

EARDISLAND PARISH COUNCIL

Neighbourhood Development Plan

Comments on Options Consultation Events 14-15 November 2014

Comments made on response forms and protected views response forms – see tables.

Comments from Comments sheets. Each bullet point from separate sheet:

- The data taken from the CLP should now be considered to be out of date. If questions were asked again the answers would be very different
- Why no photos from west end (Burton Court end) of village (gateway)?
- An excellent presentation and evidence of much effort. Thanks for the refreshments also!
- Page 17 of current draft on website – Wildlife-rich features – allowance should be made to remove features if necessary and replace with new habitat etc
Policies – general concern that policies do not allow for individual circumstance. Particular needs of existing villagers
Policy E10 IV – difficult to understand – also not clear that this is laid out by Conservation Area dictate
Appendix 2 – shop and cafes omitted
Green areas – no map, we would like to see one
- Many of the questions are loaded to get certain answers, not necessarily what villagers might want

Caroline Marsden's notes of one visitor's comments:

- Section 4.2 – Phrasing of 'state of affairs'
- Section 4.4 – regular flooding – would question word 'regular' – it's occasional
- Call for Sites should happen
- Affordable housing – need larger developments in order to provide affordable housing on the back of market housing
- Pembridge boundary – could they ask to build adjacent, but in Eardisland parish? (No, not adjoining – CM)

Verbal response to Clerk:

- I am certainly not completing the response form. This process is disgraceful and I'm going to get it the draft and the consultation nullified. Local landowners have to be consulted and we haven't been. Why haven't you called for sites? Who do I speak to at Herefordshire Council? (Sam Banks email address given)

Comments made by Person A to Samantha Banks in email copied to Clerk:

- The "Why you should read this and what it means for you" document under the heading "Why do we need your help" uses the phrase in the first bullet point "keeping the settlement boundary" - this is biased and should read establishing the settlement boundary, or something equally impartial. The attached map is virtually illegible and does not include land at the western end of the village which recently received planning approval as it states it should in the Steering Group meeting notes of 11th September "retain SB and expand it to include what is already permitted/built"

- The third bullet point is also biased by the use of the word "should" in relation to protecting views and vistas. An impartial wording such as - The views and vistas that could be protected from development.
- The "Community Consultation Form" is hopelessly biased and therefore not fit for purpose. None of the questions were independently vetted as was the case for the questions in the questionnaire used for the Community Led Plan. (A document that I think has no legal standing, whereas the Neighbourhood Development Plan will have legal status.)
- The preamble to question 1 contains the wording "All Settlement Boundaries are removed in the Core Strategy. Therefore, the Eardisland NDP Steering Group recommend that a Settlement Boundary for Eardisland should be retained - as shown on the map overleaf." The use of the word "therefore" implies a logic that does not exist and is a leading question. The same incorrect and difficult to read map is referred to. The following question is even more leading containing, as it does, the words "agree" and "preferred". In the answers for consideration, the options are restricted to yes and no, when there should, in the interests of impartiality, "another" and/or don't know.
- Question 2 is badly worded in that it is not clear whether the number of houses options could refer to the total number of houses between now and 2031 or the number of houses per development. Again options are restricted. There is no option for zero houses, or for more than 10. Anyone adding their own preferred option could be considered as spoiling their form.
- Question 3 asks for a view on publicly accessible views that are not available until attending the open event. There is no option of "Don't know".
- Question 4 again asks for agreement and there is no "Don't know" option.
- Question 5 is illogical. Addresses are not required to assess response rates.
- I have other concerns. Two Parish Councillors have said that the Steering Group were keen to have the status of Eardisland re-classified to prevent any development. (This despite 87% of respondents to the Community Led Plan questionnaire being in favour of more housing in the village and the Steering Group's assertion that their work is on behalf of the those living in the parish and the Parish Council.) Even a cursory glance through the draft plan suggests that zero new homes remains the aim of the Steering Group.
- The draft plan contains (Para 4.4) the statement "Regular flooding brings effective communication to a standstill." This is emotive and patent nonsense.
- The draft plan also states that all new development will be required to make provision for high speed broadband and other communication networks. Nothing high speed is available in Eardisland.
- Numerous businesses and landowners (including myself) have not been contacted by the steering group as I believe they are required to do.

