Orcop Neighbourhood Development Plan 2021-2031

Referendum version

St John the Baptist church looking towards Orcop Hill

DJN Planning Limited · November 2022 · For Orcop Parish Council

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Note on place names:

Unless otherwise indicated by the context:
Orcop Neighbourhood Area or **Neighbourhood Area** refers to the whole parish of Orcop (see Plan 1)
Orcop Hill is the settlement in the north-east of the Neighbourhood Area
Orcop is the smaller settlement in the south-east of the Neighbourhood Area.

1. SETTING THE SCENE

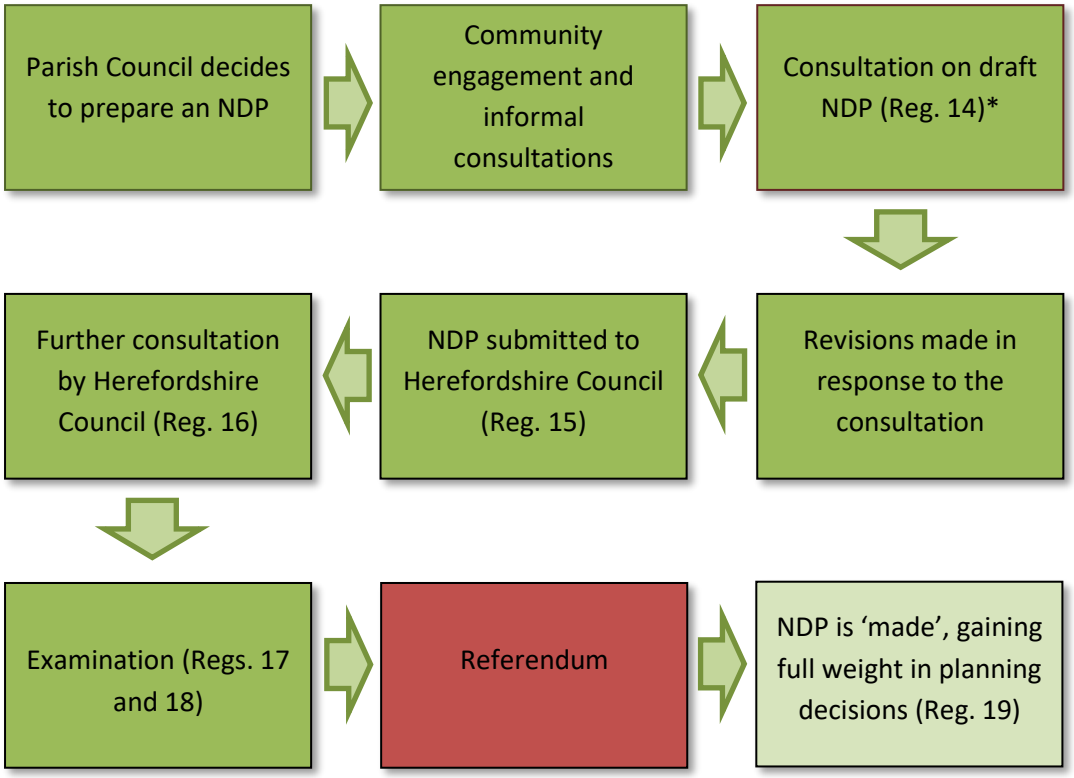
Introduction

1.1 The Localism Act 2011 gave local communities the ability to prepare Neighbourhood Development Plans as part of the statutory planning framework governing the development and use of land in the area. When planning applications are made, they must be decided in accordance with this framework unless there are overriding circumstances to the contrary.

Preparing the Neighbourhood Development Plan

1.2 Orcop Parish Council has decided to prepare a Neighbourhood Development Plan (NDP) to help ensure that decisions on future development are guided locally.

1.3 This document is the referendum version of the NDP. It has been prepared by a Steering Group of Parish Councillors and other volunteers and has been subject to two rounds of consultation and an independent Examination, in accord with the procedures laid down by Government shown below.



Neighbourhood Development Plan preparation process

* references to regulations are to the Neighbourhood Planning (General) Regulations 2012.

1.4 The NDP must be based on evidence about the characteristics of the parish, which has been compiled by the Steering Group from a range of sources. Much information has been taken from reports and other documentation prepared by Herefordshire Council for the Local Plan Core Strategy. This has been supplemented by local sources, including a comprehensive questionnaire survey undertaken in 2020 and professional surveys and site assessments. The resultant 'evidence base' for the NDP is set out at Appendix A.

Format of the Neighbourhood Development Plan

1.5 The NDP begins by giving a thumbnail sketch of the main features of the Neighbourhood Area (chapter 2).

1.6 A Vision for the Neighbourhood Area in 2031 is set out in chapter 3, together with more detailed objectives. In line with national and County-wide planning policies, the NDP seeks to contribute to sustainable development by addressing social, environmental and economic matters together.

1.7 The NDP then sets out policies on the development and use of land, on the environment (chapter 4); housing and community (chapter 5); and the rural economy (chapter 6). A concluding chapter explains how the NDP will be delivered and sets out Community Actions to capture aspirations on non-land use matters.

National and local planning policy context

1.8 The NDP's policies need to be read alongside the existing national and County planning policies which apply in the Neighbourhood Area.

1.9 National planning policy is set out in the National Planning Policy Framework. Planning Practice Guidance gives more detailed advice as to how national policy is to be implemented.

1.10 Herefordshire Council is responsible for preparing the Local Plan. The Local Plan Core Strategy sets out strategic planning policies for the development of the County from 2011 to 2031. It designates Orcop Hill as the main focus for new housing development in the Neighbourhood Area, with Orcop as a secondary settlement. It also deals with issues such as requirements for new housing, the rural economy, the environment and community facilities. The NDP has been written to complement these existing policies taking into account relevant parish considerations and context.

1.11 The Local Plan Core Strategy was adopted in October 2015. Herefordshire Council has recently undertaken a review of the Local Plan Core Strategy and decided that it needs updating. The process is at an early stage. For the purposes of the NDP and the assessment of general conformity, the relevant strategic policies contained in the adopted development plan for the area are those in the adopted Local Plan Core Strategy. Where reference is made in the NDP to strategic policies, this should be taken to include any successor policies arising from the update.

1.12 The NDP, like all development plans, is subject to an assessment process known as 'Strategic Environmental Assessment'. It must also undergo an 'Appropriate Assessment' under the Habitats Regulations because of the proximity of the River Wye Special Area of Conservation. These Assessments are undertaken independently by Herefordshire Council. To this end, Assessments of the NDP at the earlier draft and submission stages have been carried out.

1.13 The NDP covers the period 2021 to 2031, and the qualifying body is Orcop Parish Council.

At the crossroads

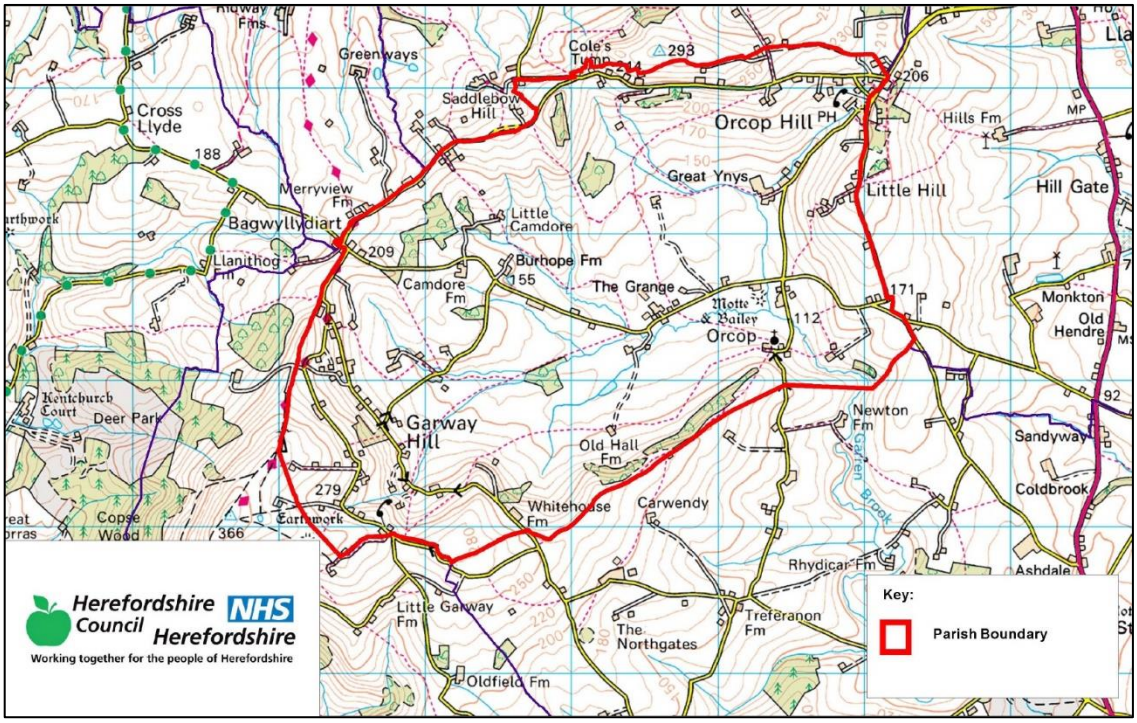
2. ORCOP NEIGHBOURHOOD AREA

2.1 Orcop Neighbourhood Area was designated in July 2013. It covers the parish of Orcop, an area of 1,005 hectares in the south-west of Herefordshire, with a notably dispersed pattern of settlement (Plan 1). This chapter describes the Neighbourhood Area in terms of the environmental, social and economic aspects which contribute to sustainability and to a distinctive and rural sense of place.

Environment

2.2 The borders of the Neighbourhood Area run along higher ground enclosing a broad valley, creating a natural bowl with steeply sloping hillsides and a secluded and remote character. The County Landscape Character Assessment identifies three components to the landscape in the Neighbourhood Area:

- High Hills and Slopes, being the elevated land in the north and west, such as Garway Hill and Saddlebow Hill;
- Principal Wooded Hills, in the centre; and
- Wooded Hills and Farmlands, to the south and east of Orcop Hill and Orcop respectively.



Plan 1: Orcop Neighbourhood Area

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2.3 In terms of biodiversity, there are a number of habitats which are designated at County level as Local Wildlife Sites. These are at Orcop Church; Old Hall and Little Old Hall Woods; Hondy Wood, and the Garren Brook. Outside but adjoining the Neighbourhood Area, there are Local Wildlife Sites on common land at Garway Hill, Saddlebow, and Merryvale, and at Burnt House Wood. There are also Habitats of Principal Importance, comprising ancient and semi-natural (Cockshoot Wood, Stradway Wood, Hondy Wood) and ancient replanted (Old Hall Wood) woodlands, the Garren Brook, and traditional orchards.[1] Herefordshire Council's Ecological Network Map shows how the various habitats act as core areas and buffer zones, being associated with woodland and particularly the corridor of the Garren Brook.

2.4 The Neighbourhood Area drains via the Garren Brook south-eastwards to the River Wye, which is a Site of Special Scientific Interest and a European-level Special Area of Conservation. A notable issue in the Wye catchment is excessive concentrations of phosphates affecting water quality. Land in the corridor of the Garren Brook is liable to flood (Flood Zone 3 downstream from east of Mill Wood). The Garren Brook is in turn fed by several tributary watercourses flowing from the surrounding higher ground; there are also several springs and the area has generally poor drainage conditions.

2.5 The Neighbourhood Area has a number of designated heritage assets. There are two scheduled ancient monuments, Orcop Castle and a churchyard cross in St John the Baptist churchyard at Orcop. The Church itself is listed Grade II*, as is a barn west of Old Hall Farmhouse. The other listed buildings and structures (all Grade II) are the base of the churchyard cross and the War Memorial. There are no Conservation Areas or registered or unregistered parks and gardens in the Neighbourhood Area.

Community

2.6 The primary designated settlement is Orcop Hill in the north-east of the Neighbourhood Area. It is grouped around a road junction which also marks the point where Orcop parish meets Much Dewchurch and Llanwarne parishes. Some settlement housing extends into these adjoining parishes. Orcop is a smaller settlement in the south-east, formed by a handful of properties clustered around the church of St John the Baptist.

2.7 Settlements elsewhere in the Neighbourhood Area such as at Garway Hill, Bagwyllydiart, Saddlebow Hill, Cole's Tump and Little Hill are markedly individualistic and dispersed, comprising farmsteads, hamlets and other wayside development set amongst pasture, arable farmland, orchards and woodland.

2.8 Orcop Hill has a public house (The Fountain Inn) and Baptist Chapel. The Parish Hall was built in 1993 and is located at a central point along the bottom valley road, albeit it is not well-related to any area of settlement. There is a Methodist Chapel at Garway Hill in the west. Residents also make use of facilities in neighbouring parishes including primary schools at St

[1] As listed in the Priority Habitat Inventory which is maintained by Natural England pursuant to section 41 of the Natural Environment and Rural Communities Act 2006.

Weonards, Garway and Much Birch, the Steiner-Waldorf Academy at Much Dewchurch (age 3-16), local shops at Wormelow and St Weonards, and a GP surgery at Much Birch. Ewyas Harold to the west has a GP surgery, dentist, Post Office, shop, fish and chip shop, two pubs, community hall, badminton group, football and cricket teams. The Neighbourhood Area is set equidistant from Hereford, Ross-on-Wye and Monmouth, and looks to all three for the provision of higher-level services such as secondary education, employment and shopping.

2.9 Access to such services and facilities is entirely by single-track roads out of the Neighbourhood Area. To the east, Orcop Hill is 1.7 km from the A466 along Lyston Lane, connecting then to Monmouth (via St Weonards) and Hereford (via the A49). To the west it is 4.8 km from Bagwyllydiart to the A465 at Pontrilas and Ewyas Harold, with access then to Abergavenny and Hereford.

2.10 The 412/413 bus route skirts the northern edge of the Neighbourhood Area along the C1235 and serves Orcop Hill. The 412 provides a peak-time connection on school days only between Hereford, Broad Oak and Wormelow. The 413 service offers one daytime return service from Broad Oak into Hereford on Monday, Wednesday and Friday, arriving in Hereford at 1026 and departing at 1330. Orcop settlement has no bus service. Overall, the sustainable transport options that are practicably available to residents are extremely limited. This means an effective reliance on the use of private transport for most journeys, such as to access health services, employment, education and shopping.

2.11 The Neighbourhood Area is crossed by numerous public rights of way giving access for local use and tourists. This includes a section of the Herefordshire Trail, a long-distance footpath which runs to the west.

2.12 The population of the Neighbourhood Area was 417 in 2011. Whilst this is similar to the 2001 figure (419), the 2019 estimated population is 441, a projected increase of 6%. In 2011, the age profile of the population was slightly older than the County average. Whilst young people aged 0-15 made up 18% of the population (similar to the County figure, 17%), older people aged 65 and over accounted for 24% (County 21%). By 2019, some 27% of the population is estimated to be aged 65 and over (County 25%). The population density in 2011 was 0.4 persons per hectare, half that of the County (0.8 pph).

2.13 There were 173 households in 2011, giving an average household size of 2.4 persons per household. In 2011 83% of homes were owner occupied, either outright or with a mortgage or loan, more than the County average (68%). Over half (53%) of households owned their properties outright, significantly higher than for the Herefordshire as a whole (39%). Conversely a much lower proportion of households lived in socially rented properties (1%) than in the County as a whole (14%). Some 81% of dwellings had three bedrooms or more, compared to 67% in Herefordshire. Under-occupancy was a notable feature, with over four-fifths of households having more rooms and bedrooms than required.

