

**Lyonshall Neighbourhood Development Plan
Schedules of Representations in response to
Informal consultation on Draft Plan, July 2018.**

Respondent ID	Agree with Plan	Section/ Policy Number	Response Type	Comment	Proposed Change
1. Resident	No		General	<p>Firstly, I do not understand why when two members of the NDP are no longer able to be on the committee no other villagers are able to give their thoughts on the areas where they live.</p> <p>Secondly, the draft is far too long to be digested by most people because they would not have the time to spend on it. No way could anybody stand in any of the 4 places and be able to read it and make notes to reply or print the 43 pages from their computer and again having to spend a lot of time reading and making sense of it.</p> <p>A much shorter draft document is required with bullet points on the various sites you are thinking of allowing houses on and the types of house/bungalows and sent to each household in Lyonshall as previous.</p> <p>Why have you given the 5 houses (3 of which are already built) the name of Burnt Orchard when it is called White Lion Meadow? You have already agreed that 68 houses can be built or are built, but I cannot see how in such a small village of only 300 houses another 43 can be sustained making 411 in all. If any do get agreed you should be thinking of the elderly and the young.</p>	<p>No change: Reported to PC. The loss of two members occurred after completion and analysis of the Issues and Options exercise: the creative work was done.</p> <p>Note: As was clearly stated anyone wishing a hard copy could have one.</p> <p>This is a short NDP</p> <p>Change :Typing error -to be corrected</p> <p>No change: The final consultation supported the numbers in this draft.</p>
2. Resident	Yes		General	I have great admiration for all those who have contributed thus far and who have, in great detail and due consideration of all comments made in meetings/responses etc., brought forward such a splendid presentation of village thinking, needs and future possibilities.	No change: Thank you.
3. Resident	Yes		General	There appears to be no consideration given to the provision of sheltered housing from the parish. Considering the current age profile of the parish, in 30 years' time this is likely to be an issue. Although people say they want to stay in their own homes this is not always possible, and many people do not realise how disabling some illnesses are. A group of 8-10 self-contained warden-controlled flatlets would enable people to live out their days, if not in their own homes, then a least in their own village. I suggest the land	No change: There is adequate development space to accommodate this, should it be viable for developers. PC encourages but cannot compel. It would be more appropriate in

				next to the village hall would be a suitable site - run by affordable housing association, not private.	Kington where there are better facilities and medical services.
4. Local organisation		LB4		I started a community energy company in the area in 2012 and have been trying to create projects ever since. I'm currently a member of 7 projects and a voluntary director of Herefordshire longest that also supplies local business. I am experienced with renewable energy systems and if any free advice is needed please get in touch.	No change: Thank you.
5. Resident	No	All		I disagree with proposals on one point only, and the construction of <u>one</u> new storm drain to ensure the future security of all 30 houses between the George and Curl Brook Bridge would remove my objection to the proposals, with the landowner effected receiving any compensation needed by those proposing future developments. The current surface drainage layout basically dates from 1791 and is sufficient for the number of houses hard standing they exist now. Having written to many local bodies, I have a letter from Herefordshire Councils engineer to say that given the permissions for building already granted, the village centre will not flood. In my personal opinion, should further suggested building be granted permission, flooding will occur.	No change: Note: general agreement with plan except of this point which is covered in detail in policy LH1.6
6. Resident	No			Very disappointed that the field opposite the close is up for development - it has already been shown that there are important archaeological remains existing and this was supposed to be a local nature reserve start up - How can these things be swept aside?	No change: NDP cannot influence a site where outline planning has already been granted. Such matters are dealt with through the development management process at Herefordshire Council.
7. Resident	Yes			no comments	
8. Resident	Yes			Congratulations to the committee involved!	Thank you.
9. Resident	Yes, Generally, agree	LB3		No more broiler units or other intensive livestock units should be permitted in the parish - the nuisance from smells is too great.	No change: The advice received is that policy LB3 is

					sufficiently robust to discourage further units.
		LE1		In conjunction with LB3 - the development of further large agricultural buildings will be detrimental to the local landscape and character and therefore should not be permitted.	Change: LE1. After “demonstrate”, insert “in the design and access statement” to reinforce further LB3.
10. Resident	Yes, Generally, agree	LB3		No more broiler units or other intensive livestock units should be permitted in the parish - the nuisance from smells is too great.	No change: The advice received is that policy LB3 is sufficiently robust to discourage further units.
		LE1		In conjunction with LB3 - the development of further large agricultural buildings will be detrimental to the local landscape and character and therefore should not be permitted.	Change: LE1. After “demonstrate”, insert “in the design and access statement” to reinforce further LB3.
11. Resident	No	LH3 para6		‘Imaginative modern designs’ should not be encouraged. They tend to end up looking ugly, and in any event are out of place in the traditional and rural west of Herefordshire that we are trying to protect.	No change: Noted
		LB3		A maximum number of Broiler Houses should be declared beyond which no further will be approved over the NDP duration. Great public support would be received for this decision.	Change: Amend LB3 policy title to “Large Agricultural buildings and extensions to them” to strengthen LB3.