Comments sent via email to Clerk:

Person B

We would like to communicate our strong concerns and misgivings regarding the ENDP draft plan and process used to prepare the plan. In brief our primary concerns relate to:

- The Steering Committee and the promotion/prioritisation of personal agendas within the Steering Committee, specifically regarding the deliberate prevention of development
- The lack of a positive, proactive, collaborative or inclusive attitude to the plan making process, sustainable development and proportional growth
- The generally negative tone, and often incorrect content, of the plan overall
- Lack of consideration and inclusion of current evidence basis, data, factual information, professional consultation and other necessary research to support or justify policy
- The policies within the plan draft, which are designed to unnecessarily prevent and restrict the facilitation of sustainable development or proportional growth
- The nature and format of the recent household 'questionnaire', which contained leading statements produced without evidence, represented the personal views of the SC,

contained a restricted/incomplete list of options, was factually incorrect and could not be considered a fair, informative, balanced or open attempt to ascertain community opinion

- The lack of community engagement/stake holder engagement throughout the process
- Lack of transparency, collaboration, and inclusion, – demonstrating a general but fundamental misunderstanding about the role of NDP's
- A general lack of conformity to both the specifics and overarching essence of the NPPF
- Lack of conformity with the emerging Core Strategy
- Selective use of some CLP data and complete disregard for other aspect of the CLP data
- Continuous over stating of flooding and inflammatory/misleading/incorrect use of flooding related statements and the impact of flooding within the plan.

Person C

- Retain the settlement boundary? I fear that this is an ill-conceived question, in that the boundary is very tightly drawn and would allow very little development. Maintaining the boundary is therefore tantamount to rejecting the possibility of almost any development. That may be what a majority of the village would like but will not, I suspect, be acceptable either to HCC or an independent examiner
- Size of developments? An unanswerable question in that a sensible judgement would depend on the location and design of a proposed development. I can think of perfectly possible sites where more than one or two houses would be absurd and ones where 20 would be quite acceptable
- Sustainability Assessments? Wholly agreed
- I would guess that the majority of responses will say 'yes' to Q1, '1 - 3' to Q2, and tick all or the vast majority of Q3. If I am right, it will make progressing the NDP very difficult, except to say to HCC that Eardisland rejects the relevant parts of the core strategy and asks HCC effectively to isolate us from it. I suspect I know what the answer would be. And I fear that we shall lose the opportunity of trying to guide development into particular areas. Or is that question just simply too difficult?
- Protected views? Why these particular views? On what criteria have they been selected? And is it the view that needs to be protected? The public open space that is the recreation ground must obviously be protected, but is it the view that is the critical factor?
- I would dislike development that affects the view from our house, but is that sufficient to base public policy on? I would suggest not
- It would be intolerable for all the chosen views to be affected by development; most, however, would - on their own - tolerate sensitive development

Person D

We have grave doubts about many of the questions and the way they were worded.

- Is it possible please, to have confirmation of the members of the committee where they live and whether they have any personal feelings about proposed 'special publically accessible views that should be protected'
- It could appear that some members want to keep Eardisland locked in a time warp with no new building in the foreseeable future.
- The photographs showing 'protected views' many were not in the existing Village Boundary plan so should not have been shown requesting the public to answer yes or no to protect. If so much of the Neighbourhood Settlement Plan has 'flooding zones' then the plan must be extended out into the Parish to allow many more houses both large and small to be built. There are some areas already in the existing plan which do not flood but could now be blocked by neighbours with adjoining properties wanting to protect their own views with no regard for future houses to benefit our village.
- We can appreciate the time and discussions that have gone on to produce this draft plan for approval but feel much of it has been rushed and fear that it leaves many unanswered questions and raises more problems for future development for Eardisland.

- The 3 new developments, St Marys Walk, and 2 of Border Oak houses, built during our time of living in Eardisland, have enhanced the village and allowed both young, working people and retired to move to live here, but with this draft plan, none of those would have been allowed.

Person E

- As a landowner in the parish of Eardisland and working in the village (for over 18 years), I am interested to see how the Plan is progressing, not least because I am a member of the Steering Group for my village and we have been looking at some of the other villages to see how they have done things.
- However, I have been alarmed to see that the Eardisland draft plan has already been drawn up BEFORE the open days and results of the questionnaire have come in? How can a plan that was prepared before possibly be representative of the village as a whole? It seems to me that the plan is just the wishes of those on the Steering Committee this surely can't be right and I wish to object.
- Although I no longer live in the village, my mother & family lived here during the second world war and my parents met on Eardisland bridge, my father being born in Shirlheath. My parents moved back in 1986 and said the flooding was no worse then than during the war, in spite of the new developments of houses that have been built since, so I do not feel that a few more on carefully chosen sites could do anything but enhance the village.
- It appears that the Steering Group are against any new building at all, preferring to 'protect views' within the village settlement area and stop any building on land outside by trying to say all new building should be within the boundary, this makes a nonsense of the Core Strategy's plan of villages having a 15% increase in housing between now and 2031.
- As I own land in the parish, I was surprised that I and some of other landowners did not get a letter from the steering group. In my village we wrote to every landowner in the parish offering them the chance to put forward their land for possible development, we only had 2 replies but at least they had a chance to respond.
- Eardisland is not alone with a flooding problem, we are also on a flood plain but even so we have been much more open and unbiased in not drawing up a plan until the results of our questionnaire and open days are in.
- The open days had more information and chances for people to give their comments but what about those unable to attend perhaps due to work or holiday commitments? Also such a serious subject needs time to be absorbed, I downloaded the draft plan but much of it is unreadable because of the word draft in large black letters across every page, was this deliberate?
- It is still my hope to move back and live in Eardisland but this proposed plan would block any chances.