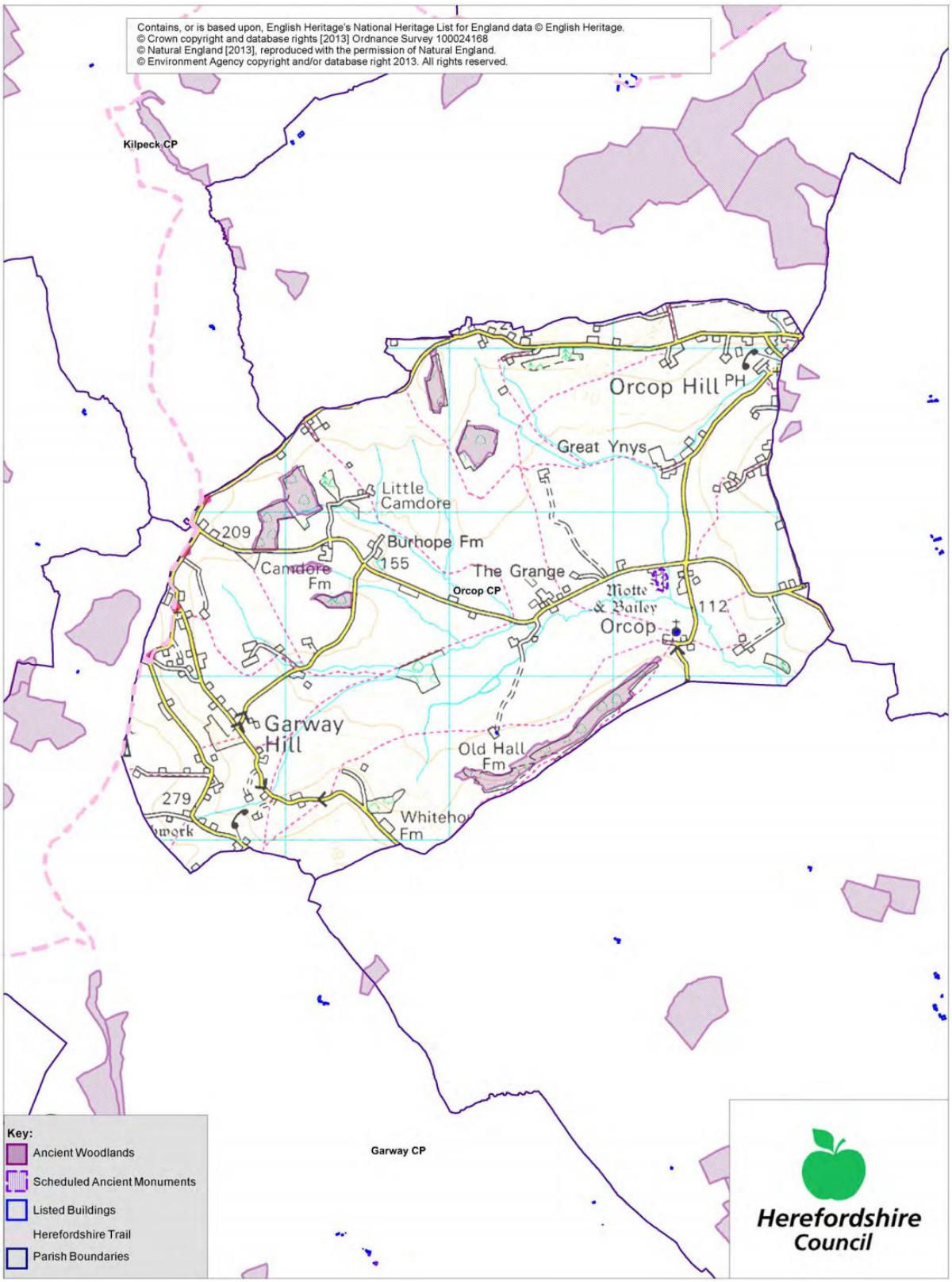
Economy

2.14 Levels of economic activity of Neighbourhood Area residents in 2011 were slightly lower at 68% than in Herefordshire (70%), whilst the rates for self-employment (28%) and retired (21%) were higher than at County level (14% and 17% respectively). For those in employment, there was a greater focus on managerial and skilled trade occupations than seen at County level. Some 13% of working residents worked at or mainly from home, notably more than for Herefordshire as a whole (6%). For those travelling to work, this was typically by driving a car or van, reflecting the rural surroundings and the limited availability of public transport. As a result, car ownership rates were relatively high with 64% of households having 2 or more cars or vans (County 41%).

2.15 The prevailing land use is mixed agriculture, with most of the farmland rated as grade 3 (good to moderate). Farms, local services and other small businesses including home-working provide employment. There are no industrial or trading estates.

2.16 Plans 2 and 3 are taken from the Strategic Environmental Assessment Scoping Report produced in respect of the NDP by Herefordshire Council. They show the many areas of heritage, landscape, minerals and biodiversity interest in the Neighbourhood Area.

Scarecrow at Bagwyllydiart



Plan 2: Orcop Strategic Environmental Assessment: Heritage and landscape.

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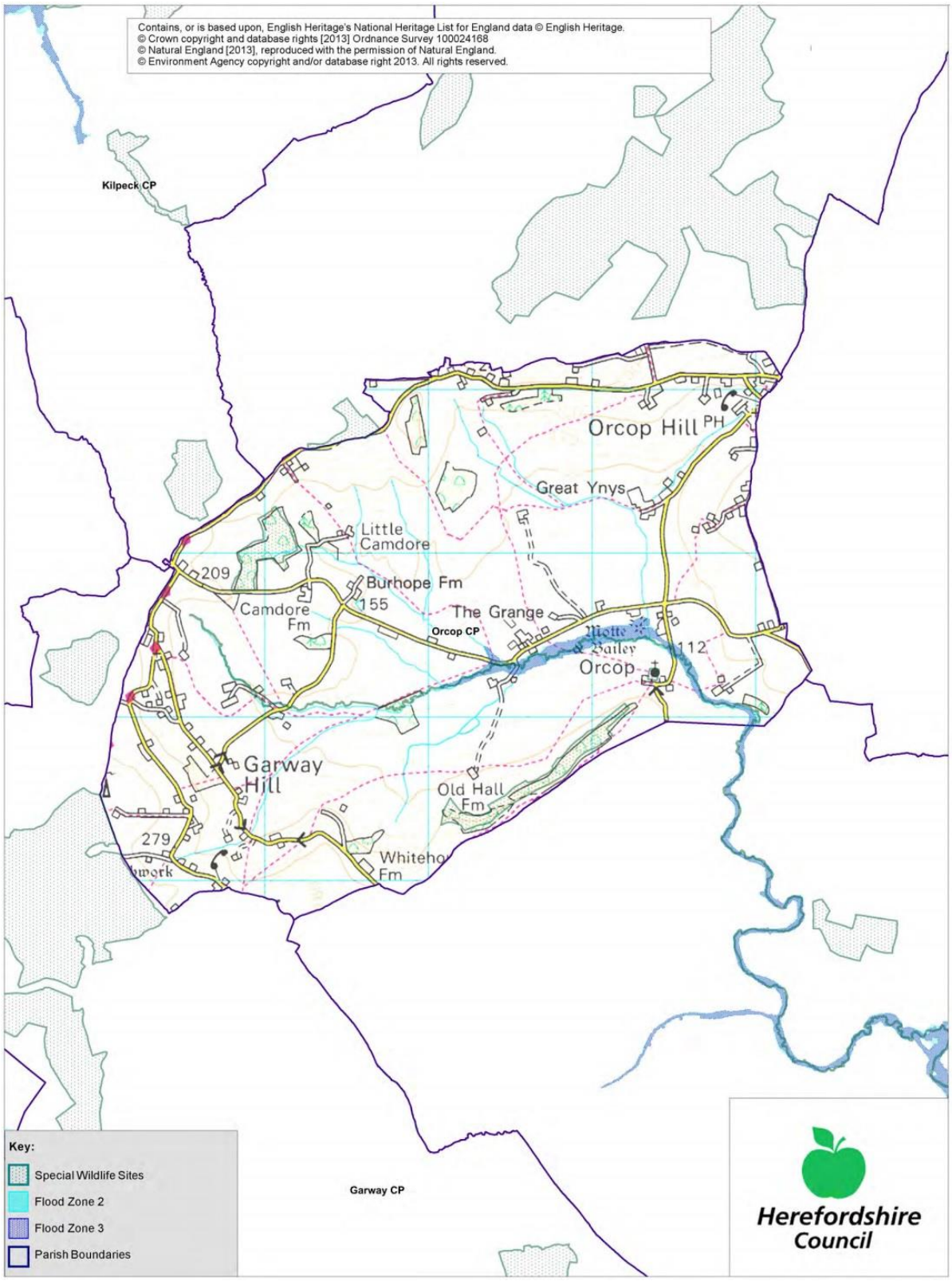

Plan 3: Orcop Strategic Environmental Assessment: Biodiversity and flood zones.

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3. VISION AND OBJECTIVES

Key issues

3.1 The following key issues have been identified in terms of how the NDP can best contribute to the achievement of sustainable development. They have been drawn from the environmental, social and economic aspects of the Neighbourhood Area as set out in chapter 2, and the results of the questionnaire survey.[2]

- The distinctive landscape character, evident in many panoramic and far-reaching views across the Neighbourhood Area from the higher land towards its boundaries, such as Garway Hill and Saddlebow Hill.
- A relative absence of modern development, with a traditional settlement pattern of an individualistic character, set in a working agricultural landscape.
- A focus of designated heritage assets at and around Orcop, including Orcop Castle.
- The limited provision and dispersed location of community facilities.
- The need to travel outside the Neighbourhood Area to access many day-to-day facilities and services such as convenience shopping and primary education, and further afield in the case of higher-order services such as health care, secondary education or employment.
- The limitations posed by the single-track rural highway network with limited passing places and road damage.
- A lack of existing or potential opportunities for sustainable travel (walking, cycling and public transport), having regard to the nature of the rural highway network, lack of footways and an absence of street lighting, the dispersed settlement pattern, the distances that need to be travelled to access facilities both inside and outside the Neighbourhood Area, and the limited provision of bus services.
- The capacity to accommodate new development, particularly at Orcop Hill in terms of providing acceptable wastewater treatment, with no mains drainage available and implications for local amenity and water quality in the Garren Brook and the River Wye from non-mains drainage options, and surface water treatment.
- As far as practicable, providing for the housing requirements of all sections of the population, bearing in mind the increasingly older demographic.
- Enabling continued opportunities for rural businesses including the provision of holiday accommodation which are consistent with the high environmental quality of the Neighbourhood Area.

[2] See Results Report and Comment Listings Report.

Vision

In 2031, Orcop Neighbourhood Area will be a place where people can enjoy living and working in a peaceful rural setting. The remote and deeply rural character of the parish will have been conserved and wherever possible enhanced, whilst accommodating new development which serves to address community needs and safeguard amenity.

Objectives

3.2 Objective 1: **landscape, biodiversity and heritage**

To conserve and enhance the distinctive natural and historic environment of the Neighbourhood Area, in particular its landscape character, key views, sites and features of biodiversity interest, and heritage assets, and recognising their role in sustaining community health and well-being.

3.3 Objective 2: **design**

To plan for climate change and a low carbon future, maintain and enhance the local distinctiveness of the Neighbourhood Area and achieve a high quality of sustainable design, with development supported by appropriate infrastructure including wastewater treatment, energy and water conservation and encouragement given to small-scale renewable and low carbon energy generation.

3.4 Objective 3: **housing**

To provide new housing to contribute to the strategic requirements of the Local Plan Core Strategy, with the scale of development determined by local evidence and environmental factors and with a range and choice to meet the needs of all sections of the community.

3.5 Objective 4: **community facilities**

To ensure that existing community facilities are retained and enhanced as much as possible, and to promote and enable appropriate new provision including recreational facilities.

3.6 Objective 5: **the rural economy**

To support and encourage the development or expansion of small and home-based businesses, agriculture and forestry which is compatible and in scale with the rural nature of the Neighbourhood Area.

4. ENVIRONMENT

Landscape and biodiversity

Policy ORC1 Landscape and biodiversity

Development proposals should conserve and where possible enhance the landscape and biodiversity by:

1. **demonstrating that they have respected the prevailing landscape character, as defined in the County Landscape Character Assessment; and**
2. **promoting the conservation, restoration and enhancement of all sites and features of landscape value and/or biodiversity interest in accordance with their status, including Habitats of Principal Importance, Local Wildlife Sites, irreplaceable habitats such as ancient woodland and veteran trees, hedgerows, ponds and watercourses, and historic field boundaries, with a view to securing net gains for biodiversity; and**
3. **not having an adverse effect on the River Wye Special Area of Conservation (SAC) and species of European importance. In particular, planning permission will only be granted if clear and convincing evidence is provided which shows that the proposed 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**
4. **maintaining, restoring and where possible enhancing the contribution of habitats to the coherence and connectivity of the Herefordshire Ecological Network, taking into account their role as green infrastructure.**

4.1 The Neighbourhood Area is a deeply rural landscape of largely ancient hedged fields and woodland, with an open and expansive character derived from the striking topography. Responses to the questionnaire survey show that the natural environment is locally valued; biodiversity, landscape, green spaces and ancient hedgerows and woodland were considered very important by a large majority (over 70%) of respondents. Preserving the dark skies and aquatic environments such as the Garren Brook were also seen as important.

4.2 The County Landscape Character Assessment[3] identifies three landscape types in the Neighbourhood Area whose character, as defined in the Assessment, should be respected by development proposals:

- **High Hills and Slopes** are characterised by a steeply sloping and prominent topography, with exposed, panoramic views and an absence of human habitation. The elevated land on the borders of the Neighbourhood Area, from Garway Hill and Saddlebow Hill to Orcop Hill and Little Hill, are of this type.
- **Principal Wooded Hills** offer a varied, often steeply sloping topography, with an ancient wooded character made up of mixed broadleaved woodlands with pasture and a scattered settlement pattern. The majority of the Neighbourhood Area is of this landscape type.
- **Wooded Hills and Farmlands** are medium to large scale upstanding, wooded landscapes with hedged fields set to mixed farming uses. The landscape to the south and east of Orcop Hill and Orcop respectively is typical of this type.

4.3 Natural features should be conserved, restored and enhanced wherever possible. Habitats of Principal Importance[4] comprise ancient and semi-natural woodland (Cockshoot Wood, Stradway Wood, Hondy Wood), ancient replanted woodland (Old Hall Wood), the Garren Brook, and traditional orchards. Orcop Church, the Garren Brook and Old Hall, Little Old Hall and Hondy Woods are also designated as Local Wildife Sites. Other landscape features such as trees, hedgerows, ponds and watercourses throughout the Area also have value to wildlife and form part of green infrastructure.

4.4 The Neighbourhood Area drains via the Garren Brook into the River Wye at Whitchurch to the south-east. The River Wye is a Special Area of Conservation and a Site of Special Scientific Interest. Water quality is a continuing issue in the Wye catchment and elsewhere. Local Plan Core Strategy policy SD4 *Wastewater treatment and river water quality* requires that development does not undermine the achievement of water quality targets for the County's rivers and also supports delivery of Water Framework Directive objectives, together with Local Plan Core Strategy policy SD3 *Sustainable water management and water resources*.

