parish.

			parish with this quality.
6	Policy CNP4	Revise introductory paragraph of the policy to read: <b><i>'The following vistas and panoramas in Clifford Parish, including those <u>revealing the character of and associated with the Wye Valley Walk and Herefordshire Trail where they pass through the Parish, should be protected from the adverse effects of development:</u></i></b>	To clarify one of the characteristics being protected.
7	Policy CNP4	Revise the description of View No 3 to read: <b><i>'<u>The series of views along the Wye Valley Walk looking north towards the Wye Valley and uplands beyond, some of them through gaps in Priory Wood's central triangle/core located on the northern frontage along the hamlet's southerly road.</u></i></b>	To clarify the view being protected.
8	Policy CNP5	Amend criterion c) to read: <b><i>'There should be <u>a net gain in biodiversity wherever possible and the loss of any features, where absolutely necessary, shall be offset through full compensatory measures.</u></i></b>	To reflect changes in policy to increase biodiversity.
9	Policy CNP6	Amend criterion c) to read: <b><i>'<u>Supporting development that sustains or enhances the significance of features and the setting of Listed Buildings and other similar heritage assets.</u></i></b>	To frame positively and ensure the criterion complies with national and Core Strategy policy.
10	Policy CNP7	Delete area <b><i>'1) Land adjacent to Oak Cottage, Priory Wood 2) Priory Wood Cottage Paddocks Pastures and Orchards 4) Land in the foreground to Clifford Castle</i></b>	Following advice from the landowners, the areas are considered unlikely to meet the provisions of NPPF paragraph 100.
11	Policy CNP7	The remaining two sites to be renumbered sites 1 and 2.	As a consequence of change 10

12	Paragraph 5.11	Delete explanation for sites 1, 2 and 4.	As a consequence of change 10 above.
13	Maps 2 and 3	Delete the area shown and '1 and 2' on Map 2; delete Map 3 and renumber Local Green Spaces references on Map 2.	To effect change 10 above.
14	Table 1	<u>In row numbered 1 change date December 2020 and number of commitments from 28 to 29. In row 5 second column should read 'Housing potential during plan period <b>excluding future windfalls</b>', and the number should read 41.</u>	To update figures and add clarity to row 5.
15	Asterix 1 footnote to table 1	Amend to read: Included in commitments in line 1 – see paragraph 6.13 (i). <u>An application that would reduce this site from 5 to 4 dwellings is awaiting determination. Should it be approved, the option to develop 5 houses will remain until development commences.</u>	To explain the possibility that the number of dwellings may reduce although this will not affect the ability to deliver the required housing growth.
16	Policy CNP13	Amend criterion b) to read: <b><i>New businesses should make use of redundant rural buildings or utilise previously developed (brownfield) land <u>where possible</u>.</i></b>	To comply with advice from Herefordshire Council.
17	Maps 4 and 5 (Priory Wood and Clifford Policies Maps)	Delete Local Green Space designations shown as 1. Land adjacent to Oak Cottage; 2. Priory Wood Cottage Paddocks Pastures and Orchards; and 4. Land in the foreground to Clifford Castle.	To effect change 10 above.
18	Appendix 1	To add names of Common Land within the Parish and descriptions of their value and importance as Local Heritage Assets.	These assets have been identified by the Parish Open Spaces Officer as important local heritage assets.



19	Appendix 2, paragraph 2.3	For view 3, amend the description to read: 'These views look through important breaks where the Wye Valley Walk passes through the core of the hamlet, enabling visitors and locals to overlook the Wye Valley. <u>Moving from the west, having passed the Presbyterian Church, there is a wide view across to the edge of the Clun and Radnor Forests followed by a series of intermittent views from within the centre of Priory Wood culminating in a panoramic where the route opens out at Malthouse Common.</u> They therefore link the settlement to the rural landscape and represent valued assets that are of more than local importance <u>along a national route.</u> '	To add further to the explanation why the views are important.
20	Appendix 2, Figure 4	Replace Figure 4 with a photograph of the panoramic view from Malthouse Common.  Amend description of photographs to read: ' <b>Figure 3, 4 and 5: Views along the northern frontage of Priory Wood's southerly road, looking north towards the Wye Valley.</b>	To show an important view at the end of the series along this frontage.
21	Map 2.1	<u>Revise map to show the view at the eastern end of the series of views representing the panoramic from Malthouse Common.</u>	To mark to eastern extent of the series of views.
22	Appendix 3	Delete Housing Site Assessment summary and amend paragraph 6.8 to direct readers to the appropriate website location for the full report.	The summary is no longer needed. The full report remains on the parish Council website (NDP).