

**Latham, James**

---

**From:** Turner, Andrew  
**Sent:** 18 September 2017 15:06  
**To:** Neighbourhood Planning Team  
**Subject:** RE: Shobdon Regulation 16 neighbourhood development plan consultation

**RE: Shobdon Regulation 16 Neighbourhood Development Plan Consultation**

Dear Neighbourhood Planning Team,

I refer to the above and would make the following comments with regard to the above proposed development plan.

It is my understanding that you do not require comment on Core Strategy proposals as part of this consultation or comment on sites which are awaiting or have already been granted planning approval.

Having reviewed Ordnance survey historical plans, I would advise that three of the four 'proposed housing sites' (see below) mentioned in policy S4 identified in brown in the 'Shobdon Village Polices Map' have been historically used as orchards. By way of general advice I would mention that orchards can be subject to agricultural spraying practices which may, in some circumstances, lead to a legacy of contamination and any development should consider this.

- (i) Land to north of Moor Meadow;
- (ii) Land to South of Bar Meadow;
- (iv) Land west of the Paddocks.

Please note, the four proposed housing sites identified on the 'Shobdon Village Polices Map' were not marked with their IDs. It would be useful in the future that the sites on the map are given the IDs; (i) to (iv).

General comments:

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.

These comments are provided on the basis that any other developments would be subject to application through the normal planning process.

Kind regards

Andrew

## Latham, James

---

**From:** Norman Ryan <Ryan.Norman@dwrwymru.com>  
**Sent:** 08 September 2017 11:43  
**To:** Neighbourhood Planning Team  
**Cc:** Evans Rhys  
**Subject:** RE: Shobdon Regulation 16 neighbourhood development plan consultation  
**Attachments:** DCWW consultation response - Shobdon NDP - 10.02.17.pdf

Dear Sir/Madam,

Thank you for consulting Welsh Water on the below resubmission of the Shobdon Regulation 16 Neighbourhood Development Plan.

As you may recall, in our previous Regulation 16 consultation response we raised concerns with regard to the accuracy of some of the statements in the Neighbourhood Plan – I have attached this representation for your information.

I note from the resubmitted Regulation 16 consultation and the Consultation Statement Addendum that the Parish Council have not amended the inaccuracies or taken on board the recommendations as set out in our original Regulation 16 consultation response. Whilst we appreciate that this is the Parish Council's prerogative, we would wish to again refute the inaccuracies along with the assertion in the Consultation Statement Addendum "*...that the issue is not taken seriously by Welsh Water.*"

I can assure you that we take the matter of the hydraulic capacity of our sewerage network seriously, and can confirm that at present there are no issues of hydraulic overload on the sewerage network in Shobdon. Further, we do not envisage there being any issues in the growth proposed in the Neighbourhood Development Plan being accommodated.

Accordingly, please accept our previous Regulation 16 consultation response along with this email as our representation for the current consultation.

If you require any further information then please do not hesitate to contact us.

Kind regards,



**Ryan Norman**  
**Forward Plans Officer | Developer Services | Dwr Cymru Welsh Water**  
Linea | Cardiff | CF3 0LT | T: 0800 917 2652 | [www.dwrcymru.com](http://www.dwrcymru.com)

*We will respond to your email as soon as possible but you should allow up to 10 working days to receive a response. For most of the services we offer we set out the timescales that we work to on our Developer Services section of our website. Just follow this link <http://www.dwrcymru.com/en/Developer-Services.aspx> and select the service you require where you will find more information and guidance notes which should assist you. If you cannot find the information you are looking for then please call us on 0800 917 2652 as we can normally deal with any questions you have during the call.*

*If we've gone the extra mile to provide you with excellent service, let us know. You can nominate an individual or team for a Diolch award through our [website](#).*

---

**From:** Neighbourhood Planning Team [mailto:neighbourhoodplanning@herefordshire.gov.uk]  
**Sent:** 28 July 2017 11:02  
**Subject:** Shobdon Regulation 16 neighbourhood development plan consultation

Shobdon Neighbourhood Plan  
FAO Herefordshire Neighbourhood Planning Team

Enquiries: Rhys Evans/Ryan Norman  
0800 917 2652

Sent via email

10<sup>th</sup> February 2017

Dear Sir/Madam

## **REGULATION 16 PUBLIC CONSULTATION ON SHOBDON NEIGHBOURHOOD PLAN, FEBRUARY 2017**

I refer to your email dated the 9<sup>th</sup> January 2017 regarding the above consultation. Dŵr Cymru Welsh Water (DCWW) appreciates the opportunity to respond and we offer the following representation:

Whilst we were consulted at the Regulation 14 stage of the Shobdon Neighbourhood Development Plan in March 2016 and the Parish Council have taken on board some of our comments, we still maintain concern with specific aspects of the document as they are inaccurate. The specific sections that are refuted as being inaccurate are as follows:

### **Policy S4: Meeting Housing Needs within Shobdon Village**

*“No development shall take place until the capacity of the sewer pipe leading to the village sewage treatment works is increased to accommodate additional development”.*

- There are no hydraulic capacity issues on the length of public sewer running from the field to the south of The Grove to the wastewater treatment works (WwTW).

### **Paragraph 5.6**

*“...However, before any further development can take place measures need to be brought forward to address a constraint in terms of sewerage capacity...”*

- At present, there are no constraints in terms of sewerage capacity in Shobdon. As outlined in our Regulation 14 consultation response, we recommend the addition of the following text to Policy S10, which would protect the sewerage network and WwTW;
  - ***Development that may result in the capacity of the wastewater treatment works (WwTW) and/or the public sewerage network becoming overloaded will not be permitted.***

***In either of these instances, development will need to be phased or delayed until capacity becomes available, either through DCWW regulatory investment or, in advance of this through the developer funding the improvements themselves via the provisions of the Water Industry Act (1991) and/or section 106 of the Town and Country Planning Act (1990).***

### **Paragraph 5.8**

*“In particular, works need to be undertaken to enlarge the sewer in the stretch immediately before the Sewage Treatment Works.”*

- As previously stated, there are no hydraulic capacity issues with this sewer.

