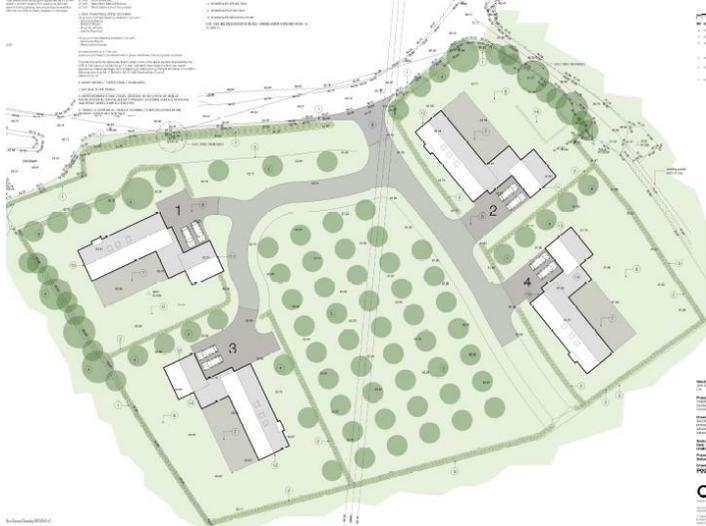


Dilwyn Neighbourhood Development Plan

Schedules of Representations in response to Draft Plan, November 2018

Schedule 1: Community Representations and Response

Respondent Identification Number	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Suggested Changes Parish Council Consideration (In blue)	Proposed Change Number
C.1 J Spinks	Paragraph 2.6	Recommend change	Inaccurate - we now have relatively fast broadband (fibre to premises in some cases) in most of Dilwyn? Many people work from home. This paragraph in the NDP reflects the Resident's survey (April 2017) and the information received from people within the Parish within this. Representations received to the draft NDP suggest some residents still have problems.	No change proposed in relation to this representation
	Policy DW2	Support	Agree to the distinction between the 'core village' and settlement along the Common lane, with the break adjacent to the Chapel Fields development (yet to be built). Noted with thanks	No change proposed in relation to this representation
	Policy DW3	Support	Agree to what is proposed in terms of the sites for housing, one large and one smaller plus infills. Good to note that the larger site will be divided into smaller parcels which complements the adjoining settlement and respects the communities desires expressed in the residents' questionnaire. Noted with thanks	No change proposed in relation to this representation
	Paragraph 5.7	Support	Agree that the mature trees should be protected on the smaller development site adjacent to Brookside Bungalow. Also agree with the type of housing proposed in future with a mixture of affordable and intermediate housing, housing for older people downsizing and also working from home. Support for the provisions in relation tree protection and types of housing required are welcome.	No change proposed in relation to this representation
	Policy DW16	Support	Agree to the green areas and community facilities Noted with thanks	No change proposed in relation to this representation
	Policy DW8	Recommend change	The plan of the vistas and views needs to be amended slightly so that Vista 2 is from the Venmore Road as described in the text, rather than where it currently is pointing to which is further away from the road, and IN the field adjacent to the houses along the Common Lane. The advice is helpful, and a correction is proposed	See Change No 17
	Policy DW10	Support	Agree with the local green space which should be protected! Noted with thanks	No change proposed in relation to this representation
	Policy DW17	Comment	Suggestions for the CIL money could be spent on: - replacing the rather ancient playground equipment in the school playing field, which is used by the community, including visiting relatives. (It tends to be used out of school hours, not by the school pupils during school hours). - improvement to footpaths by installing more kissing gates - improvement to the only public toilet in Dilwyn in the church! Composting toilet is not very nice to use. Could do with a WC.	See Change No 20

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			<p>The suggestions about areas where any income from planning obligations/CIL may be spent are helpful. At this stage it is uncertain if and when Herefordshire Council will introduce any CIL. A list of Parish projects that might be funded through S106/CIL might usefully be maintained and a change is suggested to cover this.</p>	
	Map 3	Recommend change	<p>Map of settlement boundary - does not accurately reflect the area of the Chapel Fields development, for which planning permission has already been given - the settlement boundary should be almost continuous except for the track to the public right of way and field gate plus a small corridor of land which gives the farmer access to the rear of the field behind the development boundary and the field behind Hazelwood. It is important that this is accurate as it is the gap in the settlement boundary between the core village area and The Common settlement boundary. The boundary in the draft NDP leaves a larger 'hole'/gap in the settlement boundary than the area which already has planning permission.</p> <p>The gap shown in the Village Policies Map reflects the planning permission granted under Code P171452/F. This proposes an orchard area between two sets of two dwellings in order to reflect the gap between Dilwyn and Dilwyn Common. The reason for this is set out in the 3 Planning Officers Report at the bottom of page 4/top of page 5, viz:</p> <p>'In terms of layout, a similar approach to the originally approved scheme is adopted and the orchard at the centre of the site is retained to preserve the visual break in the street scene fronting Dilwyn Common Lane.'</p> 	See Change No 7
	New Policy	Recommend change	<p>It would be good for our NDP not to allow for situations where plans are significantly altered/amended AFTER permission has been given. i.e. mission creep. e.g. Chapel Fields development. Not sure if this is feasible within an NDP?</p> <p>The concern is recognised, and a reflection of concerns expressed by many residents. However, it is understood that there</p>	No change proposed in relation to this

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			have to be material planning considerations that would be affected in order to refuse changes. It is not something that can be done through the NDP but we have tried to ensure that policies within the NDP set out those important requirements that are material and need to be complied with.	representation
C.2 R and J Ekanite	Paragraph 5.7 (Policy DW3.b)	Objection	We are fully aware that houses are a necessity and support the need for housing. However, this need for housing all too often seems to ignore many serious issues such as road safety, community, sewage, woodland, trees, the environment, wild life, crime. In the past, we were told that there should be no more houses causing extra traffic on the Common Road and yet here we have a proposal for 3-5 new houses. See Appendix 1	See Appendix 1
	Policy DW6	Objection – in relation to DW3 a)	The tranquil beauty of Dilwyn for both residents and visitors will be adversely affected by the development of 30-50 houses on a single site. Swamping our village with intensive housing will have a very negative impact on the character and possibly safety of the village. We need to question, given the already stated inadequacy of the sewage system, whether the sewers will cope with the additional 30 or more proposed houses in the village. See Appendix 1	See Appendix 1
	Policy DW9	Objection in relation to DW3 b)	The sewage system regularly overflows along the common road. On one occasion, raw sewage was coming through the manhole cover near Chapel Corner, causing a dangerous and unacceptable problem, dispersing sewage down the road in both directions. The road floods at the proposed site and is therefore impassable. This obviously causes immense disruption to traffic, including emergency vehicles, particularly given that the road floods in several other places further along the common road. The serving Councillor Roger Philips, while serving on the Parish Council some years ago, said the Common Lane was not a suitable road for development because of all the reasons above. See Appendix 1	See Appendix 1
	Policy DW11	Comment	It is imperative that residents are consulted to give their views before plans are submitted to Herefordshire Council. This was a courtesy which was not extended to residents with regards to the Chapel Field development. The first we knew about it was on the pages of the Hereford Times. Consultation on planning applications is a matter dealt with by Herefordshire Council. Herefordshire Council's Statement of Community Involvement sets out how it proposes to consult on the range of planning matters including planning applications. In this regard it encourages those wishing to apply for planning permission to discuss their proposals with those that would potentially be affected. In addition, for significant applications, it indicates the views of the public should be canvassed. These include sites of 10 or more dwellings – see para 10.15 and 10.16 at https://www.herefordshire.gov.uk/download/downloads/id/1566/statement_of_community_involvement_january_2017.pdf However, this is not a matter that can be required in the NDP although it might be encouraged in relation to the proposal covered by Policy DW4.	See Change No 10
	Policy DW19	Objection in relation to DW3 b)	This development will intensify the problems already being experienced on the common road such as: <ul style="list-style-type: none"> - The vulnerability of parents walking with pushchairs and young children - The high volume of traffic on the common road at school and play group drop off and pick times - The vulnerability of pedestrians, horse riders, dog walkers, cyclists, tourists and vehicle drivers on a road which is too narrow. Drivers have to give way to each other and use drives and other passing places in order to get past each other. 	See Appendix 1

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			The common road is not wide enough for two vehicles. See Appendix 1	
C.3 E Pledge	Paragraph 2.16	Objection in relation to DW3 a)	'the majority did not want to see developments of more than 4 houses. And yet option 4, chosen by the steering group, suggests a huge development of 30-50 houses. I understand the impossible situation foisted upon the committee and appreciate the hard work undertaken to come up with this plan. Given the insufficiency of smaller sites to meet the demand for a high number of houses and the need to avoid option 5, I understand why this option has been chosen. But I want to point out it is not what the majority wanted. See Appendix 1	See Appendix 1
	Paragraph 3.9	Objection in relation to DW3 b)	The proposal to build 3-5 houses to the east of Brookside Bungalow will not help with road safety. The common road is narrow and already hazardous for everyone. The four houses on the Chapel Field site have not yet been built. The scenario where you have two building sites a few metres apart with the additional construction traffic, road closures etc is not a pleasant one. Once the houses are built there will be an additional 20 or so cars on a narrow, bendy stretch of road. See Appendix 1	See Appendix 1
	Policy DW4	Objection	It is essential that the residents in existing properties bordering the proposed development site are consulted by developers and that they are allowed to give their views about plans. The three separate plans for the Chapel Field site were never shown to or discussed with the neighbouring residents. I would hope that the developers of such a large development, which will have a huge impact on existing residents, will show more respect and courtesy. See Appendix 1	See Appendix 1
	Policy DW9	Comment	At the moment there are 11 new houses in the pipeline which have yet to be built or occupied. The effect these additional properties will have on the sewage system is unknown. In the past there have been problems with flooding, sewage pipe blockages and raw sewage seeping out through manhole covers. An additional 57 properties will certainly be a challenge. I am heartened to see that the onus will be on developers to work with Welsh Water on upgrades or to provide alternative arrangements. However, it will be the residents who live along the common road who will ultimately be the ones who suffer if the 'evidence' on written plans ends up being incorrect. See Appendix 1	See Appendix 1
C.4 J Hall	Whole Plan but in particular Section 5 (Housing)	Support	I feel that overall there should be starter and affordable family housing built to support the Village Hall, Local Pub, Church and School. We need a more balanced village regarding the age of residents. I have no objection to the Draft Neighbour Plan. (Declares that on the NDP Steering Group). Noted with thanks	No change proposed in relation to this representation
C.5 T Kyles	Para 3.13/4	Support	Agree option 4 accepting a higher level of growth. To meet the need for affordable housing in the community. This will greatly support our little village through , baby group, play group, school, hall, church pub, WI, cedar club, village show, the list goes on..... Noted with thanks	No change proposed in relation to this representation
	Policies	Comment	Sites are best placed to achieve the outstanding goal of housing and to deliver the affordable the community greatly needs.	No change

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	DW3 and DW4		Noted with thanks	proposed in relation to this representation
	Paragraph 5.11	Question and comment	Is 57 enough? Initially yes but we are 13 years away from the next NHDP update. This number of houses could be built in 2-5 years. Windfall of infill down the common should also be promoted in line with current planning regulations. May also top up above 57 Herefordshire Local Plan Core Strategy sets out levels of growth across the County for the period 2011 to 2031. The growth for Dilwyn needs to be seen within the wider context and it is understood that development will come forward within the rural areas in advance of the City and market towns because of infrastructure constraints in those larger settlements. It is felt that the proposed level of growth which is slightly greater than the minimum required will provide for the wider needs of the community without placing too great a strain on the village's environment. An allowance for windfall development within the settlement boundaries is provided based on past trends. It is expected that Herefordshire Council will review its Local Plan upon which growth is based at some stage and Dilwyn NDP may also need to be rolled forward. It should be at that stage that the approach might be reviewed to determine whether and if so how further growth might be accommodated.	No change proposed in relation to this representation
	Paragraph 5.12	Comment	It is easy to be priced out of our little village, I myself struggle to save as quick as the house prices rose. Affordable, a mix of part ownership, rent etc are all important for the growth of the community and developers need to pay attention to this detail The allocation of a relatively large site through Policy DW4 aims to enable affordable housing to meet such needs.	No change proposed in relation to this representation
C.6 JR Gerrish	Paragraph 3.14	Comment	The level of growth chosen, as recommended by the AECOM report, is crucial to the success of the village in that it will allow the current demographic imbalance to be addressed, thereby ensuring future sustainability of the village and its facilities. Noted with thanks	No change proposed in relation to this representation
	Section 5	Comment	In providing new homes, it is essential that primary consideration is given to sensitive development that will ensure proper regard being paid to the beauty and historical significance of the village while providing, in particular, housing that will be available for a wide range of people but most especially to young families at affordable prices. Noted with thanks	No change proposed in relation to this representation
	Section 6	Comment	Any development in Dilwyn must not only conserve its existing beauty, both in historical and environmental terms, but also add to what we already have. This is spelt out very clearly in the Plan. Noted with thanks	No change proposed in relation to this representation
	Section 8	Comment	The success of Dilwyn in maintaining and developing its community facilities is well recognised: The School, the Church, the Pub and, most recently, the Playgroup have all benefitted tremendously from magnificent community support. Controlled growth can only enhance this aspect of village life and lead, perhaps, to further development such as a shop. Noted with thanks	No change proposed in relation to this representation
	Whole Plan	Comment	This Plan, I firmly believe, is a very well-considered and prepared document that, if supported by the community, can only benefit Dilwyn in its future development. Noted with thanks	No change proposed in relation to this

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				representation
C.7 S and P Kyles	Policy DW2	Comment	<p>This clearly identifies the fact that Dilwyn needs some new housing. All consultations and reports indicate that the development should include some low-cost family homes. This would go part way towards addressing the current demographic imbalance in the village. Unless this issue is resolved, much of what is good in the community could become unsustainable in the long run. Encouraging young families to the village is particularly important for maintaining our church, school and The Crown. If the new houses were placed in different infill areas, Dilwyn centre could lose many of the green spaces that are an integral part of our village's character, natural beauty and feeling of openness. Furthermore, by only building on small infill sites there would be no requirement to build any small lower cost properties. So one larger site on the edge of the village would meet the need, whilst retaining the character of Dilwyn. (The choice of materials and designs should be chosen to blend in with existing buildings in the village.)</p> <p>Noted with thanks</p>	No change proposed in relation to this representation
	Policy DW3	Comment	<p>We think that the development of the 3.7acre site for 30 houses rather than 50 would allow housing density more in keeping with that in the village. (In fact, lower density than that of Castle Mount is envisaged.) It would also enable small courtyards to be developed with varying styles that fit in with existing Dilwyn heritage. Likewise, on the 0.3 acre site on The Common, we would prefer 3 houses in keeping with the density of The Common, rather than a bigger group of properties. Any building on The Common should also pay particular regard to sewage disposal issues and potential water overload from run off.</p> <p>Noted with thanks. However, it should be noted that the figure of 30 dwellings on the 3.7 ha site is an indicative figure. Having said this there are a number of constraints, in particular the need to protect the setting of the Scheduled Monument beyond the north-east corner and to address storm water drainage issues that will restrict the development of some of the site such that the figure suggested is reasonable in terms of suggesting the contribution the site might make to the required level of proportional housing growth. With regard to the 0.3 acre site, policies within section 6 of the plan, particularly DW8, DW9 and DW11 cover the issues of design and drainage.</p>	No change proposed in relation to this representation
	Policies DW6/7/8/10		<p>We agree with the need to protect the green spaces, vistas and heritage sites as identified in the plan, as these are essential to the character of Dilwyn and should be safeguarded for the future.</p> <p>Noted with thanks</p>	No change proposed in relation to this representation
C.8 R J Verdin	Policy DW3	Support	<p>Support the site and intend to make it available during the plan-period.</p> <p>Noted with thanks</p>	No change proposed in relation to this representation
	Policy DW4	Support	<p>Support the site and intend to make it available during the plan-period. Agree to the site being made available in such a way as to provide a mixture of housing sites as proposed in the policy.</p> <p>Noted with thanks</p>	No change proposed in relation to this representation
C.9 R Brown	Whole Plan	Comment	<p>Agree with the NDP but would highlight the following as important – no more development in the centre of the village, leaving the school field, village green, the Bankie and field opposite Townsend House with the castle Pond (all green spaces); retain hedgerows to encourage wildlife and wild plants; important to maintain the church as a historic building and a space for</p>	No change proposed in relation to this

