

Latham, James

From: Turner, Andrew
Sent: 19 July 2018 15:29
To: Neighbourhood Planning Team
Subject: RE: Bosbury Regulation 16 (2nd Resubmission) neighbourhood development plan consultation

RE: Bosbury Regulation 16 (2nd Resubmission) neighbourhood development plan consultation

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 Ordnance survey historical plans, I would advise the following regarding the proposed 'Housing Site' (Policy 1B) indicated in brown on the "Bosbury Village Policies Map":

- Regarding the conversion of the existing redundant farm buildings at Old Court Farm. I would mention 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.
- Records indicate the proposed site is adjacent an area of land which has historically used and stored petrol tanks.

Due to the petrol tank site's proximity it's possible that unforeseen contamination may be present at the proposed site. Consideration should be given to the possibility of encountering contamination as a result of its former use and specialist advice be sought should any be encountered during the development.

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

Latham, James

From: Norman Ryan <Ryan.Norman@dwrwymru.com>
Sent: 27 July 2018 09:05
To: Neighbourhood Planning Team
Cc: Evans Rhys
Subject: RE: Bosbury Regulation 16 (2nd Resubmission) neighbourhood development plan consultation

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, we were consulted by the Parish Council as part of the Regulation 14 of the Neighbourhood Plan process and as such, have no further comment to make at this time.

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: 15 June 2018 09:47
Subject: Bosbury Regulation 16 (2nd Resubmission) neighbourhood development plan consultation

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

Dear Consultee,

Bosbury & Coddington Group 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/3033/bosbury_and_catley_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 15 June 2018 to 27 July 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 Team
Planning Services
PO Box 4
HR1 2ZB

By email only to: neighbourhoodplanning@herefordshire.gov.uk

Dear Sir/Madam,

This letter provides Gladman Developments Ltd (Gladman) representations in response to the submission version of the Bosbury Neighbourhood Plan (BNP) under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012. Gladman requests to be added to the Council's consultation database and to be kept informed on the progress of the emerging neighbourhood plan. This letter seeks to highlight the issues with the plan as currently presented and its relationship with national and local planning policy.

Legal Requirements

Before a neighbourhood plan can proceed to referendum it must be tested against a set of basic conditions set out in paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended). The basic conditions that the BNP must meet are as follows:

- (a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order.*
- (d) The making of the order contributes to the achievement of sustainable development.*
- (e) The making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).*
- (f) The making of the order does not breach, and is otherwise compatible with, EU obligations.*

Revised National Planning Policy Framework

On the 24th July 2018, the Ministry of Housing, Communities and Local Government published the revised National Planning Policy Framework. The first revision since 2012, it implements 85 reforms announced previously through the Housing White Paper.

Paragraph 214¹ of the revised Framework makes clear that the policies of the previous Framework will apply for the purpose of examining plans where they are submitted on or before 24th January 2019. Given the date of this consultation, the comments below reflect the relationship between Neighbourhood Plans and the National Planning Policy Framework adopted in 2012.

National Planning Policy Framework and Planning Practice Guidance

The National Planning Policy Framework (the Framework) sets out the Government's planning policies for England and how these are expected to be applied. In doing so it sets out the requirements for the preparation of neighbourhood plans to be in conformity with the strategic priorities for the wider area and the role in which they play in delivering sustainable development to meet development needs.

At the heart of the Framework is a presumption in favour of sustainable development, which should be seen as a golden thread through both plan-making and decision-taking. For plan-making this means that plan makers should positively seek opportunities to meet the development needs of their area and Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change. This requirement is applicable to neighbourhood plans.

The recent Planning Practice Guidance (PPG) updates make clear that neighbourhood plans should conform to national policy requirements and take account the latest and most up-to-date evidence of housing needs in order to assist the Council in delivering sustainable development, a neighbourhood plan basic condition.

The application of the presumption in favour of sustainable development will have implications for how communities engage with neighbourhood planning. Paragraph 16 of the Framework makes clear that Qualifying Bodies preparing neighbourhood plans should develop plans that support strategic development needs set out in Local Plans, including policies for housing development and plan positively to support local development.

Paragraph 17 further makes clear that neighbourhood plans should set out a clear and positive vision for the future of the area and policies contained in those plans should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency. Neighbourhood plans should seek to proactively drive and support sustainable economic development to deliver the homes, jobs and thriving local places that the country needs, whilst responding positively to the wider opportunities for growth.

