

## Neighbourhood Planning Team

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**From:** donotreply@herefordshire.gov.uk  
**Sent:** 27 August 2022 12:06  
**To:** Neighbourhood Planning Team  
**Subject:** Online form submitted: Comment on a proposed neighbourhood area

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### Comment on a proposed neighbourhood area

We have received the following form online. Reference: 843209

Question	Response
Address	REDACTED
Postcode	REDACTED
First name	Alan
Last name	Curtis
Which plan are you commenting on?	Walford
Comment type	Comment
Your comments	<p>I support the NDP and appreciate all the hard work and time it must have taken to draft it. My only comment is that I believe it makes sense to change the settlement boundary on Church Lane to stop at the dead end sign following the recent decision made by the regulatory and planning committee that the area adjacent to it is open countryside not suitable for building on the grounds of sustainability and major road safety concerns. There are flooding issues in this location and the green fields help act as a sponge to absorb water. The area has many springs. Howle Hill is not on mains drains and building in open countryside on green fields would add to flooding issues. REDACTED.</p>

Question	Response
Address	REDACTED
Postcode	REDACTED
First name	Andrew
Last name	Corbett
Which plan are you commenting on?	Walford Parish NDP
Comment type	Comment
Your comments	<p>Dear All, I wholeheartedly support the NDP document. The Steering Group and the Parish Council ought to be highly commended on their efforts. It is a highly satisfactory document that should hold great weight and consideration in development matters relating to Walford Parish. I would like to make a suggestion in light of the recent Herefordshire Council Planning and Regulatory Committee meeting, as regards application number P204443 (Land adjacent to the Old Kilns, Church Lane, Howle Hill, Ross on wye, Herefordshire). The Committee refused planning permission on this site due to it being outside the settlement boundary and in open countryside and is not a sustainable site for development. Therefore contrary to the Walford NDP, Herefordshire Core strategy and the NPPF; The site lies outside of the settlement boundary as defined in Walford Neighbourhood Development Plan, as such the site is considered to be in an open countryside location and is not well related to the main built up form of Howle Hill. There would be associated landscape harm in the open countryside. In view of the sites rural location a lack of local services and poor transport connectivity future residents would be entirely reliant upon the use of private motor vehicles in a location where new residential development of this type is not supported unless it meets exceptional criteria. Therefore, the proposal represents an unsustainable form of development contrary to Policies WALF4 and WALF20 of the Walford Neighbourhood Development Plan, RA2, RA3 and LD1 of the Herefordshire Core Strategy, and the National Planning Policy Framework. In light of this decision/refusal may I suggest the settlement boundary definition line be moved back to the No Through Road sign that is adjacent to The Old Barn in Church Lane. To my mind it would appear to make good common sense, as beyond this we have open countryside, the lane narrows making it difficult to traverse. I note the comments made by a number of the Committee members about this site being the worst ever, and I assume they see a number of them. One Councillor asked why the application had even reached this stage. To move the settlement Boundary back to the No Through Road sign would illustrate a clearer picture of the open countryside and farmland. I submit for your kind consideration, Thank You, Andrew Corbett,</p>

Question	Response
Address	REDACTED
Postcode	REDACTED
First name	Andrew
Last name	Eyre
Which plan are you commenting on?	Walford NDP
Comment type	Objection
Your comments	<p>I would like to take the opportunity to object to the proposal of Site 11R within the Walford NDP in that councillors have failed to adhere fully to parishioner's concerns and that the weighting used to determine sites was flawed in that it failed to address significant impacting factors, namely: 1. Infrastructure to support the development, the NDP sited School access for new residents but failed to note the lack of and impact to existing utilities e.g. there is no gas main available so houses would require oil heating and the impact of existing drainage for the extra housing has not been fully represented. 2. The cost to build new road access onto the B4234 Walford Road would impinge on any new development, a housing developer would wish to profit from the enterprise and the new road access coupled with the above required infrastructure would obviously require a larger site to be constructed to therefore be profitable. 3. New road access would increase the chances of a larger site development, which would go against parishioner's wishes, as expressed in several meetings. The route to Kerne Bridge and beyond is significantly affected by the requirement to travel via Ross High Street and through the already congested Copse Cross Street. 4. The current Agricultural land is being used as such and therefore must be profitable and, in times of Global Food risk, this must be a prime consideration as well as the erosion of Agricultural land as a whole. Previous development in the village, of a similar scale to the proposal, have been on 'brown field' sites i.e. Alder Close was a previously a Builders Maintenance Yard and Priory Lea and Cedar Grove was a hotel site. In the opinion of Parishioners, their preference for small sites that run along the road side, in tradition with previous builds and without risk of increasing or adjoining other sites, has been overridden by the Councils' requirement to fulfil its NDP housing commitment. Albeit they have met the commitment in smaller sites, they continually revert to site 11R regardless of the larger development risk, the environmental and infrastructure impact and against Parishioners wishes and concerns. At a recent review of the NDP the Parish Council provided Parishioners with only 15 minutes to site their objections and then continued to vote in favour, even though Parishioners at the meeting raised increasing concern at the proposed road access and the risk to an increased number of houses being developed. The proposal</p>

to protect further development of site 111R by bringing the site within the Settlement Boundary is also flawed as it fails to adjoin to Cedar Grove via road access and would still require a new access road onto the B4234. Historically, all sites that have had an access to the Walford Road, Alder Close, Priory Lea and Green Colley Grove, have closed access, meaning they have no access for further development opportunity being they are cul-de-sac or Close's (Closed roads). The proposal for site 11R clearly does not follow this and leaves the site open to a larger development and adjoining to site 21. Main Points: • New road access required • Utilities and Infrastructure, heating and sewage impact • Development will lead off the main highway, not in keeping with existing development and fails to deter further site increase and/or adjoining • Loss of currently profitable arable farming land • Impact of existing access roads • Increased size of Coughton end of Walford Village

## Neighbourhood Planning Team

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**From:** Turner, Andrew  
**Sent:** 26 August 2022 16:36  
**To:** Neighbourhood Planning Team  
**Subject:** RE: Walford Regulation 16 submission neighbourhood development plan consultation

### RE: Walford Regulation 16 Neighbourhood Development Plan (NDP)

Dear Neighbourhood Planning Team,

I refer to the above and would make the following comments with regard to the proposed development areas identified in the 'Walford Regulation 16 submission neighbourhood development plan consultation':

It is my understanding that you do not require comment on Core Strategy proposals as part of this consultation or comment on sites which are awaiting or have already been granted planning approval.

Having reviewed Ordnance survey historical plans, I would advise the following regarding the four sites (Policy WALF21: Proposed Housing Sites) indicated in brown on Maps 6,7 and 9 that have been allocated for housing development:

**a) Land amounting to approximately 0.45 ha on north side of Leys Hill Lane.**

- The site has historically been used as orchards. By way of general advice I would mention that orchards can be subject to agricultural spraying practices which may, in some circumstances, lead to a legacy of contamination and any development should consider this.

**b) Land amounting to approximately 0.65 ha at Arthur's Dingle adjacent to the B4234.**

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

**c) Land amounting to approximately 0.8 ha at Lower Field at Orchards Heights.**

- The site has historically been used as orchards. By way of general advice I would mention that orchards can be subject to agricultural spraying practices which may, in some circumstances, lead to a legacy of contamination and any development should consider this.

**d) Land amounting to approximately 0.45 ha off Watling Street**

- Our records suggest that the proposed development is located within 250 metres of former landfill site (Vine tree Farm). The site's potentially contaminative use would therefore require consideration prior to any development.

Any future redevelopment of the site would be considered by the Planning Services Division of the Council however, if consulted it is likely this division would recommend any application that is submitted should include, as a minimum, a 'desk top study' considering risk from contamination in accordance with BS10175:2011 so that the proposal can be fully considered. With adequate information it is likely a condition would be recommended such as that included below:

1. No development shall take place until the following has been submitted to and approved in writing by the local planning authority:
  - a) a 'desk study' report including previous site and adjacent site uses, potential contaminants arising from those uses, possible sources, pathways, and receptors, a conceptual model and a risk assessment in accordance with current best practice
  - b) if the risk assessment in (a) confirms the possibility of a significant pollutant linkage(s), a site investigation should be undertaken to characterise fully the nature and extent and severity of contamination, incorporating a conceptual model of all the potential pollutant linkages and an assessment of risk to identified receptors
  - c) if the risk assessment in (b) identifies unacceptable risk(s) a detailed scheme specifying remedial works and measures necessary to avoid risk from contaminants/or gases when the site is developed shall be submitted in writing. The Remediation Scheme shall include consideration of and proposals to deal with situations where, during works on site, contamination is encountered which has not previously been identified. Any further contamination encountered shall be fully assessed and an appropriate remediation scheme submitted to the local planning authority for written approval.

Reason: In the interests of human health and to comply with policy SD1 of the Herefordshire Local Plan – Core Strategy and the National Planning Policy Framework.

2. The Remediation Scheme, as approved pursuant to condition no. (1) above, shall be fully implemented before the development is first occupied. On completion of the remediation scheme the developer shall provide a validation report to confirm that all works were completed in accordance with the agreed details, which must be submitted and agreed in writing before the development is first occupied. Any variation to the scheme including the validation reporting shall be agreed in writing with the Local Planning Authority in advance of works being undertaken.

Reason: In the interests of human health and to comply with policy SD1 of the Herefordshire Local Plan – Core Strategy and the National Planning Policy Framework.

3. If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the local planning authority) shall be carried out until the developer has submitted, and obtained written approval from the local planning authority for, an amendment to the Method Statement detailing how this unsuspected contamination shall be dealt with.

Reason: In the interests of human health and to comply with policy SD1 of the Herefordshire Local Plan – Core Strategy and the National Planning Policy Framework.

#### Technical notes about the condition

1. Assessment is required to be undertaken in accordance with good practice guidance and needs to be carried out by a suitably competent person as defined within the National Planning Policy Framework 2019.
2. All investigations of potentially contaminated sites are required to undertake asbestos sampling and analysis as a matter of routine and this should be included with any submission.
3. Where ground gas protection measures are required, they shall be validated in accordance with current best practice guidance.

#### **e) Land amounting to approximately 0.45 ha south of Cedar Grove, Coughton**

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

#### General comments:

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

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

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

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

Kind regards

Andrew

# Herefordshire.gov.uk

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Andrew Turner  
Technical Officer (Air, Land & Water Protection)  
Economy & Environment Directorate  
Direct Tel: 01432 260159  
Email: [aturner@herefordshire.gov.uk](mailto:aturner@herefordshire.gov.uk)



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## Neighbourhood Planning Team

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**From:** Banks, Samantha  
**Sent:** 25 August 2022 18:53  
**To:** Neighbourhood Planning Team  
**Subject:** FW: Walford Parish NDP

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**From:** Anselm Panes  
**Sent:** 24 August 2022 07:57  
**To:** Banks, Samantha <Samantha.Banks2@herefordshire.gov.uk>  
**Subject:** Walford Parish NDP

This message originated from outside of Herefordshire Council or Hoople. Please do not click links or open attachments unless you recognise the sender and know the content is safe.

I am writing to raise concerns over some aspects of the NDP.

Plot 11 has obviously been targeted by the landowners for a large development. It has been made clear at all of the parish consultations that we don't don't want a large development. While we know that plot 11 is now proposed for just 5 houses REDACTED. We have seen in Ross that settlement boundaries agreed in the NDP were later overridden in favour of a much larger development. So I feel we should be making these points again as the parish council have not represented the community position very well REDACTED.

These are the main criteria for keeping the developments small

1. AONB
2. Prime Agricultural land on Plot 11 (and 21 were it to be developed)
3. Sight , light and land pollution
4. Considerable interest from large landowners to develop Plot 11 and 21.
5. Access to Ross from the Walford side is very restricted.
6. Development on Plot 11 looks like it is being designed to give best chance of access to plot 21 (plot 21 being ruled out currently because there is not sufficient access). REDACTED.

Regards  
Anselm and Judith Panes  
REDACTED



## Neighbourhood Planning Team

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**From:** donotreply@herefordshire.gov.uk  
**Sent:** 28 August 2022 12:36  
**To:** Neighbourhood Planning Team  
**Subject:** Online form submitted: Comment on a proposed neighbourhood area

This message originated from outside of Herefordshire Council or Hoople. Please do not click links or open attachments unless you recognise the sender and know the content is safe.

### Comment on a proposed neighbourhood area

We have received the following form online. Reference: 843292

Question	Response
Address	REDACTED
Postcode	REDACTED
First name	Ashley
Last name	Beddis
Which plan are you commenting on?	Walford
Comment type	Support
Your comments	Thank you for drafting the NDP. I do support it . My only concern is that on Church Lane which is a narrow dead end is the only way I can reach my sheep. Please could the settlement boundary be brought back to the dead end sign. I know this is where the council tractor turns around as it is just not possible to go beyond this point on a tractor. It is all open country side and farmland and not suitable for building. Thank you

## Neighbourhood Planning Team

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**From:** donotreply@herefordshire.gov.uk  
**Sent:** 26 August 2022 14:22  
**To:** Neighbourhood Planning Team  
**Subject:** Online form submitted: Comment on a proposed neighbourhood area

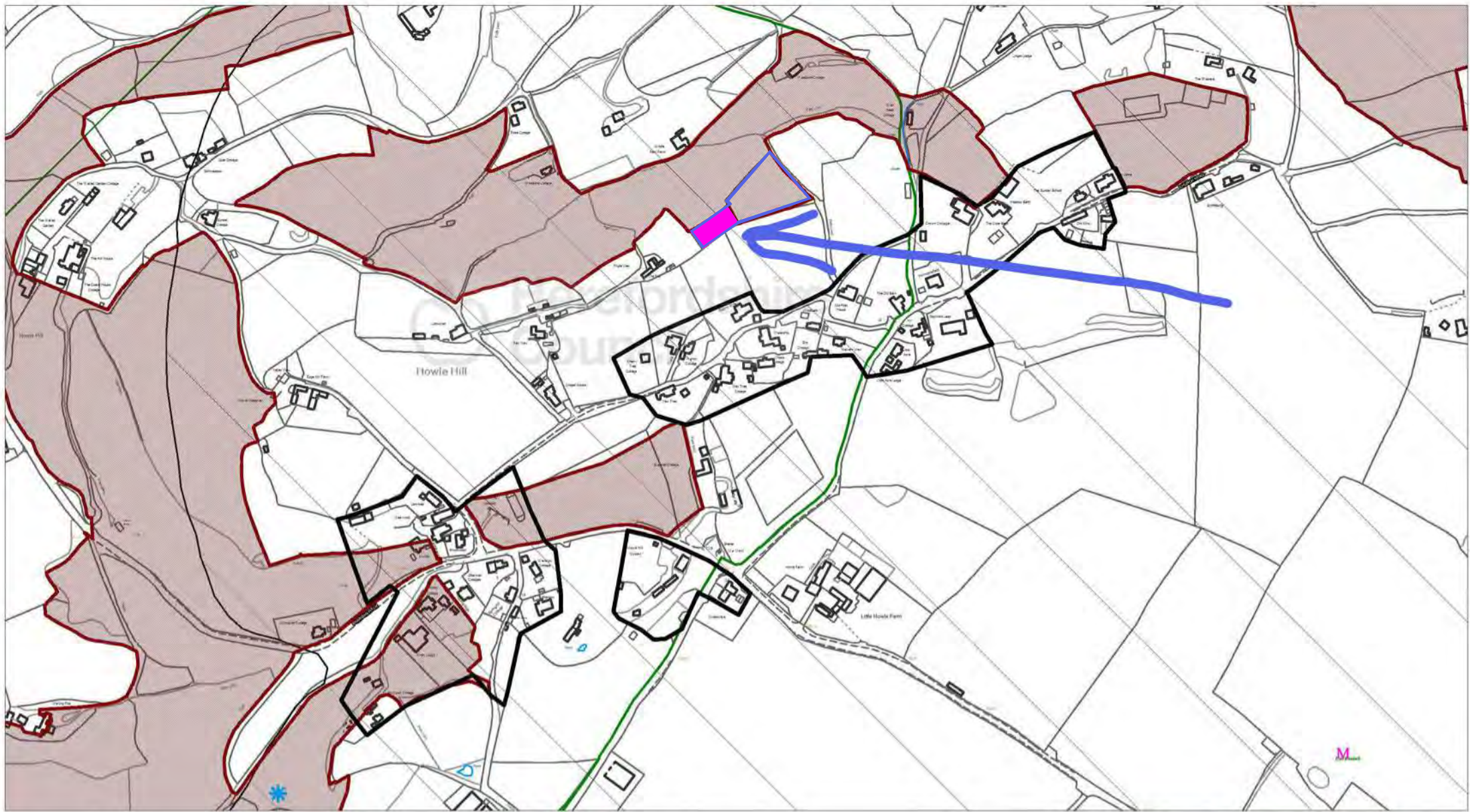
This message originated from outside of Herefordshire Council or Hoople. Please do not click links or open attachments unless you recognise the sender and know the content is safe.

