

Breinton Parish Council

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FINAL SUBMITTED VERSION

Dear Sirs,

Breinton Parish Council (referred to as 'We', 'Our' or the Parish Council throughout the rest of this document) welcomes the opportunity to comment on the Hereford Area Plan (HAP) Housing and Employment Site Options. We will focus on the sites – both housing and employment - that may impact upon Breinton parish and its residents, primarily those adjacent to the parish boundary in the Belmont Rural, Greyfriars, Kings Acre and Whitecross wards of Hereford city.

1. General points

Before we start on the site specific detail there are a number of general points to make.

1. We note that the consultation document says that the green shaded sites have housing potential but that there may still be 'is SUEs' to resolve. We would have thought that 'is SUEs' relating to the green shaded sites would be explored in some detail, if not finally resolved, before the HAP is approved, given the lengthy delays experienced in bringing the 3 Elms Strategic Urban Expansion (SUE) to the Planning Committee because basic 'is SUEs' were not resolved prior to it being included in the Core Strategy. If the 'is SUEs' are not clear and a probable solution identified then the HAP is not a sensible vehicle to deliver the Core Strategy housing numbers on time. In particular
 - a. Flood risk assessments (your 3.2) should be completed before decisions are made on sites or combinations of sites. Neither is it sufficient for these to simply identify 'is SUEs'; if a site is to be considered as truly deliverable the assessment should identify what needs to be done. The same applies to the detailed flood modelling (your 5.14) which should include overland flows as well as floods from rivers, streams and culverts
 - b. The further work to model possible traffic impacts of the potential site options is essential particularly to identify the cumulative impacts of sites in the NW quadrant of Hereford (your 3.6 and 5.2) before they are included in the HAP
 - c. Mitigation measures for any highways impacts for these sites, or groups of sites should be ascertained before they are included in the HAP (your 4.4)
2. We are concerned that there may be moves to reduce the commitment to the Urban Village meaning that other housing sites may be required. We note that at April 2017, after commitments and completions were allowed a further 448 units needed to be committed/delivered in order to reach the 800 Core Strategy number. Your consultation

paper says that there is a possibility of approvals for other uses. The table in Appendix 3 of the consultation document says that the Cen21 sites have an assessed capacity of only 300 but Cen21 is the only central site assessed at the mid- point density of 50 units per hectare(dph.) rather than the upper 70dph. Even 70dph only produces 400 units – still well below the 448 needed. Finally the site summary itself for Cen21 says ‘these sites together have capacity to accommodate some but not all of the 800 dwellings and estimates of housing capacity are an approximation’. Even the wording differences between Core Strategy Policies H1 (800) and H2 (around 800 new homes, the majority within a new urban village) cannot totally remove this discrepancy. What happens if a SUE fails to deliver the numbers required?

3. The site option summaries are in our view inconsistent, unclear, lack precision, are potentially misleading and are in some cases incorrect. We will make these points clear site by site. We also expect that when different forms of words are used to explain the same SUEs’ throughout the documents that these reflect actual differences between the sites being assessed rather than different authors, poor editing etc. Unless consistent wording is applied the strengths/weaknesses of individual sites cannot be accurately compared. There is a lack of editorial/quality control by the authors indicative of documents whose publication has been unduly rushed. The technical summaries are also difficult to interpret in some cases, especially the tables, without knowing the guidance for what should go in each box. For instance what does an entry under ‘surface water’ in the environmental designation section mean? Additional explanatory notes for Appendix 1 of the consultation document that gives the template for the technical summary could be useful in future consultations.
4. There is a casual disregard for the quality of the agricultural land under consideration and whose productivity may be lost to future generations if all of the proposal are accepted. While such losses are dismissed as inevitable by the consultation document we do not believe they are necessary and our comment above on the potential reduction in housing in the urban village is relevant here since this may increase pressure to find replacement capacity/other additional sites. We note that para 170a of the 2018 NPPF says that ‘planning policies.....should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes.....and soilsin a manner commensurate with their statutory status’ while para 170b specifically refers to the best and most versatile soils which all the sites we include in our comments are, part from Bel08.
5. The consultation document says that mitigation measures for the highways impacts have yet to be ascertained. This is unacceptable given the scale of potential housing and industrial for growth to the north and west of Hereford. We will turn time and time again in the individual site specific comments that follow in the rest of this document to SUEs’ such as the need to minimise the number of additional road junctions on Kings Acre Road. There is also an absolute imperative for a strategic transport assessment covering the whole north-west quadrant of Hereford to assess the traffic implications from all these sites on the routes in and out of the city. A whole corridor approach is needed to cover all the impacts and not just those of the potential bypass.
6. We believe that the impact of developing the sites we highlight below will have much wider implications for the city and county as a whole and do not feel that they should be developed individually, in isolation or in a piecemeal fashion. Their relationship to each other, interfaces with the surrounding wards, the lack of non-car links to other parts of the

city (especially the centre, hospital and railway station) and impact on approximately 25% of the existing population of the city as a whole all need careful consideration, explanation and consultation. The two SUE's locally are expected to provide a minimum of 1700 new homes by 2031. The seven sites we address below have a minimum assessed capacity of 1590 additional homes between them and a maximum of over 2750. Thus the north-west quadrant of the city could, conceivably be expected to accommodate 4450 (68%) of the total of 6500 homes expected by 2031. It is not adequate to say that the proposed western bypass will address these is SUEs'. What is needed is a master plan for the whole northwest section of the Hereford and its surrounding parishes before these sites are considered for development.

