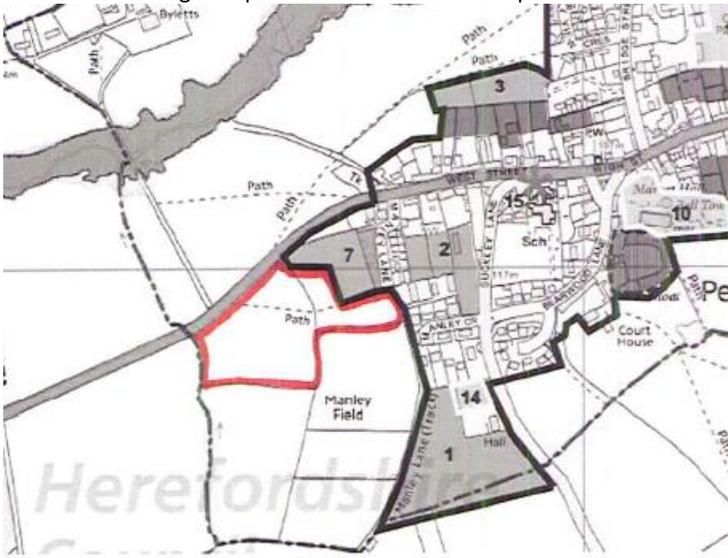


Pembridge Neighbourhood Development Plan

Schedules of Representations in response to Draft Plan, October 2017

Schedule 1: Community Representations and Response

| Respondent Identification Number | Section/ Policy Number | Support/ Object/ Comment/Recommend change/etc. | Suggested Changes Parish Council Consideration (In blue) | Proposed Change Number |
|---|------------------------|--|--|------------------------|
| C.1 J and H Henman | Housing section | Comment | <p>Pembridge already has shops, pubs, a village school with capacity for more children, a bus service and various other amenities which make it more suitable for additional housing. We would prefer to see this additional housing as small-scale developments preferably set back from the main road for three main reasons:</p> <ol style="list-style-type: none"> 1. Large scale developments on the edge of villages such as that in Shobdon make a village unbalanced. 2. Generally speaking, small scale developments are more in keeping with how a village would have grown historically and show more diversity of design & appearance. 3. The traffic on the main road through Pembridge can be extremely noisy and intrusive even on a Sunday. <p>Developments that abuts the playing field would increase use of the playing field which is currently a grossly underused resource and would provide access without the need to cross the A44.</p> <p>The sites advocated are reasonably small and medium in size. Their locations are spread across the village in order to reduce the effect on the local highway network to which they must have access. The ability to develop sites adjacent to the Millennium Meadow (presume this is what is referred to as the playing field) is restricted through lack of suitable access.</p> | No change proposed |
| C.2 D Hepworth | Housing section | Comment | <p>As someone that lives locally and is connected to a former senior member of the Primary School team, I would welcome development in the village to further utilise what is an Outstanding School, that has suffered from low pupil numbers pro rata to its capacity, despite significant investments to provide a first class school site. Small scale developments would be ideal, although in time, appropriate larger developments with social obligations would also be welcome, but lessons should be learned vis a vie that on the outcomes of the major developments in Canon Pyon and Kingsland and how they impact the villages over time.</p> <p>Noted – a mixture of small and medium sized sites is proposed which would appear to reflect this representation.</p> | No change proposed |
| C.3 R Hollis Head Teacher Pembridge Primary School | Whole Plan | Comment | <p>A comprehensive and forward-thinking document.</p> <p>Noted</p> | No change proposed |
| | Para 2.5 | Suggest change | <p>As each year is different suggest 'It currently has a roll of 85 children' is changed to 'Numbers on roll fluctuate between 80 and 95'. Catchment schools don't, now, really exist. The Government prefer 'nearest school so suggest 'The catchment school for secondary education is Lady Hawkins in Kington' is changed to 'Children have many secondary schools to choose from including those at Kington and Weobley with Hereford Cathedral and Lucton schools as popular fee-paying choices.'</p> <p>Helpful advice</p> | See change No 5 |
| | Para 3.17 | Suggest change | <p>Suggest 'The village primary school has a declining roll and support is needed towards efforts aimed at attracting more pupils; this might include enabling the further development of pre-school facilities' to 'The village primary school has a fluctuating roll but with spare capacity. Attracting more pupils from within the village will enable the school to withstand financial constraints when numbers on roll are small (i.e. below 105). Enabling the further development of daily pre-school facilities, wrap-around care and holiday club provision will enrich the lives of current families and those who wish to have the opportunity of living here.'</p> <p>Helpful advice</p> | See change No 10 |

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| | Para 4.3.10: | Suggest change | Suggest change to 'To give high priority to the retention and support of businesses/organisations that provide important community services such as public houses, shops, catering establishments and the village primary school.' I believe the words primary school need to be firmly embedded in the plan as it is a significant attraction for families wanting to live in the village. Helpful advice | See change No 15 |
| | Para 4.3.13 | Suggest change | Suggest change to 'To seek improved access to services and facilities for all ages of the community, particularly child-care, health and social care.' Helpful advice | See change No 16 |
| | Policy PEM1c) | Suggest change | Suggest addition: '...to strengthen community cohesion and improve health, education and wellbeing for new and existing residents.' Helpful advice | See change No 17 |
| | Para 7.1 | Suggest change | Suggest additional sentence: 'There is a significant need for a purpose-built pre-school building to be situated at the village school to enable increased daily use by families who would seek to live in the intended housing.' Helpful advice | See change No 29 |
| C.4 McCartneys on behalf of R. Williams | Housing Section | Suggest change | <p>Include land lying to the west of the village for possible residential development.</p>  <p>The plan already makes provision to exceed the required level of proportional growth. This site would extend the village unnecessarily in a linear and ribbon fashion in a manner that is unsympathetic to its current form and character, and in</p> | No change proposed |

