

### **Site K1 Greenfield Drive**

We agree that this site should be deleted as an allocation and added to the list of permissions and completions since 2011. We suggest re-numbering the sites list to reflect this change.

### **Site K5 Mill Street**

We proposed that the access to the site should be created by extending the present cul de sac that comes off Crabtree Lane below the Car Park. We have had discussions with Herefordshire Highways Dept Staff and they consider it a safe access to the site with some re-engineering. Making the access will require negotiation with the County who own a section of the proposed route and with a landowner whose property is to the south of the site and whose access will have to be crossed. We will revise the text to make the proposed access clear.

### **Site KHI Hergest**

The priority habitat is between the site and the river rather than included within it. The proposed Local Green Space that is shown on Plan 2 on the boundary of the proposed housing site is designed to give additional protection to the habitat beyond the boundary.

We suggest, in light of your concern, that we add a 4<sup>th</sup> Bullet Point to Policy H3 (Housing at Hergest) as follows

**All the dwellings should be placed towards the eastern end of the allocated site with Local Green Space designated to the west adjoining the eastern end of the gardens on the existing housing estate (Arrow View)**

We propose that this additional Local Green Space be shown on Plan 2 and that para 9.4.44 in the Justification Section be amended as follows :

**The design and layout of any future proposal will need to be consistent with adjacent development. The proposed siting of the dwellings towards the eastern end of the site will create an acceptable distance from the turkey sheds. The proposed siting of the Local Green Space with some tree planting at the western end of the site will provide an area of shared amenity space with the existing housing. The priority habitat Deciduous Woodland that lies at a lower level and to the north of the site should be protected by distance from the site.**

## HC Internal Consultees additional comments at Examination Stage

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### **Hergest Site KR1**

#### **Ecology 10/5/19**

As regards priority habitat I don't think I can add anything more to my comments made back in Feb 2017 on this site:

*Comments you previously sent through for Hergest on 15/08/16- KR1 – From the aerial images it would appear that majority of any maturing tree cover has already been removed and as such the priority woodland habitat has already been eroded; however the habitat created could well offer a diverse range of ecological habitats suitable for reptiles and amphibians. The remaining trees and boundary features would be important wildlife corridors and features. The River Arrow also has potential for Otters that may well utilise the unmanaged site. I would be requesting a full ecological and tree survey to include some longer term survey work during optimal times of the year for bats, birds, otters, amphibians and reptiles. Any development would need to demonstrate full mitigation and a high level of enhancements - including but not limited to bird and bat roosting opportunities in/on the new buildings, hedgehog, and pollinator homes and reptile/amphibian refugia in the retained habitat areas; and a long term management strategy for the remaining trees, riverside and flood meadow/grass areas. I would expect my landscape colleagues to be concerned about the possible visual impact from the well walked ridge and Offa's Dyke Path.*

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#### **Environmental Health Air Quality 16/5/19**

From an Air Quality perspective it is difficult to make a definitive comment in relation to the proposed housing site, without having the numbers of birds housed on the site. From speaking with the EA, it appears that the site is not permitted therefore it is likely that the number of birds is below 40,000.

Local Authority Quality Management, Technical Guidance Note 16 provides a screening calculation for assessing potential PM10 emissions from Poultry sites.

Where units hold less than 100,000 turkeys and receptors are greater than 100m from the poultry units, there is unlikely to be an exceedance of PM10 Air Quality Objective levels.

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#### **Environmental Health Noise Nuisance Waste 16/5/19**

Thank you for your enquiry regarding the proposed settlement site and the potential adverse impacts from the turkey farm to the south west. The boundary to this site is just over 200m from the boundary of the turkey farm.

Although the turkey farm is clearly visible, we do not appear to have any actual records of it on our Environmental Health database which is pretty extensive. This means that we have not had any complaints regarding its operation nor alleged adverse impacts on neighbours.

We have checked with the Environment Agency (EA) who do not permit this site which suggests that it is under the threshold for the permitting of intensive livestock of 40,000 birds

Our experience of involvement with intensive livestock especially poultry is that odour emissions are at their peak when the birds are removed and the sheds are emptied and cleaned out. The EA guidance for permitted sites is that generally speaking at the closest sensitive receptors ie residential properties, there should be no more than a maximum of 3 European Odour Units for cubic metre ( $ou\epsilon/m^3$ ) for 98% of the time. In other words, it is accepted that the benchmark standard for moderately offensive odours will be breached at intervals for a short duration.

Our expectation is that the turkey sheds would be emptied, turkeys removed and cleaned out perhaps 3-4 times a year. During the clean out there may be offensive odours but these will be of limited duration. Smells from muck spreading in the vicinity not necessarily associated with the turkey sheds will not be dissimilar in other words of higher intensity but short duration.

It would not we don't think be possible to supply mitigation against odours at the proposed settlement site other than by increased distance and there is already a housing settlement at Arrow View and the green space area acting as a buffer between the settlement boundary.

Although we cannot say that the proposed occupants will not be impacted by smells from the turkey farm especially given the prevailing wind direction our understanding is that these would be likely to be of limited duration.

As the turkey farm would not require a permit, any complaints relating to noise and nuisance would be for the local authority to investigate and where necessary to enforce should it be determined that a Statutory Nuisance exists or is likely to occur or recur.

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## **Site K5**

### **Transportation comments 10/5/19**

Following on from our site meeting to the site that is being queried as part of your NDP development (K5) relating to the ability to form an access to the site the points below may be of use:

- The existing points of access are, as you have already assessed, unsuitable.
- Your proposed solution was to take a route through Markwick Close which is part of the highway network as demonstrated in the image below (public highway is shaded blue).
- This would involve it crossing Bath Cottage Lane which is a private road and a quick check of the Public Rights of Way (PROW) on the Herefordshire Council Web page seems to suggest it is not a PROW.
- In principle, this route could probably be made acceptable. Obviously I haven't looked at the intricacies of the design, but concept of extending the line of Marwick Close for 15 dwellings could be achieved, depending on the land ownership situation.
- There may be some engineering alterations needed to Markwick Close to improve pedestrian connectivity to the site and there is definitely some work to be done with Statutory Undertakers around any connection through to the land. Additionally the access to the dwelling at the end of Bath Cottage Lane would need to be appropriately managed. Whilst these headlines may not be necessary for this stage, they represent my 'first glance' at the site proposal and I include them for completeness.