### **Paragraph 7.2**

*“The Parish Plan identified drainage problems within the village, in particular, flooding resulting from the sewerage system. It is understood that the issue may still need to be resolved and there is concern that additional development may exacerbate any difficulties. The problem is understood to stem from the installation of temporary pipework put in during the World War 2 and as a consequence, the situation needs at least to be monitored as further developments process. Developer contributions towards appropriate measures should be used to address this issue...”*

- As outlined in our Regulation 14 consultation response, whilst there have been historical incidents of sewer flooding on the public sewerage network, these were not due to hydraulic overload. We will as a matter of course continue to monitor growth within the village, and if there comes a time whereby development would hydraulically overload the sewerage system we would advise the Council accordingly, and would look to either improve the network ourselves or seek developer contributions. However, at the current time there are no issues.

### **Policy S10: Surface and Foul Water Drainage**

*“...Development that may result in the capacity of the Sewage Treatment Works becoming overloaded will not be permitted. Should there be any shortfall in capacity to accommodate development, it will need to be phased or delayed until capacity becomes available. Developments that connect to Shobdon’s main sewer will need to contribute to the upgrading of the sewer pipe between the field to the south of The Grove and the Sewage Treatment Works unless investment by Dwr Cymru Welsh Water has taken place to rectify current problems...”*

- Whilst aspects of this Policy have been amended to take on board recommendations in our Regulation 14 consultation response, it is not wholly accurate. As such, we recommend the suggested wording (under our response to Paragraph 5.6) is included. As aforementioned, there is no hydraulic capacity issue with the sewer leading to the WwTW.

### **Paragraph 7.4**

*“...Similarly, community concerns have been expressed about leakage from the sewerage system and evidence is available to indicate this is a problem. Further development would be expected to exacerbate the sewerage problem...”*

- We are not aware of any issues with regard to leakage from the sewerage system, but as outlined in our Regulation 14 consultation response, our recommended amendments to Policy S10 would future proof against any hydraulic capacity concerns.

Should you require any further information please do not hesitate to contact us at [Forward.Plans@dwrwymru.com](mailto:Forward.Plans@dwrwymru.com) or via telephone on 0800 917 2652.

Yours faithfully,

Ryan Norman  
**Forward Plans Officer**  
**Developer Services**

Herefordshire Council  
Neighbourhood Planning  
Plough Lane  
Hereford  
HR4 0XH

**Our ref:** SV/2010/103979/AP-  
79/PO1-L01

**Your ref:**

**Date:** 12 September 2017

**F.A.O: Mr. J Latham**

Dear Sir

### **SHOBDON REGULATION 16 NEIGHBOURHOOD PLAN**

I refer to your email of the 28 July 2017 in relation to the above Neighbourhood Plan (NP) consultation. We have reviewed the submitted document and would offer the following comments at this time.

As part of the recently adopted Herefordshire Council Core Strategy updates were made to both the Strategic Flood Risk Assessment (SFRA) and Water Cycle Strategy (WCS). This evidence base ensured that the proposed development in Hereford City, and other strategic sites (Market Towns), was viable and achievable. The updated evidence base did not extend to Rural Parishes at the 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.

As there are no specific sites allocated within areas of flooding would offer no bespoke comments at this time.

I trust the above is of assistance at this time. Please can you also copy in any future correspondence

Yours faithfully

**Mr. Graeme Irwin**  
**Senior Planning Advisor**  
Direct dial: 02030 251624  
Direct e-mail: [graeme.irwin@environment-agency.gov.uk](mailto:graeme.irwin@environment-agency.gov.uk)

Environment Agency  
Hafren House, Welshpool Road, Shelton, Shropshire, Shrewsbury, SY3 8BB.  
Customer services line: 03708 506 506  
[www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)  
End

Neighbourhood Planning Team,  
Plough Lane,  
Hereford  
HR4 0LE  
By email only to: [neighbourhoodplanning@herefordshire.gov.uk](mailto:neighbourhoodplanning@herefordshire.gov.uk)

## **Introduction**

This letter provides Gladman Developments Ltd (Gladman) representations in response to the second submission version of the Shobdon Neighbourhood Plan (SNP) under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012. Noting the previous submission version of the plan was withdrawn to enable further site assessment work to be undertaken to strengthen the plans evidence base prior to this additional Regulation 16 consultation, Gladman have seen no evidence of such site assessment work being completed. As such the plan is still not supported by a robust, proportionate evidence base and should still not proceed to examination.

## **Legal Requirements**

Before a neighbourhood plan can proceed to referendum it must be tested against a set of basic conditions set out in paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended). The basic conditions that the SNP must meet are as follows:

- (a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order.*
- (d) The making of the order contributes to the achievement of sustainable development.*
- (e) The making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).*
- (f) The making of the order does not breach, and is otherwise compatible with, EU obligations.*

## **National Planning Policy Framework and Planning Practice Guidance**

The National Planning Policy Framework (the Framework) sets out the Government's planning policies for England and how these are expected to be applied. In doing so it sets out the requirements for the preparation of neighbourhood plans to be in conformity with the strategic priorities for the wider area and the role in which they play in delivering sustainable development to meet development needs.

At the heart of the Framework is a presumption in favour of sustainable development, which should be seen as a golden thread through both plan-making and decision-taking. For plan-making this means that plan makers should positively seek opportunities to meet the development needs of their area and Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change. This requirement is applicable to neighbourhood plans.

The recent Planning Practice Guidance (PPG) updates make clear that neighbourhood plans should conform to national policy requirements and take account the latest and most up-to-date evidence of housing needs in order to assist the Council in delivering sustainable development, a neighbourhood plan basic condition.

The application of the presumption in favour of sustainable development will have implications for how communities engage with neighbourhood planning. Paragraph 16 of the Framework makes clear that Qualifying Bodies preparing neighbourhood plans should develop plans that support strategic development needs set out in Local Plans, including policies for housing development and plan positively to support local development.

Paragraph 17 further makes clear that neighbourhood plans should set out a clear and positive vision for the future of the area and policies contained in those plans should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency. Neighbourhood plans should seek to proactively drive and support sustainable economic development to deliver the homes, jobs and thriving local places that the country needs, whilst responding positively to the wider opportunities for growth.