7. The 6500 homes for the city (part of the 16500 for the county) were already inflated from the Objectively Assessed Need of 14200 for Herefordshire at the time of the Core Strategy's adoption in 2015. With the Core Strategy due for revision in 2019, the recent changes to the NPPF/NPPG and the current vacuum from central government on updating ONS figures; the local housing need numbers are more likely to be reduced than increased in future so final site identification should err on the cautious side. We note that paragraph 31 of the 2018 NPPF says that 'preparation and review of all policies should be underpinned by relevant and up-to-date evidence'. This is most certainly no longer the case with the Core Strategy or with the proposed Hereford Area Plan.
8. We believe that there is a significant issue about the deliverability of all of these sites by 2031 especially if they are all programmed for the last year of the HAP time frame. Exploring the 'is SUEs' to resolve' referred to earlier may render them unsuitable or unavailable but achievability is another thing. It is not simply a judgement about economic viability as para 4.9 of your consultation document says (although so many new houses potentially on the market in the NW sector of Hereford at the same time may not be commercially attractive) but also one of practicality and the lack of time left before 2031 once the SUEs' positions are resolved and 'caps' removed (or not) by infrastructure being delivered on time. We do not understand the various references within the site summaries to 'caps' on housing numbers and this lack of clarity is explained in Cre25/7 below.
9. It is not sensible to ignore the potential contribution sites identified in the NE quadrant of Hereford city because no route alignment work has been carried out on this section of the proposed Hereford bypass. This is wrong and inconsistent with the approach taken at 3 Elms. Here work proceeded, including public consultations, when only the route corridor was known from the Core Strategy and there was presumably no knowledge of the route options or that the red route might eventually be favoured. To ignore these sites at this stage means that there is a bias of development over the next decade towards sites in the other three quadrants principally the NW.

2. Site specific comments – Kings Acre Road

In addition to the city wide implications alluded to above; there are seven sites that would have an impact on either the King's Acre Road or the Adams Hill parts of Breinton Parish were they to be adopted in the HAP and eventually developed. Our comments are based primarily on the site and technical summaries. The volume of paperwork has not allowed us to consider the various environmental appraisals in any detail but we may comment on these in future.

CRE 25 – Wyevale nurseries

1. The use of this site for housing would inevitably mean the loss of permanent employment opportunities
2. We note that unlike most of the sites considered below (where the existence of mineral reserves is dismissed) the British Geological Survey confirms that there are mineral reserves here but the technical and site summaries say that 'due to its location close to Hereford extraction would not be sought here' We are aware that Stretton Sugwas quarry was closed some years ago on environmental grounds. Minimising the distance aggregates are carried should be a consideration for the HAP and given the amount of potential development in the NW area – indeed in Hereford as a whole over the next 13 years - we are surprised that there is no indication anywhere in the consultation documents of where aggregates will be sourced and the distances to be travelled. This is particularly important as a replacement minerals and waste local plan is still awaited. At the time the Core Strategy was approved undertakings were given that this would be available for examination in 2016.
3. We note that the site is Grade 2 agricultural land 'very good quality'. Our comment at 1.4 is particularly relevant here especially given the 2018 revision to the NPPF
4. It is unclear what is meant by the statement that 'the remaining land is generally open countryside' or that it increases the accuracy of site comparisons. Actually the vast majority of the site is open; as the summary says 'mainly used as a growing area'.
5. There are apparently no significant landscape constraints to development yet the retaining the existing perimeter vegetation is considered key for this site. These two points are inconsistent. A consistent approach to screening is required to all sites in the area which is largely flat but highly visible from vantage points such Credenhill. The landscape effects would be particularly noticeable given the potential scale of development if the adjacent sites Thr19 and Thr35 (which could proceed independently) were to be merged with this one. The adopted Breinton NDP policy B16 identifies a number of important views for protection including the landscape currently to be observed from Breinton Ridge. These would all be adversely affected by development of sites such as these as would a number of views from other locations. Para 170a of the 2018 NPPF talks about protecting and enhancing valued landscapes.....in a manner commensurate with their statutory status . These views are from a number of the designated local green spaces in north Breinton as described in policy B9 on the NDP.
Contrary to the site summary, this site certainly should not come forward in isolation.
6. There is mention of potential improvements to the current junction between the A480 and A438. This is something that the Parish Council has campaigned for repeatedly and is on our S106 'wish list'. To date our concerns have been dismissed. However rather than following the site summary's observations; we feel that a totally new roundabout junction slightly to the west of Kings Acre Halt would be infinitely better given visibility, current speed limits and bends on the existing roads. Fundamental improvement would be essential if other sites in the area e.g. Thr35 were also to be considered for development. Access via Thr19 or by modifications to the existing business park access onto the A480 are not acceptable

