

Progression to Examination Decision Document



Neighbourhood Planning (General) (Amendment) Regulations 2012

Name of neighbourhood area	Cradley Neighbourhood Area
Parish Council	Cradley with Storrige Parish Council
Draft Consultation period (Reg14)	10/03/16 to 13/04/16
Submission consultation period (Reg16)	28/09/16 to 09/11/16

Determination

Is the organisation making the area application the relevant body under section 61G (2) of the 1990 Act		Yes
Are all the relevant documentation included within the submission <ul style="list-style-type: none"> • Map showing the area • The Neighbourhood Plan • Consultation Statement • SEA/HRA • Basic Condition statement 	Reg15	Yes
Does the plan meet the definition of a NDP - 'a plan which sets out policies in relation to the development use of land in the whole or any part of a particular neighbourhood area specified in the plan'	Localism Act 38A (2)	Yes
Does the plan specify the period for which it is to have effect?	2004 Act 38B (1 and 2)	Yes
Are any 'excluded development' included? <ul style="list-style-type: none"> • County matter • Any operation relating to waste development • National infrastructure project 	1990 61K / Schedule 1	No

Does it relation to only one neighbourhood area?	2004 Act 38B (1and 2)	Yes
Have the parish council undertaken the correct procedures in relation to consultation under Reg14?		Yes
Is this a repeat proposal? <ul style="list-style-type: none"> Has an proposal been refused in the last 2 years or Has a referendum relating to a similar proposal had been held and No significant change in national or local strategic policies since the refusal or referendum. 	Schedule 4B para 5	No

Summary of comments received during submission consultation

Department	Comments
Development Management	<p>Policy CSNDP3 - Economic Development</p> <p>The policy refer to a 'Proposals Map', if this mean the 'NDP Plan Map for Cradley Village' then re-title plan to read ' NDP Proposals Map for Cradley Village'. Accurate cross-referencing is critical.</p> <p>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'. 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.</p> <p>Policy CSNDP7- Area of Flood Risk</p> <p>Have Environment Agency <u>AND</u> Land Drainage been consulted?</p> <p>Policy CSNDP 8 – Strategic Gap T</p> <p>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 <u>and that unlike the AONB its designation does not arise from landscape beauty.</u></p> <p>Community facilities within settlement boundaries are rare as such sites would normally command a residential value. So they are pushed outside onto fringe sites.</p> <p>CSNDP9 - Design</p> <p>Should the Village Design statement be attached as an Annex to the NDP if referred to?</p> <p>Major issue with sentence: 'Proposals for high density housing, such as that in outline for Pixiefields, will not be supported'.</p> <p>a) This criticises a specific permission and as such is inappropriate</p>

	<p>b) Pre-judging a reserved matters submission c) It was in fact not that dense and respected immediate surroundings.</p> <p>A sentence re: density is appropriate but must be flexible. Eastern Cradley 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.</p> <p>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'</p> <p>Policy CSNDP 10 - Conservation Area</p> <p>Whilst separate legislation deals with listed buildings a policy is still wise re: how applications for listed building consent will be judged.</p> <p>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.</p> <p>Policy CSNDP2</p> <p>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 it wouldn't be allowed under the NDP.</p>
Strategic Planning	The Strategic Planning team state that the Cradley Neighbourhood plan is in conformity with the Core Strategy, please refer to appendix 1.
Environmental Health	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. Given that no specific sites have been identified in the plan I am unable to provide comment with regard to potential contamination. EH provided general comments stating contamination is a material planning consideration and recommends the NDP to adhere to pertinent parts of the NPPF that refer to contaminated land.

