



Titley Group Neighbourhood Development Plan 2011-2031

Consultation Statement

November 2022

Regulation 16 Resubmission

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1. INTRODUCTION

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

The NDP has been revised following its failure to achieve sufficient support at Referendum in 6th May 2021 in order to address the matters which led to its rejection by the local community and to strengthen parts of the plan in keeping with the priorities expressed during the consultation stages.

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 stages of Plan preparation, arranged in chronological order:

- The initial stages of work on the Plan, covering the establishment of the Neighbourhood Area and the steering group (section 2).
- Initial community engagement to explore and identify issues (section 3).
- The residents' questionnaire survey (section 4).
- Assessing potential land for housing, including a Call for Sites and consultation on site and settlement boundary options (section 5).
- The draft Plan consultation under Regulation 14 (section 6).
- The issues and concerns raised in response to the Regulation 14 consultation, and how they were addressed (section 7).
- Representations made to a public meeting held on 8th May 2022 (Section 8)
- The Regulation 14 consultation on the resubmission draft. (Section 9)

1.3 Each section of the Statement provides an overview of the activity undertaken at that stage. Documents referred to are where possible referenced by web address or otherwise included in Appendices.

1.4 The following consultation approaches were used:

- Posting of material online via an NDP tab on the Titley Group Parish Council website at <https://titleygroup-pc.gov.uk/>.

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

- Regular steering group meetings open to the public at either Titley or Staunton-on-Arrow village halls. Notes of meetings are available on the website.
- Posting of material on the parish noticeboards at Titley and Staunton-on-Arrow.
- Daytime and evening drop-in events held at key stages in the process at Titley and Staunton-on-Arrow village halls. These events were publicised by flyers and by use of the parish magazines, Parish Council website, email, and the parish noticeboards.
- Residents' questionnaire survey.
- Call for Sites to identify potential land for housing.
- Distribution of printed copies of the draft NDP to households and businesses in the Neighbourhood Area as part of the Regulation 14 consultation, together with consultation by email or post to consultation bodies and other consultees. Responses could be made using a comments form included with the draft NDP or downloadable from the website.
- Further steering group meetings to agree amendments to the NDP following rejection at referendum
- Public meetings
- Notification to relevant local businesses and local bodies that a new draft NDP had been prepared and publication of the draft on the parish council website inviting responses. Hard copies of the draft NDP were also made available for viewing at Titley Village Hall, on the Parish Council website or on request from the Parish Clerk.

2. ESTABLISHING THE NEIGHBOURHOOD AREA AND STEERING GROUP

2.1 The following steps and actions were undertaken in terms of initiating work on the NDP:

- Initial consideration by Titley Group Parish Council as to whether to undertake an NDP. The decision to do so was made at the Annual Meeting of the Parish Council on 10 May 2016. Minutes of this and other Parish Council meetings referred to are available at <https://titleygroup-pc.gov.uk/parish-council-minutes/>.
- Consultation by Herefordshire Council on the proposed Titley Group Neighbourhood Area, 15 June 2016 to 13 July 2016. No comments were received, and the application for the designation of the Neighbourhood Area was approved on 14 July 2016. The Neighbourhood Area boundary is the same as that of the Group Parish Council area.
- Establishment of a Steering Group at the Parish Council meeting on 8 November 2016. This included parish councillor representation from both Titley and Staunton-on-Arrow, the two settlements identified in the Herefordshire Local Plan Core Strategy to receive housing growth. The first Steering Group meeting took place on 15 November 2016.

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

- Whether to proceed in principle with an NDP at group parish-level.
- The extent to which the communities could control the type of development they wanted to see in the Neighbourhood Area.
- Queries in respect of the process to be followed.

2.3 These issues and concerns centre on delivering greater local control over development by making use of the new powers available under the Localism Act 2011. They were considered and addressed by:

- The Parish Council decision in May 2016 to undertake an NDP.
- Successful application for Neighbourhood Area designation.
- The Parish Council's decision in November 2016 to establish a Steering Group including parish councillors and with representatives from both Titley and Staunton-on-Arrow.
- Seeking expert guidance, leading to the early appointment of a planning consultant in January 2017.

2.4 Decision by the Parish Council to prepare a revised NDP to address the reasons for its failure at referendum.

- The Parish Council decision in 20th July 2022 to revise and resubmit the NDP.

3. EXPLORING THE ISSUES

3.1 Following a discussion about community consultation at the Steering Group, two drop-in events were arranged. These provided an opportunity to explain to the wider community how it was intended to go about the preparation of the NDP, and to identify and explore local issues.

3.2 The drop-in events were publicised by a flyer to all households. Information was also included in the parish magazines for Titley and Staunton-on-Arrow, on the Parish Council website and the parish notice boards. The events were held:

- at Staunton-on-Arrow village hall on 13 May 2017; and
- at Titley village hall on 20 May 2017.

3.3 The events were staffed by members of the Steering Group and the planning consultant. A total of 56 residents attended the two sessions. The HC ward councillor also attended. The events provided a forum to explain the thinking behind undertaking the NDP, to raise awareness and to collect initial comments on issues of concern. A map was displayed showing the extent of the Neighbourhood Area together with display boards dealing with process, housing, employment, roads/traffic, community services and environment. Comments were invited by means of post-it notes on each board.

3.4 To summarise the main issues raised in comments:

- A desire to see homes at more affordable prices for younger people.
- Preference for smaller houses for both young and old.
- Housing should be dispersed not provided as larger estates.
- Many other comments on housing types, size, and design.
- Capacity of local infrastructure to accommodate new development.
- Improved broadband (reliability).
- Comments on potholes, speed limits, hedges/verges, footpaths and cycle paths.
- Reference to various aspects of community services including bus services, community shop and making more use of the village halls.
- Impact of biodigester at Staunton-on-Arrow.
- Requests for protection of the “traditional aesthetic” in the area and for the preservation of local habitats and woodland.

3.5 The drop-in events provided information on the local issues and concerns to be addressed in the NDP. These were considered and addressed by:

- Ensuring that the matters raised informed the overall scope of the residents’ questionnaire survey, with questions seeking further information on specific points, such as the form and types of new housing and its location, community facilities and protecting the environment.

3.6 The flyer distributed to households and a summary of feedback from the events can be seen at Appendix 1.

4. RESIDENTS' SURVEY

4.1 The next stage of the plan-making process was the residents' survey. Professional help was used to draw up a questionnaire. The questionnaire took into account the issues arising and information gathered at that point, including through the drop-in events, together with discussion in the Steering Group.

4.2 The questionnaire focussed on topics which the Steering Group identified as important: a vision for Titley Group; housing; traffic, transport and access; jobs and the local economy; protecting our environment; and community services. The questionnaire sought views on locations suitable for new homes at Titley and Staunton-on-Arrow. Comments were also requested on locations suitable for new employment development, and on landscape features, views and habitat areas which were thought to be deserving of protection.

4.3 A total of 350 copies of the questionnaire pack were hand-delivered to households across the Neighbourhood Area in July 2017 by members of the Steering Group. The questionnaire pack included a covering letter and a set of 'frequently asked questions' to explain the background to the survey and to the Neighbourhood Plan process more generally, as well as completion and return instructions and a map of the Neighbourhood Area. All residents aged 16 and over were invited to participate in the survey.

4.4 Completed questionnaires were collected by hand or could be returned by residents to their appointed volunteer. Return visits were made as necessary. Overall, 221 completed questionnaires were collected, a response rate of 61.4%.

4.5 Analysis of the questionnaires was undertaken with professional support. As a first stage in the dissemination and discussion of the results, a presentation was made by the planning consultant to the Steering Group on 26 October 2017, followed by discussion.

4.6 Following the meeting, the survey analysis was published in the form of two reports posted to the Parish Council website at <https://titleygroup-pc.gov.uk/ndp-residents-questionnaire-survey/>. They are:

- Results Report: a full report analysing the questionnaire responses. A summary of the principal findings of the survey can be seen at Appendix 2.
- Comment listings: report listing all the comments made in response to questions inviting free-write comment on all aspects of development and the environment.

4.7 A newsletter was produced in October 2017 to share the summary of the results with the community and explain the next steps. This can be seen at <https://titleygroup-pc.gov.uk/ndp-newsletter-october-2017/>.

4.8 The survey provided a wealth of information for consideration in the preparation of the NDP. The issues and concerns raised may be summarised as follows:

A Vision for Titley Group

- Most responses were in agreement with the draft vision.
- Comments on community stressed the need for affordable housing to meet local needs, linked to jobs and infrastructure such as broadband.
- For the economy, a balance was needed between large-scale agri-business and the environment.
- Protection and enhancement of the environment was sought, with sustainability considered as an over-arching requirement.

Housing

- The preference was for new housing to be provided as single dwellings, followed by smaller schemes each of several dwellings. A larger development of more than 10 houses was not favoured.
- Most respondents wanted to see new housing provided as 2- or 3-bedroom homes, rather than as larger houses.
- Live/work and self-build new homes were supported, as were dwellings with high environmental standards.
- Comments suggested various locations as suitable for new housing, as well as places where housing should not be built, notably Stagg Meadow at Titley. Generally, the preference was for development to be directed to the existing villages of Titley and Staunton-on-Arrow.
- A rural exception housing scheme was supported as a way of providing affordable housing.
- In other comments, there was a recognition that more affordable housing was needed to help meet the needs of those young people and families who wished to stay in the area.

Traffic, transport and access

- Top priority for improvement was road, hedge, ditch and drain maintenance.
- Road safety for all users was also an area for improvement, with support for schemes to “calm” traffic and reduce speed.
- Comments emphasised issues around road maintenance, with many references to potholes. There were concerns also over traffic speeds and the use made of the rural roads by heavy goods vehicles, tractors and farm equipment.

Jobs and the local economy

- Favoured types of employment were agriculture and forestry, closely followed by tourism, leisure and crafts, reflecting the nature of the area. Intensive livestock units and polytunnels were not favoured.
- In providing for jobs, replies supported broadband improvements, home working, live/work premises, extending existing businesses and converting rural buildings.
- There was support for further provision for walkers and to a lesser extent for farm diversification, cyclists and horse riders.
- Comments on employment generally supported small-scale, traditional enterprises, with larger-scale businesses such as intensive livestock units not favoured. Others referred to the role of agriculture in providing jobs.
- Other comments sought to promote the local economy, to provide jobs for young people and to support small businesses.

Protecting our environment

- Almost all wanted to see traffic from new development to be compatible with local roads, to be in keeping with its surroundings and to avoid noise and light pollution.
- The most important ways to protect the local environment were to protect the character of the landscape, followed by protecting local green spaces.
- Many landscape and wildlife features and attributes were identified for protection, notably Wapley Hill, Flintsham and Titley Pools, Eywood Park, Stagg Meadow and Mowley Hill.
- Solar panels, provision in new buildings and ground/air source heat pumps were favoured as acceptable ways of generating renewable energy over wind and solar farms, biomass and anaerobic digesters. There was a lack of support for larger-scale forms of energy generation.

Community Services

- The most important community service in meeting the current and future needs of the community was viewed as broadband; the parish churches were least important.
- Comments on the need for additional leisure and recreational facilities referred to making best and wider use of the village halls, and to other forms of community provision, including the non-worship use of the churches. A requirement for play facilities in various forms was also highlighted.

4.9 These issues and concerns were considered at subsequent stages of the process. Land use and development issues were addressed through the formulation of planning policies in the draft NDP. In addition, the Steering Group decided to commission a Housing Site Assessment to investigate site requirements further and provide a basis for the preparation of relevant policies on housing. Non-land use issues such as road maintenance were addressed as Community Actions in the draft NDP.

5. ASSESSING POTENTIAL LAND FOR HOUSING

5.1 This stage of the plan process dealt with the identification of potential land for housing and sought to reach conclusions as to site allocations and settlement boundary implications. A Call for Sites was held to give full opportunity for land to come forward on an open and transparent basis and ensure that land under consideration would be available for development. A Housing Site Assessment (HSA) was prepared to review the submitted sites and recommend sites for allocation and associated draft settlement boundaries. Consultation was held with the community on the emerging proposals.

Call for Sites

5.2 The Call for Sites was held in November and December 2017. The Steering Group appointed a volunteer Call for Sites Co-ordinator to manage the process and act as a point of contact. The Call for Sites exercise comprised:

- Giving advance notice of the Call for Sites in the October 2017 NDP Newsletter which was circulated throughout the Neighbourhood Area.
- Identifying relevant landowners through the local knowledge of Steering Group members, and advising them by letter/email of the Call for Sites.
- Advertising the Call for Sites on the home page of the Parish Council website. A form was prepared to assist in site submissions which could be downloaded from the website.
- The preparation of a poster which was displayed on Parish noticeboards and placed on the website.

5.3 A total of 14 sites were submitted to the NDP Call for Sites Co-ordinator. These were passed to the planning consultant for assessment.

Housing Site Assessment

5.4 The HSA recommended five sites for allocation for housing (two at Titley and three at Staunton-on-Arrow) with a total capacity of 20 dwellings, together with associated open space. The HSA also recommended draft settlement boundaries for these two settlements. The HSA can be seen at <https://titleygroup-pc.gov.uk/ndp-housing-site-assessment/> (includes the site submission form and the poster).

5.5 To seek community views on these proposals, three open sessions were held in May and June 2018. The first two sessions were held on 5 May at Titley (a.m.) and Staunton-on-Arrow (p.m). Following public comments at the Annual Parish Meeting on 8 May, the Steering Group decided to hold a third session at Staunton-on-Arrow in response to public interest. The sessions were publicised by means of flyers which were distributed to households and posted to the Parish Council website. Display boards were prepared and the sessions were variously staffed by members of the Steering Group and the planning consultant. The events were attended by residents as follows: Titley 42; Staunton-on-Arrow 23 (May) and 41 (June). The HC ward councillor also attended.

5.6 Reports have been prepared for the May and June sessions which give full details of the open sessions including the flyers, display boards, comment form and the results. They can be seen via the NDP tab at <https://titleygroup-pc.gov.uk/>.

Issues and concerns

5.7 This phase of work directly addressed community concerns about how to accommodate new housing to meet local requirements which were raised in earlier phases of consultation. The issues and concerns may be summarised as follows:

- A Steering Group concern was to ensure that there was full opportunity for potential sites to come forward, having regard to the responses on this issue in the residents' survey including to help meet the needs of young people and families.
- On consultation, there was general agreement with the proposed housing sites and settlement boundary for Titley.
- At Staunton-on-Arrow, there were concerns about the number of houses proposed particularly on Site 10 which was proposed to accommodate 10 new dwellings. There were also other concerns about the site, including about the proposals for green space.

Considering and addressing issues and concerns

5.8 These issues and concerns were considered and addressed at meetings of the Steering Group by:

- Ensuring that the HSA set out a comprehensive explanation of the work undertaken and a reasoned basis for recommendations, including by reference to established strategic and national planning policy.
- Providing opportunities for the community to review and comment on the proposed sites and settlement boundaries, with professional advice available to answer queries.
- Taking account of the views thus expressed. The consultation feedback was discussed at a Steering Group meeting on 28 June 2018. In respect of site 10, it was decided to reduce the number of proposed houses from 10 to five and to define the green space as a percentage of the overall area to give greater certainty as to the quantum required. Having regard to feedback it was agreed that no changes were needed to the other proposed sites or to the settlement boundaries.
- Ensuring that issues and concerns arising were professionally considered in drawing up the draft NDP, and that all documentation including notes of meetings were posted in a timely manner to the website.

6. CONSULTATION ON THE DRAFT PLAN

The consultation process

6.1 Consultation on the draft NDP was carried out in accordance with the requirements of Regulation 14 of the Neighbourhood Planning (General) Regulations 2012. The consultation ran for eight weeks from 3 December 2018 to 28 January 2019.

6.2 The Environmental Report and Habitats Regulations Assessment, which had been carried out in November 2018, were also published for consultation.

6.3 Copies of the draft NDP were distributed to households and businesses throughout the Neighbourhood Area at the outset of the consultation period, accompanied by a covering letter from the Chairman of the Parish Council, a pre-submission consultation and publicity notice, and a comments form. All documents were posted on the Parish Council website and can be seen at <https://titleygroup-pc.gov.uk/draft-ndp-plan-october-2018/>. Comments could be made by hand, post or email, or at drop-in sessions arranged for Titley (8 December) and Staunton-on-Arrow (14 December).

6.4 A list of consultees was compiled by the Steering Group, starting with the statutory consultees identified in guidance produced by HC.² Other consultees were then added to the list, having regard to the consultation bodies specified in paragraph 1 of Schedule 1 of the 2012 Regulations. The final list embraces national and regional bodies, the local planning authority, neighbouring parish councils, and other local consultees including including respondents to the Call for Sites (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.

6.5 A copy of the draft Plan was placed on public deposit for inspection at the Kington Customer Service Centre and posters were placed in the parish notice boards.

6.6 The two drop-in events in December 2018 were designed to give an opportunity for local residents and businesses to seek further details on any aspect of the NDP, and to make comments. The events were referred to in the Chairman's covering letter circulated with copies of the draft NDP and further publicised via the consultation and publicity notice, Parish Council website, email and posters on the parish notice boards. Display boards were prepared (Appendix 3) and copies of the draft NDP and comment forms were available. The sessions were staffed by members of the Steering Group and the planning consultant. The events were attended by residents as follows: Titley 11; Staunton-on-Arrow 9. The HC ward councillor also attended.

