

Shobdon

Neighbourhood Development Plan 2016 – 2031

Consultation Statement



August 2018

Produced by Shobdon NDP Steering Group in association with Data Orchard CIC
Version 2. 1st August 2018

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1. [Introduction & Background](#)

1.1 This Consultation Statement has been prepared in accordance with The Neighbourhood Planning (General) Regulations 2012 (SI No.637) Part 5 Paragraph 15 (2) which defines a consultation statement as a document which:

- (a) contains details of the persons and bodies who were consulted about the proposed neighbourhood development plan;*
- (b) explains how they were consulted;*
- (c) summarises the main issues and concerns raised by the persons consulted; and*
- (d) describes how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan.*

1.2 The Neighbourhood Development Plan was created in response to the *Localism Act 2011* that reformed the planning system, devolving power away from Whitehall and offered communities an opportunity to take a leading role in how their local environment would develop in the future.

1.3 Shobdon Parish Council asked Herefordshire Council to designate the parish as a Neighbourhood Plan Area under the Localism Act and, following a period during which the community were consulted upon whether this should proceed, it was approved on 16th July 2012.

1.4 In September 2012 a Parish Plan Steering Group was formed with the intention of addressing the wider needs and aspirations of the community, but with a clear brief from the Parish Council to gather evidence for both the Parish Plan and the upcoming Neighbourhood Plan. As a result the Parish Plan project had a head-start on the Neighbourhood Plan, with the intention of taking an early lead on public consultations.

1.5 The first meeting of the Neighbourhood Plan Steering Group took place in July 9th 2013, but its work really started in September 2013, following the publication of the Parish Plan Survey results. Although the Parish Plan and Neighbourhood Plan projects ran separately, there was clear liaison between the two, especially with regard to evidence gathering and public consultations. To facilitate this coordinated approach, several individuals sat on both steering groups and both produced a report/update at every Parish Council meeting.

1.6 The Neighbourhood Plan Steering Group produced a project plan to ensure that the communities and other stakeholders were consulted and engaged at every stage of the process. As a result the level of public participation was very high and this will be described in section 2 below.

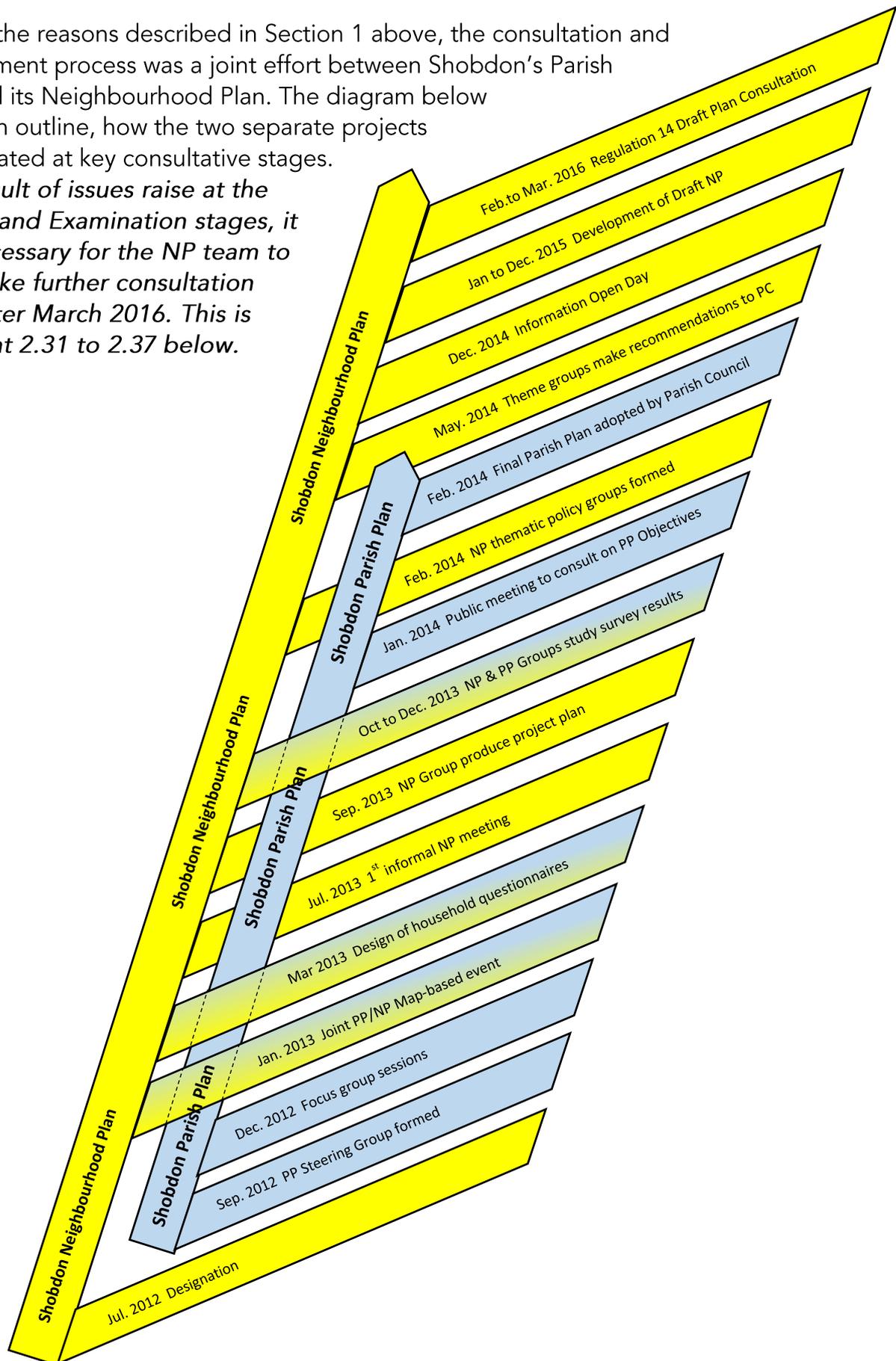
1.7 Access to information and events was maintained throughout via regular:

- notices and posters on parish notice boards
- articles in the Shobdon newsletter (paper and on-line)
- updates on the Parish Council website (minutes, events, documents)
- social media
- publicity banners

2. The Consultation & Engagement Journey

2.1 For the reasons described in Section 1 above, the consultation and engagement process was a joint effort between Shobdon's Parish Plan and its Neighbourhood Plan. The diagram below shows, in outline, how the two separate projects collaborated at key consultative stages.

As a result of issues raised at the Reg.16 and Examination stages, it was necessary for the NP team to undertake further consultation work after March 2016. This is shown at 2.31 to 2.37 below.



2.2 As a results the sequence of events below tracks relevant activity for both projects. The timeline indicated below shows whether the activity was undertaken by the PP Steering Group or the NP Steering Group, or whether it was a joint enterprise. PP activity is highlighted in blue, NP activity in yellow and joint activity in green

2.3	NP	28 th May 2012	Shobdon Parish Council formally applied to Herefordshire Council to designate their joint parishes as a Neighbourhood Area. The consultation period ran from 29 th May 2012 – 10 th July 2012. No representations were received during the consultation period and Herefordshire Council confirmed designation on 16 th July 2012.
2.4	PP	Sep. 2012	Parish Plan Steering Group (PPSG) formed. The purpose of the steering group was to work in partnership with the Parish Council to complete a Parish Plan. The Steering Group’s role was to ensure, as far as is possible, that the plan represented the wishes and views of people who lived and worked in the parish of Shobdon.
2.5	PP	Oct to Dec 2012	Focus Group Consultations by the PPSG The intention at this early stage was to ensure that people from different groups were heard as part of obtaining the first view of the important parish issues. Good input was achieved by consulting 8 focus groups; Local Farmers, Older Residents, Parents of School children, Young Children (5-11), School Students (11-15), Airfield Users, Home workers, and Young Adults. In total approximately 60 people were consulted. Some specific individuals were also consulted along with representatives of several important businesses and the local Police.
2.6	PP/ NP	18 th Jan to 1 st Feb 2013	Wider public consultation led by PPSG The Focus group views outlined above were used to inform a public consultation process. At organised ‘Have your Say’ sessions at the village hall on 18 th and 19 th January plus a repeat session on 1 st February, parishioners comments and discussion with the team created a strong view of what was considered important. The events were structured using the ‘Planning for Real’ map-based process to capture ideas and comments. These public meetings were also used to publicise the intention to develop a Neighbourhood Plan and that the information collected from these events would also inform the NP. 132 people attended over three days. 268 different comments were made and over 1500 endorsements or disagreements were added to these comments.
2.7	PP	Feb/Mar 2013	Collation and summarising of feedback from the public comments was undertaken by the PPSG. This was done by analysing and then grouping the comments from the ‘Have your Say’ events, enabling the key issues to be identified and to discover what aspects were of interest / concern to parishioners.
2.8	PP/ NP	Mar to Apr 2013	Design of a survey for all parishioners March to April 2013 The PPSG used the topics identified from the above groupings to determine the questions in the survey, in order to test that the views expressed at the ‘Have your Say’ events were representative of the views of the wider community.

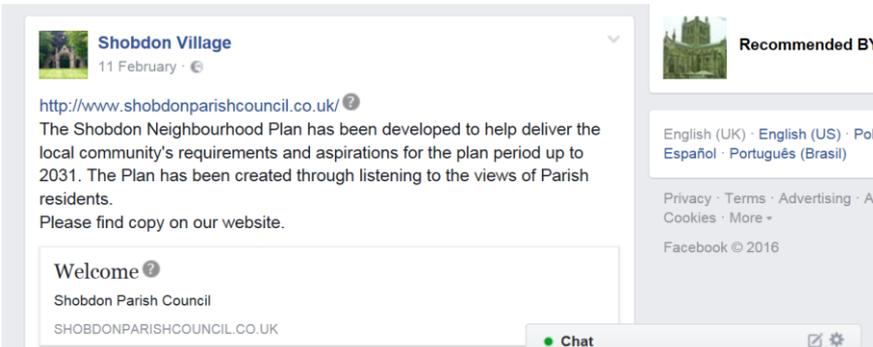
			<p>Parishioners expressed considerable interest in housing issues which reinforced and justified the Parish Council's commitment to developing a Neighbourhood Plan (NP). As a result the questions were expanded to cover all aspects essential to the NP.</p> <p>A Young People's survey (11-17 year olds) was also developed. This survey was kept simple and short. It was considered that younger children under the age of 11 had been sufficiently consulted via the active support of the Primary School and at the 'Have your Say' events.</p>
2.9	NP	27 th Apr 2013	<p>Parish Council held an exploratory meeting to discuss the requirements for producing a Neighbourhood Plan on 27th April 2013. Guidance was provided by an officer from Herefordshire Council's Neighbourhood Planning team. The meeting was reminded that the earlier 'Have your Say' events had publicised the intention to proceed with a Neighbourhood Plan and that the issues raised would be used as a starting point for the NP project.</p>
2.10	NP	9 th July 2013	<p>Informal first NP meeting held, with several parishioners expressing an interest in being involved.</p>
2.11	PP	July 2013	<p>Survey logistics and return rates.</p> <p>The PPSG used the postcodes of the Parish to divide the distribution runs into 19 sets of about 20 homes.</p> <p>These sets were shared between 18 volunteers who called on each address with the intention, wherever possible, to speak to residents face to face so that the purpose of the survey could be explained and to encourage completion. A time was agreed when the completed forms would be collected or alternative arrangements for return were offered.</p> <p>380 properties were visited, certainly very close to 100% of occupied properties in the parish. Based on the 2011 census, the expectation was to cover about 660 adults and 72 young people. The response rate was very good, with 75% of properties returning at least some questionnaires; based on these census numbers, 66% (435) of adults and 65% (47) of young people completed questionnaires.</p>

2.12	PP/ NP	Summer 2013	<p>Major article in Shobdon Newsletter on the Neighbourhood Plan and on the Parish Plan questionnaire results, and how the 2 activities were related.</p>  <p>Welcome to the Summer 2013 edition of Shobdon News Summer 2013 No 111</p> <h3>Neighbourhood Plan</h3> <p>The Localism Act introduced by national government 2 years ago has reformed the planning system to give local people new rights to shape the development of the communities in which they live. These new rights will come in the form of a Neighbourhood Development Plan for the Parish of Shobdon which will set out the vision for our Parish, and the planning policies for the use and development of land within it for the next 20 years. These policies will be local issues to support the strategic policies within the Herefordshire Council Local Plan. In essence the Plan should focus on guiding development rather than stopping it, whilst giving the Parish an increased ability to influence planning within your area.</p> <p>The Neighbourhood Plan will be able to contain a variety of issues and policies which are most relevant to the parish. More importantly our plan should be responsive to the needs and aspirations of the whole community including:</p> <ul style="list-style-type: none"> Identify sites for housing, including affordable housing Provision for business to set up or expand in the parish Provision of cycle ways and footpaths Identify sites for community use such as schools, village halls, health centres, and leisure facilities. Design guidelines for your parish Protection and creation of open spaces, green amenity areas, nature reserves, allotments, play areas Protection of important local buildings and other historical assets Promoting of renewable energy schemes and projects. <p>However, our Plan will need to be in accordance with the planning policies and guidance at a local, national and European level and meet the Neighbourhood Planning regulations. This will be tested in an independent examination, and will need to show it is the will of the people of the parish by being subject to a community referendum.</p> <p>Once the plan is made or adopted, it will become a statutory plan carrying equal weight to the Herefordshire Council Plan and be part of the Local Development Framework. This will mean that it will be used in making decisions on planning applications by Herefordshire Council in your area.</p> <p>So – where have we got to...?</p> <p>In order to try and have a good spread of people from all parts of the parish, the Parish Council put together a list of possible residents who are either residents, business owners, land owners, employed or retired within the parish. They have met once in order to discuss the principles of the plan, and are next hoping to have a meeting in September with another local parish who are further along with their plan to understand what it involves.</p> <p>As a team the most current information to be used to show what the parish would like will be the results of the Parish Plan Questionnaire. From this, there will then be further consultation with the parish to understand exactly what is wanted. However, at any time if you want to have any input then what might be covered in the Neighbourhood Plan, then please make contact with a member of the Parish Council.</p> <p>Finally – we are still looking to expand the team working on the neighbourhood plan. Therefore if you have the time and motivation to be involved and particular if you either have a background in issues relating to development planning, or local business, we would love to have you on board. Please contact either Ann Kern Phillips (annkernphillips@yahoo.com) or Bill Strick (bill@shobdon.co.uk).</p> <h3>Parish Plan Survey of Parishioners</h3> <p>As you read this, the completed survey questionnaires are with Hereford Council Research group for analysis, initial analysis is done.</p> <p>The survey has been the focus of our parish plan efforts since the last edition of Shobdon News. We did not quite keep to our intended timetable but the questionnaires were distributed in early July and collected again soon after. The parishes of the Parish were divided into 19 areas of about 20 homes. These areas were shared between 18 volunteers. Each then called on each address. We sought to speak to residents at each face to face so that we could explain the survey and encourage completion. We also agreed when we would collect the completed forms or how they could be returned.</p> <p>There were two questionnaires, one for people 18 years and over and one for young people 11-17 years old. We visited around 380 properties, certainly very close to 100% of occupied properties in our parish. Based on the 2011 census, we expected to cover about 660 adults and 72 young people. Your response rate was good! About 75% of properties returned at least some questionnaires, based on these census numbers, about 66% (455) of adults and 65% (47) of young people completed questionnaires – thank you! We are pleased you thought it worthwhile and we will work hard to achieve useful outcomes. We also had 47 people offer to help in some way in parish events or activities – we will contact you as it is appropriate as the Parish Plan develops.</p> <p>The survey covered all the issues that were given significance in our discussions with focus groups and at our public consultation in January. In addition, you will have seen elsewhere in this edition of Shobdon News, that our Parish Council has now embarked on a Neighbourhood Plan. This other plan is also explained there. We therefore struggle to include appropriate questions for the Neighbourhood Plan in our survey, questions about housing and business development.</p> <p>Once the initial analysis is completed, the meeting group will discuss the results and decide whether further more detailed analysis is needed. The aim is to understand your views in terms of wishes and priorities but also where there may be a range of views. This will then direct our efforts in terms of actions and next steps to explore and detail. We hope by December edition of Shobdon News to have issued our report.</p> <div style="border: 1px solid black; padding: 5px; width: fit-content;"> <p>Survey Prize Draw Winners Adult winner of £40 – Jackie Francis Young winner of £10 – Emily Green Congratulations!</p> </div> <p>2 Shobdon News, Summer 2013</p>
2.13	PP	Aug/Sep 2013	<p>Statistical analysis of PP survey This was completed by the Research Group of Herefordshire Council.</p>
2.14	NP	26 th Sep 2013	<p>NP Steering Group produce Project Plan, including links to PP.</p>
2.15	PP	Sep/Oct 2013	<p>Understand and summarise the survey results. The PPSG created four sub-groups to consider key themes from the survey results. Each produced a summary of the results that could be shared for further work. An overall survey summary was then created and this was used to create objectives. The summary was issued as a supplement to the Christmas Shobdon News which is delivered to all houses in the parish. It also included a public invitation to a Parish Plan event on January 18th 2014. The Christmas supplement can be viewed on-line at :-</p>