		3.1.15 Map 5		Holme Marsh has already had its share of new development for virtually all of the period covered by the NDP (and Herefordshire Core Strategy); it is essentially complete. The settlement boundary for Holme Marsh should therefore not be enlarged. This will only make possible further house building gradually destroying the character of Holme Marsh (the three Planning Applications recently approved already represent a loss of valuable open space). If the settlement boundary is not increased then there will be no new land upon which to build, and the majority of the residents of Holme Marsh would be very pleased. Many of our older residents like Holme Marsh the way it is, and the newer residents have, of course, come here <u>because</u> of the way it is. continued. As far as ‘localism’	No change: Majority approval after consultation on settlement boundaries. Proposed boundary offers little or no further development.

				is concerned we expect our local parish council to actively support the views of their electors, in the area of the parish concerned.	
			General	In a broader context instead of raining down potential development on the county much to the annoyance of many people Herefordshire Council should perhaps consider the creation of one, or more, new towns which would satisfy those who live in them, and those who don't.	No change: Noted - beyond the power of the NDP.
12. Resident	Yes	3.1.21 (also in App 4)		The quote below paints an unfair picture as the vacant affordable homes were insufficiently advertised within the parish. There should be greater publicity within the parish. Any of the housing associations should advertise vacancies via the clerk, the website including news items and the noticeboard. The 3 vacancies quoted were not targeted within the parish. The need for affordable homes was recognised by 45% of respondents and was the most supported type of housing. It is worth noting, however, that the last 3 vacancies in the existing affordable housing stock attracted no Lyonshall residents, and had to be filled from outside the Parish [see Appendix 4]	No change: Every person wanting an affordable home should be registered with Home point where vacant homes are advertised. In addition, PC advertise vacancies locally when alerted.
13. Resident	No	1.2.1/1.3.2/1 .3.4/2.3.1/3. 1.11/3.1.18 - 3.1.20/3.1.23 and more		" Terminological in exactitudes" For example " All of appendix 1"	No change
		all: evidence bases & 1.2.2/1.3.1/1 .3.5/3.2.2/3. 3.8/3.3.10 and more		" Economy with the truth"	No change
		Whole Document		This may be considered a " Dodgy Dossier"	No change
			General	This needs to be proof-read, reconsidered and then completely redrafted - greatly reduced in size.	No change: All the policies satisfy and reflect the

					majority views of the parish after consultation as required in law.
14. Residents	No	3.1.18 Map3 & 3.1.14 Map 4		Settlement boundary change to include land opposite the Memorial Hall.	Addition: Provision for two houses included in the plan
			General	Congratulations on producing such a clear and well written plan overall- A huge amount of work.	Thank you.
15. Resident		3.1.3/3.1.4/3.1.8/3.1.9		Total numbers of new houses (committed) and new homes (Proposed) = 111. Far too many! Evidence base implied in 3.1.9 is far too small to be statistically valid.	
		1.3.1		"...around 200 responses" (to July 2017 consultation). From whom? Only 93 on "issues & options presentation results" - see above	Change: Correct to almost 100 responses
		3.1		No local demand for housing. No incentives to encourage <u>anyone</u> to Lyonshall given, i.e. no thought as to who might live in in 111 houses	
			General	<p>Introduction</p> <p>Previous documents have suggested that the latest Lyonshall NDP proposal should be "short and clear" in order to speed its processing by Hereford CC and hence its implementation. Sadly it is neither of those! It consists of 44 pages, mostly of small print, and this does not include the evidence bases for some of the claims made. There are also inconsistencies within the document.</p> <p>Note that while reading this draft I have also referred back to previous documents, especially (but not exclusively) the Analysis of Questionnaires drawn up by Lyonshall NDP in September 2013, the NDP Housing Survey of February 2017, the NDP Public Consultation Document ("Issues and Options") of July 2017, NDP Minutes and relevant parts of the Herefordshire Core Strategy.</p> <p>I do not think many residents of Lyonshall will have either the time or the inclination to give this "First Draft Plan" the painstaking assessment it needs -- it cannot and <u>should not</u> be skimmed. (It has taken me around 30 hours to fully take in its content and implications. My concern has</p>	

			<p>been for whether this document “stands up to scrutiny”, not simply whether or not I personally agree with the policies proposed.)</p> <p>Of course, the longer the document and the more abstruse, the fewer people will even try to read it. There is also an inevitable “law of diminishing returns”; there will be fewer participants in every successive public consultation as people become bored with the issues and feel that their views have been sufficiently expressed and/or ignored. I have no doubt Hereford Planning Officers will raise many questions regarding the final NDP’s validity.</p> <p>Issues</p> <p>The main issues on “scrutiny” fall into 5 categories:</p> <ul style="list-style-type: none"> • Time period covered by the NDP • Total housing numbers • Legitimacy of evidence base • Legitimacy of NDP process to date • Inconsistencies within the Draft <p>Time Period</p> <p>All NDPs should cover the period 2011 – 2031. This 20-year period was the basis of the early work on the Lyonshall NDP in 2012 which was stopped in 2014. It is also quoted on the title of the July 2017 “<i>Issues and Options</i>” document. This “<i>First Draft Plan</i>”, however, uses the period 2018 – 2031 on its cover, while making reference in the text to housing in Lyonshall built or already in receipt of planning permission during the 7 years from 2011 to the present. This is very confusing and has many implications. We cannot undo the activity of the last 7 years (30% of the plan period) but neither can we ignore the major relevance of that period to the development of Lyonshall, particularly in the light of “<i>presumption in favour of development</i>” until the NDP is approved and registered with Hereford CC, now estimated at 2019. We must not pick-and-mix about which years are relevant and which are not. This needs to be addressed.</p> <p>Total Housing Numbers</p>	<p>Change: to 2018 to see if accepted - The plan period is from 2011-2031 however, Herefordshire Council prefer to see the start date looking forward from approved plan start date ie 2018.</p>