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| | | | a particularly prominent location. Unless and until the adjacent site to the east is developed this site would not appear sufficiently adjacent to the built-up area of the settlement. Its future might be reviewed at such a time as the NDP is reviewed and in association with other potential sites. | |
| C.5 Border Oak | Whole Plan | Comment | Very impressed by the unique direction proposed by the Pembridge NDP draft. Assessing and including a diverse range of smaller potential development sites across the village will not only reflect the organic heritage pattern of development but should also improve/secure delivery, mitigate adverse impacts, spread the financial gain to landowners and allow easier integration within the community. An approach that supports small scale development schemes on separate sites whilst focusing on good, individual architecture, high levels of sustainability, social, ecological and visual integration and actively meeting housing needs but yet attempts to minimise potential negative impact is also commendable. We can see that PNDP has been written to enable the sympathetic delivery of a wide range of housing opportunities and to support rural enterprise whilst protecting and enhancing the surrounding landscape, heritage setting and community infrastructure. Noted | No change proposed |
| | Whole plan | Suggest change | The supporting text of the plan is quite long and detailed and may obscure or detract from the actual policies and criteria. Is there a way to create appendix or to collate the supporting text elsewhere so that the policies and maps are more prominent? If the policies could be more clearly ordered it would make the document easier to use. The NDP has to meet the needs of a range of audiences – local residents, parish councillors, developers, planning officers and committee members, and various agencies. The current document contains not just the policies that need to be complied with but also a significant amount of evidence and justification for matters covered in the plan. This will also assist the Examiner appointed to determine whether the plan meets the basic conditions. Some of the content can help its interpretation. This is the only comment received upon the amount of content so it may be assumed that most of those consulted are happy with its length. | OPTIONS 1. No change 2. Reduce length by cutting back content. 3. List the policies either at the beginning or end of the NDP |
| | Policy PEM4 i) and vi). | Suggest change | The two larger allocations (by the farm shop and by the village hall) which seem to have very few guidelines, expectations or criteria framework - as they are very prominent sites it would be fundamental to outline the expectations for these sites more clearly at this early stage in order to avoid unwanted or undesirable development, in order to secure community benefits and to mitigate adverse impacts and to also avoid resistance to the plan based upon misconceptions. We feel that these two schemes could have potential for negative impact upon the village if the criteria and guidelines are too vague. It seems sensible to offer the same level of protection as the other site allocations which appear to have more prescriptive expectations. Perhaps an explicit list of the potential concerns and how these might be overcome, along with maximum unit numbers and landscaping suggestions would help landowners/developers. But it may also be worth looking at stating more detailed housing types/mix and identifying specific opportunities for enhancement such as new footpaths, traffic mitigation contributions, integrated work units, additional village hall parking, contributions to village open spaces, bus stops, bike racks etc? | No change proposed |

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| | | | <p>The Steering Group initially sought to include more detailed for each of the sites it proposed for housing development but after further thought felt that this would be too prescriptive. All sites must comply with every relevant policy within the NDP notwithstanding the added detail for each site set out in supporting statements which cover what are considered the most important requirements. This does not suggest that other matters covered by policies within the plan should not be addressed. Detailed design elements for all sites are covered, especially through policies PEM6 and PEM20; housing mix is covered through policy PEM5; highways and footpath matters through policies PEM24, PEM25 and PEM26; and contributions to village facilities through policy PEM17.</p> | |
| | Policy PEM17 | Suggest change | <p>By encouraging small scale schemes (which we feel is the correct approach for Pembridge) and avoiding large estate like allocations you may have inadvertently promoted an environment for 'phased' development - which might then be able to avoid section 106 contributions and social housing obligations. Perhaps a policy outlining that phased developments will be eligible for contributions/obligations once the combined threshold of dwellings is reached (regardless of individual applications) together with a maximum total of dwellings for the overall area would help offer certainty. This would reflect current Herefordshire Council objectives.</p> <p>Planning Practice guidance on the pooling of funds through planning obligations is as follows:</p> <p>'What are tariff-style contributions? Some authorities seek planning obligations contributions to pooled funding 'pots' intended to provide common types of infrastructure for the wider area.</p> <p>Planning obligations mitigate the impact of development which benefits local communities and supports the provision of local infrastructure. In applying the planning obligations local planning authorities must ensure that these meet the three tests that are set out as statutory tests in the <u>Community Infrastructure Levy Regulations 2010</u> and as policy tests in the <u>National Planning Policy Framework</u>. These are: that they are necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind. For sites where the threshold applies, planning obligations should not be sought to contribute to pooled funding 'pots' intended to fund the provision of general infrastructure in the wider area. Paragraph: 014 Reference ID: 23b-014-20160519 (Revision date: 19 05 2016)</p> <p>Can planning obligations be pooled where the threshold does apply? For sites where the threshold applies, planning obligations should not be sought to contribute to pooled funding 'pots' intended to fund the provision of general infrastructure in the wider area. Paragraph: 015 Reference ID: 23b-015-20160519 (Revision date: 19 05 2016)</p> <p>From the reading of this, and in particular the second guidance statement, it is understood that you cannot seeks funds towards any pooled funding pot from sites providing 10 dwellings or less. With regard to sites where there may be more than 10 dwellings but these might come forward in phases, it is understood that as allocations the whole of the site will be considered and planning obligation payments will be required.</p> | change proposed |

