

# **Consultation Statement**

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## 1. INTRODUCTION

1.1 This Consultation Statement has been prepared to accompany the submission of the Abberley Neighbourhood Development Plan (NDP) to Malvern Hills District Council, the local planning authority, and to ensure that the relevant statutory requirements are met.<sup>1</sup> The Statement:

- Contains details of the persons and bodies who were consulted about the proposed Plan;
- Explains how they were consulted;
- Summarises the main issues and concerns raised by those consulted; and
- Describes how these issues and concerns have been considered and, where relevant, addressed in the proposed Plan.

### Format of the Consultation Statement

1.2 The Statement covers the following stages of Plan preparation, arranged in chronological order:

- The initial stages of work on the Plan, covering the designation of the Neighbourhood Area, the launch meeting and setting up the Steering Group and working groups (section 2).
- The residents' questionnaire survey (section 3).
- Drop-in event consultation (section 4).
- The draft Plan consultation under Regulation 14 (section 5).
- The issues and concerns raised in response to the Regulation 14 consultation, and how they were addressed (section 6).

1.3 The following principal consultation methods were used in preparing the NDP:

- Posting of material online via an NDP tab on the Abberley Parish Council website at <https://www.abberleyparish.org.uk/>
- Formation of a Steering Group comprising Parish Councillors and members of the public living in the parish, with minutes available on the Parish Council website.
- Monthly reports presented to the Parish Council whose agenda and minutes are available to the public.
- Posting of material on the parish noticeboards and other locations.
- Articles in the parish magazine.
- Publicity of events via email.
- Questionnaire survey of residents.
- Launch meeting and drop-in event.
- Consultation on the draft NDP held in accordance with Regulation 14 of the 2012 Regulations, taking into account Planning Practice Guidance on public consultation during the coronavirus (COVID-19) pandemic.

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<sup>1</sup> Neighbourhood Planning (General) Regulations 2012, Regulation 15 (2)

## 2. DESIGNATING THE NEIGHBOURHOOD AREA AND ESTABLISHING THE STEERING GROUP

2.1 The following steps and actions were undertaken by the Parish Council in terms of initiating work on the NDP:

- Application to Malvern Hills District Council for designation of the Abberley Neighbourhood Area was made on 9 June 2015. The District Council carried out a six-week consultation on the proposed Neighbourhood Area which closed on 28 August 2015. Comments were received in support and requesting that the emerging NDP take account of various strategic documents and designations. The application was approved by the District Council on 28 August 2015.
- Establishment of a Steering Group and working groups in April 2016, with membership drawn from the Parish Council and from the local community. Terms of reference can be seen at <https://www.abberleyparish.org.uk/terms-of-reference>.
- Holding a Launch Meeting on 19 June 2016, which was publicised by posters, an advert and article in the parish magazine, email distribution and personal contact with businesses. The meeting heard presentations from a member of the Chaddesley Corbett NDP group and from the Worcestershire Archive and Archaeology Service. This was followed by a question and answer session and presentation of the draft Vision statement. There were 65 attendees. Contact details were provided by 37 residents and a further 10 expressed a less formal interest with the working groups being then formed from this pool.
- The inaugural meeting of the combined working groups took place on 15 November 2016 with 11 attendees. For minutes of this and subsequent meetings see <https://www.abberleyparish.org.uk/working-group-meetings>.

2.2 The issues and concerns raised in this initial stage of the plan-making process comprised in summary:

- Organisational and administrative issues, including terms of reference, project plan, the need for specialist external support, and data sharing.
- The proper scope of the NDP in terms of land use and development.
- Thematic work areas identified around housing, infrastructure, economy, and landscape and environment.
- How best to seek the views of residents in the parish on these thematic work areas.
- What does sustainable mean for Abberley in terms of new housing (access to services and facilities, schools, and transport) and for local businesses (broadband).

2.3 These issues and concerns were considered and addressed by:

- Successful application for Neighbourhood Area designation.
- The establishment of the Steering Group/working group structure comprising elected parish councillors and other volunteers, and open to all in the community.
- Decision to proceed with a residents' questionnaire to establish information and views, particularly on the four thematic work areas.
- Seeking advice and support from Malvern Hills District Council.
- Considering engaging consultancy support to assist with later stages of the process.

### 3. RESIDENTS' SURVEY

- 3.1 The next stage of the plan-making process was the residents' survey. A questionnaire was drawn up taking into account the identified thematic work areas, information gathered up to that point, and group discussions.
- 3.2 The questionnaire asked 35 closed and open questions on the following topics: living in Abberley; local services; working from home; broadband; highways and transport; new development; and personal information.
- 3.3 The questionnaire was made available through SurveyMonkey in July 2017. Printed copies of the questionnaire could also be collected from and returned to the village shop. A drop-in session was held at the Village Hall on 23 August, between 7.30 and 9.00 pm, where residents could complete the survey with assistance from a member of the group. The survey was publicised on the website, by email and by posters in the village shop, the churches, the Manor Arms and Owen's Garage.
- 3.4 A total of 159 responses were received to the survey from residents aged 11 and over. This represents 22% of residents in this age group in the Neighbourhood Area (Census 2011).
- 3.5 The issues and concerns raised in responses to the survey provided a basis for work on the emerging 3NDP. The results were reported and discussed at meetings in November 2017 to February 2018, when it was also decided to seek consultancy support to continue progress on the NDP.<sup>2</sup> The outcomes of the survey were subsequently used to inform the contents of the NDP.



<sup>2</sup> A planning consultant was appointed in May 2018, and specialist work on design and housing needs also commissioned from AECOM via Locality.

#### **4. DROP-IN EVENT**

- 4.1 Discussions on the scope and format of the NDP in the latter half of 2018 and early 2019 were undertaken in the context of early stages of work on a review of the South Worcestershire Development Plan (SWDP). The SWDP is a joint Local Plan prepared by Malvern Hills District Council, Wychavon District Council and Worcester City Council, adopted in February 2016 with a plan period of 2006 to 2030. It provides the strategic context for the NDP. A review was commenced in late 2017 to roll the plan forward to 2041. An Issues and Options consultation was held in November-December 2018 and a Preferred Options consultation in November-December 2019.
- 4.2 Against this background, a drop-in event was held in June 2019 to seek views on how best to meet the housing requirements in the Neighbourhood Area up to 2041. This included consideration of housing sites and an associated development boundary at Abberley Common. Although the decision was subsequently taken to align the NDP with the adopted SWDP, with an end-date of 2030, the drop-in event provided an opportunity to publicise the NDP to the community and to seek wider views.
- 4.3 The drop-in event was held at Abberley Village Hall on 28 June 2019 between 7pm to 9pm. It was advertised on the Parish Council website and by posters displayed on notice boards, telegraph poles and windows and at the Manor Arms. The event was also publicised in the parish magazine, email and using a display banner. Exhibition boards were prepared to show the housing requirement and other background information; possible housing site allocations and a development boundary for Abberley Common; and an explanation of the process being followed.
- 4.4 The session was staffed by members of the Steering Group and the planning consultant. District Councillor Paul Cumming was also on hand to answer questions from the public. Those attending were welcomed and given a short comment form to enable them to provide feedback via both tick box questions and open comments. The events were attended by 43 residents; 30 completed comment forms were returned.
- 4.5 The feedback from the comment forms was analysed and reported to the Working Group meeting on 24 July 2019. The principal issues and concerns raised in the consultation may be summarised as follows:
- The housing site allocations up to 2041 were supported by two-thirds of respondents, with 83% also supporting the associated development boundary;
  - There were many comments about the impact of development on traffic and infrastructure;
  - There were also comments about amenities, including play areas and public transport.
- 4.6 Following the drop-in event, the SWDP Review Preferred Options consultation included a site at Abberley Common to which the Parish Council wished to object. In light of this, it was decided in November 2019 to align the NDP with the adopted SWDP, i.e. with an end-date of 2030, and the draft Plan was prepared on that basis.

## 5. CONSULTATION ON THE DRAFT PLAN

### Consultation on screening opinion

5.1 In February 2020, the Parish Council asked Malvern Hills District Council for a screening opinion on whether or not the draft NDP required a Strategic Environmental Assessment (SEA) or Habitats Regulations Assessment (HRA). Natural England, Historic England and the Environment Agency were consulted on the draft screening opinion report between 5 March to 9 April 2020. All three bodies concurred with the draft screening opinion that neither a full SEA or HRA would be required.

### The Regulation 14 consultation

5.2 The draft NDP was approved for the purposes of public consultation at the Parish Council meeting on 20 May 2020. The approved draft took account of comments which had been made on an earlier version by Malvern Hills District Council officers.

5.3 Consultation on the draft NDP was carried out in accordance with the requirements of Regulation 14 of the Neighbourhood Planning (General) Regulations 2012 as amended, also taking account of the latest Planning Practice Guidance<sup>3</sup> that had been issued in response to the coronavirus (COVID-19) pandemic. The views of Malvern Hills District Council were sought on the proposed consultation methods, having regard to the prevailing advice. Care was taken to ensure that those without internet access were engaged. The consultation ran for eight weeks from 29 June 2020 to 24 August 2020. This gave longer than the minimum six weeks required by the regulations, to allow for the restrictions associated with the pandemic and the holiday period.

5.4 At the start of the consultation period a flyer was hand-delivered to households and businesses throughout the Neighbourhood Area by volunteers. This explained how and where the draft NDP could be viewed and invited comments. Posters were placed in the parish noticeboards, telegraph poles and windows and at the Manor Arms; and banners were displayed in prominent locations around the Neighbourhood Area.



*Display banner advertising the consultation*

<sup>3</sup> Paragraph: 107 Reference ID: 41-107-20200925

- 5.5 The consultation was further publicised by email and in the parish magazine for June and July, and a press release was issued to local newspapers circulating in the parish.
- 5.6 Printed copies of the draft NDP were available for collection free of charge at the Abberley Village Stores. Printed copies were also available on request from the Parish Clerk.
- 5.7 The draft NDP included a pre-submission consultation and publicity notice, setting out the requisite details of the consultation. The draft NDP, a comments form and supporting documents were all posted on the Parish Council website. Copies of the pre-submission consultation and publicity notice, flyer and poster are at Appendix 1.
- 5.8 A comments form was prepared to assist the making of responses. This could be downloaded and printed from the website. Printed copies were available from the Village Stores and the Clerk. Comments could be made by hand to the collection box at the Village Stores, or by email or post to the Clerk. Comments could also be made by completing the comments form electronically on the Parish Council website. Two Parish Councillors were available by telephone to answer any queries throughout the consultation period.
- 5.9 A comprehensive list of the consultation bodies specified in Schedule 1 of the 2012 Regulations was provided by Malvern Hills District Council, which was added to in respect of local bodies and organisations by the planning consultant and by the Working Group. The final list of consultees is at Table 1. Consultation was by email or letter, sent by the Parish Clerk at the start of the consultation period and explaining where the Plan could be viewed and how and by when to make comments.



