

Neighbourhood Planning Team

From: Turner, Andrew
Sent: 13 September 2022 10:49
To: Neighbourhood Planning Team
Subject: RE: Edwyn Ralph Regulation 16 submission neighbourhood development plan consultation

RE: Edwyn Ralph Regulation 16 Neighbourhood Development Plan

Dear Neighbourhood Planning Team,

I refer to the above and would make the following comments with regard to the above proposed development plan.

It is my understanding that you do not require comment on Core Strategy proposals as part of this consultation or comment on sites which are awaiting or have already been granted planning approval.

Having reviewed records readily available, I would advise the following regarding 'Policy ER 6 – Housing allocation' indicated in orange on Map 4.

Site 3 – Top Paddock, The Manor

- Historical maps from 1972 indicate a former garage was located immediately adjacent (west) the proposed housing allocation site.
- The proposed housing allocation is a site which historical maps from up to 1964 indicate is located immediately adjacent (east) a former quarry. The area has subsequently been classed as unknown filled ground.

Sites identified as unknown filled ground can be associated with contaminative fill material. In practice, many sites identified through the historical mapping process as unknown filled ground are instances where hollows have been made level with natural material, have remained as unfilled 'hollows' or have filled through natural processes. However, there are some instances where the nature of the fill is not inert and would require further investigation. Without any additional information it is not possible to comment further on this site. Any additional information you may be able to obtain will help in determining the exact nature of the site.

The two adjacent sites historic potentially contaminative uses will require consideration prior to any development.

Any future redevelopment of the site would be considered by the Planning Services Division of the Council however, if consulted it is likely this division would recommend any application that is submitted should include, as a minimum, a 'desk top study' considering risk from contamination in accordance with BS10175:2011 so that the proposal can be fully considered. With adequate information it is likely a condition would be recommended such as that included below:

1. No development shall take place until the following has been submitted to and approved in writing by the local planning authority:
 - a) a 'desk study' report including previous site and adjacent site uses, potential contaminants arising from those uses, possible sources, pathways, and receptors, a conceptual model and a risk assessment in accordance with current best practice

- b) if the risk assessment in (a) confirms the possibility of a significant pollutant linkage(s), a site investigation should be undertaken to characterise fully the nature and extent and severity of contamination, incorporating a conceptual model of all the potential pollutant linkages and an assessment of risk to identified receptors
- c) if the risk assessment in (b) identifies unacceptable risk(s) a detailed scheme specifying remedial works and measures necessary to avoid risk from contaminants/or gases when the site is developed shall be submitted in writing. The Remediation Scheme shall include consideration of and proposals to deal with situations where, during works on site, contamination is encountered which has not previously been identified. Any further contamination encountered shall be fully assessed and an appropriate remediation scheme submitted to the local planning authority for written approval.

Reason: In the interests of human health and to comply with policy SD1 of the Herefordshire Local Plan – Core Strategy and the National Planning Policy Framework.

2. The Remediation Scheme, as approved pursuant to condition no. (1) above, shall be fully implemented before the development is first occupied. On completion of the remediation scheme the developer shall provide a validation report to confirm that all works were completed in accordance with the agreed details, which must be submitted and agreed in writing before the development is first occupied. Any variation to the scheme including the validation reporting shall be agreed in writing with the Local Planning Authority in advance of works being undertaken.

Reason: In the interests of human health and to comply with policy SD1 of the Herefordshire Local Plan – Core Strategy and the National Planning Policy Framework.

3. If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the local planning authority) shall be carried out until the developer has submitted, and obtained written approval from the local planning authority for, an amendment to the Method Statement detailing how this unsuspected contamination shall be dealt with.

Reason: In the interests of human health and to comply with policy SD1 of the Herefordshire Local Plan – Core Strategy and the National Planning Policy Framework.

Technical notes about the condition

1. Assessment is required to be undertaken in accordance with good practice guidance and needs to be carried out by a suitably competent person as defined within the National Planning Policy Framework 2019.
2. All investigations of potentially contaminated sites are required to undertake asbestos sampling and analysis as a matter of routine and this should be included with any submission.
3. Where ground gas protection measures are required, they shall be validated in accordance with current best practice guidance.