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| | Policies PEM6 and PEM20 | Suggest change | <p>We welcome your focus upon good design and the supporting guidance on how this may be achieved - including the use of vernacular forms, detailing and materials (in both traditional and contemporary design). Given Pembridge's unique architectural/heritage circumstance we feel this is of fundamental significance. As a specific request we would like to ask that the Pembridge NDP clearly acknowledges the importance of authentic green oak framing (mortice and tenon jointed structural frames) to ensure that pastiche copies of the vernacular cannot take hold. We have noticed that more and more villages in Herefordshire are being characterised by 'stick on' faux framing, non-vernacular framing forms and artificial materials and we are concerned that the proliferation of fake oak framing will erode the special essence of the oak framed villages going forward.</p> <p>The use of fake or false design features and artificial materials such as mock-timber framing and upvc replacement for timber elements are rarely successful in achieving the quality necessary to preserve or enhance the character and appearance of the Conservation Area, especially for development in the most sensitive areas of the village. However, it may be considered unreasonable to specify a particular form of construction, especially in a policy. The general issue may however be highlighted.</p> | See change Nos 35 and 36 |
| | Policy PEM24 | Suggest change | <p>It is important that large scale commercial enterprise changes and growth around Pembridge do not increase the HGV and agricultural movements on the A44 - from a health, safety and heritage perspective the situation is already difficult. Support for a bypass could be clearly stated in the PNDP should an opportunity miraculously appear!</p> <p>The need for a bypass is referred to in both Policy PEM24 and paragraph 9.2. It is not possible to define any route in this plan as there is no infrastructure project for this at present. However, the need for a bypass may usefully be emphasised further as a consequence of growth both within the parish and area more generally.</p> | See change No 38 |
| C.6 B Rose | Housing section | Comment | <p>Self-building plots at reasonable prices for locals/parishioners to have an opportunity to remain in the locale.</p> <p>Noted – it is not possible to be that specific in relation to the way each site is developed although one of the reasons for the emphasis on small sites is to promote self-build.</p> | No change proposed |
| C.7 A Prior Cooper | Policies PEM6 and PEM7 | Comment | <p>Agree the quality of building should be carefully considered so it blends with the village but need to consider the housing needs of young people and young families. With the identification of building land these plots must not end up all being faux. timber houses for the better off and retired. Timber framed houses may not be so 'green' when you discover that the timbers are not a local product but come from abroad. National statistics show an ever-increasing number of people living on their own across the whole age spectrum and this should be considered when thinking of housing in the village.</p> <p>Policy PEM6 seeks designs that contain a range of forms, features and materials provided they fit sensitively into the character and appearance of the village.</p> | No change proposed |
| | Policy PEM10 | Comment | <p>Note equine enterprises have been included as part of the rural economic community. Large vehicles do not make it a safe environment for horses and the heavy traffic increases the risk of accidents. You can't encourage the rural idyll on the one hand whilst industrial farming on the other.</p> <p>The NDP seeks to acknowledge a working countryside not a rural idyll, but one that can be accommodated sensitively in all respects.</p> | No change proposed |
| | Policy PEM11 | Comment | <p>Should be no more chicken houses in the rural area of Pembridge. Has noticed a huge increase in large vehicles on the lanes around Bearwood. These are not just from the poultry industry but also larger agricultural vehicles. Note rivers in the Parish are not in a healthy state and wonder if this is to do with bad practice in the disposal of waste from poultry houses</p> | No change proposed |

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| | | | and the use of chemicals on land. Th NDP should try to have the parish in a healthy state for future generations. Appears we are in danger of destroying the essence of rural Herefordshire living. The NDP is required to plan positively for growth and as a consequence has set out conditions that must be met for many forms of development, including intensive livestock units. One of the criterion is that the highway network should be suitable, and the effects of traffic on amenity should be taken into account by planning officers not just the capacity of the highway. The NDP has tried to take into account the effects of diffuse pollution on the local rivers yet it remains to be seen whether Herefordshire Council consider this to be a planning issue. | |
| | General | Comment | Hope the sewerage system is capable of coping with the extra houses before permission is granted. Although lucky to have shops in the village they seem to be part of the tourist trade. Note the empty garage on the A44 is not mentioned as a possible development site. This could be considered as something that would benefit the village by being developed instead of left empty. Am impressed with Eardisland Shop and Pembridge could do more to enhance the community feel of the village. If development took place around the village hall it would be a good idea to utilise this asset and develop it into more of a community centre. Welsh Water has confirmed it should be able to accommodate the level of growth proposed although it may be necessary to phase development and Policy PEM22 (as amended to meet the requirements of DC/WW) provides for this contingency. | See change No 37 |
| C.8 C Basham | Para 3.10 | Comment | There are/will be families/individuals who do not meet the criteria for affordable housing and the omission of any review or acknowledgement of a need for social housing is an exclusion of part of the population. There is a need for 1-bedroom accommodation. This paragraph simply records the views expressed by residents answering a questionnaire. Other evidence was also used to determine the approach to housing needs which is set out in section 5 of the NDP and in particular policies PEM5 and PEM7. | No change proposed |
| | Para 3.29 | Comment | Sustainable modes of travel to school – refer back to the comments made i.e. the infrastructure in 3.28 and 3.27 The plan should be read as a whole. This section identifies local issues that it is hoped the NDP might address. However, there are matters that either the NDP cannot cover or the resources are not there to include during the plan period. However, there is an enabling policy should the situation change (Policy PEM24). | No change proposed |
| | Policy PEM3 and para 5.9 | Comment | It feels vital that this policy statement is upheld. The importance of drainage both grey water and sewage, will be majorly impacted by both domestic and industrial development. Heavy flooding already occurs in non-designated flood risk areas. Noted | No change proposed |
| | Whole Plan | Comment | Pembridge’s historical importance as a medieval village is recognised but it has and continues to evolve. The use of this terminology as a major description in the document can carry a sense of defensiveness to future evolution and willingness to welcome such developments. In focussing on the breadth of historical aspects of the parish it is possible to lose site of some key elements essential to maintaining the important and vital aspects of Pembridge’s history in integrating proposed developments and growth of the village and community alongside the maintenance of the historical buildings and aspects of the village. The historical aspects are vital as many of the village businesses rely on passing and residential trade and it is important to the community to maintain these but this aspect should not dominate. The NDP will help to ensure that Pembridge continues to thrive as a community, that maintains among other facilities, a nursery and primary school, and | No change proposed |