*Collection box for comment forms, Abberley Village Stores*

**Table 1: consultees on the draft NDP**

<b>Local planning authorities, County Council and adjoining parish councils</b>
Malvern Hills District Council
Worcester City Council
Wychavon District Council
Wyre Forest District Council
Worcestershire County Council
District and County Councillors
Neighbouring Parish Councils: Pensax, Rock, Astley and Dunley, Great Witley, Shelsey Kings (The Shelseys), Stockton on Teme
Worcestershire County Association of Local Councils
<b>Other consultation bodies</b>
Coal Authority
Homes and Communities Agency
Natural England
Environment Agency
English Heritage
Historic England
Network Rail
Highways England
Marine Management Organisation
Electronic communications: British Telecom, CTIL for Vodafone and Telefonica, Virgin, Superfast Worcestershire, Talk Talk, Three.
NHS England, NHS South Worcestershire Clinical Commissioning Group, NHS Planning and Partnership Worcestershire Acute Hospitals NHS Trust, Worcestershire Health & Care NHS Trust
National Grid, Western Power Distribution, EON UK, Npower, Wales and West Utilities, Scottish Power, EDF Energy
Severn Trent Water
Worcestershire Council for Voluntary Youth Services
Worcestershire Federation of Women Institutes
Worcester Diocese
Abberley Parochial Church Council
Churches Together in Worcestershire
Worcestershire Local Enterprise Partnership
Federation of Small Businesses (Herefordshire and Worcestershire)
Herefordshire & Worcestershire Chamber of Commerce
Home Builders Federation
<b>Other consultees</b>
Malvern Hills AONB
The Crown Estate
Campaign for the Protection of Rural England, Worcestershire Branch
Forestry Commission England
Herefordshire & Worcestershire Earth Heritage Trust
Canal and River Trust
Age UK Herefordshire & Worcestershire
Ancient Monuments Society
Sport England
Worcestershire Wildlife Trust
Landowners of the proposed Local Green Spaces and of the three sites allocated in the SWDP for residential development
Local businesses and facilities: Abberley Village Hall, Abberley Parochial VC Primary School, St. Michael's Church, St. Mary's Church, The Manor Arms, Abberley Hall School, The Elms Hotel and Spa, Abberley Village Stores and Post Office.

## **6. RESPONSES TO THE CONSULTATION**

### **Issues and concerns raised**

6.1 Responses were received from Malvern Hills District Council, Worcestershire County Council and 13 other consultation bodies and organisations. Comments were received from/on behalf of 24 residents. All the comments are shown in the Response Log at Appendix 2, where a response is provided to each comment and any necessary amendments to the draft NDP are set out.

6.2 The principal issues and concerns which were raised in the consultation may be summarised as follows:

- Malvern Hills District Council raised concerns with the inclusion of draft policies ABY4 and ABY5, both of which sought to set planning policy criteria for sites which already had the benefit of planning permission.
- Malvern Hills District Council also suggested alternative or additional wording for some of the other draft policies, to add clarity or ensure conformity with strategic policies.
- Herefordshire and Worcestershire Earth Heritage Trust highlighted an additional Local Geological Site, Abberley Parish Quarry, which was in the process of being designated.
- Severn Trent made a number of comments including on water efficiency and surface water drainage.
- Service provider teams at Worcestershire County Council addressed issues of the historic environment, public health and wellbeing, rights of way, sustainability and transport planning.
- Additional references to aspects of building sustainability were requested including solar panels, rainwater harvesting and permeable surfaces.
- Objection to the inclusion of the Glebe land as Local Green Space.
- Clarification that the Local Green Space designation of Abberley Village Quarry should refer to Abberley Parish Quarry.

### **Considering and addressing issues and concerns**

6.3 All comments were passed to the planning consultant for review and to provide a recommended response, including amendments to the draft NDP. Table 2 provides a summary of the principal amendments to the draft NDP in plan order. Full details may be found at Appendix 2.

**Table 2: Schedule summarising principal changes made to the draft NDP following consultation**

**Abbreviations**

MHDC: Malvern Hills District Council

SPD: Supplementary Planning Document

WCC: Worcestershire County Council

<b>Consultee</b>	<b>Change made</b>
MHDC	Chapter 1: include flow-chart to explain the NDP process.
Herefordshire and Worcestershire Earth Heritage Trust	Objectives: include reference to Local Geological Sites.
MHDC	Updates to paras. 5.4 and 5.5 re the indicative housing requirement.
MHDC	Policies ABY4 and ABY5: delete.
MHDC	Policy ABY6: add plan to show location of community facilities, clarify policy re proposals affecting an existing community facility, and add wording to cover new or the enhancement of existing facilities.
MHDC	Policy ABY7: add plan to show landscape types.
Herefordshire and Worcestershire Earth Heritage Trust	Policy ABY9: include additional Local Geological Site.
Herefordshire and Worcestershire Earth Heritage Trust	Policy ABY10: Abberley Parish Quarry to be designated as Local Green Space, not Abberley Village Quarry.
Public comment	Policy ABY10: delete LGS3 Glebe land.
Severn Trent, WCC Historic Environment, Public Health, and Sustainability teams, WCC Transport Planning Unit, public comment	Policy ABY11 and supporting text: add references to water efficiency, traditional farmsteads, healthy lifestyles, Planning for Health in South Worcestershire SPD, active travel, renewable energy generation, street lighting, electric vehicle charging points, water butts, adaptation or mitigation to climate change, composting, Streetscape Design Guide, sustainable drainage.
MHDC	Policy ABY14: clarify policy wording.
Public comments	Community Actions: amendments and additions re milestones, hedgerow trimming, and recording old oak trees.

## **APPENDIX 1**

### **Regulation 14 consultation material**

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Pre-submission consultation and publicity notice

Flyer

Poster

# Abberley Neighbourhood Development Plan

## Pre-submission consultation and publicity notice

A public consultation on the draft Abberley Neighbourhood Development Plan held in accordance with Regulation 14 of the Neighbourhood Planning (General) Regulations 2012 will start at 9.00 a.m. on Monday, 29 June 2020 and end at 5.00 p.m. on Monday 24 August 2020.

### Where you can inspect the draft Neighbourhood Development Plan

The draft Neighbourhood Development Plan may be inspected on the Parish Council website at <https://www.abberleyparish.org.uk/>.

Printed copies of the Neighbourhood Development Plan can be collected from the Abberley Village Stores or obtained on request from the Parish Clerk at [clerk@abberleyparish.org.uk](mailto:clerk@abberleyparish.org.uk) or telephone 07903 377066.

Supporting documents are available on the Parish Council website.

### How to make comments on the draft Neighbourhood Development Plan

Comments must be made in writing and include the name and address of the person making the comments. Please make comments as specific as possible, quoting the relevant policy or paragraph number(s). All comments will be publicly available.

A comments form is available and can be either downloaded and printed from or completed electronically on the Parish Council website, collected from Abberley Village Stores or requested from the Parish Clerk.

Send us your comments:

- by completing the comments form electronically on the Parish Council website at <https://www.abberleyparish.org.uk/>
- by email to the Parish Clerk at [clerk@abberleyparish.org.uk](mailto:clerk@abberleyparish.org.uk)
- by post to the Parish Clerk c/o 1a Church Walk, Stourport on Severn, Worcestershire DY13 0AL
- by hand to the comments collection box at Abberley Village Stores.

If you have any questions, please telephone either Cathie Eberlin on 07739 455827 or Ning Kedwards on 07732 702380.

**All comments must be received by 5.00 p.m. on Monday 24 August 2020.** These will be considered by Abberley Parish Council and will help shape the final Neighbourhood Development Plan.



## Abberley Neighbourhood Development Plan

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Dear Parishioner,

As you know, we are in the process of preparing a Neighbourhood Development Plan, to guide how the Parish will develop up to 2030. We have now reached the stage where we have a draft Plan – and we want to know what you think.

You can see the draft Plan on-line, at <https://www.abberleyparish.org.uk/>. If you'd prefer to read a printed version, you can collect a copy from Abberley Village, or ask the Parish Clerk to post one to you - email [clerk@abberleyparish.org.uk](mailto:clerk@abberleyparish.org.uk) or telephone 07903 377066.

We've prepared a form for you to use for your comments which can be downloaded and printed from the Parish Council website, collected from Abberley Village Stores or requested from the Clerk.

Please send us your comments in writing, including your name and address:

- by email to the Parish Clerk at [clerk@abberleyparish.org.uk](mailto:clerk@abberleyparish.org.uk)
- by post to the Parish Clerk c/o 1a Church Walk, Stourport on Severn, Worcestershire DY13 0AL
- by hand to the collection box at Abberley Village Stores.

If you've any questions, please telephone either Cathie Eberlin on 07739 455827 or Ning Kedwards on 07732 702380.

**All comments must be received by 5.00 p.m. on Monday 24 August 2020** for them to be taken into account.

Thank you for your help,

Catherine Knight, Chairman, Abberley Parish Council



# Abberley Neighbourhood Development Plan

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The draft Neighbourhood Development Plan has now been published – and we want your views.

**You can read the Plan and find out how to respond:**

- At <https://www.abberleyparish.org.uk/>, or
- Collect a copy from Abberley Village Stores, or
- Request a copy from the Clerk - email [clerk@abberleyparish.org.uk](mailto:clerk@abberleyparish.org.uk) or telephone 07903 377066.

**Let us have your comments by 5.00 p.m. on  
Monday 24 August 2020**

We look forward to hearing from you  
Abberley Parish Council

## **Appendix 2**

### **Regulation 14 consultation Response Log**

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Part 1: Comments from consultation bodies

Part 2: Community comments

#### **Abbreviations**

NPPF: National Planning Policy Framework

SWDP: South Worcestershire Development Plan

MHDC: Malvern Hills District Council

NDP: Neighbourhood Development Plan

WCC: Worcestershire County Council

## Part 1: Comments from consultation bodies

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Parish Council's response	Amendments to Abberley draft NDP
Malvern Hills District Council	NDP	C	<p>[NB contextual information provided in the MHDC response on the NPPF, Planning Practice Guidance and the SWDP has been excluded from the following in the interests of brevity].</p> <p>As a general comment, it is considered that the draft Neighbourhood Plan is well presented, clear and logical. It is considered that the concept plan for Policy ABY3 (criteria for development of land at The Orchard) could be very helpful for decision takers, particularly in light of the recent withdrawal of the planning application for the site. The development of Policies ABY4 (criteria for development of land at Walshes Farm) and ABY5 (criteria for development of land west of Apostle Oak Cottage) have, however, to some extent been overtaken by events with both sites now having planning permission. In light of this, it is considered that the policies ABY4 and ABY5 may have a very limited shelf life. It is noted that a number of policies overlap with similar policies in the SWDP, but this does help ensure general conformity with the SWDP and emerging SWDPR. To add clarity or ensure conformity with national or SWDP policies we have suggested alternative wording for some policies. These are only suggestions and it is obviously for the Parish Council or NDP Steering Group to decide which suggestions to accept.</p>	This general comment and support for the Plan is welcomed. The comments in respect of policies ABY3, ABY4 and ABY5 are addressed below in their respective sections.	No change.
	Chapter 1	C	It would be helpful if Chapter 1 set out the next steps for the development of the NDP, including submission of the Plan to the District Council, Regulation 16 consultation, Examination and (subject to the outcome of the Examination) Referendum.	It is agreed this would be a useful addition to the introductory chapter.	Include a step-by-step flow chart detailing the steps achieved to date and the remaining stages.
	Para. 1.11	C	It should be noted that the planning application for development of land at The Orchard was withdrawn in July 2020.	Noted.	Update para. 1.11 to reflect the position on the three SWDP allocations.
	ABY1	C	Policy ABY1 is an overarching policy, but it is considered that it has regard to the Framework and is in general conformity with the SWDP.	Noted.	No change.
	ABY2, paras.		It is considered that Policy ABY2 provides flexibility to take account of viability	This support for policy ABY2 is	Update para. 5.4 to refer to the

