

Latham, James

From: Turner, Andrew
Sent: 23 July 2018 15:43
To: Neighbourhood Planning Team
Subject: RE: Almeley Regulation 16 neighbourhood development plan consultation

Follow Up Flag: Follow up
Flag Status: Completed

RE: Almeley 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:

1. A review of Ordnance survey historical plans indicate the proposed housing development site '[Policy ALM11: Land to north of West View](#)' indicated in light brown on the 'Almeley village policies map', has no previous historic potentially contaminative uses.
2. '[Policy ALM13: Redevelopment of Land at Woonton Farm](#)' as indicated in grey on the 'Woonton policies map'.

This proposed 'housing development' site appears from a review of Ordnance survey historical plans to have historically been used as orchards. By way of general advice I would mention that orchards can be subject to agricultural spraying practices which may, in some circumstances, lead to a legacy of contamination and any development should consider this.

3. I would also advise the following regarding the proposed development sites; '[Policy ALM13: Redevelopment of Land at Woonton Farm](#)' & '[Policy ALM14: Residential Use Associated with Historic Farmsteads](#)'
 - Some farm buildings may be used for the storage of potentially contaminative substances (oils, herbicides, pesticides) or for the maintenance and repair of vehicles and machinery. As such it is possible that unforeseen contamination may be present on the site. Consideration should be given to the possibility of encountering contamination on the site as a result of its former uses and specialist advice be sought should any be encountered during the development.
 - And regarding sites with a historic agricultural use, I would also mention that agricultural practices such as uncontrolled burial of wastes or excessive pesticide or herbicide application may be thought of as potentially contaminative and any development should consider this.

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

Herefordshire.gov.uk

Andrew Turner
Technical Officer (Air, Land & Water Protection)
Economy, Communities & Corporate Directorate,
Herefordshire Council
8 St Owens Street,
Hereford.
HR1 2PJ

Direct Tel: 01432 260159

Email: aturner@herefordshire.gov.uk



 Please consider the environment - Do you really need to print this e-mail?

Any opinion expressed in this e-mail or any attached files are those of the individual and not necessarily those of Herefordshire Council. This e-mail and any files transmitted with it are confidential and intended solely for the use of the addressee. This communication may contain material protected by law from being passed on. If you are not the intended recipient and have received this e-mail in error, you are advised that any use, dissemination, forwarding, printing or copying of this e-mail is strictly prohibited. If you have received this e-mail in error, please contact the sender immediately and destroy all copies of it.

From: Neighbourhood Planning Team

Sent: 27 June 2018 10:35

Subject: Almeley Regulation 16 neighbourhood development plan consultation

Dear Consultee,

Almeley Parish Council have submitted their Regulation 16 (2nd Re-submission) 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/3022/almeley_neighbourhood_development_plan

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

The consultation runs from 27 June 2018 to 22 August 2018.

17 August 2018

Your Ref:

Our Ref:

12-049-09

Neighbourhood Planning Team
Herefordshire Council
Planning Services
Plough Lane
PO Box 230
HR1 2ZB

Dear Sirs

Re: Almeley Neighbourhood Development Plan

I write on behalf of Mr J Mokler of [REDACTED] with regard to the November 2017 Consultation Draft of the Almeley Parish Neighbourhood Development Plan (2011-2031).

By way of background information, I wrote on Mr Mokler's behalf to Mr Glyn-Jones (who was at one time assisting in the preparation of the Almeley UDP) back in April 2016, proposing other land in Mr Mokler's ownership as a future development site. However, I also drew attention (in the penultimate paragraph of that letter – attached) to the fact that Mr Mokler had been pursuing planning permission on land to the east of The Manor in accord with conclusions reached within the Inspector's Report upon the Herefordshire Unitary Development Plan (see attached), and suggested that this land needed to be included within the Settlement Boundary in order to adhere to the Inspectors conclusions.

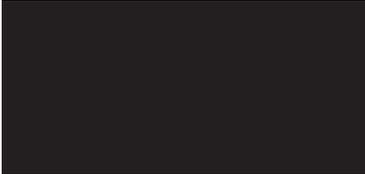
I note that the Almeley Village Proposals Map (page 52) still omits this land despite the clear conclusion of the UDP Inspector within Paragraph 5.40.7 of his report, that this land should be included within the Settlement Boundary. This directly contradicting his comment within paragraph 5.40.8, that the Settlement Boundary should be amended "*as soon as priorities allow*" to include this land.