Paragraph 184 of the Framework makes clear that local planning authorities will need to clearly set out their strategic policies to ensure that an up-to-date Local Plan is in place as quickly as possible. The Neighbourhood Plan should ensure that it is aligned with the strategic needs and priorities of the wider area and plan positively to support the delivery of sustainable growth opportunities.

Planning Practice Guidance

It is clear from the requirements of the Framework that neighbourhood plans should be prepared in conformity with the strategic requirements for the wider area as confirmed in an adopted development plan. The

¹ National Planning Policy Framework, paragraph 214

requirements of the Framework have now been supplemented by the publication of Planning Practice Guidance (PPG).

On 11th February 2016, the Secretary of State (SoS) published a series of updates to the neighbourhood planning chapter of the PPG. In summary, these update a number of component parts of the evidence base that are required to support an emerging neighbourhood plan.

On 19th May 2016, the Secretary of State published a further set of updates to the neighbourhood planning PPG. These updates provide further clarity on what measures a qualifying body should take to review the contents of a neighbourhood plan where the evidence base for the plan policy becomes less robust. As such it is considered that where a qualifying body intends to undertake a review of the neighbourhood plan, it should include a policy relating to this intention which includes a detailed explanation outlining the qualifying bodies anticipated timescales in this regard.

Further, the PPG makes clear that neighbourhood plans should not contain policies restricting housing development in settlements or preventing other settlements from being expanded. It is with that in mind that Gladman has reservations regarding the BNP's ability to meet basic condition (a) and (d) and this will be discussed in greater detail throughout this response.

Relationship to Local Plan

To meet the requirements of the Neighbourhood Plan Basic Conditions, neighbourhood plans should be prepared to conform to the strategic policy requirements set out in the adopted Development Plan.

The adopted development plan relevant to the preparation of the Bosbury Neighbourhood Plan area, and the development plan which the BNP will be tested against is the Herefordshire Core Strategy (HCS). This document was adopted in October 2015 and sets out the visions, objectives, spatial strategy and overarching policies to guide development in the Herefordshire from 2011 – 2031.

Policy SS2 sets out a minimum requirement of 16,500 homes that will be delivered over the plan period. There is a reliance on rural settlements including Bosbury to contribute 5,300 new homes that will be delivered through either neighbourhood planning or the emerging Rural Areas and Site Allocations Development Plan Document (RASA DPD). Policy RA1 of the HCS identifies an indicative housing growth target of 14% for the Ledbury HMA, inclusive of Bosbury. Policy SS3 determines that where housing completions fall below the annual requirement this could lead to one of the following mechanisms being introduced; a partial review of the Local Plan, preparation of new Development Plan Documents or utilising evidence from the Strategic Housing Land Availability Assessment to identify additional housing land. With this in mind and given that Herefordshire Council cannot demonstrate a 5-year supply, Gladman suggest sufficient flexibility is provided in the policies of the plan to safeguard the BNP from conflicting with future development proposals should they be required.

Bosbury Neighbourhood Plan

Gladman would like to take this opportunity to remind the Council that it is not within the remit of a Neighbourhood Plan to determine planning applications, and as such where reference is made in the plan to 'permitting' or 'refusing' development, Gladman suggest that the wording is amended to read 'supported' or 'not supported'.

Policy 1 – Village Character

Gladman submit that the policy as currently drafted lacks sufficient clarity and appropriate precision within the wording. Section 1a of the policy notes proportionate and sustainable developments within the settlement boundary will be permitted. Whilst noting the intentions of the policy to support development, the use of a settlement boundary to preclude otherwise sustainable development from coming forward does not accord with the positive approach to growth required by the Framework and is contrary to basic condition (a).

The introduction of a settlement boundary is also in direct conflict with HCS Policy RA2² which states sustainable housing growth will be supported in or adjacent to those settlements. The settlement boundary identified on the map on page 13 is tightly drawn and highly restrictive in nature. Given that there is shortfall of housing across the authority, and that the housing target of 42 is a minimum requirement for the NDP area, we suggest increased flexibility is drafted in to the policy, supporting that additional sites adjacent to the settlement boundary should be considered as appropriate to respond to future needs. Gladman note further development may be required due to deliverability issues on the large strategic sites around Hereford.

Policy 2 – Local Character

Policy 2 sets out a list of criteria that all proposals for residential development should adhere to.