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Parish Council's response	Amendments to Abberley draft NDP
	5.4 and 5.5.		<p>considerations but also provides a strong steer for decision makers when determining planning applications.</p> <p>Paragraph 5.4 and 5.5 – For clarity, it is suggested that the first sentence of paragraph 5.4 (which relates to the AECOM local Housing Needs Assessment) is moved to paragraph 5.5. The remainder of paragraph 5.4 relates to the Indicative Housing Requirement figures provided by the South Worcestershire Councils in July 2019. It should be noted that the figures are indicative, should be considered as a minimum requirement and could be subject to change. For accuracy, it is suggested that the following wording in the final sentence of paragraph 5.4 "... capacities assumed in the SWDP ..." is amended to "... indicative number of dwellings assumed in the SWDP allocations ..." For clarity, it is suggested that the first sentence of paragraph 5.5 is amended to read "The AECOM Assessment ..."</p>	<p>welcomed.</p> <p>Para. 5.4 deals with the issue of the quantity of housing required. The latest position is set out in the indicative housing requirement provided to the Parish Council by the South Worcestershire Councils in July 2019. It is agreed that para. 5.4 should be updated and amended accordingly.</p> <p>The suggested amendment to para. 5.5 is helpful and is agreed.</p>	<p>indicative housing requirement for the Neighbourhood Area provided by the South Worcestershire Councils in July 2019. Include this document in the evidence base at Appendix A. Otherwise amend para. 5.4 as indicated.</p> <p>Amend para. 5.5 as indicated.</p>
	ABY3	C	<p>It is considered that Policy ABY3 sets out a more detailed policy for SWDP 59/1. The Reasoned Justification for Policy ABY3 correctly includes reference to the planning application 19/01746/FUL submitted in January 2020 for the demolition of existing buildings on site and development of 11 new dwelling houses. It should be noted that the applicant has recently (29<sup>th</sup> July 2020) withdrawn the planning application. Paragraph 63 of the Framework says "Provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer). Footnote 9 on page 15 helpfully clarifies that Abberley is a designated rural area.</p>	<p>This support for policy ABY3 is welcomed.</p> <p>The reasoned justification to the policy together with para. 1.11 should be updated to reflect the withdrawal of the planning application referred to.</p>	<p>Update paras. 1.11, 5.6, and footnote 7</p>
	ABY4	C	<p>The reasoned justification for Policy ABY4 rightly states that the site has planning permission for 26 dwellings (planning application 16/00816/OUT) and the criteria for development of the site would only be applied to any subsequent application(s) which may come forward. It is understood that the developers are likely to build out the permitted scheme, subject to some tweaks to suit their house types. There are reservations about whether County Highways would permit the loop road in the manner shown. The access design off the main road was subject to particular scrutiny at outline stage on appeal. It would likely have to be a cul-de-sac with terminus rather than a complete loop. Whilst Policy ABY4 makes clear that the criteria for development of the site would only be applied to any subsequent</p>	<p>The sites at Walshes Farm (ABY4) and west of Apostles Oak Cottage (ABY5) both have outline and reserved matters planning permissions for residential development. It is agreed that policies ABY4 and ABY5 should be deleted in order to remove the potential for confusion between the approved schemes and those indicated in the concept plans.</p>	<p>Delete policies ABY4 and ABY5, the supporting text and plans 3 and 4.</p>

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Parish Council's response	Amendments to Abberley draft NDP
			application(s) which may come forward, it is considered that the policy could raise local residents expectations of what might be delivered on the site and the policy may have a very limited shelf life.	In the event that the approved schemes do not proceed, policy ABY11 will help guide determination of any future applications, alongside the SWDP's site allocation and other policies. Policy ABY11 incorporates a link to the Abberley Design Guide.	
	ABY5	C	The reasoned justification for Policy ABY5 rightly states that the site was granted consent on appeal in May 2016 for up to 25 dwellings, with reserved matters approved in April 2020, and that the criteria for development of the site would only be applied to any subsequent application(s) which may come forward. It is understood that the development approved for this site is broadly in line with the criteria for development/concept plan except for the green space being located towards the rear of the site adjacent to the bat corridor instead of being centrally positioned. Whilst Policy ABY5 makes clear that the criteria for development of the site would only be applied to any subsequent application(s) which may come forward, it is considered that the policy could raise local residents expectations of what might be delivered on the site and the policy may have a very limited shelf life.		
	ABY6, para. 5.19.	C	<p>To provide greater clarity for applicants and decision makers it is suggested that the Neighbourhood Plan includes a map showing the location of the community facilities that are to be protected under Policy ABY6.</p> <p>Part 1 of Policy ABY6 echoes, and is therefore in general conformity with, SWDP 37B (Built Community Facilities).</p> <p>Part 2 of Policy ABY6 seeks to reflect paragraph 182 of the Framework which says "Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed."</p> <p>Part 3 of Policy ABY6 puts the onus on the applicant to demonstrate that a development proposal will not have a significant adverse impact on the operation of a community facility within its vicinity. It is not clear how applicants would do this or whether they would have the necessary information to assess the impact of their proposal on a community facility.</p>	<p>It is agreed it would be useful to include a plan showing the location of the community facilities listed in this policy.</p> <p>The support for the first part of the policy is welcomed.</p> <p>In respect of proposals which may affect an existing facility, it is agreed that the assessment of significant adverse effect should be for the decision maker to determine, rather than placing this onus on the applicant to demonstrate.</p> <p>The suggested addition to the policy to address new or the enhancement of existing facilities is welcomed and agreed.</p>	<p>Add plan to show the location of the community facilities listed in policy ABY6.</p> <p>Amend the second sentence of policy ABY6 to read: "Proposals in the vicinity of an existing community facility should not have a significant adverse effect on its operation, taking account of any mitigation proposed."</p> <p>Add suggested wording to policy ABY6 to cover new or the enhancement of existing community facilities.</p>

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			<p>Paragraph 5.19 then indicates a community aspiration to extend / enhance Abberley Village Hall to provide recreational facilities and additional car parking. Currently, Policy ABY6 relates to the protection of existing community facilities, but does not address the provision of new or enhancement of existing community facilities. If the Neighbourhood Plan were to address the provision of new or enhancement of existing community facilities it is suggested that policy wording along the following lines may be appropriate:</p> <p><i>The provision of new built community facilities or the enhancement of existing facilities will be required to demonstrate that:</i></p> <ol style="list-style-type: none"> <li>1. <i>the siting, scale and design respects the character of the surrounding area, including any historic and natural assets;</i></li> <li>2. <i>the local road network can accommodate the additional traffic without compromising highway safety, and;</i></li> <li>3. <i>adequate off-road vehicle and cycle parking is provided on the site.</i></li> </ol>		
	ABY7	C	<p>Policy ABY7 identifies four Landscape Types in the Neighbourhood Area. It is suggested that the Neighbourhood Plan includes a map showing the landscape types so that it is evident how applicants and decision makers know which landscape types apply to individual applications. Policy AB7 is considered to be in general conformity with SWDP 25 (Landscape Character).</p>	<p>This support for policy ABY7 is welcomed. It is agreed it would be useful to include a plan showing the extent of each of the landscape types referred to in the policy.</p>	<p>Add plan to show the extent of each of the landscape types referred to.</p>
	ABY8	C	<p>Planning policies can seek to protect specific views where this is justified in the wider public interest (for example from a public footpath, right of way, roadside, or other publicly accessible land). It is noted that paragraph 6.10 says that all of the proposed views can be seen from publicly-accessible rights of way and viewpoints.</p> <p>Plan 5 helpfully identifies the location and direction of the proposed Key Views. To provide a practical framework for decision makers (and applicants), ideally it would be helpful if the map showed the extent of the proposed Key Views, although it is acknowledged that the photographs on page 28 provide a good indication of the extent of the views.</p> <p>It is noted that the proposed Key Views KV8 and KV5 potentially conflict with SWDP 59/1 and the proposed SWDP 100 (land east of Clows Top Road). The Reasoned Justification explains that the proposed Key Views were</p>	<p>This support for the inclusion of a policy on key views is welcomed. It is considered that the policy is clearly written and unambiguous, such that it can be applied consistently and with confidence by decision makers when determining planning applications, including with regard to the extent of each of the key views. KV8 is across an area of woodland (a Priority Habitat Inventory site) to the south of SWDP 59/1; there is</p>	<p>No change.</p>

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			<p>identified by the NDP Steering Group. It is important that objective criteria are established for the identification and grading of views. For example, in visual assessments generally, published guidance such as Natural England's LCA guidance and the Landscape Institute's Guidance for Landscape and Visual Impact Assessment 3rd Edition ('GLVIA3') explain the factors which contribute to the very highest levels of visual value.</p>	<p>no potential conflict with this allocation. At the time of writing the proposed SWDP 100 has not progressed beyond Preferred Options stage; in the meantime, KV5 is a valuable view of open countryside enjoyed by users of the village hall/car park. Key views have been identified by the NDP Steering Group as being important for the protection of local distinctiveness, landscape character and village setting.</p>	
	ABY9	C	<p>Policy ABY9 reflects, and is therefore in general conformity with, SWDP 22. Plans 6 and 7 helpfully show the location of the Local Wildlife Sites, Local Geological Sites and Grassland Inventory Sites which provides a practical framework for applicants and decision makers.</p> <p>However, it is considered that Policy ABY9 would only apply to those biodiversity and geological sites (or parts of sites) within the Neighbourhood Area. Large parts of the Local Wildlife Sites are outside the Neighbourhood Area. Shavers End East and Abberley Hall East appear to be wholly outside the Neighbourhood Area and so should be excluded from Policy ABY9.</p> <p>For clarity it is suggested that Policy ABY9 is re-worded to make clear that the policy would apply to those parts of the sites of local biodiversity and geodiversity importance within the Neighbourhood Area.</p> <p>For clarity, it is suggested that Hill Farm Meadows is listed as the Grassland Inventory Site.</p>	<p>This support for policy ABY9 is welcomed. The policy identifies sites of local biodiversity and geodiversity importance to which SWDP policy 22D or its successor would apply, and recognises that some of these extend outside the Neighbourhood Area boundary or immediately adjoin it. The reason for including the two adjoining sites in the policy is explained in para 6.13. Overall, national planning policy promotes an approach to protecting biodiversity and geodiversity which seeks to maintain and enhance networks of habitats and green infrastructure, and to plan for the enhancement of natural capital across local authority boundaries (NPPF para 171). With this in mind it is considered the policy as worded ensures the immediate context for the protection of locally important sites can be understood by</p>	<p>Add "Hill Farm Meadows" to policy ABY9 as the identified Grassland Inventory Site.</p>

