

## Latham, James

---

**From:** Turner, Andrew  
**Sent:** 23 October 2019 16:23  
**To:** Neighbourhood Planning Team  
**Subject:** RE: Bredenbury & District Group Regulation 16 submission neighbourhood development plan consultation

### RE: Bredenbury and District Group Regulation 16 draft Neighbourhood Development Plan

Dear Neighbourhood Planning Team,

I refer to the above and would make the following comments with regard to the above proposed development plan.

It is my understanding that you do not require comment on Core Strategy proposals as part of this consultation or comment on sites which are awaiting or have already been granted planning approval.

Having reviewed records readily available, I would advise the following regarding the four (1,2,5 and 7) site allocations identified for new housing development (Policy BW&GB 4) as outlined in yellow on Map 4: 'Policy BW&GB 4 – Housing allocations'

#### Site 2 – South of Brockington

The proposed site area; '*Site 2 – South of Brockington*' is a site which historical maps from 1888 indicate is located on a former quarry. Since 1982 the area had been classed as unknown filled ground (pit, quarry etc.)

- Sites identified as unknown filled ground can be associated with contaminative fill material. In practice, many sites identified through the historical mapping process as unknown filled ground are instances where hollows have been made level with natural material, have remained as unfilled 'hollows' or have filled through natural processes. However, there are some instances where the nature of the fill is not inert and would require further investigation. Without any additional information it is not possible to comment further on this site. Any additional information you may be able to obtain will help in determining the exact nature of the site.

The site's historic potentially contaminative use will require consideration prior to any development.

Any future redevelopment of the site would be considered by the Planning Services Division of the Council however, if consulted it is likely this division would recommend any application that is submitted should include, as a minimum, a 'desk top study' considering risk from contamination in accordance with BS10175:2011 so that the proposal can be fully considered. With adequate information it is likely a condition would be recommended such as that included below:

1. No development shall take place until the following has been submitted to and approved in writing by the local planning authority:
  - a) a 'desk study' report including previous site and adjacent site uses, potential contaminants arising from those uses, possible sources, pathways, and receptors, a conceptual model and a risk assessment in accordance with current best practice
  - b) if the risk assessment in (a) confirms the possibility of a significant pollutant linkage(s), a site investigation should be undertaken to characterise fully the nature and extent and severity of contamination, incorporating a conceptual model of all the potential pollutant linkages and an assessment of risk to identified receptors

c) if the risk assessment in (b) identifies unacceptable risk(s) a detailed scheme specifying remedial works and measures necessary to avoid risk from contaminants/or gases when the site is developed. The Remediation Scheme shall include consideration of and proposals to deal with situations where, during works on site, contamination is encountered which has not previously been identified. Any further contamination encountered shall be fully assessed and an appropriate remediation scheme submitted to the local planning authority for written approval.

Reason: In the interests of human health and to ensure that the proposed development will not cause pollution to controlled waters or the wider environment.

2. The Remediation Scheme, as approved pursuant to condition no. (1) above, shall be fully implemented before the development is first occupied. On completion of the remediation scheme the developer shall provide a validation report to confirm that all works were completed in accordance with the agreed details, which must be submitted before the development is first occupied. Any variation to the scheme including the validation reporting shall be agreed in writing with the Local Planning Authority in advance of works being undertaken.

Reason: In the interests of human health and to ensure that the proposed development will not cause pollution to controlled waters or the wider environment.

3. If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the local planning authority) shall be carried out until the developer has submitted, and obtained written approval from the local planning authority for, an amendment to the Method Statement detailing how this unsuspected contamination shall be dealt with.

#### **General comments:**

Developments such as hospitals, homes and schools may be considered 'sensitive' and as such consideration should be given to risk from contamination notwithstanding any comments. Please note that the above does not constitute a detailed investigation or desk study to consider risk from contamination. Should any information about the former uses of the proposed development areas be available I would recommend they be submitted for consideration as they may change the comments provided.

It should be recognised that contamination is a material planning consideration and is referred to within the NPPF. I would recommend applicants and those involved in the parish plan refer to the pertinent parts of the NPPF and be familiar with the requirements and meanings given when considering risk from contamination during development.

