

Date: 03 July 2015
Our ref: 154621
Your ref: Callow and Hallow Group Group Neighbourhood Plan



Mr J Latham
Herefordshire Council
Planning Services,
Blueschool House,
Blueschool Street
Hereford,
HR1 2ZB

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

BY EMAIL ONLY

T 0300 060 3900

Dear Mr Latham

Re: Callow and Hallow Group Neighbourhood Development Plan (NDP), SEA and HRA-Regulation 16

Thank you for your consultation on the above dated and received by Natural England on 22 May 2015.

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.

Callow and Hallow Group Neighbourhood Plan

The NDP relies on policies of the as yet un-adopted Herefordshire Local Plan. Until such time as the Herefordshire Local Plan is adopted the plan, policies within it cannot be relied upon to ensure the NDP will not have a likely significant effect. As a consequence, we disagree with the conclusions of the HRA of the NDP. In order to conclude that the NDP will not have a likely significant effect, we advise that either the NDP is adopted only after the Herefordshire Local Plan is adopted, or suitable policies are included within the NDP. We acknowledge that policies have already been amended, however we advise that policies CH4, CH8 and CH9 need further strengthen.

CH1- protecting and enhancing the rural Landscape

We support this policy, however we advise splitting criterion 6 to make this clearer. We suggest the following:

6. Development should include designs which support habitats for local species such as dormice, hares and barn owls.

7. Developments must demonstrate that they will not have an adverse impact on the natural environment, and in particular on the river wye special area of conservation (SAC).

Policy CH4 - Protecting the sensitive landscape assets in the urban fringe

We welcome this policy in terms of the approach to sensitive landscape assets. However, we suggest strengthening the wording in relation to the River Wye SAC as follows:

“Development that will have an adverse effect on the River Wye SAC will not be permitted. Development should include appropriate landscape designs to ensure that any potential impacts on locally important wildlife habitats are minimised”. We also recommend that a bullet point is added



which stipulates that development will only be permitted when it does not compromise the ability of the nutrient management plan to deliver the necessary overall nutrient reductions along those stretches of the River Wye SAC which are already exceeding water quality targets.

Policy CH8 - Provision and protection of local community facilities

We advise rewording this policy to strengthen it and make it clearer:

“Proposals for new community facilities such as village halls, community gardens and greens and meeting spaces will be supported in principle. development proposals should be sited in locations which have no adverse impact on the River Wye SAC and the natural environment.”

Policy CH9 – Local Needs Housing

We advise rewording criterion that makes reference to the SAC so that “development will not have an adverse impact on the River Wye SAC/ SSSI and the natural environment.”

Habitats Regulations Assessment (HRA) Report, Addendum and Second Addendum

In Section 6 of the HRA and section 3 of the Second Addendum, it appears the basis for the conclusion that there will be no likely significant effect from the NDP, in combination with the proposed Main Modifications to the Herefordshire Local Plan (Core Strategy), is that in combination effects have been ruled out as the NDP aligns with the draft Local Plan.

The draft Local Plan has not yet been adopted and both it, and its HRA, are therefore liable to further changes. Given this, relying on the draft Local Plan to avoid or mitigate any potential impact is not considered sufficient to be certain of avoiding impact at this stage. The NDP’s HRA may, of course, rely on the evidence supporting the Local Plan’s HRA to draw conclusions as to whether the policies in the plan will have significant effects on the River Wye Special Area of Conservation (SAC).