External Consultees

Homes and Communities Agency	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.
Malvern Hills AONB	It is clear that from the consultation responses and the objectives contained in the NDP that the people of Cradley and Storrige value the landscape and environment of the parish very highly. In our comments on the Regulation 14 draft Cradley NDP (dated 27 th 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

	<p>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?</p> <p>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.</p> <p>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.</p> <p>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).</p> <p>Policy 10 Conservation Area It is unclear what this policy adds to the protection already in place for Conservation Areas.</p>
Coal Authority	No substantive comments.
Historic England	<p>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.</p> <p>Historic England are pleased that 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.</p>
Welsh Water	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.
National Grid	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. <i>Gas Distribution – Low / Medium Pressure</i> . Whilst there are 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.
Natural England	Natural England has no further comment to make on this draft neighbourhood plan.
Environment Agency	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.
Alan Eldridge Resident	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.
Alan Eldridge Resident	<u>REGULATION 16 2nd RESPONSE from Alan Eldridge</u> At the Regulation 14 Stage, I sent in a lengthy response which was critical of NDP process and critical of the consultation process. 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. 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. Summarized points of this representation below. <ul style="list-style-type: none"> • 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. I have read the response by the NDP group and they have failed to answer most of the points.

	<ul style="list-style-type: none"> • 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. <p>MY CONCLUSIONS AT REG.16 IS NO DIFFERENT TO MY CONCLUSIONS AT REG.14, AS FOLLOWS:-</p> <ul style="list-style-type: none"> • 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. <p>Clear guidance from Herefordshire Council in their NDP notes has been ignored to the detriment of this community.</p>
<p>John Turner Resident</p>	<p>Object to the policy in CSNDP 8 strategic gap. Community development should not be excluded from the so called strategic gap. Referred to Herefordshire Planning Department Delegated report on P162155/0 Church Stile Farm planning application. On page 37 - a summary. "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.</p> <p>The site is not within an area of Outstanding Natural Beauty and is not recognised as being of importance from a landscape perspective, 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. 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.</p> <p>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.</p>
<p>James Ashton Resident</p>	<p>Register a formal complaint / representation regarding policy 8 – Concerns over the Strategic Green Gap in the Cradley and Storrige Neighbourhood Development Plan.</p> <p>The process to implement this policy is clearly flawed and biased for the</p>

	<p>following reasons: The village was consulted via questionnaire, this made reference to the "Strategic Gap", however there was no definition as to what these gaps were, or map to identify it.</p> <p>The parish council used manipulative language throughout the questionnaire. The questionnaire used the word "development, without defining what this would include – housing, community facilities, and 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.</p> <p>No effort was made to communicate the Heart of the Village project, 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. The Parish Council used their own questionnaire instead.</p> <p>The Parish Council saw fit to accept the recommendations of Herefordshire 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.</p> <p>Concerns over the behavior of the Parish Council have not consulted the community properly 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". Believes that 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.</p>
Holly Welford	<p>The Strategic Green Gap, 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.</p> <p>The 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 only from a certain group of people within the village imputed on this.</p> <p>Considers 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.</p> <p>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.</p>
Anonymous Resident	<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 parishioners.</p> <p>Too focused on the 'strategic green gap', lack of regard to travel and business requirements are sufficient to demonstrate it is cannot be considered a 'development' strategy.</p> <p>As a member of Storridge community I feel we are particularly overlooked (even</p>

