

Aston Ingham Parish Council
Neighbourhood Development Plan 2022-2031

Consultation Statement



Display at drop-in consultation September 2021

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1. INTRODUCTION

1.1 This Consultation Statement has been prepared to accompany the submission of the Aston Ingham Neighbourhood Development Plan (NDP) to Herefordshire Council (HC), the local planning authority, and to ensure that the relevant statutory requirements are met.¹ The Statement:

- Contains details of the persons and bodies who were consulted about the proposed Plan;
- Explains how they were consulted;
- Summarises the main issues and concerns raised by those consulted; and
- Describes how these issues and concerns have been considered and, where relevant, addressed in the proposed Plan.

Format of the Consultation Statement

1.2 The Statement covers the following stages of work on the NDP:

- The initial stages of work on the Plan, covering the designation of the Neighbourhood Area and setting up the Steering Group (section 2).
- The on-line Open Day (section 3).
- Residents' questionnaire survey (section 4).
- Consultation on two housing site options and associated settlement boundaries for the village of Aston Ingham (section 5).
- The Regulation 14 consultation on the draft NDP (section 6)
- The issues and concerns raised in response to the Regulation 14 consultation, and how they were addressed (section 7).

1.3 In summary, the following principal consultation methods were used in preparing the NDP:

- Formation of a Steering Group comprising Parish Councillors and other parish residents.
- NDP tab on the Parish Council website at <https://astoninghampc.org/aston-ingham-parish-council/ndp/>. This was used throughout the process as a means of providing information and seeking views, including providing details of the surveys and other consultations as these were undertaken and reported.
- NDP consultation material was also posted on the parish notice board, in the parish magazine The Chimes (which is hand delivered to every house in the parish), and on social media (Facebook, Nextdoor).
- Printed copies of NDP documents available to view in local, publicly-accessible venues.
- Questionnaire surveys of residents.
- Drop-in event and public meeting held in the Village Hall.
- Consultation on the draft NDP held in accordance with Regulation 14 of the 2012 Regulations.
- Regular updates on progress provided as reports to the Parish Council, in The Chimes, and on the website, where a rolling summary of consultation undertaken was provided at <https://astoninghampc.org/aston-ingham-parish-council/ndp/ndp-consultation-record/>.

¹ Neighbourhood Planning (General) Regulations 2012, Regulation 15 (2)

2. NEIGHBOURHOOD AREA DESIGNATION AND ESTABLISHING THE STEERING GROUP

2.1 The following actions were undertaken by the Parish Council to initiate work on the NDP:

- Application to HC for designation of the Aston Ingham Neighbourhood Area was made on 3 June 2019. HC carried out consultation on the proposed Neighbourhood Area from 13 June to 11 July 2019. No comments were received, and the application was approved on 12 July 2019.
- Establishment of a Steering Group which included both parish councillors and other members of the community, and working to terms of reference provided by the Parish Council. The first meeting of the Steering Group was held on 24 June 2019. Meetings were held regularly during the process of preparing the NDP. The minutes of Steering Group meetings can be viewed on the website at <https://astoninghampc.org/aston-ingham-parish-council/ndp/ndp-minutes/>.

2.2 The issues and concerns raised in this initial stage of the plan-making process comprised in summary:

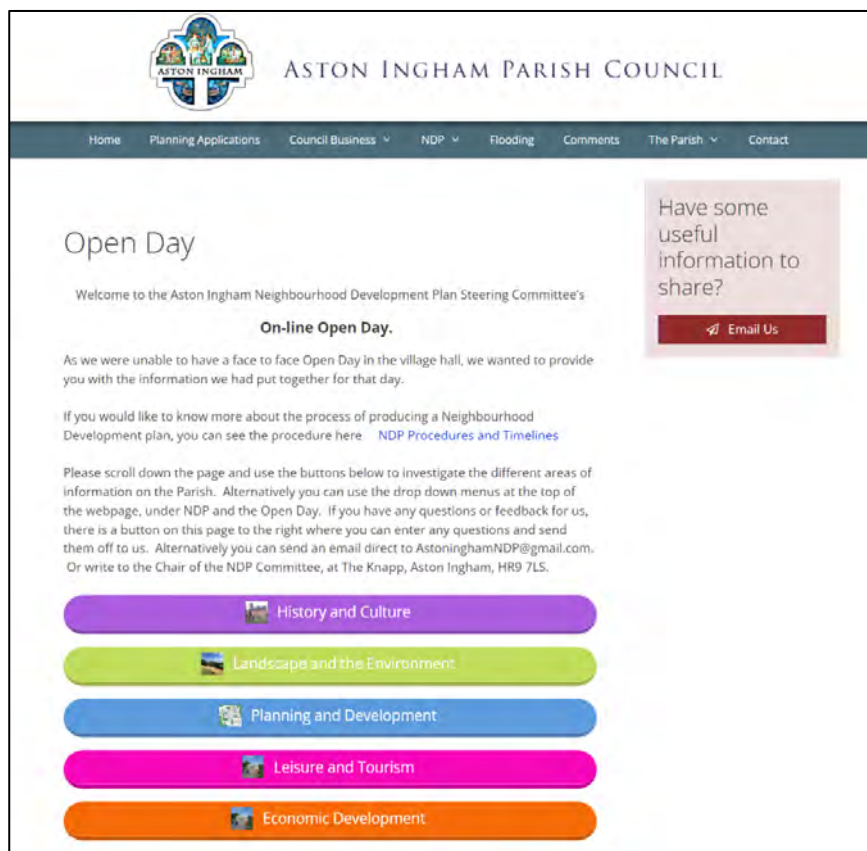
- Making use of the results of earlier consultation held in 2015 for a Parish Plan as a starting point for the NDP.
- Recognising that the NDP was to be developed through consultation, to provide maximum involvement with the community, and using a range of communication methods.
- Understanding the procedures to be followed in preparing the NDP, the nature of the work involved, how best to use volunteers and professional support, and how to fund the process.
- Developing an ambitious yet realistic Vision Statement for the NDP.

2.3 These issues and concerns were considered and addressed by:

- Successful application for Neighbourhood Area designation.
- Seeking and obtaining advice from HC Neighbourhood Planning officers on the neighbourhood plan process, and from other parishes on their experiences.
- The establishment of the Steering Group comprising elected parish councillors and other members, and open to all in the community.
- Developing a Consultation and Communication Strategy.
- Deciding to hold an Open Day to share information and collect community views and opinions at the outset of the process, with a view to carrying out a questionnaire survey of all residents.
- Obtaining grant funding and engaging professional support (a planning consultant was appointed in February 2020).

3. ON-LINE OPEN DAY

- 3.1 The intended Open Day for parishioners could not be held as planned due to the Covid-19 restrictions which came into force in March 2020. Instead, it was decided to make use of the information that was being collected by undertaking an on-line consultation.
- 3.2 The Open Day was publicised in The Chimes and on social media in October and November 2020. The consultation went live in November 2020 at <https://astoninghampc.org/orcop-parish-council/ndp/open-day/>. Printed sets of the information were available for those without internet access. The consultation covered NDP procedures and timelines, and dealt thematically with:
- History and Culture
 - Landscape and the Environment
 - Planning and Development
 - Leisure and Tourism
 - Economic Development
- 3.3 The webpage (screenshot below) included a facility to provide email feedback and a postal address was also provided. Although there was only limited feedback received, the Open Day provided an opportunity to share information with the community ahead of the questionnaire survey in early 2021. The Facebook page received 11 views.



Screenshot of Open Day web page

4. RESIDENTS' QUESTIONNAIRE SURVEY

- 4.1 A comprehensive residents' survey was undertaken in January 2021. In developing the questionnaire, members of the Steering Group took account of issues raised in the earlier consultation undertaken for the Parish Plan. Key themes for the survey were identified as: vision and objectives, environment and heritage, infrastructure and roads, housing, community services and facilities, and economic development.
- 4.2 The questionnaire asked 17 questions on these topics. There was a further opportunity to add comment on any other matters thought to be relevant to the NDP. The survey concluded with five questions seeking information on the demographic profile of respondents, including their gender, age, economic activity and length of residence.
- 4.3 The survey was announced in The Chimes in December 2020. At the start of 2021, 324 survey packs were hand-delivered by volunteers to all households within the Neighbourhood Area. The pack comprised a covering letter, a set of frequently asked questions, a map of the Neighbourhood Area, and the questionnaire. All residents of the Neighbourhood Area aged 16 or over were invited to complete a questionnaire. A contact point was provided to enable any queries from residents to be answered, and to request additional copies of the questionnaire if required.
- 4.4 Completed questionnaires were collected by hand up to mid-February 2021. Completed questionnaires could also be dropped-off at the Village Hall. Distribution and collection were undertaken to be compliant with the prevailing Covid-19 restrictions.
- 4.5 Overall, 210 questionnaires were completed, a response rate of 65%. The results were professionally analysed and published on the website in March 2021 in the form of two reports, the Results Report and the Comment Listings report. These reports and the questionnaire can be seen at <https://astoninghampc.org/aston-ingham-parish-council/ndp/ndp-evidence-documents/>. The survey covering letter and frequently asked questions can be seen at <https://astoninghampc.org/aston-ingham-parish-council/ndp/ndp-consultation-record/>.
- 4.6 The survey results were publicised in the April 2021 edition of The Chimes.
- 4.7 The residents' survey provided a wealth of information for consideration in the preparation of the NDP. Land use and development issues were addressed by the Steering Group and the planning consultant through the formulation of planning policies in the draft NDP. The survey highlighted a number of non-land use issues notably existing conditions in respect of road safety and traffic speeds through Aston Ingham village. These have been addressed in the draft NDP as Community Actions.

