



Historic England

WEST MIDLANDS OFFICE

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: PL00468715

20 August 2018

Dear Mr Latham

OCLE PYCHARD; BURGHILL; BORDER GROUP AND LEA NEIGHBOURHOOD PLANS- HRA CONSULTATIONS

Thank you for your consultation and the invitation to comment on the HRA Documents for the above Neighbourhood Plans.

For the purposes of such consultations, Historic England confines its advice to the question, "Is it likely to have a significant effect on the environment?" in respect of our area of concern, cultural heritage.

In this context and regarding HRA Historic England does not disagree with your conclusions but is happy to defer to the opinions of the other statutory consultees. I trust the above comments will be of help in taking forward the Neighbourhood Plans.

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



Latham, James

From: Banks, Samantha
Sent: 20 September 2018 14:20
To: Latham, James
Subject: FW: Burghill NDP HRA 'on consultation'

-----Original Message-----

From: Michael White
Sent: 04 September 2018 10:02
To: Banks, Samantha <Samantha.Banks2@herefordshire.gov.uk>
Subject: Burghill NDP HRA 'on consultation'

Good morning, Samantha,

I have managed to discover that the HRA is "on consultation" until 10th September. (I wonder just how many in Burghill will know of its existence?)

Some of the information given is, in my opinion, either erroneous, misleading or at least debatable. The errors need correcting or clarifying. Please let me point out these.

1) Quote: "The plan is a criterior-based document but does have 7 site allocations...." Aren't there THREE site allocations....namely Site 10, Site 25 and Site 21?

2) Quote: "...these sites are WITHIN the level of growth proposed within the Core Strategy" Whether it is 7 sites or 3 sites the CS requires 18% of 689 = 124 additional dwellings, but 124 dwellings have already been given planning permission!! The submission NDP includes 8 + 6 + 10 = 24 dwellings allocated to the 3 sites. These are over and above the CS target....therefore: they will.... "BE IN EXCESS of the level of growth proposed within the CS".... i.e. 21.4%....not 18%. So, 'IN EXCESS', rather than 'WITHIN'

3) Quote: Para 8.4from Welsh Water's comments "....sufficient headroom at present" Appendix 3 of the HRA refers to site 10 and site 25 (14 dwellings) "Welsh Water has indicated sufficient headroom at present". But ALL THESE DWELLINGS will be on septic tanks or boreholes as there IS NO MAINS DRAINAGE in Tillington.

In summary: There is excessive development within the NDP and 60% of the excess is 'off sewer' in Tillington. On top of all this is the fact that this area of Tillington has been erroneously classified as 'for development as a '4.14' (80+ dwellings!!!) settlement.

I feel very strongly that the Examiner should be aware of these discrepancies and errors. It is vital that she/he has all the facts, I hope you will agree.

On a final point regarding the Burghill NDP, I feel that a letter, written as an open letter to the Examiner, after the NDP was submitted, is intended to undermine comments made by parishioners and to influence the report of the Examiner. This is totally unethical. It sets out to infer to the Examiner that comments made by the residents of the parish are incorrect. The letter (the last time I looked) is anonymous, but to anyone with a few brain cells it is clear who the author is. If you could provide me with details of how this last message can reach the Examiner, I would be very grateful.

best regards

Latham, James

From: Banks, Samantha
Sent: 20 September 2018 14:20
To: Latham, James
Subject: FW: Burghill NDP - updated Habitats Regulations Assessment

From: David King
Sent: 06 September 2018 11:48
To: Banks, Samantha <Samantha.Banks2@herefordshire.gov.uk>
Subject: Burghill NDP - updated Habitats Regulations Assessment

Dear Mrs Banks

We have been in contact before and you may recall that I previously said that I spent many hours as a member of the now-defunct Steering Group for the Burghill Area Neighbourhood Plan and retain a keen interest in its outcome.

I see that the updated Habitats Regulations Assessment final report is on consultation until 10 September 2018. It is unclear how one is supposed to respond to that so I am responding to you directly.