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 & Environment Directorate
Direct Tel: 01432 260159
Email: aturner@herefordshire.gov.uk



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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 and Strategic Planning
Herefordshire Council

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

13 September 2022

Dear Neighbourhood Planning and Strategic Planning teams

(2) Edwyn Ralph - Neighbourhood Plan Regulation 14

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

Neighbourhood Planning Team

From: Ryan Norman <Ryan.Norman@dwrwymru.com>
Sent: 12 September 2022 16:36
To: Neighbourhood Planning Team
Subject: RE: Edwyn Ralph Regulation 16 submission neighbourhood development plan consultation
Attachments: RE: Edwyn Ralph Neighbourhood Plan

This message originated from outside of Herefordshire Council or Hoople. Please do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Sir/Madam,

Thanks for consulting Welsh Water on the below.

We were consulted as part of the Reg 14 consultation and I have attached this representation for your information. We have no further comments to make.

Kind regards,



Ryan Norman

Development Growth Manager | Developer Services |
Dŵr Cymru Welsh Water

T: 0800 917 2652 | E: 40719 | M: 07557812548

A: PO Box 3146, Cardiff, CF30 0EH



W: dwrwymru.com

E: developer.services@dwrwymru.com

Neighbourhood Planning Team

From: Ryan Norman <Ryan.Norman@dwrwymru.com>
Sent: 03 February 2022 10:08
To:
Subject: RE: Edwyn Ralph Neighbourhood Plan

Follow Up Flag: Follow up
Flag Status: Flagged

Good morning Mr Culley,

Thanks for consulting Welsh Water on the below.

Given the Neighbourhood Plan has been prepared in line with the provisions of the Herefordshire Core Strategy we support the proposals set out.

As you will be aware, Welsh Water are responsible for the potable water supply to the Neighbourhood Plan area, and provide a public sewerage system within the settlement of Edwyn Ralph itself.

It is vital that there is sufficient capacity within both our water supply and public sewerage systems to accommodate new development, and as such we welcome the provisions of criterion 3 of Policy ER1.

With regard to the proposed allocated housing site (Top Paddock, The Manor) there are no issues in providing the site with a supply of clean water. Should the site wish to connect to the public sewerage network there are no issues, aside from the requirement to provide offsite sewers.

I trust the above is useful, but if you require further information please let me know.

Kind regards,



Ryan Norman

Lead Forward Plans Officer | Developer Services |
Dŵr Cymru Welsh Water

T: 0800 917 2652 | E: 40719 | M: 07557812548

A: PO Box 3146, Cardiff, CF30 0EH



W: dwrwymru.com



E: developer.services@dwrwymru.com

Neighbourhood Planning Team

From: Dean Gibbard
Sent: 22 August 2022 17:44
To: Neighbourhood Planning Team
Subject: Edwyn Ralph Neighbourhood plan

This message originated from outside of Herefordshire Council or Hoople. Please do not click links or open attachments unless you recognise the sender and know the content is safe.

Objection to the proposed plan for REDACTED

Dear Planning team

We have just been informed of the proposed scheme for the Neighbourhood plan for our Parish Edwyn Ralph.

The proposed plan indicates that our permitted development rights would be affected and would be reduced. This appears to be done in a way which is uncharacteristic to the neighbours permitted develop rights which has not been changed. We believe this has been done unfairly and would certainly object to this application without the permission from ourselves to reduce our permitted development rights.

The development rights should be in line with our neighbours and should remain in line with REDACTED as before.

The Neighbourhood plan shows our boundary incorrectly plotted and needs to be modified, as per land registry documents. REDACTED.

We would hope a swift response to our concerns and would like to make a formal objection to these parts of the plan.

Your sincerely

Mr & Mrs Gibbard

Sent from my iPhone

Neighbourhood Development Plan (NDP) – Core Strategy Conformity Assessment

From Herefordshire Council Strategic Planning Team

Name of NDP: Edwyn Ralph Regulation 16

Date: 14/09/22

Draft Neighbourhood plan policy	Equivalent CS policy(ies) (if appropriate)	In general conformity (Y/N)	Comments
ER 1: Promoting a Sustainable Community	SS1; SS2; SS4; SS5; SS6; RA2; RA6; MT1; E3; LD1	Y	
ER 2: Development Strategy	SS2; RA2; RA3; RA4; RA5	Y	
ER 3: Protecting and enhancing Local Character	SS6; LD1; LD2	Y	
ER 4: Heritage Assets	LD4	Y	
ER 5: The scale of new housing	RA2; RA3; H1;H2	Y	
ER 6: Housing allocation	RA2; RA3; H1; H2	Y	
ER 7: Housing in the countryside	RA3, RA4, RA5; H2	Y	
ER 8: Extensions to dwellings	SD1	Y	
ER 9: Design of new housing	LD1, SD1-SD4	Y	
ER 10: Ensuring an appropriate range of tenures, types and sizes of houses	H3	Y	