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			community and events, activities and a place for Christian worship. The Green spaces are protected principally through Policy DW10. Some of them will also be protected by other policies within the NDP as well, for example being outside the settlement boundary (DW2), protection of heritage assets (DW7), and protection of views (DW8).	representation
C.10 J and P Colling	Paragraphs 2.9 and 2.15	Objection to Policy DW3 b)	The lane in front of Tan House Cottage, Greystoke Lodge and the Tan House through to Brookside bungalow regularly floods after heavy rain/snow, making it impossible to drive out of our gates and on some occasions even to walk out. See Appendix 1	See Appendix 1
	Paragraphs 3.9 and 3.10. Policy DW3(b)	Objection to Policy DW3 b)	The Tan House is directly opposite the 0.3 ha plot of land to the east of Brookside Bungalow. The lane here is very narrow and quite dangerous and vehicles regularly have to pull off the road onto our driveway, fronting or double gates, in order to avoid passing traffic, people, horses etc. To introduce more traffic which would be created by the proposed development would be irresponsible and sooner or later could cause an accident. We would no longer feel safe when walking/driving out of our gates. See Appendix 1	See Appendix 1
	Paragraphs 2.14 and 5.7. Policy DW3(b)	Objection to Policy DW3 b)	The plot opposite The Tan House would read to the removal of a high hedge destroying the character of the lane, a natural habitat for wildlife, etc. If there is to be more housing in Dilwyn it would be more sensible to keep it on the outskirts of the village rather than invade and spoil our unique and very special environment. See Appendix 1	See Appendix 1
C.11 R and M Flack	Paragraphs 2.9, 2.11 and 2.15	Objection to Policy DW3 b)	Flooding near Chapel Corner after heavy rain makes it difficult and sometimes impossible for cars to pass See Appendix 1	See Appendix 1
	Paragraph 2.15. Policy DW3(b)	Objection to Policy DW3 b)	The sewage manhole outside The Tan House has overflowed on a number of occasions resulting in the County Council having to flush the system and clean up. They will have records of this. Additional houses at this site will, increase the problem. See Appendix 1	See Appendix 1
	Paragraphs 3.9 and 3.10. Policy DW3(b)	Objection to Policy DW3 b)	Common Lane is narrow and winding with few passing places. The restricted visibility and additional traffic will have safety implications. See Appendix 1	See Appendix 1
	Paragraphs 2.14, 3.2, 5.7, 5.11 and 6.3. Policy DW3(b)	Objection to Policy DW3 b)	The site is within the Conservation area. Frontage development along Common Lane will result in the removal of a large mature hedge opposite Greystone Lodge, affecting the habitat of local wildlife and the appearance of this attractive country lane. It is used by dog-walkers, horse riders, cyclists and children walking to school. All activities that would be impacted by more traffic. Dilwyn is an attractive rural village with plentiful green views of trees and fields. Too much new build with frontage on the road will change this. See Appendix 1	See Appendix 1
	Policy DW5	Comment	There is a need for more houses, particularly starter homes and the Orchard Close site would seem to be the least intrusive. Noted with thanks	No change proposed in relation to this representation
C.12	Whole Plan	Comment	Have no specific comments or changes to make in regard to a specific policy.	No change

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D Brown			Noted with thanks	proposed in relation to this representation
C.13 S Thomas	Appendix 1 paragraph A1.11	Recommend change	Spelling mistake – Turve House and Turve Cottage should be Turvey House and Turvey Cottage	Spelling corrected
			Grateful for pointing out these errors.	
C.14 E Brown	Policy DW4	Comment	Very sad that a development of 30+ houses has been sanctioned on a single site. Too suburban. I hope the style will be varied. Otherwise a comprehensive plan and well done.	No change proposed in relation to this representation
			The purpose of allocating a large site is in order to achieve a suitable number of affordable houses and a range of accommodation sizes to serve the community. Policies in the plan aim to ensure the design of new dwellings is sensitive to existing building within the village. Policy DW4 sets out specific requirements in addition to those covered by other policies within the NDP. This includes reflecting the size and scale of nearby developments in order to avoid a large suburban mass of housing. See also Appendix 1	
	Paragraph 6.7	Comment	The 'Bankie' is important to the village and needs to be preserved and a right of way down to the bottom gate. It has important recreational value and historical significance.	No change proposed in relation to this representation
			Noted with thanks. The draft NDP seeks to protect this as Local Green Space and for the protection of an important view.	
	Paragraph 9.4	Comment	The footpaths need more regular maintenance	No change proposed in relation to this representation
Noted but this is not a matter that can be covered in the NDP				
Appendix 1. Paragraph A1.11	Recommends changes	Locally important buildings – add The World War 2 look-out bunker and the Hop Pickers Hut at Bidney	No change proposed in relation to this representation	
		These structures have some historic interest rather than architectural or conservation merit in terms of contributing to the wider setting and character of their locations. They are of somewhat temporary nature in terms of their materials and location. It considered more appropriate that they be treated as archaeological structures with potential use in historical research and that they should be recorded through photographs and measured surveys, with records lodged in Herefordshire HER in accordance with paragraph 8.5 of Herefordshire Council's Archaeology and Development Supplementary Planning Document. In this way they might make a useful contribution to local agricultural and World War II history. Designation as buildings of local interest in such locations is unlikely to offer any protection, restoration or avoid their further deterioration.		
C.15 I Brown	Paragraph 2.4	Comment	Bus services are currently sparse - with an expected increase in local population, it is important that there should be improved services.	No change proposed in relation to this representation
			The NDP cannot directly influence the provision of public transport. It is to be hoped that Herefordshire Council's increased emphasis on housing within its rural settlements is matched by greater support for public transport.	
Paragraph 3.3	Comment	A suggested range of 30-61 homes would seem quite broad and justification for the higher numbers should be sought. It would be good, however, to plan / install infrastructure to cope with any number within the range	Herefordshire Council has set the minimum housing target which amounts to 46 for the period 2011 to 2013, of which 15 have already been committed. The NDP provides for around a further 33 which takes provision to just over the minimum and	No change proposed in relation to this representation

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			indicates that it might be expected that a further 9 will come forward through small and acceptable infill sites or dwellings in the countryside – based on past trends. There are supporting papers about housing needs that were used to inform the decision about the extent and type of housing that might be provided, and these are available on the Parish Council’s website. Infrastructure and utility bodies have been consulted and consider the safeguards set out in the NDP meet their needs.	
	Policies DW8(6) and DW19(g)	Recommends Change	Apart from being minimal, street lighting should be more in keeping with the character of the village which, on a technical point, should include considering the nature of the light emitted. LED lighting has an important eco-friendly aspect to it, but colour temperature should also be considered, e.g. "warm white" should be chosen over "cool white" Unfortunately, the technical elements of street lighting is not a matter that can be included in the NDP.	No change proposed in relation to this representation
	Paragraph 6.7	Comment	The Banky is an important social / recreational feature of the village, for its traditional use as a sledging slope - its right of way for this purpose should be formalised, if not already. Noted with thanks. The draft NDP seeks to protect this as Local Green Space and for the protection of an important view. It is understood that the Public Right of Way is marked on Herefordshire Council’s Definitive Footpath Map.	No change proposed in relation to this representation
	Paragraph 7.7	Recommends Change	NO should be the response to wind turbines, but YES to supporting installation of solar panels, particularly on industrial and farm building roofs. Also, "traditional-style" house roof tiles, with PV capability (e.g. Solar Slates/Shingles), should be specified for roofs on new-build houses. It would be preferable to avoid solar panel-filled fields and instead use rural fields for food production. Grant funding should be made available to assist with these initiatives. The NDP cannot explicitly rule out wind turbines or be more specific in terms of the specification of a particular type of roof tiles. Grant funding is a national issue and not one that can be covered in the NDP.	No change proposed in relation to this representation
	General comment	Comment	The effect that the proposed 5-year policy review cycle and the end of current NDP phase, in 2031, will have on all the work put into NDP, is unknown? Changes to local or national policies may not be based on "holistic" thinking. Conservation areas already seem to be discretionary and the housing market can't be controlled. Currently, building homes is the way adopted to accommodate arguably already too many people in the UK? Perhaps somewhat cynically, it also seems a way to squeeze people out from under parental roofs and into paying Council Tax and other government revenues? NDP seems a positive step in local control and determination, but maybe a cautious eye should be kept on the bigger picture? Comment noted	No change proposed in relation to this representation
C.16 E and E Jones	Policy DW3(b)	Objection	(a) This location has major storm water and foul water problems to field, roads and sewers, see item 2.15 on Development plan. (b) The road is too narrow to allow cars to pass each other. When traffic meets they already have to use driveways to avoid a collision. It will help you if we explain the two points in more detail. (a) We have regular overflowing of the sewage manhole due to the current volume with die County Council having to flush the system and clean up the mess. Large rainfalls bring to the area major floods from Chapel Corner, resulting in a visitor having to stay an extra night, being unable to drive her car through the deep water. On another occasion we had to be rescued by a high sided vehicle. (b) See item 3.10 on Village plan. The road is simply too narrow with restricted visibility. This is "an accident waiting to happen"! Some years ago, while serving on	See Appendix 1

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			the Parish Council, we were told by Roger Phillips, our then County Councillor, "No further development would be allowed on the Common Lane as it was not suitable for further expansion". Should you decide to proceed with this project, I look forward to you writing to explain how you intend to solve the sewer, flooding and traffic problems See Appendix 1	
C.17 A Brown	Whole Plan	Support	The document is a well-produced, detailed, thorough examination of the Parish needs and successfully addresses the important issues. It is a comprehensive and very good policy document that pays excellent regard to housing, business needs, whilst protecting heritage, landscape and ecology. Noted with thanks	No change proposed in relation to this representation
	Policy DW4 and paragraphs 5.7 and 5.8	Comment and Recommends Change	For any large development this is the best site although due to its proximity to the Scheduled Monument of castle Mound (and moat and ponds to the east of the mound) any development should be limited to a maximum of 30 homes due to potential physical/visual impact to the mound/moat and ponds and that may be caused by increased household water usage and sewage works development. The site is also former marshy ground and like the neighbouring Castle Moat housing development, it will need to address water drainage issues to create a stable house foundations. Careful attention must be paid to ensure any land drainage to this does not affect any spring or ground water sources that feed the eastern castle moat and pond as we do not want to see these historic important areas of water dry up, causing environmental damage. Its proximity to the mound and lidar evidence of possible ditches on the 'mere' meadow, possibly an archaeological; watching brief could be encouraged/ recommended in case any evidence of a prehistoric nature or later human activity may be present. This would take place during house foundation digging and unlikely stop development. Should the owner of Castle Mound be consulted to confirm if, during discussions with Historic England, the pond is now incorporated into the Scheduled Monument. See Appendix 1. The matter of whether the Scheduled Monument might be extended is not one that can be progressed through the NDP.	
	Policy DW10	Comment and Recommends Change	Agree with the sites put forward as green spaces. With regard to green space 2 the northern green line appears to go through the position of the possible squared moated site. This is obviously due to the limited detail of the map, but I hope for the final policy document, a more detailed boundary line is created, positioned beyond the site and closer to the road boundary. This is a drafting error that should be remedied. It should be noted that further information in relation to this area has been compiled as part of the Heritage Impact Assessment for Dilwyn Castle Moated Mound - see Appendix 2.	See Changes Nos 18 and Appendix 2 for further changes
	Policy DW18	Comment	Please do not include speed bumps/sleeping policemen in any calming measures. Noted - There are a range of potential traffic calming measures that might be used that do not include speed bumps.	No change proposed in relation to this representation
C.18 J and J Huntley	Policy DW3(a)	Objection	Over development at a single site (ISA): <ul style="list-style-type: none"> The proposal indicates that at least 30 houses will be built on site 18 A. This is entirely at variance with the wishes of Dilwyn residents, who clearly (significant majority via the Residents Survey, page 4, Q7) favoured smaller developments and limited to deliver the minimum perceived level of housing need (Draft Neighbourhood Development Plan [DNDP], Community Questionnaire report Q7, page 5). The decision of the steering DNDP to develop one major and a few small sites ('option 4' in Strategic Environmental Assessment, section 5.2 and 5.3, pages 10 and 11), and recommending a higher level of housing growth than necessarily required by Hereford Council appears 	See Appendix 1

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			<p>to be, therefore, inconsistent with the views of most villagers.</p> <ul style="list-style-type: none"> • The actual number appears to be undefined; whereas a 'minimum' of-30 is required and suggested for ISA by the DNPD steering group, 'a developer' has indicated this site has the potential for 50 or so dwellings (DNPd, policy DW3, section 5.6, page 19). Since increased numbers of houses equates to more profit for the developer, then it is likely that the pressure would be for a major development totally out of keeping with the rest of the village. • Herefordshire Council's Planning Authority has previously assessed this site (termed HLAA/161/001). In their SHLAA report, they state 'Development over the entire site would be inappropriate and would give rise to infrastructure requirement at odds with the character of the area. Some well-designed and sensitively located low density housing may be tenable although the adjoining Castle mount/Orchard close developments present a robust edge to the village'. This report states a maximum of 15 houses for this site. • This proposed development will be on the main incoming western approach to the village. The impact of a (relatively) large housing estate in such a prominent position will be detrimental to the image and character of Dilwyn as a small rural and historic 'black and white' village. • The DNDP steering group have suggested that the impact of this development can be mitigated by designing the estate as a mini village with a main street and areas leading off into small courtyard's with 'individual character', so that it would be more in keeping with the rest of the village (DNDP Policy Document DW4, page 19, section 5.8). One only has to look at similar developments underway e.g. opposite Hopelands Hall in Weobley, to know that this will look exactly what it is: a major modern housing estate dominating the edge of the village. • The existing houses of Orchard close and Castle mount which border site 18A have short rear gardens approximately only 5 metres or less from the site boundary. This proposal would have a significant impact in terms of privacy, views and noise on these existing dwellings. The narrow 'wildlife' corridor suggested is unlikely to ameliorate this impact. Similarly, the setting of the historic Ringwork at Castle Mount may be adversely affected. Suggested screening by deciduous native/apple trees will not be effective during winter without any leaves on them. • We realise the need for housing but feel that a much more sympathetic and imaginative solution is required, with smaller more discrete developments using a combination of sites identified (e.g. 18 A, 11 and 17?), in keeping with the rest of the village. <p>Flooding risk:</p> <ul style="list-style-type: none"> • Site 18A can be classified as 'wet pasture land', and is identified by the Governments Environmental Agency flood map as an area at risk of surface water flooding. • Approximately 50% of the area of 18 A is so designated-mainly in the central and eastern end of the field. A south-eastern central area is considered at 'high risk'. • Overlooking this site we can confirm that water only slowly drains and dissipates (several days) in wet weather (see attached pic). • Although development on such land can be achieved, this will require extensive drainage adding cost to the development, which is not compatible for 'affordable homes'. In addition, effects of water displacement may have a 'knock on' effect on surrounding houses and areas further 'down stream'. As far as we are aware, no professional flooding 	

