

Border Group Neighbourhood Development Plan

Schedules of Representations in response to Draft Plan, June 2016

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
C.1 Paul Derrick	All Policies		Throughout the document there seems to be a substantial reliance on the word “should” rather than “shall”. Surely if there is a desire to see particular types of development style etc., the Plan should be more prescriptive. The use of ‘should’ is effectively a synonym for ‘ought to’ and reflects the nature of the planning process as one where judgements need to be made through balancing potentially conflicting objectives. It is generally used in planning policies together with ‘will’ when a more definitive response is expected.	No change proposed
	Whole Plan		Throughout the document, the Border Group Parish seems to be referred to by its correct title, plus “Group Parish”, “group parish”, “Group of Parishes”, “group of parishes”, “Border Group” and “Group parish”. It would aid consistency if the correct title were to be used throughout the document. Useful advice – refer to ‘Border Group Parish’	See change No 5
	Whole Plan		Within the Plan, the Policies are highlighted by being printed in bold lettering, and as such are presumably intended to be stand-alone statements, supported by explanatory paragraphs. Yet the numbering of explanatory paragraphs throughout the document carries on independently of the numbering of the policies. Surely, the numbering of the explanatory paragraphs following each Policy statement should have some relationship to the numbering of those policies? The paragraph numbers relate to the section not the policy number. There are sections with paragraph numbers that do not have policies and the suggestion would in effect result in different approaches within the same document. This is not a critical issue but a preference for ease of presentation	No change proposed
	Para 2.2		Apart from their association with any future developments, Objectives three and four appear not to be dealt with. As they are issues that appear to have been raised by the community during the initial consultation process, I would have expected to see them addressed as independent policies. Objective three is addressed through policies BG1; BG3; BG5; BG7; BG9; BG10; BG12; BG13 and BG14. Objective four is addressed through policy BG15	No change proposed
	Policy BG17		There appears to be a word missing from BG17 i) “Opposing development that adversely (affects?) important buildings.....etc.”. Grateful for the advice	See change No 32
	Appendix 1 Para 2 b)		There are no numbers i) and ii) Grateful for the advice	See change No 36
	Appendix 1 Para 4.2 a)		Sub paragraph a) Dwelling Type. The final sentence does not make sense. Does it mean that housing for older people and for larger families is specifically excluded? If so, the reference in Sub paragraph b) to the community not wishing to see a	See change No 37

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			<p>preponderance of larger detached properties seems to be irrelevant.</p> <p>The intention was to emphasise the site's benefits in providing small and medium sized family housing. However, it is accepted that the reference might cause confusion and is unnecessary.</p>	
C.2 K & M Davies	Policy BG6		<p>Criterion a) - Flood risk assessment has been carried out and report has been made available to the steering committee.</p> <p>The development of this land will require any report on flood risk to be submitted to Herefordshire Council as Local Planning Authority with any planning application. Consequently, it is correct to include this as a requirement</p>	No change proposed
			<p>The area marked as proposed housing development is incorrect as it does not include the garage area later referred to in the document under 3 The Site and Its Background</p> <p>The garage area falls within the settlement boundary their redevelopment within any scheme would not be an issue provided adequate provision were made for parking for both new and existing dwellings that might be affected. However, for consistency the garage area might usefully be shown within the site allocation.</p>	
	Appendix 1 Para 4.2 a)		<p>We disagree with the statement in 4.2. Lingen is in the catchment area and transport provision for Wigmore Academy (Primary and Secondary). Wigmore academy needs to maintain its viability by encouraging families into the area. There has also been a need for housing for older people in Lingen in recent years, retiring farmers have had to move out of the area instead of down to heart of village because of lack of housing.</p> <p>Although there may be school transport it is understood that there is no regular bus service to the village. This and the subsequent reference to older people and larger families is not to indicate any development on the site should preclude these but that any developer will not be required to provide them if s/he does not wish to on this site because of the absence of key services. The intention was to emphasise the site's benefits in providing small and medium sized family housing. However, it is accepted that the final sentence might cause confusion and is unnecessary.</p>	See Change No 37
			<p>If the SuD's and foul water treatments were to be located in the adjoining agricultural / horticultural land, then a figure of more than 5 dwellings would be possible and appropriate. We would favour SuDs and foul water treatment to be located in the adjoining land located to the south of the proposed development site, and for them to include the adjoining house.</p> <p>It is understood that part of the site is already used for drainage from a septic tank. On the assumption that the nursery site owner also owns, controls or is otherwise able to utilise the land further to the south in order to provide adequately for drainage an alteration is suggested. However, the issues of protection from flood risk, conserving conservation area character and appearance, maintaining access to the Brook for maintenance, and retention of the Public Right of Way including the views eastwards from the village across to Oldcastle Wood will still be relevant and affect the extent to which the site may be developed. The effects of these on the level of development that might be accommodated will need to be determined through any planning application. The estimate of number of dwellings is for the purposes of indicating the potential contribution to meeting the required target for the Group Parish. As a consequence, it may be on the modest side in order that the overall</p>	