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| | | | not become a retirement or commuter village. It ensures that places such as the village hall can serve as a community hub, offering varied activities and events. The NDP seeks to address the matter building design through policies PEM6 and PEM20. It does not necessarily resist innovative design but this should be such as to fit sensitively into the village (PEM6-f). the plan provides for development that will enhance existing facilities or enable new ones (Policy PEM15). | | |
| | | | The buildings along the main routes through the village (east-west and north-south) are a mixture comprising black and white, brick and rendered buildings vernacular to the area. It is important that this mix is maintained and new developments have a range of these materials rather than concentrate on pseudo vernacular timber framed constructions which are beginning to dominate the current mix. Developments such as Court Meadow demonstrate a blend of modern design with traditional elements. The site blends into its setting in contrast to some infill buildings of other materials from the late 20 th century which can detract from the surrounding buildings. The NDP seeks to address the matter of design in policies PEM6 and PEM20, | | No change proposed |
| | | | Public health policy on obesity and that on mental health focuses on the importance of exercise and outdoor spaces. This is considered when assessing sites through distance to the village hall and Millennium Meadow. It is vital that wherever possible new buildings should have their own outdoor space large enough for toddlers to play in. Communal spaces however near require adult supervision and time is limited for working parents, and often the virtual world can and does replace the physical experience from an increasingly young age. The NDP seeks to address the matter of garden space in policy PEM6 j) so far as it considers able to do so. | | No change proposed |
| C.9 J Myers | Paras 2.3, 2.4, 4.2 and 4.4 | Comment | Given the demographics of Pembridge with an older profile that Herefordshire and the need to attract a younger age group to ensure a sustainable community, it would seem there is an obvious need for a significant number of smaller, intermediate, shared ownership and rental properties to be constructed along with easy accessible housing for the 50% of population over retirement age and heading for very old age. The types of properties considered appropriate to meet local needs are set out in policy PEM5 and the types of dwellings referred to are covered in that policy. | No change proposed | |
| | Para 6.9 | Comment | Not only does broadband need to improve but in parts of Pembridge there are mobile 'not-spots' Lower Bearwood being one. Policy PEM12 covers this issue | | No change proposed |
| | Evidence Base | Comment | The questionnaire was poorly designed – the housing section did not allow for prioritisation of different types of housing and was not fully indicative of requirements. The questionnaire was one of a number of contributions used to direct the content of the NDP. Policy PEM5 is the relevant policy and together with the subsequent supporting statements sets out the needs that have been identified. It is uncertain from this representation whether the proposed approach is considered correct or not. | | No change proposed |
| C.10 N Cooper | Housing section | Comment | Self-build should be encouraged to allow locals to build houses to reflect their own needs, provide local distinctiveness, encourage young vibrant/enthusiastic families to settle and support the local school, give work to local trades as opposed to developer build who import people from outside, and follow current Government thinking. Noted – it is not possible to be that specific in relation to the way each site is developed although one of the reasons for the emphasis on small sites is to promote self-build. Other policies in the plan aim to ensure that local distinctiveness is | No change proposed | |

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| | | | maintained on all sites. The whole of Pembridge village falls within its Conservation Area and this strengthens the ability to ensure its character and appearance is maintained or enhanced. | |
| C.11 Gladman Developments Ltd | General | | Offer to assist with the preparation of the NDP; refer to the need for the NDP to meet the Basic Conditions requirement; points to the requirements set out in the NPPF; advises that there is supplementary 'Planning Practice Guidance'; and refers to the provisions of Herefordshire Local Core Strategy. Both the NDP Steering Group and the Parish Council is aware of the requirements that need to be met in terms of complying with the relevant Regulations. | No change proposed |
| | Policy PEM3 | | Opposes the restricting development to that within the settlement boundary in that it will preclude other sustainable development, arbitrarily restricts suitable development and does not represent a positive approach to growth. The policy should indicate that demonstrably sustainable development adjacent to the settlement boundary would be supported. Herefordshire Core Strategy paragraph 4.8.23 indicates that settlement boundaries should be defined and this was a requirement set by the Inspector at the public examination into that plan who wishes it to be clear where development was to take place and what would be considered 'open countryside'. Core Strategy policy RA2 indicates that development should be within or adjacent to the built-up area of the settlement. The NDP has allocated sites and defined a settlement boundary that provides for more than he required level of proportional growth. The NDP provides certainty to both developers and the community for the plan period. The approach adopted is consistent with that for most if not all settlements within the County. | No change proposed |
| | Policy PEM6 | | Design principles should not be overly onerous to render development unviable. The design policies should avoid unnecessary prescription or detail and should concentrate on guiding the overall scale, density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area more generally. Plans should not contain such policies that would add financial burdens to a scheme which would render a scheme unviable. Noted – Given the importance of design in terms of ensuring the character and appearance of Pembridge Conservation area is preserved or enhanced, the design criteria are considered reasonable and appropriate. Pembridge has been identified as being within the top 50 conservation areas within the country. There is no reason to believe that the approach, which continues that previously adopted, has affected viability. | No change proposed |
| | Policy PEM18 | | Whilst supporting the thrust of this policy, the need for criteria based policies in relation to proposals affecting protected wildlife or geodiversity sites or landscape areas, and that protection should be commensurate with their status and gives appropriate weight to their importance and contributions to wider networks. As currently drafted this policy does not align with the NPPF given it fails to make a distinction and recognise that there are two separate balancing exercises which need to be undertaken for national and local designated sites and their settings. The policy should be revisited to ensure that it is consistent with the approach set out within the Framework, It is considered that the policy is consistent with the NPPF and reflects similar approaches in other neighbourhood plans that have been adopted. | No change proposed |
| | Policy PEM19 | | The significance of the designated heritage asset should be assessed and where there is less than substantial harm, this should be weighed in the planning balance against the public benefits of the proposal. Where there is deemed to be substantial harm, then the proposal would need to achieve substantial public benefits to outweigh that harm. | See Change No 34 |