Whilst Gladman recognise the importance of high quality developments, planning policies should not be overly prescriptive and need flexibility in order for schemes to respond to sites specifics and the character of the local area. There will not be a 'one size fits all' solution in relation to design and sites should be considered on a site by site basis with consideration given to various design principles.

Gladman therefore suggest that more flexibility is provided in the policy wording so the viability of a proposed development is not compromised by overtly prescriptive requirements. We suggest that regard should be had to paragraph 60 of the NPPF which states that: "Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles".

Policy 6-Biodiversity

Policy 6 states that all development should conserve, restore and enhance the biodiversity of the Parish.

Gladman recognise the intentions of this policy however note in its current form the that it lacks clarity and would compromise the decision makers ability to apply the policy effectively and with precision. We suggest regard is had to Paragraph 117 of the Framework which would ensure the policy is supported by proportionate and robust evidence demonstrating the ecological value of each identified features and habitats.

Conclusions

Gladman recognises the role of neighbourhood plans as a tool for local people to shape the development of their local community. However, it is clear from national guidance that these must be consistent with national planning policy and the strategic requirements for the wider authority area. Through this consultation response,

² Herefordshire Core Strategy – Section 4 Place Shaping, Policy RA2

Gladman has sought to clarify the relation of the BNP as currently proposed with the requirements of national planning policy and the wider strategic policies for the wider area.

Gladman is concerned that the plan in its current form does not comply with basic conditions (a) and (d). The plan does not conform with national policy and guidance and in its current form does not contribute to the achievement of sustainable development.

Gladman hopes you have found these representations helpful and constructive. If you have any questions do not hesitate to contact me or one of the Gladman team.

Yours Faithfully,

Andrew Collis

a.collis@gladman.co.uk

Gladman Developments Ltd.

Latham, James

From: Thomas, Patrick <Patrick.Thomas@highwaysengland.co.uk>
Sent: 20 June 2018 08:48
To: Neighbourhood Planning Team
Cc: Planning M
Subject: RE: Bosbury Regulation 16 (2nd Resubmission) neighbourhood development plan consultation

Dear Sirs,

Thank you for consulting Highways England on the above referenced Neighbourhood plan.

Highways England is responsible for the operation and maintenance of the Strategic Road Network in England. The network includes all major motorways and trunk roads in England.

I can confirm that Highways England have no comments to make on this consultation.

Regards
Patrick

Patrick Thomas, Asset Manager

Highways England | The Cube | 199 Wharfside Street | Birmingham | B1 1RN

Tel: +44 (0) 300 4703407 | **Mobile:** + 44 (0) 7500 099649

Web: <http://www.highways.gov.uk>

GTN: 0300 470 3407

From: Neighbourhood Planning Team [mailto:neighbourhoodplanning@herefordshire.gov.uk]
Sent: 15 June 2018 09:47
Subject: Bosbury Regulation 16 (2nd Resubmission) neighbourhood development plan consultation

Dear Consultee,

Bosbury & Coddington Group Parish Council have submitted their Regulation 16 (2nd Re-submission) Neighbourhood Development Plan (NDP) to Herefordshire Council for consultation.

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

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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



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: PL00050293

12 July 2018

Dear Mr Latham

BOSBURY NEIGHBOURHOOD PLAN - REGULATION 16 RE-CONSULTATION

Thank you for the invitation to comment again on the Regulation 16 Neighbourhood Plan. As noted in our previous consultation responses we are supportive of the content of the document, particularly its' emphasis on local distinctiveness and the protection of local rural landscape character and overall consider it to be a well-considered, concise and fit for purpose document.

In the current consultation Historic England also notes and endorses the support given to "proportionate and sustainable growth" and agrees that achieving this "must be more than an exercise in meeting housing supply numbers". Rather, housing must be provided in a manner that respects the character of the village and wider parish, as the Plan has consistently iterated throughout its various stages.