5. HOUSING SITE AND SETTLEMENT BOUNDARY CONSULTATION

- 5.1 A Call for Sites was held in March/April 2021 to identify land potentially suitable to allocate for housing. The Call for Sites was publicised by the distribution of a flyer in The Chimes, on social media and the parish notice board. A site submission form was made available as a download from the Parish Council website and on request from the Parish Clerk. The closing date for submissions was 30 April.
- 5.2 The submitted sites were professionally and independently assessed. Two sites at Aston Ingham village were identified as suitable options for further consideration, along with draft settlement boundaries. It was recommended that public consultation on the options be undertaken to guide site selection, and obtain community views on the principles of site development and the settlement boundaries.
- 5.3 A drop-in public consultation was held on 11 September 2021 at Aston Ingham Village Hall. It was publicised by means of a flyer delivered throughout the Neighbourhood Area during late July/August 2021 in The Chimes, on the Parish Council website, and on social media.
- 5.4 A set of display boards were prepared to show the two housing site options, open space and the settlement boundaries, along with background information. These can be seen at <https://astoninghampc.org/aston-ingham-parish-council/ndp/ndp-consultation-record/>. Members of the Steering Group and the planning consultant were on hand to explain the proposals and answer questions. A comment form was devised to capture views through a mix of tick-box or free-write questions.
- 5.5 A total of 53 forms were returned. The results were professionally analysed and the resultant Reports published on the website at <https://astoninghampc.org/aston-ingham-parish-council/ndp/ndp-evidence-documents/>.
- 5.6 The issues and concerns raised in the consultation may be summarised as follows:
- A clear preference for one of the site options, land at Ellsmere, and support for the associated settlement boundary.
 - Site-specific factors including flood risk and access.
 - That no more new housing was needed.
- 5.7 Following due consideration by the Steering Group and Parish Council in October/November 2021, the consultation feedback including issues and concerns raised was addressed by:
- Progressing the allocation of land at Ellsmere as a site for new housing in the NDP, together with the associated settlement boundary.
 - Addressing issues and concerns in NDP policies and Community Actions as far as possible.
- 5.8 Correspondence with the landowner of the option site that was not preferred (land at Aston Bank) took place in 2022. In reply to a letter in February, the Parish Clerk advised that the points made should be re-submitted as a response to the Regulation 14 consultation. The landowner was then consulted at this stage (no comment was received). He sent a second letter in August, and was further advised in September 2022 to make a response to the Regulation 16 stage, following submission.

6. CONSULTATION ON THE DRAFT PLAN

- 6.1 The draft NDP was approved for public consultation by the Parish Council on 3 February 2022. Consultation was carried out in accordance with Regulation 14 of the Neighbourhood Planning (General) Regulations 2012 as amended. The consultation ran for six weeks and one day between 9.00 a.m. on 3 May to 5.00 p.m. on 15 June 2022.
- 6.2 The Environmental Report and the Appropriate Assessment Report which had been provided by HC to the Parish Council in March 2022 were also published for consultation.
- 6.3 The draft NDP included a pre-submission consultation and publicity notice, setting out the requisite details of the consultation and including three contact numbers in the event of any queries. The draft NDP, the consultation and publicity notice, a combined flyer/comments form, the Environmental Report and the Appropriate Assessment Report were posted on the Parish Council website.
- 6.4 The combined flyer/comments form was distributed to households and businesses in the Neighbourhood Area at the start of the consultation period by means of an insert in The Chimes. The form explained how and where the draft NDP could be viewed and invited comments. Further publicity was given by articles in The Chimes for May and June; a poster in the parish notice board, and via social media. Printed copies of the draft NDP were deposited for inspection at the Village Hall, St. John the Baptist Church and the Penny Farthing Inn.
- 6.5 Comments could be made by hand to the Village Hall letterbox or the collection boxes at the Church and the Penny Farthing Inn; by post or email to the Parish Clerk, or at the Annual Parish Meeting (see below).
- 6.6 An initial list of consultees was provided by HC and then added to by the planning consultant and the Steering Group, having regard to the consultation bodies specified in paragraph 1 of Schedule 1 of the 2012 Regulations. The final list is at Table 1. Consultation was by email or letter, sent by the Parish Clerk at the start of the consultation period and explaining where the Plan could be viewed and how and by when to make comments.
- 6.7 The Annual Parish Meeting was held from 7.00 pm on 19 May 2022. It included a presentation and question-and-answer session on the NDP, delivered by the planning consultant. The session was publicised in the NDP Regulation 14 publicity material, including in The Chimes for May 2022, and was designed to provide an overview of the NDP and to give an opportunity for local residents and businesses to seek further details and to make comments. It was attended by 24 parishioners, the HC ward councillor and parish councillors.

Table 1: consultees on the draft NDP

Organisations
Campaign to Protect Rural England
Diocese of Hereford
Dŵr Cymru Welsh Water
English Heritage
Environment Agency
Education Funding Agency
Forestry Commission England
Natural Resources Wales
Hereford and Worcester Chamber of Commerce
Herefordshire Council (Neighbourhood Planning Team and ward councillor)
Herefordshire Nature Trust
Herefordshire Primary Care Trust
National Highways
Historic England
Homes England
National Grid
National Trust
Natural England
Network Rail (West)
Hereford Travellers Support Group
RWE Npower Renewable
Severn Trent Water
The Coal Authority
Western Power Distribution
Woodland Trust
Adjoining Councils
Gloucestershire County Council
Forest of Dean District Council
Linton Parish Council
Lea Parish Council
Gorsley & Kilcot Parish Council
Newent Town Council
Longhope Parish Council
Local consultees
Those who submitted sites to the Call for Sites in 2021
Parochial Church Council
Aston Ingham Village Hall
The Penny Farthing
Aston Ingham Bowls Club
Aston Ingham Scouts
Cricket Club
Those on Parish Council website mailing list to receive Parish updates

7. RESPONSES TO THE CONSULTATION

Issues and concerns raised

7.1 Consultation body responses were received from:

- HC service providers: Neighbourhood Planning, Strategic Policy, Environmental Health, Highways and Transportation.
- Coal Authority (no comment).
- Dŵr Cymru Welsh Water.
- Environment Agency.
- Forest of Dean District Council (no comment).
- Gloucestershire County Council (no comment).
- Herefordshire Campaign to Protect Rural England.
- Historic England.
- National Grid.
- National Trust.
- Sport England (no comment specific to the NDP).

7.2 Comments were also received from eight community respondents. All comments are reported verbatim in the Response Log (Appendix). Personal information and addresses have been anonymised or redacted. A response is provided to each comment and any necessary amendments to the draft NDP are set out.

7.3 The principal issues and concerns which were raised in the consultation may be summarised as follows:

- HC considered that the NDP was in general conformity with the Local Plan Core Strategy, with suggestions made to improve conformity in respect of policies AST2 and AST12.
- The vision, objectives and relevant policies of the NDP were generally supported by the consultation bodies including by Dŵr Cymru Welsh Water, Herefordshire Campaign for Rural England, Historic England, and the National Trust.
- No concerns were raised with regard to nutrient neutrality by HC or the Environment Agency.
- HC and the Environment Agency commented on the implications of land liable to flood for the proposed housing site allocation.
- HC Transportation and Highways suggested amendments to enable and promote active travel.
- Community comments on the proposed housing site allocation were: whether the development would increase flood risk elsewhere, access and traffic implications, and concerns over the potential for adverse impact on activities at the Scout Hut.
- Comments from the landowner of the site focussed on the extent of the area allocated for housing development and the reasonableness of a proposed requirement for traffic calming.
- An agent for a member of the community proposed an amendment to the settlement boundary and the allocation of land for housing.
- Other issues raised in community comments were: lack of social housing, public transport, community facilities, modern design, and wind turbines.