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			assessment has been made for 18 A and oddly, we can find no mention for risk of surface flooding in the Dilwyn Strategic Environmental Assessment for this site. A full assessment of drainage and potential flood risks should be performed before any decision is made. See Appendix 1	
C.19 C and M Hesketh	Paragraph 3.9 and Policy DW3(b)	Objection	If you consider roads and traffic to be important, why approve more houses on the Dilwyn Common Road, which is single track and has numerous blind bends? All new development should be located nearest to major roads, not along single-track roads. See Appendix 1	See Appendix 1
	Paragraph 3.10	Comment	Agree but developers must ensure that all new property has at least 2 parking spaces. Noted although the requirement is to meet Herefordshire Council's parking standards.	No change proposed in relation to this representation
	Paragraphs 5.4 and 5.7	Seeks clarification	Infilling on Common Lane 0.3 ha to the east of Brookside Bungalow, Dilwyn Common Lane. Suggests a minimum of 7 houses here. But 5.7 states between 3 and 5 which is correct? The figure of 7 dwellings (para 5.4) relates to an allowance being made for infilling within all the settlement boundaries as a whole and not just that along Dilwyn Common Road. The figure of 3 to 5 dwellings (para 5.7) relates to the allocated site along Dilwyn Common Lane.	No change proposed in relation to this representation
	Policy DW4(iv)	Comment	Whilst the provision of 2 - 3 bedroomed affordable housing would be welcomed by those in need of this type of accommodation, consideration MUST be given to the poor transport links. Unless the new home owners have their own transport, they could feel very isolated. See Appendix 1	See Appendix 1
	Paragraph 5.10	Comment	Will developers ensure that even 2 bedroomed houses would have adequate parking for at least 2 cars? Developers will be required to comply with Herefordshire Council's parking standards in accordance with policy DW19 e).	No change proposed in relation to this representation
	Paragraph 5.12	Comment	See point iv) above. (Presume reference to DW4(iv)) See Appendix 1	See Appendix 1
	Policy DW6	Objection to policy DW3 b)	Feel any development on the Common Lane would certainly not preserve or enhance the Parish's important landscape, character, beauty and amenity. See Appendix 1	See Appendix 1
	Policy DW8(f)	Comment and question	The original plans for 4 houses on Chapel Bend certainly did not meet this criteria – being described by some as looking like a crematorium! What safeguards will there be to ensure that what plans are passed, will actually be built - Tyrells 'Cottages' a prime example - a pair of semis indeed! This NDP, when adopted, sets out the design requirements that Herefordshire Council will be required to consider. Reliance will need to be placed upon the professional views about design by Herefordshire Council's planning and other specialist officers in order to interpret this policy. It will, however, enable the Parish Council to raise concerns at the time of any future applications. The buildings referred to have yet to be constructed. It remains to be seen whether these buildings will meet the	No change proposed in relation to this representation

Respondent Identification Number	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Suggested Changes Parish Council Consideration (In blue)	Proposed Change Number
			requirement to preserve or enhance Dilwyn Conservation Area. Should they prove to be a disappointment, when built, then this can be pointed out to Herefordshire Council in order to avoid further poor design. However, at this point in time, no such judgment can be made.	
	Policy DW9	Objection to policy DW3 b)	Although you are aware that areas on the Common Road are subject to flooding, nothing can compare to photographic evidence, and although the photos were taken after most of the flooding had abated, the attached photos taken by us whilst we have been in residence will hopefully make the planners more aware. There has been problems with blocked sewers along the Common, fronting Greystoke Lodge, Tan House Cottage, Little Oak and Cedar Rise, resulting in emergency work being carried out. We feel any new houses would exacerbate the situation, and the thoughts of major sewerage works with the ensuing disruption, along such a narrow lane is unthinkable! See Appendix 1	See Appendix 1
	Policy DW11(f)	Objection to policy DW3 b)	There is no mention of where access/egress is to the proposed development east of Brookside Bungalow. If this were to be the pathway opposite Cedar Rise/Little Oak, we feel this would be a gross infringement on our living space. As with many drives on the Common road, cars do pull in to let others pass. This we accept, but not the construction and subsequent residential traffic that would undoubtedly use our driveway. We do not have the space in which to turn round in our drive and frequently have to reverse into the lane. See Appendix 1	See Appendix 1
	Policy DW11(i)	Objection to policy DW3 b)	Do you realise the amount of pedestrian traffic that travels along the Common at the moment? School opening and closing times brings an increase in both vehicular and pedestrian traffic. Due to the nature of the road, even with a proposed 20 mph speed limit, we feel the increased level of housing can only lead to an increased possibility of serious accidents. See Appendix 1	See Appendix 1
	Policy DW14	Comment	Although with the advent of fibre to the village, high speed broadband has improved, speed is still inconsistent and not as good as it could be. Noted – the purpose of this policy is to support additional infrastructure to address this issue should it be required.	No change proposed in relation to this representation
	Policy DW18; Paragraph 9.2	Comment	Whilst it is important to ensure the safety of all pedestrians, we feel the type of traffic calming measures should be given full consideration. The impact certain measures could have on Dilwyn could totally change our lovely rural village, to something resembling the suburbs of the city. Having lived next to a village that had 'traffic calming' measures introduced, we know how this can destroy the ethos of the village. Although we are very mindful of the safety of everyone in the village, do we really need to introduce numerous signs? See comments in above paragraph. There are both good and bad examples of traffic measures that have been used. The intention would be to seek the former. Such measures would be introduced through consultation with the community.	No change proposed in relation to this representation
	Policy DW19(c)	Objection to policy DW3 b)	If, as stated, you feel the new developments should ensure that their proposals should not lead to a significant increase in speed or the volume of traffic travelling on roads that do not have sufficient capacity, why the need for traffic calming, and why consider proposing to build houses on Dilwyn Common? See Appendix 1	See Appendix 1
	Paragraph 9.3	Objection to policy DW3 b)	'Comprehensive treatment of access arrangements' - Could this mean road widening along the Common Road? Depending on the entrance/egress road to the Brookside Bungalow development, could this mean instead of the leafy woodland glade opposite our	See Appendix 1

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			drive, we are faced with a huge amount of concrete and tarmac and flood water pouring down when it rains? See Appendix 1	
	Policy DW20	Objection to policy DW3 b)	The views from our house are very important to us! We chose to live in Dilwyn because we fell in love with its location, its very rurality and its people. We realise that change may be inevitable to meet certain Government quotas, but consideration must be given to the existing residents well-being and area's infrastructure to accommodate such levels of housing. See Appendix 1	See Appendix 1

Schedule 2: Stakeholder Organisations Representations and Responses

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Comment Parish Council Consideration (in blue)	Amendment Number
S.1 Herefordshire Council (Statutory Consultee)	Whole Plan	Comment	Overall the plan is a well written and well researched plan. It is clear to see that the policies have taken into account the views of the local community and have carried out various consultations. It is clear that the plan takes a positive approach towards identifying settlement boundaries and allocation of housing in line with the Core Strategy. Noted with thanks	No change proposed in relation to this representation
	Policy DW1		In general conformity with Herefordshire Local plan Core Strategy. Consider replacing ‘absorbed into’ to ‘integrated with’ which is more in line with the CS. The policy is generic and tends to add little to the CS equivalent. It broadly echoes the same criteria without any attempt at tailoring, to fit the localised context or address local issues. This is not a conformity issue but Inclusion of this policy seems superfluous, when the issues are already addressed in the same manner in the CS policy. Conformity noted. Suggestion accepted. There is no reference to which equivalent policy within the CS. Should it be SS1, that does not explain the elements of what sustainable development that the CS covers. NDP policy DW1 comes from the community and highlights those particular priorities which it considers need to be addressed within the NDP. From reviewing other NDPs, it takes a similar approach to that used in many and these have been recognised as useful and supported by Examiners. It is not superfluous to the community in setting out its concerns.	See Change No 6 No change proposed in relation to the last representation
	Policy DW2		In general conformity with Herefordshire Local plan Core Strategy Conformity noted.	No change proposed in relation to this representation
	Policy DW3		In general conformity with Herefordshire Local plan Core Strategy. Appear to have had no previous historic potentially contaminative uses. Conformity noted.	No change proposed in relation to this representation
	Policy DW4		In general conformity with Herefordshire Local plan Core Strategy. Given the aim of the policy you may want to consider changing (iv) to read limited number of homes above 4- bedrooms . Appear to have had no previous historic potentially contaminative uses. Conformity noted. The Parish already has a large number of 4 bedroomed dwellings and the Housing Needs Assessment undertaken by AECOM concluded (Table 2 - See Evidence base for full document): 1. In relation to ‘demand/need’ – ‘There is a preponderance of large homes, creating a ‘top heavy’ profile in the current housing stock; this, and other evidence, suggests an under-supply of smaller homes. Local agents report both high demand for three bed properties and an under-supply of these sizes of homes. within rural parts of the LHMA there is strong demand for small homes, but not flats, suggesting a mixed typology of	No change proposed in relation to this representation

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Comment Parish Council Consideration (in blue)	Amendment Number
			<p>dwelling would be appropriate in future development, offering one, two and three bedroom homes with a very small number of larger family dwellings.'</p> <p>2. In relation to dwelling size – 'No further development of larger homes to rebalance stock in favour of smaller dwellings to address mis-alignment issues. The preponderance of larger homes in the area suggests that policy should not seek the delivery of homes of four or more bedrooms. This is supported by demand data which suggests that, while there is strong demand for homes of all scales at county level, within the rural parts of the LHMA there is substantially less demand for AH of four bedrooms and above. development should therefore offer 1,2 and 3 bed houses.'</p> <p>Reference to no contaminative uses noted withy thanks.</p>	
	Paragraph 5.12		<p>Affordable Housing - May consider re-wording the following: and these may both social rented and intermediate housing - and these may include both rented and intermediate housing. Rented housing is defined in note 10 at the bottom of the page.</p> <p>Helpful advice</p>	See Change No 12
	Policy DW5		<p>In general conformity with Herefordshire Local plan Core Strategy. 'Where affordable or intermediate dwellings are to be retained' - Should read 'Where affordable dwellings are to be retained' (as per note 10 at the bottom of the page)</p> <p>Conformity noted. Helpful advice</p>	See Change No 13
	Policy DW6		<p>In general conformity with Herefordshire Local plan Core Strategy</p> <p>Conformity noted.</p>	No change proposed in relation to this representation
	Policy DW7		<p>In general conformity with Herefordshire Local plan Core Strategy</p> <p>Conformity noted.</p>	See proposed change
	Policy DW8		<p>In general conformity with Herefordshire Local plan Core Strategy</p> <p>Conformity noted.</p>	No change proposed
	Policy DW9		<p>In general conformity with Herefordshire Local plan Core Strategy</p> <p>Conformity noted.</p>	No change proposed
	Policy DW10		<p>In general conformity with Herefordshire Local plan Core Strategy</p> <p>Conformity noted.</p>	No change proposed
	Policy DW11		<p>In general conformity with Herefordshire Local plan Core Strategy</p> <p>Conformity noted.</p>	No change proposed
	Policy DW12		<p>In general conformity with Herefordshire Local plan Core Strategy</p> <p>Conformity noted.</p>	No change proposed
	Policy DW13		<p>In general conformity with Herefordshire Local plan Core Strategy</p> <p>Conformity noted.</p>	No change proposed

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Comment Parish Council Consideration (in blue)	Amendment Number	
	Policy DW14		In general conformity with Herefordshire Local plan Core Strategy Conformity noted.	No change proposed	
	Policy DW15		In general conformity with Herefordshire Local plan Core Strategy Conformity noted.	No change proposed	
	Policy DW16		In general conformity with Herefordshire Local plan Core Strategy Conformity noted.	No change proposed	
	Policy DW17		In general conformity with Herefordshire Local plan Core Strategy Conformity noted.	No change proposed	
	Policy DW18		In general conformity with Herefordshire Local plan Core Strategy Conformity noted.	No change proposed	
	Policy DW19		In general conformity with Herefordshire Local plan Core Strategy Conformity noted.	No change proposed	
	Policy DW20		In general conformity with Herefordshire Local plan Core Strategy. Please define what you mean by 'Important views' it would also be useful if you defined where the 'Important views' are located. Conformity noted. Important views within and close to Dilwyn village, which are most likely to be affected by development have been identified in Map 2. The approach to determining the importance of other views should take into account the contribution made to the principle settled farmlands landscape type defined in Herefordshire Council's Landscape Character Assessment	See Change No 23	
	New Issue	Recommend Change	Developments such as hospitals, homes and schools may be considered 'sensitive' and as such consideration should be given to risk from contamination notwithstanding any comments. Please note that the above does not constitute a detailed investigation or desk study to consider risk from contamination. Should any information about the former uses of the proposed development areas be available I would recommend they be submitted for consideration as they may change the comments provided. It should be recognised that contamination is a material planning consideration and is referred to within the NPPF. I would recommend applicants and those involved in the parish plan refer to the pertinent parts of the NPPF and be familiar with the requirements and meanings given when considering risk from contamination during development. Finally, it is also worth bearing in mind that the NPPF makes clear that the developer and/or landowner is responsible for securing safe development where a site is affected by contamination. It is recognised that there is no provision within the NDP to ensure contamination is addressed appropriately where it may arise and that this might be addressed with policy DW11 which also covers protection of residential amenity.	See Change No 19	
	S2 Welsh Water Dwr Cymru (Statutory Consultee)	Whole plan	Support	DCWW are supportive of the aims, objectives and policies set out. Noted with thanks	No change proposed
		Policy DW3.a)	Comment and advice	There are no problems envisaged in providing this site with a water supply. The site is traversed by a 4" distribution water main for which protection measures will be required in the form of a diversion or easement width. There are no problems envisaged with the public sewerage network accommodating the foul flows from this site. However, offsite sewers will be required to be laid to the curtilage of the site.	No change proposed in relation to this representation