4.5 Development in the Neighbourhood Area has the potential to affect water quality in the River Wye which will need to be assessed through the planning process. The 'favourable condition' of the River Wye SAC is at risk of being adversely affected by the levels of nutrients in the river, particularly phosphate. Development which drains to the River Wye and which may increase nutrient inputs to the river can only proceed if it can be shown with certainty that there will be no adverse effect on the integrity of the site. Herefordshire Council has issued

[3] Herefordshire Council, Landscape Character Assessment, Supplementary Planning Guidance, 2004 updated 2009.
[4] As listed in the Priority Habitat Inventory which is maintained by Natural England pursuant to section 41 of the Natural Environment and Rural Communities Act 2006.

guidance for those seeking to demonstrate as part of their planning application that proposals are nutrient neutral:

- The Interim Phosphate Delivery Plan Stage 1 report provides guidance on calculating the phosphate budget for new development,[5] using a Phosphate Budget Calculator Tool.[6]
- The Interim Phosphate Delivery Plan Stage 2 report provides a range of potential mitigation options which may be used by developers to achieve nutrient neutrality for new housing developments.[7]
- Regular position statements are provided on Herefordshire Council's website to update applicants for planning permission on the requirements to demonstrate nutrient neutrality and the options available, the latest being issued in November 2021.[8]

4.6 Herefordshire Council's Ecological Network Map provides a detailed picture of wildlife habitats in the Neighbourhood Area, based on data held by the Herefordshire Biological Records Centre. It identifies the role that individual wildlife habitats play in the network and shows how they provide ecological connections within the more intensively managed areas of farmland and to neighbouring areas.[9] In the Neighbourhood Area, woodland and the Garren Brook represent core areas. Policy ORC1 ensures that the evidence base that the Ecological Map represents will be taken into account in planning decisions, including how connectivity can be safeguarded and enhanced.

4.7 The Local Plan Core Strategy includes policies to protect landscape and townscape (policy LD1), biodiversity and geodiversity (policy LD2) and green infrastructure (policy LD3). These policies, together with national policy and guidance, give an overall framework for environmental protection which is proportionate to the status and significance of the features involved. They are given local focus in the above policy. Complementary policy ORC4 on design provides for landscaping and wildlife in the context of individual development proposals, whilst policy ORC5 deals with wastewater treatment.

[5] https://www.herefordshire.gov.uk/downloads/file/22150/interim-phosphate-delivery-plan-stage-1-report
[6] Herefordshire_Council_Phosphate_Budget_Calculator_Final.xlsx (live.com)
[7] https://www.herefordshire.gov.uk/downloads/file/22153/interim-phosphate-delivery-plan-stage-2-report
[8] https://www.herefordshire.gov.uk/downloads/file/23131/nutrient-certainty-update-for-developers-30-november-2021

[9] https://www.herefordshire.gov.uk/downloads/download/77/ecological_network_map

Key views

Policy ORC2 Key views

To be supported, development proposals must demonstrate that they have been sited, designed and are of such a scale that they do not materially harm the following key views, as shown on Plan 4 and the accompanying photographs:

KV1: the view from the C1235 looking south towards Orcop.

KV2 and KV3: the views from the C1235/Orcop Hill Link Road junction looking south-west and south towards Orcop and Garway Hill.

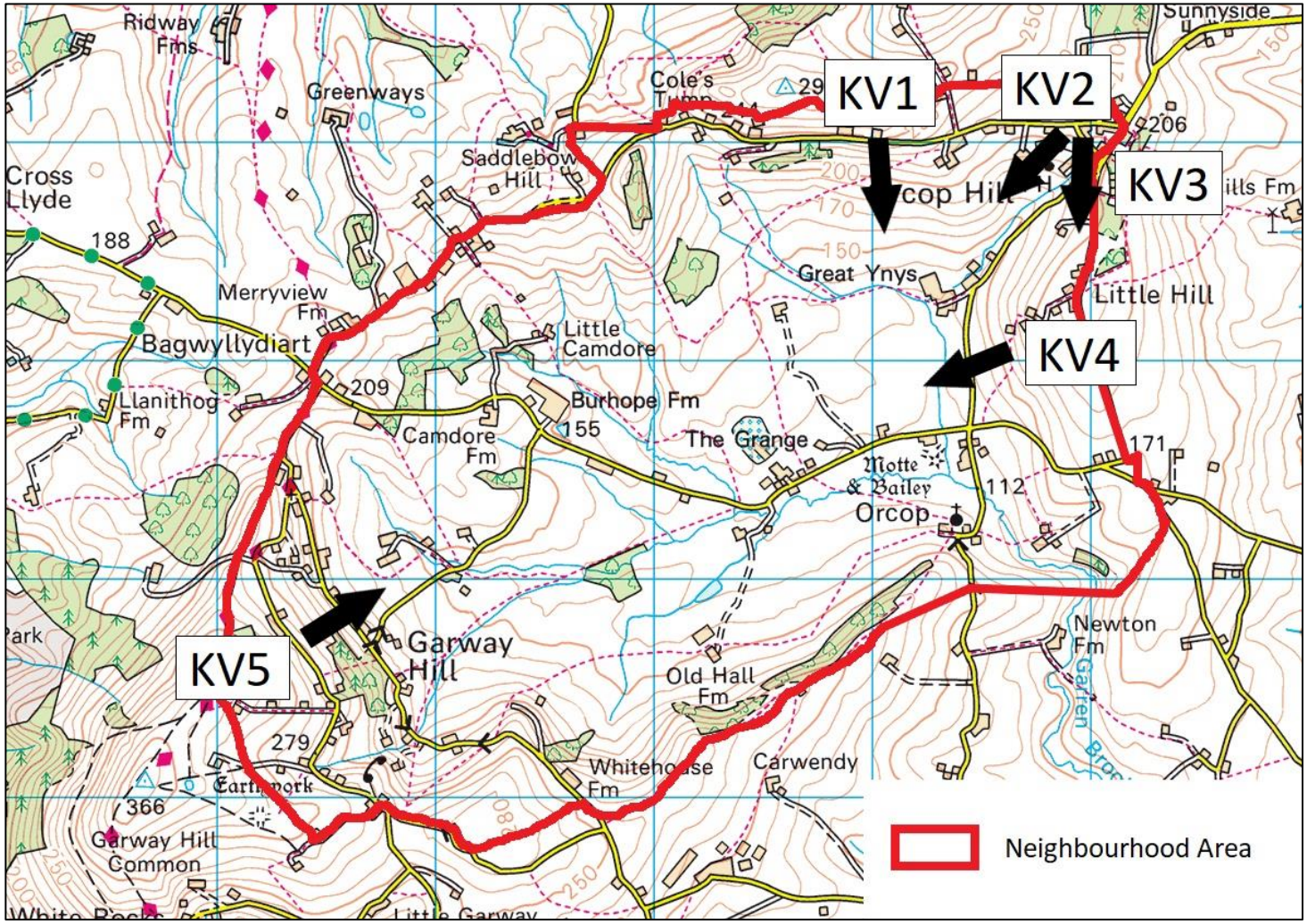
KV4: the view from public footpath at Little Hill looking south-west towards Garway Hill.

KV5: the view from Garway Hill looking east towards Orcop Hill.

A development proposal within sight of one of the above key views in the neighbourhood area, and likely to have significant impact on that view, will be required to provide a Landscape and Visual Impact Assessment or similar study to demonstrate that the levels of effects are acceptable, and that the scheme has been sited and designed sensitively and appropriately reflecting, respecting, and where possible, enhancing the landscape context within which it is situated.

4.8 The distinctive topography affords expansive views across and beyond the Neighbourhood Area, particularly from the elevated land on its borders. Views of the countryside were valued by 74% of questionnaire survey respondents and key views for protection were identified in responses. They are listed below and shown in the photographs, which are all taken from publicly-accessible locations in the Neighbourhood Area.

- Key View 1 (KV1): the view from the C1235 at Holly Cottage looking south towards Orcop (grid ref SO46972800).
- Key View 2 (KV2): the view from the junction of the C1235 and Orcop Hill Link Road looking south-west across Orcop basin (grid ref SO47912808).
- Key View 3 (KV3): the view from the junction of the C1235 and the Orcop Hill Link Road looking south towards Orcop Hill, Little Hill and the Orcop basin (grid ref SO47912808).
- Key View 4 (KV4): the view from public footpath at Little Hill looking south-west across Orcop basin towards Garway Hill (grid ref SO47672705).
- Key View 5 (KV5): the view from Garway Hill looking east across Orcop basin towards Orcop Hill (grid ref SO44312578).



Plan 4: Key views

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KV1: south towards Orcop

KV2: south-west across Orcop basin

KV3: south and south-west across Orcop basin

KV4: west towards Garway Hill

KV5: east from Garway Hill

Heritage

Policy ORC3 Heritage

Development proposals should protect, conserve and where possible enhance the historic environment and heritage assets in the Neighbourhood Area. In considering the impact of proposed development on heritage assets, appropriate account will be taken of their significance (including any contribution made by their setting) in accord with the National Planning Policy Framework and Herefordshire Local Plan Core Strategy policy LD4 by:

1. **giving great weight to conserving designated heritage assets; and**
2. **for non-designated heritage assets including archaeological sites, balancing the scale of any harm or loss against their significance; and**
3. **ensuring that proposals for the redevelopment, alteration or extension of historic farmsteads and other agricultural buildings are sensitive to their distinctive character, materials and form.**

4.9 Designated heritage assets in the Orcop Neighbourhood Area comprise two Scheduled Ancient Monuments and four listed buildings. The main area of heritage interest is in and around Orcop itself (Plan 5). The parish church of St John the Baptist is listed Grade II*; it dates from the early 13th century and was extensively restored in 1860.[10] The medieval churchyard cross close to the porch is both listed (Grade II) and a Scheduled Ancient Monument. On the lower ground to the north, Orcop Castle dates from the 12th century or earlier and is a Scheduled Ancient Monument. It occupies a commanding strategic position on the valley floor adjacent to the confluence of the Garren and Ynys Brooks. The scheduled area of 0.82 hectares comprises the tree-covered motte and adjacent bailey, part of which lies within Moat Farm. The surrounding open farmland to the south and west makes an important positive contribution to the significance of the monument. Orcop War Memorial at the nearby crossroads is listed Grade II by virtue of its historic and architectural interest. Finally, a 15th century timber-framed barn west of Old Hall Farmhouse is listed grade II*.

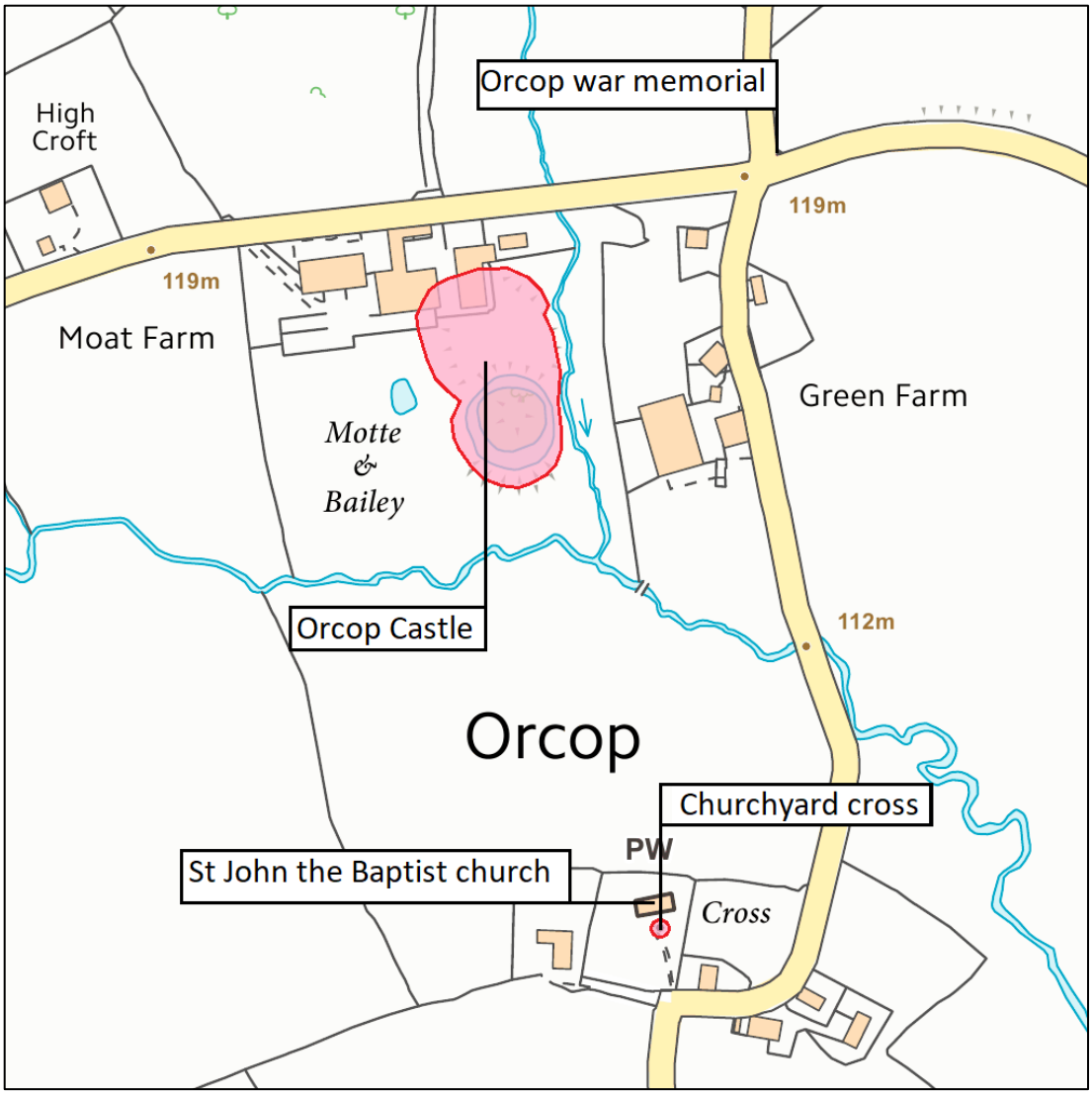
4.10 Other buildings of heritage interest and not formally designated are: [11]

- The former School (1857-8) next to the Church;
- Highcroft (1911) and The Grange (1860), to the west of Moat Farm, both built as vicarages; and
- Baptist Chapel at Orcop Hill, opposite the Fountain Inn;

[10] Brooks, A., and Pevsner, N., 2012, The Buildings of England: Herefordshire, Yale University Press, New Haven and London.
[11] See Brooks and Pevsner, ibid., for more information on the former School, Highcroft, The Grange, and the Baptist Chapel.

- The Cave (now Hamara), a restored vernacular dwelling south of the C1235;[12] and
- A former World War II searchlight building north of the C1235 (grid ref SO4774028269).

4.11 National planning policy and guidance and Local Plan Core Strategy policy LD4 *Historic environment and heritage assets* together give an overall framework for the protection of the historic environment. The National Planning Policy Framework requires that designated and non-designated heritage assets should be conserved in a manner appropriate to their significance. Development proposals should be assessed by taking account of the level of any designation, the scale of harm or loss of significance; and the public benefits of the proposal.