### Comment on a proposed neighbourhood area

We have received the following form online. Reference: 843081

Question	Response
Address	REDACTED
Postcode	REDACTED
First name	Charlotte
Last name	Patrick
Which plan are you commenting on?	Walford Neighbourhood development plan
Comment type	Support
Your comments	<p>Speaking with my neighbour recently about the hard work that has gone into the NDP, I would also like add my support. I am in agreement with with her that it makes sense to bring back the settlement boundary line on Church Road, Howle Hill to the dead-end sign because after this sign it is open countryside on a dead-end lane that is not the entrance to the hamlet but on the periphery. I copy the rest of her comments and would like to express my agreement with all of them: "The cluster for this area appears as the largest when it is not the centre of the hamlet or part of the main built-up form. The council tractor stops before the dead-end sign after it trims the hedges because after the sign the lane leads to such narrow access that the tractor cannot go any further. Recently a planning and regulatory committee decision has been made that the area adjacent to the current settlement boundary line is not suitable for development in the open countryside due to it being unsustainable on a single track narrow lane with no passing places on a dead end. The area being defined as RA3. This part of the hamlet is open countryside and the historical buildings of the church, the school house and the pub have long been residences for many years. It would not be appropriate to build in open countryside and farmland so I believe the settlement boundary should stop at the dead-end sign."</p>

Question	Response
Address	REDACTED
Postcode	REDACTED
First name	claire
Last name	anthony
Which plan are you commenting on?	Walford
Comment type	Support
Your comments	<p>May I once again take this opportunity of thanking all those who have been involved in the development of the impressive draft NDP thereby enabling the local community to be more actively involved in development decisions. Please may I make 2 suggestions regarding the map of Howle Hill 1. The settlement boundary down Church Lane appears far longer on paper than the area in reality. For the following reasons please may I suggest the end of the settlement boundary be moved to the location of The Old Barn: a. Beyond The Old Barn, Church Lane is a dead end narrow winding lane b. The 'no through road' sign is located outside The Old Barn c. There is a narrow pinch-point at The Old Barn between the end wall of the cottage &amp; the neighbours hedge opposite which cannot be widened d. The hedges at The Old Barn have already been damaged on numerous occasions by vehicles, as well as the wall around The Old Barn also having been repeatedly hit 2. The land owned by REDACTED appears to have been split in 2 with part included within the wildlife boundary &amp; part not. All of the plot is woodland and is used solely for wildlife purposes. Please could the map reflect this. The land in question is a rectangle depicted in white located behind Sunnyside, whilst the rest of the same plot to the right is depicted as woodland. As it is not possible to upload a file to this comments section, I will email an annotated map to <a href="mailto:neighbourhoodplanning@herefordshire.gov.uk">neighbourhoodplanning@herefordshire.gov.uk</a> I do hope my suggestions will be taken into consideration before finalization of the boundary map. Kind regards, Claire Anthony</p>



-  Settlement Boundary (WALF20)
-  Scheduled Ancient Monuments
-  Local Wildlife Site (LWS)
-  Safeguarding Mineral Reserves
-  Area of Outstanding Natural Beauty
-  Local Geological Sites

## Howle Hill village Policies Map

Scale 1:5,000  
at A4 size



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Question	Response
Address	REDACTED
Postcode	REDACTED
First name	Clifford John
Last name	Bush
Which plan are you commenting on?	Walford Neighbourhood Development Plan (NDP)
Comment type	Objection
Your comments	<p>We write regarding objecting to building on Plots 11 and 21; as no doubt once Plot 11 can build houses, the agricultural land of Plot 21 will ask for planning permission to build residences as it is adjacent to Plot 11. This will involve large housing developments which the village can not sustain. The Parish Councillors and NDP Committee have not taken into account the residents objections to any further development in Walford and especially with regards to Plot 11. At one meeting due to the large number of the public attending the Councillors voted not to allow large developments on Plot 11 as this would allow for a huge number of dwellings to be built on the adjacent plots, including Plot 21. Subsequently, at a further meeting the Councillors agreed to include Plot 11 into the NDP, again against the residents wishes, REDACTED. Plot 21, which will be accessible from Plot 11, we understand, belongs to REDACTED. Interestingly enough REDACTED and it is clear from attending the meetings and the decisions taken REDACTED. The plan includes key agricultural land and for sustainability it should remain so. Coughton Marsh will sustain damage, the draining of land for two reservoirs has already caused damaged to wildlife and in fact has harmed the marsh. Plot 11 has flooded and building on this plot will cause the area to suffer: - More flooding - Increased sound, light and environmental pollution. - Lack of agriculture land - Major health and safety issues; increased pollution levels, increased traffic and accidents due to the closeness of the school. Furthermore the B4234 cannot cope with more congestion, especially as it has been brought down to one land; the landslide has not been repaired and it has been frequently been closed due to landslides. Also the roads in Ross on Wye are becoming more difficult to access and continual traffic jams are experienced. - Residents have no access to a local shop, dentists or doctors. Ross on Wye</p>

cannot cope with the population numbers it has now. The consultant employed to assist with the NDP Plan REDACTED. Plots 11 and 21 are in an area that have bats and owls, as well as other wildlife. Species must be protected and the impact on the Area of Nature Beauty not be affected. Thus no buildings should be erected on these plots. The flooding in Walford and Coughton will become a major problem. The high volume of developments in Ross on Wye and surrounding areas already, has caused a problem with the infrastructure and therefore Herefordshire Council should consider the impact of further developments in the village of Walford/Coughton as it simply is not coping now. To clarify the objection is against building property on Plots 11 and 21. Thank you for reading this objection.

FAO Mr J Latham – Technical, Monitoring and Graphical Officer

**BY EMAIL: [neighbourhoodplanning@herefordshire.gov.uk](mailto:neighbourhoodplanning@herefordshire.gov.uk)**

9<sup>th</sup> February 2022

Dear Mr Latham

**Re: Walford Neighbourhood Development Plan**

Thank you for your notification received on the 6<sup>th</sup> July 2022 in respect of the above consultation.

The Coal Authority is a non-departmental public body sponsored by the Department of Business, Energy & Industrial Strategy. As a statutory consultee, The Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.

Within the Neighbourhood plan area, as defined, our records indicate that past coal mining features are present at surface and shallow depth including; mine entries, probable unrecorded coal workings and surface mining sites. These features may pose a potential risk to surface stability and public safety.

The Coal Authority's records also indicate that surface coal resource is present in the area, although this should not be taken to imply that mineral extraction would be economically viable, technically feasible or environmentally acceptable. As you will be aware those authorities with responsibility for minerals planning and safeguarding will have identified where they consider minerals of national importance are present in your area and related policy considerations. As part of the planning process consideration should be given to such advice in respect of the indicated surface coal resource.

It does not however appear that any new sites are proposed for allocation in the Neighbourhood plan in the areas where our records indicate that coal mining features are present at surface and shallow depth. On this basis the Planning team at the Coal Authority have no specific comments to make on this document.

Please do not hesitate to contact me should you wish to discuss this further.

Yours sincerely

*Melanie Lindsley*

**Melanie Lindsley** *BA (Hons), DipEH, DipURP, MA, PGCertUD, PGCertSP, MRTPI*  
**Development Team Leader (Planning)**



**Making a better future for people  
and the environment in mining areas**



Mr David Jordan

16<sup>th</sup> August 2022

To: Samantha Banks – Neighbourhood Development Manager

Reference – Walford NDP Proposals

Dear Samantha

I wish to register my objection to the proposals put forward by the Walford Parish Council NDP Committee.

The way that they are proposing to segregate the Parish of Walford is totally wrong. The Parish as a whole need's development, not just in selected areas. Take Howle Hill [REDACTED] [REDACTED] They are proposing to split it into three segments. This is an absolute joke! I can quite clearly see that this has been proposed to stop development, when Howle Hill has been highlighted by Herefordshire County Council for development.

The whole of Howle Hill share the same post code – HR9 5SP, so surely the whole of that post code area should be within the building development boundaries. Yet, if you look at the proposed boundary lines it is only a very select few houses that are covered, [REDACTED]

As I understand [REDACTED] is a member of Walford NDP Committee and has had a great deal of input into the proposals by Walford NDP. [REDACTED]

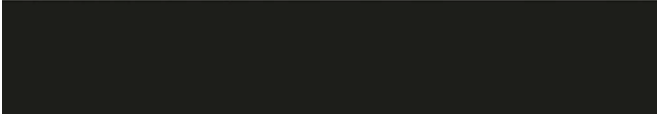
The Consultant Walford NDP Committee employed, Mr Bill Bloxham, openly admitted in a Zoom meeting, of which we have a recording, that he had given Walford NDP Committee advice and recommendations on the sites to be put forward to the public [REDACTED]

In 2017 ACOM carried out a draft sight assessment report. Their findings and what is proposed now are entirely different. ACOM are a totally independent body. With all this in mind, can you please dismiss the finding of the Walford NDP [REDACTED]

The Walford NDP have been very clever and selective of where they have advertised any of the meeting held. This is proved by the very low number public that attended the individual meeting.

Several residents have also stated that when the asked the then Clerk of Walford Parish Council – Dave Berry – for information packs regarding the proposals they were told he had not got time to deal with their request and would have to wait. Consequently no information packs were sent out.

Yours sincerely

A solid black rectangular box redacting the signature of David Jordan.

DAVID JORDAN

## Neighbourhood Planning Team

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**From:** Ryan Norman <Ryan.Norman@dwrcymru.com>  
**Sent:** 30 August 2022 16:51  
**To:** Neighbourhood Planning Team  
**Subject:** {Disarmed} RE: Walford Regulation 16 submission neighbourhood development plan consultation  
**Attachments:** RE: Walford Neighbourhood Development Plan – Regulation 14 Consultation

This message originated from outside of Herefordshire Council or Hoople. Please do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Sir/Madam,

Thank you for consulting Welsh Water.

I note that the Consultation Statement states that Welsh Water did not respond to the Reg 14 consultation – this is incorrect. Please see attached representation which was sent to the Parish Clerk prior to the 16<sup>th</sup> Feb closing date.

As such, please accept these comments as our Reg 16 consultation response too.

Kind regards,



**Ryan Norman**  
Development Growth Manager | Developer Services |  
Dŵr Cymru Welsh Water

T: 0800 917 2652 | E: 40719 | M: 07557812548

A: PO Box 3146, Cardiff, CF30 0EH



W: [dwrcymru.com](http://dwrcymru.com)

E: [developer.services@dwrcymru.com](mailto:developer.services@dwrcymru.com)

## Neighbourhood Planning Team

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**From:** Ryan Norman <Ryan.Norman@dwrcymru.com>  
**Sent:** 11 February 2022 11:52  
**To:** Walford Parish Council Clerk  
**Subject:** RE: Walford Neighbourhood Development Plan – Regulation 14 Consultation

Dear Nick,

Thank you for the below consultation.

As you have indicated in section 2.19 of the NDP, the Lower Cleeve Wastewater Treatment Works (WwTW) sewerage catchment extends to serve the settlements of Coughton and Walford. Aside from these areas, the remainder of the Parish is not served by the public sewerage network.

With regard to the public sewerage system, we are particularly welcoming of the inclusion of Policy WALF8 Wastewater Drainage which seeks to ensure there is sufficient capacity at the WwTW or within the public sewerage network to accommodate new development. As you have referred to, there was a recent scheme at Lower Cleeve WwTW to ensure that there is capacity to accommodate the development expected within Ross on Wye and the surrounding Parish Council areas served by the WwTW over the period of the Herefordshire Core Strategy.

With regard to the developments sites identified in the pro-forma, there are no issues in providing those within Bishopswood with a supply of potable water with water mains available in the respective adjacent roads. As you are aware, there is no public sewerage system in this location. With regard to the proposed site within the Ross on Wye Urban Fringe, there are no issues in providing this site with a supply of potable water nor accommodating the foul flows in the public sewerage network – both water mains and a public sewer are available in the adjacent Watling Street.

I trust that the above is useful, but if you do require any further information please let me know.

Kind regards,



**Ryan Norman**  
Lead Forward Plans Officer | Developer Services |  
Dŵr Cymru Welsh Water

T: 0800 917 2652 | E: 40719 | M: 07557812548

A: PO Box 3146, Cardiff, CF30 0EH



W: [dwrcymru.com](http://dwrcymru.com)

E: [developer.services@dwrcymru.com](mailto:developer.services@dwrcymru.com)

## Neighbourhood Planning Team

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**From:** donotreply@herefordshire.gov.uk  
**Sent:** 31 August 2022 01:14  
**To:** Neighbourhood Planning Team  
**Subject:** Online form submitted: Comment on a proposed neighbourhood area

This message originated from outside of Herefordshire Council or Hoople. Please do not click links or open attachments unless you recognise the sender and know the content is safe.

### Comment on a proposed neighbourhood area

We have received the following form online. Reference: 843773

Question	Response
Address	REDACTED
Postcode	REDACTED
First name	Diana
Last name	Owen
Which plan are you commenting on?	Walford NDP - June 2022
Comment type	Support
Your comments	<p>It has been a long and protracted journey starting in 2012 to get to this point where a Local Plan can be adopted taking in all the considerations of the Herefordshire Local Plan, especially when Policies change, Council Members leave and the current Steering Party should be commended on the amount of time they have taken to be as inclusive of all parties concerned. The research that has been undertaken and the proof-reading so that the content cannot be misconstrued is a credit to their diligence when so many other documents have been full on errors, misspellings and contradictions. In the case of the Diagram that shows the settlement boundary line for Howle Hill being along Church Road, it would in my opinion and logically sensible, to query why the settlement boundary line is not where the dead-end sign is on Church Road. as beyond this point the lane disappears into open countryside. The Church, the School House and the Pub have all long gone and been turned into private residences and the single lane is for access only to these and the other few properties nearby. As such, the settlement boundary line should be moved back to the road sign depicting that the lane is a dead-end. This section of the Hamlet has not been highlighted for being suitable or sustainable for development and therefore it would make more sense to re-position the settlement boundary line to the dead-end sign.</p>

## Neighbourhood Development Plan (NDP) – Core Strategy Conformity Assessment

From Herefordshire Council Strategic Planning Team

Name of NDP: Walford Regulation 16

Date: 22/08/22

<b>Draft Neighbourhood plan policy</b>	<b>Equivalent CS policy(ies) (if appropriate)</b>	<b>In general conformity (Y/N)</b>	<b>Comments</b>
WALF1: Promoting Sustainable Development	SS1; SS2; SS4; SS5; SS6; RA2; RA6; MT1; E3; LD1	Y	
WALF2: Development Strategy	RA2; RA3; RA4; RA5; H3	Y	
WALF3: Major Development Within the Wye Valley AONB	N/A	Y	
WALF4: Conserving the Landscape and Scenic Beauty of the Parish	SS6; LD1	Y	
WALF5: Protecting Important Views within the Parish and the Settings of its Settlements	SS6; LD1	Y	
WALF6: Enhancement of the Natural Environment	SS6; LD2; LD3	Y	
WALF7: Protecting Heritage Assets	SS6; LD4; RA3	Y	
WALF8: Wastewater Drainage	SS6; SD3	Y	
WALF9: Protection from Flood Risk	SS6; SD3	Y	

<b>Draft Neighbourhood plan policy</b>	<b>Equivalent CS policy(ies) (if appropriate)</b>	<b>In general conformity (Y/N)</b>	<b>Comments</b>
WALF10: Sustainable Design	SD1; SS1; SS6	Y	
WALF11: Renewable and Low Carbon Energy Generation	SD2	Y	
WALF12: Highway Design Requirements	SS4; MT1	Y	
WALF13: Traffic Measures within the Parish	SS4; MT1	Y	
WALF14: Protection and Enhancement of Community Facilities and Businesses serving the Local Community	SC1	Y	
WALF15: Contributions to Community Facilities	SC1	Y	
WALF16: High Speed Broadband and Telecommunications	N/A	Y	
WALF17: Design and Appearance	SD1	Y	
WALF18: Housing Development in Walford and Coughton	RA2	Y	
WALF19: Housing Development in Bishopswood	RA2	Y	
WALF20: Housing Development in Howle Hil	RA2	Y	
WALF21: Proposed	RA2	Y	

<b>Draft Neighbourhood plan policy</b>	<b>Equivalent CS policy(ies) (if appropriate)</b>	<b>In general conformity (Y/N)</b>	<b>Comments</b>
Housing Sites			
WALF22: Use of Rural Buildings for Business	E1; RA5; RA6	<b>Y</b>	
WALF23: Polytunnel Proposals	N/A	<b>Y</b>	

**Other comments/conformity issues:**

The plan is in general conformity with the policies of the Core Strategy and Strategic Planning therefore raises no objections to this NDP.