Finally it is also worth bearing in mind that the NPPF makes clear that the developer and/or landowner is responsible for securing safe development where a site is affected by contamination.

These comments are provided on the basis that any other developments would be subject to application through the normal planning process.

Kind regards

Andrew



The Coal  
Authority



200 Lichfield Lane  
Berry Hill  
Mansfield  
Nottinghamshire  
NG18 4RG

Tel: 01623 637 119 (Planning Enquiries)

Email: [planningconsultation@coal.gov.uk](mailto:planningconsultation@coal.gov.uk)

Web: [www.gov.uk/coalauthority](http://www.gov.uk/coalauthority)

For the Attention of: Neighbourhood Planning  
Herefordshire Council

**[By Email: [neighbourhoodplanning@herefordshire.gov.uk](mailto:neighbourhoodplanning@herefordshire.gov.uk) ]**

14 October 2019

Dear Neighbourhood Planning

**(2) Bredenbury & District Group Neighbourhood Development**

Thank you for consulting The Coal Authority on the above.

Having reviewed your document, I confirm that we have no specific comments to make on it.

Should you have any future enquiries please contact a member of Planning and Local Authority Liaison at The Coal Authority using the contact details above.

Yours sincerely

**Christopher Telford BSc(Hons) DipTP MRTPI**  
**Principal Development Manager**

## Latham, James

---

**From:** Norman Ryan <Ryan.Norman@dwrcymru.com>  
**Sent:** 14 October 2019 11:23  
**To:** Neighbourhood Planning Team  
**Subject:** RE: Bredenbury & District Group Regulation 16 submission neighbourhood development plan consultation

Dear Sir/Madam,

I refer to the below consultation and would like to thank you for consulting Welsh Water.

As you may be aware, we were consulted and provided representation as part of the Regulation 14 consultation earlier this year. As such, we have no further comment to make at this time.

If you require any further information, then please let me know.

Kind regards,



**Ryan Norman**  
**Lead Forward Plans Officer | Developer Services | Dwr Cymru Welsh Water**  
Linea | Cardiff | CF3 0LT | T: 0800 917 2652 | [www.dwrcymru.com](http://www.dwrcymru.com)

*We will respond to your email as soon as possible but you should allow up to 10 working days to receive a response. For most of the services we offer we set out the timescales that we work to on our Developer Services section of our website. Just follow this link <http://www.dwrcymru.com/en/Developer-Services.aspx> and select the service you require where you will find more information and guidance notes which should assist you. If you cannot find the information you are looking for then please call us on 0800 917 2652 as we can normally deal with any questions you have during the call.*

*If we've gone the extra mile to provide you with excellent service, let us know. You can nominate an individual or team for a Diolch award through our [website](#).*

---

**From:** Neighbourhood Planning Team <neighbourhoodplanning@herefordshire.gov.uk>  
**Sent:** 19 September 2019 12:01  
**Subject:** Bredenbury & District Group Regulation 16 submission neighbourhood development plan consultation

\*\*\*\*\* External Mail \*\*\*\*\*

Dear Consultee,

Bredenbury & District Group Parish Council have submitted their Regulation 16 Neighbourhood Development Plan (NDP) to Herefordshire Council for consultation.

The plan can be viewed at the following link:

[https://www.herefordshire.gov.uk/directory\\_record/3035/bredenbury\\_and\\_district\\_group\\_neighbourhood\\_development\\_plan](https://www.herefordshire.gov.uk/directory_record/3035/bredenbury_and_district_group_neighbourhood_development_plan)

Once adopted, this NDP will become a Statutory Development Plan Document the same as the Core Strategy.

The consultation runs from 19 September 2019 to 31 October 2019.

If you wish to make any comments on this Plan, please do so by e-mailing:

[neighbourhoodplanning@herefordshire.gov.uk](mailto:neighbourhoodplanning@herefordshire.gov.uk), or sending representations to the address below.



