

First Regulation 14 Consultation - 6 Feb 2017 - 20 March 2017

Table 2 Consultation Bodies and Other Organisations Comments

Respondent Identification Number	Section/ Policy Number	Support/ Object/ Comment/	Representation	Parish Council Consideration	Changes to NDP
S.1 Environment Agency.	All / Site allocations	Comment	<p>Herefordshire Council Core Strategy updates to both the Strategic Flood Risk Assessment (SFRA) and Water Cycle Strategy (WCS) 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.</p> <p>In the absence of specific sites allocated within areas of fluvial flooding, does not offer a bespoke comment at this time. We note the submitted Pro-Forma and welcome Policy's SUS1 (Sustainable Development) and ENV3 (Flooding) which seeks to ensure that all future development within the Parish is located outside of areas of high flood risk where possible and also considers infrastructure capacity. 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, as the Lead Local Flood Authority (LLFA).</p>	<p>Noted.</p> <p>The NDP Review includes a technical site assessment process which should consider flood risk associated with submitted sites.</p> <p>The NDP Policies will be amended following consideration of comments submitted by Herefordshire Council - see Table 1.</p>	No change.
S.2 Herefordshire Campaign for Protection of Rural England	All ENV1 ENV2 EMP2 EMP3	Comment	Llangarron's draft plan addresses many of the issues CPRE identify as being relevant to NPs. and should provide strong foundations for local people wishing to guide the Parishes' future, it is clearly the result of many hours work and demonstrates both great knowledge of, and commitment to your parish. We do not have your detailed knowledge of the area, nor do we feel it would be right to question local choices about the content of the Plan Our suggestions below therefore reflect HCPRE's concern for the rural landscape as a whole.	<p>Noted.</p> <p>Cross check policy wording with comments as part of NDP review.</p>	<p>Amend NDP.</p> <p>Cross check policy wording of ENV1, ENV2, EMP2, and EMP3 as part of NDP Review to ensure various aspects as suggested are considered and if appropriate addressed.</p>

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			<p>1. Policies ENV1 and 2</p> <p>a) Identifying landscape and heritage assets. Appendix 2 usefully identifies important hedgerows and green frontages. Maps/lists identifying locally valued views, landmarks, heritage assets, important woodlands, green spaces, footpaths and sensitive skylines would also be a valuable future resource/evidence-base and a good way to add these assets to the official record. Locally valued but unlisted heritage (for example signposts, boundary stones, decorative features on barns, ancient paths and boundary ditches or banks, unlisted farmsteads and buildings) can also be mapped.</p> <p>b) Protecting landscape - In addition to assets you have identified under various policies (skylines, topography, hedges) development proposals can be asked to:</p> <ul style="list-style-type: none"> - protect veteran, mature and established trees. - retain existing orchards unless it can be demonstrated that their loss will not reduce environmental biodiversity or be detrimental by causing loss of wildlife habitat. Where orchards are lost developers can be expected to include an equivalent range of varietal fruit species traditional to the local area in landscaping schemes of at least equivalent size to that which will be lost - take account of known surface and sub-surface archaeology, and ensure unknown and potentially significant deposits are identified and appropriately considered during development. Lack of current evidence of sub-surface archaeology is not proof of absence. <p>2. Policies EMP 2 and 3 - Large scale economic activities</p> <p>Large scale economic activities such as industrial farming development (intensive poultry/cattle rearing units and large scale polytunnels) can be detrimental to the environment and landscape if poorly located and can</p>		