Herefordshire Council  
Neighbourhood Planning  
Plough Lane  
Hereford  
HR4 0LE

**Our ref:** SV/2018/109876/OR-  
57/PO1-L01

**Your ref:**

**Date:** 06 July 2022

**F.A.O: James Latham**

Dear James

### **WALFORD PARISH REGULATION 16 NEIGHBOURHOOD PLAN**

I refer to your email of the 6 July 2022 in relation to the Regulation 16 Walford Neighbourhood Development Plan (NDP).

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

**Flood Risk:** We would not, in the absence of specific sites allocated within areas of fluvial flooding, offer a bespoke comment on flood risk at this time. However, it should be noted that the Flood Map provides an indication of 'fluvial' flood risk only. You are advised to discuss matters relating to surface water (pluvial) flooding with the drainage team at Herefordshire Council.

**River Wye SAC Catchment:** It is noted that Walford falls within the Lower Wye catchment area and, although this area is not failing its water quality objectives at present, an AA has been undertaken in light of recent comments from Natural England (NE). As confirmed within the AA document the most significant issue within the River Wye SAC Catchment (included the River Lugg) relates to water quality and the potential impact of policies and site allocations within the NDP's.

NE are the primary statutory consultation body for AA's and, ultimately, they would need to be satisfied that there is reasonable certainty to take forward the Policies and site allocations in the NDP in discussion with your Council. We have previously provided comment on similar NDPs' with a view to ensuring a robust submission and that

Environment Agency  
Hafren House, Welshpool Road, Shelton, Shropshire, Shrewsbury, SY3 8BB.  
Customer services line: 03708 506 506  
[www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)

Cont/d..

development can be achieved without impact on the integrity of the SAC, primarily within the Lugg Catchment.

In this instance, as stated above, Walford falls in the Lower Wye Catchment and in an area that is not currently failing its water quality objectives. Therefore we would raise no concerns at this time.

Yours faithfully

**Mr. Graeme Irwin**  
**Planning Specialist**  
Direct e-mail [graeme.irwin@environment-agency.gov.uk](mailto:graeme.irwin@environment-agency.gov.uk)

## Neighbourhood Planning Team

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**From:** Frederick Gibbs  
**Sent:** 25 August 2022 19:42  
**To:** Neighbourhood Planning Team  
**Subject:** Objection to Walford Neighbourhood Development Plan

This message originated from outside of Herefordshire Council or Hoople. Please do not click links or open attachments unless you recognise the sender and know the content is safe.

My name; Frederick Gibbs

Address; REDACTED

Tel; REDACTED

Dear Sirs,

I am writing to register my objections to the inclusion within the Walford Parish Council NDP of a development of five houses at the tendered Site 11 (R3) in the Coughton settlement. When first tendered, the submission provided for the development of 44 houses; this was subsequently reduced by the landowner to 22, but as the Parish Council accepted arguments by local parishioners that there was clearly no requirement for any development of this size, which would substantially impact to the detriment of this semi-rural area, within an AONB, the tendered site should be excluded. It was also of considerable concern that the approval of this site for development would have given access from the main road to another site (Site 21), which had been tendered for consideration by a different landowner (REDACTED), involving a development of up to 60 houses, REDACTED.

It seems self-evident that the latest, much reduced submission for a development of five houses, if approved, would not be the end of the matter - and that the new nucleus of five houses would be regarded as a springboard for further additions, resulting in future bids for more development that would inevitably be insatiable to the point of converting the area into an out-of-town urban sprawl, lacking in any infrastructure.

Of particular relevance are the facts that Walford Parish Council consists of thirteen councillors; REDACTED. Of the remaining REDACTED.

Not unnaturally, REDACTED. However, the problem here is that the existing settlements can bear very little further development without

the consequence of residents having the nature of their environment being changed from semi-rural to urban.

Within the Parish Council, REDACTED. REDACTED.

Added to these issues is the further fact that this latest proposal for five properties on Site 11 (R3) was only discussed at an Extraordinary Parish Council Meeting on 7 April 2022, which was called at short notice and therefore lacked much public attendance; this meeting was *after* the Parish Council had made its determinations in the matter in response to urgent concerns raised by parishioners. The extraordinary meeting appears to have been precipitated by the Council's independent consultant, REDACTED. REDACTED. Predictably, REDACTED, which ignored the reiterated "stepping stone" arguments raised by certain members of the public present, resulting in a vote of six votes to two in favour of inclusion.

Other major objections to the development at Site 11 include the the adverse impact on the AONB in which it is situated - and, in particular, on Coughton Marsh and the wildlife it supports; nor is there any need for the inclusion of this site, as the development target can easily be achieved without it; also, the land in question is of a prime agricultural grade and there is current consternation at our increasing incapacity to be self-sufficient in food production as a nation, REDACTED, rather than food for the population.

Having said that, REDACTED. Even so, REDACTED.

Yours faithfully,

Frederick Gibbs

## Neighbourhood Planning Team

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**From:** donotreply@herefordshire.gov.uk  
**Sent:** 18 August 2022 12:21  
**To:** Neighbourhood Planning Team  
**Subject:** Online form submitted: Comment on a proposed neighbourhood area

This message originated from outside of Herefordshire Council or Hoople. Please do not click links or open attachments unless you recognise the sender and know the content is safe.

### Comment on a proposed neighbourhood area

We have received the following form online. Reference: 841392

Question	Response
Address	REDACTED
Postcode	REDACTED
First name	geoffrey
Last name	lewis
Which plan are you commenting on?	walford ndp
Comment type	Objection
Your comments	Plot 11 is prime agriculture land and if you build houses on it where are you going to get land to replace the land lost .You cant as they are not making any more land.Therefore this scheme is not sustainable and should be dropped.

Question	Response
Address	REDACTED
Postcode	REDACTED
First name	Hannah
Last name	Francis
Which plan are you commenting on?	Walford, Ross on Wye
Comment type	Objection
Your comments	<p>Dear Sir or Madam, I wish to register my objection to Walford Neighbourhood Development Plan (NDP). I, along with a vast number of other residents of Walford Parish have received no notification or information regarding this matter. As a Parish we need development on a limited scale and over a long period of time. This will ensure sustainability and enable the young people of the Parish to be able to afford to stay within the Parish. In a government white paper, it states “that towns and cities across the country cannot withstand much more development and that consideration should be given to villages and rural areas”. Development is required in villages/settlements to ensure their sustainability. Walford is classed as an AONB, with such a large scale of housing development, it would spoil our heritage. Development on site 11 would cause further damage to Coughton Marsh, the draining of the land for the two reservoirs has already caused substantial damage to the marsh and protected wildlife. REDACTED who have now voted the development through for a smaller number of houses, having assured the Parishioners in a meeting that they would not approve any development on the Plot, This meeting was well attended with residents from throughout the parish. Development would cause considerable sound, light and environmental pollution to the surrounding properties during development. We have no confidence that planning on Site 11 will not then go through for a larger development that will then give access to a major Landowner to develop parts of his land, REDACTED. Walford Parish Council have employed an independent Consultant REDACTED. Further development would cause access in to Ross is becoming more of an issue through Copse Cross Street We believe that as residents of Walford Parish the proposals put forward by the Walford NDP Committee should be thrown out in its entirety and a public consultation carried out by Hereford Council should be undertaken.</p>

Helen de Pulford



To Whom it My Concern

Dear Sir or Madam

I wish to register my objection to Walford Neighbourhood Development Plan (NDP).

[REDACTED] it was just by sheer chance by talking to a neighbour I found out about the NDP proposals. Myself, along with several other residents [REDACTED] have received no notification or information regarding this matter. The way Howle Hill has been divided into three separate boundaries is absolutely appalling. The boundary of Howle Hill should include all the properties and not just a select few.

It has always stood that all the properties under the post code HR9 5SP have always been within the boundaries of Howle Hill.

Herefordshire Council recently stated in a Planning meeting that Howle Hill had been earmarked for development. If you look at the way Howle Hill has been carved up into three separate areas, there is absolutely no way that any development of any kind could take place. This cannot be right.

In a government white paper, it states "that towns and cities across the country cannot withstand much more development and that consideration should be given to villages and rural areas". It is not right how Howle Hill and the rest of the Parish of Walford has been divided up into segregated areas. Development is required in villages/settlements to ensure their sustainability.

The Parish of Walford needs development across the whole Parish, not just selected areas.

Hereford Council should organise a full, honest, and open public consultation for all the residents of Walford Parish to participate in.



## Neighbourhood Planning Team

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**From:** donotreply@herefordshire.gov.uk  
**Sent:** 28 August 2022 20:16  
**To:** Neighbourhood Planning Team  
**Subject:** Online form submitted: Comment on a proposed neighbourhood area

This message originated from outside of Herefordshire Council or Hoople. Please do not click links or open attachments unless you recognise the sender and know the content is safe.

### Comment on a proposed neighbourhood area

We have received the following form online. Reference: 843339

Question	Response
Address	REDACTED
Postcode	REDACTED
First name	Helen
Last name	Lindley
Which plan are you commenting on?	Walford Neighbourhood Development Plan
Comment type	Objection
Your comments	<p>This plan should be refused on the basis that it includes development on plot 11. This plot: 1 Is within the AONB 2 Will result in the loss of Prime Agricultural Land 3 Will risk further damage to Coughton Marsh, and cause substantial damage to the marsh and protected wildlife, 4. Will cause considerable sound, light and environmental pollution to the surrounding properties during development. Light pollution will increase long term. 5 Has already been the subject of much objection due to the fact that there is a lack of confidence that planning will not then go through for a larger development that will then give access to a major Landowner to develop parts of his land. REDACTED 6 Traffic issues in Ross town will increase as access in to Ross is becoming more of an issue through Copse Cross Street. Please consider requiring an amendment to the NDP to refuse any development on this plot which is currently outside of the development boundary.</p>





Historic England

Mr James Latham  
Herefordshire Council  
Neighbourhood Planning & Strategic Planning  
Plough Lane  
Hereford  
Herefordshire  
HR4 0LE

Direct Dial: 0121 625 6887

Our ref: PL00761563

9 August 2022

Dear Mr Latham

**WALFORD NEIGHBOURHOOD PLAN - REGULATION 16 CONSULTATION.**

Thank you for the invitation to comment on the Submission Neighbourhood Plan.

Historic England is supportive of both the content of the document and the vision and objectives set out in it.

Our previous comments on the Regulation 14 consultation remain entirely relevant, that is:

*“We particularly commend the thorough approach taken to identifying the distinctive local characteristics of the varying settlements of the Parish and the emphasis placed on the conservation of their local distinctiveness through good building design. The protection of locally significant buildings, farmsteads and landscape character including archaeological remains and important views is equally to be applauded.*

*The plan has an extremely sound evidence base that includes reference to the Herefordshire Council Historic Environment Record and County Landscape Character Assessment and it reads as a well-considered, concise and fit for purpose document which we consider takes a suitably proportionate but very thorough approach to the historic environment of the Parish”.*

Beyond those observations we have no further substantive comments to make on what Historic England considers is a good example of a community led plan.

I hope you find this advice helpful.

Yours sincerely,

P. Boland.

Peter Boland



THE FOUNDRY 82 GRANVILLE STREET BIRMINGHAM B1 2LH

Telephone 0121 625 6888  
HistoricEngland.org.uk





Historic England

Historic Places Advisor  
peter.boland@HistoricEngland.org.uk

cc:



THE FOUNDRY 82 GRANVILLE STREET BIRMINGHAM B1 2LH

Telephone 0121 625 6888  
HistoricEngland.org.uk



*Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.*

Name & Address:

James Cole



To Whom it My Concern

Dear Sir or Madam

I wish to register my objection to Walford Neighbourhood Development Plan (NDP).

I, along with a vast number of other residents of Walford Parish have received no notification or information regarding this matter. The way Walford Parish has been divided into segments is absolutely appalling. The way the new proposed boundaries are marked quite clearly shows that these have been drawn up to try and stop development, except for a few very select sites. This cannot be right.

As a Parish we need development on a limited scale and over a long period of time. This will ensure sustainability and enable the young people of the Parish to be able to afford to stay within the Parish.

In a government white paper, it states "that towns and cities across the country cannot withstand much more development and that consideration should be given to villages and rural areas". Development is required in villages/settlements to ensure their sustainability.

We believe that as residents of Walford Parish the proposals put forward by the Walford NDP Committee should be thrown out in its entirety and a public consultation carried out by Herford council

Many thanks

James Cole



## Neighbourhood Planning Team

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**From:** donotreply@herefordshire.gov.uk  
**Sent:** 16 August 2022 16:37  
**To:** Neighbourhood Planning Team  
**Subject:** Online form submitted: Comment on a proposed neighbourhood area

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### Comment on a proposed neighbourhood area

We have received the following form online. Reference: 841000

Question	Response
Address	REDACTED
Postcode	REDACTED
First name	Janine
Last name	Liddle
Which plan are you commenting on?	Walford Parish Council
Comment type	Objection
Your comments	<p>The Parish Council originally rejected a development on plot 11 after considerable local objection around 100 parishioners attended the meeting. The owner of the plot wanted 44 houses , he then reduced it to 22 which was rejected in this meeting, he then resubmitted 3 houses which again the locals objected to as its a large field near a protected habitat REDACTED. The plans for the 3 houses still give the opportunity for this to go ahead. REDACTED.</p> <p>Kind Regards</p>

Mrs Jayne Jordan

16<sup>th</sup> August 2022

To: Samantha Banks – Neighbourhood Development Manager

Reference – Walford NDP Proposals

Dear Samantha

I wish to register my objection to the proposals put forward by the Walford Parish Council NDP Committee.

The way that they are proposing to segregate the Parish of Walford is totally wrong. The Parish as a whole need's development, not just in selected areas. Take Howle Hill [REDACTED] [REDACTED] They are proposing to split it into three segments. This is an absolute joke! I can quite clearly see that this has been proposed to stop development, when Howle Hill has been highlighted by Herefordshire County Council for development.

The whole of Howle Hill share the same post code – HR9 5SP, so surely the whole of that post code area should be within the building development boundaries. Yet, if you look at the proposed boundary lines it is only a very select few houses that are covered, [REDACTED]

As I understand [REDACTED] is a member of Walford NDP Committee and has had a great deal of input into the proposals by Walford NDP. [REDACTED]

The Consultant Walford NDP Committee employed, Mr Bill Bloxham, openly admitted in a Zoom meeting, of which we have a recording, that he had given Walford NDP Committee advice and recommendations on the sites to be put forward to the public [REDACTED]

In 2017 ACOM carried out a draft sight assessment report. Their findings and what is proposed now are entirely different. ACOM are a totally independent body. With all this in mind, can you please dismiss the finding of the Walford NDP [REDACTED]

The Walford NDP have been very clever and selective of where they have advertised any of the meeting held. This is proved by the very low number public that attended the individual meeting.

Several residents have also stated that when the asked the then Clerk of Walford Parish Council – Dave Berry – for information packs regarding the proposals they were told he had not got time to deal with their request and would have to wait. Consequently no information packs were sent out.

Yours sincerely

A solid black rectangular box used to redact the signature of Jayne Jordan.

JAYNE JORDAN

## Neighbourhood Planning Team

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**From:** donotreply@herefordshire.gov.uk  
**Sent:** 31 August 2022 21:53  
**To:** Neighbourhood Planning Team  
**Subject:** Online form submitted: Comment on a proposed neighbourhood area

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### Comment on a proposed neighbourhood area

We have received the following form online. Reference: 843998

Question	Response
Address	REDACTED
Postcode	REDACTED
First name	John
Last name	Kendrick Ltd
Which plan are you commenting on?	Walford NDP
Comment type	Support
Your comments	Support for the settlement boundary as drawn On behalf of numerous local residents in the Howle Hill area The Plan should constrain any new residential proposals outside of the current settlement boundary of Howle Hill due to lack of sustainability and also highways access/egress difficulties together with known drainage problems . There are no local facilities with regard to Howle Hill and the settlement boundary should therefore be only drawn around the existing nucleus of dwellings. There are no services whatsoever to support new speculative residential development. Any intrusion in line with long established government guidance into the open countryside should be resisted. The area generally cannot accommodate increased residential pressure,and particularly makeup alleged arithmetically calculated deficiencies in growth when the LPA has well above a 5-year housing land supply and buffer. There should be a new Policy which states that new residential development will only be assessed if necessary , on Brown Field or previously developed sites.