As you are aware, the preparation of the Almeley NDP is, for all intents and purposes, the first opportunity for a revision of the Settlement Boundary to be implemented. Furthermore, and despite publication and recent revision of the National Planning Policy Framework, there have been no material changes or amendment of the fundamental planning policy considerations against which the UDP Inspector made his assessment, which would warrant a different conclusion to now be reached.



The above in mind, I therefore wish to formally register an objection to the plan in its current form as it is my assertion that the Settlement Boundary, and any projected housing delivery numbers for Almeley, will require amendment in order to adhere to the UDP Inspector's conclusions.

Yours sincerely



Bernard Eacock DipTP MRTPI
Director

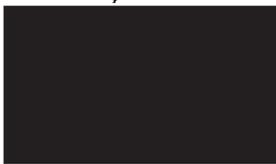
8 April 2016

Your Ref:

Our Ref:

16-009-01

Mr J Glyn-Jones



Dear Mr Glyn-Jones

Re: Almeley Neighbourhood Development Plan

I write further to our telephone conversation some weeks ago in respect to the land owned by Mr John Mokler to the south of Mountain View, Almeley.

I attach a plan identifying the land in Mr Mokler's ownership (edged red) and the area of land he would like to seek development on (hatched green) at some time in the future. I would be grateful for your thoughts/comments on the prospect of such a development in the context of the draft Almeley Neighbourhood Development Plan.

Mr Mokler's aspirations are for a modest development of 3 – 5 units as a continuation of Mountain View. As you may know, Mr Mokler formerly owned all of the land now occupied by Mountain View which was developed by a Registered Social Landlord to provide affordable housing for local people.

You will appreciate that at this time, this is merely a notional number of units as a full feasibility assessment of the land/site will need to be undertaken before things could be 'firmed up'. This would more than likely include an Ecological Survey of the site and surroundings, a Heritage Assessment of any impact upon The Manor (Grade II*) and the wider Conservation Area.

Development of this site would represent a natural extension of the village in a central location. As such, it is my view that this location is 'sustainable' and, aside from any impact upon 'The Manor' (which needs to be fully considered at the appropriate stage) there is scope for a development without causing undue harm to visual or residential amenity.

Finally, I thought it appropriate to draw your attention to Mr Mokler's future intention for the small paddock to the east of The Manor (hatched blue). As you know, Mr Mokler has sought planning permission for 2 dwellings on this land under local planning authority references (P140977/F & P143462/F). The applications to develop this land have been made under the premise of the Inspectors Report on the former Unitary Development Plan (enclosed). To summarise, the Inspector concluded that the *"the boundary of the village in this location is deserving of review"* and *"as soon as priorities will allow, the Council should review the settlement boundary of Almeley"* to include this land.

If you have any questions or queries, please do not hesitate to contact me.

Yours sincerely

Bernard Eacock DipTP MRTPI
Director

Encs

Almeley

The Manor House and land to the east – 1037, 1040, 1041

- 5.40.5 When looking from the east towards the objection site, I gained the distinct impression that the natural built-up limits of Almeley extend beyond Church Terrace to include Stable Lodge and Almeley Manor. In particular, the stone wall forming the southern elevation of Stable Lodge and that in front of the manor house draw they eye west and, together with the buildings themselves, clearly indicate a continuation of development along the lane.
- 5.40.6 I am aware that my observations suggest a boundary in a location different from that determined by others. In this regard, and at the time of my site visit, the hedge in front of the objection site and the gap represented by the land itself did not strike me as prominent features in the street scene. It is the buildings and boundary treatment further to the west that are demonstrative of continuing development and which are of greater dominance.
- 5.40.7 To my mind, the boundary of the village in this location is deserving of review. The precise line of an alternative boundary has not been debated. For example, it could be argued that inclusion of the garden land west of but within the curtilage of Almeley Manor should not be included within the settlement boundary. In addition, I make no comments on the suitability of the objection site for development purposes.
- 5.40.8 Modification of the boundary at this late stage could attract objections and delay adoption of the Plan. This would not necessarily be in the public interest. In the circumstances, and as soon as priorities will allow, the Council should review the settlement boundary of Almeley in an early development plan document. In the interim, and without prejudice to site specific matters, my comments in this section would be material considerations in the determination of any planning application.



