Much Marcle Neighbourhood Development Plan Consultation Statement

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1. Consultation Process

Introduction

- 1.1 This Consultation Statement has been prepared to fulfil the legal obligations of the Neighbourhood Planning Regulations 2012 in respect of the Much Marcle Neighbourhood Development Plan (MMNDP).
- 1.2 The legal basis of this Consultation Statement is provided by Section 15(2) of Part 5 of the Neighbourhood Planning Regulations 2012, which requires that a consultation statement should:
 - Contain details of the persons and bodies who were consulted about the proposed NDP;
 - Explain how they were consulted;
 - Summarise the main issues and concerns raised by the persons consulted; and
 - Describe how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan.
- 1.3 The Vision, Objectives and Policies contained in the MMNDP are the result of considerable interaction and consultation with the local community and businesses within the parish of Much Marcle. The preparation of the MMNDP has been overseen and coordinated by a Working Group, which was established by the Parish Council in September 2013. This work has engaged the local community, the Working Group and Parish Council over approximately 4.5 years, through questionnaire surveys, public open meetings and events. Views and interactions from this process led to the Vision and Objectives in Section 3 of the MMNDP, and subsequently helped to inform the basis for the Policies set out in Sections 4 to 10 and non-land use Policies included in Section 11.

Consultation aims

- 1.4 The aims of the MMNDP Consultation process were to:
 - 'Front-load' the consultation to understand the needs and wants of the local community;
 - Involve as many local people, businesses and groups within the community as possible;
 - Use a variety of approaches and techniques, venues, dates and times to ensure the widest possible engagement with the consultation process;
 - Convey the vision and objectives, and emerging policies of the MMNDP across to the local community and seek their input;
 - Develop the MMNDP in conjunction with the local community, taking time to gather a wide range of views and play back what we heard.

A high level summary of the consultation process, Working Group responses and subsequent actions is shown in the Consultation Statement Summary Table in the Appendix to this document, which should be read together with the Consultation Summary Report (May 2017) and a more detailed summary of the Regulation 14 consultation responses available for scrutiny on the Much Marcle Parish Council website www.muchmarcleparishcouncil.org.

Public meetings and consultation activities

- 1.5 Consultation was undertaken by the MMNDP Working Group, in association with Much Marcle Parish Council.
- 1.6 Public meetings and consultation activities took place at the following stages in the MMNDP process:
 - 'Start Up' Public Meeting (July 2013) Public open meeting at Much Marcle Memorial Hall;
 - Local Residents Questionnaire Survey (November 2014) Front-loaded consultation designed to scope initial issues;
 - Initial Progress and Process Update (March 2015) Two public open meetings at Much Marcle Memorial Hall;
 - Local Businesses Questionnaire Survey (March 2015) Targeted questionnaire to which 12 local businesses responded;
 - Redundant Buildings Survey (June 2015) Targeted survey of 19 redundant and disused buildings suitable for conversion was completed and their owners approached about their willingness to them bring forward for new housing during the Plan period;
 - Progress Update: Vision & Objectives Consultation (April 2016) Public open meeting and question and answer session at Much Marcle Memorial Hall;
 - Regulation 14 Consultation (December 2016) Public open meeting at Much Marcle Memorial Hall and written representation consultation;
 - Kynaston Landowners Questionnaire (December 2016) Targeted questionnaire survey, carried out by the local parish councillor, to which 3 local landowners responded with views about their willingness to release and bring forward land for new housing in Kynaston during the Plan period;
 - Rushall Residents Consultation (January 2017) Public open meeting at Rushall Club to discuss settlement boundary and other issues relating to Rushall and Kynaston;

- Old Pike (Much Marcle) local residents consultation (March 2017) Public open meeting at Much Marcle Memorial Hall called to invite local residents to discuss specific concerns about housing site allocations and affordable housing;
- Monks Meadow local residents consultation (September/October 2017) Targeted consultation with the owners of the 'garden plots' behind Monks Meadow to seek views about their willingness to release and bring forward their land for new housing during the Plan period;
- Parish magazine article an article summarizing the Regulation 15 submission, the Regulation 16 consultation process, and what happens next was submitted for publication in the January 2018 issue of The Mercury.



