

# **Woolhope Neighbourhood Development Plan Consultation Statement**

**Woolhope Parish Council**

With assistance from



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Map 1 Designated Woolhope Neighbourhood Plan Area ((Source: [https://www.herefordshire.gov.uk/downloads/file/10712/neighbourhood\\_area\\_boundary\\_map\\_july\\_2015](https://www.herefordshire.gov.uk/downloads/file/10712/neighbourhood_area_boundary_map_july_2015)))



## 1.0 Introduction and Background

1.1 This Consultation Statement has been prepared in accordance with the Neighbourhood Planning (General) Regulations 2012 (SI No. 637) Part 5 Paragraph 15 (2)<sup>1</sup> which defines a “consultation statement” as *a document which –*

*(a) contains details of the persons and bodies who were consulted about the proposed neighbourhood development plan;*

*(b) explains how they were consulted;*

*(c) summarises the main issues and concerns raised by the persons consulted; and*

*(d) describes how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan.*

This Consultation Statement sets out how these requirements have been met and how, particularly, the Parish Council has sought to engage with those who live, work and carry out business in the area.

1.2 The Woolhop Neighbourhood Development Plan (WNDP) has also been prepared by taking into account the advice provided in Paragraph: 107 (Reference ID: 41-107-20200925) of the National Planning Practice (NPPG).

1.3 The WNDP has been prepared in response to the Localism Act 2011, this gives parish councils and other relevant bodies, new powers to prepare statutory neighbourhood plans to help guide development in their local areas. These powers give local people the opportunity to shape new development, as planning applications are determined in accordance with national planning policy and the local development plan, and neighbourhood plans form part of this framework.

1.3 The Parish Council applied to Herefordshire Council (HC) for the parish area to be designated as a neighbourhood area on 14<sup>th</sup> July 2015. The application for designation was approved by HC on 28<sup>th</sup> August 2015<sup>2</sup>. The designated area is shown on Map 1 of this Statement.

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<sup>1</sup> <http://www.legislation.gov.uk/uksi/2012/637/contents/made>

<sup>2</sup> <https://www.herefordshire.gov.uk/directory-record/3123/woolhope-neighbourhood-development-plan>

- 1.4 All information about the WNDP at each stage has been provided on the Parish Council web site <https://woolhope-pc.gov.uk/> and on the HC neighbourhood plan page for Woolhope <https://www.herefordshire.gov.uk/directory-record/3123/woolhope-neighbourhood-development-plan>.
- 1.5 This Statement provides further information and evidence to demonstrate how the WNDP meets the Neighbourhood Planning Regulations and government guidance.

## 2.0 Pre-Regulation 14 Consultation

### Resident's Survey 2020

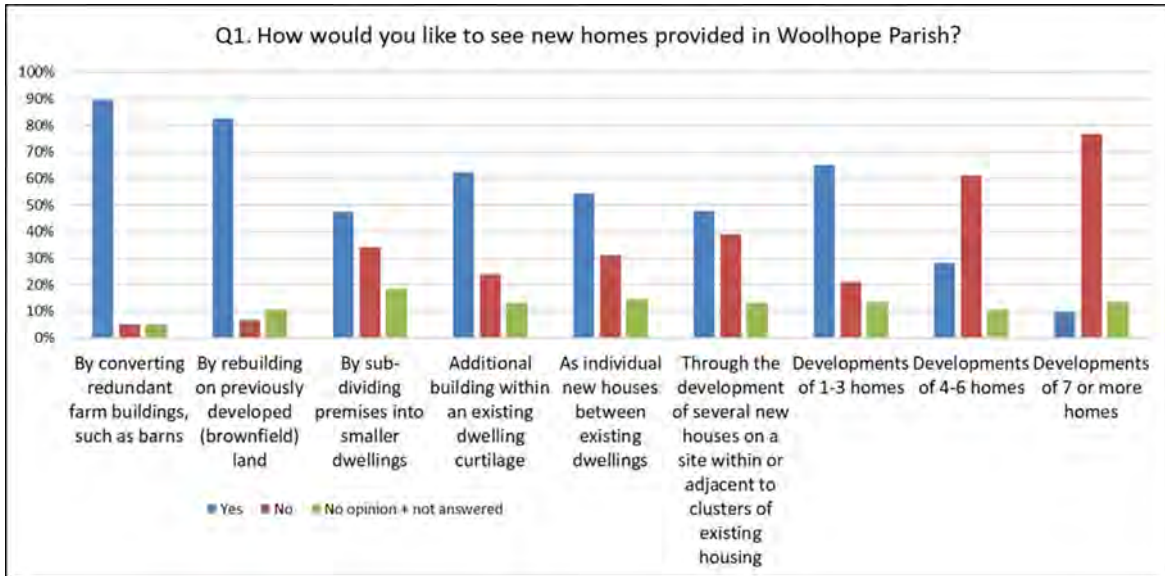
- 2.2 The Resident's Survey was conducted in the form of a questionnaire. Questionnaire forms were delivered to each household in the parish by volunteers and collected two weeks after the delivery date. Deliveries took place during October 2020. The last questionnaires were collected in March 2021. Extended timetables were in place to allow for Covid-19 restrictions and considerations. A copy of the questionnaire can be found in Appendix 1 of the WNDP.
- 2.3 From the 2021 Census, the total number of people aged 16 and over, usually resident in Woolhope Parish was 488. Based on the Census figure, responses have been received from 270 residents (55%) 16 years and over. This is an excellent response rate for surveys of this kind. The following is a summary of the Survey results.

### HOUSING

When considering how new homes should be provided in Woolhope Parish, there was strong support for:

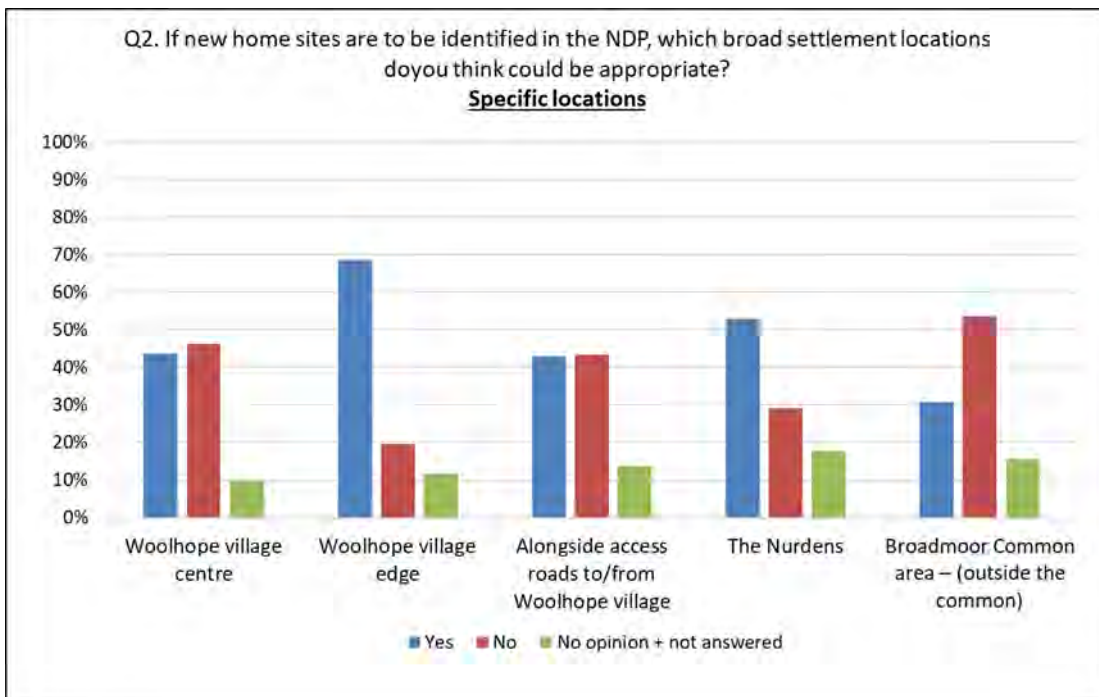
- converting redundant farm buildings, such as barns; and
- rebuilding on previously developed (brownfield) land.
- There was some support for single dwelling developments e.g. between existing buildings and within the curtilage of existing plots and some support for small 1-3 dwelling developments.
- There were strong negative views expressed on the development of sites over 4 dwellings, this negative reaction increased for development over 7 dwellings (Figure 1).

**Figure 1. How should new homes be provided in Woolhope Parish**



When looking at specific locations for new housing development ‘Woolhope village edge’ was the most popular option (69% of respondents). The second most popular response to this question was The Nurdens (53%) (Figure 2).