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			<p>First, a small but important point; it has been said more than once that the 2012-14 NDP Steering Group `recommended', `endorsed' or `preferred' a growth rate of 2 new houses per annum during the 2011 – 2031 period, of which 8 (The Fishpools affordable housing) were already scheduled. <u>This is not true;</u> we were informed by the Parish Council that under the then-prevailing terms of Herefordshire Council strategy this was the maximum number of new-builds Lyonshall would be allowed to have in the period and that it was non-negotiable; all we could do was advise where those 40 new homes could be built. Hence optimum housing numbers didn't feature heavily in our surveys and plans!</p> <p>Second, a "spanner was thrown in the works" by Mr. Hern when he explained that he wanted to build between 15 and 45 houses on his own land to help finance his purchase of the Royal George. He quite rightly put this issue to the people of Lyonshall in 2014/2015 at two or more well-attended public meetings; the proposal for the initial 15 was approved by over 70% of the audiences; the proposals for the remaining 30 received qualified approval. (I believe I am right in saying that his plans were endorsed by Hereford Council within days of Hereford's adoption of its new Core Strategy in October 2015 which effectively abolished the "2 per annum new builds" plan for Lyonshall)</p> <p>Regrettably, since then other would-be developers have seized on "presumption in favour of development" (the Herefordshire Council policy that prevailed in the absence of an NDP) so that, according to Key Issue 1 in the "Issues and Options" document of July 2017, "a total of 68 houses are already committed for the plan period". This obviously includes Fishpools 8 and presumably the 30 (of Mr Hern's) mentioned in the same paragraph. The July 2017 consultation document doesn't specify where the remaining 30 are planned, but some of these (Holme Marsh, Burnt Orchard, Opposite the Close) can be assumed from the 2018 Final Draft Appendix 1)</p> <p>Frankly, I am not at all confident that all the respondents to THIS document will have registered the fact that the Parish is already</p>	Noted
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			<p>committed to 68 new houses “whether we like it or not”, before we start considering any more.</p> <p>Key Issue 1 in the July <i>2017 Issues and Options Consultation</i> document quotes the Herefordshire Core Strategy as giving an “indicative growth rate for Lyonshall” of 36 houses to be built between 2011 and 2031. This is NOT, as I understand from the Core Strategy, a “minimum”; the scoping document states “proportional growth of up to 12% (of existing housing stock in 2011 – then approximately 300 in Lyonshall) as being sustainable”. So by July 2017 Lyonshall was already committed to nearly double the number of new houses which Hereford believes to be viable! Of course, Hereford CC may be wrong. (When I raised this last year I was told that Hereford’s planners “would not have approved” 68 new houses if 36 was, in effect, the sustainable limit up to 2031 but I believe “<i>presumption in favour of development</i>” would not have allowed them to turn down applications on these grounds!)</p> <p>Key Issue 2 in that document asks whether or not the people of Lyonshall will endorse development on 4 other sites which, under the July 2017 proposals, could add another 53 homes to the total. Response to this was marginally in favour (albeit from a small number of respondents) so these appear on the <i>2018 First Draft</i>, although numbers on 2 of the 4 sites have been modified slightly (Draft Plan 3.1.11) to reduce the total to 43.</p> <p>To summarise Housing in Lyonshall 2011 – 2031:</p> <ul style="list-style-type: none"> ▪ Existing Housing Stock in 2011 = 300 ▪ Additional Housing Built 2011 to 2017 = 12 (inc. 8 Fishpools) ▪ Already having Planning Permission by July 2017 = 56 (presumed here to include 30 for Mr Hern and 8 at Holme Marsh; remainder not specified) ▪ Total as at July 2017 = 368 ▪ Additional Housing Proposed in First Draft of NDP, July 2018 = 43 ▪ Total if July 2018 additions in NDP approved = 411. ▪ Also affecting possible total numbers is a note in the small print of the <i>Draft Appendix 4</i> that in the event of a future demand for 	<p>Noted</p>
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			<p>more “affordable housing” (none scheduled at present) this will be “met by exception sites”.</p> <ul style="list-style-type: none"> ▪ The total could rise even more if “a local parishioner” receives approval for development of an unspecified number of houses at Regulation 14 (<i>see NDP Minutes of March 5, 2018 - not mentioned in the First Draft</i>). ▪ An extra 111 homes (July 2018) represents a 37% increase in housing stock; this is 3 times the sustainable number suggested in the Hereford Council Core Strategy Scoping document. I wonder whether those reading the NDP First Draft will realise the enormity of this proposed increase in housing; it should be summarised as above for them. <i>For the record, when I mentioned to a long-standing resident of Lyonshall yesterday that the First Draft specified an additional 111 homes for the village she was horrified! She is not a “NIMBY” and remains fully supportive of Mr. Hern’s proposed 45 new houses but not of another 66!</i> ▪ Note also that the Housing Survey, conducted in February 2017 (<i>but with results only recently available through the NDP despite repeated requests</i>), indicates that there is at present no demand for housing of any kind in Lyonshall – see “Evidence Base” below. <p>Legitimacy of Evidence Bases I have not established whether or not there is a “quorum” for response to NDP surveys. If not, there should be! I would suggest 45% of the electorate or 45% of households in the NDP area, whichever is the preferred unit of measurement in context, with some allowance for children or businesses where relevant. Response rates significantly below 40% may have some advisory value but should be treated with caution and not used to determine policy.</p> <p>In 2011 the adult population of Lyonshall, <i>excluding residents of Lynhales Nursing Home</i>, was approximately 500; the number of households was</p>	<p>Noted</p> <p>The NDP process follows and complies with the requirements set out by</p>