<https://static1.squarespace.com/static/5093807ce4b08a6452e9be68/t/52acbc3ee4b0f29916f6d5b1/1387052094982/pp-survey-summary-insert.pdf>

2.16	NP	17 th Oct 2013	NP Steering Group consider results of Parish plan questionnaire. Two working sub-groups formed on 'Housing' and 'Business/Roads' to consider PP survey results and options.
2.17	NP	17 th Nov 2013	Housing and Business/Roads sub-groups fed back the issues raised in the questionnaire to the NPSG; e.g. no more large developments, 1 or 2 dwellings per year of 2/3 bedrooms, prioritising affordable homes and senior citizen bungalows, and the preferred sites. Business/Roads group said survey results support additional small workshops on existing commercial sites, live/work units but not in the middle of housing development, better broadband and no additional retail in village centre.
2.18	PP	Dec 2013	Parish Plan Survey results published in Shobdon Newsletter
2.19	PP/ NP	Nov/Dec 2013	<p>Create and justify objectives for the plan based on the survey results</p> <p>The work of the PP thematic sub groups was pooled and a set of draft objectives were created by the steering group. The format was objectives, plus justification (survey and focus group data), and proposed actions. This document was shared with the full parish council to ensure its support. Agreement was also sought to go ahead with further public consultation based on these objectives. It was also made clear that topics related directly to Housing would be tackled separately as part of the Shobdon Neighbourhood Plan, and that all relevant information collected as part of the Parish Plan was being shared with the NP work group.</p>
2.20	PP/ NP	14 th Dec 2013	<p>Major article in Shobdon Newsletter regarding how the Parish Plan Survey results would inform the Neighbourhood Plan.</p> <p style="text-align: right;">Winter 2013 No 112</p> <h1 style="text-align: center;"><i>Shobdon</i> News</h1> <hr style="width: 50%; margin: auto;"/> <h2 style="text-align: center;">Neighbourhood Plan</h2> <p>In our September meeting, Peter Broadbent from Lyonshall Neighbourhood Plan team came and explained how they had been progressing. Because Lyonshall has no Parish Plan, a large part of their exercise has been to undertake a survey of parishioners to understand the key topics affecting their parish. It is no co-incidence that some of the questions in the Shobdon Parish Plan survey were chosen so the results would be of direct assistance to the Neighbourhood Plan team. Since the last update in the August newsletter, the Neighbourhood Plan team have been able to examine the results of the Parish Plan Survey. The wishes of the parish will play a central role in evidence used to form the Neighbourhood Plan, as the final stage is acceptance via referendum of the Neighbourhood Plan document. As identified in the survey document which is available on the parish website, the parish gave a clear voice regarding future development of housing and businesses in the parish.</p> <p>The housing results showed that the parish has no desire for future large housing developments, but would rather more small scale bespoke housing projects. With regard to business development, the preference was for further business development to be collocated with existing businesses on the airfield. The Neighbourhood Plan team continue to meet on a monthly basis and have discussed the above and how these wishes might be turned into a legal document which can be used to steer future development in the parish for the next 20 years. Whilst a number of the team are also members of the Parish Council, we also have a number of</p>

			<p>other members of the community involved. We are also being assisted by a Ted Bannister of Herefordshire Council planning services to ensure we stay on the right track. So where do we go next? Using the opinions from the Parish Plan Survey, we are now planning to start putting together a vision for where we would all like the parish to be in 15-20 years time. This might include what the area will look like, what facilities will be provided and what it will be like to live and work in. This vision will then have to be tested to see if the area we already live in can cope with that vision (utilities, environment, roads & public opinion). From this we can then develop some objectives which will set out what you want to achieve in order to help make the 'vision' a reality. Detailed policies and actions can then follow from these objectives. Finally – we are still looking to expand the team working on the neighbourhood plan. Therefore if you have the time and motivation to be involved and want to help develop the vision for the parish then we would love to have you on board. We would also welcome anyone who can bring a background in issues relating to development planning, or local business. Please contact either Ann Kent Phillips (annkentphillips@yahoo.com) or Bill Stokes (bill@billstokes.co.uk). <i>§ Bill Stokes, Neighbourhood Planning Chairman.</i></p>
2.21	PP	18th Jan 2014.	<p>Seek wide public views on the proposed objectives. Seek also service providers' views.</p> <p>A public meeting was held on 18th January 2014. This was publicised in the Christmas Shobdon News and through posters and banners. The objectives were available to view. Attendees were invited to comment on and offer their support for the draft objectives. Around 40 people attended and 21 stayed for the formal discussion. Comments reinforced objectives in the plan and additional offers of help were made. This was advertised via the Shobdon News.</p> <div data-bbox="877 694 1404 1456" style="border: 1px solid black; padding: 10px;"> <p style="text-align: center;">SHOBDON PARISH PLAN</p> <h1 style="text-align: center;">TIME TO SHARE.</h1> <p style="text-align: center;">Please join us in the Village Hall to discover more about the results of the Parish Survey and the recommendations for the future.</p> <p style="text-align: center;">SATURDAY JAN 18TH » 2PM - 4PM AT THE VILLAGE HALL QUESTIONS & ANSWERS FROM 4PM ONWARDS</p> <p style="text-align: right; background-color: #e91e63; color: white; padding: 5px;">FREE REFRESHMENTS AT THE EVENT.</p> <p style="text-align: center; font-size: small;">For more info visit www.shobdonparishcouncil.co.uk</p> </div>
2.22	NP	5 th Feb 2014	<p>NPSG created new Subgroups to consider Rural housing policy (affordable and general), Business and Employment, Social and Community facilities, (Church/school/pub/hall), Open Spaces, Sustainable Design & Energy Efficiency. Each group was asked to formulate their aims for later consultation with the public. To avoid confusion, it was agreed that a break was needed between the completion of the Parish Plan and the main public interaction with the Neighbourhood Plan.</p>
2.23	PP	24 th Feb 2014	<p>Finalise and issue PP proposals and report.</p> <p>The final Parish Plan Report went through several drafts and editing before agreement was sought at the Parish council meeting in February. At this meeting, the plan was formally adopted by the PC. Copies were provided to all key stakeholders, an electronic version was posted on the parish council website, and a summary was provided in the Easter version of Shobdon News. Paper copies were</p>

			also made available on request. In addition, the full survey analysis report, the draft objectives and the full final Parish Plan report were published on the Parish council website.
2.24	NP	12 th May 2014	<p>Update to PC on Neighbourhood Plan.</p> <p>A more detailed update was given to the Parish Council, covering the deliberations of the sub-groups and their key findings and recommendations. This update was also published in the Shobdon News and can be viewed at:-</p> <p>https://static1.squarespace.com/static/5093807ce4b08a6452e9be68/t/5504b6dee4b04b996327d09b/1426372318050/spring+2014+ver+3.1.pdf</p>
2.25	NP	Aug 2014	Further item in Shobdon newsletter updating public on progress with the NP, and that the sub-groups had made progress with their subjects and the next step was to hold a public event to discuss the vision and objectives.
2.26	NP	22 nd Sep 2014	PC given update and copy of completed Vision/objectives draft document. It was agreed to post this on the Parish Council website for public comment.
2.27	NP	25 th Nov 2014	<p>This was a PC meeting devoted entirely to the NP, including a presentation from the NP consultant.</p> <p>A proposal to inform the public of progress and "seek" their ideas and permission to carry on was agreed for later in December. PC members were asked to attend to explain the Plan to the public. It was also agreed to organise banners and notices to advertise the event.</p>
2.28	NP	13 th Dec 2014	Information open day. 46 parishioners attended this event and gave constructive comments on the work already completed. The main issue was again traffic, the volume and speeding. Visitors agreed with the new settlement boundary and again reiterated small not large developments.
2.29	NP	Jan to Dec 2015	Following the public information day, the NPSG embarked upon the detailed work associated with developing the draft plan. Updates were given at each PC meeting
2.30	NP	8 th Feb 2016 to 21 st Mar 2016	<p>Draft Plan published and Reg.14 six-week formal consultation period commenced.</p> <p>The draft plan and response sheet was delivered to every premise in the parish at Regulation 14 stage. The Draft Plan was available for viewing on the home page of the parish council's website and would be emailed to residents on request. Paper copies of the Plan were available for viewing at the Village Hall during its opening times and could be borrowed from the Parish Clerk. Its publication was also heralded on the Shobdon Village Facebook page.</p>  <p>Instructions were given on how to make comments in writing and a comments sheet was offered if respondents wished to use it. Comments could be posted, emailed or deposited via the collection</p>

		box made available at the village shop, the Bateman Arms and the foyer of the Village Hall.
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2.31	NP	14 th Dec. 2016	Regulation 16 plan submitted. The associated Schedule of Representations can be seen at Section 3 below, including:- Section 3.1 : Community Representations and Responses Section 3.2 : Stakeholder Representations and Responses Section 3.3 : The List of Alterations
2.32	NP	19 th July 2017	As a result of issues raised by the Local Authority it was agreed that two further development sites would be added to the Plan for it to proceed to re-submission of Regulation 16.
2.33	NP	21 st Sep. 2017	Plan sent to Independent Examiner
2.34	NP	14 th Dec. 2017	Independent Examiner challenged the evidence supporting the two additional development sites and, as a result, Regulation 16 was withdrawn.
2.35	NP	23 rd May 2018	Re-submission of Regulation 14 undertaken, including a report on the assessment of housing sites, which can be viewed here .
2.36	NP	21 Sep. 2017	The Schedule of Representations received in response to the Regulation 14 re-submission stage can be seen at Section 4 below, including Section 4.1 : Community/Developer Representations and Response Section 4.2 : The List of Alterations
2.37	NP	2 nd May 2018	The plan was redrafted and agreed at an extraordinary meeting of the Parish Council for the second re-submission Regulation 16 plan to Herefordshire Council.

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Section 3

Regulation 14 – (First Iterations)

Shobdon Neighbourhood Development Plan

Schedules of Representations in response to Draft Plan, March 2016

Section 3.1

Schedule 1: Community Representations and Responses

Respondent Identification Number	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Suggested Changes Parish Council Consideration (In blue)	Proposed Change Number
C.1 Pearl Lake Leisure Park, Shobdon	Policy S4	Recommend change	<p>Seeks the addition of an area of land to the West of The Paddocks for elderly people’s bungalows. The land is currently part of the Caravan Park. The site has good pedestrian access to village facilities and public transport. It would support facilities at the caravan park. The land does not flood. The site would meet criteria set out in the policy and provide elderly people’s accommodation which is sought. It would add certainty to delivering housing requirements which is currently absent in relation to 3 of the 5 proposed sites and in terms of windfalls. It meets the terms of Core Strategy Policy RA2 and the proportional growth should not be considered a ceiling. The development would comply with Policy S3 criteria (a to d) in that there would be minimal impact on highway with strong public transport and pedestrian access links. Highway access would be through our current entrance; Policy S6 by means of sale through leasehold our proposal would provide low cost accommodation; Policy S7 which we could incorporate and embrace all of the criteria; Policy S8 in that residents would support the local shops and services and be able to use the on park Facilities thereby supporting many local businesses; and policy S10 in that we would be prepared to contribute to the Sewer pipe enhancements.</p> 	See changes Nos 13 and 31

Respondent Identification Number	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Suggested Changes Parish Council Consideration (In blue)	Proposed Change Number
			© Crown copyright and database rights [2015] Ordnance Survey 100054122 (Shobdon Parish Council (Licensee) Licence Number)	
			<p>The site falls adjacent to the previous and proposed settlement boundary and is effectively brownfield land which should be brought forward in preference to greenfield sites. Given the site is proposed by the landowner, it is deliverable. The site is relatively small in an area where recent development has taken place. Development of the site would not adversely affect the character of the village. Although the addition of this site though policy S4 is not necessary to meet and achieve the housing target it would give Herefordshire Council increase confidence that the required number of houses would be achieved through the plan. For the purposes of assessing its contribution to the housing target the site might accommodate around 10 dwellings.</p> <p>NB- Clarification was subsequent sought with the landowner about the exact area that might be included in the plan given the need for shared access arrangements and this is shown in change No 31.</p>	
	Policy S5		<p>The development rate proposed is too conservative. A more positive approach could reduce speculative large number; out of character developments that are currently succeeding because of the absence of a 5-year housing need supply (see Appeal APP/W 1850/W/ 15/3006428 at Leintwardine). It could operate as an unreasonable cap on development.</p> <p>The adoption of Shobdon NP should protect the village from unsympathetic speculative development. The development rate meets the requirements in terms of total number of houses to meet the required target which is for the period 2011 to 2031. It is not unreasonable to seek to enable development over the plan period rather than see an uncharacteristic development form at the start. See also response to representation SH.1 in response to Policy S5.</p>	See Change No 16
C.2 Messrs GH, AJ, EF, KJ Roberts	Whole plan	Support	<p>Welcome the need for the Plan to be prepared in conformity with the Herefordshire Core Strategy and the need to meet the strategic development needs of the area.</p> <p>Noted</p>	No change required
	Para 2.1	Support	<p>Welcome the positive Vision which states that the <i>'Parish will continue as a sustainable, thriving and prosperous community'</i>;</p> <p>Noted</p>	No change required
	Para 2.2 Objective 2	Object	<p>This only relates to the provision of affordable homes but should also ensure delivery of market homes thereby providing for all needs.</p> <p>Ensuring homes are affordable and of the right type is an important objective for the community. Objectives do not need to cover all potential matters and its general meaning rather than 'planning' technical jargon is appropriate in terms of setting an objective.</p>	No change required
	Policy S1	Support	<p>Welcome Policy which promotes a sustainable community and that new homes should meet the breadth of the community needs in terms of size and tenure</p> <p>Noted</p>	No change required