Considering and addressing issues and concerns

7.4 All comments were passed to the planning consultant for review and to provide a recommended response, including amendments to the draft NDP. Table 2 provides a summary of the resulting principal amendments to the draft NDP, in plan order. Full details may be found in the Appendix.

Table 2: Principal changes made to the draft NDP following consultation

Consultee	Change made
HC Highways and Transportation	Vision and objectives: additions to enable and promote active travel.
HC Neighbourhood Planning	Policy AST1: amendment re landscaping schemes proposed as part of new development.
HC Neighbourhood Planning	Policy AST2: minor amendment to improve conformity.
HC Neighbourhood Planning, Environment Agency, 1 st Aston Ingham Scout Group, respondent 5	Policy AST5: amendments to further specify the requirements for a Flood Risk Assessment and that all development should be located in Flood Zone 1.
1 st Aston Ingham Scout Group	Policy AST5: addition of policy criterion to promote effective integration between the proposed new housing and the Scout Hut community facility.
Respondent 8	Policy AST5: amendment to eastern boundary of housing site allocation (Plan 5) and to delete reference to on-road traffic calming and footway improvement scheme as a policy requirement.
HC Neighbourhood Planning	Policy AST5: addition of reference to cycleway provision and to management of land in Flood Zones 2 and 3.
HC Neighbourhood Planning, respondent 2	Policy AST10: reference made to small-scale wind energy development to improve conformity and respond to comments made.
HC Highways and Transportation	Policy AST13: addition of reference to safe off-road active travel links within development.
HC Highways and Transportation	Community Actions CA1 and CA6: additions in respect of walking and cycling improvements.
Respondent 1	Community Action 8: addition of reference to pop-up pub.
Agent for respondent 6	Plan 5: minor amendment to Aston Ingham settlement boundary.

APPENDIX

Regulation 14 consultation Response Log

Abbreviations

AA: Appropriate Assessment (March 2022)

CIL: Community Infrastructure Levy

FRA: Flood Risk Assessment

HC: Herefordshire Council

LPCS: Herefordshire Local Plan Core Strategy adopted 16 October 2015

NPPF: National Planning Policy Framework 2021

NDP: Neighbourhood Development Plan


NPPG: National Planning Practice Guidance

SSSI: Site of Special Scientific Interest

SAC: River Wye Special Area of Conservation

SEA: Strategic Environmental Assessment (March 2022)

Part 1: Comments from consultation bodies

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to draft Aston Ingham NDP
Avison Young for National Grid	NDP	C	<p>National Grid has appointed Avison Young to review and respond to Neighbourhood Plan consultations on its behalf. Following a review of the above document we have identified the following National Grid assets as falling within the Neighbourhood area boundary:</p> <p>Electricity Transmission Asset Description 4YU ROUTE TWR (001 - 078): 400Kv Overhead Transmission Line route: PEMBROKE - WALHAM</p> <p>A plan showing details of National Grid's assets is attached to this letter.</p>  <p>Please note that this plan is illustrative only. National Grid also provides information in relation to its assets at the website below.</p> <ul style="list-style-type: none"> • www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/ <p>Please see attached information outlining guidance on development close to National Grid infrastructure.</p>	<p>This comment identifies an overhead transmission line running south of the village of Aston Ingham. This asset is outside the settlement boundary and will not affect or be affected by any proposed development in the NDP. No change to the NDP is required.</p>	<p>No change.</p>

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to draft Aston Ingham NDP
			<p>Electricity assets</p> <p>Developers of sites crossed or in close proximity to National Grid assets should be aware that it is National Grid policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.</p> <p>National Grid's 'Guidelines for Development near pylons and high voltage overhead power lines' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: https://www.nationalgridet.com/document/130626/download</p> <p>The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.</p> <p>National Grid's statutory safety clearances are detailed in their 'Guidelines when working near National Grid Electricity Transmission assets', which can be downloaded here: www.nationalgridet.com/network-and-assets/working-near-our-assets</p>		
Coal Authority	NDP	C	Our records indicate that there are no coal mining features recorded as being present at surface or shallow depth in the identified Neighbourhood Plan area. On this basis I can confirm that the Planning team at the Coal Authority have no specific comments to make on the Neighbourhood Plan.	Comment noted.	No change.
Dŵr Cymru Welsh Water	NDP	S	We are supportive of the vision and objectives of the NDP, and welcome the reference to the water conservation including at Policy AST3. As you will be aware, aside from a very small public Wastewater Treatment Works (WwTW) at Crews Hill there is no further public sewerage within the NDP area.	Comment noted.	No change.
	Policy AST5	C	With regard to the proposed allocation, I can advise that there are currently water supply issues within the area and as such will be able to advise further	This factor could impact on the timing of the site's development	Add new para. 5.11:

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to draft Aston Ingham NDP
			at the planning application stage as to whether the site can be served by a public water supply without the need to await our regulatory investment.	and should be included in the supporting text to policy AST5.	“Dŵr Cymru Welsh Water have indicated that there are water supply issues within the area and that they will advise at the planning application stage as to whether the site can be served by a public water supply without the need to await regulatory investment.”.
Environment Agency	NDP	C	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 NP 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. We note that there are several ordinary watercourses in the Parish Area which have associated Flood Zones 3 and 2 (the high and medium risk zones as defined by our Flood Map), these are identified in Plan 3 on page 12 of the consultation draft. Please note that other potential development areas may be at flood risk given the presence of ‘ordinary watercourses’ which are un-modelled based on the scale and nature of the stream and receiving catchment (less than 3km2).	Comment noted.	No change.
	Policy AST5	C	We note that there is a site submitted ‘Land at Ellsmere, Aston Ingham’. The western extent of the site borders onto the Ell Brook (an ‘ordinary watercourse’), which has associated Flood Zones 2 and 3. There is also a tributary to the Ell Brook that runs to the north of the site, this ordinary watercourse is not modelled by the Environment Agency flood map. As part of any detailed proposals for this site we would expect all development to be located within the Flood Zone 1 portion of the site, this may require some modelling of the tributary to confirm the Flood Zone 1 extent of the site. Should this allocation be progressed; a Flood Risk Assessment (FRA) would need to accompany any forthcoming planning application to confirm the above in accordance with National Planning Policy and Herefordshire	Amendments are proposed to policy AST5 and supporting text to further specify the requirements for an FRA and for all development to be located in Flood Zone 1.	See consolidated amendments to policy AST5 and supporting text in Appendix B.

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to draft Aston Ingham NDP
			Council's Core Strategy (Policy SD3). 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 Herefordshire Councils drainage team as the Lead Local Flood Authority (LLFA).		
	Policy AST2	C	It is noted that Aston Ingham 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 allocation in the NDP in discussion with Herefordshire Council. We have previously provided comment on similar NDPs' with a view to ensuring a robust submission and that development can be achieved without impact on the integrity of the SAC, primarily within the Lugg Catchment. In this instance, as stated above, Aston Ingham 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.	Comment noted. As explained in the draft NDP at paras. 2.19 and 2.20 the majority of the Neighbourhood Area drains to the east towards the Rivers Leadon and Severn. A small part of the Neighbourhood Area west of Crews Hill drains via the Rudhall Brook to the River Wye, which is recognised internationally as a SAC due to the flora and fauna it supports. Aston Ingham village and the proposed site allocation are not in the Lower Wye catchment. The draft NDP includes in policy AST2 a requirement that any development draining to the Lower Wye catchment must be shown not to have an adverse effect on the River Wye SAC.	No change.
Forest of Dean District Council	NDP	C	Thank you for the above consultation, I have no comments I wish to make.	Comment noted.	No change.
HC Neighbourhood Planning	NDP	C	The plan is structured and written well, and the objectives and policies set out are clear. Overall it appears the plan is in general conformity with the Local Plan Core Strategy. Pleased to see the plan has incorporated nutrient neutrality measures within policies AST2. [NB no comments received from the following HC service providers: Development Management, Environmental Health (noise),	This support for the NDP is welcomed.	No change.