Plan 5: Designated heritage assets at Orcop

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[12] See planning application LPA ref P160489 for more information.

Policy LD4 applies to the County's designated and non-designated heritage assets, such as archaeological sites listed on the Herefordshire Historic Environment Record. Preserving historic buildings and archaeological sites was seen as very important by 62% of respondents to the questionnaire survey.

4.12 Historic farmsteads are a feature of the Neighbourhood Area and development proposals should have regard to their distinctive character including their plan form and layout. Due reference should be made, and full consideration be given to the Herefordshire Farmsteads Characterisation Project.

Orcop war memorial

Churchyard cross

St John the Baptist church

Design

Policy ORC4 Design

Development proposals should maintain and enhance the local distinctiveness of the Neighbourhood Area and achieve a high quality of sustainable design by:

1. **being in character with the built form of adjoining development with respect to siting, height, scale, detailing, density, building to building distances, means of enclosure and the use of materials; and**
2. **providing for energy and water conservation and the generation of renewable energy. All new housing should aim to achieve the highest standards of energy conservation, being ideally carbon neutral whilst as a minimum complying with Building Regulations; and**
3. **incorporating other sustainability measures including building orientation, sustainable construction methods and materials, and provision for the recycling of waste, composting, charging points for electric vehicles, cycle storage, and broadband; and**
4. **being capable of being safely accessed from the local road network without undue local environmental impacts which cannot be mitigated. Proposals which cannot satisfactorily mitigate such impacts will not be supported. The arrangements for access should wherever practicable include provisions for pedestrians and cyclists to encourage active travel; and**
5. **avoiding creating unacceptable impacts on residential amenity and tranquillity from noise, volume and nature of traffic generated, light, dust, odour or loss of privacy; and**
6. **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; and**
7. **retaining features of amenity and biodiversity value, such as mature trees, ponds and hedgerows, and incorporate new provision for wildlife; and**
8. **providing for new tree planting and other landscaping which is in keeping with the prevailing landscape character, uses locally appropriate and native species, integrates new buildings in their surroundings, and supports green infrastructure and the Herefordshire Ecological Network. Proposals for green infrastructure will be expected to be designed in accordance with the Building with Nature standards.**

4.13 Older properties in Orcop Hill are typically modest wayside dwellings built using local materials, predominantly stone and render; brick is relatively infrequent. Later 20th century

properties, occasionally bungalows, are usually set further back from the road in more generous plots and use a wider range of materials including brick as well as render. Recent schemes favour render with brick detailing (Birch View) or render, timber and brick detail (The Trees). Roof coverings are typically slate or tile. This palette of materials is also found at the settlement of Orcop. Overall, it is the varied use of local stone, render and brick in different combinations that gives the settlements their distinctive local character. The farmsteads and other wayside dwellings in the surrounding countryside use a similar range of materials.

4.14 Replies to the questionnaire survey showed that the most favoured objectives for a design policy for new housing were, in order of priority:

- to achieve high environmental standards and maximise energy efficiency (86%)
- to reflect local building styles (86%)
- to respect existing properties as to built form, location and scale (85%)
- to make use of traditional and local building materials (83%).

4.15 There was support for the further construction of bungalows (47%). Modern architecture was opposed by 53% and supported by 23%.

4.16 The design of individual buildings and their relationship to each other and their surroundings is an important aspect of the local environment. Local Plan Core Strategy policies LD1 *Landscape and townscape* and SD1 *Sustainable design and energy efficiency* detail a wide range of factors to be assessed in considering the design of new development. The above policy supplements the strategic policies by reflecting the survey feedback. This encourages minimising the carbon footprint of development and using building materials that blend with existing development and the wider environs. It is intended to be applicable to all forms of development as relevant, with an emphasis on new housing proposals. New build dwellings and residential conversions are encouraged to use renewable energy sources where appropriate such as solar panels and air source heat pumps, and to promote water conservation such as through water harvesting. In respect of the natural environment and the provision of green infrastructure delivering high quality places for people and wildlife, developers should follow the Building with Nature standards throughout the development process, from planning and design to long-term management and maintenance.[13]

4.17 The questionnaire survey demonstrated a range of concerns over traffic in the Neighbourhood Area including for the safety of pedestrians and cyclists on the narrow rural lanes. It is important that new development does not unduly add to these issues. Local Plan Core Strategy policies SS4 *Movement and transportation* and MT1 *Traffic management, highway safety and promoting active travel* deal with highway requirements, and these are further detailed in Herefordshire Council's Highway Design Guide for New Developments. Where necessary, a Transport Assessment (or Statement) should be provided setting out measures

[13] See https://www.buildingwithnature.org.uk/.

required to deal with the anticipated transport impacts of development. This should include providing for pedestrians and cyclists so as to improve and encourage safe active travel.

4.18 The creation of new accesses to serve development can have notable environmental impacts. For example, achieving the required sightlines for new or improved junctions may lead to undue impacts on local character through the loss of roadside vegetation, with a general "opening up" of what may have been a relatively closed landscape setting. Proposals should seek to mitigate such adverse impacts.

Wastewater treatment

Policy ORC5 Wastewater treatment

Development proposals which are to be served by non-mains foul drainage should provide a wastewater management strategy and system design to accompany outline or full planning applications to include:

1. **method statement for the treatment and disposal of wastewater. The provision of or connection to a package sewage treatment works should be considered before the use of septic tanks. If septic tanks are proposed, the method statement should demonstrate that use of a package sewage treatment works is not suitable or viable; and**
2. **where discharge to ground by infiltration is proposed, an assessment of likely ground conditions, identification of annual water table levels and their seasonal variation, and the results of testing all to the required standards to confirm that infiltration is a viable means of discharge; and**
3. **confirmation of any requirements for works which are off-site, and/or which may affect or cross third-party land, and for connections to receiving drains/watercourses; and**
4. **proposed arrangements for adoption, management and maintenance; and**
5. **demonstration that there will be no undue loss of amenity to occupiers of residential property including from noise, odour and drainage conditions; and**
6. **demonstration of nutrient neutrality in accord with policy ORC1.**

The use of cesspools will only be supported to serve existing dwellings and where it has been shown that there are no other viable means of wastewater treatment available. This would occur in exceptional circumstances such as the replacement or servicing of a defective treatment plant when a cesspool is required for a limited period until remedial works have been completed. Proposals for cesspools must include a rigorous assessment of the potential effects of their operation and demonstrate that there will be no adverse effect on residential amenity, groundwater sources and natural drainage water quality objectives. The use of cesspools will not be supported to serve new dwellings.

4.19 There is no mains foul drainage in the Neighbourhood Area. In the questionnaire survey, the challenges of ensuring the environmentally-acceptable treatment of wastewater was seen as a constraint to development by 41% of respondents. Recent developments in Orcop Hill at The Trees and on land next to the Fountain Inn are served by individual package treatment plants and drainage field.

4.20 National guidance allows for the use of package treatment plants or septic tanks as options where there is no available public wastewater treatment works. Local Plan Core Strategy

policy SD4 *Wastewater treatment and river water quality* sets out a sequential approach, with first preference being for the provision of or connection to a package treatment works (discharging to watercourse or soakaway), followed by septic tank (discharging to soakaway). Sustainable forms of water treatment such as reed beds may be used as alternatives to or in combination with foul water treatment and disposal.[14]

4.21 Herefordshire Council has published a checklist of the information on flood risk and drainage which will be required to accompany any planning application.[15] This includes details of the need to provide an appropriate and acceptable foul water management strategy. It includes a requirement to show that, where ground infiltration is proposed, the local ground conditions are such that this is a viable means of foul water discharge. Proposals should be drawn up in accordance with the checklist and the Council's SuDS Handbook, which requires compliance with and provides a link to the General Binding Rules on the DEFRA website. This will ensure that sufficient and robust information is available on the proposed means of foul drainage prior to planning permission being granted.

4.22 The use of cesspools to serve new dwellings[16] in the Neighbourhood Area will not be supported. This is because of the environmental risks and impacts associated with their operation and the weight given by parishioners to protecting the valued environment of the Neighbourhood Area from the impacts of new development. Incorrectly-maintained cesspools can cause pollution by contaminating the ground, groundwater or surface water through leakage or overflowing. In addition, the noise, odour and disturbance associated with the regular emptying of cesspools by sludge tankers may also be harmful to residential amenity. The requirement for regular emptying by licensed tankers leads to environmental costs in terms of noise, dust, congestion, additional fuel consumption and CO2 emissions. The rural highway network is characterised by U- and C-class single-track lanes, blind bends and a lack of adequate passing places, such that there are potential impacts from congestion and on road safety from increased HGV traffic.

4.23 Any proposals for cesspools that are made must be accompanied by a rigorous assessment of the potential effects on the immediate and wider environment. This should include detailed information on the required frequency and number of tanker movements for emptying and on the associated noise, odour and disturbance to nearby residents. The assessment should also demonstrate certainty that the final destination of the effluent is to a wastewater treatment facility where it can be processed without compromising water quality targets or the integrity of the River Wye Special Area of Conservation.

[14] Local Plan Core Strategy paragraph 5.3.70.
[15] https://www.herefordshire.gov.uk/downloads/file/14591/planning-applications-flood-risk-and-drainage-checklist.
[16] That is, for new dwelling units proposed either as new build or arising from the conversion of redundant rural buildings.

Surface water and flood risk

Policy ORC6 Surface water and flood risk

Development proposals should provide a surface water management strategy to accompany outline or full planning applications to demonstrate effective surface water drainage and the management of flood risk. In doing so, full use should be made of sustainable drainage systems. Designs should maximise the retention of surface water within the curtilage of the development site and minimise runoff. There should be no increase in runoff or flood risk affecting neighbouring land and property and wherever possible betterment should be achieved through a reduction in runoff rate and volumes.

4.24 The Neighbourhood Area drains to the south-east via the Garren Brook, which is fed by numerous tributaries from the higher land on the edges of the parish. There are localised areas of Flood Zone 3 associated with the corridor of Garren Brook downstream from east of Mill Wood (Plan 3). More widely, poor ground conditions combined with the topography of the area mean that achieving effective surface water drainage and managing flood risk are recognised issues which may constrain development. In the questionnaire survey, respondents identified surface water drainage (29%), fluvial flood risk (15%), field run-off (33%), and road run-off (35%) as constraints to development, particularly in respects of various locations at Orcop Hill.

4.25 Local Plan Core Strategy policy SD3 *Sustainable water management and water resources* provides for the sustainable management of water resources. This is supported by a checklist of the information on surface water drainage and flood risk which will be required to accompany any planning application.[17] Proposals should be drawn up in accordance with the checklist and the Council's Sustainable Drainage Systems (SuDS) Handbook so that suitable evidence is provided to demonstrate that the proposed means of surface water drainage is a viable solution. This may include infiltration tests to the required standards and information on annual water table levels and their seasonal variation.

4.26 Development should not exacerbate any existing drainage and flooding problems and should aim to provide betterment wherever possible. Full use should be made of sustainable drainage techniques which may include swales, infiltration basins, retention/attenuation ponds, rainwater harvesting, green roofs, permeable paving, and soakaways as appropriate to the site's hydrological context. Designs should comply with statutory distancing of soakaways from buildings and neighbouring properties/boundaries, to ensure there is adequate space to safely discharge within a curtilage.

[17] https://www.herefordshire.gov.uk/downloads/file/14591/planning-applications-flood-risk-and-drainage-checklist.

Renewable and low carbon energy projects

Policy ORC7 Renewable and low carbon energy projects

Development proposals for small-scale renewable and low carbon energy generation to meet domestic needs will be supported where it is shown that the individual and cumulative impacts on the natural and historic environment, amenity and highway safety and capacity are or can be made acceptable.

4.27 National planning policy and guidance support positively expressed and balanced policies in Neighbourhood Development Plans that allow the need for renewable or low carbon energy to be considered alongside environmental factors, cumulative impacts and the implications for heritage assets and local amenity. Local Plan Core Strategy policy SD2 *Renewable and low carbon energy generation* includes protection for amenity and the natural and historic environment.

4.28 The questionnaire survey canvassed opinion about the scope for renewable energy schemes. Respondents generally favoured such developments provided they were domestic in nature, with majority support for all the options canvassed on this basis (solar, ground source heat pumps, biomass and wind turbines). They were less supportive of schemes proposed on a commercial basis. This suggests a preference, reflected in the above policy, for small-scale domestic proposals which would be in keeping with the rural character and landscape of the Neighbourhood Area. Air source heat pumps may also have a role.

4.29 Renewable energy micro-generation, through for instance photo-voltaic panels, should be included in new development as part of the overall approach to a scheme's sustainability (see policy ORC4). Commercial scale anaerobic biodigesters are to be considered under policy ORC14 on agricultural and forestry development.

4.30 In supplementing the County-level approach, reference is made in the above policy to highway safety and capacity as an issue to be considered, because of the narrowness of single-track rural lanes in the Neighbourhood Area; and to cumulative impacts.

4.31 The NDP does not identify sites or areas as suitable for wind energy development, having regard to the lack of backing for commercial-scale renewable energy generation from the community evident in the questionnaire survey together with the potential for harm to landscape character.

5. HOUSING AND COMMUNITY

Local Plan Core Strategy requirements for housing

5.1 Local Plan Core Strategy policy RA1 *Rural housing distribution* sets an indicative housing growth target of 14% or 1150 dwellings for the wider Ross-on-Wye Rural Housing Market Area, which includes the Orcop Neighbourhood Area. The target is a minimum and is to be used as a basis for the preparation of NDPs, with the appropriate scale of development in any given NDP being determined by local evidence and environmental factors.

5.2 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).

5.3 The Local Plan Core Strategy also indicates that settlement boundaries be defined in Neighbourhood Development Plans for those settlements which are earmarked for proportionate housing development. This is so that new housing can be best situated in relation to existing services and facilities; and to avoid unnecessary, isolated development in the open countryside, in line with national planning policy.

Housing delivery

5.4 The NDP has based its approach to housing delivery on the growth target set out above. This is equivalent to at least 26 new dwellings being provided in the Neighbourhood Area between 2011 and 2031. From this starting point, account has also been taken of the following:

- the amount of development in the Neighbourhood Area since the start of the plan period. Between 2011 to 2021, nine dwellings have been built or granted planning permission.
- the availability and suitability of land and buildings in and adjacent to the settlements of Orcop Hill and Orcop and in the rural parts of the Neighbourhood Area for housing development. This has been investigated through a Call for Sites and subsequent site assessments, thereby enabling local evidence and environmental factors to be taken into account. This work has informed the allocation of a site for new housing. In addition, two sites within the scope of Local Plan Core Strategy policy RA3 have been identified. These comprise the re-use of redundant rural buildings at Green Farm and a proposed dwelling to meet an agricultural need at Bagwyllydiart.
- The likely number of new dwellings which will come forward in the period up to 2031 as 'windfalls' - sites not specifically identified in a development plan. All of the dwellings which have been built or granted planning permission since 2011 comprise windfalls.

Such sites are expected to continue to arise, albeit at a reduced rate reflecting the operation of the policies of the NDP.[18]

5.5 Table 1 shows the resultant position with regard to housing delivery in the Neighbourhood Area, taking into account completions, commitments and plan proposals.