	<p>in naming). The addition of 'possibly Storrige' with regards to a settlement boundary is a potential noose around our dispersed, but strong, community.</p> <p>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 effects of A4103 (and main roads to Malvern). Raised issues the lack of open engagement and good manners were enough for me to withdraw from the committee</p>
<p>John Gilbert Resident</p>	<p>Objects with the idea of the strategic green gap. What is the NDP strategy, this has never been outlined.</p> <p>It seems strange to separate the two parts of the village.</p> <p>Policy 8 Strategic Green Gap and why it has separated two parts of the village to east and west.</p> <p>Argues point to bring the two parts together rather than a permanent divide for as all village that has just happened to grow up in two parts, gap is not necessary.</p> <p>Applauds efforts to heart of the village group.</p>
<p>Ros Pickering Resident</p>	<p>Raised concerns about the Cradley and Storrige NDP concerning the CSNDP Policy 8: Strategic Green Gap.</p> <p>The Parish Council questionnaire was misleading and our views may have been misrepresented by the ambiguity of the questions regarding development in the SGG.</p> <p>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.</p> <p>There is no provision in the NDP for siting of additional community shop facilities although this appears to be strongly supported by the community.</p>
<p>David Robertson</p>	<p>Object to Cradley NDP as it is unreliable and would damage the character of the village. In particular:</p> <p>It is based on a flawed consultation during which parishioners were invited to answer loaded, incomplete and inconsistent questions;</p> <p>Its convenor and other councillors were prejudiced, failed to acknowledge conflicts of interest and exploited the process to oppose a major community initiative;</p> <p>Its main goals seem to be preventing homes being built and enforcing a rigid separation between the component parts of a single beautiful village.</p> <p>Rejection and lack of consideration of Heart of the Village scheme by 2 people, unhappy by the steering group with approach to the NDP and consultation. Concerned the chair just wanted to preserve the village as it is, and protect the stream nearby the chairs house.</p> <p>Objects to chairperson whilst not declaring hostility/ objection toward heart of the village. Believe there campaign was ill informed.</p> <p><u>November 2014</u> Cradley Parish Council asked Carly Tinkler CMLI to conduct a landscape appraisal of parts of the village close to the settlement boundaries. Not briefed by the NDP group or the parish council but at a private un-minuted</p>

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.

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.

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').

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.

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.

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.

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.

Spring 2016, the Heart team sent Herefordshire Council a planning application. The prompted two unprecedented developments. First, Mr 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.

Claimed Flood risk had been inadequately addressed and HoV's analysis was contrary to national policy requirements. **This was untrue.**

The site suffered from the 'probable occurrence of sewage contamination' and was not suitable for a children's recreation area. **This was untrue.**

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.**

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. This can't be proved, but it was unwise for a senior councillor to involve himself, even peripherally, with such contentious material.

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.

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**

	<p>Morgan's Field from the 'gap';</p> <p>- 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 <i>any</i> scale, meaning that those who wish to live in the village - not least its young people - are unlikely to be able to find homes;</p> <p>- 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.</p> <p>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'.</p> <p>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.</p>
Sue Bee Resident	<p>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 possibility of this usage as suggested by Herefordshire planning recommendation at Regulation 14 was excluded from the amended NDP now under consideration without explanation.</p>
Tanya Lloyd Jones Resident	<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). It can be seen that all of HOV 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 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.</p>
Miles Meager Resident	<p>I'd like to provide comment on the Cradley neighbourhood development plan. There are two concerns I'd like to raise.</p> <p>No mention of the dangerous stretch of road and the completely inappropriate</p>

	<p>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. It is extremely dangerous.</p> <p>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. The questionnaire question did not give residents an opportunity to express what they would like in considering strategic development in this area.</p>
<p>Giselle Edgar Resident</p>	<p>I would like to express appreciation for the amount of work which is done in Cradley and Storrige 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.</p> <p>I would just like to submit a comment about the CSNDP Policy 8; Strategic Green Gap. 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.</p> <p>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.</p>
<p>Tracey Iwanczuk Resident</p>	<p>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.</p> <p>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.</p> <p>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!</p> <p>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.</p> <p>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.</p> <p>Cradley Parish Council only agreed to produce an NDP to enable them to stop</p>

	<p>development and to obtain more CIL funds should any development happen - the chair of CPC told me this himself.</p> <p>The whole process has been cynical and dishonest. 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.</p> <p>The Parish Council has done nothing to help Heart of the Village 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.</p> <p>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.</p> <p>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.</p> <p>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</p>
<p>Roman Iwanczuk Resident</p>	<p>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.</p> <p>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.</p> <p>My specific concerns about the NDP's policies follow.</p> <p>CSNDP1 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.</p> <p>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</p>

addressed.

