

Border Group Neighbourhood Development Plan

Schedules of Representations in response to Revised Draft Plan, April 2017

Schedule 1: Community Representations and Response

Respondent Identification Number	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Suggested Changes Parish Council Consideration (In blue)	Proposed Change Number
C2.1 B Lewis	Policy BG5		Fully concur with policy as set out	
	Policy BG6		Agree that this site should be developed as proposed in the plan	
	General comment		The relative stability of the number of dwellings in the parish over the past 100 years is an indication that the settlement can develop to suit the changing nature and requirements of the inhabitants without necessarily expanding. New dwellings have been built and others have disappeared. The village plan pays attention to the current ridiculous County Council policy of resisting small developments designed to house members of the community who earn their livings in the locality. A sensible development policy, as this proposes, should allow limited new building which, in any case, ought to be limited because of the woeful lack of amenities, any form of public transport and the unsuitability of the badly maintained local roads which should carry weight restrictions barring large HGVs. Other than that, well done the Parish Council	
C2.2 J Davies	General comment		The parish urgently needs more affordable rented housing, mainly to encourage younger families into the villages and to enable local young people to remain in the area where they grew up. Also, from a more selfish position, people such as myself who presently live in accommodation connected to their employment face having to move away when we retire whether we want to or not as there probably won't be housing available locally at rents we can afford. The BGNP appears to recognise the need for more housing but will it ever be built and will local people be able to afford it?	
C2.3 M Brown	Para 1.5		Why has the Parish Plan from 2003 been used as evidence to produce the plan, when the Housing Needs Survey for Border Group Parish Council prepared by Community First much more recently has not?	
	Para 1.18		The final sentence does not make sense. "The policies and proposals that it for the Group Parish are set out in subsequent sections of this document."	
	Para 3.1		Please correct spelling of Lengthsman	
	Para 3.2		The following sentence is difficult to understand: "All four parishes containing settlements are fairly similar in size in terms of number of properties despite Adforton, Brampton Bryan and Lingen being larger than Walford which has a greater number of dwellings in its rural area."	
	Policy BG4		Policy BG4 states "Infill opportunities will be restricted to gaps within the approach road from the south...." If infill	

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			will be allowed as per BG4, why has no settlement boundary showing this area been produced? (See 3.10 copied below) Please confirm the method behind the decision that Brampton Bryan, unlike the other villages in the plan, should not have a settlement boundary, and why no map of Brampton Bryan has been included in the Plan? 3.10 "A settlement boundary within which infill development might take place is not considered appropriate to this village in that this would have a significant adverse effect on its character and appearance."	
	Page 21 Figure 4		As first requested in October 2016, caption for Figure 4 Page 21 is misleading. Suggested change: Figure 4 - Barn Complex at Brampton Bryan for potential conversion to 8/9 dwellings. This request was first made in October 2016, and possibly could have been agreed at the BGPC meeting on 20 December 2016 prior to this consultation. As a result, anyone looking at this photo will be misled.	
	General comment		Please provide evidence of methods used to consult adequately with residents of Brampton Bryan who may not wish to raise matters to a body which includes a representative of their landlord.	
	Meeting House Need document / Site Reference B1		Site Reference B1 says "Redundant barns of considerable historic and scenic value currently let to a tenant. Conversion to dwellings discussed with owners and agent." If they are in use, what evidence has been produced that these agricultural buildings are genuinely redundant? Neighbourhood Planning Guidance Note 21 states ".....the site selection process should be carried out in an open and transparent way, including consultation with the community and the production of a full evidence base to support and justify the conclusions reached." Please provide evidence of consultation with the community of Brampton Bryan on the selection of this site.	
C2.4 S Brown	Policy BG3		I thoroughly approve of site A1. Access to the main road from sites A2 and A3 look dangerous. Has the Highways Department been consulted? In my view safe access to the main road will not be possible and so both these sites are untenable.	
	Policy BG4		Are the barns at B1 really redundant?	

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	Policy BG5		<p>Recently an application at Yew Tree Cottage was refused partly on sustainability grounds. How can ANY development in Lingen possibly comply with sustainability objectives? It appears the village development boundary has been conveniently redrawn to follow ownership boundaries rather than more obvious and natural boundaries such as the Conservation area, resulting in a contrivance that extends the village unnecessarily to the north and south. L2 was recently refused and so should not form part of the NDP. That makes L1 a non starter too. L3 is a sensible brownfield site and should be developed to the maximum if any development at all is justified in Lingen. L4 does not have sensible access to the road. Has the Highways Department been consulted? L5 is a sensible brownfield site but any proposal must meet the approval of near neighbours, again, if any development is justified in Lingen at all. L6 is an extremely poor proposal as it would be a ghastly visual intrusion at a sensitive point in the village and blight the listed church. It is also within the Conservation area and in principle there should be no further development therein otherwise what is the point of the Conservation Area? L7 is beyond ridiculous being outside a sensible development boundary (but included in the manipulated boundary).</p>	
	Policy BG7		<p>Again, the development boundary has been manipulated in order to make wholly unsuitable proposals for sites W1 and W2. Both are in open country and the quality of life for inhabitants would be poor given their proximity to the A4113 and the surprisingly busy C1006.</p>	
			<p>Overall I think the proposed NDP is suggesting far too many dwellings in an area with virtually no services, no transport links to talk about and almost no job prospects. Houses on the market within the BGPC boundary are not selling so the assumption of high demand is erroneous, as is the assumption for the need for Affordable Housing. I am not convinced that any of the various alleged consultations has been in the least bit effective in reaching all parishioners. For example, I have had no leaflets or communications of any kind from the Steering Group or BGPC other than an initial visit from Geoff Bevan who was a parish councillor for Lingen at the time. Admittedly I did say that I was not going to co-operate with the NDP but that was not an excuse to end all communications. My subsequent questions to the Steering Group and its chairman Steve Chilman have been ignored and none answered directly. For example when I asked Steve Chilman for the promised maps showing selected sites I did not receive a reply for over a year and then it came via a third party and was "If Mr brown wants to know where the sites are he can always ask John"! The attitude of the Steering Group to any comments that were not exactly in line with the views of the Steering Group, with its "interested" member(s), was hostile and not commensurate with open and honest consultation. There is further evidence that awkward suggestions and alternative ideas were generally ignored by the Steering Group and that alterations made as a result of (unsatisfactory) consultation were not resubmitted to neighbours before final approval. This came to a head at a meeting on 19Jul16 when Mrs Christine Moore made an effective speech on the issue. See para. 3.4 of BGPC Minutes at http://www.bordergroup-pc.org/wp-content/uploads/2016/08/BGPC-Minutes-19th-July-2016.pdf The whole</p>	

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			process of producing the NDP has been desultory, inaccurate and ill disciplined with an attempt in June 2016 to initiate a “project fear” when it was publicly stated over and over again by Steve Chilman at a well attended, but contentious meeting, that he could not understand why any BGP Councillor would vote against proceeding to the next phase and that delay may very well result in the sort of development being inflicted upon the parish that had been inflicted upon the village of Orleton. It transpired that the councillors who voted against proceeding to the next phase were wholly justified. (See above re: 19Jul16). Another criticism of the way the plan was produced and consulted upon was the one-to-one meeting held by the Steering Group with the Harley estate owners. No special arrangements or secretive meetings of that nature should have been held as the NDP is to be produced by open public consultation, not deals being struck behind closed doors, or actions leading to a perception that such deals may have been struck. I have included these comments on the whole process so that when the time comes the examiner will see that these views were made known to BGPC during consultation and therefore there was time to correct the poor consultation before submission of the plan for approval, if BGPC so wished.	
C2.5 S Jack			My concern regards the infrastructure in this area, namely the roads. As they stand, they are in a bad state of repair, in many places they are narrow, a huge number of large heavy lorries use them, many drive on them as if they are motorways, many properties have bad access and in Adforton there is no footpath on which to walk on the A4110 (it is dangerous now!!). Now all these extra houses, not just in this parish but in other local parishes, will mean much more traffic on them. I understand there is a need for more housing but most of the above will not be addressed. Why aren't more Brown Field sites being utilised - a prime example is the one near Baron's Cross, Leominster.	
C2.6 G Baker			Wholeheartedly support the provision of new housing, particularly affordable housing within the designated area. Villages will die if more housing is not made available.	
C2.7 C Bordewich	Policy BG6		Construction work here would be close to the tributary of the Lugg and should be sensitive to the incredible wildlife in the stream and woodland which would be close by.	
	November HRA amendments - Option 16		There are many accessibility and environmental reasons why Lingen would not be a suitable village for disproportionate levels of development. See general comments that follow.	
	General comments		I broadly support the proposed level of sensitive development in Lingen conservation area, but feel it is important that this wildlife-rich conservation area does not get any extra development beyond its proportional allocation. The 'level of need' for accommodation in Lingen is directly linked to the tranquillity and wildlife here. The village is	

