

Latham, James

From: Turner, Andrew
Sent: 23 April 2018 15:27
To: Neighbourhood Planning Team
Subject: RE: Border Group Regulation 16 neighbourhood development plan consultation

Re: Border Group draft Neighbourhood Development Plan

Dear Neighbourhood Planning Team,

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.

I refer to the above NDP and having reviewed Ordnance survey historical plans I would make the following comments with regard to the proposed housing development sites identified in brown on the following maps;

'Adforton Polices Map' (BG3, BF4 & BG5)

- Policy BG4: Redevelopment of Land North of Letton Lane (Land on the north side of Letton Lane, agricultural buildings)

I would mention that 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.

'Lingen Policies Map' (BG7, BG8 & BG9)

- Policy BG8: Land at the Nursery, Lingen. (Land comprising of a former plant nursery)

Regarding the former nursery I would 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.

- Policy BG9: Land at the Turn Farm, Lingen.

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.

Regarding sites with a historic agricultural use, I would 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

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From: Neighbourhood Planning Team

Sent: 16 March 2018 10:46

Subject: Border Group Regulation 16 neighbourhood development plan consultation

Dear Consultee,

Border 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/3032/border_group_neighbourhood_development_plan

Date: 26th April 2018

Neighbourhood Planning Team,
Planning Services,
PO Box 230,
Hereford,
HR1 2ZB

Email: neighbourhoodplanning@herefordshire.gov.uk

Dear Sir/ Madam,

RE: Border Group Neighbourhood Development Plan, Regulation 16 Consultation.

I write in respect of the public consultation on the Border Group Neighbourhood Development Plan (NDP). My client owns land on the western side of Adforton off Letton Lane, which is identified as a site for development in the draft NDP submitted on the 12th March as part of Regulation 16. I also attach a plan identifying land owned by my client.

Policy BG5: Conversion and Extension to Redundant Barn at the North End of Adforton Village is specific to my client's site and states; *The redundant barn at the west end of Adforton Village identified on Adforton Policies Map may be converted and extended to provide one dwelling.*

The policy also states; *Development upon the intervening gap would not be appropriate in that the combination effect of development upon the embankment and hedgerow along Letton Lane would have a significant detrimental effect on the character of the lane.*

Given the need for more housing and to provide greater flexibility for Adforton and wider Boarder Group to achieve their housing targets I believe there is an opportunity to allocated the land between the redundant barn and the main part of the village for housing development. Any impact on the character of the village and hedgerow would be assessed as part of any detailed planning application and if deemed unacceptable would be refused. As indicated on the attached plan any development in this location would be linear roadside development.

There is also an opportunity to allow a small increase in housing numbers on the identified redundant barn site (BG5). As stated above a formal planning application would determine the merits of any additional housing on this site.



I look forward to hearing from you and thank you for the opportunity to comment on the Neighbourhood Development Plan.

Yours sincerely,

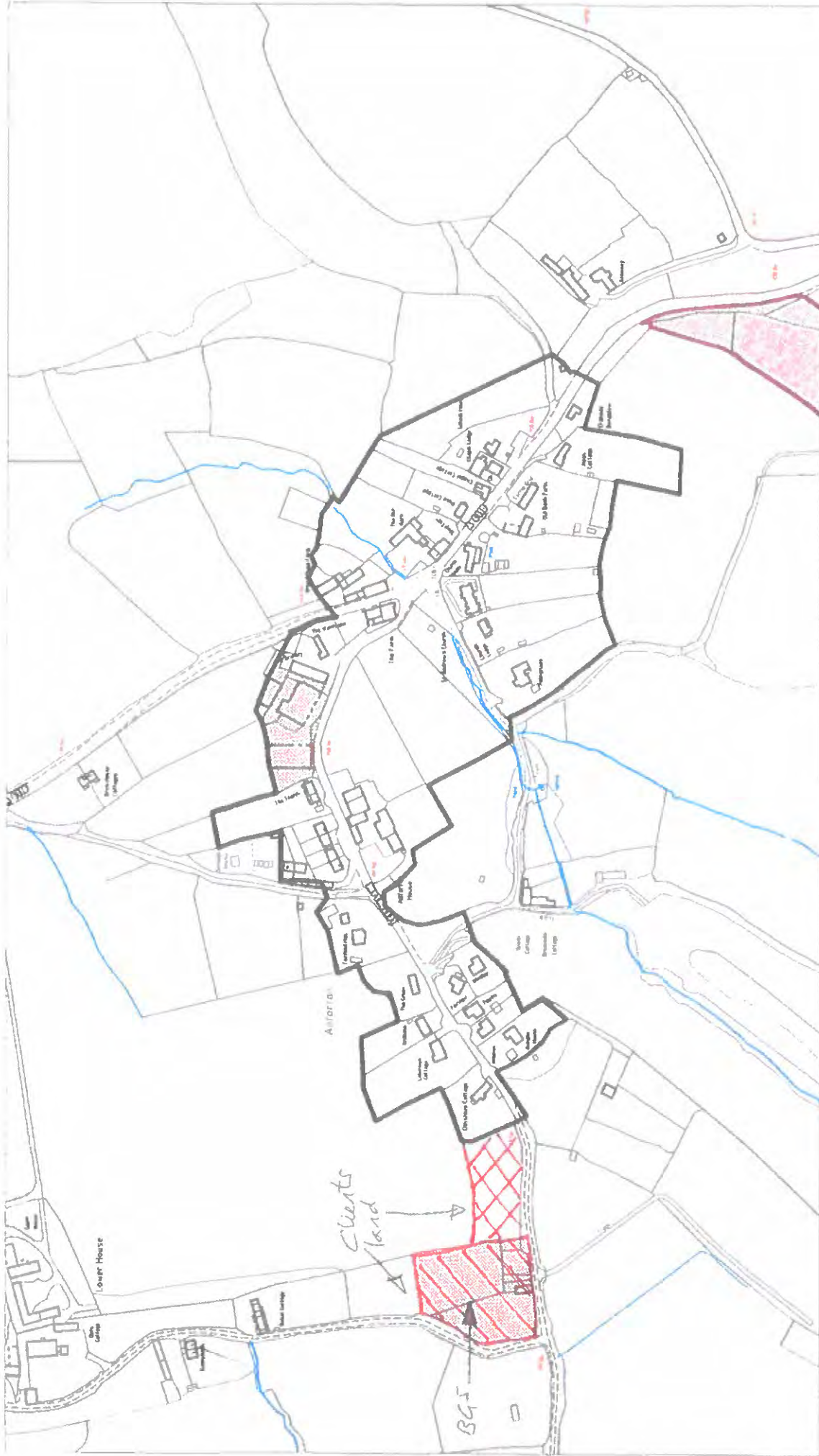


**Graham Clark BA (Hons) DipTP MRTPI
for and on behalf of Berrys**

Email: graham.clark@berrys.uk.com

Tel: 01432 809 833

Mob: 07741 310 312



Proposed Housing Site (BG3, BG4, BG5)