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. 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. 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 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

	<p>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.</p> <p>CSNDP7</p> <p>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.</p> <p>CSNDP8</p> <p>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.</p> <p>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.</p> <p>Until this matter is settled the NDP should not be accepted. More recent feedback from Herefordshire Council at the Regulation 14 stage stated that 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.</p> <p>CSNDP9</p> <p>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</p>
<p>Bruce Herriot Resident</p>	<p>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.</p> <p>My own involvement was peripheral until August 2015, but my experience, I believe, shows what lengths the PC will go 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.</p> <p>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</p>

	<p>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.</p>
<p>S Herriot Resident</p>	<p>4 emails highlighting complaint. Refer to appendix 2.</p> <p>Raised concern for procedural irregularities throughout the NDP process-summary below</p> <ul style="list-style-type: none"> • 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 base 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. <p>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).</p> <p>There are two complaints to the Hereford Monitoring Officer about issues relating to the behaviour 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.</p> <p>Documentation that demonstrates all these other irregularities will be produced later in this submission.</p> <p>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 of 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</p>
<p>Ian Bailey Resident</p>	<p>In the original consultation, I questioned the need to keep "The Gap", as I felt It kept the Village divided.</p> <p>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.</p>

Officer's Appraisal

This plan has met the requirements of the regulations as set out in the table above. All the requirements of regulation 14 were undertaken by the parish council and all the required documentation was submitted under regulation 15. A total of 48 options were considered during the production of the plan and included within the Environmental Report.

No concerns have been raised from neither internal nor external responses with regards to the ability of the plan to meet the required minimum proportional growth contributing towards the deliverability of the Core Strategy. Therefore the plan is considered to meet the general conformity requirements of the Core Strategy. This has been confirmed by the Strategic Planning team.

There are no site allocations within the plan but the plan places a great reliance on windfalls and capacity within the settlement boundaries of East and West Cradley. There have been several large schemes approved in the past year, Pixie field being the largest to accommodate 60 dwellings. Commitments include up to 93 commitments within the plan period, this has contributed to meeting close to the proportional growth minimum of 103.

Overall, 3 responses have been received from internal service providers and 8 external consultees. HC Strategic Planning raised no objections towards the plan and Development Management comments have not objected but provided advice to enhance the NDP.

External responses from technical bodies such as Historic England, Natural England, Welsh Water, Malvern Hills AONB, Severn Trent, National Grid and Environment Agency have raised no objection to the regulation 16 draft plan. However provide comments to enhance the policies drafted within the NDP.

There have been 17 comments received from residents, 15 objections from local residents and two general comments. Majority of the objections are raised around the concerns of

- Strategic Green Gap
- Questionnaire wording/ how consultation was carried out
- Conduct of parish council/ steering group
- Heart of the Village project inclusion
- Procedural irregularities

These are issues which can be dealt with during the independent examination process.

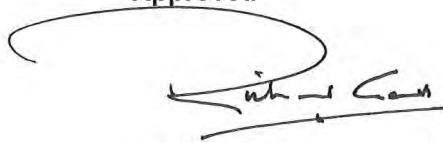
It should be noted that the material weight attributed to the Cradley NDP prior to the conclusion of the examination will need to take account of the level of outstanding objections in line with para 216 NPPF.

Programme Director's comments

Decision under Regulation 17 of the Neighbourhood Planning (General) Regulations 2012.

The decision to progress to appoint an examiner for the above neighbourhood plan has been

Approved

A handwritten signature in black ink, appearing to read 'Richard Gabb', is written over a horizontal line. A large, sweeping circular flourish extends from the left side of the signature.

Richard Gabb

Programme Director – Growth

Date: 9th January 2017.

Appendix 1

Neighbourhood Development Plan (NDP) – Core Strategy Conformity Assessment From Herefordshire Council Strategic Planning Team Name of NDP: Cradley & Storrige- Regulation 16 submission version

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 Space	OS3	Y	

Other comments/conformity issues:

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

Appendix 2

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 led 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 base 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

THE FULL REPRESENTATION WITH APPENDICES CAN BE FOUND IN REG 16 COMMENTS