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			remote, and regularly cut off by flooded roads on all access lanes. Many people in the village are either retired or home-based workers for whom transport / access is not a major issue. Those that work outside the village pretty much need four-wheel drive cars that can get through surface flooding if they are to get to work every day of the year! We rely on the air ambulance for emergency healthcare access. The wildlife here is present right in the heart of the village (I have seen a lone male otter, we have ravens, grey herons, welsh red kites, sparrow hawks overhead, and many garden and woodland birds including Lesser spotted woodpeckers, newts, lizards in the garden all within the conservation area, and the list could go on and on and on)- this is what makes it a place where young families might choose to live, even though accessibility is hard and facilities are lacking. The close proximity of woodlands make up for the lack of playgrounds. The dark skies, and quiet lanes are massively important both for residents and for tourists. The banks of the stream further downstream from the village have Early Purple orchids, Greater butterfly orchids and other native wildflowers. Any construction work and development needs to be sensitive and considerate to the wildlife in this area, especially where it concerns the stream and the woodlands.	
C2.8 P Chilman	General comment		I have looked at the plan many times and cannot understand why we are being consulted again as we have already been through this process. I support the plan as laid out and do not feel it needs any changes, we need this modest increase in the housing and I welcome the increased population which will make local services and businesses more viable.	
C2.9 C Bartlett	General comment		Having been to presentations and read the full plan I think it is well thought out and a sensible way to meet our commitments for what is after all a very small increase in the housing in the area. I support the plan as it is and feel it should be implemented without further delay.	
C2.10 G Keown-Boyd			Found document lengthy and uninformative. I wanted to see where proposed houses were to be built. Where are they going to be? I feel that precise location is of crucial importance. Please let me know location of planned buildings & what category they will be - starter, family or retirement.	
C2.11 P Roscoe	Policy L4		The roadside boundary of this site has already been identified as a possible traffic hazard. Consequently, the entire roadside length is bounded by 'visibility fencing'. Any development of the site would therefore have to be restricted to the south west corner of the plot, close to the existing (listed?) buildings. Any increase in traffic caused by regular vehicular access on or near the junction would further increase the hazard at this location. Suggest removal of L4 from the proposed plan.	
	Policy L5		Reduce the number of proposed dwellings from 5 to 2. The report acknowledges that Lingen would be expected to propose the smallest number of new developments within the Parishes. This would amount to a total of 8 or fewer developments. To concentrate the majority of those on one site puts the existing characteristics of the village at	

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	Appendix 1 Page 48		<p>risk.</p> <ul style="list-style-type: none"> • Having established the general principle of maintaining single depth developments within the village, a proposal to make an exception risks creating a precedent. Future proposals for other sites to be similarly developed would be more difficult to object to, the essential character of linear, street facing development, having already been eroded by this proposal. • The report alludes to visual amenity from the roadside and includes proposals to reduce the negative impact from this side. However, it fails to specifically address the visual impact of the 'larger 3-bed units to the rear of the site' when viewed from the public footpaths (beyond a general reference to screening), despite these being acknowledged as important amenities. Development away from the roadside proposals would be particularly detrimental to the character and amenity of the public paths. • This location of this site, a wildlife habitat and adjacent to a waterway, is particularly unsuitable for development at the density proposed. The intrusion on the current environment would be counter to the Border Group Neighbourhood Area Environmental Report (Nov. 2016) which contains relevant detail specifically discouraging development of similar sites: <p>SEA topic 2 - Biodiversity: Habitats and species of national, regional and local importance are under pressure from development Minimise loss of biodiversity and expand opportunities for wildlife everywhere.</p> <p>SEA topic 8 - Soil: Promoting development of previously developed land and buildings as opposed to greenfield sites or agricultural land of the highest quality</p>	
C2.12 P and S Davidson	General comment		<p>We would welcome some new houses in Lingen to:</p> <ul style="list-style-type: none"> ○ ease the housing shortage ○ improve unsightly areas ○ increase village community participation. 	
	Policy BG6		<p>However, the number of houses on the nursery site concerns us as too many houses in one development would:</p> <ul style="list-style-type: none"> ○ spoil the present fairly evenly distribution of houses throughout the village which has developed over the years and is so attractive ○ change the overall view of new housing in context with the surrounding countryside ○ create new traffic problems associated with access to and from the road. <p>Five houses in appropriate plots, as outlined in the draft plan, would be ideal. Any additional houses transferred</p>	

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			from other sites within the parish would spoil the carefully made plan. As owners of cottages adjacent to the nursery site, let to locals, we are concerned about the change to the overall character of the site. Too many houses squashed in, mainly for economic reasons, would have a detrimental effect to the general character of Lingen.	
C2.13 S M Gray	Policy BG6 Paragraph f		To ensure that the new housing development does provide a mix of house types – ensuring that families/first time buyers can afford and be able to purchase houses in the village – that it is 2/3 bed houses that are built to ensure a new generation is able to move/live in the village.	
	General comment		The housing development is to have local people move into the village – how will this be regulated? - as the scheme does not mention this – once the houses are built will they just go on the open market of will there be interaction with the council to ensure locals have opportunity first?	
C2.14 D Thame	Para 1.5		The 2003 parish plan is now historic, and is difficult to rely upon as evidence. There is no reference to the 2011 Housing Needs Survey which is considerably more recent – hence more reliable as evidence. This survey, conducted by a housing association with the co-operation of the parish council, indicated potential demand for 27 homes across the Group Parishes – predominantly low-cost or for rent – in the period to 2020. This ought to be part of the evidence informing housing allocations, both type and scale. Please see comments to para 7.2. Including a 2003 document in the evidence base but excluding a 2011 document seems perverse.	
	Para 1.7		To maintain confidence in the plan, the 5-year review should be conducted with full public engagement – not simply a desk-exercise by the parish council. The plan should state a commitment to public engagement and consultation before a review is concluded.	
	Para 1.12		Delete “and positive” – no indication is given of what those positive “influences” may be, nor is it shown how this is related to considerations of sustainable development. The plan – nor supporting documents – at no point show these influences, so the claim is unsupported by an evidence base. As with BG5 this reads a simply “softening up” for allocating housing to Lingen to make up for the deficiency of deliverable sites elsewhere, regardless of the acknowledged constraints on Lingen.	
	Para 1.19		I draw attention to my Freedom of Information requests.	
	Para 2.7		Please see comments relating to BG5, below.	

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	Para 2.14		This risks looking contradictory. An identical reason (protection against inappropriate infilling) is given for *having* a development boundary in Lingen, and for *not having* a settlement boundary in Brampton Bryan (a decision taken by the steering committee at the explicit request of the dominant local landowner, see Steering Committee minutes 18 November 2015, although the plan does not give this explanation). The result is a policy contradiction that risks being overturned by an inspector. This paragraph would be less vulnerable to challenge – and make more sense - if the same criteria were applied to both villages. Since, in the survey referred to, the residents of Brampton Bryan opted by 44 per cent to 16 per cent, to support a settlement boundary, the best way to achieve consistency is to have a settlement or development boundary for both villages. This offers the best prospect of a policy capable of surviving proper scrutiny and the testing period before the first five-year review.	
	Para 3.2		Sharing the allocation equally between the villages – in effect, an arbitrary allocation – cannot be regarded as a decision based on sustainable criteria (which should respond to local circumstances in a way now fairly well understood by planners). Allocations need to respond to the conditions pertaining in each settlement, as the plan acknowledges (quite properly) elsewhere. Reasoned justifications for the extent of the allocation need to be made.	
	Policy BG4		I understand and appreciate the policy aims, but suspect that without some elaboration and a deeper evidence base this will not survive inspection (see my para 7.2 comments below for what I hope is a helpful approach). The emphasis on the village’s historic character (Brampton Bryan is*not* in a conservation area) contrasts with the more liberal approach to development in Lingen (which*is* in a conservation area). How can this be explained, because in planning terms it is Lingen, not BB, that has the enhanced character status? As with para 2.14 consistency in reasoning as between the villages is desirable (essential). One explanation – with the advantage of being true - is that the dominant landlord does not wish to develop and will not make sites available, and this ought to be relevant and recorded as part of the plan’s rationale. (again, see my comment on para 7.2). I suggest amending BG4 – or the supporting paragraphs – to make this point about the dominant landlord.	
	Policy BG5		Again, consistency with Brampton Bryan is desirable – and it is unclear why Brampton Bryan’s historic fabric should be specially signalled when it is *not* a conservation area, but Lingen’s should go unmentioned as the fundamental starting point of of the policy context, when it *is* a conservation area. It suggests Lingen is to see housing development, regardless of its conservation area status, to compensate for the relative lack of development opportunities elsewhere in the Border group parishes, which would be to allocate additional sites to Lingen to compensate for landlord reluctance, or site unavailability elsewhere. That, too, would be vulnerable to challenge because it would respond to *other areas* development constraints, and not to Lingen’s very different circumstances, as per Meeting Housing Needs. The contradictory approach is perverse and calls the plan’s rationale into account in ways an inspector is sure (rightly) to question. Therefore, amend to reflect the same language as	