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				applicants and decision makers, and as such is appropriate.	
	ABY10	C	The allocation of each Local Green Space requires robust justification. Appendix B on pages 47 – 48 of the draft Plan provides an assessment of the 7 proposed Local Green Spaces against the criteria in paragraph 100 of the Framework. Plan 8 shows the location of the 7 proposed Local Green Spaces. The boundaries of each proposed Local Green Spaces need to be clearly identifiable in the Neighbourhood Plan. It is suggested that the boundaries of some Local Green Spaces (particularly LGS6 and LGS4) could be clearer if the map was A4 size or the LGS's were shown as insets.	It is agreed that the extent of the Local Green Spaces would be clearer if Plan 8 was to be A4 size.	Plan 8 to be A4 size in landscape format.
	ABY11	C	The principle of ABY11 appears to have regard to the Framework and to be in general conformity with SWDP 21. In relation to design principle 3, paragraph 150b of the Framework says any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards. Therefore carbon neutral development can be encouraged (which Policy ABY11 does) but not required. New development is already required to comply with Building Regulations. For ease of reference and to ensure that the Abberley Design Guide is applied consistently by applicants and decision takers it is suggested that consideration could be given to incorporating the Design Guide in to the Neighbourhood Plan as an Appendix.	This support for policy ABY11 is welcomed. The policy seeks to encourage but does not require carbon neutral development (in criterion 2). The Design Guide is a separate document which is readily accessible via the link provided at footnote 19 and does not need to be incorporated into the NDP.	No change.
	ABY12, paras. 7.16 and 7.17	C	Policy ABY12 appears to have regard to the Framework. Paragraphs 7.16 and 7.17 identify 8 potential non-designated heritage assets. It is considered appropriate for the Parish Council to nominate non-designated heritage assets for consideration in the MHDC Local List SPD through the neighbourhood plan process. Whilst paragraph 7.17 makes clear that the Parish Council will seek the inclusion of these non-designated buildings and structures in the District Council's Local List it is suggested that it would be more helpful to list the proposed non-designated assets in Table 2 (Community Actions) because i) listing them in ABY12 potentially suggests a status that they do not currently have and ii) if any of the proposed assets are outside of the Conservation Area (currently it is not clear) then it would not be appropriate to include them in Policy ABY12.	This support for policy ABY12 is welcomed. Table 2 already includes a Community Action on non-designated heritage assets and it is considered that the further details set out in paras. 7.16 and 7.17 is appropriately situated and referenced. Policy ABY12 does not list or otherwise refer to the proposed non-designated heritage assets.	No change.

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	ABY13, para. 8.3	C	Policy ABY13 largely echoes, and is therefore considered to be in general conformity with, SWDP 12. Paragraph 8.3 refers to support for the re-use of redundant rural buildings for employment uses. Does the parish have a view on the re-use of redundant rural buildings for residential uses?	This support for policy ABY13 is welcomed. On the question of the re-use of redundant rural buildings for residential uses, the Parish Council is content to rely on the provisions of the NPPF and the SWDP.	No change.
	ABY14		It is considered that much of ABY14 has regard to the Framework and is in general conformity with SWDP10. It is, however, suggested that criterion 1 may be difficult to apply consistently and with confidence and that it may be more appropriate for the scale of development to be appropriate to the location rather than proportionate to local business and community needs. As an example, a supermarket could be "proportionate to local business and community needs", but the scale may not be appropriate to a semi-rural location. It is also considered that criterion 4 may be difficult to apply consistently and with confidence. It is suggested that criterion 4 be more positively worded along the lines of "provide sufficient parking to accommodate the vehicles of all users and staff".	This support for policy ABY14 is welcomed. The suggested changes will help the policy to be applied consistently and with confidence, and are agreed.	Amend policy ABY14 as follows: Criterion 1 to read: "...a scale appropriate to the location; and" Criterion 4 to read: "provide sufficient parking to accommodate the vehicles of all users and staff".
	Community actions	C	It is considered that the proposed Community Actions on pages 43 and 44 are clearly identifiable and separate from the proposed land-use policies.	Noted.	No change.
Abberley Village Green Trust	ABY10 (LGS2)	S	Abberley Village Green, formerly pasture and woodland, was acquired at auction by a group of villagers in September 1994 with the aim of providing a place for public recreation at the heart of Abberley Village. There had been attempts in earlier years to obtain Planning Permission for various building developments on the land and the aim of the founders of the Green was to protect the Village Green from such developments in perpetuity and, at the same time, opening it for access to all. Subsequently, in 1996, the land comprising the Village Green was conveyed to a Charitable Trust (Abberley Village Green Trust. Registered Charity No. 1056055). Residents of Abberley were invited to contribute to the foundation of the Village Green and such was the support from well-wishers that most of the loans and legal costs associated with purchasing the Village Green and establishing the Charitable Trust were quickly recovered. Since then, the maintenance of the Village Green has been supported by kind donations from individuals, the Parish and District Councils and the National Lottery but most	This support for the designation of Abberley Village Green as Local Green Space is welcomed. The comment from the Trust confirms that the green space is demonstrably special to the local community and holds a particular local significance. The designation will, if approved, have effect only when decisions are made under the Planning Acts with regard to the development plan (of which the NDP, when made, will be a part), notably planning applications which are decided by MHDC. In all	No change.

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			<p>of all, from the tireless devotion of groups of volunteers who have transformed the Green from rough pasture and unkempt woodland, to this priceless asset at the heart of our village, open to all.</p> <p>The key to understanding the governance of the Village Green is made clear in the Second Schedule to its Governing Document:</p> <p>(1) (a) The property herein transferred (hereinafter called "the Trust property") shall be held upon trust for the purposes of a public recreation ground for the benefit of the inhabitants of Abberley and the surrounding area for the provision of recreation and leisure time occupation in the interests of social welfare with the object of improving the quality of life for the said inhabitants</p> <p>(b) The Trust property shall be used for the benefit of persons resident within or persons having a business within the Parish boundary of Abberley</p> <p>(c) The Committee may not change the use of the freehold land comprised in the Trust property (except in the case of minor or insignificant matters) without first calling a meeting of the Villagers (as hereinafter defined) at which meeting not less than fourteen days notice (stating the terms of the resolution that will be proposed thereat) shall be posted in a conspicuous place or places on the Trust property and advertised in a newspaper circulating in the area of benefit and if such a decision shall be confirmed by three quarters of the Villagers present and voting at such meeting the Committee may change such use with the prior consent of the Charity Commissioners and so long as no change would result in the land being held for purposes which would not be charitable in law.</p> <p>Thus, Abberley Village Green Trust believes that it has put in place the conditions and controls to protect the Village Green from undesirable development and a mechanism for consultation and local democratic approval of any significant change to the Green and its associated woodland. Abberley Village Green Trust welcomes the proposal in the Abberley Neighbourhood Plan to designate the Green a "Local Green Space". Whilst it does not seem, in the view of the Trust, to afford any additional protection for the Village Green, it nevertheless is in good alignment with the Trust's aims and underlines the contribution of the Village Green to the community and its contribution to the well-being of local residents and the many visitors to our village.</p> <p>However, the management of the Village Green remains the sole responsibility of the Abberley Village Green Trust and our support for the designation of the Village Green as a "Local Green Space" must in no way impact upon the upon the ability of the Trust to manage the Green in line with</p>	<p>other respects, landowner rights and obligations are unchanged. This includes the ability of the Trust to manage the land in accordance with its governing objectives.</p>	

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			its Governing Document and charitable law.		
Canal and River Trust	NDP	-	No comment to make.	Noted.	No change.
Coal Authority	NDP	C	<p>As you will be aware the Neighbourhood Plan area lies within the current defined coalfield.</p> <p>According to the Coal Authority records there are recorded risks from past coal mining activity at shallow depth in the area, including; mine entries and recorded and likely unrecorded coal mine workings. It is noted that the Neighbourhood Plan does not propose to allocate any new sites for development, with those sites included in the document already formally allocated in the South Worcestershire Development Plan. On this basis we have no specific comments to make.</p>	Noted.	No change.
Environment Agency	NDP	C	<p>We would not, in the absence of specific sites allocated within areas of fluvial flooding, offer a bespoke comment at this time. You are advised to utilise the attached Environment Agency guidance and pro-forma which should assist you moving forward with your Plan. The purpose of the guidance is to assist the preparation of the NDP, including an appropriate evidence base. This includes consideration of some of the relevant environmental issues that should be considered, including flood risk (from rivers and sea), water quality, water resources and includes latest Climate Change recommendations for flood risk. However, it should be noted that the Flood Map provides an indication of 'fluvial' flood risk only. You are advised to discuss matters relating to surface water (pluvial) flooding with Malvern Hills District Council and their drainage team as the Lead Local Flood Authority (LLFA).</p>	Noted.	No change.
Herefordshire and Worcestershire Earth Heritage Trust	Objectives	C	<p>The trust welcomes the recognition of Local Geological Sites within the plan as a whole, but is disappointed that the Objectives for the natural environment do not mention the protection of the Local Geological Sites within and adjacent to the Neighbourhood Area. The Trust recommends that Local Geological Sites be mentioned alongside Local Wildlife Sites, which enjoy the same level of protection in the law, by replacing: "To identify and safeguard Local Wildlife Sites and other features of biodiversity interest, recognising their contribution to ecological networks and to green infrastructure." with</p>	This change is agreed.	Para. 3.2, objectives for the natural environment, amend as indicated.