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	Appendix 1 Para 4.3		<p>approach is shown to be a positive one.</p> <p>Landscaping screen of 5 meters around the site is in our opinion excessive as only a small area actually adjoins the brook edge and the remaining boundaries would not form part of the 'brook corridor'. A screen of 5 meters to the rear and side of the proposed development would not be as necessary as these about to open countryside and already have a natural screen which would only require maintenance and enhancement.</p> <p>It would be better to describe the purpose of the screen rather than specify a depth which may or may not serve that purpose.</p>	See Change No 39
C.3 D Thame	Whole Plan		<p>Much to value in here, but inadequate evidence or adequately detailed or reasoned policies will lead to developers walking all over it in the course of the next twenty years. The failure to address the future planning needs of obviously significant sites such Turn Farm, Lingen is extremely unwise. If no development is envisaged, say so and give reasons if yes let's have that stated explicitly and residents can take a view. As the plan stands it would permit such development but does not say so explicitly, leaving residents with a quite false view of the extent of development Lingen could see. Some confusion has arisen about what the planning policy for a site should be, and whether it is deliverable in the short, medium or long term. That the current owner does not wish to sell or develop may affect how deliverable a project is, but has no bearing at all on deciding what the planning policy ought to be. Existing owners do not always remain existing owners.</p> <p>The Turn Farm falls within the development boundary and may be developed as a consequence of this definition. It comprises a dwelling and a mixture of farm buildings. Some of the latter may be capable of conversion through other Core Strategy policies or permitted development. Others may be cleared away and replaced by new dwellings. However, at the time of drafting this plan the site was not indicated to be 'available' for development and consequently would not meet the requirements set out in the NPPF for it to be 'deliverable'.</p>	No change proposed
	Para 1.5		<p>Error in omitting the 2011 housing needs survey? Also: a developer would find it easy to challenge this evidence base: 2003 is ancient history.</p> <p>There is reference to the survey of 2014 which is the most recent. The content of the parish Plan had some relevance both in terms of informing the 2014 survey and the topics that are included in the Neighbourhood Plan</p>	No change proposed
	Para 1.11		<p>Capitalise "Conservation Area" – because this is a statutory designation</p> <p>The term here is used more in the general sense rather than the more specific 'Lingen Conservation Area.'</p>	No change proposed
	Para 2.2, Policies BG10 BG11 and supporting paras		<p>The evidence base on employment is thin. The focus on agricultural feels like a nostalgic gesture rather than a practical reflection of an economy in which more people work in the building trades, media and IT than in agriculture. Aymestrey conducted a thorough economic survey which revealed self-employed tradespeople as the largest group in employment by far, with media and IT following. If this is the case it substantially alters land use because much can be done from home and could be linked to BG11. Broadband connectivity should be a requirement for any new residential development.</p> <p>The objective and relevant policies in the plan do not focus on agriculture but on diversification within the local economy. The resources within the Group Parish are however its land and environment. There is recognition that many people undertake a range of activities and working from home is increasing. Policy BG10 seeks to support a range of activities but sets out criteria that need to be considered, including, in particular the scale of the activity.</p>	No change proposed

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			<p>Policy RG11 supports broadband. Policy BG9 indicates that broadband infrastructure should be included in the design for residential development.</p>	
	Para 3.2		<p>No effort is made to address the issue (para 1.11) that the four settlements are quite unequal, Lingen not being on a major road. The justification for equal allocation is therefore missing. It would be better simply to acknowledge the inequality and adjust accordingly.</p> <p>Each village has its own constraints and this is referred to generally in this paragraph. Paragraph 1.11 identifies specific issues related to Lingen. Other paragraphs both before and after this describe those for the other three villages. The strategy for accommodating development reflects the earlier policy approach that the community was presented with and although this has changed, it is considered the most appropriate given constraints and the various communities expressed desires.</p>	No change proposed
	Policy BG5		<p>i) Add explicitly as a policy objective to protect, as a unique defining feature of the Lingen Conservation Area, the wide 90 degree views of the church from the surrounding hill, and the views from the church of the hills.</p> <p>ii) Add explicitly a provision to define any garden over 0.25 acres (0.10 hectares) as greenfield not brownfield. Or perhaps some other formulation could be found? Otherwise, in a village with large gardens, this is where your pressure for development will manifest itself over the 20-year plan period and it will take the form of spatchcocked closes and cul-de-sacs out of keeping with the Conservation Area.</p> <p>iii) Explicitly address some sites included in the development boundary for Lingen but which have not been addressed opening the door to unforeseen, unconsidered and perhaps excessive development. The large flat site at Turn Farm, brownfield, will inevitably be of interest to developers and could accommodate 30-50 houses. Not identifying and explaining why this is – or isn’t – a suitable development site leaves a massive lacuna in the plan which developers are sure to exploit. The point of a NDP is to openly discuss these issues now – not to leave them to adventitious and adventurous applications later. There may be other sites to which this concern applies. Not addressing such sites leaves open the possibility that they’ve been ignored specifically to permit future development. This could be accomplished by appending a housing needs assessment in which each site is identified, assessed and graded. For larger sites such as Turn Farm, separate paragraphs in the document would be required.</p> <p>i) Policy BG5 refers to the need for development not to adversely affect Lingen Conservation Area Policy BG18). It also refers to the protection of Local Green Space. Paragraph 3.11 refers to the gap to the south west from the Church which would be across to the hills in that direction. Requirement 3 of Policy BG18 protects views into and from the village specifically referring to views to the hills to the south and west as seen from Turn Farm Corner and the Church. This should adequately cover this representation.</p> <p>ii) This is not possible. Judgment about whether a garden area might be developed must be based upon the merits of each individual case given the various policies and criteria within these. The criteria listed in Policy BG5, particularly a) to d) would need to be considered as would Policy BG9 f) and Policy BG18. Elements of other</p>	No change proposed