I note that there at least a couple of factual inaccuracies in the latest HRA which need correction. I doubt that the Qualifying Body has read it so I point these out now:

1. Para 6.4 states that the plan has 7 site allocations and that "the inclusion of these sites are still within the level of growth proposed within the Core Strategy."
This is incorrect for 2 reasons:
 - a. In the latest attempt at a plan, **there are 3 site allocations** not 7. They are Site 10, Site 25, Site 21.
 - b. The sites are **not** within the level of growth proposed within the Core Strategy, **they vastly exceed the level of growth**. The CS requires $18\% \times 689 = 124$ additional dwellings. But 124 have already been granted planning permission, so are existing completions and extant commitments. The Submission NDP includes $8 + 6 + 10 = 24$ dwellings allocated on the 3 sites. These 24 are over and above the CS target, therefore they will be in excess of the level of growth proposed within the Core Strategy. 21.4% not 18%.
2. Para 8.4 states "*Dwr Cymru Welsh Water (DCWW) has stated for the Core Strategy that there is currently existing capacity with regards to permitted headroom in the Sewerage Treatment works serving the Burghill area to continue to treat the water from the amount of housing provided for in the Core Strategy policies. Policy SD4 of the Core Strategy and Policy B13 of the NDP indicate that development would not permitted if wastewater treatment and water quality cannot be assured in the matrix assessment*". DCWW may well have said that but it is irrelevant to allocations which are not on the existing network, i.e. the allocations at Tillington (which is off-sewer).
The comments in the matrices in Appendix 3 state that for both Site 10 at Tillington (8 dwellings), and Site 25 at Tillington (6 dwellings) i.e. 14 dwellings (which are 60% of the excessive growth in this plan) "Welsh water have indicated sufficient headroom as present.". This refers to spare mains sewage capacity at the Eign and Rotherwas sewage treatment plants in Hereford but the spare capacity is obviously completely irrelevant

because these 14 dwellings will be exuding their sewage into septic tanks, boreholes and sundry other emitters of environmental pollution.

I appreciate that this particular plan has been drifting on for so long at a snail's pace that it has been overtaken by events, so the HRA becomes out-of-date. It remains very strange that not only is the included growth far in excess of target, but that there is also an unsigned document on the Neighbourhood Planning website ("Burghill Parish Council responses to Regulation 16 representations) which has the effrontery to question whether granted planning permissions actually will come to fruition. One wonders why Herefordshire Council needs a planning department when there is such apparent expertise lurking in rural parish councils! Seriously, surely the time to be concerned about this is at the time of the annual plan reviews which the Qualifying Body claims it will undertake, not when the plan period still has 13 years to run?

Kind regards
David King

Latham, James

From: Banks, Samantha
Sent: 20 September 2018 14:21
To: Latham, James
Subject: FW: Burghill NDP Habitats Regulation Assessment

From: Martin Roberts
Sent: 27 August 2018 20:09
To: Banks, Samantha <Samantha.Banks2@herefordshire.gov.uk>
Subject: Burghill NDP Habitats Regulation Assessment

Dear Samantha Banks,

Having tried to keep informed, living in the Parish, of the progress of the Burghill Neighbourhood Development Plan, I have become aware of the “Burghill NDP Habitats Regulation Assessment Report.” There are inaccuracies that must be corrected.

It states, “The plan is a criteria based document but does have 7 site allocations.” There are in fact 3 site allocations not 7. They are sites 10, 25 and 21.

“These sites are still within the level of growth proposed within the Core Strategy,” is a false statement whether it is for 7 sites or 3. The Core Strategy requires 18% growth which for Burghill Parish equals 124 additional dwellings. 124 dwellings have already been granted planning permission! The Burghill Submission NDP includes 8 for site 10, 6 for site 25 and 10 for site 21 which makes 24 in total for the three sites. These 24 are over and above the Core Strategy target and therefore they will be in excess of the level of growth proposed within the Core Strategy!

Also I see that para 8.4 states, “Dwr Cymru Welsh Water has stated for the Core Strategy that there is currently existing capacity with regards to permitted headroom in the Sewerage Treatment works serving the Burghill area to continue to treat water from the amount of housing provided for in the Core Strategy Policies. Policy SD4 of the Core Strategy and Policy B13 of the BDP indicate that development would not be permitted if wastewater treatment and water quality cannot be assured in the matrix assessment.” This totally ignored the fact that over half the rural growth would be off-sewer because of it’s location i.e. Tillington!

The matrices in Appendix 3 of the HRA for both site 10 and site 25, a total of 14 dwellings (which are all above “the level of growth proposed within the Core Strategy”) states, “Welsh Water have indicated sufficient headroom at present.” This ‘spare capacity’ is obviously completely irrelevant because these 14 dwellings will be using septic tanks or other methods of possible environmental pollution.

It is very important that these mistakes are corrected because the whole NDP process has the potential to alter for ever, perhaps for the worse, the rural nature of Herefordshire Parishes and it is essential that in order for it to be a true, open, democratic and honest process the facts need to be accurate!

Thank you.

Regards,
Martin Roberts

Sent from my iPad