² https://www.herefordshire.gov.uk/downloads/file/3704/guidance_note_13_statutory_consultees

Table 1: draft NDP consultees**National organisations**

Environment Agency	Forestry Commission England
Natural Resources Wales	Highways England
Natural England	Wye Valley NHS Trust
Historic England	National Grid
Coal Authority	RWE Npower Renewables Ltd.
Homes and Communities Agency	Western Power Distribution
English Heritage	Dwr Cymru Welsh Water
National Trust	

Local organisations

Herefordshire Council (HC)	Woodland Trust
CLlr R. Phillips, HC	Herefordshire Wildlife Trust
CPRE Herefordshire	National Farmers Union Herefordshire
H & W Chamber of Commerce	Parochial Church Council

Adjoining parish councils

Powys CC	Lyonshall Parish Council
Old Radnor Community Council	Pembridge Parish Council
Presteigne and Norton Town Council	Stapleton Group Parish Council (Byton CP, Combe PC)
Kington Rural and Lower Harpton Group Parish Council (Kington Rural CP and Lower Harpton CP)	

Call for Sites respondents and local businesses

Mr. David Forbes	Mr. Abson
Mr. Leslie Preece	Mr. Jeremy Mitchell
Mrs. Angela Vaughan c/o agent Mike Harries, John Amos & Co	Mrs. Phyllis Lewis
Mr. Will Burton c/o agent Bill Stokes, William Stokes Consulting	Mr. Christopher Jones
Mr. Stephen May	The Stag Inn
Mr. Andrew Burton c/o agent Bill Stokes, William Stokes Consulting	

7. RESPONSES TO THE CONSULTATION

Issues and concerns raised

7.1 Consultation body responses were received from Herefordshire Council and six other organisations. Comments were received from 47 residents (or their agent). All the comments are shown in the Response Log at Appendix 4, together with a response to each comment and the amendments made to the draft NDP where these arise.

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

- That the draft NDP policies were with one exception considered by HC to be in general conformity with equivalent strategic policies.
- Historic England raised concerns over the potential impacts of one of the proposed site allocations at Titley (draft policy TG5) on designated heritage assets.
- The need and justification for any additional housing.
- Concerns over capacity of infrastructure to accommodate and serve new development, particularly at Staunton-on-Arrow.
- Suggestions for amendments to the Titley settlement boundary, including re land at Old Priory, Balance Farm, Half Barrel Cottage and at Eywood Lane.
- Comments on the NDP proposal at Titley Farm (policy TG4) re number of houses, tenure, need for play area, and access.
- Land west of the Stag Inn should be allocated for housing in the draft NDP.
- The area for housing within site 10 (referred to in the draft NDP as land opposite Old Court Cottage/Newton and proposed in policy TG7) at Staunton-on-Arrow was too small and should be increased. A number of other matters were raised in respect of this site including type and size of housing, roadside hedge, treatment/maintenance of the proposed open space, footway, car parking and traffic generation.

Considering and addressing issues and concerns

7.3 All comments were passed to the planning consultant for review and to provide a recommended response, including amendments to the draft NDP. Key issues and concerns were discussed at a Steering Group meeting on 14 February 2019. The recommended detailed responses and NDP amendments were then considered at a meeting of the Steering Group on 14 March 2019. Table 2 provides a summary of the principal amendments to the draft NDP in plan order. Full details may be found in the Response Log at Appendix 4.

7.4 Consultation comments, the recommended responses and amendments to the draft Plan were further considered at a meeting of the Parish Council in May 2019.

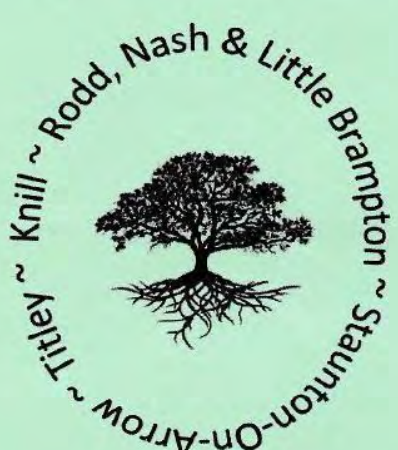
Table 2: Schedule summarising principal changes made to the draft NDP following consultation

Ref	Consultee	Change to be made
	Public comment	Para. 2.8: provide further breakdown of age groups.
	Public comment	Vision: include further reference to aspects of local employment.
	Historic England	Delete policy TG5.
	Public comment	Policies TG6 and TG9: clarify re proposals for non-housing uses.
	Public comment	Policy TG6: amend settlement boundary in vicinity of Half Barrel Cottage.
	Public comments	Modifications to policy TG7 and supporting text re development area, open space and other planning requirements.
	Herefordshire Council (Planning policy)	Para. 8.4: include reference by type to important views and local features.

APPENDIX 1

Drop-in events May 2017: flyer and summary of feedback

*Titley Group Parish
Neighbourhood Development Plan*



With recent changes in planning regulations relating to our parishes, Titley Group Parish Council has set up a steering group to develop a Neighbourhood Plan. This will be used to shape future housing, environmental, employment and highway requirements within our villages. As part of our consultation with the wider community we will be holding two open mornings:

Sat. 13th May, Staunton-on-Arrow Village Hall: 10 till 1

Sat. 20th May, Titley Village Hall: 2:30 till 5:30

Please drop in for informal discussions and have a say in the future development of your village.

Refreshments provided.

SUMMARY OF FEEDBACK FROM THE TWO NDP “DROP IN” SESSIONS

A Total of 56 adult residents attended the two sessions (36 at Staunton on morning of 13th May, 2017 and 20 at Titley on the afternoon of 20th May, 2017). Comments are listed in order of relative number of comments.

DGM

22nd May 2017

Process

- Define Neighbourhood Settlement Area
- Prepare Plan
 - Set up Steering Group
 - Consult Community (meetings, questionnaires, etc.)
 - Develop Draft Plan
- Pre-submission Consultation & Publicity of Draft Plan (Reg 14)
 - 6 weeks
- Submission of Final Plan (Reg 15/16 ‘gains legal weight’)
- Independent Examination (Reg 17)
- Referendum
- Adoption (Reg 19)

COMMENTS FROM DROP IN SESSIONS

Communication about progress of plan needs to be improved-newsletter? posts on Titley Parish Council site?

Housing

- 20 – 25 new houses in Titley & Staunton by 2031
 - Location
 - Size & Type
 - Affordability
 - Local Need /Market Housing
 - Village Appearance
 - Other options, e.g. self-build, housing association, conversions, etc.

COMMENTS FROM DROP IN SESSIONS

*Most mentioned: Housing to meet **local needs-low cost**, possibly reserve some housing for local people; an emphasis on housing for **young families**. Involve Housing Associations and look at “Share Ownership” and “Help to Buy” schemes.*

Note also need for small housing units for older people who want to down-size, but stay in their community.

Mixed housing, not “exclusive estates”. Priority for 2/3 bed houses not 4/5.

Dispersed housing-villages already have dispersed pattern of housing, large concentrations are out of character with area. Important to consider location-reduce impact on locality.

Style of housing should be sympathetic to existing local style-avoid “red-brick estates”, but need not necessarily be period style/type.

Energy efficient “eco-houses” built to a quality standard; important to reduce running costs, make more affordable.

Must take account of fact that local infrastructure (roads, sewerage systems etc) not well developed; Local services are poor and there is little local employment; these are factors which act to restrict further housing development

Could support for “live/work” sites (as in Powys) be sought.

Identification of “self-build” sites or old buildings for sympathetic conversion, liaise with local landowners to identify such sites.

How far along to housing target (20 to 25) are we? 25 should be absolute limit in Titley.

Herefordshire Council farms should not be sold, associated houses could be used for homes to rent for young families.

Investigate “Community Land Trusts”.

Get local companies, (e.g. Border Oak) involved in design/build low cost housing.

Consider using “planning gains from housing development for environmental improvements

Employment

- Agriculture – Farming-related
- Small Businesses – Offices / Home-working / Cottage Industries
- Light Industry – Manufacturing
- Forestry
 - Tourism
 - Leisure & Crafts
- Local Businesses
 - Extension of existing businesses
 - Development of live/work premises
 - Conversion of rural buildings for business
 - Self-employed

COMMENTS FROM DROP IN SESSIONS

*Single biggest issue noted: RELIABLE (not necessarily superfast) **broadband** restricting businesses in area, particularly to locations outside village “centres”.*

Encouraging employment important if proposed housing to be used.

Is there scope for a local “Social Enterprise” scheme to get “Live/work premise in the villages?

Can we set up a local rural business meeting centre? (possible role for Village halls?)

Need to ensure businesses can remain in area, if they grow.

Roads/Traffic

- Road Safety
 - Speed Limits
 - Signage
- Road Maintenance
 - Hedges
 - Ditches
 - Pot-holes
- Footpaths
 - Maintenance
 - Signage

COMMENTS FROM DROP INS

Potholes major concern-delays in filling, poor filling, difficult system to report them, damage done by heavy vehicles including tractor/trailer combos, often travelling long distances, which are not seen as paying “fair share” re road tax and fuel duty. Pointed out that “patching up” less cos effective than doing proper resurfacing.

Speed limits needed in Staunton Village, Staunton Green, Stansbatch and limit through Titley should be lowered to 30mph (or even 20mph) and extended out as far as Stansbatch turn and Shawl corner. Suggested that the whole of B4355 should be max 50mph to protect cyclists, walkers, riders etc. traffic calming measures on entry to villages such as priorit flow, flashing limit signs; Some tractor drivers seen as major offenders re breaking limits.

The following were mentioned by small numbers of residents

Hedges/Verges-valuable for wild life but some cutting back needed for safety

Coordination at local level for lifts to school, shopping etc

Footpaths-not being maintained/cleared. Obstructed by electric fences. Approach landowners with a view to developing footpaths alongside roads, keeping pedestrians away from traffic

Need for a safe footpath from Forge lane into centre of Titley

Need for **cycle paths**, possible use of old railway line land? Encouragement for cycling. Need to push for County wide strategy e.g to make access to Hereford easier by bike, perhaps by having park and bike set up.

One dissenting voice-speed limits mean increase in unnecessary signage!

Community Services

- Village Halls and their contribution?
- Bus Service through Titley – adequate?
- Parish Churches and their contribution
- What else for vibrant community?
 - Primary school
 - Play group
 - Social groups

- Youth groups
- Play areas
- Lunch clubs
- Village shop

COMMENTS FROM DROP INS

***Bus services** an issue; in Staunton-non-existent! Infrequent in Titley and should be improved. Could here be a local “Community Wheels” type service? A particular issue for elderly people, means some keep driving when not really desirable.*

*Some support for concept of a **Community Shop** in both villages, possible use of **Village halls or Churches?** Possibly one day a week, using local produce?*

*Given imminent closure of local Sixth Form and travel difficulties for many young people, could **Village Halls** have a role in providing 16-18 Education via IT?*

*Lack of services, together with expensive housing, an issue for young families, so do not move into area, so no great call for “**child centred**” services although some support for a “play area” linked to **Titley Village hall**.*

*Some support (from Titley) re idea of “**lunch club**” in **Village Hall**, as a social facility, not necessarily limited to the “elderly”*

OAP Club?

Improved links with Pembridge school

*Is there a possibility of part of parish **Churches** being converted to accommodation units?*

Concern about health services, including GPs

Environment

- Building materials & local sourcing
- Energy & resource efficiency (e.g. renewable energy, grey water recycling, etc.)
- Noise / light pollution
- Protection of: views, landscape character, natural features (e.g. woodland), wildlife habitats
- Flooding issues

COMMENTS FROM DROP INS

*Biodigester in Staunton seen as causing noise and light **pollution**, need more rigorous protection for local environment in future. No street lighting in future developments to reduce light pollution*

*Support for **tree and hedge-planting and maintaining/extending woodlands**. Improvement of habitat for animals. Identification of trees which have particular character and should be preserved-we can draw on local expertise. Not necessarily a block on development but helps to ensure issue looked at by planners*

*Concern re number of chicken sheds in area and consequent **pollution** as well as impact on road infrastructure. "Industrialisation of farming" seen as possible problem.*

*Preserve "**traditional aesthetic**" of area, dispersed housing, traditional materials-with rigorous protection of SSIs, historic parks and gardens, especially Eywood Estate locale, and important habitats-must be considered re any developments. Certain local habitats are damaged already e.g. Stansbatch brook-need to restore to healthy condition. Stagg Meadow seen as important asset in Titley and should not become a housing site. Possible improvement of Stansbatch Pond (funding from planning gain?)*

Use of local materials important both for aesthetics and reducing pollution

*Encourage **solar energy** schemes (although some suggestion they cause light pollution"?)*

*Encourage "**rainwater saving**" schemes*

APPENDIX 2

Residents' survey July 2017: Summary of results

Summary of results

The survey was undertaken in July 2017 and achieved a response rate of 61.4%.

A Vision for Titley Group

- Most responses were in agreement with the draft vision.
- Comments on community stressed the need for affordable housing to meet local needs, linked to jobs and infrastructure such as broadband.
- For the economy, a balance was needed between large-scale agri-business and the environment.
- Protection and enhancement of the environment was sought, with sustainability considered as an over-arching requirement.

Housing

- The preference was for new housing to be provided as single dwellings, followed by smaller schemes each of several dwellings. A larger development of more than 10 houses was not favoured.
- Most respondents wanted to see new housing provided as 2 or 3 bedroom homes, rather than as larger houses.
- Live/work and self-build new homes were supported, as were dwellings with high environmental standards.
- Comments suggested various locations as suitable for new housing, as well as places where housing should not be built, notably Stagg Meadow at Titley. Generally, the preference was for development to be directed to the existing villages of Titley and Staunton-on-Arrow.
- A rural exception housing scheme was supported as a way of providing affordable housing.
- In other comments, there was a recognition that more affordable housing was needed to help meet the needs of those young people and families who wished to stay in the area.

Traffic, transport and access

- Top priority for improvement was road, hedge, ditch and drain maintenance.
- Road safety for all users was also an area for improvement, with support for schemes to “calm” traffic and reduce speed.
- Comments emphasised issues around road maintenance, with many references to potholes. There were concerns also over traffic speeds and the use made of the rural roads by heavy goods vehicles, tractors and farm equipment.

Jobs and the local economy

- Favoured types of employment were agriculture and forestry, closely followed by tourism, leisure and crafts, reflecting the nature of the area. Intensive livestock units and polytunnels were not favoured.
- In providing for jobs, replies supported broadband improvements, home working, live/work premises, extending existing businesses and converting rural buildings.
- There was support for further provision for walkers and to a lesser extent for farm diversification, cyclists and horse riders.
- Comments on employment generally supported small-scale, traditional enterprises such as woodworking, with larger-scale businesses such as intensive livestock units not favoured. Others referred to the role of agriculture in providing jobs.
- Other comments sought to promote the local economy, to provide jobs for young people and to support small businesses.

Protecting our environment

- Almost all wanted to see traffic from new development to be compatible with local roads, to be in keeping with its surroundings and to avoid noise and light pollution.
- The most important ways to protect the local environment were to protect the character of the landscape, followed by protecting local green spaces.
- Many landscape and wildlife features and attributes were identified for protection, notably Wapley Hill, Flintsham and Titley Pools, Eywood Park, Stagg Meadow and Mowley Hill.
- Solar panels, provision in new buildings and ground/air source heat pumps were favoured as acceptable ways of generating renewable energy over wind and solar farms, biomass and anaerobic digesters.
- Comments generally re-iterated the opposition to larger-scale forms of energy generation.

Community Services

- Broadband was seen as the most important community service, followed by mobile phone reception and the village halls; the parish churches were the least important.
- Comments on the need for additional leisure and recreational facilities referred to making best and wider use of the village halls, and to other forms of community provision, including the non-worship use of the churches. A requirement for play facilities in various forms was also highlighted.
- Others saw no need for additional facilities, reflecting the likely limited viability and the nearby existing provision in Kington and Presteigne.

Information about you

- Compared to 2011 Census data for the Neighbourhood Area, females were slightly over-represented in responses.
- Younger age groups up to and including the 25-44's were under-represented in responses against the 2011 Census.
- Most respondents had lived in the Area for 10 years or longer.