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			<p>policies may also be relevant depending upon the circumstances. It is understood these comprise the accepted approach to avoiding 'garden grabbing'.</p> <p>iii) Considerable thought has been given to the Turn Farm and some of it is included within the settlement boundary and might come forward for development provided it meets the criteria set out in Policy BG5. Some of the site also presents a conversion opportunity. More generally sites have to be within the settlement boundary to be developed for housing unless they comprise proposals falling within the parameters of Herefordshire Core Strategy Policy RA3. The policy based approach is generally the accepted one to cover both development within a settlement boundary and allocated sites. However, this Plan does look in detail at the allocated site and this is considered the appropriate level of detail for Lingen.</p>	
	MAP 2, page 24		<p>Lingen settlement boundary: Developers and others are sure to question decisions for which no rationale or evidence base is given. On the Lingen settlement boundary a large part of the (developed, thus brownfield) Turn Farm site in the centre of the village is excluded from the boundary whilst several complete undeveloped fields at the extremity of the village, and at some distance from the highway, are included (at Yew Tree Cottage). This is odd, unless it is intended to permit mid-scale development on fields at Yew Tree and no effort to explain it has been made.</p> <p>The plan must make provision for a certain level of development in order to at least achieve the required target set out by Herefordshire Local Plan Core Strategy. Not to do so would result in planning permissions being granted that the community considers even less desirable. The approach taken to making land available is considered most appropriate to for Lingen's contribution to the Group parish total.</p>	No change proposed
	Policy BG12		<p>No problem with what this policy attempts, but it needs much stronger drafting to survive and inspection and withstand developer attacks now and in the next 20 years: much more precision is required and a base in evidence, for instance, landscape character assessments. Specific reference to more forms of renewable energy needs to be made – solar arrays particularly. What is the view on anaerobic biodigestion? It appears to be ruled out – why?</p> <p>No advice upon how the policy might be made more precise is offered. The criteria cover criteria such as landscape character in addition to a number of other environmental constraints. The policy does not rule out anaerobic digestion and this is only one form of renewable energy generation methods. The only one ruled out specifically is wind turbines, other than proposals for individual turbines. Government policy only allows local communities to express such a view for wind turbines.</p>	No change proposed
	Policy BG15		<p>I'm not sure what BG15 is trying to do – it either states the blindingly obvious, or its trying to permit something, but what? Omit or make what it actually has in mind a good deal clearer.</p> <p>The policy appears to have lost its sense during redrafting. Its purpose is to enable premises containing existing facilities and/or services to expand to accommodate further community facilities or other local services if this would enable the local community to have those facilities and services available more locally. It recognises that in some villages services and facilities are or can be provided through different types of premises. However, it is accepted that the Policy needs to be redrafted in order to add clarity and the observation is helpful. In addition,</p>	See change No 29