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Comment Parish Council Consideration (in blue)	Amendment Number
			<p>A development of 30 dwellings (minimum) would represent a 19% increase in loadings at our Dilwyn Wastewater Treatment Works (WwTW) and this would likely result in hydraulic overload, and as such would not meet the requirements of Policy DW9 of the Neighbourhood Plan and Policy SD4 of the Core Strategy. There is no reinforcement scheme proposed in our current Capital Investment Programme (AMP6 – 2015-2020) therefore should potential developers wish to deliver the site prior to any future regulatory investment on our part, they will need to fund a feasibility study which would identify the reinforcement works required to accommodate the foul flows from their site, before entering into a section 106 (of the Town and Country Planning Act 1990) agreement to fund the scheme.</p> <p>The housing allocations proposed together with commitments are only 2 dwellings over the required minimum level of proportional housing growth set out for the village within Herefordshire Local Plan Core Strategy. It is understood that Welsh Water has committed itself to provide sufficient infrastructure to accommodate that level of development within the Plan period. Consequently, the temporary shortfall in capacity would arise for any form of development that was brought forward to meet the required level of proportional housing growth. That having been said it is understood that Welsh Water will review its AMP programme with a view to considering works during 2020-2025. Policy DW9 makes provision for delaying works until spare capacity is available or for a developer to work with Welsh Water to fund works in advance. This will apply to this development and it is noted that Welsh Water supports the policy requirement.</p>	
	Policy DW3.b)	No objection	<p>There are no problems envisaged in providing this site with a water supply. There are no problems envisaged with the public sewerage network accommodating the foul flows from this site. There are no issues in Dilwyn WwTW accommodating the foul flows from this site.</p> <p>Noted with thanks</p>	No change proposed in relation to this representation
	Policy DW9	Support	<p>We applaud the provisions of this policy which will ensure that development will only be allowed where there is sufficient capacity in the public sewerage system, and that if a development would hydraulically overload the public sewerage system then developers will need to work with Welsh Water to fund the required reinforcement works. We also welcome the requirement for developers to utilise sustainable drainage systems (SUDs) in new development as this will ensure that the public sewerage system only accommodates foul-only flows, thereby capacity is not taken up by surface water.</p> <p>Noted with thanks</p>	No change proposed in relation to this representation
S3 Woodland Trust	Section 4 (Vision, Objectives and Strategic Policies)	Recommends change	<p>Pleased to see that your Neighbourhood Plan identifies the important role that trees play, and that opportunities should be taken to increase tree cover in appropriate locations in Dilwyn. Trees are some of the most important features of the area for local people. This is acknowledged in the adopted Herefordshire Core Strategy Policy LD1 which seeks to retain and replace important trees to support green infrastructure, and Policy LD3 which identifies the retention and protection of valued landscapes, such as trees, hedgerows and woodlands. This should be taken into account with one of the objectives for Dilwyn, and be amended to include the following:</p> <p>'To promote sustainable development for this and future generations by protecting key environment assets including green spaces, ancient woodland, veteran trees hedgerows and trees and a high-quality landscape.</p>	See Change No 5

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Comment Parish Council Consideration (in blue)	Amendment Number
			<p>Helpful advice</p>	
	Policy DW6	Recommends changes	<p>Pleased to see that section 6 and Policy DW6 acknowledges that veteran trees are an important feature of the landscape which should be retained in Dilwyn. It should also recognise the fact that development should not lead to loss or degradation of trees in your parish. Increasing the amount of trees in Dilwyn will provide enhanced green infrastructure for your local communities, and also mitigate against the future loss of trees to disease (eg Ash dieback), with a new generation of trees both in woods and also outside woods in streets, hedgerows and amenity sites. Ancient woodland would benefit from strengthened protection building on the National Planning Policy Framework (NPPF). On 24th July the Ministry of Housing, Communities and Local Government published the revised NPPF which states: development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists</p> <p>The Woodland Trust believe this must be given due weight in the plan making process as it shows a clear direction of travel from central Government to strengthen the protection of irreplaceable ancient woodland and trees. Recommend that Policy DW6 acknowledges tree protection and provision by including the following: e) ‘Maintaining so that there is no harm or loss of irreplaceable habitats such as ancient and veteran trees, and where appropriate extending tree cover, utilising native tree species unless there is good reason to do otherwise’</p> <p>The Woodland Trust would suggest that your Neighbourhood Plan is more specific about ancient tree protection. For example, the introduction and background to the consultation on the Kimbolton Neighbourhood Development Plan (2017), identified the importance of ancient woodland, and how it should be protected and enhanced. Also, we would like to see buffering distances set out. For example, for most types of development (i.e. residential), a planted buffer strip of 50m would be preferred to protect the core of the woodland and Standing Advice from Natural England and the Forestry Commission has some useful information. We would like to see the importance of trees and woodland recognised for providing healthy living and recreation and also being taken into account with your Neighbourhood Plan for Dilwyn. In an era of ever-increasing concern about the nation’s physical and mental health, the Woodland Trust strongly believes that trees and woodland can play a key role in delivering improved health & wellbeing at a local level. Whilst, at the same time, the Health & Social Care Act 2012 has passed much of the responsibility for health & wellbeing to upper-tier and unitary local authorities, and this is reinforced by the Care Act 2014. Also, each new house being built in your parish should require a new street tree, and also car parks must have trees within them.</p> <p>The woodland trust’s suggested change to criterion e) represents a reason for the policy requirement rather than a policy requirement. The representation does, however, highlight that trees should be referred to as important landscape features in criterion f). In addition, some reference to the value of important trees might be made in paragraph 6.2.</p>	See Change No 14
	Policy DW16	Recommend changes	Whilst Policy DW16 does identify the fact that an audit of shortfalls in community provision is going to be acknowledged as something is taken forward, protecting natural features such as community space provision	No change proposed in relation to this

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Comment Parish Council Consideration (in blue)	Amendment Number
			<p>should also be taken into account, and it should also seek to retain and enhance recreational and local green spaces, resist the loss of open space, whilst also ensuring the provision of some more. Therefore, to what extent there is considered to be enough accessible space in your community also needs to be taken into account with new housing proposals. There are Natural England and Forestry Commission standards which can be used with developers on this:</p> <p>The Woodland Access Standard aspires:</p> <p style="padding-left: 40px;">That no person should live more than 500m from at least one area of accessible woodland of no less than 2ha in size.</p> <p style="padding-left: 40px;">That there should also be at least one area of accessible woodland of no less than 20ha within 4km (8km round trip) of people's homes.</p> <p>The Woodland Trust also believes that trees and woodlands can deliver a major contribution to resolving a range of water management issues, particularly those resulting from climate change, like flooding and the water quality implications caused by extreme weather events. This is important in the area covered by your Neighbourhood Plan because trees offer opportunities to make positive water use change, whilst also contributing to other objectives, such as biodiversity, timber & green infrastructure - see the Woodland Trust publication <i>Stemming the flow</i> – the role of trees and woods in flood protection; and other from the Woodland Trust's website.</p> <p>No specific proposals for new community-based facilities was identified at the time of drafting the NDP. Policy DW16 does make provision for further community facilities to be provided as and when they are identified. Herefordshire Local Plan Core Strategy policies OS1 and OS2 and their associated paragraph 5.1.47. advice is awaited from Herefordshire Council upon the standard it wishes to see neighbourhood plans adopt based upon an appropriate evidence base.</p>	representation
S4 Historic England (Statutory Consultee)	Whole Plan	Support	<p>Support the Vision and objectives set out in the Plan. In particular we commend the intention to protect traditional land uses (e.g. orchards) architectural and archaeological heritage including historic farmsteads and important landscapes/views. Notwithstanding our concerns (see next representation, overall the plan reads as a well-considered and concise document which we consider takes a suitably proportionate approach to the historic environment of the Parish.</p> <p>Noted with thanks</p>	No change proposed in relation to this representation
	Policies DW3 and DW4		<p>Have concerns with reference to the proposed housing allocation for land to the south-west of Orchard Close and Castle Mount (Policies DW3 and DW4). Despite the well-intentioned mitigation proposed in Policy DW4 we are not convinced at this stage that no harm would be caused to the setting of the moated mound scheduled ancient monument. Equally, we would wish to be convinced that development would not impact upon any buried archaeological remains that might potentially be associated with the extant earthworks including within its wider environs. Whilst not wishing to lodge a formal objection at this stage we would very much welcome an early detailed discussion about the proposed allocation with both the neighbourhood plan team and the local planning authority in order that these issues can be addressed. To these ends Bill Klempere, our Principal Inspector of Ancient Monuments will be happy to be contacted to progress</p>	See Appendix 2.

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Comment Parish Council Consideration (in blue)	Amendment Number
			this further at this address (or can be reached on 07867 526 564) and you will see I am copying both him and the Herefordshire County Archaeologist into this response. Subsequent discussions with the Principal Inspector of Ancient Monuments identified the need to undertake a Heritage Impact Assessment to determine whether the site might be developed in principle - see Appendix 2	No change proposed
	Policy DW6	Support	Commend the Green Infrastructure approach Noted with thanks	
	Policy DW10	Support	Commend the Local Green Space policy Noted with thanks	
	Policy DW11	Support	Commend the design and Appearance policy Noted with thanks	
S5 Natural England (Statutory Consultee)	Whole Plan	No response	No response received In having received no response it must be assumed that NE has no concerns about the draft NDP.	No change proposed
S.6 Environment Agency (Statutory Consultee)	Whole Plan	Comment	The updated evidence base for Herefordshire Core Strategy [Strategic Flood Risk Assessment (SFRA) and Water Cycle Strategy (WCS)] did not extend to Rural Parishes at the NP level so it is important that these subsequent plans offer robust confirmation that development is not impacted by flooding and that there is sufficient waste water infrastructure in place to accommodate growth for the duration of the plan period. We would not, in the absence of specific sites allocated within areas of fluvial flooding, offer a bespoke comment at this time note that you have referred to our guidance in the draft plan. The Flood Map provides an indication of 'fluvial' flood risk only. You are advised to discuss matters relating to surface water (pluvial) flooding with your drainage team as the Lead Local Flood Authority (LLFA). Comments Noted. Herefordshire Council, who is understood to be the LLFA, was consulted on the draft NDP, and has not commented on this matter.	No change proposed in relation to this representation
S.7 Highways Agency (Statutory Consultee)	Whole Plan	Comment and support	Have reviewed the consultation document provided and due to the scale of planned development within the neighbourhood area have concluded that the implementation of the plans and policies contained in the NDP is unlikely to have implications for the continued safe operation and functionality of the SRN. Support the commitments of the Parish to sustainable development principles contained within the Plan but have no further comments to make on its contents. Noted with thanks	No change proposed in relation to this representation
S.8 Coal Authority	Whole Plan	Comment	No specific comments to make on the plan. Noted with thanks	No change proposed
S.9 National Grid	Whole Plan	Comment	An assessment has been carried out with respect to National Grid's electricity and gas transmission apparatus which includes high voltage electricity assets and high-pressure gas pipelines, and also National Grid Gas Distribution's Intermediate and High-Pressure apparatus. National Grid has identified that it has no record of such apparatus within	No change proposed in relation to this representation

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Comment Parish Council Consideration (in blue)	Amendment Number
			the Neighbourhood Plan area. Noted with thanks	
SW.10 Herefordshire Council Transportation Department	Policy DW1		Criteria (f) should include cycling and public transport This criterion within the policy sets out the outcomes sought rather than the method by which this should be achieved, which are covered in policy DW18.	No change proposed in relation to this representation
	Policy DW4		There is no mention in this policy of need for traffic to access the highway safely, no cycle parking facilities or parking standards. The NDP should be read as a whole, including in association with Herefordshire Local Plan Core Strategy. Safe access is covered in policy DW19. There is also a general reference to parking in this policy although it might refer more explicitly to cycle parking as well.	See Change No 22
	Policy DW11		There needs to be regards for the provision of cycle storage facilities. Also, in (h) add 'and are in line with Herefordshire highways design guide' to the end of the sentence. These matters are covered in policy DW19 including a change to criterion 'f'	See Change No 22
	Policy DW16		Walking and cycling should be encouraged to access the school. There is very little facilities at the current time and proposals to resolve this should be supported at every opportunity, including footpaths, crossing points, cycle parking, etc.. This matter would be covered in Policy DW18 although might be made more explicit in response to the representation.	See Change No 21
	Policy DW18		There should be particular focus on accessing the school in this policy Helpful advice and a reference to this might usefully be made	See Change No 21

APPENDIX 1: DILWYN NEIGHBOURHOOD PLAN - RESPONSE STATEMENT TO POLICY DW3

1. Introduction

- 1.1 In assessing potential housing sites to meet the needs of the community and provide certainty that the required level of housing growth will be achieved there was recognition that no site was perfect in every regard but that it was a matter of balancing need/requirement with potential constraints. No sites were ideal.
- 1.2 The Regulation 14 draft NDP proposes two sites for housing development. Their development will be subject to all relevant policies within the NDP.
- 1.3 A number of representations have been received in relation to both sites. These require careful consideration and for ease of responding to matters raised this statement has been prepared to avoid duplication within the Schedule of Representations.
- 1.4 The response to representations upon the two individual sites is dealt with separately.

2. Policy DW3 a) – Land South-West of Orchard Close and Castle Mount (and DW4 by association).

- 2.1 Twelve people/organisations¹ submitted representations upon the proposal for housing to be developed upon this site. Of these 4 submissions simply indicated support.
- 2.2 Of those submitting objections to either the principle of the site's development or commented on matters of detail that should be considered, these can be summarised as follows:

i) Safety – Development will affect the safety of the village in terms of road safety and crime (C.2).

Response:

It is considered that a safe access can be provided to the site and although not directly linked to a footpath there is one reasonably close to which access can be gained. Other sites are less advantageous in this regard. The development will need to comply with policy DW19 in relation to Highway design requirements and discussions with the developer under policies DW4 x) and DW18 might provide benefits in terms of traffic calming on entry to the village from the south. Although fear of crime can be a consideration, there is no reason to believe a development cannot be designed to provide the necessary safeguards to occupants utilising 'Secure By Design' principles as required by Herefordshire Local Plan policy SD1.

The NDP might be more explicit in relation not these matters – See Change No 11

ii) Surface Water Drainage – The site is former marshy ground and will need to address water drainage issues to create a stable house foundations. Land drainage to this must not affect any spring or ground water sources that

¹ Representation references within the Schedule of Representations – C.1, C.2, C.3, C.5,C.7, C.8, C.14, C.17, C.18, C.19, S.2 and S.4.

feeds the eastern castle moat and pond as these historic important areas of water should not dry up, causing environmental damage (C.17). The site can be classified as 'wet pasture land' and is identified by the Government's Environmental Agency flood map as an area at risk of surface water flooding; approximately 50% of the area is so designated-mainly in the central and eastern end of the field. A south-eastern central area is considered at 'high risk'. Overlooking this site we can confirm that water only slowly drains and dissipates (several days) in wet weather. Development on such land can be achieved but will require extensive drainage costs, which is not compatible for 'affordable homes'. In addition, effects of water displacement may have a 'knock on' effect on surrounding houses and areas further 'down-stream'. As far as we are aware, no professional flooding assessment has been made for the site and oddly, we can find no mention for risk of surface flooding in the Dilwyn Strategic Environmental Assessment for this site. A full assessment of drainage and potential flood risks should be performed before any decision is made.

Response:

The Environment Agency's Maps for Surface Water drainage for the site is copied below:



Extract from the Environment Agency's Storm Water Flood Map.

The majority of the site falls within the low category which equates to a chance of between 1:100 and 1:1,000 chance of flooding. The area shown as having potential to flood reflects current drainage measures within the field (See Lidar map below). Reasonable measures can be undertaken in order that the development meets the requirements of policy DW9, which would include ensuring this does not result in increased flooding elsewhere. Addressing this matter and to accommodate storm water drainage from new properties so that greenfield flows from the site are maintained can have benefits for biodiversity

through the provision of a SUDs system in accordance with that policy. Welsh Water has supported this approach (see representation S.2). Herefordshire Council is the Lead Local Flood Authority for the area and has not objected to the site on flooding grounds. It is noted that development at Castle Mount and Orchard Close has taken place in similar conditions and, despite being very constrained sites, have managed to accommodate storm water drainage.



Extract from Environment Agency's Lidar Map

This site amounts to 3.7 hectares (8.9 acres) and utilising a modest density might accommodate between 80 and 100 dwellings at a medium density. The suggested contribution of 30 dwellings reflects the need to accommodate the two major constraints of drainage and protecting the setting of the Scheduled Ancient Monument. The landowner also owns the adjacent land to the east and, should it be necessary, could increase the ability to improve land drainage on the allocated site.

