

Latham, James

From: donotreply@herefordshire.gov.uk
Sent: 09 October 2016 15:37
To: Neighbourhood Planning Team
Subject: A comment on a proposed Neighbourhood Area was submitted

Comment on a proposed neighbourhood plan form submitted fields	
Caption	Value
Address	
Postcode	
First name	Alan
Last name	Eldridge
Which plan are you commenting on?	Cradley
Comment type	Objection
Your comments	<p>Policy CSNDP 8 is unduly restrictive. This is because it rules out any form of community development within the 'Strategic Gap'. Any land that can go for development in Cradley will tend to go for residential use - because that is where the money is. So if we need some sort of community building, where is to go? The answer is that it has to go somewhere that is suitable and available. This is likely to be outside the settlement boundary and may be a site that has been found to be unsuitable for residential development. One of the obvious places would be the 'Strategic Gap', particularly as it is in the middle of Cradley, accessible from both halves. The Strategic Gap is not in the AONB which is a nationally important designation and yet the policy is far more restrictive than the AONB policies. It is generally agreed that the coalescence of east and west Cradley would be a bad thing, but there should be an additional exception within the policy which allows for community development.</p>

Latham, James

From: Alan Eldridge
Sent: 09 November 2016 15:26
To: Neighbourhood Planning Team
Subject: Cradley NDP Reg 16 response
Attachments: REGULATION 16 RESPONSE .docx

Hello,

Please find attached my second response at the Reg. 16 stage to Cradley's NDP.
As you will see, a great deal of this is about procedure and the consultation process.
Please do not tamper with this document without first consulting me.

Regards,
Alan.

Alan Eldridge

REGULATION 16 RESPONSE (5th Nov 2016)

At the Regulation 14 Stage, I sent in a lengthy response which was critical of NDP process and critical of the consultation process.

In order to explain how badly things had been done, I felt it was necessary to name names – as without doing so, I could not make my points.

A decision was made by others to delete most of the names and also to delete some of the content.

One day after the closing date for submissions, the NDP group refused to allow me to resubmit my document with just the names deleted and so I am now resubmitting that document (see below). I have left names out – as that seems to be a requirement - although it is easy to work out who I am referring to. The parts that were deleted are highlighted in *red italics*.

REGULATION 14 RESPONSE BY ALAN ELDRIDGE (26th April 2016)

PARISH COUNCILLOR, NDP GROUP MEMBER AND CHAIR OF THE HEART OF THE VILLAGE GROUP

Purposes.

- To make sure that the parish is properly consulted.
- To ensure that the NDP is inclusive of the HOV and other proposals.
- To counteract the charge that I have been “sabotaging” the NDP (as said by several members of the NDP group).

Glossary.

- NDP = Neighbourhood Development Plan.
- HOV = Heart of the Village.
- PC = Parish Council.
- NPPF = National Planning Policy Framework.
- SGG = Strategic Green Gap

I am passionate about the future of our community, and I believe it is of utmost importance that the community are properly consulted before finalising the NDP.

BACKGROUND

Cradley's population in 1963 was 340. Since then, there has been a huge amount of housing development: Buryfields, Pixiefields, Huntingdon, Oaklands, Credenleigh, The Farleys, Brookside, Old School Close, Kings Orchard, Chapel Orchard, Finches Corner, St Katherines and Fairlea Close as well as numerous individual dwellings. Three bedroom houses are gradually being extended into five bedroomed ones. The population of the Parish is pushing towards 2000. I doubt if any of the developments listed above were wanted by parishioners before they were built. Many people feel strongly that this village needs to have a centre - although we have the church, village hall, school, the British Legion, the Butchery and the

Red Lion on the main road - we have no focal point. There is definitely a good sense of community here but there is nowhere for the community to focus.

The NDP is the appropriate opportunity to consider how we want to manage inevitable change and should not be viewed ONLY as a means of stopping development. It is the key chance to create a plan for our neighbourhood's development, to find out what, if anything is wanted.

Although there is large support for the Heart of the Village project in the population, I am the only one who represents this view amongst the seven NDP group members. The NDP group have not wanted "a single issue lobbying group" to be over represented. Other members of the HOV group have asked to join the NDP group and been turned down.

(There is currently an unresolved complaint by our county councillor regarding the blocking of a supporter of HOV from joining the PC.)

The idea of an NDP was first discussed at the PC in 2013, and as I have always shown an interest in planning, the PC chairman looked to me and of course *the councillor who became the Leader of the NDP group, who works for a large planning consultancy*. I said at the time that I was happy to be involved in the NDP but we would need to keep it simple. *The NDP Leader, I believe shared these sentiments as we were both busy people.*

HEART OF THE VILLAGE (HOV).

I had long had in the back of my mind the concept of HOV. *Whenever I mentioned it,-the Leader of the NDP aggressively dismissed it saying it would definitely be in contravention of the NPPF and Herefordshire's Core Strategy and therefore could never even be considered. I have tried to discuss this with the NDP Leader.* I have said that it is only an opinion that HOV could never be allowed within the NPPF and the Core Strategy but the Leader has always replied that it is a "fact", not just an opinion. *As the HOV planning application progresses, what the NDP Leader referred to as a "fact" is being proved to be just an opinion.* For instance, the Environment Agency, in response to the HOV planning application have 'no objection'. *The insistence that it was a 'fact' has shaped parts of the NDP for Cradley, particularly the Strategic Gap policy.* By insisting it was a 'fact', there was no reason to consider the merits and viability of an emerging idea that could be absolutely central to Cradley's Development. (Herefordshire Council advises NDP groups to consider emerging proposals and to engage in discussions with stakeholders such as local community organisations and landowners.)

The NDP leader works for a large planning consultancy and so what the NDP Leader says tends to go. As an example of this, the chairman of the PC once said to me "(The NDP Leader) knows more about planning than we will ever know and so I tend to go with what (the NDP Leader) says". Although it was the Chairman that said this, I believe it was and still is the opinion of the majority of the NDP group and the PC.

In June 2014 I shared my HOV ideas with 3 other likeminded parish councillors and the HOV group was born.

In July 2014 the HOV ideas were put to the PC (in the *absence of the NDP Leader*). The PC applauded the concept and agreed to write to the landowners in the area to explore possibilities. Amazingly, Heather Morgan offered to donate Morgan's Field. In August 2014 the PC/HOV hosted a Village meeting to introduce the HOV ideas. The meeting was

attended by c.200 people. 63% were in favour of the general idea as presented. Foolishly, we did not ask for number against or abstentions. *The NDP Leader and their spouse both spoke most vociferously against the ideas presented.*

Advice from various planning professionals, community advice groups and a Herefordshire planning officer was that HOV is exactly the kind of thing that the NDP should be considering.

Herefordshire Council's own NDP guidance notes suggest having discussions with key landowners to help identify appropriate sites. They also explain how the NDP should look to the community for its Vision and Objectives. The notes clearly say "it will be necessary for the steering group to understand whether there are any current or emerging proposals that could affect the area."

Projects like HOV should be specifically included if, after consultation, it was found that there was substantially more than 50% support. Or, if the support was substantial but not conclusive then policies could be drafted so as not to block the projects and the wording could be supportive of them.

Around August 2014, two landowners came forward with proposals that involved housing and a community shop/cafe. One was at Church Stile Farm and the other was on the Beanfield, with an option to include Dilwyn's field as well.

CONSULTATION

In JAN 2015 the HOV group (now separate from PC) held a Public 'Options' consultation meeting, attended by 70 people, to discuss 15 different options for a shop/ cafe at different locations within the village and to gauge public opinion. From my reading of all of the guidance, this is exactly what the NDP should have done. But, as can be shown by various emails (and one newsletter sent out to all the parish) from the Chairman of the PC, the general opinion of the majority of the PC and NDP group was that NDP's were all about housing only.

Following the HOV Options Consultation, the HOV group were interested in exploring the possibilities of the Beanfield option but in the end we judged that public opinion would not support a deal with housing developers. We felt our goals would be more achievable if we purely concentrated on a plan for a shop and cafe in Morgan's field.

The PC/ NDP group did not want to be seen to be supporting or in any way encouraging developers and because the HOV group had been talking to developers, they treated the HOV group the same as developers, even though, by now, it was purely a community project involving no developers. I was a lone voice on the NDP group, but with the help of advisors managed to persuade the NDP team that they should present the options available to the parish. And so it was that a public meeting was held in June 2015 in the church, attended by 200 people at which presentations were made by the owner of Church Stile Farm, another by the agent for The Bean Field / Dilwyns Field and another by the HOV group, who showed a 5-minute video. The Chairman of the PC promised the public that they would soon be consulted on these options in a questionnaire.

Various draft questionnaires were written and debated particularly concerning bias and spin. One draft began by referring to our "Quintessential Herefordshire Village", the implication being that nothing could possibly be done to improve it. *I felt that the*

NDP Leader was using the NDP for their own personal agenda against the HOV and the NDP Leader felt that I was trying to use the questionnaire for the benefit of HOV (this led to a call for my temporary resignation from the NDP (email 12th June 2015). I did not resign but instead fought long and hard for a fair and un-biased questionnaire and I believe we achieved it in the end. On 5th Aug, after several months and many hours of meetings, the NDP (in my absence) unanimously agreed to present the questionnaire to the PC. Although the Draft questionnaire was unanimously agreed by the NDP, it was rejected by the PC following a vitriolic 3-minute speech by another councillor who made accusations of “bringing the PC into disrepute” and “gerrymandering” by the HOV group. No evidence was given for the charge of gerrymandering. *This councillor is a member of the PC and NDP group, and had been part of the unanimous vote in favour of the questionnaire only days before!* This is a very important point, as it is hard to see why the PC, who have no specific knowledge of the NDP process, and had not, unlike the NDP group, spent 3 months working on the questionnaire, felt able to vote out the hard work of their own experienced NDP group. Those present at this PC meeting who are also members of the NDP group voted as follows: one for (the councillor who made the vitriolic speech), one against (myself) and one abstention (The Chairman). *The NDP Leader* was not present at this meeting and the 3 lay members of the NDP group were obviously absent too - so the views of 4 other NDP group members were never formally sought or heard. Within about 10 minutes the PC voted in a “simplified” questionnaire asking 4 questions and once voted in, it was a ‘fait accompli’. The questions were: -

Q1. (Online version). Do you want the provision for an additional shop?

Q1. (Paper version). Do you want the provision in the NDP for a second shop and/or café in addition to the Butchery and General Stores?

Q2. (Online version). Do you want provision in the NDP for sports pitches?

Q2. (Paper version). Do you want the provision in the NDP for new sports pitches with car parking?

Q3. (Online version). Do you want the strategic gap kept clear of development?

Q3. (Paper version). Do you want the NDP to keep the area often referred to as the ‘Strategic Green Gap’ between East and West Cradley as an area free of development?

Q4. (Online version). Do you want restrictions on housing development?

Q4. (Paper version). Do you want the NDP to make restrictions on the size in terms of housing numbers of future housing development?

(I don’t know why the online version was different to the paper version.)

These questions were basic, but some were in my opinion ‘loaded’ questions, intended to give the desired results. If you ask people if they want development without indicating what that development might be, the answer is almost bound to be “no”. Pick any of the fields that surround Cradley and ask “would you like this field to be kept free of development?”, the answer is bound to be “Yes”. The evidence for the community’s desire for the gap is based entirely on this questionnaire. As far as I can discover, the Strategic Gap was defined and thought to be a good thing as part of the Malvern Hills Plan in the

1990's. Although it was written into previous documents, there were no surveys to back up the desire for the strategic gap. The 'gap' came about through the writings of groups of well-meaning people who wrote the Malvern Hills Plan and the Village Design Statement in 2004. There is no mention of the Strategic Gap in the 2010 Parish Plan.

All of the proposals (except the sports field) involved a community shop and cafe and yet, the question asked was "Do you want provision in the NDP for a second shop and/or cafe in addition to the Butcher's?" The inclusion of the reference to the Butcher's may have been a deliberate attempt to steer to people towards a "no" answer. There was no need to include the reference to the Butcher's in the question.

HOV QUESTIONNAIRE. Autumn 2015.

The HOV group felt that it was crucial to find the genuine opinion of the community and, as the PC had decided not to ask about our (or any other) proposal, HOV decided to do our own questionnaire. We planned to submit this information to the NDP group, whether they wanted it or not! 3 questions were asked.

- Do you support the proposal for a Heart of the Village at Morgan's Field?
- Would you be interested in being a volunteer to help in the shop/cafe?
- Would you be interested in buying shares in Heart of the Village (£10 minimum)?

We tried to be as fair as possible and to gain opinions both for and against. Although the questionnaires were hand delivered, very, very few people filled their questionnaire in as we waited. The majority of the responses were received online. In order to have a valid response, we asked for named responses only, and the outcome was approximately 85% in favour. About 50% of those in favour of HOV were interested in volunteering and around 85% were interested in buying shares. There were around 250 responses. Because HOV is a new concept, we found that there were many people who did not feel ready to respond and lots of people who were in favour but didn't bother to respond. The assertion by one of the NDP group, that all those who didn't respond are probably against is totally unsubstantiated.

The PC/NDP have said that the HOV questionnaire results are not valid because they were "the result of a lobbying exercise", and they will not even give these figures the slightest consideration.

NDP QUESTIONNAIRE. Autumn 2015

Meanwhile, the NDP questionnaire was due to run from late August until 22nd September. All NDP meetings are poorly advertised and the meeting on 22nd sept was only attended by likeminded NDP members. I was away on holiday. At this meeting it was decided to allow responses right up until the PC meeting on 13th Oct. This information was not conveyed to the general public and therefore there may well be a bias in the results because of this.

Crucially, the NDP questionnaire gave no definition of the Strategic Gap and although the NDP group are now adamant that people knew the definition, they are wrong. This is proved by the amount of people, myself included, who voted for "no development on the strategic gap" and yet want HOV on Morgan's field. Although many of the NDP group

agreed that it would be a good idea to include a map with the questionnaire, it was rejected due to cost and because *the NDP Leader said* “we have defined the Gap”, even though they had always thought that the map showing the Strategic Gap only in the Bean Field was “a bit misleading”. The definition of the SGG given by the Chairman of the PC at public meetings is “anything that can be seen from the top of Cockshot Hill”! In the most recent PC meeting he explained in more detail how at the time of the Visual Design Statement a team had gone up this hill and seen the green area between the two settlements, and that was the gap that they wanted to preserve.

Morgan’s Field cannot be seen from Cockshot Hill and is therefore not part of the Strategic Gap according to the Chairman of the Parish Council! If he doesn’t know the precise outline of the Strategic Gap, then I think it’s safe to assume that there is widespread confusion amongst many residents of Cradley.

During the previous questionnaire negotiations, HOV members had constantly encourage the NDP to define ‘development’. The NDP group were themselves confused about the definition of this word. Another respected NDP member, who does not want a building on Morgan’s Field said 3 times at the NDP meeting prior to publication of the questionnaire that people would not think of a community facility as ‘development’. And yet the NDP group have now decided that everyone knew that a ‘community facility’ was a ‘development’.

211 out of 301 said “Yes” to question 3 - “Do you want to keep the area often referred to as the “Strategic Green Gap” between East and West Cradley as an area free from development?”

After the questionnaire, it was decided that it was time to write up our NDP document. *The NDP leader recommended an ex-colleague* – David Croft and the PC agreed – no additional quotes were obtained. I abstained in the vote but did not argue as there was an obvious bias against me whenever I spoke in Parish Council meetings. When the appointed NDP writer was questioned further about the Strategic Gap policy, he sought more advice from an *ex colleague, who he knew from his time at the same company that the NDP Leader works for*. On its own this is a trivial thing to point out, but it is part of the bigger picture which all point to a lack of belief and trust in the impartiality of our NDP team.

The NDP had taken 3 months to arrive at an agreed fair and unbiased wording in its original questionnaire, which was thrown out by the PC and replaced after minimal debate by the final, simplistic version. When this circulated throughout the parish, I was amazed to find that it was enclosed within a totally biased and misleading Cradley Reporter. The Reporter is a publication by the Chair and Vice-Chair, it is not approved in any way by the rest of the PC prior to distribution. The Reporter dismissed the HOV questionnaire, saying “Please note that there are several leaflets/questionnaires circulating around the community at the moment which appear to be causing some confusion. These are produced by independent groups and are nothing to do with or connected in any way with the NDP questionnaire. The one included here is the only questionnaire that will influence the NDP.” This was the leadership making it absolutely clear that they had no intention of listening to the public’s opinion regarding HOV. The HOV group had valid data and should at least have some

influence on the NDP. The introduction of the Reporter claimed that the NDP rejected the previous questionnaire which of course is untrue, it was rejected by the PC. The reason it gave for the rejection was that commercial schemes should not be promoted. Again, they have chosen to ignore the guidance from Herefordshire Council that advises NDP groups to consider emerging proposals and to engage in discussions with stakeholders such as local community organisations and local landowners.

Herefordshire Council also advise that plans should focus on guiding development rather than stopping it. The message put out to our community has been quite the opposite

Although in this article I have fought the corner for the HOV, I also feel particularly indignant that the villagers have not been given the opportunity to consider other proposals. Landowners were open to debate about the possibilities but the PC/ NDP would not discuss with developers.

POLICY CSNDP 8; STRATEGIC GAP.

A Strategic Green Gap depicted on the proposals Map, is defined between East and west Cradley. It is protected from all development except that which may be required to mitigate flood risk.

This policy will block any proposal by HOV.

IN CONCLUSION.

- The NDP/PC has failed to properly consult the community with fairness and adequate information.
- Alternative proposals have been ruled out without adequate research or consultation.
- Clear guidance from Herefordshire Council in their NDP notes has been ignored to the detriment of this community.

(5th Nov 2016)

I have read the response by the NDP group and they have failed to answer most of the points.

- They say that any individual who expressed an interest has been encouraged to join the NDP group. This is not true. Sarah Herriot wanted to Join the NDP group but the PC chairman explained in an email that they were very keen not to have more than

one supporter of HOV in the group. This, they said would be an over-representation of a 'lobbying group'.

- In their response, they pointed out that I wrote to 40 people in June 2013 asking people to join the NDP but none of those contacted chose to join is totally irrelevant because HOV did not come into existence until June 2014.
- They have argued that there is not large support for the HOV by referring to the 62% majority of letters opposing the application. They fail to point out that well over 100 of these letters are signed copies of the letter circulated, complete with stamped addressed envelopes - by the spouse of the leader of the NDP!
- The HOV group did not 'state that they should be included in the NDP'. We pointed out that emerging ideas such as HOV should be considered for inclusion in the NDP.
- Referring to the support for HOV as a 'vociferous minority group' is disingenuous. The Parish Council has not consulted the population about HOV. The NDP questionnaire indicates a majority against building in the strategic gap, whilst the HOV questionnaire indicated a much higher majority in favour of HOV.

MY CONCLUSIONS AT REG.16 IS NO DIFFERENT TO MY CONCLUSIONS AT REG.14, AS FOLLOWS:-

- The NDP/PC has failed to properly consult the community, with fairness and adequate information.
- Alternative proposals have been ruled out without adequate research or consultation.

Clear guidance from Herefordshire Council in their NDP notes has been ignored to the detriment of this community.

Latham, James

From: Turner, Andrew
Sent: 04 November 2016 16:09
To: Neighbourhood Planning Team
Subject: RE: Cradley Regulation 16 Neighbourhood Development Plan consultation

Re: Cradley Regulation 16 Neighbourhood Development Plan consultation

Dear Neighbourhood Planning Team,

It is my understanding that planning permission was granted in outline on the land off 'Pixie field' and that no other specific sites have been identified in this plan.

It is also my understanding that you do not require comment on Core Strategy proposals as part of this consultation. I would therefore advise:

- Given that no specific sites have been identified in the plan I am unable to provide comment with regard to potential contamination.

General comments:

Developments such as hospitals, homes and schools may be considered 'sensitive' and as such consideration should be given to risk from contamination notwithstanding any comments. Please note that the above does not constitute a detailed investigation or desk study to consider risk from contamination. Should any information about the former uses of the proposed development areas be available I would recommend they be submitted for consideration as they may change the comments provided.

It should be recognised that contamination is a material planning consideration and is referred to within the NPPF. I would recommend applicants and those involved in the parish plan refer to the pertinent parts of the NPPF and be familiar with the requirements and meanings given when considering risk from contamination during development.

Finally it is also worth bearing in mind that the NPPF makes clear that the developer and/or landowner is responsible for securing safe development where a site is affected by contamination.

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

Kind regards

Andrew

Andrew Turner
Technical Officer (Air, Land and Water Protection),
Environmental Health & Trading Standards,
Economy, Communities and Corporate Directorate
Herefordshire Council, Blueschool House, PO Box 233
Hereford. HR1 2ZB.
Direct Tel: 01432 260159
email: aturner@herefordshire.gov.uk

Latham, James

From: Bruce Herriot
Sent: 08 November 2016 23:12
To: Neighbourhood Planning Team
Subject: Cradley and Storridge NDP

Regulation 16 consultation:

Objection to the Policy 8, Strategic Green Gap.

Dear Sir or Madam,

I wish to object to the above NDP. The consultation process has been done very poorly, and I feel that the resulting document is flawed due to the lack of clear knowledge of what the community wants. My belief is that the NDP group had decided on the desired end result before consultation and they have manipulated the process to fit their needs. There are numerous examples of this occurring.

My own involvement was peripheral until August 2015, but my experience, I believe, shows what lengths the PC will go to to achieve their goals. The Parish Council meeting that month threw out a very good NDP questionnaire that had previously been unanimously approved by the NDP group. The PC then produced, at short notice, what in my view was a tokenistic, inadequate questionnaire. It didn't define the Strategic 'Green' Gap (SGG) and there was no map included. The 'final' SGG is vastly different to the huge area in the Draft NDP, so it would appear that the NDP group were themselves confused about the SGG. The questionnaire also didn't include any specific reference to two important projects that were being put forward in Cradley at that time.

I was so incensed by this questionnaire that I put myself forward to be co-opted on to the PC to see if I could influence future decision making. My application wasn't considered until the October 2015 meeting, as correct process had not been followed by the Chairman and Clerk which led to the PC not accepting my application for the September meeting. As the only candidate the PC voted 8 to 4 NOT to co-opt me, with no reason given for their decision. The process of my co-option was so badly handled that our Ward County Councillor, Patricia Morgan, made a formal complaint against the Chairman of the PC to the Monitoring Officer. This complaint has not, as far as I am aware, been resolved as the Chairman of the PC has, I believe, refused to answer the complaint. He remains to this day as the PC Chairman.