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			adversely affect environmental amenity for residents, businesses and tourists. In Policy ENG 1 you outline the impact renewable energy schemes could have on your sensitive local landscape, perhaps a similar argument could be applied to policies EMP 2 and 3.		
S.3 Dwr Cymru Welsh Water	Aims Objectives Policies	Support / Comment	<p>Support the aims, objectives and policies set out.</p> <p>Note that there is no specific reference to the capabilities of the public sewerage system or wastewater treatment works (WwTW) to accept the foul flows from the amount of new development proposed.</p> <p>Consequently, consider the following policy (in line with Policy SD4 of the Herefordshire Council Core Strategy) would provide the assurance that new development will only be permitted where the capacity of the public sewerage network and/or WwTW allows:</p> <p>New Policy: Public sewerage network and wastewater treatment works (WwTW)</p> <p><u>'Development that may result in the capacity of the public sewerage network and/or the wastewater treatment works (WwTW) serving Llangrove, Llangarron or Llancloudy becoming overloaded will not be permitted. In either of these instances, development will need to be phased or delayed until capacity becomes available, either through Welsh Water regulatory investment or, in advance of this through the developer funding the improvements themselves via the provisions of the Water Industry Act (1991) and/or section 106 of the Town and Country Planning Act (1990).'</u></p> <p>With regard to the housing growth proposed over the Neighbourhood Plan period, we can confirm the following: <u>Llangrove</u></p> <ul style="list-style-type: none"> • Site 1 – 15 dwellings 	<p>Accepted.</p> <p>Insert new policy as suggested.</p> <p>Site allocations will be reconsidered as part of the NDP Review.</p>	<p>Amend NDP.</p> <p>Insert new Policy:</p> <p>Policy ENV?: Public sewerage network and wastewater treatment works (WwTW)</p> <p>'Development that may result in the capacity of the public sewerage network and/or the wastewater treatment works (WwTW) serving Llangrove, Llangarron or Llancloudy becoming overloaded will not be permitted. In either of these instances, development will need to be phased or delayed until capacity becomes available, either through Welsh Water regulatory investment or, in advance of this through the developer funding the improvements themselves via the provisions of the Water Industry Act (1991) and/or section 106 of the Town and Country Planning Act (1990).'</p> <p>Note and insert detailed information in relation to WwT for individual settlements in revised NDP.</p>

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			<p>There are no issues in providing a supply of water to this site, though some level of off-site mains may be required.</p> <p>There are no issues with the public sewerage network accommodating the foul-only flows from the site, though some level of off-site sewers may be required.</p> <p>Llangrove is served by our Goodrich Wastewater Treatment Works (WwTW) for which there are no issues in accommodating the level of growth proposed.</p> <ul style="list-style-type: none"> • Site 2 – 10 dwellings <p>There are no issues in providing a supply of water to this site, though some level of off-site mains may be required.</p> <p>There are no issues with the public sewerage network accommodating the foul-only flows from the site. The site is traversed by two 6" foul public sewers for which protection measures will be required on the form of easement widths or diversion.</p> <p>Llangrove is served by our Goodrich Wastewater Treatment Works (WwTW) for which there are no issues in accommodating the level of growth proposed.</p> <p><u>Llangarron</u></p> <ul style="list-style-type: none"> • Land adj. Farr Cottages – 5 dwellings <p>There are no issues in providing a supply of water to the site, though some level of off-site mains may be required.</p> <p>There is no public sewerage within close proximity of this site. As such, it is likely that alternative foul drainage methods will be required in line with Policy SD 4 of the Herefordshire Core Strategy. The Environment Agency (EA) can provide more information on this.</p> <ul style="list-style-type: none"> • Unidentified sites – 9 dwellings <p>There are no issues in providing a supply of water to the number of dwellings proposed, though dependant on location some level of off-site mains may be required.</p> <p>The Herbert's Hill and Garron View areas of Llangarron are each served by a small (in area) public sewerage network</p>		