**Figure 2. Where should new housing be located?**



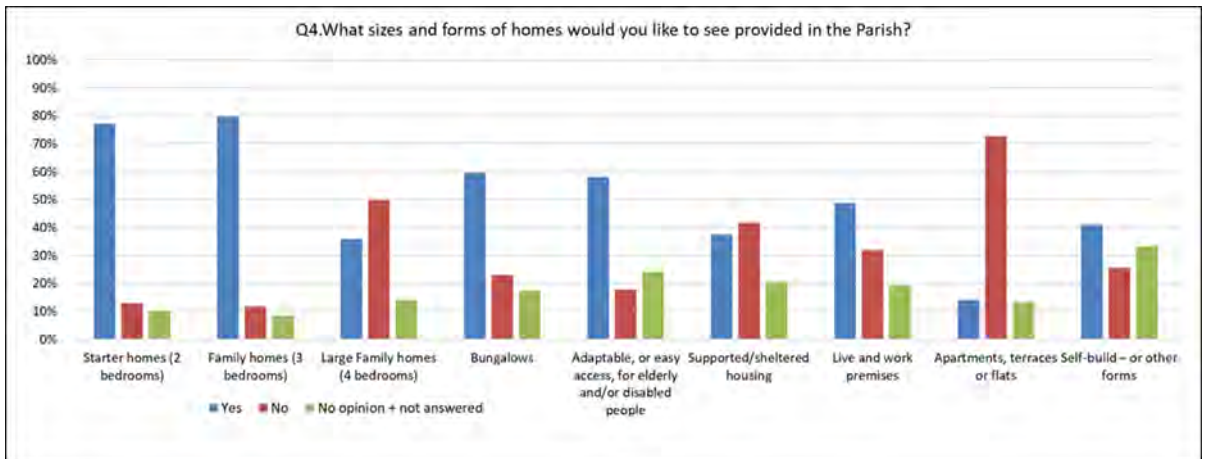
Perhaps, unsurprisingly, when residents were asked to express views on where potential new home sites could be identified strong support was expressed for locations:

- with least impact on the Parish’s landscape qualities (83%)
- with least impact on the Parish’s ecological and wildlife assets (84%)
- In locations with least impact on the Parish’s historic heritage values (81%)
- In locations with least impact on the amenities/uses of existing residential or other properties (71%)

Herefordshire Council planning policy (HLPCS Policy RA2) seeks to locate new housing development in or adjacent to a number of named settlements – one of which is Woolhope village. When asked where respondents would like to see new homes provided in Woolhope village, there was stronger support for ‘Developments within or adjacent to the village, but outside the Conservation Area’ (63%), than for ‘Small infill developments within the village and inside the Conservation Area’ (47%).

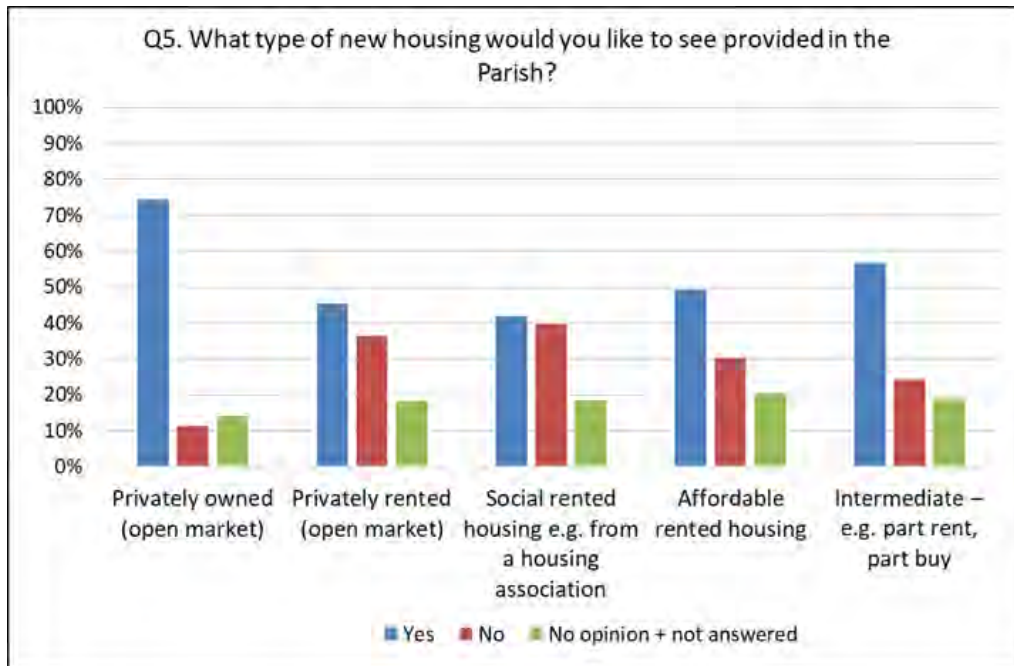
Turning to the mix of future homes there was strong support for starter and family homes (2 and 3 bedroomed houses), preferably privately owned purchased on the open market (74% with this option.). There was also support for bungalows (60%) and all new homes should be adaptable and accessible by all (Figure 3 and Figure 4).

**Figure 3. Type of new housing**





**Figure 4. Housing tenure**



Views were also canvassed on whether the development of a small site for rural exception housing a viable option was to help provide affordable housing, with or without the inclusion of a small number of houses for sale on the open market. There was no clear view on this option. There were slightly more in support of these schemes than against, but overall percentages were low, just over 40% in favour, with around 30% against and 20% no opinion.

In terms of the building of new homes, there was some support for all of the options around design of homes and choice of construction material, with the options in order of preference being as follows:

- To use sympathetic and sustainable materials
- To use high quality design
- To use vernacular and old styles to match the local environment
- Over 60% felt it was ‘Very important’ to build so they were “2050 ready” for a carbon neutral future. A further quarter gave it some importance. Less than 10% of respondents felt this had ‘little or no importance’.

### TRAFFIC, TRANSPORT AND ACCESS

Building more houses will create more traffic, with regard to this the most important issues to respondents were 'Road maintenance' and 'Road safety, for all users'.

Following that, over 80% of respondents felt the following three issues were 'Very important' and had 'Some importance':

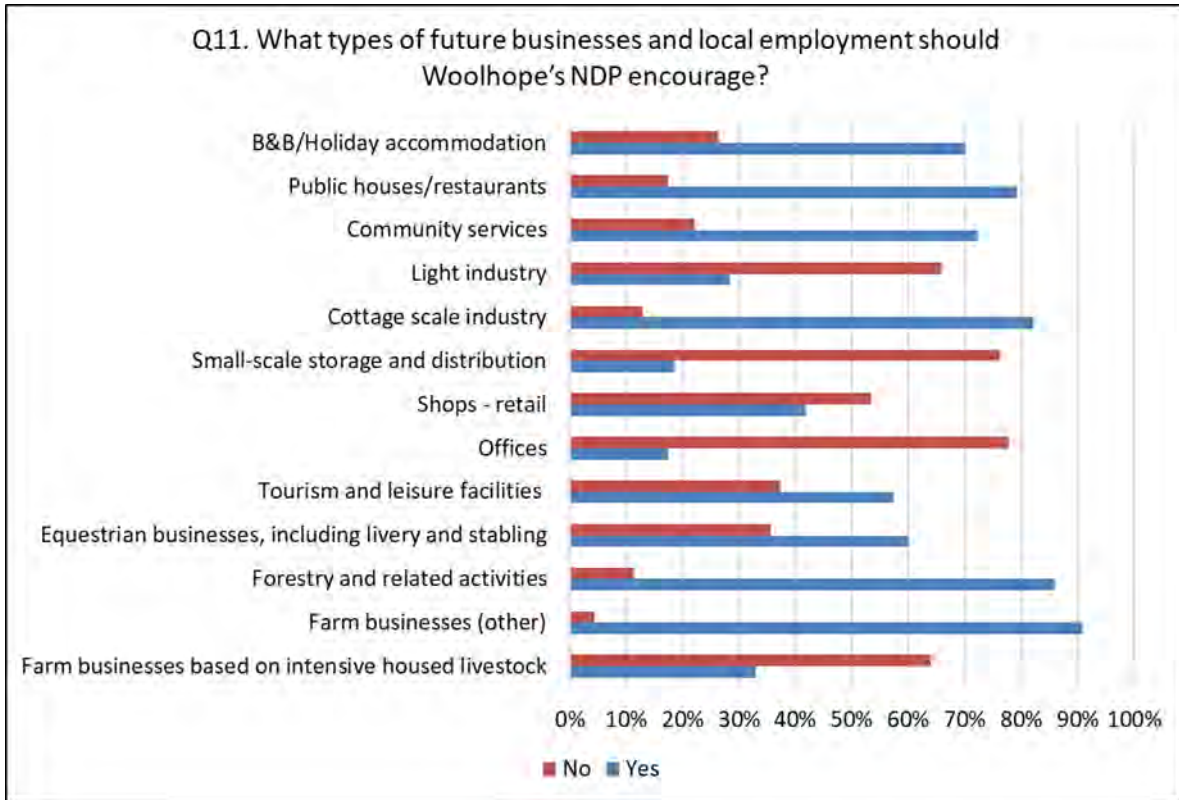
- Appropriate mandatory speed limits.
- Actions to 'calm' traffic.
- Providing a good bus service to the village.
- However, many of the comments that were given around this subject were concerns and opposition around extra lighting, speed bumps and extra signage. So although road safety was important, there was a strong difference of opinion on how this should be addressed. It should also be stressed at this point that some of the issues raised e.g. traffic speed are not issues that can be addressed through a planning document such as the WNDP.