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to draft Aston Ingham NDP								
			Landscape/archaeology/conservation, Economic Development, Education, Property Services, Parks and Countryside, and Waste].										
	Policy AST5	C	The western edge of the allocated housing site is liable to flooding. It is recommended for the area of the site that falls in flood risk 3 to avoid development in this area, maybe this could be used as greenspace/or partially retained as river meadows? It is good to see mitigation measures have been included within Policy AST5 4. Point 3 of policy AST5-Has this considered specifically including a cycleway or cyclists?	In response to this comment and that by the Environment Agency amendments are proposed to policy AST5 and supporting text to further specify the requirements for an FRA and for all development to be located in Flood Zone 1. Reference is to be made to the future use of Flood Zone 2 and 3 land as suggested. The footway provisions within the site are to be extended to include cyclists, this also being in line with comments below by HC Transportation.	See consolidated amendments to policy AST5 and supporting text in Appendix B.								
	Policy AST8	C	It would be helpful if these places were mapped, however this can be addressed by the regulation 16 Policies Maps.	Comment noted.	No change.								
HC Strategic Policy	NDP	C	Overall the plan is in general conformity with the Local Plan Core Strategy. There are comments to enhance the plan and improve conformity for AST2: Biodiversity and AST10: Renewable and low carbon energy.	Response to comment on policy AST1: the policy does deal with this issue in requiring landscaping proposals to be compatible with and consolidate landscape character. An amendment is proposed to clarify the intent. Response to comment on policy AST2: an amendment is made to fully align the policy with NPPF para. 180b. Response to comment on policy AST10: the NDP is not proposing to identify a site for wind energy	Amend last sentence of policy AST1 to read: "Schemes for new landscaping put forward as part of development proposals should be compatible with and serve to consolidate the established landscape character, and include details of arrangements for their maintenance and management." Amend second para. of policy AST2 by deleting "public". Amend policy AST10 to read:								
			<table border="1"> <thead> <tr> <th>Draft Neighbourhood plan policy</th> <th>Equivalent CS policy(ies) (if appropriate)</th> <th>In general conformity (Y/N)</th> <th>Comments</th> </tr> </thead> <tbody> <tr> <td>AST1 Landscape</td> <td>SS1, LD1, LD2.</td> <td>Y</td> <td>However, no mention of importance of incorporating new landscape schemes and their management.</td> </tr> </tbody> </table>	Draft Neighbourhood plan policy	Equivalent CS policy(ies) (if appropriate)	In general conformity (Y/N)	Comments	AST1 Landscape	SS1, LD1, LD2.	Y	However, no mention of importance of incorporating new landscape schemes and their management.		
Draft Neighbourhood plan policy	Equivalent CS policy(ies) (if appropriate)	In general conformity (Y/N)	Comments										
AST1 Landscape	SS1, LD1, LD2.	Y	However, no mention of importance of incorporating new landscape schemes and their management.										

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received				Response	Amendments to draft Aston Ingham NDP
			AST2 Biodiversity	SS1, LD2, LD3.	Y/N	NDP policy states that development which affects SSSIs will be allowed only when development's public benefits outweigh the impacts on conservation status. The CS states that devs liable to harm SSSIs if material considerations are sufficient to outweigh nature conservation considerations. According to this article, benefits to the community is not a material consideration: Supreme Court: community benefits not planning 'material consideration' (pinsentmasons.com)	development, so on this count policy SD2 will not be met and hence any such schemes will not be granted planning permission. However acceptable proposals for small-scale (e.g. single turbine) wind energy generation could still arise in the Neighbourhood Area if the requirements of policy AST10 were met. An amendment is made to policy AST10 to reflect this possibility.	"Renewable and low carbon energy proposals including small-scale wind energy development ...".
		AST3 Building design	SD1 – SD4.	Y	N/A			
		AST4 Aston Ingham village settlement boundary	LD1.	Y	N/A			
		AST5 Land at Ellsmere,	SS2, SS3, OS1, OS2, LD1 – LD3.	Y	N/A			

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received				Response	Amendments to draft Aston Ingham NDP
			Aston Ingham					
			AST6 Housing mix	H3.	Y	N/A		
			AST7 House- holder develop- ment	N/A	Y	N/A		
			AST8 Community facilities	SS1, SC1.	Y	N/A		
			AST9 Communi- cations infrastruc- ture	SS1, E3, RA6, ID1.	Y	N/A		
			AST10 Renewable and low carbon energy	SS1, SS7, SD2.	Y/N	AST10 suggests that wind energy will not be supported in Aston Ingham, however Policy SD2 in the Core Strategy states that wind energy may be supported if a site is both identified in a development plan document and it can be shown that the planning impacts can be fully addressed and that a scheme has backing of local community.		

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to draft Aston Ingham NDP												
			<table border="1"> <tr> <td>AST11 Surface water and flood risk</td> <td>SS1, SD3, LD3.</td> <td>Y</td> <td>N/A</td> </tr> <tr> <td>AST12 Small-scale employment</td> <td>SS1, SS5, E1 - E4, RA5, RA6.</td> <td>Y</td> <td>N/A</td> </tr> <tr> <td>AST13 Agricultural and forestry development</td> <td>RA4, RA5, RA6.</td> <td>Y</td> <td>N/A</td> </tr> </table>	AST11 Surface water and flood risk	SS1, SD3, LD3.	Y	N/A	AST12 Small-scale employment	SS1, SS5, E1 - E4, RA5, RA6.	Y	N/A	AST13 Agricultural and forestry development	RA4, RA5, RA6.	Y	N/A		
AST11 Surface water and flood risk	SS1, SD3, LD3.	Y	N/A														
AST12 Small-scale employment	SS1, SS5, E1 - E4, RA5, RA6.	Y	N/A														
AST13 Agricultural and forestry development	RA4, RA5, RA6.	Y	N/A														
HC Environmental Health (Environmental Protection – air, land, water protection, contaminated land)	NDP	C	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.	Contamination is a material planning consideration and is addressed within the NPPF and LPCS policy SD1. Proposals coming forward as planning applications will be considered under the existing planning policy framework. No further reference is needed in the NDP.	No change.												
	Policy AST5	C	Having reviewed Ordnance survey historical plans, I would advise the following regarding ‘Policy AST5: Land at Ellsmere, Aston Ingham’ indicated in grey on plan 5 that has been allocated for housing development:	NDP para. 5.10 already addresses this point.	No change.												

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to draft Aston Ingham NDP
			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.		
HC Transportation and Highways (Development Control)	NDP	C	<p>When submitting development plans, developers need to assess the impact the proposals will have on the existing highway. This should include active modes of transport with walking and cycling the highest priority. The site assessment should be related to size of the development. Large developments and/or developments which may have a severe impact on the highway should submit a Transport Assessment/Statement to meet the following criteria, Department for Transport guidance, Manual for Streets 1/2, and Herefordshire Council Highways design guidance. Early engagement on larger development through the Herefordshire Council's Pre application planning service is strongly advised. Any site which it is assessed to have its impact on the highway classed a severe should look at mitigating the impact. Herefordshire Council's Core strategy highways policies associated with development are as follows:-</p> <p>MT1 - Traffic management, highway safety and promoting active travel SS4 - Movement and transportation</p> <p>Every site should look to promote walking and cycling, this could include but it's not limited to the following, connections to existing footway/cycleways, provision of new footways/cycleways, connections to bus stops where possible. Cycle storage should meet HC guidance and should be provided to be secure, covered and individual. Businesses can also promote cycling by the provision of showers, changing facilities and lockers as well cycle storage. Connections and improvements to the National cycle route network where possible. A site of any size should be able to accommodate parking and turning within the designated site area. Parking and turning should meet Herefordshire Council design guide specifications.</p>	These are standard highway requirements for development proposals, already set out in the development plan in LPCS policies SS4 and MT1. These strategic policies are signposted in the NDP at para. 6.10. The requirement for a Transport Assessment (or Statement) is highlighted in NDP policy where relevant (policies AST5 and AST13). Walking and cycling are promoted in policies AST3, AST5, AST8 and AST12. Further support for walking and cycling will be given through amendments proposed in response to HC Transportation and Highways (Active travel) see below.	No change.
	Policy AST5	C	It is noted that this site is proposed for 5 dwellings, however the NDP states that it will be connected to an on road traffic calming and footway improvement. Details of a traffic calming scheme should be included in any proposed development, as these will need separate approval.	Following consideration of responses received, the scheme referred to is no longer to be progressed as a policy requirement.	See consolidated amendments to policy AST5 and supporting text in Appendix B.