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			<p>compared with the 26 people who voted against but enough to build a case for development???</p> <ul style="list-style-type: none"> • Moreover, we don't know who the 93 respondents to the July 2017 survey are. They may or may not be Lyonshall residents and may or may not have a vested interest. <p>It is arguable that any "evidence base" is better than none, but that is a very risky belief and one that should be avoided in any "official" document! This <i>First Draft</i> is studded with claims for which there is no evidence at all and assertions which present as fact what are merely opinions. If claims and assertions cannot be corroborated as proven "facts", with quoted independent sources, they should be either omitted or qualified. (For example statements are made about the reasons for the closure of The Royal George and the local farm shop which are at best half-truths.)</p> <p>Conversely, the response to adequately-answered surveys should not be ignored if it fails to conform to the user's prior opinion, nor should it be manipulated to suit the user's objectives:</p> <ul style="list-style-type: none"> • Reference Appendix 4 of the <i>First Draft</i> regarding the February 2017 Housing Survey, the NDP Steering Group "<i>didn't feel the housing results were as useful as hoped for and failed to give a steer for the majority of the population because over half the respondents lived in the centre of the village and are over 65, with over 2/3 of respondents wanting to stay in their own home.</i>" This survey should not be discounted because the respondents don't exactly match the village profile or follow the pattern of Kington Rural (3.1.18 – 3.1.20). Lyonshall has a disproportionately large older population, even for this area. It also has a disproportionately large number of people living in "the village centre". This response is indicative of how Lyonshall IS, not how the NDP Steering Group/Parish Council might like it to be! • Reference the September 2013 survey, the two key requirements evidenced in that survey were for a) the reopening of The Royal George (63% strongly in favour, a further 29% in favour) and b) maintaining bus routes (64% strongly in favour, a further 30% in 	<p>Responses have been recorded and identified.</p>
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				<p>favour). Only 34% were strongly in favour of “The Village Centre Concept” yet the plan put forward then (and referenced in subsequent “plans”) suggests that this was the major demand of the respondents and proposed grandiose and unrealistic schemes, including moving the Memorial Hall which is not within the Parish Council’s remit (see Paragraph 5 of the “Background” page of the First Draft).</p> <p>Survey and statistical evidence should be proportionate to the importance of the question Very small respondent numbers are dangerous, whether or not hundreds of people had the opportunity to respond but didn’t take it; and a careful distinction should be made between evidence and opinion.</p> <p>Legitimacy of NDP process to date As I understand it, an NDP Steering Group should be an independent voluntary group of people living or working in the relevant area, responsible for obtaining the opinions of the rest of the area population on future development (not confined to Housing) and for drawing up proposals which are then put to the Parish (or Town) Council for vetting to ensure conformity to wider policies e.g. the Herefordshire Core Strategy and approval. Its meetings should be open to the public and minuted. There is no requirement for any Councillor to serve on an NDP Steering Group and those who do so are there simply as individuals, not in an official capacity.</p> <p>The above was the situation prevailing in Lyonshall when the first NDP Steering Group was formed in 2012. Its Neighbourhood Plan was close to presentation to Herefordshire Council in 2014 when it was stopped by the Parish Council pending revision of the Herefordshire Core Strategy which has a particular bearing on housing matters.</p> <p>The new Herefordshire Core Strategy was eventually adopted in October 2015. It was decided by the Parish Council, in the light of this and other developments, that a new NDP was necessary. The previous NDP Steering Group was not asked to reconvene. Instead a new Steering Group was</p>	<p>All Meetings followed procedure with agendas and</p>
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			<p>formed over a year later (November 2016) by the Chairman of the Parish Council consisting of 1) himself as Chairman of the NDP Steering Group, 2) a fellow-Councillor and 3) the Clerk to the Council in her official capacity and 4) co-opting 3 other Lyonshall residents, only one of whom had served on the NDP Steering Group four years earlier. No public call for volunteers was made, to the best of my recollection, and meetings were held in private.</p> <p>Minutes of all the meetings of this second Steering Group were available on the Lyonshall website up to and including October 2017, when a break was declared while consultants worked on the project. Early in 2018 the most experienced of the independent Steering Group members sadly died, another independent member seems to have played no further part in the NDP steering group (for reasons unknown) and the second Councillor resigned, thus leaving a depleted Steering Group comprising the Chairman, one other person and the Parish Clerk. This small group has met on 4 occasions in 2018 and minutes have recently been posted on the website. No reference is made in Section 4 of the First Draft (Next Steps) to referring this plan to the Parish Council again following this Informal Consultation. I assume that since the Chairman of the Steering Group and the Chairman of the Parish Council are one-and-the-same person it may be thought “tautologous”! As our Parish Council is unelected, the councillors may not feel empowered to comment.