

**Abbots Bromley Neighbourhood Development Plan  
Consultation Statement (amended)  
Date: October 2022**

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## 1. Introduction

This Consultation Statement accompanies the submission of the Abbots Bromley Neighbourhood Development Plan. It summarises the community engagement programme and the Regulation 14 consultation that were undertaken. It shows how the requirements of Regulation 14 of the Neighbourhood Planning (General) Regulations 2012 (as amended) has been satisfied.

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## **2. Summary of Community Engagement**

### **2.1 Approach to community engagement**

At all stages of production, the Neighbourhood Plan has been a fully inclusive community-led document. Community engagement has been essential in assisting progress of the plan through to submission of the completed plan. The Parish Council and Neighbourhood Plan Group has invested significant resource and effort into achieving this.

### **2.2 What was done?**

Throughout the process, the group has sought the views and opinions of local residents and businesses through a wide range of communication techniques. These included questionnaires; surveys; public meetings; parish-wide newsletters; village noticeboards; social media and direct conversations with stakeholders

The Neighbourhood Plan Group obtained initial public opinion at an early stage during January – March 2016. A simple questionnaire was created and sent to the 750 households in the parish.

The main enquiry was to determine what residents and businesses considered to be the community's current strengths and weaknesses and what improvements/changes they would like to see that would benefit the parish wide community in the future.

96 responses to the questionnaire were received and a number of key areas emerged that guided development of the 'Vision' and 'Aims' for the plan. This informed the overall plan content and the basis for the creation of the Policies.

The key areas identified were:-

Heritage & Conservation  
Housing  
Community Facilities  
Natural Environment  
Traffic&Parking

Further mid-stage public engagement, designed to gain a deeper understanding of the key areas, made it clear that the public supported the production of a Neighbourhood Plan for the parish.

The following table shows the significant public engagement events that informed the content of the Neighbourhood Plan. These events also helped public understanding of progress during the development of the Neighbourhood Plan “Aims” and “Policies”.

<b>TYPE OF ENGAGEMENT</b>	<b>DATE</b>
Annual Parish Assembly	May 2016
Parish-wide Questionnaire (to gather further detail for the Housing key area)	June - Oct 2016
Public Meeting (to present information on Housing and Taffic & Parking key areas)	Mar 2017
Annual Parish Assembly	May 2017
Annual Parish Assembly	May 2018
Public Meeting (to gather further detail for all identified key areas)	Dec 2018
Public Meeting (to gather further detail on Traffic & Parking identified key area)	Feb 2019
Public Meeting (to gather further detail on Heritage & Conservation identified key area)	Mar 2019

Public Meeting (to gather opinion through a Young Peoples Forum)	Apr 2019
Public Meeting (to gather opinion on Local Housing need)	May 2019
Annual Parish Assembly	May 2019
Church House Public Meeting (Overall update and discussion on Next Steps)	June 2019
Parish-wide Questionnaire (to gather opinion / approval for the policy headings in preparation for commencement of Draft NP production)	Aug – Sept 2019

### 2.3 Inclusion

The primary aim throughout has been to engage with stakeholders (principally residents and businesses in the parish and the local planning authority). Because of the demographic of the parish, with a more elderly population than average, special care was taken to communicate with older residents, who may not have access to the internet. This was done primarily through use of the “Bromley Bulletin” delivered to all households and through drop-in events. To engage with the other end of the age spectrum, a Young Persons Forum was held in April 2019.

## 2.4 Outcomes/Feedback

Feedback to public response was provided through the use of similar methods to the above as well as provision of an overall review of the process at each engagement event. Consistency in the approach has been important and community interest and involvement has increased accordingly.

The Neighbourhood Plan Group (NPG) minuted reports provide a source of information on community engagement activities throughout the process up to August 2021. The minutes record issues relevant to public engagement that have been available for consideration when producing the plan. These may be found on the following web page link:

[Abbots Bromley Neighbourhood Plan web page](#)

Abbots Bromley Parish Council minutes also provide a source of information for the community engagement process and record progress after August 2021, when the NPG was reformed to three councillor members. These minutes may be found at:

[Abbots Bromley Parish Council web page](#)

During the Covid pandemic, public meetings and meetings of the Neighbourhood Plan Group had to cease. Fortunately, the plan had reached the stage where information gathering had been completed and drafting of the plan was well advanced. Drafting was continued by the secretary to the group, working remotely, in conjunction with the chairman. During this time, the Parish Council continued receiving monthly updates on progress and these were reported in the Council minutes, available online and on village noticeboards. The public were also kept informed by articles in the quarterly "Bromley Bulletin", distributed to all properties in the parish.

### **3. Pre-Submission Consultation (Regulation 14)**

#### **3.1 How the Consultation Was Undertaken**

The pre-submission consultation under Regulation 14 was held over a six-week period between 7<sup>th</sup> February and 21<sup>st</sup> March 2022. The consultation was designed to comply with the “Gunning Principles”:

- The consultation took place at a formative stage of the plan when it was in draft form.
- The consultation gave sufficient reasons for all the proposed policies in the plan to be subject to consideration.
- The consultation allowed for the statutory six-week period to permit adequate time for consideration and responses.

Prior to the commencement of the Regulation 14 consultation, the Parish Council made a special effort to inform local residents and businesses by means of a special edition of the “Bulletin” providing general information about the plan and answers to anticipated questions about the process.

A further “Bulletin” was distributed in the week before the commencement of the 6 week consultation period, giving the dates of drop-in meetings at which members of the public could raise any queries about the plan and obtain a printed copy on request.

The consultation was preceded by the following additional means of publicity:

- Advertising banners erected at the entrances to the village and at prominent locations within the village.
- An announcement in the Abbots Bromley Parish magazine.
- Use of social media: an announcement on “Spotted in Abbots Bromley” and the Parish Council website.
- Posters on all village noticeboards, in local shops and the dedicated Neighbourhood Plan noticeboard.
- The five 2 hour “drop-in” sessions held at Church House resulted in the attendance of over 40 residents, who were able to obtain a printed copy of the draft plan and discuss the plan with councillors.

A further written communication in the form of a double-sided A4 sheet was distributed to all households in the final week of the consultation.



## 3.2 Statutory Consultees

A statutory consultee list was obtained from East Staffordshire Borough Council and the Neighbourhood Plan emailed to all consultees with an accompanying letter informing them how and by when to make representations.

Organisation	Address
Coal Authority	DebraRoberts@coal.gov.uk
Homes England	enquiries@homesengland.gov.uk
Natural England	consultations@naturalengland.org.uk
Environment Agency	Noreen.nargas1@environment-agency.gov.uk
Historic England	e-wmids@historicengland.org.uk
SCC County Archaeological Service	stephen.dean@staffordshire.gov.uk
SCC Historic Environment Record	her@staffordshire.gov.uk
National Trust	Kim.Miller1@nationaltrust.org.uk
Woodland Trust	operations@woodlandtrust.org.uk
Network Rail	townplanningw@networkrail.co.uk
Highways England	ominder.bharj@highwaysengland.co.uk
Uttoxeter Rural PC	urpcparishclerk@gmail.com
Kingstone PC	clerk.kingstone.pc@gmail.com
Marchington PC	marchingtonpc@btinternet.com
Colton PC	coltonpc@hotmail.co.uk
Newborough PC	June.bullingham@virginmedia.com
Hoar Cross PC	Mja.hxpc@hotmail.co.uk
Blithfield PC	Pda60@hotmail.com
South Staffordshire Water	Contact us south-staffs-water.co.uk
Severn Trent Water	Planning.apwest@severntrent.co.uk
Staffordshire Wildlife Trust	planning@staffs-wildlife.org.uk
Staffordshire County Council	james.chadwick@staffordshire.gov.uk
East Staffordshire Borough Council	corrine.o'hare@eaststaffs.gov.uk
Trent and Dove Housing	charlie.riley@trentanddove.org
Sport England	maggie.taylor@sportengland.org

Bodies representing disabled persons	enquiries@disabilityrightsuk.org
Western Power Transmission	Fao Mr Richard E Smith
National Grid	Nationalgrid.uk@avisonyoung.com
SCC Flood Risk Management	flood.team@staffordshire.gov.uk
Richard Clarke First School	
Woodard Schools	
Savills	
Uttoxeter Town Council	tina.jeffery@uttoxetc.org.uk

### 3.3 Issues

The main issues and concerns raised by the persons consulted and how these issues and concerns have been considered and, where relevant, addressed in modifications to the proposed neighbourhood development plan are set out in the next part of this statement.

