Orcop Neighbourhood Development Plan 2021-2031

Consultation Statement

Regulation 14 consultation at the Parish Hall

DJN Planning Limited · May 2022 · For Orcop Parish Council

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1. INTRODUCTION

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

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

Format of the Consultation Statement

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

- The initial stages of work on the Plan, covering the designation of the Neighbourhood Area and setting up a Steering Group (section 2).
- A Call for Sites held to identify potential land suitable for housing (section 3).
- Residents' questionnaire survey (section 4).
- The Regulation 14 consultation on the draft NDP (section 5)
- The issues and concerns raised in response to the Regulation 14 consultation, and how they were addressed (section 6).

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

- Formation of a Steering Group comprising Parish Councillors and other parish residents.
- Regular progress reports (NDP updates) presented to the Parish Council.
- Posting of material online via an NDP tab on the Orcop Parish Council website at https://orcopparishcouncil.org/orcop-parish-council-neighbourhood-development-plan/. Documents referred to in this Consultation Statement can be found here. This includes notes of the Steering Group meetings, details of the Call for Sites process and technical assessments, results of the questionnaire survey, details of the Regulation 14 consultation, and the Parish Council NDP updates (14 in all).
- NDP updates also published in the Parish Magazine and circulated to all members on the 'orcop-alive' community online newsletter at https://groups.google.com/g/orcop-alive.
- Circulating printed NDP material to all households in the Neighbourhood Area at key stages in the process (the introductory leaflet, questionnaire survey, and Regulation 14 flyer/comment form).
- Posting NDP consultation material and other information on the parish notice boards, in the Parish Magazine, and on 'orcop-alive'.
- Public deposit of NDP documentation at the Parish Hall, Fountain Inn and Ross-on-Wye library.
- Questionnaire survey of residents.
- Consultation on the draft NDP held in accordance with Regulation 14 of the 2012 Regulations.

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

2. NEIGHBOURHOOD AREA DESIGNATION AND ESTABLISHING A STEERING GROUP

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

- Application to HC for designation of the Orcop Neighbourhood Area was made on 20 May 2013. HC carried out consultation on the proposed Neighbourhood Area from 6 June to 18 July 2013. No comments were received, and the application was approved on 18 July 2013.
- Following community discussions on the NDP project, an initial meeting of a Steering Group comprising Parish Councillors, Parish Clerk and other volunteers was held on 30 August 2017. The meeting was attended by five Parish Councillors, 15 members of the public and a planning consultant (Kirkwells).
- A first step was to produce and circulate a leaflet to households and businesses in the Neighbourhood Area announcing the NDP and seeking support and feedback. A copy of the leaflet is at Appendix 1.
- In May 2018, the Parish Council resolved to disband the Steering Group and progress the project instead through Extraordinary Parish Council or NDP meetings.

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

- How best to represent the views and consider the needs of Orcop parish including residents, the farming community and small businesses.
- How to accommodate development, including new housing to meet the requirements of the Herefordshire Local Plan Core Strategy, whilst maintaining quality of life for all in the parish.
- The scope of the NDP, including maintaining footpaths (PROWs), identifying common land, green spaces, design and materials, village character, brownfield sites, barn conversions and deliverability.

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

- Application for Neighbourhood Area designation.
- Seeking and obtaining advice from HC Neighbourhood Planning officers on the neighbourhood plan process.
- The establishment of an initial Steering Group comprising elected parish councillors and other members, and open to all in the community (the project was also managed directly by the Parish Council for a period).
- Obtaining grant funding and seeking professional support (initially from Kirkwells).
- Circulation of a leaflet to parish residents to publicise the NDP and invite views, with supporting information in the Parish Magazine.

3. CALL FOR HOUSING SITES

3.1 The Parish Council held a Call for Sites in June 2018. This resulted in the submission of 14 sites. These sites together with others identified in HC's SHLAA process, a total of 16 sites, were then assessed in terms of their suitability, availability and achievability by AECOM.[2] AECOM's conclusions were that nine of the sites were potentially suitable for allocation, with a combined total of 33-34 dwellings.

3.2 Following the Parish Council elections in May 2019, the Steering Group was re-constituted. A public meeting was held on 14 August 2019 to discuss the way forward with the project, including how to respond to AECOM's conclusions. This meeting was attended by Parish Councillors, 18 residents, a HC Neighbourhood Planning officer and a second prospective planning consultant (who was subsequently appointed).

3.3 AECOM's findings were discussed at this meeting with a question-and-answer session focussing on the robustness of their conclusions particularly with regard to local issues of wastewater treatment and drainage. This discussion led to a change in approach for the NDP project in that, responding to views expressed and on advice, it was decided to undertake a questionnaire survey of the community before finalising the approach to meeting the strategic housing requirement. The survey was undertaken in January 2020, and is described in section 4 of this Statement.

3.4 In the interim it was agreed that a letter should be issued to the landowners who responded to the Call for Sites exercise to update them on the current status of the NDP and more importantly provide then with feedback on AECOM's assessment of their respective sites. Local landowners who had submitted sites were where possible visited by Steering Group members in autumn-winter 2019/2020 to answer questions and verify information. The issues and concerns raised were fed in to a professional assessment of housing delivery options which was carried out by the planning consultant in spring/summer 2020.[3]

3.5 On consideration of the presented options, the Steering Group decided to pursue an approach to housing delivery based on assessing the local availability of services and facilities. The chosen approach took into account community issues and concerns expressed in the questionnaire survey, which asked specific questions about the location of, and constraints to, new housing and other development. The survey had highlighted the constraints on development posed by difficulties in achieving satisfactory foul and surface water drainage, particularly in and adjacent to Orcop Hill (the largest settlement in the Neighbourhood Area designated as a 'main focus' for housing development in the Local Plan Core Strategy).

3.6 During this period the COVID 19 pandemic was preventing public discussions of the ongoing work and so particular care was taken to ensure that Steering Group meeting notes and monthly updates were posted promptly and regularly to the website, to keep the community informed.

[2] AECOM, Site options and assessment, June 2019.
[3] DJN Planning, Housing delivery report, September 2020.

4. QUESTIONNAIRE SURVEY

4.1 The public meeting in August 2019 referred to agreed that the next step was to conduct a comprehensive questionnaire survey to ascertain resident's views on planning topics which might be addressed by the NDP.

4.2 The questionnaire was developed by the Steering Group and the planning consultant, taking account of issues raised to date and earlier work on the Parish Plan. On this basis, key themes for the survey were identified as: living in Orcop Parish; housing; traffic, transport and access; jobs and the economy; community facilities, and the environment.

4.3 The questionnaire asked 18 questions on these topics. Responses were sought against a range of multiple choices and as free-write comments. A further question gave an opportunity to add comment on any other matters thought to be relevant to the NDP. The survey concluded with three questions seeking information about respondents, including on age and place/length of residence.

4.4 Questionnaires were delivered by post to households within the Neighbourhood Area in January 2020. Advance notice of the survey was given via the Parish Council website, parish notice boards, Parish Magazine and 'orcop-alive'. The questionnaire included a map of the Neighbourhood Area and was accompanied by a covering letter, a set of frequently asked questions, and a freepost return envelope. The Parish Clerk co-ordinated the process and acted as a point of contact to answer any queries from residents and supply additional copies of the questionnaire if required.

4.5 Overall, 66 completed questionnaires were returned by the closing date (27 January 2020), a response rate of 38%.[4] The results were professionally analysed and published on the Parish Council website in the form of two reports.[5] Whilst it was intended to hold a public presentation of the results, this was precluded by the COVID19 pandemic. The NPD update in May 2020 to the Parish Council and in the Parish Magazine confirmed that the survey reports had been posted to the Parish Council website.

4.6 The questionnaire survey provided a wealth of information for consideration in the preparation of the NDP. Land use and development issues and concerns identified by the community in their survey responses were addressed by the Steering Group and the planning consultant through the formulation of planning policies in the draft NDP. Each of the NDP's planning policies explains how responses to the questionnaire survey have been addressed and taken into account in policy formulation. Community views also informed the approach taken to housing delivery (see section 3). Finally, the survey highlighted a number of non-land use issues notably road safety and speeding; these have been addressed in the draft NDP as Community Actions.

[4] Based on the number of households in the Neighbourhood Area at the time of the Census 2011 (173).
[5] DJN Planning, Questionnaire survey 2020 Results Report and Comment Listings Report, April 2020.

5. CONSULTATION ON THE DRAFT PLAN

5.1 The draft NDP was approved for public consultation by the Parish Council on 17 November 2021. Consultation was carried out in accordance with Regulation 14 of the Neighbourhood Planning (General) Regulations 2012. The consultation ran for eight weeks from 9.00 a.m. on 6 December 2021 to 5.00 p.m. on 31 January 2022.

5.2 The Environmental Report and the Appropriate Assessment Report which had been provided by HC to the Parish Council in November 2021 were also published for consultation.

5.3 The draft NDP included a pre-submission consultation and publicity notice, setting out the requisite details of the consultation. The draft NDP, a flyer/comments form, the Environmental Report and the Appropriate Assessment Report were all posted on the Parish Council website.