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			<p>BG4, so that the policy opens:</p> <p>“Housing needs within Lingen over the period 2011–2031 should be provided in ways that retain the intrinsic and exceptional architectural and historic character of the village and will be accommodated within the development boundaries defined upon Lingen Village Map and in accordance with the following criteria:”</p> <p>Further comments on BG5:</p> <ol style="list-style-type: none"> 1. Para 2.7 very usefully identifies a series of (extremely popular – judging by survey results) design criteria which it is reasonable to apply in a conservation area (even if their applicability might be questioned elsewhere). BG18 is good – see comments below – but maybe amend BG5 to include a new sub-section: “Development will not be permitted that will overwhelm the existing character of the built environment by introducing a preponderance of one type of building style or material.” Maybe adapt BG6 to include this point? 2. Para 2.7 indicates popular support for protecting views which form such an important part of the isolated village setting (especially in Lingen where landscape and village so conspicuously interpenetrate). The BGNP Habits Assessment remarks (Appendix 2, page 3 of 9) that “Any development site or criteria policy for Lingen will need to reflect the historic heritage aspects of the settlement. This could also have an impact on the wider landscape and quality of the surroundings within the area,” and adds “Additional criteria safeguards could be positively addressed within the accompanying policy wording.” This opportunity should be taken to expand clause (d) which simply refers to “setting” – see comments on BG16 and BG18. 3. The Habits Assessment (appendix 2, page 6 of 9) notes of Lingen: “Criteria may be required with regards to development proposals within Lingen to ensure that water quality issues are taken account of.” There already concerns about the consequence for Lingen Brook of existing development – I have no personal knowledge, but others claim to have. The upper Lugg – designated a European Special Area of Conservation (SAC) due to the rare species - is already seeing rapid growth of phosphate levels beyond that set by relevant agencies (up to seven times that indicated by the Environment Agency). This evidence should be cited and the plan should be amended to include a new sub-section to ensure water quality is not endangered by new development: this is a technical area, so I hesitate to offer amended wording, but I am happy to help research and help draft appropriate wording, if that would help the steering committee? 4. Clause (a) says that “With the exception of the area covered by Policy BG6” various criteria applied. I wonder if might be wiser (and more useful?) to say that “with the exception of any development of five 	

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			houses or more covered by Policy BG6.” This would allow for meaningful guidance on what, if they happen, would be large developments in the context of a very small settlement protected by a conservation area, such as Lingen. Policy BG6 could therefore be extended to *any development of five houses or more* – because we have no way of knowing what would happen on other potentially large development sites like The Turn, for which the NDP ought to make sensible provision (as it does for the Nursery).	
	Para 3.11		Strongly support, and I should not like it to fall through lack of a supporting evidence base. Point 2, above, might be mobilised here to improve the evidence base: a landscape character assessment/ landscape and visual impact assessment, either formally, or through those with strong professional backgrounds in landscape and buildings? Please note that another Herefordshire parishes attempt to establish a distinction between green spaces and development spaces fell through lack of evidence.	
	Para 3.12		As above, para 3.11. Strongly support but the evidence base perhaps needs strengthening. Assertion isn’t enough, probably.	
	Policy BG9		Support, but it feels a bit cut-and-paste, as if this does not respond specifically to the built (and landscape) environment of our villages, but to good design more generally. Identification of what we take to be the “locally distinctive features” would make this more robust: for instance, building heights are generally low, with a low roof line, even in two storey properties; rooves are generally of slate; properties are invariably equipped with chimneys or suitable flues; predominance of painted or plastered facades; fenestration occupying a relatively small proportion of façade area; no doubt there are others?	
	Policy BG16		Unless I’ve missed it, neither in BG16 (b) nor elsewhere does the plan say what important views entering and leaving the Lingen conservation area it intends to protect, and without this the landscape character protection is extremely vulnerable. For instance, it is characteristic of Lingen – see the Pevsner guide to Herefordshire, which can be cited as evidence? – that the wooded hillsides project down into the village and can be seen from the main village street, and therefore a consistent view of Lingen Vallet Wood and Oldcastle Wood from the main street, are important; should we not identify that as a protected view? The clarity of the southern approach is determined also by the visibility the two woods and Harley’s Mountain, and their close penetration of the village. Likewise, views from the church of Lingen Vallet Wood. I don’t pretend to know how best to express this or to accomplish it in planning terms, but I’m happy to explore if this will help the Steering committee?	
	Policy BG18		Strongly supportive but can we add to point 3: to protect, as a unique defining feature of the Lingen Conservation	

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			<p>Area, the wide 90 degree views of the church from the surrounding hill, and the views from the church of the hills.</p> <p>Can we strengthen point 5 (in the bold text) to emphasise the close proximity of woodland to the village, and the visibility of that woodland within the village (from the main street), as essential to the character of the settlement?</p>	
	Para 7.2		<p>The plan is insufficiently explicit on the nature of the constraints effecting the delivery of the plan.</p> <ol style="list-style-type: none"> 1. The major local landowner, who owns all but a handful of plots in and around Brampton Bryan, and also owns the bulk of two other parishes, does not propose to develop in Brampton Bryan – perhaps the only location in the Border Group parishes that has public transport, an A-road, access to public facilities in both Knighton and Leintwardine which make it suitable for younger families, and is not subject to flooding, nor constrained by a conservation area. You can't say this of anywhere else and yet the plan is unable to allocate new build to Brampton Bryan – due to the landowner's decision. 2. Adforton – which is also on an A-road, is also close to public facilities in Leintwardine and Wigmore, and also enjoys a limited public transport connection, is constrained by its topography. The lack of level sites is acute. Again, a village that might suit new build to meet Herefordshire allocations is unavailable for reasons outside the control of the parish council 3. Walford – within walking distance of facilities in Leintwardine, on an A-road and with access to public transport, might also make a feasible new build development site. Here flood risk severely constrains options, whilst development beyond a very modest scale risks run-off difficulties. 4. Lingen is acknowledged in the plan as the least sustainable development location in North Herefordshire (see Meeting Housing Need paras 4.10-4.12), is constrained by flood risk in the area roughly south of the Royal George, has no public transport, is not on an A-road and is either a six-mile roundtrip by a single-track road, or an 11-mile round trip by a mostly two-way road, from a pint of milk. It is a conservation area, with special environmental features to the south and linked to the river Lugg (again, see Meeting Housing Need). Whilst there is scope for development on a handful of mostly infill sites, these are limited in capacity. 5. Housing need – as identified in the 2011 study – is real. Despite the constraints identified above, the BG NDP manages not only to meet the (quantum) needs identified in the 2011, but the exceed them, indicating a willingness and a determination to meet, with a relatively wide margin, established and demonstrable local need. 6. An area as isolated as the Border Group parishes, and as particularly isolated as Lingen is, being without public transport, not on an A-road, no facilities, and no jobs, cannot be regarded as an area for the encouragement of inward migration if sustainable development is to be the objective. The plan already identifies housing for local needs as a priority, and long-distance commuting is undesirable for social as well as environmental reasons and not supported by the Herefordshire Plan. Recent evidence of house sales suggests demand is, in any case, thin as potential inward relocators opt (increasingly) for urban or semi-urban life offering the health, education and leisure facilities – and urban vibe – which has been an 	