- 1.7 Groups that the Working Group has consulted include:
 - Much Marcle Primary School Governors Meeting (May 2014)
 - Parochial Church Council Meeting (July 2015)
- 1.8 There were no specific groups that were felt to be under-represented throughout the process. Attendance at the various public open meetings was from a wide cross-section of the community that broadly represented the demographic mix of Much Marcle.

Stakeholder consultations

1.9 Throughout the plan-making process the Working Group engaged closely with Herefordshire Council. Close contact was kept with the Neighbourhood Planning Team at Herefordshire Council throughout and meetings were also held with officers of the Strategic Planning and Development Management Teams at key stages in the process, in particular to address matters relating to the creation of settlement boundaries for Rushall and Kynaston and housing site allocations outside the settlement of Much Marcle.

- 1.10 The Working Group submitted a formal screening request regarding the need for a Strategic Environmental Assessment (SEA) of the draft MMNDP in 2014. Herefordshire Council provided its formal response later in 2014, stating that an SEA was required. A copy of the full Screening Report is included as part of the supporting evidence base.
- 1.11 Herefordshire Council prepared a SEA Scoping Report and the Working Group submitted comments in September 2014. The final SEA Scoping Report was submitted for formal consultation in October 2014 with the relevant statutory bodies. The 5-week consultation period ran from 3rd October 2014 to the 7th November 2014.
- 1.12 The consultation resulted in 2 responses. Both responses were collated and incorporated within the SEA document where relevant.

2. Key responses from consultation

- 2.1 The Local Residents' Questionnaire, distributed in November 2014 identified some of the key issues that the Working Group then sought to address. The questionnaire was distributed to more than 500 local residents over the age of 18 and 191 responses were received, equating to approximately a 39% response rate. Some of the main findings included:
 - Centre and edge of settlement locations were preferred areas for new homes.
 - Conversions of existing buildings and brownfield sites were by far the most popular, while 85% agreed with the principle of new homes being delivered from conversion redundant buildings.
 - Between 35% and 44% felt self-build, social and sheltered housing should be the priority.
 - Strong preference was given for traditional style buildings.
 - Agriculture, tourism, leisure, crafts, holiday accommodation and food & drink employment opportunities should be encouraged.
 - 40% favoured positive options to address climate change.
 - Faster broadband and better mobile phone reception desired.
- 2.2 The Analysis of Residents Questionnaire (January 2015) report, which includes a copy of the Questionnaire Survey, is available for scrutiny on the Much Marcle Parish Council website www.muchmarcleparishcouncil.org.
- 2.3 After a two initial progress and process update meetings in March 2015, the emerging Vision, Objectives and Policies were consulted on at an open public meeting in April 2016. They received strong support, although the number of consultation responses from local residents were received which stated reasons for objection to land identified for possible affordable housing at Old Pike.

2.4 The strong support for the emerging Vision, Objectives and Policies, as well as general support for the proposed housing site allocations enabled the Working Group to produce an initial draft Plan in the autumn of 2016.