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			"To identify and safeguard Local Wildlife Sites and Local Geological Sites, as well as other features of biodiversity or geodiversity interest, recognising their contribution to ecological networks and to green infrastructure."		
	ABY9 and ABY10	C	<p>The search for Local Geological sites within the Abberley area highlighted a misunderstanding over the location of the Abberley Village Quarry. The site shown on Plan 7 (page 32) is the existing Local Geological Site, designated for its scientific value. A second quarry in the village was not originally designated as a Local Geological Site because it was not well exposed. Its value for educational purposes depends on accessibility for schools and the public. It is southwest of the quarry shown on Plans 7 and 8 and higher up the hill. The H&amp;WEHT now understand that this site is owned by a public body, the Abberley Hills Preservation Society and that the community intend to maintain it as a Local Green Space, open to the public. Screens on the quarry floor are left over from the quarrying of the Aymestrey limestone and contain many fossils. Platforms on either side enable safe access to higher parts of the quarry, where Ludlow Siltstones are exposed. For these reasons, the Trust is proposing to the local planning authority that this site should be designated as a Local Geological Site, valued for its educational, historical and aesthetic properties. The proposed name for this site is <b>Abberley Parish Quarry</b>.</p> <p>The Trust recommends that the Neighbourhood plan be amended so as to</p> <ol style="list-style-type: none"> <li>1) clarify the geographical locations of the two quarries</li> <li>2) clarify the position of both quarries regarding their status as a) Local Geological Sites and b) Local Green Spaces</li> <li>3) indicate any action that the parish plans to take to ensure safe access.</li> </ol> <p>In particular, the following sections need to be amended:</p> <p><b>Section 6.13:</b> To include the second quarry (Abberley Parish Quarry) in the list of Local Geological Sites (assuming that when the updated plan is released, the LGS status is fully recognised by the planning authority).</p> <p><b>Plan 7:</b> A revised plan, showing the new site (subject to the same caveat as above).</p> <p><b>Local Green Spaces:</b> Ensure that this list is correct with regard to deconflicting the names for local quarries. Is it intended that both quarries be Local Green Spaces or just one, and if so, which one?</p> <p><b>Plan 8:</b> Revise the plan if necessary to ensure the correct quarry or quarries are included.</p> <p><b>Appendix B, page 48:</b> Ensure that LGS7 is correctly named in line with the rest</p>	This clarification is welcomed and the NDP will be amended to suit. The designation of Abberley Parish Quarry as Local Green Space will not affect landowner rights and obligations, including in respect of issues of access and safety.	<p>Policy ABY9, plan 7 and para. 6.13: include Abberley Parish Quarry as a Local Geological Site, in addition to Abberley Village Quarry.</p> <p>Policy ABY10, plan 8 and Appendix B: amend re LGS7 to refer to Abberley Parish Quarry instead of Abberley Village Quarry (this will no longer be proposed as Local Green Space).</p>

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			of the document. Address the issues of access and safety as appropriate.		
Historic England	NDP	S	<p>Thank you for the invitation to comment on the draft Neighbourhood Plan. Historic England is supportive of both the content of the document and the vision and objectives set out in it.</p> <p>We commend the general emphasis placed upon the maintenance of local distinctiveness and the conservation of landscape character, building upon the findings of the Worcestershire Landscape Character Assessment, including policies for the protection of green space, bio and geo diversity and important views. We also fully support policies for the conservation of local distinctiveness and the protection of the built environment including affording recognition to locally important heritage assets through offering them for inclusion in the Malvern Hills Local List.</p> <p>The Village Design Guide is admirable in its detail providing an invaluable context for the Plan that will be of great assistance in guiding future development, as evidenced by its application in providing criteria for development and concept plans for current housing allocations.</p> <p>Overall the plan reads as a well-considered, concise and fit for purpose document which we consider takes a suitably proportionate approach to the historic environment of the Parish. Beyond those observations we have no further substantive comments to make on what Historic England considers is a good example of community led planning.</p>	This support for the NDP is welcome.	No change.
National Grid	NDP	-	We have reviewed the above document and can confirm that National Grid has no comments to make in response to this consultation.	Noted.	No change.
Natural England	NDP	-	Natural England does not have any specific comments on the draft Abberley Neighbourhood Development Plan.	Noted.	No change.
Severn Trent	ABY3, ABY4, ABY5	S/C	<p>Severn Trent is supportive of point 7 within each of these policies relating to provision of a sustainable urban drainage strategy. We would encourage you to extent this policy to include wording relating to developers following the drainage hierarchy relating to surface water drainage strategy. The following policy wording would be encouraged to be included:</p> <p><i>'All applications for new development shall demonstrate that all surface water discharges have been carried out in accordance with the principles laid out within the drainage hierarchy, in such that a discharge to the public sewerage systems are avoided, where possible.'</i></p> <p>In particular we would like to identify that sites in policies ABY3 and ABY5 look</p>	This change is agreed. Policies ABY4 and ABY5 are to be deleted (see response to MHDC comments on these policies, above).	Amend policy ABY3 criterion 7 to include reference to surface water drainage avoiding discharge to the public sewerage system where possible.

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			to be some distance from the nearest watercourse, therefore use of SuDS are strongly encouraged within the site to manage surface water sustainably.		
	ABY10	C	Whilst we do not currently have any flood resilience schemes proposed within Abberley, it is important that planning policy does not prevent flood resilience works from being carried out if required in the future. Green spaces can also be enhanced where a good SuDS, scheme that incorporates design principles to enhance biodiversity and Amenity as well as attenuation. We would therefore recommend the following policy wording is added: <i>'Development of flood resilience schemes within local green spaces will be supported provided the schemes do not adversely impact the primary function of the green space.'</i>	Policy ABY10 allows development which would result in the loss of Local Green Space where very exceptional circumstances arise. Provided that the promoters of flood resilience works could make the case that the development proposed met this test, such schemes could proceed and as such are not prevented.	No change.
	ABY11	C	Severn Trent is supportive of point 2) inclusion of water conservation. We are supportive of the use of water efficient fittings and appliances within new properties, we encourage of the optional higher water efficiency target of 110 Litres per person per day within part G of building regulations. Delivering against the optional higher target or better provides wider benefits to the water cycle and environment as a whole. This approach is not only the most sustainable but the most appropriate direction to deliver water efficiency. We encourage the inclusion of the following policy wording to support this aim: <i>'Development proposals should demonstrate that the estimated consumption of wholesome water per dwelling is calculated in accordance with the methodology in the water efficiency calculator, should not exceed 110 litres/person/day.'</i>	This support for policy ABY11 criterion 2 re water conservation is welcomed. The further inclusion of the 110 litres/person/day target is agreed.	Amend policy ABY11 criterion 2 to include the water efficiency target of 110 litres/person/day for new housing.
WCC Education team	NDP	C	Worcestershire Children First note the comments in the draft Plan. Where planned housing development has been identified, we will continue to monitor housing growth in and around the local area and respond appropriately to ensure a sufficiency of school places, in line with current published policies. We will continue to work with schools serving the local area to protect and enhance school assets and playing fields, in line with Government policies on the delivery of statutory education provision.	Noted.	No change.
WCC Historic environment team			The Abberley Draft Neighbourhood Plan recognises and is positive towards the need to protect and enhance the area's character, landscape, green infrastructure and historic environment. It aims to promote well designed new development which is appropriate to local character and context. It also	The NDP addresses historic environment issues of local concern within the context provided by SWDP policy 24 on	Add to policy ABY11 criterion 1: "Proposals for historic farmsteads should be sensitive to their distinctive character, materials and

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			<p>recognises that there are heritage assets beyond those that are designated, that should be protected.</p> <p>The Plan, however, does not take account - apart from the Historic Environment Assessment for the South Worcestershire Joint Core Strategy - of County Level Historic Environment resources, principally the County Historic Environment Record. Its evidence base for the Historic Environment is therefore incomplete.</p> <p>The 2019 Abberley Design Guide and the draft Plan focus on the Character Areas – Abberley Conservation Area and Abberley Common – and potential development sites. Policies to protect and enhance heritage assets, including archaeology, outside of these defined spaces, could be strengthened, for example the parish contains a significant number of traditional farmsteads, any future development and re-development of which should be informed by the Worcestershire Farmsteads Assessment Framework:  <a href="http://www.worcestershire.gov.uk/info/20230/archive_and_archaeology_projects/1023/historic_farmstead_characterisation">http://www.worcestershire.gov.uk/info/20230/archive_and_archaeology_projects/1023/historic_farmstead_characterisation</a>  <a href="https://historicengland.org.uk/advice/caring-for-heritage/rural-heritage/farm-buildings/">https://historicengland.org.uk/advice/caring-for-heritage/rural-heritage/farm-buildings/</a></p>	<p><i>Management of the Historic Environment</i> (this includes reference to the Worcestershire Historic Environment Record). Historic England has stated that the NDP takes a suitably proportionate approach to the historic environment of the Parish, and there is no required 'tick box' list of evidence against which the NDP's evidence base could be said to be incomplete. It is agreed that reference should be made to traditional farmsteads and to the Worcestershire Farmsteads Assessment Framework.</p>	<p>form;". Add reference to the Worcestershire Farmsteads Assessment Framework to the supporting text. Include this document in the evidence base at Appendix A.</p>
WCC Public health team		C	<p>We recommend that the Plan contains a section that encourages developers to include Health Impact Assessment as a key tool in their proposals. An HIA Screening is recommended to identify whether the health and wellbeing impact of the proposal warrants the need for an HIA. Information on the process including HIA templates are outlined in the Planning for Health in South Worcestershire, Supplementary Planning Document adopted in 2017 and are available at: <a href="http://www.swdevelopmentplan.org/?page_id=13484">http://www.swdevelopmentplan.org/?page_id=13484</a></p>	<p>It is agreed that Health Impact Assessments (HIA) should be encouraged in order to promote healthy communities. Suitable reference to this policy aim, and to HIAs and the Supplementary Planning Document (SPD) referred to, should be included in policy ABY11 and its supporting text as appropriate.</p>	<p>Add reference to enabling and supporting healthy lifestyles to policy ABY11. Add reference to Health Impact Assessments and the Planning for Health in South Worcestershire SPD to the supporting text. Include this document in the evidence base at Appendix A.</p>
		C	<p>We recommend that the plan makes reference to the JSNA to assess local health needs and how the Neighbourhood Plan can support good health and improve health.  <a href="http://www.worcestershire.gov.uk/info/20122/joint_strategic_needs_assessment">http://www.worcestershire.gov.uk/info/20122/joint_strategic_needs_assessment</a>.</p>	<p>Agreed.</p>	<p>The Joint Strategic Needs Assessment forms part of the wider policy context for development planning including the SWDP, and does not need referencing in the NDP.</p>
		C	<p>We welcome the reference to health and wellbeing, however we feel it could be made more explicit in the document and recommend inclusion in the</p>	<p>Agreed.</p>	<p>Incorporate reference to sustaining and improving the health and</p>

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			vision and objectives of the plan.		wellbeing of the local community in the Vision and objectives for community facilities, Local Green Space and design.
		C	As well as retention and maintenance of footpaths, every opportunity to support travel by foot and bicycle should be encouraged, to reduce parking requirements at local venues (shops, village hall, school) and to increase day to day physical activity levels (a strategic theme of the WCC Health & Wellbeing Strategy). It is also recommended that safe cycle parking is included at community venues.	Reference should be included to walking and cycling (active travel) in the design policy ABY11. Active travel is also promoted through Community Action CA6. The provision of cycle parking at new community facilities is addressed above (see response to comment by MHDC on policy ABY6).	Add reference to walking and cycling to policy ABY11 at criterion 3.
		C	In addition to Policy ABY3: Criteria for development of Land at The Orchard, we recommend that reference is made in all development criteria that encourages the retention and/or development of opportunities for residents to grow their own produce, such as allotments and community orchards, as highlighted in South Worcestershire Planning for Health SPD (see above).	Agreed. Apart from the site at The Orchard where provision is made in policy ABY3 for a new orchard, opportunities for such provision may be limited in the plan period.	Suitable reference to be included in the explanatory text to policy ABY11.
		C	We encourage the inclusion of a requirement to prioritise renewable energy features on affordable and shared ownership homes to reduce risks of fuel poverty for those most at risk. Making renewable energy features on all new homes would have a positive impact on climate change.	Agreed.	Add reference to the generation of renewable energy being a particular priority for affordable and shared ownership homes in policy ABY11 criterion 2.
		C	We suggest that a section is added to the Plan that accommodates the needs of teenagers and young people. If the village is to develop housing to attract a mixed population for sustainability into the future, facilities for these groups need to be planned for.	Policy ABY2 seeks to provide housing to meet local needs and includes reference to the younger and older populations.	No change.
		C	A dementia-friendly environment helps people with dementia reach their full potential and does not cause needless disability. The design of a building and an environment can have a significant effect on a person with dementia, therefore we recommend that the plan encourages developers to provide houses and a local environment that is designed to accommodate the needs of people with dementia <a href="https://dementia.stir.ac.uk/design">https://dementia.stir.ac.uk/design</a> .		