Historic England

Mr James Latham  
Herefordshire Council  
Neighbourhood Planning & Strategic Planning  
Planning Services, PO Box 230, Blueschool House  
Blueschool Street  
Hereford  
HR1 2ZB

Direct Dial: 0121 625 6887

Our ref: PL00580433

25 October 2019

Dear Mr Latham

**BREDENBURY, WACTON AND GRENDON BISHOP DRAFT NEIGHBOURHOOD PLAN REGULATION 16 CONSULTATION**

Thank you for the invitation to comment on the Submission Draft Neighbourhood Plan. Our previous comments on the Regulation 14 Plan remain entirely relevant, that is:

*“Historic England are supportive of the Vision and objectives set out in the Plan and the content of the document, particularly its’ emphasis on local distinctiveness including undesignated heritage assets and the maintenance of historic rural character. The recognition of the importance of archaeological remains and historic farmsteads is equally commendable. We also welcome the undertaking of a characterization study which, as part of the Plan evidence base, has provided a detailed context for protective plan policies to be developed in relation to the historic environment”.*

In conclusion, Historic England highly commends the approaches taken in the Plan to the conservation of the historic environment and considers the draft Neighbourhood Plan to be a well-considered, concise and fit for purpose document.

Beyond those observations we have no further substantive comments to make on what Historic England considers is a good example of community led planning”.

I hope this is helpful.

Yours sincerely,

Peter Boland  
Historic Places Advisor  
peter.boland@HistoricEngland.org.uk

CC:



THE AXIS 10 HOLLIDAY STREET BIRMINGHAM B1 1TF

Telephone 0121 625 6888  
HistoricEngland.org.uk



**Latham, James**

---

**From:** Knight, Matthew  
**Sent:** 19 September 2019 16:08  
**To:** Neighbourhood Planning Team  
**Subject:** RE: Bredenbury & District Group Regulation 16 submission neighbourhood development plan consultation

Thank you for consulting the Building Conservation Team.

In relation to non-designated heritage assets, we would ask for clarification of policy BW&GB 11 – Heritage Assets please.

*“Non-designated assets including those listed in Appendix 1 will be conserved and enhanced and their character protected. A balanced judgement will be required about the effects of any development proposal on or close to such assets having regard to the scale of any harm or loss and the significance of the heritage asset. “*

In terms of the first part – would it be possible to confirm that this applies to development proposals please as there isn't statutory protection of non-designated heritage assets.

Regards

Matthew

---

**From:** Neighbourhood Planning Team <neighbourhoodplanning@herefordshire.gov.uk>  
**Sent:** 19 September 2019 12:01  
**Subject:** Bredenbury & District Group Regulation 16 submission neighbourhood development plan consultation

Dear Consultee,

Bredenbury & District Group Parish Council have submitted their Regulation 16 Neighbourhood Development Plan (NDP) to Herefordshire Council for consultation.

The plan can be viewed at the following link:

[https://www.herefordshire.gov.uk/directory\\_record/3035/bredenbury\\_and\\_district\\_group\\_neighbourhood\\_development\\_plan](https://www.herefordshire.gov.uk/directory_record/3035/bredenbury_and_district_group_neighbourhood_development_plan)

Once adopted, this NDP will become a Statutory Development Plan Document the same as the Core Strategy.

The consultation runs from 19 September 2019 to 31 October 2019.

If you wish to make any comments on this Plan, please do so by e-mailing:

[neighbourhoodplanning@herefordshire.gov.uk](mailto:neighbourhoodplanning@herefordshire.gov.uk) , or sending representations to the address below.

If you wish to be notified of the local planning authority's decision under Regulation 19 in relation to the Neighbourhood Development Plan, please indicate this on your representation.

Kind regards

**Herefordshire.gov.uk**

---

28 October 2019

Dear Sir / Madam

**Bredenbury and District Group Parish Council Neighbourhood Plan Consultation  
SUBMISSION ON BEHALF OF NATIONAL GRID**

National Grid has appointed Wood to review and respond to development plan consultations on its behalf. We are instructed by our client to submit the following representation with regards to the above Neighbourhood Plan consultation.

**About National Grid**

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales and National Grid Electricity System Operator (NGESO) operates the electricity transmission network across the UK. The energy is then distributed to the eight electricity distribution network operators across England, Wales and Scotland.

National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.