### JOBS, THE ECONOMY AND TOURISM

In terms of the types of future businesses and local employment should the WNDP encourage (Figure 5), there was strong support for:

- Farm businesses (other)
- Forestry and related activities
- Cottage scale industry
- The following types of businesses which received some support were:
- Public houses/restaurants
- Community services
- B&B/Holiday accommodation
- Equestrian businesses, including livery and stabling
- Tourism and leisure facilities

**Figure 5. What types of business activity should the WNDP support?**



CONSERVING OUR LOCAL HERITAGE AND ENVIRONMENT

The Woolhope neighbourhood area has a wealth of natural and historic features – including part of the nationally designated Wye Valley Area of Outstanding Natural Beauty, part of the Broadmoor Common Local Nature Reserve, Sites of Special Scientific Interest, listed buildings and Woolhope Conservation Area.

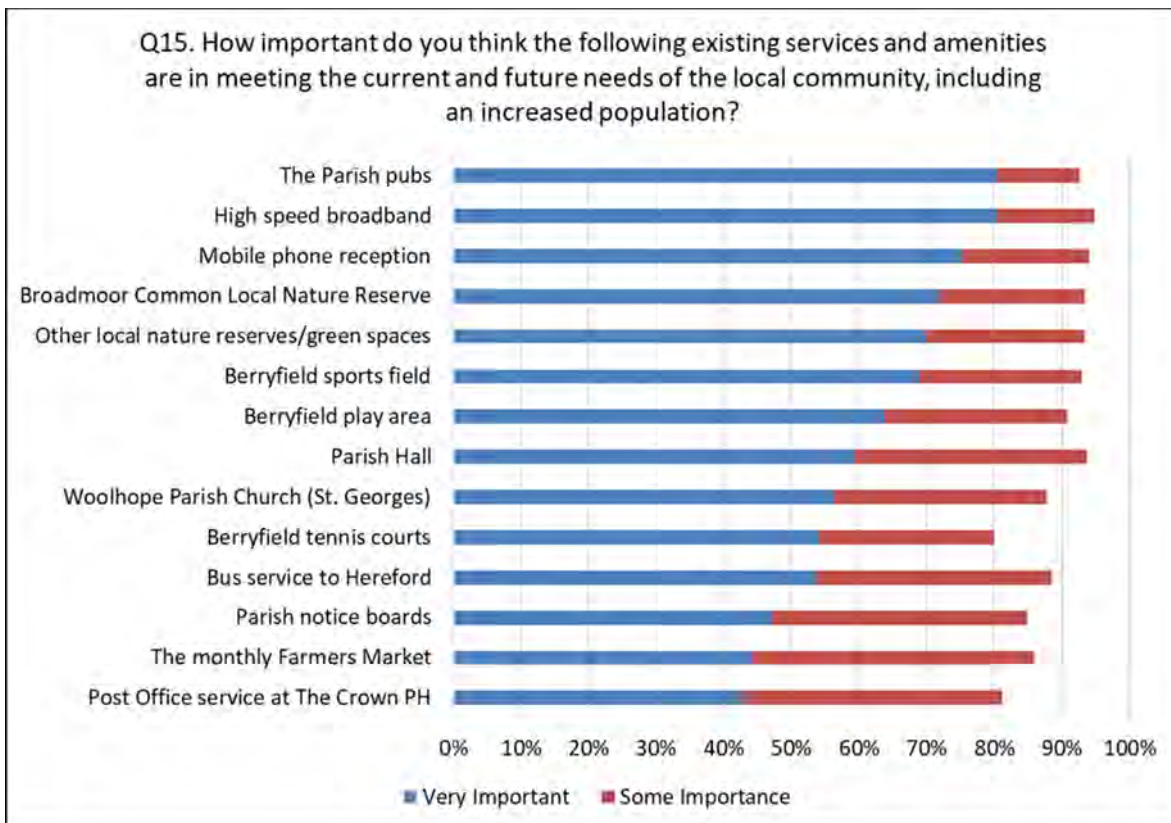
The Resident’s Survey recorded the following to be “very important”:

- Development to be in harmony with its surroundings, well-sited and landscaped to avoid visual intrusion (86%)
- Development to retain and improve landscape features (79%)
- Development to respect and protect historic and cultural heritage (81%)
- Development to minimise harm to ecology and wildlife (80%)
- Development to minimise noise and light pollution (84%)

IMPROVING COMMUNITY SERVICES AND INFRASTRUCTURE

The area’s existing services and amenities were felt to be important (both ‘Very important’ and ‘Some importance’) in meeting the current and future needs of the community (Figure 6).

**Figure 6. Community Facilities**



Respondents were asked if there were any other community facilities/services they would like to see provided/enhanced. There was strong support for:

- A facility for high-speed broadband for all Parishioners/businesses
- Improvement projects to enhance the Woolhope Dome landscape and ecology
- Community-owned and maintained green spaces for public enjoyment
- Community-run playgrounds and/or informal recreation/picnic areas
- A village grocery shop
- An upgraded sewage treatment plant/ sewer infrastructure

### WOOLHOPE IN 2031

This Survey included a free text comments box to gather views on how residents would like to see Woolhope in 2031 (the end date for the WNDP). Overall 47 comments were made.

The comments made covered a range of views, and included some opposing views, however the central themes that could be identified were:

- The village to retain its character as a village, with little change from where it is now
- Community facilities are thriving, valued and used
- Better and safer roads
- Continued and strengthened community spirit
- Protecting the forests and the environment, protecting the AONB and tackling the climate emergency

2.4 The Survey was used as the basis to develop the WNDP. It was used to develop the WNDP's Vision and identify the plan's 5 objectives. The Survey was also used to develop and help evidence the WNDP's policies.

#### **Keeping people informed**

2.5 As well as targeted survey work and engagement the Parish Council also kept people informed of progress on the WNDP through news updates on the web site (<https://woolhope-pc.gov.uk/ndp/>) and via email.

2.6 To complement the WNDP a Woolhope Design Code was produced this was consulted upon separately from the WNDP.

### **3.0 Regulation 14 Consultation 19th June 2023 until the 1<sup>st</sup> August 2023.**

3.1 The public consultation on the Regulation 14 Draft Woolhope Neighbourhood Development Plan was carried out in accordance with The Neighbourhood Planning (General) Regulations 2012 (SI No. 637) Part 5 Pre-submission consultation and publicity, paragraph 14. This states that:

*Before submitting a plan proposal to the local planning authority, a qualifying body must—*

*(a) publicise, in a manner that is likely to bring it to the attention of people who live, work or carry on business in the neighbourhood area:*

*(i) details of the proposals for a neighbourhood development plan;*

*(ii) details of where and when the proposals for a neighbourhood development plan may be inspected;*

*(iii) details of how to make representations; and*

*(iv) the date by which those representations must be received, being not less than 6 weeks from the date on which the draft proposal is first publicised;*

*(b) consult any consultation body referred to in paragraph 1 of Schedule 1 whose interests the qualifying body considers may be affected by the proposals for a neighbourhood development plan; and*

*(c) send a copy of the proposals for a neighbourhood development plan to the local planning authority.*

3.2 The Regulation 14 Draft WNDP was published for formal consultation from 19th June 2023 until the 1st August 2023.

3.3 Publicity of the WNDP was widespread. This included:

- Information on Parish noticeboards
- Flyers
- Social Media e.g. Twitter, Facebook (documents summarising the social media campaigns are available separately)
- Website <https://woolhope-pc.gov.uk/ndp/>
- Mailing list – businesses and formal consultees
- Media and press releases

3.4 Copies of the plan and supporting documents were made available on the Parish Council website <https://woolhope-pc.gov.uk/ndp/> and the Herefordshire Council WNDP web page <https://www.herefordshire.gov.uk/directory-record/3123/woolhope-neighbourhood-development-plan>

3.5 Hard copies of the plan were also made available for viewing on request.

3.6 Responses to the Regulation 14 consultation could be made in the following ways:

By post:

Nick Richmond (Clerk)

Unitas Villa

Camp Road

Ross-on-Wye

Herefordshire

HR9 5NJ

By email:

clerk@woolhope-pc.gov.uk

Or via the online response form at:

<https://woolhope-pc.gov.uk/ndp/>

3.7 All consultation materials included the date by which comments must be made and to whom.

3.8 A copy of the plan and supporting documentation was sent or made available to Herefordshire Council, Parish Councils and other bodies and agencies (Appendix 1).