5.4 Ahead of the start of the consultation period the flyer/comment form was posted to households and businesses throughout the Neighbourhood Area. The flyer explained how and where the draft NDP could be viewed and provided an opportunity to make comments. Further publicity was given in the Parish Magazine and by poster in the parish notice boards and social media. Printed copies of the draft NDP were deposited for inspection at the Parish Hall (see front cover), the Fountain Inn and Ross-on-Wye library. Printed copies were also available on request from the Parish Clerk.

5.5 Comments could be made by hand to the collection boxes at the Parish Hall and the Fountain Inn, by post or email to the Parish Clerk, or at a drop-in event at the Parish Hall on 11 December 2021 between 11.00 a.m. and 2.00 p.m.

5.6 A initial list of consultees was provided by HC and then added to by the planning consultant and the Steering Group, having regard to the consultation bodies specified in paragraph 1 of Schedule 1 of the 2012 Regulations. The final list is at Table 1. Consultation was by email or letter, sent by the Parish Clerk at the start of the consultation period and explaining where the Plan could be viewed and how and by when to make comments.

5.7 The drop-in event on 11 December was designed to give an opportunity for local residents to seek further details on any aspect of the NDP, and to make comments. The event was publicised in the NDP Regulation 14 publicity material. A set of display boards was prepared (see Appendix 2) and copies of the draft NDP and comment forms were available. The session was staffed by members of the Steering Group, other Parish Councillors and the planning consultant, with refreshments provided. The event was attended by 12 residents.

5.8 Copies of the consultation and publicity notice, flyer/comment form, poster and the display material used for the drop-in event are at Appendix 2.

Table 1: consultees on the draft NDP

Organisations
Campaign to Protect Rural England
Diocese of Hereford
Dwr Cymru Welsh Water
English Heritage
Environment Agency
Education Funding Agency
Forestry Commission England
Natural Resources Wales
Hereford and Worcester Chamber of Commerce
Herefordshire Council (Neighbourhood Planning team and ward councillor)
Herefordshire Nature Trust
Herefordshire Primary Care Trust
National Highways
Historic England
Homes England
National Grid
National Trust
Natural England
Network Rail (West)
Hereford Travellers Support Group
RWE Npower Renewable
Severn Trent Water
The Coal Authority
Western Power Distribution
Woodland Trust
Adjoining Parish Councils
Kilpeck Parish Council
Much Dewchurch Parish Council
Llanwarne and District Group Parish Council
St Weonards Parish Council
Garway Parish Council
Local consultees
British Legion
Fountain Inn
Orcop Parish Hall
Orcop Baptist Church
Women's Fellowship
Evergreens
Youth Group Tear Fund
Singing Tree Choir
Beaumonts Garage
Springfield Stables
10 residents/landowners

6. RESPONSES TO THE CONSULTATION

Issues and concerns raised

6.1 Consultation body responses were received from:

- HC service providers: Neighbourhood Planning, Strategic Policy, Development Management, Transportation and Highways, and Environmental Health.
- Coal Authority.
- Dwr Cymru Welsh Water.
- Environment Agency.
- National Grid.
- Natural England.

6.2 Comments were also received from 12 residents and one from an agent for a local resident. All comments are reported verbatim in the Response Log at Appendix 3. Personal information has been anonymised. A response is provided to each comment and any necessary amendments to the draft NDP are detailed.

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

- HC Strategic Policy advised they considered the NDP to be in general conformity with the policies of the Local Plan Core Strategy.
- HC Neighbourhood Planning welcomed the NDP's inclusion of an exception case explaining the approach to housing delivery.
- HC Development Management suggested improvements to several policies.
- HC Transportation and Highways made several technical suggestions and sought inclusion of further requirements re active travel.
- Natural England advised that they concurred with the conclusions of the NDP's Appropriate Assessment, provided that all the proposed mitigation measures were secured (the Appropriate Assessment recommended the inclusion of a nutrient management policy and that relevant planning applications should be required to be supported by a foul and surface water management strategy).
- An agent acting for a local resident and landowner suggested two sites for housing at Orcop Hill.
- Resident issues and concerns were raised in respect to the use of Building with Nature standards, impact of development on privacy, rural tourism proposals, community development including for a 'learning centre', village recreational facilities, green space at Copywell, health and well-being, landscape and key views, and the use of package treatment plants for wastewater.
- Other resident concerns were raised on existing highway conditions, lack of current provision for pedestrians and cyclists, lack of public car parks and passing places, HGV volumes, sale of woodland.

Considering and addressing issues and concerns

6.4 All comments were passed to the planning consultant for review and to provide a recommended response, including amendments to the draft NDP. Table 2 provides a summary of the resulting principal amendments to the draft NDP. Full details may be found at Appendix 3.

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

Consultee	Change made
HC Neighbourhood Planning	Update re Housing Market Area Needs Assessment July 2021.
HC Development Management	Additions and amendments to policies ORC2, ORC8, ORC9, and ORC12 to improve clarity.
HC Transportation and Highways	Additions and amendments to reference strategic policy SS4 and development control requirements, and to policies ORC10, ORC12 and ORC13 re pedestrian, cycle and public transport provision.
Natural England	Additions and amendments to policies ORC1, ORC4, ORC5 and ORC8 and supporting text re achieving nutrient neutrality and for planning applications to be supported by a foul and surface water management strategy.
Resident 4	Addition to policy ORC4 re requiring adherence to Building with Nature standards.
Resident 5	Additions to reference privacy in policy ORC4 and to DEFRA General Binding Rules in explanatory text to policy ORC5.
Resident 9	Additional Community Action re Community hub.
Resident 10	Additions and amendments re Copywell Local Green Space, objectives and Community Action on Community development.

APPENDIX 1

Introductory leaflet

Orcop Parish Council Neighbourhood Plan

We will be producing a Neighbourhood Plan during the coming months.

It is an essential part of the process that as many residents and stakeholders as possible participate in the preparation of the plan.

If you are a resident of Orcop or own a business based in Orcop Parish you are eligible to be a member of the Neighbourhood Plan Steering Group.

The Parish Council will oversee and authorise all elements of the **Neighbourhood Plan**

The Next Meeting of the Steering Group will be Held on:

Wednesday 25th October 2017 at

Orcop Village Hall 7.30pm

If you are unable to attend the meeting but have some views on development in the parish the please contact or write to the parish clerk **By Saturday 14th October 2017**

Mrs Kath Greenow
Parish Clerk
Orcop Parish Council
Hackford House
Dinedor
Hereford
HR2 6PD
Email:clerk@orcopparishcouncil.org

Information on the Neighbourhood Plan and further NDP working group meetings will be put on the Parish Council website
orcopparishcouncil.org

What is a Neighbourhood Development Plan?

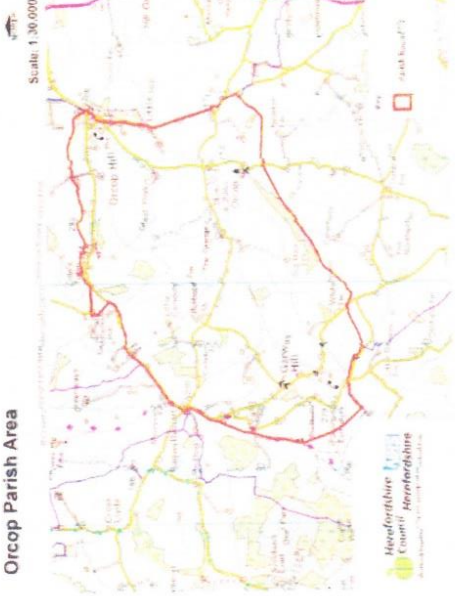
A Neighbourhood Development Plan (NDP) sets out local level planning policies for the development and use of land in a Parish.

Orcop NDP

In Orcop, our NDP has to provide for some new housing in line with Herefordshire Core Strategy's growth target for our rural area. Our Plan could consider issues like where new homes should be built, and what they should look like, and how we can protect and enhance our environment and facilities.

Our Plan's policies and proposals have to be supported by robust technical evidence as well community feedback and we need your help to make sure Orcop's NDP reflects local priorities.

Orcop Parish Area



APPENDIX 2

Regulation 14 consultation material

Pre-submission consultation and publicity notice

Flyer/comment form

Poster

Display boards for drop-in event 11 December 2021

Pre-submission consultation and publicity notice

A public consultation on the draft Orcop Neighbourhood Development Plan held in accordance with Regulation 14 of the Neighbourhood Planning (General) Regulations 2012 will start at 9.00 a.m. on Monday, 6 December 2021 for a period of eight weeks ending at 5.00 p.m. on Monday, 31 January 2022.

Where you can inspect the draft Neighbourhood Development Plan

The draft Neighbourhood Development Plan may be inspected:

- on the Parish Council website at https://orcopparishcouncil.org/.
- at the Parish Hall and the Fountain Inn, Orcop Hill.
- at Ross-on-Wye Library, Cantilupe Road, Ross-on-Wye, Herefordshire HR9 7AN.
- on request from the Clerk to Orcop Parish Council, by email to clerk@orcopparishcouncil.org or telephone 01981251887.

Supporting documents are available on the Parish Council website.