ORCOP NEIGHBOURHOOD AREA HOUSING REQUIREMENT 2011-2031	**26**
Dwellings completed 2011 – April 2021	5
Dwellings with planning permission, 1 April 2021	4
Policy ORC8 Land west of Birch View	3
Dwellings in scope of LPCS policy RA3	5
Windfall allowance	5
TOTAL HOUSING DELIVERY	**22**

Table 1: Housing delivery, Orcop Neighbourhood Area 2011-2031

5.6 Table 1 indicates a shortfall of four dwellings against the proportionate requirement. This is not considered to be significant in terms of conformity with the strategic policies or compliance with national policy and guidance. In particular, the approach is consistent with the achievement of sustainable development. A detailed justification is provided at Appendix B. In summary:

- The NDP is based on the indicative housing growth target whilst taking appropriate account of local evidence and environmental factors specific to the Neighbourhood Area. This is pursuant to policy RA1. These factors include a lack of suitable and available sites within or adjacent to Orcop Hill and Orcop, the limited capacity of the rural road network to accommodate development, and other infrastructure issues such as the provision of foul drainage. Whilst the NDP allocates a site for housing development at Orcop Hill, recognises other potential in the countryside, and incorporates a windfall allowance, the net result of these factors is that the indicative housing growth target figure for the rural Housing Market Area level, when applied proportionately to the Neighbourhood Area, cannot be shown to be met.
- Residents in the Orcop Neighbourhood Area must travel to neighbouring parishes to access day-to-day services, and further afield for higher-order services such as secondary education, health care, and employment. To promote sustainable development in rural areas, national and strategic policy seeks to locate housing where it will enhance or maintain the vitality of rural communities, especially by supporting

[18] The windfall allowance has been calculated by projecting forward the 2011-2019 completions and commitments at a pro-rata rate of 50%. See the Housing Delivery Report for further details.

local services.[19] Because of the relative lack of local services, the provision of further housing in the Orcop Neighbourhood Area over and above that proposed in the NDP will not promote sustainable development. Nor will it promote sustainable transport, given the limited opportunities that are realistically available to foster the use of walking, cycling and public transport to access services outside the Neighbourhood Area.

- Strategic policy RA1 sets numerical growth targets at the rural Housing Market Area level, rather than for individual Neighbourhood Areas. The indicative housing growth target set for the Ross-on-Wye Rural Housing Market Area is 1150 new dwellings 2011-2031. At April 2021, this target had already been exceeded by 38% with 1592 dwellings having been built, committed through planning permissions or allocated in NDPs.[20] The proposed approach to housing delivery in the Orcop Neighbourhood Area will not hinder or undermine achieving the strategic approach to rural housing distribution in policy RA1.

5.7 In short, the NDP provides an approach to housing delivery which balances proportionate growth with environmental factors, the pattern of local service provision, the practicalities of rural transport, and the need to promote sustainable development.

[19] National Planning Policy Framework, paragraph 78.
[20] Herefordshire Council, Authority Monitoring Report, Section 3 Neighbourhood Plans July 2021, figure 34.

Settlement boundaries and site allocation

Policy ORC8 Settlement boundaries and site allocation

Settlement boundaries are designated for Orcop Hill and Orcop, as defined and shown on Plan 6 for Orcop Hill and Plan 7 for Orcop. Proposals for housing inside the settlement boundaries will be supported where they are in accordance with other development plan policies. 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.

Land west of Birch View, Orcop Hill is allocated for the development of around three new dwellings (Plan 6). 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.

5.8 Settlement boundaries for Orcop Hill and Orcop are shown on Plans 6 and 7. The boundaries show the planned extent of the main built-up form for each settlement and generally follow physical features, principally curtilages marked by fence or hedgerows. They have been prepared having regard to criteria in Herefordshire Council guidance.[21]

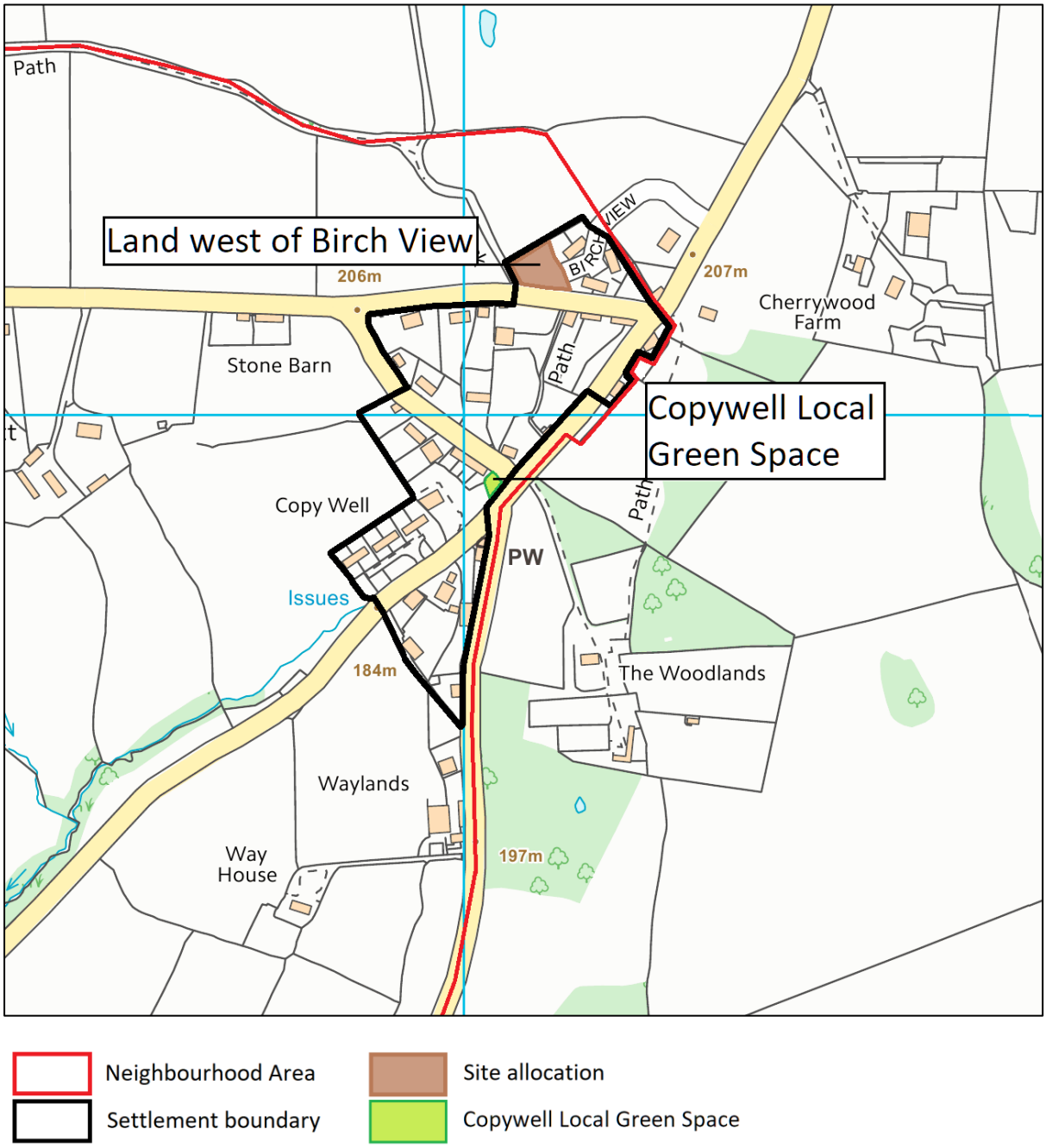
5.9 New housing will be supported inside the settlement boundaries where it is appropriate to its context, respects local character, and meets local needs and demand. Land outside the settlement boundaries is defined as countryside in planning terms.

Orcop Hill

5.10 Orcop Hill is the largest settlement in the Neighbourhood Area, with a nucleated form grouped around a staggered crossroads. It comprises a mix of older wayside properties and small developments such as Birch View and the recently-completed scheme at The Trees. Some properties to the north are outside the Neighbourhood Area, being within Much Dewchurch parish, and have not been included in the settlement boundary for this reason.

5.11 Policy ORC8 allocates land at Orcop Hill for new housing with an indicative capacity for around three new dwellings in a terraced format. The site is to the west of Birch View and is also shown on Plan 6. The existing dwellings at Birch View are served by a treatment plant and drainage field which are within the site allocation. It is understood that there is available capacity in the treatment plant (to be confirmed). Highway access is available via the Birch View private road. The proposed addition of three further dwellings to the existing six is subject to highway authority approval.

[21] Herefordshire Council, Neighbourhood Planning Guidance Note 20 Guide to settlement boundaries, June 2015.



Plan 6: Orcop Hill settlement policies

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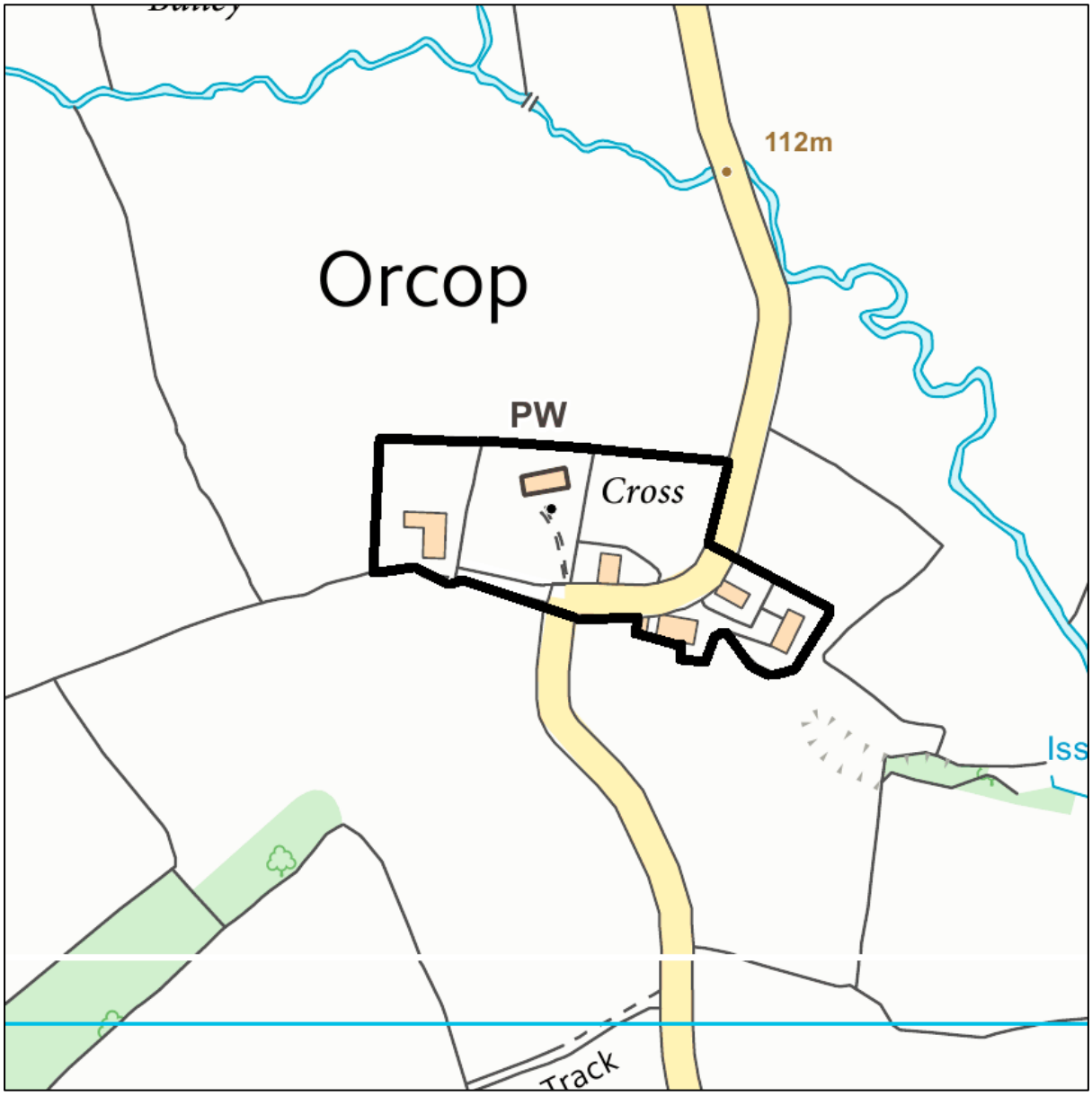
Orcop

5.12 The settlement of Orcop lies to the south of Orcop Hill across the valley of the Garren Brook. It is a compact cluster of properties grouped around the church of St John the Baptist.



Settlement boundary

Plan 7: Orcop settlement boundary

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Housing mix

Policy ORC9 Housing mix

Housing proposals in the Neighbourhood 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 smaller properties.

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.

5.13 It is important to make sure that housing of the right kind is provided to meet local needs in the Orcop Neighbourhood Area. The Local Plan Core Strategy recognises the need to plan for a range and mix of house types and sizes which can contribute to balanced communities (policy H3 *Ensuring an appropriate range and mix of housing*). This is all the more important in the Neighbourhood Area because housing growth will be relatively limited by virtue of the rural location. For these reasons, any new dwellings should be demonstrably relevant to local needs in order to help deliver sustainable and balanced communities.

5.14 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 bedrooms). Larger dwellings of 4 or more bedrooms were not favoured. There was majority support for a range of types of housing, including conversion schemes, supported accommodation, self-build and live/work as well as private ownership. Comments referred to the need for a mix of size and tenure to help ensure a diverse and varied community, the priority being for dwellings that younger people and families could afford.

5.15 These survey findings are echoed in evidence from the latest Housing Market Area Needs Assessment.[22] Table 2 is taken from the Assessment and shows the recommended housing mix for the Ross-on-Wye Rural Housing Market Area (which includes the Orcop Neighbourhood Area). For market housing the main requirement is for 3-bedroom (50%) and 2-bedroom (25%) properties. For affordable housing, there is a reduced emphasis on larger dwellings with greater proportions of 1- and 2-bedroom homes being required for both affordable home ownership (55%) and rent (65%).

[22] Housing Market Area Needs Assessment, Iceni Projects Limited for HC, July 2021.

Size	Market housing	Affordable home ownership	Affordable rented housing
1 bedroom	5%	20%	35%
2 bedroom	25%	35%	30%
3 bedroom	50%	35%	30%
4+ bedroom	20%	10%	5%

Table 2: Recommended housing mix by tenure and size, Ross-on-Wye Rural HMA 2020-2041

Source: Housing Market Area Needs Assessment table 12.11.

5.16 The evidence underpinning strategic policy H3 also includes *A Study of the Housing and Support Needs of Older People 2012.* [23] This confirms there is an increasing requirement for new housing to cater for older people. Policy H3 reflects this, seeking to ensure that new housing takes account of the changing needs of an ageing population, and that developments contain a range of house types, including, where appropriate, bungalows. The Neighbourhood Area has a relatively older demographic, with the proportion aged 65 and over expected to rise from 24% in 2011 to an estimated 27% in 2019, consistently above the equivalent County figures (21% and 25% respectively).

5.17 A parish Housing Needs Survey was undertaken in 2014. This found six households wishing to move to another home in the parish within three years, of whom one required affordable accommodation, two required private rental accommodation and three were undetermined. At the time there were eight housing association units in the parish, two being rented and six being low-cost market housing also subject to a local connection occupancy restriction.