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			it is noted that the policy does not protect existing facilities.	
	Policy BG18		Excellent to see this – but it needs more elaboration if it’s not to be too easily embraced or challenged as an unreviewed conservation area designation. Specify the particular materials and styles that constitute Lingen’s distinctive look, specify the scale – this kind of thing. The policies themselves – as opposed to the explanatory rubric – need to be more demandingly detailed. A conservation area appraisal can be used to help local planning authorities develop a management plan and appropriate policies for the Local Plan. A good appraisal will consider what features make a positive or negative contribution to the significance of the conservation area, thereby identifying opportunities for beneficial change or the need for planning protection.”	No change proposed
			A more detailed appraisal would certainly be able to add detail either as a policy or design guidance in an appendix. However, Herefordshire Council has not prepared such an appraisal and the time and resources necessary to do this are not available to the Neighbourhood Plan Steering Group. Given these constraints it is considered that the approach is appropriate for this Plan. Should there be any possibility of an appraisal being carried out in the future then policy statements should provide the basis for more detailed guidance to be taken into account.	
C.4 S Jack	Policy BG3		Concerned about the extra traffic resulting from further housing in this area. At present one takes one's life in one's hands to walk down the A4110 through the village. This is due to the number of vehicles that speed through the village - exceeding the 30mph. There have been several minor accidents so far - a miracle no serious ones yet. I would like to know if the village will get some kind of reinforcement of the speed limit to slow the traffic down permanently, whether it be chicanes, speed bumps or other means.	No change proposed
			Safety concerns related to the A4110 are a reason why only limited development potential is identified at Adforton and any proposals would need to comply with criterion BG3 d) relating to access onto the highway. Policy BG13 adds strength to this requirement by referring more generally to adjacent roads and proposals should not generate traffic that would use roads that did not have sufficient capacity. Herefordshire Council as Highway authority has not objected to the approach put forward. Policy BG13 also indicates that the Parish Council will discuss the introduction of measures to address community concerns and will be advised of this issue you raise in relation to Adforton village.	
C.5 D Rowlands C.14 M Rowlands	General	Comment	Value the tranquillity of the area and would not want tom see it diminished through inappropriate tourism and leisure development such as shooting, motor-sports and off-road driving	No change proposed
			Comment noted	
	Policy BG5	Support	Strongly support the approach to Lingen as outlined in the document	No change proposed
			Support welcome	
	Policy BG6	Support	Strongly support the approach to Lingen as outlined in the document	No change proposed
			Support welcome	
	Policy BG18	Support	Strongly support the approach to Lingen as outlined in the document	No change proposed
			Support welcome	
C.6 B Thomas	Whole Plan	General support	With minor revisions and polishing – a good plan	No change proposed
			Noted	

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C.7 H Thomas C.8 J Thomas C.9 A Thomas C.10 J Thomas	Objective 1	Support	Particularly support this objective Support welcome	No change proposed
	Objective 2	Recommend change	Should emphasise the importance of heritage, landscape and tranquillity The issues are generally covered in Objective 5. Policies BG16, BG17 and BG18 also cover the matters suggested.	No change proposed
	Objective 5	Support	Particularly support this objective Support welcome	No change proposed
	Para 3.12	Object	Statement 'Development will be limited to infilling' conflicts with the acknowledged importance of edge-of-village sites. These should be specifically justified as appropriate locations for live/work development which would not affect the character of the conservation area, landscape or neighbours It is not intended to restrict development of those sites on the edge of the village falling within the development boundaries. The opposite is actually the case. However, it may be useful to clarify this in the paragraph	See change No 19
	Policy BG10 Para 4.1	Recommend change	Should specify the importance of tranquillity and reject noisy developments such as motor sports shooting schools, micro-lights. The policy requires development not to adversely affect the amenity of residents and this should cover the issue. However, it might be useful to explain the concerns about noisy tourism and leisure activities within the supporting statement. Policies can only relate to development. It is not possible to cover noise from micro-lights flying over the area.	See change No 21
	Appendix 1	Recommend change	Outline applications cannot be made in conservation areas. A tree and habitat survey should be required to identify protected trees and features. Agreed – the advice is welcome.	See change No 35
	Appendix 2, section 6	Recommend change	Should refer to tourism and rights of way as bridle paths and BOATS are arguably useful for tourism and leisure. The need to clarify this reference is accepted.	See change NO 42
	C11 B Lewis	Policy BG5 and BG6		The plan for Lingen appears to approach the issue of future development of the parish in a measured and sensible way. Past history suggests some development is appropriate for a living community which should reflect contemporary architecture, materials and building techniques. The proposed development rate will sustain the overall character and tranquillity of the area. While sensible to steer future development to infill there should be some flexibility for development by existing residents and others who earn their living by providing goods and services to the local community. Housing outside of Lingen's development boundaries must comply with Herefordshire Local Plan Core Strategy Policy RA3. This does provide for agricultural dwellings and dwellings required to support a rural enterprise. It also allows for the provision of affordable housing. Within the development boundary (and settlement boundaries for Adforton and Walford) housing sites are proposed to contribute towards a target that has been set for the Group Parish. The ownership of these will not be restricted but the approach is based upon providing small and individual sites where it is most likely that some will be brought forward by local residents to meet their needs.
C.12 L Singer	Objective 1	Support	Strongly support objective 1. Maintaining Lingen's tranquillity is vital to tourism and the quality of life of local inhabitants	No change proposed