The reason that this is relevant to the NDP is that I believe that the only reason that I wasn't appointed is because my wife had been challenging the NDP process. The 8 Councillors didn't want someone on the PC who might want to debate the issues, and as one Councillor said, disrupt the business of the PC. Where is democracy in all of this? If your face doesn't fit, then we don't want you.....

I became a Parish Councillor in January 2016 by calling an election after a Councillor resigned. I have voted against the NDP at every stage since then, warning the PC that they are at risk of the NDP failing due to poor process. I was informed that the content was now what was important and not the process--- I can't believe that you will take this view. I hope you will insist that the NDP group re-visit their consultation and will reject this current Draft NDP.

Yours

Bruce Herriot

Sent from my iPhone



The Coal
Authority



200 Lichfield Lane
Berry Hill
Mansfield
Nottinghamshire
NG18 4RG

Tel: 01623 637 119 (Planning Enquiries)

Email: planningconsultation@coal.gov.uk

Web: www.gov.uk/coalauthority

For the Attention of: Neighbourhood Planning and Strategic Planning teams
Herefordshire Council

[By Email: neighbourhoodplanning@herefordshire.gov.uk]

26 October 2016

Dear Neighbourhood Planning and Strategic Planning teams

Cradley Parish Council Neighbourhood Development Plan

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.

Should you have any future enquiries please contact a member of Planning and Local Authority Liaison at The Coal Authority using the contact details above.

Yours sincerely

Rachael A. Bust *B.Sc.(Hons), MA, M.Sc., LL.M., AMIEnvSci., MInstLM, MRTPI*
Chief Planner / Principal Manager
Planning and Local Authority Liaison

Latham, James

From: CPRE Herefordshire Admin <admin@cpreherefordshire.org.uk>
Sent: 28 September 2016 11:18
To: Neighbourhood Planning Team
Subject: RE: Cradley Regulation 16 Neighbourhood Development Plan consultation

Dear James

Thank you for your email, which I have forwarded to volunteers for comment

Kind regards
Barbara

Barbara Bromhead-Wragg
CPRE Herefordshire Administrator
www.cpreherefordshire.org.uk

This email is confidential and may also be legally privileged. If you have received it in error, please notify us immediately by reply email and delete this message from your system. Views expressed in this message are those of the sender and may not necessarily reflect the views of CPRE Herefordshire. This email and its attachments have been checked by AVG Anti-Virus. No virus is believed to be resident but it is your responsibility to satisfy yourself that your systems will not be harmed by any of its contents.

From: Neighbourhood Planning Team [<mailto:neighbourhoodplanning@herefordshire.gov.uk>]
Sent: 28 September 2016 10:35
Subject: Cradley Regulation 16 Neighbourhood Development Plan consultation

Dear Consultee,

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

The plan can be viewed at the following link: <https://www.herefordshire.gov.uk/planning-and-building-control/neighbourhood-planning/neighbourhood-areas-and-plans/cradley>

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

The consultation runs from 28 September 2016 to 9 November 2016.

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

If you wish to be notified of the local planning authority's decision under Regulation 19 in relation to the Neighbourhood Development Plan, please indicate this on your representation.

Kind regards

James Latham
Technical Support Officer
Neighbourhood Planning and Strategic Planning teams
Herefordshire Council
Planning Services
PO Box 230

8th November 2016

Neighbourhood Planning Team
Planning Services
PO Box 230
Hereford
HR1 2ZB

Dear Sirs,

Cradley Neighbourhood Development Plan: Regulation 16

I believe Cradley PC's draft Neighbourhood Development Plan should be rejected since it is unreliable and would damage the character of the village. In particular:

- it is based on a flawed consultation during which parishioners were invited to answer loaded, incomplete and inconsistent questions;
- its convenor and other councillors were prejudiced, failed to acknowledge conflicts of interest and exploited the process to oppose a major community initiative;
- its main goals seem to be preventing homes being built and enforcing a rigid separation between the component parts of a single beautiful village.

Detailed arguments follow. By way of introduction, I live in Mathon, our children went to Cradley School and I have strong ties to the village. While those 'ties' include chairing Cradley Village Players, I obviously write here in a personal capacity.

1. A convenient starting point is a meeting in Cradley Church on 4th August 2014 when Cllrs Alan Eldridge and Dr Sarah Herriot outlined options for a new 'Heart of the Village'. In its final form, the idea is to create a community-owned shop and café and outdoor play area on a rural site in the centre of the village which borders Cradley Brook. This has been given to the community by Mrs Heather Morgan on behalf of a family trust and is now generally called Morgan's Field.

Minutes by the Clerk to the Parish Council confirm that many of those present welcomed the plan while some had legitimate concerns or questions. Just two people strongly opposed it: Cllr Tanya Lloyd-Jones and her husband Malcom 'Mac' Brown. Though they did not mention this fact, they live a few hundred metres downstream of the site and appear to believe that the project might affect the flow of the stream. It became clear at that meeting that Cllr Lloyd-Jones wants to preserve the village from any change - a belief that underpinned her approach to the NDP. Bizarrely, she said a plan to park cars under trees would make the area look 'urban', though such car parks are found in most Forestry Commission picnic sites and elsewhere.

Despite her hostility to a community initiative that would clearly be reviewed by the NDP, Cllr Lloyd-Jones felt it appropriate to continue leading the process, neither declaring her opposition nor acknowledging that the location of her home was a pertinent factor. Her attitude to those involved with HoV was ill-tempered, while her husband masterminded an aggressive and ill-informed campaign of opposition [see 8].

2. In November 2014 Cradley Parish Council asked Carly Tinkler CMLI to conduct a landscape appraisal of parts of the village close to the settlement boundaries. She was not, however, briefed by the NDP group or the parish council but at a private un-minuted meeting with Lloyd-Jones and council chair Christopher Lowder at Lloyd-Jones' house. Tinkler later presented a proposal which she herself had drafted.

Tinkler said her aim was to assess the suitability of around 80 sites for house building. Among the very few judged to have such potential were four which adjoin the settlement boundary and lie outside both the Area of Outstanding Natural Beauty (AONB) and the so-called 'strategic gap' [see 4]. Three of these four sites are owned by Cllr Lloyd-Jones and her husband. Although, like all councillors, Lloyd-Jones has declared an 'interest' in her house, she has at no stage acknowledged owning land whose value could increase significantly should the NDP be approved. We cannot know whether Cllr Lloyd-Jones and her husband hope to profit from a possibly un-intended consequence of a report which she helped commission, but her failure to be open casts further doubt on the legitimacy of the NDP project and her leadership of it.

3. Landscape is the only matter formally studied during the NDP process: the council has conducted no assessment of economic or social need, giving the impression that its goal is to limit or prevent new house building (the PC chair wrote: 'don't forget - the NDP is our strongest line of defence against developers and unfettered and ugly urbanisation in and around our beautiful village').

4. The 'strategic gap'. Like green belts, strategic gaps are now part of the language of planning, denoting parcels of land between separate cities, towns or villages, mainly in built-up areas, whose inhabitants wish to *keep* them separate. I know of no other case of the term being applied to land *within* a single community - especially one wholly surrounded by open countryside. But it has been used to describe an area of varying size between the two constituent parts of Cradley which some likewise hope will prevent the village from 'coalescing' (*ie* becoming a coherent whole).

The term came into use in the 1990s amid fears too much new building might make a rural village feel like a small town and was described in the first of two Village Design Statements as 'the single most significant space in the village and central to its character'. Those who drafted the document have explained that they used this dramatic phrase for the sole purpose of opposing an application to build houses on what is generally known as The Beanfield. It was never intended to *define* the 'gap' as has subsequently been argued by the Parish Council. Moreover the 2004 Village Design Statement *also* said that while houses should not be built in the 'gap', facilities offering 'community benefit' should be considered.

5. In Summer 2015, the Parish Council consulted parishioners about the NDP. Several draft questionnaires were circulated to people and groups with relevant interests. These drafts differed in length and emphasis but each asked for views on how the council should respond to two 'community' projects (a new sports field and the Heart shop and café) and three commercial housing applications. At the last minute, the PC decided not to use *any* of these drafts but to distribute a heavily edited version which mentioned the sports field, omitted the housing plans and excluded HoV but asked whether people favoured a 'second shop' in addition to the existing Cradley Butchery. It also sought views on 'development' [sic] in the so-called Strategic Gap. When the HoV team argued all this was unfair and would cause confusion, Cllr Lloyd-Jones told them the final draft could not be changed. HoV therefore decided to do their own survey to clarify attitudes to their project as specified.

Responses to the PC questionnaire showed that a majority welcomed the idea of a second shop and café as well as the sports field - a finding matched by HoV's survey in which 84 per cent supported the Heart on Morgan's Field - but *also* revealed that most respondents wanted to keep the 'gap' free from 'development'.

Interpreting these results reliably is hard since the compromise questions were so poorly-worded: the location and extent of the 'gap' was not defined, the meaning of 'development' in this context was unexplained and the nature or location of a 'second shop' was left entirely open. Many people, including members of the Heart team themselves, voted against 'development' in the 'gap' assuming that, in line with the Landscape Assessment, it meant housing and did not cover community projects like their own. Others assumed the 'gap' referred only the Beanfield and did not include Morgan's Field. This so-called consultation caused confusion rather than clarity and further damaged relations between the PC and HoV. It is also noteworthy that while the PC continually claims a 'majority' of residents oppose development in the 'gap', the number of people who gave this answer was actually 211 - around 12% of the population of Cradley or 10% of the population of Cradley, Mathon and Storridge combined - a tiny *minority* of the total.

6. When the Parish Council appointed a planning consultant to guide the work of the NDP they controversially chose a professional colleague of Cllr Lloyd-Jones, prompting concerns about his objectivity. He compounded confusion over the 'gap' by arguing it was impossible to frame a policy which would allow HoV to be built there without opening the door to commercial development. This argument - for which no evidence has been offered - has been a cause of additional acrimony.

7. In June 2015, after attacks by Cllr Lloyd-Jones and others, Cllr Sarah Herriot resigned from the PC. When her husband Dr Bruce Herriot offered himself as a replacement, he should have been appointed without election as there was no other candidate. However the council chair copied councillors with a message to Dr Herriot from his 'official' email address that included untrue and malicious allegations which are the subject of a formal complaint to Herefordshire Council's Monitoring Officer. In response, councillors voted not to co-opt Dr Herriot but later reversed this decision and elected him as a councillor. Though council elections are not part of the NDP process, it seems clear that these events related to the support shown by both Herriots for the HoV and are further evidence of prejudice against the project.

8. In Spring 2016, the Heart team sent Herefordshire Council a planning application. The prompted two unprecedented developments. First, 'Mac' Brown, husband of the convenor of the NDP group, launched a violently hostile campaign which included the wide distribution of a letter he hoped parishioners would use as the basis for objections to the scheme. This letter claimed *inter alia* that:

- flood risk had been inadequately addressed and HoV's analysis was contrary to national policy requirements. **This was untrue.** It is well known that parts of the site sometimes flood but the Heart building is above predicable flood levels and the project will have no impact on flooding up or downstream. Data provided on this subject was accurate and appropriate for a project of this scale. The Environment Agency have no concerns about the project from a flood perspective;

- the site suffered from the 'probable occurrence of sewage contamination' and was not suitable for a children's recreation area. **This was untrue.** A problem with the sewage treatment plant on Kingsbridge was fixed in 2013 and if it should recur Severn Trent are legally obliged to repair it. The building will be connected to mains drainage while rainwater will be channelled to an attenuation pond in a new community orchard;

- HoV would 'set a set the precedent for development in the Strategic Gap contrary to long standing village objectives and cause urbanisation of a site that has been identified as an "important space" specifically to retain the rural character of the village'. **This was untrue.** More people supported HoV than opposed development in 'gap', while, as described, statistics from the PC survey are unreliable. The project has no link to housing or 'urbanisation'. As now, Herefordshire Council and the PC will decide what, if any, building is allowed in the 'gap' or elsewhere;

- the application should have included a landscape and visual impact assessment. **This was untrue.** LVIA's are required for major developments but not for projects of this size. Planning authorities may *request* them in other cases but Herefordshire Council did not do so in this instance;

- the project would unfairly affect existing businesses. **This is at best debatable.** Unlike Cradley Butchery, HoV will be a shop *and* café and has a very different financial model as it will be owned by a Community Benefit Society and any profit will be returned to the project or given to other community groups. Moreover the outcry that greeted the closure of Cradley's previous shop and Post Office indicates long-standing public and council support for the presence of two shops in the village, while a prominent councillor argued in response to a recent planning application that, as one of the county's largest villages, Cradley has 'a paucity of retail and recreational facilities [having] only one small butchers shop' and that 'a community of several hundreds of souls is very much in need of new facilities [as] the village stores and PO closed three years ago'.

8. The second 'development' was the launch of a website claiming to provide 'the truth about HoV'. This negative and error-strewn site was 'hosted' on the website of the Deputy Chair of the Parish Council, Cllr Ken Nason. Comparisons with other sites set up by Cllr Nason and with articles and emails composed by him strongly suggest he was *also* responsible for its content and design. This can't be proved, but it was unwise for a senior councillor to involve himself, even peripherally, with such contentious material. Others involved have refused to reveal their identity.

9. In Summer 2016 the NDP published a draft report and sought comments from the community, Herefordshire Council and others. The draft proposed to extend the 'gap' to embrace virtually *all* the land between the two parts of Cradley and said the area should be 'protected from all development except that which may be required to mitigate flood risk' which would, of course, include HoV.

NDP's consultant said that of 50 people who mentioned the subject there was 'an even split between those that do not want any development in the strategic gap at all and those that think that Morgan's field should be excluded to allow a community shop/café to be developed or that there should be no protection of the Strategic Gap'. For their part, Herefordshire's planning team responded that the 'gap' policy was 'much too restrictive' and felt it might not be required at all given that the existing settlement boundaries 'provide sufficient protection against development of a scale that could threaten any future coalescence of the two settlements'. The County Council therefore suggested that 'development' be restricted to:

- that reasonably required for agricultural and forestry purposes;
- public open space;
- that needed for community facility or facilities.

10. Using these inputs, the NDP team made further changes before submitting a 'final' version to Herefordshire Council. Some are welcome. For example, the plan no longer 'quarantines' all the space between the two constituent parts of the village.

On three matters, however, the draft is unsatisfactory and should be rejected:

- it ignores both Herefordshire's recommendation that development of 'community facilities' should be permitted in the 'gap' *and* the fact that half of those who commented on the draft wanted Morgan's Field excluded from it, proposing to allow only that needed for agriculture or flood prevention. **Since this policy seems to be designed explicitly to oppose the HoV scheme, it should be changed to permit 'community' buildings *in* or to exclude Morgan's Field *from* the 'gap';**

- most of those who completed the PC questionnaire said they wanted the NDP to restrict the number of future houses built in the village. Of those who gave this answer, the majority said they favoured developments of between five and ten houses. The draft NDP, however, sees virtually no opportunity for further development of *any* scale, meaning that those who wish to live in the village - not least its young people - are unlikely to be able to find homes;
- the draft refers continuously to 'east' and 'west' Cradley, arguing the terms are 'local usage'. Longstanding residents confirm that they have never used these words and their inclusion appears to be a crude attempt to formalise the separation of the village into two distinct parts.

In a booklet on conducting NDPs, the Local Government Association says councillors must ensure 'objectors' comments [are] taken seriously and dealt with in a transparent/logical way'; that evidence used to support the NDP should be 'robust', 'demonstrate the needs of the community in an objective way' and 'be collected in a transparent and fair way'; and that councils should 'maintain an even handed approach in ... statements and publications'.

Sadly none of these things has happened in Cradley. The NDP process has been characterised by aggression, partiality and unfairness. It has not only sought to divide the village physically but has caused division and unpleasantness among village people. Those responsible should be embarrassed. Someone has to find some way to pick up they pieces. That won't be easy, but insisting the draft be re-written in a fair and open manner would be a good start.

Yours faithfully,

David Robertson

Latham, James

From: Norman Ryan <Ryan.Norman@dwrcymru.com>
Sent: 04 November 2016 12:14
To: Neighbourhood Planning Team
Cc: Evans Rhys
Subject: RE: Cradley Regulation 16 Neighbourhood Development Plan consultation

Dear Sir/Madam,

I refer to the below consultation and would like to thank you for allowing Welsh Water the opportunity to respond.

We provided a response to the Regulation 14 consultation and I can confirm that we have nothing further to add at this stage.

If you require any further information, please let us know.

Regards,



Ryan Norman

Forward Plans Officer | Developer Services | Dŵr Cymru Welsh Water

Linea | Cardiff | CF3 0LT | T: 0800 917 2652 | Ext: 40719 | www.dwrcymru.com

Have you seen Developer Services new web pages at www.dwrcymru.com? Here you will find information about the services we have available and all of our application forms and guidance notes. You can complete forms on-line and also make payments. If you have a quotation you can pay for this on-line or alternatively by telephoning 0800 917 2652 using a credit/debit card. If you want information on [What's new in Developer Services?](#) please click on this link.

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

From: Neighbourhood Planning Team [<mailto:neighbourhoodplanning@herefordshire.gov.uk>]

Sent: 28 September 2016 10:35

Subject: Cradley Regulation 16 Neighbourhood Development Plan consultation

***** External Mail *****

Dear Consultee,

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

The plan can be viewed at the following link: <https://www.herefordshire.gov.uk/planning-and-building-control/neighbourhood-planning/neighbourhood-areas-and-plans/cradley>

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

The consultation runs from 28 September 2016 to 9 November 2016.

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

If you wish to be notified of the local planning authority's decision under Regulation 19 in relation to the Neighbourhood Development Plan, please indicate this on your representation.

Herefordshire Council
Neighbourhood Planning
PO Box 230
Blueschool House
Blueschool Street
Hereford
HR1 2ZB

Our ref: SV/2010/103979/AP-
66/IS1-L01

Your ref:

Date: 08 November 2016

F.A.O: Mr. J Latham

Dear Sir

CRADLEY REGULATION 16 NEIGHBOURHOOD DEVELOPMENT PLAN

I refer to your email of the 28 September 2016 in relation to the above Neighbourhood Plan (NP) consultation. We have reviewed the submitted document and would offer the following comments at this time.

As part of the recently adopted Herefordshire Council Core Strategy updates were made to both the Strategic Flood Risk Assessment (SFRA) and Water Cycle Strategy (WCS). This evidence base ensured that the proposed development in Hereford City, and other strategic sites (Market Towns), was viable and achievable. The updated evidence base did not extend to Rural Parishes at the NP level so it is important that these subsequent plans offer robust confirmation that development is not impacted by flooding and that there is sufficient waste water infrastructure in place to accommodate growth for the duration of the plan period.

The submitted plan states that "it does not propose to allocate any sites for housing" and we would therefore, whilst we welcome the inclusion of a Flood Risk Policy, offer no bespoke comment at this time.

Yours faithfully

Mr. Graeme Irwin
Senior Planning Advisor
Direct dial: 02030 251624
Direct e-mail: graeme.irwin@environment-agency.gov.uk

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

Latham, James

From: Giselle Edgar
Sent: 08 November 2016 21:32
To: Neighbourhood Planning Team
Subject: Cradley and Storridge parish Neighbourhood Development Plan

I would like to express appreciation for the amount of work which is done in Cradley and Storridge by many groups to improve village life.

The NDP has been a huge undertaking and thanks go to those who have spent a great deal of time on this project.

I would just like to submit a comment about the CSNDP Policy 8; Strategic Green Gap, which now says :

"A Strategic Green Gap, as depicted on the proposals map, is defined between east and west Cradley. Development in it, except for open public space, and that reasonably required for agricultural and forestry or to mitigate flood risk, will not be supported."

When the NDP group consulted the village on this issue the questionnaire used (no map defining the SGG supplied, no definition of " development", no mention that the Heart of the Village project was proposed for the SGG) did not allow for a clear identification of parish views. A clearer questionnaire concerning the HOV project was dropped at the last minute.

The NDP group accepted the recommendations of Hereford Council at Regulation 14 to allow development in the SGG for forestry and agricultural purposes but turned down the suggestion to allow community development in the SGG. This seems short sighted, as our villages may well benefit from community use of this space now or in the future.

Yours faithfully,
Giselle Edgar

Latham, James

From: Welford, Holly
Sent: 17 October 2016 16:32
To: Neighbourhood Planning Team
Subject: Representation regarding Cradley NDP

Good afternoon,

I wish to make a representation regarding the Cradley and Storridge parish Neighbourhood Development Plan, in line with provisions around Regulation 16.

In particular I wish to note the CSNDP Policy 8; Strategic Green Gap now says :

"A Strategic Green Gap, as depicted on the proposals map, is defined between east and west Cradley. Development in it, except for open public space, and that reasonably required for agricultural and forestry or to mitigate flood risk, will not be supported."

This issue, when raised with the village, was not clear about the exact boundaries of the strategic gap, did not define development, and did not mention that a community project was currently proposed for the area. It is my humble opinion this questionnaire was designed to be biased against the HoV project, simply due to the language that was used, as well as the fact that an agreed upon questionnaire, that had gone through both the parish council and the HoV group, was dropped at the last minute, leaving this less clear questionnaire to be cobbled together with input only from a certain group of people within the village.

Furthermore, I would consider it a grave president to define community projects, run by the community, for the community, under the same umbrella term of 'development' that is used to describe large housing estates built by builders for the benefit of builders. I do not consider that a community project of this nature; one small building, built using local labour and materials and designed to be environmentally responsible, would be in any way at odds with the values the strategic gap is promoting, namely the conservation and protection of our local natural beauty. Indeed, these values are completely aligned with the ethos of the HoV project, which aims to bring the village together in a place of natural beauty so that we may not only appreciate our fellow villagers, but also our incredible surroundings. Indeed, should the HoV project go ahead, majority of the field would remain as open space, available for the enjoyment of all.

It is the NDPs acceptance of the council's recommendations at regulation 14 to allow the area to allow development on the field for forestry and agricultural purposes that I find particularly curious. Surely, in a field with widely touted flooding issues, any removal of the trees along the bank (the only trees in the field) would weaken the soil, causing more silt to enter the river, thus increasing the prospect of flooding. Further, development for agriculture implies that a farm building could be built on the site, something likely of similar size to the proposed HoV project, but with far less considerations around environmental responsibilities, and whose only beneficiaries would be cows. It occurs to me that the proposed HoV 'development' would do a far greater service to the surrounding area and the conservation of the natural beauty present in the strategic gap, than cows, barns and forestry.

Many thanks for your consideration of the above in this coming period.