5.18 Taking all this into account, the above policy will help deliver sustainable and balanced communities in the Neighbourhood Area by encouraging a suitable mix of housing. All forms of housing development, including conversions as well as new development, will be expected to show that they are contributing to meeting local housing needs. It is particularly important that new housing proposals in the Neighbourhood Area address the requirement for smaller accommodation. This will help meet housing market pressures and local need. In addition, the provision of new housing suitable for older people will address requirements and help allow existing residents to stay in the community, enabling downsizing and so the release of existing larger homes for family occupation. Housing will also be sought as live/work and self-build units.

[23] Herefordshire Council, A study of the Housing and Support Needs of Older People in Herefordshire, 2012.

Community facilities

Policy ORC10 Community facilities

Existing community facilities will be retained in accordance with Herefordshire Local Plan Core Strategy policy SC1. They are listed below and shown on Plan 8:

- **Orcop Parish Hall**
- **Places of worship (Baptist Chapel at Orcop Hill, St. John the Baptist Church at Orcop, and Methodist Chapel, Garway Hill)**
- **The Fountain Inn public house, Orcop Hill.**

Development proposals for the enhancement of existing community facilities and for new provision including a children's play area and facilities for sport and recreation will be supported provided that:

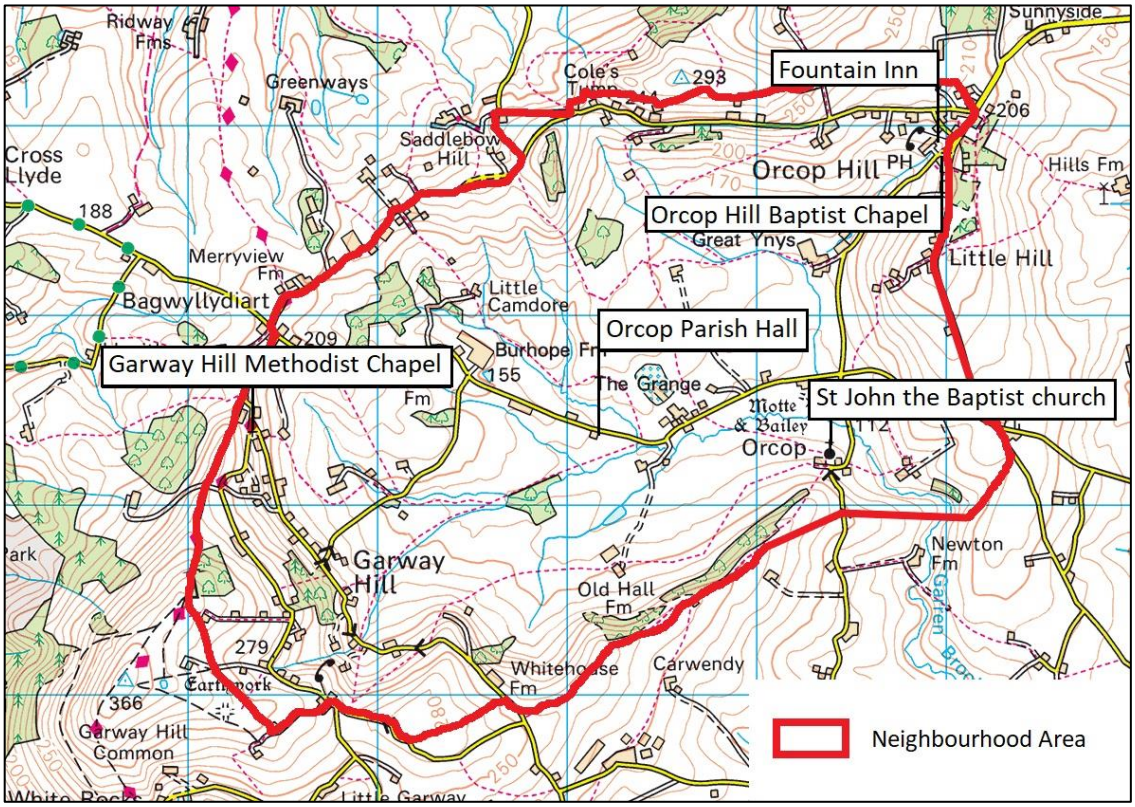
1. **the siting, scale and design respects the character of the surrounding area; and**
2. **the local road network can safely accommodate the additional traffic; and**
3. **sufficient provision is made for off-street vehicle and cycle parking and full use is made of the available opportunities to improve access on foot, by cycling or by public transport.**

5.19 Community facilities are important in meeting the current and future needs of residents. Replies to the questionnaire survey confirmed the importance placed on retaining local facilities such as the Parish Hall (very important for 88% of respondents) and the Fountain Inn (77%). In terms of new provision, there was support for a children's play area and for sport and recreation facilities.

5.20 Existing community facilities listed in the policy and identified on Plan 8 will be retained, and enhancements and proposals for new provision supported, in line with Local Plan Core Strategy policy SC1 *Social and community facilities*. This provides that facilities will be retained unless an appropriate alternative is available or can be provided, or that the facility can be shown to be no longer required, viable or fit for purpose. Where appropriate, it must have been vacant and marketed for community use without success.

Orcop Parish Hall

Orcop Hill Baptist Chapel



Plan 8: Community facilities

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St John the Baptist, Orcop

Garway Hill Methodist Chapel

Fountain Inn, Orcop Hill

Copywell Local Green Space

Policy ORC11 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.

5.21 National planning policy allows NDPs to designate land as Local Green Space in order to protect green areas of particular importance to local communities. Local Green Space designation should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should be capable of enduring beyond the end of the plan period. The designation should only be used where the green space concerned is in reasonably close proximity to the community served, is demonstrably special to the community and holds a particular local significance, and is local in character and not an extensive tract of land.[24]

5.22 The questionnaire survey highlighted the importance to the local community of a small area of green space at the heart of Orcop Hill. The 'village green' is around 250 square metres of land at the junction of Tomlins Field Road, Link Road and Little Hill Road. It is home to a bus shelter, parish notice board and disused telephone box which are all set to the road frontage. In the survey, 85% of respondents thought it should be protected. It meets the requirements for Local Green Space designation, being in the centre of the community served, demonstrably special, and not an extensive tract of land. It is designated as Local Green Space.

[24] NPPF paragraphs 101 and 102.

6. RURAL ECONOMY

Rural businesses

Policy ORC12: Rural businesses

Development proposals for the creation or expansion of small-scale business enterprises will be supported provided that:

1. **they are of a scale, type and nature appropriate to their location, and avoiding isolated new development; and**
2. **the impacts on highway safety and capacity are or can be made acceptable, with adequate off-road parking for staff, delivery vehicles and visitors; and**
3. **there are no undue impacts on residential amenity, or on the natural and built environments; and**
4. **in the case of proposals in the countryside, full use is made of the available opportunities to improve access on foot, by cycling or by public transport.**

Wherever possible, use should be made of sites which are within or physically well-related to the settlements of Orcop Hill or Orcop, and of existing buildings and previously-developed land in preference to new development on greenfield sites.

6.1 Employment in the Neighbourhood Area includes mixed farming, small businesses, local services and home working. Self-employment is a significant feature - 28% of working age residents were self-employed in 2011, higher than in the County (14%) or the West Midlands (8%). Home-working is also notable; 13% of working age residents worked at or mainly from home in 2011, more than for Herefordshire as a whole (6%).

6.2 The questionnaire survey demonstrated majority support for a range of types of economic activity as being suitable and compatible with the rural surroundings. Farming, forestry, livery and stabling, food and drink production, tourism and leisure (including arts and crafts) and small businesses were all supported by over half of respondents. A majority wanted to see the NDP support home-working, the appropriate re-use and conversion of redundant rural buildings to provide local employment, and the extension of existing business premises.

6.3 Comments to the survey gave support for new businesses in the Area and for increasing employment opportunities with the clear proviso that these should be in keeping with the prevailing rural character. There were concerns with the size and scale of any new buildings and the potential for loss of amenity, together with calls to improve infrastructure such as broadband and transport. A key limiting factor on economic development was seen to be the Neighbourhood Area's remote rural location and the single-track nature of much of the road network.

6.4 Local Plan Core Strategy policy RA6 *Rural economy* gives support for a wide range of employment uses in the County's rural areas through the re-use of redundant rural buildings (also see policy RA5), homeworking (policy E3) and tourism (policy E4). Policy RA6 sets requirements to safeguard the character of locations and their settings, residential amenity, highway safety, and water quality. Policy E2 *Redevelopment of existing employment land and buildings* safeguards land and buildings which provide employment from redevelopment for other purposes.

6.5 In line with this strategic approach, the NDP supports the expansion of existing businesses and suitable small-scale development for employment purposes through both conversions and (in acceptable locations) new building. The aim is to enable employment in the Neighbourhood Area to continue to evolve, with a flexible approach to growing enterprises and to enabling self-employment which is an important part of the local economy. It is envisaged that this will be delivered through the sensitive conversion and re-use of redundant rural buildings for business use; extensions to existing premises; new buildings for small-scale employment uses provided they are not located in an isolated countryside setting; enabling home working; the development and diversification of farm, forestry and other land-based rural businesses; and tourism, craft and leisure proposals, particularly those which seek to sustain, enhance and promote a better understanding of the local natural, historic and cultural environment. The provision of short-term holiday accommodation to support the tourism 'offer' is considered further below.

Signage at Orcop Hill

Holiday accommodation

Policy ORC13 Holiday accommodation

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 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.**

6.6 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 ORC13 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.

6.7 There was majority support in the questionnaire survey for tourism and leisure proposals in general, subject to the previously-mentioned concerns over scale, loss of amenity and infrastructure. However, such proposals should not unduly impact on the very qualities which attract tourists in the first place, such as the remote quality of the Neighbourhood Area and its landscape character. As well as from the provision of the accommodation itself, impacts on these qualities may also arise through the introduction or intensification of vehicular access; lighting; and ancillary equipment such as gazebos, garden structures and hot tubs. It is also important that the additional demands which will be placed on infrastructure can be shown to be appropriately met. As highlighted elsewhere in the NDP and in the questionnaire survey, key issues with regard to infrastructure are drainage and highway capacity.

6.8 The occupation of holiday accommodation only by people on short-term holiday use and not as a sole or main residence will normally be controlled by planning condition. Proposals for permanent residential occupation will be considered in accordance with relevant housing policies of the Development Plan

Agricultural and forestry development

Policy ORC14 Agricultural and forestry development

Proposals for agricultural and forestry development requiring planning permission should be able to demonstrate that they meet the following requirements. Account will also be taken of ancillary works and buildings, and of any other existing, permitted or proposed similar developments in the locality so that cumulative impacts can be considered:

1. **the local highway network and the proposed means of vehicular access can cater safely for both the volume and type of vehicles anticipated, and the proposed access is environmentally acceptable; and**
2. **the impacts on landscape character and visual amenity are acceptable, or are capable of being satisfactorily mitigated by a landscaping scheme which is itself acceptable; and**
3. **there will be no undue loss of amenity to the occupiers of residential properties, including by way of external lighting, the design and siting of any installation, traffic, or odour, noise and air pollution; and**
4. **there are no unacceptable impacts on biodiversity, heritage assets or the utility and enjoyment of public rights of way. The provision of safe off-road active travel links within developments is encouraged; and**
5. **surface water and wastewater are acceptably and appropriately managed with no adverse impact on local watercourses in respect of water quality, flood risk, pollution or soil erosion.**

6.9 Changes in farming have seen pressures arise for larger-scale developments in the countryside such as intensive livestock units, biodigesters, glass houses and polytunnels. Permitted development rights for agriculture and forestry mean that only buildings above certain size thresholds require planning permission. Local Plan Core Strategy policy RA6 *Rural economy* provides that proposals to diversify the rural economy will be permitted provided that there are no undue impacts due to scale or on residential amenity, traffic safety and water quality.

6.10 Responses to the questionnaire strongly supported arable and livestock farming, forestry and related activities as types of economic development to be encouraged. However, there was little support for intensive farming, such as polytunnels or intensive livestock units, being opposed by 71% of respondents.

6.11 Larger-scale proposals and their supporting infrastructure may give rise to a range of possible impacts including on the landscape, the highway network, water quality and public rights of way. The above policy is intended to help ensure that new agricultural and forestry development is undertaken sensitively and with due regard to its implications. Larger scale

development proposals should provide a Transport Assessment or Statement depending on the size and impact on the highway, written in accord with Department of Transport guidance.

6.12 Herefordshire Council has issued a Polytunnels Planning Guide which provides a comprehensive assessment of the relevant issues and a set of guidelines.[25] These guidelines will also be taken into account in deciding whether polytunnel proposals requiring planning permission are to be supported.

Looking west from the crossroads

[25] https://www.herefordshire.gov.uk/download/downloads/id/14577/polytunnels_planning_guide_2018.pdf

7. DELIVERING THE NEIGHBOURHOOD DEVELOPMENT PLAN

7.1 The NDP is a long-term planning document which will be implemented in the period up to 2031. Orcop Parish Council will seek to implement the objectives of the NDP with the aim of delivering the sustainable development of the Neighbourhood Area.

7.2 The principal means of doing this will be through decisions on planning applications, taken by Herefordshire Council as local planning authority in accordance with the development plan unless material considerations indicate otherwise. The NDP will, when made, form part of the overall 'development plan'.

7.3 When responding to consultations on planning applications, the Parish Council will base its response on the policies set out in the NDP. This will include supporting proposals which meet the policies of the NDP, and opposing those which do not.

7.4 The Parish Council will work pro-actively with applicants and the local planning authority to seek to support planning applications that improve the economic, social and environmental conditions of the Neighbourhood Area.

7.5 The Parish Council will monitor the implementation of the policies in the NDP and keep under review the need for the NDP to be amended and updated. Policies in this document may be superseded by other Development Plan policies, such as those arising from the current update of the Herefordshire Local Plan Core Strategy, or by the emergence of new evidence. Where policies in the NDP become out-of-date, the Parish Council, in consultation with Herefordshire Council, will decide how best to up-date the document.

Community actions

7.6 The formal role of the NDP is the setting of planning policies which deal with land use and development. However, in preparing the NDP and in responding to the questionnaire survey the local community has identified ways of improving the local area which extend beyond this remit. These generally concern infrastructure and transport matters. Such issues cannot be addressed through the land use planning policies of the NDP but may be expressed as Community Actions to be undertaken or led by Orcop Parish Council in partnership with others. These are set out in Table 3. The Community Actions shown reflect the concerns expressed in the residents' survey. Where possible and appropriate, developer contributions will be sought to deliver, or support the delivery, of improvements to these aspects of parish life.

7.7 The Community Actions do not form part of the Neighbourhood Development Plan and do not constitute planning policy.

Ref.	Topic area	Community Action
CA1	Highways – road safety for all users	The Parish Council will continue to work with Herefordshire Council and other partners to identify and implement measures to address the issues raised in the NDP questionnaire survey where possible, to include speed indicator devices, footway improvements, the enforcement and lowering of speed limits, and weight/parking restrictions.
CA2	Highways – road maintenance	The Parish Council will continue to work with Herefordshire Council to address issues of highway maintenance including drainage (road run-off, ditches and gullies) as they arise.
CA3	Highways – other matters	The Parish Council will continue to work with Herefordshire Council to address other highway issues including the further provision of passing places in justified locations, traffic calming, hedge and verge cutting, and road and footpath signage.
CA4	Public transport provision	The Parish Council will work with Herefordshire Council, bus operators and Community Transport providers to investigate ways of addressing issues identified and will continue to press the case for existing service levels to be maintained and for improvements to be delivered.
CA5	Walking and cycling	The Parish Council will continue to work with landowners to promote the maintenance of public rights of way throughout the Parish and to seek improvements to connectivity in and around the settlements to foster walking and cycling as alternatives to use of the private car for short trips.
CA6	Communications and broadband	The Parish Council will promote and support improvements to communications infrastructure by working in partnership with Herefordshire Council and network operators.
CA7	Community information and communication	The Parish Council will continue to maintain and improve ways of providing information to and communicating with the community including use of notice boards, publications and the website.
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.
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.