Callow and Hallow Group Environment Report

Natural England welcomes the production of an Environmental Report. Having reviewed the report Natural England confirms that it meets the requirements of the Strategic Environmental Assessment (SEA) European Directive and national regulations, and that we concur with its conclusions.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact Gillian Driver on 0300 060 4335. For any new consultations, or to provide further information on this consultation please send your correspondences to 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

Gillian Driver

Miss Gillian Driver
Planning Lead Adviser
South Mercia Team

James Latham – Technical Support Officer
Neighbourhood Planning, Strategic Planning &
Conservation teams
Herefordshire Council
Planning Services
PO Box 230
Blueschool House
Blueschool Street
Hereford HR1 2ZB

Lisa Bullock
3rd Floor, Temple Point
Redcliffe Way
Bristol
BS1 6NL

Tel: 0117 3721120/ 07710940757
Fax: 0117 3721146
Email: lisa.bullock@networkrail.co.uk

24 June 2015

Dear Sir or Madam

Callow & Haywood Group Neighbourhood Development Plan

Thank you for consulting with Network Rail in relation to the Callow & Haywood Group Neighbourhood Development Plan.

Any development has the potential to impact on Network Rail's land, assets and operational railway infrastructure, the Callow & Haywood Plan Group and potential developers should be aware of and consider Network Rail's standard guidelines and requirements when developing sites located adjacent or in close proximity to Network Rail's land, assets and operational railway infrastructure. For this information please visit www.networkrail.co.uk/asp/1538.aspx. Please let me know if you would like more specific information on these standard guidelines and requirements.

I would be grateful if the Callow & Haywood Plan Group could consider the comments made within this letter.

Yours faithfully

A handwritten signature in blue ink, appearing to read "L Bullock".

Lisa Bullock
Town Planner



Historic England

James Latham
Technical Support Officer
Neighbourhood Planning
Strategic Planning and Conservation Teams
Herefordshire Council
Hereford
HR1 2ZB

Our ref: 1418

Your ref:

Telephone
0121 256887

29 June 2015

Dear Sirs

CALLOW AND HAYWOOD NEIGHBOURHOOD PLAN – REGULATION 16 CONSULTATION

Thank you for the invitation to comment 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 locally significant buildings and rural landscape character. We are pleased to note that several of our earlier recommendations have been incorporated in this version of the Plan.

Overall Historic England considers that the Callow and Haywood Neighbourhood Plan is a well-considered, concise and fit for purpose document that constitutes a very good example of community led planning.

I hope you find these comments helpful. If you have any queries please do not hesitate to contact me.

Yours faithfully

Pete Boland
Historic Places Adviser
E-mail: peter.boland@english-heritage.org.uk



Historic England, 8th Floor, The Axis, 10 Holliday Street, Birmingham B1 1TG
Telephone 0121 625 6870 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available.





The Coal
Authority



INVESTOR IN PEOPLE

200 Lichfield Lane
Berry Hill
Mansfield
Nottinghamshire
NG18 4RG

Tel: 01623 637 119 (Planning Enquiries)

Email: planningconsultation@coal.gov.uk

Web: www.coal.gov.uk/services/planning

For the Attention of: Mr J Latham

Herefordshire Council

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

10 June 2015

Dear Mr J Latham

Callow and Haywood Neighbourhood Development Plan

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 at this stage.

We look forward to continuing to receive your emerging planning policy related documents; preferably in electronic format. For your information, we can receive documents via our generic email address planningconsultation@coal.gov.uk, on a CD/DVD, or a simple hyperlink which is emailed to our generic email address and links to the document on your website.

Alternatively, please mark all paper consultation documents and correspondence for the attention of the Planning and Local Authority Liaison Department.

Should you require any assistance please contact a member of Planning and Local Authority Liaison at The Coal Authority on our departmental direct line (01623 637119).

Yours sincerely

Rachael A. Bust *B.Sc.(Hons), MA, M.Sc., LL.M., AMIEnvSci., MInstLM, MRTPI*
Chief Planner / Principal Manager
Planning and Local Authority Liaison

James Latham
Technical Support Officer
Neighbourhood Planning, Strategic Planning & Conservation teams
Herefordshire Council
Planning Services
Blueschool Street
Hereford
HR1 2ZB

Enquiries: Rhys Evans/ Ryan Norman
0800 917 2652

4th June 2015

Dear James,

**CALLOW AND HAYWOOD NEIGHBOURHOOD DEVELOPMENT PLAN SUBMISSION
CONSULTATION – JUNE 2015**

I refer to your letter regarding the above consultation. Dŵr Cymru Welsh Water (DCWW) appreciates the opportunity to respond and we offer the following representation:

The comments provided at the Neighbourhood Development Plan Pre-submission Consultation Stage in January 2015 still apply, therefore we have no further comments to add at this time.

