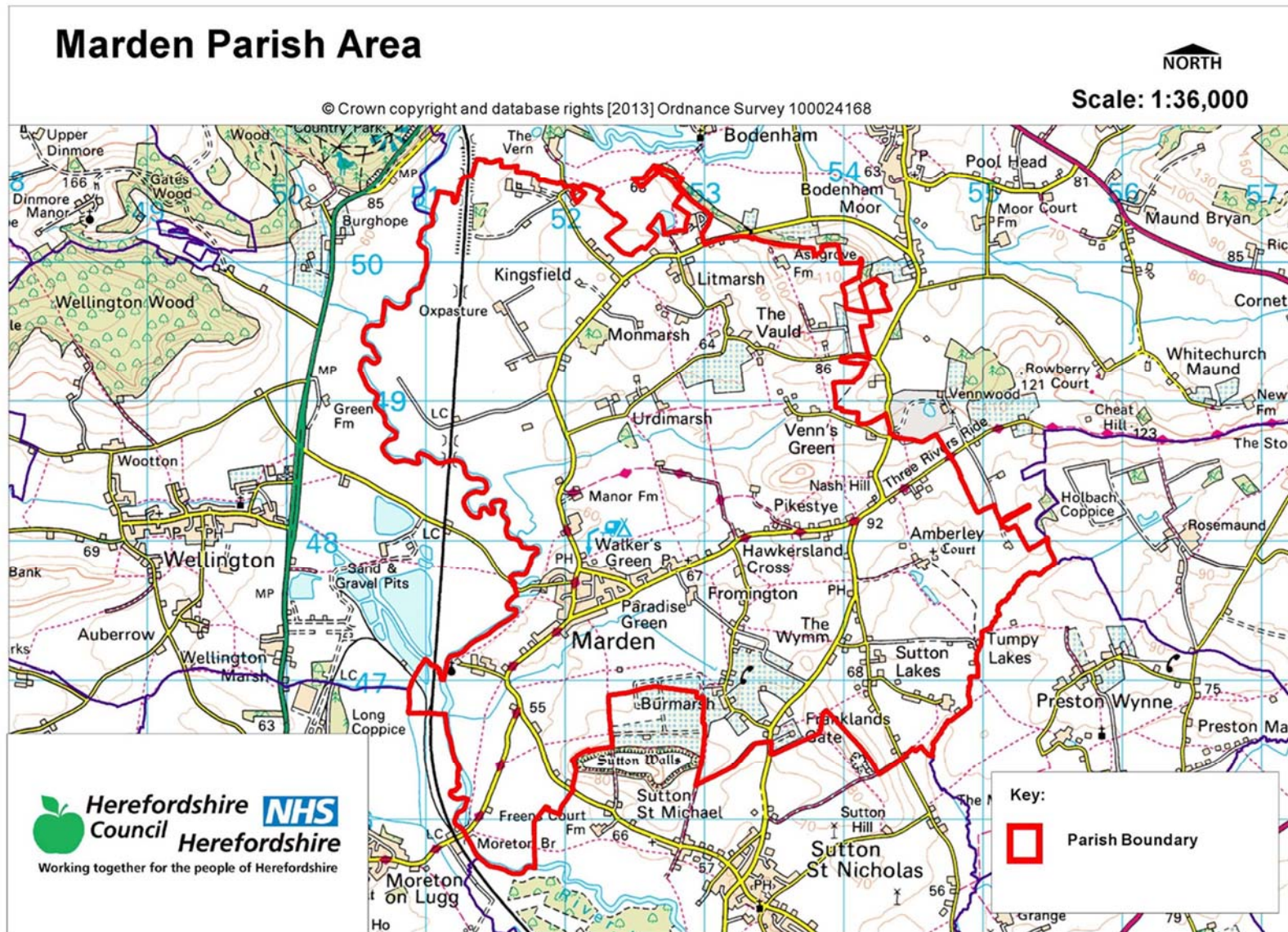


**Marden Submission Neighbourhood Development Plan
Consultation Statement
November 2015**



Map 1 Marden Designated Neighbourhood Area (PSMA Licence no. 100054426)



1.0 Introduction and 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)¹ 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 Marden Neighbourhood Development Plan has been prepared in response to the Localism Act 2011, which gives parish councils and other relevant bodies, new powers to prepare statutory Neighbourhood Plans to help guide development in their local areas. These powers give local people the opportunity to shape new development, as planning applications are determined in accordance with national planning policy and the local development plan, and neighbourhood plans form part of this Framework. Other new powers include Community Right to Build Orders whereby local communities have the ability to grant planning permission for new buildings.
- 1.3 In September 2013, the Parish Council made the decision to prepare a Neighbourhood Development Plan for the Parish. The area was formally designated by Herefordshire Council in October 2013 and is shown in Map 1 above. In August 2014 the Parish was successful in securing funding of £6,999 from Government Agency Locality to support the preparation of the Neighbourhood Development Plan.

¹ <http://www.legislation.gov.uk/uksi/2012/637/contents/made>

2.0 Draft Neighbourhood Development Plan and Informal Public Consultation

- 2.1 Planning consultants Kirkwells were appointed in July 2014 by the Parish Council to provide ongoing professional town planning support and advice. The Draft Neighbourhood Plan was prepared by a Steering Group of Parish Councillors and local residents.

Locally Identified Issues

- 2.2 An initial scoping questionnaire was undertaken by the Steering Group in March 2014 to identify the areas which the community considered should be brought forward into the Marden Neighbourhood Development Plan. However, although the questionnaire went to every household in the parish, the response rate was 8%. The results indicated the importance to residents of housing development and environmental issues. The questionnaire and analysis is shown in Appendix I.
- 2.3 A second questionnaire was undertaken in September 2014, relating to possible modification of the Settlement Boundary. The consensus was that the existing Settlement Boundary should be retained. The response rate was 7.5%. The questionnaire and analysis of the questionnaire is shown at Appendix II. Following this consultation, it was noted that the Settlement Boundary could not be kept in the form shown in the consultation. In addition it was noted that there were many areas within or adjacent to the Settlement Boundary that could be developed and therefore a decision was made to undertake a 'Call for Sites', which occurred in November 2014.
- 2.4 During this, the Steering Group carried out further consultation with the community on the level of growth in Marden over the plan period. Consultation forms were sent to all properties within the Parish, as an article within News & Views (the Parish Magazine). 61 individual forms were received, returned to a box in the village shop or by email to the Clerk. However some properties returned more than one form. As there are 1090 adults on the 2014 electoral register, the response rate was low. The consultation form and specific comments from residents are included at Appendix III.
- 2.5 The 'Call for Sites' brought forward 21 possible sites from land owners and other interested parties (see Appendix IV). All these sites were then independently and objectively assessed and scored against agreed criteria by Kirkwells, Planning Consultants, who provided the Steering Group with a comprehensive report and addendum (both available in full at www.mardenvillage.org.uk). 14 submitted sites were in open countryside or hamlets surrounding Marden and could not be allocated within this Neighbourhood Development Plan, at that time. They were subject to the National Planning Policy Framework 2011 that states housing should be located where it will enhance or maintain the vitality of rural communities, or they had to comply with Policy H2 for rural exception sites of Herefordshire Council's Core Strategy.

2.6 Of the 7 submitted sites within or adjacent to the Settlement Boundary, one site (Site 14) was assessed by Kirkwells as suitable for only 2 dwellings and therefore was too small to allocate. Site 12, the playing field next to the school had been identified as a protected green space (it has now been re-designated as a community facility) within the Plan and therefore the Steering Group considered this site as not suitable for development. The 5 remaining sites within or adjacent to the Settlement Boundary, as defined in the Herefordshire Unitary Development Plan, were ranked by Kirkwells as follows:

Site 11	Ranked 3
Site 13	Ranked 1
Site 15	Ranked 2
Site 16	Ranked 4
Site 17	Ranked 5.

2.7 The 5 sites considered by the Steering Group to be suitable for public consultation were then assessed by the Steering Group against the Vision and Objectives in the Plan. In order to collect views on the draft Plan and possible housing site allocations, an open consultation event was held on 10-11 January 2015. The flyer delivered to householders is included in Appendix V in addition to the report of the Open Event.

3.0 Formal Consultation on the Marden Draft Neighbourhood Development Plan – 5th February 2015 – 19th March 2015

- 3.1 The public consultation on the Marden Draft Neighbourhood Development Plan was carried out in accordance with The Neighbourhood Planning (General) Regulations 2012 (SI No. 637) Part 5 Pre-submission consultation and publicity, paragraph 14. This states that:

Before submitting a plan proposal to the local planning authority, a qualifying body must—

- (a) publicise, in a manner that is likely to bring it to the attention of people who live, work or carry on business in the neighbourhood area*
- (i) details of the proposals for a neighbourhood development plan;*
- (ii) details of where and when the proposals for a neighbourhood development plan may be inspected;*
- (iii) details of how to make representations; and*
- (iv) the date by which those representations must be received, being not less than 6 weeks from the date on which the draft proposal is first publicised;*
- (b) consult any consultation body referred to in paragraph 1 of Schedule 1 whose interests the qualifying body considers may be affected by the proposals for a neighbourhood development plan; and*
- (c) send a copy of the proposals for a neighbourhood development plan to the local planning authority.*

- 3.2 The Marden Draft Neighbourhood Development Plan was published for 6 weeks formal Public Consultation from 5th February 2015 – 19th March 2015. The Draft Scoping Report for Strategic Environmental Assessment (SEA) of the Neighbourhood Plan was also published for consultation with English Heritage, Natural England and the Environment Agency by Herefordshire Council when the Draft Plan was published.
- 3.3 The Draft Neighbourhood Plan and a copy of the Response Form were available for viewing and downloading from the Marden Neighbourhood Development Plan website <http://www.mardenvillage.co.uk/parish-council/marden-neighbourhood-development-plan/neighbourhood-development-plan-regulation-14-consultation-5-2-19-3-15/> with a link from Herefordshire Council's website <https://www.herefordshire.gov.uk/planning-and-building-control/neighbourhood-planning/submitted-draft-plans-and-adopted-neighbourhood-development-plans>. Consultation responses were invited using the accompanying Response Form to the Parish Clerk via an email to mardenclerk@gmail.com or by printing out and submitting to a postal address: 7 John Davies Place, Westcroft, Leominster, Herefordshire, HR6 8JD. Written responses were also invited using the advertised postal address.

- 3.4 An e-mail or letter was sent to all Consultation Bodies, including neighbouring Parish Councils and businesses in the parish, providing information about the consultation dates and the locations where the Draft Plan and accompanying documents could be viewed and downloaded. Information about the Regulation 14 Launch Event was published in the Parish Magazine which was delivered to every household in the Parish. Respondents were invited to complete the Response Form and to submit completed forms / other comments by email or by post to the Parish Clerk. The list of Consultation Bodies was kindly provided by Herefordshire Council.
- 3.6 The consultation process was also promoted in the following ways:
- A flyer was displayed prominently on 8 notice boards round the Parish
 - Copy in the Parish Magazine
 - On the welcome page of the parish website, as well as on the Neighbourhood Development Plan pages.
- 3.7 The Neighbourhood Development Plan website advised in the Draft that hard copies of all the documents were available on request from the Parish Clerk and the following locations for viewing:
- The Post Office
 - The Mini Market
 - St Mary's Church
 - The Community Centre
 - The Amberley Arms
 - Members of the Steering Group.
- 3.8 A copy of the Draft Neighbourhood Plan was submitted to Herefordshire Council.
- 3.9 The consultation letter, flyer, and list of consultation bodies are included at Appendix VI.

4.0 Summary of Consultation Responses to the Draft Neighbourhood Plan for the consultation 5th February 2015 – 19th March 2015

4.1 Table 1 below sets out the responses submitted to the Draft Neighbourhood Plan, together with information about how these responses have been considered by the Parish Council and have informed the amendments to the Submission Neighbourhood Plan.

**Table 1 - Marden Draft Neighbourhood Development Plan – Formal Consultation Responses.
Draft Neighbourhood Development Plan – Consultation Responses – 19 March 2015**

Consultee Name Address Ref. No.	Page No.	Para. No.	Policy No.	Support / Object / Comment	Comments received	Parish Council Comments	Amendments to NP
M14/1 Dr MCF Smith, 7 Brook Orchard, Marden		8.39	M12	Object/ Comment	<p>My concern is the possible development site opposite Brook Farm, outside the current village margin.</p> <p>1) Flood water run-off (& chemical) – development will lead to faster run off & make Lugg area more prone to flooding, locally & downstream.</p> <p>2) Lugg SSSI (already only 20% favourable) will deteriorate. I recently moved ½ mile from Urdimash to Marden. Garden bird diversity notably less than outside. Similarly small mammal population considerably less & less diverse, even though I live on village edge, with green fields to one side, these are very evident. The River Lugg floods frequently & widely often obstructing roads & limiting access. The flood area is immediately adjacent to this site. Any increased rate of run-off will certainly</p>	Noted. Site not selected for Neighbourhood Development Plan. Planning application is to be decided by Herefordshire Council.	No change

Consultee Name Address Ref. No.	Page No.	Para. No.	Policy No.	Support / Object / Comment	Comments received	Parish Council Comments	Amendments to NP
					<p>aggravate flash flooding & risk damage to road bridges, culverts & danger to road users.</p> <p>There is no possibility on site of creating 'ponds/lagoons' of adequate size & above the current flood plain (re policy M12)</p> <p>3) Increased road traffic – already utilised by heavy lorries accessing Brook Farm industrial unit – narrow lane, on bend.</p>		
M14/2 RA Bust, The Coal Authority, 200 Lichfield Lane, Berry Hill, Mansfield, NG18 4RG				Comment	<p>Thank you for the notification of the 5 February 2015 consulting The Coal Authority on the above.</p> <p>The Coal Authority is a non-departmental public body which works to protect the public and the environment in coal mining areas. Our statutory role in the planning system is to provide advice about new development in the coalfield areas and also protect coal resources from unnecessary sterilisation by encouraging their extraction, where practical, prior to the permanent surface development commencing.</p> <p>As you will be aware the neighbourhood plan area is outside of the defined coalfield and therefore The Coal Authority has no specific comments to make on the Neighbourhood Plan.</p>	Noted.	No change

Consultee Name Address Ref. No.	Page No.	Para. No.	Policy No.	Support / Object / Comment	Comments received	Parish Council Comments	Amendments to NP
					In the spirit of ensuring efficiency of resources and proportionality it will not be necessary for you to provide The Coal Authority with any future drafts or updates to the emerging Neighbourhood Plan. This letter can be used as evidence for the legal and procedural consultation requirements. The Coal Authority wishes the plan team every success with the preparation of the Neighbourhood Plan.		
M14/3 Pete Boland, English Heritage, West Midlands Region			M11	Comment	Thank you for the invitation to comment on the above draft Neighbourhood Plan. Overall English Heritage considers the Plan to be a well-considered, concise and fit for purpose document. We are supportive of the content of the document and its' emphasis on the protection of outlying hamlets from overdevelopment, the conservation of the natural and built environment and the maintenance of the rural nature of the Parish. We particularly commend Policy M11 on Landscape Character and the way that it recognizes the range of natural and historic environment assets warranting protection in the countryside. We would suggest at the end of point V. of the policy that it would be entirely justified to reference the natural <i>and historic environments</i> in the context of Countryside Stewardship.	Noted. Agreed. Amend accordingly.	Amend Policy M11 Landscape character, bullet V now (e) to read: <i>Encouraging country stewardship and similar schemes to enhance the biodiversity and natural and historic environments.</i>

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					Beyond those observations we have no substantive comments to make on what English Heritage considers is a very good example of community led planning.		
M14/4 Rhys Evans, Welsh Water, Forward Planning, PO Box 3146, Cardiff, CF30 0EH			M12	Support	Given that the Marden Neighbourhood Development Plan has been prepared in accordance with the emerging Herefordshire Local Plan Core Strategy, DCWW are supportive of the vision, objectives and policies set out. Specifically with regard to Policy M12: Surface Water Run-off, new development can negatively affect the natural surface water run-off and ground permeability. As such, we support the integration of Sustainable Drainage Systems (SuDS) into new development in order to moderate flows and filter run-off.	Noted.	No change
M14/4 Rhys Evans, Welsh Water, Forward Planning, PO Box 3146, Cardiff, CF30 0EH	14	8.14		Comment	<u>Water</u> With particular regard to 'New House Farm, Marden' for 60 dwellings and 'Rose Villa, Marden' for 5 dwellings, there are no issues in providing a supply of water to the proposed development sites. <u>Sewerage Network</u> It is expected that the public sewerage network can accept the potential foul flows from the growth proposed for this settlement. <u>Sewerage Treatment</u> The Waste Water Treatment Works (WwTW) serving the catchment is currently	Noted.	No change

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					overloaded and is therefore unable to accommodate the flows from the growth proposed. There are no improvements planned within Dwr Cymru Welsh Water's current Asset Management Plan (2010-2015). If the proposed development is to progress in advance of our regulatory improvements, it will be necessary for a feasibility study to be undertaken on the WwTW at the developer's expense. The conclusion of this study will determine any improvement works required.		
M14/5 Gillian Driver, Natural England, Customer Services, Hornbeam House, Crewe Business Park, Electra Way, Crewe, CW1 6GJ	4-5			Comment	<u>Introduction and Background</u> The European designated River Wye Special Area of Conservation (SAC) which is also nationally designated as the River Lugg Site of Special Scientific Interest SSSI runs along the western boundary of the Neighbourhood Development Plan (NDP) area. We would suggest that the Plan is amended to include reference to these important designations in the Introductory section.	Noted. Agreed and amendments made.	Paragraph 2.6 amended to read as follows: <i>The Parish includes the River Wye Special Area of Conservation (SAC), and the River Lugg Site of Special Scientific Interest (SSSI), which runs along the length of the River Lugg on the western boundary of the Parish. The Parish also includes some areas of ancient woodlands. Other areas of the parish are at risk of flooding as shown on the map at Appendix 1. There are currently 54 Listed</i>

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							<i>Buildings within the Parish. A complete list is provided in Appendix 2.</i>
M14/5 Gillian Driver, Natural England, Customer Services, Hornbeam House, Crewe Business Park, Electra Way, Crewe, CW1 6GJ			M1, M2, M3	Object/ Comment	<p><u>Habitats Regulations Assessment (HRA)</u> We note that a number of policies relate to new development (housing and commercial). Natural England is concerned that, given the NDP is progressing in advance of the Local Plan, and cannot therefore rely on its associated HRA, there remains a risk of likely significant effect on the River Wye SAC. We have advised Herefordshire Council that the both the NDP and the HRA would have to be significantly updated, if the NDP is to progress ahead of the Core Strategy. We advise that you discuss with Hereford Council how the NDP could be strengthened to demonstrate that there will be no likely significant effects on the SAC. We have made some suggestions below.</p> <p><u>Policies M1, M2 & M3 – Scale and Type of New Housing Development</u> Natural England disagrees with the conclusion of the HRA, that the measures within these policies, and those within Policies M4 and M11 are sufficient to avoid adverse impacts on the River Wye SAC. We suggest the addition of an additional criterion within these 3 policies to ensure that development can only proceed where</p>	Noted. NDP unlikely to be submitted ahead of adoption of Core strategy. Amendments made to Policies M1, M2 and M3 accordingly.	<p>Amend M1, M2 and M3 to include additional bullet point as follows:</p> <p><i>Ensures that any likely significant effect on the River Wye SAC is avoided or adequately mitigated.</i></p>

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					any likely significant effect on the River Wye SAC can be avoided or mitigated.		
M14/5 Gillian Driver, Natural England, Customer Services, Hornbeam House, Crewe Business Park, Electra Way, Crewe, CW1 6GJ			M10	Support	<u>Policy M10 – Protection of Local Green Spaces</u> Natural England welcomes and supports this policy. We support this policy, but suggest it could go farther by including reference to some of the considerations set out in paragraphs 117 and 118 of the National Planning Policy Framework. These might include designated sites, priority habitats (locally mostly orchards and deciduous woodland) and Ancient Woodlands. You may wish to consider identifying within the plan potential areas to be targeted for creation of wildlife corridors, to improve connectivity between habitats, and could link with any green infrastructure policy additions (see below). The MAGIC website can help you identify areas of priority habitat and ancient woodland.	Noted. Local Green Spaces is a specific designation in Paragraphs 76 & 77 of the NPPF, and the consideration of Paras 117 and 118 would not generally be applicable to designation of Local Green Spaces. However as we have allocated a pond as a Local Green Space on this occasion, we agree with this comment. Policy Amended accordingly.	Policy M10 final paragraph amended as follows: <i>New development which impacts adversely on the openness, biodiversity or geodiversity of these sites will not be permitted.</i>
M14/5 Gillian Driver, Natural England, Customer Services, Hornbeam House, Crewe Business Park,			M12	Comment	<u>Green infrastructure/ Policy M12 – Surface Water Run-off</u> We would advise adding in a policy or expanding Policy M12 – Surface Water Run-off to include green infrastructure: to protect existing green infrastructure within the boundary of the plan area and to promote creation of new green	Noted. The protection, management, and planning for the preservation of existing, and delivery of new green infrastructure is covered in the emerging Herefordshire Core Strategy Policy	An extra sentence to be added to Policy M12 as follows: <i>The protection, management, and planning for the preservation of existing, and delivery of new green</i>

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Electra Way, Crewe, CW1 6GJ					<p>infrastructure if new development proposals come forward.</p> <p>Multi-functional green infrastructure is important to underpin the overall sustainability of a development by performing a range of functions including flood risk management, the provision of accessible green space, climate change adaptation and supporting biodiversity. An example of a green infrastructure provision is sustainable drainage systems. These can deliver benefits for people and for wildlife and make a valuable contribution to the local green infrastructure network. Actions such as re-naturalising watercourses can also bring multifunctional benefits, including benefiting flood attenuation.</p> <p>Such green infrastructure could include traditional orchards and woodland within the parish boundary and other environmental assets in the area to preserve the existing ecosystem network.</p> <p>You may find it helpful to refer to the Herefordshire Green Infrastructure Study (2010).</p> <p>Proposals may present opportunities to incorporate features such as roosting opportunities for bats, the installation of bird nest boxes or the use of native species in the landscape planting and we advise including within a green infrastructure policy</p>	LD3. Agreed that a sentence encouraging Green Infrastructure to be included.	<i>infrastructure is supported in accordance with Herefordshire Core Strategy Policy LD3, to maximise the retention of surface water on sites.</i>

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					the requirement for ecological enhancements.		
M14/5 Gillian Driver, Natural England, Customer Services, Hornbeam House, Crewe Business Park, Electra Way, Crewe, CW1 6GJ			M13	Support	<u>Policy M13 – Public Rights of Way/Connectivity</u> Natural England welcomes and supports this policy.	Noted.	No change
M14/6 Barbara Morgan, Network Rail, 3 rd Floor, Temple Point, Redcliffe Way, Bristol, BS1 6NL				Comment	We note that the Marden Parish area plan includes a section of railway / Network Rail land within their proposal map. We have various level crossings along the stretches of land included in the neighbourhood plan area therefore; Herefordshire Council and Marden Parish Council are urged to note that level crossings can be impacted in a variety of ways by planning proposals: •By a proposal being directly next to a level crossing •By the cumulative effect of development added over time •By the type of crossing involved •By the construction of large developments (commercial and residential) where road	Noted. Agreed.	Relevant section of Network Rail to be consulted at next formal consultation stage

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					<p>access to and from site includes a level crossing</p> <ul style="list-style-type: none"> •By developments that might impede pedestrians ability to hear approaching trains •By proposals that may interfere with pedestrian and vehicle users' ability to see level crossing warning signs •By any developments for schools, colleges or nurseries where minors in numbers may be using a level crossing. <p>Herefordshire Council has a statutory responsibility under planning legislation (Schedule 5 (f) (ii) of the Town & Country Planning (Development Management Procedure) order, 2010) to consult the statutory rail undertaker where a proposal for development is likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over the railway.</p> <p>Herefordshire Council has a statutory responsibility under planning legislation to consult the statutory rail undertaker where a proposal for development is likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway:</p> <ul style="list-style-type: none"> ◦Schedule 5 (f) (ii) of the Town & Country Planning (Development Management Procedure) order, 2010 requires that... 		