Paragraph 184 of the Framework makes clear that local planning authorities will need to clearly set out their strategic policies to ensure that an up-to-date Local Plan is in place as quickly as possible. The Neighbourhood Plan should ensure that it is aligned with the strategic needs and priorities of the wider area and plan positively to support the delivery of sustainable growth opportunities.

### **Planning Practice Guidance**

It is clear from the requirements of the Framework that neighbourhood plans should be prepared in conformity with the strategic requirements for the wider area as confirmed in an adopted development plan. The requirements of the Framework have now been supplemented by the publication of Planning Practice Guidance (PPG).

On 11th February 2016, the Secretary of State (SoS) published a series of updates to the neighbourhood planning chapter of the PPG. In summary, these update a number of component parts of the evidence base that are required to support an emerging neighbourhood plan. In particular, the changes to the PPG stress the importance of considering housing reserve sites, and providing indicative delivery timetables to ensure that emerging evidence of housing needs is addressed to help minimise any potential conflicts that can arise and are not overridden by a new Local Plan.

On 19th May 2016, the Secretary of State published a further set of updates to the neighbourhood planning PPG. These updates provide further clarity on what measures a qualifying body should take to review the contents of a neighbourhood plan where the evidence base for the plan policy becomes less robust. As such it is considered that where a qualifying body intends to undertake a review of the neighbourhood plan, it should include a policy relating to this intention which includes a detailed explanation outlining the qualifying bodies anticipated timescales in this regard.

Further, the PPG makes clear that neighbourhood plans should not contain policies restricting housing development in settlements or preventing other settlements from being expanded. It is regarding this, Gladman have reservations regarding the SNP's ability to meet basic condition (a); this will be discussed in greater detail throughout this response.

### **Relationship to Local Plan**

To meet the requirements of the Neighbourhood Plan Basic Conditions, neighbourhood plans should be prepared to conform to the strategic policy requirements set out in the adopted Development Plan. The adopted development plan the SNP needs to be in conformity with is the Herefordshire Local Plan Core Strategy 2011-2031. Policy SS2 of the plan sets a target for minimum of 16,500 new homes in Herefordshire between 2011 and 2031 to meet market and

affordable housing need. This policy sets out the broad distribution of the new dwellings in the County, including a minimum of 5,300 dwellings in rural settlements. Policy SS3 sets out the stepped minimum housing targets of the plan period. The Council will monitor the delivery rates to ensure housing need is met and where the figure is below that cumulative target has set out mechanisms that may be adopted in such an event:

- A partial review of the Local Plan – Core Strategy; or
- The preparation of new Development Plan Documents; or
- The preparation of an interim position statement and utilizing evidence from the Strategic Housing Land Availability Assessment to identify additional housing land.

In light of the above, should a review or future Development Plan Documents be required, the SNP will need to ensure that it allows for a sufficient degree of flexibility and adaptability so that it can fully react to changes in the market. This degree of flexibility is required to ensure that the Plan is capable of enduring over its plan period and not ultimately superseded by s38(5) of the Planning and Compulsory Purchase Act 2004, which states that:

*'if to any extent a policy contained in a development plan for an area conflicts with another policy in the development plan the conflict must be resolved in favour of the policy which is contained in the last document to be adopted, approved or published (as the case may be).*

### **Shobdon Neighbourhood Plan**

Having responded to the previous Regulation 16 consultation Gladman are disappointed our suggestions to improve the plan have not been considered further and the evidence base has not been revisited to demonstrate and support the policy choices made within the plan. The issues identified by the Council have still not been resolved and Gladman do not believe the SNP should not proceed to examination.

Gladman still maintain that several of the plans policies do not meet the requirements of the basic conditions and will require further evidence to be produced and modifications of the wording to ensure sufficient flexibility within the plans policies to support sustainable development opportunities. Gladman would like to again draw attention to PPG which states that *'Proportionate, robust evidence should support the choices made and the approach taken. The evidence should be drawn upon to explain succinctly the intention or rationale of the policies in the draft plan...'* Gladman submit that such evidence has not been produced to support several policies within the SNP and consequently do not meet basic condition (a).

### **Policy S1: Promoting a Sustainable Community**

Whilst supporting the overall thrust of this policy Gladman raise concern with the introduction of the phasing of development over the plan period. Gladman object to the phasing of development where this would unnecessarily delay the delivery of sustainable development opportunities and this will be detailed further below setting out why Gladman think this element of the policy should be deleted.

### **Policy S2: Development Strategy**

This policy introduces a settlement boundary around Shobdon, Gladman opposes the use of a settlement boundary if this would preclude otherwise sustainable development coming forward. The Framework is clear that development which is sustainable should go ahead without delay. The use of settlement limits to arbitrarily restrict suitable development from coming forward on the edge of the settlement would not accord with the positive approach to growth required by the Framework and would be contrary to basic condition (a).

Gladman suggest for greater accordance with the Framework and to meet basic condition (a) flexibility should be added to the policy wording that demonstrably sustainable development adjacent to the settlement boundary would be supported. This would help ensure the longevity of this policy within the plan and help adapt to any rapid market changes resulting in additional housing needs in the Kington Housing Market Area.

The policy goes on to again reference the phasing of development, stating that development should come forward at intervals during the plan period as infrastructure constraints determine. It is not clear what these infrastructure constraints are or who would be responsible for delivering infrastructure works nor how this policy could be applied predictably and with confidence.

#### **Policy S4: Meeting Housing Needs within Shobdon Village**

This policy seeks to allocate small sites for new housing within the settlement boundary. Gladman raise concerns regarding the lack of site assessment to support the inclusion of site allocations. Without a site assessment to consider the sustainability merits and whether the proposed sites are suitable, achievable, and available, allocations should not be progressed within the plan. The Council submitted a detailed response to the previous Regulation 16 consultation setting out its deliverability concerns with several the allocations in the plan and Gladman note that many of these allocations remain within the plan. It is likely that had a detailed site assessment been undertaken the Parish Council would meet the same conclusions as the Council in regards the deliverability of the sites proposed. Whilst noting that the Council recommended that the plan should undergo a second Regulation 16 consultation once the work suggested had been undertaken we have seen no evidence of this work being completed and suggest that to enable fair consultation for interested parties and stakeholders this evidence should be subject to a further Regulation 14 consultation, not proceeding straight to submission of the plan.