How to make comments on the draft Neighbourhood Development Plan

Comments must be made in writing and include the name and address of the person making the comments. Please make comments as specific as possible, quoting the relevant policy or paragraph number(s). All comments will be publicly available (personal information will not be published).

A form for making comments can be downloaded and printed from the website, requested from the Parish Clerk, or collected from any of the above locations where the Plan can be inspected.

Send us your comments:

- by hand to the collection boxes at the Parish Hall and the Fountain Inn.
- at the drop-in session at the Parish Hall on Saturday 11 December 2021 between 11 a.m. and 2 p.m.
- by post to the Clerk to Orcop Parish Council, Rosemary Cottage, Madley, Hereford HR2 9LS.
- by email to the Clerk at clerk@orcopparishcouncil.org.

If you have any questions, please telephone either Margaret Serle on 01981 540536/07585911447 or Barry Shaw on 01981 540871/07768841541.

All comments must be received by 5.00 p.m. on Monday 31 January 2022. These will be considered by the Parish Council and will help shape the final Neighbourhood Development Plan.

Public Consultation:
MONDAY 6 DECEMBER 2021 – MONDAY 31 JANUARY 2022

Dear Parishioner,

As you know, we have been preparing a Neighbourhood Development Plan to guide how our Parish will develop in the next few years. We have now reached the stage where we have a draft Plan – and we want to know what you think.

To find out more, come along to our drop-in session at the **Parish Hall** on **Saturday 11 December 2021 between 11 a.m. and 2 p.m.** You can also read the draft Plan on-line at https://orcopparishcouncil.org/, and there are copies at the Parish Hall, the Fountain Inn and Ross-on-Wye library. For a printed version, contact the Parish Clerk, either by email clerk@orcopparishcouncil.org or telephone 01981 251887.

You can use this form to give us your comments. Please return it using the enclosed pre-paid envelope or:

- to the collection boxes at the Parish Hall and the Fountain Inn, or at the drop-in session.
- by post to the Orcop Parish Clerk, Rosemary Cottage, Madley, Hereford HR2 9LS.
- by email to the Clerk at clerk@orcopparishcouncil.org.

Please include your name and address.* Additional copies of the form can be downloaded and printed from the Parish Council website, requested from the Parish Clerk or collected from the Parish Hall, the Fountain Inn and Ross-on-Wye library. If you have any questions, please telephone either Margaret Serle on 01981 540536/07585911447 or Barry Shaw on 01981 540871/07768841541.

All comments must be received by 5.00 p.m. on Monday 31 January 2022. Thank you.

Yours faithfully,
Councillor Ben Thomas, Chair of the Parish Council
Councillor Margaret Serle, Chair of the NDP Steering Group.

Your details:*

Name:	
Address:	
Email:	

Please give us your comments overleaf.

* The personal information you provide on this form will be processed in accordance with the Privacy Notice on the Parish Council website. It will be used only for the preparation of the Neighbourhood Development Plan. Personal information will not be published.

Please give us your comments below. All comments will be publicly available.

Which part of the Plan are you commenting on? Please tell us the page number, paragraph number, or policy.	Are you supporting, objecting or just making a comment?	Comments and/or suggested changes

Do you have any general comments?

Thank you – and don't forget please return this form by Monday 31 January 2022.

Orcop Neighbourhood Development Plan

The draft Neighbourhood Development Plan has now been published – and we want your views.

You can read the Plan and find out how to respond:

- At https://orcopparishcouncil.org/.
- By coming along to our drop-in session at the Parish Hall on Saturday 11 December between 11 a.m. and 2 p.m.
- At the Parish Hall, the Fountain Inn and Ross-on-Wye Library.
- By contacting the Clerk at clerk@orcopparishcouncil.org or telephone 01981251887.

Let us have your comments by 5.00 p.m. on Monday 31 January 2022

We look forward to hearing from you
Orcop Parish Council

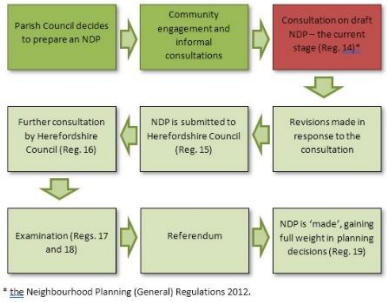
Display boards for drop-in event 11 December 2021

Orcop Neighbourhood Development Plan

Preparing the NDP

The draft NDP has been prepared by a Steering Group of Parish Councillors and other volunteers.

Its publication for public consultation marks an important step in the preparation process.

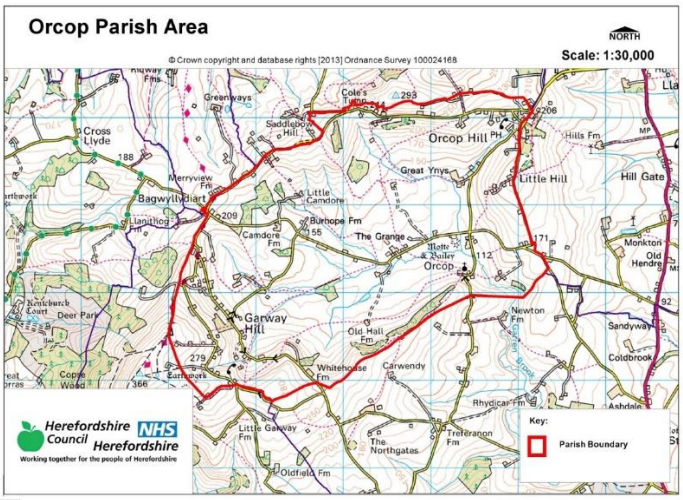


* the Neighbourhood Planning (General) Regulations 2012.

Now, we want to know what you think. Please let us have your comments by **5 pm on Monday 31 January 2022.**

Board 1

Orcop Neighbourhood Development Plan



Board 2

Orcop Neighbourhood Development Plan

Draft planning policies

The Plan proposes policies on the following topics:

- Landscape and biodiversity
- Key views
- Heritage
- Design
- Wastewater treatment
- Surface water and flood risk
- Renewable and low carbon energy projects
- Settlement boundaries and site allocation
- Housing mix
- Community facilities
- Rural businesses
- Holiday accommodation
- Agricultural and forestry development

Read on to find out more on key topics – for more detail, you can see the draft Plan online at https://orcopparishcouncil.org/.

Board 3

Orcop Neighbourhood Development Plan

New houses – how many and what type?

We've looked hard to find land for new housing whilst also taking account of the environment, the availability of services and rural transport.

New housing is proposed on land west of Birch View at Orcop Hill. This leaves a slight shortfall on the overall requirement – justified when taking account of local factors such as transport and infrastructure.

ORCOP NEIGHBOURHOOD AREA HOUSING REQUIREMENT 2011-2031	26
Dwellings completed 2011 – April 2021	5
Dwellings with planning permission at April 2021	4
Policy ORC8 Land west of Birch View, Orcop Hill	3
Rural area dwellings in scope of LPCS policy RA3	5
Windfall allowance	5
TOTAL HOUSING DELIVERY	**22**

Housing delivery, Orcop Neighbourhood Area 2011-2031

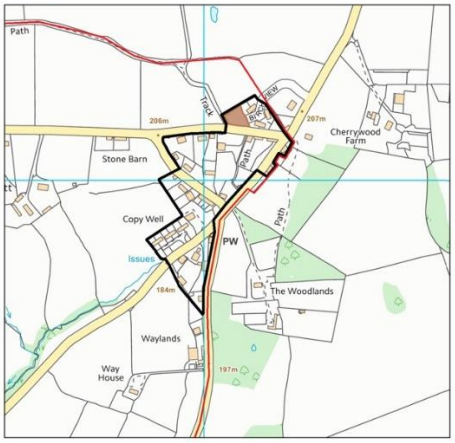
The Plan also supports housing of a size and type to meet local needs. The main requirement is for 2-bedroom and 3-bedroom properties, with little need for larger homes.

Houses are also sought for first-time buyers, young families and older people. Live/work units and opportunities for self-build will be encouraged.

Board 3A

Orcop Neighbourhood Development Plan

Orcop Hill settlement boundary and new housing



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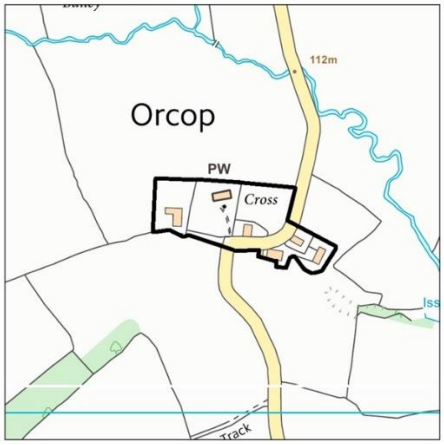
Board 4

Orcop Neighbourhood Development Plan

Orcop settlement boundary



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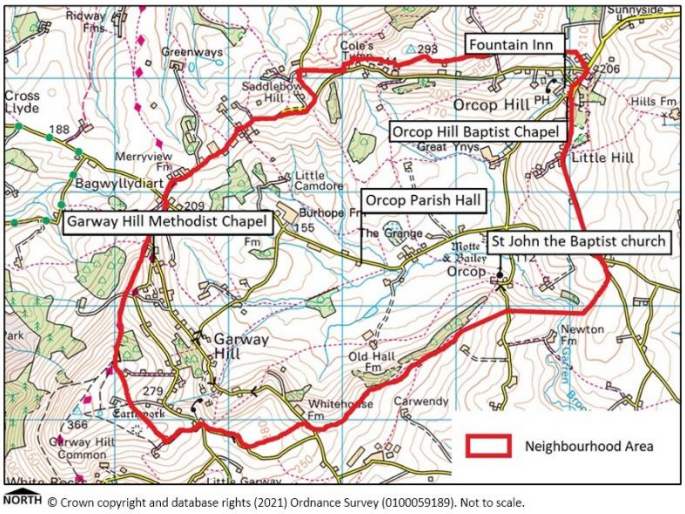
There is a presumption of being able to develop land within a settlement boundary. Development is much more restricted outside settlement boundaries.