#### 4. Responses to Regulation 14 Representations

Ref:	Consultee	Policy/ Site Ref.	Representation	Response
1	Resident		NP seeks to safeguard the village. Plan has my full support.	None required
2	Richard Clarke First School	DEC1	<p>A well thought out document which is easy to navigate and also has great clarity.</p> <p>Would like the plan to provide further information on the school eg length of time it has existed; value added to community. Add the school to organisations the plan is intended to support under Aim 2. Attracting young families to the village would ensure the success of the school and the health and success of the village.</p> <p>Would like more family orientated housing including 4-bed. Also encourage social housing suitable for families as well as market value homes.</p> <p>Would like 20mph speed limit on Schoolhouse Lane; discouraging building on existing car parks; providing adequate parking spaces on new developments.</p>	<p>NP can't make decisions under education legislation. Aim 2 relates to employment only.</p> <p>On the range of housing, DEC 1 already includes family housing. HNA identifies oversupply of 4/5-bed houses in village.</p> <p>Highway issues, public car parks and speed limits outside scope of NP. Will add "curtilage parking within dwellings should be proportionate to the size of the property" to the interpretation of transport policy. Other comments will be forwarded to the highway authority.</p> <p>No changes required.</p>

3	Resident		<p>In agreement generally with content of NP; main concern is development of A.B. School. Would support conversion to a retirement village to include first time buyer properties. Would like to see sports facilities at school available for village to use. Would support moving Richard Clarke First School to A.B. School site, also current doctor's surgery. Developer of school site could help fund new sports pavilion at ABSA.</p>	<p>A matter for discussion between Woodard and Education Authority. The Parish Council can pass this suggestion on to SCC, also the point about village surgery. No changes to plan required.</p>
4	Resident	<p>P2 Ch1.1</p> <p>P25</p>	<p>Well done to everyone involved with producing NP. It is a well-constructed piece of work, which when approved at referendum will allow community opinion to be represented at future stages of planning affecting the Parish.</p> <p>The first paragraph statement (<b>The Neighbourhood Plan forms part of the statutory plan for...</b>) This is already covered in the second to last paragraph. It would be better to remove the first paragraph and reword the second to last paragraph.</p> <p>Near the bottom of the page, reference is made to meetings that support HNA conclusions. Reference to minutes for 15/3/2017 – these do not exist. There are minutes for 15/3/2019 referring to HNA, but it was not an open meeting. Reference to minutes 4/4/2019 was an open “Young Peoples” forum with no specific reference to HNA. This leaves two meetings referring to the HNA; only the 2/5/2019 meeting was open.</p>	<p>This will be considered, and amendments made if required.</p> <p>These references will be corrected.</p>

		DEC3  p25 1 <sup>st</sup> and 4 <sup>th</sup> bullets  P12	<p>Developers of A.B. School site should carry out tree surveys prior to any on site works to allow for consideration of TPOs. Existing facilities/amenities within the site for retention by the Parish should be itemised.</p> <p>References to the “NP website” should be changed to read “NP web page” as the website the plan is accessed through is the abbotsbromley.com web site.</p> <p>The sentence (<b>On the NDP website, minutes of the following consultations are recorded</b>) should be NP web page. The word “consultations” should read “engagements”. Also refer to minutes for 11/12/2018 where feedback and progress were discussed.</p>	<p>Consideration will be given to adding these two points to the Interpretation and Guidance section of DEC3.</p> <p>These references will be corrected.</p> <p>These will be amended in the text.</p>
5	A. B. Nostalgia Team		<p>Grateful for good work undertaken. You have captured the importance to residents of our local heritage and natural environment.</p> <p>Will this Plan make recommendations for nomination of building sites?</p> <p>If Abbots Bromley private school is developed, will the Plan be able to influence future outcomes?</p> <p>Will future long term planning needs for the parish be considered at any review of this plan (and ESBC’s Local Plan)? Particular consideration must be made for a capital project to alter the main roads in the parish. Traffic congestion through the</p>	<p>Currently, the plan does not seek to identify or allocate land for development. The statement on p2 of NP will be changed to bold type to highlight this. Policy DEC3 deals specifically with the school site and once the NP becomes “a made plan”, the policy will have the same weight as current Local Plan policies.</p> <p>Both the NP and the Local Plan will evolve over time.</p>

			parish (particularly Abbots Bromley village) needs to be addressed through the creation of a bypass for traffic that is merely transiting the area.	Highway considerations are outside the remit of a neighbourhood plan. No changes required.
6	Resident	DEC3  TIN4	Any development must consider improvements to local highways and additional accesses into the A.B. School site. Ideally only one developer for whole site with a collective strategy. Use sustainable energy provision in development including EV charging points. Social value considerations should also be provided for as well as local bus service upgrades. Use terminology in the policy that will not age.	Will give consideration to including these points in the Rationale or Interpretation/Guidance sections of policy DEC3.  Outside the remit of the plan.  TIN 4 has been amended.
7	Resident	P5  P7  P13  P20 DAH1	<b>“Towards the eastern end of Bagot Street, an eighteenth century building...”</b> This is one building with one listing. Its correct charity name is Abbots Bromley Hospital.  <b>“There are a few designated listed buildings that sit outside of the Conservation Area.”</b> Delete “of” – an Americanism.  Might A2 and A3 be exchanged? This may be a numerical result from answers to questionnaires, but the current A1 and A2 might appear to indicate that the local economy is the most important aspect.  Concern about control of height of buildings. Although listed in point a) there has been building in the past which has used the fact that there are three storey buildings within the village to justify such an inappropriate setting. Instead of	Agreed  Agreed  Agreed

			<p>“complementary” might it be better to say “respect the surroundings in terms of scale...”</p>	Agreed
		P23 DAH3	Strongly agree with para 2.	
		P25	Abbots Bromley Hospital units tend to be long term residences and only two may be able to accommodate a small family.	Noted.
		P26	<p>A figure of 51 social housing units in the parish is cited. Trent and Dove had 43 units in 2019. Cottrell Close has 6 giving total of 49. To this can be added Abbots Bromley Hospital and possibly some others. Is the figure correct?</p>	Neither ESBC nor Trent and Dove have been able to provide the Parish Council with accurate figures for social housing units in the parish. The figure of 51 is the best estimate we can come up with and should be treated as a minimum number when considering the requirements of the HNA.
		P28 DEC1	Completely support DEC1 proposals for house types, also need for bungalow accommodation.	
		P29 DEC2	Should traffic implications along with noise be considered? Most businesses generate increased traffic.	Noted, but the small business units suggested in the policy generate minimal additional traffic and noise is already included as a consideration in para. 1.
		P30 DEC3	Under d) any replacement open space should be of equal size to that replaced.	This is already implicit in (d).
		P35 NGE2	Para. 1 – support water permeable driveways from environmental and aesthetic reasons.	
		P39 TIN1	The village is already stretched beyond limits by through traffic and visitor traffic. Within development plans, provision should be made for	