7. The meaning of the 'proposed' cap on housing numbers on the SUEs' (until such time as the river crossing section of the proposed relief road is in place) is unclear as is the actual impact of preference being given to the strategic sites on other sites under consideration.
 - a. First surely the cap is enforceable? It is part of MM018 of the Public Inquiry into the Core Strategy and is contained in Appendix 5 to the adopted Core Strategy documents that sets out the relationship of infrastructure development and the SUEs'
 - b. Secondly as we understand it there are a number of 'caps'. First there is a limit of 2400 new homes in Hereford to 2020 unless the NMP succeeds in reducing phosphate levels in the Wye catchment which the various summaries ignore. This cap rises to 3250 by 2022 assuming that both the Southern Link Road and the river crossing mentioned above are completed. The cap rises still further by 2025 if improvements are made to water treatment and supply capacity and by 2027 if the rest of the proposed bypass to the A49 is completed. There are individual caps to each SUE presumably within the Hereford wide cap.
 - c. The two that are most relevant to Breinton are 3 Elms (580/1000 by 2022) and Holmer West (300/500 by 2022). Are the site summaries really saying that none of the green shaded sites being considered for inclusion in the HAP cannot be developed until the strategic sites reach their caps? There appears to us to be more than sufficient headroom within the Hereford wide cap for all four SUEs' to reach their individual cap, for there to be background growth and some of the sites under consideration to come forward. It does not appear possible to prevent this. If they are prevented then the homes apparently required will simply not be provided within the desired timescales despite sites being potentially available.
8. What is meant by the phrase 'the scope and developments to be considered will need to be confirmed'? (NB this comment also applies to Thr19 and possibly other sites)
9. We agree that a transport assessment is required but, as we say in our general opening comments this should not be confined just to this site but to the whole north-western segment of the city and the routes in and out of the city it contains. To say that the Hereford Transport Package (HTP) may provide additional network capacity once completed completely misses the point. The HTP proposes a bypass not additional capacity of use to NW Hereford residents trying to get to local services
10. Contrary to the site summary, there is no 'urban form' to this area of the city. The Parish Council objects most strongly to this assertion. Even if the site were developed eventually it would be an outer suburb of Hereford i.e. suburban. The comment about urban form is even more difficult to understand since the site description includes the phrases 'mainly a growing area...open countryside to the east... remaining land is generally open countryside' that contradict the idea of an urban form. We need to plan the fringes of Hereford city and its relationship with the surrounding countryside very carefully and the indiscriminate use of terms like urban does not inspire confidence that this is currently the case particularly as the word urban is not used in connection with other, adjacent sites. Our general comments about the need for a masterplan for the north-west segment of the city apply here
11. The public transport comments in the technical summary make it very clear that this site is not sustainable development with poor access currently by anything other than by car. This

uncomfortable fact is not included in the site summary. This site will require significant investment in active travel infrastructure for it to be sustainable

Thr19 – Land opposite Conifer Walk

1. This site is described as open countryside as should the site above (see Cre25/4 and Cre 25/10)
2. Reference is made to ‘ribbon development’ along the roadside to the south of the site. This is actually on the opposite side of the Kings Acre Road to the site and is a form of development that the adopted Breinton Neighbourhood Development Plan which covers the area seeks to minimise in future. (Policy B2). Any development of this site in the future should not add more of this undesirable suburban feature to what already exists in the area
3. This site is also Grade 2 agricultural land (of very good quality like Cre25 and other sites) but, inconsistently there is no mention of mineral reserves even to dismiss their existence/use
4. From a landscape perspective this site is considered unacceptable if it was to be developed on its own and very strong reasons are given in the technical summary – ‘no logic to development on this site.....no possible mitigation for the harm caused.....extensive boundary planting would be required to assist in screening’

The Parish Council would point out that even with screening this site – and many others under consideration to the west of Hereford – would be hugely visible from the surrounding higher vantage points including Credenhill and the former drove road along the Breinton ridge. The adopted Breinton NDP policy B16 identifies a number of important views for protection including the landscape currently to be observed from Breinton Ridge. These would all be adversely affected by development of sites such as these as would a number of views from other locations. See also Cre25/5

Large scale development here on top of what is already proposed for the Three Elms strategic urban extension (SUE) would have a cumulative and significant impact on the current landscape whatever local screening was involved. Destroyed would be more accurate. However; without any documented support the technical summary’s conclusions (which are carried forward as the site summary) speculates that the natural environment will be altered by the nearby SUE and planned western bypass and suggests that this site should be considered in that context. It is not inevitable that the natural environment is altered and a supposedly balanced assessment should not fly hypothetical kites.

5. There is mention of the ‘nearby strategic site’ which is either irrelevant or should be made in relation to Cre25 as well as other sites along Kings Acre Road
6. A full assessment and field evaluation of the potential for significant archaeology is considered essential by the Parish Council – see also Thr21/6
7. There is reference to the (road) junction format dictating if third party land is required. The meaning of this is unclear particularly as the site could be self-contained. The summary goes onto say that ‘junction spacing may potentially be an issue’. It certainly will be given the number of potential housing sites under consideration to the west of Hereford for inclusion in the HAP. The parish council objected most strongly to an excessive number of junctions along the Kings Acre Road in its representations on the proposed 3 Elms development (Ref P162820/F). At that stage only one of the sites being considered here for inclusion in the HAP, the proposed western bypass and the 3 Elms SUE were being considered. Now many more sites are possible locally along King’s Acre Road. If development proceeds on any of

these only the minimum number of junctions should be allowed. Each additional junction will disrupt traffic flow still further, increase risks to pedestrians and cyclists as well as the danger of additional accidents. Estate access points should be combined. There are only two major junctions on the Belmont Road between Asda and Tesco and their impact on disrupting traffic flows is plain to see. This kind of disruption should not be increased along Kings Acre Road by planning each site in isolation.