Table 3: Community Actions

APPENDIX A: EVIDENCE BASE

A.1 The following planning policy documents, reports, consultation evidence and other survey material have been used in drawing up the NDP.

HC = Herefordshire Council

National level evidence

Ministry of Housing, Communities and Local Government, National Planning Policy Framework, 2021.

Ministry of Housing, Communities and Local Government, Planning Practice Guidance at https://www.gov.uk/government/collections/planning-practice-guidance.

Department of Transport guidance for Transport Assessments, Statements and Travel Plans at https://www.gov.uk/guidance/travel-plans-transport-assessments-and-statements.

Census 2011 at https://www.ons.gov.uk/census/2011census.

Office for National Statistics, Small area population estimates 2019.

Natural England, National Character Area profile 104: South Herefordshire and Over Severn, 2014.

Environment Agency and Natural England, River Wye Special Area of Conservation, Nutrient Management Plan, Evidence base and options appraisal, Action Plan, 2014.

Environment Agency, Flood Map for Planning at https://flood-map-for-planning.service.gov.uk/

Historic England, National Heritage List for England at https://historicengland.org.uk/listing/.

Natural England, Magic Map at http://www.magic.gov.uk/magicmap.aspx (includes Priority Habitat Inventory sites).

County level evidence

HC, Highway Design Guide for New Developments, 2006 and Highways Specification for New Developments, 2006 amended 2015.

Preece, N. and Rimmington, N., Herefordshire Historic Farmsteads Characterisation Project Report, Herefordshire Archaeology, 2008.

HC, Landscape Character Assessment, Supplementary Planning Guidance, 2004 updated 2009.

HC, Green Infrastructure Strategy, 2010.

Brooks, A., and Pevsner, N., 2012, The Buildings of England: Herefordshire, Yale University Press, New Haven and London.

A study of the Housing and Support Needs of Older People in Herefordshire, Peter Fletcher Associates and arc4 for Herefordshire Council, 2012.

HC, Herefordshire Ecological Network Map, 2013.

HC, Herefordshire Local Plan, Core Strategy 2011-2031, 2015.

HC, Strategic Housing Land Availability Assessment, Rural Report, 2015 and 2019.

HC, Polytunnels Planning Guide, June 2018.

HC, Sustainable Drainage Systems (SuDS) Handbook, June 2018.

HC, Housing Market Area Needs Assessment, Iceni Projects Limited, July 2021.

Parish and local level evidence

HC, Orcop parish Housing Needs Survey, 2014.

HC, Strategic Environmental Assessment, Orcop Neighbourhood Area Scoping Report, 2017.

AECOM, Site Options and Assessment, June 2019.

Orcop NDP, Evidence base and strategic policies listings, DJN Planning Ltd, January 2020.

Orcop NDP, Questionnaire survey 2020 Results Report and Comment Listings Report, DJN Planning Ltd, April 2020.

Orcop NDP, Housing delivery report, DJN Planning Ltd, September 2020.

HC, Environmental Report and Appropriate Assessment Reports, November 2021 and May 2022.

HC, residential commitments and completions data for Orcop Parish Neighbourhood Area provided in Section 3 of the Authority Monitoring Report July 2021.

APPENDIX B: EXCEPTION CASE

B.1 This exception case has been prepared to explain the approach taken in the draft NDP to the delivery of housing. The NDP makes provision for slightly less than the quantum of housing suggested by the strategic policies. The exception case has been prepared to show that notwithstanding this position the NDP meets the relevant basic conditions:

- it is appropriate to make the plan having regard to national policies and advice contained in guidance issued by the Secretary of State
- the making of the plan will contribute to the achievement of sustainable development
- the making of the plan will be in general conformity with the strategic policies in the development plan for the area (the Herefordshire Local Plan Core Strategy, LPCS).

B.2 The exception case is set out against the two principal strategic policies concerned. These are policy RA1 *Rural housing distribution* and policy RA2 *Housing in settlements outside Hereford and the market towns.* The National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG) are referred to as required.

Policy RA1, Rural housing distribution

The strategic policy

B.3 Policy RA1 takes the minimum 5,300 new dwellings allocated to Herefordshire's rural areas by strategic policy SS2 *Delivering new homes* and distributes it amongst seven rural Housing Market Areas (HMAs). Orcop Neighbourhood Area is in the Ross on Wye rural HMA for which the approximate number of dwellings to be delivered 2011-2031 is 1150. Policy RA1 also sets indicative housing growth targets for each of the rural HMAs. The target for the Ross on Wye rural HMA is 14%. Policy RA1 says that the targets are to

*be used as a **basis** for the production of neighbourhood development plans in the county. **Local evidence and environmental factors** will determine the appropriate scale of development.* (emphasis added)

B.4 This flexible approach gives neighbourhood development plans the opportunity to take account of local detail whilst contributing to the overall proportionate approach to housing delivery. It is pursuant to strategic policy SS2 *Delivering new homes*, whose explanatory text says at paragraph 3.33:

*The **location and level of development** allocated to settlements will be determined through the preparation of a Rural Areas Site Allocations Development Plan Document or Neighbourhood Development Plans*. (emphasis added)

B.5 Good progress has been made in providing new dwellings to meet the requirements of policy RA1. The position at April 2021 for Parish Councils undertaking a neighbourhood plan in the Ross on Wye rural HMA and for all rural HMAs is set out below in Table B1. In short, when

account is taken of dwellings built, granted planning permission and allocated in NDPs, the minimum level of new dwelling provision set by policy RA1 has already been reached, halfway through the plan period.

	Ross on Wye rural HMA	All rural HMAs
Policy RA1 housing distribution	1150	5300
Completions 2011-2021	679	2846
Commitments as at 1 April 2021	743	2573
Site allocations within NDPs at April 2021	170	784
Total delivery (% of RA1 housing distribution)	1592 (138%)	6203 (117%)

Table B1: Housing completions, commitments and NDP allocations in Neighbourhood Areas

Source: Herefordshire Authority Monitoring Report Section 3 July 2021 figure 34.

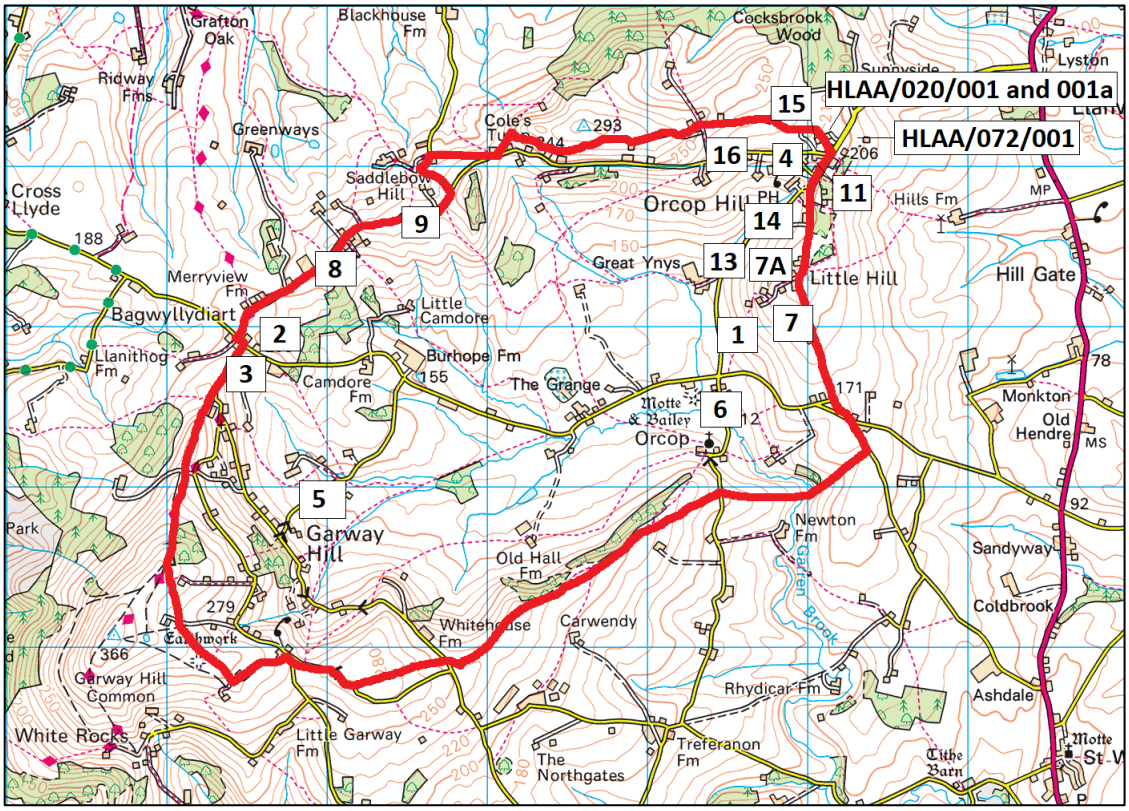
Housing delivery in the draft Orcop NDP

B.6 The indicative housing growth target of 14%, when applied to the Orcop Neighbourhood Area, equates to a requirement for 26 new dwellings over the period of the LPCS. In preparing the NDP significant effort has been expended in investigating how this requirement may be met. A comprehensive site search and assessment has been undertaken and full consideration given to the options for housing delivery that are available. The following paragraphs summarise the work undertaken, with full details available in the referenced reports and minutes of Steering Group meetings.

B.7 Potential housing sites were identified through a Call for Sites in 2018. Sites were also identified by consulting the Strategic Housing Land Availability Assessment (SHLAA), a County-wide assessment of the potential availability of land for housing undertaken by Herefordshire Council. SHLAA surveys in 2015 and 2019 included sites at both Orcop Hill and Orcop.[26]

B.8 The identified sites were then independently assessed by AECOM.[27] Following the completion of this assessment, the Steering Group continued to refine AECOM's conclusions by confirming and adding local detail, including contacting and meeting with landowners and developers, and assessing other sites using the template provided by Locality. Through this work a total of 18 sites were identified. They are to be found at or between Orcop Hill and Orcop, or on the western boundaries of the Neighbourhood Area (Figure B1).

[26] See Herefordshire Council, Strategic Housing Land Availability Assessment, Rural Report, March 2019.
[27] AECOM, Site options and assessment, June 2019.



Orcop Neighbourhood Area

Figure B1: Assessed housing sites in and adjacent to Orcop Neighbourhood Area

NORTH © Crown copyright and database rights (2020) Ordnance Survey (0100059189). Not to scale.

B.9 In 2020, the Steering Group commissioned further work to review and update AECOM's conclusions with a view to exploring options to promote sustainable housing development in the Neighbourhood Area. The resultant Housing Delivery Report[28] set out three options, as follows:

- **Option A** focussed new site allocations to suitable sites in or adjacent to the main built-up area of Orcop Hill in line with LPCS policy RA2 *Housing in settlements outside Hereford and the market towns*; there were no suitable sites identified at Orcop. Option A met the housing requirement although this was dependent on being able to take into account a site on the edge of the settlement which fell partly outside the Neighbourhood Area in neighbouring Much Dewchurch parish. The deliverability of this option would require agreement with the relevant Parish Council.

[28] DJN Planning Ltd, Housing delivery report, September 2020.

- **Option B** proposed a more dispersed spread of development by identifying additional areas of settlement between Orcop Hill and Orcop which had reasonable access to services and facilities. This option met the housing requirement by enabling further site allocations on suitable housing sites in these settlement areas. In drawing up this option, the possibility of allocating identified sites in the west of the Neighbourhood Area at Garway Hill, Saddlebow and Bagwyllydiart was also considered but rejected, as they were too remote to justify departing from the LPCS settlement hierarchy and policy RA3 governing housing in the countryside.
- **Option C** looked at the relationship between the availability of services and recent housing delivery in parishes adjacent to the Neighbourhood Area to see whether the planned distribution of housing could be optimised in the interests of sustainability. The option recognised that Orcop Hill and Orcop were not well-served by key services, and that housing growth over and above proportionate requirements was already taking place at neighbouring settlements adjacent to the Neighbourhood Area with wider and higher-order ranges of services and facilities.

B.10 These three options were discussed at virtual Steering Group meetings in September, November and December 2020.[29] The November meeting was attended by Herefordshire Council officers, after which written advice was provided by Herefordshire Council on the conformity of the three options with the LPCS. This advised that option C may be justifiable if Options A and B were shown to be undeliverable and that every attempt had been made to achieve the Orcop housing requirement within the Neighbourhood Area.

B.11 The Steering Group has concluded that Options A and B are not deliverable options, for the following reasons:

- **Option A** depends on being able to take into account potential capacity of eight dwellings on a site which, whilst adjacent to Orcop Hill, is mainly in Much Dewchurch parish and outside the Neighbourhood Area. Much Dewchurch Parish Council has previously opposed the development of the site. In addition, such development would not be suitable as it would unduly extend the built form of Orcop Hill into open countryside to the detriment of the nucleated form of the settlement and to its setting. Other elements of housing delivery identified in option A have been taken forward into the draft NDP.[30]
- In respect of **Option B,** the proposed settlement boundary at Little Hill is too elevated and conspicuous in the landscape, being set above the valley. There is too much scope for future windfall development in the areas identified, risking the creation of an over-developed Orcop Hill 'suburb' contrary to the open countryside character of the area

[29] Notes of these meetings are available at Orcop Parish Council Neighbourhood Development Plan – Orcop Parish Council.
[30] Site allocation (land west of Birch View, Orcop Hill), specification of dwellings in scope of LPCS policy RA3, and windfall allowance.

which should be protected, and potentially leading to the undesirable coalescence of the settlement areas in the future.

Basic conditions assessment for policy RA1

B.12 The outcome of the work reported above is that the draft NDP demonstrates delivery of 22 new dwellings against the target of 26.

B.13 Notwithstanding this minor numerical shortfall, this position is considered to be in general conformity with policy RA1. This is because policy RA1 does not take a prescriptive approach to housing delivery in neighbourhood plans. The housing growth target is described as "indicative". Policy RA1 also makes due allowance for local evidence and environmental factors in determining the appropriate scale of development. As explained above, in preparing the draft NDP such evidence and factors have been carefully investigated and the results of this work demonstrably underpin the proposed approach. Options to deliver the indicative housing growth target have been thoroughly explored and found wanting. Determining local factors include a lack of suitable and available sites within or adjacent to Orcop Hill and Orcop, a dispersed settlement pattern, the limited capacity of the rural road network to accommodate development, and other infrastructure issues such as the provision of foul drainage. The net result of these local conditions is that the indicative housing growth target cannot be shown to be met, despite the fact that the draft NDP includes a site allocation at Orcop Hill, recognises other potential in the countryside, and incorporates a realistic windfall allowance.