Adforton Settlement Boundary (BG2, BG3)

Local Wildlife Site (LWS)

Adforton Policies Map

Scale 1:3,500
at A4 size



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Date: 26th April 2018

Neighbourhood Planning Team,
Planning Services,
PO Box 230,
Hereford,
HR1 2ZB

By Email: neighbourhoodplanning@herefordshire.gov.uk

Dear Sir/ Madam,

RE: Border Group NDP - Lingen

I write to you on behalf of my client with regard to the consultation of the draft Neighbourhood Development Plan and specifically Policy BG8: Land at the Nursery, Lingen. I write to request that the draft plan be amended in policy section BG8 part F and section 3.30.

The Lingen Nursery site is included within the development boundary area and Policy BG8 is dedicated specifically to this site. Whilst it's positive that the site has been identified for housing development it is suggested that the detailed requirements for this site be amended.

Policy BG8, part F, states that the site should provide a mix of house types, with an emphasis upon family accommodation comprising two and three-bedroom properties. However, it is considered that families will also want some larger accommodation and therefore a greater range of property sizes should be listed in this policy. I would suggest a mix of 2, 3, and 4 bedroom properties.

In addition Policy BG8 should also be amended to allow up to 8 properties on the site, which would be in line with the figures quotes in the Development Brief for the site (Appendix 1 of the NDP).

It is considered that these amendments to the policy would remain in line with the ethos and aspirations for the site and village of Lingen. Furthermore any detailed proposals that come forward will be scrutinised as part of a future planning application.



Thank you for the opportunity to make comment on the development on this Neighbourhood Development Plan, we would welcome any dialogue regarding the Lingen Nursery site.

Yours sincerely,



Graham Clark BA (Hons) DipTP MRTPI
for and on behalf of Berrys
Email: graham.clark@berrys.uk.com
Tel: 01432 809 833
Mob: 07741 310 312



The Coal
Authority



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 Team
Herefordshire Council

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

12 April 2018

Dear Neighbourhood Planning Team

Border Group Neighbourhood Development Plan - Submission

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: Barbara <admin@cpreherefordshire.org.uk>
Sent: 16 March 2018 15:24
To: Neighbourhood Planning Team
Subject: RE: Border Group Regulation 16 neighbourhood development plan consultation

Dear James

Thank you for this consultation, which I will forward to volunteers.

Kind regards
Barbara

Barbara Bromhead-Wragg
CPRE Herefordshire Administrator
www.cpreherefordshire.org.uk

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From: Neighbourhood Planning Team [mailto:neighbourhoodplanning@herefordshire.gov.uk]
Sent: 16 March 2018 10:46
Subject: Border Group Regulation 16 neighbourhood development plan consultation

Dear Consultee,

Border 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/3032/border_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 16 March 2018 to 27 April 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.

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

James Latham

Latham, James

From: Norman Ryan <Ryan.Norman@dwrwymru.com>
Sent: 20 April 2018 15:34
To: Neighbourhood Planning Team
Cc: Evans Rhys
Subject: RE: Border Group Regulation 16 neighbourhood development plan consultation
Attachments: DCWW consultation response - Border Group NDP - 21 02 2017.pdf

Dear Sir/Madam,

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

We were consulted at the Regulation 14 Stage of the process and as such have no further comment – please see attached this previous representation for your information.

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

Kind regards,



Ryan Norman

Forward Plans Officer | Developer Services | Dwr Cymru Welsh Water

Linea | Cardiff | CF3 0LT | T: 0800 917 2652 | www.dwrwymru.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.dwrwymru.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: 16 March 2018 10:46

Subject: Border Group Regulation 16 neighbourhood development plan consultation

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

Dear Consultee,

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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.



Forward Planning
PO Box 3146
Cardiff
CF30 0EH

Tel: +44 (0)800 917 2652
Fax: +44 (0)2920 740472
E.mail: Forward.Plans@dwrcymru.com

Cynllunio Ymlaen
Blwch Post 3146
Caerdydd
CF30 0EH

Ffôn: +44 (0)800 917 2652
Ffacs: +44 (0)2920 740472
E.bost: Forward.Plans@dwrcymru.com

Border Group Neighbourhood Development Plan
F.A.O. Maureen Robinson

Enquiries: Rhys Evans/Ryan Norman
0800 917 2652

Sent via email

21st February 2017

Dear Sir/Madam,

REGULATION 14 PUBLIC CONSULTATION ON BORDER GROUP NEIGHBOURHOOD DEVELOPMENT PLAN (NDP), FEBRUARY 2017

I refer to your email dated the 12th January 2017 regarding the above consultation. Welsh Water appreciates the opportunity to respond and we offer the following representation:

Given that the Border Group Neighbourhood Development Plan has been prepared in accordance with the Adopted Herefordshire Local Plan Core Strategy, Welsh Water are supportive of the aims, objectives and policies set out.

We do not envisage any issues in providing a supply of clean water for the circa 44 new housing units proposed up to 2031, other than the potential provision of off-site main laying.

There is no Welsh Water operated public sewerage within the Group Parish area. It is our understanding that any public sewerage that does exist within the Group Parish area is operated by Severn Trent Water, as such we would advise that they are contacted for comment on the impact of development on their assets. Where no public sewerage exists, alternative foul drainage options will be required in line with the criteria set out under Policy SD4 of the Core Strategy.