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			<p>increasing feature of popular housing tastes in the last ten years. Retiring to the country is no longer the popular or desired options it once was.</p> <p>The conclusion is that it is almost impossible to deliver the quota of housing allocated under the Herefordshire Plan, and that delivery within the plan boundary is severely constrained and will always remain severely constrained. The 36 dwellings identified in Meeting House Need para 5.2 (Table 2) are – after a canvas of sites, evidence for which will need to be provided, and analysis of the results made available - the extent of deliverable capacity, given these constraints of what can be provided. In these circumstances, it is possible to argue that an additional housing allocation beyond 36 new dwellings can and must be met during the first five-year period by those neighbouring parishes with capacity (Parishes in Shropshire have moved in this direction, I believe). I am happy to research and explore this issue if it helps the Steering committee. Evidence of site canvas and selection, and the criteria used, is vital if this is to survive inspection.</p>	
	Appendix 1		Generally, very supportive.	
	General Comment		<p>The NDP process is complex: one wonders whether the idea of NDPs is feasible for small communities – or perhaps any community. The scope for meaningful public engagement on matters of some complexity is limited – few of us have any planning knowledge, even fewer have the time or capacity to devote to reading and comprehending complex and lengthy documents. – leaving the process in the hands of well-resourced developers or those with a direct personal or financial interest in sites to be developed. Volunteers involved deserve applause and thanks. If I have misunderstood anything, I'm happy to be corrected; if the plan already answers my concerns, I would be delighted to hear it.</p> <p>I recognise that the plan is walking a fine line in attempting to clear the way for appropriate development but recognising the constraints. However, I fear that without detailed site assessments based on rational and clearly-stated criteria – assessments of those sites selected, and those rejected which this plan lacks, and are not provided as part of the supporting evidence base – an inspector will judge it harshly.</p> <p>I fear that without an improved evidence base, settlement and development boundaries stand small chance of surviving inspection. And without more detail, those landscape, building design, conservation zone and character protections it does offer will turn out to be relatively worthless.</p> <p>In other words, if the plan is to adopt its current balancing strategy, it needs more evidence to survive inspection. The alternatives are to abandon settlement boundaries etc. on the one hand (which I would not support), or to make a more thoroughly evidence-based claim for their significance (which I would support, and have suggested some ways of honestly addressing the constraints).</p>	

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C2.15 J Walker	Para 1.4		Where and when was discounting alternatives decided?	
	Para 1.5		On a number of points the Draft NDP differs from the Residents' Needs Survey.	
	Para 1.8		Change to: "four of six parishes"	
	Para 1.9		Adforton - no mention of the principal issue is that it sits on a steep hill surrounded by open countryside (other village have the A4110 pass through). Also Letton Lane (one of the few areas for expansion) is very narrow with little space from pedestrians, parking and passing places.	
	Para 1.10		Delete Civil war and Doomsday references and add: "rare example of a Commonwealth Church" and "the landscaped Deer Park" as notable features.	
	Para 1.11		What positive influences?	
	Para 1.12		Secondary area is not separate but contiguous just accessed from a different road.	
	Para 1.15		Add "employment" to "services and facilities". Without analysis of employment patterns and opportunities hard to envisage sustainable development (it would imply long commutes, which the Herefordshire plan discourages).	
	Para 1.16		What attendance and feedback was there from the consultations in Dec. 2014? How did this feed into the Plan? Don't understand the last sentence.	
	Para 1.17		What evidence is there that these consultations supported the general direction? How many responded? How many from landowners or developers? How many from ordinary residents?	
	Para 2.2		Why is increasing the supply of houses the number on objective and maintaining the character the fifth? These all seem to be very specifically worded objective which don't directly relate to the Survey results.	
	Policy BG1d)		It is not clear that development should not increase danger (resulting from traffic) where safety measures cannot be pursued.	
	Policy BG2 e)		Change "broadband" to "communication (broadband, telephone, mobile, etc.)"	
	Para 2.5		Change: "proposals are advanced in order to meet the "needs of....". Correct the punctuation in this paragraph.	

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	Para 2.6		No mention of the actual housing demand and what housing would be suitable to satisfy it? Where is the evidence base?	
	Para 2.8		What is the evidence?	
	Para 2.10		What relevance does this have for neighbourhood planning?	
	Para 2.11		What does this mean?	
	Policy BG2		Add "Border" to "Group Parish" for consistency.	
	Policy BG2 bullet point 3		Add "(see Policy BG6)" to the end.	
	Para 2.13		How is brownfield to be defined in a rural context? Does it include agricultural land, working buildings or agricultural tenancies? How many identified sites are brownfield?	
	Para 2.14		What protections are there against dense infilling and suburban estate form, such as a Close? How was the decision not to have any boundaries for Brampton Bryan agreed and how does this relate to the survey? Could the title for the webpage referred to in Footnote 3 be stated and is the web address permanent?	
	Para 3.2		Why is it best to share provision equally? This is to adopt an arbitrary criterion, rather than responding to the constraints and opportunities in each settlement, and therefore cannot be judged a sustainable approach to development	
	Policy BG3b)		Why three bedrooms in Adforton?	
	Policy BG3c)		As density and massing in Adforton is already very high (with little or no space for parking or views out into the countryside) would it be better to suggest new development should be less so to meet modern demand for parking and green space - especially for families? What does "adversely affect the amenity" mean in practical terms?	
	Policy BG3d)		Add: "work-live units"	
	Policy BG3		There isn't any protection for the heritage assets of the village including their setting or for green space or incorporating parking into overall design. (see BG5)	
	Para 3.5		How do you get a mix of types and tenures by only building certain family homes?	

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	Policy BG5a)		How far is "unreasonably into the plot" - especially where neighbouring building are set back or where they run in different directions?	
	Policy BG5		Why no mention of the number of bedrooms unlike other Policies.	
	Policy BG6		Why two and three bedrooms? Should waste disposal be included? We should explore how live-work units could be created on this site.	
	Para 3.11		Delete ", as does Adforton,". Lingen is completely split by the Castle, Church and fields to Lingen Vallet Wood.	
	Para 3.11		Change to: Lingen is the most remote of the Group Parish's villages. Only minor roads provide access to the village and these are particularly narrow. Much of the village is designated a conservation area characterised by small scale development which does not extend in depth away from the road frontage. It contains no modern suburban housing estate. A Scheduled Ancient Monument is located at its northern end. Its eastern edge comprises land at risk of flooding. To the south of the village land is shown as a Special Wildlife Site. The brook flowing through the village is similarly designated and this flows into the River Lugg which is an SSSI and later a Special Area of Conservation. There is no public sewer or sewage treatment works and consequently there remains concern that a precautionary approach should be taken to the level of any development in the village in order to protect the water environment and contribute towards the River Wye Nutrient Management Plan. The village is considered the least sustainable location for further housing of any settlement in north-west Herefordshire for the above reasons although would support some limited development that serves local needs, retains or enhances the conservation area and makes a contribution to the wider needs of the Group Parish.	
	Para 3.12		Add protection to the small paddocks and parcels of land which allow villagers to earn income from smallholding close to their houses. This should be part of home working as many residents already do. It would also allow people to keep horses for leisure.	
	Policy BG8		Where is this likely to happen? Do we need any further protections to make sure this housing does no undermine provisions elsewhere? Could we have large developments in open countryside or just outside village boundaries?	
	Policy BG11		Do we need make sure that other technologies which are as important as Broadband is now are included in development up to 2031?	
	Policy BG12		What about solar farms which may have similar adverse effect as wind?	
	Para 7.6		Any review should require BGPC to proactively consult with the community including the villages affected and	

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			insure the maximum amount of participation.	
C2.16 D Driver	Policy BG18(4)		Lingen's strength is its architectural variety. It has virtually every style from 1400's to 1960's council houses. With the exception of conversions and the Old Nursery house we have no new architecture. Development has either been retrogressive timber frame or country pastiche. New development should embrace new technology and design to produce architecturally interesting and energy efficient homes. This can be delivered at affordable price points with careful planning and design. Existing materials are incredibly varied within the villages and new development should reflect this. It should also be noted that Lingen has only had 13 new homes created in the last 35 years so if we take on a quarter of the proposed 44 - 11 more in five years will be more than enough.	
	Highway safety		Another major concern that is mentioned in the plan but contravened by some of the proposed sites in Lingen is that of road safety. The site on the corner opposite The Court House is blind to traffic and extremely dangerous. This would also apply to any consideration of a site near the Old Post Office.	
	General comment		Blocks of development should perhaps be limited to 6 dwellings to avoid mini estates. As Lingen is described as "one of the least appropriate villages for development" in the plan, any development proposal should be given great scrutiny.	
C2.17 B Sheppard	Page 17		I don't understand where the target of 44 comes from. The target 2011-2031 is set at 36 dwellings. The paragraph 3.1 then goes on to say that once the rural windfall has been taken into account this leaves 28 dwellings. The point is that it is not very clear just how many houses need to be built. I would also point out that from what we have seen in Lingen over the last few years, houses have not exactly been selling fast. I would question what is the level of demand to live in this village? There could be a very real risk of building something that no-one wants, and we are left with an expensive (financially, environmentally and socially) white elephant.	
	Policy BG6		No mention is made here of environmental protection other than noting the flood risk. What about sewerage and the risk of getting into the local watercourse? The rivers here are in the Wye catchment and the water table is close to the surface, so ground water contamination is a real threat. Care should be taken to ensure that there is no detriment to local flora and fauna including amphibians, reptiles, mammals (inc. otters) or plant life and that steps are taken to ensure their protection. The local geology also demands that care should be taken when excavating any Silurian fossil deposits. Any development here must be of a sustainable nature, however it is difficult to see how what is proposed – ie several dwellings, is sustainable.	