Board 5

Orcop Neighbourhood Development Plan

Community facilities

The Plan lists community facilities in the Neighbourhood Area for protection.



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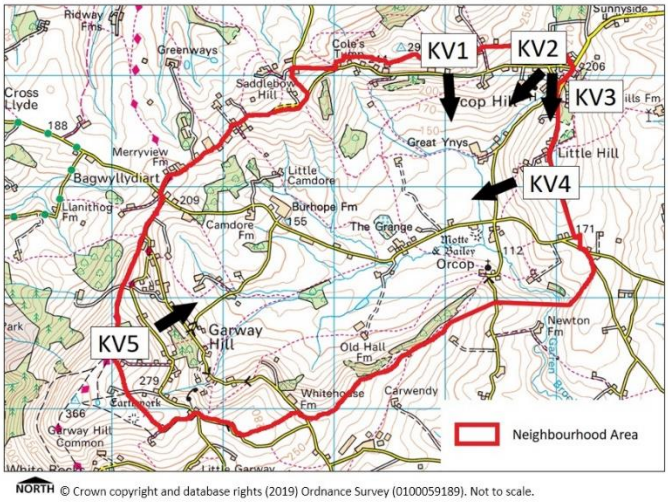
Board 6

Orcop Neighbourhood Development Plan

Key views

Key views of the landscape are identified for protection.



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Board 7

Next steps

- Close of consultation: **5 pm on Monday 31 January 2022.**
- All comments independently assessed
- Steering Group then Parish Council decides how to revise the draft
- Revised NDP submitted to Herefordshire Council
- Further six-week public consultation
- Independent Examination
- Referendum
- Adoption – NDP then has full weight when Herefordshire Council determines planning applications

Board 8

Appendix 3

Regulation 14 consultation Response Log

Part 1: Comments from consultation bodies

Part 2: Community and other comments

Abbreviations

AA: Appropriate Assessment November 2021
HC: Herefordshire Council
LPCS: Herefordshire Local Plan Core Strategy adopted 16 October 2015
NA: Neighbourhood Area
NPPF: National Planning Policy Framework 2021
NDP: Neighbourhood Development Plan
NPPG: National Planning Practice Guidance
SAC: River Wye Special Area of Conservation
SHLAA: Strategic Housing Land Availability Assessment

Part 1: Comments from consultation bodies

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to draft Orcop NDP
Avison Young for National Grid	NDP	C	National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators across England, Wales and Scotland. National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use. National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States. Proposed development sites crossed or in close proximity to National Grid assets: An assessment has been carried out with respect to National Grid's electricity and gas transmission assets which include high voltage electricity assets and high-pressure gas pipelines. National Grid has identified that it has no record of such assets within the Neighbourhood Plan area. National Grid provides information in relation to its assets at the website below. • www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/ Please also see attached information outlining guidance on development close to National Grid infrastructure. Distribution Networks Information regarding the electricity distribution network is available at the website below: www.energynetworks.org.uk Information regarding the gas distribution network is available by contacting: plantprotection@cadentgas.com Further Advice Please remember to consult National Grid on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets.	Comment noted.	No change.
HC Neighbour-hood Planning	NDP	C	It is noted that the proportional growth target is 26 dwellings to be provided between 2011-2031. This is the equivalent of between 1-2 houses per annum over the Core Strategy plan period. It is noted that there is a deficit in the table at paragraph 5.5 with the provision of 22 dwellings accounted for. The	Comment noted. The exception case provided in Appendix B of the NDP sets out the justification for the housing delivery position.	Update para. 5.15 and Table 2 as per the latest Housing Market Area Needs Assessment July 2021.

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<tr><td></td><td></td><td></td><td>justification in Appendix B is helpful as to why there is a deficit in the case of this NDP. As long as this is set out clearly which sites have been assessed in the Aecom report then that will assist the process.
Para 5.15 refers to the Local Housing Market Needs Assessment 2013 but it is worth noting that this evidence has been superseded by the recent Herefordshire Housing Market Needs Assessment July 2021. This evidence also refers to the updated need for the Ross on Wye Housing Market Area.

[NB no comments received from HC Strategic Housing, Landscape/archaeology/conservation, Economic Development, Education, Property Service, Parks and Countryside, and Waste.
Environmental Health (noise/air) had no observations to make].</td><td>Since the NDP was drafted an updated Housing Market Area Needs Assessment has been issued by HC. The NDP should be updated accordingly.</td><td></td></tr>
<tr><td>HC Strategic Policy</td><td>NDP</td><td>C</td><td>The plan is in general conformity with the policies of the Core Strategy and Strategic Planning therefore raises no objections to this draft NDP.

<table>
<tr><th>Draft Neighbour-hood plan policy</th><th>Equivalent CS policy(ies) (if appropriate)</th><th>In general conformity (Y/N)</th><th>Comments</th></tr>
<tr><td>Policy ORC1</td><td>LD1 Landscape and townscape
LD2 Biodiversity and geodiversity
LD3 Green infrastructure
SD4 Wastewater treatment and water quality</td><td>Y</td><td></td></tr>
<tr><td>Policy ORC2</td><td>N/A</td><td>Y</td><td></td></tr>
<tr><td>Policy ORC3</td><td>LD4 Historic environment and heritage assets</td><td>Y</td><td></td></tr>
<tr><td>Policy ORC4</td><td>SD1 Sustainable design and energy efficiency
LD1 Landscape and townscape
MT1 Traffic management, highway safety and promoting active travel</td><td>Y</td><td></td></tr>
</table></td><td>Comment noted.</td><td>No change.</td></tr>
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<tr><td>Policy ORC5</td><td>SD4 Wastewater treatment and water quality</td><td>Y</td><td></td></tr>
<tr><td>Policy ORC6</td><td>SD3 Sustainable water management and water resources</td><td>Y</td><td></td></tr>
<tr><td>Policy ORC7</td><td>SD2 Renewable energy</td><td>Y</td><td></td></tr>
<tr><td>Policy ORC8</td><td>N/A</td><td>Y</td><td></td></tr>
<tr><td>Policy ORC9</td><td>H1 Affordable housing Policy
H3 Ensuring a range and mix of housing types</td><td>Y</td><td></td></tr>
<tr><td>Policy ORC10</td><td>SC1 Social and community facilities</td><td>Y</td><td></td></tr>
<tr><td>Policy ORC11</td><td>RA6 Rural economy</td><td>Y</td><td></td></tr>
<tr><td>Policy ORC12</td><td>E4 Tourism</td><td>Y</td><td></td></tr>
<tr><td>Policy ORC13</td><td>RA6 - Rural economy
LD1 Landscape and townscape
LD2 Biodiversity and geodiversity
SD4 Wastewater treatment and water quality
MT1 Traffic management, highway safety and promoting active travel</td><td>Y</td><td></td></tr>
</table>
</td><td></td><td></td></tr>
<tr><td>HC Development Management</td><td>NDP</td><td>C</td><td>Can consideration be given for a quick policy reference section at the front of the NDP to enable officer (and other users to more quickly identify relevant policies).</td><td>This is already provided by means of the List of Policies on NDP page 1.</td><td>No change.</td></tr>
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	Housing delivery	C	From a more strategic point of view, it is interesting to see an undersupply of housing land, compared to CS figures being proposed. It may well be justified here given drainage constraints, a lack of services and heritage concerns but might this create a tension in terms assessing housing need in the area, especially if the Council lose its current 5 YHLS? There is a sense/concern in which this could undermine the settlement boundary if it does not satisfy NPPF paragraph 14 in regards to identifying required supply.	NPPG encourages neighbourhood planning bodies to plan to meet their housing requirement. The process of housing site search and assessment carried out for the NDP has not been able to identify developable sites to meet the LPCS figure. This position is fully explained in the NDP and reflects the various constraints identified in the comment. In the circumstances referred to, planning permission would be granted unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits. However, the protection afforded by NPPF para. 14 only applies for a two-year period from the date of the NDP being made.	No change.
	Policy ORC8	O	With regard to Policy ORC8 – settlement boundary, the pre-amble states that land outside the settlement boundary should be considered countryside but this should also be made expressly clear within the policy text. Such as "land outside of the settlement boundaries is defined as countryside where residential development is restricted to exceptional circumstances only, in accordance with Core Strategy RA3" – or something to that effect as there is no exceptions policy in the NDP. Alternatively it could benefit from an exceptions policy to support and reflect ORC8 as RA3 does to RA2.	Agreed.	Add to the first paragraph of policy ORC8: "Land outside the settlement boundaries is defined as countryside where residential development is restricted to exceptional circumstances only, in accordance with Local Plan Core Strategy policy RA3.".
	Policy ORC8	C	Has the potential of including the land to the north of the access road to Birch View been considered as this has had a permission in the past and could provide for a small contribution without significant impacts.	The potential of land to the north of Birch View was considered in the Housing Delivery Report. The Report recognises that whilst there was potential to accommodate housing development, most of the site is in an adjoining parish, outside the Orcop Neighbourhood Area. Whilst mechanisms to	No change.