Kind regards,

Holly

Holly Welford | KPMG

Audit Assistant



Historic England

WEST MIDLANDS OFFICE

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

Direct Dial: 0121 625 6887

Our ref: PL00041009

3 November 2016

Dear Mr Latham

CRADLEY NEIGHBOURHOOD PLAN - REGULATION 16 CONSULTATION

Thank you for the invitation to comment on the Regulation 16 Neighbourhood Plan.

As stated in our consultation letter of the 22nd April 2016 in response to the Regulation 14 consultation:

“Historic England are supportive of the Vision and objectives set out in the Plan and the general content of the document, particularly its’ emphasis on local distinctiveness and the maintenance of historic rural character”.

We are also gratified to note that, as suggested, the Village Design Statement and the Landscape Assessment (Tinkler 2015) are now referenced in Policy text, so that developers are clear that they are required to take account of them when developing their proposals.

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

I hope you find this advice helpful.

Yours sincerely,

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

cc:



THE AXIS 10 HOLLIDAY STREET BIRMINGHAM B1 1TG

Telephone 0121 625 6870
HistoricEngland.org.uk





Historic England

WEST MIDLANDS OFFICE



THE AXIS 10 HOLLIDAY STREET BIRMINGHAM B1 1TG

Telephone 0121 625 6870
HistoricEngland.org.uk



Historic England is subject to the Freedom of Information Act, 2000 (FOIA) and Environmental Information Regulations 2004 (EIR). All information held by the organisation will be accessible in response to an information request, unless one of the exemptions in the FOIA or EIR applies.

Latham, James

From: Helen Wilkes <Helen.Wilkes@hca.gsi.gov.uk>
Sent: 10 October 2016 16:11
To: Neighbourhood Planning Team
Cc: Carol Baker; Jimmy Lindqvist; HCAEnquiriesTeam
Subject: Cradley Neighbourhood Plan

Thank you for consulting the Homes and Community Agency on the Cradley Draft Neighbourhood Development Plan.

The Agency supports the delivery of housing to meet identified local needs and supports the preparation of Neighbourhood Plans where they are clear in promoting development.

The Agency is not a landholder within the boundary of the Neighbourhood plan and as such will not be formally submitting a response.

Kind regards,

Helen Wilkes CIHCM
Senior Area Manager
Midlands West Area Team
Homes & Communities Agency
T: 0121 2349963 ext 2963
M: 07747 564065
www.homesandcommunities.co.uk

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HELP SAVE NATURAL RESOURCES. THINK BEFORE PRINTING THIS EMAIL
Homes and Communities Agency; Arpley House, 110 Birchwood Boulevard, Birchwood, Warrington, WA3
7QH (reg.address for legal documents) 0300 1234 500 mail@homesandcommunities.co.uk VAT no: 941
6200 50

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Latham, James

From: James Ashton
Sent: 17 October 2016 23:01
To: Neighbourhood Planning Team
Subject: Cradley and Storrige Parish Neighbourhood Development Plan: Policy 8 - Strategic Green Gap

Dear Sir or Madam,

My wife and I would like to register a formal complaint / representation regarding policy 8 – The Strategic Green Gap – in the Cradley and Storrige Neighbourhood Development Plan.

The process to implement this policy is clearly flawed and biased for the following reasons:

1. The village was consulted via questionnaire, this made reference to the “Strategic Gap”, however, there was no definition as to what this gap was or map to identify it. Further to this, throughout the questionnaire, the parish council referred to how they could best “protect” the community from development. Such language suggests an answer (who doesn’t want to be “protected” – even if you don’t know what from) and was manipulative in its wording.
2. The questionnaire used the word “development, without defining what this would include – housing, community facilities, agricultural buildings? They have now interpreted the word within their policy to allow forestry and agricultural development, but not community development. No reason is given.
3. Even though there was an established proposal within the village, known as “The Heart of the Village”, which the Parish Council was aware of, no effort was made to communicate this to the wider community in order to seek a broader, democratic opinion on such a proposal. Those behind the Heart of the Village proposal sought to work with the Parish Council and assisted in drawing up a fairer, clear and unambiguous questionnaire to clarify popular opinion within the village. However, although they initially appeared to be open to this proposal, the Parish Council changed their minds at the last minute and instead used their own flawed questionnaire.
4. The Parish Council saw fit to accept the recommendations of Hereford Council at Regulation 14 in relation to allowing forestry and agricultural development on the land, but when the council proposed that development be allowed for community purposes this was refused with no reason given.

In summary; the behaviour of the Parish Council in this matter beggars belief in the way that, notwithstanding some strong internal challenge, they have sought at all costs to avoid consulting properly with the community in order to establish whether there should be the opportunity to build a community owned facility in the area they insist on calling the “strategic gap”.

I would therefore respectfully ask that this element of the plan is not accepted until such a time as there has been proper, fair and transparent community consultation which provides parishioners with all of the necessary information to make a clear and informed decision.

Best wishes,

James Ashton & Alessandra Sommi

Herefordshire Council

Comment on a proposed neighbourhood area

If you would like to make a comment about an application to designate a neighbourhood area or to a submitted Neighbourhood Development Plan, please complete the form below, indicating which area or plan you are commenting on. Representation must be made within six weeks of the date the area or plan was first publicised.

If you would like to know if a neighbourhood area has been designated or a Neighbourhood Development Plan is in production near you, please see the [Neighbourhood areas and plans page](https://www.herefordshire.gov.uk/planning-and-building-control/neighbourhood-planning/neighbourhood-areas-and-plans) (<https://www.herefordshire.gov.uk/planning-and-building-control/neighbourhood-planning/neighbourhood-areas-and-plans>).

PLEASE NOTE: This form is solely for commenting on proposed neighbourhood areas and submitted Neighbourhood Development Plans. If you wish to comment on a planning application please visit the [planning application search section](https://www.herefordshire.gov.uk/planning-and-building-control/development-control/planning-applications) (<https://www.herefordshire.gov.uk/planning-and-building-control/development-control/planning-applications>).

To make a comment, you must first provide a valid address.

Address *

First name *

Last name *

Which plan are you commenting on? *

Comment type

Please see sheet 2.

Your comments *

Please see attached letter.

Submit

November 3rd 2016

Neighbourhood Planning Department,
Herefordshire Council,



Dear Sirs or Mesdames,

Re: Cradley and Storrige Neighbourhood Development Plan

(Policy no. 8)

We wish to take issue with the whole idea of a Strategic Green Gap (SGG) as outlined in the proposals for the CSNDP.

1. A Strategic Green Gap suggests – obviously - that there is a strategy. But what precisely is that strategy? We have never seen it outlined. Is it the idea that the two halves of the village be kept permanently apart? How strange if so.
2. Any idea that the SGG between east and west Cradley is vital and needs to be set in stone is surely ridiculous. Why do we say this?
3. Because Cradley is a small village which just happens to have grown up in two parts. So surely the efforts implied in in the NDP should be made to bring those two halves together not establish a permanent divide; we are not talking about a large conurbation here! Yet the SGG is proclaimed as being necessary to do just that, maintain a gap! This is patently absurd, so much so that one has to wonder whether there are vested interests of some sort or other which WANT to prevent any linkage.

[As it happens there is currently a group which is desirous of doing something in a small way to link the two halves together and you will almost certainly have heard of these proposals. They involve the creation of a small café and shop built unobtrusively between the two halves of the village, though obviously above the Cradley Brook Floodplain. Though we are not connected with this group we do applaud their efforts to bridge the divide between the two halves of the village.]

Yours sincerely.....



John Gilbert

Elizabeth E.L.Gilbert (Mrs)

Latham, James

From: John Turner
Sent: 12 October 2016 11:35
To: Neighbourhood Planning Team
Subject: Response to regulation 16 Cradley NDP

I object to the policy in "CSNDP 8 strategic gap". Community development should not be excluded from the so called strategic gap. I would refer you to Herefordshire Planning Department Delegated report on P162155/0 Church Stile Farm planning application . On page 37 - a précis. "If a new shop was required , suggested sites are either on the B4220 or on an appropriate location in the countryside between the two halves of Cradley. This is not in an area of Outstanding Natural Beauty and is not recognised as being of importance from a landscape perspective. Furthermore it would be more readily accessible for the majority of residents." This would therefore seem to suggest that it would be an ideal site for a possible future (community) shop. My personal opinion is that the two halves of the village should be joined together and so make for a complete village with an easy, central, direct access between the two. However , in this submission I suggest that the NDP should allow limited community development in the strategic gap and not be limited to forestry and agriculture. Community development in the strategic gap is also suggested by the Planning Services Development Management in their response to CSNDP at the Regulation 14 consultation (appendix 6c. page 97) but not adopted by the NDP with no reason stated. John Turner,

Sent from my iPad

Latham, James

From: Miles Meager
Sent: 08 November 2016 21:25
To: Neighbourhood Planning Team
Subject: Cradley neighbourhood development plan

I'd like to provide comment on the Cradley neighbourhood development plan.
There are two concerns I'd like to raise.

1. Regarding roads, there is no mention of the dangerous stretch of road and the completely inappropriate 60mph speed limit between the Red Lion pub and the Bosbury road turn on the A4103. There are numerous bends and exits off this stretch of road and have been many accidents on this bit of road too. In the last two years there were at least 5 serious that required emergency services to attend. There are several holes in the hedge that are testament to the number of accidents and it is extremely lucky that no one has died. The speed limit on this stretch of road should be reduced and signs put up to warn of concealed entrances plus no overtaking. Every day residents on this stretch of road will hear the screech of brakes and horns being used as residents seek to exit or get onto the road including customers to the Blue Ginger Gallery. It is extremely dangerous.
2. The wording over the development of the strategic gap in the questionnaire created a misleading response. There should have been greater attention to what types of development residents would accept or reject. As it is a 'strategic' gap it seems that the land should be considered to be strategic to the needs of the community. Preventing any kind of building development could prevent community projects that may be in the interests of the village. What sort of developments could occur should be open to greater consultation. The questionnaire question did not give residents an opportunity to express what they would like in considering strategic development in this area.

Thanks

M Meager

Cradley Parish Council Neighbourhood Development Plan (NDP)
Regulation 16 consultation

Comments submitted by the Malvern Hills AONB Unit

We recognise that the role of Herefordshire Council at this stage is not to provide detailed observations on the content of the plan but to provide constructive comment. It may be that some of the items outlined below are not ones which Herefordshire Council is able to take a view on but we provide them here for the sake of completeness.

General comments

It is clear that from the consultation responses and the objectives contained in the NDP that the people of Cradley and Storridge value the landscape and environment of the parish very highly. In our comments on the Regulation 14 draft Cradley NDP (dated 27th April 2016) we expressed the view that a more detailed policy framework would help to make the NDP a more effective tool in addressing the land use and development issues that lie ahead for the parish. This is desirable because, although the Malvern Hills AONB Management Plan is a material consideration in the planning process, this document and the guidance which aims to amplify its content is not part of the statutory planning framework.

Having read through the Regulation 16 draft it appears that relatively little has changed since the last iteration. Therefore, we believe that the plan represents something of a missed opportunity to lend further statutory support to the conservation and enhancement of natural beauty at the local level. Some examples of this are as follows:

- No specific policy or text on the siting and design of agriculture/ agricultural development.
- No specific policy or text on the siting and design of horse related development.
- No specific policy or text on renewable energy development.

One change from the Regulation 14 draft is that Policy CSNDP 9 does now address lighting, stating that proposals for street or flood lighting will not be supported other than where public safety overrides other concerns. However, the text fails to set out the type of lighting or standards that the Parish Council wishes to see utilised when lighting is required, for example, with reference to criteria set down by the International Dark-Sky Association.

A further welcome change from the Regulation 14 draft is the text reference to green infrastructure and to the importance of a broader approach to nature conservation. However, the relevant policy (CSNDP 6) deals only with Local Wildlife Sites and as such appears to add very little to the practical delivery of green infrastructure.

Factual corrections

- The Malvern Hills AONB Partnership produces the AONB Management Plan (not the AONB Unit).
- The current document covers the period 2014-2019 not 2013-2018.
- The range of guidance produced by the AONB Partnership now includes guidance on the selection and use of colour in development.
- End Hill is the northernmost of the Malvern Hills.

Evidence base

Much of the local evidence base detailing what is special about the parish is not contained in the NDP or its appendices. Instead, it is found in a number of pre-existing documents such as the Village Design Statement, Parish Plan and AONB guidance. In general terms it would be useful for Herefordshire Council to confirm that the isolation of the NDP from this evidence base will not in any way prove detrimental to the plan's objectives to give priority to local distinctiveness and to protect and enhance the landscape and biodiversity.

Policy CSNDP 2: Housing Provision

We consider that this policy needs to be amended to clarify that it applies only to sites that are deemed to have a capacity of moderate as a minimum. It should not apply to sites that, for example, have a capacity of low-moderate.

Policy CSNDP 3 Economic Development

It is possible that the intention of this policy is to support tourism development involving the conversion of redundant buildings which is appropriate to the special character of the Parish. It would be useful if this could be clarified.

Para 8.3 There seems to be uncertainty here about whether local listing does or does not require the owner's consent, and this uncertainty appears to inform the text of the NDP which states that it is not proposed to identify any buildings for local listing. We believe it is essential that Herefordshire Council provides clarity on such points so that Cradley Parish Council can produce policy and/or text in the light of full information. Without wishing to question the Parish Council's right to decide on such matters for itself, the policy of local listing is supported by Historic England and so is clearly considered to have merit at the national level. It is perhaps also worth noting that the current Malvern Hills AONB Management Plan supports an improvement to the evidence base of locally important heritage assets (Policy HP2). Does this AONB Management Plan policy therefore conflict with the NDP?

Design policy - CSNDP 9

The policy on design is a critical one. We feel it is essential that Herefordshire Council provides clarity on the issue of the weight which can be expected to be given to it. Policy CSNDP 9 states that proposals which take appropriate account of the

recommendations of the Village Design Statement (VDS) will be supported. Does this mean, through association, that the VDS will effectively form part of the statutory planning framework or not? We have been led to believe that it is not possible for an NDP simply to refer to a document in this way and expect it to have statutory status. If this is true, it is important that people understand this fact, and recognise that this part of Policy 9 has much less weight than it might appear to have.

On a related theme, it is gratifying to read in the NDP text that the Parish Council will take full account of the AONB guidance documents in its response to planning applications. However, it is our understanding that these words will add no weight at all to the status or significance of these documents when it comes to a planning application or a Public Inquiry. It would be very useful for Herefordshire Council to confirm whether this is indeed the case. If so, it would seem important that this is clearly communicated to the Parish Council and local community.

Section 9 Transport and Communications

There is no policy linked to this section. The plan recognises that the amount and size of road signage can have a significant effect on the quality of the landscape. It also states that the Parish Council will seek to ensure that the number of signs, and their size, are kept to a minimum consistent with providing adequate directions and with road safety, especially in the AONB. However, no policy is provided to affect this. How much weight, therefore, can be attributed to the text alone in this section? A policy referencing use of the AONB Guidance on Highway Design would be likely to meet the Parish Council's aspiration, if referencing other documents is allowable (see Policy CSNDP 9 above).

Policy 10 Conservation Area

It is unclear what this policy adds to the protection already in place for Conservation Areas.

End

Monday, 17 October 2016

4 November 2016

Dear Sir / Madam

Cradley Neighbourhood Plan Consultation SUBMISSION ON BEHALF OF NATIONAL GRID

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

About National Grid

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

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

Specific Comments

An assessment has been carried out with respect to National Grid's electricity and gas transmission apparatus which includes high voltage electricity assets and high pressure gas pipelines, and also National Grid Gas Distribution's Intermediate and High Pressure apparatus.

National Grid has identified that it has no record of such apparatus within the Neighbourhood Plan area.

Gas Distribution – Low / Medium Pressure

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

Key resources / contacts

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

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

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



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

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

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

Robert Deanwood
Consultant Town Planner

n.grid@amecfw.com

Spencer Jefferies
Development Liaison Officer, National Grid

box.landandacquisitions@nationalgrid.com

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

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

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

Yours faithfully

[via email]

Robert Deanwood
Consultant Town Planner

cc. Spencer Jefferies, National Grid

Date: 08 November 2016
Our ref: 197308
Your ref: Cradley NDP



James Latham,
Neighbourhood Planning and Strategic Planning Teams,
Herefordshire Council

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

BY EMAIL ONLY

Dear Mr Latham,

Cradley Regulation16 Neighbourhood Development Plan consultation

Thank you for your consultation on the above dated 28/09/2015.

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.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

Natural England has no further comment to make on this draft neighbourhood plan.

However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan.

For clarification of any points in this letter, please contact Tom Amos on 02080 260961. For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours sincerely

Tom Amos
Consultations Team

Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

Natural environment information sources

The [Magic](http://magic.defra.gov.uk/)¹ website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, National Parks (England), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available [here](#)².

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)³. Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](#)⁴.

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty** (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](http://magic.defra.gov.uk/)⁵ website and also from the [LandIS website](http://www.landis.org.uk/)⁶, which contains more information about obtaining soil data.

Natural environment issues to consider

The [National Planning Policy Framework](https://www.gov.uk/government/publications/national-planning-policy-framework--2)⁷ sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/)⁸ sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

¹ <http://magic.defra.gov.uk/>

² <http://www.nbn-nfbr.org.uk/nfbr.php>

³ <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

⁴ <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

⁵ <http://magic.defra.gov.uk/>

⁶ <http://www.landis.org.uk/index.cfm>

⁷ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

⁸ <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)⁹), such as Sites of Special Scientific Interest or [Ancient woodland](#)¹⁰. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here](#)¹¹) or protected species. To help you do this, Natural England has produced advice [here](#)¹² to help understand the impact of particular developments on protected species.

Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see our publication [Agricultural Land Classification: protecting the best and most versatile agricultural land](#)¹³.

Improving your natural environment

Your plan or order can offer exciting opportunities to enhance your local environment. If you are setting out policies on new development or proposing sites for development, you may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development. Examples might include:

- Providing a new footpath through the new development to link into existing rights of way.
- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to encourage wildlife.

⁹<http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

¹⁰<https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

¹¹<http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

¹²<https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

¹³<http://publications.naturalengland.org.uk/publication/35012>

- Adding a green roof to new buildings.

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision.
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance on this](#)¹⁴).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks, changing hedge cutting timings and frequency).
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

¹⁴ <http://planningguidance.planningportal.gov.uk/blog/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space/local-green-space-designation/>

Latham, James

From: Ros Pickering
Sent: 08 November 2016 08:37
To: Neighbourhood Planning Team
Subject: CSNDP Policy 8: Strategic Green Gap

Dear Sir,

We would like to raise concerns about the Cradley and Storrige NDP concerning the CSNDP Policy 8 : Strategic Green Gap.

The Parish Council questionnaire was misleading and our views may have been misrepresented by the ambiguity of the questions regarding development in the SGG. There was no definition of development and we were opposed to housing development but supportive of community facilities in the SGG. This option was not clearly available. There is no provision in the NDP for siting of additional community shop facilities although this appears to be strongly supported by the community.

Yours faithfully

Ros and Chris Pickering

Latham, James

From: Close, Roland
Sent: 13 October 2016 11:16
To: Neighbourhood Planning Team
Cc: Johnson, Karla
Subject: FW: Cradley Regulation 16 Neighbourhood Development Plan consultation response

I have an additional observation:-

Policy CSNDP2 - refers to potential for developments of 10 dwellings or less on land which has a moderate or high capacity for development. So for example, The Church Stile Farm site has a low/moderate capacity according to Figure 6 in the plan so on that basis I believe it wouldn't be allowed under the NDP. But I do you feel that **further clarification is needed re. the minimum threshold, i.e. the site's capacity must be entirely moderate or above.**

This may seem a minor point but actually very important.

Regards

Roland

From: Close, Roland
Sent: 06 October 2016 15:28
To: Neighbourhood Planning Team
Cc: Johnson, Karla
Subject: FW: Cradley Regulation 16 Neighbourhood Development Plan consultation response

Comments from Roland Close & Andy Banks (Major Team) on Cradley NDP

Policy CSNDP 3 ; Economic Development

The policy refer to a 'Proposals Map' but I cannot find one! If they mean the 'NDP Plan Map for Cradley Village' then re-title that plan to read ' NDP **Proposals** Map for Cradley Village'. Accurate cross-referencing is critical.

We think that there should be a separate tourism policy. Furthermore the current wording is not very thorough where it states that:- 'The Parish council will also support tourism related development involving the conversion of redundant buildings'. We think that any policy needs to distinguish between tourism accommodation (self-catering, caravans, shepherds huts, tents, yurts) and attractions (farm parks, Alton Towers etc). Also need to distinguish between conversions and new builds.

So would the Parish:-

- a) Support conversions to tourism accommodation? – if so any criteria?
- b) Support new build tourism accommodation? – if so any criteria?
- c) Support conversions to tourist attraction(s)?– if so any criteria?
- d) Support new build tourism attraction(s)? – if so any criteria?

Policy CSNDP7 ; Area of Flood Risk

Who checks their maps. Have you consulted Environment Agency AND Land Drainage?

Policy CSNDP 8 – Strategic Gap

The pre-amble needs to make clear that the purpose of the strategic gap is to prevent coalescence and to maintain a generous visual gap and that unlike the AONB its designation does not arise from landscape beauty.

Personally it is considered that it should also allow for “...community facilities upon *appropriate sites*”

Forget the shop issue at present – think of all community facilities and the future!

Community facilities within settlement boundaries are rare as such sites would normally command a residential value. So they are pushed outside onto fringe sites. Surely with that in mind allowing such facilities in the strategic gap accessible to residents of both eastern Cradley and western Cradley makes sense.

CSNDP 9 : Design

Should the Village Design statement be attached as an Annex to the NDP if referred to?

Major issue with sentence : _ ‘Proposals for high density housing, such as that in outline for Pixiefields, will not be supported’.

- a) This criticises a specific permission and as such is inappropriate!
- b) Are they pre-judging a reserved matters submission?
- c) It was in fact not that dense and respected immediate surroundings.

A sentence re: density is appropriate but must be flexible. Eastern Radley is sporadic, loosely-knit and low density. Western Cradley is higher density. Housing schemes need to be judged on a site by site basis and informed by contextual analysis.

We would suggest:- “ The density of housing development must be informed by a thorough contextual analysis of the immediate surroundings and normally respect the prevailing density of the immediate surroundings’

Policy CSNDP 10; Conservation Area

Whilst separate legislation deals with listed buildings a policy is still wise re: how applications for listed building consent will be judged.

However, a policy is certainly required re: setting of listed buildings.