Titley Group Neighbourhood Development Plan 2011-2031

The story so far

- **Parish Council decides to prepare NDP**
- **Approval of Neighbourhood Area July 2016**
- **Steering Group formed**
- **Drop in sessions May 2017**
- **Residents questionnaire July 2017**
- **Call for housing sites November 2017**
- **Drop in sessions May & June 2018**
- **Preparation of draft NDP**

Public consultation on the draft Plan

3 December 2018 to 28 January 2019



Titley Group Neighbourhood Development Plan 2011-2031

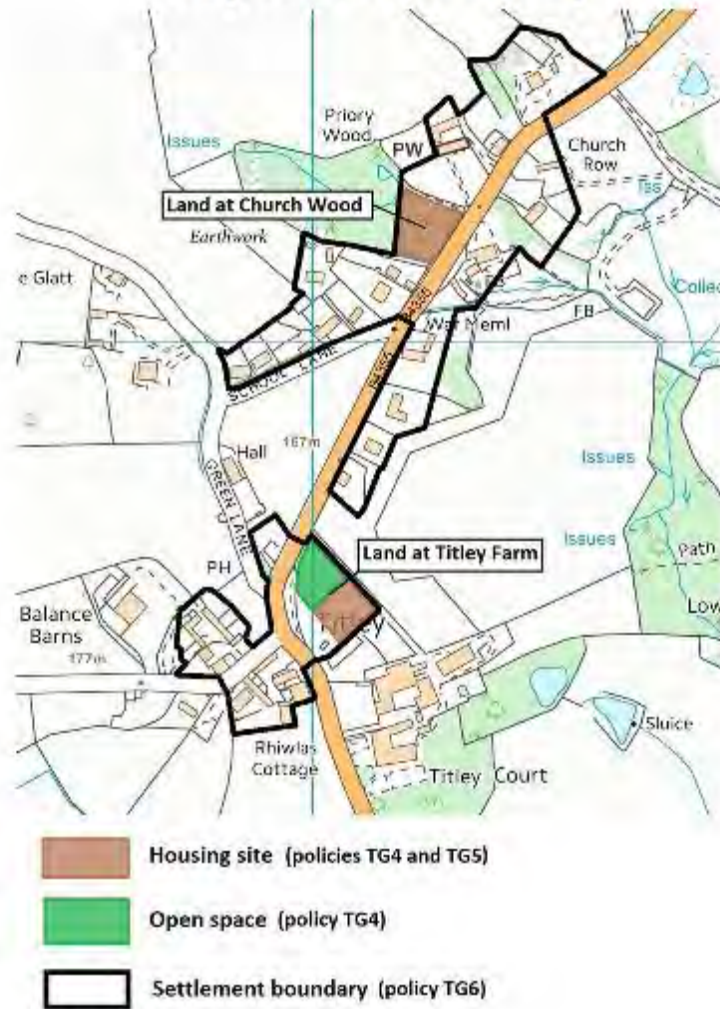
Housing

- Requirement is for at least 23 new houses between 2011 and 2031
- Some have been built, others have planning permission (16 houses)
- Windfall allowance = 16 houses
- NDP includes proposals for:
 - Titley: around 8 new houses (2 sites)
 - Staunton-on-Arrow: around 7 new houses (3 sites)
 - Type & size to meet local needs
 - Open space
 - Settlement boundaries
- Total housing = 52



Titley Group Neighbourhood Development Plan 2011-2031

Proposals for Titley

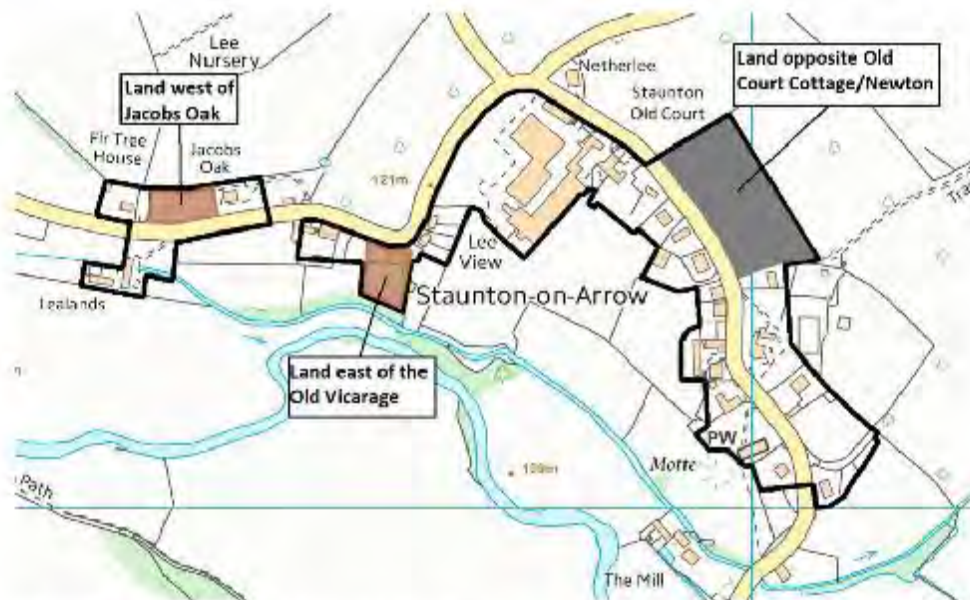





3



Titley Group Neighbourhood Development Plan 2011-2031

Proposals for Staunton-on-Arrow



-  Open space and housing (policy TG7)
-  Housing site (policy TG8)
-  Settlement boundary (policy TG9)

4



Titleley Group Neighbourhood Development Plan 2011-2031

Economic & Social

- **Economic development in Titleley Group**
 - Supported subject to scale & traffic
 - Re-use of redundant buildings
 - Live/work
 - Extensions
 - Farm diversification
 - Tourism and leisure
- **Communications and broadband**
- **Renewable energy**
- **Community facilities**
 - New provision in villages supported
 - Existing facilities protected



Titley Group Neighbourhood Development Plan 2011-2031

Environment

- **Natural environment**
 - Nationally-designated sites
 - Local Wildlife Sites
 - Landscape character
- **Historic environment**
 - Heritage assets – listed buildings, scheduled monuments, Eywood park and garden
 - Historic farmsteads
- **Design and access**
 - Character
 - Sustainability
 - Amenity & access
 - Landscaping and green infrastructure



Titley Group Neighbourhood Development Plan 2011-2031

Next steps

- **Consultation ends 5 p.m. 28 January 2019**
- **Steering Group** considers comments and any changes needed to the draft NDP
- **Parish Council** approves revised NDP
- **Submission of NDP to Herefordshire Council**
 - Plan gains weight in determination of planning applications
- **Further consultation** – six weeks
- **Independent Examination**
- **Referendum**
- **Adoption**

APPENDIX 4

Regulation 14 consultation Response Log showing comments received, response to comments, and amendments to the draft NDP.

Table A4.1 Comments from consultation bodies

Table A4.2 Community and other comments: Staunton-on-Arrow

Table A4.3 Community and other comments: Titley

NB all page and policy references are to the draft NDP dated October 2018.

Table A4.1: Comments from consultation bodies

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Titley Group draft NDP
Herefordshire Council (HC) (Neighbourhood Planning)	NDP	C	<p>Overall the plan is a well written and well researched plan. It is clear to see that the policies have taken into account the views of the local community and have carried out various consultations. It is clear that the plan takes a positive approach towards identifying settlement boundaries and growth in line with the Core Strategy.</p> <p>[NB the HC response advises that no comments were received from the following Herefordshire Council service providers: Development Management, Landscape/ Archaeology/Conservation, Economic Development, Environmental Health, Parks and Countryside, Education, Waste.]</p>	This recognition of the work undertaken to establish an evidence base and in carrying out consultations during the preparation of the NDP is welcomed, as is the acknowledgement that a positive approach has been taken towards settlement boundaries and housing delivery.	No change.
			Neighbourhood Development Plan (NDP) – Core Strategy Conformity Assessment		

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received				Response	Amendments to Titley Group draft NDP
			Draft Neighbourhood plan policy	Equivalent CS policy(ies) (if appropriate)	In general conformity (Y/N)	Comments		
Herefordshire Council (HC) (Strategic Planning)							Response to comment on policy TG6: HC Neighbourhood Planning Guidance Note 20 on settlement boundaries refers to considering “commenced planning permissions, recent refusals, planning appeal decisions” in respect of areas on the edge of villages. This planning permission for 5 dwellings has not been commenced. An adjacent application (LPA ref 162824) for the same number of dwellings was refused on appeal because it was found to cause significant harm to highway safety. The LPA has	No change.
			TG1- Sustainable Development	SS1	Y			
			TG2- Housing Needs and Requirements	SS2; RA2; RA3; RA4; RA5	Y			
			TG3- Rural Exception Housing	SS2; H1; H2	Y			
			TG4- Land at Titley Farm	SS1; SS2	Y			

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received				Response	Amendments to Titley Group draft NDP
			TG5- Land at Church Wood, Titley	SS1; SS2	Y		refused a reserved matters application (LPA ref 181476/RM) for access for the original scheme on highway grounds (a further application LPA ref 190122/RM awaits determination). The Parish Council has consistently highlighted the highway safety issues associated with the site. There are also concerns regarding its poor relationship with the overall linear character of the village. The continued exclusion of the site from the settlement boundary is justified on these grounds.	
TG6- Titley Settlement Boundary	SS2; RA2	N	The exclusion of the Balance Barns planning permission site does not make sense. Outline planning permission has already been granted, determined in accordance with the existing adopted Core Strategy. It is recommended that this site is therefore included within the boundary.					
TG7- Land opposite Old	SS2; RA2	Y						

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received				Response	Amendments to Titley Group draft NDP
			Court Cottage/Newt on, Staunton- on-Arrow				<p>In any event, the Parish Council does not accept that this is a matter of general conformity. The NDP meets the minimum housing requirement and a settlement boundary for Titley is defined. Beyond these legitimate strategic concerns, the detail of the settlement boundary is for local determination.</p> <p>Response to comment on policy TG8: Agreed.</p>	
			TG8	N/A	Y	Entitling the policy would make it more consistent with the rest of the plan.		
			TG9- Staunton-on- Arrow settlement boundary	SS2; RA2	Y			
			TG10- Economic Development in Titley Group	SS5; RA5; RA6; E1; E3; E4	Y			

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received			Response	Amendments to Title Group draft NDP	
			TG11- Infrastructure	SS1; SS5; E3	Y	<p>The policy appears to be covering 2 quite different types of infrastructure provision in broadband and sustainable transport.</p> <p>Logically, it is recommended that these are perhaps better contained within their own separate policies.</p>	<p>Response to comment on policy TG11: both broadband and sustainable transport are infrastructure. They are clearly distinguished within the policy. The policy is clearly written and unambiguous (NPPF para. 16 d)).</p>	<p>Policy TG8: correct typo. as indicated.</p> <p>Policy TG11: no change.</p>
			TG12- Renewable Energy	SS7; SD2	Y			

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received				Response	Amendments to Titley Group draft NDP
			TG13- Community Facilities	SS1; SC1	Y		Response to comment on policy TG14: whilst it is impracticable to list all important views and local features due to the size of the Neighbourhood Area, there is merit in confirming more precisely the kinds of features/views by type and example in the supporting	
			TG14- Natural Environment	SS6; LD1; LD2; LD3; SD3; SD4	Y	Important views and features of interest are quite a subjective matter, particularly for the purposes of determining planning applications. It would give the policy greater clarity if these were defined and/or listed, either in the policy or supporting text.		

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received				Response	Amendments to Titley Group draft NDP
			TG15- Historic Environment	SS6; LD4	Y		text to the policy. A suitable change is proposed.	Delete third sentence of para. 8.4 and replace with: “Responses to the residents’ survey emphasise the importance of protecting landscape character and the contribution made by woodland (including ancient woodland and trees), copses, hedgerows, watercourses, meadow grassland and wildlife habitats such as ponds and traditional orchards. The survey identified the following local features and views thereof as of importance: Wapley Hill, Flintsham and Titley Pools, Eywood Park,
			TG16- Design and Access	SS1; SS4; SS6; SS7; MT1; SD1; SD2.	Y			

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received				Response	Amendments to Titley Group draft NDP
								Stagg Meadow, Mowley Hill and Staunton mound.”
Herefordshire Council (HC) (Strategic Housing)			I am happy with the NDP14 with exceptions on the tenures, these would need to be negotiated at the time of development being brought forward to enable them to reflect with the needs data.				Noted.	No change.
Herefordshire Council (Transportation and Highways)	Policy TG5 3)	C	The accesses should be designed in line with our design guidance and appropriate visibility and design.				Local Plan Core Strategy policy MT1 will apply to planning applications coming forward for these sites, ensuring that highway standards are applied and met. No further reference is needed in the NDP.	No change.
	Policy TG7 5)	C	Appropriate visibility should be achieved and kept clear for this development.					

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Titley Group draft NDP
Herefordshire Council (HC) (Air, land and water protection)	NDP/Policy TG4		<p>I refer to the above and would make the following comments with regard to the above proposed development plan. It is my understanding that you do not require comment on Core Strategy proposals as part of this consultation or comment on sites which are awaiting or have already been granted planning approval.</p> <p>Having reviewed records readily available, I would advise the following regarding the five proposed housing site allocations (policies TG4, TG5, TG7, TG8) as indicated in brown on 'Plan 4: Titley site allocations and settlement boundary' & 'Plan 5: Staunton-on-Arrow site allocations and settlement boundary'.</p> <p><u>Policy TG4: Land at Titley Farm</u></p> <p>Regarding sites with a historic agricultural use, I would mention that agricultural practices such as uncontrolled burial of wastes or excessive pesticide or herbicide application may be thought</p>	<p>Contamination is a material planning consideration and is addressed within the NPPF and Local Plan Core Strategy policy SD1. The comments made on policies TG4, TG7 and TG8 are noted.</p> <p>Proposals coming forward as planning applications for these sites will be considered under the existing planning policy framework. No further reference is needed in the NDP.</p>	No change.

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Titley Group draft NDP
			of as potentially contaminative and any development should consider this.		
	Policy TG5		A review of Ordnance survey historical plans indicate that the proposed development is adjacent to a cemetery or graveyard and as such it is possible that unforeseen contamination may be present. Consideration should be given to the possibility of encountering contamination as a result of its former uses and specialist advice be sought should any be encountered during the development.	This allocation is no longer to be proceeded with (see comments by Historic England, below).	See response to comments by Historic England below.
	Policy TG7		A review of Ordnance survey historical plans indicate the site is currently being used as an orchard. 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.	See above.	No change.

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Titley Group draft NDP
	Policy TG8		<p><u>1.Land west of Jacobs Oak</u></p> <p>A review of Ordnance survey historical plans indicate that the proposed development is adjacent to a former saw mill (south of the site). It is possible that unforeseen contamination may be present at the above mentioned site. Consideration should be given to the possibility of encountering contamination as a result of its former use and specialist advice be sought should any be encountered during the development.</p> <p><u>2. land east of the Old Vicarage.</u></p> <p>A review of Ordnance survey historical plans indicate there have been no previous historic potentially contaminative uses at the proposed development site.</p>	See above.	No change.

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Titley Group draft NDP
	NDP	C	<p>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.</p> <p>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.</p>	See above.	No change.

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Titley Group draft NDP
			<p>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.</p> <p>These comments are provided on the basis that any other developments would be subject to application through the normal planning process.</p>		
Coal Authority	NDP	C	<p>Thank you for consulting The Coal Authority on the above. Having reviewed your document, I confirm that we have no specific comments to make on it.</p> <p>Should you have any future enquiries please contact a member of Planning and Local Authority Liaison at The Coal Authority using the contact details above.</p>	Noted.	No change.

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Titley Group draft NDP
Dwr Cymru Welsh Water	NDP	S/C	<p>Welsh Water appreciates the opportunity to respond and we offer the following representation:</p> <p>Given that the Neighbourhood Plan has been prepared in accordance with the Herefordshire Council Core Strategy, we are supportive of the aims, objectives and policies set out.</p>	The support for the vision, objectives and policies of the NDP is welcomed.	No change.
Environment Agency	NDP	C	<p>I refer to your email of the 27 November 2018 in relation to the above Neighbourhood Plan (NP) consultation. We have reviewed the submitted document and would offer the following comments at this time. 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</p>	Noted.	No change.

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Titley Group draft NDP
			<p>accommodate growth for the duration of the plan period. We would not, in the absence of specific sites allocated within areas of fluvial flooding, offer a bespoke comment at this time. You are advised to utilise the attached Environment Agency guidance and pro-forma which should assist you moving forward with your Plan. However, it should be noted that the Flood Map provides an indication of 'fluvial' flood risk only. You are advised to discuss matters relating to surface water (pluvial) flooding with your drainage team as the Lead Local Flood Authority (LLFA). I trust the above is of assistance at this time.</p>		
Historic England	NDP & Policy TG5		<p>Thank you for the invitation to comment on the above Neighbourhood Plan.</p> <p>Historic England is generally supportive of both the content of the document and the vision and objectives set out in it.</p> <p>We commend the fact that the Plan has an extremely sound evidence base that includes reference to the Herefordshire</p>	<p>The support for the vision and objectives of the NDP, its evidence base and the proportionate approach taken is welcomed.</p> <p>In respect of policy TG5 (land at Church Wood Titley), the</p>	<p>Delete policy TG5 and associated supporting justification, and make consequential amendments including to textual cross-references, Plan 4, Table 1 and Table 3, and policy/para. numbering.</p>

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Titley Group draft NDP
			<p>Council Historic Environment Record and County Landscape Character Assessment.</p> <p>The emphasis on the conservation of local distinctiveness and variations in local character through good design including through adherence to clear Design Principles evidenced through the Design and Access Policy (TG16) and the protection of historic farmsteads, landscape character and locally significant views is to be applauded.</p> <p>Historic England does, however, have concerns with reference to the proposed housing allocation for land at Church Wood, Titley. Historic England cannot at this point support the allocation of this site in the Neighbourhood Plan for a housing development of two dwellings.</p> <p>This would be to accept the principle of development before it has been made clear what the actual impact of any development would be on the listed buildings in the vicinity and their settings and we are not convinced at this stage that no harm would be caused to these designated heritage assets. It should be noted in this context that the National Planning</p>	<p>points made in the comment have been carefully considered. It is acknowledged there are legitimate concerns in respect of potential impacts on designated heritage assets and archaeological interest. Regard has been had to the healthy position in respect of overall housing delivery, such that the allocation is not required to meet strategic housing requirements. It is also the case that there is another housing allocation at Titley, for around six dwellings, so that local housing needs for smaller accommodation may still be addressed. Taking all</p>	

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Titley Group draft NDP
			<p>Policy Framework (NPPF) paragraph 194 requires that “Any harm to, or loss of, the significance of a designated heritage asset.....should require clear and convincing justification”.</p> <p>Further, we note the existence at least adjacent to the site proposed for housing of “The Old Priory” with surviving earthworks to the west. The neighborhood plan itself notes that this aspect will require archaeological desk-based assessment and potentially physical archaeological evaluation and in our view this should also be undertaken prior to any formal housing allocation being made. This is in order to clarify the significance of any buried deposits identified and whether they may warrant “preservation in situ”.</p> <p>Whilst not wishing to lodge a formal objection at this stage we would very much welcome an early detailed discussion about the proposed allocation with both the neighbourhood plan team and the local planning authority (who have in-house archaeological expertise) in order that these issues can be addressed.</p>	<p>these factors into account, it is no longer intended to proceed with the site allocation at policy TG5.</p>	

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Titley Group draft NDP
			<p>To these ends Sarah Lewis, our Inspector of Historic Buildings and Areas will be happy to be contacted to progress this further at this address (or can be reached on 07824 526 859) and you will see I am copying both her, our Assistant Inspector of Ancient Monuments, Alison MacDonald and the Herefordshire County Archaeologist, Julian Coton into this response.</p> <p>In conclusion, and notwithstanding our concerns, overall the plan reads as a well-considered, concise and fit for purpose document which we consider takes a suitably proportionate but very thorough approach to the historic environment of the Parish.</p> <p>I hope you find these comments helpful and hope that further discussions will prove productive.</p>		
Natural England	NDP	C	Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Natural England is a statutory consultee in	Noted.	No change.