Having considered the SEA to inform the plan making process and the site selection Gladman are concerned at the lack of consideration of 'reasonable alternatives' to the policy decisions and specifically the site selection. To satisfy the European obligations of the SNP once the site assessment work has been undertaken the sustainability merits of the sites proposed and rejected should be assessed in the same level of detail and the decisions made should be justified and transparent. The rejected sites could then be assessed as a reasonable alternative to the preferred approach. Having seen no evidence of the site selection process the site allocations currently appear to be personal preference rather than being supported by robust evidence.

Further, this policy seeks to restrict any development taking place until improvements have been made to sewerage works. This is a matter for the local infrastructure body to undertake and sustainable development should not be delayed due to something beyond the control of a developer. Indeed, as PPG states '*qualifying bodies should engage infrastructure providers... in this process, advised by the local planning authority.*' An unnecessarily restrictive delay would not accord with the Framework and would therefore conflict with basic condition (a). Welsh Water submitted representations to the previous consultation of the plan stating that there are currently no capacity issues with the sewerage infrastructure and as such this is considered an unnecessary restriction on development.

#### **Policy S5: Phasing of Development**

This policy seeks to introduce a phasing of development of around 15 dwellings in every five-year period. This does not accord with the objectives of the Framework to significantly boost the supply of housing and should not be used as a mechanism to restrict otherwise sustainable development. The issues of phasing of development has been considered before in the Wellington Neighbourhood Plan Examiner's report. The examiner recommended the deletion of the phasing aspect of a policy within the plan as it could have the effect of restricting development and represented an inappropriate constrained approach to sustainable development that may potentially be proposed during the plan period. The wording of the policy was considered in conflict with the presumption in favour of sustainable

development in the Framework. Further, there was no clear mechanism to implement the phasing aspect of the policy. It is for these reasons we suggest this policy is deleted and all references to phasing elsewhere in the plans policies.

## **Conclusions**

Gladman recognise the role of neighbourhood plans as a tool for local people to shape the development of their local community. However, it is clear from national guidance that these must be consistent with national planning policy and the strategic requirements for the wider authority area. Through this consultation response, Gladman have sought to clarify the relation of the SNP as currently proposed with the requirements of national planning policy and the wider strategic policies for the wider area.

Gladman are concerned that the plan in its current form does not fully comply with basic condition (a) as the plan is considered not to follow national policy and guidance as the plan contains many policies without the necessary proportionate, robust evidence to do so.

Gladman hopes you have found these representations helpful and constructive. If you have any questions do not hesitate to contact me or one of the Gladman team.

Yours faithfully,

Richard Agnew  
Gladman Developments Ltd  
r.agnew@gladman.co.uk

My Ref: TAR-022-M/JJ/001

Your Ref:

Date: 15<sup>th</sup> September 2017

Neighbourhood Planning Team  
Herefordshire Council  
Plough Lane  
Hereford  
HR4 0LE

[Sent via email to neighbourhoodplanning@herefordshire.gov.uk](mailto:neighbourhoodplanning@herefordshire.gov.uk)

Dear Sir/Madam,

## **SHOBDON NEIGHBOURHOOD DEVELOPMENT PLAN – REGULATION 16 PLAN RE-SUBMISSION STAGE CONSULTATION**

### **REPRESENTATIONS ON BEHALF OF TARMAC TRADING LTD**

We are writing on behalf of our clients Tarmac Trading Ltd (Tarmac) who have a mineral interest within the Neighbourhood Plan area - Shobdon Quarry. Although the quarry has been mothballed for a number of years, there are significant mineral reserves remaining with the potential to be worked within the Neighbourhood Plan period.

We have previously made comment on a number of points within the Submission Draft Neighbourhood Development Plan, and we now write in order to comment on the content of the latest version of the Neighbourhood Development Plan as re-submitted to Herefordshire Council on 19<sup>th</sup> July 2017. The points of relevance to Tarmac are discussed below:

#### Neighbourhood Development Plan Objectives

Overall Tarmac support the principle of growth and maintaining employment and enterprise opportunities within the Neighbourhood Plan area. This is specifically addressed at Objective Three of the Neighbourhood Development Plan. The growth objective of the Neighbourhood Development Plan is in accordance with the

9 The Square, Keyworth, Nottingham, NG12 5JT  
Tel 0115 937 5552 email [joel@heatonplanning.co.uk](mailto:joel@heatonplanning.co.uk)

Development Plan for Herefordshire and the National Planning Policy Framework (NPPF). Employment development and sustainable growth within the Parish will have a significant call on local mineral reserves and the importance of local mineral supply should be safeguarded.

#### Policy S1: Promoting a Sustainable Community

Policy S1 supports the rural economy and the diversification of business and employment opportunities, and directly addresses development opportunities at Shobdon Airfield - which is adjacent to Tarmac mineral interests in the south of the Parish. Whilst Tarmac support opportunities for business and enterprise at the Airfield, it should be ensured within the Neighbourhood Development Plan that proposed development does not prejudice potential future mineral working by reason of sterilisation of workable mineral resource as well as siting non compatible development in proximity to one another.

Mineral reserves are finite and can only be worked where the mineral is found. The Neighbourhood Development Plan should include at Policy S1 wording to ensure that non-minerals development at the Airfield would not unduly sterilise mineral reserves in close proximity. This would reflect the 'great weight' afforded to minerals supply, and the need to safeguard known resources in accordance with paragraph 143 and 144 of the NPPF

Policy S1 states that business and employment opportunities at Shobdon Airfield are supported "including at Shobdon Airfield provided the operations do not adversely affect village amenity, in particular through noise and traffic". The policy should reflect the need for Planning Applications to be accompanied by Environmental Impact Assessment which would assess the level of any potential adverse impact and provide mitigation measures if required.