The Coal
Authority



INVESTOR IN PEOPLE



RTPI
Learning Partner

200 Lichfield Lane
Berry Hill
Mansfield
Nottinghamshire
NG18 4RG

Tel: 01623 637 119 (Planning Enquiries)

Email: planningconsultation@coal.gov.uk

Web: www.gov.uk/coalauthority

For the Attention of: Neighbourhood Planning and Strategic Planning
Herefordshire Council

[By Email: neighbourhoodplanning@herefordshire.gov.uk]

18 July 2018

Dear Neighbourhood Planning and Strategic Planning teams

Almeley Neighbourhood Plan - 2nd Resubmission

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: 03 August 2018 09:23
To: Neighbourhood Planning Team
Cc: Evans Rhys
Subject: RE: Almeley Regulation 16 neighbourhood development plan consultation

Follow Up Flag: Follow up
Flag Status: Completed

Dear Sir/Madam,

I refer to the below consultation and would like to thank you for allowing Welsh Water the opportunity to respond.

As you may be aware, the Parish Council consulted us at the Regulation 14 stage and as such we provided a consultation response at this stage. To summarise, we have no issues with the content of the Neighbourhood Plan and welcome the references to the public sewerage network, in particular the provisions of policy ALM17.

Should you require any further information, then please do not hesitate to contact us.

Kind regards,



Ryan Norman
Forward Plans Officer | Developer Services | Dwr Cymru Welsh Water
Linea | Cardiff | CF3 0LT | T: 0800 917 2652 | 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 [mailto:neighbourhoodplanning@herefordshire.gov.uk]
Sent: 27 June 2018 10:35
Subject: Almeley Regulation 16 neighbourhood development plan consultation

***** External Mail *****

Dear Consultee,

Almeley Parish Council have submitted their Regulation 16 (2nd Re-submission) 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/3022/almeley_neighbourhood_development_plan

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

The consultation runs from 27 June 2018 to 22 August 2018.

Herefordshire Council
Neighbourhood Planning
Plough Lane
Hereford
HR1 2ZB

Our ref: SV/2018/109876/OR-
12/PO1-L01

Your ref:

Date: 22 August 2018

F.A.O: Mr. James Latham

Dear Sir

ALMELEY REGULATION 16 NEIGHBOURHOOD PLAN

I refer to your email of the 27 June 2018 in relation to the above Neighbourhood Plan (NP) consultation. We have reviewed the submitted document and would offer the following comments at this time.

As part of the adopted Herefordshire Council Core Strategy updates were made to both the Strategic Flood Risk Assessment (SFRA) and Water Cycle Strategy (WCS). This evidence base ensured that the proposed development in Hereford City, and other strategic sites (Market Towns), was viable and achievable. The updated evidence base did not extend to Rural Parishes at the NP level so it is important that these subsequent 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.

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). I trust the above is of assistance at this time.

Yours faithfully

Mr. Graeme Irwin
Senior Planning Advisor

Environment Agency
Hafren House, Welshpool Road, Shelton, Shropshire, Shrewsbury, SY3 8BB.
Customer services line: 03708 506 506
www.gov.uk/environment-agency

Cont/d..

Direct dial: 02030 251624

Direct e-mail: graeme.irwin@environment-agency.gov.uk



54 High Street
Kington
Herefordshire
HR5 3BJ

Tel: 01544 230316 Fax: 01544 230860
E mail: avril@mccartneys.co.uk

Neighbourhood Planning Team
Planning Services
Herefordshire Council
P O Box 4
Hereford HR1 2ZB

Our ref : MRE/RAL/5184
21st August 2018

By email only: neighbourhoodplanning@herefordshire.gov.uk

Dear Sirs

Re: Almeley Parish Neighbourhood Development Plan 2011-2031 - Submission Draft Plan

On behalf of our client, Mr. J. Mills, [REDACTED] we wish to object to the Almeley Parish Neighbourhood Development Plan, referred to above, specifically in relation to the omission within the development boundary of the Land at Woonton, situated to the south west of The Orchards, which has been granted planning permission.