National Grid previously owned part of the gas distribution system known as 'National Grid Gas Distribution limited (NGGDL). Since May 2018, NGGDL is now a separate entity called 'Cadent Gas'.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect National Grid's assets.

**Specific Comments**

An assessment has been carried out with respect to National Grid's electricity and gas transmission apparatus which includes high voltage electricity assets and high-pressure gas pipelines.

National Grid has identified that it has **no record** of such apparatus within the Neighbourhood Plan area.



## Electricity Distribution

The electricity distribution operator in Herefordshire Council is Western Power Distribution. Information regarding the transmission and distribution network can be found at: [www.energynetworks.org.uk](http://www.energynetworks.org.uk)

## Appendices - National Grid Assets

Please find attached in:

- Appendix 1 provides a map of the National Grid network across the UK.

Please remember to consult National Grid on any Neighbourhood Plan Documents or site-specific proposals that could affect our infrastructure. We would be grateful if you could add our details shown below to your consultation database.

Lucy Bartley  
Consultant Town Planner

[n.grid@woodplc.com](mailto:n.grid@woodplc.com)

Wood E&I Solutions UK Ltd  
Nicholls House  
Homer Close  
Leamington Spa  
Warwickshire  
CV34 6TT

Spencer Jefferies  
Development Liaison Officer, National Grid

[box.landandacquisitions@nationalgrid.com](mailto:box.landandacquisitions@nationalgrid.com)

National Grid House  
Warwick Technology Park  
Gallows Hill  
Warwick  
Warwickshire  
CV34 6DA

I hope the above information is useful. If you require any further information, please do not hesitate to contact me.

Yours faithfully

[via email]

**Lucy Bartley**  
**Consultant Town Planner**

cc. Spencer Jefferies, National Grid



**APPENDIX 1: NATIONAL GRID'S UK NETWORK**

Where we operate  
Our UK network



**TO: DEVELOPMENT MANAGEMENT- PLANNING AND  
TRANSPORTATION  
FROM: ENVIRONMENTAL HEALTH AND TRADING  
STANDARDS**



**APPLICATION DETAILS**

291806 /

Susannah Burrage, Environmental Health Officer

I have received the above application on which I would be grateful for your advice.

The application form and plans for the above development can be viewed on the Internet within 5-7 working days using the following link: <http://www.herefordshire.gov.uk>

I would be grateful for your advice in respect of the following specific matters: -

	Air Quality		Minerals and Waste
	Contaminated Land		Petroleum/Explosives
	Landfill		Gypsies and Travellers
	Noise		Lighting
	Other nuisances		Anti Social Behaviour
	Licensing Issues		Water Supply
	Industrial Pollution		Foul Drainage
	Refuse		

Please can you respond by ..

**Comments**

Our comments are with reference to the potential impact on the amenity – in terms of noise, dust, odours or general nuisance to residential occupants that might arise as a result of any new residential development or any new commercial or industrial development. Please note that we have no observations with regard to this Neighbourhood Plan.