The NDP might again, be more explicit by pointing out the need to address this matter – See Change No 11

iii) Effect on the Adjacent Scheduled Ancient Monument and potential buried archaeology - Site is the best for large development but it should be limited to a maximum of 30 homes due to potential physical/visual impact to the mound/moat and ponds resulting from increased household water usage and sewage works development. Its proximity to the mound and lidar evidence of possible ditches on the 'mere' meadow, possibly an archaeological watching brief could be encouraged/recommended in case any evidence of a prehistoric nature or later human activity may be present. This would take place during house foundation digging and unlikely stop development (C.17). The setting of the historic Ringwork at Castle Mount may be adversely affected. Suggested screening by deciduous native/apple trees will not be effective during winter without any leaves on them (C.18). Historic England (S.4) has expressed concern indicating it is not convinced at

this stage that no harm would be caused to the setting of the moated mound scheduled ancient monument. Equally, we would wish to be convinced that development would not impact upon any buried archaeological remains that might potentially be associated with the extant earthworks including within its wider environs. In these regards it has asked for a heritage impact statement (NPPF 189 and 190) recommending the approach advocated in Historic England's Advice Note 3 'The Historic Environment and Site Allocations in Local Plans'

Response:

The NDP shows that it is aware of the setting of the Scheduled Monument through the inclusion of criterion vi). An appropriate archaeological investigation would be required through policy DW7. However, the concerns are noted, and a Heritage Impact Assessment statement has been prepared as requested (see Appendix 2) and been used to add further guidance on the protections required to the setting of the monument and to cover the possibility that there might be archaeological remains in the north-east corner of the site.

See changes 9, 11 and 18

iv) Waste Water Drainage – there is already an inadequate sewage system (C.2). Welsh Water has advised development will either have to wait until the capacity of the Wastewater Treatment Works is increased (to be reviewed in the 2020-2025 AMP period) or for the developer to discuss arrangements with it that would allow development to come forward in advance.

Response:

Welsh Water has not indicated there is any problem with the sewerage system that might serve this site. It is recognised that there is currently insufficient capacity at the Waste Water Treatment Works to accommodate growth. However, the housing allocations proposed together with commitments are only 2 dwellings over the required minimum level of proportional housing growth set out for the village within Herefordshire Local Plan Core Strategy. It is understood that Welsh Water has committed itself to provide sufficient infrastructure to accommodate that level of development within the Plan period. Consequently, the temporary shortfall in capacity would arise for any form of development that was brought forward to meet the required level of proportional housing growth. That having been said it is understood that Welsh Water will review its AMP programme with a view to considering works during 2020-2025. Policy DW9 makes provision for delaying works until spare capacity is available or for a developer to work with Welsh Water to fund works in advance. This will apply to this development and it is noted that Welsh Water supports the policy requirement.

The need to comply with policy DW9 should be made explicit – See Change No 11

v) Effect on Residential Amenity – The existing houses of Orchard Close and Castle Mount which border the site have short rear gardens approximately only 5 metres or less from the site boundary; the proposal would have a significant impact in terms of privacy, views and noise on these existing dwellings (C.18).

Response:

The site is of sufficient size to enable the amenity (which covers privacy and noise) of adjacent dwellings to be protected under Policy DW11. There is no right to a private view under the planning system and it is not a material consideration.

The need to ensure amenity is protected might be made more explicit - See Change No 11.

vi) Design adversely affecting character – development will affect the tranquil beauty of the village which will be swamped by intensive housing (C.2). The site is in a prominent position at the entrance to the village and its impact will be detrimental to its character; and despite the intentions of the policy, examples elsewhere such as opposite the Hopelands in Weobley, shows how such developments would be detrimental to the image and character of Dilwyn (C.18).

Response:

The assessment of sites identified a range of factors that needed to be considered. The effect of development on the setting of the village was one. There were a range of others, all of which had to be considered. It was felt that development on this site would have less effect on the character of Dilwyn than other alternatives that would provide for the village's needs. Opportunities are available to mitigate the effect on the entrance to the village through design, and criteria to cover this are included in policies DW4 and DW11. The site lies on the edge and just outside of the Conservation Area. Despite this the effects its setting should be a consideration and policy DW8 may need to be taken into account. The example quoted for Weobley was not subject to the policy requirements set out in those policies. The landowner has accepted the policy provisions, especially in relation to policy DW4.

The requirement to comply with relevant design policies might be made more explicit – see Change No 11.

vii) Excessive level of development – 30 houses on one site would be too suburban but hope the style will be varied (C.14). Size of development at variance to community's expressed wishes and will result in more houses than the minimum requirement set by Herefordshire Council; a minimum of 30 is indicated but a developer would likely seek more and a figure of 50 or so is indicated; Herefordshire Council's SHLAA indicates development across the whole site would be inappropriate and be at odds with the character of the area but should have low density housing and a figure of 15 is suggested (C.18).

Response:

The site is of a size that would accommodate a potentially far higher number of houses but for constraints that would include ensuring a form of design appropriate to the village which is set out in policy DW4 and also addressed in policy DW11. The community expressed support for a range of housing and environmental requirements, and in drafting the NDP it was evident that these, together with the sites available, could not be met without some degree of compromise. For example, there was significant support for new housing to meet the needs of families and starter homes, and this could only be achieved upon a larger site. The advantages of such smaller dwellings in supporting a balanced community able to support the community facilities within the village, including the local school, was recognised. The aim for this site is for it to be developed in such a way as to reflect a series of small developments.

Herefordshire SHLAA was primarily a desk-based assessment to determine whether the Core Strategy policy could be delivered. This site was the only one within or surrounding the village that was found to be in any way suitable. The SHLAA approach has been shown on numerous occasions to be limited in scope when more detailed assessments have been undertaken. It is considered that a well-designed development in the way envisaged could be sensitively accommodated and potentially better than a low-density scheme that did not reflect the general density seen around the village core, including at Orchard Close and Castle Mount. A density as low as suggested in the Council's SHLAA on this site would itself be at odds with the character of the area.

The suggested development capacity of 30 dwellings is considered reasonable given the constraints on the site.

No change is proposed in relation to these representations.

viii) Need for prior consultation - The residents in existing properties bordering the proposed development site should be consulted by developers to give their views about plans (C.3).

Response:

Consultation on planning applications is a matter dealt with by Herefordshire Council. Herefordshire Council's Statement of Community Involvement sets out how it proposes to consult on the range of planning matters including planning applications. In this regard it encourages those wishing to apply for planning permission to discuss their proposals with those that would potentially be affected. In addition, for significant applications, it indicates the views of the public should be canvassed. These include sites of 10 or more dwellings – see para 10.15 and 10.16 at https://www.herefordshire.gov.uk/download/downloads/id/1566/statement_of_community_involvement_january_2017.pdf

However, this is not a matter that can be required in the NDP although it might be encouraged in relation to the proposal covered by Policy DW4. See Change No 10

ix) Public Transport - Affordable housing would be welcomed but consideration must be given to the poor transport links. Unless the new home owners have their own transport, they could feel very isolated (C.19).

Response:

The NDP has to comply with Herefordshire Local Plan Core Strategy in terms of the amount of housing it must provide and the need for smaller and affordable dwellings has been highlighted in research for the NDP. To concentrate on providing only for those able to afford to buy houses currently available or being built in the parish would heighten the population imbalance being experienced in many rural areas. The village and parish as a community makes strenuous efforts to ensure people do not feel isolated and to be inclusive and this proposal will assist provision of housing for the widest possible local needs. Herefordshire Council is responsible for rural transport policy and this would have been a consideration when it produced its strategy for the location of housing.

No change is proposed in relation to these representations.

3. Policy DW3 b) – Land to the east of Brookside Bungalow, Dilwyn Common Lane

3.1 Nine people/organisations² submitted representations upon the proposal for housing to be developed upon this site. Of these 3 submissions simply indicated support or no objection (C.1, C.5 and S.2).

3.2 Of those submitting representations their objections or other comments can be summarised as follows:

i) Highway safety – Dilwyn Common lane is narrow, and cars cannot pass each other in many places; is used by many vehicles, pedestrians and horses; subject to regular flooding; has limited passing bays, relying on people's accesses; has numerous blind bends. Additional traffic from development would lead to a significant increase in speed and volume of traffic, and serious accidents. (C.2, C.7, C.10, C.11, C.16, C.19).

Response:

Herefordshire Council's Highways section has not objected to the scale or location of development along the lane.

All development will generate additional vehicular traffic wherever it is located. A judgment needs to be made upon whether it will have a significant effect on safety of road users. There are many locations within the County that do not have public footpaths or street lights and have narrow lanes.

It is accepted that the road leading to the small site is narrow but by its nature that limits the speed of traffic. The development might be expected to generate around 17 to 28 extra trips per day (normally considered 16 hours and based on 5.5 trips per day for a detached dwelling). Even at a higher rate of 7.5 trips per day which some transport assessments use, this would amount to 23 to 38 trips per day. These figures are based upon all vehicles coming and going not just those of residents. It is also worth pointing out that while many of us would imagine most houses might produce 2 vehicles leaving in the morning rush hour, this isn't true of the average. Consequently, the proposed level of development might generate an addition 1 to 2 additional trips per hour over the course of the day which should be acceptable along the lane. A degree of inconvenience must be accepted on all roads.

The additional traffic generated in combination with the nature of the lane should not significantly affect the current levels of safety for pedestrians or horse riders along the lane to an unacceptable degree.

No change is proposed in relation to these representations.

ii) Storm water flooding – Storm water flooding is a problem that would be exacerbated by further development. There is already major storm water flooding at Chapel Corner. Attention should be given to addressing water run-off problems. (C.2, C.7, C.10, C.11, C.16, C.19).

² Representation references within the Schedule of Representations – C.1, C.2, C.5, C.7, C.10, C.11, C.16, C.19 and S.2.

Response

The area prone to storm water flooding sits to the north of the site and flooding arises from run-off from the north-west and not from the site onto the road. A small proportion of the site is indicated to be at low risk of flooding and provision of a SUDs Scheme to serve the development should provide safeguarding for any development on the site and ensure greenfield flows from it so that it would not adversely affect any properties downstream. Development of the site might offer the opportunity to contribute towards improved drainage through providing a drain linked to the brook to the east. This is a matter that would need to be negotiated with the developer.



Extract from the Environment Agency's Storm Water Flood Map.

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The requirement to provide for on-site storm water drainage suggests that the site is most likely to accommodate 3 dwellings rather than 5. This would also reflect the density of dwellings in the vicinity.

The above might be referred to in the justification to the policy – see Change No 8.

iii) Problems with Sewer – the sewer regularly overflows, coming up through a manhole and has to be cleared. More houses will exacerbate this problem. (C.2, C.7, C.11, C.16, C.19).

Response

Welsh Water has not identified any particular issues in relation to wastewater drainage from the site. Notwithstanding this, it is recognised that there is evidence of a localised problem. It would seem from representations that this relates to storm water entering the sewerage system and one that needs to be addressed even if development was not proposed. There are alternative forms of wastewater treatment

that could be utilised for such a small development should this be considered a problem or it is not rectified before development is brought forward. NDP policy DW9 would address this issue.

No change is proposed in relation to this representation.

iv) Effect on wildlife – Development will result in the loss of a hedgerow and trees important to wildlife. (C.2, C.10, C.11).

Response

Policies in the NDP and Core Strategy require developments to ensure any loss of wildlife features is compensated for and to protect trees. These are referred to in the supporting statement although the relevant policies are not referred to.

The requirement to comply with relevant landscape and nature conservation policies might be made more explicit – see Change No 8.

v) Loss of character – the loss of features such as the hedgerow will change the character of the lane which at this point is within the Conservation Area; one representation expressed a preference for 3 dwellings to be in keeping with the density of the area; one representation expressed concern that in view of other policies the development might lead to a comprehensive scheme resulting in road widening and/or other works to create entrances that would affect the area's character. (C.2, C.7, C.10, C.11, C.19).

Response

The requirement to ensure the character and appearance of the Conservation Area suggests that the site is most likely to accommodate 3 dwellings rather than 5, although this would need to be determined through a detailed character analysis in accordance with policy DW8. This would also reflect the need to provide for on-site storm water drainage. Landscape features are covered through other policies in the NDP (see previous issue – iv. Effect on wildlife). Design policy DW11 is also relevant and in combination these should ensure any proposals, including access arrangements, take into account the character of the area. It is not anticipated that there will be a need for road widening or other more significant works although the opportunity to provide a passing bay might be suggested as a potential benefit from the scheme.

The requirement to comply with relevant policies to protect the area's character might be made more explicit – see Change No 8.

vi) Effect on Amenity and Views - Views from house are important and development. The issues of crime and community have been ignored. (C.2, C.19)

Response

There is no right to a private view under the planning system and it is not a material consideration. There is no reason to believe the site is any better/worse than others in relation to the issues of crime and community impact.

No change is proposed in relation to these representations.

APPENDIX 2: Dilwyn Neighbourhood Development Plan

Heritage Impact Assessment for Land to the south of Orchard Close and south-west of Castle Mound

1. Introduction

1.1 Dilwyn Neighbourhood Development Plan (NDP) is a new type of plan that will form part of the Development Plan for Herefordshire when it is adopted. It is not a Local Plan prepared by Herefordshire Council but shares some similar characteristics. It has been prepared by Dilwyn Parish Council.

1.2 The NDP must conform to Herefordshire Local Plan Core Strategy. It should not promote less development than is set out in that Core Strategy. In this regard it must provide for at least 46 new dwellings over the plan period 2011 to 2031. At the time the plan was drafted there were already some 15 new dwellings either built or committed through planning permissions, leaving a minimum of a further 31 dwellings to be provided for through the NDP.

1.3 Herefordshire Council had undertaken a Strategic Housing Land Availability Assessment for the village in 2015. This looked at sites within and around Dilwyn and identified land to the south of Orchard Close and south-west of Castle Mound as the only site that had any potential for housing during the plan period (See Plan 1).

1.4 As part of the process for preparing the NDP, a 'Call for Sites' was undertaken to determine whether there were any other opportunities. A number were put forward and these were assessed against a range of environmental and other criteria. The assessment can be found at

<http://www.dilwynparishcouncil.gov.uk/UserFiles/Files/NDP/2%20Meeting%20Housing%20Requirement%20Report%20and%20Site%20Assessment%20V2%20L.pdf>

1.5 Two sites are proposed in the NDP that would form housing land allocations in order to show that the required level of proportional housing growth could be met. The sites chosen were considered the most appropriate in terms of meeting the community's needs within appropriate environmental and other constraints. With regard to proposed housing site to the south of Orchard Close and south-west of Castle Mound, it was recognised that not all of the site should be developed, in particular in order to safeguard the setting of Dilwyn Castle Moated Mound Scheduled Ancient Monument. Policy DW4 in the Regulation 14 Draft NDP set out a number of criteria that should inform any proposal, including protection for the setting of the Scheduled Ancient Monument (see Appendix 1).