We refer to Herefordshire Council Planning reference: 173699. This application was for the proposed residential development of five dwellings, including formation of vehicular access, provision of an orchard and coppice strips, foul drainage treatment plants, and other associated works. Herefordshire Council granted this application on 27th June 2018.

With reference to Planning Policy ALM12: Housing Development in Woonton. The policy clearly states, "the retention of sites already granted planning permission", therefore, the above site should be included as a commitment site within the proposed settlement boundary of the Woonton Policies Map.

Our client, therefore, wishes to object to the Submission Draft Plan, as proposed and set out above, as planning permission has already been granted for this site, and the Almeley Parish Neighbourhood Development Plan 2011-2031 is a draft submission and has not been formally adopted.

We should be grateful if you would acknowledge receipt of this letter, confirming our client's objection to the Submission Draft Plan in its current form.

We look forward to hearing from you.



For and on behalf of McCartneys LLP

McCartneys is the trading name of McCartneys LLP which is a Limited Liability Partnership • Registered in England & Wales, Number: OC310186 • Service by email or fax is not accepted

REGISTERED OFFICE: McCartneys LLP, The Ox Pasture, Overton Road, Ludlow, Shropshire SY8 4AA

MEMBERS: Chairman: GR Owens FRICS, FAAV, FLAA • CC Roads FLAA • MR Edwards MRICS, FNAEA, FCIOB • CW Jones FAAV, FLAA • GR Wall MRICS, MBIAC, FAAV, FLAA • JG Williams BSc (Hons) MRICS
JM Layton Mills BSc (Hons) MRICS, FAAV, FLAA • DA Hughes BSc, MRICS, MCIOB • DA Anderson MNAEA, MARLA • TW Carter BSc (Hons) MRICS, MNAEA • M Kelly • MW Thomas ALAA, MNAEA
N Millinchip DipSurvPract, MNAEA • ZE Herbert DipREA, FNAEA • SW Edwards BA (Hons) PGDipSurv, MRICS, IRRV (Hons) • MA Fish • KH Morris BSc (Hons), MRICS, FAAV • JM Tulloch MNAEA, MICBA

ASSOCIATE MEMBERS: A Kirk • GO Jones BSc (Hons), MRICS • PP Blackman-Howard ANAVA

PARTNERSHIP SECRETARY: D Hulland

CONSULTANTS: LD Thomas FRICS, FAAV • TW Jones FRICS • RR Williams BSc, FRICS • CJ Smith FRICS • J Uffold BSc (Hons) MRICS, FAAV, FLAA, MNAEA

REGIONAL OFFICES: Brecon, Bridgnorth, Bulth Wells, Craven Arms, Hay-on-Wye, Kidderminster, Kington, Knighton, Llandrindod Wells, Ludlow, Newtown, Presteigne, Rhyader, Stourport-on-Severn, Tenbury Wells, Welshpool, Worcester and associated office in Mayfair, London.

    www.mccartneys.co.uk



CHARTERED SURVEYORS • AUCTIONEERS • VALUERS • LAND & ESTATE AGENTS • FINE ART AUCTIONEERS

Latham, James

From: Knight, Matthew
Sent: 28 June 2018 10:19
To: Neighbourhood Planning Team
Subject: RE: Almeley Regulation 16 neighbourhood development plan consultation

Follow Up Flag: Follow up
Flag Status: Completed

Thank you for consulting the Historic Environment Team.

Comments are:

- When looking at Registered Parks and Gardens, rather than looking at wording such as development which adversely affects a Registered Park and Garden, should this be development which adversely affects the (significance?) of registered parks and gardens? The Landscape Team may be able to provide advice on this aspect of the NDP

Regards

Matthew

Herefordshire.gov.uk

Matthew Knight RIBA
Principal Building Conservation Officer
01432 260321
matthew.knight@herefordshire.gov.uk

Plough Lane
Hereford
HR4 0LE



From: Neighbourhood Planning Team
Sent: 27 June 2018 10:35
Subject: Almeley Regulation 16 neighbourhood development plan consultation

Dear Consultee,

Almeley Parish Council have submitted their Regulation 16 (2nd Re-submission) 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/3022/almeley_neighbourhood_development_plan

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

The consultation runs from 27 June 2018 to 22 August 2018.