		P41 TIN3	<p>a visitor parking area at either end of the village incorporating electric charging points. Should be a priority for any S106 Agreement.</p> <p>Local energy schemes in principle a good thing. Could a large ground source scheme be implemented under some of the open spaces of A. B. School for community?</p>	<p>Consideration to be given to including this suggestion in the Rationale for the policy.</p> <p>A good idea worthy of consideration.</p>
8	Resident	<p>DAH1</p> <p>DAH3</p>	<p>Concerned that the community is represented by only 3 people on the NPG. Should local groups eg WI, RBL, school governors have been invited to represent the community on the group?</p> <p>Would like more buildings on the A.B. School site listed. Concerned that 1920's buildings on south side of High Street not identified as "buildings of townscape merit." They are part of the heritage and distinctive character of the village and could, like the others north of the road, be converted to flats/apartments for first time buyers and the elderly.</p> <p>DAH1 a) should read "complementary in terms of design and character."</p> <p>DAH3 should include a section on conversion of existing buildings eg the school buildings. Considers the Plan too generic in its approach and the community should be given the opportunity to identify more clearly what it would like to see on the sites to be developed.</p>	<p>Over the 6 years the NPG has existed, it has comprised of members from all sections of the community, who have all contributed to its content as well as many members of the public. The Group only reduced to 3 parish councillor members to take the plan forward once it had emerged as a draft plan adopted by the Parish Council.</p> <p>This is an opinion. The most recent ESBC Conservation Area Assessment in 2015 concluded that no further buildings were worthy of listing and the 1920's school buildings were not included as "buildings of townscape merit." Additional work independent of the NP has been carried out on these buildings</p> <p>Will consider.</p> <p>DAH3 has been deliberately kept as a generic policy.</p> <p>The viability of any development of the A.B. School site must be taken into consideration as well as the community's wishes for the site.</p> <p>No changes required.</p>



9	Resident		Fully supports NP. It addresses need for affordable housing and housing suitable for down-sizing, also policy re. AB School site. Only concern is protection of open spaces not addressed eg the field behind the village hall (Gallimore's field).	Gallimore's field is outside the settlement boundary, therefore the proposal to allow limited development of the site, in return for which, the remainder would be donated for community access, is outside the scope of the Plan, which ordinarily directs development to within the settlement boundary in DEC1 and Local Plan Policy SP8. Any such proposal would need to be judged on its merits in relation to the environmental, social and economic benefits of the scheme and determination must be made in accordance with the Plan unless material considerations indicate otherwise. Local Plan Strategic Policy32 gives protection from development to open space, outdoor sports facilities and recreation land under the requirements of that policy.
10	Resident		The original draft plan stated on p1 that <b>"At this time, the plan does not seek to identify or allocate land for development; development initiatives must be contained within the existing designated settlement boundary."</b> This has now been omitted. Why?	The statement is now on p2, but is restricted to <b>"At this time, the plan does not seek to identify or allocate land for development."</b> This was on the advice of ESBC, who advised that restricting development to within the settlement boundary without reference to the Development Plan's Strategic Policy on development outside settlement boundaries, would not be consistent with the NPPF and Local Plan and would therefore not meet the Basic Conditions. See also Policy DEC1.
11	Resident		Rejects the draft proposals. Want a full consultation regarding new housing outside the settlement boundary. Also any proposals regarding the A.B. School site and Gallimore's field should have full villager consultation.	The plan does not propose any new housing development outside the current settlement boundary. The plan's proposals are based on full public consultation over a number of years within

				the constraint of meeting the requirements of the Basic Conditions.
12	Uttoxeter Town Council		No comments to make at this stage.	
13	Resident		Has accessed early NP development plans on the website that showed many areas around the village under consideration for residential development. This information is no longer available.	We believe this is a reference to very early NPG work that has not been pursued by the current group, who have taken the view that there is sufficient space within the settlement boundary to meet the HNA recommendations.
14	Resident		Rejects the draft; it has scant regard towards protecting land outside the settlement boundary from development.  Why was a Neighbourhood Development Order or Community Right to Build not used to shape the development of the A. B. School site?  Why was a Local Green Space designation not sought to protect our most valued green spaces?	Development outside the settlement boundary is determined by Local Plan Strategic Policy 8. The NP cannot “protect” land outside the boundary from development. DEC1 directs development to within the settlement boundary unless the conditions in Local Plan Strategic Policy 8 are met. NDO or CRtBO were considered at an early stage of the plan, but were rejected because: <ul style="list-style-type: none"> <li>• Our consultant advised against them – extremely complex and take long time to prepare.</li> <li>• Neither are of any value unless the proposing body has control of the land, or, the owner is willing to cooperate with the process.</li> </ul> LGS designation was considered, but not pursued at this stage because the extra work involved would have delayed the plan. Areas for LGS may be considered for inclusion in any revision of the plan.
15	Resident		Concerned about lack of protection to “Gallimore’s Field”.	See response to (9) above.

			Insist that the A.B. School site be protected with either an NDO or CRtBO.	An NDO or CRtBO will not protect the School site from unwanted development – see response to (14) above. But if there is widespread support for either, a separate community group could be set up to progress this suggestion.
16	Resident	P30 DEC3	<p>Housing &amp; Development – firmly of the opinion that A.B. School site should be the sole resource for providing more housing for the elderly, young people and first time buyers. Numerous buildings appear suitable for conversion into apartments, sheltered accommodation and individual houses. Other buildings could be converted for local businesses or public amenities.</p> <p>Has a figure been put forward for the number of housing units required to be provided in Abbots Bromley? Will there be public consultation for residents to voice their concerns before any planning applications are considered? Will development outside the settlement boundary be refused?</p> <p>Given the size of the brownfield site offered by A.B. School, there should be no need to develop any green areas that are a valuable amenity to the village.</p>	<p>A.B. School cannot be the sole provider of development land in the parish but has the potential to meet most of the demand.</p> <p>Policy DEC3 supports a mix of uses for the site. No changes required.</p> <p>The ESBC Local Plan 2012-2031 states that Abbots Bromley should provide 40 houses.</p> <p>All planning applications submitted to ESBC are subject to public consultation.</p> <p>There is a general presumption against development outside the settlement boundary unless the application meets one of the rural exception criteria.</p> <p>The settlement boundary was extended in 2012 to provide an additional development site south of Uttoxeter Road. Unlike the extension of the boundary on Lichfield Road, this land is still available for development.</p>

			<p>Have any steps been taken to safeguard Gallimore's field as a recreational facility?</p> <p>Have any steps been taken to safeguard the Lowers and the adjoining field to the south?</p> <p>Have any steps been taken to safeguard the Anglesey?</p> <p>Support for the suggestion that a 20mph speed limit should be introduced within the village. What is the process for (a) making this happen and (b) enforcing it.</p> <p>A by-pass to the High Street has been mentioned. Where would it be routed and would it not be detrimental to the green spaces and countryside views?</p>	<p>See response to (9) above.</p> <p>Both fields fall outside the current settlement boundary. See also response to (14) above.</p> <p>This field is also outside the settlement boundary.</p> <p>These are Highways issues outside the scope of the NP.</p> <p>The NP does not mention a by-pass and in any case this would be outside the scope of the plan.</p>
17	Resident		Does not support NP because of volume and type of housing proposed; encroachment and erosion of Green Belt; mass development of AB School site.	The NP only supports housing meeting a clearly identified local need and built within the existing settlement boundary. It does not support development outside the settlement boundary, except in relation to exceptions Strategic Policies already adopted in the Local Plan. The plan proposes a mixed use for any redevelopment of the A.B. School site, with retention of existing open spaces, trees and hedges. No changes required.
18	The Coal Authority		No coal mining features within the defined NP area.	No changes required.
19	SCC Flood Risk Management	DEC3	Any development of the A.B. School site should not worsen the existing risk from surface water flooding along the High Street. Any development should be accompanied by an acceptable drainage	Agreed, but no changes required.