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	General comment		<p>Reading through “Regulation Draft Plan v2 September 2016” in general I agree with what it says. As a whole it seems to be a reasonable and sensitive plan – <u>if that is stuck too</u>. However there seems to be no specifics on pace of development other than for Brampton Bryan where it suggests that “potential <i>for some 8 dwellings in Brampton Bryan.....although this is anticipated to be towards the end of the plan period</i>”. If this is relating to barn conversions, why the need to wait for 15 years? As noted below a conversion is surely a preferred option anyway.</p> <p>This plan is until 2031, with a review in 5 years. I don’t understand how the target of house building has been arrived at in the first place, but with no sign of any demand for housing of the size and type proposed to built – there remains unsold examples in Lingen – why not wait until review or until there is demonstrable demand?</p> <p>People generally do not want to move to areas which are inconvenient, lacking in local jobs and services. Somewhere like Lingen is essentially quite remote – no shops, no services, no mains drainage. People need to be self reliant. Lingen is off the beaten track surrounded by roads that regularly flood – a 4x4 is all but essential. Any flooding in Walford or Brampton Bryan for example also cuts off Lingen along that route. Lingen is five miles from the nearest shop, and even further from the nearest Station or public transport and further again from the nearest emergency care – a 50 minute drive to Hereford with a sick/injured child is no fun I can tell you, which is why my wife completed an emergency paediatric first aid course. It makes more sense to build where there is demand and less local resistance. Nine extra dwellings in Leominster for example would barely register, but in any of these villages will make a huge difference. In Lingen it will put a huge and irreparable burden on the community and the environment.</p> <p>I would re-iterate the point I have made above – i.e. Lingen is singled out as the Village LEAST suitable for development due to lack of services (mentioned above), infrastructure (main roads, transport etc), environmental concerns (Lingen is on a very sensitive watercourse catchment area – the only village under consideration that is mentioned as such, with diverse and sensitive flora and fauna as well as being home to some fine Silurian fossil deposits), small size and having a conservation area. The conservation area must be respected as it is fundamental to the character and form of the village.</p> <p>As far as the village character goes – Lingen is fairly linear village – any development should be in keeping both in house form and style – i.e. BG5 and BG18 in the regulation draft plan v2.</p> <p>Looking purely objectively, and assuming a target of 7 houses per village is eventually agreed upon (based on the 28 figure) it should also be agreed that each village builds at the same rate to prevent any one village being disproportionately developed, thus evolves more naturally. This will also guard to some extent against any future changes in legislation. This would amount to about 1 dwelling per village per 24 months – a rate that should be adhered to, and one that I believe will not be overall detrimental, going some way of preserving the character of these villages.</p> <p>A slow steady approach is the only sensible, sustainable and fair way to achieve what has been thrust upon us.</p>	

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			Additionally preference should also <u>always</u> be given to conversion of existing buildings over breaking new ground. Such reuse is clearly more sustainable, having a far reduced impact on the environment as well as the look, feel and dynamic of the villages in question.	
	HRA. Appendix2 pg4/5 opt 15/16/17		Lingen is singled out as the Village LEAST suitable for development due to lack of services, infrastructure (main roads), environmental concerns, small size and having a conservation area. Why in that case do ALL the development options include Lingen? Where is the logic in that? Anyone looking at this objectively would see that to be the case. Clearly the only sensible, sustainable option is divide the development proportionately between the settlements.	
	HRA. Appendix2 pg3/4 opt 10/11/13		European sites potentially affected – as it is stated that these villages do not fall within Lugg or Clun catchment areas, development will NOT affect the Clun or Wye SAC, unlike Lingen which will. This must be changed.	
C2.18 G Clark Planning Consultant, Berry's on behalf of client	Para 3.7		<p>This paragraph refers to land at the western end of Adforton which client would propose for housing within the NDP</p> 	
C2.19 C Moore	Housing general		The overall housing figure for the parish itself is excessive	
	Housing in Lingen		Whilst every village has to grow through its quantity of houses, it seems excessive that Lingen is taking the majority of the allocation, especially as the plan itself states: Lingen is the <i>only village</i> to not be on a main road, the <i>only</i>	

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			<i>village to have a Designated Conservation Area to its centre and compared with other villages is relatively inaccessible.</i>	
			The plot called in the plan 'The Nursery Site' which is within the <i>Lingen Designated Village Conservation Area</i> gives the greatest concern with the quantity of houses it is mooted to accommodate. This proposed housing development is earmarked for eight (<i>not</i> including the house already in situ) medium family houses of up to three bedrooms and whilst instantly unbalancing the overall population here in Lingen, this intense building on the nursery site would also be totally out of keeping with the village. At the same time its effects would immediately have grave consequences for those living adjacent to the proposed site plus it would seriously affect the outlook of the adjacent properties. Such proposed excessive building as this would also negate the development plans criteria for building, as the plan itself states: dwellings should complement the character of the village, especially being in scale with the general density of existing properties in the vicinity; and that: development important views, vistas and panoramas, in particular into and out of the <i>Lingen Conservation Area</i> .	
			I support and very much welcome the plans proposed outline of small building plots dispersed throughout Lingen village which will keep the feeling of space and is much more in keeping with its character therefore having the overall effect of enhancing the village's appearance. These plots will also have the advantage of giving smaller scale much needed housing for future parishioners and their families whilst hopefully, supplying new members of the community whom would take an active part in its Chapel, Church, Village Hall and in village life itself.	
			Lingen is a very small village full of character which has naturally transpired over hundreds of years along with its views and vistas and I sincerely hope the plan executes its statements of preserving those qualities at all costs, not only for those whom are already residents but also for those that wish to come to Lingen and call it "home".	
C2.20 T and C Dixon C2.21 V and J Richards C2.22 C and P Brady C2.23 C and D Fraser C2.24	Policy BG7		Walford was correctly identified in the preamble to the plan as a hamlet, with no anticipated potential for further house building, particularly given its propensity to extensive and regular flooding. At some later stage in the process, Walford was 're-defined' as a village (which patently it is not, as it has no parish church- there is nowhere even to display the draft plan) and it was 'identified' as having development potential for housing. To support this contention, a completely arbitrary 'settlement boundary' was devised, which outlines the existing houses, except along the Lingen road, where it bears no relation to any physical characteristics in the vicinity. Specifically, there is no justification for placing the boundary to the west of the Lingen Road. No attempt was made to advise the Walford residents of these draconian changes to the plan, for reasons which remain unclear, so the suggestion in the text that the plan is based on consultation with local residents is, in the case of Walford, wholly incorrect.	
	Policy BG7		As presently configured, the plan envisages a scheme of eight houses to the west of Lingen Road, and two to the east, a total of ten units <i>plus</i> any infill sites available. This represents twenty-five per cent plus of the entire housing	