3.9 A Strategic Environmental Assessment/Habitat Regulations Assessment screening was carried out on the Regulation 14 Draft of the WNDP. This was consulted on with the three statutory bodies. The screenings were also made available on the Herefordshire Woolhope neighbourhood plan web page.

3.10 A list of the consultation bodies' contact details was compiled and all those on the list were sent a letter by email or post notifying them of the Regulation 14 public consultation and inviting comments (Appendices 1 and 2). This list included:

- Individuals and businesses (including landowners and developers)
- Local groups and interest bodies
- Adjoining parishes.
- Environment Agency and other statutory bodies
- Local ward and county councillors
- Emails were also sent to local individuals and groups on the Parish Council mailing list.

3.11 Tables 1 of this Statement set out the responses received to the Regulation 14 Consultation. Tables 1 also include a column setting out the Parish Council's consideration of the response and the agreed action. These agreed actions were used to make amendments to the Regulation 14 Draft prior to submission. In this way, the WNDP has been a collaborative effort lead by the Neighbourhood Plan Committee, but supported by responses and feedback from local residents, business and others.



**Table 1. Woolhope Regulation 14 Consultation -Comments and Parish Council response**

Woolhope Neighbourhood Development Plan Consultation Statement, February 2024

Respondent	Comment	Suggested Response
Herefordshire Council	<p>Neighbourhood Planning</p> <p>The plan and design code are structured and written well, and the objectives and policies set out are clear. Overall it appears the plan is in general conformity with the Local Plan Core Strategy.</p> <p>Policy WNDP3-It would help if the parish could identify where they consider the settlement of Woolhope is –this is something that could possibly align with the conservation area? It is evident that Woolhope has a village core so it may be worth revisiting and sometimes allocation are the best approach to avoid ambiguity when it comes to implementing the plan policies.</p> <p>If the parish doesn't want to go down the route of allocating a settlement boundary then you can specify place names of where (Little Birch and Aconbury NDP has approached it this way).</p> <p>WNDP8-There is a Poly tunnel guide it may be something to look through and reference in the supporting text. polytunnels planning advice guide.</p>	<p>The Group has previously rejected the concept of defining a settlement boundary. No change. Woolhope village is sufficient as a place name.</p> <p>Add in reference to polytunnel guidance.</p>
Herefordshire Council	<p>Strategic Policy</p> <p>Overall the plan is in general conformity with the Local Plan Core Strategy. A full conformity table can be found in Appendix 1.</p>	<p>Comments noted. Add in reference to Herefordshire assessment in Basic Condition Statement.</p>
Herefordshire Council	<p>Development Management</p> <p>With regard to WNDP3, previous experience suggests that actually defining a settlement boundary will bring about greater certainty and less confusion about what constitutes the “built form” of the village - I think this is the first NDP that I have read which includes a Design Code informed by the latest guidance. This is really encouraging and a very useful tool. My only comment is that the Coding could potentially stifle contemporarily designed proposals with the reference to matching materials and roof forms.</p>	<p>See previous comment on settlement boundary. Comments on Design Code noted.</p>
Herefordshire Council	<p>Environmental Health (Environmental Protection –air, land, water protection contaminated land)</p> <p>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><input type="checkbox"/> Given that no specific sites have been identified in the plan I am unable to provide comment with regard to potential contamination.</p> <p><input type="checkbox"/> I would however mention the following regarding 'Policy WNDP5:</p>	<p>Comments noted. These matters can be dealt with as part of the planning application process. No change.</p>

Woolhope Neighbourhood Development Plan Consultation Statement, February 2024

Respondent	Comment	Suggested Response
	<p>Change of use of agricultural buildings to dwellings and holiday use'; Some farm buildings may be used for the storage of potentially contaminative substances (oils, herbicides, pesticides) or for the maintenance and repair of vehicles and machinery. As such it is possible that unforeseen contamination may be present on the site. Consideration should be given to the possibility of encountering contamination on the site as a result of its former uses and specialist advice be sought should any be encountered during the development.</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 of as potentially contaminative and any development should consider this.</p>	
<p><b>Herefordshire Council</b></p>	<p>General comments:</p> <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> <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>	<p>Comments noted. No change.</p>
<p><b>National Gas Transmission</b></p>	<p>National Gas Transmission has identified that it has no record of such assets within the Neighbourhood Plan area.</p>	<p>Comment noted. No change.</p>
<p><b>National Grid electricity Transmission</b></p>	<p>An assessment has been carried out with respect to NGET's assets which include high voltage electricity assets and other electricity infrastructure.</p>	<p>Comment noted. No change.</p>

Woolhope Neighbourhood Development Plan Consultation Statement, February 2024

Respondent	Comment	Suggested Response
<b>Environment Agency</b>	<p>NGET has identified that it has no record of such assets within the Neighbourhood Plan area.</p> <p>Flood Risk: Based on our indicative Flood Map for Planning (Rivers and Sea), the NP area is shown to be predominantly located in Flood Zone 1, and therefore has a low fluvial flood risk potential. However, we note an ordinary watercourse to the South that has some associated Flood Zones 2 and 3 within the NP area, alongside several smaller ordinary watercourses.</p> <p>We would not, in the absence of specific sites allocated within areas of fluvial flooding, offer a bespoke comment at this time. Please note that other potential development areas may be at flood risk given the presence of 'ordinary watercourses' which are un-modelled based on the scale and nature of the stream and receiving catchment (less than 3km<sup>2</sup>).</p> <p>It should be noted that the Flood Map provides an indication of 'fluvial' flood risk only. You are advised to discuss matters relating to surface water (pluvial) flooding with the drainage team at Herefordshire Council as the Lead Local Flood Authority (LLFA).</p>	<p>Comment noted. No change.</p>
<b>Environment Agency</b>	<p>River Wye SAC Catchment:</p> <p>It is noted that Woolhope falls within the Lower Wye catchment area and, although this area is not failing its water quality objectives at present, an AA has been undertaken in light of recent comments from Natural England (NE). As confirmed within the AA document the most significant issue within the River Wye SAC Catchment (included the River Lugg) relates to water quality and the potential impact of policies and site allocations within the NDP's.</p> <p>NE are the primary statutory consultation body for AA's and, ultimately, they would need to be satisfied that there is reasonable certainty to take forward the Policies and site allocation in the NDP in discussion with Herefordshire Council. We have previously provided comment on similar NDPs' with a view to ensuring a robust submission and that development can be achieved without impact on the integrity of the SAC, primarily within the Lugg Catchment.</p> <p>In this instance, as stated above, Woolhope falls in the Lower Wye Catchment and in an area that is not currently failing its water quality objectives. Therefore, we would raise no concerns at this time.</p> <p>The AA has found that: "The results of this Appropriate Assessment indicate that there will not be a significant effect on the integrity of the River Wye (including</p>	<p>Add reference to nutrient neutrality to Policy WNDP3. Herefordshire to update the Appropriate Assessment (AA).</p>