		NGE2	<p>strategy, details of which are laid out in full in the SCC SuDS Handbook.</p> <p>We would suggest replacing the policy wording with relevant statements from ourselves, Severn Trent and the EA. An appropriate LLFA statement would be:</p> <p><b>“Any development should be accompanied by an acceptable drainage strategy, details of which are laid out in full in the SCC SuDS Handbook.”</b></p> <p>Interpretation and Guidance</p> <p>We would suggest including our standing advice for drainage applications.</p>	<p>Noted, but this is more relevant to the LPA to consider when determining planning applications. It is not specific to Abbots Bromley and no change to the plan is required.</p>
20	Resident		<p>Lack of reference to public amenity areas (play areas, Millennium Green etc). Would be reasonable that these are recognised, and conditions included to protect their status. Might also include facilities such as Richard Clark school, Surgery, Village Hall where their value and importance should be recognised against risk of potential development.</p> <p>Only one reference to open space within the former A.B. School site, but there is potential erosion of other open spaces, both for recreation and visual amenity. Although these areas may not have right of use, their loss would significantly affect the health and wellbeing of residents. Should take a firm stance on protecting all open spaces.</p> <p>The plan should be prescriptive about what may happen to the A.B. School site. Must allow the</p>	<p>Designation of public amenity areas and certain other open spaces as LGS has been considered – see (14) above.</p> <p>These facilities cannot be protected by the Plan. The Surgery, for example, is privately owned.</p> <p>As above.</p> <p>The Plan cannot be too prescriptive; it is up to the developer to determine what is viable. The Plan</p>

			<p>community to have a say on how it is developed. Must not allow a developer to set the standard. The site is vast and will impact everyone. The net change must be of positive benefit to the community.</p> <p>During the period of the plan, we will see a massive switch to electric vehicles. Some of the village does not lend itself to home charging and the plan should recognise this and consider how it might be addressed.</p> <p>Roof top solar is evolving rapidly and becoming more aesthetic as the technology develops. Does the plan need to be more receptive here?</p> <p>Unclear what the governance is with the plan; who is the author, is it the collective PC?</p>	<p>seeks to provide a framework, based on the wishes of the community, against which any development proposal will be judged. Given the importance of the site in the village, it would be expected that any developer would engage with the community, prior to submitting a planning application.</p> <p>This is outside the scope of the NP, but can be considered separately by the Parish Council, who would be supportive. It should be noted that Policy TIN1 requires charging points be provided as part of new parking provision. The inclusion of EV charging points in most new buildings is now a requirement of Building Regulations. TIN3 supports renewable energy schemes provided there are no significant adverse impacts on nearby residential properties.</p> <p>The Plan was prepared by the NPG on behalf of the PC and formally handed over to the PC in February 2021. It has since been progressed by a group of councillors who were members of the NPG. All changes made to the plan since the first draft have been considered and approved by the full PC.</p>
21	Resident	P15 P17 P25	<p>Referring to protection of local green space and statement on p15 that “Public interest for the potential creation of a policy in relation to Local Green Space” has not been taken forward at this time”. No explanation or justification for this statement is given. This area of policy must be represented in all future drafts.</p>	<p>LGS have already been referred to in (14) above. The PC may reconsider this issue outside the NP. LGS are contentious and some landowners have made clear their opposition to the designation. The decision not to include LGS designations in the NP was taken to avoid any further delay to completion of the plan.</p>

		<p>DAH3</p> <p>DAH3 provides a degree of protection for hedges and trees but gives no protection for the grass or other vegetation of open green spaces.</p> <p>DEC1</p> <p>There is nothing in the draft plan to clarify whether development will or will not be supported outside the existing settlement boundary. Development outside the settlement boundary is largely left uncontrolled. There is no statement to clarify why or how the settlement boundary might be expanded.</p> <p>DEC2</p> <p>DEC2 states that “Development involving loss of existing community facilities will be supported only where similar or better facilities are provided elsewhere, or it can be demonstrated that such facilities are no longer needed”. “...elsewhere..” is not a tight definition and more words are needed to explain its scope or to outline mitigation that any developer causing the loss of an existing facility should implement to alleviate that loss.</p>	<p>See comment on LGS above.</p> <p>The plan contains a clear statement that it will not support development outside the settlement boundary – see (14 ) above.</p> <p>The Policy will be amended to “provided within reasonable walking distance”.</p>
22	Resident	<p>Does not support NP because of risk of developments outside settlement boundary. The HNA identified that more than 200 houses are needed in the Parish. Under new guidance in the NPPF, developers can apply for an exemption allowing both affordable and market value houses outside the settlement boundary. NP should prioritise development inside the boundary and residents given a strong say on what is delivered</p>	<p>See (14 ) above.</p>

			<p>The A.B. School site should be prioritised but in a controlled manner. The plan need considerably more detail in order for the community to shape the development .</p> <p>Would like to have seen the Parish Council obtain a NDO or CRtB so that Parish had more influence over future developments.</p>	<p>See (20) above.</p> <p>See (14) above.</p>
23	Resident		<p>Considers that the Parish is at risk of development outside the development boundary due to the housing need numbers identified and the ability of developers to apply for an exception.</p> <p>Also concerned that insufficient controls are included on development on the A.B. School site.</p> <p>Would prefer the plan to identify where development will happen and have the overall approval of the local community.</p>	<p>See (14) above.</p> <p>See (20 ) above.</p> <p>From the outset, the plan has attempted to create a vision for the growth of the village without further extending the settlement boundary in line with the wishes of the community.</p>
24	Resident		<p>Supports NP. Does not want development outside the settlement boundary. Wants affordable housing for the young and suitable housing for the elderly. Does not want more executive houses. Wants to see the village develop and public transport provided to all surrounding towns.</p>	<p>The plan covers all these issues. No changes required.</p>
25	Farming business		<p>Local Green Spaces – concerned that the Parish Council will use the NP if passed at referendum to implement LGS status on our field next to the church. The field is used for rearing young stock and does not meet the criteria for a LGS.</p>	<p>LGS are mentioned in the plan, but are not part of its proposals.</p>



			<p>Quiet Lanes – wishes to express the strength of feeling against QL creation. Considers that the recently revised Highway Code, giving non-motorised users priority, renders QL status obsolete. Erection of QL signs would fuel the strong local anti-farming sentiment.</p>	<p>Quiet Lanes are mentioned in the plan, but are not part of its proposals. No changes required.</p>
26	Resident		<p>Supports the principles proposed in the plan. There must be greater choice of housing for first homeowners or renters, for those wishing to downsize and families needing medium to large homes. There is currently a good mix, but it is not affordable to those who are local. Quality of design is important to reflect the character of the village and the need to meet climate change objectives. Considers the current draft is at the right level of detail and aspiration.</p> <p>Any sale of the A.B. School site to a developer is likely to be conditional on planning. Suggests that the PC engages with ESBC to influence proposals for the benefit of the community. Supplementary Planning Guidance should be used to apply existing policies to the site, detail the buildings to be retained and specify the housing mix. The SPG should confirm areas to be retained as open space and areas to be used for public recreation. Now is the time to press for funding of community initiatives such as facilities at the new sports ground or additional resources at the village hall.</p>	<p>The suggestions will be explored with ESBC and any future developer of the A.B. School site.</p>
27	Resident		<p>Supports the plan. Important that it is brought into force to ensure the aspirations of residents are</p>	