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				enable this capacity to be taken into account were considered in the Report (Option A), the Steering Group had reservations about the deliverability and suitability of the land involved and this option was not pursued.	
	Policy ORC9	C	Policy ORC9 – housing mix – it is hard to discern a clear action here when assessing proposals of larger dwelling houses. The second paragraph is a good aspirational policy but difficult to apply as it lacks clarity and action. It is noted that the Welsh Newton and Llanrothal NDP had a policy preventing 4 bed dwellings and this has been supported on appeal so if +4 bed dwellings are not wanted the policy needs to say so.	The evidence base does not support a policy prohibiting larger (4 bedrooms and above) dwellings. In the questionnaire survey, 30% of respondents preferred such larger properties (cf. 45% against). The latest Housing Market Area Needs Assessment July 2021 indicates a requirement for 20% of dwellings to have 4+ bedrooms in the wider rural Housing Market Area. However, an amendment to the second para. of the policy is suggested to give greater specificity and to better align with the July 2021 Assessment.	Amend second para. of policy ORC9 to read: "Development proposals which provide housing of a suitable size, tenure and style to meet local needs will be supported. There is a particular need in the Neighbourhood Area for: • Smaller family housing of 2- or 3-bedrooms • Housing designed to meet the needs of older people including bungalows. Proposals to provide work/live units and for self-build housing will also be supported.".
	Policy ORC12	O	Policy ORC12 – Holiday accommodation – On a general point, there is a desperate need for updated CS policy on sustainable tourism and what that means for Herefordshire but in relation to this NDP policy there are a few issues from a DM perspective: • Is the policy seeking to promote more temporary structures rather that "semi-permanent" or presumably permanent structures? If so this could be explicit within the policy text and definitions ought to be provided to provide clarity. The final sentence (*Proposals for the development of sites containing semi-permanent mobile homes and chalets used for all year-round residential purposes will not be supported)* is not clear and there could be difficulty in understanding what is and is not supported; • If the policy is seeking to only support accommodation that is contained within temporary structures such as shepherd huts then it needs to rule out the development of permanent structures explicitly;	Amendments are made to clarify the scope and application of the policy.	Amend policy ORC12 to read: "Proposals for the development of new permanent holiday accommodation and for the change of use of land for the siting of caravans* should: 1. be of a scale and design which is appropriate to their location; and 2. avoid isolated settings in the open countryside; and 3. demonstrate that the impacts on landscape character, residential amenity, highway safety and capacity and public rights of way are

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			• It does not deal with the conversion of existing structures to be used for tourist accommodation; • The second point *(new development or the siting of caravans in isolated settings is avoided)* difficult to understand why this would only apply to caravans and not permanent buildings or structures?; • The policy does not tackle the change of use of land which is often the elements that are being permitting not the structures themselves when they are chalets, caravans, yurts/tents etc.		acceptable, taking account of any ancillary equipment which is also proposed; and 4. make acceptable provision for wastewater treatment, surface water drainage, vehicular access to the highway, and for active travel including cycle parking. * any structure designed or adapted for human habitation which is capable of being moved from one place to another and any motor vehicle so designed or adapted.”. Amend para. 6.6 to read: “The rugged landscape and tranquil nature of the Neighbourhood Area mean that it is an attractive destination for tourists and holidaymakers. The Local Plan Core Strategy encourages more overnight stays in the County (policy E4 *Tourism*). Such accommodation may arise from the change of use or conversion of existing buildings; new built development; or the change of use of land to allow the siting of caravans or similar. The first of these is governed by Local Plan Core Strategy policy RA5 *Re-use of rural buildings*. Policy ORC12 addresses new built development of a permanent nature, such as log cabins and chalets, and the change of use of land to allow the siting of temporary accommodation such as shepherd’s huts and touring caravans.”. Add to para. 6.8: “Proposals for permanent residential occupation will be considered in

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					accordance with relevant housing policies of the Development Plan.”.
	Policy ORC2	O	The policies regarding protected views (ORC2) are welcomed but could consideration be given for excluding householder type development within the viewpoints from needing LVIA as this might be a little onerous for such small scale development within existing residential curtilages.	Agreed.	Amend the final para. of policy ORC2 to read: “Where a development proposal (other than householder development) within the …”.
	Policy ORC5	S	Similarly ORC5 is well written and clearly arises from the huge controversy over the drainage constraints at Orcop Hill in particular and it provides a really good commentary on the approach, without going too far. One hopes that cess pools will be prevented by legislation in due course.	This support for the policy is welcomed.	No change.
	Policy ORC3	O/S	Finally ORC3 appears largely to simply rehearse the heritage tests set out on the NPPF which isn`t completely necessary. The identification of non-designated heritage assets is welcome though.	There is merit in importing NPPF requirements into the NDP as planning policy, these provisions not otherwise being included within the LPCS.	No change.
HC Transporta-tion and Highways	NDP	C	General comments: • Need to highlight not only Policy MT1 from the Core Strategy but SS4 - Movement and transportation. • Transport Assessments and statements are dependent on size of the development however a review of the impact of the development on the highway should look to be submitted • Sustainable travel should also be accommodated with cycle storage and if a business has other provisions like showers and lockers. Pedestrian safety should also be highlighted especially on rural lanes. • Should also include the HC Highways design guide, this should point developments to meet highway design specification including parking and turning.	Additional reference to these matters can be included in the supporting text to policy ORC4.	Add explanatory text to include reference to: LPCS policy SS4 *Movement and Transportation;* Transport Assessments/Statements; provision for pedestrians and cyclists; and to HC’s Highways Design Guide for New Developments.
	Policy ORC10		Is there any way to include a reference to developers providing infrastructure / measures that encourage access by active travel. It is appreciated geography is difficult, but for community facilities it might be appropriate for getting around the parish. This would then be consistent with para 4 of ORC11 later on (PDF) page 40.	Agreed.	Amend policy criterion to include reference to proposals making full use of available opportunities to improve and encourage access by foot, cycle or public transport.
	Policy ORC12		Bearing in mind walking and cycling are significant tourism activities in the county. It would be useful if there was some requirements for active travel access and cycle parking here too (as per ORC4 para 4).	Agreed.	Add to policy ORC12 to require provisions for active travel and cycle parking.
	Policy ORC13		Developers should also be encouraged to explore opportunities to include safe off road active travel links within the development.	Agreed.	Amend policy criterion 4 to encourage proposals to provide safe

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					off-road active travel links within developments.
	Community Actions CA5	S	To support 7. DELIVERING THE NEIGHBOURHOOD DEVELOPMENT PLAN, Community actions, para 7.6, Ref. CA5 on PDF p 46). Note para 7.7 The Community Actions do not form part of the Neighbourhood Development Plan and do not constitute planning policy.	This support for the Community Action on walking and cycling is welcomed.	No change.
HC Environment-al Health (Environment-al Protection – contaminated land)			Regarding policy '*ORC8: Land west of Birch View, Orcop Hill allocated for the development of around three new dwellings'* indicated in brown on Plan 6. A review of Ordnance survey historical plans indicate the allocated site appears to have had no previous historic potentially contaminative uses. 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.	Comment noted.	No change.
Coal Authority	NDP	C	Thank you for consulting The Coal Authority on the above. Having reviewed your document, I confirm that we have no specific comments to make on it.	Comment noted.	No change.
Dwr Cymru Welsh Water	NDP	S	Thank you for consulting Welsh Water on the Neighbourhood Development Plan. Whilst there is a small public Wastewater treatment works (WwTW) serving part of Orcop Hill, this is unlikely to have the capacity to serve further development and in any event is some distance away from the proposed allocation. Accordingly, it will require private wastewater treatment. On this matter, we welcome and applaud the provisions of Policy ORC5 Wastewater Treatment. With regard to providing the proposed allocation with a water supply, there is a water main in the adjacent road from which a supply can be taken. I trust the above is useful, but if you do require any further nformation please let me know.	This support for the NDP and the information provided is welcomed.	No change.
Environment Agency	NDP	C	I refer to your email of the 6 December 2021 in relation to the Regulation 14 Orcop Neighbourhood Development Plan (NDP). We have also received a separate consultation from Herefordshire Council with the associated Environmental Report and Appropriate Assessment (AA) and I have copied them into this response. I acknowledge the EA Pro Forma you attached with your email. As part of the adopted Herefordshire Council Core Strategy updates were made to both the Strategic Flood Risk Assessment (SFRA) and Water Cycle Strategy (WCS). This evidence base ensured that the proposed development in Hereford City, and other strategic sites (Market Towns), was viable and achievable. The updated evidence base did not extend to Rural Parishes at the	Comment noted.	No change.