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					<p>"Where any proposed development is likely to result in a material increase in volume or a material change in the character of traffic using a level crossing over a railway (public footpath, public or private road) the Planning Authority's Highway Engineer must submit details to both Her Majesty's Railway Inspectorate and Network Rail for separate approval".</p> <p>Therefore, as Marden Parish Council will be the authority in this case they will still need to consult with Network Rail under schedule 5 on their proposals to determine if they impact upon level crossings.</p> <p>It is essential that we are consulted in relation to any future development proposals within the neighbourhood area. Network Rail is a statutory undertaker and as such Local Planning Authorities consult with our Town Planning Teams on a wide variety of proposals that may impact upon Network Rail land and infrastructure. We are consulted on proposals next, near, on, under or over the railway as well as schemes for stations, mining and mineral extraction and proposals that may impact upon Network Rail's access points, level crossings etc.</p> <p>We are concerned that the Marden Neighbourhood Plan Area which shares a boundary with the railway may result in</p>		

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					<p>proposals being undertaken near or next to the operational railway / Network Rail land which may impact upon its safety and operation as we will not have the opportunity (as via the current planning application notification process) to review and pass comments on vital asset protection measures to the council and developer/applicant. Equally we would be concerned if any Network Rail rights of access were affected by proposals, as these require unblocked access around the clock.</p> <p>In light of the above, we would request that Marden Parish Council contact Network Rail in relation to proposals which could impact upon Network Rail's land and the railway infrastructure including:</p> <ul style="list-style-type: none"> •Access points •Drainage works / water features •Encroachment of land or air-space •Excavation works •Siting of structures/building less than 2m from the Network Rail boundary •Lighting impacting upon train drivers ability to perceive signals •Any piling works •Scaffolding works, any use of crane or plant •Any fencing works •Any demolition works 		

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					We would recommend that Marden Parish Council are made aware that any proposal within 10m of the operational railway boundary will also require review and contact made to Network Rail's Town Planning Team for development for review and comment. All initial proposals should be sent to Network Rail Town Planning Team		
M14/7 Graeme Irwin, Environment Agency, Hafren House, Welshpool Road, Shelton, Shrewsbury, SY3 8BB				Comment	<u>Evidence Base:</u> Immediately prior to Herefordshire Council's Core Strategy (CS) Examination in Public (EiP) we were engaged in discussions with regards to the robustness of the evidence base supporting the strategic submission. Specifically we sought to assist your Council in ensuring the Strategic Flood Risk Assessment (SFRA) and Water Cycle Study (WCS) were sufficiently robust. We concluded that the WCS and SFRA addendum documents provided an evidence base to inform the plan. Whilst this was deemed sufficient for the strategic sites within the County we are now seeking to discuss a mechanism for dealing with Neighbourhood Plan site allocations. We are therefore looking to meet with your Neighbourhood Planning team to ensure the updated evidence base relating to the WCS and SFRA is fed into the Neighbourhood Planning process.	Noted.	No change

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					Both the WCS and the SFRA are key tools to ensure the Council are abreast of the infrastructure requirements of the Borough and that all the forthcoming Neighbourhood Plans are consistent with the wider aims and aspiration of the area. Notwithstanding the above I would offer the following comments for your consideration at this time.		
M14/7 Graeme Irwin, Environment Agency, Hafren House, Welshpool Road, Shelton, Shrewsbury, SY3 8BB			M12	Comment	<u>Flood Risk and Surface Water Management</u> : The submitted plan correctly notes that the River Lugg borders the western side of the Parish and the associated flood risk from the Lugg does impact upon the surrounding area. However, with reference to Appendices 7 and 8 (Maps of sites), all the potential sites put forward are shown to fall within Flood Zone 1, the low risk Zone. This is land where the indicative annual probability of flooding is between 1 in 100 and 1 in 1000 years from river sources (i.e. between 1% and 0.1% chance in any given year). We would expect the document to confirm this point; that all built development (proposed and windfall) will be located within Flood Zone 1 and that it should accord with existing planning policy, in this instance the National Planning Policy Guidance (NPPG) and Herefordshire Council's Core Strategy (inc. SFRA and	Noted. Agreed and amended.	Retitle policy M12 to include Flood Risk in the title. Amend policy to include the following sentence: <i>Opportunities, where appropriate, should help to conserve and enhance watercourses and riverside habitats. Where necessary, this should be through management and mitigation measures for the improvement and/or enhancement of water quality and habitat of any aquatic environment in or adjoining the development site.</i>

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					<p>WCS). This could be picked up in associated text for Policy M12 (Surface Water Run-Off).</p> <p>It may be worth re-titling Policy M12 to read as 'Flood Risk and Surface Water Management' for greater clarity. With specific reference to site 11 (Land for future residential development), the largest of the potential sites, we acknowledge that it is located within Flood Zone 1, the low risk Zone. However, a site specific Flood Risk Assessment (FRA) will be required to accompany any development of this site as it is in excess of 1ha and there is potential for increased surface water runoff (as picked up in Policy M12). However there is also a small 'ordinary watercourse' to the immediate south of the site and any FRA will also need to confirm that there is no flood risk associated with this as the upstream catchment is less than 3km² in size and therefore falls below the threshold of our national generalised mapping technique. The lack of Flood Zones associated with the watercourse at this location does not mean that flooding is not an issue.</p> <p>We welcome reference to SuDS and would expect reference to design standards and the types of options available to reduce flood risk, improve water quality</p>		

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					<p>(contributing to wider Water Framework Directive (WFD) objectives) and improve ecology. Whilst, this detail would also be informed by discussion with your own Land Drainage team, we include the following wording to assist: opportunities, where appropriate, should help to conserve and enhance watercourses and riverside habitats. Where necessary, this should be through management and mitigation measures for the improvement and/or enhancement of water quality and habitat of any aquatic environment in or adjoining the development site.</p> <p><u>Foul Water Drainage:</u> As noted in the SEA Scoping Report all new development throughout the parish should be assessed against the capacity of local infrastructure. In this instance we would expect consultation with Welsh Water to ensure that the scale of development can be accommodated. As you are aware, as part of the WSC update/addendum, an assessment of Sewage Treatment Works within the County was undertaken with data collated by both Welsh Water and ourselves. The Marden Neighbourhood Plan should make reference to this information to provide re-assurance that there is adequate foul infrastructure to accommodate growth throughout the plan period. Specific to the</p>		

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					Marden Parish, and the limited scale of potential development, this is unlikely to cause problems but clarification should be sought and provided in any future revisions to the Plan.		
M14/8 Ian Stevens, Savills, Embassy House, Queen Avenue, Bristol, BS8 1SB	13	8.10		Object	<p>These representations have been prepared by Savills on behalf of Farmcare Ltd, which has an interest in lands at Burmarsh. They have been prepared in the context of the examination of the Herefordshire Core Strategy and specifically for Rural Policies. We have concerns with the Parish Council's approach and consider that proceeding on the basis of the current policies creates uncertainty and potential confusion for stakeholders and members of the public. <u>Conformity with the Core Strategy and Prematurity.</u></p> <p>Only a draft NDP or Order that meets the basic conditions set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 can be put to a referendum and be made. These conditions are applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004 and are as follows (our emphasis added):</p> <p>a. Having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan).</p>	Noted. In accordance with the legislation, alongside the future version of the Marden Neighbourhood Development Plan submitted to Herefordshire Council, will be a statement stating how the plan complies with the Basic Conditions of the Localism Act. The basic conditions are set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004.	Policy M3 (now M2) to be amended in line with the modifications to the Herefordshire Core Strategy.

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					<p>b. Having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order. This applies only to Orders.</p> <p>c. Having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order. This applies only to Orders.</p> <p>d. <u>The making of the order (or neighbourhood plan) contributes to the achievement of sustainable development.</u></p> <p>e. <u>The making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).</u></p> <p>f. The making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations.</p> <p>g. Prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan).</p> <p>Consistent with the legislation, the National Planning Policy Framework (NPPF) clearly</p>		

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					<p>states that a NDP should be in general conformity with the strategic policies – including housing requirements – of the Local Plan, in this case the Herefordshire Core Strategy. It then goes on to state at paragraph 184 the following, which is of direct significance to the Marden NDP:</p> <p>“The ambition of the neighbourhood should be aligned with the strategic needs and priorities of the wider local area.</p> <p><u>Neighbourhood plans must be in general conformity with the strategic policies of the Local Plan.</u> To facilitate this, local planning authorities should set out clearly their strategic policies for the area and ensure that an up-to-date Local Plan is in place as quickly as possible. Neighbourhood plans should reflect these policies and neighbourhoods should plan positively to support them. <u>Neighbourhood plans and orders should not promote less development than set out in the Local Plan or undermine its strategic policies.</u>” [Our emphasis]</p> <p>Chapters 5 and 6 of the draft NDP outline the approach taken in ensuring that the Plan is in general conformity with the strategic policies contained in the development plan. It refers to the Herefordshire Unitary Development Plan (UDP) which is now out of date and there have been numerous</p>	<p>Whilst the UDP is out of date it remains to be referenced in the supporting text as it is the adopted plan for the area. The further through the process the Core Strategy goes the more weight it carries. As and when the Core Strategy is adopted, all references to the UDP will be removed.</p>	No change

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					<p>changes to national planning policy and guidance in the period since the UDP was adopted. In light of the Council's lack of five-year housing land supply and the Government's presumption in favour of sustainable development, little weight can be attached to the plan's rural housing policies.</p> <p>Notwithstanding the situation with the UDP, you will be aware that the Herefordshire Core Strategy examination is ongoing and there was a hearing session held on 18 February covering the rural housing Policies RA1 and RA2. At this session the Council confirmed that the Policy RA1 indicative housing growth target of 18% applies to all villages in Marden Parish listed in Figures 4.20 and 4.21 of the Core Strategy.</p> <p>Burmarsh is therefore identified as a village for an 18% proportional housing growth target. This would equate to approximately 6 dwellings for Burmarsh village based on the Council's evidence.</p> <p>The hearing session considered the ability of villages to deliver this level of growth that essentially relies on the Parish Councils producing NDPs. The interim findings from the Inspector, together with any proposed modifications from the Council to the Policy details are likely to be published soon.</p>	<p>This draft was consulted on during the examination process. The housing section will be amended accordingly to take account of the modifications to the Core Strategy.</p> <p>Not agreed. This interpretation of RA1 and RA2 and 18% for Burmarsh is incorrect.</p> <p>The proposed modifications state at 4.8.26: 'The proportional growth target within policy RA1 will provide the basis for the minimum level of new housing that will be accommodated in each neighbourhood development plan. The target represents a level of growth for settlements, as a</p>	No change

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					<p>Given this, there is uncertainty in terms of the precise requirements of Policy RA1 at present which the NDP will need to conform with.</p> <p><u>Site Assessments</u></p> <p>The Government's Planning Practice Guidance includes information on site assessment methodologies. It states that Parish councils may use the methodology to assess sites and may also refer to existing site assessments prepared by the local planning authority as a starting point when identifying sites to allocate within a neighbourhood plan.</p> <p>Paragraph 8.10 of the NDP states that '14 submitted sites were in open countryside or hamlets surrounding Marden and could not be allocated within this Neighbourhood Development Plan. They are subject to the National Planning Policy Framework 2011 that states housing should be located where it will enhance or maintain the vitality of rural communities, or they have to comply with Policy H2 for rural exception sites of Herefordshire Council's emerging Core Strategy.'</p> <p>The Marden NDP has not proposed any housing site allocations in the villages outside of Marden itself, instead they have been discounted on the basis of being in</p>	percentage, that is proportionate to existing HMA characteristics. For individual settlements in each HMA, this will be reflected as a percentage of the total number of dwellings in the parish concerned. In parishes which have more than one settlement listed in Figure 4.20 and 4.21 the relevant neighbourhood development plan will have appropriate flexibility to apportion the minimum housing requirement between the settlements concerned. This will allow for a locally flexible approach that will respect settlement characteristics, the distribution of local facilities and other local factors.'	

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					<p>'open countryside' or too small to warrant an allocation. We cover both matters below. The call for sites assessment methodology applies a location filter which appears to penalise sites outside of Marden given that they would automatically be classed as 'open countryside' and score '0' as opposed to scoring '3' if it was within the settlement boundary. Any sites in Burmarsh which may be well related physically and visually to the existing village are immediately scored '0' without any degree of proportionality applied between sites included in Figures 4.20 and 4.21, and sites that are physically and visually isolated from those named villages. This is an important distinction and one which should be reviewed particularly in light of the Inspector's (and other representors') concerns regarding the strict tests under Policy RA2 in the Core Strategy. RA2 applies a further policy test to development in the smaller villages that includes Burmarsh. The draft Policy effectively limits any housing to either affordable housing or market housing for existing residents of the village and their relatives or full time workers employed within the Parish. This approach would be so restrictive as to be both unviable for a</p>	<p>At the point in time the site assessments were carried out, development in the villages outside of Marden was to be restricted to market homes which meet the needs of people with local connections or affordable housing.</p> <p>As each of these were to be demonstrated by an applicant, it was inappropriate to allocate housing in these settlements.</p> <p>An amended policy for housing in the three identified settlements outside of Marden, based on the modifications to the Core Strategy.</p>	No change

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					developer but also unenforceable from the Council's point of view. During the hearing session the Inspector instructed the Council to review the policy and delete policy tests in respect of residential development in the smaller villages including Burmarsh. It is incumbent upon the Council to produce a revised policy soon. We understand that the proposed modifications will be published soon and will be the subject of a six week consultation period.		
M14/8 Ian Stevens, Savills, Embassy House, Queen Avenue, Bristol, BS8 1SB	15	8.15		Object	Nevertheless, the draft Marden NDP has included an objective to '...ensure that housing development in the surrounding hamlets of Litmarsh, Burmarsh, The Vault and other hamlets is managed appropriately.' Accordingly, it has included Policy M3 which restricts housing in these villages similar to the additional criteria under draft Policy RA2.	Noted.	Policy M3 (now M2) to be amended in line with the modifications to the Herefordshire Core Strategy.
M14/8 Ian Stevens, Savills, Embassy House, Queen Avenue, Bristol, BS8 1SB	16		M3	Object	Given the significant concerns raised with the application of Policy RA2, we consider that the draft NDP should remove Policy M3 as a first step and await the Inspector's findings with regard to the Core Strategy and specifically Policy RA2. We also have concerns with the site assessment methodology used which considers that sites of 1-4 dwellings are not	Noted. Policy M3 (now M2) to be amended. The site assessments were carried out by Kirkwells Ltd. The scoring criteria is based on a criteria used industry wide to assess	Policy M3 (now M2) to be amended in line with the modifications to the Herefordshire Core Strategy. Further work to be undertaken by Steering Group in relation to

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					<p>suitable as an allocation. The sites submitted on behalf of our clients range in potential capacities from 1-9 dwellings, based on the standard 25 dwelling per hectare density applied in the site methodology. This density target appears restrictive and there is no evidence that it is supported by any local contextual analysis of area character and site opportunities and constraints, which is a requirement in Policy SS2 of the Core Strategy for seeking lower densities 'in sensitive areas' outside of the target 30-50 dwellings per hectare target which is also stated in the policy.</p> <p>Finally, we also have concerns with the range of, and consistency in applying, the site assessment criteria to sites submitted in Burmarsh.</p> <p>Many of the site analyses have misinterpreted the details of a site's location and relationship to the rural villages. For example Site Reference 4 - Land to the south of No 14, Burmarsh Cottages, is stated to be an isolated site; yet, in the same paragraph it adds that the site is infill and can be integrated with surrounding built environment. We therefore request that the site assessment criteria is reviewed in light of these inconsistencies, including proximity to bus stops and services.</p>	<p>suitability of sites for future development.</p> <p>At the point in time the site assessments were carried out, development in the villages outside of Marden was to be restricted to market homes which meet the needs of people with local connections or affordable housing. As each of these were to be demonstrated by an applicant, it was inappropriate to allocate housing in these settlements.</p> <p>The density target applied was appropriate to the rural area, and is in the assessment for guidance.</p> <p>With regard to the individual site analysis, the "isolated" refers to the distance from the</p>	Burmarsh, Litmarsh and The Vault.

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					<p>The final assessment that each site is inappropriate for allocation fails to respond to the need to deliver approximately 18% growth in Burmarsh village.</p> <p><u>Conclusion</u></p> <p>Progressing the NDP in its current form would be premature given the uncertainty surrounding the rural housing Policies of the Herefordshire Core Strategy.</p> <p>We consider that progress on the NDP should be suspended pending the outcome of the Core Strategy, particularly in respect of the significant revisions to Policies RA2, currently being prepared by the Council .</p> <p>The site assessment methodology should be reviewed and sites reconsidered given the inconsistencies between the NDP and the proposed amendments to Policy RA2 which would remove the restrictions which were relied upon to discount sites in Burmarsh through the site assessment process in the NDP.</p>	<p>main settlement facilities, whereas the “infill” relates to the site’s context.</p> <p>The plan is not required to identify an 18% growth in Burmarsh, it should direct development towards the main settlement within the Parish, with further development in other identified settlements subject to a criteria based approach.</p> <p>The plan is to be amended to take account of the main modifications to the Herefordshire Core Strategy.</p>	
M14/9 Development Management, Herefordshire Council				Comment	<p>On the whole, I found this document very legible and realistic. There are no significant concerns about utilising it for decision-making. I would however make the following comments:</p> <p>(a) Aspirations around promoting the use of highly sustainable construction techniques need to be managed in the</p>	Noted.	Text amended as below.

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					<p>context of the national picture which currently envisages delivering this through the application of Building Regulations. Clearly a policy that promotes the inclusion of such techniques is welcome but would not necessarily be a basis for refusing permission if the applicant could demonstrate compliance with a national standard</p> <p>(b) In relation to policy M6, it may be worth developing the list of community facilities. Naming them and explaining why they perform this function. In particular having recently been looking at CAMRA guidance, trying to define the particular value of a public house can be very important in protecting it from redevelopment.</p> <p>(c) Policy M8 VII needs to define what is meant by a “significant period of time”. 6 months is generally regarded as sufficient but they may want to seek guidance from a specialist agent</p> <p>(d) Policy M9 (and others e.g. M13) where the use of terminology “all development”. It would not be possible for example to require an extension to a dwelling to demonstrate delivery of broadband. Notwithstanding the obvious benefits, I am sceptical of how the Planning system can require developers to deliver</p>	<p>Community facilities are listed at the bottom of the policy. Given the nature of the majority of the facilities, this is not considered necessary.</p> <p>Agreed. Amend Policy M8 VII (now (g)) accordingly.</p> <p>Agreed. Amend Policy M9 accordingly.</p>	<p>Policy M8 VII (now (g)) amended to read:</p> <p><i>The employment premises have been empty for six months or more and during that time actively marketed without securing a viable alternative employment use.</i></p> <p>Policy M9 amended to read:</p> <p><i>All new residential and commercial development</i></p>

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					such matters when this is essentially in the hands of a third party (i.e. the Broadband provider). I feel that the PC needs to consider when and how to apply this requirement.		<i>will be required to facilitate the infrastructure to support high speed broadband.</i>
M14/10 Strategic Housing, Herefordshire Council			M2 and Glossary of terms	Comment	<p>Objective 2 Policy M3 doesn't mention affordable housing and I think it should be included with agricultural and forestry in the hamlets.</p> <p><u>Glossary of terms: Amendments needed</u></p> <p>Affordable rented: Housing let be local authorities or registered providers to persons who are eligible for Social Rented Housing. Affordable Rented Housing is subject to rent controls that require no more of 80% of the Open Market Rent (including services charges, where applicable)</p> <p>Housing Affordability: Housing affordability is the price of a house divided by household incomes. When measuring affordability regard must be taken to local incomes and local house prices. A household can be considered able to afford to buy a home if it costs 3.5 times the annual gross household income, above this is deemed to be less affordable.</p> <p>Intermediate housing: Homes for purchase or rent provided at a cost above social rent, but below market levels. These can include Shared Ownership, Low Cost Market and Intermediate Rental.</p>	<p>Noted. Agreed. Policy M3 (now M2) amended.</p> <p>The Glossary of terms is taken directly from the Herefordshire Core Strategy. In order to remain consistent, this NDP will reflect exactly the definition in the Core Strategy.</p>	No change

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					<p>Intermediate Rental: Homes for rent provided at a cost above social rent but below market levels</p> <p>Low Cost Market Housing: Housing sold at a price lower than the open market value to households in housing need who could not otherwise afford to purchase.</p> <p>Registered Social Housing Providers: A registered provider of affordable housing under part 2 of the Housing and Regeneration Act 2008.</p> <p>Shared ownership: Enables you to buy a share in a property and pay rent on the remaining share which is owned by a housing provider. Usually the maximum share owned cannot exceed 80% of the property value.</p> <p>Social Rented Housing: Is owned by local authorities and registered providers for which guideline target rents are determined through the national rent regime.</p>		
M14/11 Environmental Health, Herefordshire Council				Comment	<p>I refer to the above and would make the following comments with regard to the proposed development areas identified in the 'Marden draft Neighbourhood Development Plan':</p> <p>Having reviewed records readily available, I would advise that the two areas of land (as identified in the key as "Land allocated for future residential development" and indicated in orange on the map) in Appendix</p>	Noted. Agreed. Policy M4 amended to include contamination.	<p>Policy M4 amended to include additional bullet point as follows:</p> <p><i>(g)Where contaminated land is present, includes appropriate remediation where it can be demonstrated that this will be effective.</i></p>

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					<p>9 - Map of Allocated Sites Map of Allocated Sites – with amended settlement boundary” appear, from a review of Ordnance survey historical plans to have historically been 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.</p> <p><u>General comments:</u></p> <p>Developments such as hospitals, homes and schools may be considered ‘sensitive’ and as such consideration should be given to risk from contamination notwithstanding any comments. Please note that the above does not constitute a detailed investigation or desk study to consider risk from contamination. Should any information about the former uses of the proposed development areas be available I would recommend they be submitted for consideration as they may change the comments provided.</p> <p>Finally it should be recognised that contamination is a material planning consideration and is referred to within the NPPF. I would recommend applicants and those involved in the parish plan refer to the pertinent parts of the NPPF and be familiar with the requirements and meanings given</p>		

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					when considering risk from contamination during development. These comments are provided on the basis that any other developments would be subject to application through the normal planning process.		
M14/12 Harrison Clark Rickerbys Solicitors, 5 Deansway, Worcester, WR1 2JG				Object	<p>We write on behalf of Mr Richard Paske of Wisteston Farm, Marden, to register a strong objection to the Regulation 14 Consultation Draft of the Marden Neighbourhood Development Plan ("the Draft NDP").</p> <p>We would like to make clear that our client is supportive of Marden Parish Council ("the Parish Council") preparing a Neighbourhood Plan, and agrees with the seven objectives for the development of Marden identified in the Draft NDP. However, the method of preparation of the Draft NDP, and in particular the site allocation process, is misconceived, and the Draft NDP is, as a result, fundamentally flawed.</p> <p>The adoption of the Draft NDP in its current form would, therefore, be susceptible to legal challenge by way of judicial review, and significant changes are required to rectify the legal errors.</p> <p>These points are discussed in further detail below.</p> <p><u>1. Site Assessment</u></p>	<p>Noted.</p> <p>1.Site Assessment</p> <p>The scoring criteria is based on a criteria used industry wide to assess suitability of sites for future development. The scoring of the suitability of the site is one element of the process. The Site assessment report is a technical recommendation based on a desk-based study and a site visit.</p> <p>With regard to the defining of Site 17 as "inappropriate". This stems from the future development of this site extending the village</p>	No change

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					<p>In accordance with local and national policy, a significant amount of housing is required to be delivered in Herefordshire in the period to 2031, and our client therefore agrees that it is very important that new housing is accommodated within the parish of Marden.</p> <p>However the assessment of the 21 sites put forward by landowners by the Parish Council's retained planning consultants, Kirkwells, and the way that this information was then used by the Parish Council, has not been fair nor objective, and also appears to have been improper.</p> <p>Kirkwells' findings were set out in their 'Call for Sites Assessment Report' in December 2014, which was amended by a supplemental report in January 2015 (together "Kirkwells' Report"). Kirkwells' Report purports to be prepared in accordance with the guidance provided by Herefordshire Council in its guidance note 'Neighbourhood Planning Guidance Note 21: Guide to site assessment and choosing allocation sites' ("Guidance Note 21 "), however it is clear that the Report does not meet Herefordshire Council's requirements. Guidance Note 21 states that: "the site selection process will have to be carried out in <u>an open and transparent way</u>, including</p>	<p>significantly in a northerly direction which would be at odds with the historic growth of Marden which has resulted in the form the village holds today.</p> <p>Site 14 - the section of the site which is within the settlement boundary and contains the barn can accommodate approximately two dwellings. It is not general practice to allocate sites under 5 dwellings. These smaller sites are addressed within the criteria in the policy.</p> <p>Site 13 – agree that development of the site to the rear of the settlement boundary southwards would extend the village to an unacceptable degree.</p>	<p>No change</p> <p>No change</p>

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					<p>consultation with the community and the production of a full evidence base <u>to support and justify the conclusions reached'</u> (emphasis added).</p> <p>Unfortunately the Kirkwells' Report falls significantly short of these requirements. The approach taken in the Kirkwells' Report to the site assessment is to score sites against criteria, being: (a) Location, (b) Greenfield or Brownfield land, (c) Access to services, (d) Accessibility to Community Centre, (e) Flood zone, and (f) Suitability I Constraints.</p> <p>This is an approach consistent with Guidance Note 21, except that Guidance Note 21 requires <u>reasons</u> to be given for the assessment, particularly for the assessment under part (f) above, namely Suitability and Constraints.</p> <p>The Kirkwells' Report provides a 'Site Analysis' of each site, and lists the score given to each site against the criteria identified (Appendix 2), however the Kirkwells' Report offers little explanation for the basis for the scoring of the sites in its explanation of the methodology used in paragraph 3.2, and some of the results of the assessment appear to be entirely illogical.</p> <p>This can be seen most clearly in the assessment of Suitability and Constraints,</p>	<p>Site 11 –The site is adjacent to the school and the playing fields which extend to the watercourse at the rear. The site assessment report states that frontage development on this site can integrate well with the village, however, it is an isolated site on the edge of the village.</p> <p>Professional opinion is not unlawful.</p> <p>The Steering Group at the meeting used the scoring as a base and local knowledge and advice from Kirkwells on natural extensions to a village and concluded that the front of Site 13 should be included in the public consultation rather than the whole site. In addition, the front of Site 17, which was put forward later,</p>	<p>No change</p> <p>No change</p>

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					<p>where sites were scored as being 'Unconstrained', having 'Minor Constraints', having 'Significant Constraints', or to be 'Inappropriate'.</p> <p>Seven of the 21 sites were assessed to be 'Inappropriate'. Six of these sites are small sites suitable for 10 residential units or fewer which are isolated sites a long way from Marden's settlement boundary and community centre. However the seventh site, Site 17, is adjacent to the settlement boundary and just over 500 metres to the community centre. It is in an area of lower flood risk, and does not have any obvious physical or planning policy constraints. As the Parish Council will be aware, this Site 17 is the subject of a current planning application for residential development, and to date none of the statutory consultees who have been consulted as part of that application process has raised any objection or concern as to the suitability of Site 17 for residential use.</p> <p>This is a strong indication that the Kirkwells' Report's assessment of Site 17 as 'Inappropriate' is without rational basis. An unfair and inconsistent approach is also evident in the way Site 14 has been assessed by the Steering Group. This site is assessed by the Kirkwells' Report as having the potential to accommodate 5 houses,</p>	<p>was included in the public consultation rather than the whole site initially included.</p> <p>The Steering Group believe the site selection process was undertaken in an open and transparent way at meetings that were open to and attended by the public, including the landowners of site 17. The rationale for choosing specific sites and options for development in/adjacent to the Marden village settlement boundary is in the notes of the Steering Group meetings.</p>	No change

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					<p>with part of this site actually being within the settlement boundary. However the Draft NDP states that it is only suitable for 2 houses, and so is too small to be taken to public consultation. There is again, no justification or explanation of why the site has been assessed in this way.</p> <p>The treatment of Site 13 is a further illustration of the unlawful approach taken to the site assessment process. Site 13 was originally put forward as a larger site to accommodate 32 houses, however the Kirkwells Report' concluded that the rear of the site would extend the village to the south to an unacceptable degree.</p> <p>This is at complete odds with the assessment of Site 11 in the Kirkwells' Report. Site 11 proposes to extend the village to the south to the same extent as Site 13, however in the case of Site 11, the site is assessed to be "frontage development which can integrate well into the village". The different treatment of the two sites is difficult to comprehend.</p> <p>Following the assessment of Site 13 in the Kirkwells' Report, the Steering Group decided to only take the front part of Site 13 to the public consultation. This again, is a decision made by the Steering Group without any clear or transparent reasons,</p>		

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					<p>and severely undermines the effectiveness of the public consultation. It is clear in any event that the Kirkwells' Report is flawed in that it is not transparent in its assessment of the sites, nor does it support and justify the conclusion reached. This error is further compounded by the Steering Group's decision to select sites for the public consultation without any clarity nor transparency as to how the site selections had been made.</p> <p><u>2. Public Consultation Open Event</u> In response to the Kirkwells' Report, the Marden Neighbourhood Plan Steering Group ("the Steering Group") held a public consultation on 10th and 11th January to consider the five sites most suitable for allocation in the Neighbourhood Plan. However the five sites selected by the Steering Group for the consultation were not the sites which came out the highest in terms of the identified criteria in the Kirkwells' Report, but instead were the sites which were in or adjacent to the settlement boundary, being Sites 13, 15, 11, 16, and 17.</p> <p>There is no explanation offered for why the site selection assessment was changed from those established in the Kirkwells' Report to those sites in or adjacent to the current settlement boundary, other than the</p>	<p>2. Public Open Event</p> <p>Displays at the open event community consultation included: the rationale and the site scoring form. The options for the consultation included the objectives for the draft NDP and the Steering Group's view of how well each option met the objectives for each site/option. It is the Steering Group's role to recommend options for consultation.</p> <p>Sites outside and not adjacent to the settlement boundary were not allowed to be allocated in the process valid at that time.</p> <p>As before – rationale was on public display and the full assessment report and addendum</p>	No change

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					<p>Marden Neighbourhood Plan Steering Group ("the Steering Group") considered them to be suitable for public consultation. Whilst our client does, in fact, agree that considering the sites in or adjacent to the current settlement boundary is a sensible and correct method of selecting the sites, this decision of the Steering Group again lacks the transparency and justified reasoning that is required in any site allocation process. It also puts clear doubt on the effectiveness of the site assessment in the Kirkwells' Report, if the Steering Group is not prepared to accept the outcome of the site assessment therein. An edited part of the Kirkwells' Report 'Site analysis' for the chosen five sites was, however, displayed prominently at the public consultation.</p> <p>In fact, it was only the outcome of the 'Suitability I Constraints' criteria which was displayed, with the other, equally important (in terms of the Kirkwells' Report scoring) criteria, such as the Location, Accessibility to Community Centre, and Flood zone, omitted from the display entirely.</p> <p>This is a far cry from the open and transparent assessment of sites required. The approach of the Steering Group appears to be that they "pick and choose" the elements of the Kirkwells' Report which</p>	<p>were available for the public.</p> <p>As before – process was valid at time was used.</p> <p>Explanation in notes of meetings and on display. The Steering Group is not required to only use the site assessment but can and did consider the NDP's objectives and judge how well the objectives would be met by each site/option of sites.</p> <p>The table with these data was displayed.</p>	