			<p>taken into consideration in determining planning applications. The Local Plan alone cannot be relied upon to meet the requirements of the village.</p> <p>Any delay in approving the plan could have a detrimental impact regarding development on A.B. School site.</p>	<p>No changes required.</p>
28	Resident		<p>The village requires more affordable housing for the young and bungalows and other homes suitable for older residents. Any new builds must be in keeping with the character of the village.</p> <p>There should be limits on the number of homes permitted otherwise the infrastructure will not be able to cope. The main road is not able to cope with more traffic. There is only one primary school which is at capacity for most years. There is also poor public transport; the surgery is already overloaded; there are insufficient shops, no post office or ATM, no electric charging points. Are there policies to address these issues?</p> <p>There is little mention of the A.B. School site and associated buildings, particularly the sports hall and swimming pool that have lain empty for a long time and should be brought back into use for the benefit of residents. Do not wish to see the land around the school developed.</p> <p>Need clarity on what is happening with Gallimore's field. Has there been any progress on green areas that could not be developed?</p>	<p>There is only limited land within the settlement boundary on which new housing can be built, but it is adequate to meet the housing numbers in the Local Plan.</p> <p>These are issues beyond the scope of a Neighbourhood Plan.</p> <p>See Policy DEC3.</p> <p>See response to (9) above. No changes required.</p>

29	Resident		<p>Concerned that infrastructure will be overwhelmed by any increase in the local population.</p> <p>Increasing the hard surface area by building will increase flood risk unless massive investment takes place.</p> <p>Closure of A.B. School has led to the loss of swimming and sports facilities once available to the community. These should be replaced in any future development.</p> <p>Housing development should be appropriate for first time buyers and the elderly and have adequate green space for each household.</p> <p>Development should be in keeping with the character of the village and developers not given carte-blanche to decide upon any area of development.</p> <p>Further housing means provision of schooling needs to be considered. Will any development include provision for infrastructure, schools, medical services and amenities?</p>	<p>Any increase in population due to NP Policies will be minimal.</p> <p>Severn Trent and the Environment Agency will be consulted on any planning applications and advise on this.</p> <p>Past community use of the swimming and sports facilities at A.B. School were as a gift of the school.</p> <p>Policies in the Neighbourhood Plan already cover these issues.</p> <p>These issues are outside the scope of a NP.</p> <p>No changes required.</p>
30	Resident		<p>HNA identified the need for more than 200 houses in the Parish. New guidance in the NPPF allows developments outside the boundary to be both affordable and market value. The consultation has not made clear to residents that development outside the development boundary is possible. A priority of the NP should be to ringfence the boundary and address the issue of future development within the A.B. School site.</p>	<p>This is not the case.</p> <p>The NP cannot “ringfence” the settlement boundary. See response to (9) above.</p> <p>The NP proposes a mix of uses for the School site.</p>
31	Resident		<p>Appreciates the need for a small development of affordable housing, preferably at the A.B. School</p>	<p>This is what is proposed in the plan.</p>

			site, but would not wish to see any large-scale development because of the increase in traffic.	
32	NFU	NGE  TIN	Concerned regarding the potential creation of a policy in relation to Local Green Spaces. Any inclusion of land has the potential to unduly restrict the activities of farm businesses. Concerned about the references to Quiet Lane designation. Would like to highlight the practical importance of lanes around the village as the only access to land, infrastructure and livestock. Would support any proposal to reduce the current 30mph speed limit through the village to 20mph.	The Parish Council will consult with affected landowners and the NFU should either of these policies progress further. Neither LGS or Quiet Lanes are currently being considered by the PC.
33	AB School c/o Savills	DAH1	Consider that DAH1 d) and e) contain ambiguous terminology and would benefit from further clarification: d) requires that “... <i>traditional landscape as an integral part of the design</i> ...” within public realm designated areas. Further clarity is accordingly requested on what is meant by “ <i>traditional landscape</i> ” and this should be added to the supporting text.  e) requires that the layout and form of development should respond to local features within and adjacent to sites including the “microclimate”. Neither the NPPF or Local Plan include provisions relating to what specific considerations developers are being expected to take into account when responding to microclimate. It is also noted that criterion f) requires front boundaries to be retained as part of any new	“ <i>traditional landscape</i> ” will be defined in Guidance.  For e) the Interpretation section will be enlarged to explain how development could respond to microclimate, for example, by taking account of solar gain and overheating in the orientation of properties.