B.14 PPG[31] explains what is meant by 'general conformity', advising that when considering whether a policy is in general conformity a qualifying body, independent examiner, or local planning authority, should consider four criteria. These are set out below in bold, with commentary as to how the Orcop NDP meets each test in respect of policy RA1:

- **whether the neighbourhood plan policy or development proposal supports and upholds the general principle that the strategic policy is concerned with:** as explained above, policy RA1 seeks to deliver proportional growth principally via NDPs whilst avoiding an over-prescriptive approach. The draft Orcop NDP meets this test, because the indicative housing growth target has been used as a basis for its housing delivery policies which have also had regard to local evidence and environmental factors in determining the appropriate scale of development for the Neighbourhood Area.

- **the degree, if any, of conflict between the draft neighbourhood plan policy or development proposal and the strategic policy:** the shortfall in housing delivery in numerical terms is just four dwellings, or 0.35% of the strategic policy provision of 1150 dwellings to the rural HMA. Completions, commitments and allocations in the rural areas generally and in the Ross on Wye rural HMA already exceed the policy RA1 requirements (Table B1). There is no conflict in qualitative terms, since the NDP

[31] PPG Paragraph: 074 Reference ID: 41-074-20140306.

upholds the principle of proportional growth tempered by local evidence and environmental factors.

- **whether the draft neighbourhood plan policy or development proposal provides an additional level of detail and/or a distinct local approach to that set out in the strategic policy without undermining that policy:** the draft Orcop NDP does not undermine policy RA1 and does not seek to take a distinct local approach to housing delivery. It does provide an appropriate and additional level of detail to justify the approach taken to housing delivery, which is itself consistent with the strategic policy in its use of local evidence.

- **the rationale for the approach taken in the draft neighbourhood plan or Order and the evidence to justify that approach:** the evidence base for the draft Orcop NDP sets out the rationale and justifying evidence for the approach taken, as explained above.

B.15 National planning policy requires that *neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies*.[32] Although there is a minor numerical shortfall in the quantum of housing to be delivered through the draft Orcop NDP when assessed against the indicative housing growth target, this is not considered to amount to the promotion of less development or to undermine policy RA1. The strategic policy expressly allows NDPs to take account of local evidence and environmental factors in determining the appropriate scale of development, an approach which has been exhaustively pursued in preparing the draft Orcop NDP. It is clear that the outcome of this work will not hinder or undermine achieving the strategic policy in terms of housing delivery, since progress in the rural areas generally and in the Ross on Wye rural HMA in particular already exceeds the requirements of policy RA1 (Table B1).

Policy RA2, Housing in settlements outside Hereford and the market towns

The strategic policy

B.16 Policy RA2 seeks to maintain and strengthen locally sustainable communities in the rural parts of Herefordshire by supporting sustainable housing growth in or adjacent to 119 named settlements, selected on the basis of their size and services offered and including Orcop Hill and Orcop. The policy says this approach will

enable development that has the ability to bolster existing service provision, improve facilities and infrastructure and meet the needs of the communities concerned.

B.17 The policy continues

[32] NPPF paragraph 29.

The minimum growth target in each rural Housing Market Area will be used to inform the level of housing development to be delivered in the various settlements set out in Figures 4.14 and 4.15. Neighbourhood Development Plans will allocate land for new housing or otherwise demonstrate delivery to provide levels of housing to meet the various targets, by indicating levels of suitable and available capacity.

B.18 The explanatory text says

The proportional growth target within policy RA1 will provide the basis for the minimum level of new housing that will be accommodated in each neighbourhood development plan. The target represents a level of growth for parishes, as a percentage, that is proportionate to existing HMA characteristics. The main focus for development will be within or adjacent to existing settlements indicated within fig 4.14 and 4.15. In parishes which have more than one settlement listed in Figure 4.14 and 4.15 the relevant neighbourhood development plan will have appropriate flexibility to apportion the minimum housing requirement between the settlements concerned. This will allow for a locally flexible approach that will respect settlement characteristics, the distribution of local facilities and other local factors.

B.19 Overall, policy RA2 and the stated manner of its implementation through NDPs confirms the strategic intention, noted above in the context of policy RA1, to avoid an overly-prescriptive approach to housing delivery in rural areas. Instead, local evidence and environmental factors are to be taken into account in any given case in setting an appropriate scale of development. This flexibility is in the interests of sustainability, particularly in supporting local facilities and services.

Sustainable housing growth in the draft Orcop NDP

B.20 Whilst the focus so far in this exception case has been on the limitations posed by local conditions on the deliverability of new housing in the Neighbourhood Area, the approach set out in the draft NDP also has positive implications for achieving sustainable development. This turns on the distribution of services and facilities in neighbouring parishes, and on the pattern of housing delivery achieved to date in these areas.

B.21 The availability of local services and facilities in Orcop and adjoining parishes is show in Table B2 and Figure B2, using a scoring system employed by Herefordshire Council which gives points for services and public transport provision.[33] Orcop Hill and Orcop are relatively poorly-served and in particular have no school, shop or post office – key day-to-day services.

[33] Herefordshire Council, Rural Settlement Hierarchy Background Paper, July 2010.

Parish	CS settlements	Key services						
		Public transport	Pub	Village/parish hall	School	Shop	Post Office	TOTAL
Orcop	Orcop Hill	1	3					4
	Orcop*			3				3
Kilpeck	Kilpeck	1	3	3			1	8
	Wormbridge	3				3		6
	Didley	3						3
Much Dewchurch	Much Dewchurch	3	3	3	3			12
Llanwarne	Llanwarne	3		3				6
St Weonards	St Weonards	3		3	3	3	3	15
Garway	Garway	3	3	3	3		1	13
	Broad Oak	3				3		6

* Orcop Parish Hall is ascribed here to Orcop settlement for completeness, though it is in fact in a remote rural location away from areas of settlement.

Table B2: Key services and facilities, Orcop and surrounding parishes

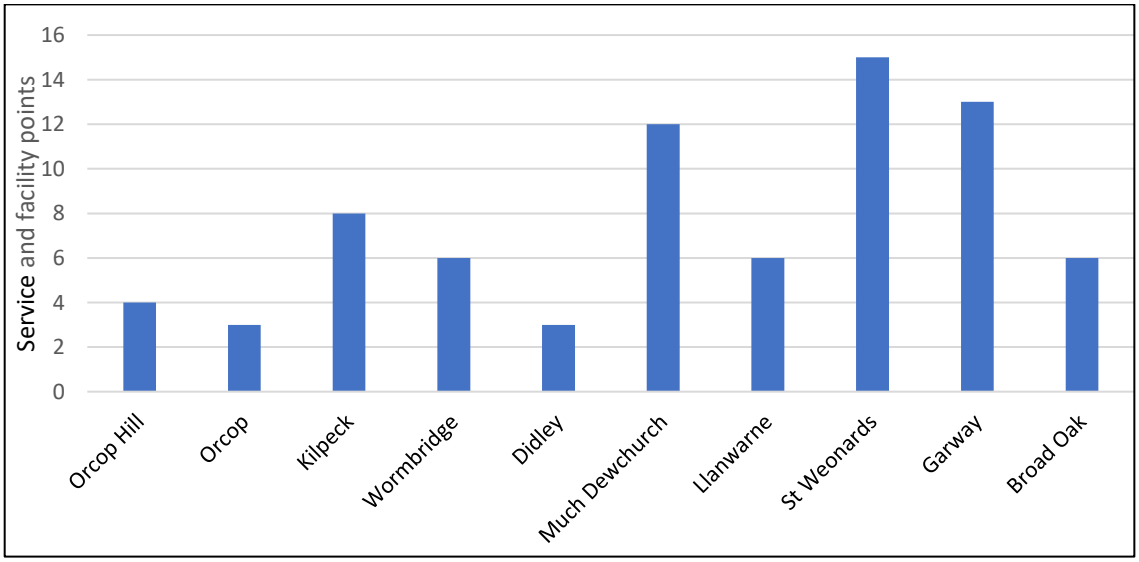


Figure B2: Key services and facilities, Orcop and surrounding parishes

B.22 The position on housing delivery in Orcop and adjoining parishes is shown in Table B3 and Figure B3. Of the six parishes, three have exceeded their growth targets, to the extent that across the group as a whole the amount of new housing coming forward exceeds the growth target. This echoes the Ross on Wye rural HMA position reported in Table B1.

Parish	Growth target	Delivery*	Residual**
Orcop	26	9	-17
Kilpeck	23	7	-16
Much Dewchurch	40	30	-10
Llanwarne	22	26	4
St Weonards	22	66	44
Garway	25	45	20
Total	158	183	25

* completions, commitments and NDP site allocations at 1 April 2021

** a minus figure means still to find to meet the growth target

Table B3: Housing delivery in Orcop Neighbourhood Area and neighbouring parishes

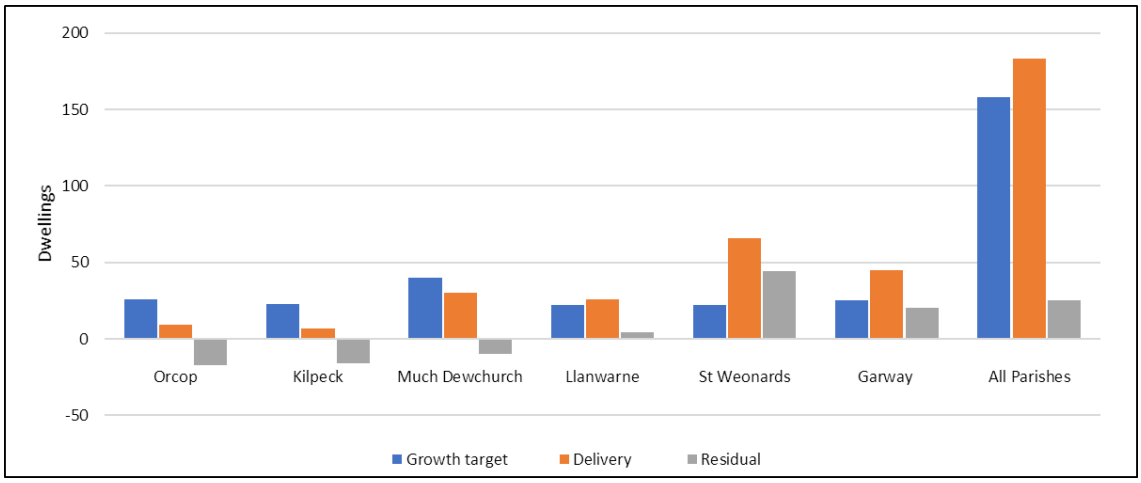


Figure B3: Housing delivery in Orcop Neighbourhood Area and neighbouring parishes

Source: Herefordshire Authority Monitoring Report Section 3 July 2021 figure 34.

B.23 Comparing the distribution of key services and facilities and of new housing in Orcop and neighbouring parishes shows that housing delivery has been taking place most readily in parishes such as St Weonards and Garway which contain settlements which have the widest range of services and facilities on offer locally.

B.24 A further basis for the exception case therefore is that a minor shortfall on new housing provision at Orcop Hill and Orcop is justifiable because it reflects the local pattern of service provision and promotes sustainability. This has no implications for additional growth in

neighbouring settlements given the scale of delivery already achieved, committed or allocated in the parishes concerned and across the rural HMA. It would promote sustainability by avoiding planning for increases in travel from Orcop Hill and Orcop to settlements outside the Neighbourhood Area which have wider and higher-order ranges of services and facilities. These are journeys which inevitably will favour use of the private car over more sustainable modes of transport such as walking, cycling or public transport. These modes are not practicable in the local context as a means of accessing day-to-day services.

Basic conditions assessment for policy RA2

B.25 This approach is considered to be in general conformity with policy RA2. The aim of policy RA2 is to achieve sustainable housing growth through proportionate development which (amongst other things) has the ability to bolster existing service provision. Though Orcop Hill and Orcop feature in the RA2 settlement lists, the Neighbourhood Area has a dispersed settlement pattern and a comparatively low level of existing services. The ability of new development in these settlements to bolster existing service provision is as a result limited. If the location of development is to be influenced by levels of existing services in settlements (which is part of the rationale for inclusion in the RA2 settlement lists) there is a case to take account of this distribution when applying the indicative housing growth target to *inform* the level of housing development in settlements. The explanatory text to policy RA2 explains at paragraph 4.8.21 the need for flexibility in apportioning new housing in accord with settlement characteristics, the distribution of local facilities and other local factors, and although this is envisaged to be within Neighbourhood Areas there is no reason why this principle cannot be applied across Neighbourhood Areas if in this way a more sustainable outcome can be shown to be delivered.

B.26 Considering how the draft Orcop NDP meets each of the criteria identified in PPG[34] for the assessment of general conformity in respect of policy RA2:

- **whether the neighbourhood plan policy or development proposal supports and upholds the general principle that the strategic policy is concerned with:** whilst the approach set out here would diverge from a strict application of the numerical proportionate approach to the distribution of growth, it is also informed by local factors which suggest that in this way sustainable housing growth will be more likely to be achieved.

- **the degree, if any, of conflict between the draft neighbourhood plan policy or development proposal and the strategic policy:** as noted above in the context of policy RA1, the shortfall in housing delivery in numerical terms is just four dwellings, or 0.35% of the strategic policy provision of 1150 dwellings to the rural HMA.

- **whether the draft neighbourhood plan policy or development proposal provides an additional level of detail and/or a distinct local approach to that set out in the**

[34] PPG Paragraph: 074 Reference ID: 41-074-20140306.

strategic policy without undermining that policy: the evidence base for the draft Orcop NDP sets out the rationale and justifying evidence for the approach taken, as explained above.

- **the rationale for the approach taken in the draft neighbourhood plan or Order and the evidence to justify that approach**: the evidence base for the draft Orcop NDP sets out the rationale and justifying evidence for the approach taken, as explained above.

B.27 The draft NDP is in accord with the national planning policy that

To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.[35]

B.28 The draft NDP has sought to locate development at Orcop Hill and Orcop, the settlements identified in strategic policy. However, because of local factors new housing in these settlements will not, in itself, support local services. The suggestion that development in one village may support services elsewhere can only be achieved in the local context at the expense of increasing reliance on using the private car to travel to access such services, having regard to the distances involved.

Conclusions

B.29 The approach to housing delivery in the draft Orcop NDP has been prepared in accordance with national policies and guidance and LPCS strategic policies. The indicative housing growth target set by policy RA1 has been used as a basis, with local evidence and environmental factors then determining the appropriate scale of development. The suitable and available capacity of land for new housing at the two identified settlements, Orcop Hill and Orcop, has been thoroughly investigated. Making due allowance for completions, commitments, rural sites and future windfalls, the net result is a minor numerical shortfall on the proportionate growth target for the Neighbourhood Area. Across the rural HMA this is not significant because planned levels of growth have already been achieved, committed and allocated, so that the NDP does not undermine the strategic approach or promote less development. Considering the shortfall in terms of the availability of key services, it is apparent that it will not hinder the promotion of sustainable development. Both Orcop Hill and Orcop lack key day-to-day services. Locating development here will not support local services but will necessitate additional car-based journeys further afield.

B.30 For these reasons, the NDP meets the basic conditions identified in paragraph B.1:

[35] NPPF paragraph 79.

- it is appropriate to make the plan having regard to national policies and advice contained in guidance issued by the Secretary of State
- the making of the plan will contribute to the achievement of sustainable development
- the making of the plan will be in general conformity with the strategic policies in the development plan for the area.