Respondent Identification Number	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Suggested Changes Parish Council Consideration (In blue)	Proposed Change Number
	Para 3.7	Support	Welcome the need to maintain support for Shobdon's village shop, post office, school, pre-school, churches, the airfield and its pub. Noted	No change required
	Policy S2 and para 3.10	Support	Welcome these which identify Shobdon as the principal location for development meeting the needs of the Parish as set out in Herefordshire Core Strategy. Noted	No change required
	Policy S2 ii) and para 3.11	Object and recommend change	These identify three hamlets of Ledicot, Easthampton and Uphampton as suitable to meet local housing needs and provision of infill opportunities. This is contrary to the Core Strategy which regards these areas as open countryside where development is limited to specific proposals as set out within Policy RA3. The SNDP does refer to Policy RA3 but then appears to further relax the policy approach through identification of the three hamlets and the allowance of infill and provision of housing to meet local needs. It is recommended that the SNDP is reworded to provide greater clarity in Policy S2 reconfirming that Shobdon is the principal and only focus for housing growth in the Parish and that anything outside of the village must comply with Policy RA3. The policy does not relax the requirements of Herefordshire Local Plan Core Strategy Policy RA3. The approach seeks a preference for any dwellings, such as those in association with a rural enterprise within the hamlets mentions to be located as infill if possible, although does not restrict this. This would maintain their character. In addition, the approach also supports Herefordshire Historic Farmsteads Characterisation Project which Historic England is promoting to local communities for inclusion in their neighbourhood plans. However, given the concerns and others in relation to clarity a change is proposed to remove the final element of the policy to avoid potential duplication.	See change No 10
	Para 5.1	Support	Welcome recognition that the housing figure provided 'is a minimum' requirement; Noted	No change required
	Section 5, Policy S4, and para 5.6	Object	It is not clear how the sites evolved, how Herefordshire Council's SHLAA has been taken into account, and there is concern about the collective ability to deliver 30 dwellings. There is concern that over 25% of the target requirement is directed to sites in the open countryside thereby undermining Shobdon's role as the focus for development. The Steering Group preparing the plan was aware of sites put forward within the SHLAA. It noted firstly the analysis in terms of whether sites were constrained or had no potential and secondly that the analysis was for strategic purposes to show whether the Core Strategy Housing Policies could be delivered or not. It was also aware that the SHLAA was not nor never intended to be an indication of whether a site or sites should be proposed for development. The sites chosen were identified in terms of whether they were developable and an indication of whether they were available confirmed. This is the standard requirement and approach common to the plan making process and it was understood this did not need to be explicitly stated. In addition, sites were proposed on the basis of whether they met the community's concern that having recently received a large	No change required

Respondent Identification Number	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Suggested Changes Parish Council Consideration (In blue)	Proposed Change Number
			<p>development on its edge, a series of small sites would be appropriate for the next stage in the village's evolution, should such sites be available. Sufficient sites were available to meet this objective.</p> <p>The required housing target does not rely upon a 25% rural windfall allowance. The housing target is 44; between 2011 and the time the plan was drafted 10 new dwellings had been built and a further 8 had received planning permission; the plan proposes sites for around 30 new dwellings – Total 48 new dwellings. This exceeds the target requirement without taking into account any rural windfall allowance of 12 which would add further to this total. Hence the approach does promote Shobdon's role as a focus for development.</p>	
	Para 5.5	Object	<p>This paragraph indicates sufficient 4 bed homes have already been provided and does not reflect the evidence for Kington Housing Market Area.</p> <p>The paragraph does not do this. It presents the view expressed by local residents through a survey. The paragraph is explicit in indicating that further planning permissions should reflect the balance in terms of housing mix and range set out for Kington Housing Market Area as indicated by Herefordshire Council's Local Housing Market Assessment 2012 Update.</p>	No change required
	Policy S5	Object	<p>The policy is inflexible and is not positively prepared. The justification is the lack of capacity within local infrastructure (primary school, sewers, treatment works etc.). All applications will need to robustly demonstrate that future developments can be accommodated locally. A phasing policy is not required as part of this. The phasing policy refers to 8 dwellings being provided every five years within Shobdon village over a 20-year period. There is no explanation for the 8 dwellings plus there is only 15 years left of the plan period meaning only 24 dwellings would be permitted. This falls short of the 30 dwellings plus for Shobdon Village and does not account for the fact that these figures should be regarded as a minimum. The phasing policy is therefore putting an unreasonable cap on development. This policy should be removed and the market be left to deliver houses when they have confidence in the local market.</p> <p>The figures have been adjusted to cover the remaining 15-year period and take account of a further housing allocation. It is considered reasonable to seek to enable development over the whole of the plan period rather than just at the beginning. See also response to representation SH.1 in response to Policy S5</p>	See change No 16
	Para 5.6 – New site	Recommend change	<p>To increase certainty on meeting the minimum housing requirement, amend the settlement boundary, on the eastern edge of Shobdon to include 0.6 hectares of land south of New Cottages. It is a highly sustainable and deliverable development opportunity, adjacent to and well related to the built form of Shobdon available now to meet the housing needs of the area and support the village's services. The Council's 2012 Strategic Housing Land Availability Assessment (SHLAA) identified the site, under the name of Lower Ledicot Farm reference HLAA/307/001, as being available, suitable and achievable for residential development. Technical work confirms that the site can be accessed to adoptable standards off Ledicot Lane with suitable visibility splays achievable onto the B4362. The site is of a proportional size, forms a logical rounding off of the settlement and is able to deliver a mix of properties including family homes and homes for the elderly to meet the requirements of Policy S4. Any future scheme will ensure that it preserves and enhances the character of the area, protects amenity of adjacent properties, provides appropriate car parking and retains hedgerows, providing sufficient garden space. A future</p>	No change required

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			<p>scheme will also be informed by technical reports to ensure it addresses the infrastructure issues raised in the SNDP.</p>  <p>© Crown copyright and database rights [2015] Ordnance Survey 100054122 (Shobdon Parish Council (Licensee))</p>	

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			<p>Herefordshire SHLAA identified this site as having significant constraints. Notwithstanding this, the development of this land would have a significant adverse effect upon the character of this end of the village. Development at its eastern end reflects the historic parkland estate village character which is strongly evident as you pass through this part of the settlement. Here it is predominantly frontage development along the village street with residential curtilages extending at a fairly consistent depth. At this point the English Heritage Registered Historic Park and Garden fronts the main road on the opposite side of the road and village street. Its setting would be adversely affected and development would therefore compromise policy S15 i).</p> <p>The required housing target has been met and exceeded through housing allocations elsewhere. Better alternative sites would have been sought if a deficit had been identified.</p>	
C.3 G M Preece	Whole Plan	Support	<p>Thanks for all the work put into such a comprehensive plan. Large developments tend to destroy the whole idea of a village. I agree with small housing sites and consider the facilities could not cope with anything larger.</p> <p>Noted with thanks</p>	No change required
C.4 G and E Pardoe	Policy S3	Comment	<p>Houses at Bar Meadow already have lots of problems including lack of the pathway to get to the village. There is also noise from heavy transport.</p> <p>Any noise from transport has not deterred the development of housing within the village or proved to be a serious issue for Bar Meadow. Footpath requirements would need to be met in accordance with Herefordshire Council's standards.</p>	No change required
	Para 5.6	Object	<p>Would like to see the Noise Impact Statement under BS4041 and to know why the field in front of Bar meadow was being surveyed.</p> <p>There is no record of previous developments in this location requiring a noise survey. The Steering Group is unaware of any surveys on the land. There is no requirement for any authorities to be notified of land surveys by any land owner.</p>	No change required
	Policy S14/para 5.6	Object	<p>The view from Bar meadow is one of the few vistas that Shobdon has. If new building is allowed it would spoil the view. Bar Meadow is for older people and many can't get out. They will have to look at more bricks and nothing else.</p> <p>Shobdon village is such that finding sites to meet the housing target set by Herefordshire Council is likely to affect the views of nearby residents. The effect of development upon private views is not a material consideration when making decisions upon where development should take place. Policies S4 and S7 set out details about how development should take place in order to protect amenity and other environmental aspects.</p>	No change required
C.5 W Hall	Section 5	Comment	<p>Consideration needs to be given to infrastructure in the village and surrounding area where there is already high traffic volume; doctor's surgery under pressure and the school not able to cope.</p>	No change required

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			Herefordshire Council has indicated that Shobdon must accommodate a minimum level of housing over the period 2011 to 2031 and the providers of services such as the highway, health and education authorities were consulted upon this and have not objected. Consequently, the plan must make appropriate provision. However, the plan seeks to accommodate the level of development in a way that helps service providers to bring forward any necessary improvements in services and their facilities by promoting an approach based upon steady growth.	
	Policy S4 and para 5.6 iii)	Object	Development on this site would adversely affect my property; it contradicts previous advice and has an elevated position. Shobdon village is such that finding sites to meet the housing target set by Herefordshire Council is likely to affect the views of nearby residents. The effect of development upon private views is not a material consideration when making decisions upon where development should take place. Policies S4 and S7 set out details about how development should take place in order to protect amenity and other environmental aspects. No advice has been received from any public body which suggests there is any conflict with any previous advice. The site's location reflects the elevated nature of many developments along the south side of the village.	No change required
	Policy S13 and para 7.11 iii)	Object	This (local green space either side of the stream passing under Shobdon Bridge on the north side of the main road) should not be local green space but used for housing. It already has a property upon it. This proposal continues the protection afforded to that area in Herefordshire Unitary Development Plan and previous planning policy documents. It is not a new proposal. It maintains the connection between the village that has its roots as serving Shobdon Park estate and is therefore important to Shobdon's character and history.	No change required
C.6 Mr and Mrs G A Pritchard	Policy S4 and para 5.6 ii)	Object	Development would destroy our view and privacy. The ground holds a lot of water which may cause problems for building and even our ground never drains away in excessive rain. The site is close to the airfield and there is a safety issue should an aircraft come down. Shobdon village is such that finding sites to meet the housing target set by Herefordshire Council is likely to affect the views of nearby residents. The effect of development upon private views is not a material consideration when making decisions upon where development should take place. Policies S4 and S7 set out details about how development should take place in order to protect amenity and other environmental aspects. Policy S10 seeks to ensure surface water drainage is addressed fully and this is also covered by the Building Regulations. Advice indicates that the manager of Shobdon Airfield should be consulted in order that comments might be forwarded upon whether the plan affects safety, risk and other operational matters. No advice indicating there are any difficulties in these respects has been received.	No change required
C.7 T J Mustoe	Policy S4 and para 5.6ii)	Object	Development would affect the view and be like Leominster with houses all around. It will spoil the countryside feel. Shobdon village is such that finding sites to meet the housing target set by Herefordshire Council is likely to affect the views of nearby residents. The aim is to avoid further large scale developments that would further diminish the village atmosphere. The effect of development upon private views is not a material consideration when making decisions upon where development should take place. Policies S4 and S7 set out details about how development should take place in order to protect amenity and other environmental aspects.	No change required

Respondent Identification Number	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Suggested Changes Parish Council Consideration (In blue)	Proposed Change Number
	Section 5	Comment	<p>There is a need for real affordable houses for young people. Grandchildren had to move away because no suitable property. Am sure there are others that have had to do so. Need houses that young people can afford and not too big.</p> <p>The approach is based upon providing small sites to accommodate a range of accommodation, in particular for the elderly and young families. The sentiment expressed is appreciated and acknowledged. There is provision to provide affordable housing as an exception to the policies in this plan should any such need not be provided for and a need established to the satisfaction of such housing providers.</p>	No change required
C.8 CA and JM Wilkinson	Section 4; Policy S3	Comment	<p>Appreciate the line markings on Hillhampton Road junction which should help safety. It is still dangerous at certain times. Traffic still going too fast from the Presteigne direction. Reduced speed limit badly needed.</p> <p>These points are noted and will be forwarded to Shobdon Parish Council to take up with Herefordshire Council under Policy S3.</p>	No change required
C.9 Mrs Preece	Policy S11; para 7.6	Comment	<p>Need more play equipment at the park. It is the one and only play area and used a lot. Could the access to the park be relocated to be from the car park?</p> <p>These points are noted and it is understood Shobdon Parish Council is looking at access to be through the car park in addition to additional play equipment. This is matter of implementation and Policies S11 and S13 would be relevant. No additional policy would be necessary should the parish council wish to pursue such proposals.</p>	No change required
C.10 J Andrews	Section 2	Recommend change	<p>Provided a redraft of the whole section in order to improve clarity.</p> <p>2 Vision and Objectives</p> <p>2.1 In preparing the Shobdon Neighbourhood Plan, and following consultations with the village, the community developed the following vision: That the Parish of Shobdon will continue as a sustainable, thriving and prosperous community, supporting a high quality of life for all its residents, with a balanced population and with a distinctive settlement at its core, exhibiting vitality and dynamism. This means that any new development must benefit the whole community and has to be accommodated in ways that meet changing circumstances, especially environmental, social and economic needs, while preserving the areas of historic heritage, its natural environment and the local greenspace (landscape?). The rate at which such development takes place must ensure that new residents can be absorbed into the community without overwhelming its values and character.</p> <p>2.2 In developing this vision, the community was consulted to establish a number of the objectives which the Neighbourhood Plan should include. The following were agreed as a basis for assessing any proposals, and also forming the community's development management policies: Objective one (roads and traffic) To address the following traffic issues in particular: (i) the speed of vehicles through the village; (ii) the effect of traffic noise on the community; (iii) the need for safer access by pedestrians and cyclists to local services and facilities, and (iv) to campaign for better road maintenance throughout the parish.</p>	See changes 7, 8 and 9

Respondent Identification Number	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Suggested Changes Parish Council Consideration (In blue)	Proposed Change Number
			<p>Objective two (houses) To provide a range and choice of affordable new homes to meet the needs of all sections of the community, the new homes being spread in different parts of the parish, and all providing a pleasant environment. These homes will be built in small numbers with the density respecting and enhancing the character of the parish.</p> <p>Objective three (employment) To maintain a thriving local economy by ensuring that employment and enterprise opportunities are available for local people. Appropriate business will be encouraged to the area by ensuring good Broadband reception, and adequate local services.</p> <p>Objective four (infrastructure) To support improvements to the infrastructure, in particular to roads and pavements; the continuation of public transport; the upkeep of the sewerage system and surface water drainage; and the updating of Broadband and telecommunication systems. We shall encourage any changes to the infrastructure to be made avoiding the reliance on carbon as an energy source, and by seeking and using alternatives.</p> <p>Objective five (recreation) To maintain and enhance the existing community, sports, recreational and social facilities, and to provide new facilities as required by an increasing population.</p> <p>Objective six (countryside) To protect (and maintain?) the natural and historic environment of the parish, in particular listed buildings and landscape of outstanding natural beauty, by maintain access to these through the public footpath and bridle way network. <i>(Footnotes as text).</i></p> <p>2.3 The work upon, and the content of, the Shobdon Parish Plan prepared in 2014, including a resident's questionnaire, has contributed to the preparation of the Neighbourhood Plan. Together with the above objectives the work undertaken through the Parish Plan has been used to set the framework of, and the content and approach in, this Neighbourhood Development Plan.</p> <p>Redraft appreciated and taken on board where appropriate.</p>	
C.11 G A Quantrill	Para 5.6 iv)	Object	<p>The play area at The Grove is a safe are where children from all over play. The equipment has been taken away but hope new equipment will be brought back. It is an area where older children can play football. And should be kept for youngsters. It should not be built upon.</p> <p>An alternative equipped play area has been provided at Bateman Close and is controlled by the Parish Council for wider use. However, the need to provide a footpath link through to it from The Grove needs to be identified in the plan.</p>	See change No 28
	Section 5 (Housing)	Comment	<p>Need 'real' affordable housing for young people. There are no suitable properties for relatives who want to stay in the village. Houses should be built that local people can afford, not big unrealistic place.</p> <p>The emphasis placed on new housing in the plan is to provide smaller houses for local young families.</p>	No change required