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Titley Group draft NDP
			neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made. Natural England does not have any specific comments on this draft neighbourhood plan. However we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan.		

Table A4.2: Community and other comments: Staunton-on-Arrow

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Titley Group draft NDP
Russell Abson	Policy TG9	C	The boundary line appears very over restrictive – there are many potential areas for infill outside the boundary. This is not logical? I think the idea of a small development around a new village green is absolutely fantastic!	The settlement boundary has been drawn to define the main built-up form of the village in line with Herefordshire Council guidance. No specific areas for inclusion have been suggested in this response. The support for the development proposed in policy TG7 is welcomed.	No change.
Robert Bennett	NDP	S	A very good plan with the future generations being catered for with young families being encouraged to the area. It is a fact that we were all young once.	Noted.	No change.
Martin Booty	Para. 6.4, Policy TG7	C	I think that the development area suggested of 15% is too small to accommodate five 2/3 bedroom dwellings with driveways and garages and gardens.	The percentage area specified in policy TG7 has been reviewed by the Steering Group in light of	Amend policy TG7 criterion 2 to provide for new dwellings on up to 25% of the site to include all necessary

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Titley Group draft NDP
				this and other comments. It is considered that the development area should be increased to 25% on the basis that this is to include all necessary associated requirements such as gardens, garages, on-site parking and site access. This will enable the scheme to better reflect the character and existing low residential density of the village. The policy requirement to provide around five dwellings of a type and size to meet housing needs including for smaller accommodation will remain.	associated requirements such as gardens, garages, on-site parking and site access. Consequential amendments to the open space percentage (from at least 85% to at least 75%) and to the supporting text.
	Para. 6.10	S	I agree with proposal 1 and 2.	Noted.	No change.

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Titley Group draft NDP
	Policy TG4	S	I agree with the proposal.	Noted.	No change.
	Policy TG5	S	I agree with the proposal.	The draft allocation of land for housing at Church Wood is to be deleted (see response to comment by Historic England above).	See change in response to comment by Historic England, above.
Rosemary Bowen	Chapter 6, Policy TG9	C	<p>Land for housing in Staunton-on-Arrow – TG9</p> <p>As a resident of this village for the last 26 years I question the need for these 5 extra so called affordable houses. What does this mean for the local residents, bearing in mind that we have already, I believe, filled our quota for houses in this village. So who would this benefit?</p> <p>Extra houses would increase the traffic in a village which already has a very heavily used road by large tractors and trailers thundering by on a daily basis, causing misery to the local residents.</p>	Staunton-on-Arrow is one of the rural settlements identified in the Local Plan Core Strategy where new housing will be appropriate. Sustainable housing growth is supported in these villages to maintain and strengthen locally sustainable communities. The allocation is intended to help meet locally-expressed housing requirements for smaller	No change.

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Titley Group draft NDP
			<p>In my opinion we do not have the infrastructure to support more housing. We have no shops or buses to sustain young families.</p> <p>I therefore question whether this proposed development would respect the natural and historic environment within the settlement boundary of this village.</p>	<p>accommodation, self-build and live/work. It will help bolster existing services, improve facilities and infrastructure and meet community needs. The housing requirement in the Local Plan Core Strategy is a minimum, not a quota or target.</p>	
Ann Brisbane	Para 6.2 (policy TG7)	S	Site for 5 dwellings suitable for young families.	Noted.	No change.
	NDP	C	As there are a lot of elderly in Staunton-on-Arrow I think there ought to be a bus service once a week. Hopefully the houses that are built will be in keeping with the village.	Public transport provision is outside the scope of the NDP, but is to be addressed via a Community Action (CA6). NDP policy TG16	No change.

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Titley Group draft NDP
				deals with design requirements.	
Mr and Mrs Andrew Burton	NDP	S	The draft in its entirety, except	Noted.	No change.
	Para. 6.4 (policy TG7)	O to the 85/15 split	70/30 is more appropriate if the proposed development is to include a road, parking, a garage and small garden.	See response to comment by Martin Booty, above.	See change in response to comment by Martin Booty, above.
	NDP	C	We are a local business employing local people. Smaller properties would be ideal to house and introduce younger families to our villages.	The site allocations in the NDP are intended to help address local requirements for housing suitable for young families.	No change.
Laura Claire Burton	Para. 6.4, policy TG7	C	I think that the development area suggested of 15% is too small to accommodate five 2/3 bedroom dwellings with driveways and garages and gardens.	See response to comment by Martin Booty, above.	See change in response to comment by Martin Booty, above.
	Para. 6.10	S	I agree with proposal 1 and 2.	Noted.	No change.
	Policy TG4	S	I agree with the proposal.	Noted.	No change.

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Titley Group draft NDP
	Policy TG5	S	I agree with the proposal.	The draft allocation of land for housing at Church Wood is to be deleted (see response to comment by Historic England above).	See change in response to comment by Historic England, above.
Will Burton	Page 23/24 (policy TG7)	O to the percentage split of 15/85%	Spread over 1.4 ha. for 5 small dwellings, their driveways, access road, garage and small garden it leaves 420 m2 per dwelling compared to an average across the road of 1102 m2, which doesn't include a roadway. Section 6.6 suggests it follows the character and low residential density of the village. A split of 30/70 would be more appropriate.	See response to comment by Martin Booty, above.	See change in response to comment by Martin Booty, above.
Paul and Julie Cooper	Policy TG1, objective 4	C/S	Crucial to the acceptance of any development is the conservation and enhancement of the natural and historic environments. Avoiding loss of visual amenity, particularly of neighbouring properties, must be a critical decision for any new development.	The conservation and enhancement of the natural and historic environments is addressed in NDP policies. NDP policy TG16 protects residential amenity.	No change.

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Titley Group draft NDP
	Policy TG1, objective 5	C	Note that there is no public transport through Staunton on Arrow. Improvements to the current footpaths would be a good start.	Public transport provision is outside the scope of the NDP, but is to be addressed via a Community Action (CA6).	No change.
	Paras. 4.5 and 4.6	O	One common issue with this plan is the gross over planning of new homes. The minimum requirement is 23 and yet the plan calls for 52. Just taking current developments and the anticipated natural (windfall) growth gives us a figure 56% higher than the minimum requirement. The document does not explain why an additional 16 properties are required.	The Local Plan Core Strategy supports housing growth in Titley and Staunton-on-Arrow to maintain and strengthen locally sustainable communities. The allocations in the NDP are intended to help meet locally-expressed housing requirements for smaller accommodation, self-build and live/work. They will bolster existing services, improve facilities and infrastructure and meet	No change.
	Para. 4.8	C	The residents' survey called for smaller, lower cost properties but without the necessary services and infrastructure, these properties might not be viable.		

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Titley Group draft NDP
				community needs. The housing requirement in the Local Plan Core Strategy is a minimum, not a quota or target.	
	Para. 4.10	S	With an ageing population, any new properties should include housing for older people.	NDP para. 4.10 recognises this aspect of community housing requirements.	No change.
	Policy TG3	C	Have the rural exception sites been identified?	Policy TG3 is an enabling policy indicating support for the principle of a rural exception scheme. Sites are not usually identified in development plans, but are brought forward as planning applications. Community Action CA1 refers.	No change.
	Para. 6.2	O	As much as I support the need for housing for young families, there are no recreational services for young children in	Staunton-on-Arrow is one of the rural settlements	No change.

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Titley Group draft NDP
			Staunton on Arrow. We mustn't just build new homes without also providing facilities for youngsters.	identified in the Local Plan Core Strategy where new housing will be appropriate. The allocation will help bolster existing services, improve facilities and infrastructure and meet community needs. The open space aspect of the proposal creates an opportunity to provide facilities for outdoor play.	
	Para. 6.6	C	I propose changing the phrase "should reflect the character" to " <u>must</u> reflect the character".	Such a definitive form of words is not appropriate since planning decisions have to take into account other material considerations as well as the development plan.	No change.

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Titley Group draft NDP
	Policies TG7 and TG8	C	Is it appropriate that these sites are within earshot and within odour range of the digester on the bend in the road? The digester is already a source of controversy amongst local residents.	The anaerobic digester is a permitted development to which regard has been had in developing the proposals.	
	Para. 7.3	S	I strongly agree with the need for better broadband. It should be real broadband and not the proposed Airband solution for the area.	Noted.	No change.
	Para. 7.10	S	I support the restriction of traffic along Mowley Lane, particularly over-sized farm vehicles using the narrow lane to shuttle farm products between distant farms.	Highway matters are outside the scope of the NDP: see Community Action CA5.	No change.
	Policy TG11	S	Strongly agree.	Noted.	No change.
	Policy TG13	S	I agree with the need for more community facilities. Staunton on Arrow needs a pub. Has anyone considered running a pop-up bar in the village hall?	This is outside the scope of the NDP.	No change.
	Policy TG15,	S	Agree.	Noted.	No change.

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Titley Group draft NDP
	objective 3				
	Policy TG16	C	I agree with these objectives but I propose that the phrase “proposals should achieve” be strengthened and changed to “proposals <u>must</u> achieve”.	Such a definitive form of words is not appropriate since planning decisions have to take into account other material considerations as well as the development plan.	No change.
	Policy TG16	C	I propose that an additional objective 8 be added which shall ensure that existing views are not obstructed or adversely affected by the construction of new properties, particularly views from adjacent properties.	Although there is no right to a view, criterion 5 to policy TG15 covers impacts on residential amenity which would include issues of loss of privacy or overlooking.	No change.
Mr. Michael Dickson	NDP	C	1. Thank you for providing a copy of the Titley Group Neighbourhood Development Plan for comment. Even as a comparably new resident to the area I recognise the importance of planning for the future.	Noted.	No change.

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Titley Group draft NDP
			<p>2. I am particularly interested in the development plan as I aspire to take advantage of flexible and home working opportunities offered by my employer. This would allow me to increase the time I can spend at home and in the surrounding areas.</p> <p>3. I have taken time to read the plan and wish to offer the following input.</p>		
	Para. 2.8	C	Suggested change: if practicable a further break down of age groups should be included. It can be inferred that 62.9% of the population of the area is aged between 16 and 64. Breaking this down further into 16 to 39 and 40 to 64 would give a better indication on the popularity of the area to the “younger generation”, which has been specifically identified as a target audience in the vision at para 3.4	Agreed; further breakdown to be provided.	Amend para. 2.8 to include reference to the following age groups: 16 to 44, 28% (County 32.9%) 45 to 64, 34.7% (County 28.6%)
	Paras. 3.4 and 7.3	C	Paragraph’s refer to younger generation and younger people. These terms are highly subjective and should be defined to prevent confusion or mis-interpretation.	Further definition of these terms is not necessary in understanding the vision or the rationale of policy TG10.	No change.

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Titley Group draft NDP
	Para. 3.4	S in most respects	Support the vision, in particular recognising the needs of the younger generation. That said, we exist in a time of increasingly flexible and diversified employment opportunities that include home working, flexible working, self-employment etc. I feel that the vision should reflect this and not focus on local employment in the traditional sense.	Agreed. Such aspects of local employment are supported by policy TG10.	Amend Vision bullet 3 to include reference to home working, flexible working, and self-employment.
	Policy TG1 point 2	S	The recognition of new and diversified employment opportunities is particularly important if the area is seeking to attract a younger generation.	Noted.	No change.
	Policy TG6	S with caveats	I support the identification of the Titley settlement boundary to prevent uncontrolled development beyond the settlement boundary. Currently the proposed policy specifically relates to housing, it may be prudent to expand this to also include development of existing buildings or sites. In particular this should enable home or flexible working. I agree that any development would need to respect the settlement character, the natural and historic environments and heritage assets.	NDP para. 5.17 already addresses this point but it is agreed that an adjustment to the policy would be in order. For consistency this change is also to be made to policy TG9.	Amend policies TG6 and TG9 to refer to development proposals for housing and other uses within the settlement boundary.
	Para. 7.3	S	In particular "Other suitable ways to sustain and grow the local economy were seen as facilitating home working" and	Noted.	No change.

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Titley Group draft NDP
			"Comments emphasised the need to provide more jobs for younger people".		
	Policy TG10	S	Particularly para 3, "extensions to existing dwellings needed to enable home working." I see this as a crucial policy for attracting a defined target audience into the village and the surrounding area. The desire for home working and flexible working continue to grow and adopting a policy that facilitates this will help to sustain area.	Noted.	No change.
Barbara Dyke	Para. 6.2	O	I am objecting to the number of properties. A max. of 3 would be more appropriate.	Five dwellings is a suitable indication of potential bearing in mind the expressed requirement for accommodation for young families.	No change.
	Para. 6.3 and 6.6	C	There are houses opposite the site as well as bungalows.	Agreed. A suitable change will be made.	Amend paras.6.3 and 6.6 as indicated.
	Para. 6.4	C	A village car park would be of more use than a village green.	It is agreed that a village car park would be a useful	Amend para. 6.4 and policy TG7 criterion 1 to include

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Titley Group draft NDP
				additional facility, to be provided within the open space area.	reference to an area of public car parking to be provided as part of the open space.
	Para. 6.9	O	Land should not be passed to Parish Council to upkeep as there will be no funds or enough volunteers to do this.	The arrangements for the provision and maintenance of facilities have not yet been determined.	No change.
	Para. 6.11	O	I am objecting to the removal of the roadside hedge.	It is agreed that the existing roadside hedge should be retained as far as possible given the need to meet highway authority requirements for junction design and visibility.	Amend para. 6.11 and policy TG7 criterion 7 to provide for the retention of as much of the existing roadside hedge as is consistent with highway authority requirements for junction design and visibility.
Debbie Edwards	Policy TG3	S 2-3 bedroom houses in Staunton on Arrow	Rural exception housing needed if cannot specify affordable houses on smaller sites – law needs to change and not try to “ghetto-ise” lower cost housing in our villages – always seemed mixed up in the past! ie. cottages next to larger houses.	Noted.	No change.

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Titley Group draft NDP
		(and Titley ideally!)			
Gary Edwards	NDP	C	Thank you for all the work in trying to give everybody a voice and produce as democratic a plan as possible given the circumstances.	Noted.	No change.
	Para. 6.2 and 6.3	S	There has been a need for more housing for some time. The track is already used and has ample vision onto road.	Noted.	No change.
	Para. 6.4 (a)	S	The village has not had this type of amenity in living memory, what a wonderful place for the village, it would be used by many, can only be good.		
	Para. 6.4 (b)	S	As the houses would only be using such a small area of the whole site the impact would be reduced.		
	Para. 6.6	S	Houses sited to the rear of the site will reduce any impact, noise etc for those living to the opposite side of the road.		
	Chapter 6	C	The village has had minimal new housing in the last 40 years, new people bringing new skills to the village can only be a good		

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Titley Group draft NDP
			thing, hopefully these houses would appeal to younger people as the majority of villagers are of an older generation.		
Maureen Edwards	Para. 6.2	S	There is a need for housing for younger families, it would have to be affordable. We need to keep/attract younger people and this is the only way.	Noted.	No change.
	Para. 6.4 (a)	S	What an asset a village green/recreational area would be. An area of this size would be a welcome addition to the centre of the village.		
	Para. 6.6	S	If the housing is sited to the rear of the site with the open space/green to the front then the impact of the housing would be greatly reduced.		
	Para. 6.7	S	If vehicular access is taken to the rear of the houses the noise and visual impact would be reduced.		
	Chapter 6	C	There are few young people/families within the boundaries. Most homes are lived in by older people/couples. If nothing is done to attract younger families to affordable housing then this		

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Titley Group draft NDP
			village will soon resemble a retirement site. This village needs young people and this is the only way it would be affordable.		
Neville Edwards	Para. 6.2	S	2-3 bedroom dwellings could attract younger people and families, the village needs young people.	Noted.	No change.
	Para. 6.3	S	The track has been used for years and has good visibility to the road.		
	Para. 6.4	S	A village green would be a good addition to the village and could be used by so many for social events.		
Mr. and Mrs. P. Edwards	Para. 6.2	C	Close proximity of AD plant and lagoon and vehicle movements! Tractors. Need for young families? Why was application turned down at Horseway Head! Young applicant. Where will this people find work. Who will be maintaining the “open space”?	The anaerobic digester, digestate storage tank and associated vehicle movements are permitted developments to which regard has been had in developing the proposal. A requirement for accommodation for young people and families has been	No change.