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					<p>supports their purpose, rather than present the information fairly. It is clear that the information displayed at the public consultation by the Steering Group, whether a deliberate attempt to influence the consultation outcome, or by negligence, is a clear breach of the requirements. There is no doubt that the display of Site 17 with the words "Final Assessment - Inappropriate" without presenting any of the areas where the site scored well, and without reasons for the Suitability I Constraints assessment is not a fair or balanced presentation of the Site. It has the potential to bias members of the community attending the consultation against the Site, and is not a lawful way of presenting the sites.</p> <p>In summary, to proceed to allocate sites on the basis of the outcome of this public consultation would be unlawful as the way the public consultation has been conducted was not transparent nor fair.</p> <p>3. <u>Bias of the Steering Group</u> In addition to the points raised above, we would like to register a serious concern as to whether the Steering Group acted impartially when selecting the sites for allocation.</p> <p>The Chairman of the Steering Group throughout the site allocation process was</p>	<p>3. Bias of the Steering Group</p> <p>Michael Parkes and Arthur Fraser did not take part in the discussions about site</p>	No change

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					<p>Councillor Michael Parkes, who has a declared conflict of interest in respect of Site 17, as his property overlooks the site. Additionally, the Vice-Chair of the Steering Group is Councillor Arthur Fraser, who also has a declared conflict of interest in respect of Site 17 as his property also overlooks the site.</p> <p>It is entirely inappropriate for two Councillors with personal interests in the site selection to take an active role in the site allocation process, as there is a clear risk of bias. Both Councillors are known to have very strong personal views in relation to the proposed development of Site 17, as can be seen from their representations in relation to the current planning application for the residential development of that site. It is noted that Councillor Parkes has now resigned as Chairman of the Steering Group, however this resignation was only given at the full Parish Council meeting on Monday 12th January, notably after the public consultation event on 10th and 11th January. Councillor Parkes not only attended the public consultation event personally on both days, but took a very active role in welcoming members of the public, explaining the information displayed, and answering questions. This means that there is a significant and unacceptable risk</p>	<p>17 as shown in notes of meetings.</p> <p>Parish Councillors and Steering Group members are entitled to express their personal opinion when responding to planning applications.</p> <p>Michael Parkes stood down as Chair of the Steering Group the day before the consultation events, which was ratified by the Parish Council at the meeting on 12 January 2015.</p> <p>ALL members of the Steering Group refrained from showing bias towards ANY site and did not influence the outcome of the public vote.</p> <p>It could be seen that the landowners tried to bias the vote by</p>	

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					<p>that Councillor Parkes may have abused his position as Parish Councillor and Chairman of the Steering Group to influence the outcome of the public votes at the consultation event.</p> <p>It is interesting to note that although Site 17 was very marginally voted the least favourable of the five sites by the members of the public who voted at the public consultation event, this is not something which most members of the community feel strongly enough about to object to the current planning application to develop Site 17 for residential use.</p> <p>It is notable that there have only been a few representations from members of the community in relation to the current planning application, and five of those, Michael Parkes, Ashley Robin Brook, William Wright, David Bennett, and Arthur Fraser are members of the Parish Council or Steering Group, and a sixth from Ms Fraser, who is an immediate relative of the Vice Chair of the Steering Group. This does give weight to the concern that the outcome of the public consultation event was not truly representative of the views of the community.</p> <p>It is also worth noting that we are aware that the Steering Group also kept a running total of public votes in relation to each of the five</p>	<p>delivering a flyer to houses the night before the event and this comment was made by a number of parishioners.</p> <p>The planning application was submitted (12 February) after the decisions made by the Parish Council for Regulation 14 Consultation (2 February 2015). The number of representations to a planning application are not relevant to the Neighbourhood Planning process.</p> <p>The statement in relation to knowledge being used to influence other members of the public is untrue. The Clerk did not undertake this analysis until after the event.</p>	

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					<p>sites which was available to all members of the Steering Group throughout the public consultation event.</p> <p>There is absolutely no justification for the Steering Group having access to the outcome of the public votes until after the close of the consultation. There is a significant risk that this knowledge could be used to influence other members of the public attending the consultation, and this approach is therefore unlawful.</p> <p>There is also a suggestion that the Parish Council may be biased towards the development at New House Farm (Site 11), as it has been recorded in the minutes of Parish Council meetings that the Parish Council are taking active steps to seek to locate the Village Clock within the proposed new development there. It is, of course, entirely inappropriate and unlawful to take any non-planning reasons into account when considering site allocations.</p> <p>4. <u>Conformity with Herefordshire Core Strategy</u></p> <p>As the Parish Council is aware, it is a requirement that the Marden Neighbourhood Plan must be in conformity with both national planning policy and Herefordshire Council's Local Development Plan.</p>	<p>Many suggestions for locating the village clock have been considered at Parish Council meetings, including at the church, the school and at a new community centre, if one is ever developed. However this does not constitute bias on the part of the Parish Council when considering planning applications or site allocation in the draft NDP.</p> <p>4. Conformity with Herefordshire Core Strategy</p> <p>Relevant reassessment of housing required, site allocation and</p>	No change

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					<p>The emerging Herefordshire Core Strategy has to, in line with national policy, provide for sufficient residential development to meet the full Objective Assessed Need for housing in Herefordshire across the plan period.</p> <p>The Neighbourhood Plan will be assessed against the adopted planning policy in place at the time of the Neighbourhood Plan examination, which is likely to be the Herefordshire Core Strategy.</p> <p>However the current policy position is that the Herefordshire Core Strategy Inspector has asked Herefordshire Council to remodel the assessment of both their five year housing land supply and the housing projections for Herefordshire, and to prepare a summary of proposed modifications to the Core Strategy.</p> <p>It is likely that the remodelling exercise will result in a change to the housing requirements and a review of the basis on which sites are intended to be allocated. This is potentially a significant change to the housing policy, and the Draft NDP should not be taken forward until the Objective Assessed Need for housing in Herefordshire has been formally assessed, as otherwise the Steering Group may be advancing a site allocation policy which does not meet the</p>	redrafting of the Plan will be undertaken when the modifications to the Core Strategy are finalised. Preparatory will be undertaken while awaiting the final report on the Core Strategy.	

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					<p>legal requirement of being in accordance with the strategic policies contained in the Local Development Plan.</p> <p>The Parish Council should also be aware that in the event that the Draft NDP was made prior to the Herefordshire Core Strategy being adopted, the Herefordshire Core Strategy and the need for housing identified therein would take precedence over the Neighbourhood Plan in any case, as confirmed by the recent case of BOW Trading v Cheshire West and Chester Borough Council.</p> <p>In summary, the site allocation process undertaken by the Steering Group has been fundamentally flawed on a number of levels, and the Draft NDP is, as a result, not legally sound.</p> <p>The only appropriate course of action is, once the correct level of housing for Marden has been established following the outcome of the Herefordshire Core Strategy examination, to undertake a further site assessment and further public consultation conducted in a lawful manner with the information being clearly and fairly displayed for each site.</p>	<p>The site allocation process was taken in good faith in a clear and transparent way following Herefordshire Council's guidance on assessment.</p> <p>A further consultation will take place when the plan is revised. Following this and based on any responses, the plan will be revised again and then submitted to Herefordshire Council.</p>	No change

5.0 Modifications Following Regulation 14 Consultation

- 5.1 During the course of the first Regulation 14 consultation, the examination into the Core Strategy was underway. In April 2015, the proposed modifications to the Core Strategy were released. The direct effect of this was that the indicative target for the number of dwellings in Marden parish was increased.
- 5.2 In addition to this the Parish Council considered that it would be appropriate to define settlement boundaries in the three smaller hamlets named in Policy RA2 of the Herefordshire Core Strategy.
- 5.3 Funding of £2,251 was obtained from Groundwork UK Community Rights Programme in June 2015 for professional support to redraft the Plan. A further consultation event was held in July 2015. A flyer was delivered to households in the Parish (Appendix VII). This event concentrated on the changes to the plan following the Regulation 14 consultation, and those required by the major modifications made to the Herefordshire Core Strategy post examination. The event specifically asked for responses about proposed settlement boundaries for the designated hamlets of Litmarsh, Burmarsh and Vault, as these boundaries were required in the Marden Neighbourhood Development Plan. In addition, responses were sought about proposed allocation of further sites for development in Litmarsh and Burmarsh. Photos are included at Appendix VII.
- 5.4 The Steering Group reviewed the results of the July Community Consultation Event (see Appendix VII for the full report) and determined the following:
- The changes to policies and text confirmed and the Plan amended
 - The proposed Settlement Boundary for Litmarsh has been slightly amended in line with the other Settlement Boundaries along roads, but no extension of the Boundary was suitable
 - The proposed site in Litmarsh will not be allocated, as it is for only one house and as the site is adjacent to the Settlement Boundary, the owners could apply for permission with the site considered under the planning process; in addition the Steering Group acknowledge that without this allocation, windfall development can and probably will take place and is better suited to the rural nature of Litmarsh; and also the allocated sites in Marden village have the capacity to exceed the required minimum target for development to 2031
 - The proposed Settlement Boundary for The Vault has been slightly amended to remove an agricultural building from the Boundary, in line with the other Boundaries, but no extension of the Boundary was suitable

- The proposed Settlement Boundary for Burmarsh has been confirmed and no extension of the Boundary was suitable as Fromington, Hawkersland and Franklands Corner are seen as separate rural hamlets by the Steering Group and this view is confirmed in the consultation
- The proposed site in Burmarsh should not be allocated as the issue of the narrow road and poor unsafe access was highlighted in the consultation; the Steering Group acknowledge that without this allocation, windfall and infill development can and probably will take place and is better suited to the rural nature of Burmarsh; and also the allocated sites in Marden village have the capacity to exceed the required minimum target for development to 2031.

6.0 Formal Consultation on the Marden Draft Neighbourhood Development Plan – 3rd September 2015 – 16th October 2015

- 6.1 The public consultation on the Marden Draft Neighbourhood Development Plan was carried out in accordance with The Neighbourhood Planning (General) Regulations 2012 (SI No. 637) Part 5 Pre-submission consultation and publicity, paragraph 14. This states that:

Before submitting a plan proposal to the local planning authority, a qualifying body must—

- (a) publicise, in a manner that is likely to bring it to the attention of people who live, work or carry on business in the neighbourhood area*
- (i) details of the proposals for a neighbourhood development plan;*
- (ii) details of where and when the proposals for a neighbourhood development plan may be inspected;*
- (iii) details of how to make representations; and*
- (iv) the date by which those representations must be received, being not less than 6 weeks from the date on which the draft proposal is first publicised;*
- (b) consult any consultation body referred to in paragraph 1 of Schedule 1 whose interests the qualifying body considers may be affected by the proposals for a neighbourhood development plan; and*
- (c) send a copy of the proposals for a neighbourhood development plan to the local planning authority.*

- 6.2 The Marden Draft Neighbourhood Development Plan was published for 6 weeks formal Public Consultation from 3rd September 2015 – 16th October 2015. The Draft Scoping Report for Strategic Environmental Assessment (SEA) of the Neighbourhood Plan was also published for consultation with English Heritage, Natural England and the Environment Agency by Herefordshire Council when the Draft Plan was published.
- 6.3 The Draft Neighbourhood Plan and a copy of the Response Form were available for viewing and downloading from the Marden Neighbourhood Development Plan website <http://www.mardenvillage.co.uk/parish-council/marden-neighbourhood-development-plan/> with a link from Herefordshire Council's website <https://www.herefordshire.gov.uk/planning-and-building-control/neighbourhood-planning/draft-plans-regulation-14-and-submitted-plans-regulation-16>. Screenshots are included in Appendix VIII. Consultation responses were invited using the accompanying Response Form (Appendix VIII) to the Parish Clerk via an email to mardenclerk@gmail.com or by printing out and submitting to a postal address: 7 John Davies Place, Westcroft, Leominster, Herefordshire, HR6 8JD. Written responses were also invited using the advertised postal address.

- 6.4 An e-mail or letter was sent to all Consultation Bodies, including neighbouring Parish Councils and businesses in the parish, providing information about the consultation dates, and the locations where the Draft Plan and accompanying documents could be viewed and downloaded (Appendix VIII).
- 6.5 The consultation process was also promoted in the following ways:
- A flyer was displayed prominently on 8 notice boards round the Parish (Appendix III)
 - Copy in the Parish Magazine
 - On the welcome page of the parish website, as well as on the Neighbourhood Development Plan pages.
- 6.6 A copy of the Draft Neighbourhood Plan was submitted to Herefordshire Council.

7.0 Summary of Consultation Responses to the Draft Neighbourhood Plan for the consultation 3rd September 2015 – 16th October 2015

7.1 Table 2 below sets out the responses submitted to the Draft Neighbourhood Development Plan, together with information about how these responses have been considered by the Parish Council and have informed the amendments to the Submission Neighbourhood Development Plan. Table 3 sets out the responses to the Draft SEA/HRA.

Table 2 - Marden Draft Neighbourhood Development Plan – Formal Consultation Responses - 3rd September 2015 – 16th October 2015

Consultee Name Address Ref. No.	Page No.	Para. No.	Policy No.	Support / Object / Comment	Comments received	Parish Council Comments	Amendments to NP
M14/10/1 Chris Lambart, Planning Advisor, National Trust				Comment	Thank you for contacting the National Trust regarding the Marden Neighbourhood Plan. The Trust is currently only able to engage with neighbouring plans where they affect property in its protective ownership and will not be commenting on the Marden Neighbourhood Plan. We would like to take the opportunity to wish you well with your plan.	Noted and welcomed.	No change
M14/10/2 Mr and Mrs Paul Sant, Broxash, Litmarsh, HR1 3EZ	52		M2	Comment	As the owner of the piece of land in Litmarsh marked orange on the plan, I would like to repudiate some of the comments made by the public, in particular: “Area of land purchased by owners of Broxash, access behind The Withies, no infill, and was until recently part of large field. Previous planning refused.” The land in question has been owned by my family since 1952, and I have been the owner of this piece since soon after the death of my father in 1983. There has never been a planning application on this land.	Comments noted and accepted.	No change

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					On more general points, the area does not flood, there is a good bus service and modern drainage methods present no problem. I realise the statements made are purely public opinion, but I feel strongly the need to put the record straight on ownership.		
M14/10/2 Mr and Mrs Paul Sant, Broxash, Litmarsh, HR1 3EZ	17		M1	Comment	Historically villages and hamlets have developed and extended naturally as the need arose, resulting in viable communities. Severe restrictions over recent years have resulted in a sudden need for mass development which is contrary to normal rural growth. Mass development, with similar design, is rarely successful. The Government and the County Council now appear to recognise that a more flexible approach to the growth of hamlets should be encouraged. More growth in all the hamlets should result in less pressure on the village centre, where smaller groups of individually designed dwellings could be accommodated on the sites identified.	Site allocation in the hamlets was considered by the Parish Council. Given the small number of dwellings in each hamlet, it was considered that site allocation and extension of the Settlement Boundaries could result in disproportionate development. Development within the Marden village settlement boundary is considered a more suitable and sustainable way for the parish to increase in size.	No change
M14/10/2 Mr and Mrs Paul Sant, Broxash, Litmarsh, HR1 3EZ	51 & 17	2	M2	Comment	Development of the land around Berrington Cottage and Willowfields, the frontage of White Gates, together with the land already designated coloured orange, would cater for all development needs in the near future. Houses of individual designs would enhance the character of the hamlet of Litmarsh.	Extension of the Settlement Boundary could potentially lead to disproportionate overdevelopment of the hamlet. Feedback from the Community Consultation event about concerns with road access were noted. A level of	No change

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						windfall development is expected.	
M14/10/2 Mr and Mrs Paul Sant, Broxash, Litmarsh, HR1 3EZ	53 & 17	5	M2	Comment	Burmarsh – the area marked light green and grey would form a natural grouping and could enhance the quality of the area.	Extension of the Settlement Boundary could potentially lead to disproportionate overdevelopment of the hamlet. Significant feedback from the Community Consultation event about concerns with road access were noted. A level of windfall development is expected.	No change
M14/10/2 Mr and Mrs Paul Sant, Broxash, Litmarsh, HR1 3EZ	52 & 17	4	M2	Comment	The Vault – land between Vault Farm and Norton Court would be a natural development for The Vault.	Extension of the Settlement Boundary could potentially lead to disproportionate overdevelopment of the hamlet. Feedback from the Community Consultation event about concerns with road access were noted. A level of windfall development is expected.	No change
M14/10/2 Mr and Mrs Paul Sant, Broxash, Litmarsh, HR1 3EZ	17		M2	Comment	It is interesting to note that, according to the Ordnance Survey, there were more houses in the hamlets of The Vault, Monmarsh and Urdimmarsh in 1831/32 than there are now.	Noted and accepted.	No change
M14/10/3 Mr Peter Wood, Little	63			Comment	I attended the open day for proposed settlement boundaries on 18th July, and have read the feedback document. Thank you for presenting the proposals in such a clear way.	The line drawn as the settlement boundary is solely for development purposes and does not define the entire	No change

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Fromington, Burmarsh, HR1 3BT					<p>On the feedback form I was unable to express my views for a settlement boundary for the Burmarsh area. The area "Burmarsh" I believe runs the full length of the lane. My address has always been "Burmarsh" but my property is not on your map? Please can the committee reconsider their definition of the area "Burmarsh"?</p> <p>I would like to propose the boundaries are set out as per the map below. I believe there are several natural places on the road to build new housing which would maintain the interesting and diverse character of the road. I do not believe a small development of 3 to 5 houses at the southern end of the road is the ideal place for the following reasons. Blind bends, lots of trees, wildlife and it would be out of character with the road.</p> <p>I am more than willing to meet the committee to discuss. A journey on horseback through Burmarsh is a great way to survey all the opportunities for development on the lane. I am happy to share a horse to facilitate this idea. Thank you for giving us the opportunity to contribute to the project.</p>	<p>natural settlement area. Extension of the Settlement Boundary could potentially lead to disproportionate overdevelopment of the hamlet. Significant feedback from the Community Consultation event about concerns with road access were noted. A level of windfall development is expected.</p> <p>Development at the southern end of the road will be assessed against policies relating to development in open countryside.</p>	
M14/10/4 Rachael A Bust, Chief Planner/ Principal Manager, Planning &				Comment	Thank you for consulting The Coal Authority on the above. Having reviewed your document, I confirm that we have no specific comments to make on it at this stage.	Noted and welcomed.	No change

[illegible]

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					<p>examination and the issuing of the Inspector's Report. The following comments are set out in a positive and constructive manner.</p> <p><u>General Conformity with the Strategic Policies of the Development Plan</u> We have assessed if the NDP meets the Basic Conditions as set out at paragraph 8 (2) of Schedule 48 to the Town and Country Planning Act 1990. These include:</p> <ul style="list-style-type: none"> • The Plan has regard to national policies and advice contained in guidance issued by the Secretary of State; • The Plan contributes to the achievement of sustainable development; • The Plan is in general conformity with the strategic policies contained in the development plan for the area; and, • The Plan does not breach and is otherwise compatible with EU obligations. <p>Of particular importance is the requirement for the NDP to be in general conformity with the strategic policies contained in the development plan. The NDP makes reference to policies in both the Herefordshire Unitary Development Plan and the Core Strategy.</p> <p>On 29 September 2015 the Inspector's Report into the Herefordshire Core Strategy was published. The overall housing requirement</p>	<p>Noted.</p> <p>Noted. At the second Regulation 14 consultation the adopted plan was the Herefordshire UDP. Following adoption of the Core Strategy all references to this will be removed.</p>	<p>References to UDP removed from text as required</p>

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					<p>has been set at a minimum 16,500 dwellings across the Plan area, with a minimum 5,300 dwellings directed to the rural area. The submission rural housing policies RA1 and RA2 were considered to be very prescriptive and the Council subsequently consulted on amended versions of both policies.</p> <p>Policy RA1 apportions the 5,300 rural housing figure across seven Housing Market Areas (HMAs). Burmarsh remains within the Hereford HMA, which retains the 18% indicative housing growth figure. The minimum target represents a level of growth, as a percentage and which is proportionate to existing HMA characteristics.</p> <p>A key inclusion within the Core Strategy modifications is replacement text at paragraph 4.8.26, concerning the role of NDPs and the Policy RA1 proportionate housing growth requirements.</p> <p>This confirms that the 18% indicative housing growth target in the Hereford HMA is proportionate to existing characteristics. For individual settlements in each HMA, this will be reflected as a percentage of the total number of dwellings in the parish concerned. In Marden parish, which has more than one settlement listed in the settlement hierarchy</p>		

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					<p>(Figures 4.20 and 4.21 in the Core Strategy) the NDP will have appropriate flexibility to apportion the minimum housing requirement between the settlements concerned. The Council state that this will allow for a locally flexible approach that will respect settlement characteristics, the distribution of local facilities and other local factors.</p> <p>Policy RA2, which details the housing development criteria for rural settlements, has also been amended in light of the Inspector's concerns. The Inspector acknowledges that the Core Strategy reasonably identifies the most sustainable villages within the HMAs capable of accommodating new housing based on a range of studies of the rural hierarchy and rural housing markets.</p> <p>Given its policy status, one would expect the village of Burmarsh to accommodate a proportion of the future housing growth for the Parish. Indeed, this was proposed by the NDP Steering Group prior to this latest consultation period.</p> <p>We appreciated the opportunity to meet with representatives of the Steering Group in Marden on 8 April and discuss the NDP including our submission to the 'call for sites' stage. Having reviewed the representations</p>	<p>Burmarsh is on the settlement hierarchy list within the Core Strategy.</p> <p>Advice received by email on 17.4.15 from the Neighbourhood Planning Team Leader for Herefordshire Council states as follows: "The Core Strategy has given greater flexibility to those parishes with more than one RA2 settlement. The</p>	No change

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					<p>received during the first consultation period earlier this year, we were pleased to see the Steering Group take a proactive approach in reviewing proposals including the site allocations across the Parish.</p> <p>As part of their community consultation on 18 and 19 July, the Parish Council stated that in addition to the two identified site allocations in Marden, an appropriate number of dwellings would be allocated in Litmarsh, Burmarsh and The Vauld, after defining boundaries for each settlement.</p> <p>This approach was broadly supported by parishioners who attended the consultation. The following results from the consultation are noteworthy:</p> <ul style="list-style-type: none"> • 66.6% of attendees agreed with the changes to the NDP policies, which included the site allocation in Burmarsh and corresponding settlement boundary drawn around this site; • 67.5% agreed with the settlement boundary for Burmarsh which included the site allocation at the southern end of Burmarsh; and • 57.6% agreed with the allocation of the site in Burmarsh <p>We were therefore surprised to see a complete change in approach in the second draft NDP (September 2015). There were no longer any</p>	<p>distribution of growth between those settlements is entirely a matter for the neighbourhood plan to determine. Therefore it is not a policy requirement to ensure that some growth provision occurs in all settlements listed within Fig 4.14 and 4.15, your plan can determine the levels of growth between Marden, Burmarsh, Litmarsh and Vauld.”</p> <p>Although the Steering Group recommended in the community consultation that allocations could be made in 2 of the 4.15 settlements, this was one of the main consultation points.</p> <p>Policy M2 in the NDP draft for the Community Consultation did NOT include a site allocation in Burmarsh as the results of the consultation were unknown.</p> <p>The proposed settlement boundary in this draft did not include this site. The site was</p>	

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					<p>site allocations proposed in the villages listed under Figure 4.21. Instead, all housing allocations are directed to Marden village and there is considered to be sufficient capacity on both sites to exceed the required minimum target for development.</p> <p>We do not consider that all housing allocations for the Parish should be directed to Marden village. The Core Strategy modification confirmed that the minimum Parish target for new dwellings has now increased on the basis that it is calculated as a percentage of the total number of houses within the entire Parish. Given this change, it would be logical to consider how dwellings are distributed across the Parish and not just within Marden. Whilst Marden can accommodate the greatest proportion of dwellings, this should not preclude allocating dwellings in other settlements.</p> <p>We do not consider that the proposed approach accords with paragraph 55 of the NPPF which indicates that where there are groups of smaller settlements in rural areas, the development in one location may support services in a location nearby. The NDP approach to directing all housing allocations in Marden would not support development and services in the other settlements.</p>	<p>marked as adjacent to the proposed boundary. Although 67.5% of the consultees agreed with this allocation, the Parish Council considered that due to the constraints highlighted by the consultation it was not appropriate to allocate specific sites in Burmarsh.</p> <p>It is considered that the identification of the settlement boundary and the criteria based policy will guide sufficient development to sustainable areas without allocating sites in the settlements. This approach</p>	

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					<p>With regard to sustainable development, Herefordshire Council's evidence papers have consistently identified Burmarsh as a sustainable settlement. Due to its close proximity to Sutton St Nicholas, we consider that Burmarsh is a relatively sustainable location for development.</p> <p>Furthermore, it should be acknowledged that Burmarsh is listed in the Core Strategy as a smaller settlement in Table 4.21, where proportionate housing is appropriate. The fact that the village is listed in the Core Strategy means that measures should be identified to deliver appropriate levels of housing.</p> <p><u>Development in Burmarsh</u> The key recommendation from the NDP Steering Group in July was that allocating one site in Burmarsh with the potential capacity of 5 dwellings (as noted in the Site Assessment Report for the Call for Sites) would be:</p> <ul style="list-style-type: none"> • Proportionate to the dwellings currently within the proposed settlement boundary • Would not extend the built form to include Fromington or Franklands Corner - which the Steering Group consider are separate from Burmarsh; and • Allows reasonable development in the largest of the three designated hamlets. 	<p>accords with Paragraph 55 of the NPPF.</p> <p>See advice from Neighbourhood Planning Team Leader at Herefordshire Council above.</p>	No change

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					<p>We agree with the Steering Group's statement that an allocation for five dwellings is proportionate to the dwellings within the proposed settlement boundary. Our previous representations identified that Burmarsh would include up to 6 dwellings based on the indicative housing growth target. Such an approach would accord with the modified Policies RA1 and RA2 of the Core Strategy.</p> <p>The Steering Group in the latest consultation draft NDP state that the proposed site allocation was not taken forward following the community consultation. It concluded that no extension of the settlement boundary is suitable, beyond that which is defined in the draft NDP.</p> <p>We fail to see how the Steering Group's previous assertion that the site allocation 'would not extend the built form to include Fromington or Franklands Corner' could be changed to a statement that 'no extension of the Boundary was suitable as Fromington, Hawkers/and Franklands Corner are seen as separate rural hamlets ...'</p> <p>The effect of the settlement boundary as currently drawn is to restrict development in an unsustainable way which would be counter to the objectives of the NPPF.</p>	<p>Community consultation is a cornerstone of the NDP process. Throughout the consultation responses, there is a strong thread that the access at both ends of Burmarsh and the unreliable utility services available should mean that no site is allocated in Burmarsh.</p> <p>Noted and accepted.</p> <p>Settlement boundaries have been identified in accordance with Herefordshire Council's guidance note.</p>	<p>No change</p> <p>No change</p> <p>No change</p>

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					<p>The Council's settlement boundary guidance states: 'The settlement boundary does not necessarily have to cover the full extent of the village nor be limited to its built form.' The guidance adds that: 'The use of settlement boundaries has led to criticism that they result in cramming within the village as every available area of land competes for development resulting in a potential reduction in the landscape quality and character of that village, unless other policies are in place.'</p> <p>Indeed, it is not clear what analysis has been undertaken of infill and/or windfall development opportunities in Burmarsh based on the proposed settlement boundary. Furthermore, it is not clear how this analysis would tie in with the Policy M2 in the draft NDP which states under criterion (c) that proposals for new housing in Burmarsh should not exceed 25 dwellings per hectare in density. Without drawing a suitable settlement boundary for Burmarsh which provides flexibility, there is a risk that the development required through the Core Strategy will not come forward. <u>Proposed Site Allocation</u> The Steering Group also confirm in paragraph 8.18 of the draft NDP that:</p>	<p>It is considered that the identification of the settlement boundaries and the criteria based policy will guide sufficient development to sustainable areas in the parish without allocating sites in the hamlets. Comment relating to density noted and accepted.</p> <p>Noted. Comment was stated during community consultation. Any planning application will</p>	<p>Remove from M2(a) words: <i>or on a windfall site</i></p> <p>Remove from M2(c)) words: <i>and not exceeding 25 dwellings per hectare</i></p>

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					<p>'The proposed site in Burmarsh should not be allocated as the issue of the narrow road and poor unsafe access was highlighted in the consultation; the Steering Group acknowledge that without this allocation, windfall and infill development can and probably will take place and is better suited to the rural nature of Burmarsh; and also the allocated sites in Marden village have the capacity to exceed the required minimum target for development to 2031.'</p> <p>Given the status of Burmarsh as a settlement where proportionate housing growth is appropriate, we do not consider the above statement promotes sustainable development in this village. The highways comment has been made without any assessment of options or measures to mitigate development impacts. Furthermore, it would suggest that no development is suitable in Burmarsh, whereas the statement continues that windfall and infill development can and probably will take place. With none of the submitted sites allocated in the NDP and no further review of the site assessment work previously undertaken, we fail to see how this approach is in accordance with the Core Strategy strategic policies.</p> <p>We do not consider that any of the sites submitted to the NDP Steering Group are</p>	<p>be assessed as and when it is submitted in terms of highway impacts.</p> <p>Noted.</p> <p>Should any of the sites come forward as planning applications, these will be assessed against the relevant policies in the Marden NDP in addition to the Herefordshire Core Strategy.</p>	No change

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					<p>isolated from the existing linear built form of Burmarsh. The Core Strategy adds that residential development will be located within or adjacent to the main built up area(s) of settlements, to ensure that unnecessary isolated, non-characteristic and discordant dwellings do not arise.</p> <p>The site which was proposed for allocation is suitable, available and achievable (being both deliverable and developable) in accordance with the requirements of the NPPF and is therefore extremely well placed to accommodate the delivery of small scale residential development in Burmarsh, in line with the Core Strategy Policies RA1 and RA2. The development of this land, at a scale commensurate with the role and function of the village, would assist in enhancing the sustainability of Burmarsh.</p> <p>Indeed, the development of the land identified would facilitate the delivery of significant benefits which meet the objectives and visions set out on pages 3 and 12 of the Draft NDP and would support the NPPF which states that where there are groups of smaller settlements, development in one village may support services in a village nearby.</p>	Noted.	