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			NDP level so it is important that these subsequent plans offer robust confirmation that development is not impacted by flooding and that there is sufficient waste water infrastructure in place to accommodate growth for the duration of the plan period. Herefordshire Council are shortly to begin the Local Plan review process including updates to the evidence base. **Flood Risk:** We would not, in the absence of specific sites allocated within areas of fluvial flooding, offer a bespoke comment on flood risk at this time. However, it should be noted that the Flood Map provides an indication of 'fluvial' flood risk only. You are advised to discuss matters relating to surface water (pluvial) flooding with the drainage at Herefordshire Council. **River Wye SAC Catchment:** It is noted that Orcop falls within the Lower Wye catchment area and, although this area is not failing its water quality objectives at present, an AA has been undertaken in light of recent comments from Natural England (NE). As confirmed within the AA document the most significant issue within the River Wye SAC Catchment (included the River Lugg) relates to water quality and the potential impact of policies and site allocations within the NDP's. NE are the primary statutory consultation body for AA's and, ultimately, they would need to be satisfied that there is reasonable certainty to take forward the Policies and site allocation in the NDP in discussion with Herefordshire Council. We have previously provided comment on similar NDPs' with a view to ensuring a robust submission and that development can be achieved without impact on the integrity of the SAC, primarily within the Lugg Catchment. In this instance, as stated above, Orcop falls in the Lower Wye Catchment and in an area that is not currently failing its water quality objectives. Therefore we would raise no concerns at this time.		
Natural England	NDP	O	Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. **European sites – River Wye Special Area of Conservation** The Orcop Neighbourhood Plan allocates housing sites that are within the catchment of the River Wye SAC (Land west of Birch View, Orcop Hill). Natural England notes that your authority, as competent authority, has undertaken an Appropriate Assessment of the proposal, in accordance with Regulation 63 of the Conservation of Species and Habitats Regulations 2017 (as amended). Natural England is a statutory consultee on the appropriate assessment stage of the Habitats Regulations Assessment process, and a competent authority should have regard to Natural England's advice.	Comment noted. In assessing the implications of the NDP for the integrity of the River Wye SAC the AA recommends that additional wording is added to policies ORC5 and to the site allocation policy ORC8, in the form of a nutrient neutrality policy and to the need for an agreed foul and surface water management strategy with regards to water quality. These additional references are agreed although NDP policies already refer to the need for management	Policy ORC1: delete "of the Neighbourhood Area" in the policy introduction. Amend criterion 3 to read: "avoiding adverse effects on the River Wye Special Area of Conservation (SAC) and species of European importance. Development must be shown not to have an adverse effect on the SAC. In particular, planning permission will only be granted if clear and convincing evidence is provided which shows that the proposed

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			Your appropriate assessment concludes that your authority is able to ascertain that the proposal will not result in adverse effects on the integrity of any of the sites in question. Having considered the assessment, and the measures proposed to mitigate for all identified adverse effects that could potentially occur as a result of the proposal, Natural England advises that we concur with the assessment conclusions, providing that all mitigation measures are appropriately secured in any planning permission given. Whilst we agree with the overall conclusion, we suggest consideration be given to the type of mitigation and relevance of the mitigation proposed in the Appropriate Assessment. Further general advice on the consideration of protected species and other natural environment issues is provided at Annex A. Should the proposal change, please consult us again.	strategies for wastewater (policy ORC5) and surface water (ORC6). To avoid repetition and aid clarity, it is suggested that these policies be referred to in the site allocation policy and in policy ORC4 (design). Similarly, policy ORC1 already addresses the River Wye SAC and it would be logical to include requirements for nutrient neutrality here, with cross references in policies ORC4, ORC5 and the site allocation policy.	development would not increase nutrient inputs to the SAC. This could include the delivery of mitigation measures to make a proposal nutrient neutral. Reference should be made to Herefordshire Council's Phosphate Calculator and associated guidance. There should be no adverse effects on the water quality of the Garren Brook and its tributaries; and". Associated amendments/additions to explanatory text. Add new criterion to policy ORC4: "demonstrating nutrient neutrality in accord with policy ORC1, and providing acceptable arrangements for the treatment of wastewater in accord with policy ORC5 and for surface water disposal in accord with policy ORC6. These arrangements are to be demonstrated in foul and surface water management strategies which must be submitted with the planning application concerned.". Add new criterion to policy ORC5: "demonstration of nutrient neutrality in accord with policy ORC1.". Add to policy ORC8 second para.: "The development must be shown to be nutrient neutral in accord with policy ORC1. Proposals should incorporate a wastewater management strategy in accord with policy ORC5, and a surface water management strategy in accord with policy ORC6.".

Part 2: Community and other comments

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Resident 1	Policy ORC5	C	More a request for information than a comment. Referencing the Appropriate Assessment, which I confess to reading inconsistencies and contradictions, there is one area I'd like to ask for clarification. It's this part: *7.17 These are:* *• Drainage fields is more that 50m from the designated site boundary and;* *• Drainage field is more than 50m from any surface water feature (ditch, drain, watercourse and;* *• Drainage field is in an area with a slope no greater than 15% and;* *• Drainage field is in an area where the high water table groundwater depth is at least 2m below the surface at all times and;* *• There are no other hydrological pathways which would expedite the transport of phosphorous (fissured geology, shallow soil, flooding)* The question is would the NDP include this in OCR5? If that is the plan, then would the consequence be almost nothing could be built in the parish? as the 50m rule 1 and 2 would be nigh on impossible to meet. Or am I reading this all wrong?	These five criteria are an interim approach being taken to planning applications in the Lugg catchment whereby they can demonstrate nutrient neutrality by establishing there is no pathway for impacts on the SAC. The AA recommends that NDP policies include additional provisions for water quality and foul and surface water management (see response to comment by Natural England). The AA does not suggest that the criteria be included in the NDP. Advice to developers on how to achieve nutrient-neutral development is evolving and over-prescription can lead to a policy quickly becoming out-of-date.	No change.
Resident 2	NDP	C	I think there would be a lot more involvement from the locals if somewhere there was a summary of what we would be voting for exactly, i.e. a vision for the future of the village. The report does not clearly set this out in simple English.	This comment is noted. It is suggested that at the time of the referendum on the NDP, consideration be given to circulation of a short summary leaflet to boost turnout.	No change.
Resident 3	Policy ORC8 Plan 6	S	It is obvious from the boundaries at Orcop Hill that there is no capacity for more dwellings.	This support for the NDP is welcomed	No change.
	Policy ORC8 Plan 7	S	Also the boundary at Orcop shows no land other than farmland. This would alter the farming landscape if dwellings were placed there.	This support for the NDP is welcomed	No change.
	NDP	S	I am grateful for all the time and energy that has gone into producing the NDP.	This support for the NDP is welcomed	No change.
Resident 4	NDP	C	NDP reads well and seems researched, balanced and fair. Thanks go to everyone involved in this achievement. Some comments if I may... which may be out of scope for NDP of course...	This support for the NDP is welcomed. The points raised re pedestrians, footpaths, public car parks, cycle security, passing places and HGV usage are largely outside	Add to end of policy ORC4 criterion 7: "Proposals for green infrastructure will be expected to be designed in accordance with

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			1. Pedestrians - Walking for locals and tourists can be hazardous and scary on the roads. Has any improvement been considered? I'm guessing nothing can be done however. 2. Footpaths - Signage and ease of access are not great. Not sure this is in scope of NDP but be good to know what has been done and is planned to be done. I notice it in the 'Community Actions' section but only in terms of 'will continue to work' and I'm not sure that level of focus has maintained levels. 3. Parking - I believe there are no public car parks in the parish so difficult for tourists to know where to park without causing a nuisance. Has consideration been given to identifying (and signing) preferred parking areas? I frequent Garway Hill and know how difficult it is and frustrating for locals living near the red telephone box for example. People visiting the church end up being unclear where to park. I guess walkers can park in Parish Hall of course? 4. Cycle security - I cycle occasionally (electric) but there is often nothing to secure my bike to to then take a walk. How could I best influence to encourage secure cycle points? 5. I notice the word 'encouraged' before reference to 'Building with Nature standards'. Seems a bit vague. Could this be sharpened up? 6. Passing places - Do PC and Highways review these...? Frequency? There seems to be a little too few and a little shallow when passing lorries and tractors (these agri machines are growing it seems!). 7. Lorries - it seems there are more large lorries these days... too large for these narrow lanes. No restrictions can be applied I guess? 8. Wood sales - Near Baggy there are woods for sale. Does or should the NDP have a view on this? Is there protection from sale for some/any woods. These are wildlife habitats and human intrusion will be detrimental. Keep up the good work.	the scope of the NDP, falling mainly instead to the highway authority and landowners. They have been reflected as requirements for development proposals in policies such as ORC4 and ORC11 as far as practicable, and further policy reference is to be made following comment by HC Transportation. They are also addressed in Community Actions. With reference to the Building with Nature standards, these represent best practice and are increasingly being reflected in planning policy. To that end compliance with the Standards should be included in policy ORC4 and the present reference in the supporting text at para. 4.15 strengthened. The sale of woodland is not a matter for the NDP. However, policy ORC1 gives protection to habitats such ancient and semi-natural woodland and ancient replanted woodland.	the Building for Nature standards.”. Amend para. 4.15 to read: “…developers should follow the Building with Nature standards ...”.
Resident 5	Policy ORC4 criterion 5	C	Include: impact on privacy amenity – after ‘…, dust or odour;’.	Agreed.	Amend policy ORC4 criterion 5 to read: “…, light, dust, odour or loss of privacy; and “.
	Para. 4.19	C	Include: which provides a link to ‘general binding rules on the DEFRA website – after ‘…the Council’s SuDS Handbook.’.	Agreed.	Amend penultimate sentence para. 4.19 to read: “Proposals should be drawn up in accordance with the checklist and the Council’s SuDS Handbook, which requires