Signed: Susannah Burrage

Date: 15 October 2019

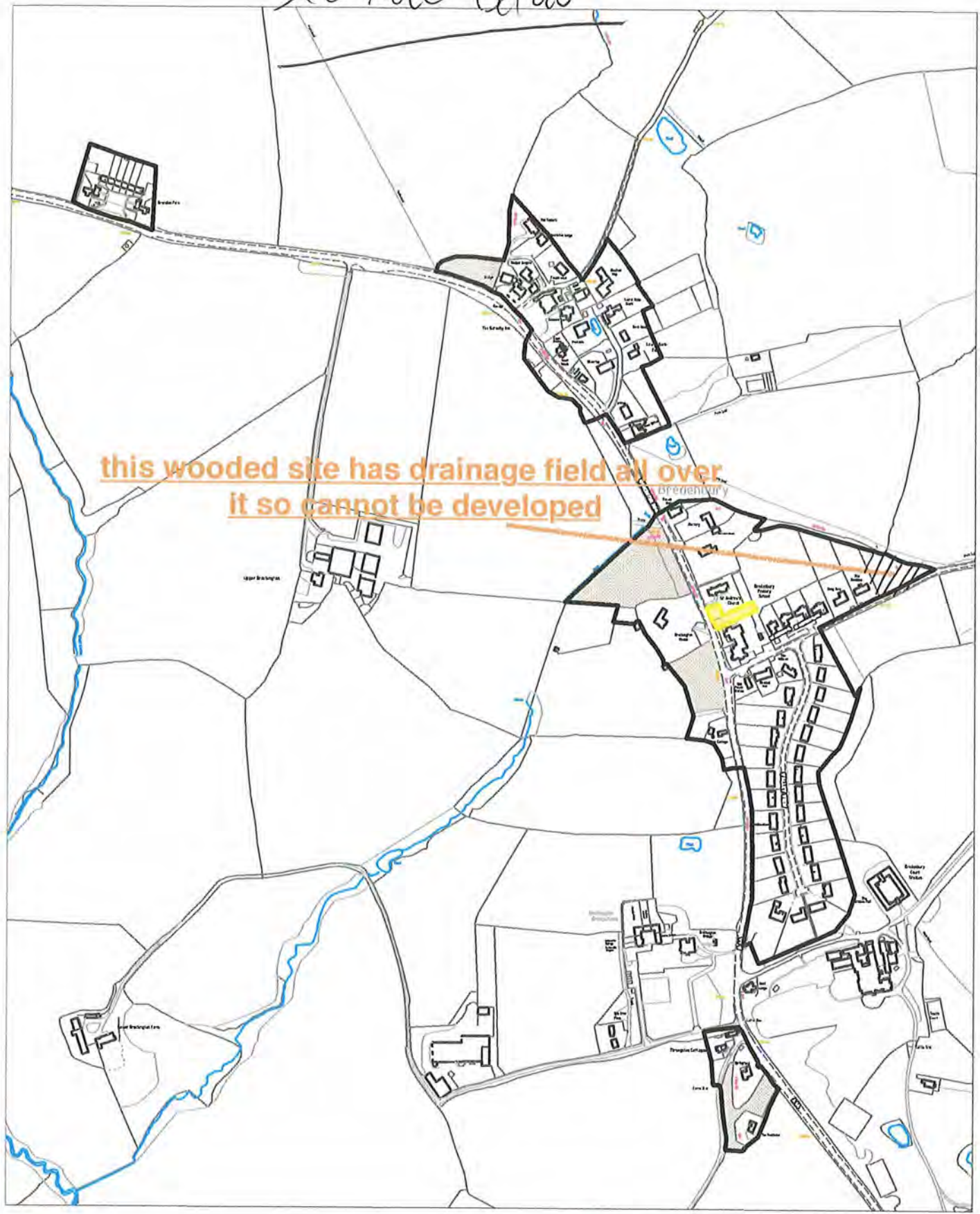
## Latham, James

---




**From:** Donotreply  
**Sent:** 24 September 2019 18:50  
**To:** Neighbourhood Planning Team  
**Subject:** A comment on a proposed Neighbourhood Area was submitted

Comment on a proposed neighbourhood plan form submitted fields	
Caption	Value
Address	
Postcode	
First name	Simon
Last name	Hale
Which plan are you commenting on?	The Bredenbury settlement boundary map
Comment type	Objection
Your comments	<p>The Bredenbury settlement map includes, an the easternmost end of St Andrews Close, a triangle of mature woodland. By including this woodland in the settlement, the door is open at some future date for it to be felled for housing. The woodland is important for shielding the housing from view, as well as important in its own right. Mature woodland should not be at risk; it's what makes our county so beautiful. There should be a strong presumption against felling trees which are our most important means of carbon capture. I would therefore like this triangle to be excluded from the settlement.</p>

See note Below



**this wooded site has drainage field all over  
it so cannot be developed**

-  Bredenbury Settlement Boundary (BW&GB4)
-  Additional Car Parking (BW&GB18)
-  Proposed Housing Sites (BW&GB4)

## Bredenbury settlement Policies Map

Scale 1:7,500  
at A4 size  




© Crown copyright and database rights [2019] Ordnance Survey 100024168  
Bredenbury & District Group Parish Council (Licensee) Licence Number: 100053367