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to draft Aston Ingham NDP
HC Transportation and Highways (Active travel)	NDP	C	Despite the scarp climb, the parish is on the alignment of a potential Ross-on-Wye to Newent via Bromsash and Clifford's Mesne quieter route alternative to main roads. Measures that support the calming of traffic speeds (noted earlier in para 2.10) on the B4222 would help in realising this route.	The link between traffic speed and cycle routes could be recognised in the relevant Community Action.	Add to CA6: "Walking and cycling along the B4222 will also be promoted by traffic speed reductions (see CA1).".
	Vision	C	Could include aspirations to enable and promote active travel as a realistic travel option in and around the parish?	Agreed.	Amend Vision first bullet point to read: "... where local facilities support health, social and cultural well-being and where walking and cycling are realistic travel options; and". Amend Objectives seventh bullet to read: "and to improve connectivity wherever possible including by enabling and promoting active travel.".
	Policy AST3	C	Para 4, and taking every available opportunity to enable and promote walking and cycling.	The policy already includes this suggested wording.	No change.
	Traffic and transport	C	Traffic and transport, para 6.9 – seems a little out of place as also implied by the need for footnote 14. A transport policy statement here would help developers and planners to address the transport implications of land use, many of which were identified as issues in the consultation and earlier paragraphs (eg 2.10). Of course, would expect to see enabling and promoting active travel in this policy too.	The NDP addresses the transport implications of land use and promotes active travel throughout, in the Vision, objectives, policies AST3, AST5, AST8, AST12, and AST13, and Community Actions (taking into account proposed amendments). NDP para. 2.10 deals with traffic speed and volume, matters which are not within the scope of the NDP (see Community Action CA1).	No change.
	Policy AST13	C	Having identified the intimidating experience of trying to get about by active travel, this policy could offer an opportunity to redressing this by including	Agreed. Policy AST 13 criterion 4 already refers to public rights of	Add to policy AST13 criterion 4:

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to draft Aston Ingham NDP
			off-road routes – would be a shame to miss it, so suggest, e.g. between 1 & 2, opportunities to deliver off-road active travel links. A companion Community Action could be written into CA1 & is already alluded to, but could be reinforced, in CA6 on p 43.	way so the suggested reference could conveniently be included at this point.	“The provision of safe off-road active travel links within developments is encouraged; and”. Add to CA6: “This includes the delivery of safe off-road active travel links in association with development or as other opportunities arise.”.
Gloucestershire County Council	NDP	C	I can confirm that we have no comments to make on the document.	Comment noted.	No change.
Herefordshire Campaign to Protect Rural England	NDP	S	The plan is easy to read, clear and comprehensive. We are very pleased to see policies included which HCPRE believe will help to protect your countryside and environment by: <ul style="list-style-type: none"> Identifying and stipulating ways to protecting unique characteristics of the area eg 'dark skies', tranquillity, distinctive landscapes and settlement patterns Protecting the broad sweep of landscapes by identifying key views Including policies to avoid the adverse impact of development on the environment and biodiversity Stipulating inappropriate locations for all kinds of development including housing, energy generation and - economic activity including large scale agriculture and forestry. 	This support for the NDP is welcomed.	No change.
	Policy AST13	C	Point 3 using the word 'undue' opens the policy up to ambiguous interpretation – consider using unacceptable instead? Also suggest adding 'and odour' after 'air pollution'.	The Cambridge Dictionary defines undue as “to a level that is more than is necessary, acceptable, or reasonable”. It is felt to be an appropriate term to use in policy. Substituting unacceptable introduces ambiguity – unacceptable to whom? The inclusion of reference to odour is agreed.	Amend policy AST13 criterion 3 (second occurrence) to read: “...traffic, or noise and air pollution including odour; and”. Re-number policy criterion sequentially.

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to draft Aston Ingham NDP
	Policy AST3	C	Point 3 final sentence 'External Lighting should avoid undue adverse impacts'. Consider using 'unacceptable' rather than 'undue' – reasoning as for AST13 above.	See above.	No change.
Historic England	NDP	C	Thank you for the invitation to comment on the above Neighbourhood Plan. Historic England is supportive of both the content of the document and the vision and objectives set out in it. The commitment to support well designed locally distinctive development that is sympathetic to the character of the area including its rural landscape character, views and biodiversity is commendable. The recognition of the importance of Historic Farmsteads being sustainably and sensitively converted is also welcomed. Overall the plan reads as a well-considered document which Historic England considers is a good example of community led planning. Beyond those observations we have no further substantive comments to make.	Comment noted.	No change.
National Trust	NDP	S/C	The National Trust is a conservation charity that looks after nature, beauty and history for the nation – for everyone, for ever. The Trust owns land in the south-eastern corner of the parish (May Hill Common), linked to our May Hill landholding in Gloucestershire / Forest of Dean. In response to the draft neighbourhood plan, we appreciate and support the importance placed on rural character and on the need for developments not to impact negatively on biodiversity. In addition, we support the inclusion of key views KV4 and KV5 – from the public highway and parking area at the northern edge of May Hill Common. There are wide ranging views to the east and north, across the parish, from this location. Finally, there are also scenic rural views towards the parish from various points on May Hill Common and summit (in Gloucestershire). Whilst it is unlikely that these views would be impacted by development in the parish, it may be worth mentioning these wider views within the plan.	This support for the NDP is welcomed. Wider views from May Hill are already referred to at para. 2.2.	No change.
Sport England	NDP	C	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,	Comment noted.	No change.

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to draft Aston Ingham NDP
			<p>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.</p> <p>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</p> <p>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</p> <p>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.</p> <p>Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the</p>		

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to draft Aston Ingham NDP
			<p>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</p> <p>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/</p> <p>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.</p> <p>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.</p> <p>Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.</p>		

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to draft Aston Ingham NDP
			<p>NPPF Section 8: https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities</p> <p>PPG Health and wellbeing section: https://www.gov.uk/guidance/health-and-wellbeing</p> <p>Sport England's Active Design Guidance: https://www.sportengland.org/activedesign</p> <p>(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.)</p> <p>If you need any further advice, please do not hesitate to contact Sport England using the contact details below.</p>		

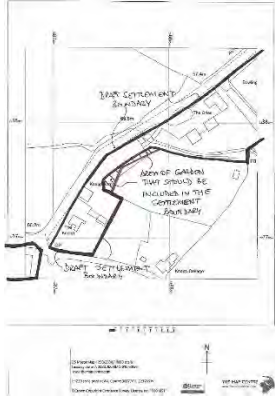
Part 2: Community and other comments

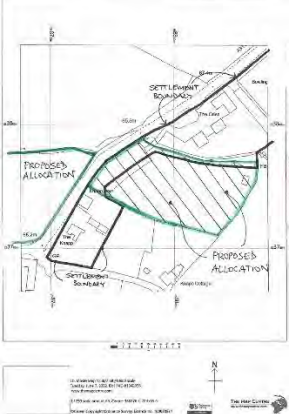
Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to draft Aston Ingham NDP
1 st Aston Ingham Scout Group	Policies AST4, AST5 and AST11	O	<p>These comments relate to Policies AST4: Settlement Boundary, the associated Policy AST5: 'Land at Ellesmere and Policy AST11: Surface water and flood risk. Comments have arisen from an Extraordinary General Meeting of the Aston Ingham Scout Group Executive to discuss the proposed development on land known as 'Ellesmere' adjacent to the Scout Hut and its surrounds.</p> <p>Of paramount importance is the safety of young people using our Scout Hut and surrounding grounds. The proposed development of the adjacent Ellesmere site poses an increased and unacceptable risk to Safeguarding and Child Protection of the young people undertaking activities at our site. The Scout Hut is a single story building within a plot separated from Ellesmere by the Ell Brook which is easily crossed at most times of the year. Our first objection is therefore due to the unacceptable impact on Protection and Safeguarding of our young people arising from the development.</p> <p>Since the onset of Covid 19, we have significantly improved the interior and outside facilities of the Scout Hut and now hire it out to Scout/Guiding groups countrywide for camping during the weekends and school holidays. This means that currently scouting activities are able to take place around the clock and throughout the year without disturbing neighbours due to the seclusion of the site.</p> <p>Our Scout hut and surroundings has been an established site for Scouting activities for over five decades enjoying the benefits of seclusion and inherent safety of being on the edge of the village. Scouting provides valuable Youth Development in our rural area.</p> <p>In relation to Policy AST11, we are extremely concerned that excess surface water from any new housing development will seriously affect the flooding and pollution risks to our site. A substantial part of the proposed development is in Flood Zone 3 and rated as having a high risk of flooding. During heavy rainfall, the land around the Hut is often under flood water. Our hut is built on a substantially raised plinth to prevent flooding of the building, the height of which was determined from the flooding records up to the time of construction in around 1970. Weather records from the past decade show clearly that climate change has resulted in far more extreme rainfall events the frequency of which is likely to continue to increase. Hence any development on land in</p>	<p>The NPPF requires new development to be integrated effectively with existing community facilities, which should not have unreasonable restrictions placed on them as a result of development permitted after they were established (para. 187). In this case, the concerns appear to be the potential for noise complaints from residents of new dwellings on Ellsmere and a risk to safeguarding seemingly linked to the proximity of the development. New dwellings on Ellsmere will be some distance from the Scout Hut, in particular due to the intervening land in Flood Zones 2 and 3 which is not to be developed. Bankside vegetation along Ell Brook will provide visual screening. These factors will naturally limit the potential for the impacts of concern. In addition, the siting and orientation of the new dwellings could further ensure effective integration, and a suitable criterion is to be added to policy AST5.</p> <p>In respect of flood risk, the draft site allocation policy requires</p>	<p>See consolidated amendments to policy AST5 and supporting text in Appendix B.</p>