The Map of Cradley showing areas of Flash Flooding and Appendix 5 Landscape Assessment are difficult to read & interpret. I printed all the plans out but these two do not come out well.

Regards

Roland

8th November 2016

Dear Sir,

I would like to see the Cradley NDP rejected at Regulation 16.

General Concerns

An NDP is meant to be a positive planning document and I do not see this in the Cradley NDP and especially not in the process used to achieve it. The whole approach has been to stop further residential development and the NDP team's approach to every other aspect that should be covered by an NDP (business development, recreational and community facilities, community health) has been superficial.

I also feel that one of the main goals of the NDP team leadership has been to actively stand in the way of the Heart of the Village proposal and they have gone out of their way to ensure that the NDP is framed in such a way as to maximise roadblocks to this worthy proposal. The Heart of the Village team have worked openly and honestly to try and be included in the NDP following advice from a number of professional bodies that they should be represented in it - all to no avail.

My specific concerns about the NDP's policies follow.

CSNDP1

The current approach that the NDP team and Parish Council are taking is akin to metaphorically holding a gun to the community's head. The message is that as we no longer have a settlement boundary the NDP has to be accepted by the community because if the community does not there is the chance of rampant development in and around Cradley. This is being used to scare and steamroll people into accepting a document that is not fit for purpose.

CSNDP2

The NDP team's primary focus from the outset has been on housing development and how to stop it. Their view has been that Cradley has met it's current housing goals for 2031 so they have set out to make it difficult to build any more housing. This is naive as the expectation (based on past experience) should be that this housing requirement will change and should be positively addressed.

In the first paragraph of section 8.1 the document says:

"The loose-knit nature of the built environment in east Cradley is one of its most important characteristics and one which survives, notwithstanding recent infilling ..."

Here infilling is decried yet this policy says that the main way that new housing is going to be allowed is by infilling! If there is one thing that will change the nature and character of the village it will be excessive infilling, especially when the mindset of developers is to cram any development with as many houses as they can get away with (as evidenced by the Pixiefields proposal which has outline approval for 60 dwellings on 4 acres!)

I would like to see one or more areas of Cradley set aside for development and, if need be, the settlement boundary changed to incorporate these areas. I find the current proposal utterly wrong-headed.

I also have a concern that one of the main areas for green-field development identified in the NDP is owned by a prominent member of the NDP team and that member does not feel it is a significant enough conflict of interest to openly declare it. In my opinion when this was identified as a potential development site they should have stepped down due to this conflict and no longer been allowed to be involved in any NDP business.

CSNDP3

This policy will ensure that Cradley will only ever be a dormitory settlement. It provides no future for children who are born here to remain and work here. In my opinion we need more small businesses to be set up in Cradley and we should be actively allowing for the creation of suitable premises for these businesses. A lot can happen between now and 2031 and the blinkered approach represented by this policy is shortsighted and unacceptable. Proposing that the Ashvale industrial estate be the main area for any industrial development basically means that there will be very limited opportunity for attracting any significant new businesses to Cradley.

CSNDP4

Superficial fluff and, based on the NDP teams' recent actions, disingenuous.

I say this because more recently an additional factor has appeared in Cradley's NDP process which has been to design in barriers to stop the Heart of the Village project while trying to seem as if this isn't being done. My observations have led me to believe that this is driven by specific members of the NDP team. For reasons I can't fathom this approach has been accepted as an operating principle by the majority of the NDP group and Parish Council. I feel that this blatant procedural bias and hidden ulterior motive brings the whole NDP process into disrepute and presents a huge barrier to its acceptance.

CSNDP5

I appreciate and like the fact that we have an AONB but would like to point out a simple fact. It is the Malvern Hills AONB and was designed so that the landscape viewed from the Malvern Hills was not blighted. It is wrong to use this as just another way to object to any development that is *near* the AONB. The AONB's strict rules should be adhered to for proposals ***within its boundaries***.

CSNDP6

I have no problem with the definition of Local Wildlife Sites. I do have a problem with the March 2015 Landscape Assessment which had no documented process to its inception. It is my understanding that an informal meeting was held between the team leader of the NDP, the Parish Council chairman and the person that eventually produced this assessment prior to them being hired to do so, where a verbal brief was discussed and a cost for the work negotiated. No other NDP team members were told this meeting was happening at the time as I know at least one of them would have attended. It is my understanding that the eventual written brief was actually produced by the person that eventually produced the Landscape Assessment and rubber-stamped by the Parish Council. The community paid for this and we have never been told the basis for it's direction, and this is shoddy. Given the bias exhibited by significant members of the NDP team (see comments on CSNDP4), this has to be viewed sceptically. I object to this on the basis of it's being used to stop a community project from being given fair consideration.

CSNDP7

This policy should defer to the Environment Agency. All flooding risk assessment should be based on their data. If there is a concern with their data it needs to be addressed with them and their data amended.

CSNDP8

The incompetence and bias of the significant members of the NDP team have shone in this area of policy. The related question on the questionnaire that was produced was a travesty and the results are no basis for decision making. No map was produced to define the green gap and the question on the paper questionnaire and that on the web site were different. No definition of "development" which most people take to mean housing was given. A sensible, simple, and clear question was defined and unilaterally, at the last minute, thrown out.

At a meeting with Hereford's Neighbourhood Planning Team the Cradley NDP team were advised that they should seek to clarify the strategic gap question but have not done so. Until this matter is settled the NDP should not be accepted.

More recent feedback from Hereford Council at the Regulation 14 stage stated the this policy was too restrictive but this has been ignored by the NDP team. The reason for this is, in my opinion, that it would open a door to the Heart of the Village project which significant members of the NDP team are personally opposed to.

CSNDP9

I think that the conservation area should be limited to the oldest parts of the eastern part of the village. The extent shown on the map is too large.

Yours faithfully
Roman Iwanczuk

Latham, James

From: donotreply@herefordshire.gov.uk
Sent: 06 November 2016 18:10
To: Neighbourhood Planning Team
Subject: A comment on a proposed Neighbourhood Area was submitted

Comment on a proposed neighbourhood plan form submitted fields	
Caption	Value
Address	
Postcode	
First name	
Last name	
Which plan are you commenting on?	Cradley and storridge NDP
Comment type	Objection
Your comments	<p>Sitting for a short time on this NDP committee as a member of both the local business and residential community I was dismayed at the lack of resources, imagination and manners displayed in creating this document. I suggest it is the vision of a few, who may benefit directly from the plan, that gives scant regard to needs of parishoners. The obsession with a 'strategic green gap', lack of regard to travel and business requirements are sufficient to demonstrate it is cannot be considered a 'development' strategy. As a member of storridge community I feel we are particularly overlooked (even in naming). The addition of 'possibly storridge' with regards to a settlement boundary is a potential noose around our dispersed, but strong, community. Sitting so close to Malvern we seem to be offered no protection from creeping development, little recognition for our contribution to the parish and no blueprint for acceptable development (which our community does needs to continue to thrive) or tools to combat the affects of a4103 (and main roads to malvern). Whilst planning and/or politics may be 'contentious' issues the lack of open engagement and good manners were enough for me to withdraw from the committee and thus my support for the document. I suggest it is not fit for purpose. Given the behaviour i have witnessed i sincerely hope our comments are kept anonymous.</p>

Latham, James

From: donotreply@herefordshire.gov.uk
Sent: 08 November 2016 16:31
To: Neighbourhood Planning Team
Subject: A comment on a proposed Neighbourhood Area was submitted

Comment on a proposed neighbourhood plan form submitted fields	
Caption	Value
Address	
Postcode	
First name	Sue
Last name	BEE
Which plan are you commenting on?	Cradley and Storrige Neighbourhood development Plan
Comment type	Comment
Your comments	I felt that the Parish Council Consultation questionnaire did not adequately cover the issue of the proposed Heart of the village project, thus there has not in fact been any attempt to sound out opinion on the principle of this issue except via objections submitted to the Herefordshire planning proposal. From the start, the outline use of the SGG for this project has fallen within the heading of community use, yet the possibliity of this usage as suggested by Herefordshire planning recommendation at Regulation 14 was excluded form the amended NDP now under consideration without explanation.

Dear Sir or Madam,

I wish to make a representation about the Cradley NDP, currently at Regulation 16.

I have serious concerns about the whole process of consultation used to underpin Policy 8 of the NDP and feel the process has been totally unacceptable; the process has been manipulative and biased from the outset. The NDP cannot be relied upon to be truly representative of the views of the parish on this policy and is not fit for purpose.

The background to my complaint is that I am the secretary of the Cradley Heart of the Village Community Benefit Society, a society set up in 2015 to promote and enable the building of a community shop, cafe and play area in a beautiful 4 acre field in the centre of the village, called Morgan's Field, which is promised to be donated to our project by a local parishioner. Please see our website www.heartofthevillage.co.uk

We have been told by Community First, Village SOS and other organisations that support community groups that our project is just the kind of project that any NDP should be concerned with. The NDP group should be engaging with the project and finding out the full views of the parish on such a project and IF community support is found, they should be supporting the project, or at the very least, not blocking it. We have, however, just been dismissed by the NDP Lead as "a disenchanting interest group". (See Appendix 26.2)

CSNDP Policy 8, if adopted, would stop our project going ahead as it does not support community development in its newly defined Strategic "Green" Gap, which includes Morgan's Field.

Quite simply, the NDP group failed to find out the views of the parish on our project. The only vaguely related questions they did ask were manipulative, provided incomplete information and were not clear or open. Despite this failure they have produced a criteria based policy document, of which Policy 8 deliberately stops our project proceeding. They do not have a mandate from the parish to do this.

Furthermore, there have been several opportunities during the Draft and Regulation 14 stages where small amendments could have been made to the Plan to remove the block to our project, but these have been ignored.

The NDP group had a predetermined negative view on our community project and this view has been carried through the whole consultation process. I feel that they have refused to ask a straightforward, direct question about our project because they feared a positive answer - the HOV have pushed the NDP very hard to consult the parish on our project, but they have steadfastly refused to do so at every opportunity. They even did a major U turn in the summer of 2015 to drop a more complete and fair questionnaire.

They have held a completely biased view that the Strategic Gap must remain sacrosanct at all costs.

Their "consultation process" makes a travesty of the idea of community involvement in the production of this NDP. Any NDP is only as good as the robust and major evidence that backs it up, which is lacking here. The whole Localism Act depends on proper community consultation on issues and some very serious general principals are at stake.

Any NDP group and Parish Council producing a lasting planning document should be able to be called to account. We took our concerns to the Hereford Planning Department Neighbourhood Development Team at meeting with Sam Banks in December 2015. She has informed us that her role is " not to police the NDP group" and sadly she was unable to persuade the NDP group to look at their consultation process again. It appears the only recourse we have to voice our concerns is to register those concerns now at the Regulation 16 stage.

The lead of the NDP group wrote in a report to the PC at their meeting on January 12th 2016 that " Hereford CC said that the consultation would not be identified as an issue at either the statutory submission stage or the inspector's examination."(see Appendix 26.2)

I sincerely hope this is not the case and that Hereford Council and the Examiner will take these concerns seriously.

As well as the overall failure to consult clearly and openly on the HOV project, there have been numerous irregularities in the procedures carried out by the NDP group, all of which have helped to get the consultation "results" they sort from the outset. Some of these irregularities are very serious. Some of these irregularities are in themselves quite small, but it's the incremental nature of the repeated bias and misinterpretations that have lead to the perversion of the process.

In summary these procedural irregularities are

- *The production of a biased, manipulative and invalid questionnaire, supplied to the parish with insufficient information.

- *Misleading statements to the whole parish attached to the questionnaire in the Parish Council Reporter from the Chairman of the Parish Council;

- *Incidents of incorrect analysis of their data; (pointed out to them, but not rectified)

- *Incidents of misrepresentation of their data; (pointed out to them, but not rectified)

- *Misrepresentation and rewriting of the minutes of a meeting between the NDP group and Hereford Council Neighbourhood Planning Team.

- * Tokenistic consultation with our HOV community group;

- *An attempt to stifle debate on the issue at the parish council level;

- * Inaccuracies in the Hereford Council Environmental Report concerning options.

- *Major omission from the Consultation Statement concerning a detailed, full and unbiased questionnaire(later thrown out by the PC, with no documented reasons given)

* Inappropriate inclusion in the Consultation Statement of objections to the current HOV planning application; most of the objection letters are, or are closely based on, a duplicated objection letter produced by the Lead of the NDP group's spouse.

*Failure to consider issues raised about CSNDP Policy 8 by Hereford Council at the Regulation 14 Consultation.

*Failure to consider issues raised by parishioners at the Regulation 14 Consultation.

*The Vice Chairman of the PC has been hosting an anti- HOV website as part of his "business"(one of the complaints below concerns this issue).

*There are two complaints to the Hereford Monitoring Officer about issues relating to the behavior of two members of the Parish Council and their interface with the HOV project. One of these complaints has been made by our own Ward Councillor, Patricia Morgan. I understand the results of both these complaints are outstanding so I can offer no further information about either of them here.

Documentation that demonstrates all these other irregularities will be produced later in this submission.

I plan to lay out below a "consultation statement" of our own, to explain how the NDP has "consulted " with our project. This will contain a lot of detail, but the only way to fully understand how the HOV group have been treated is to see how the NDP group have behaved at every stage in relation to our project. Their own Consultation Statement might initially appear quite acceptable, due to all their selective omissions and manipulations and thus the full details of the course of events and the irregularities that have occurred are vital to see.

Yours faithfully

SARAH HERRIOT

CONSULTATION STATEMENT

CONCERNING NDP GROUP and HOV PROJECT.

1.0 AUGUST 7th 2014: PARISH COUNCIL PUBLIC MEETING.

This meeting was held in the Village Hall and was about the recent closure of the Cradley PO and Stores and the launch of the NDP group. The idea of an HOV project was put forward by Councillor AE.

Present: approx. 120

2.0 APRIL 2014; NDP SURVEY:

(See Cradley Parish Website, NDP, Documents, Survey Results)

This was a very simplistic survey. AE insisted on it containing a question about the idea of some sort of community hub, question number 6.4:

" Do you think the village would benefit from a designated area for community use? "

The response to this question was 64% in favour. This was the fifth most positive answer to any of the 21 questions asked, and two of the four higher ranked questions were completely out of the remit of the NDP anyhow as they concerned the GPs surgery. Thus it was the third most positively answered question relevant to the production of the NDP in the questionnaire.

Furthermore, the NDP group produced a document entitled:

NDP survey responses - initial analysis

(See CP Website, NDP ,Documents, Survey Analysis)

This document confirms the above, saying there was a " very high response and comment levels and relatively clear consensus."

It goes on to say that the NDP group should be considering...

"b) Develop a new 'heart of the village site'

* is this a practical option?

* would it be dependent on estate investment?

* would advantages of this outweigh resistance to estate development."

This list of possible discussion points and issues to consider NEVER got any further at all with the NDP group. It raises the issue why the group ever asked the question in the first place as they completely ignored the answer from now on despite both such a positive answer and the fact that a 4 acre field specifically for such a project was promised to be given to the HOV project shortly afterwards. The HOV group did, however, look at all these issues later.

See options meeting January 2015 below.

3.0 APRIL 2014: FORMATION OF HOV WORKING GROUP of Parish Council.

Councillor AE found some like-minded Councillors who joined together to peruse the idea of a Heart Of The Village.

This group of Parish Councillors, AE, TI, WH and SEH, worked over the spring and summer, talking to local landowners in the Kingsbridge, central, part of the village about the project. We were delighted to be offered the field known as Morgan's Field, as a very generous gift from Mrs Morgan. The agricultural tenants on the field agreed to give up their three-generation tenancy for a sum of £12,750. The ability for any community to acquire a four acre site is a very rare event, especially so cheaply and adjacent to the settlement boundary. Such land for community use is usually very difficult indeed to find.

4.0 AUGUST 4th 2014: PARISH COUNCIL PUBLIC MEETING in Church run by the Parish Council and the HOV working group.

This meeting was to launch the idea of a Heart of the Village. This was still a very unspecified project, but the offer of Morgan's Field was presented, as well as asking the parish views, by show of hands, on where they felt the project might be best placed, what it should include etc.

Loud opposition came from the front pew, from the Lead of the NDP group and their spouse. Their main concerns were that area would flood and that flooding of Cradley Brook down stream would increase and that any such project was "urbanisation". The couple own an old mill house, downstream, which has had flooding problems in the past.

A show of hands demonstrated 63% support for the HOV project, by answering the question;

"Who is generally in favour of the idea of the Heart of the Village?"

113 in favour .(63%) Present : 178 total

(Results see Appendix 4.0)

5.0 AUGUST 7th 2014: NDP GROUP MEETING: (CP website ,NDP, Documents, Minutes.)

A pre meeting email from one NDP member, GF, to the rest of the group says about the HOV project just launched: " we have a problem Houston" and lists a page or more of objections to the project.

At the meeting itself, AE suggests a six month pause in the NDP process to allow the HOV to gather more information on the project and to make the proposals more specific, but this is rejected. The HOV project is described as being AE 's " pet project", "coming out of the woodwork ", being "at this late stage" and being one of "a late crop of projects." The meeting decided to keep going with the NDP and not to consult the parish.

The idea of a specific site allocation was not considered by the NDP group as it did not fit with the group's desire for the plan to be "criteria based". This was

accepted by the HOV group.

The idea of a Community Right to Build for the project was clearly not understood by the NDP group. (See minutes) The HOV group would have liked to peruse this idea instead of a planning application and we had researched the idea, but it was obviously not an option due to the NDP group's opposition to the project.

6.0 AUGUST 19th 2014: NDP GROUP MEETING;

(See CP website, NDP , Documents, Minutes)

Two issues;

6.1 The NDP group suddenly decided to commission a "Landscape Constraint Plan." (By which I think the minute writer means a Landscape Capacity Assessment. This had not been considered by them before but the reason given was:

- "As an essential prerequisite on taking on board several recently revealed projects (incl H of V, sports pitches. Stoddard/ Buryfields scheme) It was noted that the H of V project could not be included until the NDP via the VCP [sic] had been carried out and thereby the issue of the green gap been either upheld or changed (i.e. a revised VDS with the consent of the community clearly elicited."

This seems to mean, in clear English, that the Landscape Assessment Report was to be commissioned to find out the landscape capacity of Morgan's Field , among other parcels of land, to potentially block the HOV project without having to ask the views on the parish on the project clearly and openly. It does however seem to show that at this stage the NDP recognised that the views of the community should at some stage be elicited.

6.2 EXAMPLE OF MISREPRESENTATION OF DATA-

The minutes of the meeting above contain the summing up of the NDP consultation process up to this point, made by the NDP Lead to the Hereford Council NDP Team representative present at the meeting.

The minutes contain the completely unsubstantiated claim that:

" the best responses had been as follows

6.1...

6.2...

6.3 keeping the Green (Strategic) Gap."

There is no evidence at all for this statement;

NO questions have EVER been asked about the Strategic Gap in the previous VDS or Parish Plan questionnaires.

The 2014 survey had NO questions concerning the Strategic Gap.

The 2014 Planning for Real results in fact even show the reverse is true. (See NDP Website, Documents, Planning for Real Results);

Cradley Event - all 35 out of a total of 37 flags in the Strategic gap /Kingsbridge area list support for elements of the HOV project.

Storridge Event - the flags for support are 20 out of 25.

This interpretation of the consultation data up to this date is plainly wrong and demonstrates the NDPs firm desire to " keep the Strategic Gap" at all costs despite evidence to the contrary.

7.0 NOVEMBER 2014:

HOV group stops being a working group of the Parish Council - it is clear that a potential trading body like a community shop and cafe can not sit with a Parish Council that does not have the qualifications to trade. This was the advice of the Plunket Foundation.

The HOV Group work towards becoming a Community Benefit Society, which is finally achieved in the spring of 2015. (See our website)

8.0 JANUARY 12th 2015: HOV OPTIONS MEETING AT SCHOOL.

The HOV group looked at all possible options for a site for a new shop, as well as the possibility of buying back the old Stores. The HOV group also had long discussions with two developers to see if any schemes involving housing development and building a community shop would be possible and desirable. This work was JUST the sort of work an NDP group should be have been doing, as they themselves suggested in their questionnaire analysis.

In January 12th 2015, a village Options Meeting was held in the school by the HOV group, when about 50 people attended and worked in facilitated small groups looking at the pros and cons of all the options on the table for a community shop at different sites. The individual options were all assess on a traffic light scheme, red, amber and green, by the members of the community present. After the meeting an options matrix was produced showing a purely community stand-alone HOV project on Morgan's Field was the most preferred option. The parishioners present had little desire to work with developers and the HOV began to formalise a plan for our stand - alone project in Morgan's Field.

The two developers continued independently with their own plans for housing developments with possible community facilities included.

Attendance 50.

(See Appendix 8.0 for options matrix produced from the results of the meeting)

9.0 MARCH 5th 2015: NDP MEETING TO REVIEW THE NEW LCA.

NDP group dos not hold any meetings from August 19th 2014 until the Landscape Capacity Assessment is completed and presented to the group on March 5th 2015.

The LCA is summarised in the NDP update report given to the PC by the NDP Lead at the PC meeting 10th March 2015.(See Appendix 9.0)

In one and a half pages, it repeatedly refers to the assessment of capacity for development, failing to point out the LCA in fact refers to RESIDENTIAL development only and specifically.

This has been a recurring omission by the NDP group (See Cradley PC website, News and Notices, Cradley Reporter issue 25) and is of great relevance to the HOV project, which is NOT residential, so has very differing legal requirements for planning than for residential development, especially in

reference to areas subject to flood risk such as Morgan's Field. The NDP group has frequently used the fact that Morgan's Field has low capacity for "development " as assessed by this LCA, without saying this is an assessment for residential development, to suggest unsuitability of the field for our project.

10.0 APRIL 20th 2015: Meeting of NDP GROUP AND HOV GROUP and OTHER PROJECTS.

(See Cradley PC Website, NDP, Documents, Minutes)

The meeting was held with the NDP group and the HOV group, along with several other projects. This meeting was chaired by the AONB. The other projects presented were the Sports Club, a similar pure community group, proposing a new sports field near the school and the two developers who had both had proposals for housing developments with some community facilities. It was agreed to:

1. Present all four proposals at the PC meeting already planned to present the LCA to the parish
2. Present the same at a drop-in-day or " options bazaar" in the village hall.
2. It was agreed that a further questionnaire would be presented to the parish about the four projects.

This was welcomed by the HOV and we were delighted that the NDP had finally decided to present our plans and to consult the parish clearly, openly and directly about their views on our project and its suitability to be somehow included in the NDP.