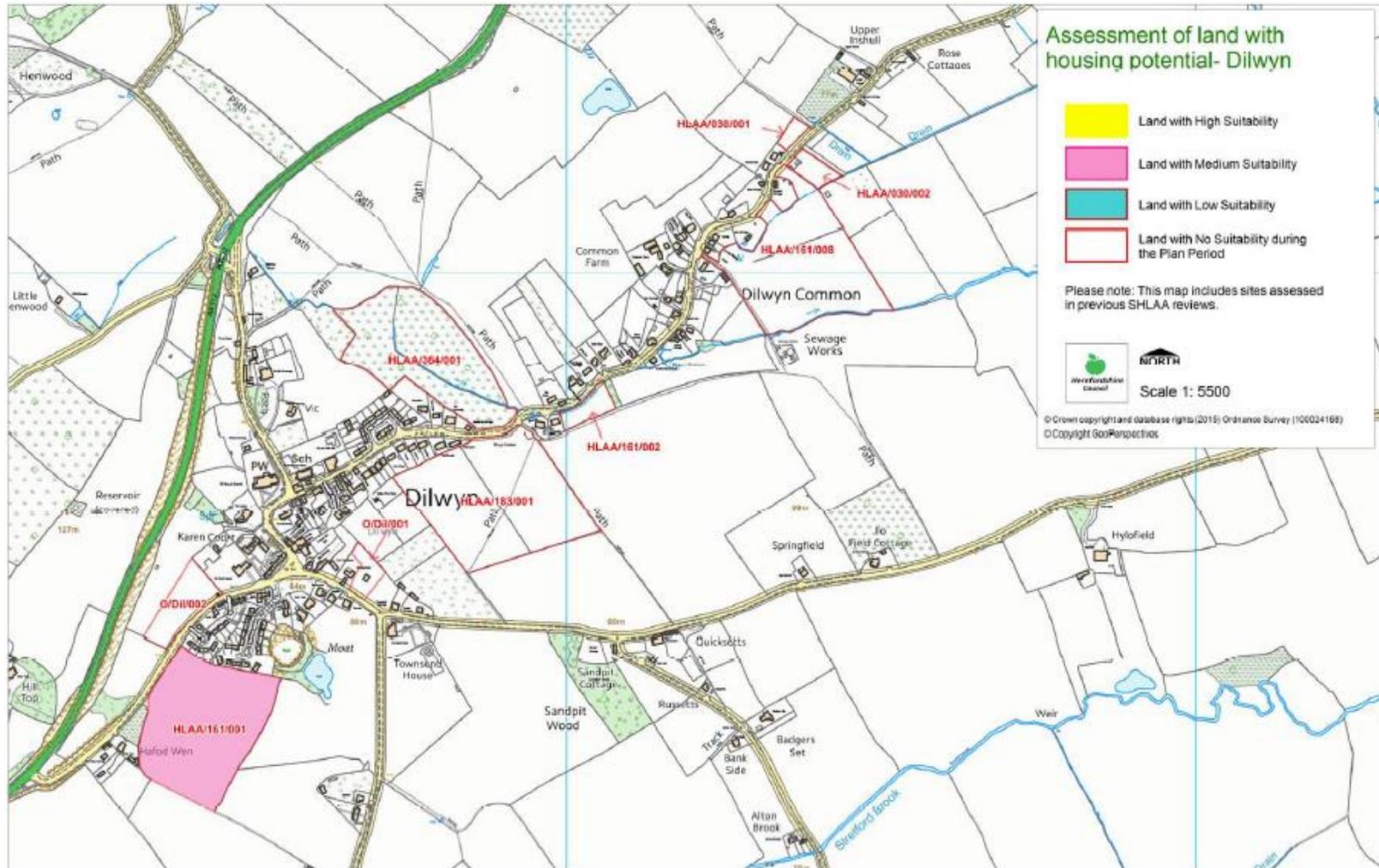
1.6 The proposed housing site covered by policy DW4 is a rectangular field sitting to the south of Dilwyn Village. Its northern edge is some 175m long and bordered by two relatively small housing estates which span some 150m of this length (including rear gardens). Dilwyn Castle Moated Mound has a common frontage of some 25m with the proposed housing site. The boundary at this point on the monument's side is an unmanaged outgrown hedge with trees behind. Similarly, the adjacent pond associated with the Castle which sits outside of the Scheduled Ancient Monument and historically was thought to have been two ponds, is surrounded in trees.

1.7 Historic England expressed concern that no harm should be caused to the moated mound scheduled ancient monument, including its setting, and that development would not

impact upon any buried archaeological remains that might potentially be associated with the extant earthworks including within its wider environs. The Principal Inspector of Ancient Monuments advised that Historic England wished to see the proposed housing site allocation accompanied by a Heritage Impact Statement. This statement has been prepared to meet that request.

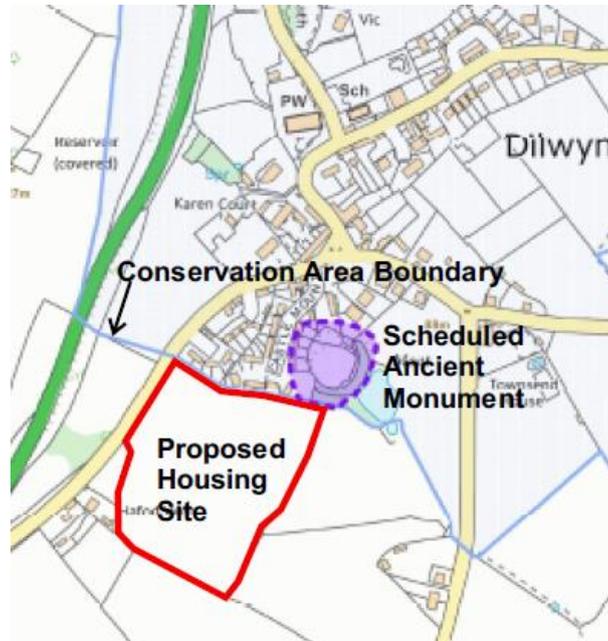
1.8 This statement has been prepared with the assistance of A Stirling-Brown and utilising the extensive local knowledge of and research by R Stirling-Brown.

Plan 1 – Extract from Herefordshire Council’s Strategic Housing Land Availability Assessment for Dilwyn, 2015



2. Heritage Assets Affected by the Site Allocation

- 2.1 Dilwyn Castle Moated Mound Scheduled Ancient Monument sits on the north eastern edge of the proposed housing site (see Figure 1). An extract from Herefordshire Historic Environment Record (HER) containing its description is provided at Appendix 2 (SMR/HER 2238). Dilwyn is a ringwork and bailey castle built on a low, but large, almost circular mound roughly 50 m (150 feet) across. It is surrounded by a deep man-made moat.



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Figure 1: Location of Scheduled Ancient Monument in relation to Proposed Housing Site

- 2.2 To the south-east of Dilwyn Castle Moated Mound are thought to have been two fishponds that sit beyond the moat. No evidence can be found relating to these in the HER. To its south-west, the Castle appears to have utilised the natural defences of marshy land that extend towards Weobley. There is evidence that to the east and west were baileys, with similar likely to the north, possibly taking in some of the village green area. The village itself also added extra protection. Only the eastern side of the moat remains and continues to retain water in part of it.
- 2.3 The two ponds referred to above were cut off from the eastern side of the moat by a narrow earth and stone causeway where the first pond is thought to have been a substantial fishpond. Another causeway, now gone, would have separated this from the second smaller and narrower pool which was originally longer. This is thought to have been for water fowl.
- 2.4 Evidence indicates that the castle was likely built not too long after the conquest and before 1100 by William d'Ecouis, who holds Dilwyn at Domesday. But an Inquisition post mortem reference in 1420 describes Dilwyn's 'capital Messuage' as being 'wasted and ruinous' (a phrase often used to describe castles in a state of poor condition) with no taxable value. This would suggest that the possible moated site might be of C15th date. The Castle would therefore have been in residential use just over 200 years. In addition, beyond the current combined pool, to the north-east, the land rises and there are traces of platforms/small earthworks (SMR/HER 53768) with disturbed ground that may have formed the site of a more comfortable

moated house that may have closer links to the agricultural community and the setting of the village and its cultural heritage.

- 2.5 At the end of the 1980s planning permission for development of Castle Mount was granted and this development covered the western bailey area right up to the mound without any archaeological excavation or report. The gardens of a number of Castle Mount properties extend into the Scheduled ancient Monument, especially at the southern end where the last curtilage in the estate abuts both the monument and the proposed housing site.
- 2.6 Lidar data for the area including and surrounding the Scheduled Monument is below.

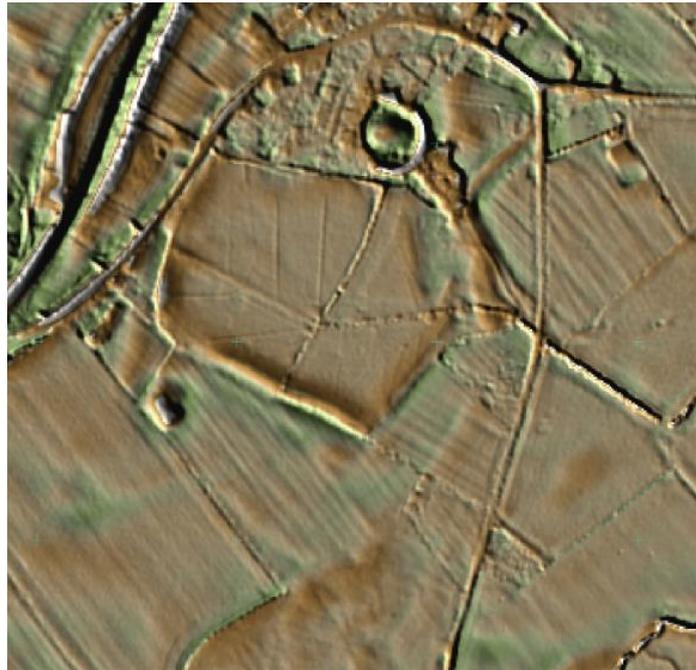


Figure 2: Lidar data of Dilwyn Castle Moated Mound and surrounding land.



Figure 3: Extract from the Environment Agency's Storm Water Flood Map.

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- 2.7 A trawl of Herefordshire Council's Historic Environment Record revealed one record upon the proposed housing site to the south-west of Dilwyn Castle Moated Mound (HER/SMR 53767). This is shown as an area located in the north-east corner of the site although potentially surrounds much of the Castle mound, being most evident to the west and north. It is described as 'A possible series of earthworks forming a large enclosure roughly surrounding Dilwyn Castle. These could possibly represent an outer enclosure or even a large outer Bailey.' This was an assumption based on Lidar data with a note to say that a site visit was needed for verification.
- 2.8 The area to the south of the Castle Moated Mound was historically marshy ground. Apart from what appears to be raised ground in a small part of the north-east corner of the proposed housing site there is little evidence of any disturbance except for what appears to be drainage works that reflect the current field drainage pattern (see Figure 3). Although expert drainage advice will be required, it would appear that the water level within the pond on the eastern side of the Castle Moated Mound is part of the system associated with storm water drainage at Castle Mount.
- 2.9 Views over the proposed housing site and adjacent Dilwyn Castle Moated Mound are available from the south-west and east. To the north and west Dilwyn Castle Moated Mound is bordered by housing within the village which curtails views both towards and from the Scheduled Ancient Monument and they form its setting in those directions. To the south-west of the Scheduled Ancient Monument there is an open aspect although the monument itself is hidden behind a dense screen of vegetation, where it appears more like a small woodland copse (4 and 5). From the east views from Townsend House of both the monument and proposed housing site are masked by woodland surrounding the eastern pools referred to above (Figure 6). The proposed housing site becomes evident as you travel south from Townsend House (Figure 7). The immediate southern edge of the monument is dominated by housing and vegetation (Figures 5 and 8), with the former curving around its western edge (Figure 9).



Figure 4: Distant view across proposed housing site towards Dilwyn Castle Moated Mound from the south-west.



Figure 5: Closer view across proposed housing site towards Dilwyn Castle Moated Mound from the south-west.



Figure 6: View from Townsend House (north-east of proposed housing site). Site hidden behind vegetation surrounding Castle Moat.



Figure 7: View from Due East.

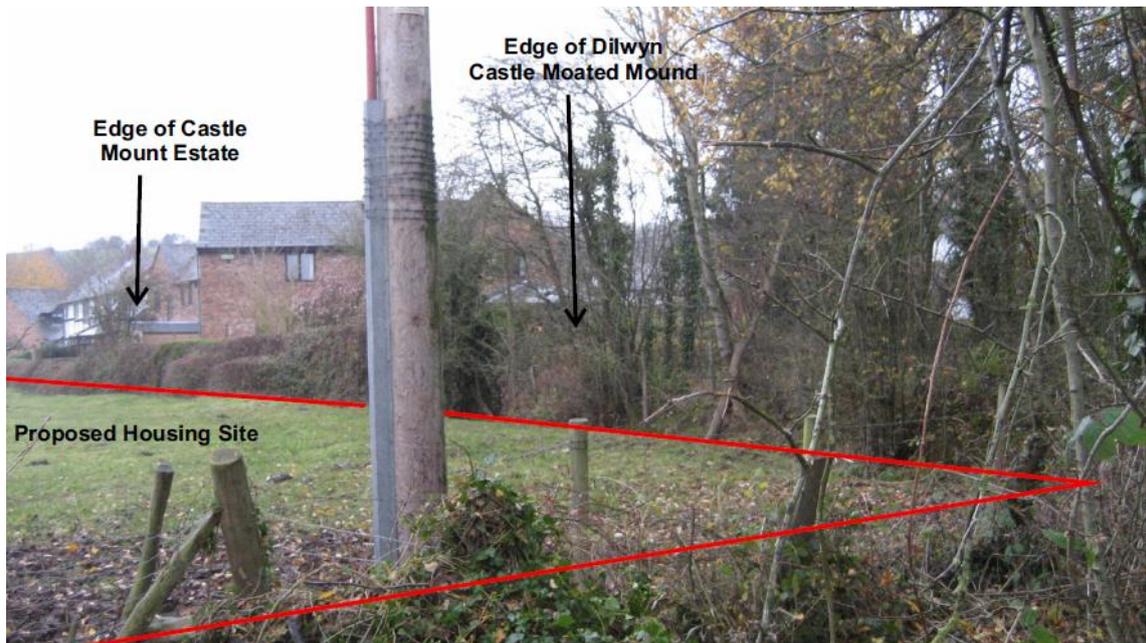


Figure 8: View of southern end of Dilwyn Castle Moated Mound Scheduled Ancient Monument



Figure 9: Aerial view of Dilwyn Castle Moated Mound and surrounding uses

- 2.10 There are a number of Listed Buildings within Dilwyn, although none appear within the vicinity of the proposed housing site. The NDP identifies a number of locally important buildings that contribute significantly to the character and appearance of Dilwyn Conservation Area.