Draft Neighbourhood plan policy	Equivalent CS policy(ies) (if appropriate)	In general conformity (Y/N)	Comments
ER 11: Affordable housing	H1	Y	
ER 12: Business development	RA6, E4, E6	Y	
ER 13: Protection of existing commercial business premises	E2	Y	
ER 14: Agriculture and forestry enterprises	RA6	Y	
ER 15: Transport and connectivity	SS4; MT1	Y	
ER 16: Enhanced Services and Facilities for the Community	SC1	Y	
ER 17: Protection of community facilities	SC1	Y	
ER 18: Broadband and mobile telephone infrastructure	N/A	Y	
ER 19: Renewable Energy	SD2	Y	

Other comments/conformity issues:

The plan is in general conformity with the policies of the Core Strategy and Strategic Planning therefore raises no objections to this NDP.

Herefordshire Council
Forward Planning
PO Box 4
Hereford
Herefordshire
HR4 0XH

Our ref: SV/2022/111226/SD-
02/IS1-L01

Your ref:

Date: 30 August 2022

FAO: James Latham

Dear James

EDWYN RALPH REGULATION 16 NEIGHBOURHOOD PLAN

I refer to your email of 2nd August 2022 in relation to the Edwyn Ralph Regulation 16 Neighbourhood Development Plan (NDP). We have reviewed the Regulation 14 draft in February 2022.

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 NDP 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. Herefordshire Council are shortly to begin the Local Plan review process including updates to the evidence base.

Flood Risk: With regards to Flood Risk, there are no main rivers present in the Edwyn Ralph Neighbourhood Plan Area, there are however, several ordinary watercourses.

Our Flood Map primarily show flooding from Main Rivers, not ordinary watercourses, or un-modelled rivers, with a catchment of less than 3km². As such it should not be assumed that these smaller ordinary watercourses do not have floodplains and there may be slightly more of the site affected by flood risk than is immediately expected just from reference to the Flood Zone Mapping. Therefore, some assessment of flood risk associated with these unmodelled watercourses may be necessary as part of any supporting evidence base carried out for the NDP area if development is proposed in/adjacent to such locations.

It should be noted that our Flood Map provides an indication of 'fluvial' flood risk only. You are advised to discuss matters relating to surface water (pluvial) flooding

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

Cont/d..

with the drainage team at Herefordshire Council as the Lead Local Flooding Authority (LLFA).

Site Allocation: We note the inclusion of a housing site (Top Paddock, The Manor) in Policy ER6. We would not, in the absence of specific sites allocated within areas of fluvial flooding, offer a bespoke comment on flood risk at this time. However, it should be noted that the Flood Map provides an indication of 'fluvial' flood risk only. You are advised to discuss matters relating to surface water (pluvial) flooding with the drainage team at Herefordshire Council.

River Wye SAC Catchment: It is noted that Edwyn Ralph falls within the River Lugg Sub-catchment and that an AA has been undertaken in light of recent comments from Natural England (NE). As confirmed within the AA document the most significant issue within the River Wye SAC Catchment (included the River Lugg) relates to water quality and the potential impact of policies and site allocations within the NDP's.

We have previously provided comment on similar NDPs' with a view to ensuring a robust submission and that development can be achieved without impact on the integrity of the SAC, primarily within the Lugg Catchment.

The AA correctly confirms that Herefordshire Council are seeking to progress mitigation measures, including integrated wetlands, to assist in the reduction of phosphate levels and with a view to resolving water quality issues within the County, specifically the Lugg Sub-catchment.

It is noted, and welcomed, that the NDP includes a specific Policy section on the River Wye Special Area of Conservation and that **Policy ER3 – part 9** now makes specific reference to impacts on the Catchment, including the need for nutrient neutrality and mitigation measures to secure such. The Phosphate Budget Calculator Tool, and associated guidance, referenced in the Policy and is an important tool with regards to the Nutrient Neutrality issues within the Catchment.

In consideration of the above Herefordshire Council should be satisfied, in consultation with NE, as the primary consultation body on this matter, that this approach, including possible mitigation, is a viable and deliverable and that there is a reasonable degree of certainty provided to take forward the sites in the plan.

I trust that the above is of assistance, please feel free to contact me if you would like to discuss our response.