8. Our opening general comments on the need for a strategic transport assessment (also in Cre25/9) and on the relevance of a cap on site by site housing development (Cre25/7) are also relevant to this site
9. Our question in Cre25/8 also applies to this site
10. There are areas of medium to high flood risk on this site identified by the Environment Agencies (EA) maps of overland flows. They are ignored in the various summaries and will need to be managed carefully if the site is ever developed especially to avoid increasing flood risk down-stream at the 3 Elms SUE and further into the city centre. The flood risk assessments apparently commissioned by Herefordshire Council/EA should confirm these risks and should be reach conclusions on any necessary investment before this site is carried forward into the HAP

Thr 21 – Land west of Huntington Lane

1. Our comments on minimising the number site accesses/road junctions (Thr19/7) are relevant here and are not repeated. Additionally however separate access to this site and the adjacent Thr22 would have particularly detrimental impacts on the avenue of lime trees along the A438. While a tree lined road is at least mentioned in the site summary it singularly underplays their local and city wide significance. It fails to mention that these trees are worthy individually of protection orders and collectively form a very distinctive and unique feature of the Hereford city street-scene. The cohesive avenue of trees is already under threat from both the proposed 3 Elms access road and the preferred red route for the proposed western bypass. If these were to proceed they would together remove at least ten of the sixty plus trees in the avenue, effectively destroying a significant landscape feature to the west of Hereford. Thr21 and Thr22 must not be allowed to do even more damage. The Parish Council agrees with the site summary that access can only be via 3 Elms.
2. This site is correctly described as open countryside (unlike Cre25)
3. As a large part of the SUE at 3 Elms lies west as well as east and north of this site, shouldn't the site summary also say east of the SUE at 3 Elms and not just west?
4. Like Cre25 and Thr19, this site is also Grade 2 agricultural land but the summary does not say that this is very good quality which should be mentioned in every case. This is inconsistent
5. The summary refers to the impact on the Huntington conservation area to the north. This is largely irrelevant. This site is completely bounded by trees – which are not mentioned apart from those at the main road side – and an ancient hedgerow already providing more than adequate screening, In addition any impact on the conservation areas would be minor compared to that of the 3 Elms SUE which completely surrounds it. The 3 Elms mitigation measures should include any additional impacts of this site if any additional ones exist We agree with the landscape comments that 'development in its current state would be wholly incongruous and harmful to Huntington Lane through the loss of vegetation to facilitate. It makes no sense currently '

6. Breinton Parish Council agrees that archaeology on this site and Thr19 could be important but considers that this should be assessed and investigated prior to the granting of any planning permissions. It is not something to be mitigated for in retrospective once approval has been granted
7. This site is acknowledged as being in the source protection zone (SPZ). In fact it covers part of the innermost (red, 1) zone and the outer (green, 2) zone. Any study of this, and any subsequent work required to prevent harm from the development on this site, should be included in the studies already underway to assess the impact of the 3 Elms SUE on the SPZ in order that all sites are considered at once and sufficient capacity and assurance is provided to eliminate any/all adverse effects. This is another example of how sites along King's Acre Road should be considered together and not individually, potentially as part of a masterplan for the north-west of Hereford as we suggest in our opening, general comments.
8. Our comments on the cap on housing numbers (Cre25/7) apply equally to this site. It is unclear how it might operate. Our view is homes on sites such as this one may not be deliverable in sufficient quantity by 2031 if the cap were applied, even if the infrastructure deemed necessary is provided on schedule which currently seems unlikely
9. There is nothing about a transport assessment being required for this site unlike Cre25 and Thr19 previously. This is inconsistent. Is the impact of this site being considered as part of the 3 Elms studies? If not its relatively small additional impact should be included in these studies or one that examines all of the approaches to the north western segment of the city (See our opening, general comments)
10. Unlike the site summaries for Cre25 and Thr19, the words here go on to say that once the bypass route is known The red route has now been chosen, its alignment is known and is causing considerable disquiet locally especially for those whose homes and/or businesses will be destroyed. This wording is unnecessarily inconsistent between sites

Thr 22 – Land east of Huntington Lane

1. Our point about conserving what remains of the avenue of lime trees along Kings Acre Road (Thr21/1) is equally relevant to this site. Access to this site could be via 3 Elms and from there either to the Kings Acre, Roman or 3 Elms Roads
2. Soils – our point under Thr21/4 is also relevant to this site
3. Open countryside – our point under Thr21/2 is also relevant to this site. However to say that there will be no loss of open space (should it be developed) is disingenuous. It is already open space and is currently used informally by local dog walkers etc.
4. The Parish Council agrees that the removal of the historic hedge along Huntington Lane would be harmful to the character of the lane and should be prevented by conditions applied to any permission for this site. This is important given various concerns about wider landscape impacts of potentially developing so many sites bordering Kings Acre Road
5. SPZ – our point under Thr21/7 is also relevant to this site but the wording used in the summary is much more detailed. Why? Both sites include areas within the red and green zones although this site has potentially more of the red (innermost) zone
6. See also Thr21/10 which is equally relevant to this site
7. Archaeology - See our comments under Thr21/6 which are also relevant to this site
8. Huntington conservation area – See our comments under Thr21/5 which are also relevant to this site