Respondent Identification Number	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Suggested Changes Parish Council Consideration (In blue)	Proposed Change Number
C.12 H Weale	Whole Plan	Support	A comprehensive plan which will met the needs of Shobdon in the future. Comment welcome	No change required
C.13 K Sleton	Para 5.6	Object	Wrong to develop Grove Field. It is an essential recreation area for residents of The Grove. It is used to exercise dogs, to play football and build dens. It is conveniently located between two housing developments and the path should be opened up to allow access from Batemans's Close, enabling even greater use. There are a large number of children on both estates and the area is ideal and safe place to let off steam. An alternative equipped play area has been provided at Bateman Close.	No change required
	Policy S7 and para 5.14	Comment	New affordable housing should be constructed to high levels of thermal efficiency above the building regulation requirements. Dwellings should be built to passive house standards community housing schemes and self-build should be encouraged rather than housing by developers. Rainwater harvesting should be incorporated to minimise surface water run-off and reduce strain on soakaways and drainage systems. Policy S7 contains criteria to cover sustainable design. However, it needs to be recognised that Government has indicated energy and water conservation measures should not generally go beyond what is set out in the Building Regulations.	No change required
C.14 A Holford	Para 5.6 ii)	Question	If land south of Bar Meadow is developed can we be assured that the mature oaks will remain and be protected? It is unlikely that any development would affect this tree but should this be the case Policy S7 indicates that important trees and other features that contribute to the village's character should be retained. The Planning Acts have a specific requirement for the local planning authority to consider making TPOs on development sites.	No change required
	Para 5.6.iii)	Question	Will the trees surrounding the area be retained and protected? Policy S7 indicates that important trees and other features that contribute to the village's character should be retained. The Planning Acts have a specific requirement for the local planning authority to consider making TPOs on development sites.	No change required
	Para 5.6.iv)	Question and request.	Front gardens to the south east already flood so what are the plans for run-off? There needs to be a plan for the Sewage Works. Building Regulations require sustainable drainage measures to be provided for developments. Policy S7 requires this to extend to accommodate neighbouring development where this is necessary because of storm water flooding. It is understood that the Sewage Treatment works is sufficient for the required level of development. The problem relating to the sewerage system is however recognised and Policy S10 coupled with the phasing of development through Policy S5 addresses the need to tackle this particular issue in association with any housing development	No change required
C.15 J Higgins	Policy S4	Question	How will the site to the east of the Primary School be accessed? It appears this will be through Hanbury Green. If so part of my garden may be required and destroyed. I need this to be clarified. Following a review, it is recognised that the site off of Hanbury Green should not be considered available in that there remains uncertainty that an appropriate access will be achievable. It might be possible to provide a private drive but this is by no means certain. Consequently, the site should not be allocated although the settlement boundary might remain as proposed. Should it be possible to achieve an appropriate access the site might come forward as a windfall. However, the site cannot be considered to contribute towards meeting the required	See Changes Nos 15 and 31

Respondent Identification Number	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Suggested Changes Parish Council Consideration (In blue)	Proposed Change Number
			housing target. An alternative site is however proposed as a consequence of representations received that will more than replace this loss. It is nevertheless considered that the settlement boundary should be retained in that it maintains a consistent depth on the south side of the village should it be possible to bring forward the area concerned.	
C.16 Mr and Mrs Robinson	Para 4.2	Comment	Speed of traffic in 30 mph zone – perhaps a speed camera instead of ‘Your Speed’ sign would stop drivers doing up to 64mph through the village. Dog fouling is getting out of hand. The comment is noted and the issue raised will be taken on board in any discussions about further traffic management measures that might be introduced. Dog fouling is not an issue that can be covered by the Neighbourhood Plan. However, this is a matter that the Parish Council regularly reviews in order to consider what measures might be possible to address this.	No change required
C17 R Adams	Policy S3	Comment	HC has vetoed any traffic calming measures in the village. And therefore anything to improve the air quality through the village will be slight. Walking the footpath between the shop and the Bateman’s Arms is like walking on a motorway hard shoulder. Pavement parking is also a problem, particularly with HGVs. The comment is noted and the issue raised will be taken on board in any discussions about further traffic management measures that might be introduced.	No change required
	Policy S8	Comment	Local business does little to help the village, particularly aggregate trucks that drive at dangerous speeds through the village. Policy S3 seeks to address so far as it is possible all traffic issues. Policy S8 refers to scale of business development, protection of residential amenity, and the effect development might have on the local highway network. These criteria would need to be met in order for any proposal to proceed.	No change required
	Policy S12	Comment	The chance of getting any decent broadband in the village is nil. Policy S12 of the Neighbourhood Plan supports the provision of infrastructure necessary to enable high speed broadband to be brought to the parish. The relationship between BT, Government and Herefordshire Council is not a matter for this plan	No change required
C.18 J Bownes	Para 5.6	Suggest change	Instead of proposing good agricultural land for development, use the land opposite Hanbury Green which would cause far less disruption. The field adjoining the road already has a dwelling on it which has not been lived in for over 20 years. This and adjoining fields have not been used for agriculture except cutting and bailing of grass once a year. Policy S14 continues the protection afforded to that area that was provided in Herefordshire Unitary Development Plan and previous planning policy documents. It is not a new proposal. It maintains the connection between the historic estate village that has its roots in serving Shobdon Park estate and is therefore important to Shobdon’s character and history. Grassland can have environmental benefits in terms of biodiversity. There is no intention to stop the existing bungalow from continuing to be used of for its replacement with another dwelling that sits within the existing curtilage and ensures the character of the space is retained.	No change required
C.19 D and D Sayers	Whole Plan	Comment	Comprehensive piece of work Comment welcome	No change required

Respondent Identification Number	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Suggested Changes Parish Council Consideration (In blue)	Proposed Change Number
C.20 M Whitby	Para 5.6	Object	This is a quiet area occupied by elderly people who get on with each other. Unless built for a similar age group the new houses would destroy this harmony. The ground is a bank with a large hollow that fills with water at various times. There is a large oak tree that should not be harmed and reduces the area. the sewage system is at its limits.	No change required
			Protection from the effects of development upon the amenity of adjacent residents is provided through policies S4 and S7 which covers this and other environmental aspects. The site's location reflects the elevated nature of many developments along the south side of the village. Building Regulations require sustainable drainage measures to be provided for developments. Policy S7 requires this to extend to accommodate neighbouring development where this is necessary because of storm water flooding. This should be sufficient to ensure any flooding of the hollow is taken into account if necessary. Policy S7 indicates that important trees and other features that contribute to the village's character should be retained. The Planning Acts have a specific requirement for the local planning authority to consider making TPOs on development sites.	
C.21 D and M Bray	Section 4, Policy S3	Comment	The roads need to be improved especially going out of the village towards Mortimer's Cross Policy S3 indicates the Parish Council will work with Herefordshire Council to address such issues and seek to bring forward appropriate measures. The concern expressed will be taken on board for such discussions and hopefully address them with appropriate measures	No change required
	Section 5	Comment	Agree there should be more affordable housing in the village but why put them in the already built up areas? Herefordshire Local Plan Core Strategy requires new housing to be within or adjacent to the built up area of the settlement. Residents expressed a wish for small sites to be proposed if possible. The sites indicated are considered the most appropriate bearing in mind these requirements.	
C.22 M Carmichael	Whole Plan	Comment	The Steering Group have put together a very comprehensive plan taking into account villagers' comments and concerns.	No change required
			Comment welcome	

Section 3.2

Schedule 2: Stakeholder Representations and Response

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Comment Parish Council Consideration (in blue)	Amendment Number
SH.1 Herefordshire Council (Statutory Consultee)	Whole Plan	Comment	This Plan is well written with well researched / evidenced policies; it can clearly be seen that the policies have taken into account the requirements of the local community. It takes a positive approach towards identifying housing sites and it would seem that there is sufficient opportunity within the settlement boundary to meet the minimum growth target for the parish. In general, the plan is positive in its promotion of road safety and improving sustainable transport links. Noted	No change required
	Policy S1 c)	Comment	Encouraging to see this but there is a lack of detail on how this will be achieved and implemented – types of end use and associated employment opportunities to be determined. This policy sets out the strategy for the plan, in similar terms to the SS policies in Herefordshire Core Strategy. Where necessary they are covered in more detail later in the plan. In relation to the local economy, Policy S2 refers specifically to supporting agriculture, including diversification, and small scale tourism activity. Policy S8 provides greater detail. The policies should be read together as this the case for most planning policies within the Development Plan. It is not considered appropriate to be more specific about particular employment types as this reduces flexibility. Criteria are used to cover scale, protection of amenity and other considerations and this is considered the most appropriate way to determine whether a proposal is appropriate. Herefordshire Local Plan Core Strategy does not suggest anything more specific for its rural areas in terms of employment type.	No change required
	Para 3.4	Comment	Note comment in relation to the community's view of the B4362. However, no alternatives have been proposed in light of future development. Herefordshire Council has not proposed any highway works to address the issue of traffic travelling along the B4362 either within Herefordshire Local Plan Core Strategy or Herefordshire Local Transport Plan. Herefordshire Council has indicated the level of development that the village must accommodate but given no advice upon how either the current or future traffic levels and associated effect on the safety and amenity of residents might be tackled. The approach proposed is therefore to work together to try to address the problem.	No change required
	Para 3.13	Recommend change	It would be worth the group considering a set of criteria to consider potential applications around the change of use of redundant farm buildings or disused rural buildings to a commercial end use. These too can support additional employment provision and safeguard jobs through farm diversification. Policy S8 v) refers specifically to the conversion of rural buildings to employment uses.	No change required
	Policy S2	Recommend change	Points ii and iv seem very similar to each other as they cover areas outside of Shobdon and therefore related to RA3. Agreed.	See Change No 10
	Policy S3	Comment	i) We would ideally like to have specific requests within the plan to improve the transport issues within the village. These could then be reviewed and developed through Section 106 agreements, if feasible. These could include pavements, cycleways, village gateway features and traffic calming.	i) No change required
				ii) See Change No 12

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Comment Parish Council Consideration (in blue)	Amendment Number
		Recommend change	<p>ii) Add new criterion 'b) active travel is encouraged and promoted with suitable infrastructure both within in and around the development;'</p> <p>i) Policy S3 presents such a request and paragraph 4.3 specifically refers to traffic calming measures.</p> <p>ii) It is difficult to conceive how provision for active travel can be made in the village and rural parts of the Parish However the principle is supported.</p>	
	Paras 5.2 and 5.9 and Policy S11		<p>With the level of housing growth projected it would appear unlikely that developer contributions will make a significant impact on community services, transport enhancements, broadband infrastructure and sewerage treatment works which have been flagged as important. Consideration should be given to alternative ways to fund infrastructure improvements or permitting larger scale developments.</p> <p>The CIL consultation currently being consulted upon appears to provide for higher levels of contributions for smaller developments than for large developments so this representation appears contradictory. Herefordshire Council has not sought to support local facilities when previously granting planning permission for a large scheme within the village despite its planning Obligations SPD. Alternative sources of funding may be available but not material to Policy S11 which is a planning policy.</p>	No change required
	Paragraph 5.6	Suggest change Recommend change Comment	<p>i) 2nd Sentence remove 'in particular' to aid clarity</p> <p>ii) Is it worth including these 5 sites within the policy and providing more detail on them as they are allocations</p> <p>iii) The five 'housing sites' have all 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. Homes may be considered 'sensitive' and as such consideration should be given to risk from contamination. Reference is made to the pertinent parts of the NPPF and the requirements and meanings given when considering risk from contamination during development. 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.</p> <p>i) Agreed</p> <p>ii) This suggestion is welcomed.</p> <p>iii) There remains some doubt about previous uses and whether they were orchards when spraying was undertaken. However, given the concern, reference to protecting potential residents from contamination might usefully be added to policy S4</p>	<p>i) See change No 15</p> <p>ii) See changes Nos 13 and 15</p> <p>iii) See change No 13</p>
	Policy S5	Objection	Limiting phasing to an exact figure is too prescriptive, is contrary to the housing supply policies of the Core Strategy and the National Planning Policy Framework, is in conflict with the presumption in favour of sustainable development, can be	ii) See Changes Nos 16 and 17

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Comment Parish Council Consideration (in blue)	Amendment Number
			<p>difficult to enforce as build rates will often vary greatly to planning approval rate. For example, a planning application may be approved but not built for 5 plus years, or it could be built straight away. I would like to draw your attention to the Wellington examiners report as he removed the phasing element in policy W2, states that 'it has the effect of restricting development and represents an inappropriate constrained approach to sustainable development. Two proposed sites are capable of accommodating more than 8 dwellings. Their development is likely to be inhibited by this policy. It will not be cost effective for developers to partially develop what are still small sites in order to comply with policy. The process of limiting development to a small number over a five-year period will also mean that affordable housing is not delivered. Policy H1 of the Core Strategy effectively means that developments of less than 10 dwellings will not be required to provide affordable housing. The effect will be no affordable housing for the village. Suggest that the phasing relates to the sites themselves rather than to limit the number of dwellings to be provided in any one period. An anticipated or preferred set of timescales in which the different identified sites in Shobdon should come forward for development could be defined. This could be based on a range of factors such as availability, key constraints, or where sites rank among one another in terms of suitability for development. This could help to give some order to proposals being put forward on the sites, making development that is phased over time more achievable. This should, however, come with the flexibility of allowing lower ranking sites to be brought forward ahead of higher ranking ones should the latter not come forward as early in the plan period as anticipated.</p> <p>Development rates have been used in other neighbourhood plans e.g. Upper Eden Neighbourhood Development Plan. No references can be found in Herefordshire Local Plan Core Strategy that would restrict the use of such a policy especially as the strategy covers the period 2011 to 2031 and consequently it must be presumed that the target housing figure is set for that 20-year period. The representation seems to suggest that an approach should be adopted so that all development should take place within the first five years and this would be contrary to the strategy based on sustainable development across the county. This policy seeks to ensure overdevelopment does not undermine the strategic policies of the Core Strategy while also ensuring that the relative size of the settlement evolves over the period of the plan. It also seeks to ensure that the strategy to concentrate development within Hereford City and the market towns, which are the most sustainable locations, is not compromised by excessive building in the villages. The size of sites included in this neighbourhood plan avoid larger developments that would change the character of a settlement, as smaller developments are more likely to help retain the character of the settlement. As Shobdon is a focus for development, a small but steady development rate within Shobdon village comprising a number of small development sites is considered preferable to a single larger development that would further erode village character adding to the already notable level of alien features such as suburban estate roads, street lighting, homogenised design styles and materials. Hence a phasing policy supports the concept of sustainable development across the County. There is no pent-up demand for housing within the village in that it has already received a significant housing development at its western end through a large site allocated in the former Herefordshire Unitary Development Plan which has come forward and is now complete.</p>	