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					<p><u>Conclusion</u></p> <p>We appreciate that in line with the Core Strategy, the NDP has appropriate flexibility to apportion the minimum housing requirement between the settlements in Figures 4.20 and 4.21.</p> <p>The Steering Group had taken a proactive approach in identifying a site allocation in Burmarsh which is well related to the settlement and allows for proportionate growth in line with the Core Strategy rural housing policies. The proposed removal of this site together with the tightly drawn settlement boundary would not deliver the proportionate growth directed by the Core Strategy. Furthermore, the approach constrains sustainable growth of an identified Core Strategy settlement through both the non-allocation of small scale sites and the drawing of a settlement boundary. This fails to provide sufficient opportunities for housing development and does not in our view meet the basic conditions.</p> <p>In light of the Inspector's Report and soon to be adopted Herefordshire Core Strategy, the Marden NDP should be reviewed having regard to the strategic aims of the Plan and direction for development provided through Policies RA1 and RA2.</p> <p>We welcome the opportunity to meet with the Steering Group and discuss the points made in</p>		

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					this representation, prior to submitting the plan to Herefordshire Council.		
M14/10/6 Pete Boland, Historic Places Advisor West Midlands, Historic England, The Axis, 10 Holliday Street, Birmingham, B1 1TG				Comment	<p>Thank you for the invitation to comment on the above Neighbourhood Plan. Overall Historic England considers the Plan to be a well-considered, concise and fit for purpose document. We do not wish to add to the comments made in respect of the earlier Regulation 14 consultation other than to note with thanks the inclusion in this latest iteration of the Plan of a minor amendment as previously suggested by ourselves.</p> <p>I hope you find this advice helpful. If you have any queries please do not hesitate to contact me.</p>	Noted and welcomed.	No change
M14/10/7 Planning Policy Herefordshire Council				Comment	There are a number of policies within the plan that whilst fully in conformity with the Core Strategy, are largely already covered by the equivalent Core Strategy policies, meaning they could be seen as repetitive. They would perhaps benefit from taking the opportunity, where possible, to give them a more localised flavour- for instance, more like M10, which identifies specific green spaces of local value for protection.	Noted. The Parish Council consider that the policies within the Marden NDP do have a more localised flavour.	No change
M14/10/7 Planning Policy Herefordshire Council			M1	Comment	What is the basis for the maximum density of 25 dwellings per hectare? Could prove restrictive to delivery.	The density is based on that of the existing village (currently 17 per hectare), to ensure development is in keeping with its surroundings. High density	No change

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						development would be unsuitable and out of character with the village. This will not restrict delivery as outline planning permission granted for dwellings in excess of minimum target.	
M14/10/7 Planning Policy Herefordshire Council			M2	Comment	What is the basis for the maximum density of 25 dwellings per hectare? Could prove restrictive to delivery.	The density is based on that of the hamlets, to ensure development is proportionate to surroundings. Higher density development would be unsuitable, and out of character with the hamlets. Large sites are unlikely to come forward in the named hamlets.	Remove from M2(c)) words: <i>and not exceeding 25 dwellings per hectare</i>
M14/10/7 Planning Policy Herefordshire Council		8.42	M10	Comment	Correct reference to Policy DR1- from the Unitary Development Plan not the Emerging Core Strategy.	References to UDP removed when Core Strategy adopted.	Change
M14/10/8 Neighbourhood Planning Herefordshire Council		5.3/ 5.4		Comment	Text needs to be updated to reflect the current statutory planning documents.	References updated when Core Strategy adopted.	Change
M14/10/8 Neighbourhood Planning Herefordshire Council		8.3		Comment	Update text to reflect updated status of the Core Strategy	References updated when Core Strategy adopted.	Change

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M14/10/8 Neighbourhood Planning Herefordshire Council		8.5/ 8.10/ 8.21/ 8.23/ 8.30/ 8.37		Comment	Update/delete references to the UDP policies	References updated when Core Strategy adopted.	Change
M14/10/8 Neighbourhood Planning Herefordshire Council			M7/ M8	Comment	Similar reference to safeguarding the River Wye SAC here may be appropriate	Noted and accepted.	Add extra point to both policies: <i>Ensure/s that any likely significant effect on the River Wye Special Area of Conservation (SAC) is avoided or adequately mitigated.</i>
M14/10/8 Neighbourhood Planning Herefordshire Council			M13	Comment	'All new proposals' would include everything – single house proposals.	Noted and accepted.	Change to: <i>All new proposals for additional dwellings should</i>
M14/10/8 Neighbourhood Planning Herefordshire Council				Comment	Inserting the maps in the appropriate places within the text would benefit the legibility of the plan particularly for development management purposes.	Noted and accepted.	Maps inserted as required in text
M14/10/8 Environmental Health,				Comment	Having reviewed records readily available, I would advise that the two areas of land (sites 11 &13) as identified in the key as "Land allocated for future residential development"	Noted. M4 (g) added to text following previous Regulation 14 response.	No change

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Herefordshire Council					<p>(indicated in orange on the map) in Appendix 10 - Map of Allocated Sites – with amended settlement boundary, appear from a review of Ordnance survey historical plans to have historically been 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.</p> <p>General comments: Developments such as hospitals, homes and schools may be considered ‘sensitive’ and as such consideration should be given to risk from contamination notwithstanding any comments. Please note that the above does not constitute a detailed investigation or desk study to consider risk from contamination. Should any information about the former uses of the proposed development areas be available I would recommend they be submitted for consideration as they may change the comments provided.</p> <p>Finally it should be recognised that contamination is a material planning consideration and is referred to within the NPPF. I would recommend applicants and those involved in the parish plan refer to the pertinent parts of the NPPF and be familiar with the requirements and meanings given</p>		

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					when considering risk from contamination during development. These comments are provided on the basis that any other developments would be subject to application through the normal planning process.		
M14/10/10 Aspbury Planning Ltd, 20 Park Lane Business Centre, Park Lane, Basford, Nottingham, NG6 0DW				Comment	<p>We are instructed by our Client, S&A Produce (UK) Limited to write to you making representations on behalf of the Company on the Draft Neighbourhood Plan.</p> <p>Summary of Representations The Company proposes that the Draft Plan be amended to include an (additional) housing allocation {approximately 75 family homes) on the land between Brook Farm and properties fronting Walkers Green and to the rear of the Volunteer Inn PH, Marden, as delineated on the attached Ordnance Survey Plan (the 'Omission Site').</p> <p>Background to Representations As the Parish Council is no doubt aware, S & A Group is one of the leading growers and suppliers of soft fruit and other produce to the retail market in the UK and one of the biggest enterprises and largest employers in Herefordshire. The Company's main operational site for growing, packing and administration is at Brook Farm, Marden.</p>	<p>Noted.</p> <p>The 'Omission Site' refers to sites 15 and 16 submitted to the 'Call for Sites' Process in 2014 (shown in appendix 7 of the September 2015 Regulation 14 version of the Draft Plan) with some amendments. The front parts of sites 15 & 16 as identified in appendix 8 of the September 2015 Regulation 14 Draft, for 16 houses in total, were ranked by parishioners during the Community Consultation event in January 2015. The sites were ranked 3 and 4 out of 5 sites. Many negative comments were received relating to roads and traffic issues for both these sites and</p>	No change

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					<p>The existing operational activities and development at Brook Farm, either constitute (long) established lawful development, or, are undertaken in accordance with a range of explicit planning permissions, the most important of which - for the erection of (Spanish) polytunnels (over soft fruit crops) and for the use of land for seasonal agricultural workers' accommodation- are the subject of separate planning permissions granted in 2009 and 2010.</p> <p>The original temporary (10 years) planning permission for polytunnels was made permanent by a further permission granted in July of this year.</p> <p>The soft fruit market is dynamic and continues to evolve and the Company is naturally obliged to respond to constantly changing commercial conditions and the business environment in which it operates.</p> <p>There have been number of significant changes that have impacted on the seasonal agricultural workforce in particular in recent years. These changes are all, to some extent, inter-related and/or have had significant causal impacts on each other. They include:</p> <ul style="list-style-type: none"> • A progressive lengthening of the UK soft fruit growing season and a more even 	<p>the site opposite Brook Farm (recently refused planning permission) because of the high level of HGV and other traffic using the narrow road, much of it due to S&A. In addition many parishioners stated they did not want any development on these sites.</p> <p>Therefore neither site 15 or 16 were considered suitable for allocation.</p> <p>Noted. Not an issue for the NDP to address.</p>	<p>No change</p> <p>No change</p>

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					<p>production over that season with fewer peaks and troughs;</p> <ul style="list-style-type: none"> • The ending of the Home Office's Seasonal Agricultural Workers' Scheme and a requirement henceforth to recruit workers from within the EU only. In this context the changes to the status of Bulgarian and Romanian Nationals from January 2014, whereby they have full rights of movement and employment throughout the EU, will impact increasingly on the ability of S&A and similar businesses across both Herefordshire and the rest of the UK to recruit the number of seasonal workers needed to support its operations; • A progressive change in the demographic profile of seasonal workers, with fewer young single people and an increasing number of older workers and of couples/adult family groups; • A move away from the employment of 'students' and other young people seeking ad hoc 'vacation' work over one or two seasons, in favour of a more stable, regular, skilled and/or experienced agricultural workforce, travelling from their home country regularly, year-on-year, or even remaining resident in the UK year round and undertaking other casual work out-of-season; 		

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					<ul style="list-style-type: none"> • A broadening of the range of work undertaken by seasonal workers, beyond simply in season fruit picking and packing; • Competition for the available workforce pool from other agricultural and non-agricultural enterprises within the UK and elsewhere in Europe; • Changing expectations amongst the workforce with regard to pay, working and living conditions; • The increasing adoption of ethical trading policies by customers and their suppliers that set minimum standards, including in relation to their workforce and the terms and conditions under which they are employed and, where relevant, housed; • Increasingly stringent regulatory (e.g. health and safety) and insurance obligations relating to the existing accommodation. <p>In a materially more competitive labour market for Seasonal Agricultural Workers (SAWs) the quality of accommodation provided will be instrumental in the Company's ability to recruit enough SAWs. At the same time the current stock of caravans at S&A to house SAWs is ageing and in need of replacing with something which is more appropriate.</p> <p>In the light of the above and the need to continue to be a competitive business, S&A</p>	Not an issue for the NDP to address.	No change

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					<p>Group has concluded that the existing SAWA site and the accommodation and facilities that it provides will become ever less fit for purpose as time passes.</p> <p>Rather than seek to replace the existing caravans and pods with other forms of temporary and mobile/demountable accommodation, the Company wishes to embark on a phased programme of developing high-quality permanent accommodation</p> <p>In this context S&A intends to seek to develop permanent built accommodation on the existing SAWs accommodation site which will comprise 85 'communal living' (private bedrooms, but shared kitchen, bath- and sitting/dining rooms) units that can accommodate up to 16 people in each. The area affected- the majority of the existing SAW's accommodation site - is also shown on the attached Ordnance Survey Plan. In order to ensure continuity of available accommodation, the redevelopment scheme would be undertaken in phases, probably over 3-5 years.</p> <p>As the recent correspondence (6 October) from Trevor Gregory, the Company's Finance Director, to you confirms, we are in the process of formulating a full planning</p>	<p>The provision of temporary SAW accommodation is not an issue for the NDP.</p> <p>This Neighbourhood Development Plan cannot comment on the proposed planning applications. This will</p>	<p>No change</p> <p>No change</p>

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					<p>application for this development, which, it is anticipated, will be submitted to Herefordshire Council before the end of the year.</p> <p>Two issues arise from this proposal which have informed these representations on the draft Neighbourhood Plan.</p> <p>The first is the capital cost to the Company of implementing the new SAW's accommodation scheme which will be very large. Even on a phased basis, such a large and costly development cannot be funded from the Company's normal cash flow and/or borrowings, as will be demonstrated through evidence submitted with the Planning Application in due course. At least part of the funding needs to come from a disposal of assets in the form of the sale for development of the Company's non-operational land to the south of Brook Farm. In order to secure a logical and comprehensive scheme, however, any development should include the land outside the Company's ownership to the rear of the Volunteer Inn and the properties fronting Walker's Green, which is presently landlocked.</p> <p>Secondly, and notwithstanding the financial imperative, the Company considers that, in any event, the land in question represents a logical</p>	<p>be a matter for the Parish Council and community in due course.</p> <p>The provision of temporary SAW accommodation is not an issue for the NDP.</p> <p>Financial issues are not matters related to planning. The front parts of sites 15 & 16 as identified in appendix 8 of the September 2015 Regulation 14 Draft, for 16 houses in total, were ranked by parishioners during the Community Consultation event in January 2015. The sites were ranked 3 and 4 out of 5 sites. Many negative comments were received relating to roads and traffic issues for both these sites and the site opposite Brook Farm (recently refused planning permission) because of the</p>	No change

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					<p>candidate for housing development by virtue of its landscape context. Thus, it constitutes a strongly visually-contained space on the edge of the Village, whereon housing development would be neither prominent nor intrusive and would not extend the village into open countryside but would, rather, constitute 'rounding off within strong and defensible long terms boundaries. Thus the extensive Brook Farm operational complex provides effective containment and an obvious barrier to any further outward expansion/ sprawl of development on the candidate site. That containment will be considerably reinforced by the development of permanent SAW accommodation on the land immediately to the north.</p> <p>In this sense the candidate site allocation we are promoting contrasts markedly with the 'allocation' to the south east of the Village proposed in the draft Neighbourhood plan and with the proposed development opposite Brook Farm that was the subject of a recent planning application and refusal of permission.</p> <p>Whilst, the Company raises no objection to the former site (or indeed to the site to the west of the Village), both it and the proposal opposite Brook Farm would involve a prominent extension of the built up area of the Village into</p>	<p>high level of HGV and other traffic using the narrow road, much of it due to S&A. In addition many parishioners stated they did not want any development on these sites.</p> <p>SAW accommodation is not an issue for the NDP.</p> <p>The Parish Council considers that the site allocated to the south east of the village provides cohesion as it is adjacent or close to the school, the shop and post office and the current community centre.</p>	No change

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					<p>open countryside in an area lacking both landscape and visual containment and long-terms and 'defensible' natural or man-made physical boundaries. Thus in landscape and visual terms our Client's proposal is demonstrably superior to available alternatives in landscape and visual impact terms.</p> <p>The proposed development would be for conventional family housing comprising both open market and a ('policy compliant') level of affordable housing.</p> <p>Because of the evident close interrelationship of both the SAW's accommodation and the family housing scheme it is proposed to submit a separate application for outline planning permission (with all matters reserved except means of access) for the latter simultaneously with the full application for the former. A single integrated masterplan will demonstrate the relationship of both proposals.</p> <p>It is intended that the proposed SAWs accommodation and the general purpose housing site would share a new vehicular access to the public highway. This access has been designed to the requisite technical standards and this detailed design will form part of both application proposals.</p>	<p>Consultation with the community on any application in this area has highlighted significant concerns about roads, traffic and noise. Any access will be onto a narrow road with severe problems currently due to HGV traffic as identified in the previous planning refusal for land opposite Brook Farm.</p>	No change

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					<p>The Applications will be accompanied by a full suite of supporting technical documents including: the aforementioned Masterplan; a Spatial Planning Statement; a Design and Access Statement; a Transport Statement; a Flood Risk and Drainage Assessment; a Landscape and Visual Impact Assessment; and a Business Case/Viability Assessment. These documents will demonstrate that there are no technical or site-specific constraints upon development of the Omission Site and that such development would not cause demonstrable harm to any interest of acknowledged importance.</p> <p>The Company will be undertaking pre-application consultation with the local community at an event on 29 October and also with the Parish Council on a date yet to be agreed but at about the same time.</p> <p>There is no intention to pre-empt or predetermine the outcome of the Neighbourhood Plan process by the submission of the Applications now. The timetable is essentially driven principally by the Company's pressing operational and commercial requirements, and, in any event, it is anticipated that the determination of the Applications will to some extent run in parallel with the Neighbourhood Planning Process. The</p>	<p>Planning application process is separate to NDP process.</p> <p>The Parish Council is pleased to note there are no intentions to pre-empt or predetermine the outcome of the Neighbourhood Development Plan process by the submission of the Applications now.</p>	No change

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					<p>Framework makes clear that proposals for sustainable development, which the Applications in question would certainly represent, need not await the full completion of the plan-making process. In this respect we consider the Herefordshire Local Plan Core Strategy (LPCS) has now reached a stage and is in a form which establishes that there is no conflict between its provisions and our Client's proposals (see below). Furthermore, the submission of the Applications in question now merely places the candidate Site on the same procedural footing as the site to the south east of the Village which is also the subject of a current planning application.</p> <p>As noted above, the Company does not promote the Site in question necessarily as an alternative to the currently preferred 'allocations' in the draft Neighbourhood Plan, although we consider that it is, on its spatial planning merits, demonstrably superior to those sites.</p> <p>In our submission the allocation and commitment through planning permissions of all three sites would still be consistent with the spatial strategy set out in the emerging Core Strategy, having regard to the fact that Marden is identified as a sustainable rural settlement capable of accepting a significant level of</p>	<p>The sites in the draft NDP will fulfil and greatly exceed the minimum number of dwellings required in Marden parish to ensure positive growth in the Parish and also that the Plan is</p>	No change

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					<p>new housing development and that the growth target for identified settlements, including Marden, set out in the LPCS is a minimum not a maximum or ceiling figure. The Company is also mindful that Herefordshire Council cannot currently demonstrate a 5-year housing land supply and on that basis that Council's Officers were prepared to recommend a grant of planning permission for the site opposite Brook Farm even though it is not identified for allocation in the draft Neighbourhood Plan.</p> <p>In all the circumstances we invite the Neighbourhood Plan Steering Group and the Parish Council to accept our representations and to amend the draft Neighbourhood Plan accordingly to include the Omission Site within the proposed Settlement Boundary and to allocate it for housing development.</p>	<p>in general conformity with the Core Strategy. Further development would be disproportionate and inappropriate for the rural and unique nature of the village and parish.</p> <p>The Parish Council is pleased to note there are no intentions to pre-empt or predetermine the outcome of the Neighbourhood Development Plan process by the submission of the Applications now and it does not seek to amend the NDP to include this site.</p>	
M14/10/11 Mr Ian Griffiths & Mrs Nicola Griffiths-Rose, 23 Walkers Green, Marden				Comment	<p>We are somewhat disillusioned with this whole process as we feel sites for development were earmarked before the "Call for Sites" was even made. We attended the meetings and found the maps to be flawed which we pointed out to members of the committee at the time. We filled in the questionnaires as requested and expressed our opinions. We both left feeling</p>	<p>Noted.</p> <p>Other small sites can come forward as windfall providing they are in accordance with the Policies of the Marden NDP and the Herefordshire Core Strategy.</p>	No change

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					<p>the sites where already chosen and villagers were being somewhat led to support the 2 favoured sites whether intentional or not. Having spoken to neighbours about it they too felt this was the case. As expected those sites have indeed now been put forward as the favoured sites. What would have had a lesser impact would have been to have more than 2 recommended sites. This would have spread out the development. What is going to happen now is going to be akin to a satellite village almost like an annexe adjoining the main village.</p> <p>Having enjoyed living in the village for over 20 years our biggest fear is over development. We fully accept that ongoing development is necessary but a massive influx in the population that 90 houses will bring is bound to have a fundamental change to the atmosphere of the village, probably not for the better. The site at New house farm must be restricted significantly downwards from the 90 that was originally applied for. There are currently numerous properties around the village that have been for sale for a prolonged period so why the need for some many more, to remain unsold.</p> <p>We appreciate members of the committee have put a lot of work and given their own time</p>	<p>At the Community Consultation event, the Steering Group did not make any recommendations, but put forward 5 sites for consideration and ranking. The results of this ranking are as follows, with the total score (lowest number denotes the most preferred site):</p> <ol style="list-style-type: none"> 1. Site 11 (Land by New House Farm) – total score 436 2. Site 13 (Rose Villa) – total score 488 3. Site 15 (Campsite by The Volunteer) – total score 603 4. Site 16 (S&A site) – total score 640 5. Site 17 (Land opposite Brook Farm) – total score 642. <p>The Neighbourhood Plan seeks to address proportionate and appropriate growth throughout the Parish. The Parish Council considers that the allocations policies put forward and the criteria based policies will achieve this in a sustainable way.</p>	

Consultee Name Address Ref. No.	Page No.	Para. No.	Policy No.	Support / Object / Comment	Comments received	Parish Council Comments	Amendments to NP
					preparing the report and we thank them. If they can achieve one thing for the whole community now it would be to protect the village from over development or at least integrate development into the village rather than have it all in large, almost independent sections. We do not want to lose exactly what makes Marden such a lovely place to live.	Noted and welcomed.	
M14/10/12 Stephanie Jones, Sustainable Development – South Mercia, Natural England, Hornbeam House, Crewe Business Park, Electra Way, Crewe, CW1 6GJ				Comment	<p>Thank you for your consultation dated and received by Natural England on 03 September 2015.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>THE CONSERVATION OF HABITATS AND SPECIES REGULATIONS 2010 (AS AMENDED) (HABITATS REGULATIONS) WILDLIFE AND COUNTRYSIDE ACT 1981 (AS AMENDED)</p> <p>Natural England has previously commented on this proposal and made comments to the authority in our letter dated 19 March 2015 Habitats Regulations Assessment (HRA) and NDP Policy Updates</p>	Noted and welcomed.	No change
M14/10/12 Stephanie Jones, Sustainable				Comment	We note the amendments made to policies M1, M2 & M3 in relation to ensuring a sufficient approach to avoid adverse impacts on the River Wye SAC and are satisfied that these	Noted and welcomed.	No change

Consultee Name Address Ref. No.	Page No.	Para. No.	Policy No.	Support / Object / Comment	Comments received	Parish Council Comments	Amendments to NP
Development – South Mercia, Natural England, Hornbeam House, Crewe Business Park, Electra Way, Crewe, CW1 6GJ					evidence an alignment with the Herefordshire Local Plan process and discussion on strengthening the NDP to demonstrate that there will be no likely significant effects on the SAC.		
M14/10/12 Stephanie Jones, South Mercia, Natural England, Hornbeam House, Electra Way, Crewe, CW1 6GJ				Comment	Policy M10 – Protection of Local Green Spaces The advice provided in our previous response applies equally to this amendment although we made supportive comments in our original response.	Noted and accepted.	Add extra point to M10: <i>New development must ensure that any likely significant effect on the River Wye Special Area of Conservation (SAC) is avoided or adequately mitigated.</i>
M14/10/12 Stephanie Jones, South Mercia, Natural England, Hornbeam House, Electra Way, Crewe, CW1 6GJ				Comment	Green infrastructure/ Policy M12 – Surface Water Run-off The advice provided in our previous response still applies to this policy. Natural England acknowledges the amendments made in light of our original comments.	Noted and accepted.	Add extra point to M12: <i>New development must ensure that any likely significant effect on the River Wye Special Area of Conservation (SAC)</i>

Consultee Name Address Ref. No.	Page No.	Para. No.	Policy No.	Support / Object / Comment	Comments received	Parish Council Comments	Amendments to NP
							<i>is avoided or adequately mitigated.</i>
M14/10/13 Mr Graeme Irwin, Environment Agency, Hafren House, Welshpool Road, Shelton, Shropshire SY3 8BB				Comment	<p>I refer to your email of the 8 September in relation to the above Neighbourhood Plan (NP) consultation. We have reviewed the submitted document and would offer the following comments at this time.</p> <p>As previously stated, in relation to matters within our remit, Herefordshire Council Core Strategy have updated their Strategic Flood Risk Assessment (SFRA) and Water Cycle Strategy (WCS) documents. This evidence base ensured that the proposed development in Hereford City, and other strategic sites (Market Towns), was viable and achievable. The updated evidence base did not extend to Rural Parishes at the NP level so it is important that these subsequent plans offer robust confirmation that development is not impacted by flooding and that there is sufficient waste water infrastructure in place to accommodate growth for the duration of the plan period. We commented upon the previous iteration of Marden plan (March 2015) and we note that the current submission has been amended in consideration of our comments.</p>		
M14/10/13 Mr Graeme Irwin,			M12		Whilst we welcome the aspiration of Policy M12, stating that all new residential development is to be located within Flood Zones 1 or 2 does not accord with National	Noted and accepted.	First section of Policy M12 be amended to read as follows:

Consultee Name Address Ref. No.	Page No.	Para. No.	Policy No.	Support / Object / Comment	Comments received	Parish Council Comments	Amendments to NP
Environment Agency, Hafren House, Welshpool Road, Shelton, Shropshire SY3 8BB					<p>Planning Policy Guidance (and reference to the Sequential Approach to flood risk) or Herefordshire Councils Core Strategy (Policy SD3 – Sustainable Water Management). Development should only be located within Flood Zone 2 (Medium Risk) if it has been demonstrated that there are no alternative sites within Flood Zone 1 (Low Risk). The Policy wording would also indicate that all built development other than residential is acceptable within Flood Zone 3 (High Risk). We would recommend that the first point of Policy M12 is re-worded, and expanded upon, as such:</p> <p>“All development should be located within Flood Zone 1 (Low Risk) and accord with National Planning Policy Guidance (NPPG) and Herefordshire Council’s Core Strategy (Policy SD3 - Sustainable Water Management). Where development is deemed acceptable within Flood Zones 2 and 3 (in accordance with the Sequential Test) we would expect proposals to demonstrate that they are safe and will not increase flood risk to third parties, with flood-risk betterment provided where possible.”</p> <p>The above seeks to ensure that all built development is located within Flood Zone 1 but that, in accordance with the NPPG and</p>		<p><i>All development should be located within Flood Zone 1 (Low Risk) and accord with National Planning Policy Guidance (NPPG) and Herefordshire Council’s Core Strategy (Policy SD3 - Sustainable Water Management). Where development is deemed acceptable within Flood Zones 2 and 3 (in accordance with the Sequential Test) we would expect proposals to demonstrate that they are safe and will not increase flood risk to third parties, with flood-risk betterment provided where possible.</i></p>