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					compliance with and provides a link to the General Binding Rules on the DEFRA website.”.
Residents 6 and 7	NDP	S	As residents of Orcop we have read and approve the NDP as drafted.	This support for the NDP is welcomed.	No change.
Pendleton and Associates Ltd	NDP	O	1. This submission is made on behalf a local resident who has significant land holdings inOrcop Hill. 2. Government Guidance says: “*Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and shape the development and growth of their local area. They are able to choose where they want new homes, shops and offices to be built, have their say on what those new buildings should look like and what infrastructure should be provided, and grant planning permission for the new buildings they want to see go ahead. Neighbourhood planning provides a powerful set of tools for local people to plan for the types of development to meet their community’s needs and where the ambition of the neighbourhood is aligned with the strategic needs and priorities of the wider local area*” (Government Guidance Paragraph: 001 Reference ID: 41-001- 20190509). 3. The Draft NDP simply fails to the address these three elements: a) Development and Growth of Orcop and Orcop Hill b) What Infrastructure needs to be provided c) Community Needs 4. For more than twenty years, there has been discussion on upgrading the waste treatment plant. The NDP should suggest ways in which the Sewer Treatment plant can be upgraded and how new sewers can be provided to enable the land to be more suitable for development. The NDP should actively encourage an enabling development to achieve these goals. This development and the CIL would then be used to fund further infrastructure improvements into the future. 5. The Plan identifies the quantum of housing required to meet community needs, but then argues why this cannot be achieved – this approach is not within the spirit of Government Guidance, namely proactive vision for development and growth. 6. Our client’s land is located immediately adjacent to the waste sewage plant and on the edge boundary of the settlement boundary to Orcop Hill. The site currently adjoins the settlement boundary line and comprises a residential farmhouse building with adjoining agricultural fields.	This comment proposes two sites for consideration for allocation for development. The site to the north has previously been considered and discounted through the site assessment process as being poorly-related to the settlement (site 16). This position is unchanged. The site to the south is a new proposal. A site assessment conducted using the Locality template has shown that the site does not have vehicular access to adopted highway. Access is proposed by connection to the existing private access road to Copywell Cottages to the east. However, the site does not abut this access, with intervening third party land which is part of the garden to 6 Copywell Cottages. In addition, the availability and capacity of the private access road and suitability of its junction with Lyston Lane to accept additional traffic is unknown. The site has a medium sensitivity for landscape and visual amenity and would extend the built form of Orcop Hill in an intrusive, linear fashion into open countryside. The site is	No change.

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			7. The Neighbourhood Plan paragraph 5.4 states *"The NDP has based its approach to housing delivery on the growth target set out above. This is equivalent to at least 26 dwellings being provided in the Neighbourhood Area between 2011 and 2031"*. Paragraph 5.2 states *"Local Plan Core Strategy policy RA2 Housing in settlements outside Hereford and the market towns further designates Orcop Hill as a "main focus" settlement for proportionate housing growth, and Orcop as an "other settlement" where proportionate housing is appropriate. In the countryside outside these settlements, housing development is restricted as set out in policy RA3 Herefordshire's countryside, to avoid an unsustainable pattern of development (this includes the outlying hamlets such as Little Hill, Garway Hill and Bagwyllydiart".* 8. Orcop Hill is identified as a main focus for settlement for proportionate housing growth. The Neighbourhood Plan states 5 of the 26 home targets have actually been constructed and accordingly there is a significant shortfall in housing delivery for the plan period. Paragraph 5.14 states "*in the questionnaire survey undertaken for the NDP, smaller family homes of 2 or 3 bedrooms were the most preferred, followed by smaller affordable/starter dwellings (1 or 2 bedroom"*. This provides clear evidence of a need for small affordable homes for local people and Orcop Hill is identified as a potential area for housing growth. 9. Paragraph 4.17 states "*there is no foul sewerage treatment to the area*". The challenges of providing environmentally acceptable waste treatment constrains much of the development at Orcop Hill. Whilst the Neighbourhood Plan allocates a few sites for development, waste treatment is a big factor preventing these sites actually being constructed. 10. There is a need to protect the integrity of the River Wye Special Area of Conservation (SAC), concerning water quality and nutrient levels relating to supporting river habitats. The SAC currently suffers from the effects of point source or diffuse water pollution, from elevated phosphate levels in particular. This is a fundamental issue which prevents cess pools or sceptic tanks being used to provide foul water treatment to new developments. The way to resolve this issue is to provide a dedicated foul water sewer connecting Orcop Hill to the upgraded waste treatment plan. 11. Extant planning consents (such as Birch View) cannot proceed unless an adequate sewage system to Orcop Hill is provided. This is best done by upgrading the existing sewage station and laying new sewers to the top of Orcop Hill. 12. Our client wishes to provide a provide a small sustainable number of homes at Orcop Hill, to be offered to local people and to provide the much-	proposed to be connected to the DCWW wastewater treatment works to the south west (site 16 is also proposed to be served in this manner). DCWW's reg 14 response states the plant is unlikely to have capacity to serve further development, so the feasibility of this arrangement is in doubt. Having regard to these constraints, the site is not considered to be developable and is not progressed further in the NDP. It is further suggested that the proposed developments would fund connecting some existing but unspecified village properties to the DCWW treatment works, as well as the sites themselves. DCWW say the works are unlikely to have the capacity to serve further development. The proposal refers to the plant being "upgraded" but it is not clear how this would be funded or whether it is feasible on the current works site. In the absence of such an upgrade it is unlikely to be practicable to connect additional existing properties. In any event, it is not clear how any NDP policy requiring such connections to benefit the community could be secured. The use of planning conditions and obligations is limited to making otherwise unacceptable development	

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			needed sewerage link from the existing sewage plant and station. The new sewers would be laid in existing fields and provide a great public benefit to the village of Orcop Hill, without disrupting the existing roadway infrastructure and daily village life. A new sewerage link to the Waste Treatment Plant would be expensive and would require to be paid by an enabling development or the public purse. We would argue that a small number of homes for local people, could pay for the extension to the sewerage system even if this means development is allowed outside the settlement area or indeed through linear development adjoining the settlement. 13. A submission was made to a site allocation document in 2018 to have enclosed site allocated for residential use, but due to an oversight, our submission was not processed by the NDP steering group at the time. It was, however considered later in March 2020 and the steering group have considered this site to be '*Amber- suitable, available and achievable'* for housing development (see attached). This site should be referenced in the Neighbourhood Plan in this latest document out for consultation. 14. This letter therefore seeks for the Neighbourhood Plan to recognise in principle our site is 'suitable, available and achievable', as assessed through the site allocations process. The owner of the site wishes to deliver a legacy development for the benefit of all of Orcop Hill. This would ensure the deliverability of the Council's housing targets proposed in the Neighbourhood Plan and would enable Orcop Hill to move away from polluting sceptic tanks and cess pools. 15. The NPPF Chapter 5 concerns 'delivering a sufficient supply of homes'. Paragraph 60 states that to support the Government's objectives of significantly boosting the housing supply, it is important that a sufficient amount of land can come forward where it is needed. Paragraph 69 states that local planning authorities are required to support the development of windfall sites. Policy ORC9 of the Neighbourhood Plan states that "*Housing proposals in the Neighbourhood Plan Area should be able to demonstrate that they are of a type and size that positively contribute to meeting the latest assessment of housing needs, particularly for small properties. Development proposals which provide housing of a suitable size, tenure and style to meet local needs will be supported"*. Our client's proposal would provide the much needed land required in the identified preferred location of Orcop Hill. It could provide much needed affordable housing for local people at a mix preferred.	acceptable, rather than with ameliorating an existing situation. Whilst the proposal refers to the Community Infrastructure Levy, there is no such Levy operating in Herefordshire.	