11.0 JUNE 3rd 2015: MEETING IN CHURCH BY PARISH COUNCIL TO PRESENT FOUR PROJECTS and the LCA to the Parish.

(No minutes available on the Cradley PC website)

The bulk of the meeting consisted of the presentation of the LCA. There was a short question and answer session about the LCA, then each of the projects were allowed a short time to present their plans.

Posters and displayed about each option were available to view at the back of the church.

The Chairman of the PC promised the parish that a questionnaire concerning the four projects would be put to the parish and should be "out before the end of June". I made my own notes of the meeting at the time and this is a direct quote.

The fact that this questionnaire was going to be produced was included in the NDP Project Timeline on their website and mentioned in the Parish Newsletter.

Attendance; approx. 200

12.0 JUNE 4th 2015: Options Bazaar

This was held in the Village hall, with posters and plans displayed and disused by the four projects, (the two community projects and the two housing development projects) as well as the NDP group presenting their LCA.

The Consultation Statement by the PC mentions both these events, but can

not even bring itself to mention the two specific community projects by name, which are supposed to be the very "options" they should be considering. Nevertheless, the HOV really enjoyed the whole process and particularly engaging with parishioners, many of who displayed a great enthusiasm for our project and enjoyed our heart-shaped cakes!

13.0 JUNE TO AUGUST 2015

The NDP produced a questionnaire the initial aim of which was to "to seek the community's views with regard to a number of current village development initiatives." (NDP Minutes 11.6.2015)

A parishioner with a professional background in Market research joined the NDP to help draft the questionnaire.

She left the NDP shortly afterwards, having not been able to assist them.

The production of this questionnaire was extremely difficult as the HOV felt that the NDP group was producing a poor questionnaire and there was much debate. The HOV had a legitimate right to be involved in the production of this questionnaire, as both parishioners and as stakeholders actually having been asked by the NDP to write the HOV section ourselves. Despite this, we were later accused of interfering and "gerrymandering."

In the end, each proposal was allowed 60 words in 6 bullet points and was allowed to include their website addresses for more details.

Despite the initial aim of this questionnaire being "to seek the community's views with regard to a number of current village development initiatives" the NDP group felt it necessary to include a question about preserving the Strategic Green gap. At this juncture, a map WAS included with the questionnaire, showing the Strategic Gap to be the very large area proposed by the Malvern Hills District council in 1998.

13.0 AUGUST 6th 2015: NDP MEETING.

The final version of the questionnaire was unanimously agreed by the NDP group.

(See this Version in Appendix 13.0)

A representative of Hereford Council NDP Team was present as an adviser and raised no concerns about the questionnaire.

It is of note that the minutes record the statement "If the results of the questionnaire prove that one issue gets supported, then the Parish Council would be prepared to take this into account."

Is this why the PC and NDP do a major U turn, see below?

14.0 AUGUST 11th 2015: CRADLEY PARISH COUNCIL MEETING.

This meeting was not attended by the NDP lead.

There are two versions of these minutes;

ONE ; (See Cradley PC website, archives, minutes, with a large part)retracted.

TWO; sent to me by the PC Clerk with no retraction. (See appendix 14.0)

I was not present but heard that GF read out a prepared speech lasting several minutes. I have asked for a copy of this document , but have not been

sent it.

I find it very odd that GF had never voiced any misgiving about the questionnaire beforehand and was in fact present at its " unanimous " acceptance by the NDP group only 5 days before.

The reasons for throwing out the questionnaire are not clear from the minutes but they show the discussion was angry and impassioned. Apparently the bulk of the PC were persuaded very quickly to throw out the questionnaire that their own expert NDP group had taken 3 months to produce. Of the seven NDP members, two were not on the PC at the time, and the NDP lead was not present at this meeting to put a possibly differing viewpoint. Only one NDP member voted to keep the plan. (Councillor AE, who is on the HOV team), two voted to throw it out and one abstained. This hardly shows the unanimous support the questionnaire had had 5 days before.

I have no idea what had happened to change so many minds.

All I can say is that it was very odd.

It was made more odd by the vice chairman, who was not on the NDP group, suddenly producing a " simple questionnaire" out of the blue which the whole PC agreed to in the space of a few minutes, despite the minority of them having no NDP experience at all.

This appears to be a most unusual way to help produce the most important parish planning document for years.

What happens next is equally odd-

15.0 AUGUST 18th 2015: NDP MEETING.

(Please see minutes on Cradley Parish Website, NDP, documents, minutes)

I was present at this meeting.

The NDP group appeared to have already agreed to accept the PC's action prior to this meeting, as they came ready armed with a full questionnaire, which had already had some "revisions" from the PC draft. The opinions of the members of the NDP who are not on the PC or those of the NDP lead, all of who were not present on 11th August, appear never to have been openly sought or recorded. There was absolutely no discussion at all about the PC's decision as it was never mentioned per se.

It would be entirely feasible for a working group to disagree with the PC on such an important matter. In particular, they had worked hard on the questionnaire for 3 months and at the April 20th 2015 meeting, they had firmly committed themselves to this options questionnaire and they had unanimously agreed to it 7 days before. Their Lead, who has extensive professional planning experience, was not present at the previous PC meeting to offer her expertise if she had so wished. They could easily have gone back to the PC to discuss it all again, possibly with the PC Lead and a member of the Hereford NDP Team present to give factual advice and explain to the PC as a whole how a NDP should work. Such possibilities were not discussed at all and the whole group seemed to be entirely happy with the new questionnaire; It would appear that a vast amount of un-minuted business has been carried out behind the scenes certainly between August 11th and the 18th, and possibly before, that is neither clear, open or transparent.

16.0 THE SECOND QUESTIONNAIRE- THIS IS INVALID and MANIPULATIVE, with incomplete information supplied.

Please see NDP Consultation Statement for a copy of this questionnaire and Appendix 19.0 for the different on-line version.

The HOV tried at the meeting above and through several emails afterwards to get some very important alterations to the questionnaire that would improve clarity but none was accepted by the NDP Group:

In relation to:

16.1

Q1. We asked for the question to be redrafted as you cannot ask a question containing and/or (i.e. Contains THREE choices; shop alone/cafe alone /shop and cafe) and then expect it to be answered meaningfully by yes or no.

Question 1 is an invalid question.

Refused.

16.2

Q1. We asked for the question to contain a proper definition of the HOV project - we are not a "second shop" but a total project that includes shop, cafe, village hub, extensive green space, children's play area and community orchard. The question in no way relates to our project. Our project is the ONLY purely community-led option in the parish at this time. There is no proposal from any other group for just a shop or just a cafe, and it seems unlikely that there every will be. Why not use this question to ask a clear, open direct question about our project, by name, giving our website details as before, as our option the ONLY purely community option on the table?

To not clearly define the HOV project appears manipulative, and certainly is not giving the parish all the full and relevant information on which to make their choice.

Refused.

16.3

Q1. We asked for the word "community" to be added to the question.

To not do so appears manipulative, as above.

Refused.

16.4

Q.1 We asked for this question to define our site, Morgan's Field in the currently defined Strategic Gap. This would be in line with the next question, which did, at this point, define the site of the proposed new sports pitches as "NEXT TO THE SCHOOL."

Result- the mention of the site of the sports pitches was removed from the questionnaire (see minutes 1.2)

This was done specifically so that NO sites were mentioned for either of the community projects. The reason given was that the NDP was planned to be a criteria based document only with no site allocations. However, even a criteria

based policy has specific site consequences, particularly CSNDP Policy 8 which relates to a SPECIFIC SITE- the NDP seem very happy to produce a policy that PREVENTS a specific community project going ahead in a specific site, without ever asking the parish clearly and openly about this very point. To refuse to mention our site appears manipulative, and is certainly not giving the parish full and relevant information on which to make their choice.

16.4

Q.3. We asked at the meeting, (Not minuted) for the inclusion of a map to define specifically the Strategic "Green" Gap, as it now seems to have become (It is possible that the new addition of the word "green" by the NDP group might be thought to conjure up a certain image?)

The NDP refused to include a map, with the PC Chairman saying that "everyone knows" where the Strategic gap is, and then several members gave differing definitions. I remember this particular exchange very well! It is in fact not clear at all where the Strategic Gap is: Please see my submission to the NDP in the Consultation Statement. The history of this gap is very relevant.

Of particular note is the only map available for any concerned parishioner to consult is the map on the PC website in the VDS:(this is shown in Appendix 16.4 and is also on the PC website in the VDS)

It is not clear from this map whether the gap contains Morgan's Field or not as the gap is labeled directly over the Green Farm or Bean Field. Morgan's Field itself is shaded blue, along with other parcels of land in the parish and labeled as a "space."

Why would the NDP not wish to be as clear and open as possible and supply a clear and definitive map to the whole parish?

A map had been planned to be included in the original questionnaire so cost can hardly be an issue.

To not include a map appears manipulative, and is certainly not giving the parish full and relevant information on which to make their choice. I feel that without a map, this question is invalid.

Refused.

16.5

Q.3 We asked for the word "development" to be defined or to specify "housing development."

(NDP website, Minutes, see section 1.3) The minutes state: " it was queried whether the term free of "development" for the Strategic Green Gap could be taken as meaning no change of any sort. This could produce a distorted response for the Heart of the Village proposal, which has no housing content. Following discussion it was agreed to retain the current wording."

This demonstrates that even at the time the NDP group could see this question was worded in a way that could "produce a distorted result" but failed to rectify the issue and failed to make the question entirely clear. The NDP team chose to use the formal definition of development to mean any building of any kind. We feel strongly that this is not how many lay people view this term, which is often taken to mean housing developments, and may or may not consider a community shop and cafe as such a "development." Why

would the NDP not wish to make their questions as clear as possible?
To not define clearly the term used in the question is manipulative and is certainly not clear.
Refused.

16.6

A further point about these minutes is the bizarre statement by the Chairman that the NDP would consider options with support and put them at the end of the plan: considering they were purposefully NOT asking specifically about our option, how can they then include it? This type of meaningless answer was often given to our HOV group.

17.0 MAJOR OMISSION FROM THE CONSULTATION STATEMENT:

The whole process outlined above, concerning this questionnaire, has been omitted from the Consultation Statement. The questionnaire took up three months of hard work by the NDP group. The Statement should include details of all options discussed with the parish and details of why they were carried forward or not carried forward, to inform the plan.

The questionnaire was widely advertised by the NDP group as going to take place and was widely believed to be going to take place by the parish.

This complete U-turn by the NDP group and Parish Council is not included in the statement. As the U-turn is not mentioned, neither are the totally spurious arguments put forward for the overturning of the questionnaire.

18.0 MISLEADING STATEMENTS to the whole parish from the Chairman of the Parish Council;

(see Parish Council Website , News and Notices, Cradley Reporter, number 26)

The Cradley Reporter, the Parish Council information leaflet, was sent out with the second questionnaire to every household and the PC Chairman wrote an article attempting to justify the PC 's actions in throwing out the original questionnaire.

This article is frankly shocking.

It contains several major untruths:

18.1 " Three of the four projects" – i.e. only the sports club project was not " dependent on commercial finance." The PC have known all along that the finalised HOV project presented to them on April 20th 2015 and presented in the questionnaire, was a project for a community shop and cafe only, to be run by a Community Benefit Society, and not dependent on any backing from commercial finance at all. Of course, we had, at the insistence of the PC itself, had preliminary talks with two developers who were keen to link their housing schemes with some form of "community" shops on their own sites, but after the options meeting in January 2015 any such possible involvement the of HOV in any housing schemes was not pursued.

The Chairman of the PC was wrong here, and was deliberately trying to link our project to housing development in the minds of parishioners, at the very

time they are filling out the second questionnaire.

18.2 "It might appear that the PC was promoting, certainly advertising, commercial developments" [in the questionnaire.]

This is wrong: an NDP is fully entitled, and in fact expected, to put such options to the parish, even commercial developments. This is exactly what NDP questionnaires should be doing.

Putting a formal questionnaire to the parish on such schemes is in no way "promoting such schemes". The Chairman of the PC is wrong about the role of the NDP here.

A Hereford Council NDP team member was present at the NDP meeting when the first questionnaire was agreed; they had no worries at all that the questionnaire was in any way unlawful as the PC Chairman is trying very hard to suggest it was.

Even if the PC got cold feet about asking about commercial housing developments, there was no justification to not ask simple, clear, open questions about the other two projects, which were entirely community run projects; the sports club proposal and HOV.

18.3 "Outside projects should, and can, promote their own schemes and endeavour to persuade parishioners themselves that theirs is the best project."

Of course we can promote our own project and happily did so. However, unless such projects are put head-to-head to the parish by an NDP questionnaire, it is hard to see how we can prove our project might be considered the "best"- this is the role of an NDP to find out the preferences of a parish and is EXACTLY what they should have been doing.

It is ironic that when we eventually did our own parish survey, the NDP have refused to acknowledge it, saying we "lobbied" i.e. in their own words, we "promoted our own scheme and endeavoured to persuade parishioners ..."

19.0 SECOND QUESTIONNAIRE: INVALID.

The NDP's second questionnaire was delivered to all households in the parish and was also available on-line. (See APPENDIX 19.0). To access it on-line you needed to input the number on your household paper questionnaire (for security). However the questions on-line were DIFFERENT in very significant ways to the questions on the paper version.

Question 1. Do you want provision for an additional shop?

No mention of a café at all.

Question 2. Do you want the strategic gap kept free from development?

No mention of the site between east and west Cradley this time, and again, no map.

This total disregard for accuracy shows just how dismissive the NDP group was about their "consultation process". To my mind, these two differing versions invalidate the whole questionnaire. There are numerous comments asking for a map or asking where the gap is (See PC website NDP NEWS, Questionnaire results, full comments)

This email version of the questionnaire is not presented in the Consultation Statement.

20.0 SECOND QUESTIONNAIRE RESULTS: INCORRECT ANALYSIS OF DATA;

(SEE; Cradley Parish website, NDP, first page, under NDP NEWS, [not under documents as before] Questionnaire results, full comments)

Question 3. The NDP give their results as 211 (70%) as saying YES to keeping the SGG free of all development. This is wrong.

In fact one needs to look closely at the comments made by parishioners here. Almost every comment concerns HOV and there is utter confusion; People are trying to put forward their views about the HOV project, both for and against, but the question does not allow them to do so.

In particular, 17 respondents to Question 3 clearly qualify their answers saying they did not wish HOUSING development in the SG but were happy with the HOV project to be built in the gap. Despite these clearly stated qualifications, these answers have been taken to mean 'YES' answers, thus counting towards the 70% in favour of keeping the SG free of all "development". This is plainly wrong. I have pointed this error out to the NDP group who have refused to modify their data.

It is obvious from all these comments that the answers to this question cannot be considered to be a true representation of the parish views. There is utter confusion in the minds of the parishioners who are finding it impossible to put their views clearly. There may be many more than the 17 people disenfranchised, as explained above, who have been confused by the question.

Note also that there are also numerous comments asking for a map.

21.0 SECOND QUESTIONNAIRE RESULTS; MISINTERPRETATION OF DATA.

(See Cradley PC Website, NDP, under NDP news, questionnaire results,)

The text given on this page "What do these answers and comments tell us?" was also published in the CMS Newsletter and so has had a major influence of the perceptions of the parish. This is a major misrepresentation of the data and is very damaging to our project.

This text is completely biased and the so-called conclusions CANNOT be drawn from the hard data under any circumstances. There is no attempt made at proper statistical analysis whatsoever. This is just shocking.

The Statement is made;

"1. The village would benefit from a shop serving East Cradley –located near the school–"

This is wrong.

This statement appears to be based on the comments of 12 respondents only i.e. 0.6% of the parish residents and only 4% of those responding...

It is ironic that the NDP have deliberately refused to ask a clear and transparent question about the options for a community shop and café, but are very happy to misinterpret their data to give a completely biased opinion

themselves.

Despite quoting the views of 12 respondents only on the siting of a “shop” they are happy to ignore the numerous comments saying the questionnaire is invalid, supplies incomplete information or is biased....

This issue of misinterpretation was also taken up by a parishioner Mrs. R, who is unconnected to the HOV project, who wrote and spoke to the Chairman and Vice Chairman of the PC, but no action was taken; The article remains on the website and a retraction of the article in the CMS Newsletter was not made. (See Appendix 21.0 for Mrs. R’s emails.)

22.0 JULY 14th 2015; PARISH COUNCIL MEETING.
(see Cradely PC website ,archives, past Minutes)

At this meeting a motion was put forward by the NDP lead to approach the owner of Morgan’s Field with a view to the PC acquiring the field for the Parish Council rather than allow the HOV project to acquire the field. There can hardly be clearer evidence of the opposition of the PC to our project. This motion was passed.

The eventual outcome was that the owner of Morgan’s Field remained happy to gift the field to the HOV project only.

23.0 SEPTEMBER 2015 HOV SURVEY;
(See appendix 23 .0)

After the decision by the PC and NDP group to throw out the first questionnaire, we had no choice but to send out our own Survey. We needed hard evidence to help persuade the NDP group that our project should be considered, and we would also need this data later for help with funding. We distributed an HOV information leaflet and a survey to every household in the parish, by hand and tried to talk to as many people as possible on the doorstep. Our leaflet contained full information, including a map and asked three simple questions. The survey results could be posted (the majority), done online or given to us on the doorstep.

We published our results in the CMS Newsletter January 2016.

We had 228 respondents from the parish and 84% supported the project, 86 people said they volunteer in some way and 158 said they would buy shares in the project. This was very good news and shows clear support for the project.

These figures are pretty compatible with those found in the NDP second questionnaire as far as statistical significance goes in that they had 260 respondents to their SGG question .

24.0 NOVEMBER 9th 2015; MEETING BETWEEN HOV and SAM BANKS
Hereford Neighbourhood planning Team Leader.

We had this meeting to discuss our concerns with Hereford NDP Team as there seemed to be a huge disparity in parish opinion shown by the two data sets, the HOV survey and the second NDP Questionnaire. We felt the NDP group was pushing ahead to block our project with no mandate to do so (See Appendix 24.1 for our summary and Appendix 24.2 for her reply). Sam Banks could clearly see our concerns and contacted the NDP group to arrange a meeting with them, which was held on December 2nd.

25.0 DECEMBER 1st 2016 MEETING PC ATTEMPT TO STIFFLE DEBATE.

This meeting was an extraordinary meeting arranged hastily to pass a motion accepting the Draft NDP to be put forward to Hereford Council (and also, coincidentally to discuss raising the Parish Precept!) This meeting was a CLOSED meeting, so that the 25 or so interested parishioners present were unable to raise their concerns. This hardly shows an NDP putting forward a draft that confidently and clearly reflects the views of the parish. The parishioners excluded from any debate were more than unhappy. At the same meeting, a member of the NDP group (since resigned) who was unable to be present asked for her letter of criticism about the NDP consultation process to be tabled at the meeting. The letter was emailed to the PC members PRIOR to the meeting but was not read out and no copy was made available to the attending parishioners, despite a request at the meeting to do so.

26.0 DECEMBER 2nd MEETING NDP group and Hereford NDP TEAM.

To recap, this meeting was set up by Sam Banks after we raised our concerns with her.

There are major issues about what was said at this meeting.

26.1

There are two versions:

One ; "Corrected" Minutes written by Lead of the Cradley NDP Group (See CRADLEY PC website, NDP Documents, Minutes Hereford December 3rd[sic])

These appear to have been written after the NDP meeting 29.12.2015 "for the sake of accuracy" (See Cradley PC website, NDP, Documents, Minutes for meeting, December 29.2015)

It seems unusual for the NDP to correct any minutes written by Hereford. I can find no record that these "corrected" minutes were sent to the Hereford NDP Team for THEIR approval at any time.

TWO; a tape recording of the meeting made with the consent of all present at the time. (See transcript of part of the tape Appendix 26.3)

Councillor AE, Chairman of the HOV group, was very clear in his understanding of the meeting;

a) He feels that Sam Banks said that the NDP group should consult fully with parish again about the contentious HOV issue.

This view is upheld by the Minutes, which say;
SB "Sort out issues through further consultation/reaching middle ground."
SB "Do consultation in January"
The transcript clearly says;
SB "To Have a consultation on that.....to ask a set of NON LEADING QUESTIONS on the issue."
SB "on your next consultation.....make sure when you send them out, if you are going round people etc.."
All these statements point to a further questionnaire of the whole parish, not to a tokenistic meeting with the HOV group.

b) She did not say that the HOV survey was not valid- she was saying that any NDP survey or questionnaire DONE BY AN NDP group should not include direct lobbying, as the role of an NDP group was to seek opinions about options in a neutral fashion. We accept our survey could maybe not be used as the only final data on which to base the NDP at this stage, but as it contradicted their own data so much, further clear consultation with the parish on the HOV project was necessary.

The NDP group, however, had a different understanding of what she said;

a) They feel that SB said that they should "consult " with the HOV group only, not the parish.

b) That the HOV Survey result could not be taken into consideration at all and "cannot be accepted as objective evidence."

26.2 MISREPRESENTATION OF MEETING BY NDP LEAD (See Appendix 26.2 NDP update to PC Meeting, Key Points, Consultation)

The lead of the NDP group gave an update of the meeting to the PC on 12.1.2016.

She fails to say Sam Banks pointed out major risks to the NDP itself and that she recommended further consultation with the parish. She does say such a meeting is going to take place under "next steps" without saying why. This is a misrepresentation of the meeting to the PC.

This misrepresentation is crucial- the NDP were asked to see SB at her request, but have failed to acknowledge her advice, let alone follow it, showing a disregard for due process as outlined to them by SB.

26.3 MISREPRESENTATION OF MEETING BY PARISH COINCIL CHAIRMAN;

The PC Chairman has gone on to misinterpret this meeting too. The following is taken from a posting on the PC website;

Neighbourhood Development Plan Update

At an Extraordinary meeting, held on Tuesday 1st December, your Parish Council voted to adopt the draft Neighbourhood Development Plan presented by the NDP working party.

The NDP group then met with Herefordshire Council's NDP team to assess our approach and get guidance on the best road forward to completion and acceptance of the full Plan. It appears that some disquiet has been raised in the community on this matter, but, happily, we can now confirm that Hereford assured us that both the NDP working party, as well as the Parish Council as a whole, has acted inclusively and wholly correctly in producing this vitally important draft Neighbourhood Development Plan.

Sam Banks did NOT say the NDP or PC had acted inclusively and wholly correctly- she pointed out there was a major unresolved issue that was a risk to the NDP and that further consultation in January with the parish was required to it sort out.

27.0 JANUARY 14th 2016. MEETING BETWEEN NDP GROUP AND HOV GROUP. And SUBSEQUENT DIALOGUE WITH D.C PLANNING CONSULTANT; THIS WAS TOKENISTIC only.