We hope that the above information will assist you as you continue to progress the Neighbourhood Development Plan. In the meantime, should you require any further information please do not hesitate to contact us at Forward.Plans@dwrcymru.com or via telephone on 0800 917 2652.

Yours faithfully,

Ryan Norman
Forward Plans Officer
Developer Services



Welsh Water is owned by Glas Cymru – a 'not-for-profit' company.
Mae Dŵr Cymru yn eiddo i Glas Cymru – cwmni 'nid-er-elw'.

We welcome correspondence in
Welsh and English

Dŵr Cymru Cyf, a limited company registered in
Wales no. 2366777. Registered office: Pentwyn Road,
Nelson, Treharris, Mid Glamorgan CF46 6LY

Rydym yn croesawu gohebiaeth yn y
Gymraeg neu yn Saesneg

Dŵr Cymru Cyf, cwmni cyfyngedig wedi'i gofrestru yng
Nghymru rhif 2366777. Swyddfa gofrestredig: Heol Pentwyn
Nelson, Treharris, Morgannwg Ganol CF46 6LY.

Our ref: SV/2010/103979

Your ref:

Date: 25 April 2018

Herefordshire Council
Neighbourhood Planning Team
Plough Lane
Hereford
HR4 0XH

F.A.O: Mr. James Latham

BORDER GROUP REGULATION 16 NEIGHBOURHOOD PLAN

I refer to your email of the 16 March 2018 in relation to the above consultation. Having reviewed the Regulation 16 Neighbourhood Plan I would offer the following comments for your consideration 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 welcome consideration of flood risk in the plan and also in consideration of future development throughout the Parish. As confirmed on the submitted Pro Forma all development will be located within Flood Zone 1, the low risk Zone. We do note that the Nursery Site in Lingen does border the Limebrook (Ordinary Watercourse) and that there is an area of Flood Zone 2/3 associated with this watercourse. However, as the site is proposed to accommodate between 6-8 dwellings we would accept that all built development could be located within Flood Zone 1. Any forthcoming planning application will need to be accompanied by a detailed Flood Risk Assessment (FRA) which confirms that the development will be safe without increasing flood risk to third parties. Development of the site, and all windfall development within the Parish, should adhere to your Policy BG14 (Flooding and Surface Water) along with Policy SD3 of Herefordshire Council's Core Strategy.

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. Please can you also copy in any future correspondence to my team email address at SHWGPlanning@environment-agency.gov.uk

Yours faithfully

Mr. Graeme Irwin

Senior Planning Advisor

Direct dial: 02030 251624

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



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: PL00059263

29 March 2018

Dear Mr Latham

BORDER GROUP NEIGHBOURHOOD PLAN - REGULATION 16 CONSULTATION

Thank you for the invitation to comment on the Border Group Neighbourhood Plan.

Our previous regulation 14 comments 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. Specific references in Policy BG17(now 21) to the protection of historic farmsteads and archaeological remains are particularly welcome.

Overall the plan reads as a well-considered, concise and fit for purpose document which we consider takes a suitably proportionate approach to the historic environment of the Parish”.

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 you find this advice helpful.

Yours sincerely,

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

cc:



THE AXIS 10 HOLLIDAY STREET BIRMINGHAM B1 1TG

Telephone 0121 625 6870
HistoricEngland.org.uk



Latham, James

From: Knight, Matthew
Sent: 23 March 2018 15:27
To: Neighbourhood Planning Team
Subject: RE: Border Group Regulation 16 neighbourhood development plan consultation

Thank you for consulting the Building Conservation Team

We have no comments to make on this NDP

Regards

Matthew

From: Neighbourhood Planning Team
Sent: 16 March 2018 10:46
Subject: Border Group Regulation 16 neighbourhood development plan consultation

Dear Consultee,

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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.

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

James Latham
Technical Support Officer
Neighbourhood Planning and Strategic Planning teams
Herefordshire Council
Plough Lane
Hereford
HR4 0LE

Tel: 01432 383617

Email: jlatham@herefordshire.gov.uk

neighbourhoodplanning@herefordshire.gov.uk (for Neighbourhood Planning enquiries)

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 March 2018

Dear Sir / Madam

**Border Group Neighbourhood Plan Consultation
SUBMISSION ON BEHALF OF NATIONAL GRID**

National Grid has appointed Amec Foster Wheeler 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
amecfw.com

Amec Foster Wheeler Environment
& Infrastructure 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

Amec Foster Wheeler E&I UK
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

Latham, James

From: Enquiries <enquiries@nationaltrust.org.uk>
Sent: 16 March 2018 20:37
To: Neighbourhood Planning Team
Subject: e: Border Group Regulation 16 neighbourhood development plan consultation [REF:152213224943]

Dear James

Thank you for your email.

You've reached the membership department of the National Trust.

I've forwarded your query directly to the relevant team.
Please allow 7 days for a response.

I hope that this helps.

Thank you for taking the time to write to us.

Kind regards
Jessica Woolley
Supporter Services Centre
National Trust

Latham, James

From: Amos, Tom (NE) <Thomas.Amos@naturalengland.org.uk>
Sent: 19 March 2018 11:46
To: Neighbourhood Planning Team
Subject: Border Group Regulation 16 neighbourhood development plan consultation - Natural England response

Dear Mr Latham

Border Group Neighbourhood Plan - Regulation 16 - Submission

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

Natural England has no further comment to make on this plan at this stage; however, should significant changes have been made since the Regulation 14 submission, please consult us again if you consider that you require a more detailed response.

For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours sincerely

Tom Amos
Planning for a Better Environment Team
West Midlands Team
Natural England,
County Hall, Spetchley Road,
Worcester, WR5 2NP
Tel: 02080260961

Follow the South Mercia team on Twitter - [@NESouthMercia](https://twitter.com/NESouthMercia)

www.gov.uk/natural-england

We are here to secure a healthy natural environment for people to enjoy, where wildlife is protected and England's traditional landscapes are safeguarded for future generations.

In an effort to reduce Natural England's carbon footprint I will, wherever possible, avoid travelling to meetings and attend via audio, video or web conferencing.