9. The Parish Council agrees that this site requires a transport assessment along with all the other potential sites along Kings Acre Road as part of a comprehensive approach to this radial road corridor. Our opening, general comments make this point.
10. There is no mention of a cap or pause in developing this site while infrastructure is provided that might resolve transport issues on the network locally. (see Thr21/8) – Why is this site not being treated in the same manner as others under consideration? This is inconsistent. This is a landlocked site as the access comments make clear and access would be required via another increasing their impact on the transport network.

Thr26a – Land at Huntington

1. The site summary mentions the 3 Elms SUE to the east and north and accepts that any development here will change the natural environment. In this connection what does 'revisit to assess the landscape implications' mean? Shouldn't the landscape implications be assessed before either site is considered as a possible housing site? We re-iterate our opening, general comment about a master plan being needed for this whole area to the west of Hereford city. Cre25/10 comment is also relevant here.
We note the landscape comments that 'this site has no capacity on its own for housing due to its openness and isolation from other residential development.....in its current status any development would be illogical' and feel that these together with the poor access to facilities and active travel facilities (shared with Cre25 amongst others and contained in the public transport comments within the technical summaries) make this site undeliverable in the next decade. These sites are simply not sustainable development.
2. There is no mention of this site being in the green (zone2) of the SPZ and there should be. This is a major constraint on the development potential of this site and the risks should be assessed now, along with those posed by the 3 Elms SUE already under consideration
3. Soils – like other sites under consideration this is identified as grade 2 agricultural land which is very good quality.
4. Archaeology – in view of the importance attached to this site in particular and the likelihood that these significant features have already been damaged, there should be one study covering this site and also Thr21 and Thr22.
5. The mention of the historic Brecon railway also applies to Thr19 but is not carried forward into its site summary. This is inconsistent. However we do not believe the comment to be particularly relevant in either case – unlike some other comments that are missed altogether in the summaries- as the line of the railway is only preserved in hedgerows and the occasional isolated bridge. Employment site ES1 would completely obliterate the remaining traces if it were to go ahead.
6. Our comments on the unlikely impacts on the Huntingdon conservation area are also relevant here. (Thr21/5, Thr22/8 etc.) As the site summary says the 3 Elms SUE is to the east and north of this site and thus shields the conservation area from any impacts. To the best of our knowledge none of the buildings in Huntington hamlet closest to this site are listed – they are modern farm buildings. Of much more concern to the parish council is the potential for inappropriate design such as three storey town houses in any of these locations especially along the Kings Acre Road frontage.

7. We do not understand the comments about the preferred red route for the proposed bypass reducing the housing potential of this site. This should be explained more clearly as the preferred red route alignment is completely within the 3 Elms SUE
8. There should not be a separate access to this site from Kings Acre Road. Our general opening comments and those at Thr19/7 and Thr21/1 about junctions along Kings Acre Road are also relevant to this site
9. Site Thr28 borders this site, it is dismissed as a potential housing site yet it is considered to have potential for a variety of junction/access points to this site or to provide land for the red route, proposed western bypass junction.
 - a. First, any such use would completely destroy the thriving businesses on Thr28 and reduce local facilities considerably.
 - b. Second our view is that if there is insufficient room for a junction large enough to serve a development of this size (520) on this site through Thr28 and that there is potential for an even bigger development in combination with Thr19 (an additional 260 units) then access should be to the north via ES1. The proposed western bypass will simply not work if housing sites feed into bypass junctions immediately. We will be repeating the mistakes made at other towns like Worcester.
 - c. Finally, this site meets the arbitrary size requirements to be considered a SUE (particularly if combined with Thr19) and should be master-planned in a similar way. In fact the whole NW quadrant of Hereford city must have its own master plan as we say in our opening, general comments.
10. We note what the site summary says about proposed caps on development and preference being given to the strategic sites. Our opening general comments and those at Cre25/7 are relevant here.
11. There is nothing about a transport assessment being required for this site unlike the some other sites under consideration locally. This is inconsistent. As previously noted there should be a holistic transport assessment of the impact that traffic from all these sites might have on the routes into Hereford from the west.
12. The Open Space requirements 'contribution will be asked for towards outdoor sports provision in Hereford City etc.' does not appear in the technical summaries of other potential housing sites along Kings Acre Road and this is, once again, inconsistent.
13. Our comments about the flood risk from overland flow at Thr19/10 also apply to this site

Thr 35 Wyevale Garden Centre

1. Permanent employment opportunities locally would be lost if this site were to be developed for housing like Cre25
2. While there may not be any landscape constraint on the development of this site, the meaning of the green buffer – which is to be retained - is unclear unless you read the technical summary. Our previous comments highlight the need to be consistent with comments on boundary screening (Cre25/5, Thr19/4. Thr22/4 etc.)
3. There is an implication that the existing access/exit of the garden centre is inadequate. Surely this currently generates as much traffic as a potential 80 home development??
4. Please see our Cre25/6 point about the need for a completely new junction on the A438. We would not want a separate junction onto the A480 followed closely by another at the