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			Further information to inform the long term health improvements needs for the community can be found using this resource: <a href="http://www.localhealth.org.uk/">http://www.localhealth.org.uk/</a>		
WCC Public rights of way team	NDP, Community Action 6	C	Thank you for the opportunity to comment on this NDP. We are pleased to see that Public Rights of Way are mentioned throughout and there is a general aspiration for new developments to link up with the existing network.  Our only suggestion is: Community Action 6 is specifically about ‘..working with Landowners to promote the maintenance of PRoW, seek improvement and connectivity..’  Comment – This could include, ‘..working with WCC and Landowners..’ – (similar to CA-4 in the same table).	This change is agreed.	Amend Community Action 6 as indicated.
WCC Sustainability team	ABY11	S	It is encouraging to see recognition of the issues of energy efficiency and renewable energy in the Plan. We are also supportive of Policy ABY11. However, the Plan could also seek to request that energy efficiency of new homes goes beyond the standards required in building regulations which would be in line with the NPPF. Improving the energy efficiency standards of new homes will help to support achievement of net zero carbon targets and reduce the risk of fuel poverty for new residents. It would also be encouraging to see recognition of the issue of fuel poverty within the Plan. The latest figures show that 10% of households in Worcestershire are considered to be fuel poor, meaning they have high energy costs but a low household income.	This support for policy ABY11 is welcomed. Policy ABY11 already encourages new homes to achieve the highest standards of energy conservation, being ideally carbon neutral whilst as a minimum complying with Building Regulations. This will help address fuel poverty. Reference to the generation of renewable energy being a particular priority for affordable and shared ownership homes is to be added to policy ABY11 in response to comment by WCC Public health team.	No change.
	Para. 7.9	S	We are fully supportive of the ‘dark skies’ approach and that external lighting should be kept to a minimum and be designed to be energy efficient, unobtrusive and avoid light spillage.	This support for para. 7.9 is welcomed. In light of this comment and others from the community in respect of the value attached to dark skies, additions are proposed to record a desire to avoid the introduction of street lighting. As this is a highway matter outside the	Add to end of para. 7.9: “The introduction of street lighting will be resisted by the Parish Council when its views are sought pursuant to highway planning and design by Worcestershire County Council or developers.”.

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				scope of the NDP, it is addressed in supporting text and as a Community Action.	Add a new Community Action to table 2 re street lighting: "To resist the introduction of street lighting when the views of the Parish Council/ community are sought pursuant to highway planning and design by Worcestershire County Council or developers."
	-	C	The Plan does not make reference to future electric vehicle infrastructure. We would welcome consideration of the inclusion of/support for electric vehicle charging points in new developments to support air quality objectives. The Road to Zero strategy produced by the UK Government outlined the intention to consult on proposals for all new UK homes to have an electric vehicle charge point where appropriate. This consultation concluded October 2019 – currently awaiting response from Government.	This change is agreed.	Add reference to electric vehicle charging points to policy ABY11.
	-	C	The Plan could consider improvements to water efficiency in new homes, including the provision of water butts.	Policy ABY11 already identifies water conservation as an aspect of building sustainability, and a further change is proposed in response to a comment on this policy by Severn Trent, above. The provision of water butts in new homes could usefully be highlighted in the supporting text to policy ABY11.	Add reference to water butts to para. 7.3.
	-		There is minimal reference to climate change – adaptation or mitigation, within the Plan. Climate change mitigation and adaptation are central to the NPPF. The UK Climate Change Act 2008 sets legally binding targets for the UK to reduce carbon emissions to net zero by 2050. New developments will be around for a considerable number of years, it is important that they remain fit for purpose over their lifetime as the climate changes. The Plan and Design Guide could consider actions to improve local resilience to climate change, such as wider guttering, green roofs, permeable paving etc. The Neighbourhood Plan could also take account of the Worcestershire Partnership Climate Change Strategy.	A number of aspects of policy ABY11 support local resilience to climate change, particularly in terms of building sustainability. The explanation for these measures should encompass reference to the climate change context and to the Worcestershire Climate Change Strategy.	Amend policy ABY11 and the supporting text to incorporate reference to ensuring that new development includes adaptation or mitigation to climate change. Add the Worcestershire Partnership Climate Change Strategy to the evidence base at Appendix A.

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	-	C	Fully supportive of references to waste management in the Design Guide. The Neighbourhood Development Plan/Design Guide could also include options for onsite composting for new homes, including provision of compost bins for all new homes.	Policy ABY11 already identifies the recycling of waste as an element of building sustainability. The provision of compost bins in new homes could usefully be highlighted in the supporting text to the policy.	Add reference to on-site composting options including compost bins to para. 7.3.
WCC Transport Planning Unit	NDP	C	I would like to make a comment on the Abberley Neighbourhood Plan on behalf of Worcestershire County Council Development Control Team. To ensure that any development within the neighbourhood plan meets good practice with regards to streetscape design they should adhere to the Worcestershire County Council's Streetscape Design Guide. This document is currently under review but when approved you will be able to find it on the County Council website <a href="http://www.worcestershire.gov.uk/info/20007/travel_and_road">http://www.worcestershire.gov.uk/info/20007/travel_and_road</a>	The Worcestershire Streetscape Design Guide is already referenced within the Abberley Design Guide, but it is agreed a further reference within the NDP would be helpful to applicants and decision makers.	Include reference to WCC's Streetscape Design Guide (latest version Spring 2020) in the supporting text to policy ABY11 and in the evidence base at Appendix A.

## Part 2: Community comments

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Parish Council's response	Amendments to Abberley draft NDP
Resident 1	Para. 1.11	C	The planning application on the third site was withdrawn at the end of July before a decision was made.	See response to MHDC comment on this paragraph, above.	See amendment made in response to MHDC, above.
	Para. 2.8	C	There is also the hamlet of Elms Green is on the A443 to the west of Abberley Common	Add Elms Green to para. 2.8.	Amend para. 2.8 to include reference to Elms Green.
	Para. 2.12	C	Will be 7 LGS sites.	Noted.	Amend para. 2.12 as indicated.
	Para. 5.7	C	The planning application was withdrawn at the end of July 2020.	See response to MHDC comment on policy ABY3, above.	See amendment made in response to MHDC, above.
	Plan 3	C	Although a start has yet to be made, the developer has put up flags and a large sign – if work has started before the edit is completed, I think its worth mentioning. Should the actual plan which now has consent be included rather than the concept plan from AECOM?	See response to MHDC comment on policy ABY4, above.	See amendment made in response to MHDC, above.
	Plan 4	C	I think it would be helpful to add to the caption that the A443 is at the bottom of the plan – its rather difficult to work out where it is as the junction with The Common and the village shop are cropped off.	See response to MHDC comment on policy ABY5, above.	See amendment made in response to MHDC, above.
	Para. 6.13, Plan 7	C	An additional LGS, Abberley Parish Quarry is in the process of being approved.	See response to comment by Herefordshire and Worcestershire Earth Heritage Trust on policies ABY9 and ABY10, above.	See amendments made in response to Herefordshire and Worcestershire Earth Heritage Trust, above.
	ABY10, Plan 8, Appendix B	C	The correct name for Local Green Space 7 is Abberley Parish Quarry – this is a separate site to the Local Geological Site of Abberley Village Quarry. The quarry marked on Plan 8 is Abberley Village Quarry, not the Local Green space. The quarry is named incorrectly in the table on p48 – should be Abberley Parish Quarry – it is in the process of being designated as a local Geological site (it isn't currently) – it was this NP process that highlighted that this quarry had not been recorded and due to the similarity of names with Abberley Village Quarry, it has taken a while to unpick.		
Para. 7.17	C	Missing heritage assets are the milestones that should be on the A443 just east of the Village Shop and close to the Village Hall on the Clows Top Road.	A Community Action could be included to support the suggested	Add new Community Action to reference the issue raised.	

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			The Milestone Society had a campaign of re-instating missing milestones, so possibly, these could be replaced.	re-instatement.	
	NDP	C	Very much in favour of the NP and commend it.	This support for the NDP is welcomed.	No change.
Resident 2	NDP	S	I am supportive of the whole plan and cannot see any problems with the vision and objectives. I congratulate the team on their hard work and effort in producing a document which does not close the door on future developments but seeks to ensure that these will be in sympathy with the character and amenities of the village.	This support for the NDP is welcomed.	No change.
Resident 3 (2)	Para.7.9	S	I am very strongly in support of this point. Light pollution is of particular concern to me. what are the regulations in regard to this? My worry is that there is a clause somewhere in planning procedure that says a certain number of houses require street lamps, or at the positioning of a road junction etc.	This support for the NDP is welcomed. On dark skies and street lighting, see also response to WCC Sustainability team.	No change.
	NDP	C	A very thorough and thoughtful document. I am broadly in support of this plan. If this is adopted however, I think the number of houses in Abberley will have reached the maximum possible, without changing the nature of the village completely.	This support for the NDP is welcomed.	No change.
Resident 4	2. Abberley Neighbourhood Area – Economy.	C	As most employment opportunities lie east of the River Severn I am very concerned about the increased level of traffic on local roads and at the river crossings. There is not just an increased population in Abberley to consider but the accumulative effect from the new housing in other villages all along the A443 and in the Teme Valley.	Comment noted.	No change.
	2. Abberley Neighbourhood Area – Key Issues 2.17	C	The 3 points I consider most important in this section are; Energy efficiency in the new builds, Keeping the open feel within the village and around the outskirts, Sympathetic design of new homes	Comment noted. These are points further and particularly addressed in policies ABY7, ABY8, ABY10 and ABY11.	No change.
	Vision and Objectives	S	This vision is completely admirable and I strongly hope that it can be upheld against the planning requirements from County or National level.	This support for the NDP's vision is welcomed.	No change.
	4.	C	I do wonder whether any development can be truly sustainable. It seems a	The essence of the planning	No change.