Natural England offers two chargeable services – The Discretionary Advice Service (DAS) provides pre-application, pre-determination and post-consent advice on proposals to developers and consultants as well as pre-licensing species advice and pre-assent and consent advice. The Pre-submission Screening Service (PSS) provides advice for protected species mitigation licence applications.

These services help applicants take appropriate account of environmental considerations at an early stage of project development, reduce uncertainty, reduce the risk of delay and added cost at a later stage, whilst securing good results for the natural environment.

Latham, James

From: Catherine James (CSP - Regeneration and Corporate Property) <catherine.james1@powys.gov.uk>
Sent: 29 March 2018 12:19
To: Neighbourhood Planning Team
Subject: Border Group Regulation 16 neighbourhood development plan consultation

Dear Mr Latham,

Thank you for your consultation email and the opportunity to make representation on the above NDP.

We have no comments to make at this time.

Regards,

Catherine James

Planning Policy Officer

Planning Policy

Cyngor Sir Powys County Council

Y Gwalia / The Gwalia, Ffordd Ithon / Ithon Road

Llandrindod Wells, Powys, LD1 6AA.

Ffon / Tel: 01597 827288

Ebost / Email: catherine.james1@powys.gov.uk

Croesewir gohebiaeth yn y Gymraeg a'r Saesneg/Correspondence welcomed in Welsh and English

Mae'r e bost hwn ac unrhyw atodiad iddo yn gyfrinachol ac fe'i bwriedir ar gyfer y sawl a enwir arno yn unig. Gall gynnwys gwybodaeth freintiedig. Os yw wedi eich cyrraedd trwy gamgymeriad ni ellwch ei gopio, ei ddsbarthu na'i ddangos i unrhyw un arall a dylech gysylltu gyda Cyngor Sir Powys ar unwaith. Mae unrhyw gynnwys nad yw'n ymwneud gyda busnes swyddogol Cyngor Sir Powys yn bersonol i'r awdur ac nid yw'n awdurdodedig gan y Cyngor.

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NEIGHBOURHOOD PLAN FEEDBACK

Border Parishes

No objections to proposals to Lingen nursery site housing allocation and no further comments

Robert Widdicombe
Senior Ecologist
Conservation Team
Herefordshire Council

Neighbourhood Development Plan (NDP) – Core Strategy Conformity Assessment

From Herefordshire Council Strategic Planning Team

Name of NDP: Border Group- Regulation 16 submission draft

Date: 11/04/18

Draft Neighbourhood plan policy	Equivalent CS policy(ies) (if appropriate)	In general conformity (Y/N)	Comments
BG1- Promoting a Sustainable Community	SS1	Y	
BG2- Development Strategy	SS1; SS2; RA1; RA2	Y	
BG3- New Homes in Adforton	RA1; RA2	Y	
BG4- Redevelopment of Land North of Letton Lane	SS1	Y	
BG5- Conversion and Extension to Redundant Barn at the North End of Adforton Village	SS1	Y	
BG6- New Homes in Brampton Bryan	SS1; RA1; RA2	Y	
BG7- New Homes in Lingen	RA1, RA2	Y	
BG8- Land at the Nursery, Lingen	SS1; H3; LD1; LD2; SD1; SD3	Y	
BG9- Land at the Turn Farm, Lingen	SS1; LD1; LD4; SD1	Y/N	<p>Criterion D: “...and non-traditional features avoided.”</p> <p>Care should be taken here to ensure that new buildings are not unnecessarily restricted from new innovative designs or</p>

Draft Neighbourhood plan policy	Equivalent CS policy(ies) (if appropriate)	In general conformity (Y/N)	Comments
			features where they integrate appropriately with the existing buildings. This flexibility is consistent with the design policies of the Core Strategy and Criterion A of BG13.
BG10- New Homes in Walford	SS1; MT1; LD1; LD2; SD1; SD3	Y	
BG11- Land South of Walford	SS1; H3; LD1; SD3; SD4	Y	
BG12- Provision of Affordable Housing	SS1; H1; H2	Y	
BG13- Design Criteria for Residential Development	SS1; LD1-LD4; SD1-SD4	Y	
BG14- Supporting Local Business	SS1; SS5; E1-E4, RA5, RA6	Y	
BG15- Broadband and Mobile Telephone Infrastructure	SS1; E3, RA6	Y	
BG16- Renewable Energy	SS1; SS7; SD2	Y	
BG17- Highways and Transport Infrastructure	SS1; SS4; MT1	Y	
BG18- Flooding and Surface Water Drainage	SS1; LD2; SD3	Y	
BG19- Accessibility to Services and Facilities	SS1; SC1	Y	Stronger protection could be afforded to valued local services/facilities by formally listing them in the policy itself.

Draft Neighbourhood plan policy	Equivalent CS policy(ies) (if appropriate)	In general conformity (Y/N)	Comments
BG20- Protecting and Enhancing the Natural Environment and Landscape	SS1; SS6; LD1-LD3	Y	
BG21- Protecting Local Heritage	SS1; SS6; LD4	Y	
BG22- Lingen Conservation Area	SS1; LD4	Y	

01 May 2018

Our ref: Herefordshire 32

Dear Sir/Madam

Border Group Regulation 16 neighbourhood development plan consultation

Thank you for the opportunity to comment on your consultation. We currently have no specific comments to make, but please keep us informed when your plans are further developed when we will be able to offer more detailed comments and advice.

For your information we have set out some general guidelines that may be useful to you.

Position Statement

As a water company we have an obligation to provide water supplies and sewage treatment capacity for future development. It is important for us to work collaboratively with Local Planning Authorities to provide relevant assessments of the impacts of future developments. For outline proposals we are able to provide general comments. Once detailed developments and site specific locations are confirmed by local councils, we are able to provide more specific comments and modelling of the network if required. For most developments we do not foresee any particular issues. Where we consider there may be an issue we would discuss in further detail with the Local Planning Authority. We will complete any necessary improvements to provide additional capacity once we have sufficient confidence that a development will go ahead. We do this to avoid making investments on speculative developments to minimise customer bills.