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C.15 K Singer	Policy BG18	Support	Support welcome	No change proposed
			Agree with the objectives of the assessment and policies for Lingen Conservation Area Support welcome	
C.13 V Simpson C.16 A Simpson	Whole Plan	Support	For Lingen this is a good plan Support welcome	No change proposed
	Policy BG10; Tourism and leisure development	Comment	Lingen is a quiet, peaceful village that would be spoiled by any tourism or leisure development The policy requires development not to adversely affect the amenity of residents and this should cover the issue. However, it might be useful to explain the concerns about noisy tourism and leisure activities within the supporting statement.	See change N0 22
C.17 Mrs Bordewey	Policy BG5/or new policy	Recommend change	Include land to rear of the Chapel for housing and a car park to serve the Chapel and visitors. The site would provide 3 x 2/3 bed properties. Site is deliverable. The site is rising ground and quite prominent from points along the road and the Chapel Lane. Its undeveloped nature contributes towards the character and appearance of the Conservation Area in this location, maintaining its rural edge along the west side of the village. The form of the field suggests it may contain traces of medieval ridge and furrow which is a rare survival in Lingen and a precautionary approach should be taken until evidence suggests otherwise. Development on this parcel would exacerbate 'back-land' development which with one exception is generally absent on this side of the settlement and Conservation Area. The site's development would therefore weaken this quality. Development would affect the residential amenity of existing residents at the Old Post Office Cottages, Eastwood House and Nutwood as a consequence of traffic along the adjacent narrow lane. There is insufficient evidence to show that the access to the site - between the Chapel and Eastwood House - is suitable for extra traffic or could be improved to be so, in particular to ensure safe exit from the lane. The Chapel is an attractive building of local interest, the setting of which would be adversely affected. The track is understood to be in a different ownership. No evidence has been advanced to indicate that right of access is available for any new development or for a car park, which the representation suggests might be provided. Consequently, the site does not have sufficient certainty that it is deliverable.	No change proposed

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			 <p data-bbox="1279 868 1935 890">© Crown copyright and database rights [2015] Ordnance Survey 100054737</p>	
Policy BG5/or new policy	Recommend change	The SHLAA indicates that sites to the north of the village cannot be brought forward and consequently consideration needs to be given to sites being brought forward to its south.	<p data-bbox="801 986 1424 1010">A site is proposed for development to the south of the village.</p>	No change proposed
Whole plan	Object	Adforton, Lingen and Brampton Bryan should take more houses and Walford less in order to comply with Core Strategy Policy RA2. Walford's development is restricted by the area at risk of flooding.	<p data-bbox="801 1077 1928 1217">Herefordshire Council has advised that the distribution of dwellings in a neighbourhood plan is to be determined by the neighbourhood forum established for the purpose and has not queried this aspect of the approach given the various constraints that have been taken into account. All four settlements have specific constraints and the approach taken in this instance takes these into account. Sufficient sites exist at Walford outside of the area at risk of flooding to enable the settlement to make its contribution to the Group Parish's target.</p>	No change proposed
Whole Plan	Object	The plan relies too much upon windfall development coming forward and therefore does not provide sufficient certainty that the minimum housing requirement will be met	<p data-bbox="801 1289 1921 1366">Sufficient sites are available within the plan to achieve and exceed the required target and that meet the test of available and achievable. The ability to meet and achieve the target is explained in alterations proposed in the plan.</p>	See Changes Numbers 9, 10, 11, 12, 15 and 16.

Schedule 2: Stakeholder Representations and Response

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Comment Parish Council Consideration (in blue)	Amendment Number
S.1 Herefordshire Council (Statutory Consultee)	Front Cover	Recommend change	Add the plan period to the front cover i.e. 2011-2031 Advice welcome	See Change No 1
	Para 1.2	Recommend change	Amend date – Core Strategy was adopted on 16 October 2015 Grateful for pointing out error	See Change No 6
	Policy BG1	Recommend change	Add to point d) – ‘Opportunities should be taken to provide infrastructure on and off-site that facilitates and encourages active travel.’ Border Group Parish is sparsely populated and remote. It is extremely unlikely that resources will be available to the County council to bring forward supporting infrastructure during the plan period that would complement any developer provided facilities for active travel. However, on the basis that this just might be possible this is recognised in changes elsewhere, in particular Policies BG4 and BG10. It is though not considered appropriate in terms of a priority for the Group Parish such that the issue should be covered in this policy. Unless and until measures are included in Herefordshire Local Transport Plan that would support active travel throughout the Group Parish it would be onerous to ask developers and the local community to provide facilities that would not have any meaningful effect. It would be far better to contribute towards other more practical and realistic sustainable development measures.	No change proposed
	Policy BG2	Recommend change	Amend first and third bullet to remove the term ‘controlled’ The reason why this term should be deleted is uncertain although it might usefully be replaced by ‘managed’.	See Change No 8
		Objection	Not in general conformity - There is some difficulty in ascertaining whether the predominant approach of relying on infill and rural building conversion schemes coming forward will be able to deliver the required housing growth target without further evidence that these are likely to come forward. Amendment is proposed to para 2.16 following submission of further evidence to Herefordshire Council about the ability to deliver the required amount of housing.	See Change No 9
	Section 3	Comment and concern	Alongside some other relatively minor conformity and wording issues, there are some concerns over the predominant housing strategy. It is difficult to ascertain whether (aside from the allocated site in Lingen) relying largely on small infill and agricultural building conversion schemes coming forward is going to be able to deliver the housing target at this stage, without further evidence to suggest that sites and identified conversion opportunities are deliverable and available. Amendment is proposed to para 3.1 following submission of further evidence to Herefordshire Council about the ability to deliver the required amount of housing.	See Change No 10
	Para 3.1	Recommend	Figures should be referred to as ‘indicative growth’ not ‘targets’ and add ‘approximately’ to any figures	No change proposed