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	Sustainable Development. 4.1		contradiction. Development leads to more people, more use of finite resources as regards building supplies, increased traffic, more pollution, higher demands on water and energy supplies. Is it achievable?	system's approach to achieving sustainable development is to balance economic, social and environmental objectives. Policy ABY1 sets out what this means for the Abberley Neighbourhood Area.	
	5. Social and Community 5.5	O	I recognise that there is a need for new housing and if affordable houses can bring in young families that will be of benefit to the life of the village in many ways. I also recognise that things cannot stand still or remain completely unchanged in the 21st century and that these issues affect the whole country. The mixed housing requirement is very sensible as long as the scale is appropriate and there is thought given to the design of these homes. ABY3,4,and 5. These concept plans look well thought out and a considerable proportion of each site seems to have been designated as green space with the beneficial retention of hedgerows and good linking pathways. However, with a current population of 836, 56 new homes with an occupancy level averaging 2.5 equates to an extra 140 people. This is 16% of the current population which to me seems quite a large increase in a village the size of Abberley. My fear is that if these numbers are allowed then it will possibly then allow more to be squeezed in. If there then happens to be windfall development too then the character of Abberley will change considerably.	These comments are noted and the support for the approach taken in the Social and Community chapter welcomed. As explained in the plan, there is already planning permission for a total of 51 dwellings on land at Walshes Farm and west of Apostle Oak Cottage, and a further six are envisaged on the SWDP allocation on land at The Orchard. These are existing planning commitments and allocation, not proposals of the NDP.	No change.
	Landscape Character 6.4 – 6.7 and Key Views	C	The NCA and LCA were very interesting to read and I feel that following the guidelines in 6.4 to 6.7 is an essential consideration. The same applies to Key Views – Abberley is in wonderful countryside and the character must be retained.	Comment noted.	No change.
	ABY11, paras. 7.8 and 7.9	C	ABY11 Is there any imperative for builders to include the following? – Solar panels or similar Rainwater harvesting The highest modern standard of roof/wall insulation Permeable surfaces in front gardens/drives to prevent run-off.	These and other aspects of building sustainability are all included within policy ABY11, and are to be further addressed in response to comments by Severn Trent and WCC Sustainability team (see above). Such measures may be encouraged by the NDP where they are not already required by	Add reference to the suggested measures to para. 7.3.

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				Building Regulations.	
	Para. 7.8	C	7.8 I am concerned by access onto the A443 from the development west of Apostles Oak Cottage – This road currently has a 40mph limit which is regularly exceeded, especially by lorries. Will the 30mph limit (or even less would be better) be extended up the hill and can traffic calming be included.	Road safety falls outside the scope of the NDP and for this reason is addressed as Community Actions (CA1 and CA2). CA2 specifically identifies the A443 adjacent Abberley Common as a priority location.	No change.
	Para. 7.9	C	7.9 I feel there should be no street lights on the new developments – our skies are quite nice and dark at the moment.	This support for the NDP is welcomed. On dark skies and street lighting, see also response to comment by WCC Sustainability team on para. 7.9.	No change.
	Community Action CA1	C	CA1 – Because of the steep hill either side of the junction of Abberley Common with the A443 just below the shop, many large lorries seem to speed down in both directions to keep up their momentum to get up the next hill. This makes walking dangerous and unpleasant. As I stated in my comment on 7.8 I consider it vital to have improved traffic calming and lower speed limits. The 30mph limit is continually exceeded by cars and motorbikes too.	As explained above, road safety falls outside the scope of the NDP and for this reason is addressed through Community Actions (CA1 and CA2). CA2 specifically identifies the A443 adjacent Abberley Common as a priority location.	No change.
	Community Action CA6	C	CA6 – To encourage more walking within the village ongoing maintenance of roadside footpaths and public footpaths is essential. Living in Stud Lane I would like to see the footpath extended along the A443 from Abberley Park to the Elms Hotel. There are more homes down Stud Lane now since the barns were converted, fruit pickers live on Orchard Farm for many months of the year and there are many staff and visitors based at The Elms Hotel as well as existing residents in the Elms Green area. It would be lovely to have a better connection to the shop and the pub without having to take our life in our hands. Constructing a path along here would also open up the public footpath network through Riddings Coppice, down to Stanford Bridge or up to the Worcestershire Way for residents walking from the main village.	The maintenance and extension of the public rights of way network falls outside the scope of the NDP and for that reason is addressed as a Community Action (CA6). The suggested footpath is for the Parish Council to consider for promotion in conjunction with landowners and WCC.	No change
	NDP	C	This was a fascinating document to read and I would like to thank everyone	Comment noted.	No change.

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			who worked so hard on it.		
Resident 5	Pages 7-9 Key Issues, Aims and Objectives	S	I am broadly supportive of this plan because it identifies key issues raised through consultation with the local community and demonstrates sensibly and considerately how it will address these through the aims and objectives. With thoughtful and sensitive building design, protection and enhancement of both the landscape and biodiversity, Abberley has an opportunity to remain an attractive place to live and work both now and for future generations.	This support for the NDP is welcomed.	No change.
Resident 6	ABY2	S	The recommendations for provision of affordable housing will contribute to the diversity of the community and ensure that younger people are encouraged to remain, or move to the village thereby enabling the elder generations to remain.	This support for the NDP is welcomed.	No change.
	ABY3	S	The plan addresses the traffic issues with regards to vehicular access to the Orchard Development site, an area which has already seen numerous crashes and car damage. I particularly like the inclusion of a community park and orchard on this site which will greatly contribute to a sense of community cohesion as well as the ecological biodiversity and sustainability of the village environment.	This support for the NDP is welcomed.	No change.
	NDP	C	I feel that the suggested design criteria sufficiently address and respect Abberley Village's responsibility for providing and contributing to the provision of available, suitable housing in Worcestershire, whilst at the same time addressing the environmental, aesthetic and community needs of the village. At present I feel that Abberley does suffer from being slightly disconnected, with previous planning seeming to create distinct areas and footpath access is poor. The Common area particularly suffers from having little, to no, community green spaces. I believe that the suggestions in this plan adequately address these issues and that any planning applications that followed these criteria could be welcomed by the community rather than objected to.	Comment noted.	No change.
Resident 7	5 Social and community	S	I support the plan's statement that any new housing should be in a range of types and styles and that they should be designed to be a part of the village rather than sitting on their own on the periphery. I also strongly feel that, should all the three proposed developments go ahead, Abberley Common will	Comment noted. The NDP covers the period up to 2030, to align with the SWDP.	No change.

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			have increased in size by far more than the planning guidelines suggest, and that it should not have any further developments permitted for the foreseeable future. We owe it to future generations to protect the character and qualities of our rural settlements.		
	NDP	C	I would like to thank all those involved in creating this plan, it is much appreciated.	Comment noted.	No change.
Resident 8	NDP/ Housing delivery report para. 6.6.	S	Agree completely with statement in paragraph 6.6 in Abberley Neighbourhood delivery plan: Housing delivery report, we have demonstrated that the housing development growth expectations have been met and significantly exceeded meaning there is no need for further development on the sites CFS0601, CFS0603, SWDP59/1.	Comment noted. SWDP59/1 (Land at The Orchard) is an existing development plan allocation, not a proposal of the NDP. The other sites referred to are not proposed for allocation for development in the NDP.	No change.
	NDP/ Design guide p. 46.	O	In the design guide 2019 page 46, the plan showing development on the land to the West of Apostles Oak is incorrect and should be adjusted to reflect this please, it shows 27 frontages, when in fact there will be 25 dwellings and fewer frontages as some are flats/semidetached. Eight of those shown are at the Western boundary which is already causing significant stress to residents living directly below as the land will be raised here increasing the overbearing nature of the development. The need to ensure development reflects the character of the area is emphasised throughout this document, yet the developments already planned do not follow this guidance. Adding more dwellings on this site would further exacerbate the problems caused, so is it possible to put the actual plan here? There should be no encouragement to extend this development.	Policy ABY4, supporting text and plan 4 are to be deleted (see response to MHDC comment on this policy, above). The concept plan shown in the Design Guide is high-level and illustrative, not prescriptive.	See amendment made in response to MHDC, above.
	NDP	C	Agree in general with everything, we certainly have exceeded our required housing needs. To develop further will alter the character of our village completely. Please ensure plans shown reflect actual plans (I am aware these have changed multiple times).	The NDP does not include any new site allocations for housing, over and above those already identified in the SWDP, but does seek to provide additional criteria to guide development and to reflect local concerns. The plan referred to (plan 4) is to be deleted from the NDP (see above).	No change.

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Resident 9 (2)	ABY10, LGS3 Glebe land	O	<p>As owners of the Glebe, the proposed local Green Space LGS3 we object to the designation of our land as a local green space for the following reasons:</p> <ol style="list-style-type: none"> <li>1.It is land to which the public do not and never have had access. The public have access to all other proposed local green sites</li> <li>2.The Glebe land does not "serve" the community and is of no importance to the community.</li> <li>3.The Glebe land is not and never has been part of the Conservation Area of the village. Consideration was given to making it part of the Conservation area and expressly rejected.</li> <li>4.The Glebe land was, with our permission, investigated as being a possible mill site. The investigation proved inconclusive.</li> <li>5.The contention that the Glebe land is the possible site of a medieval mill remains only as a possibility.</li> <li>6.The Glebe land is of no special value to wildlife. <ol style="list-style-type: none"> <li>(a)It does not feature as one of the Local Wildlife Sites set out in paragraph 6.10[p29] of the consultation draft.</li> <li>(b)No special or rare species inhabit the land.</li> <li>(c) No special or rare species are identified in the Consultation draft.</li> </ol> </li> <li>7.The Glebe land is not woodland and is not specifically mentioned on the Priority Habitat Inventory site and has never been specifically so designated. To our knowledge it does not feature on the "MAGIC" map that identifies such sites.</li> <li>8.In order to comply with paragraph 100 of the National Planning Policy Framework the proposed "local green space ie our Glebe land: <ol style="list-style-type: none"> <li>(a)must be shown to be" DEMONSTRABLY SPECIAL to a local community -It is not</li> <li>(b)must be shown to have a particular local SIGNIFICANCE-no such significance is demonstrated.</li> </ol> </li> <li>9.The onus of proving that the Glebe land is special/of particular local significance and serves the local community at this stage lies upon the local parish council who in our submission have failed to do so.</li> <li>10.The fact that the Glebe land is "part of an inter-connected series of green spaces" is irrelevant. The proposed designation either complies with paragraph 100 or it does not. If mere physical connection was sufficient or</li> </ol>	The proposed designation of the Glebe land as Local Green Space has been re-assessed in light of this comment and the information provided. It is agreed that the land is not demonstrably special to the community and does not hold a particular local significance, and as such does not meet the NPPF requirements for Local Green Space designation.	Delete the Glebe land from policy ABY10, plan 8 and Appendix B.