Sewage Strategy

Once detailed plans are available and we have modelled the additional capacity, in areas where sufficient capacity is not currently available and we have sufficient confidence that developments will be built, we will complete necessary improvements to provide the capacity. We will ensure that our assets have no adverse effect on the environment and that we provide appropriate levels of treatment at each of our sewage treatment works.

Surface Water and Sewer Flooding

We expect surface water to be managed in line with the Government's Water Strategy, Future Water. The strategy sets out a vision for more effective management of surface water to deal with the dual pressures of climate change and housing development. Surface water needs to be managed sustainably. For new developments we would not expect surface water to be conveyed to our foul or combined sewage system and, where practicable, we support the removal of surface water already connected to foul or combined sewer.

We believe that greater emphasis needs to be paid to consequences of extreme rainfall. In the past, even outside of the flood plain, some properties have been built in natural drainage paths. We request that developers providing sewers on new developments should safely accommodate floods which exceed the design capacity of the sewers.

To encourage developers to consider sustainable drainage, Severn Trent currently offer a 100% discount on the sewerage infrastructure charge if there is no surface water connection and a 75% discount if there is a surface water connection via a sustainable drainage system. More details can be found on our website

<https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-and-guidance/infrastructure-charges/>

Water Quality

Good quality river water and groundwater is vital for provision of good quality drinking water. We work closely with the Environment Agency and local farmers to ensure that water quality of supplies are not impacted by our or others operations. The Environment Agency's Source Protection Zone (SPZ) and Safe Guarding Zone policy should provide guidance on development. Any proposals should take into account the principles of the Water Framework Directive and River Basin Management Plan for the Severn River basin unit as prepared by the Environment Agency.

Water Supply

When specific detail of planned development location and sizes are available a site specific assessment of the capacity of our water supply network could be made. Any assessment will involve carrying out a network analysis exercise to investigate any potential impacts.

We would not anticipate capacity problems within the urban areas of our network, any issues can be addressed through reinforcing our network. However, the ability to support significant development in the rural areas is likely to have a greater impact and require greater reinforcement to accommodate greater demands.

Water Efficiency

Part G of Building Regulations specify that new homes must consume no more than 125 litres of water per person per day. We recommend that you consider taking an approach of installing specifically designed water efficient fittings in all areas of the property rather than focus on the overall consumption of the property. This should help to achieve a lower overall consumption than the maximum volume specified in the Building Regulations.

We recommend that in all cases you consider:

- Single flush siphon toilet cistern and those with a flush volume of 4 litres.
- Showers designed to operate efficiently and with a maximum flow rate of 8 litres per minute.
- Hand wash basin taps with low flow rates of 4 litres or less.
- Water butts for external use in properties with gardens.

To further encourage developers to act sustainably Severn Trent currently offer a 100% discount on the clean water infrastructure charge if properties are built so consumption per person is 110 litres per person per day or less. More details can be found on our website

<https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-and-guidance/infrastructure-charges/>

We would encourage you to impose the expectation on developers that properties are built to the optional requirement in Building Regulations of 110 litres of water per person per day.

We hope this information has been useful to you and we look forward in hearing from you in the near future.

Yours sincerely

Rebecca McLean

Lead Catchment Planner

growth.development@severntrent.co.uk

Latham, James

From: Planning Central <Planning.Central@sportengland.org>
Sent: 06 April 2018 15:42
To: Neighbourhood Planning Team
Subject: Border Group Neighbourhood Plan

Thank you for consulting Sport England on the above neighbourhood plan.

Sport England notes that there are existing sports facilities within the neighbourhood plan area, notably the cricket ground at Brampton Bryan. In order to protect this and any other sports and recreational buildings and land within the neighbourhood plan area, a policy should be included in the plan to prevent development of these facilities unless an assessment has been undertaken which has demonstrated the playing fields, buildings or land to be surplus to requirements; or the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or the development is for alternative sports and recreation provision, the needs for which clearly outweigh the loss. This is required in order to accord with paragraph 74 of the NPPF and the meet Sport England's policy (<https://www.sportengland.org/facilities-planning/planning-for-sport/playing-fields-policy/>)

Government planning policy, within the **National Planning Policy Framework (NPPF)**, identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.

It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 73 and 74. It is also important to be aware of Sport England's statutory consultee role in **protecting playing fields** and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Playing Fields Policy and Guidance document.

<http://www.sportengland.org/playingfieldspolicy>

Sport England provides guidance on **developing planning policy** for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded.

<http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/>

Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 74 of the NPPF, this takes the form of **assessments of need and strategies for indoor and outdoor sports facilities**. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, 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.

Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to 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. Sport England's guidance on assessing needs may help with such work.

<http://www.sportengland.org/planningtoolsandguidance>

If **new or improved sports facilities** are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes.

<http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/>

Any **new housing** developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.

In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how **any new development**, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.

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. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.

NPPF Section 8: <https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities>

PPG Health and wellbeing section: <https://www.gov.uk/guidance/health-and-wellbeing>

Sport England's Active Design Guidance: <https://www.sportengland.org/activedesign>

(Please note: this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.)

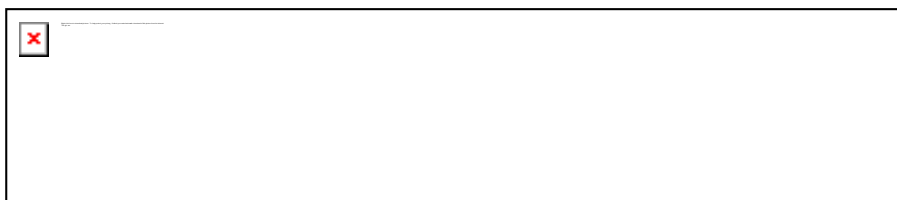
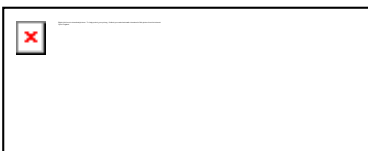
If you need any further advice, please do not hesitate to contact Sport England using the contact details below.

Yours sincerely,

Planning Admin Team

T: 020 7273 1777

E: Planning.central@sportengland.org



Draft

Border Group Draft Neighbourhood Development Plan.