Question	Response
Address	REDACTED
Postcode	REDACTED
First name	John
Last name	Woolston
Which plan are you commenting on?	Walford Neighbourhood Development Plan
Comment type	Comment
Your comments	<p>Having viewed the Regulation 16 version of the plan at the recent 'open evening' held at Bishopswood village hall my wife and I would like to register the following comments.</p> <p>There is a disproportionate number of potential new developments/houses in the Bishopswood area compared to the numbers in other identified areas. If all the developments in this area are realised it will increase the number of houses in this area by around 30% . This is disproportionate in comparison with the increases in other locations. The philosophy behind the development of the plan was to spread the new housing across the whole area . A large element has been focused on Bishopswood, this doesn't follow the spirit of the philosophy. The concentration of development on Bishopswood will exacerbate a number of existing problems. These include: the problems with the junction of Leys Hill with the the B4234 which has been the source of a number of representations in the past. Leys Hill is the only access route for much of the construction traffic for these developments. There have been several instances of road blockages, damage to the road and attempts by vehicles that are just too large to use Leys Hill. The whole of Bishopswood area does not have access to mains drainage, there will be a need for significant levels of sewage treatment to deal with the effluent from the se new developments several of which are clusters of up to 9 houses. In summary there are too many potential new houses proposed for this area, their introduction will potentially change the nature of the existing village and introduce a population load that local infrastructure is unable to sustain.</p>



## Neighbourhood Planning Team

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**From:** Banks, Samantha  
**Sent:** 19 August 2022 16:12  
**To:** Neighbourhood Planning Team  
**Subject:** FW: Walford Parish National Development Plan submission

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

From: REDACTED  
Sent: 19 August 2022 16:04  
To: Banks, Samantha <Samantha.Banks2@herefordshire.gov.uk>  
Subject: Walford Parish National Development Plan submission

This message originated from outside of Herefordshire Council or Hoople. Please do not click links or open attachments unless you recognise the sender and know the content is safe.

FAO: Samantha Banks (Neighbourhood Planning Manager)

Dear Ms Banks,

I am writing to register my opposition to proposals which will result in large housing developments in Walford. The original submission by the landowner for NDP Site 11 was for 40+ houses. Site 11 is adjacent to Site 21, where 120+ houses were proposed.

Site 21 is currently not being recommended by Walford NDP, due to its lack of access to the Walford Road. The revised Site 11 proposal called for 19 houses, after residents voiced strong objections. Walford Parish Council then voted unanimously to reject the proposed 19 houses, and Site 11 was not recommended by Walford NDP.

This decision was welcomed by the large group of residents who believed their views had at last been acted upon. This decision also reflected the survey results conducted by the Parish Council, where 80% of residents rejected the idea of large developments in the Parish.

Unfortunately, the landowner for Site 11 chose to change the proposal for a second time, and reduced the number of houses to 5. This was passed by Walford Parish Council at an "Extraordinary" meeting, following representations REDACTED. Many residents would question the conclusion of the Council, and what actually led to this decision being reversed.

REDACTED.

The access to the Walford Road is the all-important factor here. Regardless of whether Site 11 is approved for 5 houses or some other number, the access, if granted, allows both Sites 11 and 21 to return to planning to try to achieve their objectives.

It would be naive to think that REDACTED. If this planning were to be granted, Walford would almost certainly finish up with a large housing development on Site 11. It is also likely that a further large development would take place on Site 21.

I would urge you to seek answers from Walford Parish Council about their whole approach to both Site 11 and Site 21.

There are many reasons why large housing developments would be inappropriate for Walford. I feel sure that you will be aware already of these reasons, so I won't attempt to list them here. I remain hopeful that Herefordshire Council will now research this matter fully.

Kind regards,

Keith Hunt

## Neighbourhood Planning Team

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**From:** donotreply@herefordshire.gov.uk  
**Sent:** 30 August 2022 13:13  
**To:** Neighbourhood Planning Team  
**Subject:** Online form submitted: Comment on a proposed neighbourhood area

This message originated from outside of Herefordshire Council or Hoople. Please do not click links or open attachments unless you recognise the sender and know the content is safe.

### Comment on a proposed neighbourhood area

We have received the following form online. Reference: 843613

Question	Response
Address	REDACTED
Postcode	REDACTED
First name	Lyn and Fred
Last name	Mills
Which plan are you commenting on?	Walford
Comment type	Support
Your comments	We do support the NDP and all the effort it has taken to produce it. However please could the settlement boundary line on Church Road be brought back to the dead end sign. We are sure it never used to go as far out as is currently shown. It does make sense to be brought back because the road is a dead end and gradually gets worse before it comes to a stop leading to woodlands and horse bridleways. There have been so many incidences of vehicles causing damage and getting stuck. It is all open countryside and we are very much on the outskirts in this part.

## Neighbourhood Planning Team

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**From:** donotreply@herefordshire.gov.uk  
**Sent:** 24 August 2022 15:00  
**To:** Neighbourhood Planning Team  
**Subject:** Online form submitted: Comment on a proposed neighbourhood area

This message originated from outside of Herefordshire Council or Hoople. Please do not click links or open attachments unless you recognise the sender and know the content is safe.

### Comment on a proposed neighbourhood area

We have received the following form online. Reference: 842670

Question	Response
Address	REDACTED
Postcode	REDACTED
First name	margaret
Last name	bate
Which plan are you commenting on?	Walford
Comment type	Support
Your comments	Thank you to the NDP team for drafting such a superb document and I really appreciate all the effort and time they have taken to do this. The area for Church Road extends into open countryside and farm land. I feel that the settlement boundary line should be brought back to the dead end sign. We are not the centre or part of the main built up form of this settlement. The recent regulatory and committee decision reached the verdict that the site next to the settlement boundary line was RA3 open countryside with highway safety issues due to the dead end narrow lane and not suitable for development.. It is just not suitable or sustainable to build in open countryside here.

Question	Response
Address	REDACTED
Postcode	REDACTED
First name	Marion
Last name	Corbett
Which plan are you commenting on?	Walford Parish NDP
Comment type	Comment
Your comments	<p>With regards to Howle Hill; 1) Please remove the word village from the title of Howle Hill village Policies Map to either settlement or hamlet Map. Howle Hill is not a village and has not been identified as a village. It has been throughout the NDP document referred to as either a settlement or hamlet 2) A recent planning application (P204443/O) has identified an area of Priority Habitat which is shown on the Magic Map but because the area is under 0.25 hectares the fact it forms a small strip of Ancient &amp; Semi-natural Woodland (ASNW) is not and the Priority Habitats do not feature on the NDP maps for some reason. Nor is this listed on Council documents. Therefore now that the ASNW has been identified the NDP would be the appropriate place thus helping to protect and preserve it - WALF6. Ancient woodlands are irreplaceable and protected, no matter their size. Both the Forestry Commission and Herefordshire Council's own Ecologist, along with the applicant's own ecologist, acknowledge this and the site itself triggered a Habitat Risk Assessment (H.R.A). 3) The same recent planning application (P204443/O) via the Council's own ecologist (condensed), has identified that the eastern part of Howle Hill in the Church Road no through road, where the Area of Outstanding Natural Beauty (AONB) also begins, falls within the Bailey Brook catchment of the River Wye Special Area of Conservation (SAC); a habitat recognised under the Habitats Regulations, (The Conservation of Habitats and Species Regulations 2017, as amended by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019' (the 'Habitats Regulations')) as being of international importance for its aquatic flora and fauna. The SAC is notified at a national level as the River Wye Site of Scientific Interest (SSSI). Yet there is no mention of the Bailey Brook catchment only the Castle Brook catchment, please amend accordingly. Also the Walford Environmental Report May 2022, shows Howle Hill has access to mains drainage on the third answer down under River Wye (including the River Lugg) SAC: – this is incorrect. Howle Hill has no mains drainage and has no access to mains drainage. The same document states there are no conservation areas within the Parish – see evidence above at 3). The ASNW at 2) above, feature nowhere on these documents, hence it's important that they at least</p>

feature on the Parish documents. The many other mistakes re Howle Hill and the scoring have already been sent direct to Common Place. Overall I commend the work, personal time and effort that those who worked on the Walford NDP have contributed. Thanks.

Question	Response
Address	REDACTED
Postcode	REDACTED
First name	Marion
Last name	Corbett
Which plan are you commenting on?	Walford Parish NDP
Comment type	Comment
Your comments	<p>Hi, any comment I've made previously ( 835491) and now is in support of The NDP and the hard work that's gone into it. I believe that without the NDP Walford Parish would become a housing estate. My comment this time is more of a suggestion or observation after the refusal of the recent planning application P204443/O, The Land Adjacent to the Old Kilns. The Planning and Regulatory Committee members couldn't believe the site had even been put before them and said it was in their experience the worst site they had ever been to. The refusal states," the site lies outside the settlement boundary as defined in Walford Neighbourhood Development Plan, as such the site is considered to be in an open countryside location and is not well related to the main built up form of Howle Hill", it also comments that the site represents an unsustainable form of development, rural location, no transport links, lack of services and use of private car is a must and the meeting itself commented on the narrowness of the road here and road safety issues with people jumping into hedges etc. In view of this refusal under Policies WALF4 and WALF20 of the NDP, RA2, RA3 and LD1 of the Core Strategy, and the NPPF, I suggest a rethink of the settlement boundary in the No Through Road of Church Lane, that covered this site. Removing the boundary completely from this dead end road, with it especially being unsustainable, not well related to the main built up form of Howle Hill and RA3, It's clearly not needed, perhaps taking it back to the Unsuitable for HGV sign or further? Anyway I leave it for you to discuss with the experts that advise the NDP group. Many thanks.</p>

Question	Response
Address	REDACTED
Postcode	REDACTED
First name	Mark
Last name	Lindley
Which plan are you commenting on?	Walford Neighbourhood Development Plan
Comment type	Objection
Your comments	<p>The plan now includes an outline for a reduced number of house on Plot 11. The landowner originally wanted 44 houses, which was then reduced to 22 then reduced again for this smaller development. REDACTED. Another concern, is REDACTED. These sites should be refused on the basis that: 1 They are within the AONB 2 They will result in the loss of Prime Agricultural Land needed to feed the country and reduce carbon production from the importing of food 3 There will be further damage to Coughton Marsh, the draining of the land for the two reservoirs has already caused substantial damage to the marsh and protected wildlife, 4. There is a lack of trust in the Parish Council, who have now voted the development through for a smaller number of houses, having assured the Parishioners in a meeting that they would not approve any development on the Plot, This meeting was well attended with residents from throughout the parish raising objections. 5. There will be considerable sound, light and environmental pollution to the surrounding properties during development. Light pollution will increase long term. 6 There is a lack of confidence that planning will not then go through for a larger development that will then give access to a major Landowner to develop parts of his land. REDACTED. 7 The NDP committee included an 'independent' Consultant REDACTED. 8 Traffic issues in Ross town will increase as access in to Ross is becoming more of an issue through Copse Cross Street. In short, the process undertaken by the NDP committee is flawed, does not represent the views of the community and has no protections against escalation of the development into larger scale housing for which Walford is not a logistically sound proposition.</p>



## Neighbourhood Planning Team

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**From:** donotreply@herefordshire.gov.uk  
**Sent:** 21 July 2022 11:25  
**To:** Neighbourhood Planning Team  
**Subject:** Online form submitted: Comment on a proposed neighbourhood area

This message originated from outside of Herefordshire Council or Hoople. Please do not click links or open attachments unless you recognise the sender and know the content is safe.

### Comment on a proposed neighbourhood area

We have received the following form online. Reference: 835237

Question	Response
Address	REDACTED
Postcode	REDACTED
First name	Matt
Last name	Walker
Which plan are you commenting on?	Policy WALF17: Design and Appearance
Comment type	Comment
Your comments	REDACTED site 11R and we would respectfully ask that a line regarding construction of dwellings taking into account privacy be added to the policy. Windows should not overlook these properties as the main living areas are to the rear and not the front.

Date: 24 August 2022  
Our ref: 402689  
Your ref: None



James Latham  
Herefordshire Council

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

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

T 0300 060 3900

## BY EMAIL ONLY

Dear Mr Latham

### Walford Neighbourhood Development Plan – Regulation 16 consultation

Thank you for your consultation on the above dated 06 July 2016 which was received by Natural England on the same date.

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

### River Wye Special Area of Conservation

The Walford Neighbourhood Plan area is within the catchment of the [River Wye Special Area of Conservation \(SAC\)](#), which is a European designated site (also commonly referred to as Natura 2000 sites), and therefore has the potential to affect its interest features. European sites are afforded protection under the Conservation of Habitats and Species Regulations 2017, as amended (the 'Habitats Regulations'). The SAC is notified at a national level as the [select] [River Wye Site of Scientific Interest \(SSSI\)](#).

An appropriate assessment has been undertaken, in accordance with Regulation 63 of the Conservation of Species and Habitats Regulations 2017 (as amended). Natural England is a statutory consultee on the appropriate assessment stage of the Habitats Regulations Assessment process, and a competent authority should have regard to Natural England's advice.

The appropriate assessment concludes that the plan has no adverse effect on the integrity of the SAC. Natural England agrees with this conclusion.

We note that the Neighbourhood Plan includes a requirement for nutrient neutrality, in the event that the River Wye is found to be failing to meet its favourable conservation status in the future. Natural England supports this stance and we welcome the future-proofing of the plan.

Policy WALF6: Enhancement of the Natural Environment states:

*In the event that the integrity of the Lower River Wye catchment is found to be failing to meet its favourable conservation status, planning permission will only be granted where it is shown that the proposal will not increase nutrient inputs into the SAC. This could include through the delivery of mitigation to make a proposal nutrient neutral. Reference should be made to Herefordshire Council's Phosphate calculator and associated guidance.*

The reasoned justification explains:

*5.5 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 Lower Wye sub-catchment, within which Walford Parish sits, is not currently in that position, a 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 that the sub-catchment finds itself in a position where it may fail in ecological terms at some stage in the future. In addition to complying with Local Plan Core Strategy policy LD2, this policy also supports Local Plan Core Strategy policies SD3, SD4, LD1, and LD3.*

### **Wye Valley and Forest of Dean Bat sites SAC and Wye Valley Woodlands SAC**

The Walford Neighbourhood Plan area is 3.24 miles (5km) from the Wye Valley and Forest of Dean Bat SAC) which is a European designated site, and therefore has the potential to affect its interest features. European sites are afforded protection under the Conservation of Habitats and Species Regulations 2017 (as amended), the 'Habitats Regulations'. It is 7.04 miles from the Wye Valley Woodlands SAC.

Natural England agrees with the conclusion of the HRA that there will be no adverse effects on the integrity of these sites resulting from this plan.

### **Policy WALF6: Enhancement of the Natural Environment**

Natural England welcomes the inclusion of this very positive policy.

I hope this response is of assistance. Please send further correspondence, marked for my attention, to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk) quoting our reference above.

Yours sincerely

Hayley Fleming  
West Midlands Area Team

## Neighbourhood Planning Team

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**From:** donotreply@herefordshire.gov.uk  
**Sent:** 22 August 2022 02:53  
**To:** Neighbourhood Planning Team  
**Subject:** Online form submitted: Comment on a proposed neighbourhood area

This message originated from outside of Herefordshire Council or Hoople. Please do not click links or open attachments unless you recognise the sender and know the content is safe.

### Comment on a proposed neighbourhood area

We have received the following form online. Reference: 841935

Question	Response
Address	REDACTED
Postcode	REDACTED
First name	Nesta
Last name	Hirst
Which plan are you commenting on?	Walford NDP
Comment type	Objection
Your comments	I object to any further developments in Walford which would add to the traffic chaos which is Copse Cross Street. Also ingress into Coughton marsh will inevitably lead to loss of habitat and disruption to plant and animal life.