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			<p>and WwTW. If the 9 dwellings on unidentified sites are located in proximity to these facilities there will be no issues in accommodating, though off-site sewers may be required. Otherwise, alternative foul drainage methods will be required in line with Policy SD 4 of the Herefordshire Core Strategy. The EA can provide more information on this.</p> <p><u>Llancloudy</u></p> <ul style="list-style-type: none"> • Unidentified site – 3 dwellings <p>There are no issues in providing a supply of water to the proposed dwellings, though dependant on location some level of off-site sewers may be required.</p> <p>The public sewerage network in Llancloudy is very small in terms of area served. If the 3 dwellings on unidentified sites are located in proximity to the public sewerage network and WwTW there will be no issues in accommodating though off site-sewers may be required. Otherwise, alternative foul drainage methods will be required in line with Policy SD 4 of the Herefordshire Core Strategy. The EA can provide more information on this.</p> <p><u>Three Ashes</u></p> <ul style="list-style-type: none"> • Unidentified site – 3 dwellings <p>There are no issues in providing a supply of water to the proposed dwellings, though dependant on location some level of off-site sewers may be required.</p> <p>There are no public sewers or WwTW in Three Crosses, therefore the provisions of Policy SD 4 of the Herefordshire Core Strategy will need to be adhered to. The EA can provide more information on this.</p>		
S.4 Llangrove Village Hall Grants Committee		Comment	<p>I hoped that mention of The Village Hall, and its prime function within Llangrove, might have a more pertinent mention in the Report.</p> <p>The development and regeneration of Llangrove Village Hall is proposed to create a new, vibrant community space and</p>	Accepted. Include text in revised NDP and update as required.	Amend NDP. Include text in revised NDP (supporting text) and update as required.

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			<p>asset, which meets the needs of all Llangrove Residents particularly those most impacted by rural isolation - being the young and the older populace. It will provide a warm, safe, modern, and flexible community venue for individuals and groups of all shapes and sizes, and will become both the beating heart of Llangrove and an asset to be used and enjoyed as well, by the neighbouring villages and communities. The Big Lottery Reaching Communities – Building Strand, is being approached for Funding to cover “Capital cost of Building work and fees”. The amount is yet to be decided.</p> <p>To complement the Grant, an amount of Self-Funding, from the Village Hall Reserve, will be made available, according to the need ruling at the time. Consultation is on-going with representatives of the “USERS” of the Village Hall, who have recently viewed detailed plans of potential improvements, and are contributing with various ideas as to each group specific needs for consideration. The Project aims to support lasting and sustainable changes to places and spaces, involving essential Alteration, Refurbishment and Extension, e.g. Revised floor plan accommodating better Disabled Access - Heat Conservation (carbon footprint) - Additional Storage – Cladding and appropriate insulation of the outside walls – Upgraded insulation and Renewal of Roofing. Construction will be in three phases, aiming to avoid any unwarranted cessation of facilities. Whilst the current ‘Feet over the doorstep’ is reportedly in excess of 4000 per annum, a Refurbished Village Hall will provide a more amenable, warmer, modernised Community arena. A wide range of activities is necessary, to create increased Community Spirit for both younger and older residents, who are disadvantaged and excluded, due to our rural location, which is somewhat isolated, and with limited facilities. It will also cater for the significant current and planned Llangrove domestic building programme, with its planned increase in</p>	<p>Refer to HC comments about more local detail required.</p>	

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			population. The Indices of Deprivation, (applying to Llangrove), provides us with the required Eligibility to Apply for The Big Lottery Grant Funding. Some examples of Deprivation, affecting both Children and Older people are, No shop – No Post Office – Only one bus per week to Ross-on-Wye, Monmouth and Hereford (currently under threat). Upon completion of the Project, (anticipated to be in the region of 2 years from the inception of the Grant benefit), we will be required to evidence the fulfilling of needs in combating various elements of deprivation involved. The Village Hall will continue to be fundamental to the social life of this Village.		
S.5 Historic England	All	Comment / Support	Supports both the content of the document and the vision and objectives set out in it. The emphasis on the conservation of local distinctiveness and the protection of rural character is highly commendable. Overall the plan reads as a well-considered, very concise and fit for purpose document which we consider takes a suitably proportionate approach to the historic environment of the Parish.	Noted.	No change.
S.6 Natural England	All Additional policies required.	Comment	1. Llangarron Neighbourhood Plan Area is in the catchment of the River Wye. The River Wye is designated as the River Wye Special Area of Conservation (SAC). This means that it is afforded protection under the EC's Conservation of Habitats and Species Regulations 2010, as amended (the 'Habitats Regulations'). The rivers are also notified at a national level as Sites of Special Scientific Interest (SSSI). The River Wye SAC has a series of water quality targets associated with its good condition. The targets for phosphates are being exceeded on some stretches of the river, while on other stretches future development has the potential to result in failures. In order to ensure the river achieves its targets, a Nutrient Management Plan (NMP) has been produced.	Accepted. Herefordshire Council are undertaking all SEA / HRA related work on behalf of the PC. Additional policy wording should be included in the revised NDP as advised. Agricultural land classifications will be considered as part of the site assessment process.	Amend NDP. Insert additional policy wording as suggested: Insert new policy ENV? <u>"New development not connected to mains sewerage, and using septic tanks and packaged treatment plants, should include measures such as soak away or reed bed systems, where conditions</u>