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Comment Parish Council Consideration (in blue)	Amendment Number
			<p>The policy is flexible in that it allows for variations from the suggested rate, although given the Council's concerns this may be made clearer and flexibility increased further to take into account a number of sites are larger than the suggested development rate. The suggestion that phasing relates to the sites themselves and the types of factors that might be considered is useful although given the proposed increase in sites it is now possible to show that one medium and one small site could come forward within each 5-year period. There should however be a general presumption that any allocated housing developed within Shobdon should not exceed a general quinquennial development rate set for the remaining 15-year period of the plan. Flexibility is added by not utilising an annual rate and by affording the opportunity for variation from this. The provisions that allow for a higher development rate in each period are expanded to increase flexibility further.</p> <p>The effect of this policy on affordable housing is largely irrelevant. It is clear that Herefordshire Local Plan Core Strategy policy for affordable housing will generally not greatly benefit villages if at all where neighbourhood plans have been prepared. Developers, even on larger site allocations can themselves bring forward land in phases of 10 or less dwelling (Core Strategy policy H1). Consequently, there will have to be greater reliance on Core Strategy Policy H2.</p> <p>The evidence for variation from the proposed phasing and the supply of 'affordable' housing from Housing Needs surveys or other indicators of need should be taken into account. The Parish Councils will be well placed to offer advice to Herefordshire Council on suitable rates of development from time to time. It is considered that the view of the Parish Council as to the acceptability of any development proposal in relation to whether the development rate for that parish has been breached or is likely to be breached, may be exceeded or may not be exceeded should carry significant weight in any decision that the Local Planning Authority may take.</p>	
	Policy S8	Comment	<p>The premise of the policy is sound. The first criterion is far too generic. There are existing businesses in the local area that do not reflect the rural character of the area in terms of their scale and this part of the policy seems to preclude their further expansion.</p> <p>The NDP is rather contradictory in the sense that development near the airfield is encouraged, but the plan indicates that heavy traffic is a major issue within the area. Development is likely to increase the number of heavy vehicles in the area. This new development will need to be carefully managed to mitigate the impacts on the area.</p> <p>No further employment land is identified within the plan/map. Where will future employment opportunities arise? Are local companies looking to expand? Is there existing commercial stock to allow businesses to move to Shobdon.</p> <p>If traffic levels are not to be impacted as a result of growth what alternative transport provision has been made?</p>	No change required

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Comment Parish Council Consideration (in blue)	Amendment Number
			<p>Herefordshire Council does not identify Shobdon Airfield as a strategic location for employment in its Core Strategy. It suggests that the majority of premises upon and around the airfield that fall within Shobdon Parish are of poor quality. Although the Core Strategy does not necessarily seek the continuation of such sites/premises for employment they are not within or adjacent to Shobdon village. Consequently, the plan suggests they should continue in such use but would benefit from their enhancement. Paragraphs 6.1 to 6.5 explain the constraints upon the airfield and elsewhere within the parish, principally being heavy traffic using an inadequate highway network. This network and its limited capacity is as a consequence of its rural character. The issue of scale is therefore important (criterion i)) in that currently access along the B4362 runs through the village and is a significant problem. The alternative would be for traffic to travel along the A44 through Pembridge village and there are considerable problems with that to the extent that a bypass was mooted in the past for that settlement. Pembridge Parish Council has made representation in relation to this plan emphasising that any further encouragement to business on Shobdon airfield in particular should not result in increased traffic through its village. This is not inconsistent with Herefordshire Local Plan Core Strategy. It should be noted that with the exception of the airfield operating facilities the major businesses on Shobdon Airfield, such as Kingspan and Supercraft do not fall within Shobdon Parish but within Pembridge Parish. Hence as a consequence the Parish Council remains of the view that the scale of any further development should respect the fact that of Shobdon as a rural parish and it is not being inconsistent within the policy.</p> <p>Again it is reiterated that the development to be encouraged near the airfield is the enhancement of existing premises. As an alternative, live/work units is suggested as these would be small and light industrial in nature, and unlikely to generate significant heavy goods traffic.</p> <p>Local firms were consulted prior to preparing the plan and they are generally conscious of the constraints and effect that further significant expansion would have on the community. Future new employment opportunities away from the airfield may arise and be judged against the policy criteria which include scale being consistent with the rural nature of the Parish.</p> <p>The plan is unable to make any alternative transport provision – it is not the local highway authority but a Parish Council. Neither Herefordshire Local Plan Core Strategy nor the Local Transport Plan indicates the provision of any road proposals to serve any existing or proposed employment area within the Parish.</p>	
	Policy S11	Comment	<p>This policy is far too general and needs to be re-worded to make it clear that contributions will be required to mitigate the impacts of the development. The way the policy reads at the moment simply suggests that pre-existing needs / desires have been identified by the community and that development will be required to contribute towards a 'wish list'. Such an approach is not compliant with regulation 122 of the CIL Regulations. There appears to be a cross between a S106/CIL policy and a New Community Facilities policy. It may be beneficial to re-order this policy to cover development for new or additional community facilities at the start including the criteria, then detail that CIL may be able to deliver some of the community facilities requirements.</p>	See Change No 26

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Comment Parish Council Consideration (in blue)	Amendment Number
		Recommend change	<p>Protection/Retention of existing valued community assets is also important. Have these been identified?</p> <p>Add new criterion 'e) measures that encourage and promote active travel to and from the facility are included'</p> <p>It is understood that CIL contributions can be spent by the Parish/Town council on the provision, improvement, replacement, operation or maintenance of infrastructure (such as open spaces, village halls, leisure facilities, schools etc.) or anything else that is concerned with addressing the demands that development places on an area</p> <p>In addition, it is understood Herefordshire Council's Planning Obligations SPD makes provision for development to contribute towards facilities such as education and libraries as a consequence of new development. The introduction to policy clearly states that the contributions are 'appropriate facilities to meet the needs of community in order to accommodate new development'. Currently no CIL is in operation but there is a proposal to introduce this at some stage during the plan period. Consequently, the policy covers both measures. The second sentence in the policy clearly refers back to 'these community facilities'. However, for clarity, it is proposed to change 'accommodate new development' to 'address the demands that development places on the area'.</p> <p>Paragraph 7.6 describes existing and needed community facilities</p> <p>The suggestion to reorder of the policy is helpful.</p> <p>The suggestion to include a new criterion relating to active travel is welcome.</p>	
	Para 7.8	Comment	<p>With the lack of planned housing growth and associated S106 and CIL monies businesses may need to look at alternative ways of funding satisfactory broadband. Suggest visiting http://www.fastershire.com/fastershire-your-world/faster-business for information on applying for the business bursary. Should any larger scale developments be permitted in the future it is important to stipulate that broadband infrastructure should be mandatory.</p> <p>This paragraph sets the scene from an analysis of local views from residents and businesses. It does not relate to the use of S106/CIL money or other funding. The associated policy firstly relates to how planning proposals, where required, for any infrastructure to support broadband and mobile communications will be considered, and secondly the detailed requirements in relation to broadband that developers should include in any scheme.</p>	No change required
	Policy S12	Comment	<p>Concern that Policy S5 is very prescriptive approach to phasing would mean that the aim of this policy not cost effective for developers and thus the effect will be to limit growth over the plan period.</p> <p>No relationship between this policy and Policy S5 is discernible and therefore the representation is not understood.</p>	No change required
	Policy S13	Recommend change	<p>Local Green Space needs to be included in the title alongside 'open space' or have a separate policy for Local Green Space as it is different to open space</p> <p>Advice welcome</p>	See change No 27

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Comment Parish Council Consideration (in blue)	Amendment Number
	Policy S14 (c)	Question	Are the important views identified on a map to help aid clarity and the decision makers? The views have not been identified and are likely to be considerable. Like many environmental features and characteristics these would be assessed at such a time as a planning application comes forward. This is not unusual and applies equally to many policies in Herefordshire Local Plan Core Strategy. The essence of the local interest of this particular part of the policy is to indicate the importance views associated with the Mortimer Trail which is not highlighted in the Core Strategy. Another example of the approach is that akin to the duty in relation to conservation areas. It is good to have an appraisal but this is not always available as is the case for the majority of such areas within Herefordshire.	No change required
	Policy S15	Recommend change	Use of the term 'opposing development' is contrary to the NPPF's positive approach towards sustainable development. Needs to be re-worded A rewording is proposed as requested	See change No 29
SH.2 Welsh Water Dwr Cymru (Statutory Consultee)	Whole Plan	Whole Plan	Generally supportive of the proposals, objectives and policies set out (in particular Objective 4), but are unable to offer full support for reasons set out in its letter (see below) Noted	No change required
	Para 7.2	Comment	Whilst there have been historical incidents of sewer flooding on the public sewerage network, it is our understanding that these were not due to hydraulic overload. As such, there are no issues with regard to the size of the public sewers at the current time. The local community remains concerned that the issue of leakage from the public sewer has not been fully addressed. It is understood that the pipework is under-sized, having been installed as a temporary measure when then airfield was constructed during World War 2. The issues are understood to be depth and gradient. There is at least a need for monitoring given the proposed housing growth and therefore then policy and approach is considered to be relevant and appropriate.	See Change No 21
	Policy S10	Recommend change	Whilst we applaud the provisions made for sustainable drainage systems (SuDS), 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). We would recommend amending the middle paragraph of Policy S10 to the following in order to ensure clarity: 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). The advice in relation to the Sewage treatment works is helpful and welcome and amendments to supporting text are proposed to take this into account. It is understood that the pipework is under-sized, having been installed as a temporary measure when then airfield was constructed during World War 2. The issues are understood to be depth and gradient. There is at least a need for monitoring given the proposed housing growth and therefore then policy and approach is considered to be relevant and appropriate.	See Change No 24

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Comment Parish Council Consideration (in blue)	Amendment Number
	Para 7.3	Comment	At the present time, there is available headroom at the WwTW to accommodate the foul only flows from the amount of development proposed in the Neighbourhood Plan. We are not aware of any issues with regard to "...leakage from the sewerage system". We do however feel that the recommended amendments to Policy S10 above would future-proof against any unforeseen hydraulic capacity concerns. The advice in relation to the Sewage treatment works is helpful and welcome and amendments are proposed to take this into account. It is understood that the pipework is under-sized, having been installed as a temporary measure when then airfield was constructed during World War 2. The issues are understood to be depth and gradient. There is at least a need for monitoring given the proposed housing growth and therefore then policy and approach is considered to be relevant and appropriate.	See Change No 24
	Para 7.4	Comment	The public sewerage network within Shobdon is predominantly of a separate type – that is, the entire public sewerage network is foul-only with limited infiltration of surface water. As such, it is not for the public sewerage network to accommodate surface water drainage. As previously mentioned we are supportive of the SuDS provisions of Policy S10. Noted. There is no suggestion that the public sewerage network should take storm water.	No change required
	Policy S4	Recommend change	i) Criteria F – We recommend the addition of Policy "S10" to the list of policies to ensure clarity. ii) We recommend the removal of the final paragraph following the list of criteria, for reasons discussed above, under Policy S10. These matters are linked and as the local community remains concerned that the issue of leakage from the public sewer has not been fully addressed.	No change required
	Policy S5	Recommend change	Whilst we are supportive of the provisions of the specific Policy S5, as we have previously mentioned the sewer between The Grove and the WwTW has sufficient capacity to accommodate the foul only flows from the development identified in the Neighbourhood Plan. As such, reference to this at para 5.8 should be removed. Similarly, whilst potential concerns were previously raised in the Herefordshire Water Cycle Study Addendum, as discussed under Policy S10 we can confirm that there is available headroom at the WwTW to accommodate the foul only flows from the amount of development proposed in the Neighbourhood Plan. The local community remains concerned that the issue has not been fully addressed.	No change required
	Para 5.6	Comment	With regard to the identified housing sites, there do not appear to be any issues in providing a clean water supply or connection to the public sewerage network, though off-site water mains / public sewers may be required between the proposed development sites and existing supply / network. Noted	No change required
SH.3 Pembridge Parish Council	Policy S8	Comment	It has been noted that development of business on the industrial estate and airfield will be encouraged. The preferred route for all commercial traffic, including Kingspan is via Shobdon due to the restricted road access to Pembridge. As a result of these developments, Pembridge would be opposed to any extra traffic being diverted through the village (presume Pembridge village) as an alternative condition to meet any extra developments. The concern is shared and is why the policy includes a range of criteria to protect the rural nature of the parish, residential amenity and no detrimental effect on the local highway network. Development that would have a	No change required

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Comment Parish Council Consideration (in blue)	Amendment Number
			significant effect on the amenity of residents of both villages would not be supported as a consequence. It is to be hoped that should Pembridge Parish Council prepare a plan for its area that a similar approach would be taken so that the two Parish Councils might work together to ensure the safety and amenity of their residents.	
SH.4 Historic England (Statutory Consultee)	Whole Plan	Support	Supports 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. Commends 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. 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. Historic England considers it is a good example of community led planning. Noted	No change required
SH.5 Natural England (Statutory Consultee)	Whole Plan	Comment	Natural England does not consider that the proposed plan poses any likely significant risk to internationally or nationally designated nature conservation or landscape sites and so does not wish to make specific comments on the plan. Noted	No change required
	Whole Plan	Comment	However, plan falls into the catchment for the River Wye SAC, Natural England advises that the Parish Council refer to the Nutrient Management Plan for the River Wye and have regard for Policy SD4 of the Herefordshire Local Plan "Waste Water Treatment and River Water Quality". Any housing site allocation must be consistent with the policies laid out in these documents to ensure that water quality targets within the affected rivers are achieved. It is understood that the Sewage treatment Works serving Shobdon is able to accommodate the level of housing growth in the village although there remains concern about leakage from the public sewer. This issue is referred to and an appropriate policy advanced to ensure development does not exacerbate this. The policy would seek to protect the Pinsley Brook (tributary of the River Lugg) which lies to the south of the area considered to leak. Reference might however be made to the Nutrient Management Plan It is however acknowledged that Policy S10 does not cover the effluent effects of development that is not served by the public sewer such as development on Shobdon Airfield and in the open countryside. Consequently, a change is proposed to rectify this omission. This representation has also highlighted the issue that the plan does not seek to duplicate many policies within Herefordshire Local Plan Core Strategy but the Parish Council is happy to rely upon a number that are relevant and should work in association with policies in the Neighbourhood Plan. This might be explained early in this plan.	See Changes Nos 11, 22 and 25
	Whole Plan	Comment	The following issues and opportunities should be considered when preparing a Neighbourhood Plan: <ul style="list-style-type: none"> • Taking opportunities to protect and enhance locally valued landscapes. • Identifying distinctive local landscape features or characteristics such as ponds, woodland • How may any new development proposals respect and enhance local landscape character and distinctiveness. • Policies on new development/sites may identify what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development. 	See Change No 20

