

# BREINTON PARISH COUNCIL

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15 September 2022

Heather Carlisle  
Planning Department  
Herefordshire Council  
Planning Services  
PO Box 4  
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Dear Ms Carlisle

**P222138/O - Land at Three Elms, NE Quarter. To the north east of Huntington and bounded by Three Elms Road and Roman Road**

**Land at Three Elms \*Application\* - Outline Planning Application with all matters reserved, except access, for the first phase of an urban extension comprising up to 350 homes (Use Class C3); park & choose interchange; together with open and play space, landscaping, infrastructure and associated works**

Breinton Parish Councillors considered this application at their meeting on 14<sup>th</sup> September and remain extremely concerned that, despite another two years for consideration, investigations and reflections, the applicants and their agents have given so little attention to the Parish Council's previous lengthy and detailed representations dated 3<sup>rd</sup> November 2016, 27<sup>th</sup> March 2017 and 26 October 2020.

Nevertheless, we welcome the opportunity to review, re-emphasise, supplement, and repeat where necessary our previous representations despite the need to read 71 supporting documents and 8 drawings. Even though this reduced scheme – phase 1 of an urban extension – is geographically as far away from Breinton Parish as is possible on this site; some of our key points remain valid. Given the climate emergency, the loss of bio-diversity and the years passing by, the concerns summarised below are even more important in our view. We urge you to read our previous submissions again in full. We will not repeat them here in the such detail.

## **1. General Comment**

It would appear that despite all the expertise at their disposal the applicants still have not fully recognised that the policy context has fundamentally changed in the past two years at both the strategic and local levels. The proposal lacks ambition and could have been proposed anytime in the last 40 years or so. Herefordshire should learn and avoid repeating all the mistakes so evident in the Belmont developments or more recent developments along the Roman Road.

In particular, but not exclusively there have been the following changes to the policy context;

- The Church of England's General Synod of February 2020 committed the Church to becoming carbon net zero by 2030

- Herefordshire Council has declared its recognition of the climate emergency. It has identified positive actions to reduce carbon emissions that arise specifically from travel-to-work and travel-to-school by private cars within and across the city and to implement schemes that make possible more green travel, public transport, cycling and walking.
- Department for Transport Local Transport Note 1/20 on cycle infrastructure design (dated July 2020)
- Herefordshire Council has abandoned both the Southern Link Road and the Hereford Relief Road.

## **2. Access**

- a) The Parish Council fears that the implications of such poor highway choices may set adverse precedents for Kings Acre Road should there be any further phases of development in future closer to Breinton.
- b) The Parish Council considers that the unchanged proposals for Three Elms Road remain short sighted, are likely to increase accidents and will certainly hinder traffic flows. They simply add another junction to an already busy road and one that will be heavily used as the southern exit from the proposed development. Our view remains that a much better solution would be to build a single, higher capacity/full sized roundabout close to the Three Elms public house to access the development and for Sandown Drive, 3 Elms and the Tillington roads.
- c) To compound this error, the access parameter plan still has a cycleway and footpath exiting the site at its far NE corner close to the junction with Tillington Road where we would suggest a roundabout. In our opinion, an exit at this point will put cyclists and pedestrians at unnecessary risk particularly as we cannot see any mention of off-site calming measures on Sandown Drive / Grandstand Road or for ongoing cycle routes beyond the actual site Visibility at this junction is poor for all concerned, surely it is substandard by modern criteria?

## **3. Flood risk (see also 3/11/2016)**

- a) The Yazor Brook catchment to the north-west of Hereford city is currently being developed in a piecemeal fashion, sometimes via small sites and on occasions larger ones such as Three Elms. Each one is trying to solve their own potential flood risk without consideration for the area as a whole. What is needed is a holistic approach.
- b) As such the Parish Council remains concerned that the proposed development will have adverse knock-on flooding effects for other locations including properties along Kings Acre Road despite their distance from the phase 1 site. As the geological cross sections previously produced by the applicants clearly demonstrate; the fields south of KAR are also part of the Yazor Brook catchment as well as the Ground Water Source Protection Zones (1 and 2a). Changes to one part of the catchment may well have implications elsewhere
- b) We have long argued that a complete, independent hydrological survey is needed for the whole Yazor Brook catchment south of the Roman Road and east of Credenhill. This needs to be concluded prior to any more major housing developments to the north-west of Hereford city. The fact that eight retention ponds are felt to be needed for the for phase 1 of this proposed development alone indicates that there can be a considerable amount of surplus water to be

dealt with on occasions. The Flood Risk Assessment (FRA) is intended to show that *'the proposed development is safe from flood risk and that flood risk elsewhere in the Yazor Brook catchment does not increase as a result of the development.'* We suggest that the FRA does not do this adequately.

Yours sincerely

Emily Godsall  
Breinton Parish Council Clerk