We hope that the above information will assist you as you continue to progress the NDP. 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 sincerely,



Rhys Evans

Lead Forward Plans Officer

Developer Services

Latham, James

From: Turner, Andrew
Sent: 24 June 2015 12:27
To: Neighbourhood Planning Team
Subject: RE: Callow & Haywood Group Regulation 16 Neighbourhood Development Plan consultation

RE: Callow & Haywood Group Regulation 16 Neighbourhood Development Plan consultation

Dear Neighbourhood Planning Team,

My understanding is that no specific sites have been identified in this plan and as such I would advise:

- Given that no specific sites have been identified in the plan I am unable to provide comment with regard to potential contamination.

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.

Finally 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.

These comments are provided on the basis that any other developments would be subject to application through the normal planning process.

Kind regards

Andrew

Andrew Turner
Technical Officer (Air, Land and Water Protection),
Environmental Health & Trading Standards,
Economy, Communities and Corporate Directorate
Herefordshire Council, Blueschool House, PO Box 233
Hereford. HR1 2ZB.
Direct Tel: 01432 260159
email: aturner@herefordshire.gov.uk

From: Neighbourhood Planning Team
Sent: 22 May 2015 14:10
Subject: Callow & Haywood Group Regulation 16 Neighbourhood Development Plan consultation

Dear Consultee,

Callow & Haywood Parish Council have re-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/planning-and-building-control/neighbourhood-planning/draft-plans-regulation-14-and-submitted-plans-regulation-16/callow-and-haywood-group-submitted-plans>

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

The consultation runs from 22nd May 2015 until 3rd July 2015.

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

James Latham

Technical Support Officer

Neighbourhood Planning, Strategic Planning & Conservation teams

Herefordshire Council

Planning Services

PO Box 230

Blueschool House

Blueschool Street

Hereford

HR1 2ZB

Tel: 01432 383617

Courier code : H31

Email: jlatham@herefordshire.gov.uk

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

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

Web: www.herefordshire.gov.uk/neighbourhoodplanning (Neighbourhood Planning)

www.herefordshire.gov.uk/local-plan (Strategic Planning)

www.herefordshire.gov.uk/conservation (Conservation)

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Latham, James

From: Crane, Hayley
Sent: 29 May 2015 14:56
To: Neighbourhood Planning Team
Subject: Callow and Haywood Neighbourhood Plan

Hi Neighbourhood Planning Team

I've read the plan again and they still haven't changed anything from my last comments, insisting in policy CH9 on smaller development sites of 5 dwellings or less automatically wipes out any chance of affordable housing being delivered within the parish. Housing Associations cannot afford to purchase infill plots and 5 units is below the new Government threshold of 10 dwellings.

Regards

Hayley

Hayley Crane

Commissioning Officer (Housing Development) | Housing Partnerships

Adults and Wellbeing Directorate | Commissioning, Adults' Well-Being & Independent Living Service

Herefordshire Council
County Offices, Plough Lane
Hereford, HR4 0LE
Tel: 01432 261919



Mr. James Latham
Neighbourhood Planning Team
Herefordshire Council
Forward Planning
PO Box 4
Hereford
Herefordshire
HR4 0XH

Our ref: SV/2010/103979

Your ref:

Date: 02 July 2015

Dear Mr. Latham

CALLOW AND HAYWOOD REGULATION 16 CONSULTATION

I refer to your email of the 22 May 2015 in relation to the above Neighbourhood Plan (NP) consultation. We have reviewed the submitted document and would offer the following comments at this time.