		DEC1	<p>development. It is not always possible, necessary or appropriate to retain all front boundaries as part of development proposals in order to deliver effective high-quality development. There may be some instances where benefits accrue from altering, realigning, or improving boundaries. The wording should incorporate some flexibility in order for this to be achieved.</p> <p>The following amendment to criterion f) is sought: <i>“Front boundaries comprising hedges or historic brick walls or railings must be retained <u>where possible</u> as part of any new development.”</i></p> <p>Policy DEC1 a) requires that residential development must “predominantly” include the following housing mix:</p> <ul style="list-style-type: none"> <li>• smaller housing and First Homes (1-2 bed)</li> <li>• affordable homes for families (3 bed)</li> <li>• housing suitable for the elderly, with a mix of market value and social housing</li> </ul> <p>The Abbots Bromley HNA identifies a need for more 2 bed and 3 bed homes. However, the HNA considers all tenures and does not restrict the need for such homes to just being delivered as affordable housing. It is requested that “affordable” be removed from the second bullet point of DEC1 a) to avoid the use of potentially confusing terminology and because this is not justified by the evidence. DEC b) provides appropriate focus to ensure that consideration is given to the contribution that can be made by</p>	<p>For f) the wording will be altered to:</p> <p><b>“f) Front boundaries comprising hedges or historic brick walls or railings should be retained as part of any new development. New front boundary treatments should complement the existing character of the area, based on the use of low brick walls or hedges.”</b></p> <p>The wording of the second bullet point will be altered to <i>“homes affordable for young families (3-bedrooms)”</i></p>
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			<p>affordable housing to meet local needs by stating that <i>“any affordable housing provision should focus on these types of housing.”</i></p> <p>The former A.B. School has a role to play in providing a supply of homes to those in the Parish who wish to downsize or those seeking the first step on the property ladder. However, we wish to highlight that downsizing and the provision of smaller dwellings should not automatically equate to a need for 1 bed properties. 2 bed properties prove popular or even necessary to serve this purpose because they can provide more options; spaces for home working; somewhere for guests and carers to stay. The impact of the pandemic has not been addressed within the HNA. It should be recognised that the provision of 1 bed homes is also generally synonymous with apartment schemes. It is accordingly requested that the policy wording also supports the provision within new residential development of spaces within dwellings which can be used for homeworking.</p> <p>It is noted that DEC1 does not quantify the extent of local need for particular size dwellings or for particular demographic groupings. We suggest that neither the policy wording nor the supporting text seek an exact proportion of dwellings that need to be met within specific housing sizes. However, there is a need for the policy wording to make it clear that the focus of this policy is to ensure that new housing delivered in the Parish</p>	<p>On the issue of 1-2 bedroom properties, the plan mentions both, so it is flexible.</p> <p>To cover homeworking, the policy will be amended through the addition of a clause requiring housing layouts being flexible to meet changing needs, including home working. The Interpretation section will be enlarged to include reference to compliance with Nationally Described Space Standards.</p> <p>The Interpretation will be enlarged to include: <i>“the focus of this particular policy is to ensure that new housing delivered in the Parish can contribute to meeting a range of identified local needs.”</i></p>
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		DEC3	<p>can contribute to meeting a range of identified local needs.</p> <p>In regard to Affordable Housing, the HNA states that 30 households are expected to need affordable housing over the plan period and a further 59 households may require flexible routes to home ownership. The HNA suggests that the Parish Council could designate rural exception sites and community led housing to meet some of the affordable housing needs. NPs are able to allocate sites to support the provision of affordable housing, however, the Plan does not include any such proposals. Clarification is sought as to why the Parish Council has not assessed this option.</p> <p>There is a national requirement for 25% of affordable dwellings on sites to be First Homes. In order to meet the Basic Conditions, the NP should not be requiring a First Homes provision above 25% unless there is sufficient evidence to justify such an approach.</p> <p>With regard to DEC3 a) it is considered that the policy should state that <i>“The <u>built</u> development must be within the Abbots Bromley settlement boundary.”</i></p> <p>The full extent of the A.B. School site is shown on Fig.4 which clearly shows that some parts of the site extend outside of the CA and settlement boundary. Land outside the settlement boundary</p>	<p>The plan does not allocate sites for affordable housing and does not need to.</p> <p>On First Homes, the policy does not set a proportion, so there is no contradiction with Planning Practise Guidance.</p> <p>Agreed. Add “built” as suggested.</p> <p>The Interpretation of the policy will be changed to make clear that open space within development</p>
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			<p>could be used for open land uses as part of the wider development of the site to the benefit of the community. Therefore DEC3 a) should not specifically seek to preclude such development.</p> <p>With regard to DEC3 b) the opportunity for a mix of uses on the site is welcomed. It should be recognised that the majority of the development that will be delivered inside the settlement boundary is some form of housing (market / affordable / retirement living) and that any community facility / employment uses would be ancillary to this use. This responds positively to the HNA in relation to the local market and affordable housing needs.</p> <p>We consider the provision of a shop as part of the development would bring community benefits as well as employment opportunities and this should be referenced within the policy wording:</p> <p><i>“A mix of uses will be supported on the site. This may include housing that meets the requirements of Policy DEC1 and should also include the retention or replacement of community use facilities within the site, as well as the creation of new employment opportunities, which could include new retail uses where there is an identified need.”</i></p> <p>As envisaged by the NP, it is currently expected that the listed buildings and buildings of townscape merit will be retained on the site.</p>	<p>could be provided on the part of the site outside of the settlement boundary.</p> <p>The comment on development being likely to comprise residential development with ancillary employment and community facilities is noted. The policy does not specify proportions of employment and/or community facilities.</p> <p>Agreed. DEC3 para. 1b) will be reworded for this mix of uses.</p> <p>Do not agree. The listed school buildings and other buildings of townscape merit are an integral part of</p>
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		<p>However, in order to provide flexibility and ensure that DEC3 remains deliverable, we consider that “<i>where viable</i>” should be added to this criterion to account for any change in market or economic circumstances which have not been anticipated in the plan (NPPF para. 82).</p> <p>Criterion c) should be reworded as follows:</p> <p><i>“The listed school buildings and other buildings of townscape merit must be retained and refurbished as a key element of development <u>where viable</u>, thereby maintaining their contribution to the special architectural or historic interest of the conservation area.”</i></p> <p>In relation to d) the NP should support the ability for A.B. School land outside the settlement boundary to be used for the provision of public open space and/or other generally “open” land uses. The land within the settlement boundary should be the focus for built development. The ability for some of the existing <u>private</u> open space within the settlement boundary to be developed as part of future development proposals with an opportunity to deliver compensatory open space outside the settlement boundary, if required, is welcome.</p> <p>The former A.B. School land outside of the settlement boundary is predominantly not publicly accessible. If it is to be used in the future for the provision of public open space, then it would have</p>	<p>the Abbots Bromley Conservation Area and the policy should not be weakened to allow a developer to demolish the buildings in order to maximise their profit from the site</p> <p>No change.</p> <p>Agreed.</p>
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			<p>significant benefits for the residents of Abbots Bromley.</p> <p>Criterion e) states that trees and hedges must be retained as part of the development. This requirement is unnecessarily restrictive, at odds with national policy and inconsistent with proposed policy DAH3. It is not considered to be comply with the Basic Conditions.</p> <p>NPPF para. 131 requires that existing trees should be retained “wherever possible”. Only veteran trees and ancient woodland are afforded greater protection in the NPPF and “wholly exceptional reasons” are required to justify their removal.</p> <p>ESBC Detailed Policy 8 identifies that development proposals where there are existing trees of value on site must be designed to “retain as many existing trees and other natural features as possible...” where tree removals are exceptionally agreed, a greater number of replacements will be expected...” A similar approach is taken with the proposed NP Policy DAH3.</p> <p>It is expected that a tree survey will be undertaken as part of any development proposal to categorise the trees and identify if there are any trees worthy of protection under NPPF para. 180. Some trees and hedges may require removal as part of the development in order to achieve the most appropriate development proposal within the</p>	<p>The Interpretation section of this policy will be supplemented by reference to the need for a tree survey.</p>
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			<p>settlement boundary and make the most effective use of land (NPPF section 11).</p> <p>It is considered that criterion e) should be reworded as follows:</p> <p><i>“Trees and hedges should be retained wherever possible as part of the development. Where the removal of trees or hedges is justified, replacement planting must be provided to create a similar or better level of amenity.”</i></p> <p>It is noted that page 26 of the plan refers to A.B. School site being Policy DEC4. It should be amended to DEC3.</p>	<p>Not agreed, but e) will be reworded.</p> <p>Agreed. This is an error.</p>
		NGE1	<p>We question whether this policy adds anything to the national requirements for biodiversity net gain and the protection of ecological assets within ESBC LP Strategic Policy 29 (Biodiversity and Geodiversity).</p>	<p>Agree. The policy as drafted adds little to national or local requirements. Instead, it will be made locally specific:</p>
		NGE2	<p>We consider that “where possible and practicable” should be added to this policy. This is because schemes already need to demonstrate use of SuDS and features to comply with Local Plan Strategic Policy 27 (Climate Change, Water Body management and Flooding). Also where hard surfaces within the development will be adopted, there may be certain design/surfacing requirements that will need to be met.</p>	<p><b>1. New development must have no significant adverse impact on the open rural landscape of the parish and its wildlife and ecology. In particular, this includes consideration of impacts on the following natural features:</b></p> <p><b>a) The landscape setting of Abbots Bromley village.</b></p> <p><b>b) The River Blithe and its setting.</b></p> <p><b>c) Other watercourses.</b></p> <p><b>d) Blithfield Reservoir and its setting and local ponds.</b></p>

		<p>TIN1</p>	<p>Point 1 of TIN1 states that development which is likely to generate additional journeys must include a “<i>balanced provision of transport and parking options.</i>” Further clarity is requested.</p> <p>Point 3 of TIN1 requires electrical charging points to be provided as part of new parking provision. We consider that the wording of this policy should allow flexibility for developers to provide the infrastructure without the specific charging point. This allows purchasers of dwellings to choose what charging point they want to meet their needs and also complies with ESBC’s Parking Standards SPD September 2020. The policy also needs to state that the requirement is for one charging point per dwelling with associated parking and not per parking space in accordance with national requirements.</p> <p>It is not clear whether Point 4 of TIN1 requires the provision of secure cycle / scooter storage over and above any storage that would otherwise be</p>	<p>e) Bagot Wood ancient woodland and its setting, including Bagots Park.  f) Duckley Wood plantation.  g) Other woods, trees and hedges.  h) The Clump.  i) Staffordshire Way and other footpaths and bridleways.  k) any similar sites or features.</p> <p>This can be made clear in the Interpretation to the policy by stating that a balanced range would include facilities to support active travel (cycling and walking). A transport assessment could also be referenced in the Interpretation.</p> <p>To allow flexibility for developers and comply with national standards, TIN1 para.3 will be amended to:</p> <p><b>3. Power supply points to charge electric vehicles must be provided as part of new parking provision, with one point per dwelling with associated parking.</b></p>
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			provided to serve new dwellings. We do not consider it is appropriate for all cycle storage to provide electrical charging points given this is not a national or local requirement and has not been explored through the NP evidence base.	Agreed. The requirement for electrical charging points for cycle storage will be removed from para. 4 of TIN1.
34	Resident		“The plan appears to have been a thorough analysis by people committed to the welfare of the community.” The consultee goes on to raise three highway related issues around the village.	Highway issues are outside the scope of the NP but can be raised by the Parish Council with the appropriate authority.
35	Severn Trent	NGE2	<p>Support the Drainage and Flooding policy but feel it could go further by referring to the drainage hierarchy: <i>“New developments shall demonstrate that all surface water discharges have been carried out in accordance with the principles laid out within the drainage hierarchy, whereby a discharge to the public sewerage system is avoided where possible.”</i></p> <p>The policy should also refer to Sustainable Drainage Systems (SuDS): <i>“All major developments shall ensure that SuDS for the management of surface water run-off are included, unless proved to be inappropriate.”</i></p> <p>The policy should refer to Blue Green Infrastructure: <i>“Development should where possible create and enhance blue green corridors to protect watercourses and their associated habitats from harm.”</i></p> <p>The policy should refer to Green Open Spaces in relation to flooding: <i>“Development of flood resilience schemes within local green spaces will be supported provided the</i></p>	These points are already covered by ESBC Local Plan Strategic Policy 27.