- A480/438. The transport assessment that is apparently required for this site – but not others – should be extended to the whole western approaches to Hereford
5. As with Cre25/10 the Parish Council disagrees most strongly with the use of the term ‘urban form’ here. It is wrong and misleading. It does not capture the nature of this area at all.
 6. We note what the site summary says about proposed caps on development and preference being given to the strategic sites. Our opening general comments and those at Cre25/7 are relevant here.
 7. Our comments that the meaning of the phrase ‘the scope and developments to be considered will need to be confirmed’ is unclear apply here. See also Cre25 and Thr19. Presumably this applies to every site but not every site summary includes it.
 8. We note that this is one of the few potential housing sites being considered in the area that apparently requires a contribution towards outdoor sports and, in this case, on site provision. Inconsistent. Such is the potential scale of housing development in the NW quadrant of Hereford to 2031 and beyond that there should be one strategy for the whole area to which all developments contribute
 9. Like so many site summaries this one says ‘until finalisation of this section of the route for the relief road is completed, its impact on this development is unknown’. The preferred red route is known, only the detailed alignment, engineering and final confirmation remains. This is inconsistent. As previously noted by the Parish Council the HTP – as long as it focusses almost entirely on the proposed bypass – will not provide any meaningful additional network capacity for developments such as these unless future residents wish to leave the city.
 10. Our comments under Cre25/11 about poor public transport and active travel connections/infrastructure currently making development here totally unsustainable are equally relevant to this site. A wonderful opportunity to develop a sizeable park and ride facility serving the whole NW segment of Hereford is being missed. One of these sites should be designated for this purpose. Once again we stress the need for a master plan for the NW segment.

3. Site specific comments – River Wye Special Area of Conservation (SAC)

Bel 08 Former Belmont Golf Course – we will focus primarily on the landscape and heritage objections to any development on this site but not that there are also serious constraints on access, sustainability and that the HTP may negatively impact on current connectivity

1. We are surprised that this site is even being considered for housing. It borders the SAC which forms the southern boundary of Breinton parish. It is an elevated site, overlooking the valley, an area of high, picturesque, landscape value and would be highly visible, not least from the Wye Valley Walk. Development here would adversely affect the setting of Warham House on the northern bank of the river in Breinton which shares a parkland setting – possibly designed by Repton - with Grade 2 listed Belmont House to the south. This is not mentioned in the summary. We would not support the extraction of sand and gravel from this site. We agree with the site summary that there are significant constraints to the more intensive use of this site; in fact we believe that the constraints are overwhelming and

insurmountable. How can the listed building designation box say 'n' when the same summary talks about listed Belmont House?

2. There should not be a 'minimal desire to introduce additional development here'; there should not be any desire at all to develop in this highly sensitive and historic setting. A potential capacity of 50 units is ludicrous
3. However if development were ever to be allowed in future it should not only be limited to the footprint of the modern building but also include restoring the Listed Belmont House.
4. The highway appraisal concludes that the site is suitable but no improvements should be necessary if there is a minimal desire to develop. If access was sufficient for any traffic generated by the former hotel and golf club then it should also be adequate for any development on the site unless standards have changed.

4. Site specific comments – Adams Hill

Thr23 – Land north of Lower Hill Farm. WE DO NOT BELIEVE THIS SITE IS SUITABLE FOR FURTHER INCLUSION IN THE HEREFORD AREA PLAN

1. We believe that the site map is badly drawn as it includes the allotments. Presumably this is a mistake?
2. As with previous site comments the Parish Council would support a thorough archaeological assessment of the site prior to any development should it be continued further as being suitable for housing in the future.
3. We agree totally that this site forms part of a sensitive landscape. The landscape and visual impacts of developing this area would be significant as it forms part of the raised rim of the bowl in which Hereford city sits and they should be assessed. There are especially fine views of the city and cathedral from Adams Hill. The fine 'long distance views in all directions' referred to in the site description of Thr24 – which is rightly dismissed as a potential housing site – are shared by Thr23
4. We fundamentally disagree with the comment that 'the only likely acceptable location for access is onto the A438 Kings Acre Road. There is no evidence given to support this conclusion nor is the source of this opinion made clear. Indeed there are other possible access points including the purpose built roundabout at the Wordsworth Rd/Westfaling Street junction. Our comments about the need to minimise the number of junctions along Kings Acre Road (See Cre25/65 for instance) are relevant here. Such an access road would reach Kings Acre Road directly opposite the putative access to sites Thr21 and Thr22.
 - a. The field through which any access road would pass is already the location of a new water storage pond. The flood alleviation scheme which drains into this pond seeks to prevent the recurrence of surface water flooding from the steep hillside to the south into the Fayre Oaks static caravan park and the Huntsman's Drive/Bridle Way housing estate. It has not proved adequate to prevent the field continuing to flood (2018 pictures can be provided).
 - b. Our comments under Thr21/1 regarding the avenue of lime trees along Kings Acre Road are also relevant here. Any road access/junction necessary to facilitate development of this site would destroy a good number of these trees on both sides of the road