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to draft Aston Ingham NDP
			the vicinity of the site is likely to result in an unacceptable flooding risk to our hut. Whilst the Aston Ingham Scout Group is in favour of additional family houses within the parish and surrounding district, from the above considerations, we feel strongly that the Ellesmere site is unsuitable for the proposed development.	submission of an FRA to demonstrate that the development will not increase flood risk elsewhere. In response to comments from the Environment Agency and HC, amendments are proposed to policy AST5 and supporting text to further specify the requirements for an FRA and for all development to be located in Flood Zone 1.	
Respondent 1	Housing requirement and delivery	C	There are no plans for social housing and other housing is not affordable.	The level of growth proposed on the allocation site is below the threshold for requiring affordable housing under national policy. Policy AST6 will promote a mix of housing sizes and types with an emphasis on smaller family housing and housing to meet the needs of older people.	No change.
	Para. 2.12.	C	Bus route 32 has stopped so you can only get a bus from Newent or Lea, not Gorsley.	Para. 2.12 to be updated to reflect this position.	Update para. 2.12 as to the nearest public transport provision.
	Policy AST8 and para. 6.3.	C	Can we have a pop-up pub in the village hall please.	Such a provision is unlikely to be in scope of the NDP, but if planning permission is required policy AST8 would apply. Community Action CA9 supports an expansion of community facilities and this could also include reference to a pop-up pub.	Add to CA9: "A community initiative to establish a pop-up pub at the Village Hall will also be supported."

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to draft Aston Ingham NDP
Respondent 2	Para. 4.11	C	Section 4.11 cites evidence that only 12% of the respondents preferred modern or innovative designs. This is a misleading statement. The wording of the question was 'Which of the following are the 4 MOST important for any new houses in the Parish?' You can't legitimately conclude from the survey anything about peoples preferences, for or against, modern design. You can conclude only 12% of people thought it was one of the 4 most important items when new houses are built. It should be noted that 'in character with local area' includes a number of 'modern or innovative' designs as has been noted by Herefordshire planning on (for example) our submission. Therefore the commentary may give the misleading impression that somehow the clause in the policy prohibits modern building when Herefordshire planning have previously agreed 'in keeping' does not, as the area is already populated with modern buildings. I personally consider that a good thing.	Policy AST3 is silent on modern or innovative design, the key test being for schemes to be in character with adjoining development. For the avoidance of doubt, the sentence referred to in the comment should be deleted.	Delete final sentence of para. 4.11.
	Policy AST10	C	Policy AST 10 does not seem to be supported by the survey or the evidence base regarding it's comment about wind turbines. The only reference to 'Wind' in the survey was one supportive comment and I can find no other references in the published evidence. I would propose It should be left open that small scale (e.g. household) wind turbines can be considered where they don't already fall under permitted development. There are plenty of sites suitable for such development in the area, a few may fit under permitted development (e.g. my property has such a potential site) but most won't but remain possible with planning permission. Given the Parish council and Herefordshire council has accepted there is a climate emergency it seems unwise to close off a route towards sustainability without evidence. This point is not to advocate large scale wind turbines but to ask that the policy does not shut down smaller scale domestic turbines, on suitable sites, that may require planning permission.	See response to comment on this policy by HC Strategic Policy.	See amendment to policy AST10 following comment by HC Strategic Policy.
Respondents 3 and 4	Chapter 5 Housing, land at Ellsmere	S	Supporting.	This support for the NDP is welcomed.	No change.
	NDP	S	Very full and impressive document.		

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to draft Aston Ingham NDP
Respondent 5	Policy AST5	O	Unless it can be reasonably guaranteed that this proposed development will in no way add to the existing (and seemingly increasing) flood risk to existing properties near the brook, it ought not to proceed. Quite apart from the loss of a charming field, I find it disappointing that land next to a watercourse which floods has been identified for development. I trust that any survey will look beyond out of date flood risk maps and take into account both recent flooding trends and likely future increases on flood levels and intensity of rainfall/duration of rainfall.	The draft site allocation policy requires submission of an FRA to demonstrate that the development will not increase flood risk elsewhere. In response to comments from the Environment Agency and HC, amendments are proposed to policy AST5 and supporting text to further specify the requirements for an FRA and for all development to be located in Flood Zone 1.	See consolidated amendments to policy AST5 and supporting text in Appendix B.
Paul Smith Associates for Respondent 6	Policy AST4	O	<ol style="list-style-type: none"> 1. Respondent 6 of [REDACTED] wishes to make the following representations on the housing section of the draft Aston Ingham Neighbourhood Development Plan (NDP). Settlement Boundary 2. Respondent 6 supports Draft NDP Policy AST4: 'Aston Ingham village settlement boundary' in identifying a settlement boundary. 3. However, Respondent 6 notes that the draft settlement boundary inaccurately describes and underestimates her residential curtilage by excluding garden area. An OS Extract of her property is attached with the portion of her garden area excluded from the draft settlement boundary (see cross-hatched in red). An aerial photograph is also provided from which the extent of the garden marked by fencing is easily seen. 	The draft settlement boundary follows a boundary line on the OS base. However Google maps satellite view confirms the boundary is as shown in the representation and there is no objection to this minor adjustment.	See consolidated amendments to Plan 5 in Appendix B.

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to draft Aston Ingham NDP
			 <p data-bbox="618 719 1368 799">4. Respondent 6 requests the settlement boundary to be redrawn to accurately represent the extent of her residential curtilage in later version of the NDP.</p> <p data-bbox="618 804 1368 948">5. In support of her contention, attention is drawn the Herefordshire Council's Neighbourhood Planning Guidance Note 20 'Guide to Settlement Boundaries' (June 2015). This guide details, amongst other things, what criteria should be used to delineate an appropriate settlement boundary for a village in a NDP.</p> <p data-bbox="618 952 1368 1182">6. One of the criteria recommended by the guide are "Physical features – wherever possible try to allow the boundaries to follow physical features such as buildings, field boundaries or curtilages. However, in order to conserve the character, settlement boundaries can exclude large gardens, orchards and other areas". Respondent 6's suggested enlargement of the draft settlement to include all her garden would be relative modest in extent but would be make the settlement boundary more accurate of on-site features and compliant with the Council's guide.</p>		
	Proposed housing site allocation on land adjoining Knapp Barn, Aston Ingham	O	<p data-bbox="618 1222 1368 1334">7. Respondent 6 promotes a housing allocation on her land either in addition to that allocated in the draft NDP (west of Knapp Barn) or as an alternative. An OS Extract is attached with the proposed housing allocation outlined in green and cross-hatched.</p>	This proposed housing allocation has been assessed and the results reported in the Housing Site Assessment Addendum (July 2022). The assessment identifies highway access, pedestrian	No change.

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to draft Aston Ingham NDP
			 <p data-bbox="622 743 1384 1031"> 8. In support of this proposed housing allocation, Respondent 6 identifies the western section of land comprises her residential curtilage which has mainly been included in the draft settlement boundary (for details - see above). Further any new housing in the less elevated mid- and western sections of this area of land would lie between new housing development to the immediate north-east and housing and their gardens to the south-west and south. 9. Respondent 6 asks that the NDP team considers her representations on the draft NDP. Should the team have any queries, please contact me and I should be able to respond to all queries raised. </p>	<p data-bbox="1408 320 1744 488">connectivity and ecological constraints affecting the site, which as a result is not to be progressed as a site allocation in the NDP. See the HSA Addendum for more details.</p>	
Respondent 7	Policy AST5	O	<p data-bbox="622 1070 1384 1126">Entrance on bend – traffic hazard and dangerous exit. Increased flood risk should be comprehensively addressed before anything built.</p>	<p data-bbox="1408 1070 1744 1385">Highway access to the site is available from the B4222 to the south away from the bend and the Oaks Lane junction. The draft site allocation policy requires submission of an FRA to demonstrate that the development will not increase flood risk elsewhere. In response to comments from the Environment Agency and HC,</p>	<p data-bbox="1767 1070 2141 1150">See consolidated amendments to policy AST5 and supporting text in Appendix B.</p>

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to draft Aston Ingham NDP
				amendments are proposed to policy AST5 and supporting text to further specify the requirements for an FRA and for all development to be located in Flood Zone 1.	
Respondent 8			See Appendix A.		