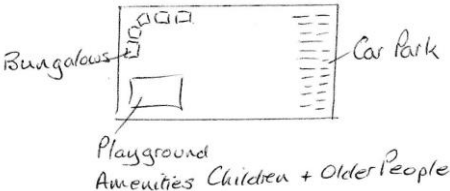
Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Titley Group draft NDP
				expressed in NDP consultations. Arrangements for the maintenance of the open space have not yet been determined.	
	Policy TG7	C	I personally have no faith in the Council to see that these plans will be adhered to. My evidence of this? AD plant allowed in the centre of a small village. What a disgrace!! Who's speaking up for residents opposite the 5? house development? Spare a thought for them!!	The NDP will form part of the statutory development plan. Planning applications must be determined in accord with the development plan unless material considerations indicate otherwise.	No change.
Sandra Evans	Para. 6.2	C	5 one bedroom/or two bungalows for elderly/disabled with a connection to Staunton-on-Arrow.	The proposal is responding to a requirement for accommodation for young people and families which been expressed in NDP consultations. However,	No change.

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Titley Group draft NDP
				NDP para. 4.10 recognises the need to consider housing for older people as an aspect of community requirements.	
	Para. 6.7	C	One-way system for cars. Village car park at end of new village green.	Traffic management is outside the scope of the NDP. Community Action CA5 refers. For village car park and hedge, see response to comment by Barbara Dyke, above. Re the proposed frontage footpath, in response to this and other comments this requirement will be deleted from the policy.	Village car park and hedge: see change in response to comment by Barbara Dyke, above. Amend policy TG7 criterion 6 to delete reference to roadside footway.
	Para. 6.11, policy TG7 6)	C	No need to remove hedge and no need for a footpath, unless all the way to village hall and church.		
	Policy TG11	C	We need better mobile phone reception in Staunton-on-Arrow.	This is outside the scope of the NDP. Community Action CA7 refers.	No change.

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Titley Group draft NDP
	Policy TG7	C	<p>My thoughts for the Commercial Orchard site</p> <p>Five bungalows on the north and east corner, arranged in a horseshoe for older or disabled people, because:-</p> <p>A. advantage of being in the middle of the village and able to walk to the church, post box and village hall.</p> <p>B. benefit the whole community, by having a shared responsibility for other people.</p> <p>C. car parking spaces on the south end for village events and prevent parking on the narrow part of the road, weddings, funeral, concerts etc.</p> <p>D. defibrillator available in the village hall, the elderly more likely to have need for it, and therefore it is easily accessible.</p> <p>E. encourage sharing the wealth of experience seen in older people, history of the village kept alive, especially with the Mound and church history etc.</p>	The proposal is responding to a requirement for accommodation for young people and families which been expressed in NDP consultations. NDP para. 4.10 recognises the need to consider housing for older people as an aspect of community requirements.	No change.

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Titley Group draft NDP
			<p>F. foster community relations with local schools who are using our church in Staunton.</p> <p>G. good use of limited resources – peripatetic chiropodist, hairdresser and possibly a GP clinic, for those use the services most.</p> <p>H. help to integrate the older generation and reduce loneliness.</p> <p>I. investigate grants, the benevolent funds and charity initiatives etc for housing the elderly.</p> <p>J. joining activities (perhaps even older people’s playground on the green, for exercise) and to participate in or observe activities and recreation, on the green eg Village Fayre.</p> <p>K. keeping on eye on each other, ie if curtains are drawn or not (hence horseshoe formation).</p> <p>L. local employment for carers, cleaners, gardeners etc.</p> <p>M. mix with all generations in the community.</p>		

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Titley Group draft NDP
			<p>N. no extra traffic in the Village, if bungalows were for the elderly, as they are less likely to be driving cars. If there were 5 affordable houses for families, in a straight line, a potential of 10 extra cars – an increase of 30% as we only have 19 drivers in the Village to date.</p> <p>O. operate a one-way system for cars, to avoid hazards with farm machinery, tractors etc (P24 6.</p> <p>P. potential problem with digester lagoon reduced, as elderly people would probably not go near it, whereas children's curiosity could prove hazardous.</p> <p>Q. quality of life for the elderly in our peaceful village, preventing isolation and associated poor health, depression etc.</p> <p>R. relatives and people with a long-standing connection should have priority.</p> <p>S. supporting each other by keeping a watchful eye out.</p> <p>T. transport such as utilising the school bus, so the elderly can use their bus passes.</p>		

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Titley Group draft NDP
			<p>U. understanding the needs of the elderly in our community in the 21st century. Increasing need for mobile phones, to prove identity and prevent fraudulent activity.</p> <p>V. voluntary opportunities for student work experience, and volunteers.</p> <p>W. watching all the recreational activity on the village, so stimulating the 5 senses.</p> <p>X. xtend life expectancy and quality of life.</p> <p>Z. zero emissions from traffic, promoting enhanced quality as fewer drivers.</p>  <p>The diagram is a hand-drawn site plan within a rectangular border. At the top left, there are several small squares representing buildings, labeled 'Bungalows'. At the bottom left, there is a larger square labeled 'Playground Amenities Children + Older People'. At the right side, there is a vertical rectangle with horizontal lines inside, labeled 'Car Park'.</p>		

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Titley Group draft NDP
Shannon Hill	Staunton on Arrow	S	Think it's a very good idea. Like the idea of smaller properties to encourage more families into the village.	Noted.	No change.
Mr and Mrs A Jacobus	Chapter 6	S/C	Generally a VG draft document. Can only comment on Staunton on Arrow section(s). Proposal seems reasonable. Concerns are for infrastructure: roads, schools, etc. plus water table. "Care" balance (equitable) between residential and commercial activities. Stockley Cross (and others) is outside the settlement boundary. What does this mean?	Staunton-on-Arrow is one of the rural settlements identified in the Local Plan Core Strategy where new housing will be appropriate. Sustainable housing growth is supported in these villages to maintain and strengthen locally sustainable communities. Growth will help bolster existing services, improve facilities and infrastructure and meet community needs. Those parts of the Neighbourhood Area outside the settlement boundaries are in	No change.

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Titley Group draft NDP
				countryside in planning terms (see NDP para. 4.3).	
Julia Johnstone	Chapter 6	C	Any new housing should be sensible size. Have good gardens in keeping with village and must have good private parking.	The amendments proposed to policy TG7 will help ensure these requirements are met.	No change.
Matt and Anita Lloyd	Paras. 3.4, 3.7, 3.9, Policy TG1, Para 7.2, 7.3, 7.5, Policy TG10	C	We welcome the support of the NDP for local businesses providing employment. However we do think that the NDP and the wider community need to be more realistic about employment in the village. The results of the survey show a lot of residents are somewhat naive about the economics of agriculture and rural enterprise in terms of employment opportunities. There are only a handful of mixed smaller scale farms in the village and at best these create limited and lower paid employment opportunities. There seems to be some conflict between the support for additional housing and for small businesses offering employment opportunities, but on the other hand not supporting larger scale farming and renewables in favour of agricultural forestry and home working for employment/income. That is unlikely to provide sufficient	Policy TG10 is intended to support a wide range of types of economic development within a framework which allows other legitimate social and environmental concerns to be taken into account. Whilst avoiding being over-prescriptive, the aim is to support new businesses and other forms of economic development which enable	No change.

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Titley Group draft NDP
			employment opportunities to enable young people to stay and work in the village, nor to buy a house here. Similar concerns apply to those from outside the village who may want to move to the new homes to be built. We would welcome a slightly more open approach to the types of business and employment that can be supported in order for the village to support (economically) existing and new residents.	the diversification of the rural economy.	
	Policy TG7, and para 4.6	C	<p>Regarding the village green idea, we think it would be more suitable to treat this like Stagg Meadow and have it available for village use but not a more general public open space that could increase traffic in the village with visitors.</p> <p>We don't support removing the roadside hedgerow and would prefer to see it retained apart from access points.</p> <p>We don't support the proposal for a footway along the site frontage. If a footway was felt necessary, and the hedgerow was retained, the footway could go behind the hedge on the field side rather than next to the roadway. This would be safer for pedestrians with the volume of heavy agricultural traffic, and it also discourages parking.</p>	<p>Hedge: see response to comment by Barbara Dyke, above.</p> <p>Footway: see response to comment by Sandra Evans, above.</p> <p>Policy TG7 proposes around five dwellings on this site, not 10 (this refers to an</p>	<p>See change in response to comment by Barbara Dyke, above.</p> <p>See change in response to comment by Sandra Evans, above.</p> <p>No change.</p>

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Titley Group draft NDP
			With regards to the additional 10 housing plots proposed, we understand that the minimum 'quota' for housing over the period of the plan (23) has already been met. We appreciate that it is appropriate to provide for additional houses, but the overall figure proposed of 52 seems rather high. If 10 are put up all at once then that could limit the ability for later smaller sites to come forward in future that might be more in keeping with existing style of housing layout in the village, or for one off self builds and the like.	earlier proposal which has been amended following consultation). Staunton-on-Arrow is one of the rural settlements identified in the Local Plan Core Strategy where new housing will be appropriate. The housing requirement in the Local Plan Core Strategy is a minimum, not a quota or target. Other sites could come forward for infill development within the settlement boundary.	
Mr. R.S. Petrie and Mrs. J. Petrie	Policy TG7, para. 6.2.	O	5 dwellings too many for small village with narrow roads, high volume of farm traffic. Occupants will have to travel for work and local doctor's surgery can hardly cope now.	The allocation is intended to help meet locally-expressed housing requirements for smaller accommodation, self-build and live/work. It	No change.

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Titley Group draft NDP
				will help bolster existing services, improve facilities and infrastructure and meet community needs.	
	Policy TG7, para. 6.4.	C	If houses are built with a village green who will provide the upkeep. Upkeep of the churchyard is by local volunteers, which are in short supply, and 3 that do are 65, 70 and 80 years old.	Arrangements for the maintenance of the open space have not yet been determined.	No change.
	Policy TG7, para. 6.11.	C	The old existing roadside hedge should be left in place for wildlife and to screen proposed development from existing properties.	See response to comment by Barbara Dyke, above.	See change in response to comment by Barbara Dyke.
Debbie Stokes	Para. 6.4	C	The open space needs to be big enough to be of use to the village, eg a fete. Otherwise it is a white elephant. Who will maintain it? Needs to be landowner funded.	Arrangements for the maintenance of the open space have not yet been determined.	No change.
	Para. 6.6/6.9	C	Some bungalows might be a good option – fit in and good for older population perhaps.	The proposal is responding to a requirement for	

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Titley Group draft NDP
				accommodation for young people and families which been expressed in NDP consultations. NDP para. 4.10 recognises the need to consider housing for older people as an aspect of community requirements.	
	Policy TG7 6)	C	No other footway exists in any other part of the village – is this necessary?	See response to comment by Sandra Evans, above.	See change in response to comment by Sandra Evans, above.
	Policy TG7	C	Concern re digestate tank near site. Not covered and accessible to children playing. Toxic (so sign says).	The digestate storage tank is located 350m east of the village. It is a permitted development on private land with no adjacent public right of way.	No change.

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Titley Group draft NDP
	Policy TG7	C	If this development went ahead it would be very good for village traffic if some additional car park spaces made. Perhaps (10-12). Always a problem with every function at church or hall.	See response to comment by Barbara Dyke, above.	See change in response to comment by Barbara Dyke.
	Policy TG8, para. 6.10	O	Land west of Jacobs Oak. I will object to this site. It is much higher than the road and so access will be a problem onto the narrow lane. I also believe the plot of land was sold saying only 1 dwelling on the plot of land. We have issues with developments on raised ground at the Old Court Farm. The digester and the new building stand out massively as they are several feet higher than the road alongside, making them appear much bigger (a fact planners seem to have ignored). Also the plot would lead to yet another house that starts off small, but because of scope to build round would become another home not available (affordable) to the youth of Herefordshire to live in.	The site has frontage onto Horseway Head and there are adjoining dwellings to both east and west. It is suitable and available for development.	No change.
	NDP	C	I would like to thank the volunteers on the steering committee for their hard work.	Noted.	No change.

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Titley Group draft NDP
Mrs. Jenny Thomas	Policies TG3 and TG7	O	TG7(3) refers to “type and size to help meet the latest assessment of housing needs”. It is disappointing that this scheme does not include rural exception housing which is to be “affordable housing in perpetuity”. TG7 may not continue to help local people and their children when grown up to stay in the locality, in the long-term. My suggested change is that the development under TG7, or at least part of it, should be of the rural exception type (TG3), that is “affordable housing in perpetuity”.	Rural exception housing is a different, alternative route for the provision of affordable housing in rural areas. Policy TG3 establishes support for the principle of a rural exception scheme. Sites are not usually identified in development plans, but are brought forward as planning applications. Community Action CA1 refers.	No change.
	Para. 6.13	C	There is an apparent discrepancy between the text which states the “Motte” is within the settlement boundary and Plan 5 which shows it as outside.	This is agreed.	Correct para. 6.13 re. location of the Motte outside the settlement boundary.
Mr. Nigel Thomas	NDP	C	I have read the plan and have no additional objections or comments to those made above, save to congratulate those responsible for the work and effort put in to produce a high quality Neighbourhood Plan.	Noted.	No change.

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Titley Group draft NDP
Alan Weaver	Policy TG7	O	I object to site 10 because in the small village we have no jobs in the village for the new houses if they come at site 10. No pub or village shop. Farm traffic has gone up over the last few years because local farmers have anaerobic digesters. Site 10 is between a farm and a large digest tank which has no cover and is dangerous. The footpath for site 10 is a path to nowhere, and nowhere else in the village has a footpath and do not want the hedge to be removed. Sewerage for site. It will be a big problem as we have no mains sewerage. The village has enough new houses gone up in the last 6 months to tick all the boxes. As I have lived in the village all my life I object to site 10.	<p>Need for housing: Staunton-on-Arrow is one of the rural settlements identified in the Local Plan Core Strategy where new housing will be appropriate. Sustainable housing growth is supported in these villages to maintain and strengthen locally sustainable communities. Growth will help bolster existing services, improve facilities and infrastructure and meet community needs.</p> <p>Hedge: see response to comment by Barbara Dyke, above.</p>	<p>Hedge: see change in response to comment by Barbara Dyke, above.</p> <p>Footpath: see change in response to comment by Sandra Evans, above.</p> <p>No other change.</p>

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Titley Group draft NDP
				Footpath: see response to comment by Sandra Evans, above.	
John Weaver	Policy TG7	O	<p>We have already met our minimum requirement of the local Core Strategy for Staunton-on-Arrow.</p> <p>No sewerage system. No employment. No bus service. No shop. No school. No pub. The infrastructure is not here to accommodate five houses it means at <u>least</u> ten more cars. As I understand the schools at Shobdon and Pembridge are full. Since building the Anaerobic Digester six years ago the traffic has more than doubled. Site 10 is between the AD plant and the lagoon. Please don't pull the roadside hedge out, to put a pavement that would be awful thing. I object to the site 10 proposal.</p>	Staunton-on-Arrow is one of the rural settlements identified in the Local Plan Core Strategy where new housing will be appropriate. Sustainable housing growth is supported in these villages to maintain and strengthen locally sustainable communities. The allocation is intended to help meet locally-expressed housing requirements for smaller accommodation, self-build and live/work. It will help bolster existing services, improve facilities and	<p>Hedge: see change in response to comment by Barbara Dyke, above.</p> <p>Footpath: see change in response to comment by Sandra Evans, above.</p> <p>No other change.</p>

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Titley Group draft NDP
				<p>infrastructure and meet community needs. The housing requirement in the Local Plan Core Strategy is a minimum, not a quota or target.</p> <p>The anaerobic digester and the associated digestate storage tank are permitted developments to which regard has been had in developing the proposal.</p> <p>Hedge: see response to comment by Barbara Dyke, above. To follow</p>	

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Titley Group draft NDP
				Footpath: see response to comment by Sandra Evans, above.	
Marion Weaver	Policy TG7	O	We have no need to build in Staunton-on-Arrow. We have already met requirements for the local Core Strategy. There is no need to build when the minimum requirement of the local Core Strategy will have been met without site 10. The development plan (site 10) is between two sites the anaerobic digester and the lagoon. These two sites are a great concern, when you are considering building, and the possibility of young families. The site is surrounded by a busy working farm. The land would be better used to grow crops for the anaerobic digester, saving good farmland. The infrastructure is not here and needs to be put in place before any new development needs to be considered. The roads are narrow and already busy. There is no sewerage system to support more dwellings, no school, no shops. The local schools are already full also the doctor's surgeries.	Staunton-on-Arrow is one of the rural settlements identified in the Local Plan Core Strategy where new housing will be appropriate. Sustainable housing growth is supported in these villages to maintain and strengthen locally sustainable communities. The allocation is intended to help meet locally-expressed housing requirements for smaller accommodation, self-build and live/work. It will help bolster existing services, improve facilities and	Hedge: see change in response to comment by Barbara Dyke, above. Footpath: see change in response to comment by Sandra Evans, above. No other change.

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Titley Group draft NDP
			I strongly object to the site 10 plan and the removal of the roadside hedge and the proposal to build a footpath going nowhere.	<p>infrastructure and meet community needs. The housing requirement in the Local Plan Core Strategy is a minimum, not a quota or target.</p> <p>The anaerobic digester and the associated digestate storage tank are permitted developments to which regard has been had in developing the proposal.</p> <p>Hedge: see response to comment by Barbara Dyke, above.</p>	

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Titley Group draft NDP
				Footpath: see response to comment by Sandra Evans, above.	
Mr. and Mrs. C. Weir	Vision	S	Clear.	Noted.	No change.
	Policy TG1	S			
	Policy TG2	S			
	Policy TG3	S	Good to see this.		
	Policy TG4	S			
	Policy TG5	S		The draft allocation of land for housing at Church Wood is to be deleted (see response to comment by Historic England above).	See change in response to comment by Historic England, above.