3. Regulation 14 Pre-Submission Consultation

- 3.1 The Working Group finalised the draft MMNDP in October 2016. The Regulation 14 Pre-Submission Consultation on the draft Plan took place during an 8-week period between November 7th 2016 and January 3rd 2017.
- 3.2 A coordinated publicity campaign was undertaken which comprised:
 - Notice and link on the Much Marcle Parish Council website: <u>http://muchmarcleparishcouncil.org/much-marcle-parish-neighbourhood-plan/</u>
 - Notice and link on Herefordshire's website: https://myaccount.herefordshire.gov.uk/much-marcle
 - Parish magazine article an article summarizing the Regulation 14 consultation process and timeline was published in the December 2016 issue of The Mercury;
 - A leaflet 'flyer' with similar text to the Parish magazine article was distributed to as many households that could be reached via the local postman;
 - Digital copies of the consultation draft MMNDP were made available to view and/or download from the community websites: muchmarcleparishcouncil.org, and muchmarcle.net;
 - Physical hard copies of the consultation draft MMNDP were made available for consultation at Much Marcle Stores, Graham Baker Motors, the Memorial Hall and at the home addresses of all Much Marcle Parish Councillors;
 - Evidence Base Summary, Working Group Reports and all other documents concerning the consultation draft MMNDP were made available on the Parish Council website muchmarcleparishcouncil.org;
 - A public open meeting was held to discuss the consultation draft MMNDP at the Memorial Hall on Wednesday 7th December 2016.
- 3.3 The full list of statutory consultees that were written to is as follows:
 - Neighbouring Parishes (including those in Gloucestershire)
 - Herefordshire Council Ward Member (Barry Durkin)
 - Parliamentary constituency MP (Bill Wiggin)
 - Herefordshire Council Neighbourhood Planning Team
 - Wye Valley NHS Trust
 - Council for the Protection of Rural England
 - Herefordshire Wildlife Trust
 - RWE Npower Renewables
 - Amec Environment and Infrastructure UK Ltd
 - Dwr Cymru Welsh Water
 - Severn Trent Water
 - Western Power Distribution
 - Natural England

- Environment Agency
- English Heritage
- Historic England
- Highways England
- Homes & Communities Agency
- Hereford & Worcester Chamber of Commerce
- Ledbury & District Civic Trust
- Ross-on-Wye & District Civic Trust.
- 3.4 Acknowledgements of receipt of the Regulation 14 consultation and/or "no specific comments" were received from CPRE, Environment Agency, English Heritage, Highways Agency, Natural England and Severn Trent water. Welsh Water stated no objection and Historic England's responses stated support for the plan.
- 3.5 Herefordshire Council's Planning Policy and Development Management Teams both responded to the consultation stating that, since Kynaston is not identified as a settlement in Figures 4.14 and 4.15 of the Core Strategy, it should be treated as open countryside. This was therefore in conflict with the proposed aim of the MMNDP to assign settlement boundaries to both Rushall and Kynaston, and to allocate housing sites to both villages.
- 3.6 As a result of these consultation responses discussions were held between the MMNDP Working Group, and officers of the Neighbourhood Planning, Strategic Planning and Development Management Teams at Herefordshire Council in January and September 2017.
- 3.7 It was eventually agreed that Herefordshire Council would support the principle of the allocation of settlement boundaries to Rushall and Kynaston on the basis that the NPPF requires that "planning authorities should be responsive to local circumstances and plan housing development to reflect local needs" and that "to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities".
- 3.8 It was agreed that two of the proposed housing allocation sites at Kynaston would be removed from the emerging plan due to the impact upon the setting of listed buildings or their wholly unsustainable and isolated location.
- 3.9 In total 12 responses were received from local residents, which pertained mainly to 5 topic areas:
 - Settlement boundaries some concern was expressed that Rushall should not have a settlement boundary;
 - Housing site allocations in Rushall and Kynaston the housing allocations in Rushall received some opposition;
 - Housing site allocations in Much Marcle a small number of representations were received which objected to one of the housing allocations;
 - Rural exception sites some respondents cited the recent refusal of planning permission at Dobbins Pitch as a reason for objecting to other 'open countryside' housing site allocations.

- Proportionate Housing Growth 2011-31 responses from 8 local residents suggested that the allocation of almost 50% of new dwellings to Rushall and Kynaston seems disproportionate, compared with Much Marcle.
- 3.10 A detailed summary of the Regulation 14 consultation responses available for scrutiny on the Much Marcle Parish Council website www.muchmarcleparishcouncil.org.