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L Clothier and P Eades C2.25			requirement for Border Group, which is clearly grossly disproportionate given that Walford (having only twenty one dwellings) is half the size or less of the any of the three actual villages of Lingen, Brampton Bryan, and Adforton (which average over forty).	
J Maxwell C2.26 A and A Grimley C2.27 A and C Gloag C2.28 K Kennedy C2.29 S Vernon C2.30 D and H Hodgkinson C2.31 R J Price C2.32 S Wynne C2.33 A P Davies C2.34 M J Abbott C2.35 S and D Jones	Policy BG7		<p>These proposals fail to achieve any of the stated principles of the Neighbourhood Plan, and represent exactly the type of inappropriate isolated discordant housing development which Neighbourhood Plans are supposed to prevent.</p> <p>a) Planning- the main site is isolated and on a ridge line surrounded by open agricultural land. It would therefore be visually intrusive in a landscape of significant natural beauty. It would be skylined on the approaches to Walford, particularly from the east, south, south west, and west, thus presenting a significant blot on the landscape, and one which is wholly unsympathetic to its locality. The density of the scheme, representing a fifty per cent increase in the number of dwellings in Walford, is grossly disproportionate. The scheme fails to comply with any of the five stated criteria of the Plan, being to: - provide accommodation for the elderly and young families (now accepted as non-deliverable); encourage industrial development; increase road safety; increase access to health and education facilities; and be sympathetic to the character of the local landscape. Indeed, it actively militates against them.</p> <p>b) Environment- Unlike Brampton Bryan Adforton or Lingen, Walford has no facilities whatsoever; no church, pub, shop, or hall; there is virtually no bus service. Whilst market demand for housing is not necessarily a planning criterion, a Neighbourhood Plan must seek to satisfy actual demand, not merely be construed to fulfill some arbitrary administrative target. The market evidence shows that there is little or no residential demand in Walford, which is unsurprising given its complete lack of facilities and propensity to flooding. There are currently two long term empty dwellings in the hamlet; two houses still on the market after several months and over a year respectively; and the last two houses to sell were both on the market for over three years before a purchaser could be found.</p> <p><u>Flooding</u> The Plan acknowledges that almost the whole of Walford lies within Environment Agency flood risk zones 2 and 3; and flooding on both the A4113 road junctions is sufficiently severe to close the roads regularly, as it does in the Lingen direction at Stoneybridge. Thus, while the location of development on the ridgeline may avoid direct flooding, the area will be completely cut off from time to time. More seriously, such development will generate substantial hard surfacing which will significantly exacerbate the existing run off into the adjoining areas. This is particularly severe in the adjacent lane on the eastern side of the Lingen road, where some properties already have to run continuous pumps during even moderate rainfall. A recent High Court decision found a planning authority liable in damages for collateral flooding resulting from permitted development in a known flood risk area, and the Environment Agency has issued a severe caution on proposing or granting planning permission in these</p>	

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			<p>circumstances. Indeed, it seems to us bizarre and erroneous to seek to encourage any development in the worst location for flooding in the whole of the Border Group parish.</p> <p><u>Highways</u> Although the Lingen road is unclassified, it already carries significant volumes of both agricultural traffic and commercial vehicles cutting through to Presteigne from the A49 at Bromfield. At the Walford end, the carriageway is too narrow for two large vehicles to pass each other, and there are no pavements for pedestrians either here or on the main road; nor any opportunity to create them due to existing hedge lines and the proximity of existing houses to the roads. The river bridge immediately on the A4113/Lingen road junction is single lane only, and already presents a dangerous conflict between vehicles turning off the A4113 and those approaching from the Lingen direction. The proposed development would significantly exacerbate this danger to an unacceptable degree, due to the number of additional vehicle movements which it would generate (see comments under Parking below).</p> <p><u>Parking and Deliveries</u> The current parking standard appears to be two spaces per dwelling, but, as the Roman Close scheme in Leintwardine so painfully demonstrates, this is hopelessly inadequate in a rural area where there is little or no public transport (this situation is even worse in Walford than it is in Leintwardine). In reality there can be five car owner/users per dwelling, requiring yet more hard covered areas. Traffic volumes are also increased by the number of van deliveries (currently ten to fifteen per day in Walford) generated by the complete lack of any local facilities and the journey of over twenty miles to the nearest main shopping centres (Hereford and Shrewsbury).</p> <p><u>Site Restrictions</u> The proposal appears to ignore the fact that the Elan Valley to Birmingham trunk water aqueduct, which supplies up to three hundred and forty-five million litres per day, passes directly through the site. At this point it is at a relatively shallow depth as it prepares to cross the river Teme, so any development of the land above would pose threats of physical disruption and potential contamination. The relevant water authorities do not appear to have been consulted.</p>	
	Policy BG7		<p><u>Alternative Sites</u> Given the disabilities which apply to the whole of Walford, the conclusion should be that there is no significant capacity for further residential development in this location, which is certainly the least suitable of any within the Border Group parish (and was so recognised in the original proposals). There are already two proposed infill/conversion sites, at Stoneybridge Farm and Birtley which are not included in the 2016 Housing Needs report. The plan also envisages industrial development of the farm barns in Walford fronting on to the A4113. The rear set of buildings are on raised ground above the flood plain, so these could provide work to live units. Further afield there are much better sites, such as the field opposite the Aardvark scheme in Brampton Bryan which should be considered. Furthermore, the County Core Strategy plan requires only thirty-six dwellings in Borders Group parish,</p>	

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			not the forty-four which the draft plan seeks to impose. Thus, the official target would still be achieved without the Walford proposals, which should be deleted in their entirety.	
	Policy BG7		Appendix 1 of the Herefordshire Core Strategy Policy RA2 lists four specific criteria for promoting housing development in rural settlements (see attached document). The Walford proposals in the current draft plan fail in all four categories, and do so fundamentally. They are unacceptable to the residents of Walford (see below) and should be removed from the plan for it to retain any credibility as a competent and acceptable basis for future development within the Border Group Parish	
C2.21 V and J Richards (Additional comments)	General		No demand. (Walford) not a village but a hamlet lacking facilities. Would lead to increased traffic from Lingen Road onto the increasingly busy A4113. Totally unsuitable site.	
C2.22 C and P Brady (Additional comments)	Policy BNG7	Objection	The whole of the village is in a flood plain and extremely sensitive to any changes in its environment. The building of new houses would create a significant increase in water run-off which would exacerbate the flooding of the low surrounding area, particularly in the small back lane where the houses of The Grange, The Motte, Walford Court, Fold Cottage are situated. Walford does not have a sewage system and then problems of pollution from then overflow of septic tanks is a significant health hazard. The hamlet does not have any amenities to support further housing development. There are no schools, regular bus service, food shops, community centre, parks, churches, pedestrian pavements for safe walking. It is not a suitable area for development.	
C2.25 J Maxwell (Additional comments)	Paragraph 2.3, Policy BG1(c)		The development is bound to detract from 'features supporting tourism'. Tourists come for peace and countryside	
	Policy BG1 (d)		The development will increase traffic on the lane to Lingen, which in part is single track, specifically by the bridge at the junction with the A4113.	
	Policies BG2 and BG7		Although the new properties will not be at risk of flooding, the risk to the rest of Walford would increase when fields, which now can absorb some water, would be covered with buildings. Some Walford properties have been badly flooded in recent years. All have trouble getting house insurance at reasonable rates.	
	Policy BG14		This clause says that 'No development will be permitted that will result in increased flood risk to properties elsewhere'. The proposed development is clearly at odds with this clause.	
	General		Throughout the document, except at the beginning, Walford is referred to as a village. A village is defined as a settlement with a parish church, which Walford does not have. The only amenity in Walford is a post box, access to which, for most people, entails a dangerous walk along then A4113	

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C2.27 A Cloag (Additional comments)	Policy BG1		Define sustainability. Point d) Roads do not meet current needs. Point e) has no meaning.	
	Policy BG2		Walford said to be a village while in para 1.9 it is a hamlet and a village again in Policy BG7.	
	Paragraph 2.14		How can 43%-44% constitute 'most residents'. What does 'exceed to a limited extent' mean? Does it exceed or not?	
	Paragraph 3.2		Line 2 to line 5 is a complicated sentence. Four settlements are called four parishes. Sizes are compared in this paragraph. Walford it would seem is smaller than the other three and yet has a greater number of dwellings ion its rural area. So if the plan goes ahead the Parish of Walford would have even more dwellings than the other three, and yet fewer facilities, a greater flood threat and an inadequate bridge.	
	Policy BG3		There is no mention of 'safe and convenient access to public roads by cyclists and pedestrians.'	
	Policy BG5		There is no mention of 'safe and convenient access to public roads by cyclists and pedestrians.'	
	Paragraph 3.15		What is meant by 'Main Road'? The A4113 or the Lingen Road? Neither have a pavement	
	Policy BG8(ii)		Note 'Development within a hamlet' Is this why Walford is a village?	
	Policy BG13		Councils are struggling to provide public transport so that is an aspiration. Point c) – increased housing will increase road traffic.	
	Paragraph 5.3		Weasel words	
	General		<p>Since the local council is strapped for cash our local roads. Lanes and bridges are poorly maintained and barely adequate for current usage by even larger farm and haulage vehicles. Walford farm lane is badly eroded by rivers of water flowing down it from the Lingen Road. This will increaser with extra hard standing, rooves, etc. The recent increase in traffic along this lane has resulted in the junction between it and the Lingen Road becoming badly damaged. With no cash for repair</p> <p>Most of the principle objective and guidance targets can be met outside of the Border Group of Parishes by building in Leintwardine where young families can walk to the school, shops and medical centre. Old people can have easier access to the shops and age appropriate clubs for company.</p>	