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| | | | For non-designated heritage assets, the policy must reflect the guidance that the test that should be applied in these cases is that a balanced judgement should be reached having regard to the scale of any harm and the significance of the heritage asset. This is the intention of the policy although it is recognised that the need for the significance to be assessed should be indicated. The policy then describes the level of weight that should be given to the various heritage assets. | |
| C.12 T Norman | Para 2.13 | | Flood map is not at Figure 1 This is an error and grateful to it being pointed out | See Change No 6 |
| | Para 2.14 | | There is no grade 1 agricultural land in the Parish The agricultural land classification map is at a relatively small scale and it appears to show grade 1 land in the Bearwood area and between Pembridge and Dilwyn. However, the greater knowledge of the person making this representation is accepted | See change No 7 |
| | Para 2.17 | | Take out 'deteriorating'. This is helpful advice | See change No 8 |
| | Para 2.19 | | Moseley Common is not 'unfavourable recovering' but '100% favourable'. Can only find 6 SWS within the Parish – details provided to show this dated August 2017. The updated advice about Moseley Common is helpful advice. The figure for SWS is taken from the SEA Scoping report although it is noted one of the 12 lies outside of the Parish. | See change No 9 |
| | Para 3.21 | | The River Lugg is in unfavourable condition and measures to ensure its improvement will be affected by water quality from the River Arrow This is helpful advice | See change No 11 |
| | Para 3.22 | | Insert 'A range of locally important sites including Special Wildlife Sites, Ancient Woodland Sites, Sites of Special Scientific Interest, This is helpful advice | See change No 12 |
| | Para 3.24 | | Wording - The condition of the River Lugg and River Wye is failing the Habitats Directive due to the excessive levels of phosphates that effect It is understood 2020 – 2025. How do we know growth can be accepted? It will be appropriate to take a precautionary approach Last sentence is wrong. There have several recent pollution incidents. I have been involved with these and Welsh water has spent a lot of time and money trying to correct them. It is understood from Herefordshire Council that Dwr Cymru/Welsh Water has confirmed it will ensure its investment programme will accommodate the level of growth required. This has been confirmed (see representation S2 below). Policy PEM22 (including the suggested alteration) does provide for development to be phased to ensure it can be accommodated within the necessary investment programme. The Steering Group was not aware that this has been an issue recently but will amend the last sentence to reflect this advice. | See change No 13 |
| | Para 5.11 | | 'Parish' not 'village' The figure relates to possible windfall development within Pembridge village settlement boundary. A further windfall allowance has been assessed for the rural parts of the parish – see paragraph 5.26 | No change proposed |
| | Para 5.12 | | Minimum of 44? Dwellings (after current and windfall) The figure relates to the probable minimum contributions made by the seven sites | No change proposed |

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| | Para 5.20 | | Old Burgage plots are to rear of surgery – look at map. Noted and this should be changed. | See change No 20 |
| | Para 5.24 | | Need to discuss – all the building behind the Village (Hall?) will put pressure on the New Inn roads. May be potential to start ‘ring road’ through putting road out to Western Estates. The potential effect of development on the New Inn roads is acknowledged and why development in this direction is limited. The potential adverse effects of traffic arising from development apply to all the roads within the village and the purpose of spreading development across these roads is to try to minimise the effects overall. There is no proposal for what would be a major highway infrastructure project within either Herefordshire Core Strategy or the Local Transport Plan. Consequently, the NDP cannot include such a proposal. | No change proposed |
| | Para 6.8 | | Lugg and then the Wye – the Nutrient Management Plan has been prepared. Last sentence – agriculture and housing does not add further It is a matter of debate as to whether the current NMP as yet contains measures to address the phosphate issue within the Rivers Lugg and Wye. Currently it is more of a ‘road map’ indicating what further work is necessary to prepare appropriate actions. Neither the Environment agency nor Herefordshire Council has suggested this reference should be changed. As a consequence, it is felt the current statement should be retained. | No change proposed |
| | Para 6.11 | | Add ‘light’ to noise. Helpful suggestion | See change No 27 |
| | Policy PEM14 | | d) They will not affect biodiversity, ‘e.g. hydro schemes’ It would not be appropriate to suggest this example meets the criterion. Whether it meets the criterion is a matter to be judged in each instance. It may be possible for a hydro scheme to affect biodiversity. | No change proposed |
| | Para 6.13 | | Typo – last line – ‘wold’ This is an error and grateful to it being pointed out | See change No 28 |
| | Para 7.1 | | Include the church. It would be useful to include reference to the Church. | See change No 29 |
| | Para 7.4 | | Not sure if this is the place but add ‘But the Parish is short of Burial space which will run out in 18 months. There is a need to negotiate a new expansion of the existing or find a new site (possibly by the village hall?)’ This paragraph describes those areas designated as ‘Local green Space’ and is not one where you would suggest sites for a new or expanded burial ground. Should it be the intention to look for a site then the most appropriate place to refer to this is in Appendix 2. Should it be intended to propose a site then a specific policy may be more appropriate. | No change proposed |
| | Policy PEM18 | | d) miss out ‘continued improvement’; insert ‘favourable status’. New g) retain the Special Wildlife Sites Helpful advice in relation to ‘c)’. With regard to Special Wildlife Sites, these are referred to in criterion e). DEFRA guidance increasingly refers to the ‘local sites network’ although it could be made clearer in both the policy and supporting statement that this is what is being referred to. It should however be noted that the sites were designated in the 1970/80s and although those within much of north Herefordshire were reviewed in the 1990s. Some sites were reviewed later through a process of preparing management plans for a number, although the current status and condition of many is unknown. The approach is now based more upon an ‘alert’ whereby should proposals be advanced | See changes No 32 |