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

neighbourhoodplanning@herefordshire.gov.uk, or sending representations to the address below.

Neighbourhood Planning and Strategic Planning teams
Herefordshire Council
Plough Lane
Hereford
HR4 0LE

Hannah Lorna Bevins
Consultant Town Planner

Tel: 01926 439127
n.grid@amecfw.com

Sent by email to:
neighbourhoodplanning@herefordshire.gov.uk

29 June 2018

Dear Sir / Madam

Almeley 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 owns and operates the high voltage electricity transmission system in England and Wales and operate the Scottish high voltage transmission system. National Grid also owns and operates the gas transmission system. In the UK, gas leaves the transmission system and enters the distribution networks at high pressure. It is then transported through a number of reducing pressure tiers until it is finally delivered to our customers. National Grid own four of the UK's gas distribution networks and transport gas to 11 million homes, schools and businesses through 81,000 miles of gas pipelines within North West, East of England, West Midlands and North London.

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 our 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, and also National Grid Gas Distribution's Intermediate and High Pressure apparatus.

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

Key resources / contacts

National Grid has provided information in relation to electricity and transmission assets via the following internet link:

<http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/>

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

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:

Gables House
Kenilworth Road
Leamington Spa
Warwickshire CV32 6JX
United Kingdom
Tel +44 (0) 1926 439 000
woodplc.com

Wood Environment
& Infrastructure Solutions UK Limited
Registered office:
Booths Park, Chelford Road, Knutsford,
Cheshire WA16 8QZ
Registered in England.
No. 2190074



Hannah Lorna Bevins
Consultant Town Planner

n.grid@amecfw.com

Wood E&I Solutions UK Ltd
Gables House
Kenilworth Road
Leamington Spa
Warwickshire
CV32 6JX

Spencer Jefferies
Development Liaison Officer, National Grid

box.landandacquisitions@nationalgrid.com

National Grid House
Warwick Technology Park
Gallows Hill
Warwick
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]

Hannah Lorna Bevins
Consultant Town Planner

cc. Spencer Jefferies, National Grid



Herefordshire Council
Plough Lane
Hereford
HR4 0LE

Your ref:
Our ref:
Email: Sarah.faulkner@nfu.org.uk
Direct line: 01952 409247
Date: 06 August 2018

Dear Sir,

ALMELEY NEIGHBOURHOOD PLAN - AGRICULTURAL DEVELOPMENT AND MANURE SPREADING

The National Farmers Union has been contacted by concerned farmer members regarding the Almeley Neighbourhood Plan. The consultation for this document ended in April 2018 and we were not aware of it at the time. The NFU notes that, under Regulation 14 and Schedule 1 of the Neighbourhood Planning (General) Regulations 2012, there is a requirement to consult with various “consultation bodies”, including *bodies which represent the interests of persons carrying on business in the neighbourhood area*. The plan itself recognises that agriculture is one of the main types of business in the area, yet the NFU, one of the largest representative bodies in this area, was not consulted. The NFU, therefore, questions whether the consultation requirements have been properly complied with.

Having read the document we have a number of significant concerns about its content and query whether it is in alignment with local and national planning policy. It has the potential to unduly restrict the growth of farm businesses and curtail their ability to comply with legislation through the delivery of infrastructure for environmental management or animal welfare.

The document has some very supportive statements about supporting agricultural businesses in the early pages and we welcome the fact that the importance of the industry to the local area is cited within the plan. However we are extremely concerned by policy ALM 9 as in its current form it would create a number of barriers agricultural development. It is a duplication of Environment Agency activity regarding agricultural regulation. We are also concerned that it has included reference to general purpose agricultural buildings.

Many of our concerns relate to the comments about manure spreading. Animal manures are a valuable resource of organic matter and play a key role in the physical, chemical and biological processes which underpin soil health. Manures build fertility by providing a valuable source of organic nutrient. This will allow the recipient farmland to reduce its reliance on artificial fertilisers, thereby reducing the carbon footprint of food production.