MMNDP Working Group

December 2017

Consultee	Comments	MMNDP Response	Action Required
Informal Pre-Regula	tion 16 Consultation		
Herefordshire Council Neighbourhood Planning, Strategic Policy & Development Management	Meeting between planning officers, Working Group Chair and Foxley-Tagg Planning to discuss variance of views about policy treatment of Rushall and Kynaston, settlement boundaries and housing site allocations.	Continue to treat Rushall & Kynaston as a single settlement within the meaning of CS Policy RA2.	Meeting held 26/9/17 – report on www.muchmarcleparishcouncil.org
26/9/17	In discussion we agreed to: Continue to treat Rushall & Kynaston as a single settlement within the meaning of CS Policy; Delete Land by The Steppes, and Land behind Bridge Cottage from the proposed 'Allocated sites' at Kynaston; Retain the Old Chapel site as a proposed 'Allocated site' for up to 5 new dwellings. The Constraints Map was deemed helpful in illustrating the difficulty of identifying sites for development in and around Much Marcle village centre.	Delete infill sites (Land by The Steppes, and Land behind Bridge Cottage) from housing site allocations at Kynaston. Retain the Old Chapel site as a housing site allocation for up to 5 new dwellings at Kynaston.	Infill sites (Land by The Steppes and land behind Bridge Cottage) withdrawn from housing site allocations.
Herefordshire Council Neighbourhood Planning, Strategic Policy & Development Management 12-15/9/17	Strategic Policy and Neighbourhood Planning have no objection in principle to considering Rushall and Kynaston as a single settlement based upon clear evidence. Development Management (14/9/17) do not consider this approach un-implementable and state "a small number of dwellings here would be preferable to pressure in other less sustainable and potentially	Agreed with regard to treatment of Rushall and Kynaston as a single settlement, and accept concerns about potential impacts of infill sites on settings of listed buildings.	Infill sites (Land by The Steppes and land behind Bridge Cottage) withdrawn from housing site allocations.

	 more impactful locations", but express concerns about two infill sites within curtilages of listed buildings. Expect to see housing supply divided into categories of allocated, windfall and exception sites (based on sound evidence). "There were 33 houses completed in 1996 – 2011, [and] all of these were 'windfall' development" (Strategic Planning 12/9/17). 	Agreed.	Table added to Plan, which shows proposed housing supply figures in each category.
	Development Management (15/9/17) subsequently state " <i>Kynaston is an unsustainable location</i> " when assessed against NPPF.	Further meeting requested with Council planning officers to discuss variance in their responses.	Meeting held 26/9/17 – report on www.muchmarcleparishcouncil.org
Herefordshire Council Neighbourhood Planning & Strategic Policy 24/1/17	Meeting between planning officers, Ward Councillor Barry Durkin (Old Gore), Working Group Chair and Foxley-Tagg Planning to discuss Regulation 14 consultation responses.		Meeting held 24/1/17 – report on www.muchmarcleparishcouncil.org
	Neighbourhood Planning confirmed that the MMNDP must pass all four tests of conformity with planning policy.	Agreed	
	Strategic Planning stated that if a detailed and well- evidenced written case is made to treat Kynaston and Rushall as a joint settlement within the meaning of Policy RA2, Herefordshire Council would consider it. This case should be published as a supporting document on the MMPC website.	Agreed.	Working Group produced an Exception Case for Kynaston and published it on www.muchmarcleparishcouncil.org
	Strategic Planning advised that supporting text on settlement boundaries should 'anchor' the approach taken within the MMNDP to criteria in Herefordshire	Agreed.	Additional text added, settlement boundaries assessed against Guidance Note 20 criteria with minor