Yours faithfully

Mr. Matt Bennion
Planning officer

Direct dial 07810 774218
Direct e-mail matthew.bennion@environment-agency.gov.uk

End



Historic England

Mr James Latham
Herefordshire Council
Neighbourhood Planning & Strategic Planning
Plough Lane
Hereford
Herefordshire
HR4 0LE

Direct Dial: 0121 625 6887

Our ref: PL00761242

15 August 2022

Dear Mr Latham

EDWYN RALPH NEIGHBOURHOOD PLAN - REGULATION 16 CONSULTATION.

Thank you for the invitation to comment on the Submission Neighbourhood Plan.

Historic England is supportive of both the content of the document and the vision and objectives set out in it.

Our previous comments on the Regulation 14 consultation remain entirely relevant, that is:

“We are pleased to note that the Plan evidence base is well informed by reference to the Herefordshire Historic Environment Record and includes extensive analysis of the historic landscape of the Parish through a bespoke Character Study. All of this provides a context and a sound evidence base for well thought out Plan policies.

The emphasis on the conservation of local distinctiveness and variations in local character through good design and the protection of locally significant buildings, historic farmsteads and landscape character including key views and archaeological remains is to be applauded.

Overall Historic England considers that the plan reads as a comprehensive, well written and well-considered document which is eminently fit for purpose. We consider that the Plan takes an exemplary approach to the historic environment of the Parish and that it constitutes a very good example of community led planning.

Those involved in the production of the Plan should be congratulated”.

I hope you find these comments and advice helpful.

Yours sincerely,

P. Boland.



THE FOUNDRY 82 GRANVILLE STREET BIRMINGHAM B1 2LH

Telephone 0121 625 6888
HistoricEngland.org.uk





Historic England

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

cc:



THE FOUNDRY 82 GRANVILLE STREET BIRMINGHAM B1 2LH

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

Neighbourhood Planning Team

From:
Sent: 13 September 2022 15:02
To: Neighbourhood Planning Team
Subject: Edwyn Ralph draft Neighbourhood Plan
Attachments:

This message originated from outside of Herefordshire Council or Hoople. Please do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Sirs

Please find my comments on the draft submission of the Edwyn Ralph Neighbourhood Plan.

Yours faithfully
John Needham

John Needham Associates

**EDWYN RALPH NEIGHBOURHOOD PLAN
RESPONSE TO DRAFT SUBMISSION JULY 2022**

1. Background

1.1. The population of Edwyn Ralph has fallen by 22 people since 2001 as a result of planning policies by the previous authority, Malvern Hills District Council, and latterly by Herefordshire Council. If the natural increase in population had only been maintained to what it was in 2001 then on the basis of 2.3 persons per dwelling a further 5.22 dwellings should be added to the projected figure of 17 new homes. i.e. The Neighbourhood Plan should be looking at a figure of 22 new homes of which

1.2. "Working from home" has been increasing for many years but has been acknowledged more so over the last two years. Nevertheless, the Council still makes no allowance for an extra room to make this lifestyle successful. Existing houses in Edwyn Ralph are mainly detached and of low density and allow the facility to work from home.

2. Vision and objectives

2.1. The draft N P claims that it sets out to retain the village's tranquil rural character, its historic buildings, natural habitats, trees and woodlands and expansive vistas and improve road safety.

3. Site Selection.

Site 3

It has to be asked, therefore, how choosing Site 3 can possibly do any of the above.

3.1. It is on the wrong side of the bend to form an access and the construction of a new access to comply with highway regulations will have a severe detrimental impact on the approach into the village.

3.2. The site is only within the suggested development boundary because the obvious natural boundary to the village has been extended into open countryside to include it.

- 3.3. The site is admitted by the owner to have a contamination warning on it raised in the land search when the site was purchased.
- 3.4. The site lies adjacent to the access to the Listed Building, The Manor, and hence severely impacts on the setting of that Listed Building.
- 3.5. The site is therefore said to require significant landscape mitigation to integrate it with the Listed Building. Other sites would require less.
- 3.6. There is a strong band of mature trees along the northeastern boundary of the access to The Manor which forms an important and natural end to development and will be unnecessarily lost.
- 3.7. Inspectors' have objected to new development taking place within the vision of the Hereford Trail. This site is within this vision and also fails this test.
- 3.8. The site also falls within the "Eastern Setting" Character Area in the Neighbourhood Plan Characterization Assessment. It therefore has an open character which makes it highly sensitive to new development. This has been ignored.

This site really has to be the most unsuitable site put forward because of

- Its impact on a listed building
- Building in open countryside
- Impact on the Herefordshire Trail & Footpath E27
- Contaminated land
- Serious visibility restrictions on a blind bend.
- Impact on the entrance to the village.