Appendix A: Comment from Respondent 8 and response

Comment received

I am writing in response to the invitation to comment on the draft NDP under Regulation 14, and as owner and potential developer of the site known as Ellsmere, I wish to respond to concerns raised on the nature of the site, highlight a number of issues relating to relevant draft policies, and make clear my views on other points arising.

I believe that the area proposed for development currently has limited ecological value. The sward was pretty much destroyed in 1987 - 1989 when pigs were kept on the land, and intensely grazed by horses up until 2005 resulting in dock and nettle infestations which had to be controlled by herbicide spraying over a number of years. Even today, the density of undesirable species is above average and control measures continue on an annual basis. The area was under a Countryside Stewardship agreement with Natural England from 2010 to 2020, and was classified as EK2 (permanent grassland with low inputs), the lowest classification on my holdings.

As regards biodiversity, there is a small patch of wild daffodils in the orchard part (by the electricity pole) and snowdrops along the bank of the Ell, but these would be unaffected by the proposed development. Otherwise, there is an unremarkable crop of dandelions each year, for which I have been criticised by parishioners. However, there are plans to sow wildflowers in the proposed community orchard (subject to consultation/agreement with the ecology officer at Herefordshire Council) as part of the development mitigation plans.

Throughout the period of the Countryside Stewardship scheme, I carried out a significant number of conservation projects with the assistance of Natural England, including restoring an historic threshing barn and seeding a wildflower meadow from Aston Ingham meadows SSSI, all with the intention of benefitting the ecology of the local area.

Concerns have also been raised over the potential impact of the development on the Aston Ingham meadows SSSI, but whilst acknowledging that Natural England will need to be consulted, I can't see that this will present any major issues. The Orles development is immediately adjacent to and slightly overlaps the eastern boundary of the SSSI, on the opposite side of the road and on higher ground, but Natural England's only concern was that the discharge of the outflow from the proposed packaged sewage treatment plant should be discharged to a soakaway system to reduce indirect discharges of phosphates. I believe that this was subsequently amended as the soil conditions were unsuitable (as would probably be the case for Ellsmere), and the outflow now discharges directly into the stream on the boundary of the site. Ellsmere is on the other side of the same stream, over 138 metres away from the SSSI at its nearest point and topographically remote, and any treatment plant outflows, which would be very small in volume, would probably be discharged directly into the Ell brook close to where the Severn Trent sewage works currently discharges, 234 metres from the SSSI boundary.

Regarding the proposed development site, and the proposed development boundary in particular, I would make the following comments.

In the initial 'call for sites' submission, the area earmarked for development was considered appropriate in terms of the scale and siting of the scheme, within the overall concept as envisaged at that time. However, since then, additional information has become available, firstly the flooding which occurred in the village on the 23rd December 2020 revealing the area of the site at risk, and secondly, the draft NDP policies which have now been published, giving details of requirements which will need to be taken into consideration. This poses the question of whether the development area as currently defined needs to be re-assessed.

I have been closely involved with flooding issues in the village, and witnessed the events of the 23rd December 2020 at first hand. Consequently, one objective that I have for the Ellsmere site is that no development should take place within a flood zone, and this approach is in line with policy AST11 which requires the effective management of flood risk as well as surface water drainage. If development in a flood zone was unavoidable, it would be minimised and limited to Flood Zone 1.

Policy AST3, which I support in concept and in ambition, requires the development to achieve a high quality, sustainable design, mentioning specifically the need to respect the character of the adjoining development in terms of siting, density, building-to-building distances, private amenity space and landscaping, as well as sustainability measures such as renewable energy generation – all this in the context of the local settlement pattern which is described in paragraph 5.4 as 'scattered development'. It would also be desirable to be able to blend the transition between the residential area and the orchard rather than have a linear demarcation line, so the need for adequate space for development is very evident.

In addition, a key objective is to mitigate the effects of residential development on the site as far as is reasonable and practicable, and hence to meet the requirements of draft policy AST2. This has its own spatial implications.

There is also a requirement for sufficient room for spatial planning. You will be aware from previous correspondence and discussions that my ambitions for this site go way beyond development for financial gain, and form a major part of legacy planning for the benefit of the village. From the outset, the objective has been to produce a scheme which will be recognised as one of real quality which will not only go some way to meeting the housing requirements of the parish, but will also provide substantial benefits for the community.

If a scheme of real quality is to be delivered, the various professionals and consultants who will make up the development team will need to have sufficient space to work with, so that creative and innovative designs and features can be incorporated. In addition, I recognised from the outset that development on this site would raise concerns with many parishioners, which is why I resolved to adopt a collaborative approach to the design of the scheme. In this way, the concerns and preferences of parishioners, and particularly local residents, could be taken into account where possible, an approach which requires space for a number of options, so that a degree of choice can be offered.

There is therefore likely to be a strong correlation between the amount of space allocated for development and the degree of success in meeting NDP policy objectives and the preferences of stakeholders. It is unlikely that the current development area, with the relatively narrow east-west dimension between the edge of the flood risk zone and the proposed settlement boundary and with its north/south orientation, will allow the full potential of the site to be realised.

However, there are clearly limits to any extension of the development area, with likely concerns over disruption to the biodiversity of the existing orchard and the potential loss of amenity to local properties. Perhaps an acceptable compromise would be to expand the boundary towards the east to the second line of fruit trees, as the trees along the existing boundary are in poor health and would not be a loss in ecological terms. This would enable a less restrictive design-led approach to the site whilst remaining in-line with the original concept of the scheme, and I can't see any justification for not extending the development boundary in this way, as the potential benefits clearly outweigh any perceived negatives and not all the additional space may be needed (if any). The safeguards built into the planning application process and my long-term commitment to the future of the parish should give the necessary assurances to anyone who may be apprehensive about the development plans.

It is surprising that an additional requirement has appeared in the form of traffic calming to complement the pedestrian footpath. A very generous package of community benefits is already envisaged, far in excess of what would normally be appropriate (or even, perhaps, financially viable) for a development of this size, and yet another benefit is being demanded. This fails the test of reasonableness, bearing in mind that the footpath proposed under the Ellsmere scheme already makes a major contribution to pedestrian/road safety within the village. Traffic calming measures are particularly unjust in the context of The Orles development of three four-bedroom houses and one five-bedroom house, for which no community benefits were received at all. It was originally suggested that The Orles should fund traffic calming and a village footpath, but whilst the footpath proposal was discounted because of lack of sufficient room alongside the road, it would appear that the traffic calming opportunity was never followed up by the councillors who were eligible to consider the application.

Informal discussions with Herefordshire Council indicate that there would be a number of major issues with installing any form of physical traffic calming measures on the B4222, and that any such measures which the development could be required to provide would almost certainly need to be directly related (proportionate) to the impact of the development on the local road network, which is 'likely to be minimal' for a scheme of 5 houses or less. It was emphasised that it is Herefordshire Council's responsibility to specify any highway requirements as part of the determination of any planning application, and it will be interesting to see whether Herefordshire Council considers that a traffic calming scheme along the lines suggested meets the statutory tests set out in regulation 122.

However, if the Ellsmere development was required to fund any physical traffic calming measures in full, as policy AST5 (3) of the NDP appears to suggest, the significant additional costs could well necessitate a review of the original scheme concept, requiring the adjustment of other scheme benefits in order to balance the books, which would be unfortunate. This would particularly be the case if, following technical site assessments and the scheme design process, it becomes apparent that fewer than five dwellings would be more appropriate for the site. Consequently, I feel that it is not reasonable or equitable for traffic calming, in addition to the public footpath, to be enshrined in policy in the NDP, even though material considerations could mean that adjustments would be made in the application of such a policy.

I would also like to make two additional comments as regards [REDACTED] letter to Aston Ingham Parish Council dated the 10th February 2022, which I understand may be resubmitted under the Regulation 14 consultation, and one additional observation of my own.

[REDACTED] has suggested that if his site at Aston Bank is deemed not suitable or is not selected under the NDP site allocation process, he would consider converting the farm buildings at Aston Court Farm into the 'required' five houses under "new legislation and prescribed rights" [presumed to be (C3) under Class Q of the General Permitted Development Order 2015 (as amended)]. He has stated that it would not be his preferred option, so has he simply raised this prospect as leverage to get his Aston Bank site adopted? The reality is that if the barns meet the criteria for development under Class Q, he could decide to go down this route at any time independently of any NDP site allocation considerations, and the properties would be catered for under the windfall allowance. Therefore, in my view, this is not a material consideration.

Secondly, there is the issue of public benefits accruing from any proposed development. To date, as far as I am aware, [REDACTED] has simply made a somewhat vague suggestion that some additional parking could possibly be provided for the village hall, but as things stand, the Aston Bank site is clearly not in the same league as the Ellsmere proposals in this regard.