Beyond those observations we have no substantive further comments to make on what Historic England considers is a very 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 1TF

Telephone 0121 625 6870
HistoricEngland.org.uk



Latham, James

From: Duberley, Elizabeth
Sent: 03 July 2018 20:41
To: Neighbourhood Planning Team
Subject: RE: Bosbury NDP - Landscape Comments

Afternoon, Please find below landscape comments on Bosbury NDP:

- P4 *Vision It is accepted that the village needs to grow between now and 2031, but it is deemed essential that this happens slowly whilst retaining the unique and distinctive character of Bosbury.* Replace slowly – with gradually
- P 7 Village Character states *The landscape surrounding Bosbury retains a significant historic character of agriculture.* The meaning is unclear and it could be better worded, I would question the use of significant in this context.
- Policy 2 A *Respect the local character and historic and natural assets of the surrounding area, and take every opportunity, through design and materials, to reinforce local distinctiveness and a strong sense of place.* Reword – Respect the local character; its historic and natural assets...
- Policy 2B *Respect rural character and local landscape quality particularly the open landscape beyond the boundary of the Conservation Area.* Reword – Respect the surrounding local landscape character beyond the built form within the Conservation Area
- P11 *The intricate network of footpaths within the Parish, as well as the Hereford Way and The Old Canal at Swinmore –* Inaccuracy - Herefordshire Trail?
- Reference is made to important views within and out of Bosbury these should ideally be shown upon a map for clarity

Kind regards

Liz

Liz Duberley

Principal Natural Environment Officer | Built and Natural Environment Service
Economy, Communities and Corporate Services

Contact Details:

Tel 01432 260788 | 07792 880562

Mail Built and Natural Environment, Herefordshire Council, Plough Lane Offices, Plough Lane, Hereford HR4 0LE

@ Elizabeth.Duberley@herefordshire.gov.uk

Herefordshire.gov.uk

Latham, James

From: Knight, Matthew
Sent: 21 June 2018 10:55
To: Neighbourhood Planning Team
Subject: RE: Bosbury Regulation 16 (2nd Resubmission) neighbourhood development plan consultation

We have no comments on this.

From: Neighbourhood Planning Team
Sent: 15 June 2018 09:47
Subject: Bosbury Regulation 16 (2nd Resubmission) neighbourhood development plan consultation

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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)

ldf@herefordshire.gov.uk (for Strategic Planning enquiries)

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 attached files 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,

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

20 June 2018

Dear Sir / Madam

**Bosbury & Catley 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

Latham, James

From: Amos, Tom (NE) <Thomas.Amos@naturalengland.org.uk>
Sent: 18 June 2018 15:41
To: Neighbourhood Planning Team
Subject: Subject: Bosbury Regulation 16 (2nd Resubmission) neighbourhood development plan consultation - Natural England response

Dear Mr Latham,

Bosbury & Coddington Group Neighbourhood Plan - Regulation 16 Submission

Thank you for your consultation on the above dated 15/06/2018.

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
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.

Latham, James

From: Growth Development <GrowthDevelopment@severntrent.co.uk>
Sent: 18 June 2018 12:47
To: Neighbourhood Planning Team
Subject: RE: Bosbury Regulation 16 (2nd Resubmission) neighbourhood development plan consultation
Attachments: Bosbury Response.pdf

Dear Sir/Madam,

Thank you for giving Severn Trent Water the opportunity to comment on Bosbury Regulation 16 (2nd Resubmission) Neighbourhood Development Plan consultation.

We currently have no specific comments to make however, please keep us informed as your plans develop and when appropriate we will be able to offer a more detailed comments and advice.

We have attached some general information and advice for your information.

Best Wishes,

Rebecca McLean

Sewerage Management Planning (SMP) – Strategic Catchment Planner
Infra Business Planning
Severn Trent
Email: Growth.Development@severntrent.co.uk

WONDERFUL ON TAP



From: Neighbourhood Planning Team [mailto:neighbourhoodplanning@herefordshire.gov.uk]
Sent: 15 June 2018 09:47
Subject: Bosbury Regulation 16 (2nd Resubmission) 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.

18 June 2018

Our ref: Herefordshire 22

Dear Sir/Madam

Bosbury Regulation 16 (2nd Resubmission) 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

Strategic Catchment Planner

growth.development@severntrent.co.uk

Latham, James

From: Planning Central <Planning.Central@sportengland.org>
Sent: 29 June 2018 09:28
To: Neighbourhood Planning Team
Subject: Bosbury and Coddington Neighbourhood Plan

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

It is noted that Policy 4 opposes the loss of amenities (including the recreation ground, and tennis and bowls club) unless material evidence can justify the loss. There are therefore mitigating circumstances or the approval for development, however, it is unclear exactly what these circumstances are. This policy should be reworded to specifically provide the playing field with protection in line with P.74 of the NPPF.

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 Parts 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 Part 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



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