Site 1

3.9. Site 1 has most of the disadvantages of Site 3 in that it would seriously alter the entrance into the village.

Site 2 has been seriously misrepresented in the document.

3.10 The land available for development is less than 50% of the site indicated as Site 2. Attached is a plan showing the land which is available for development.

- 3.11. The NDP Group are well aware that an Inspector has granted permission for the conversion of a barn to a dwelling within the area shown as Site 2. This was despite a concerted effort by the Parish Council and members of the above group to ensure that it did not happen. Nevertheless the permission was granted and it is not indicated within the Development Plan boundary.
- 3.12. Also, the land between Meadowcroft and the public footpath REDACTED.
- 3.13. The land below the public footpath opposite Meadowcroft REDACTED. Edwyn Wild is a group of local people who are forming a wildlife area for community use with grant aid.
- 3.14. The land between Site 2 and the road is shown as open space but in fact all the road frontage is dwellings.
- 3.15. Site 2 would only be large enough to build 2 No. x 3 bed, 1 No. x 4 bed houses and 1 No. x 2 bed bungalow. A total of 4 dwellings.
- 3.16. The draft Plan refers to Edwyn Ralph as being a linear village. In fact only approximately 40% of the dwellings in Edwyn Ralph are linear along the B4214 and 60% of the dwellings are backland. Surprisingly the extent of backland development in a north westerly direction along Wood Lane is exactly the same length as the linear development along the B4214.

Consequently Site 2 has all the advantages listed in the NDPs Visions and Objectives that Site 3 does not have.

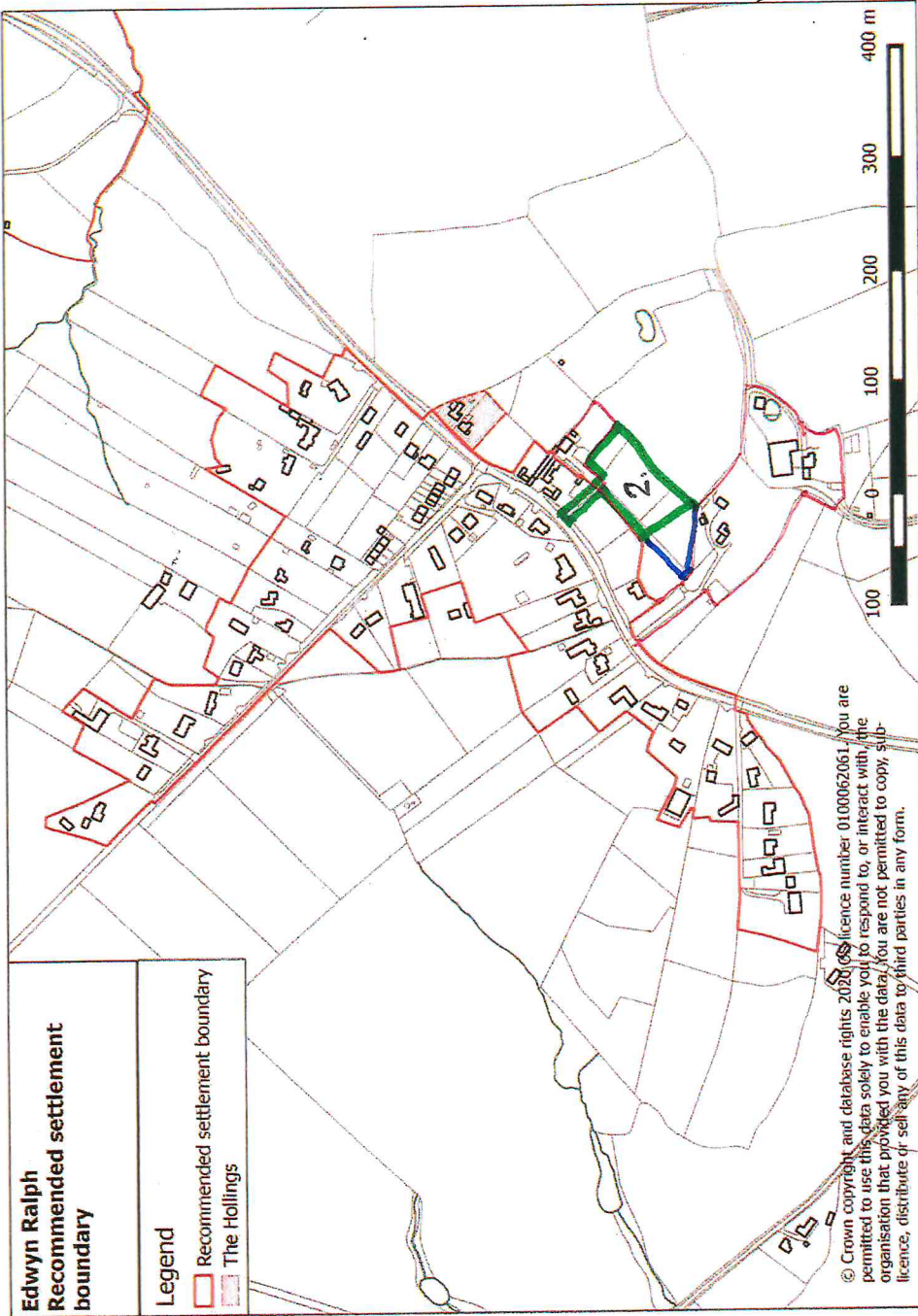
1. Site 2 will be completely hidden by existing development and have no impact whatsoever on Edwyn Ralph and particularly the entrance at either end of the village.
2. The floor levels of the dwellings will be 7 metres or thereabouts below road level resulting in the dwellings being out of sight. BEA Landscape's Report confirms that from distant views in the opposite direction no new housing on Site 2 would be seen above the backcloth of existing housing. The report is too large to attach but can be seen on Herefordshire Council's planning website under Ref. 192165, appeal documents, Landscape Appraisal.
3. Site 2 has an existing access and private drive which already serves the land and barn conversion. There will be no impact of a new access. The existing access is already approved for development of the site by the Council's Highways Officer.