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		change	<p>Herefordshire Local Plan Core Strategy uses that term 'indicative housing growth target within Policy RA1. Policy RA2 uses 'minimum growth target'. With regard to neighbourhood Plans the reference is:</p> <p>'Neighbourhood Development Plans will allocate land for new housing or otherwise demonstrate delivery to provide levels of housing to meet the various <u>targets</u>, by indicating levels of suitable and available capacity.'</p> <p>There is no reference to 'approximate'.</p> <p>The present term is therefore considered to accord with Herefordshire Local Plan Core Strategy.</p>	
	Policy BG3	Objection	<p>Not in general conformity - Is there evidence that the seemingly limited opportunities for new "infill" development schemes within the defined settlement boundary are likely to come forward?</p> <p>Is there also evidence to suggest that the identified redundant agricultural buildings with potential are likely to come forward for conversion (e.g. Historic conversion rates locally)?</p> <p>Amendment is proposed to para 3.5 following submission of further evidence to Herefordshire Council about the ability to deliver the required amount of housing.</p>	See Change No
	Map1	Recommend change	<p>All maps will require the Border Group PC PSMA license number to be displayed to meet copyright regulations.</p> <p>The Group Parish PSMA number is 100024168 and will be added</p>	See Change No 7
	Policy BG4	Clarification required	<p>In the final paragraph the use of the term 'extensions' is unclear – extensions to the road frontage or extensions to individual properties.</p> <p>It is accepted that the meaning of the term is uncertain and it also is unnecessary as the policy is sufficient with 'infill'.</p>	See Change No 13
		Objection	<p>Not in general conformity - Is there evidence to suggest that the identified redundant agricultural buildings with potential are likely to come forward for conversion (e.g. Historic conversion rates locally)?</p> <p>Amendment is proposed to paras 3.8 and 3.9 following submission of further evidence to Herefordshire Council about the ability to deliver the required amount of housing.</p>	See Change No 12
	Policy BG4 ii)	Recommend change	<p>Add to point ii) – 'Opportunities should be taken to develop routes and off-site (measures?) that facilitate and encourage active travel.'</p> <p>The Group Parish is remote, sparsely populated, and has few local facilities. The resources available for such areas are limited. It is difficult to see any realistic measures being brought forward that might make limited infrastructure by developers and the local community of any practical value. However, on the basis that Herefordshire Council might make some investment in parish-wide infrastructure the required change will be made.</p>	See Change No 14
	Policy BG5	Objection	<p>Not in general conformity - Is there evidence that the seemingly limited opportunities for new road frontage development schemes within the defined settlement boundary are likely to come forward?</p> <p>Amendment is proposed para 3.12 following submission of further evidence to Herefordshire Council about the ability to deliver the required amount of housing.</p>	See Change No 15
	Policy BG6	Objection	<p>Not in general conformity - Is there evidence of this site's availability to be released for housing development?</p>	See Change No 15