Regulation 16 Consultation.

Submissions by the Residents of Walford.

1. These submissions are made by and on behalf of the residents of Walford whose names and addresses appear at Appendix A to this document.
2. These residents oppose the proposed residential development cited in the Draft Plan and request that Walford be removed as a nominated Settlement (for the reasons set out below); or alternatively that the plan is referred back to the parish council for reconsideration in the light of the residents' objections and new evidence.
3. **Background** The unfortunately flawed process of the proposed plan by the parish council and its steering group is relevant to the present opposition by the residents. As originally proposed by the steering group in 2014, and consulted on with the residents, Walford was not intended as a location for specified development, but for infill sites only, in accordance with rural planning policy (see original draft plan in the parish council's submission). At some stage during 2015, and for reasons which remain unclear, Walford was 're-designated' as a potential development location, and the steering group used this opportunity to allocate sites for some twelve dwellings in the hamlet (out of the total of thirty six designated for the whole parish). However, neither the steering group nor the parish council, neither of which included any Walford residents, considered it necessary to consult the residents on either of these draconian changes to the original proposals. Instead, the plan was pressed through its initial regulation 15 consultation over the Christmas holiday in 2015. For other reasons the consultation was deemed to be a flawed process and was re-run in 2016. Even then, the residents only learned of the Walford proposals by accident, but just in time for objections to be registered. These are included in the BGPC submission on the consultation process.
4. The residents' objections were broadly ignored by the steering group on the sole ground that 'Walford had to bear its share of the housing target', which has no merit as a planning criterion. In fact, as one of the designated landowners withdrew their site, the steering group were left

with one site, to the east of the Lingen road, which was promptly increased from two dwellings to five, notwithstanding that the residents had already specifically objected to this site due to the risk of increased flooding to the nearby properties in Walford Farm Lane. Further objections to this proposal were again over-ruled by the group, even though the required number of houses could, as the advisory planning officer confirmed, be accommodated elsewhere in the plan without difficulty.

5. Consequently, the residents have been obliged to commission, at their own expense, an independent drainage expert's report (attached at appendix B). This acknowledges that while the actual proposed site can be developed free of internal flood risk, being on higher ground outside the designated flood zone, it presents a hazard to the nearby lower lying properties due to increased run off and treated foul water dispersion. Furthermore, although, as the draft plan states, retention of storm water can be achieved, it still has to be discharged at some later stage. Since the water table is permanently high in the Lane, later dispersion will still cause flooding. For the record, the lane area has already been inundated three times in the first three months of 2018, to the extent that the local authority declined to collect refuse from parts of it. The independent report concludes that development should *not* be allowed on this site.
6. Indeed, *any* site for development in the Walford 'settlement area' which is above the flooding zone will inevitably drain into it, thus exacerbating an already flood affected area which includes several Listed buildings and a designated ancient monument. The Environment Agency flood map clearly confirms this.
7. The residents have identified two potential and available development sites for a total of four dwellings within the hamlet, but these have been rejected by the steering group (wrongly in our view) because they are within the flood zone. However, such development is possible if properly planned, and would pose no additional flooding risk to adjoining properties. We are not opposed to development, provided that it can be achieved sensibly and safely.
8. The site proposed in the draft plan, as well as posing additional danger to nearby properties, has no merit in planning, environmental, highways, access, or facilities terms; indeed it has adverse aspects on all these

grounds. It poses a potential danger to the adjoining Birmingham trunk water main, and requires the loss of valuable arable farmland.

Furthermore, it fails to fulfil any of the objectives set out in the HCC core strategy policy RA2, or the stated objectives of the draft Border Group Neighbourhood Plan.

9. Detailed objections on these grounds are set out in the response to the Regulation 15 consultation and are not therefore repeated here.

10. **Conclusion:** the development proposals for Walford in the draft plan have no merit in any properly considered planning terms and pose a proven danger to nearby properties. The argument that Walford 'must bear its share of the housing development target' is entirely specious, and we ask that these BGDNDP proposals for Walford should be struck out in their entirety.

T.M.Dixon RD, B.Sc.(Estate Management), FRICS, IRRV(Hons).

On behalf of the Walford residents

April 2018

Appendix A

Walford residents opposed to the Draft Development Plan Proposals

for residential development off Lingen Road Walford.

Tom and Carole Dixon, Walford Grange

Gary and Shirley Jones, The Motte House

Craig and Debbie Fraser, Walford Court

Lucy Clothier and Phil Eades, Fold Cottage

Jenny Maxwell, Court Cottage

Ian and Juani Urry, Maplecroft

Alastair and Carole Gloag, Bramble Cottage

Karen and Sam Kennerley, Bramble Barn

Colin and Pat Brady, Walford Farm

Val and Jean Richards, Walford House

Simon Vernon, Millenium Cottage

Dominic and Hettie Hodgkinson, Cherry Tree House

Sarah Wynne, Corner Cottage

A. P. Dennis, Brooklyn

Mark Abbott, Townsend House

Rachel Price, The Old Smithy

Appendix B.

**Independent Drainage Engineer's Report on
Flooding Risks in Walford.**



BORDER GROUP

Revised Draft Neighbourhood Development Plan

ASSESSMENT REPORT

**OUTLINE ASSESSMENT OF SITE AT STONEYBRIDGE
FARM, WALFORD, AS A POTENTIAL SITE FOR
FUTURE HOUSING DEVELOPMENT**

(Date of Report: 10th April, 2018)

John S. Cooper,
CSci, CChem, CWEM, MRSC, FCIWEM, DipWEM.
(Consultant on Water, Wastewater &
Environmental Management)
Blymhill Lodge,
Weston-under-Lizard,
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**OUTLINE ASSESSMENT OF SITE AT STONEYBRIDGE FARM, WALFORD,
AS A POTENTIAL SITE FOR FUTURE HOUSING DEVELOPMENT**

(Date of Report: 10th April, 2018)

1. INTRODUCTION

The revised draft neighbourhood development plan issued by the Border Group in October '17 identifies potential locations for future housing development within the parishes of Adforton; Brampton Bryan; Buckton and Coxall; Lingen; Walford, Letton and Newton; and Willey (these parishes comprising the Border Group).