</p> <p>I am really not sure about the legitimacy of the Lyonshall NDP process in recent months and believe it needs to be independently validated, if only to ensure there are no repercussions in the future.</p>	<p>minutes published in to the legal guidelines.</p> <p>Minute reference 160/17- Parish Council advised of depleted Steering group and decided to keep the focus on completing the plan. As main body of work and preparation of the plan had been completed by the whole group through the issues and options there was only a need to cross check and verify to the evidence base, which could be completed by reduced numbers with the support of consultants. The public have had the opportunity to be involved throughout the process.</p> <p>Process followed correctly.</p>
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			<p>Inconsistencies within the Draft</p> <p>Listed below are some of the inconsistencies and misleading statements in the <i>First Draft</i> – this list is not comprehensive. They are not all particularly important but lessen the readability of the document, raise doubts and could expose the Plan to legal challenge. For ease of compilation they are listed in the order in which they occur in the document.</p> <ol style="list-style-type: none"> 1. Front Cover – reference to 2018 as start date. See “Time Period” above. 2. Contents – page nos. given but none given in the body of the document! Appendix 4 not listed. 3. Background – some remarks seriously misleading and confuse fact with opinion. See “Evidence Bases” above. Likewise with regard to 3 and 4 on the following page. 4. Lyonshall Policies - LH2 – This suggests that new housing developments will “meet local need”. There IS NO “local need” as stated later in this document! (The NDP should be creating demand, not trying to respond to a demand that doesn’t exist!) 5. Policy LC1 Memorial Hall - The Parish Council does not have any authority regarding the management of the Memorial Hall and the site on which it is built. <i>(The site was given to a Charitable Trust in the 1920s, the building was built and is still run by that Trust. How it is used, maintained or developed by that Trust is a matter for the trustees and the Charities Commission.)</i> All statements which suggest that the Parish Council will determine what happens to the Memorial Hall should be omitted. 6. Introduction: 1.2.1 This needs to be carefully re-phrased to make it clear what an NDP could include such as areas to be protected, promotion of leisure and tourism, and business creation, as distinct from what the Parish Council have decided the Lyonshall NDP should include, i.e. what the Parish Council believe they can control. The July 2017 document was much better in this respect! 7. 1.2.2 The Herefordshire Core Strategy was adopted on 16th October 2015, not 2016 . “The NDP has the same plan period as 	<p>Change; Correction of date.</p> <p>Check All pages are numbered & update contents page</p> <p>As already advised the Plan will be inspected by an independent advisor.</p> <p>NDP enables land development over the period – should be included should the possibility arise for a new hall.</p> <p>Change: Correct date</p>
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				<p>the adopted Local Plan ie up to 2031” – see my comments under Time Period above. Omission of a start date looks like a “fudge”.</p> <p>8. 1.3.1 “Overall there were around 200 responses to the questions in the consultation (July 2017)” – see note under “Evidence Bases” above. THIS IS VERY IMPORTANT – CHANGE OR JUSTIFY!</p> <p>9. 1.3.2 “...there is an overwhelming desire to maintain the essential rural character of the Village and the wider Parish”. <u>This may well be true</u> but if so it needs to be demonstrated in an evidence base and the NDP needs to show how building 100 to 200 new homes (in a parish which had only about 300 homes in 2011) conforms to this requirement.</p> <p>10. 1.3.3 This again blurs the distinction between the NDP and the Parish Council and puts Parish Council funding ahead of local people’s wishes! This is “putting the cart before the horse”; it is also extremely narrow-minded. Think again!</p> <p>11. 1.3.4 I don’t think the respondents to Lyonshall NDP surveys and consultations will consider their involvement was designed just to make life easier for planning officers, regardless of whether or not they have any personal involvement with the Hereford planners! As for this document being “short and very clear”! Alter or omit.</p> <p>12. 1.3.5 The “democratic” credentials of this document and of the “process” in Lyonshall since 2014 are extremely questionable (see “Legitimacy” paragraphs above). It is also foolish, in my opinion – and a waste of public money - to carry this process through to “the very end” and rely on support for the Plan in a local referendum (What will you do if only 3 people vote and 2 of them say “No”?) Think again. (As is rightly said under 1.3.6 it is important that the NDP reflects the “priorities and concerns” of local residents but this First Draft clearly does not do so! <i>Something must be done to ensure that a significant proportion of Lyonshall residents vote and know exactly what they are voting for.</i>)</p> <p>13. Vision and Objectives 2.3 I think any concern about “over-large estates” in the minds of most of the 93 respondents to the July 2017 consultation referred more to the total number of new</p>	<p>Change: Correct to “almost 100 responses”.</p> <p>Over 90% of respondents to Issues and Options supported this wish.</p> <p>Note: We do not recognise this number range of houses.</p> <p>NDP is a parish council document.</p> <p>Document is short with clear policies.</p> <p>If 3 people vote with 2 being the majority the NDP process starts again from reg 14.</p> <p>All consultations have been well publicised.</p>