Woolhope Neighbourhood Development Plan Consultation Statement, February 2024

Respondent	Comment	Suggested Response
	<p>River Lugg) SAC or the (include any other) when the mitigation and avoidance measures have been taken into account”.</p> <p>The AA (section 8.8) refers to a section of policy WNDP 3 ‘that requires development to be nutrient Neutral this acts as a policy safeguard for if the Lower Wye catchment did follow that of the current Lugg catchment’, however, I cannot see that there is reference to nutrient neutrality either in section WNDP 3 or throughout the entirety of the Draft NDP document. You may wish to confirm this wording in preparation for the Regulation 16 stage. You may also wish to reference the Phosphate Budget Calculator Tool and associated guidance as an important tool in helping applicants meet policy requirements.</p>	
<b>Historic England</b>	<p>Historic England is supportive of both the content of the document and the vision and objectives set out in it.</p> <p>We commend the commitment in the Plan to support limited well designed locally distinctive development that is sympathetic to the character of the area including its rural landscape character, heritage assets and green infrastructure.</p> <p>We do note that the complementary Woolhope Design Guide produced by Aecom that provides guidance for developers and other planning “actors” is nowhere referenced in the Neighbourhood Plan. This is perhaps an oversight that might usefully be rectified?</p>	Supporting comment noted. Update reference to the Design Code in the NDP.
<b>Natural England</b>	Natural England does not have any specific comments on the Woolhope Neighbourhood Plan.	Noted. No change.
<b>Dormington and Mordiford Group parish Council</b>	<p>The Draft plan and Design Guide, look and read very well, And seem appropriate For the area. thank you for sharing with us, and our own Draft Plan has similar aspirations. We will share it with you shortly.</p> <p>Para 1.4 states the Plan is in accordance with the Herefordshire Local Plan Core Strategy 2011 – 2031. Have you considered making provision in the plan for the new Strategy 2021-2041 (to be published shortly)? <a href="https://www.hvoss.org.uk/latest-news/herefordshire-local-plan-2021-2041.aspx">https://www.hvoss.org.uk/latest-news/herefordshire-local-plan-2021-2041.aspx</a></p> <p>Note the file name of the Plan shows as Llangarron's, so maybe this could be amended? We wish you good luck.</p>	Supporting comments noted. The NDP must be in general conformity with adopted strategic policy not emerging policy – no change. Check document file names.
<b>Suzanne Noble</b>	Thank you for sending this. I would like to add a point in the environment section. In addition to the types of designated nature reserves mentioned, the parish also has a few Roadside Verge Nature Reserves, which are a valuable and important resource and refuge for wildlife and are particularly vulnerable to damage by	Add in reference to Roadside Verge Nature Reserves.

Woolhope Neighbourhood Development Plan Consultation Statement, February 2024

<b>Respondent</b>	<b>Comment</b>	<b>Suggested Response</b>
	inappropriate cutting, driving across them, littering and other thoughtless human activity.	
<b>Welsh Water</b>	Having reviewed the Plan, I understand that there are no residential allocations proposed. However, I can advise that our Woolhope Wastewater Treatment Works (WwTW) does have the capacity to accommodate the residual requirement of 13 units, if indeed the developments wish to connect to the public sewerage network.	Comments noted. No change.
<b>Wye Valley Area of Outstanding Natural Beauty (AONB) Office</b>	Page 10 – Figure 3 – can some clarification be provided as to what is being defined as Woolhope Village Centre and what is defined as Woolhope Village Edge? This could be subjectively misinterpreted, particularly in relation to the Wye Valley AONB. We would encourage the NDP steering group to clearly define a settlement boundary which helps to clearly define the main built form of Woolhope, to help assist in relation to the AONB boundary designation.	Comment noted. The Group has previously decided against identifying a settlement boundary. No change.
<b>Wye Valley Area of Outstanding Natural Beauty (AONB) Office</b>	Page 11 – noting the responses received in relation to Affordable Housing as part of the parish survey, it may be of relevance to consider the following additional policy in any NDP: “Application for affordable housing provision in the parish require: - at least 50% affordable housing in market housing developments; - 100% affordable housing on Rural Exception Sites, with a lower percentage only being permitted in exceptional circumstances and the absolute minimum being 75%; - on-site affordable housing provision for housing developments of five units or fewer”. Having a higher percentage of affordable housing will reduce the total number of houses that need to be built to meet locally identified affordable housing need. This, in turn, would help to ensure that the scale and extent of development in the Wye Valley AONB is limited, as required through paragraph 176 of the NPPF. The higher price tag associated with housing in protected landscapes is a factor in justifying a high/higher percentage of affordable housing in these areas.	Comments noted, but the suggested policy would not be in general conformity with strategic or national planning policy. The 50% threshold being higher than strategic policy and both strategic and national policy allow for market housing to support the bringing forward of rural exception sites. No change,
<b>Wye Valley Area of Outstanding Natural Beauty (AONB) Office</b>	Bottom of Page 13/top of Page 14 and further at bottom of Page 16/top of Page 17 – we would consider that you should promote the parish as a highly valued landscape, acknowledging the Wye Valley AONB and Woolhope Dome. The landscape of Woolhope Parish is diverse, dramatic and steeped in history. It is shaped by its distinctive underlying geology. It is undoubtedly a valued landscape within the meaning of paragraph 174 of the National Planning Policy Framework 2021. The NPPF does not define what a valued landscape is. However, the Landscape Institute’s Guidelines for Landscape and Visual Impact Assessment (GLVIA 3) set out how to identify a valued landscape at box 5.1, under the headings Landscape Quality, Scenic Quality, Rarity, Representativeness, Conservation Interests, Recreation Value, Perceptual Aspects and Associations. Woolhope’s landscape readily meets all of these factors. The landscape is not only visually scenic, but it is exceptionally tranquil and an area where visitors can	Revise sections on landscape to take on board these comments and recognise the valued local landscape.

Woolhope Neighbourhood Development Plan Consultation Statement, February 2024

Respondent	Comment	Suggested Response
	<p>enjoy the sights, sounds and smells of nature, undisturbed by traffic or significant development. The rarity of the landscape derives from its geology and its location. It stands at a point where the low fertile agricultural lands of Herefordshire shift to high slopes and woodland. Such unspoilt transitional landscapes are rare. At the same time, the landscape contains qualities representative of the Wye Valley, which is why it is within the AONB. The parish is enjoyed by tourists who visit for the beauty of the landscape and by residents, many of whom have chosen to live here because of the high quality of the landscape and the value they place on it. Points noted in respect of scenic quality are also important perceptual aspects of the Woolhope landscape include:</p> <ul style="list-style-type: none"> <li>• to protect, manage and enhance its landscape character, important species, soils, water resources, tranquillity and recreational opportunities</li> <li>• To protect, manage and enhance and improve the valleys, the habitat mosaic of semi-natural grasslands, meadows, woodlands, hedgerows and riparian habitats to enhance ecological networks, strengthen the distinctive landscape character.</li> <li>• to protect and manage associated watercourses, wetlands and woodlands, maintaining high water quality, reducing the potential risk of flooding</li> <li>• To conserve and enhance the area's distinctive historic environment, cultural heritage and nationally important geological sites, demonstrating how the interaction of natural and historic factors has influenced the distinctive character of its landscape and settlement patterns.</li> </ul> <p>The environmental assets within Woolhope Parish, comprising diverse and notable natural habitats and features, significant heritage assets and a small-scale settlement pattern, combine to provide a varied, attractive and high-quality landscape of significant cultural value. The Parish is partly within an Area of Outstanding Natural Beauty within eastern Herefordshire. For the reasons set out above, the landscape of the parish is highly valued in the context of the NPPF paragraph 174 and 176. It is, therefore, undoubtedly a valued landscape. Protecting and enhancing this valuable national asset should be given the highest priority.</p> <p>Development proposals should contribute positively to the high-quality landscape within the Parish through:</p> <ul style="list-style-type: none"> <li>• Being appropriate to the local landscape character in terms of siting, scale, nature and design, demonstrating specific reference to the relevant Landscape Character Type and ensuring the features contributing to their identification are conserved, restored or enhanced through measures consistent with their characterisation;</li> </ul>	

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Respondent	Comment	Suggested Response
	<ul style="list-style-type: none"> <li>• Protecting, conserving and enhancing those elements and features of natural, historic and scenic beauty within the Parish that contribute to its landscape quality;</li> <li>• Protecting hedgerows, woodlands, tree cover and important trees;</li> <li>• Incorporating landscaping schemes that ensure development both integrates with its surroundings and offers enhancements, including to biodiversity;</li> <li>• Conserving visual amenity for all, including residents and users of public rights of way and open spaces. Views including sightlines through to important features should not be impeded.</li> </ul> <p>The following information may be required for developments likely to influence the landscape, its features or the setting of settlements: 1. Tree surveys, to indicate trees to be retained in accordance with good arboricultural practice, will be required where development proposals are likely to affect large numbers of trees or important trees of potential amenity value. It will not result in the loss of important features, especially those of significant landscape and biodiversity value, such as trees, hedgerows, or significant frontage gaps or green spaces that contribute to the unique character of the settlement.</p>	
<p><b>Wye Valley Area of Outstanding Natural Beauty (AONB) Office</b></p>	<p>Page 20 – 4.1 (Draft 2031 Woolhope NDP Vision) – to re-write to the following (added words in red): “By 2031 Woolhope village and the smaller settlements in the parish will have retained their separate characters and identities and will support strong community spirit. The area’s <b>highly-valued</b> natural and built environment will have been protected, <b>conserved</b> and enhanced. Community facilities and assets will be valued, well-used and thriving; infrastructure will be meet community needs and our roads will be well maintained and safe.”</p>	<p>Amend Vision as suggested.</p>
<p><b>Wye Valley Area of Outstanding Natural Beauty (AONB) Office</b></p>	<p>Page 20 - Objective 1 – To re-write to as follows: “To manage and protect the <b>highly-valued</b> local environment, countryside and natural and built heritage assets”.</p> <p>Objective 2 – to include reference to conserving and, where possible, enhancing the highly-valued Landscape of Woolhope parish, including those parts of the parish within the Wye Valley Area of Outstanding Natural Beauty.</p> <p>Objective 5 – to re-write to include as follows: “To support the sustainable development of existing local businesses and to support the development of new business opportunities in this <b>highly-valued and</b> sensitive rural location.”</p>	<p>Amend objectives as suggested.</p>
<p><b>Wye Valley Area of Outstanding Natural Beauty (AONB) Office</b></p>	<p>Page 25 – 6.9 – make reference to Paragraph 176 of the NPPF, which specifically relates to Areas of Outstanding Natural Beauty, as AONBs are also referenced under Policy LD1 of the Council’s Core Strategy. The paragraph I think underplays the importance of AONBs. Reference also needs to be made to the Wye Valley AONB Management Plan in the NDP, which is currently absent.</p>	<p>Add in reference to para. 176 of the NPPF.</p>