## Neighbourhood Planning Team

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**From:** PRIMARYCARE, Hw (NHS HEREFORDSHIRE AND WORCESTERSHIRE ICB - 18C)  
<hw.primarycare@nhs.net>  
**Sent:** 27 July 2022 16:25  
**To:** Neighbourhood Planning Team  
**Subject:** FW: Walford Regulation 16 submission neighbourhood development plan consultation

This message originated from outside of Herefordshire Council or Hoople. Please do not click links or open attachments unless you recognise the sender and know the content is safe.

Thank you for notifying NHS Herefordshire & Worcestershire Integrated Care Board (ICB) of the Walford Parish Council's Regulation 16 Neighbourhood Development Plan (NDP) submission for consultation.

NHS Herefordshire & Worcestershire ICB has no direct comment on the plan, but welcomes the policy (WALF16) promoting the development of high-speed broadband, mobile communications and other communications which are of benefit to the provision of healthcare into rural communities.

### Primary Care Team

NHS Herefordshire and Worcestershire

[Hw.primarycare@nhs.net](mailto:hw.primarycare@nhs.net)



Proud to be a part of  
Herefordshire and Worcestershire Integrated Care System

## Neighbourhood Planning Team

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**From:** Banks, Samantha  
**Sent:** 18 August 2022 07:53  
**To:** Neighbourhood Planning Team  
**Subject:** FW: Walford NDP

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**From:** Rachel Llewellyn  
**Sent:** 17 August 2022 19:24  
**To:** Banks, Samantha <Samantha.Banks2@herefordshire.gov.uk>  
**Subject:** Walford NDP

This message originated from outside of Herefordshire Council or Hoople. Please do not click links or open attachments unless you recognise the sender and know the content is safe.

Rachel Llewellyn

REDACTED

Dear Sir/Madam

I wish to register my objection to Walford Neighbourhood Development Plan (NDP).

I, along with a vast number of other residents of Walford Parish have received no notification or information regarding this matter. The way Walford parish has been divided into segments is absolutely appalling. The way the new proposed boundaries are marked quite clearly shows that these have been drawn up to try and stop development, except for a few select sites. This simply cannot be right.

As a parish we need development on a limited scale and over a long period of time. This will ensure sustainability and enable the young people of the parish to be able to stay within the parish.

In a government white paper it states 'towns and cities across the country cannot withstand much more development and that consideration should be given to villages and rural areas'. Development is required in villages/settlement to ensure their sustainability.

We believe that as residents of Walford Parish the proposals put forward by the Walford NDP committee should be thrown out in its entirety and a public consultation carried out by Hereford Council should be undertaken.

REDACTED. I think the proposal is disgraceful and that REDACTED generations to come should have the opportunity to live in our much loved parish. REDACTED.

The fact the Walford NDP have been so selective over their meeting advertisement and information willing to share REDACTED. Even the proposal of REDACTED and with no care or thought to anyone else in the parish.

Many Thanks  
Rachel Llewellyn

Question	Response
Address	REDACTED
Postcode	REDACTED
First name	Richard
Last name	Francis
Which plan are you commenting on?	Walford
Comment type	Objection
Your comments	<p>Dear Sir or Madam, I wish to register my objection to Walford Neighbourhood Development Plan (NDP). I, along with a vast number of other residents of Walford Parish have received no notification or information regarding this matter. As a Parish we need development on a limited scale and over a long period of time. This will ensure sustainability and enable the young people of the Parish to be able to afford to stay within the Parish. In a government white paper, it states “that towns and cities across the country cannot withstand much more development and that consideration should be given to villages and rural areas”. Development is required in villages/settlements to ensure their sustainability. Walford is classed as an AONB, with such a large scale of housing development, it would spoil our heritage. Development on site 11 would cause further damage to Coughton Marsh, the draining of the land for the two reservoirs has already caused substantial damage to the marsh and protected wildlife. We REDACTED, who have now voted the development through for a smaller number of houses, having assured the Parishioners in a meeting that they would not approve any development on the Plot, This meeting was well attended with residents from throughout the parish. Development would cause considerable sound, light and environmental pollution to the surrounding properties during development. We have no confidence that planning on Site 11 will not then go through for a larger development REDACTED. REDACTED. Walford Parish Council have employed an independent Consultant who REDACTED. Further development would cause access in to Ross is becoming more of an issue through Copse Cross Street We believe that as residents of Walford Parish the proposals put forward by the Walford NDP Committee should be thrown out in its entirety and a public consultation carried out by Hereford Council should be undertaken.</p>

## Neighbourhood Planning Team

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**From:** donotreply@herefordshire.gov.uk  
**Sent:** 16 August 2022 20:22  
**To:** Neighbourhood Planning Team  
**Subject:** Online form submitted: Comment on a proposed neighbourhood area

This message originated from outside of Herefordshire Council or Hoople. Please do not click links or open attachments unless you recognise the sender and know the content is safe.

### Comment on a proposed neighbourhood area

We have received the following form online. Reference: 841048

Question	Response
Address	REDACTED
Postcode	REDACTED
First name	Robert
Last name	Hazelwood
Which plan are you commenting on?	Walford Parish development plot 11
Comment type	Objection
Your comments	Objection against plot 11 for development in Walford. The air is amongst AONB, plus its prime agricultural land so loss of valuable grown produce, taking a relatively quiet village to adding more noise, traffic which the road network isnt capable of adding the extent which this new development would bring with the high number of houses proposed to be built. Loss of wildlife especially to Coughton Marsh and surrounding areas and wetlands. Due to the size of the village there isnt enough infrastructure to cope with more homes and residents.



Name & Address:

Mrs S Pratt



To Whom it My Concern

Dear Sir or Madam

I wish to register my objection to Walford Neighbourhood Development Plan (NDP).

I, along with a vast number of other residents of Walford Parish have received no notification or information regarding this matter. The way Walford Parish has been divided into segments is absolutely appalling. The way the new proposed boundaries are marked quite clearly shows that these have been drawn up to try and stop development, except for a few very select sites. This cannot be right.

As a Parish we need development on a limited scale and over a long period of time. This will ensure sustainability and enable the young people of the Parish to be able to afford to stay within the Parish.

In a government white paper, it states "that towns and cities across the country cannot withstand much more development and that consideration should be given to villages and rural areas". Development is required in villages/settlements to ensure their sustainability.

We believe that as residents of Walford Parish the proposals put forward by the Walford NDP Committee should be thrown out in its entirety and a public consultation carried out by Hereford Council should be undertaken.

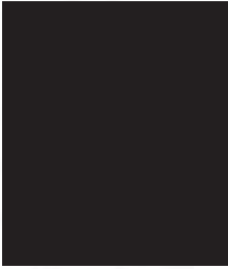
Signed.....



.....

Name & Address:

Sandra Cole



To Whom it My Concern

Dear Sir or Madam

I wish to register my objection to Walford Neighbourhood Development Plan (NDP).

I, along with a vast number of other residents of Walford Parish have received no notification or information regarding this matter. The way Walford Parish has been divided into segments is absolutely appalling. The way the new proposed boundaries are marked quite clearly shows that these have been drawn up to try and stop development, except for a few very select sites. This cannot be right.

As a Parish we need development on a limited scale and over a long period of time. This will ensure sustainability and enable the young people of the Parish to be able to afford to stay within the Parish.

In a government white paper, it states "that towns and cities across the country cannot withstand much more development and that consideration should be given to villages and rural areas". Development is required in villages/settlements to ensure their sustainability.

We believe that as residents of Walford Parish the proposals put forward by the Walford NDP Committee should be thrown out in its entirety and a public consultation carried out by Herford council

Many thanks

Sandra Cole



Question	Response
Address	REDACTED
Postcode	REDACTED
First name	Sarah
Last name	Curtis
Which plan are you commenting on?	Walford
Comment type	Support
Your comments	<p>I would like to support the Walford NDP and can see a lot of work has gone into it. I note policy WALF6 with regard to Enhancement of the Natural Environment is to include sites identified in the ‘Priority Habitat Inventory’ There is a special conservation area consisting of a band of deciduous ancient woodlands under 0.25 hectares so are not shown on council maps. This protected habitat area has been identified by Natural England in their inventory as a ‘Priority Habitat’ under Herefordshire’s Biodiversity Plan. These woodlands form an important habitat for the wildlife in this area which include lizards, bats, hedgehogs badgers and the rare white marble butterfly which has been spotted. This area is not shown on MAP 11. I feel it should be afforded the protection that it deserves. Just because this area is not shown on council maps does not mean it does not exist. It does exist and has been identified in a current planning application (P204443/0) as such by the ecologist and the Forestry Commission. As a special area of conservation it attracts a score of minus 15 on the Herford Council Rural area settlement hierarchy system. Please can it be included on Map 11 or preferably a new, clearer map used because Map 11 is very difficult to see even with glasses and a magnifying glass. There is also no reference to the Bailey Brook catchment of the River Wye Special Area of Conversation as recognised under the Habitats regulations. Please can this be included.</p>

## Neighbourhood Planning Team

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**From:** donotreply@herefordshire.gov.uk  
**Sent:** 22 August 2022 16:56  
**To:** Neighbourhood Planning Team  
**Subject:** Online form submitted: Comment on a proposed neighbourhood area

This message originated from outside of Herefordshire Council or Hoople. Please do not click links or open attachments unless you recognise the sender and know the content is safe.

### Comment on a proposed neighbourhood area

We have received the following form online. Reference: 842121

Question	Response
Address	REDACTED
Postcode	REDACTED
First name	Sarah
Last name	CURTIS
Which plan are you commenting on?	Walford
Comment type	Support
Your comments	<p>I would like to add my support to the NDP and commend all the hard work that has gone into it to produce a document that has evolved with local input. My only comment is that it makes sense to bring back the settlement boundary line on Church Road to end at the dead-end sign because after this sign it is open countryside on a dead end lane that is not the entrance to the hamlet but on the periphery. The cluster for this area appears as the largest when it is not the centre of the hamlet or part of the main built-up form. The council tractor after trimming the hedges stops at the dead end sign as due to the narrowness of the lane after this point it can go no further. Recently a planning and regulatory committee decision has been made that the area adjacent to the current settlement boundary line is not suitable for development in the open countryside due to it being unsustainable with poor access on a single track dead end lane. The area being defined as RA3. This part of the hamlet is open countryside and the historical buildings of the church, the school house and pub have long been private residences for many years. It would not be appropriate to build in open countryside and farmland so I believe the settlement boundary line should stop at the dead-end sign.</p>

Question	Response
Address	REDACTED
Postcode	REDACTED
First name	Sophie Jessica
Last name	Curtis
Which plan are you commenting on?	Walford
Comment type	Support
Your comments	<p>I support the NDP plan and appreciate the time that people have put into it. I REDACTED and I don't feel that this road can cope with any more traffic. A recent decision has been made by the regulatory and planning committee that this area is not sustainable with poor access and therefore not suitable for development. I agree with this because REDACTED dead end and there have already been a few near misses and people dice with their lives as they jump into hedges to avoid collisions because there are no passing paces and the road is so narrow. The verges have great gouges in them. In winter it is even worse with black ice in places. I recall ambulances getting stuck and as this is a dead end there is no other way out. Once the power lines were taken down by a vehicle and part of the road was shut off for days. This is open country side and farm land. Please can the settlement line be taken back to stop at the dead end sign as after this point the lane gets worse and these are when the traffic problems and damage to properties occur. Eventually you reach a point if you are a large vehicle that you cannot turn around and one incident resulted in huge costly damage to a resident's driveway. We have no bus service here so everyone is dependent on motor vehicles. Being a hilltop location cycling is not an option either to return up a steep hill with shopping and then try and manoeuvre safely through a dead end narrow lane with blind bends. There are no cycle paths or pavements. It just does not bear thinking about.</p>

## Neighbourhood Planning Team

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**From:** Planning Central <Planning.Central@sportengland.org>  
**Sent:** 02 August 2022 12:04  
**To:** Neighbourhood Planning Team  
**Subject:** 2022 Walford Neighbourhood plan

This message originated from outside of Herefordshire Council or Hoople. Please do not click links or open attachments unless you recognise the sender and know the content is safe.

Thank you for consulting Sport England on the above neighbourhood plan.

Government planning policy, within the **National Planning Policy Framework** (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.

It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 98 and 99. It is also important to be aware of Sport England's statutory consultee role in **protecting playing fields** 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.

[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)

Sport England provides guidance on **developing planning policy** for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded.

[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)

Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 99 of the NPPF, this takes the form of **assessments of need and strategies for indoor and outdoor sports facilities**. 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 specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.

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.

<http://www.sportengland.org/planningtoolsandguidance>

If **new or improved sports facilities** are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes.

<http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/>

Any **new housing** developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities

resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.

In line with the Government’s NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how **any new development**, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England’s Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.

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.

NPPF Section 8: <https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities>

PPG Health and wellbeing section: <https://www.gov.uk/guidance/health-and-wellbeing>

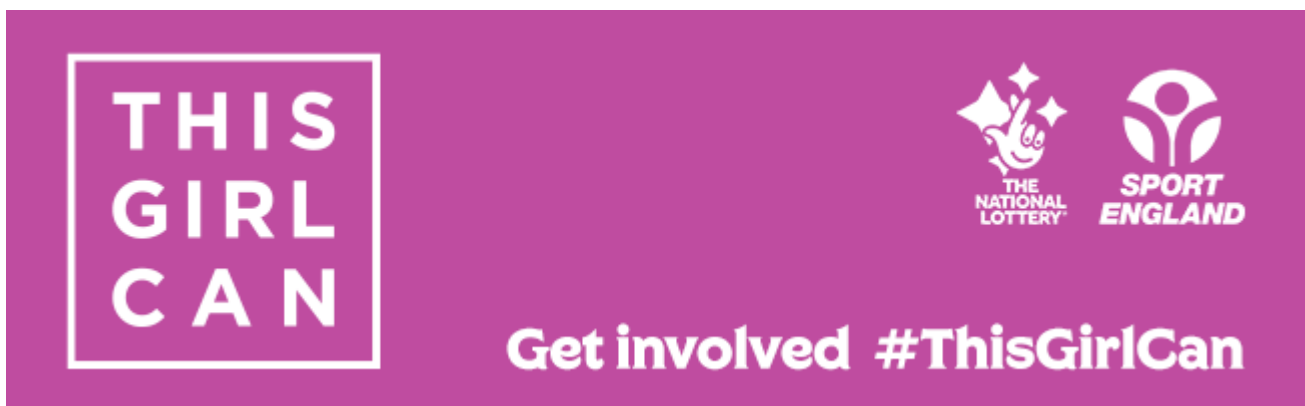
Sport England’s Active Design Guidance: <https://www.sportengland.org/activedesign>

*(Please note: this response relates to Sport England’s planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.)*

If you need any further advice, please do not hesitate to contact Sport England using the contact details below.

Yours sincerely

Planning Administration Team  
[Planning.Central@sportengland.org](mailto:Planning.Central@sportengland.org)



Sport Park, 3 Oakwood Drive, Loughborough, Leicester, LE11 3QF



We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our [website](#), and our Data Protection Officer can be contacted by emailing [Gaile Walters](#)

Name & Address:

Tiaunna Ormond



To Whom it My Concern

Dear Sir or Madam

I wish to register my objection to Walford Neighbourhood Development Plan (NDP).

I, along with a vast number of other residents of Walford Parish have received no notification or information regarding this matter. The way Walford Parish has been divided into segments is absolutely appalling. The way the new proposed boundaries are marked quite clearly shows that these have been drawn up to try and stop development, except for a few very select sites. This cannot be right.

As a Parish we need development on a limited scale and over a long period of time. This will ensure sustainability and enable the young people of the Parish to be able to afford to stay within the Parish.

In a government white paper, it states "that towns and cities across the country cannot withstand much more development and that consideration should be given to villages and rural areas". Development is required in villages/settlements to ensure their sustainability.