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Titley Group draft NDP
	Policy TG10	S		Noted.	Noted.
	Policy TG11	S			
	Policy TG12	S			
	Policy TG13	S			
	Policy TG14	S			
	Policy TG15	S			
	Policy TG16	S			

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Titley Group draft NDP
	NDP	C	Excellent document. Very comprehensive and informative. Look forward to final plan. Will there be an action plan?	Noted. The delivery of the NDP is dealt with at chapter 9.	No change.
David Williams and Bridget Tisdall	Policies TG6, TG8 and TG9	C	Strongly regret the lack of affordable/starter homes for young people working in the area. We understand that the proposed houses will be of the three bedroom size so presumably in the region of £300,000?	The allocations in the NDP are intended to help address housing needs including for smaller, less expensive open market accommodation.	No change.
Vanessa Woodward	Policy TG7	C	I see no requirement for further development in Staunton on Arrow. The quota has already been met and as I understand at the present time the Government would therefore not exert pressure for more dwellings to be built in the village. It seems however that according to the boundary set, (and it is difficult to comprehend such an odd shaped boundary) site 10 will eventually be developed whatever the concerns of the residents in the immediate locality regarding the suitability of the site, the subsequent increase in traffic and the total lack of infrastructure to support the increase in the population. In this case further consideration should be given to the type of development. I appreciate that although answers to the original	Staunton-on-Arrow is one of the rural settlements identified in the Local Plan Core Strategy where new housing will be appropriate. Sustainable housing growth is supported in these villages to maintain and strengthen locally sustainable communities. The allocation is intended to help meet locally-expressed housing	No change.

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Titley Group draft NDP
			<p>questionnaire supported the idea of so-called “affordable” or low-cost housing I suspect that, rather like Brexit, many of us did not quite appreciate what we might be letting ourselves in for and thought only that it might be a good thing to attract younger people to the village.</p> <p>More young people could be an asset but I do not believe that young people in the income bracket that requires them to look for so-called “affordable” housing will be attracted to Staunton unless the infrastructure is assured, and I think that we all realise that it will not be! It might be possible however, to attract young people in higher income brackets, those that might work from home or perhaps prepared to commute longer distances. This suggests something rather different than the sort of development envisaged, but the proximity of the digester unit and the consequential traffic is likely to detract.</p> <p>Let us therefore consider the demographics: an ageing population, hence the wish to attract young families which, at the risk of repeating myself, is impracticable due to the lack of infrastructure. This ageing population however, will eventually need support and appropriate accommodation i.e. no stairs,</p>	<p>requirements for smaller accommodation, self-build and live/work. It will help bolster existing services, improve facilities and infrastructure and meet community needs. The housing requirement in the Local Plan Core Strategy is a minimum, not a quota or target.</p> <p>NDP para. 4.10 recognises the need to consider housing for older people as an aspect of community requirements.</p>	

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Titley Group draft NDP
			<p>wide doorways that might accommodate a wheelchair, ramps, built-in emergency call system etc. Two-bedroom, two-bathroom single-storey dwellings with these facilities would enable older people to remain in a home of their own. The thought of residential/care home, abandoning possessions of sentimental value, is anathema to the elderly. Providing this type of accommodation would be a far greater service to the community than development that has been envisaged and might have more support.</p> <p>Para. 6.11.3 what market research has been carried out?</p>		
	Para. 6.13	C	"The Cottage" is also listed.	Historic England's online records only show the three listed buildings referred to in NDP para. 6.13.	No change.
	Policy TG10	C	"Appropriate" is the key word – avoid things like car repairs.	Noted.	No change.
	Policy TG13	C	I would hope that this means improvement to infrastructure before <u>any</u> development allowed!	Noted.	No change.

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Titley Group draft NDP
	Para. 8.1	C	The slurry reservoir needs to be covered to avoid further harm to children.	The digestate storage tank is located 350m east of the village. It is a permitted development on private land with no adjacent public right of way to which regard has been had in developing the proposal.	No change.
	Policy TG14 5) and para. 8.11.	C	Absolutely no consideration has been given to this in the past – the impact on the prevailing landscape of development in recent years is appalling and should never have been allowed.	Noted. Policy TG14 will give a more local focus when assessing the impact of proposed developments on the landscape.	No change.

Table A4.3: Community and other comments: Titley

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Titley Group draft NDP
Anthony Evan Adlard	Para. 2.13	C	Last word on line 4 should be “Scientific” and not “Interest”.	This is agreed.	Correct typo. as indicated.
	Policy TG6, Plan 4	C	As drawn, the settlement boundary <u>excludes</u> the garden of OLD PRIORY. This is the white area with PW in it. It is considered that this area should be <u>within</u> the settlement area.	The settlement boundary has been appropriately drawn to follow the rear boundary of the churchyard. Inclusion of the area referred to could result in infill development, harmful to the setting of the nearby designated heritage assets (the Church and the Old Priory, grade II listed).	No change.
	NDP	C	Full marks to the group who produced this document. Very clear and easy to read which reflects the research and hard work that went into its production. Thank you.	Noted.	No change.

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Titley Group draft NDP
Fiona Brazier	Policy TG6, Plan 4	O	Objecting to the inclusion of the small field to the south of Half Barrel Cottage near Rhiwlas Cottages.	The settlement boundary in this location has been re-considered in the light of this and other objections. A revision is to be made to exclude the identified area of pasture, together with a modern agricultural building to the east, to better reflect the historic form of the settlement. This change will also support the concern to avoid development on Eywood Lane which may intensify use of the junction with the B4355, having regard to highway safety (NDP para. 5.16 refers).	Amend Titley settlement boundary (Plan 4) to exclude the identified area south of Half Barrel Cottage together with the agricultural building to east.
	NDP	S	I support the Neighbourhood Development Plan for Titley and Staunton-on-Arrow area.	Noted.	No change.

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Titley Group draft NDP
Paul Cain	Policy TG2 2), Policy TG4, para. 5.5	O	With the current barns development a further 6 houses would be too many. A probable consequence would be to make further development more likely. This “would not be in keeping with the open and dispersed character” (para. 5.5)	The settlement boundary has been drawn to control further development to the north-east and the NDP acknowledges the need for a planning obligation to be secured in respect of the recreational open space. This provision will safeguard the character of the settlement.	No change.
	Para. 3.6, 4.8 and 4.14	O	The barns at Titley Farm will I believe be for rent. This adds to the Rhiwlas group along with houses scattered about the village. The proposed sites at Titley Farm and Church wood may also be for rent. Reconsider sites for development where the landowner will build houses for sale as opposed to adding to the rental stock.	National planning policy supports meeting the needs of different groups in the community, including those of people wishing to rent their own homes. The Local Plan Core Strategy also aims to meet the housing needs of all sections of the	No change.

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Titley Group draft NDP
				community, and this is reflected in policy TG4 at criterion 2. This is an appropriate approach which is in line with national and strategic policy.	
John Cromar	Para. 5.12	C	I can confirm the existence of a wood bank in Priory Wood on the western field boundary, indicating ancient origins for this woodland boundary.	Noted. The draft allocation of land for housing at Church Wood is to be deleted (see response to comment by Historic England above).	See change in response to comment by Historic England, above.
	Para. 7.8	C	What would new employment be? Standalone retail/industrial units? How do we square this with policy TG1 2)?	Examples of the type of economic development envisaged are given in the policy TG10 criteria and the supporting justification. Policy TG10 is consistent with TG1 2), providing further detail.	No change.

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Titley Group draft NDP
	NDP		Thanks to all involved!	Noted.	No change.
Joanna Davies	NDP	C	Not sure a children's play area in Titley is required (how many children are there?). Most if not all houses have good sized gardens. Traffic calming in my experience has the reverse effect! Farm traffic and lorries do go too fast on the B4355. Farm traffic is often so wide it takes up the whole width of a lane. Small vehicles is the only answer. We need to keep the Post Office in Kington or die! How about solar panels on the village halls?	The proposal for a play area (para. 5.3 (b)) is made as part of the allocation at Titley Farm and reflects comments made to the residents' survey. Traffic calming and speeds are not a matter for the NDP but are addressed in a Community Action (CA5). Post Office in Kington is outside the Neighbourhood Area. Solar panels on the village hall roof are not a matter for the NDP.	No change.
Christopher Goode	Para. 5.2	C	Access needs to be looked at – lowering speed restrictions – low cost housing <u>for sale</u> not rent. Pedestrian crossing? For child safety. Eco housing.	Traffic speeds are not a matter for the NDP but are addressed in a Community Action (CA5). Access	No change.

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Titley Group draft NDP
				including by foot will be addressed in scheme design pursuant to policy TG4 7) and para. 5.7.	
	NDP	C	Communities need permanent residents, as may be thus can be better achieved by housing for sale to encourage people to invest their life in the village. Eco housing means less cost for first-time buyers.	National planning policy supports meeting the needs of different groups in the community, including those of people wishing to rent their own homes. The Local Plan Core Strategy also aims to meet the housing needs of all sections of the community, and this is reflected in policy TG4 at criterion 2. This is an appropriate approach which is in line with national and strategic policy.	No change.

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Titley Group draft NDP
Toni Greatorex	NDP	S	TG4 and TG7 is this an adequate area for the proposed number of dwellings.	The area specified at policy TG4 is considered appropriate in this village context given that the intent is to deliver smaller accommodation to meet identified needs with the development sited to the rear of the site. A change is proposed to policy TG7 (see response to comments made by Martin Booty, Table 2).	Policy TG4: no change. Policy TG7: See change in response to comment by Martin Booty, Table 2.
Mr David Gundy	Policy TG6, para 5.15	O	Settlement boundary should include small triangle of land up Eywood Lane, between Cherry Tree Cottage and Half Barrel Cottage.	The settlement boundary as drawn appropriately reflects the built form of the settlement. The land referred to forms a break in development between Half Barrel Cottage and a modern property further to the west.	No change.

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Titley Group draft NDP
				This gap clearly signals the transition from village to countryside. It should continue to be excluded from the settlement boundary. In addition, the Parish Council is concerned to avoid enabling development on Eywood Lane which may intensify use of the junction with the B4355, having regard to highway safety (NDP para. 5.16 refers).	
	Para. 5.16	C	Where B4355 and Eywood Lane meet, they are either fit 'for purpose or not fit for purpose!	The visibility which is available at the junction of Eywood Lane and the B4355 is sub-standard.	No change.
	NDP	C	I think the Titley Group Neighbourhood Development Plan have missed an opportunity in identifying a site of infill land which a	The land referred to has been excluded from the	No change.

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Titley Group draft NDP
			planning officer visit could not find any good reason for not been acceptable for the development of a new property.	settlement boundary for the reasons set out above.	
Shaun and Beccy Haydon	Policy TG6, Plan 4	S	Settlement boundary excluding Stagg Meadow acknowledges importance of green space in village centre.	Noted.	No change.
	Policy TG6, Plan 4	S	Settlement boundary excluding further development on Eywood Lane beyond already built dwellings (at 2018) acknowledges that area inappropriate for multi-level development and technical difficulties of sites in that area of green belt.	Noted.	No change.
	Policy TG5	S/C	Proximity of church makes this site sensitive so suggest further qualification of policy to direct any dwelling to rear of site in order to avoid interfering with view of church.	The draft allocation of land for housing at Church Wood is to be deleted (see response to comment by Historic England above).	See change in response to comment by Historic England, above.
	NDP		Very well prepared and researched, good work in documenting and reflecting community's views.	Noted.	No change.

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Titley Group draft NDP
John L. Jones	Policy TG6, plan 4	C	Re-drawing of settlement boundary at Rhiwlas Cottage to follow boundary of Half-Barrel Cottage to avoid future development there.	See response to comment by Fiona Brazier, above.	See change in response to comment by Fiona Brazier, above.
	Policy TG5	C	This is an historical site with the iconic view of St Peters and Priory Spring at the heart of the village which should not be compromised by 'inappropriate' building.	The draft allocation of land for housing at Church Wood is to be deleted (see response to comment by Historic England above).	See change in response to comment by Historic England, above.
	NDP	C	Overall this is an impressive document indicating a comprehensive and imaginative approach to development in Titley and Staunton. While welcoming the proposed developments of lower-cost housing and open space at Titley Farm TG4 and land opposite Old Court Cottage TG7 in Staunton, we should be aware that so much of this is down to trust in the landowners and developers.	Noted.	No change.
Ann Mayo	Para. 3.7, bullet point 2.	C	Electronic communications need to be improved in Titley. They are as essential as electricity and water in this modern world. Rural areas are missing out.	Noted. Policy TG11 also supports the provision of suitably-designed	No change.

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Titley Group draft NDP
				communications and broadband infrastructure.	
	Policy TG4	S	The proposed development at Titley Farm is very suitable for the area and I am pleased it includes open/play areas.	Noted.	No change.
	Policy TG5	S	The proposed development at Church Wood could enhance the village if it is done sensitively, observing the points on p.20, para. 5.14 and policy TG5.	The draft allocation of land for housing at Church Wood is to be deleted (see response to comment by Historic England above).	See change in response to comment by Historic England, above.
	Policy TG5 4)	S	A wider pavement is long overdue!		
	Policy TG6, Plan 4		I am pleased to see that Stagg Meadow is not in the settlement plan.	Noted.	No change.
	NDP	C	A very well constructed document. Thank you for all involved for their hard work.	Noted.	No change.
Doe Middleton	Policy TG5	C	This is an iconic site and should not be compromised by building.	The draft allocation of land for housing at Church Wood is to be deleted (see	See change in response to comment by Historic England, above.

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Titley Group draft NDP
				response to comment by Historic England above).	
	Policy TG6, Plan 4	C	Boundary at Rhiwlas Cottage should follow boundary of Half Barrel Cottage to avoid development.	See response to comment by Fiona Brazier, above.	See change in response to comment by Fiona Brazier, above.
	NDP	C	A very impressive document. If more houses are needed they should reflect the needs of the village. Low cost houses and perhaps some for the elderly. We need re-assurance that Stagg Meadow will be protected.	NDP policies support new housing which can be shown to be of a size and type to meet local requirements. Stagg Meadow is outside the Titley settlement boundary and so is defined as countryside in planning terms.	No change.
Stephen and Nicola Reynolds	Policy TG5	O	Proposed building area is too close to church which already has buildings close to its far side. Site is very important historically – pre-1066 Priory and the burial place of a founder of modern Hungary. Having met ambassadors on several occasions – site is very important to them and these houses will ruin setting of the	The draft allocation of land for housing at Church Wood is to be deleted (see response to comment by Historic England above).	See change in response to comment by Historic England, above.

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Titley Group draft NDP
			church within the beautiful, historic landscape. Concern over water supply also.		
	NDP	C	Thank you for all the work done in producing this plan. A very professional job!	Noted.	No change.
TT Planning	Chapter 5 – omission site	O	See Appendix A.		
Mrs Angela Vaughan	Para. 5.16	O	See Appendix B.		
Mrs Joanna Whitlock	Policy TG6, Plan 4	O	I object to the line of the settlement boundary and feel it should not include the small paddock by Rhiwlas Cottage in front of my home and the modern metal barn, erected for agricultural purposes. There is an old (1826) ha ha that forms the boundary between my garden and the paddock and I believe the boundary for settlement should follow this ha ha. My concerns are that this concrete and metal barn will be	See response to comment by Fiona Brazier, above.	See change in response to comment by Fiona Brazier, above.

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to Titley Group draft NDP
			converted to a dwelling in the future, using the paddock as a garden.		
	NDP	C	Generally I applaud all the hard work and dedication of the team who have put together this Development Plan. Thank you.	Noted.	No change.

Appendix A: Comment from TT Planning

Comment received

Please accept this letter as a response to the Regulation 14 public consultation associated with the Titley Group Draft Neighbourhood Development Plan (NDP). 'Tompkins Thomas Planning' acts for a party interested in bringing forward land referred to in the Housing Site Assessment 2018, as **Site 4 - Land west of the Stagg Inn**. In **summary, the purpose of the letter is to draw attention to the benefits that would derive from allocating this land for housing in the NDP and how development here would contribute to fulfilment of the Draft NDP's stated Vision and Objectives and the attainment of sustainable development overall. We respectfully request that further consideration is given to the inclusion of Site 4 as an allocated housing site within the NDP.** The Housing Site Assessment dismissed the site because of concerns in respect of settlement pattern, scale of the development, loss of agricultural land and the formation of a new edge to the village. For the reasons described below, we respectfully disagree with the assessment's conclusion as to the scale of development and associated impact of development upon the character of the settlement and poor relationship to the prevailing linear settlement pattern. We consider that subject to a high-quality, architect-led approach, the site can deliver a scheme for approximately 10 dwellings that would accord fully with vast majority of the relevant draft policies of the NDP. We will now discuss, under topic headings, certain key issues underpinning our recommendation that the site be included as an allocation within the draft NDP.