As part of the recent Herefordshire Council Core Strategy submission 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.

Flood Risk: As stated in the submitted NP there are a number of watercourses within the Parish with areas of Flood Zone 3 (High risk) present in the area of Bullinghope. Whilst the NP is very detailed there is limited reference to flood risk in the document. Point 4 of Policy CH1 does reference flood attenuation but we would expect more proactive text confirming, in conformity with both the National Planning Policy Framework (NPPF), Herefordshire Councils Emerging Core Strategy (Policy SD3) and their current Unitary Development Plan (Policy DR7), adherence to a Sequential approach with all built development being located within Flood Zone 1, the low risk Zone.

Whilst conformity with the Core Strategy is vital with regards to development and flood risk there may be scope to add a locally specific flood risk policy point to address any flood risk issues the Parish has. Discussions with Herefordshire Council and their land drainage team may identify such flood risk improvements.

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

Cont/d..

Waste Water Infrastructure: As stated within the associated Environmental Report (May 2015) 'New development proposed through the Callow and Haywood NDP should be assessed against the capacity of local infrastructure'. In this instance we would expect consultation with Welsh Water to ensure that the scale of development can be accommodated over the plan period. As part of the Water Cycle Study (WCS) update/addendum, an assessment of Sewage Treatment Works within the County was undertaken with data collated by both Welsh Water and ourselves. The Plan should make reference to this information to provide re-assurance that there is adequate foul infrastructure to accommodate growth throughout the plan period.

Water Framework Directive (WFD): The EC Water Framework Directive European Union 2000 Commits all EU member states to achieve good qualitative and quantitative status of all water courses by 2027 Aims for 'good status' for all ground and surface waters (rivers, lakes, transitional waters, and coastal waters) in the EU.

The Norton Brook (Ordinary Watercourse) is currently at 'Moderate status'. In line with the above we would expect development in the Callow and Haywood area to have no detrimental impact on the watercourse and, where possible, aid in it achieving 'good status' by 2027.

To further assist you in finessing your final submission I have attached a copy of our Neighbourhood Plan Pro-Forma which contains additional information relating to the above issues and what we would expect to see in your document.

I trust the above is of assistance at this time. We would be happy to co-operate further on the areas detailed above prior to the proposed Neighbourhood Plan adoption. 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: 01743 283579
Direct e-mail: graeme.irwin@environment-agency.gov.uk

Latham, James

From: Victoria Vernon <Victoria.Vernon@sportengland.org>
Sent: 27 May 2015 11:15
To: Neighbourhood Planning Team
Subject: Callow & Haywood Group Regulation 16 Neighbourhood Development Plan consultation

Thank you for consulting Sport England on the above Neighbourhood Plan.

Planning Policy in the **National Planning Policy Framework** 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 and providing enough sports facilities of the right quality and type and in the right places is vital to achieving this aim. This means positive planning for sport, protection from unnecessary loss of sports facilities and an integrated approach to providing new housing and employment land and community facilities provision is important.

It is important therefore that the Neighbourhood Plan reflects national policy for sport as set out in the above document with particular reference to Pars 73 and 74 to ensure proposals comply with National Planning Policy. It is also important to be aware of Sport England's role in protecting playing fields and the presumption against the loss of playing fields (see link below), as set out in our national guide, '**A Sporting Future for the Playing Fields of England – Planning Policy Statement**'.

<http://www.sportengland.org/facilities-planning/planning-for-sport/development-management/planning-applications/playing-field-land/>

Sport England provides guidance on developing policy for sport and further information can be found following the link below:

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

Sport England works with Local Authorities to ensure Local Plan policy is underpinned by robust and up to date assessments and strategies for indoor and outdoor sports delivery. If local authorities have prepared a Playing Pitch Strategy or other indoor/outdoor sports strategy it will be important that the Neighbourhood Plan reflects the recommendations set out in that document and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support the delivery of those recommendations.