We believe that as residents of Walford Parish the proposals put forward by the Walford NDP Committee should be thrown out in its entirety and a public consultation carried out by Herford council

Many Thanks

Tiaunna Ormond





## Neighbourhood Planning Team

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**From:** donotreply@herefordshire.gov.uk  
**Sent:** 31 August 2022 20:47  
**To:** Neighbourhood Planning Team  
**Subject:** Online form submitted: Comment on a proposed neighbourhood area

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### Comment on a proposed neighbourhood area

We have received the following form online. Reference: 843984

Question	Response
Address	REDACTED
Postcode	REDACTED
First name	Timothy
Last name	Pople
Which plan are you commenting on?	Howle Hill
Comment type	Support
Your comments	<p>I think the NDP is broadly a good thing, as it should help ensure only appropriate development is allowed. REDACTED. I was somewhat surprised to see just how far it is intended to allow development as I thought the settlement ended at the Howle Hill end of the lane, It think if anything the area should be reduced in the no though road area particularly. As long time horse rider who has enjoyed fairly safe and easy access along Church Lane into open countryside via bridle paths added volume of traffic would be both dangerous and totally inappropriate I believe. In particular, the massive increase in delivery vans locally is creating a major hazard to horse riders and any further increase in traffic volume can only make things worse</p>

## Neighbourhood Planning Team

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**From:** donotreply@herefordshire.gov.uk  
**Sent:** 16 August 2022 20:33  
**To:** Neighbourhood Planning Team  
**Subject:** Online form submitted: Comment on a proposed neighbourhood area

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### Comment on a proposed neighbourhood area

We have received the following form online. Reference: 841052

Question	Response
Address	REDACTED
Postcode	REDACTED
First name	Tina
Last name	Allingham
Which plan are you commenting on?	Walford NDP
Comment type	Comment
Your comments	I fully understand the need for more housing and do not oppose the proposed small developments but remain concerned that building small developments on the fields in the village will open the gates for larger ones in the future Walford has no shop only a pub and a village hall and church with no other amenities, has low light and noise pollution and the diverse wildlife is thriving. Large developments will impact on all areas of village life and will have a detrimental impact on wildlife and the environment.



The Clerk  
Walford Parish Council  
clerk@walford-pc.org.uk

21<sup>st</sup> July 2022

**By Email only**

Dear Sir/Madam,

**Walford Regulation 16 Draft Neighbourhood Development Plan**  
**Consultation response on behalf of MF Freeman Ltd**

Tompkins Thomas Planning is instructed by Mr R Cordina of MF Freeman Ltd to prepare this letter in response to the Regulation 16 public consultation associated with the Walford Draft Neighbourhood Development Plan (NDP). MF Freeman submitted a number of potential housing sites for consideration during the Housing Sites Assessment and is pleased to see that two of those; namely 'Land on the North side of Leys Hill' and 'Land off Watling Street' remain included as proposed allocations.

We therefore support the Regulation 16 NDP's continued inclusion of these two sites and reaffirm the benefits that would derive from allocating the land for housing in the NDP and how development here would contribute to fulfilment of the Draft NDP's stated Vision and Objectives and the attainment of sustainable development overall. These were expressed in our Regulation 14 correspondence and we don't repeat them here. We can, however, provide assurance that MF Freeman is intent on bringing development forward on these sites.

However, and as explained at the Regulation 14 stage, we'd recommend that the definition of the settlement boundary for Howle Hill is further amended to include the site that is already beneficiary of detailed planning permission (172215/211348 refers). We note that the site of the nursery has been included and can see no reason why the settlement boundary should not be extended to include MF Freeman's site. Non-inclusion of the site is contrary to Herefordshire Council's stated guidance on the matter as per Neighbourhood Planning Guidance Note 20 – Guide to Settlement Boundaries. Given an extant, detailed planning

permission exists, we'd require justification for the continued exclusion of this land from the settlement boundary for Howle Hill. We do not consider fear for the loss of the 2 no. low-cost units via a new application to represent such justification.

We hope this is of assistance, but please do not hesitate to contact us directly should there be any points of clarification.

Yours sincerely,

Tompkins Thomas Planning



## Neighbourhood Planning Team

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**From:** Hammond, Victoria  
**Sent:** 26 August 2022 08:45  
**To:** Neighbourhood Planning Team  
**Subject:** RE: Walford Regulation 16 submission neighbourhood development plan consultation  
**Attachments:** Walford\_Reg16\_NDP\_June22\_VH Comments.pdf

Dear NDP team

Please find attached comments from transportation

Thanks  
Vicky

*vii) Promoting the improvement of public and/or community transport facilities and solutions that would increase access to facilities that cannot be provided within the Parish and enable more transport choice.*

*viii) Ensuring developments are designed to provide environments that feel safe and where community cohesion and spirit is actively encouraged.*

*ix) Ensuring the needs of elderly people, especially the very elderly, and people with disabilities are met fully.*

### **3. New Housing:**

To accommodate the required level of proportional housing growth in a way that meets the needs of the Parish and comprises sensitive and sustainable forms of development. This will be through:

*i) Locating most dwellings on small sites within or adjacent to the built-up areas of Walford and Coughton, Bishopswood and Howle Hill, taking into account their character, nature and any constraints.*

*ii) Ensuring mixtures of dwelling types and sizes to meet local needs, e.g. starter homes for young people, family housing and self-build opportunities.*

*iii) Meeting the housing needs of elderly people, including the very elderly, through mobility, sheltered and other specialist forms of housing.*

*iv) Requiring high quality site layouts, building design and landscaping that reflect local densities, character and distinctiveness; protect landscape character, especially within the Wye Valley AONB, and incorporate modern services and facilities.*

*v) Incorporating sustainable design features, in particular, achieving the highest level of carbon neutrality and water conservation.*

### **4. Business and Economic Development:**

To support development proposals for local businesses where these reflect the nature and scale of the Parish, in particular farm diversification, tourism and working from home through:

*i) Promoting proposals for the conversion of rural buildings to employment uses where these fit into the local environment and the capacity of the local road network.*

*ii) Retaining those local businesses operating in appropriate locations, supporting extensions where these can be achieved without adversely affecting the landscape and residential amenity.*

*iii) Enabling farm diversification where this does not harm the character and appearance of the Parish and the Wye Valley AONB, paying particular regard to scale and location.*

*iv) Facilitating working from home in particular by seeking modern infrastructure and appropriate layouts within new developments.*

*v) Enabling the development of the tourism sector where this fits sensitively into the landscape and general environment of the Wye Valley AONB;*

## Policy WALF1: Promoting Sustainable Development

Positive measures that promote sustainable development within Walford Parish will be supported. Where development proposals are advanced, they should address the following priorities that are considered essential by the local community for maintaining sustainable development within the Parish:

- a) The highest priority will be given to conserving and enhancing the natural beauty and special qualities of the Wye Valley AONB and to the protection of its important natural habitats. Enhancement proposals will be required where appropriate.
- b) The wider natural and historic environment will also be protected by ensuring development does not have any significant adverse effects through poor design; being sited in inappropriate locations, in particular avoiding wherever possible the loss of the best and most versatile agricultural land; or spoiling the quiet enjoyment appreciated by those who live, work or visit the area.
- c) Particular attention should be paid to considering whether and, if so, what measures should be incorporated to mitigate or adapt to the effects of climate change.
- d) Community facilities and services should be retained and enhanced where possible including through contributions that will enable pressures resulting from growth to be accommodated satisfactorily.
- e) New housing shall be located where this is in scale with the area concerned and to provide a range of accommodation.
- f) Local employment opportunities will be supported where these promote diversification of the local economy, especially tourism, working from home, and activities that reflect the scale of the rural area.
- g) **The capacity of local infrastructure, including roads and utilities, should be sufficient to accommodate the development proposed.**

Benefits will be sought in relation to the priorities set out in this policy where compensatory or mitigation measures are needed as part of any proposal.

(Supporting Objectives 1 to 6)

### Justification

- 4.7 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires all planning applications to be determined in accordance with the adopted Development Plan unless material considerations indicate otherwise. This overarching strategic policy sets out the essential sustainable development requirements which the local community considers important to achieve its vision and objectives. The provisions within this NDP will be measured against this policy.
- 4.8 The Wye Valley AONB is a national designation and places obligations upon those making decisions about development within it, which the first part of the policy provides. It also seeks to protect important habitats. The River Wye is a Special Area of Conservation that has the highest level of protection. The integrity of both these

- e) Highway layouts within new developments minimise the impact of roads on the environment and encourage reduced speeds.
- f) The safety of pedestrians and of cyclists is protected and enhanced where possible, especially where there are no public footpaths.
- g) Housing layouts provide for the safety of children in areas designed and located for their play.
- h) **Where appropriate, travel plans<sup>22</sup> are provided that include offsite measures such as supporting infrastructure to promote active travel, e.g. walking and cycling.**
- i) There are no adverse effects upon the public right of way network within the Parish and that opportunities are taken to link new development to the existing network and provide connections between routes where practicable.
- j) Off-road parking spaces and appropriate public hard landscaped areas are constructed using permeable materials.
- k) All new developments with parking make provision for electric vehicle charging at an appropriate level, including for each dwelling in residential developments and, for other forms of development, to suit the needs of the expected level of traffic generation.
- l) The nature of the development does not lead to pressure for the provision of street lighting where this is not currently present within the area concerned and that necessary for public safety should be kept to a minimum to avoid light pollution in the immediate environment.

**(Supporting Objectives 1 and 5)**

Justification

- 6.2 With the need to accommodate further development, it is essential that the highway requirements are met through a comprehensive approach covering design requirements, promoting active travel, managing parking and ensuring associated infrastructure are incorporated. Safety of all residents in housing areas, and especially children, older people and those with disabilities, is paramount and the network should be capable of coping with the traffic generated. This applies not only in the locations where growth is proposed but also elsewhere in the plan area. It is also important that residential amenity and the wider environment are protected from the impact of traffic. Design measures should be used to calm traffic, fit layouts into the landscape and avoid clutter. Encouraging residents to minimise the use of cars is becoming increasingly important and all measures to promote this should be utilised. Layouts should emphasise active travel components ensuring easy and the most direct connection to footways that provide access to the Ross-on-Wye, areas of employment and other facilities. Larger housing sites will need to provide areas for children's play, and they should be in safe locations as well as having easy access. Travel plans are key to ensuring an integrated approach. Measures to encourage active travel, not just through making provision for cycle parking, but through a range of measures, including accommodating the needs of the disabled should be considered according to the proposed use. Measures to promote the health and wellbeing of residents should also be undertaken, for example by providing links to the Public Rights of Way network. Vehicle parking should be sufficient

<sup>22</sup> <https://www.gov.uk/guidance/national-planning-policy-framework/9-promoting-sustainable-transport#para111>



Willow Walshe

To Whom it My Concern

Dear Sir or Madam

I wish to register my objection to Walford Neighbourhood Development Plan (NDP).

[REDACTED] it was just by sheer chance by talking to a neighbour I found out about the NDP proposals. Myself, along with several other residents [REDACTED] have received no notification or information regarding this matter. The way Howle Hill has been divided into three separate boundaries is absolutely appalling. The boundary of Howle Hill should include all the properties and not just a select few.

It has always stood that all the properties under the post code HR9 5SP have always been within the boundaries of Howle Hill.

Herefordshire Council recently stated in a Planning meeting that Howle Hill had been earmarked for development. If you look at the way Howle Hill has been carved up into three separate areas, there is absolutely no way that any development of any kind could take place. This cannot be right.

In a government white paper, it states "that towns and cities across the country cannot withstand much more development and that consideration should be given to villages and rural areas". It is not right how Howle Hill and the rest of the Parish of Walford has been divided up into segregated areas. Development is required in villages/settlements to ensure their sustainability.

The Parish of Walford needs development across the whole Parish, not just selected areas.

Hereford Council should organise a full, honest, and open public consultation for all the residents of Walford Parish to participate in.



## Neighbourhood Planning Team

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**From:** donotreply@herefordshire.gov.uk  
**Sent:** 26 August 2022 12:09  
**To:** Neighbourhood Planning Team  
**Subject:** Online form submitted: Comment on a proposed neighbourhood area

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### Comment on a proposed neighbourhood area

We have received the following form online. Reference: 843048

Question	Response
Address	REDACTED
Postcode	REDACTED
First name	Zaven
Last name	Boyrazian
Which plan are you commenting on?	Walford
Comment type	Support
Your comments	<p>REDACTED. It becomes extremely narrow at this point, and the wall REDACTED abuts onto the lane along with REDACTED, which has been damaged repeatedly when wider vehicles attempt to pass through. REDACTED are on the outskirts of this settlement in the open countryside. Following the recent planning and regulatory decision, I think the settlement boundary line should be taken back to the dead-end sign. This committee's decision concluded this area as open countryside unsuitable for development because of its unsustainable and poor access on a narrow dead-end lane. REDACTED do not form part of the main built-up form of Howle Hill, and what used to be the pub, the church, and the schoolhouse have been private houses for many years.</p>

Herefordshire Council  
By email only

19 August 2022

Dear Sir/Madam,

**Walford Neighbourhood Development Plan: Submission Consultation under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended)**

These representations have been prepared by Zesta Planning on behalf of Mr David Jordan in response to the current consultation on the submission version of the Walford Neighbourhood Development Plan 2011-2031 (WNDP), published pursuant to Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended).

By way of background, Mr David Jordan resides at REDACTED. An outline planning application for the erection of 3 dwellings on the land was submitted to Herefordshire Council in January 2021 but was refused on 11<sup>th</sup> August 2022 by the Council's Planning Committee contrary to their officer's recommendation for approval. The application was refused based on the site being outside of the settlement boundary for Howle Hill in the (not yet adopted) Walford NDP, alleged landscape harm and concerns over the accessibility of the site location.

Our client welcomes the opportunity to provide comments on the emerging plan and understands that it is this version of the plan that will be subject to examination.

Our representation to the WNDP relates to the plan's development strategy and its associated housing policies as set out below. We also raise concerns over the suitability of one of the housing sites allocated in the plan.

- WALF2 – Development Strategy
- WALF18 – Housing Development in Walford and Coughton
- WALF19 – Housing Development in Bishopswood

- WALF20 – Housing Development in Howle Hill
- WALF21 – Proposed Housing Sites

## General Legislative Context

In order for a Neighbourhood Plan to be successful at independent examination it must be demonstrated that the plan conforms to the ‘basic conditions’ as set out within Paragraph 8, Schedule 4B of the Town and Country Planning Act 1990 (as amended).

An Independent Examiner will consider whether the basic conditions are met. The basic conditions applicable to neighbourhood plans are:

- Having regard to national policies and advice contained in guidance issued by the Secretary of State
- The making of the order (or neighbourhood plan) contributes to the achievement of sustainable development
- The making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority
- The making of the order (or neighbourhood plan) does not breach and is otherwise compatible with EU obligations
- prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan)

## National Policy

Neighbourhood Plans must have regard to the provisions of the National Planning Policy Framework 2021, (the Framework). Paragraph 13 of the Framework sets out that the application of the presumption in favour of sustainable development (Paragraph 11), has implications for the way communities engage in neighbourhood planning:

*‘Neighbourhood Plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies.’*

Paragraph 18 of the Framework notes that Local Plans should address strategic and non-strategic matters, with neighbourhood plans covering just non-strategic policies.

Paragraph 29 notes that Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan. Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies.

The Planning Practice Guidance (PPG) on Neighbourhood Planning notes that neighbourhood plan policies should be clear and unambiguous and supported by appropriate evidence. Paragraph 40 of the PPG notes: 'While there are prescribed documents that must be submitted with a neighbourhood plan or Order there is no 'tick box' list of evidence required for neighbourhood planning. Proportionate, robust evidence should support the choices made and the approach taken. The evidence should be drawn upon to explain succinctly the intention and rationale of the policies in the draft neighbourhood plan or the proposals in an Order.'

Paragraph 103 states that Neighbourhood planning bodies are encouraged to plan to meet their housing requirement, and where possible to exceed it. A sustainable choice of sites to accommodate housing will provide flexibility if circumstances change, and allows plans to remain up to date over a longer time scale.

### **WNDP Development Strategy**

The plan's development strategy is set out at Policy WALF2 and states as follows:

***Housing growth within defined settlement boundaries will be promoted at Walford and Coughton, Bishopswood and Howle Hill, predominately through infilling, where this reflects the character of the particular settlement. In addition, a site is proposed within Walford Parish adjacent to Ross-on-Wye settlement boundary.***

***Outside these boundaries, housing development should comply with Herefordshire Local Plan Core Strategy policy RA3.***

Policy RA3 of the Herefordshire Core Strategy then states that in rural locations outside of settlements, residential development will be limited to proposals which satisfy one or more of a number of listed criteria. These criteria relate to the normal set of countryside exceptions such as agricultural workers dwellings, replacement

dwelling, the re-use of buildings and rural exception sites for affordable housing amongst others.

Policies WALF18-20 permit housing proposals that comprise sensitive infilling with the defined settlement boundaries at Walford and Coughton, Bishopswood and Howle Hill. Policy WALF21 allocates 5 sites for new housing at Bishopswood, Coughton and Ross on Wye respectively.