(NB No Minutes of this meeting are available on the NDP web pages, despite this crucially important consultation being mentioned in the Consultation Statement) Minutes sent to us by the PC Clerk are in Appendix 27.0)

This whole process was completely tokenistic – the NDP had no intention of coming to any compromise at all over their Strategic Green Gap Policy. This is perfectly obvious from their own account of the meeting in the Consultation Statement- they had a preconceived objection and no amount of discussion was ever going to make them change their mind and produce any amendments whatsoever.

The upshot of the meeting was that a letter to was drafted to David Crofts to see if he could suggest any solutions to the Policy 8 that would not stop the HOV project from going ahead and to list any such ideas with an assessment of their risk to the NDP.

David Crofts was completely unable to find any such wording at all, let alone put any differing options to us, with their attendant risks to the NDP clearly explained.

This is farcical- of course there are numerous such options which he did not WANT to consider.

This direct obstruction by David Crofts and KN of the NDP is best observed by reading the FULL correspondence as it is very telling indeed. (See Appendix 27.0)

David Crofts attempts to justify finding no possible way to amend the Policy by –

i) Saying the planners would not approve our application. HE appears to be acting as the Hereford Planning Department here! This is not the issue. He was NOT ASKED to find a way to specifically approve our specific project, but to find a way that prevents it being blocked by the NDP.

This incorrect argument is repeated several times by KN.

ii) He thinks it is “a bad idea.”

28.0 HEREFORD COUNCIL NDP ENVIRONMENTAL REPORT:

(See Hereford Council NDP website, Neighbourhood areas and plans, Cradley NDP, Regulation 14 documents)

This Strategic Environmental Report contains some errors in relation to the HOV project.

It states;

* “A range of alternative options (48) were considered prior to reaching a decision over the format Submission Plan”.

*5.1 then lists “all the options that were considered by CRADLEY PARISH during the development of their plan.”

*5.2 says “these options were formulated from the summer 2015 questionnaire but were ALSO considered at public consultation events across the Parish in summer 2015.”

*Appendix 4 Table B2 lists the 48 Cradley NDP options.

Option CSOP21 is given as ‘Develop a new Heart of the Village Site.’

As I have just spent many pages demonstrating, the PARISH of CRADLEY has never had the opportunity to voice their view about an option to “DEVELOP A NEW HEART OF THE VILLAGE SITE.

The four preceding statements are WRONG in relation to the HOV project. Having spent many months battling with the obfuscation of the NDP group it is particularly galling to see these errors in the Hereford Report. It is not clear if these errors are a genuine mistake on behalf on the compiler or whether they are the result of pressure from the NDP group or even collusion with the NDP group.

There are other errors unrelated to HOV too e.g. the listing of CSSOP1 “develop houses on field opposite St Katherine’s.” In fact houses were already built on this site prior to the launch of the NDP thus the inclusion of this option is entirely meaningless.

29.0 REGULATION 14 CONSULTATION.

29.1

OMISSION IN CONSULTATION STATEMENT; as already pointed out, the statement fails to mention;

-the agreement with the four option promoters to put their options to the parish.

-the promise to the parish that such a questionnaire would be produced and give the parish the opportunity to put their views on the four options.

-the 3 months of hard work involved for all in producing the first questionnaire.

-the sudden and odd throwing out of the first questionnaire by the PC.

29.2

FAILURE TO CONSIDER HEREFORD PLANNING DEPARTMENTS OWN RECOMMENDATION :

(See NDP Consultation Statement Appendix 6C)

The response of DEVELOPMENT MANAGEMENT to CSNDP8;

-says the Policy "is much too restrictive"

-"I would say why not restrict development to that :-

- a) Reasonably required for agricultural and forestry purposes;
- b) Public open space;
- c) Community facility or facilities

The NDP group were very happy to accept a) and b) but not c)

It is of huge significance that they failed to give any reason at all in the consultation statement why they should include a) and b) not include c).

This is not a clear or transparent decision, but appears totally arbitrary and unconsidered.

Given the huge lengths they have gone to block our project, it is telling that they can not actually come up with any relevant planning argument to back up their response to exclude community development specifically. I think we have to assume they don't have any real argument to back up their biased view.

I wrote to David Croft when I saw this recommendation from Hereford and suggested it was an idea form of wording that we were all seeking after our NDP/HOV meeting on DECEMBER 2nd 2015.

(See my email to David Croft and his reply Appendix 29.2)

He gave a very unconvincing argument; he appears to believe that just because an NDP Policy says community facilities might be allowed on a site, that planning permission will automatically be granted to a whole "range" of community facilities and that each application would no longer be judged on its merits. This is obviously not the case. There is really no convincing argument given as to why the recommendation from Hereford cannot be accepted.

We all know the reason is just the same preconceived bias.

29.3

FAILURE TO CONSIDER RESPONSES FROM PARISHIONERS:

There were said to be 74 responses from parishioners, but one is missing, (number 44) and there is one duplication. There is one response from the Chairman of the Parish Council to his own NDP, which seems rather odd!

Concerning Policy 8;

There were 19 firm supporting statements for keeping the SGG but 20 respondents suggest Morgan's Field be removed from the gap entirely, 5 question the SGG policy and another 5 are firmly in favour of the HOV project. This shows 30 out of 72 respondents find the SGG Policy 8 unsatisfactory and wish it to be amended.

The most represented view on any issue in the draft has just been ignored.

A small number suggested that East and West Cradley be removed as term. This alteration has been made happily by the NDP group, but they have made no changes to accommodate the view of 30 respondents here to allow HOV to go ahead.

The NDP Consultation Statement says amendments were made “as necessary” (page 8). This is a totally unclear and arbitrary statement and means that the NDP can amend exactly what they like with no criteria set. This not a robust, transparent or open way to produce a planning document, and this failure to respond to the regulation 14 consultation displays their bias yet again. Sam Banks said to the NDP on 2.12.2016;

-“Reg 14 stage [is] critical to pick up problems.”

-“Reg 14 should take into consideration comments.”

-“ Take on board comments. Show the best options. Take the middle ground/balancing conflicting views.”

None of this has happened.

It is worth noting that they DID alter the Strategic Gap significantly in size. It was reduced by more two-thirds of its original size after the Regulation 14 consultation, yet the very small reduction suggested by excluding Morgan’s Field was not considered.

Furthermore, amending the Policy 8 to allow HOV at this stage (either by excluding Morgan’s Field from the SGG or allowing community development) cannot be said to set any precedent for housing development in the remaining gap. It would be a clear amendment to an NDP, due to clear Regulation 14 Consultation responses by both the community and County Council that had been used to inform a NDP policy to permit community development only.

30.0

INAPPROPRIATE INCLUSION OF PLANNING OBJECTIONS IN THE NDP CONSULTATION STATEMENT.

(see The NDP Consultation statement section 7 consultation with HOV group)

This quotes our current planning application saying that 60% of respondents voiced objections.

This is true, however, the vast majority of these objections are copies of, or are closely based on a letter written by the Lead of the NDP’s spouse. He was the leader in an anti-HOV lobbying campaign and

delivered the letters door to door himself. I believe, but may be wrong here, that he even supplied SEAs along with copies of his letter of objection. Furthermore the PC Vice Chairman hosted a vitriolic and very unpleasant anti-HOV website.

It is hard to imagine a more aggressive campaign, which has undeniable links to the NDP group and the PC. Thus, we are not surprised by these objections but do not feel they represent the majority of the parish and surrounding villages who have remained silent on the issue.

It is, yet again, ironic that the NDP will not recognize the HOV survey because we went door to door, but the results of this very professional direct lobbying anti-HOV group appear to be permitted to influence the NDP and even form part of their "consultation" statement.

When asked about its inclusion by a Councillor at a PC meeting, the NDP Lead said it was permissible as it was "in the public domain."

This last point 30.0 sums up the full extent of bias to which our project has been subjected throughout the whole NDP consultation process.

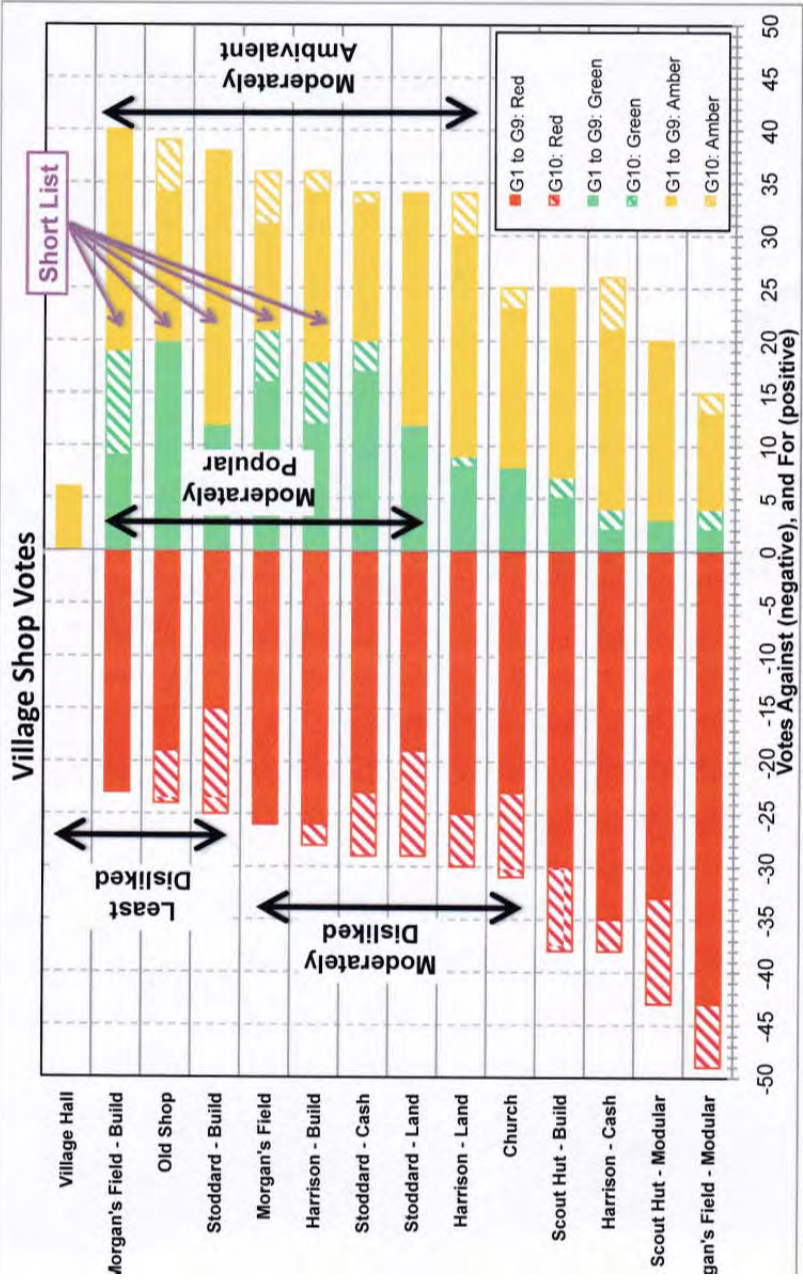
APPENDIX

APPENDIX 4.0

Heart of the Village Meeting 4.8.2014.
 Present 200.

SECTION HEADCOUNT	39	21	70	48	TOTALS	
					178	
who is generally in favour of the idea of a 'Heart of the Village' at Kingsbridge	30	9	35	39	113	63%
who would like to see a community shop & café as part of the facilities	21	9	36	36	102	57%
who would like to see a community pub as part of the facilities	17	2	26	20	65	37%
who would like to see a community hall as part of the facilities	16	5	25	9	55	31%
who would prefer to see the buildings positioned at A	9	4	7	16	36	20%
who would prefer to see the buildings positioned at B	8	3	21	7	39	22%
who would prefer to see the buildings positioned at C	7	1	19	9	36	20%
who is in favour of selling some or all of the Chapel Lane playing field in order to fund or part fund the proposed project	2	1	15	2	20	11%
who is opposed to selling some or all of the Chapel Lane playing field in order to fund or part fund the proposed project	17	17	27	28	89	50%
Who is interested in the prospect of being a shareholder in the proposed project	28	6	33	32	99	56%

APPENDIX 8.0 OPTIONS MEETING RESULTS



APPENDIX 9.0

CPC Meeting 10th March 2015 / 10 A.

NDP Update Report

- Meeting held on 5th March of Steering Group and members of HoV to meet with Carly Tinkler and Paul Esrich of Malvern Hills AONB.
- It was emphasised by email prior to the meeting that the Landscape Assessment is not the NDP. It is a technical document commissioned by the Parish Council jointly with the Malvern Hills AONB. As such it provides a strong evidence base for both the AONB and the Parish Council in considering planning applications as well as guiding policy development for the NDP.
- Carly presented a brief overview of the methodology adopted, the assessment criteria used and how the landscape capacity assessment was undertaken. In summary it was three stages:
 - Definition of baseline which includes assessment of landscape character and other criteria such as ecological value, historical context, flood risk etc;
 - Assessment of landscape value, landscape quality and landscape sensitivity for the area as a whole and for each individual parcel within the area. The sites were ranked in terms of overall sensitivity from a ranking of Moderate to High to a ranking of High to Very High.
 - From a review of the above the individual landscape capacity of each parcel - defined as *'the amount of change a particular landscape type (or area, or zone, or individual site, or town / village) can tolerate without there being unacceptable adverse effects on its character, or the way that it is perceived, and without compromising the values attached to it'* was assessed and the sites ranked in terms of capacity from High ie. Can easily accommodate more development to Very Low to Low ie. Unsuitable for development.
- The results can be summarised as follows:
 - 78 sites/parcels of land were assessed outside the settlement boundary of the village.
 - There is one site of High Capacity – parcel 36 at Farleys due to its proximity to the existing built form.
 - Three sites of Moderate to High Capacity
 - Five sites of Moderate Capacity.
 - Of the remaining the majority are Low to Moderate Capacity or Low Capacity with 14 sites Very Low to Low Capacity ie. have the least capacity for development.
 - No sites are classified as Very Low Capacity.
- In terms of specific sites of interest:
 - Stoddarts field (site 4 in the report) has a capacity ranking of Low capacity with capacity higher along the road frontage opposite Buryfields.
 - Morgan's field (site 61 in the report) has a capacity ranking of Very low to Low Capacity and is identified as the third least acceptable site for development of all 78

APPENDIX 13.0

FIRST NDP QUESTIONNAIRE

CRADLEY PARISH COUNCIL 2015
Neighbourhood Development Plan questionnaire

1. Introduction

As you may know, your Parish Council is preparing a Neighbourhood Development Plan to help shape the future of Cradley and Storrige.

When complete, it will be a statutory planning document valid until 2031. Planners will be legally obliged to have regard to it in reaching decisions over proposed development within the village.

We hope to present the plan to the community in the form of a referendum by spring 2016.

As part of the drafting process, we would like to know whether you think any or all of various commercial and community projects submitted to your council should be included in the plan.

Housing is a particularly important topic. Your council was told by the government to identify sites for just over 100 new homes to be built in the village between 2011 and 2031.

In fact, the number which has been built recently, together with those for which planning permission has been given, roughly equals this figure. **As a result, we don't have to agree to any further housing - though of course we might choose to do so.**

Please help steer the future development of our beautiful Herefordshire village by completing and returning this questionnaire.

As well as your views, your council will also be guided by planning law, previous consultations, previous Parish Plans and by the Landscape Capacity Assessment which was produced for us by Carly Tinkler CMLI, Landscape, Environmental and Colour Consultant. The details are available on our website: www.cradleyparishcouncil.org.uk

2. Development proposals

Your council has received five proposals for commercial or community developments in the village. They are listed below in alphabetical order. The sites of the developments are shown on the attached map.

We hope the following information about each project - provided by those responsible rather than by the Parish Council - will help you decide which, if any, you favour.

You may indicate your support for all, some or none of them.

The Landscape Assessment allocated each parcel of land in the village a level of environmental 'constraint' and the relevant level is shown below each proposal. These 'constraints' are defined as including specially protected areas such as the Area of Outstanding Natural Beauty (AONB), Conservation Area, sites protected by planning policy, designated sites and/or features such as trees subject to a preservation order. These must be taken into account in determining suitability for changes in land use. Then there are other potential 'constraints' including the physical nature of the site such as topography, risk of flooding and other limiting factors such as no access from the highway. Sites are ranked in terms of constraints from 'Very High' - a large number of complex issues to overcome to 'Low' - where development is more straightforward.

2.1 Green Farm Project - OPTION 1.

Proposer's key points

- Development of Green Farm Field and Dilwyns Field for 18 and 25 houses respectively with the provision of the following at no cost to the village;
- Provision of a village shop and community land;
- Provision of car parking, footpaths and bridges to connect the two parts of the village (Green Farm Field with Morgan's Field);
- Village to gain control of residual land on Green Farm Field, to be held as open space, pitches and/or nature walks;
- Clear, direct benefits to community in the form of a village shop and control of residual land at Green Farm Field;
- For more details please visit the proposal's website at www.cradleygreenfarm.co.uk

The Landscape Assessment says the environmental constraints on Green Farm Field are HIGH to VERY HIGH.

The Landscape Assessment says the environmental constraints on Dilwyn's Field are HIGH.

2.2 **Green Farm Project** - OPTION 2.

Proposer's key points

- Development of 25 houses on Green Farm Field, providing bridge and path linkages for the village with control of the residual land at Green Farm to revert to the Village, once the scheme is complete.
- For more details please visit the proposal's website at www.cradleygreenfarm.co.uk

The Landscape Assessment says the environmental constraints on Green Farm Field are HIGH to VERY HIGH .

2.3 **Church Stile Project**

Proposer's key points

- A proposed, controlled and proportionate development for East Cradley, for up to 29 houses that in turn could fund your community-administered amenity.
- With easy access, near our village school, a purpose built Village shop, possible Post Office and 'local produce' micro Farm shop.
- Licensed Café and Family Restaurant as a social venue for family and friends within a landscaped Village green setting.
- Our site offers; minimal impact on added village traffic, the AONB landscape, and indeed you and your village.
- Proven, sustainable, economic and social Business model. Administered by the Community for you.
- Visit www.cradleystores.co.uk for our vision of 'the Possible'. See the site Plans, the proposed building itself and Business model and more before you decide.

The Landscape Assessment says the environmental constraints on Church Stile Field are HIGH.

2.4 **Cradley Sports Club**

Proposer's key points

- Cradley Sports Club was formed in 2005 to address the fact that no sports facilities were available in this village.

- The aim is to provide facilities to enable sport to be played by people of all ages, but primarily young people.
- Currently all our football teams play the majority of their fixtures away from home.
- Facilities are in the planning stage to provide for such an area, to have initially three football pitches on land adjacent to the local Primary school.
- This area will be available to the village to add other sports as the club develops.
- The area will also give the village a large open space to hold other events eg, fairs, carnivals etc., and in addition 37 car-parking spaces.
- For more details please visit the proposers website at www.cradleysportsclub.co.uk

The Landscape Assessment says the environmental constraints on The Sports' Club Field are HIGH.

2.5 Heart of the Village Project

Proposer's key points

- Centrally-located, community-owned shop, café and play area.
- On 3.6 acre community-owned Morgan's Field alongside Cradley Brook.
- Created by and for the community with no links to housing developments and no need to sell village assets.
- Beautiful, purpose-built and environmentally sustainable building with small car park.
- Permanent asset for Cradley and surrounding area, staffed by volunteers supported by a retail manager.
- Space for people of all ages to walk, play, enjoy nature and get to know each other better.
- Details at www.heartofthevillage.co.uk

The Landscape Assessment says the environmental constraints on Morgan's Field are HIGH to VERY HIGH.

3. Questionnaire

Please help your Parish Council produce a Neighbourhood Development Plan that truly represents the wishes of the community by completing this short

questionnaire. Every permanent resident of Cradley Parish of voting age is eligible to fill in this questionnaire.

Answer by circling 'yes' or 'no' after the question. **You may indicate your support for all, some or none of them.**

You may include your name and other details or, if you prefer, respond anonymously.

First name or initials Mr/Mrs/Ms

.....

Surname

.....

Tel. No

.....

E-mail address

.....

Signed

.....

Q1 Do you support further housing development on new sites in Cradley ?

Yes No

Q2.1 Do you support the proposal for 18 houses plus a community shop and café on Green Farm Field together with 25 houses on Dilwyn's Field? (See 2.1)

Yes No

Q 2.2 Do you support the proposal for 25 houses on Green Farm Field? (See 2.2)

Yes No

Q2.3 Do you support the proposal for 29 houses plus a community shop and café at the Church Stile site? (see 2.3)

Yes No

Q2.4 Do you support Cradley Sports' Club's proposal for 3 football pitches and associated parking next to the school? (2.4)

Yes No

Q2.5 Do you support the proposed Heart of the Village community shop and café at Morgan's Field? (2.5)

Yes No

Q3 If you have not supported any of the proposals listed above for a new community shop or café, would you welcome alternative shop/café schemes?

Yes No

Q4 Do you consider the area often referred to as the 'Strategic Gap' or the 'Green Gap' (Green Farm Field on the Map) which separates East and West Cradley should remain as undeveloped farm land, as it is now?

Yes No

Comments

If you have any general comments, please give them below

.....
.....
.....
.....

Please return your response in any of the following ways:

- By Post to: Clerk of CPC, 2 New Cottages, Clenchers Mill Lane, Eastnor, Ledbury HR8 1RR.
- Via the form on our website: www.cradleyparishcouncil.org.uk/
- Via the Parish Council.
- Collections will be made between the 8th and 15th of September.

- Closing date 15th Sept 2015.

APPENDIX 14.0

MINUTES CRADLEY PARISH COUNCIL MEETING AUGUST 11th 2015

CPC MINUTES

August 2015/31

MINUTES of a meeting of Cradley Parish Council held on Tuesday 11th August 2015 in Cradley Village Hall commencing at 7.30pm

PRESENT – Cllrs. C. Lowder (Chair) K. Nason (KN) W. Harries (WH) D. Scully (DS) A. Carver (AC) C. Lambert (CL) F. Beard (FB) D. Pye (DP) K. Welford (KW) G. Thomas (GT) G. Fielding (GF) A. Eldridge (AE) and S. Davies (SD).

Also attending were four members of the public, Cathy Berkeley, Locality Steward with Balfour Beatty and the Clerk.

Apologies for inability to attend the meeting had been received and approved from Cllr. T. Lloyd-Jones and County Councillor P. Morgan.

.....