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			<p>This NMP has been used to inform the adopted Herefordshire Core Strategy. Please see Core Strategy Policy SD4: Waste water treatment and river water quality and its supporting text for further information. Where a neighbourhood plan could potentially affect a European protected site, it will be necessary to screen the plan in relation to the Conservation of Habitats and Species Regulations (2010), as amended (the 'Habitats Regulations'). One of the basic conditions that will be tested at Examination is whether the making of the plan is compatible with European obligations and this includes requirements relating to the Habitats Directive, which is transposed into the Habitats Regulations. Neighbourhood Plans that are in line with the adopted Core Strategy will not have adverse effects on the River Wye SAC, and further assessment under the Habitats Regulations is not required. This includes Neighbourhood Plans that allocate sites, provided that overall levels of growth are in line with levels set in the Core Strategy.</p> <p>However, Neighbourhood Plans which allocate growth over and above the Core Strategy will need to undertake a Habitat Regulations Assessment, in order to determine whether there are likely significant effects. Herefordshire Council is the Competent Authority for undertaking this assessment, and Natural England has an advisory role. If this Neighbourhood Plan falls into this category, then we ask that the Neighbourhood Planning Group and/or Local Authority let us know at their earliest convenience. This will help us to ensure we prioritise our input. In accordance with Schedule 2 of The Neighbourhood Planning (General) Regulations 2012, a neighbourhood plan cannot be made if the likelihood of significant effects on any European Site, either alone (or in combination with other plans and projects) cannot be ruled out. Therefore, measures may need to be incorporated into the neighbourhood plan to</p>		<p><u>allow, to reduce environmental impacts of effluent. "</u></p> <p>Insert into ENV1 or similar:</p> <p><u>"Development proposals should demonstrate how they have addressed the preservation, and restoration, of existing green infrastructure, for example, trees, hedges, woodland and promoted the creation of habitat as a resource for the community, for example, traditional orchards."</u></p>

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			<p>ensure that any likely significant effects are avoided in order to secure compliance with the Regulations. A screening exercise should be undertaken if there is any doubt about the possible effects of the plan on European protected sites. This will be particularly important if a neighbourhood plan is to progress before a local plan has been adopted and/or the neighbourhood plan proposes development which has not been assessed and/or included in the Habitats Regulations Assessment for the local plan.</p> <p>2. Natural England suggest that a policy requirement for new development not connected to mains sewerage, and using septic tanks and packaged treatment plants, to include measures such as soakaway or reed bed system, where conditions allow, to reduce environmental impacts of effluent.</p> <p>3. It is also suggested that a specific policy commitment to the preservation, and restoration, of existing green infrastructure, for example, trees, hedges, woodland and the creation of habitat as a resource for the community, for example, traditional orchards.</p> <p>4. NE has not checked the Agricultural Land Classification of the proposed allocations, but we advise you ensure that any allocations on best and most versatile land are justified in line with para 112 of the National Planning Policy Framework.</p>		