Our specific concerns about Policy ALM9 are:

C – The definition of residential amenity is unclear. It would also be helpful to know how the distances stated have been determined.

i) – This section refers to manure spreading and is currently unclear. It suggests that manure should be spread on land that is under the applicant’s own control and in a location where this would not adversely affect residential amenity. It is not clear what the document means when it refers to land under an applicant’s own control. For many farmers it will not always be practical to spread manures and slurry on land within their control. It is relatively common practice for manure to be exported to neighbouring farms. Farm land is also held under a variety of tenancies and licences and clarification is required. We query the definition of residential amenity as manure spreading on land is a vital part of agricultural management. Furthermore we do not know what is meant by a “purification system” or how this impacts upon the suitability of land? This is potentially a duplication of existing EA regulation.

ii) - BPEO appears to be a tool designed to aid Waste Management Strategy development and is often used in municipal waste planning. As far as we are aware it is not intended for use on farm and the inclusion of it here is inappropriate.

iii) –Manure spreading can be carried out on agricultural land, as a normal part of agricultural activities, without planning permission. There is no available data on where manure spreading takes place, and manure from a farm may be spread on different areas each year, depending on cropping cycles, nutrient needs etc. It is, therefore, impossible for farmers to carry out an in-combination assessment of manure spreading activities (as well as it going beyond what is legally required) as there is no data available to allow them to consider what other farms in the area may be doing. Further, there are numerous obligations which farmers have to comply with to control nutrient run-off, including Nitrate Vulnerable Zone requirements (where relevant) and the Farming Rules for Water, and these provisions can be used to provide the required environmental safeguards. This requirement should, therefore, be removed from the plan.

Scheduled Ancient Monuments will be subject to their own management agreements which may include manure application? We have not come across concerns about manure spreading on archaeology before so question how it is relevant. Again, we consider that this should be removed from the plan.

iv) – We are very concerned by this section as manure spreading is outside of the scope of the planning system and therefore object to its inclusion. The phrase “disposal of waste manure” is inappropriate language as manure is not classed as a waste when spread to land. Considering manure to be a waste when it’s being used as a fertiliser is an error which undermines this plan.

ALM 9 refers to “sites and species of local importance to nature conservation in Almeley parish” This statement is very wide in scope and therefore would be unduly restrictive.

- We do not believe it is reasonable or proportionate to restrict manure spreading on land abutting or within a conservation area. Manure spreading is a fundamental part of agricultural land management and is vital to support crop (including grass) growth by returning sustainable nutrients to the land.

Vi) – We are very concerned by this section as it seeks to layer additional constraints upon agricultural manure spreading. It is not clear what sort of evidence would be required and as we have stated above activities would change each year depending on cropping plans. Furthermore manure application is regulated by the Environment Agency. Vii) – Agricultural developments are not likely to be covered by waste management licensing, conditions and therefore clarification is required about what this would mean in practice.

7.5 – It is not clear which Defra guidance is referred to here.

7.6 – Livestock manure is not a commercial waste product. Therefore this is a significant error and should be amended.

I hope that you find our comments on this document useful and trust that you will not approve the plan until there is sufficient evidence that the NFU's views, as a representative of one of the largest business sectors in the area covered by the proposed plan, have been taken into account.

I would be grateful if someone could contact us urgently regarding this document. We are keen to work with the Council and the Parish Council and work with you to find a solution to our members' concerns. Therefore please could you contact me at the West Midlands Regional Office.

Yours sincerely

Sarah Faulkner
Environment and Rural Affairs Adviser

CC. Almely Parish Council....

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



APPLICATION DETAILS

259806 /
Almeley, HR3 6NE
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.

We have no observations or comments to make with regard to the Regulation 16 consultation for the Neighbourhood Plan for Almeley.