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<p><b>Wye Valley Area of Outstanding Natural Beauty (AONB) Office</b></p>	<p>Policy WNDP1 – Landscape and Biodiversity. Other NDPs often break these down into separate smaller policies, as they are separate themes. We would encourage this be followed also.</p> <p>“New proposals for development should seek to protect and enhance the <b>highly-valued</b> landscape character, <b>visual amenity</b> and biodiversity of the Parish, <b>including those parts of the parish which lie within and the setting of the Wye Valley Area of Outstanding Natural Beauty (AONB)</b>. To protect the landscape character of the area new proposals should positively enhance the existing landscape and minimise their impacts on: 1. The scattered settlement pattern of Woolhope village, rural hamlets, and isolated farmsteads; 2. The tranquil rural character of the area; 3. Biodiversity sites – including SSSIs, LNR, SWS; 4. Geology and geodiversity, particularly where such assets are part of or associated with the Woolhope Dome; 5. Field pattern and field boundaries, especially hedgerows and hedgerow trees; 6. Valued scenic views; 7. The unregistered parks and gardens of Devereux Park and Wessington Court; 8. Open spaces, especially Broadmoor Common; Public Rights of Way, identified Walks and Trails and non-designated footpaths; 9. Ancient woodland, veteran, ancient, mature and notable trees; and 10. Watercourses and ponds.</p> <p>Development proposals should demonstrate how they have addressed the preservation, and restoration, of existing green infrastructure, for example, trees, hedges and woodland. Wherever possible Development should support the creation of new habitats, for example by planting orchards as part of biodiversity net gain and as a resource for the community. Traditional hedgerows should be retained, and new hedgerows should use appropriate native and local species which enhance biodiversity. The priority for new development should be to avoid direct and indirect impacts upon landscape character and biodiversity. Where impacts cannot be avoided, mitigation and then compensation measures should be provided. <b>Any adverse effects on landscape character, visual amenity or biodiversity which cannot be mitigated to an acceptable degree, development shall not be supported.</b></p>	<p>Retain as one policy, but amend as suggested in comments. Some deletions to policy text were suggested, but these are not accepted.</p>
<p><b>Wye Valley Area of Outstanding Natural Beauty (AONB) Office</b></p>	<p>Policy WNDP2: Protecting historic assets and settlement character – re-write as follows: “Development proposals should: 1. <del>Not adversely affect</del> <b>Protect, conserve and where possible, enhance</b> listed Buildings, Woolhope Conservation Area, important landscapes and valued landscape features, <b>including the Wye Valley Area of Outstanding Natural Beauty (AONB)</b>, and buildings considered to be of local architectural, or historic interest which contribute to the character of the neighbourhood area. 2. Preserve the character Woolhope village, and other smaller settlements, by using designs and building materials for new development which respect local building tradition, features and distinctiveness. Schemes should respond to the height and scale of nearby</p>	<p>Amend as suggested.</p>

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Respondent	Comment	Suggested Response
	buildings and new buildings should not exceed 2 storeys. Schemes which contribute to light pollution <del>should be avoided</del> <b>will not be supported, and should only be included where absolutely necessary</b> 3. Protect the setting of Woolhope village and the character of the open countryside by locating new development sympathetically within or <del>at the edge of</del> <b>immediately adjacent</b> to the existing built form of the village.”	
<b>Wye Valley Area of Outstanding Natural Beauty (AONB) Office</b>	Page 32 – Policy Justification – the Wye Valley AONB Partnership is about to launch a new draft position statement which advises that: The housing need figure identified using the Government’s standard method should not be presented as a ‘target’ for housing provision. It should be recognised that the policies of the NPPF, relating to AONBs and other relevant designations, may mean that it is not possible to meet objectively assessed needs for development in full through the plan-making process. Consideration should be given to whether the constraints relating to the AONB designation merit exceptional circumstances which may justify an alternative approach to the standard method for assessing housing need. Where a local authority area that overlaps with the AONB is required to accommodate unmet needs from neighbouring local authorities, this unmet need should not be factored into housing provision in the AONB at either the plan-making stage or development management stage. Housing developments that would extend, into the AONB, should not be allocated or permitted except in exceptional circumstances and where it can be demonstrated that it would be in the public interest to do so.	Comments noted. No change.
<b>Wye Valley Area of Outstanding Natural Beauty (AONB) Office</b>	7.5 - From previous lessons learned from other Neighbourhood Development Plans, it may be of suggestion to consider allocating a site for new residential development. Having regard to Paragraph 14 of the NPPF (2021), often settlements in AONBs become under pressure to accommodate unnecessary development because of a lack of allocations put forward by an NDP. This is particularly pertinent to take into consideration should Woolhope remain an identified settlement for new residential development within the revised Herefordshire Local Plan. A call for sites and potential consideration of a Landscape and Capacity and Sensitivity Study may be of suggestion to help identify those parcels of land which in landscape terms have capacity to accommodate new residential development – see Colwall/Cradley NDPs as good examples. What will happen when inevitably the Council would not be able to demonstrate a five-year housing land supply? Paragraph 14 of the NPPF will be engaged.	Comment noted. No change.
<b>Wye Valley Area of Outstanding Natural Beauty (AONB) Office</b>	Policy WNDP4 – Replacement dwellings in the countryside – to re-read as: Proposals for replacement dwellings outside Woolhope settlement boundary will be acceptable in principle subject to the applicants demonstrating that its residential use has not been abandoned and that demolition and rebuild is a	Comments noted. This policy deals with replacement of existing dwellings. To make this clear add word “existing” to policy title and policy wording.

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Respondent	Comment	Suggested Response
	<p>sustainable option. The replacement dwellings should be comparable in size and scale with the existing dwelling, and sited within the lawful domestic curtilage. This policy does not apply to the demolition and reconstruction of modern portal framed or similar agricultural, storage or commercial buildings or to the demolition and reconstruction of temporary buildings and structures, or buildings which may benefit from 'Class Q' consent or such a fall-back position.</p>	
<p><b>Wye Valley Area of Outstanding Natural Beauty (AONB) Office</b></p>	<p>Policy WNDP5 - : Change of use of agricultural buildings to dwellings and holiday use - TO RE-READ AS: "Where planning consent is required, proposals for the change of use of former agricultural buildings to dwelling houses and holiday accommodation, including extensions, ancillary buildings, or areas of hard standing, will be supported where: 1. The building is substantially intact and capable of conversion without significant structural alterations; 2. Development does not adversely affect the character or appearance of the existing building or have a detrimental impact on its surroundings, <b>to include an assessment on landscape character and visual amenity</b>; and 3. There is no detrimental impact on residential amenity for proposed occupiers or adjacent properties and there will be no conflict with existing adjacent uses."</p>	<p>Comment noted. No change. If required an assessment will be required as part of the planning application process.</p>
<p><b>Wye Valley Area of Outstanding Natural Beauty (AONB) Office</b></p>	<p>Policy WNDP7 - 7: Protecting Existing Community Facilities and Supporting Investment in New and Improved Facilities – TO RE-READ AS: "The following community facilities in Woolhope Parish are identified on the Policies Map (Figure 12) and protected: • The Crown Inn • Butcher's Arms • Woolhope Parish Hall • St. Georges Church • Berryfield sports field • Berryfield play area • Berryfield tennis courts Proposals involving the loss of a community or local service will be strongly resisted. In exceptional circumstances, however proposals for a change of use of a community facility or local service will be considered where it can be clearly demonstrated, through an agreed marketing strategy, that the use is no longer viable or plans for its replacement are included within the proposal. Proposals which improve the range of community facilities and local services available within the Parish will be encouraged where there will be no significant adverse impact to residential amenity, traffic generation, parking and highway safety, noise and light pollution, <b>landscape character, visual amenity and the River Wye SAC</b>. Provision of other appropriate community facilities may be permitted outside the Woolhope settlement boundary where it has been adequately demonstrated that a clearly defined need exists. Where appropriate developers should contribute towards the provision of new community facilities and infrastructure both onsite and offsite, to help support sustainable growth. New development in the Parish will help deliver community needs through Section 106 Agreements, CIL or any other contributions that may become available during the period of the Plan."</p>	<p>Amend as suggested.</p>