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	Environmental Report		<p>Para 1.2 – Only one site is proposed – Lingen.</p> <p>Para 1.5 – an SEA required</p> <p>Para 1.10(1) - This might be interpreted as no road development etc. lest the rural character be lost.</p> <p>Para 1.10(2) – Local crops for energy is unrealistic</p> <p>Para 1.10(3) – How can an increase in housing numbers achieve any of the aspirations of this paragraph?</p> <p>Para 1.10(4) – As above</p> <p>Para 1.13 – Has this plan been adopted yet?</p> <p>Para 3.5 – Last bullet point. HRA Screening. There is no mains drainage.</p> <p>Appendix Task B3 policy BG7. This seems to be blank</p>	
C2.29 S Vernon (Additional comments)	General		<p>Particularly concerned about highways with the build-up of traffic at the junction of the A41134/Lingen Road. Vehicles, often heavy in nature sometimes come to a halt on the A4113 as they wait to exit onto the Lingen Road. This is caused either by the narrow river bridge, or occasionally flooding, or both. Stationary vehicles here are at risk from traffic that is often fast moving in a westerly direction, despite the recently installed 40mph speed restriction. Currently it is dangerous to walk along the A41134 near the junction with the Lingen Road, due to speeding and often heavy traffic and lack of pavements. The proposed development will not make the situation any easier.</p>	
C2.34 M J Abbott (Additional comments)	Policy BG7		<p>Walford has no amenities or pavement except for a small stretch on the A4113. Any development in Walford would increase the impact on the two junctions on the A4113. No children are entitled to a free primary school bus with both Wigmore and Leintwardine being under 3-miles distance. Therefore, school runs would impact on both junctions. Walford has greater number of agricultural vehicles moving through it which increases the danger of these junctions. Recent developments in Leintwardine highlight the lack of sympathy to the local use of materials resulting in more intrusion on the landscape. Uniform developments increase this intrusion.</p>	
	General		<p>I do not object to building houses but understand what is required of a development, how local people would shape that development is paramount.</p>	
C2.36 S A Barnett	Housing		<p>Asks for plot of land which is owned to be taken out of the NDP</p>	
C2.37 M Morris	Policies BG5 and BG6		<p>In order to complement the character of Lingen village, the proposals for sympathetic development seem strong.</p>	
C2.38 C Shurmer	General/Housing		<p>A good plan in general. 44 houses spread over the Border Group area sounds sustainable to me..</p>	
C2.39 A Thomas	Housing		<p>The plan should explain that affordable housing cannot be insisted upon, so that self-build is the only way of achieving affordable housing from local people, and therefore should be a priority in the plan.</p>	

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	Section 6		There should be a distinct policy on noise pollution	
			The policies on flooding, protection of the landscape/ecology/environment, design and the Conservation Area are strong, so it is a good plan.	
C2.40 H, J and J Thomas	Housing		Self-build should be heavily prioritised as the only way to achieve affordable housing for local people, otherwise the strong community aspiration to provide housing for local people will be frustrated.	
			We support the allocation of the Core Strategy 44 houses roughly equally between the four villages and would oppose any change	
	Live/work units		It should be explained that three sites for live/work housing units have been identified in Lingen, on the edge of the Conservation Area, so as to reduce visual and other impacts on the Conservation Area.	
	Section 6		There should be a separate policy on noise pollution, given the strong value placed on tranquillity by the community.	
	General		With clear, strong and effective policies on flooding, the environment and Lingen Conservation Area, this is a good plan. Attach a list of spelling, grammar and other corrections.	
C2.41 R Parry	General		We support this plan. Lingen needs more houses	
C2.42 B D and M H Kitchen	General		The draft NDP appears to be sustainable but I would suggest an emphasis on local family need before builder's development sites.	
C2.43 M Bedford	General		A good plan	
C2.44 B Thomas	General		The plan will allow the building of a fair number of houses for people and young people in the local area in an environmentally sustainable way.	
C2.45 M Rowley	Section 6		We are in favour of a policy safeguard against noise pollution	
	General		Wholeheartedly in favour of this plan. Local families need provision for housing and within these parameters village character can be preserved and enhanced.	
C2.46	Section 6		We would like there to be a specific policy on noise pollution	

Respondent Identification Number	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Suggested Changes Parish Council Consideration (In blue)	Proposed Change Number
J Robinson and L Wright	General		We are both in strong support of this plan.	
C2.47 S Rogers	General		A good plan	
C2.48 Mr and Mrs G Rowlands	General		A good plan	
C2.49 G Bengree and D Lambert	General		A sound, fair and balance plan	
C2.50 L Singer	Para 2.17		My preference would be for only sites of up to 34 buildings. I do not believe Lingen nursery site should be allowed to be much bigger than this	
	Policy BG18		In addition to that which is stated I believe the avoidance of noise pollution should be considered to retain the tranquil nature of the village.	
	General		I agree with the general policies on environmental protection, flood prevention and the need to provide greater housing for local families. I also believe buildings should be in keeping with the local vernacular and where possible self-build.	
C2.51 S King	General		I support the Plan	
C2.52 Mr and Mrs W A Simpson	General		In agreement with the proposals	
C2.53 K Jackson	General		I support self-build by local young people.	
C2.54 D Coleman	Policy BG1(a)		I strongly support the high priority to be given to promoting new homes to meet the needs of local people.	
	Paragraph 2.6		Comments in this paragraph all very sensible	
	Paragraph 2.13		New development should be on 'brownfield' where possible.	
	Paragraph 2.17		Sites for 3-5 dwellings more sensible, but plots big enough for just one OK	

Respondent Identification Number	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Suggested Changes Parish Council Consideration (In blue)	Proposed Change Number
	Policy BG1(e)		Improved broadband very desirable. Mine is really slow.	
	Policy BG5		All sensible. Sympathetic consideration shall be given to a new dwelling for a family member (e.g. an adult child) on the same plot if it is big enough.	
	Policy BG6		All sensible	
	General		Sensitive and sensible proposals	
C2.55 S and R George	General		Agree with Walford residents concerning the proposed building. We have a holding tank within 10 meters of our back door and any extra surface water will counteract our efforts to contain the flood problem over the past 4 years. We have no village hall, no pavement, no bus route and no mains sewerage.	
C2.56 Mr and Mrs G Jones	Policy BG1		Support the objections already submitted by Walford and Lingen residents. New houses need to meet the needs of local people. Properties in Walford have stayed on the market for longer than average, a number of years in some cases, probably due to Walford's flood zone position. Most of the properties in Walford are owned/lived in by outsiders, not locals. Walford has no amenities for either young or old, no bus service or even pavements, no community hall, as we are a hamlet, or even a decent notice board. Any significant properties would have a significant impact on the landscape, particularly from the main road to Knighton looking east. There is very poor infrastructure regarding mobile connectivity and broadband. Accessibility to services would have to be significantly improved.	
	Policy BG2		Although the sites are only just outside the flood zone, the extra run-off and waste water, there being no mains sewerage system, will find its way to the lowest point in Walford where there are Listed Buildings at the high risk of flooding. The water table is consistently high and ground water rises at a frightening rate within just one day of rain. Although some work has been done to the weir there is still a bottle-neck at both bridges. And flood insurance is very expensive if it can be found. This would apply to new properties in the post code area regardless of their relationship to the flood zone. Development would exacerbate the flood issue. There is already a large barn complex on the Knighton Road undergoing some renovation (understand workshops). There are enough workshops in Brampton Bryan and Leintwardine. These barns would best be flats or live/work. They could accommodate 16 flats or 10 live/work plus two cottages to the rear solving the housing issue in Walford. Flood impact is the highest concern.	
			Renewable energy should be a priority on any new buildings and this should be extended to other local residents who would benefit from solar panels, ground/air source heating etc. which up to now has been refused, particularly for Listed Buildings which the Council/Government want preserving but cost too much for people to	

Respondent Identification Number	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Suggested Changes Parish Council Consideration (In blue)	Proposed Change Number
			take on due to many restrictions, often unreasonable.	