#### Policy S2: Development Strategy

Policy S2 promotes the use of Shobdon Airfield as an aerodrome, for recreation and employment activities. This policy should recognise and consider the potential impact on possible future mineral operations, as with Policy S1 above.

#### Policy S8: Supporting Local Business

The preamble to Policy S8 states that "agricultural activities surround the airfield". Reference should be made to include the former Shobdon Quarry workings.

Policy S8 supports 'redevelopment with an element of live work units'. The principle of this is supported, However, as per our comments above, recognition should be

given to the potential for mineral workings to ensure there are no conflicts of land use.

Policy S8 lists criteria considered 'crucial' in determining whether development is considered sustainable. The Policy is negatively worded with a focus on development giving rise to adverse environmental impact. In accordance with the NPPF and the principles of sustainable development, there is a balance to be struck between potential adverse environmental impact and the social and economic benefits generated by the need for a development. Planning Applications will need to be considered on their merits and this includes balancing a need for development against any potential adverse impact and mitigation as required.

Point 6 of Policy S8 refers to 'no detrimental effect' upon the local highway network. It is suggested that this would benefit from rewording to 'not give rise to unacceptable impact upon the highway network' to provide a quantifiable measure that will be assessed by the Highway Authority as part of the consideration of any potential future Planning Applications.

Point seven of Policy S8 states that "potential polluting effects of any enterprise should be fully mitigated, and where they cannot, permission will be refused". Whilst it is accepted that polluting impacts should be avoided, it would be for assessment work as part of any Planning Application to determine the extent of impact and whether the level of impact is unacceptable in planning and environmental terms. The policy should be reworded to state, 'potential polluting effects of any enterprise should be minimised and mitigation imposed where necessary'.

Paragraph 6.5 makes reference to 'increased noise and excessively high levels of traffic'. These should be quantified to make them useful planning tools. We would suggest the reference to noise levels is in context of impact upon amenity. As per our comments above, 'excessively high levels of traffic' should be reworded to 'unacceptable impact upon the highway network' to enable the impact to be measured/quantified.

#### Policy S14: Retaining the Natural Environment and Landscape

In accordance with paragraph 109 of the NPPF, planning applications or new development should 'minimise impact upon biodiversity and provide net gains where possible'. The potential for effect upon wildlife habitat will be judged upon the significance of the asset that is affected. Whilst it is desirable for the Parish to ensure development proposals 'enhance the nature conservation value of areas', this may not be appropriate in all cases when balancing the need for the development and the

longer term wishes/aspirations of the landowner. It is suggested in accordance with paragraph 118 of the NPPF that item (f) and (g) be replaced and for development proposals to, 'conserve and where possible enhance biodiversity'.

I trust that these comments are helpful. Should you wish to discuss in more detail, please do not hesitate to contact us.

Kind regards,

Joel Jessup  
**Heaton Planning Ltd**

**9 The Square, Keyworth, Nottingham, NG12 5JT**  
**Tel 0115 937 5552 email [joel@heatonplanning.co.uk](mailto:joel@heatonplanning.co.uk)**



Historic England

WEST MIDLANDS OFFICE

Mr James Latham  
Herefordshire Council  
Neighbourhood Planning & Strategic Planning  
Planning Services, PO Box 230, Blueschool House  
Blueschool Street  
Hereford  
HR1 2ZB

Direct Dial: 0121 625 6887

Our ref: PL00058469

24 August 2017

Dear Mr Latham

**SHOBDON NEIGHBOURHOOD PLAN- REGULATION 16 RECONSULTATION.**

Thank you for the invitation to comment further on the Shobdon Neighbourhood Plan. Our previous substantive Regulation 16 comments remain entirely relevant, that is:

*“Historic England are supportive of the Vision and objectives set out in the Plan and the content of the document, particularly its’ emphasis on local distinctiveness including undesignated heritage assets and the maintenance of historic rural character. We commend the recognition of the importance of archaeological remains and share the view that the heritage significance of Shobdon Airfield should be carefully considered should development proposals come forward.*

*Overall the plan reads as a well-considered, concise and fit for purpose document which we consider takes a suitably proportionate approach to the historic environment of the Parish.*

*Beyond those observations we have no further substantive comments to make on what Historic England considers is a good example of community led planning”.*

I hope you find this advice helpful. If you have any queries please do not hesitate to contact me.

Yours sincerely,

Peter Boland  
Historic Places Advisor  
peter.boland@HistoricEngland.org.uk

cc:



THE AXIS 10 HOLLIDAY STREET BIRMINGHAM B1 1TG

Telephone 0121 625 6870  
HistoricEngland.org.uk



## Latham, James

---

**From:** Ian Craig  
**Sent:** 13 September 2017 16:26  
**To:** Banks, Samantha  
**Cc:** Simon Morris  
**Subject:** Re: Shobdon Neighbourhood Development Plan - Objection to Local Green Space  
**Attachments:** Land Registry Document for Woodside, Shobdon.pdf

**Importance:** High

Hello Samantha,

Further to our contact with your office, we wish to formally lodge our objection today (13<sup>th</sup> September 2017) to the allocation of Local Green Space on our property and land under this latest plan submitted by the Parish Council.

Our property is the area of land called Woodside and it runs SW along the North side of the B4362 from the bridge opposite the Bateman Arms pub to the top of the bank, where the old school house is located.

Our points of objection are:

- It passes over our existing dwellings and gardens.
- It is not a recreational or public area for the village
- It is part of an extensive tract of land.
- It is not parkland

We also would point out that in these latest plans that the Settlement boundary has been moved from its original plans of which we have a copy back in 2002( Unitary Authority), so that one of the other existing buildings on the land is now interestingly enough put outside of that area for possible re development.

There has been no attempt by the Parish council under submission of this latest plan to contact, consult or advise us of their intentions and this we find most concerning.

The Parrish Council did not contact, consult or advise the previous owners when green space was allocated to this area previously, again this has to be seen as most concerning, as this was imposed by them some 15 years ago.

In general we do question what the true drivers are here.

Our property details are:

Land Registry Title Number	-	HE34806
Property	-	Woodside, Shobdon, Leominster HR6 9NL
Registered proprietor's	-	Simon J Morris Ian D Craig

We now look forward to receiving your comments in due course.