<http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/>

If new sports facilities are being proposed Sport England recommend you ensure such facilities 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/>

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

Regards,

Victoria Vernon

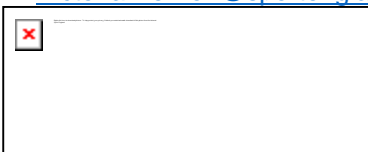
Planning Administrator

T: 020 7273 1747

M:

F: 01509 233 192

E: Victoria.Vernon@sportengland.org



Creating a sporting habit for life



Sport Park, 3 Oakwood Drive, Loughborough, Leicester, LE11 3QF

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Latham, James

From: Newey, Angela
Sent: 07 July 2015 09:20
To: Bannister, Edward
Cc: Singleton, Kevin
Subject: Callow and Hayward Neighbourhood Plan

Dear Ted,

Further to James' email I have considered the content of the Callow and Hayward Neighbourhood Plan in relation to its conformity with the emerging Core Strategy. I would like to make the following observations:

- I note that settlement boundaries haven't been identified. Modifications to the supporting text to policy RA2 require NDPs to identify these boundaries. If no SBs are identified there should be at least some other mechanism to clearly identify what constitutes the extent of settlements in the neighbourhood plan.
- I note that policy Ch9 does not refer to affordable housing although it does refer to Starter Homes. I assume that the reason being is that the Policy allows for development of groups of up to 5 houses and the modified core strategy policy only requires a contribution towards affordable housing for market housing developments of more than 10 dwellings or which have a maximum combined gross floor space of more than 1000sqm. However I recommend that the plan includes consideration of the provision of affordable housing through the rural exceptions policy (Core Strategy Policy H2).
- Although not a conformity issue Policy CH8 may benefit from minor rewording to make it clear that in all cases where a re-use is proposed that criteria 1 & 2 will need to be met to accord with Core Strategy Policy SC1.

I hope these comments are helpful. Please contact me if you would require any clarification.

Angela Newey
Senior Planning Officer
Strategic Planning
Economy, Communities and Corporate Directorate

Telephone: 01432 383637
Email: angela.newey1@herefordshire.gov.uk

Latham, James

From: Victoria Bankes Price <VictoriaBankesPrice@woodlandtrust.org.uk>
Sent: 22 May 2015 16:52
To: Neighbourhood Planning Team
Subject: Woodland Trust Comments on Callow & Haywood Neighbourhood Plan

Sir/Madam

Many thanks for consulting the Woodland Trust on the Callow & Haywood Neighbourhood Plan. The Trust is very supportive of the principle of neighbourhood planning as a means for enabling communities to better protect their woods and trees as well as an opportunity to promote tree planting.

We are however very concerned about the following statement in Policy CH1, Paragraph 9:

DEVELOPMENT WHICH INVOLVES THE REMOVAL OF EXISTING LOCAL ORCHARDS OR WOODLAND WILL BE RESISTED UNLESS DEVELOPERS CAN DEMONSTRATE THAT THEY ARE NO LONGER VIABLE.

The term viable is inappropriate to use in relation to orchards and woodlands as even if it is no longer financially viable they will be viable in terms of its contribution to biodiversity and amenity as well as the wider landscape. As it stands this paragraph currently offers less protection than that set out in paragraph 118 of the National Planning Policy Framework.

We would ask that the term 'THAT THEY ARE NO LONGER VIABLE' should be replaced with 'an exceptional local need for development in that location'.

If I can be of any further assistance please do not hesitate to get in touch, best of luck with your plan going forward.

Kind regards

Victoria

Victoria Bankes Price

Planning Advisor
t: 0845 293 5767
m: 07766133182
e: victoriabankesprice@woodlandtrust.org.uk
@VBP2011
w: www.woodlandtrust.org.uk



The Woodland Trust
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