Schedule 2: Stakeholder Representations and Response

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Comment Parish Council Consideration (in blue)	Amendment Number
S2.1 Herefordshire Council (Statutory Consultee)	General		<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>These comments are provided on the basis that any other developments would be subject to application through the normal planning process.</p>	
	Policy BG1	Comment	In general conformity (with Local Plan)	
	Policy BG2	Comment	In general conformity (with Local Plan)	
	Para 3.1	Recommend change	Figures should be referred to as 'indicative growth' not 'targets' and add 'approximately' to any figures	
	Policy BG3		In general conformity (with Local Plan); Potential opportunities for conversion and new development are identified which it is presumed are available and deliverable and, if delivered, would exceed the housing target (? – our emphasis given the above). Formally allocating these sites in the policy would provide a greater level of assurance and certainty that sites are deliverable and will come forward for development.	
			Amend point e) to read that 'the amenity and privacy of existing and new residential premises should be protected'	
	Policy BG4		In general conformity (with Local Plan); Potential opportunities for conversion and new development are identified which it is presumed are available and deliverable and, if delivered, would exceed the housing target (? – our emphasis	

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Comment Parish Council Consideration (in blue)	Amendment Number
			given the above). Formally allocating these sites in the policy would provide a greater level of assurance and certainty that sites are deliverable and will come forward for development.	
			After i) insert 'new residential premises shall not be adversely affected by adjacent commercial or agricultural activities.'	
	Policy BG5		In general conformity (with Local Plan); Potential opportunities for conversion and new development are identified which it is presumed are available and deliverable and, if delivered, would exceed the housing target (? – our emphasis given the above). Formally allocating these sites in the policy would provide a greater level of assurance and certainty that sites are deliverable and will come forward for development.	
			Insert criterion - 'new residential premises shall not be adversely affected by adjacent commercial or agricultural activities.'	
	Policy BG6		In general conformity (with Local Plan)	
	Policy BG7		In general conformity (with Local Plan); Potential opportunities for conversion and new development are identified which it is presumed are available and deliverable and, if delivered, would exceed the housing target (? – our emphasis given the above). Formally allocating these sites in the policy would provide a greater level of assurance and certainty that sites are deliverable and will come forward for development.	
			Insert - 'new residential premises shall not be adversely affected by adjacent commercial or agricultural activities.'	
	Policy BG8		In general conformity (with Local Plan)	
			In point 3 note registered providers do not provide funding for self-build projects.	
	Policy BG9		In general conformity (with Local Plan)	
	Policy BG10		In general conformity (with Local Plan)	
	Policy PG11		In general conformity (with Local Plan)	
	Policy BG12		In general conformity (with Local Plan)	

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Comment Parish Council Consideration (in blue)	Amendment Number
	Policy BG13		In general conformity (with Local Plan)	
	Policy BG14		In general conformity (with Local Plan); Development must also have regard to the Strategic Flood Risk Assessment for Herefordshire (SFRA) 2009.	
	Policy BG15		In general conformity (with Local Plan)	
	Policy BG16		In general conformity (with Local Plan)	
	Policy BG17		In general conformity (with Local Plan)	
	Policy BG18		In general conformity (with Local Plan)	
	Appendix 2 - Various		There's a section on Sustainable Transport Initiatives (2.1) which refers to active travel routes, then nothing about active travel under section 3. Transport and Highways. Finally, 6 is headed Tourism, Footpaths and Cycle Routes, but talks solely about PROW and footpaths. There seems to be a bit of a disconnect between the three sections which ideally would tie in together.	
	Appendix 2 Para 3.2		We would like to ask for clarification of the wording in section 3.2? Maintenance is undertaken in line with the Highways Maintenance Plan. For issues surrounding this we suggest you contact Balfour Beatty Living Places who oversee highway maintenance on behalf of the council.	
	Appendix 2 para 6.1		Suggest the following: 6.1 Seek a high standard of maintenance and greater promotion of public rights of way footpaths and cycle routes within the group of parishes, developing linked routes associated with Offa's Dyke and Hereford Trail Footpaths, including working with adjacent parishes. Rationale: cycle routes aren't always restricted to PROW and often can necessarily include highway sections as well. There are a few examples on their neighbourhood already, eg. National Byway, Radnor Loop. Should you wish to cater for equestrians we would suggest expanding further to footpaths, bridleways and cycle routes?	
	SEA and HRA	Comment	Please also note any recommendations within the SEA and HRA reports.	
S2.2 Welsh Water	Whole plan		DCWW are supportive of the aims, objectives and policies set out.	

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Comment Parish Council Consideration (in blue)	Amendment Number
Dwr Cymru (Statutory Consultee)	Section 3		We do not envisage any issues in providing a supply of clean water for the circa 44 new housing units proposed up to 2031, other than the potential provision of off-site main laying.	
	Policy BG14		It is our understanding that any public sewerage that exists within the Group Parish area is within the Sever Trent Water (STW) operational area for public sewerage. As such, we would advise that STW are contacted for comment on the impact of development on their assets. Where no public sewerage exists, alternative foul drainage options will be required in line with the criteria set out under Policy SD4 of the CS.	
S2.3 Historic England (Statutory Consultee)	Whole Plan		Supportive of the Vision and objectives set out in the Plan and the content of the document, particularly its' emphasis on local distinctiveness including undesignated heritage assets and the maintenance of historic rural character. Overall the plan reads as a well-considered, concise and fit for purpose document which we consider takes a suitably proportionate approach to the historic environment of the Parish.	
	Policy BG17		Specific references in Policy to the protection of historic farmsteads and archaeological remains are particularly welcome.	
S2.4 Natural England (Statutory Consultee)	Policy BG1		We previously advised the policy should be strengthened, with additional criteria that development which would have an adverse impact on European sites will not be permitted and note that specific policy wording has not been altered. Suggest this policy is altered to avoid ambiguity; specifically stating that housing numbers should not exceed those set out in the Local Plan to avoid impacts on designated sites.	
	Policy BG9	Support	Support the inclusion of wording requesting the retention of features such as ponds and hedgerows in response to previous representations.	
	Policy BG14	Suggest change	We previously advised that an additional criterion should be added to the policy that "where non-mains drainage is proposed for example package treatment plant or a septic tank, then these should discharge to a soakaway and that these are sited 30m from any water courses and outside the flood plain". Policy commitment to the use of soakaway (which removes phosphate), where practical, for development with no mains sewerage would help to reduce impacts on river habitats.	
	Policy BG16	Support	Support the inclusion of your revised policy wording. It would also be appropriate to include a commitment to the creation of habitat, such as community orchards, in keeping with the local landscape character, as part of new development.	
	Further Issues	Advice	An annex was provided setting out sources of environmental information and some natural environment issues to consider in developing the neighbourhood plan.	

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Comment Parish Council Consideration (in blue)	Amendment Number
	HRA Addendum		The findings of the additional information provided in support of the HRA addendum are noted.	
S2.5 Environment Agency (Statutory Consultee)	Policy BG6		Note that the Nursery Site in Lingen lies adjacent to the Lime Brook (Ordinary Watercourse) and that there is an area of Flood Zone 2/3 associated with this watercourse. However, as the site is proposed to accommodate a maximum of 5 dwellings we would accept that all built development can be located within Flood Zone 1. Any forthcoming planning application will need to be accompanied by a detailed Flood Risk Assessment (FRA) which confirms that the development will be safe without increasing flood risk to third parties. The Lime Brook (Lime Bk – Source to Confluence of R Lugg) is currently at 'good status'. In line with the above we would expect development in the area to have no detrimental impact on the watercourse and, where possible, aid in it maintaining 'good status' by 2027.	
	Policy BG14		We welcome reference to flood risk in (this policy) in the plan and also in consideration of future development throughout the Parish. As confirmed on the submitted Pro Forma all development will be located within Flood Zone 1, the low risk Zone. Development of the Nursery site, and all windfall development within the Parish, should adhere to your Policy BG14 along with Policy SD3 of Herefordshire Council's Core Strategy. It should be noted that the Flood Map provides an indication of 'fluvial' flood risk only. You are advised to discuss matters relating to surface water (pluvial) flooding with Herefordshire Council as the Lead Local Flood Authority (LLFA).	
S2.6 Highways Agency (Statutory Consultee)	Whole Plan	No comments received	NO RESPONSE RECEIVED	
S2.7 Presteigne and Norton Town Council	Whole plan	No comments	The Town Council thanks you for consulting it. It has no comment to make.	
S2.8 Network rail	Whole plan	Advice	Refers to requirements in terms of publicity for planning applications within 10 m of railway land; assessing the impact of development on level crossings; requesting the opportunity to comment on planning applications on sites adjoining the railway	