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			16. Paragraph 5.5 of the Neighbourhood Plan states; *"all of the dwellings which have been built or granted planning permission since 2011 comprise windfalls"*. Therefore, we politely request that my client's site be recognised and included in the Neighbourhood Development Plan. This could be subject to an agreed maximum figure of approximately 10-15 affordable homes, in an appropriate mix, conditionally on the provision of an underground sewerage treatment link to existing substation. This would provide a sustainable means of providing a small amount of genuine local affordable housing and could be the single 'windfall site' the Council needs to meet its targets. Any planning application would of course be subject to the development proposal meeting all the relevant policies on environmental, ecological, sustainability and design. Any homes would need to be meticulously designed by a heritage team to preserve the character of the village, and any sewerage pipes would be designed by the relevant ecology and sustainability teams to ensure it causes no impact upon the environment with its underground pipe connections. 17. A site plan of the proposal is provided as an approximate outline at this stage. It is just outside of the settlement boundary and was recognised by the steering group in March 2020 as a viable amber residential development site. Therefore, we propose that our site is acknowledged as either part of the settlement boundary with potential for limited local housing development, or simply as a windfall site allocation with the potential to provide 10-15 affordable homes for local residents on an existing residential site, with existing utilities and providing the important sewage link that Orcop Hill needs. 18. Paragraph 8.29 states *"The suitable and available capacity of land for new housing at the two identified settlements, Orcop Hill and Orcop has been thoroughly investigated"*. This site needs to be investigated further for a unique opportunity to meet the Council's affordable housing needs for future generations. There is sufficient land available for meeting the Council's targets and this proposal ensures this land can come forward to provide much needed affordable housing to the Orcop Hill. It provides an opportunity to upgrade the sewage system at Orcop Hill providing great public benefit. The inclusion of my client's land at Orcop Hill to provide up to 10-15 affordable homes would address community needs and would preserve and enhance the character of Orcop to ensure future generations can enjoy living and working in a peaceful rural setting. 19. We hope to take a proactive role involvement alongside our neighbours in Orcop to address the community needs and provide an enabling sustainable		

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			development. We hope the Council can help plan for the sustainable growth of Orcop and Orcop Hill and plan the necessary infrastructure it requires. 20. We would be grateful of confirmation of receipt of this submission given our previous submission to the Site Allocations Document was overlooked by the Steering Group. 		
Resident 8	Housing delivery report, Site 13 Little Ynys	O	The bulk of site 13 is to the north west side of the Copywell Brook and lies between the brook and the bottom of steep arable fields. During heavy rainfall there is normally large volumes of water originating from the top of Orcop Hill which passes down the fields and across site 13. There is frequent subsidence around the sides of the brook. This makes the site wholly unsuitable for residential dwellings. There have been problems with this at Sunset Cottage ever since the brook was piped. The access to site 13 is also hazardous due to the narrow land and lack of vision when pulling out. The Copywell Brook is an important local wildlife habitat in which newts can be found. I favour the nucleated approach as it will have less impact on appearance and character of this rural community.	This comment is included here for completeness although it does not relate to the draft NDP but to the Housing Delivery Report, part of the supporting evidence base. Site 13 was assessed in that report where it was included in one of the delivery options. That option was subsequently discounted and site 13 was and is not being taken forward in the NDP.	No change.
Resident 9	NDP chapter 6 Rural economy	C	Develop visitor attractions e.g. museum/gallery.	Rural tourism proposals are catered for by policy ORC11 which includes craft and leisure proposals particularly those which seek to sustain, enhance and promote a	No change.

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				better understanding of the local natural, historic and cultural environment (para. 6.5). There are no specific proposals for the development of tourism attractions, to be implemented either by the Parish Council or others in the plan period, for inclusion in the NDP.	
	Vision	C	Suggestion for a "learning centre". See "65 High, Street, Nailsea" and similar such sites.	65 High Street Nailsea is operated as a 'digital community hub' by the Town Council, who purchased the building for this purpose. It is an informal drop-in venue for anyone wanting advice, support and friendship, and a base for local groups and services. An equivalent local provision with an emphasis on learning, as suggested, could already be established at the Parish Hall; a Community Action is proposed to this end. If a different venue was required (or the Parish Hall need extending), policy ORC10 would apply to any development proposals including change of use. At this stage, there are no specific proposals, to be implemented either by the Parish Council or others in the plan period, for inclusion in the NDP.	Add new Community Action to Table 3: "CA8 Community hub. The Parish Council will investigate the feasibility of establishing a community hub at the Parish Hall or other venue, to provide a drop-in resource and act as a base for local groups and services.".
		C	Good to be able to see that Orcop may have a viable future – the Vision needs attention!!	The Vision has been created by the Steering Group based in the feedback from the questionnaire survey. It is not clear what changes are sought; there is already reference to accommodating development which addresses	No change.

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				community needs and this would appear to cover the other points raised by this consultee.	
Resident 10	Vision and objectives	C	The NDP is a comprehensive document and as a good starting point for feedback, I'd like to quote the referenced Herefordshire Ecological Network Map section 2.3 *A healthy natural environment is important for our well-being, health and economy.* My thoughts and feedback focus mainly on connecting the community of Orcop residents, its visitors and its natural biodiversity. It was heartening to meet, reconnect and have the opportunity to chat with fellow residents on the road as we take our 'Covid Exercise' walks over the past two years. With this in mind, it would be good to see a little more of the general character of village life reflected in the detail of the plan if possible. I would also like to see included in section 3 of the plan, a need for more provision for public recreation facilities for young people in the village, particularly safe spaces away from vehicles where more inter-generational contact can be made with the local population. Some thoughts and comments on how this could be achieved: I live in Copywell Cottages, Orcop Hill and am keen to see the area around the Copywell head, adjacent to the Fountain Inn develop into an area with more public engagement. The green area, notice board, phone box library and bus shelter provide an ideal opportunity for a compact 'Village Green' space with recreational facilities. I'd like to highlight its potential within the NDP as a focal point for bringing the community closer together. Although Covid has temporarily halted our efforts to develop this space, we can resume the project as a practical example for the NDP showcasing how a community can grow, connect and provide a nurturing environment for its residents and visitors. Orcop as a location is a diverse village without a traditional centre, as such. Connecting the Copy Well space with other similar 'Village Green' spaces located further south, perhaps alongside the Village Hall and/or St John the Baptist Church, could provide a sense of continuity to the area. This is a suggestion for creating much needed points of contact that would serve as cultural information hubs, informal meeting and outdoor public exhibition places that celebrate the village's heritage, community and natural ecological beauty. The NDP covers the natural infrastructure of the area in detail. I would like to see reflected within the Vision and Objectives more of a focus on the health	The community development activities proposed here and which flow from the heritage and the natural environment of the Neighbourhood Area are largely outside the formal scope of the NDP. However, they could appropriately be referenced as a Community Action, as a springboard for future initiatives. In respect of land at Copywell, this small site forms a natural focus in Orcop Hill and 85% of respondents to the questionnaire survey thought it was worthy of protection. Together with this comment, there are grounds for it to be designated in the NDP as Local Green Space (LGS). Amongst other requirements, such land must be in close proximity to the community served, be demonstrably special to a local community and hold a particular local significance, and be local in character and not an extensive tract of land. The land meets these requirements. Landowners must be contacted at an early stage about proposals to designate any part of their land as Local Green Space. Policy ORC10 on community facilities refers to provision of a	Add new Community Action to Table 3: "CA9 Community development The Parish Council will support new forms of community development and connections based on the heritage and natural environment of the Neighbourhood Area.". Add new policy ORC11 on Copywell Local Green Space: "Land at Copywell, Orcop Hill shown on Plan 6 is designated as Local Green Space and will be safeguarded from inappropriate development unless very special circumstances arise which outweigh the need for protection.". Associated explanatory text. Show the LGS on Plan 6 as shown below:

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			and well-being benefits for people who live here, particularly as over 70% of people responded to the questionnaire valuing the biodiversity of location and landscape. There is also an opportunity here to highlight and reference more the climate and biodiversity emergency as we plan for a zero carbon future. Orcop has a willing and able population who can make positive changes as well as being the beneficiaries of good development. I ask, can we find a way of articulating this in the plan?	children's play area and other recreational facilities, which could be more specifically referred to within the relevant objective. Similarly, the objectives could also refer further to securing the community's health and well-being, and to planning for climate change and a low carbon future.	 NORTH © Crown copyright and database rights (2020) Ordnance Survey (0100059189). Not to scale. In the objectives, refer to community health and well-being, recreational facilities, climate change, and the transition to a low carbon future.
Residents 11 and 12	Para. 4.2	C	Who wrote this – have they ever visited? High hills and slopes – absence of human habitation – most of us live in such areas. Principal Wooded Hills – the majority of the neighbourhood area – just a glance at the map would disprove this.	Para. 4.2 summarises the County Landscape Character Assessment as it applies to the Neighbourhood Area.	No change.
	Para. 4.7 (policy ORC2)	O	I'm sure everyone has their preferred views. Giving precedence to the views preferred by the steering group seems inappropriate.	Policy ORC2 identifies key views informed by responses to the questionnaire survey (Q15).	No change.
	Paras. 4.17 – 4.21 (policy ORC5)		The approach seems comprehensive but in every case it seems package systems have led to pollution. We need an approach with proven success – not one of proven failure.	Package treatment plants are an established method for wastewater treatment recognised in national guidance and the LPCS. National policy is that planning policies should focus on whether proposed development is an acceptable use of land rather than the control of processes or emissions subject to separate pollution control regimes (NPPF para. 188).	No change.