NDP – In the absence of TLJ, the Chairman advised that the Questionnaire had been finalised for approval by the Council at a meeting of the NDP Group on the 6th August, this having been copied to all Councillors, but added that the format would be changed to enable KN to print it off for circulation. Comments were sought and KN queried the need for including the lengthy proposals of the various developers as he felt there was simply a need to ask four questions –

- 1) Do we want more housing.
- 2) Do we want a shop.
- 3) Do we want sports facilities for the youth in the Village.
- 4) Do we want any building on the “strategic gap”.

GF, a member of the NDP Group was totally against the Questionnaire as drawn and noted that no vote of the working group on the contents of the Questionnaire had been undertaken. He was of the opinion that the document had been manipulated to gain advantage by the various development proposals, who he considered should put their proposals to Herefordshire Council in the normal way and not on the back of the NDP Group, agreeing with KN that all that was required was the four questions listed above. He also drew attention to the Code of Conduct which Councillors had signed up to as he felt the Questionnaire, as circulated, was in contravention of the Code by some members of some of the Parish Council who were also members of the HOV Group.

AE (who declared a personal interest in the HOV Group) commented that the HOV Group had never tried to bring the Parish Council into disrepute and felt that including the various projects put forward in the Questionnaire was an essential part of seeking how Parishioners felt their Parish should extend and develop in the future, as they had identified something which many people thought would be a good idea.

KW felt the questions in the original Questionnaire clarified the options which are available and would stop the rumours and misunderstanding in the Village. He disagreed that the Parish Council are seen to be advertising the various proposals put forward.

General lengthy discussion followed by all Councillors, sometimes quite acrimonious, and the Chairman sought the views of individual Councillors around the table. The Chairman finally commented that the discussions had been positive and had included good arguments, although he personally had not agreed with some of them.

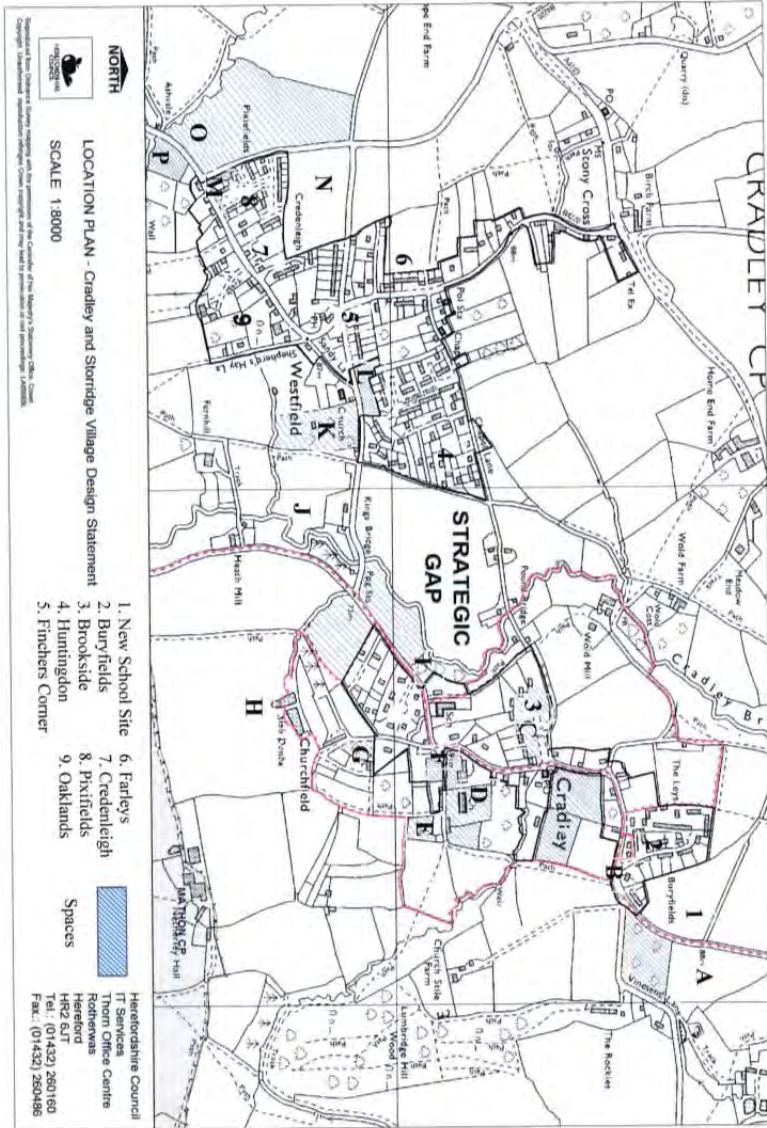
RESOLVED – the Chairman proposed that the Questionnaire should be redesigned to simply ask the four questions indicated, as above, and not include the detailed proposals about the possible four developments. This was seconded by KN, **with AC, GF, DS, DP, GT, CL & FB** in favour of the proposal.

Those against the proposal were WH, AE & KW.

Abstaining from voting were the Chairman and SD.

APPENDIX 16.4.MAP of STRATEGIC GAP. Cradley VDS

7.2 Spaces and housing developments Map 2



APPENDIX 19.0

SCREENSAVE SHOT OF ONLINE QUESTIONNAIRE

CRADLEY PARISH COUNCIL

Herefordshires Largest Parish

Survey

Home
Your Councillors
Your Council
Communication
Diary
Contact
Archives & Information
NDP & Plans
Local Links
Le

NDP Questionnaire

As you may know, your Parish Council is preparing a Neighbourhood Development Plan (NDP) to help shape the future of Cradley and Storridge.

When complete, it will be a statutory planning document valid until 2031. Planners will be legally obliged to have regard to it in reaching decisions over proposed development within the village.

We hope to present the plan to the community in the form of a referendum by spring 2016.

Housing is a particularly important topic. Your council was told by the government to identify sites for just over 100 new homes to be built in the village between 2011 and 2031.

In fact, the number which have been built recently, together with those for which planning permission has been given, roughly equals this figure.

As a result, we don't have to agree to any further housing - though of course we might choose to do so.

This questionnaire is intended to help the parish council to develop a policy framework which reflects the views of our community within which future planning applications can be judged by the Herefordshire County Council Planning Department.

As well as your views, your council will also be guided by planning law, previous consultations, previous Parish Plans and by the Landscape Capacity Assessment which was produced for us by Carly Tinkler CML, Landscape, Environmental and Colour Consultant. **Please help steer the future development of our beautiful Herefordshire village by completing and returning this questionnaire.**

Please fill in the sections of the questionnaire below. Please note that sections marked with * must be responded to. Scroll down to see all of the questions. When you have reached the end type in the code you can see and then click the submit button

Return Deadline 22nd September

Please note some tablets may not allow you to scroll the form

Email *

Questionnaire number *

from the paper form you received

Q1 Do you want provision for an additional Shop? *

Yes

Q2 Do you want provision for sports pitches? *

Yes

Q3 Do you want the strategic gap kept free from development?

Yes

Q4 Do you want restrictions placed on housing development? *

Yes

Innovator design 01588 830452
© Cradley Parish Council

21.1

Date: 1 December 2015 at 17:38:17 GMT

Subject: NDP questionnaire

Dear Mary,

I spoke to Chris Lowder and Ken Nason today and they suggested I contact you about the concerns I have about the conclusions of the recent NDP questionnaire.

1. The answers and comments tell us that 'The village would benefit from a shop serving East Cradley.'

Out of 301 responses 153 were positive. Of these 12 indicated East Cradley as a preferred location.

Please would you let me know what data was used to form the above conclusion?

Also as this was not the question asked is this a valid policy implication or consideration?

I am disappointed that this was reported in a prominent position in the Newsletter and the web.

3. I found this question unclear as to the meaning of 'development' as it could mean either 'houses' or 'shop'. I am unsure how I responded. However, I did complete the comments section. Has this been taken into account if people answered 'no' for development but commented in favour of a community shop in SGG?

The comments received were 2 to 1 in favour of using the SGG for location of a shop. This has not been reported in the Newsletter although the numbers are 33 as against 12 for question 1 which

resulted in a valid policy recommendation.

Also it appears that people commented on more than one of the questions so has this been taken into account when assessing the level of support for these important decisions?

Please would you forward to the relevant committee?

Many thanks

[R]

21.2

Date: December 4, 2015 at 11:39:02 GMT

Subject: Re: NDP questionnaire

I have had an acknowledgement from Mary but nothing in writing from Ken. I did speak to Chris and Ken in detail about my concerns. They certainly took them on board and Chris would have liked it if I could have contacted him earlier but I didn't see the results until I got the Newsletter on Tuesday.

I did speak to Anne in the evening before the meeting and I felt that she had been alerted to my concerns. She said that she had been speaking to people that day about the questionnaire and that she felt that HoV should be more prominent in the results and acknowledged some of the shortcomings and difficulties. She recognised that it is important to get the final policy right representing the majority view in order to get the 51% approval required.

I think it will be difficult for them to answer my first concern about East of Cradley being flagged up and it is a shame that it was

published in the Newsletter because it will have an influence on people.

I think to analyse the data accurately will require sight of the individual responses because cross referencing with the comments may be required for accuracy. Some of the questions also were not clear.

I may be able to look at some of the data at home depending when this would be required. I have had some experience in data analysis and questionnaires.

Best wishes

[R]

APPENDIX 23.0

The Heart Beats On January 2016

Survey Results

At the beginning of the autumn we had a very important decision to make. Turning the idea of a new café, shop and green space for our local area from theory into reality is going to involve significant funding, time and creative planning. We had come so far – but was there really enough support for the project to press on?

So we decided to ask as many local people as possible for their views on The Heart of the Village project. Thank you to everyone who completed the survey and to the army of volunteers who delivered forms to as many households as possible. If you didn't get the chance to answer the questions, we would still love to hear from you. We would particularly like to thank those who took the time to talk to us on their doorsteps. Whether you did or didn't support the the project, these conversations were informative and helpful.

Details of all the responses received by Monday 7th December are:
Parishioners of CRADLEY and STORRIDGE;

Q1. Do you support the proposal
for a Heart of The Village at
Morgan's Field?
YES 192 NO 36

Q2. Would you be interested in

being a volunteer to help in the shop/cafe?

YES 86 NO 104

Q3. Would you be interested in buying shares in Heart of the Village (£10 minimum)?

YES158 NO 32

1. Of those responding, 86% supported a new café, shop and green space on Morgan's Field.

2. 86 people confirmed they would like to volunteer as helpers.

3. 158 people said they would buy community shares in the project.

We have been greatly encouraged by the results. Our question has been answered.

There is enough support for a new Heart and we will work hard to complete the project for our community.

Herefordshire Council Planning Department has already given the project favourable pre-application planning advice and we are now commissioning a traffic survey and a flood risk assessment. If all goes well, we plan to submit a planning application during 2016.

We hope all those who are interested in a new Heart will help design the building in more detail and will let you know how you can continue to be involved through this newsletter, the website (www.heartofthevillage.co.uk) and facebook. And if you would like to play a bigger part in taking the project forward, call any member of the Heart of the Village project team.

Happy New Year.

APPENDIX 24.0 MEETING WITH SAM BANKD HEREFORD NDP TEAM

24.1 HOV SUMMARY OF MEETING;

9th November 2015

Dear Sam and Karla

Thank you both for your time this afternoon. We were heartened that you understood our concerns. Below are our main points:

Cradley Parish Council and the NDP group have not adopted a positive planning approach and have not been inclusive of the community contrary to Hereford's own guidance notes. There is a desire for more facilities within the village which

CPC/NDP have not adequately consulted about given the various options proposed.

Instead of trying to work with a community led project CPC/NDP have become increasingly hostile and openly antagonistic towards HoV. The sports club has faced similar issues but has kept a lower profile.

The NDP are happy to proceed with the draft of NDP as they feel they have demonstrated over 70% support for no development in the 'strategic/green gap' area, however, this contrasts with HoV data which shows 86% support for a community shop and cafe in the same area.

The first NDP draft has included policies CSNDP5 and CSNDP6 which both state areas are "protected from all development except that which may be required to mitigate flood risk". These policies will prevent HoV and that is contrary to Hereford's NDP guidance which states: "Neighbourhood Plans cannot: conflict with policies within the local plan (Core Strategy) or Be used to prevent development."

We would appreciate it if you could offer advice to Alan (as a member of the NDP and a Parish Councillor) for him to share during the Parish Council meeting tomorrow night.

kind regards

alan, sarah and tracey

APPENDIX 24.2 RESPONSE FROM SAM BANKS

10.11.2015

Subject: FW: NDP Concerns

Dear all,

We acknowledge your concerns regarding the production

of the Cradley Neighbourhood Plan. An officer from the Neighbourhood Planning team will continue to work with the parish council ensure that the required regulations are met prior to the submission of the final document for examination.

Neighbourhood Plans are documents produced by the parish council on behalf of the community. They can include a range of development proposals including housing, employment, community facilities and open space together with a number of criteria based policies. Once adopted, the neighbourhood plan will form the statutory planning document until 2031. Therefore any appropriate development issues and needs should be addressed either via a policy allocation or criteria based policy.

The development of a neighbourhood plan should include consideration of a range of options. These will help formulate the best solution of the issues highlighted and will be assessed through the Strategic Environmental Assessment.

The team always stress the importance of community involvement and consultation during the production of a neighbourhood plan and this will need to be demonstrated within a Consultation Statement submitted to the

examinations.

Without full and extensive consideration of options and consultation, there is a risk at the referendum if the community feel disenfranchised for the process.

Obviously our concern is to facilitate a successful adoption of a neighbourhood plan for your area and to highlight any risks within the process prior to the examination and referendum. Our role is not to 'police' any decisions made by the neighbourhood planning group or the parish council.

I hope this helps clarify the process requirements.

Kind regards **SAM**

APPENDIX 26.3 NDP AND HEREFORD COUNCIL NDP TEAM MEETING; Transcript of part of tape recorded and written by AE;

ALAN. How would you advise the NDP group to look at the Statistics from the HOV questionnaire.

SAM. Have they got access to that?

(a discussion followed regarding whether or not the NDP had seen the results. I read the results out.)

SINEAD. How does extra information like that feed into the process?

SAM. We are where we are with the fact that 2 questionnaires

went out simultaneously and we can't change that, can't change the results of that but I think, moving forward when you do this bigger consultation before the official '14', if this is a contentious issue which obviously it is, its probably one of your more contentious issues, is to have a consultation on that, where you are not having two things go off on two separate - try and come together however difficult that may be, to ask a set of non leading questions on that issue. On the named/un-named, as far as planning regulation, any body can make a comment, they don't have to say who they are. You would have to keep it open, I don't think you can probably on a general questionnaire say you have to tell us.

GEOFF F. Can non-trained interviewers go around and be relied upon to deliver questionnaires? (I've shortened his question.)

SAM. Other parishes have gone round and knocked doors to try and get responses and support. What they haven't done is sort of sat there while people have filled it in. They have probably gone, dropped the questionnaire off, given them a bit of a flavour of what it's about - NDP, policies, then said have a read, I'll be back on Tuesday to collect. It's not a....(TANYA-Lobbying exercise)..no, no.

GEOFF F. So what happens if someone lobbies and there is evidence?

SAM. Try to avoid leading.

GEOFF F. What if that has happened.

TANYA. That is what I have to say probably invalidates 'that' evidence because we know for a fact...

SAM But at the moment, your plan is not based on 'that' anyway. On your next consultation, do that but make sure that when you send them out, if you are going around people, it is just that, to try and encourage people to fill it in, rather than what they actually tick on the form.

NDP UPDATE TO CRADLEY PC 12th JANUARY 2016

NDP UPDATE CRADLEY AND STORRIDGE PC MEETING 12TH JANUARY 2016

1. Key points from meeting with HCC NDP Team

The headline issue emphasised by HCC is that without a valid NDP in place, Cradley does not have a settlement boundary. Once the Core Strategy was approved, all UDP policies were revoked and therefore have no relevance. This means Cradley is vulnerable to any speculative developer that wishes to put in an application and only national and Core Strategy policies apply.

Consultation

- There are no set parameters for undertaking consultation. The key issue is for it to be recorded in the consultation statement in the NDP and that it comprises more than 'a couple of men and a dog in a barn'
- It can include any number of methodologies and all are appropriate i.e. questionnaires, public meetings, inviting online comment etc. Questionnaires are the most popular because the results can be quantified and easily documented. It was made clear by HCC that door to door survey with a potential to influence by the surveyor is not good practice and cannot be accepted as objective evidence.
- On the basis of what was discussed and the overview of the consultation undertaken to date, HCC said that consultation would not be identified as an issue at either the statutory submission stage or the inspector's examination. The only concern is that a disenchanted interest group could cause the plan to be rejected at referendum, through lobbying for a vote to reject it. This would mean that the NDP could not be resubmitted for 2 years unless fundamentally revised.
- NB. *To date the majority of plans submitted have gone through with substantial approval on low turnouts – only one was tight but still was approved.*

Housing

- In response to a question by David Crofts, HCC confirmed that given the committed developments in place in Cradley PC (ie. Approximately 90) and the shortfall of approx. 13 houses, HCC would not expect to see specific sites identified for housing and it is sufficient to rely on windfalls to make up the shortfall. The NDP should provide evidence to support the history of windfall development in the parish.
- HCC also advised that a high level criterion led plan was acceptable and there was no requirement to produce a plan with detail of options for housing or other initiatives.

Storrige

- Concerns were raised by Seonaid about the status of Storrige and specifically not having a settlement boundary. HCC made clear the following with reference to the Core Strategy:
 - Policy RA3 protects against housing development in the open countryside unless for agricultural purposes or reuse of redundant buildings;

- Policy RA2 identifies the villages that have been identified for proportional growth – this includes Cradley but does not include Storridge, and it is therefore not relevant for Storridge to have a settlement boundary.

Timeline going forward

- HCC are to review the plan and will provide initial comment before Christmas.
- HCC recommended resolving through further engagement the issue with the interest group and suggested consultation on the specific policy that is under dispute i.e. the strategic gap policy. The aim should be to do this in the new year.
- Aim for Draft submission (Reg 14) in February for 6 weeks consultation inviting comment from the Parish by making available in public locations i.e. both village halls as well as on website. Responses will be direct to the PC in writing.
- Following any amendments required (by early April), the NDP will then be formally submitted for statutory consultation (Reg 16) which will be also 6 weeks.
- Following this it will be sent to the inspector (Reg 17) – approximately June/July.
- Referendum in September.

2. Feedback received from Karla Johnson of HCC

As promised, Karla Johnson of HCC provided feedback and comments on the draft NDP as follows:

'A good start to your plan, all of the format and topics are there. Overall I think the plan is on the path to be in general conformity with the basic conditions, providing you relate your plan closer to the Core Strategy. Further testing will happen from HC Policy Team at reg 14 consultation stage.'

She made various specific comments and suggested amendments throughout the plan, but nothing significant in terms of overall structure and content.

3. Next steps

- Meeting with Heart of the Village group on 14th January to discuss 'contentious' policy.
- Commission David Crofts of Escourt Planning to address Karla's comments and prepare the plan for approval at the next PC meeting on Feb 9th to go forward to Reg 14 Draft submission i.e. available to the parish for public comment.
- Meet with HCC NDP team on 19th January to identify opportunities for funding.

APPENDIX 27.0 JANUARY 14th 2015 MINUTES OF MEETING NDP AND HOV GROUPS.

MINUTES of a meeting held in Cradley Village Hall on Thursday 14th January 2016 commencing at 6pm.

Present – Alan Eldridge (spokesperson - AE) Kevin Welford, Sarah Herriot, Michael Plant and Wynne Harries on behalf of the HOV group.

Also attending – Tanya Lloyd Jones (spokesperson- TLJ) Anne Carver, Anne Scarsbrook, G. Fielding and Jeff White on behalf of the NDP group.

Also attending were Ken Nason (in the Chair on behalf of the Parish Council) and the Parish Council Clerk.

The Chairman sought details of the precise problem which seems to have occurred between the two groups – AE replied that the only problem was the precise wording regarding the strategic gap as follows ***“the strategic gap, depicted on the proposed map is defined between Cradley and Westfields and it is protected from all development except that which may be required to mitigate flood risks”*** which would in effect bar the proposed project put forward by the HOV.

AE commented that whilst the members of the HOV obviously fully support the NDP for the benefit of the Parish, they would also like to see a little more flexibility in the wording which would give consideration for a particular project on Morgan’s Field if the Community wanted one. He felt the existing wording was designed to exclude all development but hoped that agreement could be reached at the meeting which might take into account their proposals for a community owned project without weakening the resolutions in the NDP policy document. When queried as to why the HOV group had not deposited a planning application for their proposal on Morgan’s Field, AE replied that they were not at that stage ready to do so. They had however taken up pre planning advice and added that whilst they do not legally own the field , certain issues have now been resolved with Solicitors and they are now clear to go ahead.

On behalf of the NDP Group, TLJ advised that they could not support the HOV proposal as the NDP do not have the evidence which the HOV group say they have received, and can only use the particular evidence received for the NDP and added that as the group were not accommodating individual projects, a special case could not be made for the HOV. Any proposal has to conform with the policies in the plan based on evidence collected over a five year process, and stressed that whilst there is no NDP in place, since the Core Strategy was accepted by Hereford Council, Cradley remains open to any developer putting forward plans for development to Hereford Council and this would also apply to the HOV Group.

Lengthy discussion followed and it was eventually agreed that the Parish Council should consult their Planning Consultant to see if he can come up with some wording which allows or assists Morgan’s Field being used as a community project which in no way compromises either the NDP or the strategic gap, adding that whilst it was appreciated that the Tattenhall policy is somewhat loose ie ***“green spaces will be afforded protection from new development unless***

exceptional circumstances demonstrate that proposal should go ahead" it was hoped that he might be in a position to come forward with an alternative proposal, giving us both solutions and also to advise us on any risks which may be involved, adding that if amending the wording of the policy is inappropriate, are there words which could be included within the justification text for the policy which would not materially weaken the intention of the Policy? The parcel number for Morgan's Field as listed by Carly Tinkler is 61. The Clerk was to circulate proposed letter to the Chairman and both spokespersons for approval prior to submitting the query to David Crofts. The meeting closed at 7.35pm.

Signed..... Dated.....

27.1 BRIEFING LETTER SENT TO DAVID CROFT ON 16/01/16:-

Hi David,thank you for acknowledging receipt of your cheque.

A meeting was held on the 14th January between members of the HOV Group, the Parish Council NDP Group with the Vice Chairman of the Parish Council in the chair and also attended by myself as the Parish Clerk.