## Neighbourhood Development Plan (NDP) – Core Strategy Conformity Assessment

From Herefordshire Council Strategic Planning Team

Name of NDP: Bredenbury & District Group- Regulation 16 submission draft

Date: 24/10/19

Draft Neighbourhood plan policy	Equivalent CS policy(ies) (if appropriate)	In general conformity (Y/N)	Comments
BW&GB1- Promoting a Sustainable Community	SS1	Y	
BW&GB2- Development Strategy	SS1; RA1; RA2; RA3; RA4; RA5; RA6	Y	
BW&GB3- The scale of new housing	SS2; RA2; RA3	Y	Very minor suggestion just for completeness- para 4.2.6 could also refer to H2 as well as RA3 concerning Rural Exceptions Sites.
BW&GB4- Housing Allocations	RA2	Y	
BW&GB5- Housing in the Countryside	RA3; RA4	Y	Original comment made at regulation 14- <i>final paragraph regarding the removal of PD rights may be better placed within the extensions policy that follows?</i>
BW&GB6- Extensions to Dwellings	SS1; SD1	Y	
BW&GB7- Design of new housing	SS1; SS6; LD1; LD2; LD3; LD4; SD1; SD2; SD3; SD4	Y	Original comment made at regulation 14- <i>See general comment at the end.</i>
BW&GB8- Ensuring an appropriate range of tenures, types and	H1; H2; H3	Y	Original comment made at regulation 14- <i>On smaller developments, for instance</i>

Draft Neighbourhood plan policy	Equivalent CS policy(ies) (if appropriate)	In general conformity (Y/N)	Comments
sizes of houses			<p><i>single plots/self-build, it may not prove to be appropriate or enforceable to restrict dwelling sizes to 2/3 bedrooms.</i></p> <p><i>A suggestion would be that the larger site allocations would instead seek such criteria, where economies of scale would make this a more viable and deliverable proposal.</i></p> <p>If this is indeed what is meant by the policy, this should be made clear. As currently worded, it seems to suggest that all new residential development, regardless of whether or not it is small scale, would be covered by this criteria.</p>
BW&GB9- Affordable Housing	H1; H2	Y	
BW&GB10- Protecting and Enhancing Local Character	SS6; LD1; LD2; LD3; LD4	Y	
BW&GB11- Heritage Assets	SS6; LD4	Y	Original comment made at regulation 14- <i>See general comment at the end.</i>
BW&GB12- Broadband & mobile telephone infrastructure	ID1; SD1	Y	
BW&GB13- Renewable Energy	SS1; SS7; SD2	Y	
BW&GB14- Transport & Connectivity	SS4; MT1	Y	
BW&GB15- Business	SS5; RA5;	Y	Original comment made at

<b>Draft Neighbourhood plan policy</b>	<b>Equivalent CS policy(ies) (if appropriate)</b>	<b>In general conformity (Y/N)</b>	<b>Comments</b>
development	RA6; E1; E2; E3; E4		regulation 14- <i>See general comment at the end.</i>
BW&GB16- Protection of existing commercial business premises	SS5; E2	Y	
BW&GB17- Agriculture and Forestry enterprises	SS5; RA4; RA6	Y	
BW&GB18- Enhanced Services and Facilities for the Community	SC1	Y	Original comment made at regulation 14- <i>Referred to in general comment at the end.</i>
BW&GB19- Protection and enhancement of Community Facilities	SC1	Y	Original comment made at regulation 14- <i>Referred to in general comment at the end.</i>
BW&GB20- Open Spaces	OS1; OS2; OS3	Y	Original comment made at regulation 14- <i>See general comment at the end.</i>

**Other comments/conformity issues:**

Original comments made at Regulation 14 standing: *Whilst this plan conforms generally well with the Core Strategy, there are some policies which are quite generic in their criteria, and do little to supplement their equivalents in the Core Strategy. Producing an NDP affords local communities the opportunity to tailor planning policies exclusively to their local area, to supplement those in the county wide Local Plan rather than duplicate the same criteria. There are some examples also of where this has been successfully done, in particular 18 and 19. However in other cases, there is noted absence of this, and I would consider that without acting as a supplement to the Core Strategy, their inclusion may not be strictly necessary, as the policy issue in question has been already covered sufficiently by the CS.*