

18th October 2023

Planning Services,

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Ref Planning Application P222138/0

Herefordshire Council have currently failed to consult with Active Travel England (ATE) in respect of this application.

From 1st June 2023 Active Travel England became a statutory consultee on all planning applications for developments equal to or exceeding 150 housing units, 7,500 m² of floorspace or an area of 5 hectares. The application is for an initial development of 350 homes and so ATE need to be notified of this current application, particularly as ATE are there to help planning authorities in their work to implement good active travel design – for example, by ensuring developments include walking, wheeling and cycling connectivity to schools and local amenities. This will help improve public health, save people money and reduce harmful emissions. Building in active travel at design stage will also help to avoid big increases in vehicle traffic and reduce the need for costly upgrades to major road junctions or other corrective action in the future.

At a meeting of Breinton Parish Council held on 4th October 2023 the council resolved to maintain their original objection to this development.

IN this letter, Breinton Parish Council object to and comment on the amended plans submitted September 2023 on the following grounds.

The outline proposals still show a car centric design to this development with the outline proposals showing low density housing, with an urban sprawl across high grade agricultural land and pose a risk to damaging potable fresh water supplies and flood risk to existing developments below the level of this development.

Breinton Parish Council maintains that a complete and comprehensive hydrological survey is required for the Yazor Brook catchment South of the Roman Road and to the East of Credenhill, prior to further major developments in the north east of Hereford.

Regarding Access

The revised drawings continue to show that the access from the roundabout junction with the 3 Elms Road heading South is a 3m wide shared cycleway/footpath. This fails to comply with LTN1/20 as it poses a risk to both cyclists and pedestrians by having shared space. This section of the active travel access route is likely to be the most direct to link the housing accommodation with the primary and secondary schools and so cyclist and pedestrians should be segregated in a well-designed active travel scheme. Consultation with ATE should help inform improved design in this area.

At the roundabout junction the cycle path heads south onto the shared space path via a “controlled cycle crossing”. We object to motorists being given priority over cyclists and also pedestrians particularly as this will be the main safe route for access to important destinations such as the local schools and health services especially as this would appear to be contrary to guidance in LTN1/20.

The cycleway just to the north of the roundabout junction with Grandstand Road, does not make it clear how cyclists will connect safely with the cycleway proposed for Grandstand Road. To be effective, cycle path design should be well connected and continuous, not having gaps in design, particularly when joining a road such as 3 Elms and right by the junction with the GP surgery.

The Junction at Roman Road shows that again cyclists and pedestrians have to share space along the spine road. The new spine road could prove an attractive route for cyclists to cut down through the new estate towards Hereford centre and so this should be upgraded to a separate cycleway and pedestrian walkway through the development, to comply with LTN1/20, particularly as the “park and Choose” site appears to be located in this area. Despite the existence of a popular cycle path on the Roman Road, at this junction priority is being given to motor vehicles whilst pedestrians and cyclists are expected to use a refuge which is poor design. Again, consultation with ATE should help improve the designs to enable good access by active travel means.

Flood risk mitigation from runoff

With respect to new road construction, we are concerned that the revised and expanded SuDs drainage proposed will not contain the volume of water generated by the runoff from this development when combined with the climate change induced increase of total catchment runoff, given that the City of Hereford frequently floods downstream, despite the extensive historic SuDs engineering and construction to reduce divert flow upstream of the proposed development site.

The proposed new road infrastructure development will increase this risk and requires extensive retention ponds and flood containment based on the hydraulic model and hydrology studies undertaken, detailed in Appendix F, of TetraTech’s Flood Risk Assessment & Drainage Strategy for this site dated 17 August 2023. The increasingly complex extent of mitigation measures required speaks volumes for the inadequate nature of this development site upstream of the biggest urban concentration in the county.

Ground water contamination

We have reviewed the latest version 8 of TetraTech’s Flood Risk Assessment & Drainage Strategy for this site dated 17 August 2023 and can confirm our concerns for the protection of the potable water supply from road construction and the necessary mitigation measures, particularly the containment of runoff from road infrastructure notably in Sections 2.5.16 and 2.5.20:

The EA advised that a number of new SPZ’s at the location of the proposed development have only recently come to light. The Heineken SPZ was modelled in 1992 and it has not been possible to ascertain why the other boreholes were not similarly modelled at that time, or at a later date. However, these boreholes are providing water that could be used for human consumption, and therefore need protecting and consideration in relation to the proposed development application.

2.5.20 The EA has stated that detailed design of the development will need to be finalised based on the newly modelled SPZs once produced.

We are awaiting the updated SPZ modelling outcome to be available at some time this Autumn, but our concerns on the protection of the important commercial aquifer remain.

Yours sincerely,

Lisa Law

Clerk

Breinton Parish Council.