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Respondent	Comment	Suggested Response
<p><b>Wye Valley Area of Outstanding Natural Beauty (AONB) Office</b></p>	<p>Policy WNDP8 - New agricultural buildings and poly tunnels – TO RE-READ AS: “1. Large agricultural buildings, polytunnels and other rural business buildings which require planning consent will be supported in fields and agricultural holdings <b>where there would not be significant visual intrusion within the landscape adverse harm to landscape character and visual amenity, which cannot be outweighed by mitigation through appropriate landscaping schemes.</b> There should be an understanding of the full extent of any proposed development and a clarity concerning associated developments <b>and impacts.</b> Applicants should make hours of operation clear, and these should not result in activity in unsociable hours for local residents. 2. Development proposals should give careful consideration to potential impacts in terms of noise, odour and light which might be detrimental to the enjoyment of the area by neighbouring residents and should be sited to minimise any such impacts on local residential or tourism amenity. 3. New agricultural and commercial buildings and structures should be sited and designed sensitively to minimise visual and landscape impacts through appropriate screening and landscaping. Larger buildings should be “broken up” using a change in materials, colour or ridge height. Where possible natural materials such as wood and neutral, earth tones should be used to help blend large buildings into the countryside and landscape. 4. Applicants will be required to demonstrate that the vehicular means of access and local highway network (in terms of design and capacity) are adequate to cater for increases in traffic generation in terms of numbers and types of vehicles. Applicants will meet the cost of any extra measures that are required to safeguard road safety. 5. Designs should incorporate energy and resource efficiency measures and minimise light pollution to protect dark skies. Any such measures should have minimal impact on the landscape. They should seek to minimise environmental impact, for example, impact on water courses, ecology and biodiversity. Consideration should be given to the safe disposal of waste materials. 6. These developments, where should support the local economy and provide local job opportunities.”</p>	<p>No change.</p>
<p><b>Wye Valley Area of Outstanding Natural Beauty (AONB) Office</b></p>	<p>Page 48 – 10.12 – should it be Policy WNDP9 NOT WNDP10? Policy WNDP9: Tourism and rural diversification – No comments.</p>	<p>Check and amend policy references where necessary.</p>
<p><b>Wye Valley Area of Outstanding Natural Beauty (AONB) Office</b></p>	<p>Policies which have not been included but you may wish to consider a full-householder policy only e.g. applications for extensions and an open/green Spaces policy – including spaces like LWS, SWS etc.</p>	<p>These matters are covered elsewhere in the development plan for Herefordshire. No change.</p>
<p><b>Wye Valley Area of Outstanding Natural Beauty (AONB) Office</b></p>	<p>Finally, it is suggested to have a page at the end of the NDP which lists all policies on a stand-alone page for easier cross-reference.</p>	<p>Add in Policy list.</p>

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Respondent	Comment	Suggested Response
<p><b>Jack Powell/Claire Sargeant</b></p>	<p>We note however that you have not identified any sites for development, instead relying on wind fall housing. It is our understanding that if the NDP fails to identify sites for housing development then it could be afforded less weight by any decision maker. We would very much welcome a NDP that includes policies and allocations to meet local identified need as per paragraph 14(b) of the National Planning Policy Framework (NPPF).</p> <p>The questionnaire results identify that respondent's favour:</p> <ol style="list-style-type: none"> <li>1. Development on the edge of the existing settlement boundary; and</li> <li>2. The conversion of existing agricultural buildings.</li> </ol> <p>With these considerations in mind, we would propose that a suitable, available and sustainable location would be 'The Avenue' adjacent to Berryfield, which contains an agricultural building right on the edge of the existing settlement boundary.</p> <p>As a local family, we of course have a vested interest, being custodians and active members of the community for over a century. The land is currently owned by my father, Colin Powell of Scar Farm.</p> <p>We would welcome the opportunity to convert this barn into our family home, to allow myself, my fiancé and our three children to move back to Woolhope and become active member of the community where I grew up.</p> <p>We have no interest in redeveloping the barn to maximise short term financial return, it is intended to be our forever home. We have commissioned local, Passive House architects to draft a sustainable and environmentally focused proposal, which seeks to respond to the local context whilst also creating a contemporary high-quality design - a copy of the proposals are attached. As part of these proposals, we would seek to relocate the entrance to the field further up the road as the current entrance is on the corner. Not only would this provide safe vehicular access to a proposed dwelling but would also be of benefit for the community for parking at the summer fête, and as an overflow provision for Community Hall and Church events.</p> <p>The proposed design has been informed by a Landscape Visual Impact Assessment (LVIA) and the proposal is considered to be landscape-led. I have attached a copy for your reference.</p>	<p>There is no requirement for neighbourhood plan to identify housing sites. Nor does this change the weight to be afforded the plan or its policies. No change. The development can be progressed through the planning application process – this, in time, may include an assessment against the NDP's policies.</p>

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Respondent	Comment	Suggested Response
	<p>We have sought pre-app planning advice from the Herefordshire County Council, and they would object to a single development due to the limited number of public benefits it could deliver. They would look more favourably on a larger development, which could deliver wider public benefits (affordable housing etc). It is our understanding that if the NDP were to identify 'The Avenue' as a site for a single development, then the NDP could afforded greater weight to opposing speculative, larger developments within the Neighbourhood Plan Area.</p> <p>As you are aware, my fiancé and I were delighted to meet with the Neighbourhood Plan Groups' planning consultants on their tour of the village and enjoyed spending several hours showing them the local environs, community and giving them a history of the village and its development. We have a huge interest in the community, it's vibrancy and would very much welcome the opportunity to return to the community with our young, growing family.</p> <p>We would be delighted to have an opportunity to discuss our proposals with you in person and would welcome your inputs and thoughts on the benefits such a development could offer our community.</p>	
<b>Mark July</b>	<p>This section (para 1.3) could engender Woolhopians interest by referring to the present status of NDPs in the adjoining parishes. This would show the extent of community participation in the process hereabouts. We are following on a majority.</p> <p>Para 1.7 is a clean bill of health re no harm to international sites' interests, but a pointer to the local importance of care of the freshwater environment re minimising water pollution from all sources – septic tanks, sewage effluent, farms and fields - and factoring in conservation of bats roosts and habitats through the planning system. The parish can use this plan to positively support the 2 international sites' conservation.</p>	Add in update on neighbouring NDPs. Comments on para. 1.7 noted.
<b>Mark July</b>	<p>Para 2.3 and below cites the 2011 Census data, but the Design Code (1.2) quotes from a 2020 Census ( 486 to 518 inhabitants in those 9 years). It's a pity the plan doesn't use the 2020 data – why not?</p>	Update Census data to 2021. This data was not available when plan was published at Regulation 14.
<b>Mark July</b>	<p>Para 3.1 The village is southeast of Hereford.</p> <p>Para 3.8 The term 'Special Wildlife Sites' is redundant; these are now termed 'Local Wildlife Sites'. The terminology needs changing on the map as well. Broadmoor Common is owned by Herefordshire Council and managed by Woolhope Parish Council.</p>	Amend para 3.1 and para 3.8 as suggested. Maps 2 and 3 are from the Environmental Report prepared by Herefordshire Council – no change.