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				<p>houses built or planned. This is misleading; re-draft to ensure the Parish Council/NDP Steering Group takes responsibility for “housing density”, not local residents. <i>(Please note – I think most local residents would support the proposed housing density if they are obliged to have the total numbers of new houses now being considered. That’s not the point.)</i></p> <p>14. Planning Policies – This whole section is full of non-sequiturs, contradictions and claims about residents’ opinions which are unsubstantiated or misleading e.g. 3.1.21. (The issue of “affordable housing” is particularly difficult to follow and this section adds to the confusion!) Re-think and then re-write?</p> <p>15. Local Built Heritage 3.1.23 – Appendix 3 - Take out reference to Broxwood Court which is not included in the figures, not in the Parish and unexplained.</p> <p>16. Business 3.2.2 – Misleading. “Renovation of redundant buildings” – do you mean the work provides short-term contracts for builders, plumbers etc. or that these buildings are all guaranteed occupied by new companies when refurbished. “Home based businesses” almost never employ anyone but the home-owner. (To attract more home-based businesses you have to find reasons for them to come to Lyonshall, rather than anywhere else.)</p> <p>17. Rural Enterprise and Tourism 3.2.7 – 3.2.9 “There is nothing this plan can do to improve that” What a defeatist remark! There is a great deal this Plan could do to promote tourism in Lyonshall, including such simple and inexpensive things as signposting, developing or improving sites and persuading private landowners to allow public access. (See also Built Heritage 3.3.6 and 3.3.7) Think again.</p> <p>18. Built Heritage 3.3.5 For “Appendix 11” read “Appendix 3” unless there’s another appendix I’ve missed! Note: The “buried medieval</p>	<p>The Steering group have consulted widely and the plan has been drawn from responses after careful scrutiny.</p> <p>Part included in Lyonshall Parish.</p> <p>The NDP primarily addresses development of land. The core strategy document delivers this policy.</p> <p>Change: use number not roman numerals</p>
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				<p>village” is totally unacknowledged, despite extensive local support following a public meeting in 2010/11.</p> <p>19. Built Heritage 3.3.8 Misleading! This document is about the Parish of Lyonshall; sites which are outside the Parish are totally irrelevant.</p> <p>20. Wildlife 3.3.10 Misleading! As above (<i>Built Heritage</i>) it is nonsense to include sites and habitats which are NOT in the Parish as though they were, especially when a) nothing has been done in the past to protect the sites in the Parish we could protect, b) there are many other sites in the Parish which deserve protection and c) this document states quite specifically that “development proposals that impact on local wildlife and habitats identified on Maps 6 and 7 will not be prevented” (Draft Policy LE2). Lyonshall has already lost one Local Wildlife Site to housing development (although I notice it is still on the list). How many more? I suspect a “hidden agenda”. (<i>Any idea that one can replace a tree in Ancient Woodland simply by a trip to the Garden Centre is ludicrous. Similarly digging a large hole will not provide instant habitat in the place of a long-established pond.</i>)</p> <p>21. Community – Memorial Hall – see 5 above.</p> <p>22. Community – 3.4.6 – Hopefully when the Royal George re-opens and its ancillary facilities are developed we may be able to regain some sense of “community” in Lyonshall. Personally, I think it highly unlikely that there will be “greater demand for community facilities” or that “investment from developer contributions” will be necessary. This Neighbourhood Development Plan is supposed to be about what the people of Lyonshall want, not about how much money the Parish Council can screw out of housing developers in exchange for how many building plots.</p> <p>23. Transport and Accessibility 3.5.1 – 3.5.3 – I don’t disagree with what is said here but feel that the importance of improvements to the road structure should be emphasised in the light of both general traffic increase in rural areas (delivery vans etc.) and the massive increase in Lyonshall traffic which will follow if/when 111</p>	<p>Need to show those in close proximity.</p> <p>This is a misleading extract because it ignores the clear protection which follow the words. Policies LE1 & LE2 offer protection by development constraints.</p>
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				<p>or more new homes are built. The Plan should at least include some suggestions as to how this could be managed in the short and long terms – “too difficult” is not an option.</p> <p>24. Appendix 1 and Site Locations Map – There is a discrepancy in the numbers of new builds here:</p> <table data-bbox="929 336 1720 405"> <tr> <td>Burnt Orchard</td> <td>Appendix 1 – 3 houses</td> <td>Map – 5 houses</td> </tr> <tr> <td>Opposite The Close</td> <td>Appendix 1 - 7 houses</td> <td>Map – 11 houses</td> </tr> </table> <p>10 houses on these developments or 16?</p> <p>Summary</p> <p>Regardless of whether or not the developments proposed in this <i>First Draft Plan</i> are sufficient and desirable for Lyonshall and regardless of my personal preferences on each point, this is a shoddy document.</p> <ul data-bbox="898 663 1738 1350" style="list-style-type: none"> • It is in a format which most people will find impossible to evaluate because it is far too long, even if they have the necessary facilities to print it out and the time to read and analyse it. • The salient points – particularly with reference to the total number of houses proposed – are buried in the small print of the text. • It is confused regarding timing, failing to clearly differentiate between what is a <i>fait accompli</i> as a result of the 7-year delay in producing this plan (2011 – 2018) and what Lyonshall residents could still influence through an NDP. • It does not convincingly demonstrate a response to the wishes of the majority of Lyonshall residents. • It contains contradictory and ambiguous proposals. • It makes claims which it cannot substantiate and uses them to influence decisions. • It is perfunctory in its attitude to issues which do not directly relate to housing or the income to be made from housing developers. 	Burnt Orchard	Appendix 1 – 3 houses	Map – 5 houses	Opposite The Close	Appendix 1 - 7 houses	Map – 11 houses	<p>Change to correct figures and use latest version emailed by NR V3 13th March</p> <p>The NDP group were disappointed by the nature and the tone of this 4971 word response.</p> <p>We will address the five categories under the correspondent’s heading of ‘Issues.’</p> <p>Time period. The dates on the consultation read 2018 to 2031 as this how Herefordshire Council prefer to look forward.</p> <p>Total Housing numbers. We are confident that people reading the draft are</p>