We raise concerns over this strategy not meeting the identified housing requirement for the Parish set out at Policy RA1 of the Herefordshire Core Strategy. The proposed settlement boundaries and associated policies would therefore be ineffective as they would act to prevent any additional sites for housing coming forward which will be necessary to address the unmet housing need in the Parish. As such, it is our position that the WNDP does not meet basic conditions. We make further comments on this point later in this representation.

We also raise concerns over the suitability of one of the plan's housing sites set out at Policy WALF21.

### Housing requirement and supply

Policy RA1 of the Core Strategy states that for the Ross on Wye Rural Housing Market Area the indicative housing growth target is 14% of the existing number of dwellings in the area. For Walford Parish this translates to 91 dwellings over the plan period 2011-2031. Paragraph 4.8.21 within the reasoned justification to Policy RA1 makes it clear that the proportional growth target within the policy will provide the basis for the minimum<sup>1</sup> level of new housing that will be accommodated in each neighbourhood development plan.

Table 2 of the WNDP sets out the sources of supply that will contribute towards meeting the identified housing requirement for the Parish. This is set out at Figure 1 below.

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<sup>1</sup> Our emphasis

Figure 1 – Achieving the Housing Target (Table 2 from WNDP)

	Number of Dwellings
Housing Requirement 2011 – 2031: 91 Dwellings	
Dwellings built 2011 to April (Source Herefordshire Council)	14
Dwellings with planning permission April 2011 to April 2021 (Source Herefordshire Council)	39
Dwellings with planning permission April 2021 to September 2021 (Source: Herefordshire Council's website)	9
Site Allocations*	
i) North side of Leys Hill Lane, Bishopswood.	3
ii) Arthur's Dingle adjacent to the B4234, Bishopswood	5
iii) Lower Field at Orchards Heights, Bishopswood.	3
iv) Off Watling Street, Ross-on-Wye	5
v) Land south of Cedar Grove, Coughton	5
Windfall allowance (See para 7. 20)	18
<b>Estimated Housing Potential during Plan Period</b>	<b>101</b>

Firstly, we raise concerns over the inclusion of 39 dwellings granted planning permission between April 2011 and April 2021. The details of these sites are set out at Appendix 10 of the Parish Council's 'Meeting Housing Need and Site Assessment Report' (August 2020) – attached to this representation at Appendix 1. From a review of these sites it would appear that the following permissions have expired unimplemented:

- P150248/F – Full permission for 3 dwellings on Land at Thorny Orchard, Coughton – expired 13<sup>th</sup> September 2019
- P170596/F – Full permission for 1 dwelling on Land adjacent to Road Cottage, Walford – expired 9<sup>th</sup> October 2020

These sites are not therefore deliverable at present and should not contribute towards the supply of housing in the Parish. This has the effect of removing 4 dwellings from the plan's supply.

It is also noted that the following permissions relate to occupationally tied dwellings and are not therefore available on the open market:

- S111970/F – Full permission for 2 staff dwellings at the Mill Race Pub, Walford. Condition 2 of this permission states that the occupation of the staff accommodation shall be limited to persons solely or mainly working at the Mill Race Pub.
- P171639/F – Full permission for erection of farm managers dwelling on Land at Home Farm, Bishopswood. Condition 10 of this permission states that

the occupation of the dwelling shall be limited to a person solely or mainly working or last working in the locality in agriculture or forestry.

It is argued therefore that these permissions should not contribute towards the plan's supply as they are exclusive to those working at the respective establishment/local industry. They are not available on the open market and will not address the demands for housing created by general population growth and new household formation in the Parish. This has the effect of removing a further 3 dwellings from the supply.

Secondly, as demonstrated above, it is considered that a lapse rate should be applied to the remaining permissions making up this source of supply. Out of the 45 valid dwellings (i.e. excluding the occupationally tied dwellings), the permissions for some 4 of these have lapsed. This equates to 9%. However, as that relates to a relatively small sample of permissions it may not therefore be a true representation of the likelihood of permissions lapsing. Whilst Herefordshire Council do not currently apply a lapse rate to permissions in their 5 year housing land supply work, this has been disputed at appeals. Historically, and up until 2015, the Council had applied a 10% lapse rate to commitments (see extract from 5 year housing land supply statement (October 2014) at Appendix 2 to this representation). At paragraph 4.10 of this statement the Council state that:

*“Not all planning permissions are completed within a 5 year period. Some applications lapse whilst others are superseded with new permissions. Therefore it is appropriate to include a discount rate within the 5 year calculation. A discount rate of 10% for lapsed and superseded sites has been applied. It is a notional but recognised discount.”*

Although the Council stopped applying a lapse rate following the adoption of the Herefordshire Core Strategy in 2015, and this was considered through the plan's examination, that related to a snapshot in time and is now some 7 years old. Moreover, on the basis that the Core Strategy is now over 5 years old, its approach to housing need and supply is considered to be out of date having regard to Paragraph 74 of the NPPF the advice on housing supply and delivery in the PPG. On this basis, and in light of the clear evidence of lapsed permissions within Walford parish, it would seem reasonable in this instance to apply a lapse rate of 10% to the 'valid' permissions at Table 2 of the WNDP. This excludes the expired permissions (4 dwellings) and occupationally tied (3 no.) dwellings set out above.



Thus, out of the 41 valid dwellings (48-3-4), a 10% lapse rate would equate to 4 dwellings which should be discounted from the supply.

Finally, we raise concerns over the inclusion a windfall allowance of 18 dwellings within the supply. It is standard practice to not apply a windfall allowance to the first three years of the period so to avoid double counting with existing commitments. On the basis that there are 9 years left of the plan period up to 2031, a windfall allowance should only be applied to the final 6 years. This has the effect of reducing the windfall allowance by a third which equates to 6 out of the 18 dwellings. The windfall allowance should only therefore be 12 dwellings.

In light of the above, the estimated housing potential from existing commitments and other potential windfall should be reduced by 17 dwellings. This equates to a total supply of 49 dwellings from these sources (as opposed to 66 as set out at Table 2 of the WNDP).

### Proposed Housing Sites

We raise concerns over the suitability of Land on north side of Leys Hill Lane, Bishopswood (WALF21a on policies map) on landscape grounds.

This site is located in the Wye Valley AONB. The Stage 2 Site Assessments at Appendix 7 of the Parish Council's 'Meeting Housing Need and Site Assessment Report' (August 2020) assesses this site as Site 26. It identifies 'major adverse' effects on the landscape and consequently the site is given a scoring of 5 on landscape which is the highest degree of adverse effect and indicates a 'major or significant adverse effect'.

The following comments are provided within the report for WALF21a:

*"Visual integrity is considered to be of paramount importance in this very visible landscape that is open to long-distance views. The submitted site appears to sit at a point where the landscape changes from a 'Principal Wooded Hills' landscape type to 'Forest Smallholdings and Dwellings'. Dwellings in the latter should not comprise clusters or groups. The visual integrity of this landscape will be adversely affected by developing this site through extending the built up area of Bishopswood and increasing density in this location when taking into account*

*dwellings resulting from a recently granted planning permission for 5 dwellings, and drawing in the small cluster to the north. This will be at a point where a substantial cluster of dwellings would not be a characteristic of the landscape and result in increasing visibility of built form within a part of the AONB where development will adversely affect its scenic beauty."*

We concur with the landscape assessment for this site set out within the report. This site is located atop a steep slope at approximately 120m AOD which sharply rises up from the River Wye at approximately 30m AOD and located just 400m to the south. The site is also somewhat detached from the main built up area of the village and, together with the proposed settlement boundary, would have the effect of extending the settlement up the hillside.

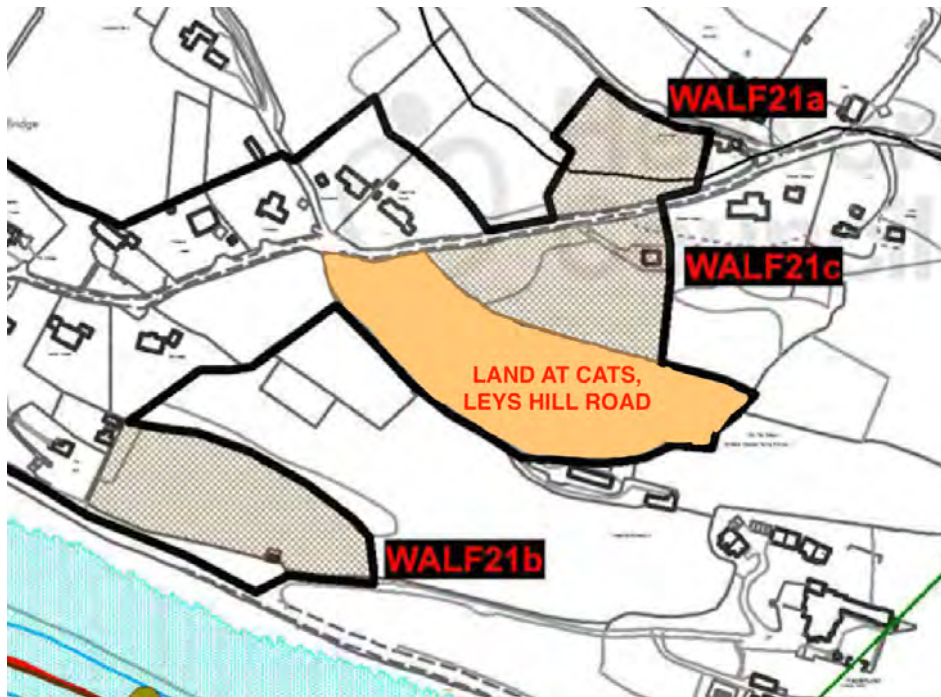
Paragraph 176 of the NPPF states that great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues. It states that the scale and extent of development within all these designated areas should be limited.

It is therefore our position that the major adverse effects on the AONB resulting from this site should attract substantial weight which would outweigh the relatively minor benefits arising from the site. This site would not therefore be consistent with the overall aim of the NPPF to promote sustainable development. These same comments would have applied to Land at Lower Field, Orchards Heights, Bishopswood (WALF21c on policies map) although it is noted that this has now been granted planning permission for 3 dwellings. There are concerns however over the cumulative scale of development in this sensitive location, particularly given the relatively recent and not yet implemented permission for 5 dwellings<sup>2</sup> on land immediately to the south of WALF21c. The relationship between the three sites is set out at Figure 2 overleaf.

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<sup>2</sup> Permission ref. P161689/F – Land at Cats, Leys Hill Road

Figure 2 – Cumulative extent of potential growth within AONB



Paragraph 176 of the NPPF states that the scale and extent of development within AONBs should be limited. There are concerns that these proposed developments, when taken cumulatively, would result in a significant and adverse visual change to this sensitive and elevated landscape which, by the WNDP group's own admission is a very visible landscape that is open to long-distance views.

There are also concerns that the cumulative scale of development, which would amount to some 11 dwellings in total, would conflict with the Forest Smallholdings and Dwellings Landscape Character type as identified in the Herefordshire Landscape Character Assessment SPG (2004), which states that additional individual dwellings may be appropriate in some circumstances where the scale of the original settlement would not be compromised<sup>3</sup>. It is considered that these proposals would have the effect of significantly compromising the scale of the original settlement.

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<sup>3</sup> Our emphasis

On the above basis, it is therefore considered that site WALF21a is unsuitable for allocation in the WNDP and should be deleted to avoid any further harm to the AONB.

The deletion of this site would reduce the plan's supply by a further 3 dwellings.

#### Estimated housing potential during plan period

On the above basis, the total estimated housing potential during the plan period should only be **81 dwellings**. This is substantially below the minimum requirement for 91 dwellings under Core Strategy Policy RA1.

Whilst the comment at paragraph 7.20 of the WNDP regarding the possible allocation of up to 10 dwellings from Ross on Wye's supply to meet any shortfall within Walford is noted, this is not considered to be a sound approach. Ross on Wye has its own housing requirement that is separate to that of the Rural Housing Market Area as set out at Policy RW1 of the Core Strategy. There does not appear to be any mechanism within the Core Strategy for supply sharing between housing market areas and, moreover, it is argued that housing delivered within Ross of Wye town will not be located where it will enhance or maintain the vitality of the rural communities within Walford Parish as required under paragraph 79 of the NPPF.

In conclusion on this matter, it is considered that the settlement boundaries in the WNDP and their associated policies are ineffective as they would not provide for enough housing to meet the Core Strategy requirement for 91 dwellings in the Parish. They would also act to prevent any additional housing coming forward that will be required to meet the remaining housing need, due to the strict controls on new housing outside settlement boundaries provided under Core Strategy Policy RA3.

On this basis, it is considered that the WNDP would not meet the basic conditions. It would conflict with the requirement at paragraph 29 of the NPPF for neighbourhood plans to not promote less development than set out in the strategic policies for the area. It would also be inconsistent with the advice at Paragraph 103 of the Neighbourhood Planning PPG which states that neighbourhood planning bodies are encouraged to plan to meet their housing requirement, and where possible to exceed it.

For these reasons, the WNDP would also not be in conformity with the strategic policies contained in the development plan for the area of the authority. Furthermore, the WNDP would not contribute to the achievement of sustainable development as it would result in an unmet housing need within the Parish which would result in social issues associated with a lack of available housing. There are concerns that this may cause the village to stagnate and harm the vitality of its communities. Paragraph 79 of the NPPF makes it clear that in order to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive. The site allocation at WALF21a would also result in major adverse effects on the AONB which should attract substantial weight and would outweigh the relatively minor benefits arising from the site. This site would not therefore be consistent with the overall aim of the NPPF to promote sustainable development.

To resolve this objection, it is considered that:

- a) the settlement boundaries within the WNDP should be deleted
- b) Housing Site WALF21a should be deleted
- c) Policy WALF2 of the plan should be modified as set out below.

**Policy WALF2: Development Strategy (suggested modified wording)**

~~Housing growth within defined settlement boundaries will be promoted at Walford and Coughton, Bishopswood and Howle Hill, predominately through infilling, where this reflects the character of the particular settlement. In addition, a site is proposed within Walford Parish adjacent to Ross-on-Wye settlement boundary.~~

~~Outside these boundaries,~~ **All proposals for new housing development at these settlements** should comply with Herefordshire Local Plan Core Strategy policy ~~RA3~~ **RA2**.

\*Deletions are shown as strikethrough and additions and shown in **red**.

Accordingly, it is considered that policies WALF18, WALF19 and WALF20 should also be deleted.

An alternative resolution to this objection could involve a more significant revision of the Reg 16 version of the plan and its reissuing for consultation prior to submission for examination. This could involve the creation of expanded settlement boundaries and the allocation of further and alternative sites in order to fully meet the housing requirement for the Parish. In this regard, we would take this opportunity to present Land at The Old Kilns, Church Lane, Howle Hill as an additional site that is suitable for allocation for three dwellings and inclusion within an expanded settlement boundary for Howle Hill.

### Land at The Old Kilns, Church Lane, Howle Hill

As previously mentioned within this representation, an outline planning application for the erection of 3 dwellings at this site was submitted to Herefordshire Council in January 2021 and received support from the Council's Planning Officers.

The site is located immediately adjacent to the Howle Hill settlement boundary defined in the WNDP, as shown at Figure 3 below.

Figure 3 – Land at The Old Kilns site location



The indicative development layout is shown at Figure 4 overleaf.

Figure 4 – Proposed development on Land at Old Kilns, Howle Hill



As shown through the site layout at Figure 4, the proposal would be well related to the built up area of the village and is considered to be of an appropriate scale commensurate with its location.

Unlike all of the other site allocations in the WNDP, the site is not located in the AONB. As part of the determination of the recent planning application for the development, the Council's Landscape Officer raised no objection and found that proposals are in accordance with Core Strategy Policy LD1 as they demonstrate that the character and scale of the development is suitable to the setting.

The Council's officers found the proposal to be acceptable in principle and the application received no objection on highways, ecology, landscape and drainage grounds. Accordingly the application was recommended for approval. Notwithstanding this, the Council's Planning Committee refused the application based on the site being outside of the settlement boundary for Howle Hill in the Walford NDP, alleged landscape harm and concerns over the accessibility of the site location. This decision is considered to be unsound as only limited weight can be applied to the WNDP at this stage, as confirmed by the Council's Neighbourhood Planning Manager in their response to the application.

Given the clear suitability of the site for development and the lack of any robust reasons for dismissing the site, it is considered that if the plan were to be revised this site should be included as an allocation for new housing development. This

would help to address the identified shortfall in the housing supply for the Parish in a suitable location and in an appropriate manner.