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Respondent	Comment	Suggested Response
	<p>Maps 2 and 3 are not a great help in relating parish geography to assets and planning factors. More relevant, clear and accurate maps would be a big improvement in a later iteration of the plan ( Might such be commissioned by the WPC?)</p>	
<p><b>Mark July</b></p>	<p>Vision is good bar the typo re “infrastructure will”....</p> <p>For the avoidance of doubt, I consider a map naming the “smaller settlements” is needed (see S.3 comments)</p> <p>Objective 1 To cover the full scope of aspirations in the Residents’ Survey this objective should be “ To sustainably manage, protect and enhance the..... Current management may or may not meet this objective in lots of respects; the attributes are under significant pressure of change, not all of it helping their status e.g. soil erosion and water pollution, decline of farmland birds. We should aim high.</p> <p>Objective 5 The two parts of this objective need careful scrutiny. I support the intent re existing businesses and I understand the need for the second element, but object because it’s too open-ended as to scope and consequences. I offer the alternative “ to support the development of new business opportunities which are well-suited to this sensitive rural location and further the NDP Vision”</p> <p>Most or many existing farm businesses may wish to pursue economic diversification business opportunities in the next decade; there is no data available to reveal this. Recent planning cases involving farm diversification have illustrated the potential for conflict with landscape and amenity. New businesses in the round could embrace a wide potential scope, from solar power installations to forest product processing. They could be entirely harmonious or pose real adverse impacts on the area’s qualities. Hence the proposed objective wording.</p>	<p>Support for Vision noted – amend Vision as follows “infrastructure will <del>be</del> meet”.</p> <p>Include a map naming the smaller settlements.</p> <p>Amend Objective 1 as suggested.</p> <p>Comments on current land management practices noted – no change.</p> <p>Objective 5 – no change.</p>
<p><b>Mark July</b></p>	<p>Objective 1 I object to the wording and propose the Objective as “ To sustainably manage, protect and enhance.....” As well as aligning with the NPPF, this wording better dovetails with the NCA SEOs (p 20) and the statutory Wye Valley AONB Management Plan.</p> <p>Para 6.4. Could the photo captions on pp 19, 24 identify which of these two landscape types they illustrate?</p> <p>Para 6.10 Substitute ‘Local Wildlife Sites’ for ‘Special Wildlife Sites’</p>	<p>See previous suggested amendment.</p> <p>Amend photo captions.</p> <p>Amend as suggested.</p>

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Respondent	Comment	Suggested Response
	<p>Policy WNDP1 p22 This is an excellent policy that can be improved with removal of the repetition and a proposed small wording change for a sharper focus on intentions. I offer this alternative for consideration.</p> <p>“New proposals for development should seek to protect and enhance the landscape character and biodiversity of the Parish. Proposals should avoid or minimise adverse impacts and positively contribute to the conservation of the following :</p> <ol style="list-style-type: none"> <li>1. As worded</li> <li>2. As worded</li> <li>3. Biodiversity sites -including SSSIs, LNR, LWS.</li> <li>4. Geology and geodiversity, particularly the RIGS ( Note: These are Regionally Important Geological Sites selected to represent the key features of the geology of the Woolhope Dome. A Glossary entry would inform.)</li> <li>5.-10, As worded.</li> </ol> <p>Para “ Development proposals should....enhance biodiversity”. Unchanged with an extra final sentence. “Opportunities to support the relevant objectives of the Wye Valley AONB Management Plan should be addressed” Final para. As worded.</p> <p>Policy WNDP2 p23 Strong support. The word ‘of’ is missing from “preserve the character”....</p>	<p>Amend clauses 3 and 4 of Policy WNDP1 as suggested.</p> <p>Amend as suggested.</p> <p>Policy WNDP2 support noted – correct typo.</p>
<p><b>Mark July</b></p>	<p>Policy WNDP3 There is an important consideration that is missing from the policy pertaining to the water environment, not least given the ongoing severe phosphate pollution harm to the River Wye SAC/SSSI, from point and diffuse sources across the county and upstream, and that is how new housing with attendant increased population, whether in the village curtilage or elsewhere, will not worsen that cumulative nutrient pollution. Malfunctioning/neglected septic tanks for housing and their sewage overflow leakage to watercourses is a widespread, if unmonitored local problem. The village Sewage Treatment Works is probably (?) at load capacity. It does not have phosphate stripping technology for the present treated effluent volumes and is unlikely to add this improvement anytime soon.</p>	<p>Comments noted. The Herefordshire Council Environment Report prepared to assess the WNDP notes that “Within the whole catchment of the River Wye, which includes the River Lugg, mains drainage issues with regards to water quality are being resolved through the Core Strategy / Local Plan and development of a Nutrient Management Plan.” No change to the WNDP.</p>



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Respondent	Comment	Suggested Response
	<p>I propose another criteria is included in this policy to state what is reasonably expected in the above regard, and suggest Herefordshire Council can provide such derived from other parishes NDPs.</p> <p>The relationship between the Woolhope STW capacity to ensure legally compliant effluent standards and potential population growth of the village is further justification for the stance set out in para 7.8</p>	
<p><b>Mark July</b></p>	<p>Para 9.7 'Community Asset' has a statutory meaning which should be described in the Glossary</p> <p>Policy WNDP7 has a 'howler' in the penultimate para. There is no Woolhope settlement boundary or intention to define one! It also begs the question what are the 'appropriate' community facilities? Are they all those aspired to by residents in the survey, or some other prioritised selection with a rationale from the WPC standpoint?</p> <p>Last para. I'd like to see recognition that " Where appropriate, developers should contribute to the maintenance and provision. ....sustainable growth" This wording change could help fund the upkeep of existing valued infrastructure such as the network of footpaths and bridleways, where there is much scope for modest improvements. Whether deemed a community facility or not, the path system has a high relevance to the parish quality of life.</p>	<p>The final sentence of paragraph 9.7 is unclear and confuses "Community Asset" with "Asset of Community Value". The latter being assets the community can nominate for Herefordshire Council to protect under non-planning legislation. Amend final sentence to "an Asset of Community Value." and add to Glossary.</p> <p>Replace "settlement boundary" with "existing built form of Woolhope village". Appropriate community facilities will be assessed against neighbourhood plan and Core Strategy policies.</p> <p>Amend to "contribute towards the provision of new or maintenance of existing community facilities"</p>
<p><b>Mark July</b></p>	<p>I made the case for a change to Objective 5 in Section 4, thus repeat that objection here.</p> <p>Para 10.9 I firmly disagree with the "wholly complementary" quote. The intensive poultry sector's waste impact on our rivers gives that the lie!</p> <p>Alongside the policy justification in paras 10.1 and 10.2, should be added a necessary consideration for Woolhope as to the form of economic development appropriate to the nationally-important landscape of the AONB, having regard to the AONB statutory management plan policy.</p> <p>WNDPE8 is commendable and supported. I suggest drop the 'where possible' in section 6.</p>	<p>Objective 5 – no change.</p> <p>This is a quotation from the Economic Development Strategy – no change.</p> <p>Amend policy justification as suggested.</p> <p>Support noted.</p>

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Respondent	Comment	Suggested Response
	<p>Para 10.12 This para needs a stiff edit for repetition. I'm unaware of camping and caravanning sites in the parish?</p> <p>WNDP9 . I have referred to the phosphate pollution concern re our watercourses and the downstream river Wye. This policy should be extended to recognise the water pollution arising from rural tourist facilities if foul drainage is inadequate, hence I propose a new part 4;                      " They minimise risk of water pollution through a best practice, foul drainage design adequate for the maximum visitor capacity"</p>	<p>Remove repetition and check tourist facilities in neighbourhood area.</p> <p>Amend as suggested.</p>
<b>Mark July</b>	<p>Glossary</p> <p>Definitions to add that would help readers .....</p> <p>Community Asset                      Local Wildlife Site                      Strategic Environmental Assessment                      Appropriate Assessment</p>	<p>Add new definitions to Glossary with "Community Asset" replaced by "Asset of Community Value".</p>
<b>Mark July</b>	<p>Design Code</p> <p>If this is a 'final' document, I'm unclear if comments have any standing, but I offer a few:</p> <p>I endorse the importance and quality of this guidance. The introduction 1.1 needs to clarify it is relevant to all forms of built development and the entire parish, as well as the emphasis on housing centred on the village.</p> <p>The age of Silurian rocks is 450m not 250m – check source. (1.2.3)</p> <p>Section 1 of the checklist general design guidelines needs to add guidance on pollution prevention from foul drainage systems; the bullet referring to "drainage infrastructure" does not cover this important local matter for most developments not served by mains sewage. The cited Herefordshire Council SuDs Handbook could offer a steer.</p>	<p>Forward these comments to AECOM for consideration.</p>



## **Appendix 1. Statutory Bodies and Others Consulted**

### ***Parish Councils:***

Stoke Edith

Holme Lacy

Tarrington

Dormington and Mordiford

Fownhope

Brockhampton

How Caple

Much Marcle

Putley

Ward Councillor Barry Durkin

### ***Agencies:***

Herefordshire Council

Natural England

Historic England

Highways England

Welsh Water

The Environment Agency

Campaign to Protect Rural England

Herefordshire Wildlife Trust

Wye Valley Society

Wye Valley AONB

National Grid

Woodland Trust

Herefordshire Housing

Wye Valley NHS Trust

Herefordshire Primary Care Trust





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