At Walford, apart from possible infill development, the plan identifies only one site, that at Stoneybridge Farm, as having the potential for future development due to much of this settlement being at risk of flooding from the River Teme and its local tributaries.

This report further assesses the suitability of this Walford site for future development.

2. LOCATION OF THE PROPOSED DEVELOPMENT SITE AT WALFORD

Location of the proposed development site at Walford is shown both on the Walford Policies Map (taken from the revised draft neighbourhood development plan) and on the more detailed OS plan, copies of which are provided in Appendix 1.

The proposed development site is at a height of approximately 125m above OS datum and is located outside those areas of Walford identified as at risk of flooding from the River Teme and its local tributaries as shown on the flood risk map provided in Appendix 2 (the latter map derived from that produced by the Environment Agency). From the site the land falls in a generally east north easterly direction towards the locality of Fold Cottage.

The Elan Valley Aquaduct (shown in blue) passes from east to west through land immediately adjacent to the south of the proposed site. To prevent undue risk of damage to this facility constraints will apply to any building works conducted in the vicinity of the aquaduct as specified by Severn Trent Water Ltd.

3. GROUND CONDITIONS AT THE PROPOSED DEVELOPMENT SITE

Based on information reported by British Geological Survey the ground at the proposed development site, currently a greenfield site, comprises glaciofluvial deposits (sand and gravel) which should be relatively free draining.

It is considered therefore that moderate rainfall on the existing greenfield site should drain into the ground without giving rise to any significant surface water run-off from the site,

the water so drained into the ground flowing (as ground water) through belowground strata in the general direction of Fold Cottage and the surrounding area where the water table will be close to the surface of the ground and that of the nearby stream. The level of the water table in the latter locality can be expected to rise and fall dependent upon the local weather conditions.

It is possible, however, subject to the porosity of the ground at the site, that over prolonged periods of rainfall and/or under severe storm conditions there could be some surface water run-off from the site, this flowing overground in the general direction of Fold Cottage also.

4. **INCREASED POTENTIAL FOR FLOODING**

Whilst the proposed development site is not thought itself to be at risk of flooding due to its elevation, the increased potential resulting from development of the site for flooding of the area east north east of the site, particularly that area in the locality of Fold Cottage, Walford Court and the lane serving both Fold Cottage, Walford Court and the adjoining properties, is of real concern.

Although Fold Cottage and Court House, both listed buildings, appear to lie outside those areas of Walford at risk of flooding it is understood that in fact both properties and the adjoining areas have been flooded on occasion as evidenced by the photographs in Appendix 3 (Photographs 1 to 5) of flooding in these areas over recent years.

Indeed, at Fold Cottage, in an attempt to prevent further flooding of the cottage itself, three pumps have been installed within the grounds of the cottage to pump flood water away and an earth bund has been erected as a flood barrier around the cottage (see Photograph 7). Nevertheless, it is understood that there have still been occasions when these precautions have come close to being inundated also. This situation is unlikely to improve with climate change and/or if building works on the proposed development site is progressed.

It is noted that whilst building on the proposed development site will not itself increase the volumes of rainwater falling on the site during rainfall events, these volumes remaining as would be the case for the existing greenfield site, what will change is the rate of run-off of surface water from impervious areas (ie. roofs, roadways and paved areas) within any new development which is likely to be appreciably more rapid than for the existing greenfield site. The latter increasing the potential for surface water run-off from the site and, hence, exacerbation of the current problem of flooding in the locality of Fold Cottage and Court House, particularly during severe storm conditions.

An additional factor in the latter regard, and in the absence of main drainage in the area, will be the disposal of sewage from any new development. Such will likely require the

installation of full on-site sewage treatment plant and disposal of the treated effluent to ground (ie. via soakaway(s)). Whilst such volume of effluent will be relatively small in comparison with the quantities of surface water likely to originate from the site during severe rainfall events, it will further increase the potential for flooding in the locality of Fold Cottage nevertheless.

A side issue with regard to the provision of on-site sewage treatment plant(s) is the question of pollution. Whilst such treatment plant(s) should not be subject to risk of flooding, the treated effluent will most likely have to be discharged to ground as mentioned above and there is the risk that such effluent could contain a degree of pollution, not to mention the possible presence of pathogenic bacteria, the latter posing a potential health hazard. Subsequent percolation of the treated effluent through the ground should eliminate the latter hazard but one cannot be entirely sure unless facilities for disinfection of the treated effluent are installed also.

5. **MEASURES TO MINIMISE THE POTENTIAL FOR INCREASED FLOOD RISK**

Given the potential for increased flood risk in the locality of Fold Cottage, as outlined in Section 4 above, and given development of the proposed site is progressed in due course, measures will also need to be put in place to ensure that surface water run-off from the site is no greater than for the existing greenfield site. Such measures are unlikely to reduce the risk of flooding in the locality of Fold Cottage but at least such risk should not be increased.

The revised neighbourhood development plan as currently drafted does address some of these issues, namely, by recommending that should development of the proposed site be progressed the following requirements be addressed also :-

- That a flood risk assessment be undertaken, this to ensure there is no increase in surface water run-off from the site beyond current greenfield site flows and that opportunities to address existing storm water flooding problems should be taken where possible taking into account climate change.
- Developers should show, through appropriate evidence, that foul water drainage can be accommodated without causing pollution.
- Sustainable urban drainage systems (SUDs) should be utilised.

Such requirements are strongly to be advised, particularly that regarding the use of SUDs, these measures to include :-

- (1) The use of permeable paving materials (eg. for roadways, pavements, driveways and patios, etc.), as opposed to impermeable materials, such that rainwater can still percolate into the underlying ground minimising any surface water run-off.

- (2) The construction of swale(s), made by contouring the ground in the vicinity of the new development to form temporary ponds whereby rainwater run-off from impermeable areas (eg. roofs, etc.) and surcharges of surface water from paved areas on the site can be retained temporarily thus avoiding any increase in the rate of any overground run-off of surface water from the site during storm conditions. Such retained water to eventually drain away into the ground once the storm conditions have subsided.