It should also be noted that the WNDP provides no housing allocations at Howle Hill and there are concerns that this would result in an unbalanced distribution of housing in the Parish.

## Conclusion

Overall, it is considered that the settlement boundaries in the WNDP, and their associated policies, are ineffective as they would not provide for enough housing to meet the Core Strategy requirement for 91 dwellings in the Parish. They would also act to prevent any additional housing coming forward that will be required to meet the remaining housing need, due to the strict controls on new housing outside settlement boundaries provided under Core Strategy Policy RA3.

Housing Site WALF21a would result in major adverse effects on the AONB which should attract substantial weight and would outweigh the relatively minor benefits arising from the site. This site would not therefore be consistent with the overall aim of the NPPF to promote sustainable development.

It is therefore concluded that the WNDP as submitted does not meet the basic conditions, insofar as it would not contribute to the achievement of sustainable development, it does not have sufficient regard to the NPPF and PPG, and is not consistent with the strategic policies of the Core Strategy. Accordingly, it is recommended that the modifications set out within this representation will be necessary in order to ensure the plan can proceed to referendum. Alternatively, it is recommended that the current version of the plan is withdrawn and re-issued for consultation with an expanded settlement boundary for Howle Hill and the allocation of Land at The Old Kilns, Church Lane, Howle Hill in order to secure the important contribution this will make towards meeting the Parish's housing requirement.

Yours faithfully

**Matt Tyas** MSc MRTPI  
Principal Planner



**Appendix 1 – Appendix 10 from Meeting Housing Need and Site Assessment Report (Walford NDP Steering Group August 2020)**

# **Walford Neighbourhood Development Plan 2011-2031**



## **Meeting Housing Need and Site Assessment Report**

**August 2020**

**Prepared by Walford Neighbourhood Development Plan  
Steering Group**

## APPENDIX 10: PLANNING PERMISSIONS SINCE 2000 – WALFORD PARISH

### (See main report Section 5)

(Source, Herefordshire Council's planning application information upon its website)

APPLICATION NO	LOCATION	No of Dwellings	APPROVAL DATE	INSIDE/ OUTSIDE <sup>32</sup>	COMMENTS
P192800/F	6 Coughton Place Coughton	1	16 March 2020	I	Walford (Coughton)
P192723/O	Land at The Leys, Bishopswood Ross on Wye Herefordshire	1	19 February 2020	I	Bishopswood
P192632/F	Coughton Lawn Walford Ross-on-Wye HR9 5RY	1	22 January 2020	I	Walford (Coughton)
P184229/F	Chadwyns Farm Walford Ross-on-Wye	1	29 January 2019	O	Rural Building Conversion
P181851/F	Land adjacent Myrtle Cottage Howle Hill Ross-on-Wye Herefordshire	1	9 August 2018	I	Previous permission 170050/F could be adjacent to – check SB includes
P174178/O	Land opposite Cheques Lodge Leys Hill Road Walford Ross-On-Wye Herefordshire HR9 5QU	2	9 February 2018	I	Bishopswood
P172215/O	Land adj. to Howle Hill Crossroads, Howle Hill Ross-on-Wye Herefordshire	4	2 August 2018	O	Approved as an affordable housing scheme not adjacent to the settlement. Market housing is cross subsidy.
P171639/F	Land at Home Farm Bishopswood Herefordshire HR9 5QZ	1	14 August 2019	O	Agricultural dwelling
P170596/F	Land adjacent to Road Cottage Walford Ross on Wye Herefordshire HR9 5QR	1	9 October 2017	I	Considered part of Walford settlement by Planning Officer – see report
P161689/F	Land at Cats Leys Hill Road Walford Ross-on-Wye Herefordshire HR9 5QU	5	5 January 2017	I	Officer report identifies to be associated with the settlement of Bishopswood
P161523/F	Porter's Lodge Coughton Ross-on-Wye Herefordshire HR9 5SE	2	6 September 2016	I	Walford (Coughton). Extends old UDP boundary
P150508/F	The Old Wash House, The Dean Road Bishopswood Herefordshire HR9 5QZ	1	16 April 2015	O	Rural Building Conversion
P150248/F	Land at Thorny Orchard Coughton Ross-on-Wye Herefordshire	3	13 September 2016	O	(updated permission for 131631/F)
P143513/F	Westways, Coughton Ross-On-Wye Herefordshire HR9 5RR	1	27 January 2015	I	Walford (Coughton).
P141753/F	Old Chapel Cottage Walford Ross-On-Wye	1	31 July 2014	O	Holiday let to permanent dwelling

<sup>32</sup> Assessment of whether a site would fall within/adjacent (INSIDE) to what might be defined as the settlement boundary for one of the Parish's three settlements or reasonably outside/away from (OUTSIDE) a boundary. In the latter instance these would amount to rural windfall developments that would have been considered under Core Strategy policy RA3 or previous relevant policy.

	Herefordshire HR9 5QU				
S111970/F	The Mill Race Pub Walford Ross-on-Wye Herefordshire HR9 5QS	2	14 March 2012	O	2 staff dwellings
S110885/F	Great Howle Farm Star Beech Hill Ross-on-Wye Herefordshire HR9 5SL	10	27 June 2012	O	Rural Building Conversion
Start of Plan Period					
DS083149/F	Rose Farm Howle Hill Ross-On-Wye, Herefordshire HR9 5SJ	1	22 January 2009	O	Rural Building Conversion
DS072913/F	Warryfield Farm Walford Ross-On-Wye, Herefordshire HR9 5QW	4	25 October 2007	O	Rural Building Conversion
DS063194/F	Bishopswood House Bishopswood Ross-On-Wye, Herefordshire HR9 5QZ	3	15 November 2006	O	Rural Building Conversion
DS061226/F	No 7 Walford Court Barns Walford Ross-On-Wye, Herefordshire HR9 5QP	1	30 August 2006	O	Rural Building Conversion
DS061043/F	Arbour Hill Farm Arbour Hill Lincoln Hill, Ross-On-Wye, Her HR9 7TH	3	7 June 2006	O	Rural Building Conversion
DS052343/F	The Stables Bishopswood House Bishopswood, Ross-On-Wye, HR9 5QZ	1	31 August 2005	O	Rural Building Conversion
DS044278/F	Building Conversion, St Johns Church and Sunday School Church Road Howle Hill Herefordshire	2	30 September 2005	I	Rural Building Conversion Planning officer's report that suggests this is edge of Howle Hill settlement.
DS043166/F	Outbuilding to Old Hill Court Hom Green Ross-On-Wye, Herefordshire HR9 7TQ	1	24 February 2005	O	Rural Building Conversion
DS032998/F	Former Water Board Depot Walford Road Coughton, Ross-On-Wye	9	7 September 2004	I	Walford (Coughton)
DS023453/F	Walford Court Barns Walford Court Walford, Ross-On-Wye, Hereford HR9 5SA	6	30 September 2003	O	Rural Building Conversion
DS022464/F	Rose Cottage Kerne Bridge Ross-On-Wye Herefordshire HR9 5QU	1	3 February 2003	I	Bishopswood
DS020781/F	The Old Mill Coughton Farm Near Ross-On-Wye, Herefordshire HR9 5SF	1	1 May 2002	O	Rural Building Conversion
DS012057/F	Site Adjacent To 'Bermol Walford Ross-On-Wye, Herefordshire	1	20 July 2001	I	Walford (Coughton)
DS012054/F	Site Adjacent to Danegeld Walford Ross-On-Wye, Herefordshire	1	20 July 2001	I	Walford (Coughton)
DS010875/F	Land Adjoining the Glebe and B Walford Herefordshire	8	7 September 2001	I	Walford (Coughton)
DS012114/F	The Mill Race Public House Walford Ross-On-Wye, Herefordshire	1	25 July 2001	I	See P170596/F above
DS001858/RM	Land Adjoining the Glebe and B Walford Herefordshire	4	27 February 2001	I	Walford (Coughton)
DS000246/RM	Nelson's Garage Walford Ross-On-Wye, Herefordshire	5	28 July 2000	O	See P170596/F above
DS991466/F	The Old Stables Howle Hill Nr Ross-On-Wye, Herefordshire	1	7 December 2000	O	Rural Building Conversion
DS990112/RM	Site at Bishopswood (Previously Kerne Bridge) Ross-On-Wye, Herefordshire	1	12 August 1999	I	Bishopswood - reserved matters permission.

Appendix 2 – Extract from Herefordshire Council 5 year housing land  
supply report October 2014

**Interim Position Statement at 1<sup>st</sup> April 2014**

**1. Introduction**

1.1 The National Planning Policy Framework (NPPF) published in March 2012 indicates that local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide five years supply of housing against their housing requirements including an additional buffer to ensure choice and competition in the market for land. This Statement sets out an assessment of the housing land supply position in Herefordshire taking into account the requirements of the NPPF at 1<sup>st</sup> April 2014.

**2. Planning Policy**

**National Planning Policy Framework**

2.1 Paragraph 49 of the NPPF states *“relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites”*. Where the existence of a five year land supply cannot be demonstrated, there is a presumption in favour of granting planning permission for new housing unless the development can be shown to cause demonstrable harm to other factors that outweigh the need for new housing. Paragraph 14 of the NPPF states that there *“is a presumption in favour of sustainable development and for decision taking this means... where the development plan is absent, silent or relevant policies are out of date, granting planning permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole... or specific policies in this Framework indicate development should be restricted.”*

2.2 The NPPF is therefore emphasising the importance of the presumption in favour of sustainable development. In reaching a decision upon new housing the housing land supply position will need to be balanced against other factors in the development plan and/or NPPF which could result in the refusal of planning permission. The footnote to paragraph 14 of the NPPF is helpful in identifying those areas that the NPPF has in mind where development should be restricted. By way of example it lists:

- sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest
- land designated as Local Green Space
- land designated as an Area of Outstanding Natural Beauty
- land affected by designated heritage assets
- land at risk of flooding

2.3 NPPF, paragraph 47 and footnote 11, states that sites identified within the 5 year supply must be *deliverable*. To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and, in particular, that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years. The

### **3. Allocated sites in the Herefordshire Unitary Development Plan (HUDP)**

- 4.9 There are some remaining sites identified in the HUDP that do not yet have the benefit of planning permission (as at 1 April 2014). Where there is clear evidence that such sites will be brought forward then they will be included in the 5 year supply. However, on this occasion no such sites can reliably be seen to be coming forward.

### **4. Discount rate**

- 4.10 Not all planning permissions are completed within a 5 year period. Some applications lapse whilst others are superseded with new permissions. Therefore it is appropriate to include a discount rate within the 5 year calculation. A discount rate of 10% for lapsed and superseded sites has been applied. It is a notional but recognised discount.

### **5. Windfall assessment**

- 4.11 Windfall sites are those that have not been specifically identified as available in the Local Plan process. They normally comprise previously-developed sites that have unexpectedly become available. Herefordshire is a predominantly rural county and experiences a number of windfalls that also come forward on greenfield land. The NPPF states that *“Local Planning Authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment (SHLAA), historic windfall delivery rates and expected future trends, and should not include residential gardens”* (NPPF, Paragraph 48).
- 4.12 The SHLAA is an assessment of the likely total numbers of new houses that could be achieved on sites with potential to deliver 5 or more dwellings. Historically, larger windfall sites have not formed a major part of the housing supply. Over the period 2007/2012, less than 3% of permissions each year were for sites larger than 10 houses and 0.1% of the total number of permissions over this 5 year period was on sites of 100 or more units. Therefore it was decided to focus this assessment on the smaller windfall sites as they have a stronger pattern of occurrence. The historic performance of windfall sites accommodating four or less dwellings was assessed as these sites would not be identified through SHLAA. Historic windfall completions are detailed in the table below.

**From:** Frank Myers  
**Sent:** 19 August 2022 10:10  
**To:** Banks, Samantha <[Samantha.Banks2@herefordshire.gov.uk](mailto:Samantha.Banks2@herefordshire.gov.uk)>  
**Subject:** NDP Walford Parish

This message originated from outside of Herefordshire Council or Hoople. Please do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Ms Banks

I wish to object to the advancement of the Walford Parish Neighbourhood Development Plan until the matters which I describe below are investigated.

As the former Chairman of the Parish Council I have received complaints and wish to voice my concerns, as follows

- When I chaired the handover meeting in 2019, the new ward councillor Yolande Watson YW made it clear that she would be taking a keen interest in the neighbourhood development plan NDP. Shortly afterwards the Parish Council resolved to re-constitute the NDP working group under the chairmanship of Andrew De La Haye ADLH... REDACTED.
- It is my view that REDACTED.
- Another member of the NDP steering group is Andrew Barrant AB. REDACTED.
- REDACTED. I can see no trace of a relevant declaration. This requires investigation.
- William Bloxham WB was appointed to provide independent advice to the Parish. REDACTED.
- REDACTED
- I have received complaints that the Parish Clerk has been selective in responding to enquirers.

I should be grateful if you would acknowledge receipt of this email.

Yours sincerely  
Frank Myers

Frank Myers MBE



**From:** Simeon Cole  
**Sent:** 22 August 2022 19:51  
**To:** Banks, Samantha <[Samantha.Banks2@herefordshire.gov.uk](mailto:Samantha.Banks2@herefordshire.gov.uk)>  
**Subject:** For the attention of Samantha Banks

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Simeon Cole

REDACTED

For the Attention of Samantha banks

Further to my previous email, here are some more facts involving the NPD you may find interesting.

When the Walford Parish council started their NPD they used totally independent consultants called 'Aecon' back in 2017. When they did a survey of the parish, they sent all the data to an independent firm to review the data called Hoople, to determine the wishes of the parish. This method was totally straight and above board and entirely open and transparent. Then the NDP was put on hold for some time as Hereford council had not completed the core strategy. Then the council had a new set of councillors and decided to carry on with the NDP. REDACTED

REDACTED For instance, REDACTED

REDACTED But the houses would be built on land now known as site 11.  
REDACTED  
REDACTED. There are no houses in the NDP for the land behind the school.  
REDACTED

Another problem I have, once again, is with procedure. When the 6 councillors resigned, the NPD department at Hereford Council said that Walford Parish Council should put their NDP on hold until the 6 vacancies were filled and then carry on. However, the new clerk decided to carry on with the NDP REDACTED against the wished of myself and Hereford Council NDP department.

With regards to the issues of collating the information from the later Parish surveys, all the information was given to REDACTED.

With regards to sites 11 & 21, when the Parish council decided to allocate their preferred sites to put in the NDP there was a huge amount of objections at the council meeting against, including site 11. This was because this would obviously open a substantial access road to site 21. I attended that meeting as a member of the public and made my position very clear to the other members of the public my position at the meeting. As the meeting started the council, due to public pressure, decided not to include site 11 in their selection of suitable sites. The public were very relieved that the council had listened to them REDACTED.

REDACTED

A meeting was called to be held at Bishopswood Village Hall.

Even though the items on the agenda to be discussed impacted the residents around Walford School, they knew the road would be closed between Walford Timber & Bishopswood village hall, so as to make it difficult for the effected residents to get to the meeting. The meeting was also not advertised at Walford school notice board, the very place it should have been.

When I questioned this REDACTED I was told the key to the notice board could not be found. It was very interesting to find that after the council had REDACTED the key turned up the very next day. At the meeting to which I refer at Bishopswood Village Hall, some members living next door to site 11 did eventually find their way to the meeting. Right from the start of the meeting it was clear REDACTED

REDACTED Bill Bloxham said that the offer by Ross town council to take some of the quoted of houses allocated to Walford Parish, would only be honoured if Walford parish council had exhausted all land available to put houses on. Also If they did not approve site 11 to have 5 houses (which was the magic amount the parish wanted on any one site) the offer of Ross town council had made could well be off the table.

I thought to myself, if 5 houses is the magic number of houses wanted by the parish on any one site, REDACTED

The meeting started, and I made it quite clear that I was attending the meeting as a member of the public. REDACTED.

She allowed a maximum of 15 minutes for public participation, but the public was not informed as to the content of the rest of the meeting. When the 15 minutes was over, the public was not allowed to speak. REDACTED

It was clear to the members of the public at the meeting that REDACTED

the chair just read out the items and put it to the vote.

Each vote from start to finish took about 15 seconds with no discussion, and site 11 was put back into the NDP. REDACTED.

There were 2 councillors that abstained REDACTED

In conclusion, the Parish has ample land put forward to put 3 time the houses required by Hereford council, as pointed out in the totally independent report by Aecon. If you would like a copy I am very happy to provide you with this. REDACTED

Many Thanks

Simeon Cole (Walford Parish Councillor)