The Chairman sought details from the HOV spokesperson of what was considered to be the precise problem, and it was reported "that the green gap depicted on the proposed map is defined between Cradley and Westfields. It is protected from all development except that which may be required to mitigate the flood risk".

The HOV group commented that they would like to see changed wording, not to allow any old development, but to permit a specific project if the Community wanted it.

After lengthy discussion, it was agreed that the Parish Council seek the advice from yourself as their Planning Consultant - and I quote "to see if you can come up with some wording which allows or assists Morgans Field being used for a community project which in no way compromises either the NDP or the strategic gap".

Whilst it was appreciated that the Tattenhall policy is somewhat loose ie "green spaces will be afforded protection from new development unless exceptional circumstances demonstrate that proposal should go ahead" it was hoped that you might be in a position to come forward with an alternative proposal giving us both solutions and also to advise us on any risks which may be involved. If amending the wording of the policy is inappropriate, are there words which could be included within the justification text for the policy which would not materially weaken the intention of the policy?.

The parcel number for Morgans Field as listed by Carly Tinkler is 61. We look forward to your valued advice in due course.

Thank you, Mary, Clerk to Cradley PC.

27.2 REPLY FROM DAVID CROFTS

From: [David Crofts](#)

To: ['Mary Barnett'](#)

Sent: Wednesday, January 27, 2016 11:40 AM

Dear Mary

I am on track to send you the revised version of the Plan incorporating the amendments suggested by Herefordshire Council by the end of the day tomorrow.

In the meantime I have given further thought to ways in which the Heart of Village proposals might be accommodated in the Plan.

I am afraid I have concluded this would be very difficult to do, but I hope it might help if I were to set out my reasons.

The starting point is to consider the implications of the amendment to the draft Green Gap policy which Messrs Harries and Eldridge put forward. Such an amendment would undoubtedly support the proposals on this particular part of the proposed Green Gap, but would also encourage similar (and perhaps other) kinds of development anywhere in the Green Gap. This would negate its purpose entirely.

Samantha Banks was very clear at the meeting on 2 December about the need for the NDP to conform with the Herefordshire Core Strategy. I doubt very much whether a policy amended in the way suggested would be found to be

in conformity.

The other way forward would be to allocate in the NDP this particular parcel of land for a community facility. However, since a significant part of the field in question lies in an area of flood risk, Herefordshire Council is unlikely to support its allocation for this or any other purpose. Flood risk is one of areas of policy for which requirements are laid down nationally, giving local planning authorities very little flexibility or discretion.

All this reinforces my view that the only way in which the HoV project could reasonably be promoted is by means of a planning application. I do not know whether the HoV group has appointed an architect, but I think they would at least need an illustrative masterplan to make any pre-application discussion with Herefordshire Council fruitful.

Finally I'd like to say that I have no wish to undermine what in principle could be a very beneficial proposal, but what I have written above represents my considered professional opinion.

Kind regards

David

27.3 MY RESPONSE

1 Feb 2016 13:37

Dear Mary,

I understand there is a meeting of the NDP group tomorrow to discuss David Croft's response to the HOV request to be accommodated in the NDP. I have received a copy of his response sent to you (dated Wednesday 27.1.2016)via Alan.

David has given his professional opinion, but I think he may not have got all the relevant facts before him.

1. We have already sought pre application planning advice from Hereford planning department and they have given us advice that our application would be likely to be recommended for approval. This is attached below.

2. The HOV cafe and shop is planned to be built in Flood Zone 1 only, in the upper part of the field. Having spoken to the Department of the Environment , they say they do not have any specific worries about non-residential building here and a Flood Risk Assessment would be required.

I wonder if David needs to be aware of these facts so he can look again

at the issue before Tuesday's meeting. I hope you will be able to forward this email to him today.

27.4 RESPONSE FROM VICE CHAIRMAN PC

1 February 2016

Hi Sarah. in the absence of Tanya from her keyboard, and in light of your response to David's comments so close to the meeting I thought you needed to be contacted.

The meeting is not solely to discuss Davids recommendations based on the questions formulated with and agreed by HOV at the last meeting but other matters. (agenda on web site)

David has been fully briefed on all aspects of the NDP and has used his professional judgement in arriving at his conclusions. (which, is what we pay him for after all)

Whilst you have laid out your (HOV) consultations on the scheme which I am sure will hold you in good stead and be used in any application you decide to pursue there appears to be no relevance to the NDP. You will recall that the NDP is a policy framework within which the growth of Cradley Parish can be guided and shaped until 2031 and beyond. It is not a list of projects that may or may not happen within the Parish.

There is nothing within the NDP that prevents projects such as the HOV from happening. It might be that the constraints of the NDP may make such a scheme harder to attain if it conflicts with the NDP. All projects will of course have to meet the requirements of planning but that is the same for all schemes.

I hope this helps answer your email somewhat.

Ken
Vice CHair

27.5 MY RESPONSE

1st February 2016

Dear Ken,

Thank you for your email reply, but I feel it does not cover the specific issues I raised .

David Croft has suggested a way forward might be to allocate this parcel of land for a community facility. He then gives two reasons why

this is not possible:

1. That Hereford Planning department would not allow such a project on the site.
2. That the site proposed is in a high risk flood area.

My email contains two specific facts relating to the reasons he gave which may possible effect his considered profession opinion on such an allocation:

1. Hereford Planning Department have given pre app advice that they would recommend approval for our proposals.
2. Our proposed site is in Flood Zone 1, low flood risk area.

I feel strongly that he should know both these facts, which , from the answers he has given , it is apparent that he does NOT currently know. I do feel he should be in receipt of such facts and that he should indeed be fully briefed in relation to the matter you have asked him to consider ie the response to the request that HOV proposals might be accommodated in the Plan.

I can see no reason why you can not forward my email to David Croft and allow him the courtesy of making his own professional judgement . Many thanks. Sarah

27.6 DAVID CROFTS SECOND RESPONSE (to my email of 2.2.2016) Dear Mary

I write to take up the issues raised by the pre-application response from Herefordshire Council. I was aware that HoV had had some kind of discussions with the Council, but I was not aware of the content or even the existence of the letter of 9 October.

This alters the case somewhat. Going back to my e-mail of last Wednesday, I still think that any change to the proposed Green Gap policy which might permit development anywhere in it is a bad idea.

In a way the letter does lend support to the idea of allocating the site in the NDP. However, I have two further concerns. First, the response is thin. Other than a Flood Risk Assessment, it does not mention the other documents which might be needed to accompany any planning application; these would include a Design and Access Statement (essential) and Landscape and Visual Assessment and Planning Statement (both highly desirable). The letter does of course end, as it should, with a without prejudice disclaimer. The views expressed in it might not be shared by other planning officers. I certainly gained this impression at the meeting with the Neighbourhood Planning officers on

2 December.

Secondly (and perhaps in contradiction to the first point), if the Council anticipates a favourable recommendation for a planning application, is an allocation in the NDP needed at all?

I appreciate that this may not get anyone very much further, but I hope that you can circulate this as widely as you think appropriate so that it might help the discussion of the NDP group this evening.

Looking ahead, I should be grateful if someone could let me know the outcome, and if it would assist I should be happy to attend next weeks meeting of the Parish Council if you think fit.

Kind regards

David

27.7 RESPONSE FROM VICE CHAIRMAN PC

Sent: Wednesday, February 03, 2016 10:04 AM

Subject: Re: Heart of Village

Thanks Mary for the information from David. My observations from the point of chairing the NDP in Chris's absence is as follows.

1. David still is still not able to support compromising the strategic gap within the NDP policy by allocating the land to specific use.
2. Whilst the HOV have now given details of advice given to them by Hereford Planning (some months after receiving it) this is purely advice and not a guarantee of acceptance. As stated by David it is uncertain as to whether the advice would be viewed in the same light by other planners. As stated by the planner the advice was given in the light of information received by them and in the absence of an NDP for Cradley There is no indication or reference as to what this information supplied was.
3. As stated, with what has been presented as support for the scheme by planners if certain there is no need to have the development included in the NDP anyway as planners will support it. The NDP has within it the specification of the desire by the community to have a second shop in

the village. **No** projects have been included in the NDP by design. It is for the HOV to present their scheme to the community for their approval and support to the level required to obtain the necessary planning permission. Whether this is done before or after the acceptance by the community of their NDP is of course a decision that the HOV has to make

4. The integrity of the NDP cannot be jeopardise by having contradictory parts. This is the advice given by the planning consultant on several occasions including when having received the provided information from planners.

I feel that the Parish Council would be remiss in its duty to the community to a) ignore the professional advice given to them by the consultant employed b) attempt to change in any way the democratic voice of the community as expressed in the questionnaire by compromising its desire to protect the strategic gap

Ken
Vice Chair

APPENDIX 29.2 EMAIL TO DAVID CROFT JULYB19th 2016

Dear NDP team,

We have seen the new proposed draft of the NDP version 5.
We see that the Policy CSNDP8 has been altered.
This is obviously been changed as the policy was said by Herefordshire Planning Policy Department NOT to conform to core Strategy and that the Development Management Department suggest it was too restrictive and that the wording should be altered to include that which could a) reasonably required for agricultural and forestry purposes
b) Public open space
c) Community facility (or facilities)

We note that the policy has been altered but only the first two of the three suggestions of the Development Management Department have been included.

You will remember that on January 14th 2016 the NDP Group met with the HOV Group and tabled a letter to David Croft to ask him to come us with

suitable new wording for the Strategic Gap Policy to allow the HOV project to not be stopped in its tracks by the NDP . I quote:" to see if you can come up with some wording which allows or assists Morgan's Field being used for a community project which in no way compromises either the NDP or the strategic gap". You will also remember that David Crofts was unable to come up with any suitable wording.

It would seem that the suggestion by the Development Management Department for community facilities to be allowed in the Strategic Gap fulfils the requirement we asked for perfectly.

There is no reason in any of the questionnaires, past or current, or in any parish documentation used to inform the NDP, that would prevent the suggested wording c) being added to Policy CSNDP8. It is hard to see any justification by the NDP group to accept the wording for two of the suggestions and for omitting the third suggestion.

We look forward to the full adoption of the three suggestions by the Development Management Department in this draft of the NDP which would meet fully the requirements discussed on January 14th 2016.

Yours sincerely

Sarah Herriot

Secretary HOV

On behalf of the HOV Team.

REPLY FROM DAVID CROFTS JULY 19th 2016

Dear Tanya

I have looked carefully at the matters which Sarah Herriot has raised. The main issue arising as I see it is as follows.

The three categories of exceptions which the Development Management Team suggested for draft Policy CSNDP8 are quite different. Development related to agriculture is covered by the phrase "reasonably required". Any such proposal which requires planning permission would have to be justified in a planning statement or equivalent. Public open space usually means a minimum of built development, if any at all. Community facilities however cover a much wider range of possibilities, including those involving (for example in the case of the HoV application) a significant amount of built development. I have to say that I was

surprised that the DM Team commented as it did, bearing in mind the range of possibilities which “community facilities” might entail, and the principle (which the DM Team should be the first to uphold) that every planning application should be determined on its merits. On that basis, it is quite legitimate for the Parish Council to be selective in its acceptance or otherwise of the DM Team’s comments.

I also note that the HoV application has still not yet been determined. I am sure that you are keeping a close eye on the Council’s website. The number of representations has now reached 381. The last to be posted (when I looked just now) is from the River Lugg Internal Drainage Board, but this relates to a different proposal. It can be ignored. I have no doubt however that the NDP Group and Parish Council are aware of the response of the AONB Unit of 19 April and the comments of the Landscape Officer dated 25 June.

Finally, there is no question of the NDP stopping the HoV proposal in its tracks. The planning press has recently provided many examples of NDPs which have reached a more advanced stage than this one being accorded little or no weight in decisions on planning applications or appeals. As a matter of principle, it is disappointing that the Council has taken so long with the HoV application – now four weeks over its target date of 22 June – but it still remains likely that it will be determined before the Examiner starts work on the NDP.

I hope that the NDP Group will find this helpful in its deliberations this evening.

Kind regards

David

David Crofts MRTPI
Director

Latham, James

From: Sarah Herriot <sarah@heartofthevillage.co.uk>
Sent: 09 November 2016 16:05
To: Neighbourhood Planning Team
Cc: Hughes, Geoff
Subject: Cradley NDP Regulation 16 QUERRY.

Follow Up Flag: Follow up
Flag Status: Flagged

Hope House Farm
Cradley
WR13 5JQ
November 9th 2016

Dear Neighbourhood Planning Team,

I have just submitted my response to the Cradley NDP Regulation 16 consultation. You will see that my response is deeply critical of the plan's consultation process and that I argue that it does not reflect the views of the parish. Evidence that is biased and neither robust or transparent has been used to inform the plan.

I wish to clarify with you how a NDP group is held to account for its consultation process in the production of a statutory planning document.

- Sam Banks has already told us that the role of the Neighbourhood Planning team is " not to police any decisions made by the NDP group" in an email to us in November 2015.

-I have read the NDP Guidance Notes number 4 on your website which say:
"Stage 4...Upon receiving a submitted plan, the Neighbourhood Planning team are then responsible for checking that all the required regulations have been met including consultation and publicity.
A plan can be declined if it does not meet the required regulations.This is not a judgment about the content of the plan the but the process has been undertaken.
If the plan meets all the requirements it will then be published for 6 weeks for representations..(Reg16)"

As the Cradley NDP has not been declined and has already been put forward for its regulation 16 consultation it must be presumed that your assessment of the process of consultation has been made already too.
Who was "responsible" for making this " judgement about the process undertaken" and where can I see a copy of this judgment?

Also, it seems illogical, if not frankly impossible, to make such a judgement at this stage, as one can only asses the consultation process on the basis of the NDP group's own Consultation Statement at this time. One cannot possibly assess the views of the parish on how the regulation 14 consultation process itself has been dealt with, as these views can obviously only be put at the Regulation 16 stage, which closes today.

I and other parishioners not only have concerns about the earlier consultation process but have major concerns about the NDPs response to the Regulation 14 consultation also; I hope you can reassure me that there will be a further full and robust scrutiny of the whole consultation process used to inform this plan before it is recommended to progress to the examination stage. I also hope you can reassure me that the responsibility for undertaking judgement about the consultation process will be done by someone completely independent from any planning officers who may have assisted the Cradley NDP team or been involved in its production.

NDPs are a mainstay of the Localism Act and depend on the process of open, fair and transparent community consultation. Furthermore, rigorous assessment of this process itself must also be made, and be seen to be made in an open, fair and transparent fashion too.

I am copying this email to Mr Geoff Hughes, Director of Economy And Communities and Corporate, as the guidance notes say he has to give his final approval for the plan to be recommended for the examination stage.

I would also ask you to attach this letter to my full Reg 16 submission.

Many thanks for your help,
I look forward to your reply.

Yours faithfully

Dr Sarah Herriot.

Sent from my iPad

Neighbourhood Development Plan (NDP) – Core Strategy Conformity Assessment

From Herefordshire Council Strategic Planning Team

Name of NDP: Cradley & Storridge- Regulation 16 submission version

Date: 29/09/16

Draft Neighbourhood plan policy	Equivalent CS policy(ies) (if appropriate)	In general conformity (Y/N)	Comments
CSNDP1- Settlement Boundary	RA2	Y	
CSNDP2- Housing Provision	RA2, RA3	Y	
CSNDP3- Economic Development	RA4, RA5, RA6, E2, E3, E4	Y	
CSNDP4- Community Facilities	SC1	Y	
CSNDP5- Area of Outstanding Natural Beauty	LD1, LD2	Y	
CSNDP6- Local Wildlife Sites	LD2, LD3	Y	
CSNDP7- Areas of Flood Risk	SD3	Y	
CSNDP8- Strategic Green Gap	LD3	Y	
CSNDP9- Design	LD1, LD4	Y	
CSNDP10- Conservation Area	LD1, LD4	Y	
CSNDP11- Protected Area of Open Space	OS3	Y	
CSNDP12- Recreational Open	OS3	Y	

Draft Neighbourhood plan policy	Equivalent CS policy(ies) (if appropriate)	In general conformity (Y/N)	Comments
Space			

Other comments/conformity issues:

Issues identified at regulation 14 draft stage have been resolved, no issues of conformity have been found.

11 November 2016
Our ref: Herefordshire 20

Dear Sir/Madam

Cradley Regulation 16 Neighbourhood Development Plan consultation

Thank you for giving Severn Trent Water the opportunity to comment on your consultation. We currently have no specific comments to make, however we have set out some general information and advice below.

Position Statement

As a water company we have an obligation to provide water supplies and sewage treatment capacity for future development. It is important for us to work collaboratively with Local Planning Authorities to provide relevant assessments of the impacts of future developments. For outline proposals we are able to provide general comments. Once detailed developments and site specific locations are confirmed by local councils, we are able to provide more specific comments and modelling of the network if required.

For most developments we do not foresee any particular issues. Where we consider there may be an issue we would discuss in further detail with the local planning authority. We will complete any necessary improvements to provide additional capacity once we have sufficient confidence that a development will go ahead. We do this to avoid making investments on speculative developments to minimise customer bills.

Sewage Strategy

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

Surface Water and Sewer Flooding

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

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

Water Quality

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

Water Supply

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

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

Water Efficiency

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

We recommend that in all cases you consider:

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

We hope this provides you with useful information and look forward in receiving your detailed proposals at your earliest convenience.

Yours sincerely

Dawn Williams

Water Efficiency and Growth Advisor

growth.development@severntrent.co.uk

November 8, 2016

Dear Sir

Cradley Neighbourhood Development Plan: Regulation 16

I am a member of Heart of the Village (HoV) team. The idea for a community shop and cafe in the heart of our village was suggested to the community back in August 2014 - a year after the closure of the old village store and post office.

The concept was met with a mixed, but mostly positive response and so the idea was explored further. The HoV team met with community support groups - Community First and Plunkett Foundation - both of whom emphasised the need for the project to be included within the NDP.

The NDP team is headed by the most vocal opponent of the HoV project and they have done everything possible to ensure the NDP not only does not include any facility to help this community project but that it will prevent it!

The Reg 14 draft of the NDP, Policy CSNDP 8: Strategic Green Gap, was written in a way which would have prevented HoV. Hereford Council's feedback was that the policy was too restrictive and suggested the policy allow development for:

- that reasonably required for agricultural and forestry purposes;
- public open space;
- that needed for community facility or facilities.

The NDP team have chosen to incorporate the first two points into the Reg 16 draft but have not included the final bullet which amounts to preventing HoV.

Cradley Parish Council only agreed to produce an NDP to enable them to stop development and to obtain more CIL funds should any development happen - the chair of CPC told me this himself. The whole process has been cynical and dishonest.

Take the following statement as an example:

3.1 Vision

The Parish Plans and Village Design Statement make it clear that the Parish Council wishes Cradley to continue to thrive as a vibrant and distinctive place, to continue to respect and reflect the views of its community, to evolve while retaining its unique and distinctive character, and to provide an outstanding quality of life for current and future generations of residents.

The Parish Council will do this by:

- Encouraging a thriving and prosperous community that delivers a high quality of life for all its residents
- Promoting a distinctive and flourishing local economy that exhibits vitality and dynamism

Heart of the Village is a community-led project that could help the 'local economy flourish' and 'encourage a thriving and prosperous community' yet the Parish Council has done nothing to help this project succeed - quite the opposite. When, after weeks of HoV team members negotiating with the NDP group to circulate a comprehensive questionnaire to truly establish community requirements, the Parish Council discarded the questionnaire and a simplistic, ambiguous set of

questions were asked instead. The HoV team distributed its own short and clear questionnaire to which the Parish Council publicly stated: "Please note that there are several leaflets/questionnaires circulating around the community at the moment which appear to be causing some confusion. These are produced and distributed by independent groups and are nothing to do with or connected in any way with the NDP questionnaire. The one included here is the only questionnaire that will influence the NDP." The data the HoV team collected was every bit as valid as that which the NDP group collected but they have consistently refused to acknowledge it.

Until Cradley Parish Council and its NDP team are prepared to work openly and honestly with the community I believe the NDP should be rejected.

Yours faithfully

Tracey Iwanczuk

Latham, James

From: donotreply@herefordshire.gov.uk
Sent: 08 November 2016 17:47
To: Neighbourhood Planning Team
Subject: A comment on a proposed Neighbourhood Area was submitted

Comment on a proposed neighbourhood plan form submitted fields	
Caption	Value
Address	
Postcode	
First name	Tanya
Last name	Lloyd Jones
Which plan are you commenting on?	Cradley & Storrige NDP
Comment type	Comment
Your comments	<p>As leader of the NDP Group, I would like to inform the HCC Neighbourhood Planning Group of some information that has come to light regarding the interest Group that call themselves Heart of the Village. Individuals from this organisation have been the most vociferous in their criticism of the content of the NDP and the process adopted - see the lengthy responses received at Regulation 14 (Consultation Statement Appendix 6b). This is a schedule of monies invested in or given to the Heart of the village(Source annual accounts HoV) Loan Stock Interest in Heart of the Village John Turner (Father of S Herriot) on 09/04/2016 £4500 Tracey Iwanczuk On 09/04/2016 £4500 Alan Eldridge on 09/04/2016 £4500 Susie Vanmarle on 09/04/2016 £1000 Kevin Welford on 09/04/2016 £ 500 Total £ 15000 Cash Donations made to Heart of the Village 19/09/2015 Donation from Herriots £4500 06/02/2016 Plunkett bursary £2000 04/04/2016 Donation from Herriots £300 04/04/2016 Donation from Iwanczuku's £300 04/04/2016 Donation from Eldridges £200 Total 7300 £20300.00 It can be seen that all of these people, who have staged a campaign against the NDP from the start, have a clear vested interest in the success of the HoV scheme which is at odds with the community's desire to see the land they want built on preserved as free from development. This desire was clearly shown in the consultation carried out by the NDP group and endorsed by the Parish council (only</p>

dissenting voices were the ones quoted). The desire to keep this area free has further been reinforced by the reaction to a planning application presented by the HoV group which received a 60% objection rate which reflects almost exactly the outcome of the NDP questionnaire that the HoV group attacks. It is only fair and democratic that all of the information available is taken into account when the consultation is weighed up and not just the voices with vested interests at stake that shout louder and longer than the community at large.

Latham, James

From: Ian Bailey
Sent: 13 November 2016 19:36
To: Neighbourhood Planning Team
Subject: Cradley NDP

In the original consultation, I questioned the need to keep "The Gap", as I felt it kept the Village divided.

It is now in the NDP as an area of no development, but I feel this should be amended that buildings of a social nature should be allowed, but no commercial development.

Hope this will be considered. Ian Bailey

late response