Many thanks.

Best regards

*Ian*



# **REPRESENTATIONS TO THE PUBLIC CONSULTATION DRAFT REGULATION 16 PLAN**

## **RESUBMISSION STAGE SHOBDON NEIGHBOURHOOD DEVELOPMENT PLAN 2011-2031**

**LAND EAST OF THE PADDOCKS  
PRESTEIGNE ROAD  
SHOBDON  
LEOMINSTER  
HEREFORDSHIRE  
HR6 9NQ**

**ON BEHALF OF**

**The Humbers Farm Partnership  
c/o The Agent  
John Amos & Co**

**Date: 12<sup>th</sup> September 2017**

Prepared by

**johnamos  
& co**

Lion Court, Broad Street  
Leominster, Herefordshire, HR6 8LE  
Tel: 01568 610007

## **INTRODUCTION**

John Amos & Co has been instructed to submit representations to the Neighbourhood Plan Regulation 16 Resubmission Consultation Draft on behalf of our clients who own the above land.

Our clients welcome the Parish's decision to allocate their site as a proposed housing site under Policy S4.

## **PAGE 18**

Our client respectfully requests some small alterations to the narrative dealing with their site at paragraph 5.7 at page 18 of the draft Plan. In the first sentence, my clients would request that the description includes the following addition "This site represents part of an area also indicating as having low/minor constraints ...".

Our client asks that the following sentence is removed:-

"In addition, the site is close to Shobdon Pools which is a special wildlife site, having been downgraded from the previous status as a special scientific interest." The reason for the client's request is that the SHLAA site (HLAA/148/002) lies approximately 250 metres south of the Shobdon Pools and the allocated site lies 437 metres south. Accordingly, the statement that the site is close to the Pools is not accurate. This is in the context of the fact that a developed busy holiday homes park and golf course intervene between both the larger SHLAA site and the allocated site and the SWS boundary.

## **POLICY S5**

Our client also wishes to make a representation objecting to Policy S5 of the resubmitted Regulation 16 version of the plan on the grounds that the policy proposes a phased approach to development.

National Policy seeks to boost significantly the supply of housing with a presumption in favour of sustainable development.

The Phasing policy (S5) as contained within this NDP does not help to increase the supply of housing and acts as a hindrance to the delivery of new homes. Limiting phasing to an exact figure is too detailed, too inflexible, is in conflict with the presumption in favour of sustainable development and would be difficult to enforce as build rates vary with planning consent rates.

Policy S5 is overly onerous on developers and will hamper development. Two of the NDP allocated sites (10 units each) are capable of accommodating more than 15 dwellings and it will not be viable for developers to part build sites and wait for the following phasing period before completion. This will inhibit development, prevent the market from working efficiently and conflicts with the need for plans to be positively prepared.

The phasing policy is putting an unreasonable cap on development and it is therefore suggested that this policy is removed and the market be left to deliver houses when they have the confidence in the local market.

The Plans justification for this phasing policy relates to the lack of capacity within local infrastructure (primary school, sewers, treatment works etc.). All future applications, regardless of the phasing policy, will need to robustly demonstrate to the satisfaction of the Council and statutory Agencies that future developments can be accommodated locally. A phasing policy is not required as part of this.

In addition, Welsh Water have stated both through the Regulation 14 and 16 Consultations that there are no constraints in terms of the sewerage capacity in Shobdon. As a result, there is no need for a phasing policy with respect to infrastructure capacity concerns as detailed in the NDP.

It is noted that the issue of phasing of development has been considered before in the Wellington Neighbourhood Plan Examiner's report. The Examiner recommended the deletion of the phasing aspect of a policy within the plan as it could have the effect of restricting development and represented an inappropriate constrained approach to sustainable development that may potentially be proposed during the plan period.

### **REQUEST**

Could you please notify John Amos & Co of the Local Planning Authority's decision under Regulation 19 in relation to this Neighbourhood Development Plan.

Signed:

.....  
**Mike Harries LLB (Hons)**

John Amos & Co  
Lion Court  
Broad Street  
Leominster HR6 8LE

Dated: 12<sup>th</sup> September 2017

Neighbourhood Planning Team  
Herefordshire Council  
Plough Lane  
Hereford  
HR4 0LE

Robert Deanwood  
Consultant Town Planner

Tel: 01926 439078  
[n.grid@amecfw.com](mailto:n.grid@amecfw.com)

Sent by email to:  
[neighbourhoodplanning@herefordshire.gov.uk](mailto:neighbourhoodplanning@herefordshire.gov.uk)

16 August 2017

Dear Sir / Madam

**Shobdon Neighbourhood Plan Consultation  
SUBMISSION ON BEHALF OF NATIONAL GRID**

National Grid has appointed Amec Foster Wheeler to review and respond to development plan consultations on its behalf. We are instructed by our client to submit the following representation with regards to the above Neighbourhood Plan consultation.

**About National Grid**

National Grid owns and operates the high voltage electricity transmission system in England and Wales and operate the Scottish high voltage transmission system. National Grid also owns and operates the gas transmission system. In the UK, gas leaves the transmission system and enters the distribution networks at high pressure. It is then transported through a number of reducing pressure tiers until it is finally delivered to our customers. National Grid own four of the UK's gas distribution networks and transport gas to 11 million homes, schools and businesses through 81,000 miles of gas pipelines within North West, East of England, West Midlands and North London.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect our assets.

**Specific Comments**

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 the Neighbourhood Plan area.