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			relevant (which we expressly deny it is) the plan on p.34 (Plan 8) shows a large garden (marked with an arrow) that would physically complete the connection. 11.The Glebe land is already subject to a specific covenant that prohibits its open sale or development. The covenant requires us not to use the land "save for agricultural, equestrian or amenity purposes".		
Resident 10	ABY11 criterion 4	C	The amount of new houses is confusing – numbers are for above the amount Abberley has to accommodate. This doesn't help with maintaining the countryside/environment by having a bigger burden. Quantities of houses keep changing – once building starts there is no control and we risk losing the lovely country/village atmosphere.	Whilst the indicative number of dwellings assumed for two of the SWDP allocations have been exceeded, the NDP provides criteria including in policy ABY11 to guide future development.	No change.
Resident 11	NDP	C	It's accepted that Abberley has to contribute to providing more housing, however we also have to protect its environment. Building more than we need to has a massive impact on not only the countryside but it then requires more infrastructure to accommodate the quantity of houses, school, doctors, shop etc. From the very young to the elderly they will need more facilities/support and that will have to be provided. Once we have lost the countryside its gone for ever.	Comment noted. The NDP does not include any new site allocations for housing, over and above those already identified in the SWDP, but does seek to provide additional criteria to guide development and to reflect local concerns.	No change.
Resident 12	NDP	S	I think the people that have developed this plan have worked hard and done a good job.	Comment noted.	No change.
Resident 13	NDP/ Housing delivery report paras.5.13-5.15.	C	Any development of sites east/rear of Clows Top Road (CFS0601, CFS0603) would significantly harm designated heritage assets, compromise the open countryside character of the landscape & lead towards a merging of Abberley Common & Abberley Village. Given the number of new houses already included in the Plan and their impact on traffic + the additional strain on our GP surgery & school, further development on these sites would be disproportionate and detrimental to the neighbourhood as a whole.	The sites referred to are not proposed for allocation for development in the NDP.	No change.
	NDP	C	I believe that the Abberley NDP has been positively constructed and is a pragmatic approach to the recognised need (if not desire) for new housing development in this area. During lockdown Abberley & it's surrounding pathways have proved a popular	Comment noted. The NDP does not include any new site allocations for housing, over and above those already identified in the SWDP, but	No change.

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			<p>destination for visitors seeking to escape the stress of urban life. This is a historic &amp; beautiful area of countryside which provides pleasure for many. If over-developed to the point where the character of that countryside is lost, where will people find the opportunity to enjoy all the emotional &amp; educational benefits of exploring nature? This is our children's heritage &amp; something we can never regain once spoiled.</p> <p>We have already seen developers elevate house numbers/site above the figures presented to our parish council. Planning has been granted for sites on appeal with little if any consideration of the well founded reasons for initial refusal. There is a growing sense of helplessness &amp; hopelessness amongst residents about what feels like the destruction of the character of our environment &amp; community.</p> <p>On a practical note, as someone who commutes into Worcester I already struggle to pass the "bottle neck" at Holt Bridge ... any increase in housing will inevitably exacerbate this problem. Furthermore, the nature of the roads through the village (hazardous enough to have speed cameras consistently placed in 2 spots) and the lack of safe on-road parking also causes considerable concern – most particularly around the school where children are required to cross the road both morning and evening as a matter of course.</p> <p>Ultimately, we accept the need for new housing but it needs to: be carefully positioned &amp; designed to cause minimum impact on the landscape, respect our designated heritage assets &amp; the separation of the Conservation Area from the more contemporary areas of development, be constructed sustainably &amp; with character (not a "cookie cutter" approach), not exacerbate existing traffic problems &amp; fit within the services available (GP, school etc).</p>	<p>does seek to provide additional criteria to guide development and to reflect local concerns. Highways matters are outside the scope of the NDP and for this reason are addressed as Community Actions (CA1 – CA4).</p>	
Resident 14	Page.33, paras. 6.16 and 6.17	S	<p>I would like to think that the importance in value to these local green spaces will be taken into account when any future house building is considered beyond those in this plan. I am thinking of LGS5 in particular.</p>	<p>The designation of Local Green Spaces confers a protection equivalent to Green Belt. The effect is that development which would result in their loss is ruled out other than in very special circumstances.</p>	No change.

Consultee	NDP ref	Type C = Comment O = Object S = Support	Comment received	Parish Council's response	Amendments to Abberley draft NDP
	NDP	C	I congratulate the Parish Council on the hard work that has produced this excellent plan. I like their attitude of understanding how the planning laws have to be put in place whilst trying to keep the countryside ambience that is Abberley. I also understand that this comment is not part of what is needed on this form!	Comment noted.	No change.
Resident 15	NDP	S	Agree to the plan.	This support for the NDP is welcomed.	No change.
	NDP	C	Thank you to the whole Abberley team for your thorough and robust approach to seeing this huge project through till the end. Your efforts are very much appreciated.	This support for the NDP is welcomed.	No change.
Resident 16	Issues, p.7, para. 2.17		I would like to see the issue of Safety become more prominent in the Plan, in particular but not limited to Road Safety. Noting that road safety is referenced right at the end of the report (CA1 and CA2 on p47) it could give the impression that safety is an afterthought when it really should be a top priority. On the subject of safety, the issue of the two recent deaths at Shaver's End quarry should be considered by the committee. Shaver's End quarry is outside the Abberley boundary but the impact of crowds, illegally parked cars, visitors, drug use and the tragic deaths on our village is significant.	Road safety falls outside the scope of the NDP and for this reason is addressed as Community Actions (CA1 and CA2, as noted in the comment). The issues raised in respect of Shaver's End are not a matter for the NDP.	No change.
	NDP	C	I thoroughly enjoyed reading the Draft for consultation and supporting documents. I learned a lot about the village and it's history that I didn't know before. It was interesting to learn exactly where the boundary was and get a better sense of 'place'. Preservation of the character, open spaces and views are incredibly important and I thought that was well represented in the plan. I am much less concerned than I was before about housing development if what the Plan permits is accepted and adhered to by developers.	Comment noted.	No change.
Resident 17	NDP	C	Whilst agreeing with the main tenant of the comments and recommendations by the Parish Council, in the light changing Government Policies and the loosening of planning laws that could override local objections I would like to raise an important issue about road safety in the village, particularly with regard to the B4202 (Clows Top Road). This road is flanked by a substantial	Road safety falls outside the scope of the NDP and for this reason is addressed as Community Actions (CA1 and CA2). CA2 specifically identifies Clows Top Road at	No change.

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			<p>number of houses in the village a number of which have families of children of varying ages, and a popular primary school. The path is very narrow, especially where hedges and verges have been allowed to overrun it, and poses real dangers to walkers of any age, but particularly those, such as children who are not as aware of danger. Vehicles are sometimes parked on this path which forces pedestrians to walk into the road to pass them. I would estimate that about half of the vehicles using this road are respectful of the 30 mile-an-hour speed limit; however, a substantial number of drivers habitually speed through at well over the speed limit and seem unaware of the residential nature of this part of the road. Some regularly exceed the national speed limit, especially during the evenings and early mornings during their commute. This popular rat run for quarry lorries poses additional problems, especially when they pass each other, leaving pedestrians shrinking into hedges of driveways.</p> <p>The road is dangerous enough as it is; therefore if more housing development takes place in the village this factor should be a priority in the Development Plan and suitable addressed.</p> <p>I am aware that this has been discussed a number of times by the Parish Council but it has led to no serious action, despite promises by Councillor Pollock. Occasionally a Traffic Officer sets a speed trap at the junction with The Common (and when chatting with him he has caught motorists driving in excess of 60mph), but this is really a joke as an intervention because once spotted incoming drivers are flashed as a warning, making the intervention rather pointless.</p> <p>I would like to propose that the Parish Council makes more forceful representations with WCC to improve the safety of this road for the existing residents and certainly for future housing developments. In Cambridgeshire and North Yorkshire their councils have been very proactive in introducing 20mph limits through villages and constructing chicanes for the prioritisation of traffic. Such measures could always be initially introduced on a temporary basis to gauge the impact for the local people.</p> <p>Housing needs may override these local recommendations for the Neighbourhood Plan; however, the safety of Abberley residents in the present and the future surely should be at the top of the list.</p>	<p>Abberley Common as a priority location.</p>	
Resident 18	Page 41, para. 8.4	S, C	<p>a) Broad Band facilities are referenced by the plan but I feel the significance is under-rated in that good broadband enables a great variety of 'home based' business propagating local employment; associated benefits are reduced travelling and greater use of local services.</p>	<p>Both broadband and public transport provision fall outside the scope of the NDP and for this reason are addressed as</p>	<p>No change.</p>

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			b) increase use of bus services to local towns with reduction in traffic by the provision of an off-road 'park and ride' facility in the village; I appreciate this would have 'management' issues but feel its important for the ageing population profile and commuters.	Community Actions (CA5 and CA7). Issues of viability, likely patronage and site location/availability would need to be addressed in an initial evaluation of the feasibility of a local park and ride facility.	
	NDP	S	Excellent piece of work incorporating much detail - well done.	Comment noted.	No change.
Resident 19	ABY8	C	My only comment is that the view from the rear of properties on the east of Clows Top Road in a south easterly direction towards Abberley Hills is not specifically referred to as a Key View and I believe it should be.	Key views have been identified by the NDP Steering Group as being important for the protection of local distinctiveness, landscape character and village setting. It is not considered that any additional Key Views are required to fulfil these purposes.	
Resident 20	ABY8	C	Key Views are an important part of the enjoyment of the environment in Abberley. In recent years it has been noticeable that some hedges are not been cut back to a height that maintains the ability to see above the hedgerows. I understand that farm machinery are getting bigger but walking along some of the lanes around the village now can feel like walking in a green tunnel and the views have been lost.	Comment noted. Hedge cutting specification is outside the scope of the NDP, but could be further addressed as part of Community Action CA3.	Amend Community Action CA3 to highlight the issue raised.
	ABY7	C	To ensure that the old oak trees within the area are all identified and recorded for the Woodland Trust, in continuation of the work undertaken by the Medieval Abberley project.	Comment noted. This is outside the scope of the NDP, but could be included as a new Community Action.	Add new Community Action to reference the issue raised.
	NDP	C	There has been a considerable amount of work undertaken to produce such a well thought out and comprehensive document. Thank you to all that have been involved with the research and preparation to enable the village to move forward with a framework.	Comment noted.	No change.
Resident 21	NDP	C	You have done such a lot of work to pull this together and it does paint a picture in detail of Abberley. I do hope that this is accepted as the way forward for Abberley and the boundary lines for development are adhered to in order to protect the very essence of this beautiful area.	Comment noted.	No change.

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Resident 22	ABY4	C	As you can see by my address I can speak from experience with regard to the proposed access point to the Walshes Farm site. I cannot think of a more dangerous location than that of being opposite another junction, School and Village Hall all involving traffic and this proposal would add even more, surely a siting lower down the hill nearer to the Water Treatment Plant would be a safer location please feel free to forward my comments.	The Walshes Farm site now has planning permission which includes details of the proposed access.	No change.