	 Council Guidance Note 20 – guide to settlement boundaries. Planning officers advised that MMNDP Working Party should produce a composite constraints map of Much Marcle to illustrate the shortage of land suitable for development within the Plan Period. Overall approach to housing site allocation within the Regulation 14 consultation draft Plan and priority given to affordable housing were discussed. 	Agreed.	revisions to boundaries made subsequently. Composite constraints map for Much Marcle produced and included in revised draft Plan.
Regulation 14 Consu			
Neighbourhood Planning 12/12/16	Detailed comments have been already made prior to regulation 14 Much Marcle draft NDP in September 2016. In response to the comments made, the NDP group have accepted the majority of the comments and have amended their plan.	Comments about specific housing site allocations considered and majority have been accepted.	Housing site allocations amended.
	Policy MM12- Could include how your Local green spaces comply with paragraph 77 of the NPPF. This will help strengthen your justification.	Agreed.	Text amended and text box added to show how green spaces comply with para 77 of NPPF.
	Please add the PSMA licence to all of the maps you intend to use in your consultations and publications.	Agreed.	PSMA licence number added to maps.
Development Management 16/11/16	With regards Much Marcle, the [settlement] boundary seems sensible, but some of the allocations (next to single dwellings, or very modest groups) appear not to be so with regards connectivity etc. In particular the sites to the west of the A449 seemed to be at odds with all that the NPPF and CS promote.	Comments about specific housing site allocations considered and majority have been accepted.	Housing site allocations amended.

	The site to the east of Glebe Orchard is considered to have potential. Dobbins Pitch is an unsustainable location, in regards to highways and ecology.	Agreed Agreed	Site allocated for housing, subject to habitat compensation for loss of Priority BAP Habitat. Site withdrawn from housing site allocations.
	Rushall is a figure 4:15 settlement, but Kynaston is not. To allocate this number of allocated sites in such unsustainable locations would conflict with the NPPF and CS.	Partially agreed – see Exception Case for Kynaston published on www.muchmarcleparishcouncil.org	Following discussions about the Exception Case for Kynaston with Strategic Planning & Development Management on 26/9/17, in principle agreement was reached to treat Rushall & Kynaston as a single settlement within scope of CS Policy RA2, and housing site allocations were amended accordingly.
Planning Policy 11/11/16	Are there any assurances that the identified sites to be used for housing are deliverable? Are they going to be available to come forward for development in the plan period?	Yes. Yes.	Owners of all the housing site allocations (including redundant buildings for conversion) have been approached and replied affirming their willingness to bring sites forward in the plan period.
	Are there any facilities that there is an identified need or desire for in the Parish that are not currently provided, but could be sought with new development?	Yes – see Consultation Summary Report published on www.muchmarcleparishcouncil.org	
	Settlements that are not identified in Figures 4.14 and 4.15 of the Core Strategy, which applies to Kynaston, should be treated in policy terms as countryside. Any new housing development here would therefore need to accord with the criteria of Policy RA3. This limits the scope for the delivery of any significant housing development in this location.	Partially agreed – see Exception Case for Kynaston published on www.muchmarcleparishcouncil.org	Following discussions about the Exception Case for Kynaston with Strategic Planning & Development Management on 26/9/17, in principle agreement was reached to treat Rushall & Kynaston as a single settlement within scope of CS Policy

			RA2, and housing site allocations were amended accordingly.
Environmental Health 10/11/16	We recommend additional criterion to Policy MM3 on Housing Sitescomplement adjacent properties, would not result in loss of amenity for existing residents and where the amenity of future residential occupants is not impacted by existing development. This is to ensure that future residential occupants are not nuisanced as a result of existing business activity. (agricultural/industrial/commercial).	Not agreed.	The intended outcome of this additional criterion will be achieved by the choice of housing site allocations.
Environmental Health – Air Water Waste 29/11/16	Refer to historical use as orchards of various housing land allocations and possible legacy of contamination form spraying practices; and to the Hazerdine site as a former sand and clay quarry.	Nil	None
Natural England 01/12/16	No specific comments.		
Historic England 28/11/16	Supportive of both the content of the document and the vision and objectives set out in it. "The emphasis on the conservation of local distinctiveness and the protection of rural landscape character including important views is commendable. We consider the Plan takes a suitably proportionate approach to the historic environment of the area. Beyond that observation we have no substantive comments to make on what Historic England considers is a good example of community led planning."		
Environment Agency 01/12/16	"Whilst we welcome reference to flood risk within the Draft Plan we would not, in the absence of any specific sites allocated within areas of fluvial flooding, offer a bespoke comment at this time."		