Consultee Name Address Ref. No.	Page No.	Para. No.	Policy No.	Support / Object / Comment	Comments received	Parish Council Comments	Amendments to NP
					Herefordshire Councils own flood risk Policy, where it is sequentially demonstrated that such development has to be within Flood Zones 2 or 3, any proposals will be safe and not increase flood risk.		
M14/10/13 Mr Graeme Irwin, Environment Agency, Hafren House, Welshpool Road, Shelton, Shropshire SY3 8BB				Comment	Foul Water Drainage: With regards to foul drainage infrastructure we would re-iterate our previous comments, in that all new development throughout the Plan area should be assessed against the capacity of local infrastructure. In this instance we would expect consultation with Welsh Water to ensure that the scale of development can be accommodated. As you are aware, as part of the WSC update/addendum, an assessment of Sewage Treatment Works within the County was undertaken with data collated by both Welsh Water and ourselves. The Plan should make reference to this information to provide re-assurance that there is adequate foul infrastructure to accommodate growth throughout the plan period. Whilst, due to the limited scale of development proposed, this is unlikely to cause problems clarification should be sought and provided in any future revisions to the Plan. Specific to the Marden Parish, and the limited scale of potential development, this is unlikely to cause problems but clarification should be sought and provided in any future revisions to the Plan.	Noted and accepted.	Insert additional paragraph in Section 6 – Key issues for Marden as follows: <i>Herefordshire Council has updated its Core Strategy to include their Strategic Flood Risk Assessment (SFRA) and Water Cycle Strategy (WCS) documents. This evidence base ensured that the proposed development in Hereford City, and other strategic sites (Market Towns), was viable and achievable. The updated evidence base did not extend to Rural Parishes at</i>

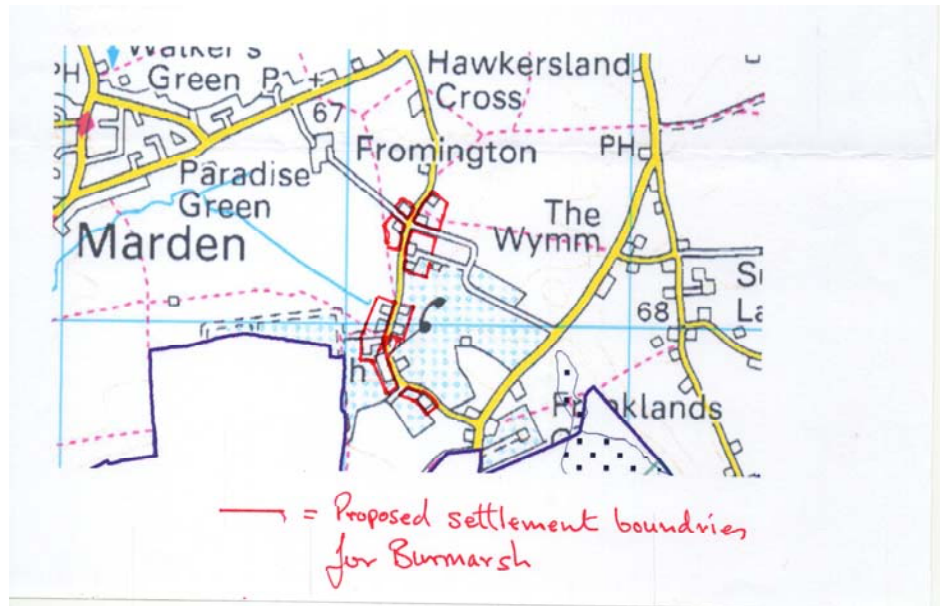
Consultee Name Address Ref. No.	Page No.	Para. No.	Policy No.	Support / Object / Comment	Comments received	Parish Council Comments	Amendments to NP
							<p><i>the NDP level so it is important that these subsequent plans offer robust confirmation that development is not impacted by flooding and that there is sufficient waste water infrastructure in place to accommodate growth for the duration of the plan period.</i></p> <p><i>With regards to foul drainage infrastructure, in consultation with Welsh Water, all new development throughout the Plan area should be assessed against the capacity of local infrastructure to ensure that the scale of development can be accommodated.</i></p>

Consultee Name Address Ref. No.	Page No.	Para. No.	Policy No.	Support / Object / Comment	Comments received	Parish Council Comments	Amendments to NP
M14/10/14 Lisa Bullock, Town Planner (Western and Wales), 3rd Floor, Temple Point Redcliffe Way, Bristol BS1 6NL				Comment	<p>I am very sorry this response is late and hope that it's not too late to be included. Network Rail has been consulted by Marden Parish Council, on the draft of the Neighbourhood Development Plan. Thank you for providing us with this opportunity to comment on this Planning Policy document. This email forms the basis of our response to this consultation request. Network Rail is a statutory undertaker responsible for maintaining and operating the country's railway infrastructure and associated estate. Network Rail owns, operates, maintains and develops the main rail network. This includes the railway tracks, stations, signalling systems, bridges, tunnels, level crossings and viaducts. The preparation of development plan policy is important in relation to the protection and enhancement of Network Rail's infrastructure.</p> <p>Level Crossing Safety Development proposals' affecting the safety of level crossings is an extremely important consideration for emerging planning policy to address. The impact from future development can result in a significant increase in the vehicular and/or pedestrian traffic utilising a crossing which in turn impacts upon safety and service provision.</p>	<p>Noted.</p> <p>Noted and accepted.</p>	<p>No change</p> <p>Insert additional criteria in M1 as follows:</p> <p><i>(j) Where a Transport Assessment is submitted in support of a planning application, this</i></p>

Consultee Name Address Ref. No.	Page No.	Para. No.	Policy No.	Support / Object / Comment	Comments received	Parish Council Comments	Amendments to NP
					<p>As a result of increased patronage, Network Rail could be forced to reduce train line speed in direct correlation to the increase in vehicular and pedestrian traffic using a crossing. This would have severe consequences for the timetabling of trains and would also effectively frustrate any future train service improvements. This would be in direct conflict with strategic and government aims of improving rail services. Therefore the location of proposed new development is an important consideration for Network Rail and should form part of any initial appraisal of future development sites.</p> <p>Network Rail is a publicly funded organisation with a regulated remit it would not be reasonable to require Network Rail to fund rail improvements necessitated by commercial development. It is therefore appropriate to require developer contributions to fund such improvements.</p> <p>The likely impact and level of improvements required will be specific to each station and each development meaning standard charges and formulae may not be appropriate. Therefore in order to fully assess the potential impacts, and the level of developer contribution required, it is essential that where a Transport Assessment is submitted in support of a planning application</p>		<i>quantifies in detail the likely impact on the rail network.</i>

Consultee Name Address Ref. No.	Page No.	Para. No.	Policy No.	Support / Object / Comment	Comments received	Parish Council Comments	Amendments to NP
					<p>that this quantifies in detail the likely impact on the rail network.</p> <p>To ensure that developer contributions can deliver appropriate improvements to the rail network we would recommend that Developer Contributions should include provisions for rail.</p> <p>We therefore ask that the council should consider the following:</p> <ul style="list-style-type: none"> ▪ A requirement for development contributions to deliver improvements to the rail network where appropriate. ▪ A requirement for Transport Assessments to take cognisance of impacts to existing rail infrastructure to allow any necessary developer contributions towards rail to be calculated. ▪ A commitment to consult Network Rail where development may impact on the rail network and may require rail infrastructure improvements. In order to be reasonable these improvements would be restricted to a local level and would be necessary to make the development acceptable. We would not seek contributions towards major enhancement projects which are already programmed as part of Network Rail's remit. 	<p>Noted. Strategic issue for Herefordshire Council.</p> <p>Noted and accepted.</p> <p>Note. Strategic issue for Herefordshire Council.</p>	<p>No change</p> <p>See additional criteria above M1 (j)</p> <p>No change</p>

M14/10/3 – Map referred to in response above



M14/10/10 – Map referred to in response above

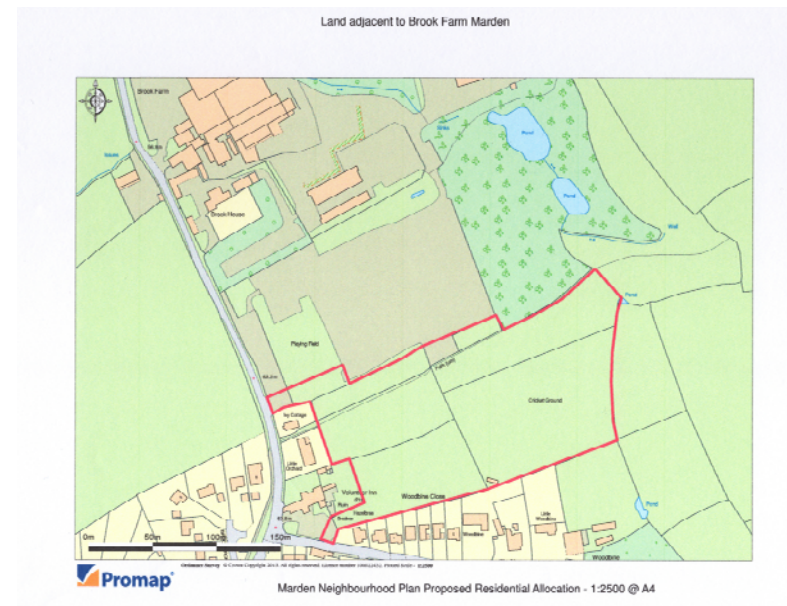


Table 3 Responses from the Consultation Bodies to the SEA/HRA Screening Report (Herefordshire Council)

Consultation Body	Response
Historic England	<p>Thank you for your e-mails and the invitation to comment on the SEA Scoping Reports for the Neighbourhood Plans listed above. We have no substantive objection to the contents of the documents. However, having considered the above Neighbourhood Plans please note that our comments and recommendations to you in relation to these remain substantively the same as those which we communicated to you in our letter of the 15th August 2014 in response to the first tranche of SEA Scoping Reports. We urge you to refer back to and consider these representations before finalizing the reports in relation to the above Neighbourhood Plans also.</p>
Natural England	<p>We welcome the production of this SEA Scoping report. The following comments are intended to further improve the SEA and its usefulness in assessing the Neighbourhood Plan.</p> <p>Appendix A1 – Plans, policies and programmes Natural England approves of the plans, policies and programmes listed.</p> <p>Appendix A2 – Baseline information for Marden Parish Biodiversity, flora and fauna Under the indicator “Net change in condition of SSSIs”, we welcome the inclusion of data on SSSI’s within this neighbourhood plan area. Under the proposed indicator “Changes to protected habitats and impacts of species within the Herefordshire Local Biodiversity Action Plan”, Magic, Defra’s GIS package for environmental assets (www.natureonthemap.naturalengland.org.uk), could be referred to as a data source. Herefordshire Council’s Annual Monitoring Report has been referred to in other SEA’s.</p> <p>Baseline information on the landscape and open spaces needs to be included under SA objective 15: “Value, protect, enhance and restore the landscape quality of Herefordshire, including its rural areas and open spaces”. Reference could be made to the county Landscape Character Assessment.</p> <p>Water, air, soil and material assets This section (or suitable alternative) should include information on geodiversity (see NPPF paragraphs 113 & 117). The baseline and assessment should make reference to geological conservation and the need to conserve, interpret and manage geological sites and features, both in the wider environment and in relation to designated features. The Herefordshire & Worcestershire Earth Heritage Trust may be of assistance.</p>

	<p>We welcome the inclusion of information on Agricultural Land Classification data against the indicator “Agricultural land usage by quality”, as per our previous recommendations in response to other neighbourhood plan SEA Scoping reports.</p> <p>Soil</p> <p>We note that the best and most versatile agricultural land has not been considered here (although it has been as per above). We suggest including an indicator to monitor the hectares of the best and most versatile agricultural land lost to development.</p> <p>Appendix A3 – Environmental issues identified from Marden Parish baseline</p> <p>We welcome the recognition that development can be a pressure on biodiversity and the inclusion of landscape and soils as environmental issues, as per our previous recommendations in response to other neighbourhood plan SEA Scoping reports.</p> <p>Appendix A4 – SEA Framework</p> <p>We welcome the incorporation of some of the recommendations which we have previously made in response to other neighbourhood plan SEA Scoping Report consultations in the county. Under the SEA topic “Air”, not all of the sub-objectives/indicators are relevant, i.e. water quality, soil and contaminated land are covered. Under the SEA topic “Biodiversity, flora and fauna” and the SEA objective “Value, protect, enhance and restore the landscape quality of Herefordshire, including its rural areas and open spaces”, landscape quality and open spaces have not been covered in the indicators. Relevant indicators should be added, or will not be possible to monitor the impacts of the plan on the landscape and open space. Reference could be made to the county Landscape Character Assessment and Landscape Characterisation studies including Historic Landscape Characterisation if this has been carried out. Applications resulting in the loss of open space could be monitored. We note that no targets have been identified against the indicator “After use of mineral sites especially wildlife habitat creation”; we suggest that perhaps the percentage of opportunities taken could be monitored.</p> <p>We would also welcome the inclusion of an indicator/target around the impact/benefit to ecological networks (NPPF paragraph 109, 113 and 117).</p> <p>Under SEA topic “material assets”, there are no targets identified against the indicator “monitoring changes to the historic landscape”. We suggest that the LPA could monitor the number of applications permitted despite a significant impact on the landscape having been identified.</p> <p>Under the SEA topic “Soil”, we note that the best and most versatile agricultural land has not been considered. We suggest including an indicator to monitor the hectares of the best and most versatile agricultural land lost to development.</p>
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	<p>Habitats Regulations Assessment Screening</p> <p>Where a Neighbourhood Plan could potentially lead to significant environmental effects it will be necessary to screen the Plan in relation to the Habitats and Species Regulations (2010), as amended (the 'Habitats Regulations'). One of the basic conditions that will be tested at Examination is whether the making of the plan is compatible with European obligations and this includes requirements relating to the Habitats Directive. In relation to the Habitats Regulations, a Neighbourhood Plan cannot progress if the likelihood of significant effects on any European Site, either alone (or in combination with other plans and projects) cannot be ruled out) (see Schedule 2, The Neighbourhood Planning (General) Regulations 2012). Therefore measures may need to be incorporated into the Neighbourhood Plan to ensure that any likely significant effects are avoided in order to secure compliance with the Regulations. A screening exercise should be undertaken if there is any doubt about the possible effects of the Plan on European protected sites. This will be particularly important if a Neighbourhood Plan is to progress before a Local Plan has been adopted and/or the Neighbourhood Plan proposes development which has not be assessed and/or included in the Habitats Regulations Assessment for the Local Plan.</p> <p>We note the recommendation that a full Habitat Regulations Assessment Screening is undertaken due to proximity to the River Wye Special Area of Conservation (SAC).</p>
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Appendix I – Questionnaire Analysis March 2014



Marden Parish Council

*** THIS IS A SECOND REQUEST AND YOUR VIEWS ARE NEEDED ***

Production of a Marden Neighbourhood Development Plan



"Do you care about the future of Marden? Many people have seen the furore in the Hereford Times over the grant of planning consent for 150 houses at Kingstone. All communities are open to this at the moment as there is not a countywide plan in force that deals with the demand for housing and other land use over the coming years.

While the County Council is well on the way to producing a plan which will go to public enquiry this year, planning legislation now means that if Marden doesn't have a plan of its own, then as a parish we will have much less say than we might have otherwise have in planning applications.

Therefore, if people are concerned about the way that Marden may develop over the next 15 to 20 years, then you really need to fill in this questionnaire. If you don't care, then fine, chuck it in the bin! Out of the 52 replies we received

from our last request, there isn't really enough feedback to give an indication of interest to start developing a plan, the cost of which for the Parish Council, and therefore probably to the parishioners in the end, will be well into five figures. This is your chance. Fill in the questionnaire and drop it into 6 Brook Orchard or to the box at the Post Office and Shop by 15th March. If you don't bother, then it is unlikely the Parish Council will spend the time, effort and money on a Neighbourhood Plan for Marden and we will have to rely on whatever the County

Plan says about land use and we will have little say on the siting of housing, employment areas, recreational facilities and so on.

The Parish Council think this is important but if you don't, then of course that it is your decision.

Yours sincerely,



Michael Parkes
Vice-Chairman – Parish Council





All photos courtesy of Brian Skinner

Questionnaire on Topics for Marden Neighbourhood Plan:

Whilst some detail is included under some headings, this is only for illustration and to guide your thinking. The actual detail will be developed once the community has agreed the Topics.

•

1. Housing Growth – what, where, how much, how quickly?

Issues and concerns may include:

- Large scale development
- Small scale and in-fill development
- "Affordable" or Social housing
- Housing densities
- Housing for Older/Younger/Disabled People
- Housing on Farms
- Energy efficiency

Should we include **Housing Growth** as a topic in the Marden Plan?

Circle how important you think this topic is? Critical / Very important / Less important

•

2. Jobs and the Local Economy – what, where, how much, how quickly?

Issues and concerns may include:

- Agricultural uses
- Business, manufacturing, engineering
- Retail
- Leisure & catering
- Working from home
- Local workplaces
- Tourism
- Preventing adverse impacts

Should we include **Jobs & Economy** as a topic in the Marden Plan?

Circle how important you think this topic is? Critical / Very important / Less important

•


3. Protecting our Environment

Issues and concerns may include:

- Green spaces & wildlife
- Opportunities for active leisure
- Flood risk
- Landscape & Views
- Historic features, listed building and sites

Should we include **Environment** as a topic in the Marden Plan?

Circle how important you think this topic is? Critical / Very important / Less important



4. Improving Community Facilities & Services

- what, where, how much, how quickly?

Issues and concerns may include:

- Open spaces, including sports/leisure
- Medical and related services, e.g. doctors, dentists, pharmacy, clinic
- Herefordshire Council services

Should we include **Community Facilities** as a topic in the Marden Plan?

Circle how important you think this topic is? Critical / Very important / Less important

5. Improving Infrastructure

Issues and concerns may include:

- Roads, footpaths
- Public transport
- High Speed Broadband

Should we include **infrastructure** as a topic in the Marden Plan?

Circle how important you think this topic is? Critical / Very important / Less important

6. Sustaining our Community & Well-being

Issues and concerns may include:

- Shaping development to secure the long-term future for our Parish and to support community wellbeing
- Retail & businesses, pubs, sports hall etc

Should we include **Sustainability & Wellbeing** as a topic in the Marden Plan?

Circle how important you think this topic is? Critical / Very important / Less important

7. Different guidance for different Geographical Areas?

Marden Parish has a mix of geography and existing development and use.

Do you think that the Marden Plan should attempt to give different guidance for different areas of the Parish?

Circle how important you think this topic is? Critical / Very important / Less important



Please add comments on the above topics and list any other issues you would wish to see included below. If you need to, please feel free to attach additional pages to this questionnaire.

If you would like to be kept up to date or to be involved in the development of the plan please provide your contact details:

Name: _____

Address:

Tel. No:

Email:

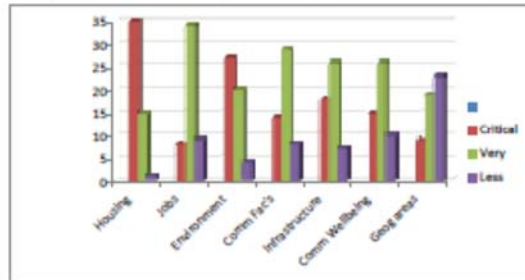
PLEASE PLACE YOUR COMPLETED QUESTIONNAIRE IN THE BOX AT MARDEN POST OFFICE BY 15th March 2014.



Marden Neighbourhood Planning Jan 2014

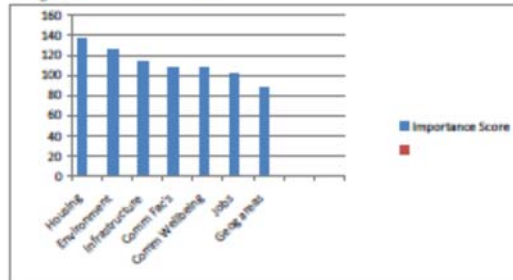
51 Responses

Importance of topics	Critical	Very	Less	Score
Housing	35	15	1	136
Jobs	8	34	9	101
Environment	27	20	4	125
Comm Fac's	14	29	8	108
Infrastructure	18	26	7	113
Comm Wellbeing	15	26	10	107
Geog areas	9	19	23	88



Relative Importance if Critical = 3, Very = 2 and Less = 1

Importance Score	Score
Housing	136
Environment	125
Infrastructure	113
Comm Fac's	108
Comm Wellbeing	107
Jobs	101
Geog areas	88



Appendix II – Settlement Boundary Questionnaire September 2014

Copy to go below the Parish Council copy

Neighbourhood Development Plan Steering Group

Extending the village envelope

The Steering Group have been considering how to extend the village envelope, or Settlement Boundary, to achieve the target set by Herefordshire Council's Core Strategy for an 18% increase in housing up to 2031, equivalent to 90 new houses. A planning application for phase 2 of Paradise Meadows development has already been made and is likely to deliver 16 new houses. Therefore the Settlement Boundary will need to be changed to reflect this.

However, the Steering Group are aware of another development that is being put forward, to develop the land between the school and New House Farm. This land was identified for development some years ago and is included in the Core Strategy as suitable for development. The Steering Group consider development of this land to be the preferred option to meet the development target for Marden up to 2031 and recommend extending the Settlement Boundary to include this land.

The decision to extend the Settlement Boundary is very important for the future of Marden and the Steering Group are therefore consulting with residents about this now. This consultation is only about the village envelope and there will be a much larger and longer consultation about the full draft plan at a later date.

The map of the current Settlement Boundary with the planned extension is on the back of the answer form on the next page. However, as it is difficult to see clearly in black and white, coloured copies of the map have been put up on the parish notice boards for you to consider. Or go to the Parish Council Neighbourhood Development Plan page at www.mardenvillage.co.uk to see the map.

Once you have considered the map, please complete the Response Form on the next page, tear it out and post it into the box at the village Post Office by 15 September. Alternatively you can use the Contact page on the website (as above) to send your response and the information requested on the Response Form.

The Steering Group hope that you will take this opportunity to help shape the future of Marden up to 2031. This is your chance!

Next page

Neighbourhood Development Plan

Consultation on extending the Settlement Boundary for Marden village

1. The preferred option of the Steering Group is to extend the Settlement Boundary to include the land for Paradise Meadows phase 2 and the proposed development between the school and New House Farm, to achieve the 18% target of about 90 houses.

Do you agree with this option – please tick the relevant box

Strongly agree ☐ Agree ☐ Disagree ☐ Strongly disagree ☐

2. Do you think the Settlement Boundary could be altered in a different way to achieve the same amount of growth and new houses?

Yes ☐ No ☐

If 'yes', please tell us how

.....
.....

3. Please tick the relevant boxes to tell us a little about yourself

Do you live:

Within the current Settlement Boundary ☐ Close to the Settlement Boundary ☐

Within the rural parish ☐

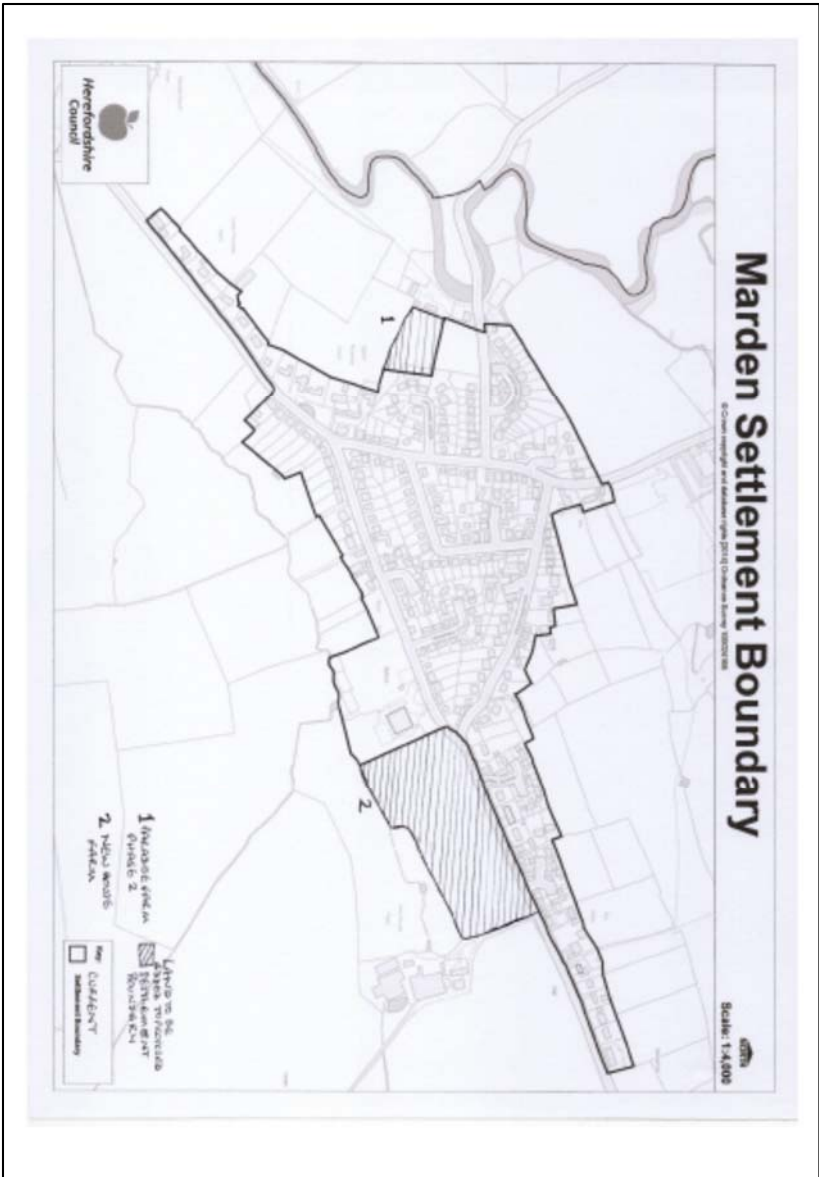
Are you:

Male ☐ Female ☐ Aged under 18 ☐ 18-25 ☐ 26-65 ☐ Over 65 ☐

Employed/self employed/in education ☐ Not currently employed ☐ Retired ☐

On behalf of the Steering Group for the Marden Neighbourhood Development Plan, thank you for completing this Response Form.

Please tear out the form and post it in the box at the Village Post Office by 15 September.



Analysis of responses

Questionnaires were sent to all properties within the Parish, as an article within News & Views (the Parish Magazine). 47 individual forms were received. It is not possible to identify if more than 1 completed questionnaire applied to a specific property, as forms were returned to a box in the village shop or emailed to the Clerk.

There were 57 responses, as some questionnaires gave details of more than 1 adult on a form. No respondent identified as 'Aged 18-25' or 'Not currently employed'. Not all questionnaires had complete demographic data and some individuals did not answer every question. Therefore the analysis uses the responses given for each question.

1. The preferred option of the Steering Group is to extend the Settlement Boundary to include the land for Paradise Meadows phase 2 and the proposed development between the school and New House Farm, to achieve the 18% target of about 90 houses.