4. Site 2 is not in a Conservation Area, an Area of Outstanding Natural Beauty nor in an area of great landscape value. This is all confirmed in the Planning Officer's report dated 6th January 2017, again available on the Council's website.
5. The site was previously used as paddocks and for sheep but is now redundant. It has no value as agricultural land and already has housing on its southern, western and northern boundaries.
6. It is difficult to understand, therefore, why it is considered that Site 3 which is a paddock adjacent to the access to The Manor should have no impact on a heritage asset and yet it is claimed Site 2 which is separated by a wildlife park and garden to Meadowcroft from The Manor would have an impact.
7. There is backland development of an industrial site to the southeast of Site 2.
8. For some reason The Manor and this industrial site are excluded from being within the development boundary. Clearly this is a mistake.
9. Attached is a plan which would appear more accurately to represent the existing development boundary in the area of Site 2 & Site 3.

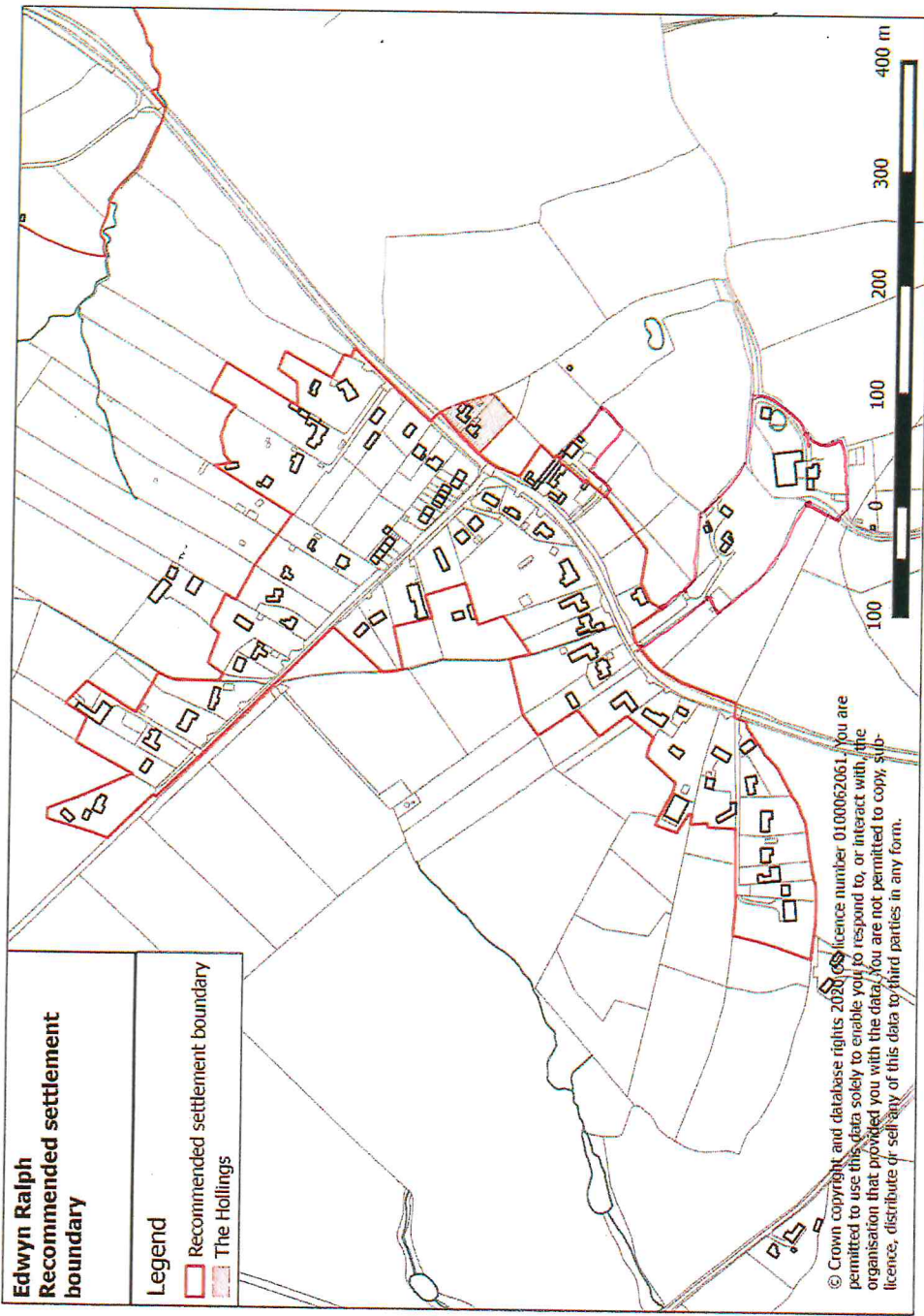
Site 5

This is an ideal site for two small affordable type dwellings, but if only two dwellings are to be added to Site 3 and these are to be restricted in size then Edwyn Ralph is being denied the sort of housing that people appear to want to attract them to live in the village.

But if Site 2 were to be added to Site 5 bringing the total to six this would seem to give a complete range of houses that the village requires if it is to remain sustainable.



I.



2.

Our Ref: MV/ 15B901605



13 September 2022

Herefordshire Council
neighbourhoodplanning@herefordshire.gov.uk
via email only

Dear Sir / Madam

**Edwyn Ralph Neighbourhood Plan Regulation 16 Consultation
August – September 2022
Representations on behalf of National Grid**

National Grid has appointed Avison Young to review and respond to Neighbourhood Plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

About National Grid

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators across England, Wales and Scotland.

National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.

National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.

Proposed development sites crossed or in close proximity to National Grid assets:

An assessment has been carried out with respect to National Grid's electricity and gas transmission assets which include high voltage electricity assets and high-pressure gas pipelines.