| Respondent Identification Number | Section/ Policy Number | Support/ Object/ Comment/Recommend change/etc. | Suggested Changes Parish Council Consideration (In blue) | Proposed Change Number |
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| | | | for local wildlife sites, they would need to be assessed to determine their current value. Hence a policy to seek their retention per-se would not be appropriate but should refer to protecting their biodiversity value. | |
| | Policy PEM19 | | b) ref behind the surgery Noted although the character of this area appears to have ben eroded. | No change proposed |
| | Policy PEM20 | | 4. TPOs are not required – trees are covered by the Conservation Area. Trees are only protected for a 6-week notification period when they fall within a conservation area. Should permanent protection be required then a TPO should be used. | No change proposed |
| | Policy PEM22 | | Very important Noted | No change proposed |
| | Para 9.1 | | This has always been the case, ref the last NDP and parish minutes to 1955. May be develop a short road to the western edge of the village and leave space for a future road to the east – Ref PEM24 – last sentence. To reserve land for such a scheme would require either Herefordshire Council or the Parish Council to make available resources for purchasing the relevant land. Herefordshire Council has not proposed a highways project for Pembridge within its Core Strategy or Local Transport Plan. As such that Council is not committed to such a project. The Parish Council is not in a position to fund such a project. It is understood any requirement for a landowner to make available land or develop part of such a road as part of any development scheme would not comply with provisions relating to the application of conditions or planning obligations. | No change proposed |
| | Appendix 2 | | Enabling Associated Measures - Burial Ground; Bypass Should it be the Parish Council’s intention to seek a new or extended burial ground then it would be useful to refer to this within Appendix 2. Should it be the intention to use the NDP to identify a site then a policy covering this might be appropriate although the implications of such an approach would need to be carefully considered. Herefordshire Council would be responsible for any bypass and there is no proposal for what would be a major highway infrastructure project within either Herefordshire Core Strategy or the Local Transport Plan. Consequently, the NDP cannot include such a proposal. | Advice awaited from the Parish Council |
| | Map 3.1 | | 14 is on Burgage Plots; 30 is a Special Wildlife Site; Show possible Bypass and Burial Ground Map 3.1 shows sites assessed for housing. Appendix 3 is a summary of the full report prepared for that purpose presented for ease of reference at this stage of plan preparation. The full report can be seen upon the Parish Council’s website. Appendix 3 will not form part of the final document. The specific matters of site 14, bypass and burial ground are responded to elsewhere in this representation. Site 30 is not proposed for development. | No change proposed |
| | SEA | | In spite of Environmental Report being date July 2017, it is full of typos, inadequate and incorrect information. MAP SEA1 fails to include the Mosely SSSI and the Special Wildlife Sites. One of the most i9mportant things to note is that under the Water Framework Directive, comes into 4 water bodies – the Pinsley, the River Arrow, the Curl Brook and the Tippets Brook. All fail to reach good ecological status. Under the Habitats Directive, the River Arrow delivers into the River Lugg (Wye) SAC which is failing due to phosphates. The Environmental Report has been produced by Herefordshire Council. This comment will be forwarded to that Council | No change proposed |

Schedule 2: Stakeholder Representations and Response

| Stakeholder | Section/ Policy Number | Support/ Object/ Comment/Recommend change/etc. | Comment Parish Council Consideration (in blue) | Amendment Number |
|---|------------------------|--|--|---|
| S.1 Herefordshire Council (Statutory Consultee) | Whole Plan | Comment | This Neighbourhood Plan is well researched and incorporates details and conclusions taken from consultations held with the Parishioners. Noted | No change proposed |
| | Housing Growth | Comment | The policies of the Pembridge Draft NDP take into consideration the NPPF and the Herefordshire Local Plan (Core Strategy) and provide further detail on the higher-level policies whilst in the main remaining in general conformity. The plan demonstrates that the delivery of the housing growth within the Parish is likely to come forward within the plan period. Noted | No change proposed |
| | Policy PEM1 | Comment | In accord with equivalent CS policy SS1 Noted | No change proposed |
| | Policy PEM2 | Comment | In accord with equivalent CS policy RA2-RA6 Noted | No change proposed |
| | Policy PEM3 | Comment | In accord with equivalent CS policy RA2 - NB Land to East of Oak View- If the existing buildings on site are agricultural- the site must be classified as greenfield, not brownfield. Noted. It is likely that the buildings have a mixture of uses, including agricultural. Given that the status of the barns is to a large extent irrelevant in that their removal would benefit the character and appearance of the Conservation Area, there is no need to refer to the current status of either greenfield or brownfield in paragraph 5.8. | See change No 18 |
| | Policy PEM4 | Comment | In (POSSIBLY or UNCERTAIN) accord with equivalent CS policy RA2 Site 1- It is worth noting that the 2012 Strategic Housing Land Availability Assessment (SHLAA) concluded that creating an access would almost certainly necessitate the removal of hedgerow, contrary to criterion 4 of policy PEM20, which states that development should not lead to this. The following five allocated housing sites are within 250m of a known closed landfill site which is a use that may be considered potentially contaminative: <ul style="list-style-type: none"> • Site 2: Land off Manley Crescent (PEM 4ii). • Site 3: Land off Sandiford Ploc (PEM 4iii). • Site 5: To the rear of The Gables (PEM 4v). • Site 6: Land at Townsend (PEM 4vi). • Site 7: Land to the west of Manley Lane (PEM 4vii). It will be necessary for the applicant to undertake a site investigation to consider the risk from the landfill to these sites. | Issue 1 – no change proposed. Issue 2 – see change No 19 |

| Stakeholder | Section/ Policy Number | Support/ Object/ Comment/Recommend change/etc. | Comment Parish Council Consideration (in blue) | Amendment Number |
|-------------|------------------------|--|---|---|
| | | | <p>We would recommend a condition be appended to any planning approval to ensure the site is both safe and suitable for its intended use. ((Example of a suitably worded condition was provided).</p> <p>Site 1 (Land to rear and south of Pembridge village Hall, is a large arable field. There is already a gap in the hedgerow along this boundary affording access to the village hall. The removal of part of its hedgerow to afford access to any development is not considered such as to remove an essential component of the character of the Conservation area at this point. PEM20 only seeks to retain hedgerows that are an essential component of the Conservation Area character. Compensatory planting along the site's southern edge will more than compensate for any loss of biodiversity. Such compensatory measures will meet the requirements of Herefordshire Core Strategy policy LD2 d).</p> <p>In relation to the five sites within 250 m of a closed landfill site, this advice is helpful and appreciated.</p> | |
| | Policy PEM5 | Comment | <p>In accord with equivalent CS policy H3</p> <p>Restricting/identifying housing type as detached or semi-detached properties could provide an over-supply of that type of housing. They're more expensive than other additional types e.g. terraced and could price young people out of the property market.</p> <p>Noise, dust, odours or general nuisance to residential occupants might arise as a result of any new development and also the impact that existing activities might have on the amenity of any new residential occupiers. To safeguard the amenity of future occupiers, suggest an amendment to housing policy reference PEM5 g). 'Properties that enable people to work from home, including live/work units where this will not affect the amenity of adjacent properties <i>and where the new housing development will not be adversely impacted by existing agricultural or commercial activities.</i></p> <p>The first point is noted. In relation to the second point it is not the intention to provide more expensive dwellings but to retain the character and appearance of Pembridge Conservation Area and density and traffic generation are important in this regard upon the sites allocated for housing. However, it is acknowledged that this may be too prescriptive and that good design can be achieved through terraced accommodation. The change proposed to Policy PEM6 will address the last issue.</p> | <p>See change No 21</p> <p>See change No 22</p> |
| | Policy PEM6 | Comment | <p>In accord with equivalent CS policy LD1-LD3, SD1</p> <p>Noise, dust, odours or general nuisance to residential occupants might arise as a result of any new development and also the impact that existing activities might have on the amenity of any new residential occupiers. To safeguard the amenity of future occupiers, suggest an amendment to housing policy reference PEM6 g). 'Not adversely affect the amenity of adjacent properties <i>nor be adversely impacted by existing agricultural or commercial activities.</i></p> <p>Noted and the advice in relation to the potential effects of adjacent uses is welcome.</p> | See change No 22 |
| | Policy PEM7 | | <p>In accord with equivalent CS policy H1</p> <p>With regards to the local connection criteria restriction live in the parish to 10 years is unreasonable especially since</p> | Issue 2 – see change No 23 |