Signed: Susannah Burrage
Date: 22 August 2018

Neighbourhood Development Plan (NDP) – Core Strategy Conformity Assessment

From Herefordshire Council Strategic Planning Team

Name of NDP: Almeley- Regulation 16 submission draft

Date: 09/07/18

Draft Neighbourhood plan policy	Equivalent CS policy(ies) (if appropriate)	In general conformity (Y/N)	Comments
ALM1- Promoting Sustainable Development	SS1	Y	
ALM2- Development Strategy	SS1; SS2; RA2; RA3; RA4; RA6	Y	
ALM3- Maintaining and Protecting the Landscape and its Features	SS6; LD1; LD2	Y	
ALM4- Protecting Heritage Assets	SS6; LD4	Y	
ALM5- Protection of Local Green Space	SS6; OS3	Y/N	<p>“The Batch” may not considered appropriate for the Local Green Space designation. Given its scale, it could be considered as an extensive tract of land, which would fail to comply with the criteria of paragraph 77 in the NPPF.</p> <p>It is noted that the site already benefits from designation as a Local Wildlife Site, and part of the Conservation Area. With these considered, development in any case would be highly unlikely to be permitted here, and therefore the overall necessity of affording it the Local Green Space designation is questionable.</p>

Draft Neighbourhood plan policy	Equivalent CS policy(ies) (if appropriate)	In general conformity (Y/N)	Comments
ALM6- Design Appearance	SS6; LD1; LD2; SD1	Y	
ALM7- Sustainable Design	SS1; SS6; SD1; SD2; SD3; SD4	Y	
ALM8- Diversification through Live/Work Units	SS1, RA5, RA6, E3	Y	
ALM9- General Purpose Agricultural Buildings and Intensive Livestock Units	SS1; SS6; RA6	Y	
ALM10- Housing Development in Almeley	SS1; SS2; RA2; H3; MT1; LD1; LD4; SD1	Y	
ALM11- Land to North of West View	SS1, RA2, H3, MT1, LD1, LD2, SD1	Y	It should be noted that the 2012 SHLAA considered the allocated site to be highly constrained due to its sloping nature.
ALM12- Housing Development in Woonton	SS1; SS2; RA2; MT1; LD1; LD4; SD1; SD3; SD4	Y	
ALM13- Redevelopment of Land at Woonton Farm	SS1, MT1, LD1, LD4, SD1, SD3, SD4	Y	
ALM14- Residential Use Associated with Historic Farmsteads	SS1; RA3; RA4; RA5; H2	Y/N	It is not clear whether this policy is inclusive of encouraging the conversion of existing redundant farmstead buildings. If this is the case, the buildings in question

Draft Neighbourhood plan policy	Equivalent CS policy(ies) (if appropriate)	In general conformity (Y/N)	Comments
			must be demonstrably capable of conversion through a structural survey (in accordance with RA5). It must also be capable of accommodating the proposed uses without the need for substantial alteration, extension, ancillary buildings, areas of hard standing or other development which would have adverse impacts.
ALM15- Providing for Local Housing Need	SS1; SS3; H1; H3	Y	
ALM16- Highway Requirements	SS1; SS4; MT1	Y	
ALM17- Sewage and Sewerage Infrastructure	SS6; SD4	Y	
ALM18- Protection from Flood Risk	SS7; SD3	Y/N	<p>Buildings used for dwelling houses are classified in national planning guidance as “more vulnerable” with regard to flood risk vulnerability. It could therefore be permissible in flood zone 2 areas, with such proposals in zone 3a being subject to the Exception Test:</p> <p>https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/575184/Table 3 - Flood risk vulnerability and flood zone compatibility .pdf</p>

Draft Neighbourhood plan policy	Equivalent CS policy(ies) (if appropriate)	In general conformity (Y/N)	Comments
ALM19- Protection and Enhancement of Community Facilities and Services	SS1; SC1	Y	
ALM20- Contributions to Community Services, Youth Provision, and Recreation Facilities	SC1	Y	



Historic England

WEST MIDLANDS OFFICE

Ms Emma Thomas
Almeley Parish Council
c/o Parish Clerk

Direct Dial: 0121 625 6887

Our ref: PL00318602

13 August 2018

Dear Ms Thomas

ALMELEY NEIGHBOURHOOD PLAN - REGULATION 16 CONSULTATION

Thank you for the invitation to comment on the submission draft Neighbourhood Plan. Our earlier Regulation 14 comments remain entirely relevant. That is:

“Historic England is supportive of 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 green space, buildings, historic farmsteads and landscape character including key views and archaeological remains is to be applauded”.

Overall Historic England considers that the plan reads as a very comprehensive, well written and 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.

I hope you find these comments and advice 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 6870
HistoricEngland.org.uk



Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.