Do you agree with this option?

31.5% of respondents (18) strongly agreed – of these 66.6% (12) live 'Within the current Settlement Boundary', 11.1% (2) live 'Close to the Settlement Boundary', 22.3% (4) live 'Within the rural parish'

50.8% of respondents (29) agreed – of these 58.6% (17) live 'Within the current Settlement Boundary', 6.8% (2) live 'Close to the Settlement Boundary', 34.4% (10) live 'Within the rural parish'

1.7% of respondents (1) disagreed – who lives 'Within the current Settlement Boundary'

15.7% of respondents (9) strongly disagreed – of these 88.8% (8) live 'Within the current Settlement Boundary', 11.2% (1) lives 'Close to the Settlement Boundary'

Overall 82.4% respondents strongly agreed/agreed

2. Do you think the Settlement Boundary could be altered in a different way to achieve the same amount of growth and new houses?

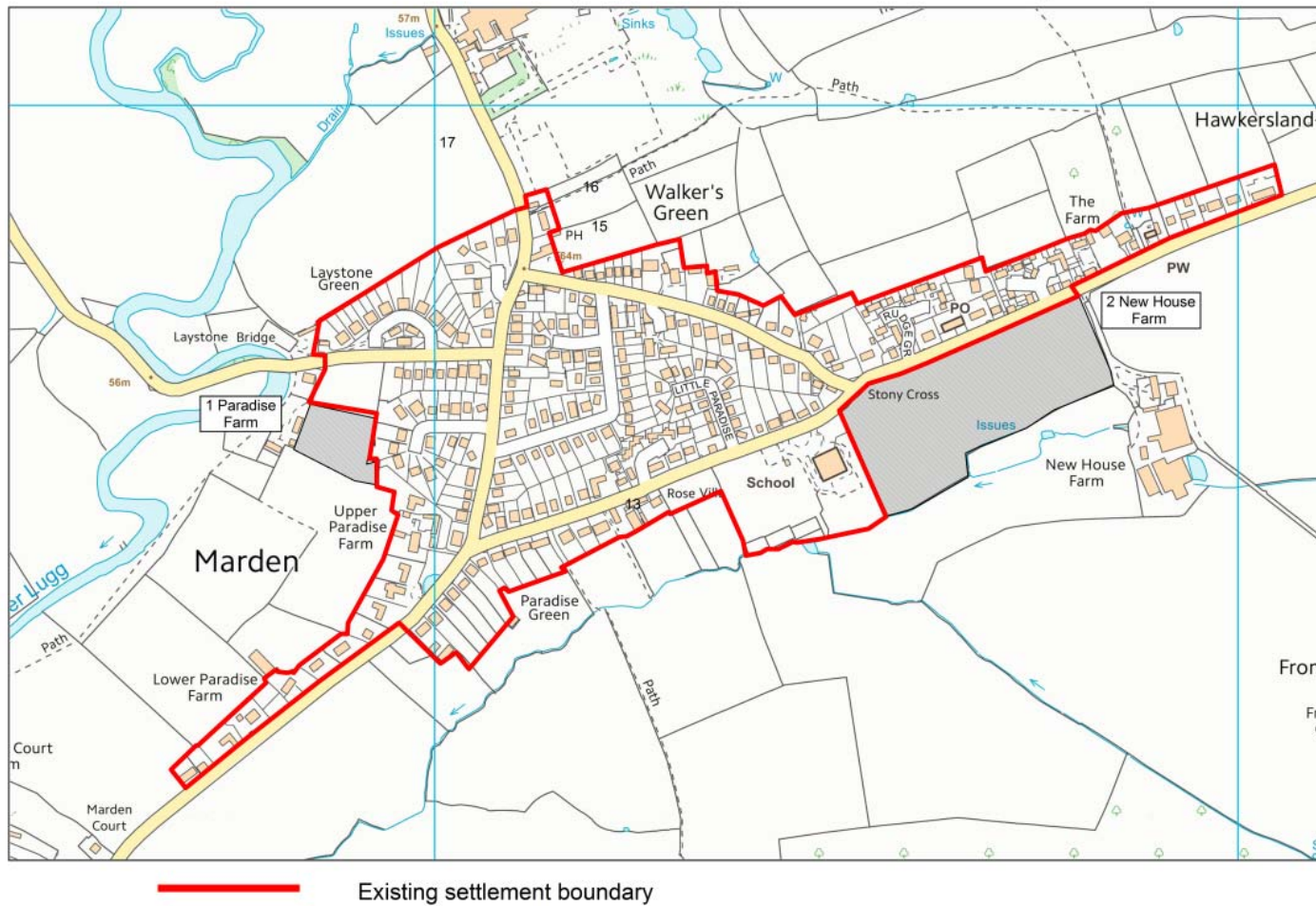
14% (8) of respondents stated 'Yes' – of these 62.5% (5) live 'Within the current Settlement Boundary', 12.5% (1) live 'Close to the Settlement Boundary', 25% (2) live 'Within the rural parish'

Comments from residents:

- Find a field on the outskirts of Marden not in the middle of the village! We live opposite the field and moved from Hereford to be in the countryside. If these houses go up then we will be moving as we will not look at them
- Expand the phase 2 Paradise Farm, as the services are already installed in this area
- Not use green field sites
- This is proposed development in open countryside. See Hereford Core Strategy – 90 houses is disproportionate – ‘for individual villages of each HMA this is translated as a % of the total number of dwellings in the village core’ i.e. maybe half of 90. Allowing for brownfield development conversions (e.g. demolish house and replace with 4 flats) the proposed number gets smaller. The areas outlined for extension of the settlement boundary are far too big. New House Farm proposed extension to settlement boundary could absorb the 16 houses planned for Paradise Farm 2 and allowing for say, another 20, the area could be much smaller, retaining more open countryside outside the limit of the present boundary
- 90 seems to be a very large number of properties. I only agree if the mix of properties favours the lower end of the housing market allowing young work people to purchase (not only affordable housing)
- The Council has already decided to approve phase 2 at Paradise Meadows so the boundary is to all intents and purposes redundant. Additionally if the boundary is expanded then it will be ‘acceptable’ to add housing beyond the perimeter because it is only just outside but is adjacent
- I wouldn’t have a problem with the proposed development at Brook Farm but believe New House to be a better option
- Small developments outside village
- Paradise Meadows is already over developed. Target can be achieved by only developing area by school
- Use the land behind Rudge Grove and Springfields. Space reserved for possible expansion of school
- It would be a good idea for the provision of a new village community hall to be built on the New House Farm site, as the one at the school is too small

3. 45.6% (26) males; 54.4% (31) females
52.6% (30) aged 26-65; 38.5% (22) aged 65+
36.8% (21) employed/self-employed; 59.6% (34) retired

Land to be added to proposed settlement boundary



Appendix III – Level of Growth consultation November 2014

Marden Parish Council **Neighbourhood Development Plan** **Options Consultation Analysis**

Consultation forms were sent to all properties within the Parish, as an article within News & Views. 61 individual forms were received, returned to a box in the village shop or by email to the Clerk. However some properties returned more than one form. As there are 1090 adults on the 2014 electoral register, the response rate was low.

This consultation was concerned with the level of development within Marden village as follows:

In the last 15 years over 30 homes have been built in Marden parish. The Herefordshire Council Core Strategy sets a target for Marden village for a further 40 houses to be built by 2031, in addition to 25 that have been given permission or built since 2011. In addition, there may be limited building in the hamlets of Burmarsh, Litmarsh and The Vauld, for specifically defined local need only. However, the Steering Group for the Marden Neighbourhood Development Plan believes that the target of 40 is likely to be exceeded.

The Steering Group considers that in the next 17 years up to 100 new houses could be built in Marden village while remaining true to the Vision for Marden in 2031. The Steering Group believes that this level of development will help sustain existing parish facilities and may support their improvement while retaining and enhancing our rural character.

To finalise the Draft Neighbourhood Development Plan, we need your views about levels of development in Marden village. Please tick ONE box from the options below:

1. There should be only the 40 new houses required by the Herefordshire Council Core Strategy by 2031 ☐
2. The preferred option of the Steering Group for 100 new houses by 2031 ☐
3. Development of up to 150 new houses by 2031 ☐
4. Development in excess of 150 new houses by 2031 ☐

Which area of the parish of Marden do you live in?

The results showed 30 responses identified 40 more new houses as the level of development, while 31 responses identified 100 new houses as the level of development. No response identified either up to or in excess of 150 houses to be developed.

43 respondents live within the settlement boundary, 16 respondents live outside the settlement boundary and 2 respondents did not identify an area.

Of those who live within the settlement boundary – 19 respondents identified 40 houses, 24 respondents identified 100 houses.

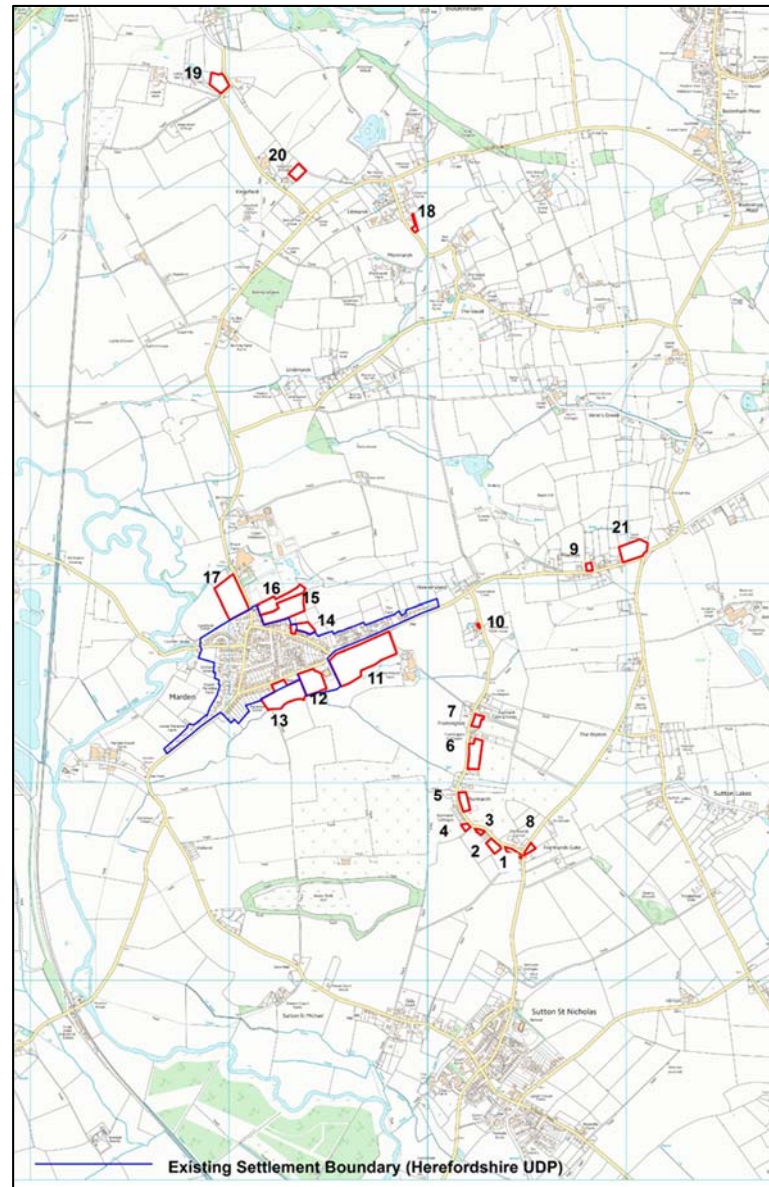
Of those who live outside the settlement boundary – 10 respondents identified 40 houses, 6 respondents identified 100 houses.

47

The following comments were made. Each bullet point gives comments from a separate form:

- Will help maintain local services
- At least 50% to be affordable for first time buyers
- Can I join the SG?
- Any more would swamp village, what about the school?
- Development by school is preferred
- Any development should be by the school
- I get a very strong impression that you have decided on the answer before asking strongly leaning question
- I feel 60 houses maximum would be ideal
- Too big and a village completely loses its character, support & identity. We are experiencing that now as it grows in housing
- Excess building traffic, any more than 40 would be a large estate - houses + garages + gardens + roads, what benefits would there be to the village? Danger to pedestrians/cyclists/dog walkers, where there are no pavements, of extra traffic
- More houses = more traffic - not wanted
- Bungalows should be included
- The roads are not suitable for too many houses
- There is already too much traffic in the village
- Dog barking incessant. New development will need dog warden to issue fines around the village
- 40 is enough thank you. You will spoil the peace and quiet we enjoy
- Local roads already poor without extra traffic
- Keen to preserve character of the parish
- This form is too easy to falsify by those who have interest in increasing support for greater development (response printed off website)
- I think development should be by the primary school where there is already a road. I am against Brook Farm (flooding/lack of services/too large development)
- We like the idea of building on the site opposite the Post Office
- Whilst retaining its character as a rural village community, if the village is to remain sustainable the village must grow. Such growth must be balanced and in keeping with the rural nature of the village
- Properties spread throughout the parish rather than a concentrated single development
- An appropriate development close to the hub (ie. School, shop, community centre) of the village is more likely to be absorbed into, and enrich, the village entity than 'satellite' schemes on the outskirts
- One development phased over 10 years inc community facilities in first phase
- My preferred option for housing by the school
- By the shop I'd prefer for new houses
- My preferred option is in the centre
- I prefer my option to be by the shops
- New houses to be built within the boundary
- Development around the Marden school and home farm would be more central to village services and better safer access than other roads in village
- Essential need for a central community area for village
- Protect our most valuable asset - rurality and nature
- Tastefully developed
- I would like the village to remain a village and not become a town. There is another development going on in addition to this
- More houses means more cars, pollution and congested lanes and building on greenfield sites
- Should be built in Marden village area. Opposed to social housing

Appendix IV Map of all sites submitted for Call for sites exercise



Appendix V – Open Consultation Event 10-11 January 2015

Flyer for Open Event

Marden Neighbourhood Development Plan

OPEN EVENT

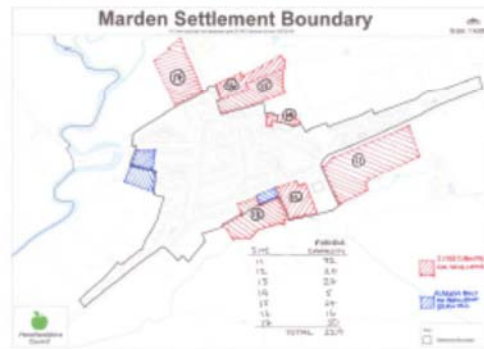
2.00 - 5.00 on Saturday 10 January

10.00 - 4.00 on Sunday 11 January

In the Community Centre

7 sites within or adjacent to the Settlement Boundary of Marden village were submitted in the recent 'Call for Sites'

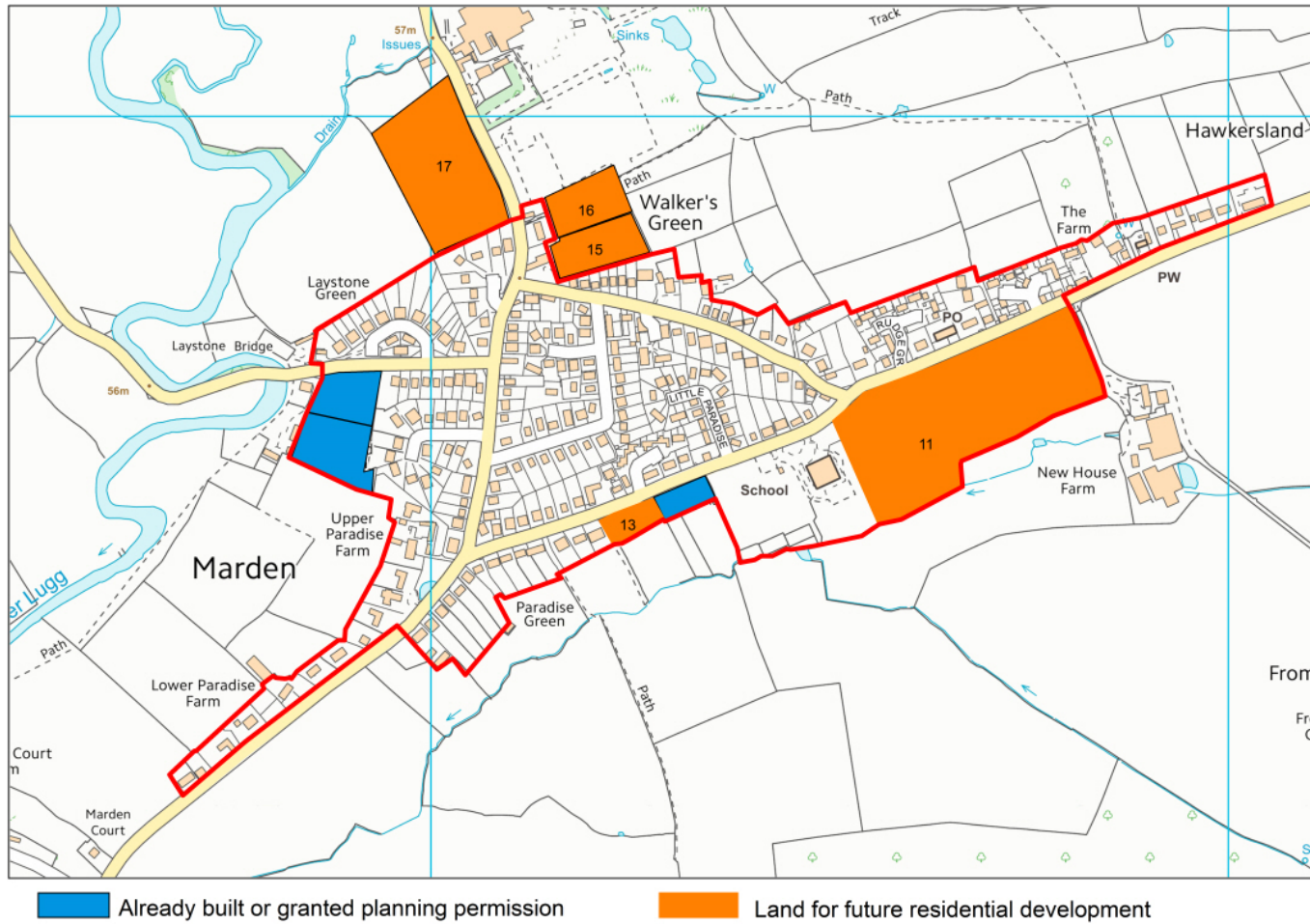
If all of these sites were developed it could mean around 220 extra houses in Marden



The NDP Steering Group have developed a number of possible options for allocating sites for development

Please attend the Open Event and give your view on which option is best for Marden village and parish

Map of 5 sites for Open Event consultation 10-11 January 2015



The Open Event was held on two days to get residents' views on 2 specific issues. As previous consultations had elicited a low response, it was important that this event was well attended. To this end the Steering Group hand-delivered a flyer to almost every household in the parish.

The turnout over the 2 days totalled 216 individuals out of 1090 on the 2014 electoral register, a response rate of 19.8%. 141 households were represented out of 611 households and businesses on the most recent list available, 23.0% response.

There were 198 response forms returned by people who attended the event, and of these 137 not only answered the questions but also made comments. Therefore the Steering Group believe that this consultation provided good community engagement. Of the 198 response forms returned, not everyone answered the first question about the Vision, Objectives and Policies. 5 residents did not rank the sites at all, 2 stating there should be no development. In some cases only some of the sites were ranked and therefore the rest of the sites were ranked equally for accurate statistical analysis – for example if only 3 sites were ranked 1, 2 and 3, the other 2 sites were both ranked 4. In a few cases, residents had ranked 2-3 sites equally and these scores were used in the analysis.

The responses to the questions are shown below, with further analysis given later.

Do you feel the Vision, Objectives and Policies of the current draft Neighbourhood Development Plan are sufficient to meet the needs of the Parish to 2031? Please circle your choice

Yes – 162 (81.8% of those who answered the question)

No – 18 (9.0% of those who answered the question)

How do you rank the sites for housing development within or adjacent to the settlement boundary so that Marden Parish can best achieve the Vision and Objectives in the Neighbourhood Development Plan? Please rank the 5 sites in your order of preference. 1 for your 1st choice, 5 for your 5th choice.

Lowest total is the most preferred site

Site 11 (Land by New House Farm) – total 436

Site 13 (Rose Villa) – total 488

Site 15 (Campsite by The Volunteer) – total 603

Site 16 (S&A site) – total 640

Site 17 (Land opposite Brook Farm) – total 642

An analysis of all the comments that were made was undertaken and a number of specific and recurring topics were identified (as shown in the table on the following page). In relation to question 1, most of those who answered 'no' (about the Vision, Objectives and Policies being

sufficient to meet the needs of the Parish) made comments about keeping development numbers to the 40 indicated in Herefordshire Council's emerging Core Strategy document or stated they did not want any development. The rest of the comments were made in response to the question ranking the sites or as general comments.

All of the data have been considered by the Steering Group when recommending the allocation of sites for development in the draft Neighbourhood Development Plan. The final decision will be made by the Parish Council who have to adopt the Plan so that it can be submitted for the first formal consultation, under Regulation 14 of the Localism Act 2011.

The topics and total number of comments for each topic are given below:

Topics	Total
Concern about roads and/or traffic	23
Negative views on roads/traffic relating to Site 11	3
Negative views on roads/traffic relating to Site 13	4
Negative views on roads/traffic relating to Site 15	8
Negative views on roads/traffic relating to Site 16	9
Negative views on roads/traffic relating to Site 17	10
Wish for only 40 houses or no development	11
Wish for reduced number of houses or none on Site 11	12
Wish for reduced number of houses or none on Site 13	9
Wish for reduced number of houses or none on Site 15	18
Wish for reduced number of houses or none on Site 16	21
Wish for reduced number of houses or none on Site 17	26
Prefer development on smaller sites	15
Prefer brownfield site or infill development	4
Wish for affordable housing/starter or family homes	10
Wish for warden/sheltered housing or housing for elderly	5
Need for surgery and dental services in Marden	14
Need for or concern about other services - broadband/sewerage/water/drainage	10
Concerns about school capacity	6

Need/wish for a village centre/green	10
No need/wish for a village centre	3
Need/wish for new community centre/hall/facilities	12
More street lighting required	4
No more street lighting required	2
Need for more public transport	7
Need for more footpaths/cycleways	8
Need for a village pub	7
Need for a cricket pitch/football ground	8
More/better retail facilities required	3

**Appendix VI – Formal Regulation 14 Consultation
Flyer & Consultation letter**

**Marden
Neighbourhood Development Plan
Regulation 14 Consultation Draft
5 February – 19 March 2015**



Copies of the Environmental Report and
Habitat Regulations Assessment prepared by
Herefordshire Council
are available as follows:
On the Neighbourhood Development Plan page at
www.mardenvillage.co.uk,
or email mardenclerk@gmail.com and request a
a copy by email,
or at the Post Office, St Mary's Church and
the Community Centre.

MARDEN PARISH COUNCIL

5 February 2015

Marden Parish Clerk
7 John Davies Place
Westroft
Leominster
Herefordshire
HR6 8JD
07789 322771

Dear Sir/Madam,

Regulation 14 Public Consultation on the Marden Draft Neighbourhood Development Plan

I am writing to advise you that the Marden Draft Neighbourhood Development Plan has been published for consultation by Marden Parish Council. The Draft Neighbourhood Development Plan has been prepared by a Steering Group on behalf of the Parish Council following informal public consultation on the vision and objectives and key issues.

The consultation period runs for 6 weeks from 5 February to 19 March 2015.

Hard copies of all Neighbourhood Development Plan Consultation documents can be viewed at the following places:

St Mary's Church, Marden from dawn to dusk

Marden Community Centre by arrangement with Chris Wathen on 01568 797876

Marden Post Office at the following times, Monday-Saturday 6.30-19.30 and Sunday 8.00-12.30

Minimarket, Marden at the following times, Monday-Sunday 10.00-20.00

Amberley Arms, Marden at the following times, Tuesday-Saturday 18.00-23.30 and Sunday 18.00-23.00

And with a **Steering Group member** by arrangement – please see the website for contact details.

The Draft NDP, Representation Form, Environmental Report and Habitats Regulations Assessment documents can also be viewed and downloaded from www.mardenvillage.co.uk and from www.herefordshire.gov.uk/planning-and-building-control/neighbourhood-planning/submitted-draft-plans-and-adopted-neighbourhood-development-plans on the Herefordshire Council website.

A Representation Form is provided for comments, but the Parish Council also welcomes comments by email or in writing. Please submit all comments on the Draft Neighbourhood Development Plan by email to mardenclerk@gmail.com or by post to: Marden Parish Clerk, 7 John Davies Place, Westroft, Leominster, Herefordshire, HR6 8JD, by 23.59 on 19 March.

Following the public consultation process on the Draft Neighbourhood Development Plan, the Plan will be amended and submitted to Herefordshire Council together with supporting documentation, including the Consultation Statement setting out who has been consulted, how the consultation has been undertaken and how the representations received have informed the Plan. Herefordshire Council will then re-consult, before the Plan is subjected to an Examination by an Independent Examiner. Once any further amendments have been made the Plan will be subjected to a local Referendum, and then Made (adopted) by the County Council and used to determine planning applications in **Marden Parish**.

If you require any further information please contact the Parish Clerk at the address provided above.