National Grid has identified that no assets are currently affected by proposed allocations within the Neighbourhood Plan area.

National Grid provides information in relation to its assets at the website below.

- www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/

Please also see attached information outlining guidance on development close to National Grid infrastructure.



Distribution Networks

Information regarding the electricity distribution network is available at the website below:

www.energynetworks.org.uk

Information regarding the gas distribution network is available by contacting:

plantprotection@cadentgas.com

Further Advice

Please remember to consult National Grid on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets. We would be grateful if you could add our details shown below to your consultation database, if not already included:

Matt Verlander, Director

nationalgrid.uk@avisonyoung.com

Avison Young
Central Square South
Orchard Street
Newcastle upon Tyne
NE1 3AZ

Spencer Jefferies, Town Planner

box.landandacquisitions@nationalgrid.com

National Grid
National Grid House
Warwick Technology Park
Gallows Hill
Warwick, CV34 6DA

If you require any further information in respect of this letter, then please contact us.

Yours faithfully,

Matt Verlander MRTPI

Director

0191 269 0094

matt.verlander@avisonyoung.com

For and on behalf of Avison Young

National Grid is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Electricity assets

Developers of sites crossed or in close proximity to National Grid assets should be aware that it is National Grid policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

National Grid's '*Guidelines for Development near pylons and high voltage overhead power lines*' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: <https://www.nationalgridet.com/document/130626/download>

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

National Grid's statutory safety clearances are detailed in their '*Guidelines when working near National Grid Electricity Transmission assets*', which can be downloaded here: www.nationalgridet.com/network-and-assets/working-near-our-assets

Gas assets

High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Grid's approach is always to seek to leave their existing transmission pipelines in situ. Contact should be made with the Health and Safety Executive (HSE) in respect of sites affected by High-Pressure Gas Pipelines.