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			The site is known to be available and the site owners have made representations which indicate they wish to bring this forward for development. Amendment is proposed to para 3.12 following submission of further evidence to Herefordshire Council about the ability to deliver the required amount of housing.	
	Para 3.11	Recommend further explanation	Include NPPF justification for Local Green Spaces – this has been a requirement in examinations so far – any LGS not clearly stating how they meet the NPPF requirement could be removed by examiner. The importance of these areas of Local Green Space is set out in this policy and also Policy BG18. However, it is accepted that the explanation in paragraph 3.11 might be more comprehensive.	See changes No 18
	Policy BG7	Objection	Not in general conformity - Is there evidence that the seemingly limited opportunities for new “infill” development schemes within the defined settlement boundary are likely to come forward? Is there also evidence to suggest that the identified redundant agricultural buildings with potential are likely to come forward for conversion (e.g. Historic conversion rates locally)? Amendment is proposed to para 3.15 following submission of further evidence to Herefordshire Council about the ability to deliver the required amount of housing.	See Change No 16
	Policy BG10	Recommend change	Add to point iv) - Opportunities should be taken to develop routes (on?) and off-site that facilitate and encourage active travel. The Group Parish is remote, sparsely populated, and has few local facilities. The resources available for such areas are limited. It is difficult to see any realistic measures being brought forward that might make limited infrastructure by developers and the local community of any practical value. However, on the basis that Herefordshire Council might make some investment in parish-wide infrastructure the required change will be made.	See Change No 21
	Policy BG12	Recommend change	The wording here is a little clumsy and could potentially be misinterpreted. Suggested: “Proposals for wind energy schemes will not be supported, apart from individual turbine proposals that meet the above criteria.” Advice welcome	See Change No 23
	Policy BG13	Recommend change	Add additional criterion – ‘Opportunities should be taken to develop routes and off-site that facilitate and encourage active travel.’ The Group Parish is remote, sparsely populated, and has few local facilities. The resources available for such areas are limited. It is difficult to see any realistic measures being brought forward that might make limited infrastructure by developers and the local community of any practical value. However, on the basis that Herefordshire Council might make some investment in parish-wide infrastructure the required change will be made.	See change No 24
	Policy BG14	Objection	Not in general conformity - Development should be located in accordance with the Sequential Test and Exception Tests (where appropriate) outlined in the NPPF paragraphs 100-104. It must also have regard to the Strategic Flood Risk Assessment (SFRA) 2009 for Herefordshire. It is accepted that an amendment is required to ensure this policy meets the requirements of the NPPF. However, the Strategic Flood Risk Assessment (2009) is already out of date and reference is made to this in particular in relation to Walford where works to weirs have been undertaken. It is more appropriate for developers to undertake more detailed site specific flood risk assessments as indicated in NPPF para 103.	See change No 26

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Comment Parish Council Consideration (in blue)	Amendment Number
	Para 5.5	Recommend change	Make reference to the River Wye SAC catchment area as in this area the Lugg and the Teme are not within the SAC designation itself. It would be more appropriate to make this reference in para 5.6	See change No 27
	Policy BG15	Recommend change	Delete 'The use of' at the beginning of the policy – in order to make clear The grammatical error is accepted and a change is proposed as part of a major redrafting of this policy to include protection of existing facilities.	See Change No 29
	Policy BG17	Recommend change	Where possible and appropriate, opportunities for development to contribute to the character of heritage assets and their setting should be explored. Although the terminology suggested is not generally that used in relation to heritage assets the intention is accepted and a change proposed.	See change No 33
	Appendix 2 para 2.1	Recommend change	Amend to read 'Take every opportunity to develop active travel routes and utilise rural transport initiatives to improve public transport services within the Group of Parishes, including alternative transport systems.' The opportunity for this appears very unlikely given the nature of the Group Parish. However, the principle is not objected to.	See Change No 40
	Appendix 2, Section 6	Recommend change	Amend title to read 'Tourism, Footpaths and Cycle routes' There are no known cycle routes within the Group Parish and neither are any expected. However, in the expectation that as Herefordshire Council has asked for this change they may be proposing such, then there is no objection to the suggested change	See Change No 41
	SEA and HRA	Comment	Please also note any recommendations within the SEA and HRA reports. The conclusion within the SEA is: 'On the whole, it is considered that the Border Group NDP is in general conformity with both national planning policies contained in the National Planning Policy Framework and strategic policies set within the Herefordshire Local Plan (Core Strategy). Nor does it propose any growth that would be over and above that prescribed by strategic policies. Therefore, no changes to the NDP are recommended as a result of the SEA, however suggestions have been made where additional strengthen could be added to the existing safeguards.' Changes are proposed as a consequence of advice from HC and other agencies that would be expected to cover the suggestions to strengthen the plan.	No further changes proposed.
S2 Welsh Water Dwr Cymru (Statutory Consultee)	Whole plan		DCWW are supportive of the aims, objectives and policies set out. Noted	No change proposed
	Section 3		We do not envisage any issues in providing a supply of clean water for the circa 36 new housing units proposed up to 2031, other than the potential provision of off-site main laying. Noted	No change proposed
	Policy BG14		It is our understanding that any public sewerage that exists within the Group Parish area is within the Sever Trent Water	No change proposed