Yours sincerely

Allison Sutton
Marden Parish Clerk
For and on behalf of Marden Parish Council & the Neighbourhood Development Plan Steering Group

List of consultees

Contact Name	Organisation	Address1	Address2	Address3	Address4	Post Code	E-Mail
Mrs M Lindsley	The Coal Authority	200 Lichfield Lane	Berry Hill	Mansfield	Nottingham	NG18 4RG	planningconsultation@coal.gov.uk
	The Gypsy Council	Springs Lane Caravan Park	Bickerton	Wetherby	North Yorkshire	LS22 5ND	
Lucy Blasdale	Homes and Communities Agency	5 St Phillips Place	Colmore Row	Birmingham		B3 2PW	lucy.blasdale@hca.gsi.gov.uk
Peter Baines	Travellers Support Group	c/o Trefoil	Brinsop Common	Hereford		HR4 7AS	
Mr Charles Naylor	West Mercia Constabulary	Police Station	Bath Street	Hereford		HR1 2HT	
Les Vaughan	Central Networks (e-on)	Pegasus Business Park	Castle Donnington	Derbyshire		DE74 2TU	
Alison Brown	Natural Resources Wales	Ty Cambria	29 Newport Road	Cardiff		CF24 0TP	alison.brown@naturalresourceswales.gov.uk
Mr A Morgan	West Mercia Police	Hereford & Worcs Fire and Rescue Service	Estate Services HQ	Hindlip Hall, PO Box 55	Worcester	WR3 8SP	andrew.morgan.60139@westmercia.pnn.police.uk
	Midlands Architecture and Designed Environment	6 - 7 Newhall Square	Birmingham			B3 1RY	
SC George Marshall	Community Risk Manager - West District	Hereford Fire Station	St. Owen Street	Hereford		HR1 2JW	gmarshall@hwfire.org.uk
Michael Vaughan	Arriva Trains Wales	St Marys House	47 Penarth Road	Cardiff		CF10 5DJ	michael.vaughan@arrivatw.co.uk
Mr P Huxtable	British Aggregates Association	10 Brookfields	Calver	Hope Valley	Derbyshire	S32 3XB	
Damien Holdstock/Robert Deanwood	AMEC Environment & Infrastructure UK Ltd	Gables House	Kenilworth Road	Leamington Spa	Warwickshire	CV32 6JX	damien.holdstock@entecuk.co.uk/Robert.Deanwood@amec.com
Ms J Greening	Department for Transport	Secretary of State	Great Minster House	33 Horseferry Road	London	SW1P 4DR	
Executive Coordinating Officer	The Marches LEP	Shirehall	Abbey Foregate	Shrewsbury		SY2 6ND	enquiries@marcheslep.org.uk
	Office of Rail Regulation	1 Kemble Street	City of London	City of Westminster		WC2B 4AN	

	Police and Crime Commissioner	Home Office	2 Marsham Street	London		SW1P 4DF	
Mr P Bayliss	South Worcestershire Development Plan	Wychavon District Council	The Civic Centre	Queen Elizabeth Drive	Pershore	WR10 1PT	paul.bayliss@wychavon.gov.uk
Mr M Chu	London Midland	103 New Street	Birmingham			B2 4HQ	
Adam Harrison	CENTRO	16 Summer Lane	Birmingham			B19 1SD	TownPlanning@centro.org.uk
Mark Jones	NHS Property Services	Parkside House	Quinton Road	Coventry		CV1 2NJU	mark.jones@property.nhs.uk
David Rosling	NHS England	Wildwood	Wildwood Drive	Worcester		WR5 2LG	d.rosling@nhs.net
Catherine Ashford	Welsh Government	Cathays Park	Cardiff			CF10 3NQ	
Mr A Lee	2gether NHS Foundation Trust Headquarters	Rikenel	Montpellier	Gloucester			andrew.lee@glos.nhs.uk
Matthew Todd-Jones/Ryan Norman	Dwr Cymru Welsh Water	Linea	Cardiff			CF3 0LT	
Kezia Taylerson	English Heritage	The Axis	10 Holiday Street	Birmingham		B1 1TG	kezia.taylerson@english-heritage.org.uk
Mr Mark Davies/Mr G Irwin	Environment Agency	Planning Liaison	Hafren House	Welshpool Road	Shelton, Shrewsbury	SY3 8BB	mark.t.davies@environment-agency.gov.uk
Mr S Quartermain	Department for Communities and Local Government	Zone 1/J2 Eland House	Bressenden Place	London		SW1E 5DU	Steve.quartermain@communities.gsi.gov.uk
Malcolm Price	West Midlands Ambulance Service	Hereford Ambulance Station	Ross Road	Hereford		HR2 8BH	
Mr R Jordan/Mr S Bailey	Hereford & Worcester Fire Brigade	St Owen Street	Hereford			HR1 2JW	
Neil Doverty	Wye Valley NHS Trust	County Hospital	Hereford			HR7 2ER	
Stephen Williams	Highways Agency	The Cube	199 Wharfside Street	Birmingham		B1 1RN	stephen.williams@highways.gsi.gov.uk
Mr M Abdullah	National Grid (Transco) now AMEC (LDF 315)	Network Strategy	Brick Kiln Street	Hinkley	Leicestershire	LE10 0NA	mohammed.abdullah@uk.ngrid.com
Mr J Smith	RWE Npower Renewables Limited	Auckland House	Lydiard Fields	Great Western Way	Swindon	SN5 8ZT	jeremy.smith@rwe.com

Mrs H Fleming	Natural England	Consultation Service	Hornbeam House, Electra Way	Crewe Business Park	Crewe, Cheshire	CW1 6GJ	consultations@naturalengland.org.uk
Barbara Morgan	Network Rail (West)	3rd Floor, Temple Point	Redcliffe Way	Bristol		BS1 6NL	
Mr C Field	Network Rail	3rd Floor	Bristol Temple Point	Redcliffe Way	Bristol	BS1 6NL	
John Berry	Sport England	Sport Park	3 Oakwood Drive	Loughborough		LE11 3QF	
Rachel Dixon	Balfour Beatty Drainage						Rachel.Dixon@bblivingplaces.com
Lesley Hay	Moreton-on-Lugg Parish Clerk						thelesleyhay@hotmail.co.uk
Tony Ford	Sutton St Nicholas Parish Clerk						ssnparishclerk@btinternet.com
Chris Smith	Bodenham Parish Clerk						bodenhampcclerk@gmail.com
Chris Bucknell	Wellington Parish Clerk						wellingtonclerk@btopenworld.com
Sophie Glover	Withington Group Parish Clerk						wgpcclerk@hotmail.co.uk
Lynda Wilcox	Ocle Pychard Group Parish Clerk						lynda@halchereford.gov.uk

Appendix VII – Open Event on proposed changes 18-19 July 2015

Flyer

Marden Neighbourhood Development Plan

NEW COMMUNITY CONSULTATION EVENT

Saturday 18 July 2.00 - 6.00 and

Sunday 19 July 11.00 - 4.00

in Marden Community Centre

Following the probable changes to
Herefordshire Council's Core Strategy,
the Marden NDP now needs to:

1. Identify sites for development for a minimum of 104 houses within the parish – up from 65
2. Define Settlement Boundaries for the hamlets of Litmarsh, Burmarsh and The Vault
3. Consider whether to allocate sites for development in the 3 hamlets

**Please come to the event on 18-19 July
– your input is vital**

The changes affect everyone
in Marden Parish,
not just people living in Marden village!

Photos of Open Event 18-19 July 2015





Report of the Open Event on 18-19 July 2015

The event was held at a weekend and 126 parishioners attended, as well as 2 non-residents who own land in the parish. This is 11.4% of those on the current electoral register (1101). 78 households were represented, 13.4% of the dwellings in the parish (580).

111 response forms were returned from 126 attendees. 15 visitors said that they did not want to comment as they did not live in a hamlet. Some parishioners only completed questions relating to the hamlet they live in and some of the general questions. Others gave minimal responses to the general questions.

Parishioners from 49 households attended both this Community Consultation and the previous Consultation Event held in January 2015. 30 other households were represented at the current (July) Consultation, over 60% of whom live in Burmarsh, Litmarsh, The Vault or other hamlets within the parish. An additional 90 households were represented at the January Event – the majority from Marden village.

The results below give numbers of responses and percentages related to the total attendees (excluding non-residents).

The coloured hatched markings on the 3 maps represent changes suggested by attendees. The number of attendees suggesting each change to the Settlement Boundaries is also given.

1. Do you agree with the changes (marked in red on the display sheets) made to the Policies of the current draft Neighbourhood Development Plan? Please circle your choice

Yes = 74 (+2 non-resident) (66.6%) No = 27 (24.3%)

If you answered 'no', please tell us how and what you think should be changed

- Didn't see old policies so cannot say
- Original plan supported by huge majority of villagers who responded, should have voice heard (x 2)
- No building at all
- Should be bigger
- No yes/no answer as NDP process deeply flawed (x 2)
- Areas missed off, Burmarsh extends to Hawkersland Farm
- Not close to existing single track highways
- Should not include Burmarsh as road and utilities limitations (x 2)
- Other hamlets should be considered (x 2)
- Policy M2c – density, d – access to hamlets inadequate, g – who would want affordable housing where no services?
- Policies do not fit rural area – narrow roads, poor facilities etc

- Recent developments failed to expand the village sympathetically. Request to include hamlets dismissed by PC without asking parishioners

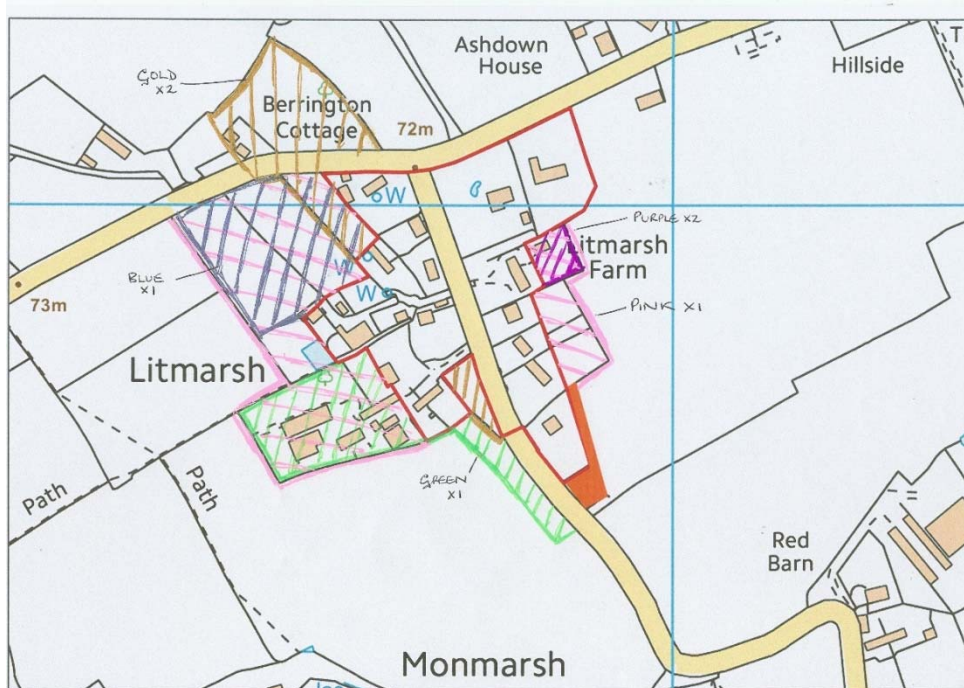
2. Do you agree with the Settlement Boundary for Litmarsh? *Please circle your choice*

Yes = 84 (75.6%) No = 13 (+2) (11.7%)

1 person only responded to questions relating to Litmarsh and some general questions

If you answered 'no', please mark on the map below how you think should be changed

- Settlement Boundary cuts our land in half & excludes barn we want to expand our self-catering business into (x 2)
- Non-residents marked area around Berrington Cottage as extension of Settlement Boundary (x 2)



Response to suggested changes to Settlement Boundary for Litmarsh

- Barn included in purple marking could be submitted as a windfall site
- Buildings in green marking are agricultural and could be submitted as a windfall site
- Inclusion of other areas marked could allow significant disproportionate increase in number of dwellings in hamlet of Litmarsh
- Inclusion of other areas marked extends Settlement Boundary outside built form of hamlet

Changes to Settlement Boundary for Litmarsh recommended following Community Consultation

- Following review by the Steering Group, Settlement Boundary to be amended to cross road and run down right hand side of road for southern part of boundary to be consistent with other Settlement Boundaries by roads
- No extension to Settlement Boundary suitable

3. Do you agree with the allocation of the site marked in orange on the Litmarsh map above? *Please circle your choice*

Yes = 65 (58.5%) No = 28 (+2) (25.2%)

If you answered 'no', please give your reasons below

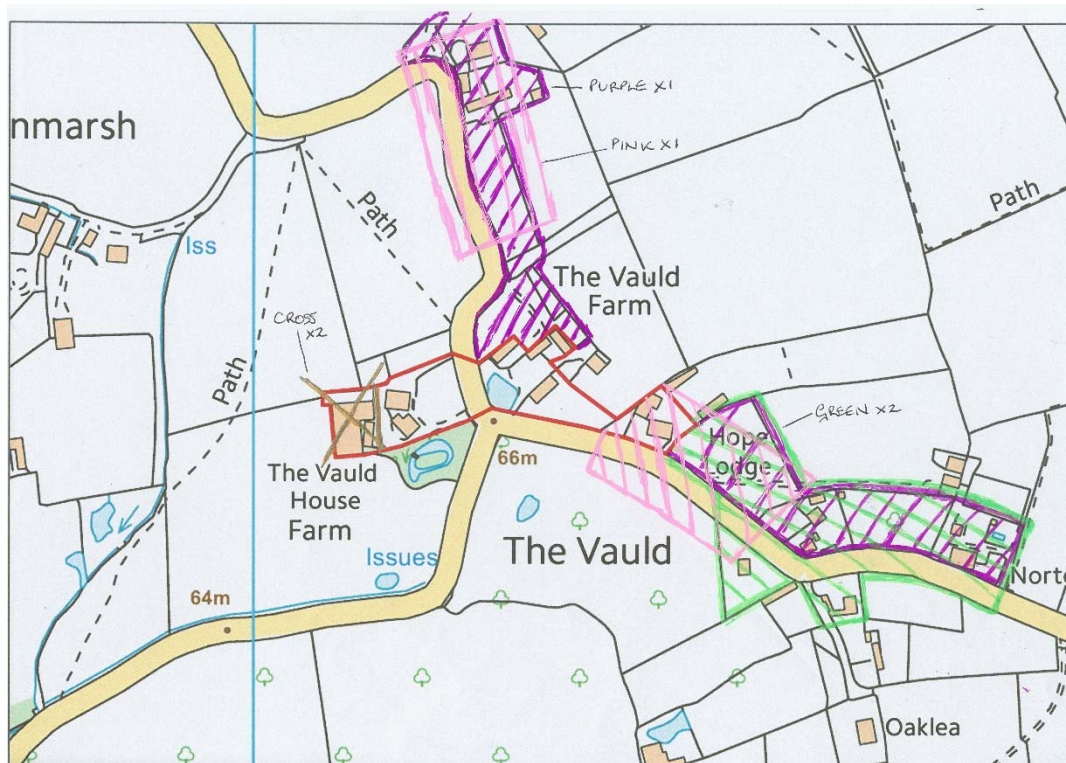
- Plenty of houses already in the area, narrow roads
- Too conservative, not many houses on that strip
- Don't know what people want there but enough housing on small area (x 2)
- Roads unsuitable, lack of drainage, floods, area of walkers/bicyclists/horse riders (x 2)
- No strong feeling but feels like ribbon development
- Area of land purchased by owners of Broxash, access behind The Withies, no infill and was until recently part of large field. Previous planning refused
- Inadequate access, no bus or sewerage, minimal other services
- Site on straight piece of road but non-commercial orchard with road access
- Small residential area needs protecting (x 2)
- Extending small hamlet, not necessary
- How many houses?
- Traffic congestion
- Should be ranked by parishioners (x 5)
- Completely restrictive
- Extend boundary to encompass field around Berrington Cottage (x 2 non-resident)

4. Do you agree with the Settlement Boundary for The Vault? Please circle your choice

Yes = 82 (73.8%) No = 13 (11.7%)

If you answered 'no', please mark on the map below how you think should be changed

- Subject to highway improvements
- 4 of 5 properties in boundary are listed, no room for development, remove The Vault from NDP
- Current boundary includes 2 properties not suitable for development, my suggestion includes alternative sites – 1 semi-industrial, 1 residential
- Almost completely restrictive
- Area marked with cross is agricultural barn



Response to suggested changes to Settlement Boundary for The Vault

- Inclusion of areas marked could allow significant disproportionate increase in number of dwellings in hamlet of The Vault
- Inclusion of areas marked extends Settlement Boundary outside built form of hamlet
- Area marked with cross could be excluded, in line with other boundaries for hamlets

Changes to Settlement Boundary for The Vault recommended following Community Consultation

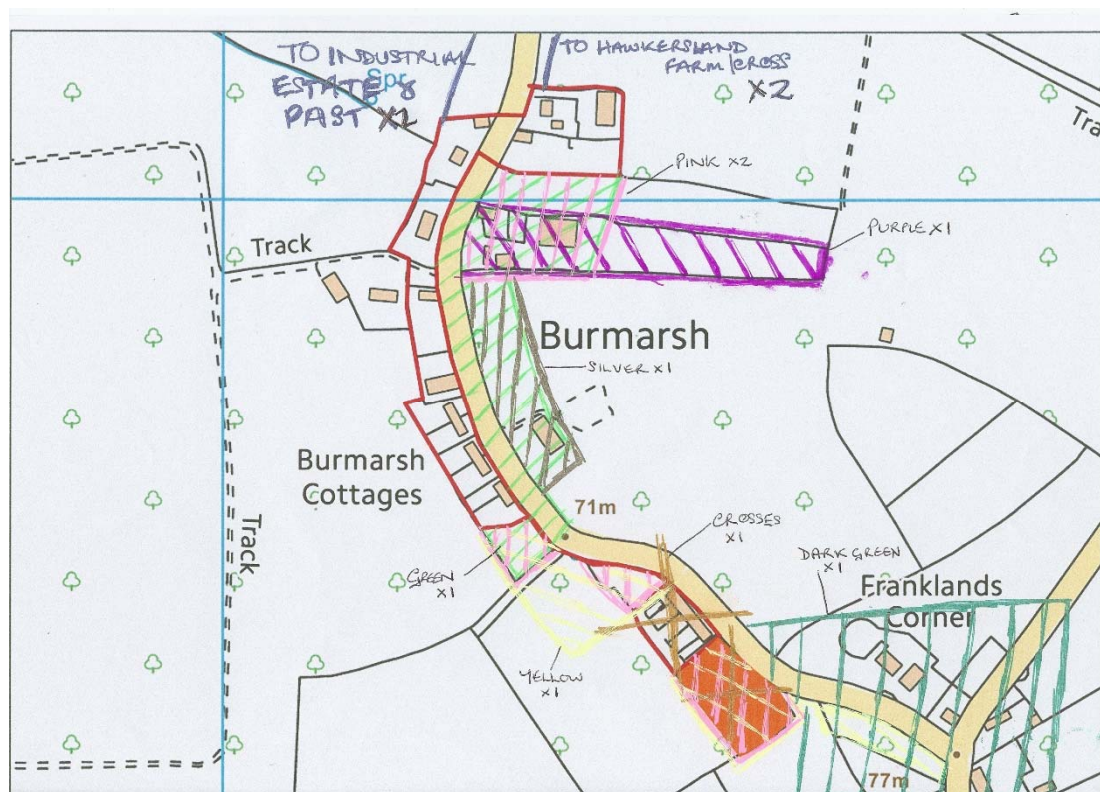
- Following review by the Steering Group, Settlement Boundary to be amended to exclude the agricultural barn on left of map above to be consistent with other Settlement Boundaries
- No extension to Settlement Boundary suitable

5. Do you agree with the Settlement Boundary for Burmarsh? *Please circle your choice*

Yes = 75 (+2) (67.5%) No = 27 (24.3%)

If you answered 'no', please mark on the map below how you think should be changed

- Don't know this area (x 2)
- Should go up Burmarsh Lane to include industrial units but not stop there (x 2)
- Development should be limited to 1/3 of that proposed (x 2)
- All of Burmarsh should be included – maps not marked (x 5)



Response to suggested changes to Settlement Boundary for Burmarsh

- Buildings in light green, pink, purple and grey marking are agricultural
- Inclusion of areas marked could allow significant disproportionate increase in number of dwellings in hamlet of Burmarsh
- Inclusion of areas marked extends Settlement Boundary outside built form of hamlet
- Excluding buildings marked with cross excludes first part (1-8) Burmarsh Cottages
- Extending the boundary to include up to Hawkersland Farm/Cross and/or down to Frankland's Corner would lead to extensive areas of land being available to development with possible very disproportionate development
- Extending the boundary to include up to Hawkersland Farm/Cross and/or down to Frankland's Corner would greatly extend the boundary past the built form, unless separate Settlement Boundaries were defined for the cluster of dwellings at Fromington and Hawkersland

Changes to Settlement Boundary for Burmarsh recommended following Community Consultation

- Following review by the Steering Group, Settlement Boundary to remain as proposed
- No extension to Settlement Boundary suitable

6. Do you agree with the allocation of the site marked in orange on the Burmarsh map above? *Please circle your choice*

Yes = 64 (+2) (57.6%) No = 36 (32%)

8 attendees only marked questions relating to Burmarsh and some general questions. Of these 8 – 6 agree with the proposed Settlement Boundary and 2 want the Boundary extended to Hawkersland. Of these 8 – 7 do not want the proposed site allocated and 1 agreed with the site allocation.

If you answered 'no', please give your reasons below

- Burmarsh is already overbuilt, narrow bad road, dangerous access both ends or at Frankland's Corner (x 5)
- Only if there is thought on access at Frankland's Corner (x 3)
- Mature trees on suggested site (x 2)
- Already have 42 houses and many travel to Hereford from village
- Road not suitable, lack of access, too close to junction/blind corner (x 11)
- Planning on site where farm workers live, single road, no mains drainage
- Extends Settlement Boundary (x 3)
- Ribbon development
- Switch to site 5 to avoid linear development
- Enough development in Marden village
- Sites should be ranked by parishioners (x 5)
- Don't know the area

7. If you do not agree with the allocation of sites within the designated hamlets of Litmarsh, Burmarsh and The Vault, where do you think 6 more houses should be allocated in Marden parish?

- New House Farm has enough (x 2)
- Outside village past Burmarsh turn on fields opposite the scout hut (x 2)
- Why not Urdimmarsh/The Venn/Monmarsh, Settlement Boundary drawn up in ad hoc manner (x 2)
- Marden village (x 5)
- None – why more when over the limit (x 2)

- Agree with allocations (x 2)
- Sites 1-4 and 6-8 in Burmarsh (x 2)
- Towards S&A
- Outside village
- Sutton Walls/Urdimarsh/The Venn (x 2)
- As in July consultation
- Burmarsh allocation only one needed for hamlets
- When ranked by parishioners (x 5)
- The Volunteer site
- Sites 3, 4 and 7 in Burmarsh

8. Future development is limited by the allocation of sites in the NDP as follows:

- To the allocated sites
- To within the Settlement Boundaries and
- To windfall development within the Parish.

This Draft NDP allocates 4 sites for development – 2 in Marden village, 1 in Litmarsh and 1 in Burmarsh. These sites will allow the minimum target for development to be met.

Do you agree with the allocation of these 4 sites?

Yes = 54 (+2) (48.6%)

No = 40 (36%)

If you answered 'no', please give your reasons below

- We do not agree with Settlement Boundary in Litmarsh as it cuts our land in half excluding a barn property (x 2)
- I only support New House due to village facilities being adjacent. I don't think houses should be built around here, keep them in towns and Hereford city outskirts
- Do not agree with further development on site of actual Rose Villa farm buildings including barns (x 2)
- Lesser number of proposed houses in Burmarsh (x 2)
- They are rather limited. I agree with all but the one at Burmarsh. The reason is this site is too close to the highways blackspot at Franklands Gate and Burmarsh Lane is narrow/blind at this spot. There are likely to be ecological challenges to developing this site as well. The Parish need to allocate land slightly further along the road in Burmarsh where the road is wider & there are less mature trees/hedgerows

- The 2 sites within the village should be used, allowing infill to take place if needs arise. A village can easily outgrow its amenities & services capabilities (x 2)
- I agree with 1 site in Burmarsh but the road conditions must be considered and the site would preferably be towards the Hawkersland Farm end of the lane
- I would only agree if 2-3 properties maximum were built in the hamlets, though I prefer none to be built
- There has been no needs analysis. How do we know how many houses are needed in Marden. Before any thoughts of more houses more thought needs to be given to improving & building of a sewerage system in all of these hamlets (x 2)
- More consideration should take place. Today 18.7.15 is the first event I was aware of and invited to
- Building should be confined to the village. Not lanes with no mains drainage, pavements, untreated roads
- Boundaries appear to be sensible. However let's not spoil our village with too many houses. Houses need to be limited and access needs to be considered. 2-5 houses on Burmarsh site 2 would be more appropriate to consider due to size and limited access which needs to be safe
- Should be kept for agricultural
- All except Litmarsh, not suitable (x 2)
- Again I feel there have been enough houses allocated to be built in Marden, I do not feel the need for further houses being built in these hamlets
- I feel there has been enough houses allocated in Marden, which will make Marden a bigger village, so as that has grown I would like to keep surrounding areas like they are, little hamlets and a lovely countryside
- The proposed site in Burmarsh would be too crowded
- It may be possible to build one house within Burmarsh settlement, but already making the situation more difficult (x 2)
- Again I don't accept the premise. One site in Marden village alone will meet the minimum target and more
- Consideration needs to be given to capacity of Marden school and availability of transport (free of charge to family/ guardians) to other schools or secondary schools within the area
- Already explained, the hamlets are unsuitable for further development. The minimum target can be met by the proposed developments already accepted in Marden village. The hamlets should be considered as open countryside to be protected. The extra housing in Marden gives more chance for improved facilities
- Proposed applications to date more than cover the need for housing without developing the areas within the hamlets to allow the minimum target to be met. Marden and part of Burmarsh
- I do not see Litmarsh or The Vault as suitable (infrastructure/services/character)
- Do not agree with such a large site at New House Farm when parishioners wanted smaller sites in the village (x 5)
- Litmarsh and Burmarsh add nothing to the overall plan or do anything for the hamlets. Therefore can be discounted, surely there must be opportunities for infilling
- Development should be spread more evenly throughout the parish (x 2)

9. Do you have any other comments?

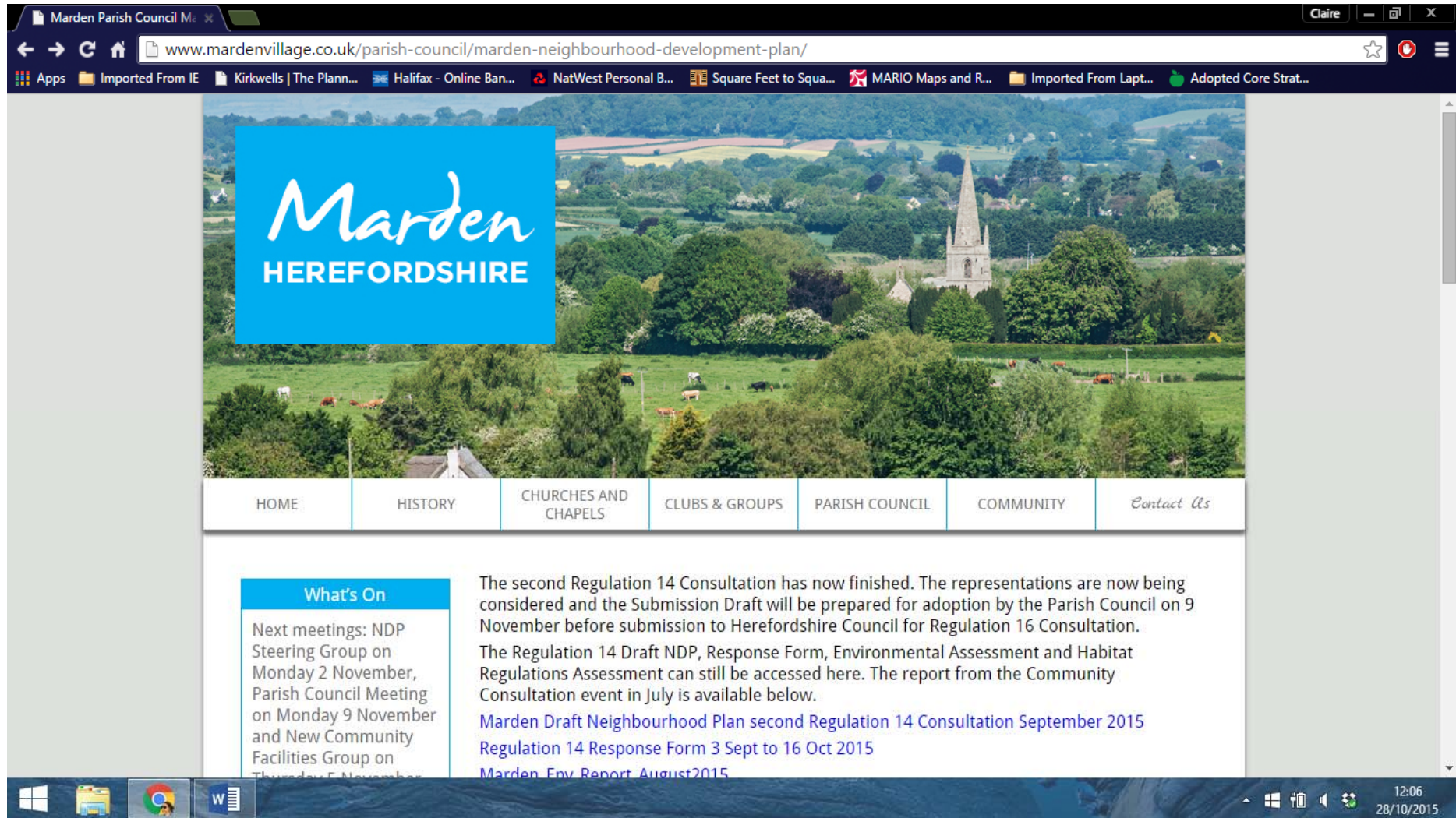
- Best of the sites for development. New House Farm development, would like only 60 max there and good provision for parking and community building
- The 2 new sites earmarked will spread the allocation of new houses. Hopefully allowing younger people, families to move into these areas
- Concerns 1. traffic speed control at school. 2. adequate private parking off road. 3. future school development. 4. new village hall. 5. upgraded recreation facilities. 6. limit development of site 11 to original 60 houses (x 2)
- Development should give more consideration to starter homes (reasonably priced) and bungalows suitable for retirement
- Think Marden will be spoilt with so many extra houses - better to infill than lose complete fields which will be needed for food production in the future. Roads too narrow for increased traffic. Village hall needs to be big enough to have ample parking (x 2)
- Burmarsh development must be carefully considered because of the following: 1. large number of pedestrians (accommodation block) 2. road very narrow in places less than 4 metres. 3. flooding in places. 4 horse traffic. 5. speed of cars/vans/lorries/agricultural (speed limit 60 mhp) (x 2)
- Who is going to live in these houses? Where is the employment coming from? What type of home employment are you recommending?
- Have you taken into account the bus service and time table? Also water, sewage, any future transport problems? Are grass verges protected as corridors for wildlife any use for walkers? Over population
- Please can you offer the people of Burmarsh a chance to propose sites to develop on a decent sized map, please include Fromington in Burmarsh it's where we live. Thank you for today it's a big help
- To build a large number of houses services must be maintained - Burmarsh lane is not maintained, drivers use it as a cut through and drive too fast. Postal papers should be sent to all residents who are unable to attend. Bus services need to be kept. Policing must be kept up
- Yes but not now!
- Would like site 11 to not exceed 60 dwellings, please note 60
- I do not want to see any more than 60 built on site 11, so a few scattered in the hamlets seems a bit fairer
- Best of a bad lot. Overdevelopment = destruction of village life/culture, loss of prime agricultural land which should be used for growing food
- Infrastructure not adequate to accommodate more traffic (x 2)
- Where will all the sewage go!
- You will never keep everyone happy so spread the pain! I agree with the proposal to include the parish & not concentrate on restricting development solely to Marden village. I would hope for significant improvements in the short term in respect of policy M9 re business infrastructure. ie 1. improve broadband facilities, which are appalling when compared to surrounding villages and could be addressed immediately. 2. improve the bus service so that people do not feel isolated. Both of which may encourage people to live in the 104 houses when you finally agree to build them