Stakeholder	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Comment Parish Council Consideration (in blue)	Amendment Number
			<ul style="list-style-type: none"> • Providing a new footpath through the new development to link into existing rights of way. • Creating a new pond as an attractive feature on the site. • Planting trees characteristic to the local area. • Using native plants in landscaping schemes for better nectar and seed sources for bees and birds. • Incorporating swift boxes or bat boxes into the design of new buildings. • Set out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy. • Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision. • Identifying green areas of particular importance for special protection through Local Green Space designation <p>Policy S13 identifies local green space for protection. Policy S14 identifies areas that should be conserved or enhanced to protect specific landscape views/areas/features; the maintenance of tree cover; the protection and enhancement of natural features such as ponds, orchards and hedgerows. Policy S15 protects the historic landscape character of Shobdon Park. Policy S7 specifically refers to the retention of important landscape features within development sites. Policy S3 seeks increased accessibility and an amendment will include active travel.</p> <p>It is however recognised that there is an absence of a policy requirement to integrate such environmental features into an integrated design and consequently a change to incorporate this is proposed.</p>	
	HRA Sections 8.4 and 8.5	Recommend Change	<p>The HRA refers to the River Wye downstream of the confluence of the River Lugg. Amend to reflect the correct section of the River. Wye SAC. The Shobdon parish is within the River Lugg sub catchment- i.e. the River Lugg upstream of the confluence with the River Wye (NB this advice is to Herefordshire Council who prepares the HRA)</p> <p>NE has forwarded this comment to Herefordshire Council and relates to the Habitat Regulations Assessment. It is unlikely to affect any policies or statements within the Plan itself</p>	No change required
SH.6 Environment Agency (Statutory Consultee)			<p>NO RESPONSE RECEIVED</p> <p>No response suggests happy with plan or no adverse comments to make</p>	No change required
SH.7 Highways Agency (Statutory Consultee)			<p>NO RESPONSE RECEIVED</p> <p>No response suggests happy with plan or no adverse comments to make</p>	No change required

Section 3.3

List of Alterations (First Iteration)

Shobdon Neighbourhood Plan Changes to Draft Plan

following First Iteration of Regulation 14 Consultation, March 2016

Alteration Ref No	Draft Plan Section/reference	Proposed Change	Reason
1	Front page	Delete: Regulation 14 Public Consultation Draft February – March 2016 Retitle to read: SHOBDON Neighbourhood Development Plan 2011-2031 Submission Draft (Date)	To reflect next version of Plan
2	Regulation 14 Public Consultation Notice	Delete page 2	Served its purpose and is no longer required
3	Contents page	Revise in light of changes including deletions	To reflect changes to previous draft
4	Footer	Revise to read: Shobdon Neighbourhood Development Plan 2011-2031 - Submission Draft (date) 2016	Revise to indicate next stage of process for the document
5	Para 1.10	Add at end of para 1.10: The registered historic parkland above the village to the north, in particular, and also Shobdon Airfield below to the south significantly influences the village's character. The parkland extends down as far as	To emphasise the importance of Shobdon village's

both western and eastern entrances to the village along the B4362 and is important to its setting from those directions. Although some distance to the north of the village centre, the parkland's physical connection to that part of the original estate village is maintained through the area of open space on the north side of the road that extends between the village street and Shobdon Park. Shobdon Airfield sits some distance to the south overlooked by the village although pockets of its peripheral buildings having historic association with the Airfield are dispersed between them. Diagram 1 presents a broad definition of these characteristics.

particular character and setting that has influenced the approach to the Plan's proposals

6

Insert Figure 1:

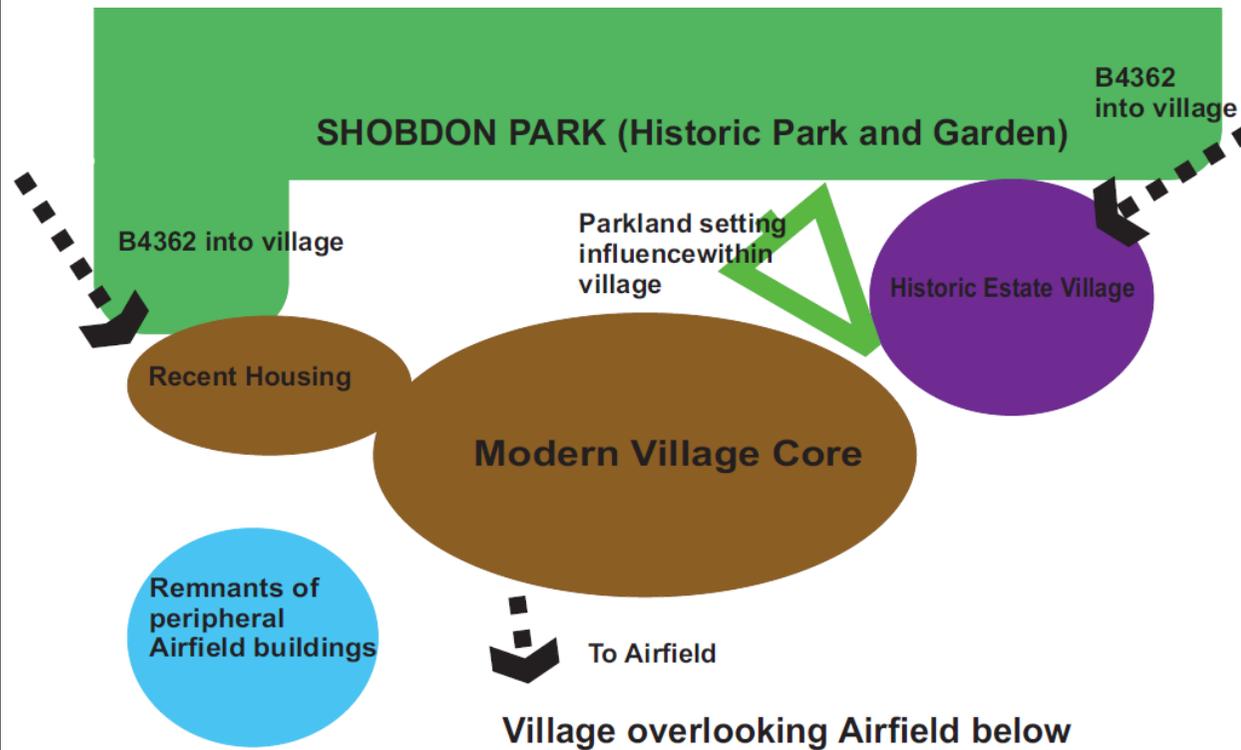


Diagram 1: Definition of the Broad Character of Shobdon Village Defining its Setting and Component Parts

To emphasise the importance of Shobdon village's particular character and setting that has influenced the approach to the Plan's proposals

7	Para 2.1	<p>Minor redrafting to the vision to read:</p> <p>‘That the Parish of Shobdon will continue as a sustainable, thriving and prosperous community, supporting a high quality of life for all its residents, with a balanced population and with a distinctive settlement at its core exhibiting vitality and dynamism.’</p> <p>‘This means that any new development must benefit the whole community and has to be accommodated in ways that meet changing circumstances, especially environmental, social and economic needs, while preserving the area’s of historic heritage, its natural environment and the local greenspace. The rate at which such development takes place must ensure that new residents can be absorbed into the community without overwhelming its values and character.’</p>	Minor changes to text
8	Para 2.2	<p>Redraft introduction and objectives to read:</p> <p>In developing this vision, the community was consulted to establish a number of the objectives which the Neighbourhood Plan should include. The following were agreed as a basis for assessing any proposals, and also forming the community’s development management policies:</p> <p>Objective one To address the following traffic issues in particular: (i) the speed of vehicles through the village; (ii) the effect of traffic noise on the community; (iii) the need for safer access by pedestrians and cyclists to local services and facilities, and (iv) to campaign for better road maintenance throughout the parish.</p> <p>Objective two To provide a range and choice of affordable new homes to meet the needs of all sections of the community, the new homes are spread appropriately in different parts of the parish, and all providing a pleasant environment. These homes will be built in small numbers with the density respecting and enhancing the character of the parish.</p>	Minor changes to text to improve understanding.

		<p>Objective three To maintain a thriving local economy by ensuring that employment and enterprise opportunities are available for local people. Appropriate business will be encouraged to the area by ensuring good Broadband reception, and adequate local services.</p> <p>Objective four To support improvements to the infrastructure, in particular to roads and pavements; the continuation of public transport; the upkeep of the sewerage system and surface water drainage; and the updating of Broadband and telecommunication systems. We shall encourage any changes to the infrastructure to be made avoiding the reliance on carbon as an energy source, and by seeking and using alternatives.</p> <p>Objective five To maintain and enhance the existing community, sports, recreational and social facilities, and to provide new facilities as required by an increasing population.</p> <p>Objective six To protect the natural and historic environment of the Parish, in particular its designated areas, sites and buildings and its landscape character, and to maintain access to these through the public footpath and bridle way network.</p>	
9	Para 2.3	<p>Redraft to read:</p> <p>‘Together with the above objectives, the work upon, and the content of, Shobdon Parish Plan, which included a resident’s questionnaire and was published in 2014, set the framework for and the content and approach to this Neighbourhood Development Plan.’</p>	To improve the text.
10	Policy S2	<p>Amend point ii) to read</p> <p>ii) Development in the hamlets of Ledicot, Easthampton and Uphampton and elsewhere within the Parish will provide for local housing needs in accordance with Herefordshire Core Strategy Policy RA3 covering residential development, in particular through the conversion of redundant rural building and limited infilling. Development of an appropriate scale that supports the local rural economy will be encouraged. Agriculture, including diversification, and small scale tourism activity will in particular be supported.</p>	To reduce potential duplication as suggested by Herefordshire Council

		Delete point iv)	
11	Section 3	<p>Add new paragraph 3.14 to read</p> <p>3.14 Herefordshire Local Plan Core Strategy contains a large number of detailed policies to control the principle and detail of development. It is not proposed to address all the issues dealt with in the Core Strategy within this plan or to duplicate them but to address those matters which have been identified as relevant to the local community. Shobdon Parish Council is happy to rely upon many Core Strategy policies. The policies that follow cover aspects of development that are of specific concern to the community. Although this plan should be read in conjunction with Herefordshire Local Plan Core Strategy, where it adds greater detail and clarity the neighbourhood plan policies carry greater weight. For example, the housing sites proposed in this plan indicate how Core Strategy Policy RA2 will apply to the settlement of Shobdon in respect of development within or adjacent to the village. There should be no further housing development beyond those sites indicated and plots falling within the settlement boundary unless rural development in line with Herefordshire Local Plan Core Strategy rural policies, including Policy RA3.</p>	To address a concern raised by Natural England that also applies more generally.
12	Policy S3	<p>Add new criterion 'b) active travel is encouraged and promoted with suitable infrastructure both within and around the development;</p> <p>Re- number subsequent criteria.</p>	To respond to representations by Herefordshire Council
13	Policy S4	<p>Amend Policy to read:</p> <p>New housing should meet the needs of the community in terms of size, type and tenure. In particular development upon sites within Shobdon should include a mix of properties including predominantly small and medium sized family homes and homes for the elderly. To meet these housing needs this Neighbourhood Plan provides for the construction of further new homes through infilling of individual and small plots within the settlement boundary defined upon Shobdon Inset Map and on the following sites:</p> <p>i) Land to north of Moor Meadow; ii) Land to South of Bar Meadow; iii) Land at north-west end of The Grove;</p>	To increase clarity, and take into account representations by Herefordshire Council

		<p>iv) Land to rear of CALVI, Canterbury Road; v) Land west of the Paddocks.</p> <p>In all instances development should comply with the following criteria: (as existing but add)</p> <p>f) Where there is good reason to believe that contamination of land may exist on any site, including through agricultural processes, an assessment should be carried out to establish the extent and nature of the contamination, and effective measures taken to ensure potential occupiers, and the wider environment, are not put at unacceptable risk;</p> <p>Renumber previous criterion f) to g)</p>	
14	Para 5.6	Change the figure '30' in the second sentence to '40'.	To reflect additional housing site being proposed.
15	Para 5.6	<p>Amend third sentence to read:</p> <p>These represent relatively small sites but should nevertheless present opportunities through sites shown in Table 2 below which shows how Herefordshire Local Plan Core Strategy housing target will be met.</p> <p>Delete:</p> <p>'These sites include: i) Land to north of Moor Meadow; ii) Land to South of Bar Meadow; iii) Land to east of Shobdon Primary school; iv) Land at north-west end of The Grove; v) Land to rear of CALVI, Canterbury Road.'</p> <p>Delete also 'in particular' from the 2nd sentence below the above.</p>	To take into account the above change and to add clarity. To show how the housing target will be met and exceeded. In addition to respond to representations by Herefordshire Council

Add Table 2 at the end of paragraph:

Table 2: Achieving the Housing Target 2011-2031

	Number of Dwellings
HC Core Strategy Requirement 2011 – 2031: 44 Dwellings	
1	Number of Completions 2011-2015 10
2	Dwellings with outstanding planning permissions 2015 8
3	Assessment of rural windfall allowance 2015-2031 12
4	Site Allocations* (40)
	i) Land to north of Moor Meadow; 12
	ii) Land to South of Bar Meadow; 10
	iv) Land at north-west end of The Grove; 4
	v) Land to rear of CALVI, Canterbury Road. 4
	vi) Land west of the Paddocks. 10
	TOTAL 2011-2031 70
	(2015-2031) (52)

* The estimate of dwellings for each site is for the purposes of showing how Herefordshire Local Core Strategy target for the Parish will be met. It is based upon the lower end of a medium density. It is

		possible that the number of dwellings may be higher on some sites than indicated, depending upon the type of dwellings provided.	
16	Policy S5	<p>Amend policy and title to read:</p> <p>Policy S5: Monitoring and Development Phasing</p> <p>There will be a general presumption that housing sites proposed in Policy S4 shall come forward within Shobdon village over the whole plan period which would effectively result in a rate of around 15 dwellings in every five-year period between 2016 and 2031. This equates to one of the larger and one of the smaller allocated sites for each period. Variation from this phasing at a higher rate may take place should evidence be available from a housing survey identifying both need and assessment of market forces combined with evidence that educational and sewerage facilities are able to cope. Similarly, should a proposal seek to meet a particular housing need identified in this plan then proposals that would result in a higher development rate may also be supported. Shobdon Parish Council will offer advice to Herefordshire Council on the suitability of adjustments to the identified building rate.</p>	To amend the policy to address concerns expressed by Herefordshire Council and others while retaining the approach which is considered necessary and appropriate given constraints and the need for community cohesion.
17	Paragraph 5.8	Add in last sentence 'monitoring of' before 'phasing of residential development	To indicate that monitoring of development rates is important given service constraints
18	Paragraph 5.9	<p>Revise to read:</p> <p>'The growth target of 12% within the parish over the 20-year plan period equates to just over 2 dwellings per year. Housing development outside of Shobdon village will come forward as the need arises. Within the village the level of development proposed through land allocations would represent a</p>	To indicate the approach to monitoring of development rates is