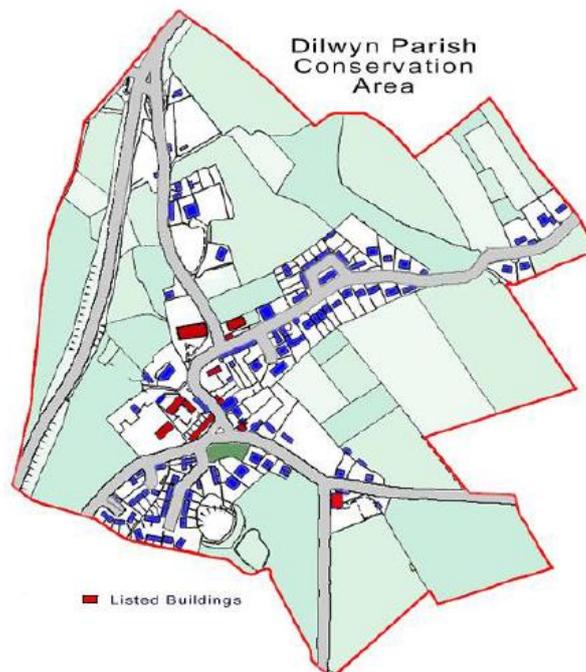


Figure 9: Location of Listed Buildings in relation to Dilwyn Conservation Area

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- 2.11 Three important buildings accommodate community uses – St Mary’s Church (Listed Grade I), St Mary’s Church of England School (Listed Grade II) and the Crown Inn

(locally important). St Mary's School was proposed for closure, placing its future at risk, until the community took control of the asset and now run a successful local primary school. Similarly, the community runs the Crown Inn. Townsend House (Listed Grade II) overlooks Dilwyn Castle Moated Mound. There are no Listed Buildings outside of the Conservation Area immediately to the south-west of the village. Those within the Conservation Area are shown in red on Figure 2.

2.12 Dilwyn Conservation Area was designated in 1974. The proposed housing site is outside of the Conservation Area although adjacent to its southern boundary. Herefordshire Council produced a draft Conservation Area Appraisal in July 2006 although this did not progress to approval. The NDP has used information from the draft Appraisal within a village-scape character area assessment. Extracts from Herefordshire Council's draft Appraisal relating to the area is provided in Appendix 3. Development at Orchard Close and Castle Mount reflects the density of development in the village core to their north.

2.13 The 19th Century map for the area (Figure 10 below) shows the area surrounding the monument largely undeveloped although surrounded by vegetation on its western and southern edges.

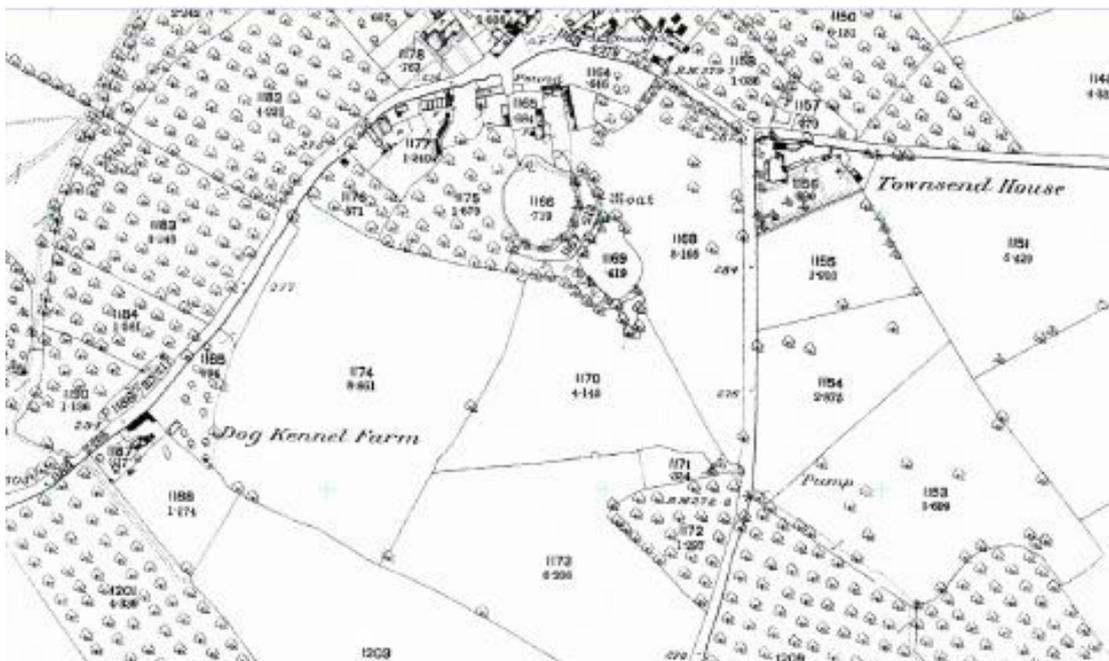


Figure 10: Dilwyn Castle Moated Mound and surrounding area, 1886

3. The Proposed Housing Site's Contribution to Heritage Assets

- 3.1 The proposed housing site does not encroach onto the Scheduled Ancient Monument although abuts it.
- 3.2 Visually, there are no clear views of the monument across the proposed housing site, and this is expected to remain the case even should the vegetation be managed in an appropriate manner, which would no doubt include the retention of a hedge.
- 3.3 Lidar information suggests that a small area in the north-east corner of the proposed housing site is slightly higher than the rest of the site and there is the possibility that it could be of some archaeological interest.

3.4 Herefordshire Council's draft Conservation Area Appraisal (extracts in Appendix 3) concludes that:

'There is no clear evidence that a planned medieval town, with a market place and burgage plots, was established here. For much of its history, Dilwyn has existed as a farming community.'

Although it also refers to *'Medieval open fields divided into long narrow furlongs surrounded the settlement, with meadowland to the north'*, there is no evidence to suggest this was the case for the proposed housing site. This is probably because the field remained marshland until land drainage was installed. Consequently, this reduces the potential for there to have been development to the south-west of Dilwyn Castle even further, and therefore the possibility of unexpected finds in this parcel of land.

3.5 This does, nevertheless, point to the open nature of Dilwyn Castle's setting in certain directions for the limited period that it was inhabited, which to the south and east would have reflected the agricultural nature of the community, although the proposed housing site is unlikely to have been farmed to any degree because of its marshy character. The historic agricultural community connection is greater to the south-east and east of the Castle through their proximity to the fish ponds that extend out from the monument and the suggested more comfortable moated house that was thought to have replaced the Castle and Townsend House. Consequently, in proportionate terms, that to the south-west, comprising the proposed housing site, might be considered less significant, especially as it is suggested that the Castle was replaced after a fairly short period by a manorial building to its east on what are suggested as building platforms on the higher land in front of Townsend House (HER/SMR 53768).

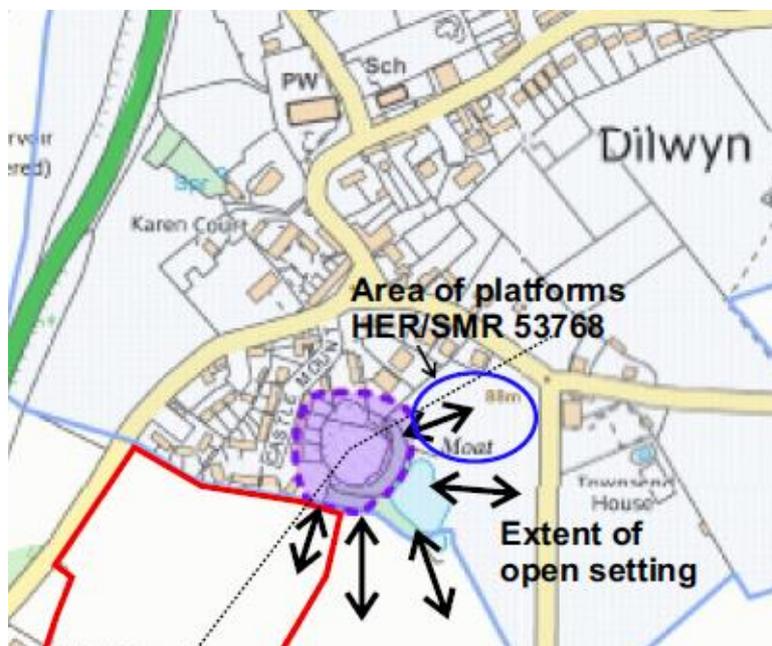


Figure 11: Areas where the open nature of surrounding land reflects the historic agricultural community.

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- 3.6 The proposed housing site sits outside of Dilwyn Conservation Area although upon its boundary. One of the key historical characteristics of the village and Conservation Area, reflected in the origins of its name as 'secret place' because it sits in a hollow, is that, as a settlement, it does not extend over the brow of the hills that encircle it. The proposed housing site sits within the hollow.

4. Impact of the Proposed Housing Site on the Significance of Heritage Assets

- 4.1 Although the proposed housing site abuts the Scheduled Ancient Monument, it is of sufficient size to enable a reasonable level of development without impinging upon land immediately adjacent to the monument's edge through defining an appropriate buffer.
- 4.2 The archaeological significance of the site, and the presence of any remains associated with Dilwyn Castle is unknown but is likely to be low across most of the land parcel, with a small area in its north-east corner having some potential.
- 4.3 The effect of development would be to reduce the open nature to the south to some extent and hence affect the historical agricultural setting. The effect is considered relatively unsubstantial in that it affects a small portion of that setting where the frontage with the monument amounts to around 25m. Furthermore, the area that best reflects the agricultural landscape and community association is to the east and south-east of the monument where the juxtaposition between the former two fish ponds, now one, the open field pattern and platforms suggesting associated buildings is of greater significance. Only a small part of the monument's agricultural landscape setting would be affected by the proposed housing site.
- 4.4 As referred to above, although the proposed housing site does not fall within Dilwyn Conservation Area it does lie within the hollow that both now and historically is a key characteristic of the settlement's form.

5. Alternative Sites

- 5.1 The required level of proportional housing growth has been set by Herefordshire Council. Options to meet this requirement were considered both in terms of approach and site options. It was not considered that there were sufficient environmental and other constraints to argue that the required level of proportional housing growth should be resisted.
- 5.2 Alternatives in terms of site sizes were considered in order to meet the outstanding requirement for 31 dwellings. Although a combination of small (0-4 dwellings) and medium sized sites (5 to 10 dwellings) might have achieved the level required, there were greater disadvantages in relation to the range of chosen criteria for many of these. In addition, housing studies identified the need to provide small and family accommodation, including affordable housing, such that a large site was required to ensure this could be delivered within the Government's planning policies for housing. Dilwyn has a strong community ethos whereby it seeks to provide and retain local community facilities such as its primary school which came under pressure to close but with the community's support became an exemplary model for local community run schools.
- 5.3 In accepting the need for a range of housing types, a large site of 11+ dwellings was considered necessary, and 8 were put forward by landowners for consideration.

These were assessed against a range of environmental and other considerations (see Meeting Housing Needs and Sites Assessment Report, June 2018 at [http://www.dilwynparishcouncil.gov.uk/ UserFiles/Files/NDP/2%20Meeting%20Housing%20Requirement%20Report%20and%20Site%20Assessment%20V2%20L.pdf](http://www.dilwynparishcouncil.gov.uk/UserFiles/Files/NDP/2%20Meeting%20Housing%20Requirement%20Report%20and%20Site%20Assessment%20V2%20L.pdf)).

Other such sites were considered to have major environmental and/or locational disadvantages whereas the chosen site (i.e. the proposed housing site subject to this impact assessment), although having some environmental concerns, it was felt these could be mitigated.

- 5.4 A number of other large sites submitted for consideration sit to the east of the monument, as will be seen in the Meeting Housing Needs and Sites Assessment report referred to above and some of these would have a greater effect on the setting to the east which is the area of heightened significance. In addition they would have a greater effect on the character of Dilwyn in that they would extend over the ridge line and not sit within the hollow that reflects the village's place name.

6. Avoiding Harm and Enhancing Heritage Assets

- 6.1 Further investigation of the area in the north-east corner of the site should be undertaken in accordance with proposed NDP policy DW7 and Herefordshire Local Plan Core Strategy Policy LD4(4). Herefordshire Council's Archaeology and Development SPG sections 6 and 7 are relevant and developers should utilise the approaches recommended within these. The extent of this investigation and whether further areas of the proposed housing site might require investigation are matters that should be discussed with Herefordshire Council's Archaeological Service
- 6.2 Although the Scheduled Ancient Monument is in separate ownership and there is no public access, the opportunity should be taken to produce a scheme that might offer access via a public footpath to the north-eastern edge of the site to enable the monument to be viewed. This would accord with Herefordshire Council's Archaeology and Development SPG section 11.
- 6.3 The reason to protect part of the eastern setting of the Scheduled Ancient Monument should be added to the reason for designating that area as Local Green Space. This area is already recognised as having potential buried archaeology through its Historic Environmental Record entry (SMR/HER 53768).
- 6.4 The development of housing within the site through a design approach involving a number of small distinct areas that respect the design of the two nearby small courtyards off of a village street should be retained in the policy to achieve development that is sympathetic to the form and density of the Conservation Area character and appearance.
- 6.5 The open setting of the monument along its southern edge is limited in extent but reflects the areas defensive quality as marshland rather more than the Castle's links to what is thought to have been the surrounding agricultural community. The latter, potentially, is stronger in relation to land to the east of the monument with the presence of its fish ponds and possible manorial building. The recommendation in paragraph 6.1 together with the broad analysis set out in Figure 11 should be used to inform the extent of any buffer that would maintain the marshland setting of the Castle. This does not necessarily require development to be resisted within the zone identified as the 'extent of the open setting' but a more detailed assessment should be undertaken to show how this aspect might be suitably addressed. For example, it

may be possible for land further away from the monument but within that zone to be developed in a particular way. An alternative would be to utilise some of this area as part of any SUDs drainage scheme.

7. Conclusion on Appropriateness of the Proposed Housing Site

7.1 This Heritage Impact Assessment has been produced for the purposes of determining whether a site might be developable in principle such that it can be included in Dilwyn NDP with appropriate policy requirements that would avoid any significant adverse effect upon the significance of heritage assets. The principle asset is Dilwyn Castle Moated Mound Scheduled Ancient Monument, including its setting. Other assets include the contributory heritage aspects to the character and appearance of Dilwyn Conservation Area³, the areas to the east comprising the historic fish ponds and possible platforms (SMR/HER 53768), and the possibility of there being buried archaeology in the north-east corner of the proposed housing site.

7.2 It is considered that the site is capable of development in principle for the anticipated level of development described in the NDP, given the site's size which would allow appropriate protection for the setting of the Dilwyn Castle Moated Mound Scheduled Ancient Monument and ensure an area that might contain buried archaeology is investigated and appropriate action taken in relation to any findings, including restricting development upon it. In terms of the NDP these two matters should be covered by appropriate criteria within the policy setting out development guidelines for the site. Section 6 above sets out these and a number of other matters that need to be reinforced within relevant policies and justifications within the draft NDP.

7.3 Changes to Policy DW4

1. Amend 'design principles' to read 'development principles'

2. Add the following development principle:

- **Any development proposal should be accompanied by a full archaeological investigation agreed with Herefordshire Council's Archaeological Service and in the event of significant and/or extensive remains being found they should be preserved in-situ wherever possible.**

3. Amend criterion vi) to read:

- **A Heritage Impact Assessment should be prepared to inform the location and design of development within the site, including landscaping and the definition of open space, in order to safeguard any significant and/or extensive archaeological remains and to protect the open aspect of that part of Dilwyn Castle Moated Mound which contributes to its setting.**

7.4 Change to paragraph 5.10

1. Add at the beginning of the paragraph:

'The site does not impinge directly on Dilwyn Castle Moated Mound Scheduled Ancient Monument although may have some effect upon its setting which should

³ NB there may be other aspects of the Conservation Area that need to be considered but they would be considered under other analysis. This particular aspect is that which is relevant to a Heritage Impact Assessment.

be minimised through avoiding development where this is most sensitive. In addition, there is the possibility that buried archaeology may be present in the north-east corner of the site. A Heritage Impact Assessment to determine whether the site might be developed in principle has concluded that the effects of development should be capable of mitigation and the site is of sufficient size to enable the anticipated level of development to take place. However, a more detailed assessment will be required in order to comply with relevant criteria in this policy and that would also comply with the requirements of policy DW7.'