The Neighbourhood Plan Vision

The Vision set out at section 3 of the draft NDP is encapsulated in the following four bullet points: -

- *A home for thriving and distinct local communities, where the needs of all ages (including those of the younger generation) for both housing and local employment can be met.*
- *A place where high-quality and sustainable community services, infrastructure and transport are available, with additional provision delivered by or in step with new development;*
- *A location which supports successful and environmentally-sustainable farming enterprises and other small businesses, providing local employment; &*
- *A sustainable rural environment where the character of the villages, the natural beauty of the landscape, wildlife and historic heritage are conserved and enhanced, providing an attractive and peaceful countryside for all to enjoy.*

We entirely support this vision for the future of the Neighbourhood Area but consider that delivery of this vision will be dependent to large extent on enough houses coming forward within the plan period to support the thriving communities and housing needs and to ensure a 'critical' mass of population whereby rural services e.g.

Comment received

enhanced public transport services, become sustainable. Moreover, we are of the belief that sensitive, well-conceived development of this site would contribute to, not detract from, the character of Titley, with no significant adverse effects on any notable features of the built and natural environments that the draft NDP seeks to protect.

The Neighbourhood Plan Objectives

The NDP objectives are arranged under the three sub-headings of 'Housing and settlements', 'Economic and social development' and 'Environment'. Under the '**Housing and settlements**' objectives there is recognition of the need to ensure that housing meets the identified need for smaller 2 and 3-bed market properties. The draft NDP includes Policy TG2, which refers to the need to demonstrate that housing proposals will meet the latest assessment of need in terms of type and tenure. We are broadly supportive of this approach. Paragraph 2.9 describes, however, the "preponderance of larger houses, with 34% of dwellings having four or more bedrooms in 2011, compared to 24.8% in Herefordshire." Whilst we recognise that the allocation policies require dwellings to meet the latest evidence of need, the limited scale of the allocations means that the underlying imbalance in the Neighbourhood Area is unlikely to be addressed to any significant degree over the plan period. Given the absence of affordable housing within the parish, it is of critical importance that if the communities within the Neighbourhood Area are to 'thrive', enough provision is made for smaller open market dwellings.

Under the '**Economic and social**' objectives support is expressed for rural diversification and work to "improve electronic communications, renewable energy *and* the retention of community facilities and new provision." We submit that the retention of community facilities, which is evidently of vital importance to the future vitality of the communities within the Neighbourhood Area, would be assisted considerably by ensuring that a positive and proactive approach is taken to allocating more land for housing. Particularly, land that as described above, has such excellent links to the village hall and Stagg Inn. We note that in support of the application to extend the village hall at Titley (Ref: 150863), the Parish Council commented: "*The village Hall is an integral part of village life and events held here have been highly successful in both bringing the community together and developing the hall itself as a business. Often a temporary structure has been used to increase the capacity of the hall in line with what is being proposed. The permanent extension will ensure the hall remains a success in the future.*" It is our view that the future sustainability of the village hall (as a business), Stagg Inn and church will be enhanced through the further allocation of sustainably located land for residential development; such as **Site 4 – Land to the west of the Stagg Inn.**

Under the '**Environment**' related objectives, the draft NDP seeks to ensure that the local environment is protected and enhanced by: -

- *Providing for the protection, enhancement and conservation of the natural and historic environments in accordance with Local Plan Core Strategy policies.*
- *Ensuring that new development is in keeping with its surroundings and appropriately designed and accessed.*

Comment received

- *Supporting high quality design solutions that make a positive contribution to local character and distinctiveness.*

Taking these in turn, it is our view that development of **Site 4 – Land to the west of the Stagg Inn** would have no detriment to the natural or historic environment or conflict with relevant CS policies, LD1-LD4 inclusive, nor draft NDP policies TG14-16 inclusive. The site is not subject to any environmental designations and nor are there any individual features of significance upon the field parcel itself. Subject to a high-quality design, such that the draft policies of the NDP rightly require, we submit that the development of this site would be in keeping with its surroundings and able to make a positive contribution to local character and distinctiveness. It would be the intention to bring forward an architect-led design that takes full account of and responds to the settlement pattern and character with individually designed, bespoke dwellings and appropriate hard and soft landscaping. It would also be the intention to ensure that the dwellings are capable of adaptation to meet the needs of live-work and/or elderly residents. On this basis and subject to an appropriate criteria-based allocation policy, we consider that development of **Site 4 – Land west of the Stagg Inn** would be in accordance with the NDP; the only conflict being the location outside, but adjacent to the draft Titley settlement boundary.

Housing land supply

We accept fully that the draft NDP allocates housing sites in both RA2 settlements; Titley and Staunton-on-Arrow. The NDP also acknowledges that Titley is the ‘upper tier’ settlement in that it is listed at figure 4.14 of the Herefordshire Local Plan – Core Strategy 2011-2031 (CS) and should, if conformity with the CS’s spatial strategy is to be ensured, be the main focus of proportionate growth. It is also the case that the proportionate housing growth target as defined by CS Policies RA1 and RA2 should be regarded as a ‘minimum’ and not a ceiling to sustainable development within villages, which as above, can contribute to securing several the objectives set out in the plan.

It is our view that even allowing for the allocations at Titley Farm and Church Wood, development of **Site 4 – Land west of the Stagg Inn** for approximately 10 dwellings would not be disproportionate in the local context.

Accessibility

We can confirm that subject to a detailed feasibility study, vehicular access would be taken from Green Lane. There is an existing field gate almost directly opposite the entrance into the village hall, whereas the other of the two identified village amenities, The Stagg Inn, is located directly opposite. In that respect, this site is very well-related spatially to what might be termed, except for the Church, the village’s focal point. Visibility at the junction of Green Lane and the B4355 is good in either direction.

Comment received

General comments

Land at Titley Farm

It is unclear from the evidence base available on the Parish Council website whether use of the existing farm track has been assessed for suitability. We make no pronouncement on this other than to note that highway verge notwithstanding, the B4355 bends quite sharply to the south-west. We presume Herefordshire Council will ask the Highway Authority to assess the means of vehicular and pedestrian access to all the proposed housing site allocations in due course, but this site is on the opposite side of the B4355 to the Village Hall and Stag Inn and does not, in our view, enjoy the spatial relationship with these village amenities that Site 4 does.

Land at Church Wood

The draft NDP notes the number of designated heritage assets in the vicinity of the site and concludes that development at Church Wood is within the setting of them all. We assume that Herefordshire Council will ask the Conservation Officer to assess the implication of development here relative to the designated heritage assets. Absent such assessment we'd be concerned that the draft NDP may not be able to show conformity with the basic conditions as per Paragraph 8 (2) b) of Schedule 4B of the Town & Country Planning Act 1990.

Conclusions

It is evident that significant endeavours have been undertaken in drafting the NDP. We endorse the Vision, Objectives and many of the draft policies. However, we'd strongly recommend that the Group Parish Council revisits the housing allocations. It is our belief that the Housing Site Assessment dismissed the merits of **Site 4 – Land west of the Stag Inn** too readily. We do not concur that development of the site would be unduly detrimental to the character of the village or its predominantly linear settlement pattern and nor do we consider the limited loss of agriculturally productive land to be enough to render the site unacceptable in terms of planning policy. Subject to appropriate landscaping (which would also act to enhance bio-diversity), we do not agree that forming a 'new edge to the village' in this location should be objectionable to the extent that allocation should be ruled out. By contrast, we consider that a well-conceived, high-quality architect-led proposal would be of significant benefit to Titley and the Neighbourhood Area more widely for the following reasons: -

- **It would help secure the draft NDP objective of supplying more smaller, market homes to assist young people who want to remain in the Neighbourhood Area and elderly residents wishing to downsize;**

Comment received

- **The site is very-well related spatially to the village hall and The Stag Inn. The village hall is something of an ‘outlier’ presently and developing Site 4 would help integrate it with the remainder of the village;**
- **It would deliver more resident population, which would benefit the vitality of the community and help sustain the existing community facilities as well as giving greater potential for the delivery of sustainable transport and communications infrastructure;**
- **For the reasons described above, there are potentially significant issues relating to accessibility and impact on designated heritage assets that may prejudice delivery of the allocations currently proposed.**

In our professional view, there is lots to commend the allocation of **Site 4** and we encourage the Group Parish Council to do so.

Response

In preparing the NDP, the Parish Council has carefully considered the respective merits of the various prospective housing sites that were submitted in response to the NDP Call for Sites held in 2017. To assist with this a Housing Site Assessment (HSA) has been undertaken. The aim has been to balance addressing housing needs with providing for the proper planning of the village by having regard to its prevailing settlement form and character. Table 1 of the draft NDP indicates that site allocations were not required to meet the minimum housing requirement of the Herefordshire Local Plan Core Strategy. Having demonstrably met these requirements there is no need for the NDP to allocate further land although the Parish Council has planned positively to do this.

In this process, Site 4 Land west of the Stag Inn has been considered and discounted. The Parish Council has further considered the points made in the representation and remains of the view that Site 4 should not be allocated for development. As well as the absence of any need to do so, such an allocation would lead to the unnecessary loss of agricultural land and the creation of a new edge to the village. There are also continuing concerns over the scale of development which may arise, considered against both proportionate housing requirements and the character of the settlement, and with the poor relationship to the prevailing linear settlement pattern.

Comment received

It is noted that site 4 was assessed in the HSA as having a capacity of 12 dwellings, which would have delivered four affordable dwellings. This was a potential advantage of the release which was taken into account in coming to the conclusion not to consider the site further. The representation now alludes to a scheme of ten dwellings which is below the threshold at which affordable units can be required, even though much attention is given by the representation to meeting housing needs.

No change.

Appendix B: Comment from Mrs Angela Vaughan

Comment received

I refer to your consultation draft issued December 2018. As the owner of Balance Farm I wish to object to the content of the document in so far as it affects Balance Farm.

In particular paragraph 5.16 specifically excludes land at Balance Farm that has been granted Outline Planning permission for 5 dwellings.

My reasons for objection are:

1. Herefordshire Councils guidance for the drawing of a settlement boundary advises that sites that have the benefit of planning permission should be included within that settlement boundary. The site at The Balance (former farmyard) has planning permission for housing development and as such should be included within the settlement boundary.
2. On 28 September 2018, Herefordshire Council refused an application for Approval of Reserved Matters, access only, for reasons unrelated to the terms of the conditions attached to the grant of Outline Planning Permission. Attached is a Barristers Opinion that concludes that the decision made by Herefordshire Council was erroneous in law. Herefordshire Council have acknowledged the validity of this opinion and the application has been re-submitted for determination. Therefore the reason for the Parish Council excluding this site from the settlement boundary is based on an incorrect assumption.
3. Herefordshire Council guidance with respect to the drawing of a settlement boundary also advises that buildings and associated land that make up the village form should also be included within the settlement boundary. Consequently the whole of the former farmyard should be included in the settlement boundary since it is previously developed land and immediately adjacent to existing housing development. If the Parish Council maintain their position that no new housing may be permitted if it involves more traffic onto the Eywood Lane/B4355 junction than no new development be it barn conversions or other forms of new housing that results in more vehicular movements may be permitted anywhere along Eywood Lane.

Will you please confirm receipt of my objections set out above and also confirm my objections will be taken account of when the Parish Council consider all the representations submitted in respect of this consultation draft.

[Counsel opinion attached to this comment is available from Parish Council clerk]

Response

Comment received

HC Neighbourhood Planning Guidance Note 20 on settlement boundaries refers to considering “commenced planning permissions, recent refusals, planning appeal decisions” in respect of areas on the edge of villages. The planning permission referred to for 5 dwellings has not been commenced. An adjacent application (LPA ref 162824) for the same number of dwellings was refused on appeal because it was found to cause significant harm to highway safety. The LPA has refused a reserved matters application (LPA ref 181476/RM) for access for the original scheme on highway grounds (a further application LPA ref 190122/RM awaits determination). The Parish Council has consistently highlighted the highway safety issues associated with the site. There are also concerns regarding its poor relationship with the overall linear character of the village. Land last occupied by agricultural buildings does not constitute previously developed land (National Planning Policy Framework, Annex 2 Glossary). The continued exclusion of the site from the settlement boundary is justified on these grounds.

No change, except to refer to the greenfield status of the land concerned at para. 5.16.

8) Reg. 14 Resubmission Procedure and Consultation

- 8.1) A public meeting was held in Titley Village Hall on 8th May 2022 from 1000-1200.
- 8.2) A total of 31 people attended the public consultation.
- 8.3) Copies of the NDP re-submission were available; also comment forms, and a display of maps and key elements of the plan on posters and pegboards.
- 8.4) Most of the visitors were already familiar with the key elements of the NDP, and were interested to understand the main additions in the re-submission, being the bolstering of the reasons for specifying the type and location of housing development, in particular the position of the settlement boundaries.
- 8.5) One point raised was the planning application for an additional site at Titley Farm barns; the landowner (David Forbes) has requested that the settlement boundary be altered to include this site. It was explained that changes such as this would adversely affect key elements of the NDP, and it was recommended that this application be followed up on vigorously with HC, particularly in view of the site already having Phosphate Credits to overcome the constraints on development in the River Lugg catchment.
- 8.6) The overall view of attendees regarding the re-submission was positive, with the hope and expectation that it will be endorsed and have some impact on future housing development in the Titley Group area, in particular as it is a reflection of what residents want.
- 8.7) The main written comment form received was regarding Policy TG6 (land opposite Old Court Cottage/Newton, Staunton-on-Arrow), delivered and discussed with Josh and Jo Burton, owners of the land at a Steering Group meeting on 18th October 2022.

Titley Group Parish
Neighbourhood Development Plan



Community Briefing of NDP Re-submission

Sun. 8th May 2022

Titley Village Hall, 3 till 5

Please drop in for informal discussions as we would like to offer an open session giving opportunity to understand and comment on changes applied to the Neighbourhood Development Plan before its re-submission.

See summary of key amendments overleaf.

Further info and full NDP document at:

<http://titleygroup-pc.gov.uk/>

TITLEY GROUP NEIGHBOURHOOD DEVELOPMENT PLAN 2011-2031

PRE-SUBMISSION CONSULTATION AND PUBLICITY NOTICE

In accordance with Regulation 14 of the Neighbourhood Planning (General) Regulations 2012, notice is given that a public consultation on the draft Titley Group Neighbourhood Development Plan will start at 9.00 a.m. on Monday 29th August 2022, for a period of six weeks, ending at 5.00 p.m. on Monday, 10th October 2022.

Where you can inspect the draft Neighbourhood Development Plan

The draft Neighbourhood Development Plan may also be inspected:

- On the Parish Council website at <https://titleygroup-pc.gov.uk/>
- On request from the Clerk to Titley Group Parish Council, by email to rachaeljones.titleygc@gmail.com
- At Titley Village Hall on Saturday 24th September 2022, 10am to 12pm

How to make comments on the draft Neighbourhood Development Plan

Comments must be made in writing and include the name and address of the person making the comments. Please make comments as specific as possible, quoting the relevant policy or paragraph number(s). All comments will be publicly available.

A comments form can be requested from the Clerk – rachaeljones.titleygc@gmail.com

Send us your comments:

- At the drop-in session at Titley Village Hall on Saturday 24th September 2022, 10am to 12pm
- By post to The Clerk, Titley Group Parish Council, c/o Flintsham Court, Titley, Kington, Herefordshire, HR5 3RG.
- By email to The Clerk : rachaeljones.titleygc@gmail.com

All comments must be received by 5.00 p.m. on Monday 10th October 2022. These will be considered by Titley Group Parish Council and will help shape the final Neighbourhood Development Plan

9) REG. 14 RE-CONSULTATION

9.1) A public Consultation on the revised NDP was held from Monday 29th^t August 2022 – Monday 10th October 2022

9.2) Consultation comments and the Steering Group's responses are detailed in Table 5 Below

Table 5

Statutory Consultee response	Comment	Change
<p>NATURAL ENGLAND The Neighbourhood Plan now includes policy TG14 Natural Environment, which states:</p> <p>All development proposals should demonstrate that they would not have an adverse effect on the River Wye Special Area of Conservation (SAC) and species of European Importance. Planning permission will only be granted if clear and convincing evidence is provided to show that the proposed development would not increase nutrient inputs to the SAC. This could included through the delivery of mitigation measures to make a proposal nutrient neutral. Reference should be made to Herefordshire Council's Phosphate Calculator and any other current associated guidance.</p> <p>With the inclusion of this policy and the updated Habitats Regulations Assessment, Natural England agrees that the plan will have no adverse effect on the integrity of the River Wye SAC.</p> <p>Natural England is generally supportive of the inclusion of this positively worded policy.</p>		No change
<p>NATIONAL GRID National Grid has no records of electricity or gas transmission assets in the Neighbourhood Area.</p>		No change
<p>DWR CYMRU/WELSH WATER Given that the NDP has been set out in accordance with Herefordshire Core Strategy, we are supportive of the aims, objectives and policies set out.</p> <p>With regard to policy TG4 – allocation at Titley Farm – there are no issues with provision of a clean water supply and there is a sufficient at our Titley Wastewater Treatment Works to accommodate the site. The WwTW does not have a phosphorus permit attached.</p>		No change

With regard to policy TG6 – land opposite Old Court Cottage – there is no public sewerage within Staunton on Arrow and as such private drainage will be required. There are no issues providing this site and the small sites identified under Policy TG7 with a clean water supply. In all three instances, a water main is available in the adjacent road.		
SPORT ENGLAND It is essential that the NDP reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to paras 96 and 97. It is also important to be aware of the presumption against loss of playing field land.	The scale of development provided for by the NDP does not allow for the provision of new sports facilities. The plan proposals would not entail the loss of any playing field land and will provide for new open and green spaces.	No change
HISTORIC ENGLAND Historic England is generally supportive of both the content of the document and the vision and objectives set out in it. The emphasis on conservation of local distinctiveness through good design and the protection of archaeological remains, historic farmsteads, landscape character and locally significant views is to be applauded.		No change
PUBLIC CONSULTATION COMMENTS		
Will Burton Fully Support the NDP. Some young families in the village would add a lot to the village.		
Mr and Mrs Anning We have no objections		
Robert Bennett Fully support the plan		
Anne Brisbane I am in support of smaller properties	The plan seeks to deliver smaller properties by allocating small sites and seeking higher densities.	No change
Claire Burton We need some younger families in the village	The plan seeks to provide new homes to accommodate families.	
Julia Johnstone All new housing should have adequate parking and renewable energy	The NDP allocations allow for provision of parking spaces and policy TG11 seeks the use of renewable energy provision on all new development.	No change
Stephen May	The NDP will only be able to deliver affordable housing if Titley and Staunton on Arrow	No change