- c. The northern part of this site by Kings Acre Road is right on the historic western boundary of Hereford city. At this point Kings Acre Road is unfortunately largely a finger of ribbon development extending westward out of the city. This ribbon acts as a physical and visual barrier to the rural area south of Kings Acre Road. The adopted Breinton NDP seeks to retain the last few remaining gaps in the Kings Acre Road frontage to retain brief glimpses of the countryside beyond it and access to it. This countryside is enjoyed by locals as well as residents from the Whitecross and Greyfriars wards of the city for informal recreation and has a good number of public rights of way. It is a wedge of open countryside extending deep into the city. It would be detrimental if the HAP allowed the infill of this last remaining gap in the Kings Acre Road frontage that is in Hereford and allowed ribbon development right up to the city boundary.
5. There are acknowledged road capacity issues in the area yet no transport assessment for this site is considered necessary apparently (like Thr26a/11). This is inconsistent compared to other sites locally. We note uniquely, that this site does not currently have Highways support according to the technical summary.
 6. What exactly is meant by the statement 'area extending close to Kings Acre Road south just past the caravan site is considered to have less (landscape) impact'? If it means more suitable for housing then this is exactly the area that remains prone to flooding (see point 4 above). As the Environment Agency overland flow flood risk maps show, this is an area of high risk. A road here, plus potentially housing along it could easily make matters worse. Breinton residents along the south side of Kings Acre Road would be particularly concerned at any worsening of the current situation in the fields behind their homes. Water ponds up in these every year. Development on land north of Lower Hill Farm could easily exacerbate existing problems
The open farm land south from the continuous boundaries of the caravan site and the Huntsman's Drive/Bridle Way estates rises straight away towards Lower Hill Farm itself and development here would become highly visible almost immediately. We do not agree that it would have less impact.
 7. There is no mention whatsoever of soil quality for this site in the site summary. This is inconsistent
 8. The site description mentions development south of the cemetery being suitable and then says that the cemetery needs to expand. These two statements potentially conflict – does the estimated site capacity (420) include the possible land take for the cemetery or not?
 9. We note that the site capacity (420) is close to the arbitrary 500 units used to define a SUE in the Core Strategy.
 10. We note what the site summary says about proposed caps on development and preference being given to the strategic sites. Our opening general comments and those at Cre25/6 are relevant here.
 11. This site is not acknowledged as being in the source protection zone (SPZ) – a major omission. In fact it covers part of the innermost (red, 1) zone and the outer (green, 2) zone. Our comments under Thr21/7 apply with equal force to this site. The SPZ is a major constraint on the development potential of this site and its 'only acceptable access point'. The risks should be assessed now like Thr26a/2 and certainly before the site is adopted by the HAP

4A Former Whitecross SUE

1. The site above - Thr23 - is essentially a re-presentation of the urban expansion area that was rejected in the Core Strategy (Revised Preferred Options background paper) dated October 2011. The reasons for rejection were
 - a. General - 'much of the land at Whitecross is elevated and forms a green corridor which is not as well suited to development as the other proposed sites for urban expansion. Breinton Ridge marked by a green lane and bridleway is the area that has high landscape value as a particularly visible landscape resource.....In access terms most traffic would use the Barton and Whitecross roads which are already heavily used with over capacity junctions entering the city at peak times'
 - b. Access - 'The Three Elms site could be accessed by the existing highway network (*including Kings Acre Road*) but some junction improvements would be required. There are concerns expressed within the SHLAA that the existing road network is not suitable to support the Whitecross site and a greater reliance on public transport would be required.
 - i. Using the existing available information regarding traffic modelling and local highway requirements, the Whitecross site would have the greatest implications on the network of all the strategic sites proposed'
 - c. Landscape character – 'Specific landscape character analysis has been undertaken on the strategic sites which highlights areas (as Homer West) and Whitecross as the least favourable in landscape terms'..... 'therefore if the protection of landscape were the most important factor in determining the choice of sites then the areas to the.....and west at Whitecross would be the least favourable'
 - d. Flood Risk - The surface water flooding information shows that access to the Whitecross site could be constrained by surface water flooding'. The sites that would be viewed as least favourable on flood risk include Whitecross.
 - e. Minerals – Parts of the Whitecross sites are covered by safeguarding minerals policy within the UDP
 - f. Consultation response – The western expansion area (Whitecross) would be the least favoured if the public response to the strategic sites was the only basis for choice. On the free write text the strongest concerns regarding why sites were unfavourable were the loss of farmland (consistently an important factor) followed by landscape character.
 - g. Overall conclusions – Whitecross and Three Elms do appear to be the least favourable sites when taking a variety of factors into consideration. Further assessment of the landscape character highlighted areas of Holmer West and Whitecross as being particularly vulnerable to change.
2. When the Core Strategy was examined in 2015 the Inspector agreed with these conclusions saying in para 20 of her report 'The location of the strategic sites has been carefully considered over a long period of time. Other sites put forward were less sustainable, were of greater landscape sensitivity, had greater infrastructure demands or were not preferred by locals'

3. This conclusion has not changed. None of these reasons for rejecting the Whitecross site have altered, nor has there been further work to show that they are misplaced. What has changed is that development of housing at both the Holmer West and 3 Elms SUEs' is now approved Core Strategy policy. Even at a reduced size it makes no sense to develop the Whitecross site in addition to these two SUEs' given the strong reasons for rejection in 2011, the Inspector's confirmation of these reasons in 2015 and the scale of development for the NW segment of Hereford that is already in the planning process.
4. The above October 2011 paper says that 'the remaining houses (outside the SUE's) would be dispersed within and around the city and mainly identified through the preparation of the Hereford Area Plan (HAP)'. This dispersal is patently not being followed by the HAP now given the proximity of Thr23 to Three Elms and the contribution all the other sites discussed here are clearly anticipated to make to the inflated housing totals for the city. The north west of the city is obviously expected to provide the sites for the majority of the new housing proposed by 2031.