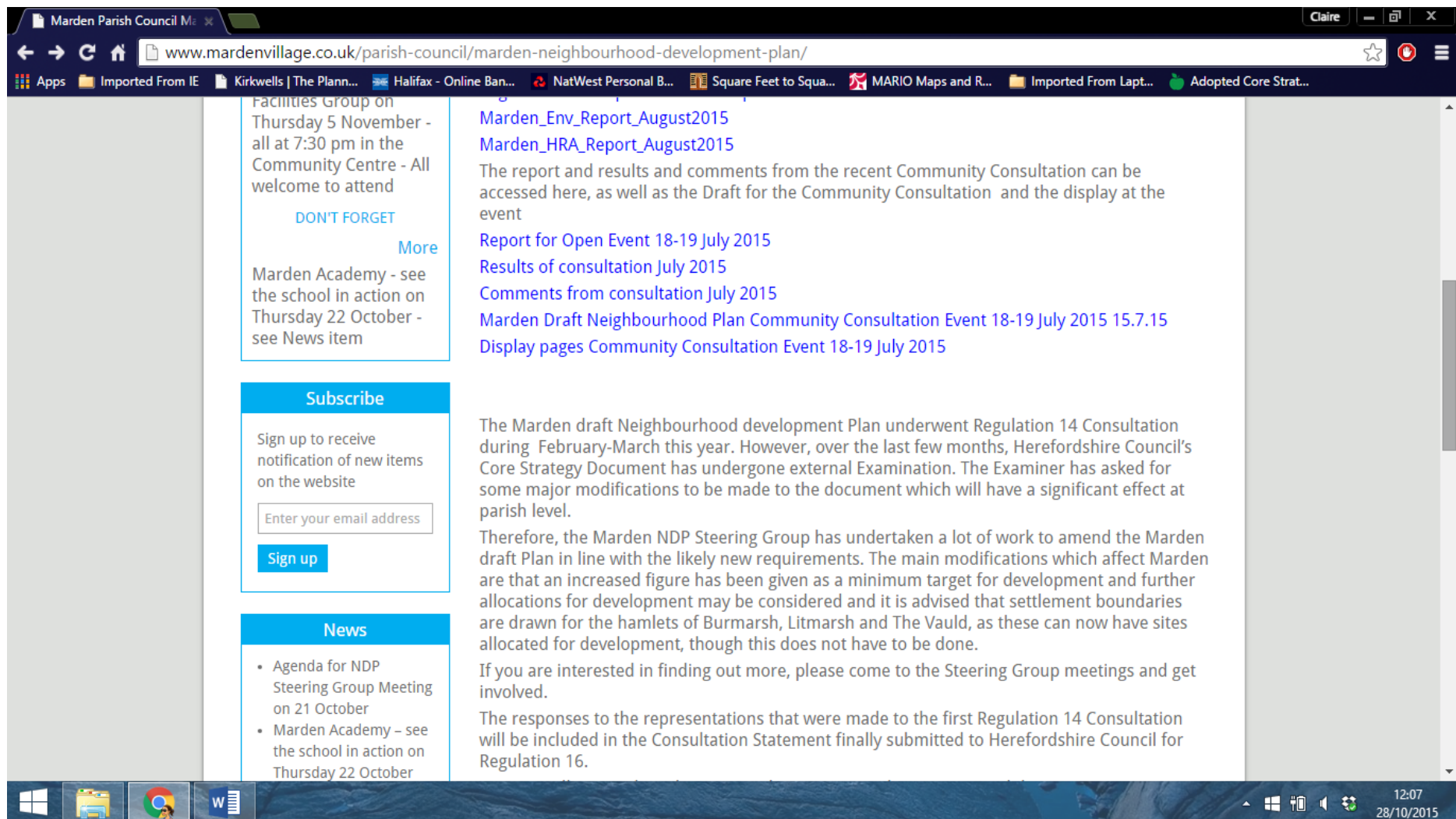
- There is more than enough traffic in these areas as it is, the roads are not suitable for more traffic either. Myself and my family moved into a small hamlet, as we wanted to live in the countryside, without being overlooked by houses, and heavy traffic! I would like to continue to live like this
- We have children and there are other families in the close area, I feel more traffic on this little road could be very dangerous and the traffic coming in from the Sutton side on the bad bend will be dangerous with all sorts of traffic
- I highly agree with the proposal of site 2 in Burmarsh. I feel this plot would fulfil a suitable amount of houses whilst in keeping with the current layout of Burmarsh. Therefore we highly disagree with proposed site 5 in Burmarsh as this would drastically change the layout, feel and desirability of appeal of Burmarsh (x 2)
- Currently there are frequent water pressure problems in Burmarsh and frequent power cuts. The road through Burmarsh already has to handle vehicular traffic for the industrial estate and major vehicles for the orchard operation (x 2)
- All of the development is good for the community but I don't understand, if there is an influx of children where they will go to school. Like in the last development plan there seems to be no school extension to increase the size of the school. This needs to be addressed and I would not be happy if this makes the school overcrowded. I am keen for the council/parish to let the community know what are the plans for the school
- Very concerned about encroachment of green field sites, especially any plans to spread as far as the war memorial! (x 2)
- Marden, like all PCs, is caught in the bind of only getting an NDP approved, if it agrees to ludicrous arbitrary targets which if accepted, will more or less render the NDP unnecessary. It's like Greece in some ways
- Reservations should be considered in respect of plans proposed to allow for: 1. adequacy or otherwise of water supply +/- sewerage disposal 2. adequacy of public transport, not all households will own or use a car (this will become important after bus service review to take place in September 2015)
- Any developments should take into consideration impact of present dwellings. Increase road usage as bus services are more, more withdrawn and lack of good broadband internet, mobile phones in the area of Herefordshire
- All parishes and hamlets need to grow in a small way suitable for local builders to be employed. Huge developments are impersonal, do not reflect any local character, involve large developers who are not local & give undue strain on local services (x 2)
- Thank you for all your hard work (x 2)
- Although we have lived in Marden village for 10.5 years we are not familiar enough with the parish to be able to comment on the proposals for Litmarsh (x 2)
- I think the extended options encroach on countryside sites and that the current development plans for Marden should suffice but the major site be limited to 60 and definitely not 90 for the reasons the PC has advanced
- A form should have been sent to all parishioners to complete
- Family members and local people cannot express their opinions unless on site - this does not reflect the true views of the parish
- Would oppose other sites suggested by Savills Farmcare Ltd (site housing 5-7) but current suggestion for Burmarsh OK (x 2)
- I think the increase in population will spoil our village and lead to it becoming in due course a satellite of Hereford with little green spaces

- Is there no-one with vision? There is nothing in the Marden village which closely resembles what is proposed. If the current thinking by the Marden PC is that no more than 60 buildings will be needed, the New House Farm site should be redesigned to accommodate far less than 90. More sites equal less dense. Designs should also allow flexibility for owners to develop their property to meet their current situation and any future needs! Rather than being forced to relocate
- Having walked through the village this Sunday afternoon, the peacefulness of the rural environment is very noticeable. We should do all we can to protect this for the benefit not only of existing residents but also for any newcomers. One way to achieve this will be for a careful control to be exercised on density on approved sites
- The 2 big developments in the village are both too big, both should be scaled down to allow smaller developments on both sites. This would allow for local tradespeople to be employed. Whereas a large site would probably use outside workforce (x 2)
- Overwhelming preference for New House Farm as a site but plan currently submitted needs modification (x 2)
- There may be better positions for the allocated sites in the development plans
- Having previously lived in Litmarsh, we consider that the area allocated is too crowded. Some limited enlargement would increase the community feel (x 2 non-resident)

Appendix VIII – Regulation 14 consultation 3rd September – 16th October 2015

Screenshots of websites





Marden Parish Council M... Claire

www.mardenvillage.co.uk/parish-council/marden-neighbourhood-development-plan/

Apps Imported From IE Kirkwells | The Plann... Halifax - Online Ban... NatWest Personal B... Square Feet to Squa... MARIO Maps and R... Imported From Lapt... Adopted Core Strat...

Thursday 22 October

- Ash dieback (Chalara) disease has arrived in Marden
- Marden Parish Council's budget consultation and precept requirement
- Noise problems in the village
- URGENT – Volunteers needed for Speedwatch

You can still access the February Regulation 14 Consultation page and documents. The Call for Sites Assessment Report and Assessment Addendum Report are available here. These documents were available to see at the Open Events on 10 and 11 January, along with the working draft of the Neighbourhood Development Plan. The Open Events were well attended and the views of parishioners were gained on which sites should be allocated for housing in the Plan. The Report of the Open Events is available below.

Report on the Open Event January 2015
Marden Call for Sites Assessment Report 5Jan15
Marden Call for Sites Addendum (1)

Background

Neighbourhood planning is the first time that parish councils can make law and therefore it is very important. In Herefordshire it is only parish and town councils that can produce a Neighbourhood Development Plan (NDP). The NDP cannot conflict with either national planning policy or Herefordshire Council's Core Strategy when it is adopted. However, the NDP allows local people to define where and what type of development they want to see in their parish up to 2031.

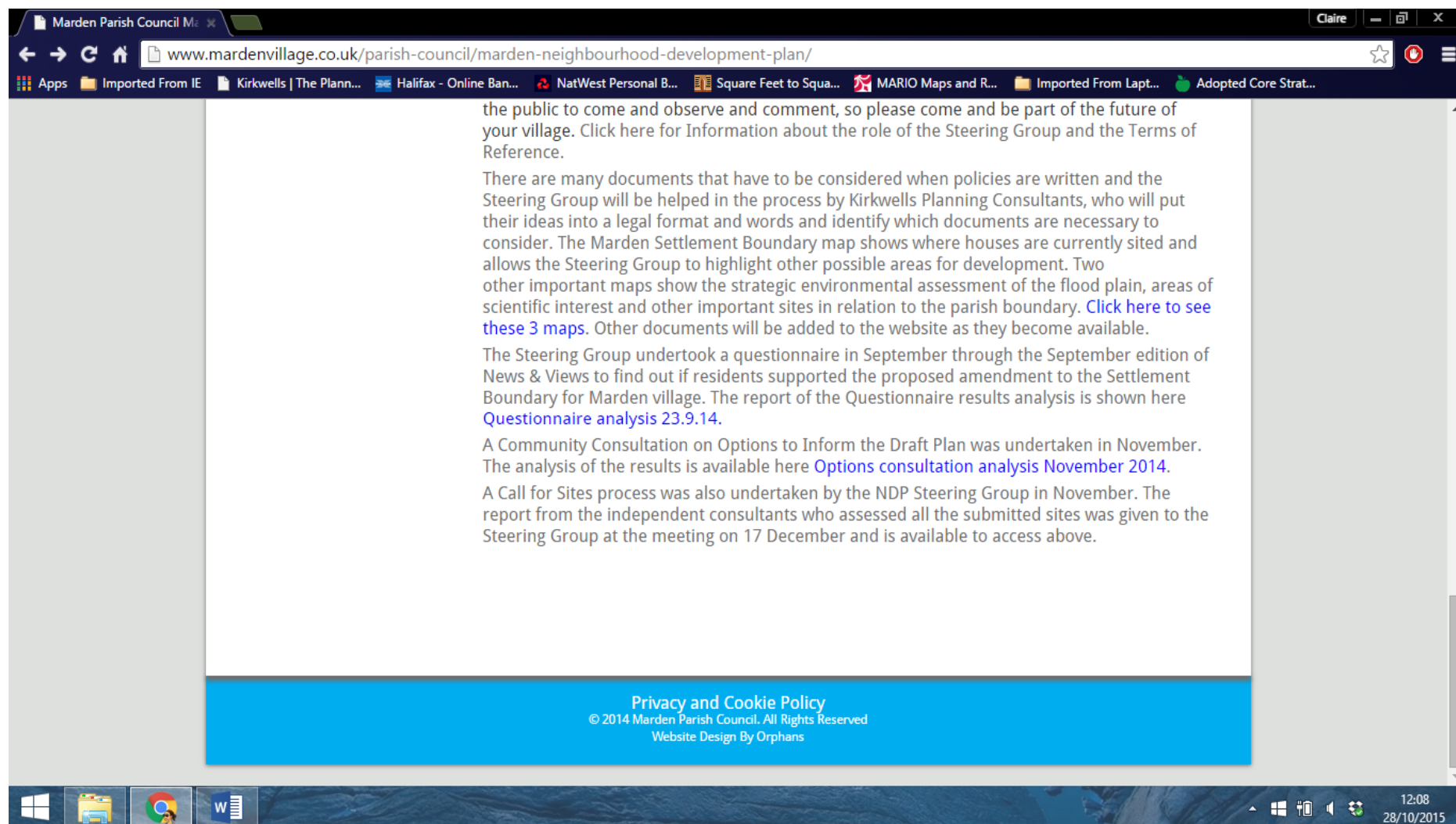
The process of writing a Neighbourhood Development Plan (NDP) for the parish starts with designation of the area which the plan is to be written for. In Marden this is the whole of the parish. A questionnaire was undertaken in Marden to get basic data to help start the NDP process. [Click here for the map, questionnaire and results.](#)

A Steering Group has been set up to identify the policies for the NDP and undertake the work needed to consult widely with those who live, work and do business in Marden. The Notes of the Steering Group meetings can be found [here](#). All meetings of the Steering Group are open to the public to come and observe and comment, so please come and be part of the future of your village. [Click here for Information about the role of the Steering Group and the Terms of Reference.](#)

There are many documents that have to be considered when policies are written and the Steering Group will be helped in the process by Kirkwells Planning Consultants, who will put

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Marden - Herefordshire C x

Claire

https://www.herefordshire.gov.uk/planning-and-building-control/neighbourhood-planning/draft-plans-regulation-14-and-submitted-plans-regulation-16/marden

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 **Herefordshire Council**

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Marden

Marden Parish Council re-submitted their draft Neighbourhood Development Plan to Herefordshire Council on 27 August 2015.

View the draft plan and accompanying environmental reports below:

- [Marden Neighbourhood Development Plan \(PDF\)](#)
- [Draft Strategic Environment Report \(PDF\)](#)
- [Draft Habitats Regulations Assessment \(PDF\)](#)

The consultation runs from 3 September 2015 until 16 October 2015.

Please visit the [Marden Parish Council](#) website which contains details on the consultation and how to respond.

All queries and comments to this Draft Plan should be sent directly to the Neighbourhood Development Plan Steering Group/Parish Council via the following email: mardenclerk@gmail.com and not sent to Herefordshire Council Neighbourhood Planning Team.

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Response Form

Marden Draft Neighbourhood Development Plan
Public Consultation 3 September – 16 October 2015

Representation Form

PLEASE COMPLETE AND RETURN ONE FORM FOR EVERY COMMENT MADE

Office Use Only
Consultee No.
Representation No.

Name	
Organisation (if relevant)	
Address	
Email	
Tel. No.	

To which part of the Marden Neighbourhood Development Plan does your representation refer?

Page Number	
Paragraph Number	
Policy Number	

Are you supporting, objecting, or making a comment? (Please tick)

Support	
Object	
Making a Comment	

Please use the box below and overleaf for any comments.

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Thank you for your time and interest. Please return this form by 19.00 hrs on Friday 16 October 2015 to:

Marden Parish Clerk, 7 John Davies Place, Westcroft, Leominster, HR6 8JD

Or email: mardenclerk@gmail.com

Flyers

MARDEN NEIGHBOURHOOD
DEVELOPMENT PLAN
REGULATION 14 CONSULTATION

DROP-IN SESSION

2.00 – 4.00 PM

SATURDAY 3 OCTOBER

in the Community Centre

All welcome to ask questions or
discuss the Draft Plan with members
of the Steering Group

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**Marden
Neighbourhood Development Plan
Regulation 14 Consultation Draft
3 September – 16 October 2015**



The Draft Plan for consultation can be viewed at the
Post Office, St Mary's Church, Community
Centre, Minimarket and Amberley Arms
& from members of the Steering Group or it can
be accessed at www.mardenvillage.co.uk

Copies of the Environmental Report and
Habitat Regulations Assessment prepared by Herefordshire
Council are available as follows:

On the Neighbourhood Development Plan page at
www.mardenvillage.co.uk, email mardenclerk@gmail.com
and request a copy by email, or at the Post Office and
St Mary's Church.

Consultation letter

MARDEN PARISH COUNCIL

3 September 2015

Marden Parish Clerk
7 John Davies Place
Westcroft
Leominster
Herefordshire
HR6 8JD
07789 322771

Dear Sir/Madam,

Regulation 14 Public Consultation on the Marden Draft Neighbourhood Development Plan

As a result of the Modifications being made to Herefordshire Council's Core Strategy document, the Marden Neighbourhood Development Plan has been amended following a further informal community consultation. I am writing to advise you that the Marden Draft Neighbourhood Development Plan has now been published for a second Regulation 14 Consultation.

The consultation period runs for 6 weeks from 3 September to 16 October 2015.

Hard copies of the Neighbourhood Development Plan Consultation documents can be viewed at the following places:

St Mary's Church, Marden from dawn to dusk

Marden Community Centre by arrangement with Chris Wathen on 01568 797876

Marden Post Office at the following times, Monday-Saturday 6.30-19.30 and Sunday 8.00-12.30

Minimarket, Marden at the following times, Monday-Sunday 10.00-20.00

Amberley Arms, Marden at the following times, Tuesday-Saturday 18.00-23.30 and Sunday 18.00-23.00

And with a Steering Group member by arrangement – please see the website for contact details.

The Draft NDP, Representation Form, Environmental Report and Habitats Regulations Assessment documents can also be viewed and downloaded from www.mardenvillage.co.uk and from www.herefordshire.gov.uk/planning-and-building-control/neighbourhood-planning/submitted-draft-plans-and-adopted-neighbourhood-development-plans on the Herefordshire Council website.

A Representation Form is provided for comments, but the Parish Council also welcomes comments by email or in writing. Please submit all comments on the Draft Neighbourhood Development Plan by email to mardenclerk@gmail.com or by post to: Marden Parish Clerk, 7 John Davies Place, Westcroft, Leominster, Herefordshire, HR6 8JD, by 19.00 on 16 October 2015.

Following the public consultation process on the Draft Neighbourhood Development Plan, the Plan will be amended and submitted to Herefordshire Council together with supporting documentation, including the Consultation Statement setting out who has been consulted, how the consultation has been undertaken and how the representations received have informed the Plan. Herefordshire Council will then re-consult, before the Plan is subjected to an Examination by an Independent Examiner. Once any further amendments have been made the Plan will be subjected to a local Referendum, and then Made (adopted) by the County Council and used to determine planning applications in **Marden Parish**.

If you require any further information please contact the Parish Clerk at the address provided above.

Yours sincerely

Alison Sutton
Marden Parish Clerk
For and on behalf of Marden Parish Council & the Neighbourhood Development Plan Steering Group

List of consultees

Relevant key stakeholders that may need to be consulted include:

The Coal Authority: Should be consulted to make sure any plans you have would not effect or be effected by existing or previous coal mining activity in Herefordshire.

Contact details: planningconsultation@coal.gov.uk

Homes and Communities Agency: The Government's housing, land and regeneration agency and regulator of social housing providers in England. They are interested in increasing the numbers of new and affordable homes being built and or made available, and the amount of land being made available for development.

Contact details: mail@homesandcommunities.co.uk

Natural England: The Government's adviser on the natural environment, providing practical scientific advice on how to look after England's landscapes and wildlife. They will have a view on all Neighbourhood Development Plans.

Contact details: consultations@naturalengland.org.uk

The Environment Agency: Established to protect and improve the environment and have a statutory duty to support sustainable development. They are responsible for regulating industry and waste, treating contaminated land, water quality and resources, fisheries, inland river navigation and conservation and ecology. Consequently they will have a view on all Neighbourhood Development Plans.

Contact details: graeme.irwin@environment-agency.gov.uk

Natural Resources Wales: Performing a similar role in Wales that Natural England does over the border. Will need to be consulted if your Neighbourhood Area adjoins the Welsh border.

Contact details: enquiries@naturalresourceswales.gov.uk

Historic England: The public body that looks after England's historic environment. They are responsible for listing buildings and monuments and provide advice to Government and Local Authorities. They will have a view on all Neighbourhood Development Plans that contain listed buildings or Scheduled Ancient Monuments.

Contact details: west.midlands@HistoricEngland.org.uk

English Heritage: A charity that is responsible for looking after over 400 historic buildings, monuments and sites. They should be consulted if your Neighbourhood Area has one of their properties within it.

Contact Details: customers@english-heritage.org.uk

National Trust: A charity that preserves and protects historic places and spaces across the UK. These include archaeological remains, buildings, gardens, and natural habitats such as woodlands and meadows.

Contact details: mi.customerenquiries@nationaltrust.org.uk

Arriva Trains Wales: Responsible for running trains through the county on the line between Ludlow and Abergavenny. Should be consulted if your area includes, or is adjacent to any part of this route or if your plan has an interest in transport connections that include this line.

Contact details: michael.vaughan@arrivatw.co.uk

Great Western Trains Co. Limited: Responsible for running trains through the County on the line between Worcester and Hereford. Should be consulted if your area includes, or is adjacent to any part of this route or if your plan has an interest in transport connections that include this line.

Contact details: <https://www.firstgreatwestern.co.uk/About-Us/Contact-us>

Network Rail (West): The company that owns and manages the rail infrastructure throughout the County that the two train operators run their trains on. Their interests include the railway itself and the land on which it is built, the stations and network buildings and structures (signal boxes, foot-bridges etc), and include bridges, level crossings, and current redundant lines or railway land. Should be consulted if your area includes, or is adjacent to any part of this route or if your plan has an interest in transport connections that include this line.

Contact details: barbara.morgan@networkrail.co.uk

Highways England: They operate, maintain and improve the strategic road network in England. They are an executive agency funded by the Department for Transport. In Herefordshire their responsibility therefore applies to the A49, A40 and the M50. However they will have a view on all Neighbourhood Development Plans irrespective of whether your area includes these major roads.

Contact details: info@highwaysengland.co.uk

Wye Valley NHS Trust: A provider of health services in Herefordshire. They provide community services and hospital care (acute and community) across the County as well as urgent and elective care to more than 40,000 people in mid-Powys.

Contact details: john.burnett@wvt.nhs.uk

AMEC Environment and Infrastructure UK Ltd: Private company providing environmental, engineering and related consultancy services to the public sector, including in Herefordshire.

Contact details: <http://www.amec-ukenvironment.com/index.html>

RWE Npower Renewables Limited: A private company dealing with the generation, supply and distribution of electricity and gas to the Herefordshire population.

Contact details: jeremy.smith@rwe.com

Dwr Cymru Welsh Water: Provide all the water supply infrastructure across large parts of the County, from collection, storing, purifying, distribution through the mains network, and disposal through the sewerage system. Dwr Cymru Welsh Water will have a view on all Neighbourhood Development Plans so will need to be one of your statutory consultees.

Contact details: forward.plans@dwrcymru.com

Severn Trent Water: Provide all the water supply infrastructure across large parts of the County, from collection, storing, purifying, distribution through the mains network, and disposal through the sewerage system. Severn Trent Water will have a view on all Neighbourhood Development Plans so will need to be one of your statutory consultees.

Contact details: dawn.williams@severntrent.co.uk

Campaign to Protect Rural England: Campaign organisation lobbying on behalf of “a beautiful and living countryside”. Would be interested to be consulted on your Neighbourhood Development Plan.

Contact details: <http://www.cpreherefordshire.org.uk/contact-us.aspx>

Hereford and Worcester Chamber of Commerce: A not for profit organisation that supports the local business community and has a network of 1400 member businesses. They lobby to make sure the interests of local businesses are heard.

Contact details: goodbusiness@hwchamber.co.uk

Woodland Trust: A national charity that works to influence others who are in a position to improve the future of native woodlands. They own over 1000 woods across the UK. Would be particularly interested to be consulted on any matters related to these sites or woodlands as a whole within your Neighbourhood Development Plan.

Contact details: england@woodlandtrust.org.uk

Hereford Civic Society: Is an independent charity that promotes high standards of architecture and town planning in the city; stimulates public interest and debate in the subject; and encourages the preservation and improvement of features that are of public amenity or historic interest. Would only be interested in being a consultee if your Neighbourhood Area is within Hereford City or the surrounding area.

Contact details: herefordcivicsociety@hotmail.co.uk

Herefordshire Nature Trust: The largest membership-based wildlife organisation in the County. It is dedicated to inspiring people about wildlife, being a champion on its behalf and creating or protecting wildlife havens.

Contact details: enquiries: herefordshirewt.co.uk

Ledbury and District Civic Trust: See details for Hereford Civic Society. Would only be interested in being a consultee if your Neighbourhood Area is within Ledbury or the surrounding area.

Contact details: chairman@ledburycivicsociety.org

Ross-on-Wye and District Civic Trust: See details for Hereford Civic Society. Would only be interested in being a consultee if your Neighbourhood Area is within Ross-on-Wye or the surrounding area.

Contact details: secretary@rosscivic.org.uk

Leominster Civic Trust: See details for Hereford Civic Society. Would only be interested in being a consultee if your Neighbourhood Area is within Leominster or the surrounding area.

Contact details: c/o Leominster Community Centre, Leominster, HR6 9HA

Madley Communications Centre: A British Telecom Earth satellite tracking station which is used for international telephone, fax and television transmission and reception.

Contact details: Madley Earth Satellite Station, Madley, Herefordshire, HR2 9NH

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