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			(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. Noted – STW consulted (see below)	
S3 Severn Trent Water (Statutory Consultee)	Policy BG3		Provided surface water on any new development is managed sustainably and is not connected to the foul water sewers in the village, the connection of a small number of new properties associated from infill development is not envisaged to result in capacity constraints. Noted – Policy BG14 covers the issue of surface water drainage utilising a SuDs arrangement	No change proposed
	Policy BG4		Provided surface water on any new development is managed sustainably and is not connected to the foul water sewers in the village, the additional foul only flows from a small number of rural building conversions and single infill development is not envisaged to result in capacity constraints Noted – Policy BG14 covers the issue of surface water drainage utilising a SuDs arrangement.	No change proposed
	Policies BG5 and BG6		There is no Severn Trent public sewerage system in Lingen village. Noted	No change proposed
	Policy BG7		There is no Severn Trent public sewerage system in Walford village. Noted	No change proposed
S4 Historic England (Statutory Consultee)	Whole Plan		Historic England are 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. Noted	No change proposed
	Policy BG2		Add into the policy rubric of Policy BG2 the wording: <i>...In considering repair, alteration or conversion of historic farm buildings due reference should be made and detailed consideration be given to the Herefordshire Farmsteads Characterisation Project.</i> You may wish to include the link to the characterisation project: https://content.historicengland.org.uk/images-books/publications/wm-county-summaries/569611/ The advice is noted but instead of addressing this through the more generalised strategic policy of BG2, it is considered more appropriate to add as a criterion top Policy BG17	See change No 34
S5 Natural England (Statutory Consultee)	Policy BG1		This policy could be strengthened with an additional criterion that development that will have an adverse effect on European protected sites (River Clun SAC and the River Wye SAC) will not be permitted. Although parts of the Group parish fall within the catchments for these rivers the settlements are somewhat remote from them and consequently this issue, although important at a county scale, is not seen as a local priority. This is not to say that it should not be a material consideration when determining the effects of development on the natural environment. Herefordshire Local Plan Core Strategy Policy SD4 combined with this plan's policy BG16 is considered appropriate to address the protection issue with the latter more particularly promoting a positive approach to biodiversity enhancement. Reference however might usefully be made in para 5.6 to the River Lugg and its	See change No 28

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			relationship with the River Wye SAC.	
	Policy BG9		<p>Welcome the inclusion of this policy, particularly c.) and e.). The policy could be expanded to include more about green infrastructure, to protect existing green infrastructure within the boundary of the plan area and to promote creation of new green infrastructure if new development proposals come forward. Such green infrastructure could include protection and creation of floodplain grazing marsh, calcareous grassland, traditional orchards, woodland, and wildlife corridors and other environmental assets in the area to preserve and expand the existing ecosystem network. An example of a green infrastructure provision is sustainable drainage systems. Proposals may present opportunities to incorporate features such as roosting opportunities for bats, the installation of bird nest boxes or the use of native species in the landscape planting and we advise including within a green infrastructure policy the requirement for ecological enhancements.</p> <p>The examples of green infrastructure indicated relate to habitats and measures supporting species. It is considered positive measures these are covered through policy BG16 and need not be duplicated. It needs to be remembered that a neighbourhood plan relates to measures that cover development and there is no ability for it to promote measures where development is not proposed. Consequently, there is little potential for this document to set out the approach suggested across the whole of the Group Parish. Other means to implement a Green Infrastructure Strategy will need to be sought.</p>	No change proposed.
	New policy on Wildlife Corridors		<p>Consider identifying within the plan potential areas to be targeted for creation of wildlife corridors, to improve connectivity between habitats, and could link this with this policy. The MAGIC website can help you identify areas of priority habitat and ancient woodland.</p> <p>The amount of development proposed is small and offers little potential for enabling such measures. However, this may be possible as part of the development of the Nursery site within Lingen. An amendment to Policy BG16 referring to the ecological network may however help to ensure this issue is covered to a practical degree. Reference might also be made to the measures to enhance the Limebrook.</p>	See changes No 17 and No 30
	New policy on protecting priority habitats		<p>Advise that should include a policy to protect specifically priority habitat (for example the floodplain grazing marsh, traditional orchards, woodland) and other environmental assets in the area to preserve the existing eco-system network.</p> <p>The extent of such habitats is uncertain within the plan area. Amendments to Policy BG16, although more general, should provide an appropriate level of protection when read in association with Herefordshire Local Plan Core Strategy Policy LD2 which need not be duplicated.</p>	See change No 31
	Policy BG14		<p>i) Welcome this policy. ii) Advise that an additional criterion is 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. iii) Advise adding in a criterion that run off rates from a development site should not be greater than the current greenfield run off rate.</p> <p>i) Noted ii) The plan makes reference to Herefordshire Local Plan Core Strategy policy SD4 being that which should cover</p>	<p>i) No change proposed. ii) See change No 25 iii)) No change proposed.</p>

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			foul/waste water disposal. It may not be possible to achieve 30 meters' distance in every instance. It is understood details for such drainage is a matter for Building Regulations. However, this representation has raised the issue off the Policy title being incorrect. iii) It is considered this requirement is too detailed and that the provisions of Policy BG14 are sufficient	
NE - rectify	Policy BG16		Welcome this policy and refer you to our advice on Policy BG9 – Design Criteria for Residential Development. Noted	No change proposed
S.6 Environment Agency (Statutory Consultee)			NO RESPONSE RECEIVED No response suggests happy with plan or no adverse comments to make	No change proposed
S.7 Highways Agency (Statutory Consultee)			NO RESPONSE RECEIVED No response suggests happy with plan or no adverse comments to make	No change proposed