4. Employment sites

ES1 – Livestock market

1. This is the only one of the five sites under consideration to be supported as a future employment site. It's additional to the 10ha of land for employment in the 3 Elms development. The consultation document justifies the need for still more land by saying at paragraph 2.22 that 'employment land at Rotherwas is quickly filling up as the take up rate for businesses wishing to locate here since the Enterprise Zone and Local Development order designation has been higher than historic building rates. It is likely that the land will be full to capacity in the next 5 years'. However the Parish Council sees no sign yet that this rapid take up rate is generating the number of jobs anticipated @6000 much less the traffic flows that a workforce of this size might be expected to generate if they did not live locally. It would appear that the need for the extra land that this site could provide is to
 - a. Try and cover the shortfall in job creation that is now becoming apparent and
 - b. as part of a deliberate plan to re-balance the city with more work and housing north of the river i.e. NW quadrant. Why is the Moreton on Lugg site not being considered in this context?
2. Paragraph 2.25 of the consultation document lists the criteria for choosing employment sites. Amongst these are 'proximity to A Roads suitable for heavy goods vehicles with access other networks'. Highways England's own data makes it very clear that this area has very few road dependent businesses nor are they likely to attract the low land use, high tech, well paid jobs that the city needs. This criterion should be deleted since employment sites that generate heavy vehicle traffic and which are car dependent are exactly the opposite of what is needed.

5 Summary answers to your questions

Question 1 Do you agree that the sites that have been identified as having potential are the most suitable sites to consider for future housing development? If there is a specific site you have concerns about please identify the site in your response

1. The Parish Council has many concerns about the potential scale of housing growth over the next decade in the NW segment of the city in addition to the 3 Elms and Holmer SUEs'. This is not the strategy of dispersing new housing outside the SUEs' within and around the city i.e. dispersal that the public have repeatedly voted for during various consultations is in danger of being ignored.
2. If all – or even a majority of these sites were to be developed even in the medium to long term then there should be a master plan for the entire NW segment to deal comprehensively with the infrastructure needed and in particular the environmental consequences. The transport implications of some 4000 homes trying to access city services would be a priority topic – the proposed western bypass will not address these access is SUEs', it will simply help anyone who wishes to avoid the city.
3. We have concerns about all of the sites in this response – see our individual site by site comments but in particular
 - a. Thr23 and Bel08 should not proceed any further and should not appear in the final HAP
 - b. Thr19, Thr26a, Thr35 and Cre25 should not be developed in isolation from each other and should be subject to a separate master planning exercise if any were considered suitable.
 - c. Thr21 and Thr22 should not proceed independently of the 3 Elms SUE
4. The urban village (Cen21) should be developed so that it contains the maximum number of homes in this sustainable location. The 800 contained in the Core Strategy should be a minimum number like the other SUEs' (Our general comment 1.2 refers)

Question 2 Do you think that there are other more suitable sites not shown on the plan that could be considered as future housing allocations?

Not in the NW segment of Hereford city which is the area we have focussed on

Question 3 Do you think any particular sites should be developed in the short, medium or long term?

Given the potential impact of 'caps' and the priority being afforded to the SUEs' (Our comments under 1.8 and Cre25/7 refer) none of the sites we discussed in detail earlier should be developed in anything other than the long term and only then if it requires master plan and transport studies are done covering all the sites and surrounding areas. Thr23 and Bel08 should never be developed

Question 4 Do you agree that the sites that have been identified as having potential are the most suitable sites to consider for future employment land development?

No. See our detailed comments on ES1. If this site were to be developed it should be for high technology, valued added businesses and not those that rely on road transport to ship goods

Question 5 Do you think that there are other more suitable sites not shown on the plan that could be considered as future employment allocations

Yes – Moreton on Lugg. Although this is clearly outside the HAP area employment opportunities should not be solely assessed within the city boundary and the Moreton on Lugg site has direct access onto the A49 as well as potential rail links

Q6 Are there any sites being considered in the site options that could be suitable for use solely or in part for other uses such as university educational buildings, student accommodation, community and leisure uses or other commercial activities?

Not amongst the sites we have considered

Q7 Do you think there are other more suitable sites not shown in the plan that could be considered for other uses as set out in questions 6 above?

No, not in the NW segment of the city

Q8 Do you have any comments on the document and the approach use to identify potential sites?

Please see our general points in paragraphs 1.1 to 1.9 inclusive

Yours sincerely

Tony Geeson
Chair Breinton Parish Council