*Gas Distribution – Low / Medium Pressure*

Whilst there is no implications for National Grid Gas Distribution's Intermediate / High Pressure apparatus, there may however be Low Pressure (LP) / Medium Pressure (MP) Gas Distribution pipes present within proposed development sites. If further information is required in relation to the Gas Distribution network please contact [plantprotection@nationalgrid.com](mailto:plantprotection@nationalgrid.com)

**Key resources / contacts**

National Grid has provided information in relation to electricity and transmission assets via the following internet link:

Gables House  
Kenilworth Road  
Leamington Spa  
Warwickshire CV32 6JX  
United Kingdom  
Tel +44 (0) 1926 439 000  
[amecfw.com](http://amecfw.com)

Amec Foster Wheeler Environment  
& Infrastructure UK Limited  
Registered office:  
Booths Park, Chelford Road, Knutsford,  
Cheshire WA16 8QZ  
Registered in England.  
No. 2190074



<http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/>

The electricity distribution operator in Herefordshire Council is Western Power Distribution. Information regarding the transmission and distribution network can be found at: [www.energynetworks.org.uk](http://www.energynetworks.org.uk)

Please remember to consult National Grid on any Neighbourhood Plan Documents or site-specific proposals that could affect our infrastructure. We would be grateful if you could add our details shown below to your consultation database:

Robert Deanwood  
Consultant Town Planner

[n.grid@amecfw.com](mailto:n.grid@amecfw.com)

Spencer Jefferies  
Development Liaison Officer, National Grid

[box.landandacquisitions@nationalgrid.com](mailto:box.landandacquisitions@nationalgrid.com)

Amec Foster Wheeler E&I UK  
Gables House  
Kenilworth Road  
Leamington Spa  
Warwickshire  
CV32 6JX

National Grid House  
Warwick Technology Park  
Gallows Hill  
Warwick  
CV34 6DA

I hope the above information is useful. If you require any further information please do not hesitate to contact me.

Yours faithfully

[via email]

**Robert Deanwood**  
**Consultant Town Planner**

cc. Spencer Jefferies, National Grid

## Latham, James

---

**From:** Amos, Tom (NE) <Thomas.Amos@naturalengland.org.uk>  
**Sent:** 11 September 2017 12:48  
**To:** Neighbourhood Planning Team  
**Subject:** Shobdon Regulation 16 neighbourhood development plan consultation - Natural England response

**Importance:** High

Dear Mr Latham,

Having considered the final submission version of the Shobdon Neighbourhood Development Plan, Natural England have no further comment to make.  
Thank you for your consultation.

Tom Amos  
Sustainable Development  
West Midlands Team  
Natural England,  
County Hall, Spetchley Road,  
Worcester, WR5 2NP  
Tel: 02080260961

Follow the South Mercia team on Twitter - [@NESouthMercia](#)

[www.gov.uk/natural-england](http://www.gov.uk/natural-england)

We are here to secure a healthy natural environment for people to enjoy, where wildlife is protected and England's traditional landscapes are safeguarded for future generations.

In an effort to reduce Natural England's carbon footprint I will, wherever possible, avoid travelling to meetings and attend via audio, video or web conferencing.

**Natural England offers two chargeable services – The Discretionary Advice Service ([DAS](#)) provides pre-application, pre-determination and post-consent advice on proposals to developers and consultants as well as pre-licensing species advice and pre-assent and consent advice. The Pre-submission Screening Service ([PSS](#)) provides advice for protected species mitigation licence applications.**

**These services help applicants take appropriate account of environmental considerations at an early stage of project development, reduce uncertainty, reduce the risk of delay and added cost at a later stage, whilst securing good results for the natural environment.**

---

**From:** Neighbourhood Planning Team [<mailto:neighbourhoodplanning@herefordshire.gov.uk>]  
**Sent:** 28 July 2017 11:02  
**Subject:** Shobdon Regulation 16 neighbourhood development plan consultation

Dear Consultee,

Shobdon Parish Council have submitted their Regulation 16 Neighbourhood Development Plan (NDP) to Herefordshire Council for consultation.

## Neighbourhood Development Plan (NDP) – Core Strategy Conformity Assessment

From Herefordshire Council Strategic Planning Team

Name of NDP: Shobdon- Regulation 16 submission version

Date: 04/08/17

<b>Draft Neighbourhood plan policy</b>	<b>Equivalent CS policy(ies) (if appropriate)</b>	<b>In general conformity (Y/N)</b>	<b>Comments</b>
S1- Promoting a Sustainable Community	SS1	Y	
S2- Development Strategy	SS2, RA2	Y	
S3- Highways and Transport Infrastructure	SS4, MT1	Y	
S4- Meeting Housing Needs within Shobdon Village	RA2, H3	Y	
S5- Phasing of Development	SS3	Y	
S6- Provision of Affordable Housing	H1, H2	Y	
S7- Design Criteria for Residential Development	LD1-LD3, SD1-SD3	Y	
S8- Supporting Local Business	E1, E4, RA5, RA6	Y	
S9- Renewable and Low Carbon Energy	SD2	Y	
S10- Surface and Foul Water Drainage	SD3, SD4	Y	
S11- Accessibility to Community Facilities	SC1	Y	It may be helpful to identify and list the existing community facilities that should be afforded protection and maintained.

<b>Draft Neighbourhood plan policy</b>	<b>Equivalent CS policy(ies) (if appropriate)</b>	<b>In general conformity (Y/N)</b>	<b>Comments</b>
S12- Broadband Infrastructure	N/A	Y	
S13- Protection and Provision of Open Space	OS1- OS3	Y	
S14- Retaining the Natural Environment and Landscape	LD1- LD4	Y	
S15- Protecting Local Heritage	LD4	Y	

18 September 2017

Our ref: Shobdon 1

## Shobdon Neighbourhood Plan

Dear Sir/Madam

For your information we have set out some general guidelines that may be useful to you.

### Position Statement

As a water company we have an obligation to provide water supplies and sewage treatment capacity for future development. It is important for us to work collaboratively with Local Planning Authorities to provide relevant assessments of the impacts of future developments. For outline proposals we are able to provide general comments. Once detailed developments and site specific locations are confirmed by local councils, we are able to provide more specific comments and modelling of the network if required. For most developments we do not foresee any particular issues. Where we consider there may be an issue we would discuss in further detail with the Local Planning Authority. We will complete any necessary improvements to provide additional capacity once we have sufficient confidence that a development will go ahead. We do this to avoid making investments on speculative developments to minimise customer bills.

### Sewage Strategy

Once detailed plans are available and we have modelled the additional capacity, in areas where sufficient capacity is not currently available and we have sufficient confidence that developments will be built, we will complete necessary improvements to provide the capacity. We will ensure that our assets have no adverse effect on the environment and that we provide appropriate levels of treatment at each of our sewage treatment works.