Burnt Orchard	Appendix 1 – 3 houses	Map – 5 houses									
Opposite The Close	Appendix 1 - 7 houses	Map – 11 houses									

			<ul style="list-style-type: none"> • It fails to make any meaningful distinction between the NDP Steering Group and the Parish Council and limits its scope to matters within the control of the Parish Council (<i>unelected and therefore not representative</i>). <p>In short, this not an NDP as most of the Lyonshall electorate would understand it and cannot be demonstrated to represent the views of the majority .</p> <p>Regrettably I would expect the response to this <i>First Draft NDP</i> to be very small and response to successive documents and proposals as outlined under <i>Next Steps</i> to be ever smaller.</p> <p>I believe that the only hope for a Lyonshall NDP is</p> <ul style="list-style-type: none"> • to produce a much simpler, shorter "<i>Issues and Options</i>" document in printed form; • to obtain 40% response or more to every specific question or policy proposed to support the view that the Plan has a mandate; • to then ask the Parish Council to ensure that it does not contravene Hereford CC strategy; • to then redraft the <i>First Draft NDP</i>, again in a much shorter and clearer format so that it is readily understandable by all, • and to re-submit it for Lyonshall residents' approval in a printed form delivered to every household. • It will be important to chase response if 45% is not readily forthcoming; submission to Hereford can only follow after 40% + response has been received. <p>Unfortunately I doubt whether in the light of this fiasco the residents of Lyonshall can ever be persuaded to take an interest in any Neighbourhood Plan, even a brand new one, so perhaps, 7 years and £6,000 down the line, it is time for us to abandon any hope of an NDP and to trust that the normal planning procedures of Herefordshire Council, coupled with the enterprise of individuals in the Parish, will be</p>	<p>aware that there are already approvals in place for 68 houses as this was stated in bold lettering prominently in the Issues and Options consultation in July 2017.</p> <p>Legitimacy of evidence base.</p> <p>There is no minimum response rate required to legitimise a response. There is inevitably a reduced response rate over time. The legislation on the final vote to accept or reject the plan allows for a simple majority of those that vote. We use the simple majority view to decide on each item in a consultation. That is how a democracy works.</p> <p>Everyone must have the opportunity to express their views. This was covered by always posting or hand delivering invitations to consultations to all registered voters. The Material is always available in hard copy at the consultations and is on line. In addition, it was clear that</p>
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				<p>sufficient to ensure that Lyonshall can rebuild its sense of community and enjoy a sustainable future.</p>	<p>if someone wanted a hard copy to look at it would be provided. It was considered irresponsible to produce hard copies for everyone at the outset as the majority of people do not need them.</p> <p>It is clear from the responses that a lot of people have read the full document.</p> <p>Legitimacy of the NDP process</p> <p>The PC is responsible for accepting and producing the NDP. The first working group started as a large group but quickly reduced as members resigned as did the complainant. Following the approval of the Hereford Core Strategy the PC formed a new group of 6 people who were able and prepared to put in the hours required to complete the plan. Three people, including the Parish Clerk were part of the PC and three parishioner. During the process one non-PC member found it increasingly difficult to</p>
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					<p>attend meetings owing to business commitments. The remaining 5 continued. Then after the completion and analysis of the last major consultation (issues & options) one member suffered a stroke and resigned on health grounds and then another member sadly passed away. At that time a meeting was held and the decision taken to carry on with the remaining 3 members. With the majority of the work completed the group external consultant had the information to complete the first draft. There seemed little point in introducing new members who would need to take time to get up to speed. This was reported to the PC , minuted and approved - minute reference 160/17.</p> <p>It was noted from experience on other NDPs that the working groups reduced to 2 or three as indeed did the earlier</p>
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					<p>Lyonshall NDP working group.</p> <p>Inconsistencies in the first draft.</p> <p>Yes, there were some and that demonstrates the benefit of consulting on the first draft before going to the formal Regulation 14. These have will be corrected, thank you for bringing them to our attention.</p> <p>No NDP Option</p> <p>Parish Council has decided to prepare an NDP, and this was supported by the Parish responses to the numerous consultations. If the Parish were not preparing an NDP its future would fall under Herefordshire Council Rural Development Plan. Development control, design and density would be determined by Herefordshire Council. The overwhelming desire to preserve the essential character of Lyonshall would not be protected under the Herefordshire Rural</p>
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					Development Plan. This is contrary to all the evidence in the NDP consultation process. The parishioners of Lyonshall have demanded this NDP.