Thirdly, I would point out that the proposed Aston Bank site currently contributes significantly to the flooding of properties in the general area along Cowley Lane.

I also wish to respond to the claim, which has been made on several occasions, that the proposed development on Ellsmere will somehow have a detrimental effect on the activities of the Scouts. The Scouts site is well screened from Ellsmere by a line of trees and other growth, and activities held there are periodic and at times occasional, and generally of relatively short duration. The Scouting Association aims to "provide fun, adventure and skills for life and give young people the opportunity to enjoy new adventures, experience outdoors and take part in a range of creative, community and international activities, interact with others, make new friends, gain confidence and have the opportunity to reach their full potential" [footnote: www.scouts.org.uk/por/1-fundamentals-of-scouting/]. To suggest that the presence of

a small number of well-designed houses sited well-away from the boundary to avoid the flood zones and occupied by young families (whose children might even join the Scouts) and possibly a retired person or couple, together with a community orchard on the other side of a dense line of trees & overgrown hedge and on the other side of a stream, is somehow detrimental to these objectives is, to be frank, absurd. Moreover, the members of the Scout Group and their leaders are to a greater or lesser degree transient and the majority do not even live in the village or even the parish, so I submit that their interest in the proposed Ellsmere development would, or should be, zero. Nevertheless, it is still the intention that Scout Leaders would be consulted on the detail of the proposals.

In general terms I do have concerns that the cumulative costs of implementing the proposed package of policies for the Ellsmere site in full will make it difficult to achieve all of the original objectives of the scheme. However, until the development is designed and costed, there can't be any definitive answers in this regard.

For the avoidance of doubt, the offer of public open space/a community orchard incorporating a village footpath is conditional on planning permission being granted for a suitable scheme on the area of the Ellsmere site allocated for development, and on that scheme being financially viable.

Response

This comment raises two issues relevant to draft NDP policy AST5:

Extent of housing site allocation: it is agreed that the eastern boundary of the housing site allocation be moved eastwards to the extent as suggested in the comment, to take account of flood risk on the western and northern boundaries and enable a design-led scheme to be formulated. Whilst the housing site allocation includes land in Flood Zones 2 and 3, to ensure that proposals for its ecological management are considered as part of the overall scheme, development will only take place in Flood Zone 1 as confirmed in the FRA. See consolidated amendments to policy AST5 and supporting text in Appendix B.

On-road traffic calming and footway improvement scheme between Cowley Lane and Aston Bank: it is agreed that this requirement could not be shown to be reasonably related in scale to the development, and that it should not be a policy requirement to be delivered by the development. However, footway improvement between Cowley Lane and Aston Bank remains an aspiration of the Parish Council, both to address existing conditions and to complement the off-road route for pedestrians and cyclists to be provided through the Ellsmere development. Suitable reference to this aspiration is made in para. 5.9 and in Community Action CA1.

A number of other matters are raised in the comment by way of rebuttal to potential objections to the Ellsmere development or alternative sites. One of these has come forward as a Regulation 14 representation and is addressed in this Response Log (see: 1st Aston Ingham Scout Group). Other matters have not otherwise come forward in the Regulation 14 representations and are not addressed in the Response Log (impact on SSSI, alternative site).

Appendix B: Consolidated amendments to policy AST5, supporting text, Community Action CA1 and Plan 5.

Land at Ellsmere, Aston Ingham is allocated for development for around five new dwellings and public open space. Plan 5 shows the housing site and the public open space. Proposals that are in accord with policy AST3 and meet the following requirements will be supported:

1. the dwellings are of a size and type which contribute to meeting the latest assessment of housing needs in accordance with policy AST6, with a preference for 2- and 3-bedroom properties including bungalows; and
2. vehicular access is taken from the B4222 to the south, retaining as much of the existing hedgerow as is consistent with junction design and visibility requirements; and
3. the design and layout of the new dwellings respects the privacy and seclusion of the Aston Ingham Scout Hut as far as reasonably practicable; and
4. an off-road route for pedestrians and cyclists is provided through the housing and public open space from the B4222 in the east to the west. A Transport Assessment should be provided to demonstrate how the site and village facilities are to be safely accessed by all users; and
5. it is demonstrated through a Flood Risk Assessment that the development will be safe and will not increase flood risk elsewhere, and is otherwise in accord with policy AST11 in respect of surface water management and flood risk. The Flood Risk Assessment should confirm the extent of Flood Zones 1, 2 and 3 within the site and demonstrate that all development is to be located within Flood Zone 1; and
6. an Ecological Appraisal is provided which includes suitable avoidance, mitigation and enhancement measures to address predicted impacts; and
7. the proposal includes public open space as shown on Plan 5 which incorporates a management plan for the conservation, restoration and enhancement of the remaining traditional orchard priority habitat as a community orchard and of land within Flood Zones 2 and 3.

Any proposal for the housing element of the allocated site which does not also include suitable proposals for the public open space element will not be supported.

- 5.8 Ellsmere is a field at Aston Ingham village. It is bounded by the Ell Brook, the B4222 and hedgerow, with village development to the west (including the Scout Hut, accessed by Cowley Lane), south and east. It is a traditional orchard and as such a Habitat of Principal Importance, with orchard trees surviving on its eastern portion.
- 5.9 Policy AST5 has been developed so as to strike a balance between providing proportionate housing growth to meet strategic requirements with the conservation, restoration and enhancement of the priority habitat. It delivers public open space and also seeks to address the issue of poor pedestrian connectivity for those wishing to walk around the village. The key planning requirements are:
- Allocation of land for development for around five dwellings on around 0.5 ha in the western portion of the field. Vehicular access is to be taken from the B4222 to the south. The siting, orientation and design of the new dwellings should take into account and respect the privacy and seclusion of the Aston Ingham Scout Hut which lies west of the Ell Brook.
 - Provision of a Transport Assessment in support of any future planning application for the development to demonstrate that safe and suitable access to the site can be achieved for all users. An off-road east-west route through the allocated site should be provided to enable pedestrians and cyclists to avoid that section of the B4222 around the Oaks Lane junction. It is a Parish Council aspiration to secure improvements to the footway along the B4222 to the west of

the site, between Cowley Lane and Aston Bank, as part of addressing wider highway and road safety concerns (see Community Action CA1). Such footway improvement will both improve on existing conditions for pedestrians and complement the off-road route to be provided by the development of the allocated site.

- A mix of house types and sizes is to be provided in accord with policy AST6, with a focus on meeting the local requirement for 2- and 3- bedroom dwellings and properties to meet the needs of older people.
- Provision of a Flood Risk Assessment in support of any planning application which addresses both fluvial and pluvial (surface water) flood risk. The Flood Risk Assessment should confirm the extent of Flood Zones 1, 2 and 3 within the site. The western extent of the site adjoining the Ell Brook is within Flood Zones 2 and 3. There is also a tributary watercourse to the Ell Brook along the north boundary of the site which is unmodelled. Some modelling of this tributary may be required, and the Assessment should also take account of local knowledge of recent flood events and make appropriate allowance for climate change. All development should be located in Flood Zone 1. The Flood Risk Assessment should confirm that the development will be safe and not increase flood risk elsewhere. The development of the site must also be in accord with policy AST11 in respect of the sustainable management of surface water drainage and flood risk.
- In respect of wastewater, the site drains to the east and is within the Severn Vale catchment. Suitable proposals for the treatment and disposal of wastewater should be provided in accord with Local Plan policy SD4 *Wastewater treatment and river water quality*.
- The creation of public open space as a community orchard on the eastern part of the field, on around 0.5 ha. This part of the allocated site is outside the settlement boundary. It is to be made available as public open space under the terms of a management plan which is to be included within the planning application for the housing development on the western part of the site allocation. The management plan should provide for the long-term conservation, restoration and enhancement of the traditional orchard priority habitat and be informed by an Ecological Appraisal of the overall site provided in support of any planning application. Provision should be made for the ecological management of the land within Flood Zones 2 and 3 on the western and northern boundaries of the site to maintain and enhance biodiversity.
- The housing and public open space/community orchard elements should be formulated and implemented as a comprehensive package and as such are expected to form part of a single planning application.

5.10 Ellsmere has been used historically as an orchard and proposals should consider the possibility of a legacy of contamination from agricultural spraying.

5.11 Dŵr Cymru Welsh Water have indicated that there are water supply issues within the area and that they will advise at the planning application stage as to whether the site can be served by a public water supply without the need to await regulatory investment.

Community Action CA1: amend the second para. to read: “As well as the enforcement of the present speed limits this may include traffic speed indicator devices; footway provision and improvement including between Cowley Lane and Aston Bank, widening, and building out; and village gateways.”.