			<i>schemes do not adversely impact the primary function of the green space."</i>	
36	Resident		"I support the plan as drafted"	
37	Resident		"Please submit my approval"	
38	Resident		Supports the plan – development should be smaller homes whilst not overburdening the village's limited infrastructure.	
39	Resident		Supports more smaller affordable housing for younger generation and bungalows for the elderly. If A.B. School does not reopen as a school would support conversion to apartments.	
40	National Grid		A 400kv overhead electricity transmission line crosses the parish to the north and a gas transmission pipeline to the south.	Noted.
41	NFU	NGE TIN	Request early consultation should Local Green Space policy be taken forward. Request early consultation on Quiet Lanes should any lanes be proposed for this designation.	Both points noted.
42	Resident		"...hugely impressed with the content..."	
43	Staffordshire County Council	NGE1	<b>Ecology</b> Concern that the supporting text on p31 presents flooding as a cause for concern. Natural flood management methods are now generally preferred and allowing flood plains to flood is an important part of this strategy. There are a number of tributary streams in the parish that form headwaters which can be important in providing refuges for wildlife. Policy NGE1 refers to a range of habitats, however there are a number of Local Wildlife Sites in the parish that are designated for their species-rich grassland and this habitat should also be noted.	Noted and the Rationale will be amended.

			<p>The second part of NGE1 refers to biodiversity net gain. This is usually taken to refer to habitats and damage or loss to habitats is not mitigated by provision of wildlife structures such as bird boxes. These are generally referred to as enhancements. It is suggested that the policy is slightly altered to reflect this:</p> <p><i>“2. Development should provide biodiversity net gain, so that any habitat lost or damaged is adequately mitigated with additional habitat also being provided.</i></p> <p><i>3. Features to support wildlife and nature are encouraged, such as bat bricks; bird and owl boxes and hedgehog runs.”</i></p> <p>It may be helpful in supporting text that “habitats” in net biodiversity gain terms refers to almost all habitats except for hard surfaces. This means that loss of part of an arable field or garden still needs to be mitigated or compensated for in some way.</p> <p>Reference to tree protection in the policy is welcome. Veteran trees are important in the Parish both within parkland and in hedge lines; this could be specifically mentioned in the supporting text. It is also worth noting that near veteran / old mature trees should also be conserved to provide continuity in terms of landscape and as dead wood habitat for specialist invertebrates.</p> <p>There are records of native Black Poplar on the southwest edge of the Parish and some planting of</p>	<p>These points are noted and the policy will be amended.</p> <p>“Habitats” in biodiversity net gain terms can be defined in the Interpretation section of NGE1.</p> <p>The value of veteran / mature trees will be referenced in the Interpretation section.</p>
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		<p>this species / survey work to check trees that might be native Black Poplar could be helpful.</p> <p><b>Archaeology / Historic Environment</b>  The focus of the plan from a historic environment point of view is very much on the heritage assets and its built heritage and does not discuss in any detail the historic character of the wider parish landscape, nor does it consider any archaeological interests. The plan could be enhanced by providing more context for the built heritage and including similar information on non-designated heritage assets within the wider landscape. This could be achieved by directing users of the plan to the Staffordshire Historic Environment Record and also the Abbots Bromley Historic Character Assessment report, both available online. Consideration could be given to the inclusion of a map providing information on non-designated heritage assets within the settlement and wider parish.</p> <p>The NP may also benefit from including an additional policy to take account of the potential for the survival of above and below ground archaeology across the parish. The plan could reference Section 16 of the NPPF and Detailed Policies 5 and 6 in the ESBC Local Plan which identify various aspects of the historic environment as a material consideration within the planning system.</p> <p>Farmsteads outside the settlement of Abbots Bromley contribute to the overall historic character of the parish landscape and face</p>	<p>These can be referred to under Rationale and Evidence for DAH1.</p> <p>This issue could be covered by adding to the Interpretation section.</p>
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		<p>DAH1 DEC2</p>	<p>increasing pressure due to diversification of farming and the demand for rural housing. SCC and Historic England have produced guidance on conserving the farmsteads including design advice; a framework to facilitate long term conservation and the sensitive conversion of historic farm buildings. Consideration could be given to making reference to this guidance in the relevant built environment policies DAH1 and DEC2. The Staffordshire Historic Farmsteads Guidance and associated documents are available online.</p> <p><b>Public Rights of Way</b> The plan should encourage developers to enhance the existing path network where possible in line with SCC's Rights of Way Improvement Plan. This could include:</p> <ul style="list-style-type: none"> <li>• the creation of bridleways or upgrading footpaths to bridleways to improve the provision for horse riders and cyclists.</li> <li>• the creation and promotion of short circular walks to promote the health benefits of walking.</li> <li>• the replacement of stiles with gaps (where no stock) or gates (where there are) in line with SCC's Least Restrictive Principle for path furniture.</li> </ul> <p>SCC is able to provide further advice and guidance as and when required.</p> <p><b>Transport</b></p>	<p>This is covered by ESBC Local Plan.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p>
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		TIN1	In relation to Policy TIN1, whilst it is broadly supportive of sustainable transport and includes mention of cycle storage and parking, point 2 should also make reference to supporting the ease of movement of cyclists, not just pedestrians. Point 1 could also make reference to car trips as opposed to additional journeys with no specified mode.	“cyclists” will be added to para. 2 of the Policy.  Para. 1 will be amended.
		TIN4	<b>Digital Connectivity</b> It is noted that reference is made to suitable broadband and digital communication networks. This refers to “High Speed Broadband”. As internet traffic increases, the current limitations of digital connectivity will cease to be fit for purpose within 10 years and there will be a need to move on to “Gigabit Broadband” that can provide speeds of over 1000 megabits per second, generally provided by full fibre connections. During the plan period, building regulations may change to require all new builds to have gigabit connectivity.	The Interpretation section can be extended to cover this.
44	Residents combined response		It would have been helpful if Draft 4 had an appendix or guide to direct the reader to areas where it is different from the previous Draft 3.  It is noted that Draft 4 now covers only a nine-year period 2022-2031, much less than the more usual 15 year period for a NP.	The NP has evolved through a series of drafts following input from councillors, ESBC and the Parish Council’s consultant. Draft 4 is the Consultation Draft for the purposes of Reg 14 and reference to any earlier version is irrelevant. The suggested appendix would be confusing and is unnecessary.  A change to the timing of the plan to 10 or 15 years could be considered, but in reality a review of the Local Plan is likely before 2031 necessitating a review of the NP. No change.