- the object of these measures being to control the rate of any surface water run-off from the development site during storm conditions and ensuring that any surface water run-off which does occur is at least no greater than that for the existing greenfield site. Such is unlikely to do much to reduce the current risk of flooding in the locality of Fold Cottage and the surrounding area but at least such risk should not be increased.

6. **OVERALL CONCLUSIONS**

The overall conclusions from this outline assessment are as follows :-

- (1) Provided development of the proposed site meets certain criteria, as outlined in this report, these for the purpose of ensuring that the rate of run-off of surface water from the site is at least no greater than for the existing greenfield site, there appear to be no major grounds for objection to use of the proposed site for development purposes.
- (2) The proximity of the Elan Valley Aquaduct to the proposed site will place additional constraints on any development close to the route of the aquaduct, such constraints to prevent undue risk or damage to this facility will need to be as specified by Severn Trent Water Ltd.
- (3) Overall, given all the factors which need to be taken into account in allowing this site to be used for development purposes, it is considered that the advisability of such use is very much borderline and that, given the choice, it would probably be better on balance that such development not be progressed.

APPENDIX 1.

Location of proposed development site

Walford Policies Map



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Development Boundary



Housing Development

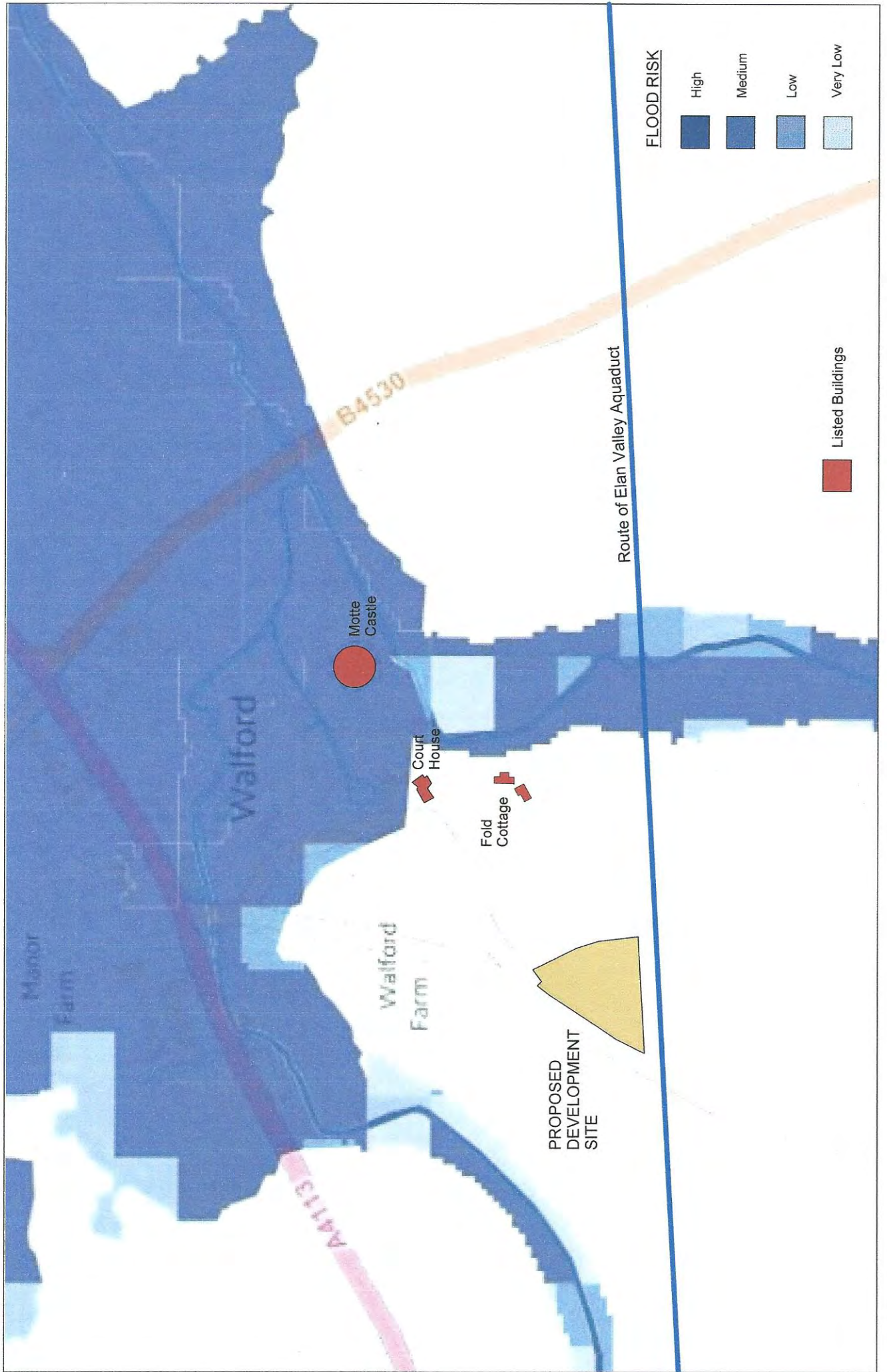


NOT TO SCALE

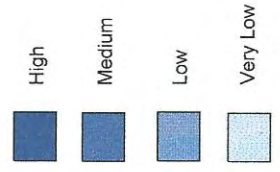


APPENDIX 2.

Area Flood Risk Map



FLOOD RISK



 Listed Buildings

Route of Eilan Valley Aquaduct

B4530

Motte Castle

Court House

Fold Cottage

Walford Farm

Walford

Manor Farm

A4113

PROPOSED DEVELOPMENT SITE

APPENDIX 3.

Photographs of Flooding in The Locality of Fold Cottage



Photograph 1 - Flooding of Access Lane



Photograph 2 - Flooding at Entrance to Fold Cottage



Photograph 3 - Entrance to Fold Cottage



Photograph 4 - Entrance to Fold Cottage



Photograph 5 - Flooding to Rear of Fold Cottage



Photograph 6 - Stream to Rear of Fold Cottage



Photograph 7. Earth Bund to Around Fold Cottage