### Surface Water and Sewer Flooding

We expect surface water to be managed in line with the Government's Water Strategy, Future Water. The strategy sets out a vision for more effective management of surface water to deal with the dual pressures of climate change and housing development. Surface water needs to be managed sustainably. For new developments we would not expect surface water to be conveyed to our foul or combined sewage system and, where practicable, we support the removal of surface water already connected to foul or combined sewer.

We believe that greater emphasis needs to be paid to consequences of extreme rainfall. In the past, even outside of the flood plain, some properties have been built in natural drainage paths. We request that developers providing sewers on new developments should safely accommodate floods which exceed the design capacity of the sewers.

To encourage developers to consider sustainable drainage, Severn Trent currently offer a 100% discount on the sewerage infrastructure charge if there is no surface water connection and a 75%

discount if there is a surface water connection via a sustainable drainage system. More details can be found on our website

<https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-and-guidance/infrastructure-charges/>

## Water Quality

Good quality river water and groundwater is vital for provision of good quality drinking water. We work closely with the Environment Agency and local farmers to ensure that water quality of supplies are not impacted by our or others operations. The Environment Agency's Source Protection Zone (SPZ) and Safe Guarding Zone policy should provide guidance on development. Any proposals should take into account the principles of the Water Framework Directive and River Basin Management Plan for the Severn River basin unit as prepared by the Environment Agency.

## Water Supply

When specific detail of planned development location and sizes are available a site specific assessment of the capacity of our water supply network could be made. Any assessment will involve carrying out a network analysis exercise to investigate any potential impacts.

We would not anticipate capacity problems within the urban areas of our network, any issues can be addressed through reinforcing our network. However, the ability to support significant development in the rural areas is likely to have a greater impact and require greater reinforcement to accommodate greater demands.

## Water Efficiency

Part G of Building Regulations specify that new homes must consume no more than 125 litres of water per person per day. We recommend that you consider taking an approach of installing specifically designed water efficient fittings in all areas of the property rather than focus on the overall consumption of the property. This should help to achieve a lower overall consumption than the maximum volume specified in the Building Regulations.

We recommend that in all cases you consider:

- Single flush siphon toilet cistern and those with a flush volume of 4 litres.
- Showers designed to operate efficiently and with a maximum flow rate of 8 litres per minute.
- Hand wash basin taps with low flow rates of 4 litres or less.
- Water butts for external use in properties with gardens.

To further encourage developers to act sustainably Severn Trent currently offer a 100% discount on the clean water infrastructure charge if properties are built so consumption per person is 110 litres per person per day or less. More details can be found on our website

<https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-and-guidance/infrastructure-charges/>

We would encourage you to impose the expectation on developers that properties are built to the optional requirement in Building Regulations of 110 litres of water per person per day.

We hope this information has been useful to you and we look forward in hearing from you in the near future.

Yours sincerely

Daryl Fossick

Growth and Water Efficiency Advisor

[growth.development@severntrent.co.uk](mailto:growth.development@severntrent.co.uk)

## Latham, James

---

**From:** Planning Central <Planning.Central@sportengland.org>  
**Sent:** 04 August 2017 12:09  
**To:** Neighbourhood Planning Team  
**Subject:** Shobdon Neighbourhood Plan

Thank you for consulting Sport England on the above neighbourhood plan.

Government planning policy, within the **National Planning Policy Framework (NPPF)**, identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.

It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 73 and 74. It is also important to be aware of Sport England's statutory consultee role in **protecting playing fields** and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Planning Policy Statement: 'A Sporting Future for the Playing Fields of England'.

<http://www.sportengland.org/playingfieldspolicy>

Sport England provides guidance on **developing planning policy** for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded.

<http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/>

Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 74 of the NPPF, this takes the form of **assessments of need and strategies for indoor and outdoor sports facilities**. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.

Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work.

<http://www.sportengland.org/planningtoolsandguidance>

If **new or improved sports facilities** are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes.

<http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/>

Any **new housing** developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for

social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.

In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how **any new development**, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.

Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.

NPPF Section 8: <https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities>

PPG Health and wellbeing section: <https://www.gov.uk/guidance/health-and-wellbeing>

Sport England's Active Design Guidance: <https://www.sportengland.org/activedesign>

*(Please note: this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.)*

If you need any further advice, please do not hesitate to contact Sport England using the contact details below.

Yours sincerely,

**Planning Admin Team**

T: 020 7273 1777

E: [Planning.central@sportengland.org](mailto:Planning.central@sportengland.org)



Sport Park, 3 Oakwood Drive, Loughborough, Leicester, LE11 3QF



## Latham, James

---

**From:** Wood, Tina  
**Sent:** 23 August 2017 10:40  
**To:** Neighbourhood Planning Team  
**Subject:** FW: Shobdon Regulation 16 neighbourhood development plan consultation

Point to note hat at section 5.9 I think there maybe a typing error. **Platy** should it read play?

Tina Wood  
Housing Development Officer

Strategic Housing | Adult and Wellbeing Directorate  
Herefordshire Council  
Plough Lane  
Hereford, HR4 0LE  
Tel: 01432 261975



---

**From:** Housing Development  
**Sent:** 31 July 2017 16:57  
**To:** Wood, Tina  
**Subject:** FW: Shobdon Regulation 16 neighbourhood development plan consultation

---

**From:** Neighbourhood Planning Team  
**Sent:** 28 July 2017 11:02  
**Subject:** Shobdon Regulation 16 neighbourhood development plan consultation

Dear Consultee,

Shobdon Parish Council have submitted their Regulation 16 Neighbourhood Development Plan (NDP) to Herefordshire Council for consultation.

The plan can be viewed at the following link: <https://myaccount.herefordshire.gov.uk/shobdon>

Once adopted, this NDP will become a Statutory Development Plan Document the same as the Core Strategy.

The consultation runs from 28 July 2017 to 15 September 2017.

If you wish to make any comments on this Plan, please do so by e-mailing: [neighbourhoodplanning@herefordshire.gov.uk](mailto:neighbourhoodplanning@herefordshire.gov.uk), or sending representations to the address below.