		DAH2	DAH2-Extensions has been cut down substantially in the latest draft.	This was on the advice of ESBC. No change.
		DAH3	DAH3-Conservation Area. This Policy has been cut down compared with the earlier draft and would seem to be a weaker policy in terms of the protection of existing trees and hedges.	The latest version of the policy sets clearer requirements. No change.
		DEC1	DEC1 – Residential Development. Could you explain what is meant by “functional garden space”. “What is or isn’t a functional garden might be different in the village core to the more rural parts of the parish. It is hard to see how this policy can be enforced.”	Functional garden space is already described in the Interpretation section of the policy. It was mentioned because otherwise developers could miss out garden space altogether. Consideration will be given to amending DAH1 a) to including “garden spaces” as one of the factors to be considered.
		DEC3	DEC3 – Former A.B. School Site. It is noted that f) and g) in the former draft have been removed. It would seem that the policy is weaker as a result.	DEC3 f) in the previous draft of the plan did not make sense in planning terms and g) was vague. Neither met the Basic Conditions and so were removed. It would be possible to provide a more detailed policy and/or guidance on the school site to strengthen the plan, but this could have implications for repeating the Reg 14 consultation.
		Appendix 1	Appendix 1 – Buildings of Townscape Merit. Given the information exists elsewhere, for example in the village Conservation Guide, it is unclear why it is deemed necessary.	Buildings of Townscape Merit are depicted on the maps on p9 and p10 of the plan. ESBC requested the addition of an appendix giving further details on the buildings.
45	Natural England		No specific comments on NP	

46	ESBC	<p>DAH1(g)</p> <p>P26</p> <p>P28 DEC1</p>	<p>The draft plan seems well prepared and demonstrates community engagement over a number of years. However, it would be useful to arrange a session with the community or an FAQ to explain the NP journey so far and what the plan is aiming to achieve.</p> <p>ESBC believes the NP would not have significant environmental effects and an SEA is not required.</p> <p>It would be helpful if the interpretation and guidance section of this policy could give some examples of “features and materials which actively reduce the impact of carbon emissions”, which new buildings could include.</p> <p>Should the first paragraph read “warden assisted housing”?</p> <p>Bullet point “conditions apply to this policy for a NP to over-rule conflicting development intentions” is unclear. Can this be reworded? This policy does not address development on exception sites and/or outside the settlement boundary. For these applications Local Plan policy/NPPF will apply. Should the NP requirements for housing type/size also apply to these developments? This could be included by adding the following text in italics: “1. Residential development will be supported within the</p>	<p>Drop-in sessions held during the Reg 14 process have already identified some uncertainty in the community about the aims of the plan, possibly due to the length of time the plan has been in preparation and delays due to Covid. Further community engagement is planned in the period leading up to the referendum.</p> <p>Examples of “green design” will be added to the Interpretation section: Use of heat pumps and solar panels; “A” rated energy usage; the use of sustainable and locally sourced materials wherever possible.</p> <p>Agreed. Change “warden-controlled” to “warden assisted housing”.</p> <p>The 5<sup>th</sup> bullet point on p26 will be deleted.</p> <p>The first paragraph of DEC1 will be amended to: “Residential development will be supported within the settlement boundary, or otherwise in accordance with the development plan, subject Local Plan Policy SP8”.</p>
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			settlement boundary, or otherwise in accordance with the development plan, subject to:"	
		P29 DEC2	Suggest removal of "(such as the provision of small office units and small rural craft units)" from 1. As this element of the policy may inadvertently prevent other acceptable local employment types.	Change the content of the brackets to "(Use Class E)" and add to the Interpretation and Guidance section: "In the context of DEC2 para. 1, Use Class E would include small office units, rural craft units and artisan retail units."
		P29 DEC2	Suggest replace "provided elsewhere" with "provided within reasonable walking or other active travel distance"	"provided elsewhere" will be replaced with "within reasonable walking distance".
		P30 DEC3	We have concerns that DEC3 may inadvertently lead to the refusal of a high-quality scheme which utilises land outside the settlement boundary by being overly restrictive. It is clear from Fig. 4 on p10 that a good deal of the school site lies outside of the settlement boundary. The policy might prevent recreational, or community use buildings being built near land they serve, or land swaps and re-provision within the site are taking place. An alternative wording might include "1. <i>New housing and employment development as part of the scheme must be within the Abbots Bromley settlement boundary.</i> " Potential developers of this site may challenge this policy on viability grounds during the NP examination. The Parish should be ready to demonstrate that in developing the plan it has considered economic viability.	Agreed.  DEC3 para 1a) will be redrafted to "New housing and employment development as part of the scheme must be within the Abbots Bromley settlement boundary, but open space associated with the scheme could be outside the boundary."

		<p>P34 NGE1</p>	<p>An alternative approach would be to re-write this policy as a mixed use allocation of the site as a whole, specifying a quantum of development and giving more control over layout, however, this would come with additional evidence base requirements.</p> <p>Should the supporting text to DEC3 also include a request for any masterplan for the site to be developed in consultation with the Parish?</p> <p>NGE1 Interpretation and Guidance requires that a “comprehensive impact statement must be produced”. Is this a policy requirement? If so it should be included in NGE1. Is this a requirement for all development or just major development? What would an impact statement include? This should be detailed.</p> <p>Alternatively, this requirement could be removed from NGE1 as it is likely to be covered by existing application requirements at ESBC for environmentally sensitive development. These cover the biodiversity and landscape requirements set out in the NPPF will be extended to include the provisions of the 2021 Environment Act when secondary legislation comes into force.</p>	<p>Not following this approach, as it would cause further delay to the plan.</p> <p>Agreed. The Interpretation and Guidance section will be extended to include: “Because of the importance of the School site to the village, any masterplan for the site should be developed in conjunction with the community”.</p> <p>The 2nd paragraph of the Interpretation and Guidance section will be deleted and replaced with: “Planning applications should contain sufficient information to demonstrate compliance with the policy.”</p>
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## 5. Timeline for production of Plan

2015 August	PC applies to ESBC to designate Abbots Bromley parish a Neighbourhood Area (NA)
2015 October	ESBC approves NA designation
2015 Nov/Dec	Neighbourhood Plan Group (NPG) established
2016 Q1	Initial engagement to establish community's views on improvements/changes they would like
2016 Q2 + Q3	Development of "Vision" and "Aims" for the Neighbourhood Area
2018 July	Following failure of first NPG to produce a plan acceptable to public, second group established
2018 December	First public meeting of new NPG
2019 February	Public session on Traffic and Parking
2019 March	Public session on Heritage and Conservation
2019 April	Young people's forum
2019 May	Public session on Housing Need
2019 June	Public review of progress and consideration of next steps
2019 Q3	Parish wide questionnaire to determine Policy headings and HNA completed
2019 Q4 – 2020 Q1	Initial drafting of Policies
2020 Q2	Delay due to Covid regulations

2020 Q3 – Q4	Drafting and editing of Plan by NPG Secretary in conjunction with NPG Chair
2021 Q1 – Q2	Draft plan presented to PC for comment followed by amendments
2021 Q3	Final version of HNA received
2021 Q3 – Q4	Further amendments following comments received from consultant and ESBC
2022 Q1	Regulation 14 consultation
2022 Q2	Draft plan amended following Reg 14 responses
2022 Q3	NPIERS review of draft and further refinement of Plan
2022 October	Adoption of Plan by Abbots Bromley PC and submission to ESBC (projected)
2022 Q4	Regulation 16 consultation by ESBC and independent examination of Plan (projected)
2023 Q1	Consideration of examiner's report, local referendum and adoption of Plan (projected)



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