| Stakeholder | Section/ Policy Number | Support/ Object/ Comment/Recommend change/etc. | Comment Parish Council Consideration (in blue) | Amendment Number |
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| | | | housing legislation is 6 out of 12 months and 3 out of 5 years. Would not support a 10-year local connection criterion and is not in line with HC's S106's. The first point is noted In relation to the second point, it is thought the response is a misinterpretation of the policy statement which suggests it needs to be reworded. The intention is to cover those not living within the parish at present but who have lived there in the past 10 years. An amendment may help to ensure its interpretation is better understood. The aim is to increase flexibility not restrict it. | |
| | Policy PEM8 | Comment | In accord with equivalent CS policy RA5 Noted | No change proposed |
| | Policy PEM9 | Comment | In accord with equivalent CS policy E3 Noted | No change proposed |
| | Policy PEM10 | Comment | In accord with equivalent CS policy RA6, E4 Noted | No change proposed |
| | Policy PEM11 | Expresses Concern | In accord with equivalent CS policy RA6. One area of concern relates to policy PEM11, where by it is questionable if the distances specified in c) would be accepted as there is no sound evidence to support the 600m and this may be open to legal challenge. The level of detail regarding manure spreading should be reviewed and as this is an Environmental Health and Environment Agency issue to enforce rather than something that can be mitigated through policy. First issue noted. In relation to the second issue, this policy is one that addresses a matter of significant concern within the Parish and a separate report has been prepared to support the approach being proposed. | To be advised. |
| | Policy PEM12 | Comment | CS policy Not applicable but in conformity with CS Noted | No change proposed |
| | Policy PEM13 | Comment | In accord with equivalent CS policy E1, E2 Noted | No change proposed |
| | Policy PEM14 | Comment | In accord with equivalent CS policy SD2 Noted | No change proposed |
| | Policy PEM15 | Suggest change | In accord with equivalent CS policy SC1 - Identifying and listing particular valued community facilities to be protected and/or enhanced would give the policy greater effect in the event of proposals which may affect them. Helpful advice | See change No 30 |
| | Policy PEM16 | Comment | CS policy Not applicable but in conformity with CS Noted | No change proposed |
| | Policy PEM17 | Comment | CS policy Not applicable but in conformity with CS Noted | No change proposed |

| Stakeholder | Section/ Policy Number | Support/ Object/ Comment/Recommend change/etc. | Comment Parish Council Consideration (in blue) | Amendment Number |
|--|------------------------|--|--|--------------------|
| | Policy PEM18 | Comment | In accord with equivalent CS policy LD1-LD3 Noted | No change proposed |
| | Policy PEM19 | Comment | In accord with equivalent CS policy LD4 Noted | No change proposed |
| | Policy PEM20 | Comment | In accord with equivalent CS policy LD4 Noted | No change proposed |
| | Policy PEM21 | Comment | In accord with equivalent CS policy SD3 Noted | No change proposed |
| | Policy PEM22 | Comment | In accord with equivalent CS policy SD4 Noted | No change proposed |
| | Policy PEM23 | Comment | In accord with equivalent CS policy SD1 Noted | No change proposed |
| | Policy PEM24 | Comment | In accord with equivalent CS policy MT1 Noted | No change proposed |
| | Policy PEM25 | Comment | In accord with equivalent CS policy MT1 Noted | No change proposed |
| | Policy PEM26 | Comment | In accord with equivalent CS policy MT1 Noted | No change proposed |
| S2 Welsh Water Dwr Cymru (Statutory Consultee) | Whole plan | Comment | DCWW are supportive of the aims, objectives and policies set out. Noted | No change proposed |
| | Whole Plan | Comment | Particularly pleased to note the references throughout towards the provision of sustainable drainage systems in new development. Noted | No change proposed |
| | PEM22 | Suggest change | In particular are pleased with the inclusion of PEM22: Sewage Infrastructure. However, recommend that it is reworded to the following for clarity with regard to the sewerage network as well as the wastewater treatment works (WwTW): <i>New Policy: Public sewerage network and wastewater treatment works (WwTW)</i> <i>Development that may result in the capacity of the public sewerage network and/or the Pembridge wastewater treatment works (WwTW) becoming overloaded will not be permitted.</i> <i>In either of these instances, development will need to be phased or delayed until capacity becomes available, either through DCWW regulatory investment or, in advance of this through the developer funding the improvements themselves via the provisions of the Water Industry Act (1991) and/or section 106 of the Town and Country Planning Act (1990).</i> The advice is appreciated and will be taken on board. | See change No 37 |
| | Whole Plan | Comment | With regard to the growth proposed in the Neighbourhood Development Plan, there ought to be no issue in the WwTW | No change proposed |