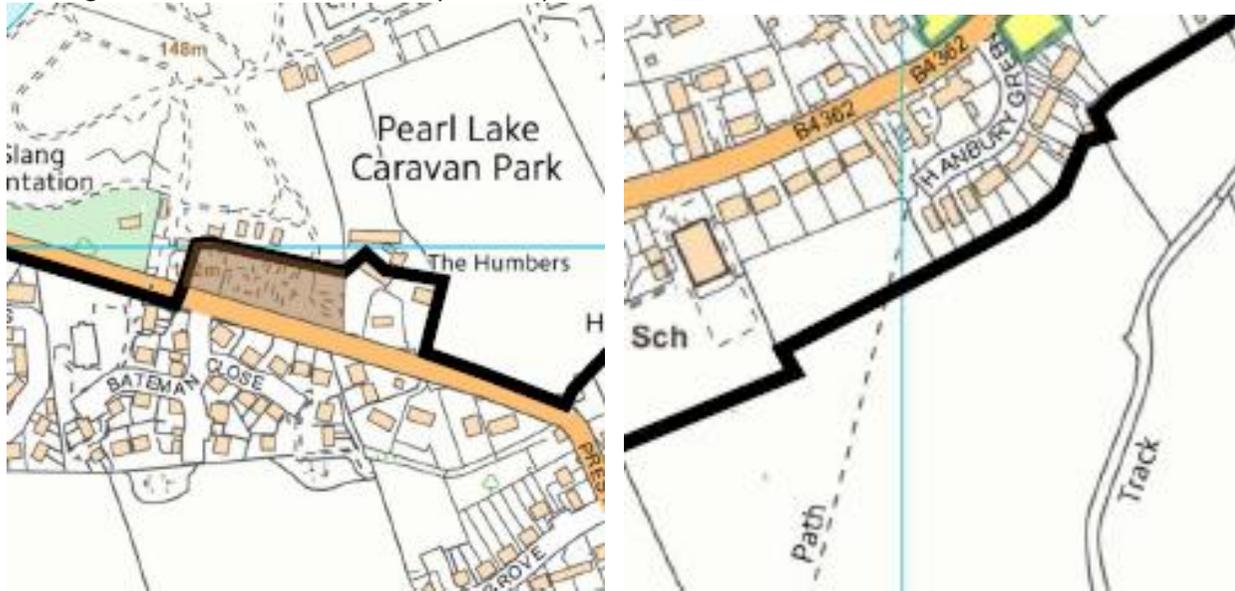
		rate of around 3 dwellings per annum over the remaining plan period. In monitoring development rates so that services are not stretched it is recognised that sites cannot be restricted to an annual rate and phasing over 5-year tranches of the plan period offers a reasonable approach to ensuring new development is accommodated satisfactorily. This will ensure radical change is not foisted upon the community, gradual and organic change occurs over the plan period and the character of the village is retained. Given the 20-year horizon for this plan to meet the needs of Herefordshire Core Strategy, housing needs should be accommodated over time and from time-to-time and not principally at the beginning of the plan period. This would also support Herefordshire Local Plan Core Strategy's approach to sustainable development by supporting growth within Hereford city and the market towns which are the most sustainable locations.'	important given service constraints
19	Paragraph 5.10	Revise to read: 'Flexibility to the proposed development rate is available where evidence is advanced that the potential constraints have been addressed and a need is identified. There is reference to the need reflecting market conditions. This should show that there is insufficient provision within the Kington Housing Market Area to meet assessed demand as expressed by Herefordshire Local Housing Market Assessment 2012 Update (or any successor document). In addition, proposals that would meet specific needs such that they may be brought forward at a higher development rate would include family starter homes and family homes or homes for the elderly, principally comprising 2 and 3 bedrooms. Shobdon Parish Council will monitor permissions granted. The phasing rates will apply to dwellings covered by Neighbourhood Plan Policy S4 and not apply to housing permitted under Core Strategy Policies RA3 or H2 Rural Exception Sites.'	To indicate the flexible approach to restricting development rates.
20	Policy S7	Add additional criterion 'Where appropriate an integrated landscape scheme shall form part of the site's design which in particular, contributes towards mitigating the effects of climate change; incorporates an appropriate range of biodiversity measures; and links with the wider landscape to enhance green corridors and stepping stones.' Renumber criteria where necessary	To correct an omission identified by Natural England.

21	Paragraph 7.2	<p>Revise to read:</p> <p>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 proceed. Developer contributions towards appropriate measures should be used to address this issue. In addition, areas within the village are known to have difficulty in coping with storm water as a consequence of poor porosity within the clay soil.</p>	To clarify the concerns about the sewerage system
22	Policy S10	<p>Redraft Policy to read:</p> <p>Development should not cause or increase surface water flooding or risk of pollution. Where this is identified as a potential problem, developers will need to undertake detailed assessments to inform the design of their planning applications and the inclusion of measures to overcome any constraint.</p> <p>Where the management of surface water drainage needs to be addressed developers should utilise sustainable drainage systems (SUDs), where this is practicable, including measures to support biodiversity.</p> <p>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.</p> <p>Development that does not connect to a public sewer should ensure there is no risk of pollution to any watercourse. Where this is identified as a potential problem, developers will need to undertake detailed assessments to show the measures proposed for effluent treatment are sufficient to fully address the issue.</p>	To meet the concerns of Natural England and Dwr Cymru Welsh Water.

23	Paragraph 7.3	<p>Reverse the paragraphs so that the text in para 7.4 is first followed by the text in para 7.3.</p> <p>Revise para 7.4 (now para 7.3) by inserting at the beginning of the paragraph:</p> <p><u>'7.3 Although there are no waterways within the Parish other than small brooks, there are a number of pools. No areas are proposed for development that fall within Flood Risk Zones 2 or 3. Nevertheless the issue of flood risk cannot be discounted although the Parish Council is happy to rely upon the provisions of Herefordshire Local Plan Core Strategy Policy SD3 when determining the approach that needs to be adopted towards the 'sequential' and 'exception' tests where appropriate. Recent estate development has, however, encountered flooding difficulties</u>'</p>	<p>Although no comments have been received from the Environment Agency elsewhere suggests they may not respond at Reg 14 but do so at Reg 16 requesting reference to the sequential and exception tests relating to flood risk.</p>
24	Paragraph 7.4	<p>Delete final three sentences in para 7.3 (now para 7.4) and add</p> <p>'Investment is therefore needed to address the lack of capacity within the public sewer and 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). Similarly, should there be the likelihood of exceedance in the capacity of the Sewage Treatment Works then similar provisions will apply. As a consequence, there is a need for a cautious approach the accommodating development in order that monitoring can be undertaken as part of the approach to delivering the Nutrient Management Plan.'</p>	<p>To meet the concerns of Dwr Cymru Welsh Water.</p>

25		<p>Add new paragraph after 7.4 to read:</p> <p>‘7.5 The plan area falls within the catchment for the River Wye Special Area of Conservation and the Pinsley Brook, which flows through the south of the parish, flows into the River Lugg. The Environment Agency has prepared a Nutrient Management Plan for the River Wye catchment, which includes the River Lugg. Herefordshire Local Plan Core Strategy Policy SD4 “Waste Water Treatment and River Water Quality” contributes towards the delivery of the Nutrient Management Plan. This Plan’s Policy S10 should be read in association with the Core Strategy policy in order to ensure development both within Shobdon village, Shobdon airfield and their surrounding countryside do not prejudice the aim of the Rivers Lugg and Wye achieving or maintaining the required levels of water quality to support their important ecological status.’</p> <p>Re-number subsequent paragraphs.</p>	To meet the concerns of Natural England.
26	Policy S11.	<p>Revise the policy including by reordering to read:</p> <p>Existing community facilities and services shall be retained and protected from development that might restrict unnecessarily their current use unless alternative provision is made in accordance with this policy.</p> <p>Proposals to enhance existing or provide new or additional community facilities within the parish will be supported where:</p> <p>a) They meet a need identified by the community concerned or by a body with statutory responsibility for a particular service;</p> <p>b) They do not create unacceptable noise, fumes, smell or other disturbance to neighbouring residential properties;</p> <p>c) They do not cause traffic congestion, adverse traffic impact upon local amenity or adverse impact on traffic flow on local roads;</p> <p>d) Access and off-street parking can be satisfactorily provided without harming existing residential and other uses.</p> <p>‘e) They include measures that encourage and promote active travel to and from the facility.’</p>	To add clarity and address the concerns of Herefordshire Council

		Contributions should be made towards the provision and maintenance of appropriate community facilities to meet the needs of community in order to address the demands that development places on the area. New development in Shobdon should contribute towards delivering these community facilities through Section 106 Agreements or the Community Infrastructure Levy provisions as the case may be.	
27	Policy S13	Rename title of Policy to read: Policy S13: Protection <u>of Local Green Space</u> and Provision of Open Space Revised first [part of policy to read Land identified as Local Green Space upon Shobdon Inset Map shall be retained <u>for the purposes indicated para 7.12.</u>	To clarify the content of the policy as suggested by Herefordshire Council. To clarify the importance of the areas concerned.
28	Para 7.12 (new number - previously para 7.11)	Amend final sentence and add a further sentence: The latter in particular has been an area protected because of its contribution to the character and setting of the village and the role it plays in maintaining the link between the historic part of the village and Shobdon Park Registered Historic Park and Garden. The single currently vacant property within this area might be replaced upon its footprint and within the extent of its curtilage by a new sympathetically designed dwelling where this would maintain the integrity of the green space. With regard to the play space at Bateman Close, housing development at The Grove should ensure that a link from that estate is afforded through to this play area.	To clarify the purpose of this area of green space and advise upon the future of the one property that sits within it.
29	Policy S15 ii)	Revise to read: 'ii) Ensuring development does not adversely affect important buildings, archaeological sites and other heritage assets within the village and surrounding countryside, including their settings, and with particular regard to Shobdon Arches and Shobdon Church;	To frame the policy in a positive way as requested by Herefordshire Council and ensure archaeological

			sites are included.
30	Policy S15 iii)	Add to criterion 'historic farmsteads'	For consistency Historic England general advice
31	Map	<p>Add site adjacent to the Paddocks and show within settlement boundary to include the adjacent properties on this side of the road also. Delete site adjacent to Hanbury Green as a housing allocation although retain settlement boundary at that point.</p>  <p>© Crown copyright and database rights [2015] Ordnance Survey 100054122 (Shobdon Parish Council (Licensee) Licence Number)</p>	<p>To respond to reasonable request for an additional site. To delete allocation because of uncertainty about ability to deliver.</p>

[Section 4](#)

Regulation 14 – (Second Iteration)

Shobdon Neighbourhood Development Plan

**Schedules of Representations in response to 2nd Regulation 14 Draft Plan,
July 2018**

Section 4.1

Schedule 1: Community/Developer Representations and Responses

Respondent Identification Number	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Representations/Suggested Changes Parish Council Consideration (In blue)	Proposed Change Number
C.1 Gladman Developments Ltd	Policy S1	Recommend change	<p>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.</p> <p>There is no reference to phasing in this policy.</p>	No change required
	Policy S2	Objection	<p>This 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).</p> <p>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.</p> <p>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.</p> <p>Herefordshire Local Plan Core Strategy paragraph promotes the use of settlement boundaries for the County's villages (para 4.8.23) and these have been used for the majority of settlements covered by adopted neighbourhood plans within Herefordshire. The NDP ensures the delivery of the required level of proportional growth required by the Core Strategy and hence a more flexible approach is not necessary. As indicated in the representation (16th paragraph), at such a time as there is a need to deliver more housing, there are a range of options available to ensure this can be met, including a review of the NDP if necessary. Again, there is no reference to phasing although there is to development coming forward at intervals where this is necessary to meet infrastructure constraints. This reflects, in particular, policy S9 which has been agreed with the local water company.</p>	No change required
	Policy S6	Objection	<p>Whilst Gladman recognise the importance of high quality design, planning policies should not be overly prescriptive and need flexibility in order for schemes to respond to sites specifics and the character of the local area. There will not be a 'one size fits all' solution in relation to design and sites should be considered on a site by site basis with consideration given to various design principles. Gladman therefore suggest that more flexibility is provided in the policy wording to ensure that a high quality and inclusive design is not compromised by aesthetic requirements</p>	No change required

Respondent Identification Number	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Representations/Suggested Changes Parish Council Consideration (In blue)	Proposed Change Number
			<p>alone. We consider that to do so could act to impact on the viability of proposed residential developments. We suggest that regard should be had to paragraph 60 of the NPPF which states that: "<i>Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles</i>".</p> <p>The design element of this policy reflects Government's concerns, set out in paragraph 56 of the NPPF that:</p> <p><i>'The Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.'</i></p> <p>The quote from paragraph 60 is selective and omits 'It is, however, proper to seek to promote or reinforce local distinctiveness.'</p> <p>The policy is not considered to be overly prescriptive and specifically indicates that innovative designs or features will not be resisted where they fit sensitively into the frontage concerned.</p>	
	Policy S12	Objection	<p>The designation of land as Local Green Space (LGS) is a significant policy designation and effectively means that once designated, they provide protection that is comparable to that of Green Belt land. As such, the Parish Council should ensure that the proposed designations are capable of meeting the requirements of national policy if they consider it necessary to seek LGS designation (paragraph 77).</p> <p>Whilst Gladman acknowledge that some evidence is contained within supporting text to the policy, we do not consider it robust enough to justify the designation of all of the identified sites as Local Green Space. We suggest that the Parish Council revisit this policy and ensure that sufficient evidence is provided to demonstrate consistency with the requirements of the Framework.</p> <p>The policy has been revisited in the light of advice from the Examiner appointed to consider the NDP at a previous stage, has taken on board the advice received and revised the policy accordingly. It is considered the areas designated at LGS meet the requirements of NPPF para 77.</p>	No change required
	Policy S13	Objection	<p>Paragraph 113 of the Framework refers to the need for criteria-based policies in relation to proposals affecting protected wildlife or biodiversity sites or landscape areas, and that protection should be commensurate with their status which gives appropriate weight to their importance and contributions to wider networks. The policy fails to make a distinction and recognise that there are two separate balancing exercises which need to be undertaken for national and local designated sites and their settings. We therefore suggest that the policy is revisited to ensure that it is consistent with the approach set out within the Framework.</p> <p>Herefordshire Local Plan Core Strategy policies LD1 and LD2 have been confirmed as meeting the requirements of the NPPF and it is clearly stated in paragraph 8.3 that NDP policy S13 is not intended to replace those but to identify the local natural features and areas which contribute to the character and local distinctiveness of the parish and Shobdon village. The complementary nature of the NDP policy identifies areas to minimise the effects</p>	No change required

Respondent Identification Number	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Representations/Suggested Changes Parish Council Consideration (In blue)	Proposed Change Number
			on biodiversity and provide net gains in accordance with NPPF para 109. It also seeks to address the positive aspects of landscape and biodiversity planning set out in NPPF para 114.	
	Policy S14	Objection	<p>Paragraph 132 of the Framework makes it clear that great weight should be given to a heritage asset's conservation and that <i>'the more important the asset, the greater the weight should be'</i>. With reference to designated heritage assets, the Parish Council should refer specifically to paragraphs 133 and 134 of the Framework which sets out that Councils should assess the significance of the designated heritage asset and where there is less than substantial harm, this should be weighed in the planning balance against the public benefits of the proposal. Where there is deemed to be substantial harm, then the proposal would need to achieve substantial public benefits to outweigh that harm. For non-designated heritage assets, the policy must reflect the guidance set out within paragraph 135 of the Framework. This states that the policy test that should be applied in these cases is that a balanced judgement should be reached having regard to the scale of any harm and the significance of the heritage asset. Gladman believe that this policy needs to be redrafted in order to ensure that it conforms with the guidance and requirements set through national policy.</p> <p>This policy makes specific reference to assets within the Parish. Shobdon Parks mis a Historic England Registered Park and Garden; Shobdon Arches and Shobdon Church are nationally important heritage assets; Historic England has identified traditional farm buildings as important to the historic landscape of the County; the County has a rich archaeological that has yet to be fully explored. The policy sets out a positive strategy for addressing the conservation of the Parish's heritage covering the range of existing and potential assets in accordance with the primary provision for the historic environment set out in NPPF para 126.</p>	No change required
C.2 Heaton Planning on behalf of Tarmac Trading Ltd	Mineral matters	Objection	<p>Previously commented on a number of points within the Submission Draft Neighbourhood Development Plan and within the Neighbourhood Development Plan as re-submitted to Herefordshire Council on 19th July 2017. Although the condition statement prepared in response to that consultation indicates that mineral issues are not appropriate to a neighbourhood plan, Paragraph: 005, Reference ID: 27-005-20140306 of the Planning Practice Guidance indicates the importance of the role of District Councils in safeguarding minerals. Whilst Herefordshire is a Unitary Authority and responsible for the mineral planning function, the above paragraph of the Planning Practice Guidance refers to the need to consider mineral plans when identifying areas for non-mineral development within Plans. If the Shobdon Neighbourhood Plan proceeds to formal adoption, the policies contained within it, including potential allocations, will become material planning considerations. Therefore, we would advocate that there is a role and a responsibility to have regard to mineral reserves when preparing Planning Policy documents.</p> <p>Neighbourhood plans cannot include policies that cover minerals development. The policies in the NDP must accord with those in the Local Plan Core Strategy and the policies within the latter also promote development without reference to minerals. This is because the Development Plan that forms the basis for decisions on planning applications includes policies in the Minerals of Waste Local Plan (or in this instance the 'saved' policies from Herefordshire UBD covering minerals). However, the Parish Council is aware that where neighbourhood plans contains an existing or planned minerals site or safeguarded mineral deposits they should make sure that any proposed new development takes place in a way that does not negatively affect mineral resources or</p>	No change required