- 7.5 Change to the description of the importance of Court Orchard leading to its designation as Local Green Space in paragraph 6.7.
- Court Orchard is the field adjacent to Castle Mound. The land parcel has a HER Number SMR No. 53768 and is identified as 'a small earthwork forming a possible small moated site, sub-square' and hence of archaeological interest. In addition, it overlooks Dilwyn Castle Moated Mound Scheduled Ancient Monument forming part of that monument's historical setting, reflecting the strong connection of the Castle and its associated fish ponds with the agricultural community that was understood to form the nearby settlement.

Appendix 1: Extract from Dilwyn Regulation 14 Draft NDP

Policy DW4: Development Principles for Land to the south-west of Orchard Close and Castle Mound

The following design principles shall be applied to land to the south-west of Orchard Close and Castle Mound:

- i) Housing shall comprise areas set off of a main 'village street' within small courtyards reflecting the form and massing of adjacent housing at Orchard Close and Castle Mound.**
- ii) Each area shall have a specific identity based upon local building characteristics but tied together through landscape and layout. Building materials and or design features within each area shall be consistent and vary between areas, but without jarring.**
- iii) The materials, scale, height, massing and proportions of dwellings should reflect those within the village, and all should incorporate locally distinctive features.**
- iv) Provision should be made for a combination of 2 and 3-bedroom properties both detached and semi-detached, with only limited numbers of 4-bedroom houses; an element of affordable housing to meet local needs, in particular those for shared ownership and reduced open market value; social rented accommodation; and housing to meet the needs of elderly people and those with mobility issues.**
- v) A full and detailed landscape scheme will be required to ensure the development fits sensitively into the setting of the village. This should include areas of significant tree planting utilising native species.**
- vi) Structural landscaping at the north-east end of the site should be used to protect the setting of Castle Mound Scheduled ancient monument.**
- vii) The amenity of dwellings running along the north edge of the site should be protected.**
- viii) The removal of any hedgerow should be kept to a minimum and compensatory measures undertaken to replace the biodiversity value of any lost. The landscaping scheme should increase the biodiversity on the site in order to result in net gains.**
- ix) The site should provide a mixture of housing sites, with an emphasis on family housing with the appropriate proportion of affordable housing to meet local needs.**
- x) Off-site measures should be provided to slow vehicles entering the village from the south-west, with the aim of achieving this sufficiently to meet the criteria for a 20mph zone to be established through the village.**
- xi) A footpath within the development should enable pedestrians to reach the northern edge of the site within the development site, protected from the road by the existing hedgerow.**

- Community input - Dilwyn Questionnaire, especially question 9.
- Supporting Objectives 1, 4, 5 and 6
- Supports Herefordshire Local Plan Core Strategy Policies H3, MT1 and SD1 and through enabling a range of house types, including affordable housing.

- 5.8 The development principles are to ensure the site fits sensitively into the setting of the village and addresses site specific issues. The latter includes protecting the residential amenity of adjacent dwellings and the setting of the adjacent Scheduled Ancient Monument, while maintaining and enhancing biodiversity and providing for the safety of pedestrians, including for the short stretch where there is no footpath before joining that just past Orchard Close. One particular aspect of the design is to break the development up into design compartments which reflect smaller developments seen elsewhere in the village even though it is one large site. Through this the community's desire to see small-scale developments will be reflected through design even though the actual scale of development is larger than wished for. The provision of a variety of family and other housing, with an element of affordable dwellings, would not be achievable through an approach based on very small sites.
- 5.9 Regard should be had to Herefordshire Local Housing Market Assessment 2012 Update for the Leominster Housing Market Area or any further update, up to date housing needs evidence and approvals and completions which provide guidance upon the proportion of dwellings of various sizes. The developer should, within their Design and Access Statements, indicate how they propose to contribute towards the needs identified, particularly in terms of house size. Departure from proportional needs may be accepted where development provides especially for local community needs such as housing for the elderly or starter homes. The developer may also wish to consider Providing property that enables people to work from home, where this will not affect the amenity of adjacent properties, and provision of plots for self-build dwellings.
- 5.10 Other policies in this plan address issues such as car parking. Housing proposals should comply with other policies set out within this NDP where appropriate. Development should especially address the need to be sympathetic to the village's form, character and setting, especially as it sits within a conservation area; to ensure that natural features and important spaces are protected; and the appropriate provision for parking so that it does not detract from local amenity.

Appendix 2: Description of Dilwyn Castle Moated Mound (extract from Herefordshire Council's Historic Environment Record)

SMR Number: 2238

Grid Reference: SO 4155 5441

Parish: DILWYN, HEREFORDSHIRE

Though suggestive of castle site work appears rather to be of homestead moat class. (1)

Moat, partly wet, encloses nearly circular area c165' diameter rising slightly above surrounding ground with remains of rampart. Immediately SE pond of irregular form. (2)

Possible ringwork. (3)

Appears to be ringwork with reduced remains of encircling bank on N side of featureless interior. Ditch waterfilled on E and S, but N side filled in and only slight depression indicates position irregular pond does not appear to be contemporary. Watching brief by J Sawle on trenches just outside area of ditch (5)

Motte & bailey. Partly banked on uphill side. Large shell keep is indicated by buried foundations 5'-6' thick. Slightly off centre inside shell is large roughly rectangular block of buried masonry possible a stone keep. Most of upper bailey has been covered with houses apparently without any record being made of site. An old excavated trench on motte, whose report found no stonework stopped only 18" from foundations. Site protected by a marsh, mere & fishponds on two thirds of circuit, now mostly drained. (6)

The author was on site to examine the builder's excavations and foundation trenches throughout the development. Finds were retrieved from the site including probable 12th century pottery. After the development there remains the partial ringwork bank on a mound. Historical information is included in the account with reference to those that held the land from 1086. Comment and speculation on the present evidence includes the possibility that Dilwyn was one of the few stone square or rectangular keeps in Herefordshire. The tower might have been surrounded by a shell-wall built up behind the rampart. Indicating a very strong castle, although there is no conclusive proof of this. Discussion is also included of the possible destruction of the site when the fee holding moved from the castle sometime after 1200. (7)

Since the visit in 1993 houses have been built near the base of the motte, gardens have encroached onto the motte slopes and the tower keep platform is less clear due to soil build up. (8)

Monument Type(s)

1. RINGWORK (Medieval - 1066 AD to 1539 AD)
2. CASTLE (Medieval - 1066 AD to 1539 AD)
3. MOTTE AND BAILEY (Medieval - 1066 AD to 1539 AD)

Associated Files

Sources and Further Reading

1. <6> SHE12725 - Article in serial: Stirling-Brown, R. 1988. Preliminary Results of Castle Survey. Herefordshire Archaeological News. 50, 41.
2. <7> SHE15439 - Serial: Anon. 1993. Herefordshire Archaeological News No. 60. Woolhope Club Archaeological Research Section. 60. Pages 50.
3. <8> SHE16512 - Article in serial: Stirling-Brown, Roger. 2005. Field meeting to Dilwyn and Little Dilwyn: Herefordshire Archaeological News. Newsletter of the Archaeology Research Section of the Woolhope Club. 76. 39-50.
4. <1> SHE2235 - Bibliographic reference: Walters, H B. 1908. Romano-British Herefordshire (pp 167-199). The Victoria History of the County of Hereford edited by William Page, Vol I. I,249.
5. <2> SHE267 - Bibliographic reference: Royal Commission on Historical Monuments. 1934. Inventory of Monuments, Herefordshire North-West, Vol III. Herefordshire North-West, Vol III. III. Pages 39.
6. <4> SHE7796 - Bibliographic reference: Ordnance Survey Record Card. 1972. SO45SW12. Ordnance Survey.
7. <5> SHE9561 - Bibliographic reference: JS. 1979. SMR file.
8. <3> SHE9685 - Bibliographic reference: King; Alcock. 1966. Chateau Gaillard. 3,116.

Protected status

1. Scheduled Monument 170: Moated mound S of church
2. Conservation Area: Dilwyn

Associated Historic Landscape Character Records

1. HHE653 - Small Compass Enclosure of the Landscape - Reconfiguration of Former Common Arable Fields

Appendix 3: Extract from draft Dilwyn Conservation Area Appraisal – July 2006 (Herefordshire Council; extracts relating to the area containing Dilwyn Castle Moated Mound).

“Summary of Special Interest

Dilwyn Conservation Area includes the village of Dilwyn and the rural area that immediately surrounds the village on the north, east and west sides. Settlement and agricultural activities in this area date to at least the 11th Century.

The parish church and castle earthworks date to around the 12th Century. At this time the settlement developed as a cluster of tofts and closes between the church and the castle. Medieval open fields divided into long narrow furlongs surrounded the settlement, with meadowland to the north. There is no clear evidence that a planned medieval town, with a market place and burgage plots, was established here. For much of its history, Dilwyn has existed as a farming community.

Today, a significant number of timber-framed buildings dating to between the 14th and 17th Century survive and continue to be used as domestic dwellings. All have been altered or adapted in some way, including infilling or refronting in brick, extending or enlarging. A number of former agricultural buildings have more recently been adapted to use as dwellings. During the 18th Century, Classical (Georgian) influence in building design and construction is evident, particularly in the remodelling or rebuilding of earlier timber-framed buildings with brick and render. Further development took place in the 19th Century with the construction of domestic and institutional buildings using brick and local sandstone. A significant number of new homes were built during the 20th Century, particularly on the east and south sides of the village.

Changes in agricultural methods and practice are evident, particularly since the parliamentary enclosure of medieval open fields in the 18th and 19th Century. Also, improved drainage systems have resulted in the adaptation of meadowland to arable. More recently, a number of field boundaries have been removed to create larger arable fields. Redundant farm buildings have been converted to domestic use. Heritage assets within the conservation area include fifteen Listed Buildings, i.e., one Grade I building and fourteen Grade II buildings or structures, and one Scheduled Monument. Ten unlisted buildings are identified as buildings of local interest. The Scheduled Monument is deemed to be at risk.

Today, all of these buildings and structures, together with the area’s mature trees and hedgerows, walls, gardens, open spaces and views, contribute to the special architectural and historic character of Dilwyn Conservation Area.”

“Historical Development and Archaeology

The origins of the place name, Dilwyn, are obscure. It has been suggested that the name derives from an Old English form meaning ‘secret place’. Today, the term is also used as a Welsh personal name in which the final element means white or fair (*W: gwyn*).

The Domesday Book of 1086 records that Dilwyn (*Diluēn*) was held by William of Ecouis. The population of the settlement included eight villagers, five smallholders

and one female slave. Not all of the available land was under cultivation at that time; the taxable value had, in fact, gone down since the Norman Conquest when the manor was held by Edwin. This also indicates that the settlement of Dilwyn predates 1066.

Following William of Ecouis, the tenancy was given to Godfrey de Gamages and in the early 13th Century it was held by William de Braose. Later in that century, the manor was divided between several tenants, including the Priory of Wormsley. A moated mound on the south side of the village is now identified as a medieval ringwork castle. The date of construction of the monument, and the identity of the builder, are unknown. It is likely, however, that the site was occupied shortly after the Conquest, and certainly by the 12th Century. At that time, the castle would have been the political and economic centre of the manor of Dilwyn and may have continued as such until the mid-13th Century. Two fishponds within the castle bailey were an important component of the medieval domestic economy, providing fish for household consumption.

The parish church of St Mary dates to c.1200. There is architectural evidence of an earlier church at this location; there is no mention of a priest in the Domesday record, however.

The settlement of Dilwyn is likely to have developed as a small, linear village located between the castle and the church. There is no clear evidence of a planned medieval borough with a market place and burgage plots. It is probable that the village consisted of a cluster of tofts (a small plot with house, outbuildings and garden) and small, enclosed fields, or closes, occupied by smallholders and villagers dependant on the lord of the manor.

Surrounding the village, contemporary field boundaries are indicative of the enclosure of an earlier medieval field system. This would have consisted of large open fields divided into narrow arable strips, or furlongs. Tenants of various ranks would have maintained rights in land in proportion to the services they owed their feudal lord. Meadowland and pasture would have been held in common. On the steep slopes on the west side of the conservation area, medieval (or early postmedieval) field boundaries are marked by lynchets (terraces).

Some aspects of the medieval system of land division persisted into the 19th Century and are recorded by the Tithe Apportionment. On the west side of the conservation area, the large Hill Field was still divided into long, narrow strips under multiple ownership. Also in this area, narrow closes gave evidence of the enclosure of other medieval furlongs. In the northern part of the conservation area, several field names contained the element 'meadow'. This may be indicative of common holdings on seasonally waterlogged land."

"Spatial Analysis

There are a number of prominent open spaces within the settlement boundary (among others):

- On the south side of the conservation area: a field (private) containing earthwork remains of the castle bailey and the site of a fishpond; to the west, earthwork remains of the castle mound and ditch (private) with a dense cover of trees and bushes.

Mature trees are a prominent feature of the conservation area. They are particularly abundant:

- On the steep north-western slopes;

- On both sides of the approach road to the village from the north;
- In the area of the village green;
- On the castle earthworks.”

“Key Views and Vistas

There are a number of key views within the village of Dilwyn, including (among others):

- On entering the village from the south-west (A4112) a sequential view from a weather-boarded barn with corrugated iron roof to a row of red-brick cottages (19th Century), the view deflected to the east by a high red-brick wall, then continuing with The Great House (16th/17th Century, refronted during the 18th Century) on the left (north) and the timber-framed Castle Barn (17th Century) on the right (south), to the chestnut tree at the centre of the village;”

“Character Analysis

The character of Dilwyn Conservation Area is defined to a great extent by a cluster of 17th Century ‘black and white’ timber-framed buildings centred on a village green set within a ‘timeless’ agricultural landscape. The size and plan form of the village core has remained remarkably constant over the course of several hundred years (until the 20th Century), however, there has been significant change in the appearance and use of many of the buildings, and in the methods and organisation of agriculture. The village green is located on the south side of the crossroads at the centre of Dilwyn. This attractive green open space, enclosed by trees, is a focal point of the village. It is a recent innovation, however, and not an historic common. The area is protected under the provisions of the Herefordshire UDP (Policy HBA9, Protection of Open Areas and Green Spaces).

The oldest surviving building is the parish church of St Mary (Grade I). The tower dates to the 12th Century; the church was extended and rebuilt in the late 13th Century with later additions and restoration. The building is constructed of coursed sandstone rubble with ashlar dressings under a slate roof with a shingled spire. The church occupies an imposing position on a terraced slope with sandstone rubble retaining wall overlooking the central area of the village.

Earthworks near the southern end of the conservation area mark the location of a ringwork castle, previously identified as a moated mound (Scheduled Monument). The mound is almost circular, c. 50m in diameter, with traces of a ringwork rampart. Buried stone within the rampart may be the remains of a rectangular keep. The mound is encircled by a ditch. On the east side, there was a bailey surrounded by an embankment, and two fishponds. The monument is no longer prominent in the landscape. The earthworks are eroded and hidden from view by modern housing developments on the north and west sides that encroach upon the site, and by trees and bushes.”

“Issues

Monument at Risk

The moated mound (Scheduled Monument) is at risk as a result of damage that has already been done, and the likelihood of further damage due to:

- (i) Residential development over most of the upper bailey and on the north and west sides of the mound;
- (ii) Vegetation cover, including trees and bushes, over much of the ditch and

the mound, the roots of which are likely to cause damage to buried archaeological deposits.”