Person F

In essence we feel we should share our serious concerns regarding the process being undertaken to produce the ENDP.

- We were under the impression that the ENDP would represent the views of the community as a majority, and where opinions could not be ascertained with genuine supporting evidence (such as the CLP data), that consultation and discussion would take place regarding all options before a proposal was advanced.
- It was a shock to see that many decisions seemed to have been concluded and promoted by the Steering Group, without any community consultation and indeed without a full investigation of all the various options and possible ramifications of each option.
- We believe all residents, experts and other stakeholders should have been part of the consultation process regarding the settlement boundary and alternative options, and also with regard to the 'protected views' that the Steering Committee have chosen.

- Sadly we feel quite uncomfortable with the tone, content, process and leading statements within the questionnaire - specifically with regard to the settlement boundary being retained.
- As far as we are aware development opportunities would be severely restricted within the SB by the flood egress issue - rendering development projects within, or indeed adjacent to the boundary virtually impossible. This means that retaining the existing settlement boundary - without verifying if there will be enough development opportunities - actually prevents development. This would be contrary to Herefordshire and National planning guidance.
- We can't support the proposal to retain the settlement boundary at this stage, because we do not feel that all the other options have been researched. The settlement boundary has historically prevented development opportunities because road flooding may prevent egress in an extreme/rare event, so why would the Steering Committee wish to severely limit development to an area they know will be at greatest risk? We do not wish to prevent well designed, sustainable and sensitive housing/development and understand that the CLP would suggest a huge majority in the village feel the same.
- Our instinctive preference at this stage would be for small scale housing schemes organically spread across the village (both within and beyond the settlement boundary) - but we don't feel that the Steering Committee have presented enough information or options for us to make conclusive decisions at this stage via a questionnaire that was unfortunately worded.
- Other elements of the questionnaire were also flawed - with incomplete option choices, leading statements, selective questions and a lack of explanation. There is also an unfortunate element of personal interest in the Questionnaire and at the open meeting - which I am sure the SG will address and resolve.
- It is very unfortunate there is unlimited access to 'spare' or 'extra' questionnaires in the shop and that some members of the steering committee are delivering and collecting extra forms. Some people/homes in the village did not receive a questionnaire at all and we understand that other vital landowners and stakeholders have not had questionnaires either. This lack of due process is open abuse and may allow a misrepresentation of certain factions and unduly shape the response/percentages. It actually renders the questionnaire data completely unreliable and open to challenge. It hardly represents a fair and transparent process when some people are getting several forms, whilst others get none, some are hand collected and others are not. It seems no one would know how many forms have been distributed and if people are completing more than one form. No credibility can be placed on the data coming forward and the results should be discounted and a new process chosen, after open consultation and with an evidence base to explain the options.
- In relation to the 'protected' views, we would like to state this process is also incomplete and unsupportable.
- Perhaps other views should also be considered worthy of protection, not just the areas that may protect the amenity of certain houses/residents, chosen behind closed doors? However we feel it is important not to overprotect views/land as a gut reaction against development. All villages (including Eardisland) have changed and grown organically over many generations and naturally land on the edge of settlement is likely to be incorporated into the built area at some point. We feel that this organic growth can continue without significant harm with the right NDP in place.
- It may be best to hold a more open consultation to determine which 'views' people wish to protect. New building projects might actually enhance, improve and make a positive contribution to the village and the setting, as has occurred in other villages such as Pembridge and Weobley. New housing, and enterprise should not be considered a negative change, and policy criteria can be produced to ensure only the very best projects succeed.

- With regard to the sustainability statement we feel this idea has merit and might be an opportunity to promote excellence. We would like the SG to also consider some better design criteria for the plan, (we don't feel the photographs chosen or the policies in the draft represent or promote the inherent village design features well at all) to ensure only high quality design projects can be approved without delay.
- And briefly, with regard to the descriptive text in the draft plan, we would like to strongly object to the repetitive, inflammatory and incorrect references to flooding and the risk of flooding. It is a disservice to the village to create a blight that simply doesn't exist to the degree that the SG have fabricated.
- We have many other concerns, relating to the draft and the Steering Committee but felt we should make our initial feelings known regarding the questionnaire as the deadline is Friday.

Comments made to Cllr Sheffield by parishioners and a business owner:

- The tone from the SG seems very negative in regard to development
- They seem to want maintain the status quo
- The questions are leading and closed
- Who selected the views and why was there no consultation?
- If you keep the settlement boundary where do you build?