National Grid have land rights for each asset which prevents the erection of permanent/temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Grid's 12.2m building proximity distance, and a deed of consent is required for any crossing of the easement.

National Grid's '*Guidelines when working near National Grid Gas assets*' can be downloaded here: www.nationalgridgas.com/land-and-assets/working-near-our-assets

How to contact National Grid

If you require any further information in relation to the above and/or if you would like to check if National Grid's transmission networks may be affected by a proposed development, please visit the website: <https://lsbud.co.uk/>

For local planning policy queries, please contact: nationalgrid.uk@avisonyoung.com

Date: 24 August 2022
Our ref: 403390
Your ref: None



James Latham
Herefordshire Council

neighbourhoodplanning@herefordshire.gov.uk

Customer Services
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BY EMAIL ONLY

Dear Mr Latham

Edwyn Ralph Neighbourhood Development Plan – Regulation 16 consultation

Thank you for your consultation on the above dated 02 August 2016 which was received by Natural England on the same date.

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.

The Edwyn Ralph Neighbourhood Plan area is within the catchment of the River Lugg part of the [River Wye Special Area of Conservation \(SAC\)](#), which is a European designated site (also commonly referred to as Natura 2000 sites), and therefore has the potential to affect its interest features. European sites are afforded protection under the Conservation of Habitats and Species Regulations 2017, as amended (the 'Habitats Regulations'). The SAC is notified at a national level as the River Lugg Site of Special Scientific Interest (SSSI).

An appropriate assessment has been undertaken, in accordance with Regulation 63 of the Conservation of Species and Habitats Regulations 2017 (as amended). Natural England is a statutory consultee on the appropriate assessment stage of the Habitats Regulations Assessment process, and a competent authority should have regard to Natural England's advice.

On 18 July 2022, Natural England wrote to Herefordshire Council regarding the approach to Neighbourhood Plans in the River Lugg catchment. We advised that Neighbourhood Plans in the Lugg catchment could not rely on the adopted Core Strategy or the Nutrient Management Plan as mitigation. We advised instead that the plan could either pause, or require housing development to be nutrient neutral.

The submission draft of the Edwyn Ralph Neighbourhood Plan includes Policy ER3 Protecting and Enhancing Local Character, which states:

9. Demonstrate that the proposal will not have an adverse effect on the River Wye Special Area of Conservation ("SAC") and species of European importance. In particular, planning permission will only be granted if it is shown so that the planning authority can be certain that the proposal will not increase nutrient inputs to the SAC. This could include through the delivery of mitigation to make a proposal nutrient neutral. Reference should be made to Herefordshire Council's Phosphate calculator and associated guidance.

With the inclusion of this policy and the updated Habitat Regulations Assessment, Natural England agrees that the plan will have no adverse effect on the integrity of the River Wye SAC.

NE had suggested that the plan should be as specific as it could be, to ensure deliverability and to maximise opportunities for biodiversity gain and local community benefits. The HRA sets out that this is not possible. Natural England is content with the LPA's approach, although we hope this might be revisited as a part of Local Plan writing process and subsequent Neighbourhood Plans.

I hope this response is of assistance. Please send further correspondence, marked for my attention, to consultations@naturalengland.org.uk quoting our reference above.

Yours sincerely

Hayley Fleming
West Midlands Area Team

Neighbourhood Planning Team

From: HINDLE, Joanna (NHS HEREFORDSHIRE AND WORCESTERSHIRE ICB - 18C)
<joanna.hindle3@nhs.net>
Sent: 04 August 2022 09:11
To: Neighbourhood Planning Team
Subject: RE: Edwyn Ralph Regulation 16 submission neighbourhood development plan consultation

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Good Morning,

Thank you for notifying NHS Herefordshire & Worcestershire Integrated Care Board (ICB) of the Thornbury Group Parish Council Regulation 16 Neighbourhood Development Plan consultation.

NHS Herefordshire & Worcestershire ICB has no direct comment on the plan, but welcomes the Community Action for the Parish Council's "Proposals to provide broadband infrastructure and mobile telephone equipment infrastructure", which is of benefit to the provision of healthcare into rural communities.

Kind Regards,

Jo Hindle

Primary Care Contracts Officer

NHS Herefordshire and Worcestershire

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Neighbourhood Planning Team

From: Sally Price
Sent: 04 August 2022 18:38
To: Neighbourhood Planning Team

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Hi I would like to go against the planning in Edwin Ralph, REDACTED, Thanks Sally price