| Stakeholder | Section/ Policy Number | Support/ Object/ Comment/Recommend change/etc. | Comment Parish Council Consideration (in blue) | Amendment Number |
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| | | | accepting the foul only flows though should there may come a time where capacity becomes restricted then the above policy will suffice. Noted | |
| | Whole Plan | Comment | In terms of the public sewerage network and the clean water supply, there are no specific issues but some level of off-site mains/sewers may be required in order to connect to the existing respective networks. Noted | No change proposed |
| S3 (Sports England) | Section 7 - Community Facilities, Amenities and Services | Comment | The NDP should comply with national planning policy for sport as set out in the NPPF with particular reference to Pars 73 and 74. The is a presumption against the loss of playing field land. Although no specific needs for sporting facilities have been identified the NDP does enable provision of such community facilities should a future demand arise. There are no proposals that would lead to the loss of any playing fields. | No change proposed |
| | | | | |
| | Section 7 - Community Facilities, Amenities and Services | Comment | Local authority Local Plan should be underpinned by robust and up to date evidence in line with Par 74 of the NPPF, in the form of assessments of need and strategies for indoor and outdoor sports facilities . It is important that a neighbourhood plan reflects the recommendations and actions set out in playing pitch strategy or other indoor/outdoor sports facility strategy, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery. If there is no evidence then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area in consultation with the local sporting and wider community to provide key recommendations and deliverable actions. These should ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies It is understood Herefordshire Council has not expressed the need for any additional indoor or outdoor sports facilities within the Parish. The need for further such facilities was not identified in the community consultation although improvements to certain facilities that might benefit a healthy lifestyle were suggested. Where appropriate these have been highlighted in the Appendix to the NDP. | No change proposed |
| | | | | |
| | Section 7 - Community Facilities, Amenities and Services | Comment | If new or improved sports facilities are proposed Sport England recommend you ensure they are fit for purpose No specific facilities are proposed but the sentiment is noted. | No change proposed |
| | | | | |
| Section 7 - Community Facilities, Amenities and Services | Comment | New housing will generate additional demand for sport in addition to any other assessed needs and planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered where required. New development should provide opportunities for people to lead healthy lifestyles and create healthy communities. Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. Noted although no need for land to be made available for additional sports facilities within the Parish has been | No change proposed | |
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| Stakeholder | Section/ Policy Number | Support/ Object/ Comment/Recommend change/etc. | Comment Parish Council Consideration (in blue) | Amendment Number |
|--|-------------------------------------|--|---|--------------------|
| | | | identified. Resources will be sought through planning obligations to support the expansion/enhanced use of community facilities which should benefit health and wellbeing and indirectly support active lifestyles. | |
| S4 Historic England (Statutory Consultee) | Whole Plan | Comment | Supports both the content of the document and the vision and objectives set out in it. The emphasis on the conservation of local distinctiveness and variations in local character through good design and the protection of locally significant buildings, historic farmsteads and landscape character including archaeological remains and the burgage layout of the village is to be applauded. Overall the plan reads as a very well written, well-considered document which is eminently fit for purpose. We consider that the Plan takes an exemplary approach to the historic environment of the Parish and that it constitutes a very good example of community led planning. Those involved in the production of the Plan should be congratulated as in the view of Historic England it exemplifies "constructive conservation". Noted with thanks | No change proposed |
| S5 Natural England (Statutory Consultee) | SEA | Comment | Welcomes the production of the SEA report, and notes and concurs with the outcome. Noted | No change proposed |
| | HRA | Comment | Agree with the conclusion of no likely significant effect upon River Wye Special Area of Protection (SAC) Noted | No change proposed |
| | Whole Plan | Comment | No specific comments to make but attach a standard statement of issues and opportunities to consider when preparing Neighbourhood Plans Noted | No change proposed |
| S.6 Environment Agency (Statutory Consultee) | Whole Plan | Comment | It is important that these plans offer robust confirmation that development is not impacted by flooding and that there is sufficient waste water infrastructure in place to accommodate growth for the duration of the plan period. 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. I acknowledge, that all the proposed site allocations are located wholly within Flood Zone 1, the low risk Zone. 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 your drainage team as the Lead Local Flood Authority (LLFA). Comments Noted. Herefordshire Council, who is understood to be the LLFA, was consulted on the draft NDOP and has not commented on this matter. | No change proposed |
| S.7 Highways Agency (Statutory Consultee) | None | None | NO RESPONSE RECEIVED No response suggests happy with plan or no adverse comments to make. Strategic Highway Network is not affected by the Plan | No change proposed |
| S.8 (Shobdon Parish Council) | Policies PEM2c and PEM13; para 6.10 | Comment | Notes that both Policy PEM2c and Policy PEM13 reference development at Shobdon airfield and concerns over any increase in traffic. Paragraph 6.10 also highlights that traffic from the Kingspan site mainly utilises the B4362 through Shobdon. Shobdon PC shares Pembridge's concerns over how commercial traffic will be dealt with whilst still allowing for appropriate economic development at these sites. The Parish Council believes there should be an onus on | No change proposed |

| Stakeholder | Section/ Policy Number | Support/ Object/ Comment/Recommend change/etc. | <p style="text-align: center;">Comment Parish Council Consideration (in blue)</p> | Amendment Number |
|-------------|-------------------------|--|--|--------------------|
| | | | <p>Herefordshire Council to work with businesses and employers to ensure that any planning permissions or developments in this area be conditional on applicants making s106 contributions to traffic calming measures in the parishes affected by the increase in traffic. Shobdon Parish Council would welcome the opportunity to work in partnership with Pembridge Parish Council when considering any future developments at the airfield.</p> <p>Pembridge Parish Council would be happy to work with Shobdon Parish Council on this matter.</p> | |
| | Policies PEM4 and PEM17 | Comment | <p>The majority of the housing site allocations within the Pembridge NDP are for less than 10 dwellings, and as such below the level at which section 106 contributions or requirements for affordable housing are required. The Shobdon NDP similarly focused on small scale developments and would welcome some assurance from Herefordshire Council that the CIL (community infrastructure levy) referred to in the Pembridge NDP will come to fruition to support rural communities where large housing developments are inappropriate.</p> <p>The comment is noted and Pembridge PC shares the concern. It is a matter that needs to be taken up with HC and Pembridge PC would support Shobdon PC should this be raised in any forum. Pembridge PC would also press HC to ensure that every opportunity is taken to obtain potential contributions, whether through the S106 obligations or CIL, to support community facilities within the parish.</p> | No change proposed |