Respondent Identification Number	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Representations/Suggested Changes Parish Council Consideration (In blue)	Proposed Change Number
			<p>minerals operations. The main tool used to help safeguard minerals and waste sites are 'Minerals Safeguarding Areas'. Although Herefordshire Council has yet to prepare its minerals plan it operates with a 'Saved' UDP policy that refers to 'Safeguarding Mineral Reserves'. (see file:///C:/Users/User/Downloads/appendix_1_list_of_saved_and_replaced_policies.pdf) These are shown on its current 'Policies Map'. No such areas fall within Shobdon Parish. There is such an area to the south although this does not adjoin the Parish and it is some distance away from its border. The NDP does not allocate development close to this area. Herefordshire Council's Minerals and Waste Officer/Team has not responded to the draft plan consultation or advised that there are any operations or future development planned for the NDP area or that might be affected by any of the NDP policies.</p>	
	NDP Objectives	Comment	<p>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 Development Plan for Herefordshire and the National Planning Policy Framework (NPPF). Employment development and sustainable growth within the Parish will have a significant demand on local mineral reserves and the importance of maintaining local mineral supply should be safeguarded.</p> <p>Noted</p>	No change required
	Policy S1	Objection	<p>Policy 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 is unclear within the Draft Plan whether Airfield development is proposed to the north - adjacent to existing employment uses - or in proximity to Tarmac's interests to the south. The Plan should identify land or provide assurances that proposed development will not prejudice potential future mineral working by reason of direct sterilisation of workable mineral resource as well as proximal sterilisation -siting non-compatible development in proximity to one another. The Neighbourhood Development Plan should include at Policy S1 wording to ensure that non-mineral 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 but also saved policy M5 of the Herefordshire UDP. In addition to the Planning practice guidance which advocates consideration of known mineral resource when allocating sites for new development. Furthermore, 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 Assessment work which would assess the level of any potential adverse impact and provide mitigation measures if required.</p> <p>There is no evidence to show that there are mineral deposits within the south of the Parish on the airfield. There are already buildings in employment use on this southern edge in the location closest to the 'Safeguarding Mineral Reserves' area that sits outside of the Parish in the Parish of Eardisland. Its location can be seen on SEA Map 2 at file:///C:/Users/User/Downloads/Eardisland_SEA_Scoping_Report_v2.pdf . This clearly shows that it is already separated from Shobdon Parish by buildings and also by an area at risk of flooding. The Environment</p>	No change required

Respondent Identification Number	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Representations/Suggested Changes Parish Council Consideration (In blue)	Proposed Change Number
			<p>Agency has asked for reference to be made to this. It should also be noted that Herefordshire Council has designated a Special Wildlife Site on the southern edge of the Parish - see file:///C:/Users/User/Downloads/Shobdon_SEA_Scoping_Report_October_2014.pdf (SEA Map 2). An NDP cannot include a policy that might cover land or development within an adjacent Parish/NDP area. Saved Minerals Policy M5 safeguards mineral reserves that might be otherwise sterilised by development. (see file:///C:/Users/User/Downloads/appendix_1_list_of_saved_and_replaced_policies.pdf). The requirements for Environmental Assessments are covered by legislation that a NDP cannot change. Requirements in relation to mineral development cannot be included in a NDP.</p>	
	Policy S2	Objection	<p>This policy should recognise and consider the potential impact on possible future mineral operations, as with Policy S1 above.</p> <p>See response to representation of Policy S1 above</p>	No change required
	Policy S7	Objection	<p>The presence of Shobdon Quarry should be given recognition within the emerging NDP, an example of where the quarry's presence has been omitted is the preamble to Policy S7 whereby it is stated that "agricultural activities surround the airfield". The omission the quarry site adjacent to the Airfield fails to recognise its presence is seemingly at odds with the purpose of Policy S7 'Supporting Local Business'. The Policy 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 S7 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 individual merits and this includes balancing a need for development against any potential adverse impact and mitigation as required. Point six of Policy S7 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 S7 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'. As we understand from the Addendum to the Consultation Statement (July 2017), reference to pollution control has been requested by Herefordshire Council. We support the inclusion of reference to pollution control, but request the Policy is re-worded as above.</p> <p>There are a number of former/historic small quarries referred to as Shobdon Quarry within Herefordshire Council's Historic Environmental Record and it is uncertain to which quarry the representation refers to. In relation to all 'Shobdon Quarry Sites' that fall within the Parish (none of which fall within safeguarded areas)</p>	See Change No 8

Respondent Identification Number	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Representations/Suggested Changes Parish Council Consideration (In blue)	Proposed Change Number
			<p>saved Policy M5 would be a material consideration until Herefordshire Council produces its Minerals and Waste Local Plan/DPD. There are no references to protecting mineral sites within any Herefordshire Local Plan Core Strategy policies and the NDP takes the same approach. The response to Policy S1 representation is again referred to in relation to protecting mineral sites.</p> <p>Amendments are proposed aimed at meeting the requirements for policies to be expressed positively although there remain significant local concerns about both traffic and effects on the environment resulting from some forms of potential industrial development upon the airfield and more generally within the Parish.</p>	
	Paragraph 6.5	Objection	<p>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.</p> <p>The paragraph refers to noise and traffic in terms of effect on amenity, although it should be clarified that it relates to adverse effects.</p>	See Change No 9
	Policy S13	Objection	<p>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. The Addendum to the Consultation Statement (July 2017) states that items (f) and (g) of the Policy are "features that are important at the local level in a neighbourhood plan". Whilst they may be of local importance, the wording of neighbourhood planning policy is a consideration in the determination of planning applications, and must be in accordance with the overarching national policy/guidance, and the wider Herefordshire Development Plan. 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' in order to bring the Policy in accordance with the NPPF. Similarly, item (e) requires "any proposal" to include "measures to enhance the nature conservation value of areas around Shobdon Village and Shobdon Airfield". This requirement is overly onerous on developers and is not consistent with paragraph 118 of the NPPF.</p> <p>It is understood that this representation suggests there may be instances where enhancements to biodiversity may not be possible or overly onerous and that 'where appropriate' should be included. Herefordshire Local Plan Core Strategy policy LD2, which has been found to be 'sound', does not include such a requirement but, in relation to enhancements, indicates:</p> <p><i>'Development proposals should conserve, restore and enhance the biodiversity and geodiversity assets of Herefordshire, through the:</i></p> <ol style="list-style-type: none"> <i>2. restoration and enhancement of existing biodiversity and geodiversity features on site and connectivity to wider ecological networks; and</i> <i>3. creation of new biodiversity features and wildlife habitats.'</i> 	No change required

Respondent Identification Number	Section/ Policy Number	Support/ Object/ Comment/Recommend change/etc.	Representations/Suggested Changes Parish Council Consideration (In blue)	Proposed Change Number
			The NDP policy reflects these provisions, indicating those important to the Parish.	

Schedule 4.2:

Shobdon Neighbourhood Development Plan

Schedule2: Changes to the 2nd Regulation 14 draft plan.

(NB small changes resulting from typographical, similar errors and small consequent changes such as page and paragraph numbering are not shown)

July 2018

Shobdon Neighbourhood Development Plan Changes to Draft Plan Following Regulation 14

Change Ref No	Draft Plan Section/reference	Proposed Change	Reason
1	Plan Title page	Amend to read ' SHOBDON PARISH_Neighbourhood Development Plan 2011 - 2031 Submission Draft – (Date) 2018'	To reflect the next stage in the plan making process
2	Footer	Amend to read: ' <u>Shobdon Parish Neighbourhood Development Plan 2011 - 2031 Submission Draft – (Date) 2018'</u>	To reflect the updated version
3	Regulation 14 Notice	Delete notice	The notice is no longer required as that formal stage has passed.
4	Figure 1	Amend plan to show the next stage in the NDP making process	To show the next formal stage that the plan has reached.
5	Policy S4	<p>Amend Policy to read:</p> <p>Policy S4: Meeting Housing Needs within Shobdon Village</p> <p>New housing should meet the needs of the community in terms of size, type and tenure. Development upon housing sites within Shobdon should include a mix of properties including predominantly small and medium sized family homes and homes for the elderly. To meet these housing needs this Neighbourhood Plan provides for the construction of further new homes through infilling of individual and small plots within the settlement boundary defined upon Shobdon Inset Map and on the following sites:</p> <ul style="list-style-type: none"> i) Land east of The Humbers and The Paddocks; ii) Part field to the South of Bar Meadow iii) Land west of the Paddocks. <p>In all instances, development should comply with the following criteria:</p>	To include advice from Herefordshire Council about development potentially being affected by existing adjacent uses and to seek provision for pedestrians and cyclists on all sites.

		<ul style="list-style-type: none"> a) Dwellings should be in scale with the general density and massing of existing properties in the vicinity <u>and should be designed sympathetically to respect their character and features;</u> b) Development should not adversely affect the amenity of adjacent properties <u>nor should the amenity of new residents be adversely affected by existing industrial, agricultural or commercial activity;</u> c) Development should not result in a form of ‘garden grabbing’ through cramming development unreasonably within existing properties; d) Parking arrangements should be provided in accordance with Herefordshire Council’s standards and should not detract from the village street scene but be an integral part of the overall design. e) Development should not lead to increased storm water flooding, and works should be undertaken to ensure that such flooding does not occur; f) Where there is good reason to believe that contamination of land may exist on any site, including through agricultural processes, an assessment should be carried out to establish the extent and nature of the contamination, and effective measures taken to ensure potential occupiers, and the wider environment, are not put at unacceptable risk; g) Development should make provision for pedestrians and cyclist, <u>especially on site ii) which should provide a link through from the access road and footpath serving the Grove to connect through to the road at Bar Meadow.</u> 	
6	Paragraph 5.8	Add at end of paragraph: <u>‘All sites have the potential to link into the existing network through crossing points or even pavements and proposals should include such provision where practically possible.’</u>	On the advice of Herefordshire Council, reflecting the second of the above changes.
7	Policy S6	Amend criterion g) to read: g) Assisting offsite measures such as supporting infrastructure to promote <u>active</u> travel and enabling a sustainable drainage system to serve a wider range of properties where appropriate;	On the advice of Herefordshire Council
8	Policy S7	Revise policy to read: Policy S7: Supporting Local Business	To respond positively to

		<p>The enhancement of existing employment land in and around Shobdon Airfield will be encouraged. Proposals that will improve the amenity of existing sites and premises, in particular along or close to Canterbury Road, will be welcome as will redevelopment with an element of live-work units. Redevelopment proposals will be supported <u>where they do not</u> result in unacceptable levels of traffic passing through Shobdon village or have other <u>significant adverse</u> effects upon the environment.</p> <p>Proposals for the development of local businesses elsewhere will be supported where they result in sustainable economic growth.</p> <p>The following criteria are considered crucial in determining whether such development is considered sustainable growth of businesses, including upon Shobdon Airfield and throughout the Parish:</p> <ul style="list-style-type: none"> a) Development proposals should be in scale with the rural character of the group parish; b) The amenity of nearby residents is not adversely affected; c) There will be no <u>significant</u> detrimental effect upon the local highway network as a consequence of traffic generated by the proposal; d) There will be an emphasis upon the use and conversion of rural buildings to employment uses; e) Proposals for change of use of land should not result in the loss of high quality agricultural land but utilise brownfield sites; f) Proposals should avoid obtrusive external storage and paraphernalia but provide effective screening where this is necessary; g) Potential polluting effects of any enterprise should be fully mitigated,; h) Diversification proposals meeting the above criteria will in particular be supported where this retains essential services and facilities through increasing their viability. i) Tourism enterprises will be supported where they are appropriate to the area's rural character in terms of the nature and scale; 	<p>representations indicating that the policy was previously negatively worded and the need to qualify adverse effects</p>
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		Proposals for change of use of existing business premises away from employment activity will need to demonstrate that the existing use is no longer economically viable.	
9	Paragraph 6.5	Amend to read: ‘The continued use of premises within the Airfield, including expansion and enabling economic growth is supported but it needs to reflect the scale of the area, should not <u>adversely</u> affect local amenity such as through increased noise or excessively high levels of traffic. The conditions indicated are considered important and continue the planning policy approach set out in previous plans which have in the past specifically referred to the Airfield. They should also apply more widely within the Parish to rural enterprises that might be accommodated. This would include any proposal to expand Pearl Lake Caravan Park although specific regard would need to be given to the area’s rural character and Policy S13 relating to the natural environment. <u>Parts of Shobdon Airfield fall within flood risk zones 2 and 3, and regard should be had to policy S9 and Herefordshire Local Plan Core Strategy Policy SD3 (see paragraph 7.3) where these are relevant.</u> ’	To respond positively to the need to qualify adverse effects and make reference to the fact that parts of Shobdon Airfield fall with areas at risk of flooding as suggested by the Environment Agency
10	Policy S9	Amend the third paragraph in the Policy to read: Development that may result in the capacity of the Sewage Treatment Works or public <u>sewerage network</u> 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.	To correct the description as requested by Welsh Water
11	Paragraph 7.7	Add at the beginning of the paragraph: <u>‘Existing facilities and services that would be protected or enhanced through this policy include: Shobdon Primary School together with its community rooms, the Bateman Arms Public House and small incidental amenity space specifically designed to serve housing developments. Larger amenity and play areas serving the wider purposes are covered within policy S12.’</u>	In response to Herefordshire Council’s advice to list existing services and facilities in the village.
12	Policy S12	Amend the second paragraph to read: ‘The following areas are identified as open space to be retained principally for their purposes of amenity, <u>recreation</u> and play areas, although may be laid out to improve their utility for such purposes or to improve access to both the areas themselves or to serve the wider community.	To respond positively to the representation by Sports England

		<p>The loss of such areas to alternative uses must comply with Herefordshire Local Plan Core Strategy policy OS3:</p> <p>i) The play area between Bateman Close and The Birches; ii) The play area at The Grove. iii) <u>Shobdon Primary School Playing Field</u></p> <p>In relation to ii), the provision of a foot</p>	
13	Paragraph 7.12	<p>Amend first sentence to read:</p> <p>‘The <u>three</u> areas defined as open space are facilities, including for children’s play, provided to serve the housing estates within which they sit <u>or as playing fields for the school.</u>’</p>	To respond positively to the representation by Sports England
14	Policy S14	<p><u>In criterion d) delete ‘in accordance with paragraph 135 of the National Planning Policy Framework’ in criterion’</u></p>	This is unnecessary and paragraph reference may be superseded in the revised NPPF.
15	Shobdon Village Policies Map	Delete	This will be replaced by a free-standing map prepared by Herefordshire Council within its house style to form part of the Local Plan Policies Map