<p>Staunton on Arrow would benefit from more affordable houses to encourage younger families into the village. The creation of a village green would be of benefit.</p>	<p>receive new designations as rural areas. This would enable the planning authority to require the provision of affordable housing contributions for developments of five or more dwellings or more than 500 sq m, in accordance with policy TG2.</p>	
<p>Mary May Staunton on Arrow needs a village green and more smaller , affordable house to encourage families and younger people to live there.</p>	<p>Policy TG6 includes provision for 75% of the site to be provided as Green Space. The NDP cannot require that the site is offered as a village green and no other suitable sites have been put forward for this purpose. As above, policy TG2 seeks to deliver some affordable housing if the rural settlement designation is made.</p>	<p>No change (although changes to policy in light of discussions with landowner as described below)</p>
<p>Josh Burton (owner of TG6 site) TG7 Good site but would not choose slate roof as expensive and poor heat retainer. TG2 (6) 35% affordable housing is not in keeping with current village occupation. We need to create jobs before housing population in the area. TG11 Need to speak to National Grid as network here is saturated. TG3 Can the evidence for local affordable housing requirements be shown TG10 – The electricity network must be upgraded to support development. NDP should be geared to encourage investment in the local area as well as housing.</p> <p>Mr Burton also raised a number of points about Policy TG6 at a meeting of the Steering Group on 18th October 2022. These related to the proposed layout of the site, the requirement to provide public open space and public car parking, to enter a s.106 or other agreement for the provision of such and the use of materials recommended by the policy.</p>	<p>Policy TG7 provides for the use of sympathetic alternative materials where this can be justified. External building materials do not normally provide insulation TG2/TG3 Affordable housing needs are identified in the Local Housing Market Assessment (see paragraph 4.19). Consultation responses have indicate support for the provision of affordable housing. National Grid did not raise any concerns about the capacity of the electricity network. Policy TG9 makes provision for economic development in the neighbourhood area in line with the Herefordshire Core Strategy.</p> <p>At meeting on 18th October, the following amendments to the NDP were agreed:</p>	<p>At meeting on 18th October, the following amendments to the NDP were agreed:</p> <p>Para.1, 3, 6 – change description to ‘green space...’ Para.1 – omit ‘...to include public car parking...’ Para 7 and 9 – omit</p>

HEREFORDSHIRE COUNCIL – DEVELOPMENT MANAGEMENT		
Policy TG1 - Net gains biodiversity – is this same metric as expected nationally? How will that be measured in advance of requirement for net gain coming in	This is a matter for the decision-maker based on the evidence provided by the applicant. The BNG metric tool is available and may be used to calculate BNG.	No change
<p>Policy TG2</p> <p>Point 6 – Seeks to impose a lower threshold for affordable housing. Does not align with NPPF or CS.</p> <p>Seeking to use NPPF para 64, but this lower threshold only applies in designated areas - National Parks, Areas of Outstanding Natural Beauty and areas designated as ‘rural’ under Section 157 of the Housing Act 1985.</p> <p>Policy not in accord with local or national policy</p>	<p>Policy amended to say it will apply if HC receives a positive response to its application for designated rural areas.</p> <p>If not, national policy will apply. Titley is a designated rural area under Statutory Instrument 1997 No. 620 and in accordance with the old PPS3. The designation post-dated the 1985 Act, which requires only that the area has been designated by order of the SoS. The Order was made by the Secretary of State for the Environment.</p>	Policy amended as described
Policy TG3. Rural exception housing policy generally reiterates H2. Perhaps needs more supporting text to qualify how ‘proven local need’ will be assessed. This policy does not add anything that is not already set out in H2. The only difference is that it seeks proposals “to be agreed with Parish Council’. This is not appropriate. Consultation with the PC should be encouraged, but ultimately the PC are not the decision making body.	<p>Local needs have been established by housing needs surveys.</p> <p>This policy previously passed examination. The examiner said:</p> <p>“The policy is clearly worded, has regard to the NPPF, is in general conformity with the CS and in particular CS Policies SS2, RA3 and H2 and helps to achieve sustainable development. It meets the basic conditions. No</p>	No change

	modifications are recommended.”	
<p>Policy TG4 - Effectively an allocation policy for 6 units</p> <p>Only 0.175ha of the site will be assigned for housing. This leads to a density equivalent to of ~35 units per hectare. This is much higher than the rest of the village and particularly at odds with the site’s immediate setting; which is low density and has very open feel.</p> <p>The policy sets out very prescriptive requirements – some of which contradict with each other. For instance, orientation to street scene vs solar gain.</p> <p>Considered it would be difficult to achieve an acceptable form of development within the parameters set by the policy.</p>	<p>The description of the proposed development has been changed to a “mixed use scheme” to reflect the fact that the whole site will not be used for housing.</p> <p>The design requirements were not raised as a concern during the previous examination.</p> <p>The matter of solar gain is addressed in criterion. 8 and is to be considered at the design stage. The policy makes clear that the orientation of the dwellings is preferred - not prescribed.</p>	Description of proposal changed to “mixed use scheme”
<p>TG5 Balance Farm omitted – should be included. Well known issue.</p> <p>If Balance Farm outline lapsed and by not including it within boundary there will be no presumption to grant permission again, site will need to be considered on its merits.</p> <p>Issues such as highways safety would need to be considered for instance and if not achievable then being within boundary wouldn’t mean that permission will necessarily be granted.</p> <p>Unclear why there is a very narrow 40m separation between the boundaries to the north-east and south-west parts of the village. Does this frontage gap have particular value? If not, it would appear as a logical infill plot.</p> <p>The strategy counts sites ‘held with phosphate’ towards its housing numbers, but is advocating a settlement boundary which would mean the principle of development on these sites would no longer be acceptable if NDP adopted. Eg. 193183 at Titley Court would be outside the boundary if plan adopted and</p>	<p>The NDP has been revised to explain why the Balance Farm site has been excluded.</p> <p>Consideration was given to including 193183 and the converted barns at Titley Court within the settlement boundary, but this would have entailed incorporation of areas unsuitable for development including a historic walled garden.</p> <p>The issue of the gap between the boundaries to the NE and SW was not raised at examination. Although the line of the settlement boundaries is only c.40m apart, the distance between developed land is much greater due to the area of open green space.</p> <p>The plan explains that the windfall allowance is based on historic figures, which relied on significant numbers of barn conversions. There are still several barns within the</p>	No change

<p>therefore refused. If the parish seek to rely on these sites to meet needs and find them acceptable, then they should be included within the boundary.</p> <p>It would be logical to include the barn conversions at Titley Court and 193183 within the settlement boundary, given they are contiguous with the allocated site?</p> <p>Boundary is generally quite tightly drawn. Would question whether a windfall allowance is achievable given limited opportunities for infilling.</p> <p>Policy needs to include clause along lines of 'outside of these boundaries, new housing will be limited and only be supported in accord with RA3'</p> <p>The policy seeks to ensure external walls are stone/timber/slate (point 9.) Has justification been shown for this? These materials do not particular define Titley. There is a large variety in the palate of materials seen throughout the village.</p>	<p>neighbourhood area that are likely to be suitable for conversion into dwellings.</p> <p>Paragraph 5.19 refers to policy RA3. This approach was acceptable to the examiner at the previous examination.</p> <p>The view of the NDP steering group is that the preferred materials reflect the local vernacular. The policy allows for alternatives where these can be justified.</p> <p>Local Vernacular is described in the Government's National Design Guide as:</p> <p>"An indigenous building style using local materials and traditional methods of construction and ornament..."</p>	
<p>Policy TG6 This is an aspirational policy which may prove difficult to deliver.</p> <p>To place a policy requirement on a scheme for 5 units to provide a large area of community open space and village car park is quite onerous.</p> <p>Setting the threshold that only 25% of the site can be used for dwellings, gardens, garages, parking and access arrangements is very prescriptive and it will likely be difficult to produce a scheme that meets other design requirements whilst keeping to these parameters.</p> <p>The requirement to position dwellings to the rear of the site would be at odds with the prevailing pattern of development, which is wayside.</p> <p>Has the requirement for materials to be stone/timber/slate got justification</p>	<p>No concerns were raised about the proposals at examination.</p> <p>The Examiner said:</p> <p>"the policy clearly sets out the expectations and requirements for the development of this site in a manner acceptable to the community."</p> <p><u>Preference for stone/timber/slate:</u></p> <p>See response to TG5 above</p>	<p>No change</p>

<p>Policy TG7 - What is meant by ‘sympathetically-designed individual dwellings’?</p> <p>Does this mean each site is effectively ‘allocated’ for a single dwelling each, or could the sites support more than one dwelling – provided they are individually designed?</p> <p>Would suggest the intended quantum of development on each site needs to be clarified (if applicable) and the wording of the policy tightened up.</p> <p>Again requirement for materials to be stone/timber/slate. Has justification been shown for this?</p>	<p>Policy amended to permit “small scale housing.”</p> <p>The design requirement accords with NPPF paragraph 130 (c):</p> <p>“Planning policies and decisions should ensure that developments:</p> <p>(c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);”</p> <p>See also National Design Guide, referenced above.</p> <p>The policy aims to ensure that new developments do not rely on generic building plans and reflect the variations in design of dwellings in the neighbourhood area, which is an important component of character.</p> <p>As explained with reference to TG5 above, the policy explains that stone, timber and slate roofs are part of the local vernacular and that alternatives may be used where this can be justified.</p>	<p>Policy amended to permit “small scale housing”</p>
<p>Policy TG8 - Unsure of justification for small break in settlement boundary splitting village into two parts? Is the gap is particularly important to the character of the village?</p> <p>Policy needs to include clause along lines of ‘outside of these boundaries, new housing will be limited and only be supported in accord with RA3’</p>	<p>The break in the settlement boundary was not raised as a concern at examination.</p> <p>6.16 refers to policy RA3.</p>	<p>No change</p>

<p>Again requirement for materials to be stone/timber/slate. Has justification been shown for this?</p>		
<p>Policy TG13 -</p> <p>Does this need more clarity on important views? Can these be defined better?</p>	<p>The neighbourhood area was proposed for designation as AONB and is a valued landscape containing wide views from all aspects, including national trails. It was felt that the policy would be weakened by identifying specific views.</p>	<p>No change</p>
<p>Policy TG14 - Point 5 – is this effectively a neutrality clause?</p> <p>Is that appropriate or informed by current SAC issues? Maybe overreaching?</p>	<p>The criteria accords with the precautionary requirements of the Conservation of Habitats and Species Regulations 2017. Natural England has approved it in its response dated 30/9/22, which said:</p> <p><i>“With the inclusion of this policy (TG14) and the updated Habitat Regulations Assessment, Natural England agrees that the plan will have no adverse effect on the integrity of the River Wye SAC.”</i></p> <p>The Environment Agency in its response dated 28/9/22, also supported the policy, saying:</p> <p><i>“It is noted, and welcomed, that the NDP includes a specific Policy section on the River Wye Special Area of Conservation and that Policy TG14 – part 5 now makes specific reference to impacts on the Catchment, including the need for nutrient neutrality and mitigation measures to secure such. It also references the Phosphate Budget Calculator Tool which is an important tool with regards to the Nutrient Neutrality issues within the Catchment.</i></p>	<p>No change</p>

	<i>In consideration of the above Herefordshire Council should be satisfied, in consultation with NE, as the primary consultation body on this matter, that this approach, including possible mitigation, is a viable and deliverable and that there is a reasonable degree of certainty provided to take forward the sites in the plan."</i>	
Policy TG15 - Suggest this include an NPPF style – harm not permitted, unless demonstrably outweighed by the public benefits of the scheme.	Added criterion 4 - Development proposals that would result in any harm to a listed building or its setting will be refused unless the benefits of the scheme demonstrably outweigh the identified harm.	Amended as described
Suggestion - Has it been considered whether Stag Meadow could be allocated local green space	Yes. It was not included at the wish of the owner.	No change
TRANSPORTION AND HIGHWAYS		
Policy TG4 Criteria 5 needs to meet HC design guidance	Added	Added requirement to meet design guidance
Para 5.13 An assessment of this junction should be provided with development which impacts the junction	Decision stage requirement	No change
Para 6.3 Any proposal should assess this access and the implications on the highway	Decision stage requirement	No change
Para 6.4 Connection to the national cycle network should be assessed. Cycle storage should be included	Decision stage requirement	No change
Para 6.7 Any access will need to be assessed to the appropriate guidance and the existing field access may not result in appropriate access for the development	Decision stage requirement	No change
Para 6.11 This will need to be assess with any development. The removal of hedgerows at appropriate stages can help with traffic calming and reduction.	Decision stage requirement	No change

Policy TG6, Criteria 8 - Will need to be assessed with any development. The removal of hedgerows at appropriate stages can help with traffic calming and reduction of speed	Addressed in Criteria 7: Hedgerow retained “subject only to highway requirements”.	No change
Para 7.10 Parish should make sure any speed limit requests are sent to Balfour Beatty	Any change in speed limits would be subject to Traffic Regulation Order and would require public and statutory consultation	No change
	The points raised in this consultation response relate to parts of the NDP that have not been amended since the previous examination and were not raised by the examiner as requiring review or alteration.	
<ul style="list-style-type: none"> Environmental Health (Environmental Protection – contaminated land) 		
Policy TG4 – agricultural practices such as uncontrolled burial of wastes or excessive pesticide or herbicide application may be thought of as potential contaminative and any development should consider this.	To be addressed at decision-making stage	No change
Policy TG6 - Agricultural spraying practices may lead to a legacy of contamination and any development should consider this	To be addressed at decision-making stage	No change
Policy TG7 (Jacobs Oak) - proposed development is adjacent to a former saw mill (south of the site) It is possible that unforeseen contamination may be present. Consideration should be given to the possibility of encountering contamination as a result of its former use and specialist advice be sought should any be encountered during the development.	To be addressed at decision-making stage	No change

Appendix 7

Titlely Group Neighbourhood Development Plan Regulation 14 Consultees

National organisations	
Environment Agency	graeme.irwin@environment-agency.gov.uk and SHWGPlanning@environment-agency.gov.uk
Natural Resources Wales	enquiries@naturalresourceswales.gov.uk
Natural England	consultations@naturalengland.org.uk
Historic England	west.midlands@HistoricEngland.org.uk
Coal Authority	planningconsultation@coal.gov.uk
Homes and Communities Agency	mail@homesandcommunities.co.uk
English Heritage	customers@english-heritage.org.uk
National Trust	mi.customerenquiries@nationaltrust.org.uk
Forestry Commission England	nationalenquiries@forestrycommission.gov.uk
Highways England	info@highwaysengland.co.uk
Wye Valley NHS Trust	john.burnett@wvt.nhs.uk
National Grid	nationalgrid.uk@avisionyoung.com n.grid@amecfw.com box.landandacquisitions@nationalgrid.com
RWE Npower Renewables Ltd.	jeremy.smith@rwe.com
Western Power Distribution	awilkes@westempower.co.uk
Dwr Cymru Welsh Water	forward.plans@dwrcymru.com
Local organisations	
Herefordshire Council, Neighbourhood Planning Team	neighbourhoodplanning@herefordshire.gov.uk
Cllr R. Phillips, Herefordshire Council	rjphillips@herefordshire.gov.uk
CPRE Herefordshire	admin@cpreherefordshire.org.uk
Hereford and Worcester Chamber of Commerce	goodbusiness@hwchamber.co.uk
Woodland Trust	justinmilward@woodland-trust.org.uk
Herefordshire Wildlife Trust	enquiries@herefordshirewt.co.uk

Adjoining county and community councils (Wales) and parish councils (England)	
Powys CC	customer@powys.gov.uk
Old Radnor Community Council	oldradnor.clerk@gmail.com
Presteigne and Norton Town Council	pntc@hotmail.com
Kington Rural and Lower Harpton Group Parish Council (Kington Rural CP and Lower Harpton CP)	er@estherolls.wyenet.co.uk
Lyonshall Parish Council	lyonshallparishclerk@gmail.com
Pembridge Parish Council	clerk@pembndqeparishcouncil.gov.uk
Stapleton Group Parish Council (Byton CP, Combe PC)	stapletongroupparishclerk@gmail.com
Call for Sites respondents	
Mr. David Forbes	[REDACTED]
Mr. Leslie Preece	[REDACTED]
Mrs. Angela Vaughan c/o agent Mike Harries, John Amos & Co	[REDACTED]
Mr. Will Burton c/o agent Bill Stokes, William Stokes Consulting	[REDACTED]
Mr. Stephen May	[REDACTED]
Mr. Andrew Burton c/o agent Bill Stokes, William Stokes Consulting	[REDACTED]
Mr. Abson	[REDACTED]
Mr. Christopher Jones	[REDACTED]
Local businesses	
The Stag Inn	reservations@thestagg.co.uk
Richard Norman The Leen	[REDACTED]
Matt Lloyd Lloyd Engineering	[REDACTED]