16. Resident	No	LH1 Map 5		<p>At 2011 Lyonshall (excl Holme Marsh) had 271 dwellings (301-30). At July 2018 additional approved dwellings (excl Holme Marsh) of 57 (68-11) (21% incr. to date v Core Strat 12% by 2031). Table 1 adds 43 dwellings Total excl. infills etc: 100 (+37% NDP v Core Strat +12%). For Holme Marsh: 2011 30 dwellings. Additional approved to date: 11 (37% incr. to date v Core Strat 12% by 2031). Addition of The Holme – adds 6 (estimated) dwellings. Total 17 (+57% incr. to date v Core Strat 12%). At 3.1.2 the Heref.C.C Core Strategy: “Lyonshall (village) is identified in Table 4.14 as the main focus of proportionate housing development, and Holme Marsh is identified in Table 4.15 as a settlement where proportionate housing is appropriate” Q3 of the July 2017 consultation was inadequate for purpose. It simply asked “Do you agree with the proposed settlement boundaries”. The objections raised to the 8 houses in the Field behind the Mission Hall make it clear that the majority of residents at Holme Marsh did not want it. However, with only 10% (30/271) of dwellings at Holme Marsh, the residents were not fairly considered. Given the high level of objections to the 8 houses, as documented in the various Parish Council meeting minutes and the PC objections raised to the development on behalf of the Holme Marsh residents, it is wrong to conclude in 3.1.12 that “The proposed settlement boundary for Holme Marsh was also included in the Issues and Options consultation. Overall 68.8% of respondents supported the proposed settlement boundaries for</p>	

				<p>both settlements, and the settlement boundary for Holme Marsh has been carried forward unchanged into the First Draft NDP".</p> <p>Rather most Lyonshall village residents would have voted for their village, and most Holme Marsh residents for theirs.</p> <p>Q3 should have been set and analysed differently, to more accurately reflect the opinions of Holme Marsh residents.</p>	
		Housing densities at Holme Marsh		<p>The recently approved development of 8 houses at Holme Marsh must be seen as an aberration and unacceptable.</p> <p>LH 3 – High Quality Design.</p> <p>With regards LH3.2 it is appreciated that it says "Towards the edge of the village and in Holme Marsh, development should be more scattered in form, with low plot density and individual properties set within large plots "</p> <p>However, LH3.1 refers to Appendix 1: Proposed Housing Density</p> <p>It is appreciated that it says "The development at Holme Marsh is separated from the village, ..., and so their densities could be expected to be lower.</p> <p>But worrisome that it concludes "it was decided that the NDP would not specify different housing densities according to location, but give a single figure for all developments within the settlement boundary. This maximum density has been set at 12 dwellings per hectare"</p> <p>Also welcome is 3.1.11: "areas at the edge of the village have historically enjoyed a lower density as the roads transition from open countryside to the village"</p> <p>And also welcome is 3.1.21 "With the exception of the four sites referred in Table 1, the remaining developments within the new boundary will be infill sites and not of a size to require affordable housing."</p> <p>In conclusion:</p> <p>Appendix 1 needs to be amended so that Holme Marsh is given a significantly lower density than 12 dwellings per hectare. The aberration of the 8 houses is 11 dph, and any new figure should be based on Upper House A2 and set at 4 dwellings per hectare.</p>	<p>It would be difficult to justify 4 dph at Holme Marsh. However, as this settlement is at the edge of the village consideration for a reduced density of 8dph is characteristic and justifiable. Change: 3.1.12 change Holme Marsh to 8dph & policy LH1.3.</p>

17. Resident	Yes		General	<p>Throughout the whole process of the NDP we have been reconciling the priority concern not to alter the essential character of Lyonshall with the large amount of development already agreed and the additional development coming out of the consultation. The developments that form part of that essential character are already established and in particular they have established gardens which in themselves form an important part of that character.</p> <p>We are now faced with building a large number of new houses that in the main will not have established gardens and it will take time for their gardens to grow so they blend into or more accurately fit into the essential character of Lyonshall.</p> <p>I would therefore like to propose an amendment to the draft that requires every newly built house with one or two bedrooms to plant one 5 metre tree during construction, and every new house with three or more bedrooms to plant two 5 metre trees.</p> <p>The rationale is that it will help the new houses to retain/respect the essential character of Lyonshall and it will be a good boost to the environment. The cost of these trees is likely to add less than a half per cent of the purchase price of the new houses but their impact will be of real benefit in maintaining that essential character whilst also providing a major benefit to the environment.</p>	<p>Change : include mature natural species tree planting of 3-5 metres on developments 2 bed = 1 tree on site 3 bed = 2 trees on site</p> <p>This will help development sites to achieve mature character more quickly.</p>