Severn Trent Water 23/11/16	Generic response – no specific comments.		
Dwr Cymru Welsh Water (undated)	Generic response stated "There are no issues with supplying any of the proposed allocations with a supply of potable water, though in some instances the provision of off-site water mains may be required in order to connect to the existing network."		
CPRE Herefordshire Branch 08/11/16	No specific comments.		
Anthony & Virginia Carlton Hill View Much Marcle HR8 2NX 21/11/16	Practical difficulties with affordable housing provision at Old Pike and excessive traffic movements.	Issues raised are similar to those in previous email correspondence to which the Working Group responded by letter dated 15/7/16. Mr & Mrs M & WP Miller of Dingle Cottage HR8 2NU raised similar issues in a letter dated 23/4/16.	Working Group Chair responded by further letter dated 26/2/17 to invite Mr & Mrs Carlton to attend a meeting on 6/3/17, which they declined (non-attendance).
Judy Brierley The Row Much Marcle HR8 2NU 30/11/16	Additional social housing at Old Pike does not comply with the MMNP's own guidelines for the following reasons: traffic hazards, distance from and accessibility to community facilities, loss of informal play area, impact on personal business.	Issues raised are similar to those in previous letter dated 24/4/16 to which the Working Group responded by letter dated 20/5/16.	Working Group Chair responded by further letter dated 26/2/17 to invite Mrs Brierley to attend a meeting on 6/3/17, which she declined. Mrs Brierley subsequently met the Chair on 9/3/17 to discuss her concerns.
Peter & Alice Montague-Fuller Gatchapin Farm Rushall	Allocation of 50% housing growth to Rushall and Kynaston seems disproportionate.	Incorrect analysis of proposed housing site allocations and new housing built/committed since 2011.	Public meeting held at Rushall Club on 23/1/17 and residents invited to join Working Group – see report on www.muchmarcleparishcouncil.org
HR8 2PE	Allocation of housing land opposite Rushall Club is flawed – not brownfield and would lose car park area.	Agreed.	Housing land allocation opposite Rushall Club withdrawn.
23/12/16	Allocation of housing land at rear of Council Houses	Agreed.	Housing land allocation at rear of

	(Orchard View) impacts agricultural land with drainage/flood risk issues and existing residents' views.		Orchard View withdrawn. Rushall Settlement Boundary amended by local residents and
	Rushall Settlement Boundary does not follow any physical feature.	Agreed.	endorsed by Working Group.
Julian & Alison Baldwin The Walkers Rushall HR8 2PE 29/12/16	Similar comments to Montague-Fullers with addition: Housing allocations and settlement policies are flawed. Much Marcle Conservation Area used as excuse for imposing growth on outlying hamlets.	See above.	See above.
Robert & Mary Jolly Jubilate Rushall HR8 2PE 30/12/16	Similar comments to Montague-Fullers and Baldwins with addition: Lack of definition of what is a "developed frontage" would make policy difficult to apply.	See above. Agreed.	See above. Policy and justification wording amended.
Doreen Pockwell Clems Cottage Rushall 3/1/17	Allocation of housing land opposite Rushall Club is flawed – not brownfield and would lose car park area.	Agreed.	Housing land allocation opposite Rushall Club withdrawn.
Sian Nunn 2 Orchard View Rushall 3/1/17	Similar comments to Montague-Fullers, Baldwins and Jollys.	See above.	See above.
Stuart McCarthy Orchard View Rushall 3/1/17	Similar comments to Montague-Fullers, Baldwins and Jollys.	See above.	See above.

Informal Pre-Regulation	on 14 Consultation		
Herefordshire Council Neighbourhood Planning 23/9/16	"I think the best way forward to be able for you to allocate housing sites in Kynaston, is to include this as part of the Rushall settlement; as stated in your plan. I have spoken with [Strategic Planning] on this matter and think this is possibly the best solution, if you want to have housing sites within Kynaston. Acceptability of including Kynaston as part of Rushall can be further determined at Regulation 14 consultation, Regulation 16 consultation and at Examination" (email response from Neighbourhood Planning).	Agreed.	Confirmed approach to treat Rushall & Kynaston as a single settlement within scope of CS Policy RA2.