

BREINTON PARISH COUNCIL

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Thursday 21 April 2022

Simon Rowles
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Planning Services
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By email only: simon.rowles@herefordshire.gov.uk

Dear Mr Rowles

P220810/F - Little Haven, Conifer Walk, Hereford, HR4 0SW - Proposed demolition of existing buildings and erection of eight dwellings with drainage and associated works

The Parish Council have considered the above application and OBJECT to the application for the following reasons:

Access

The layout provides a narrow route to the four properties to the south, and the whole access to the site has limited width for vehicles to pass safely, with no safe, segregated space for pedestrians and cyclists.

The current application seeks to increase car parking from 5 to 14 spaces (The Design and Access statement says 2 per dwelling i.e. a total of 16 spaces?) and yet there is no mention of covered cycle parking or a safe route in and out of the site by means other than car, ignoring the needs of pedestrians and cyclists.

The lack of adequate provision for travel by modes other than by car and the anticipated increase in vehicle is contrary to Dept for Transport LTN 1-20, paragraph 14.3.12.

Cycle Infrastructure Design LTN 1-20, paragraph 14.3.12 states 'Cycling facilities should be regarded as an essential component of the site access and any off-site highway improvements that may be necessary.

Developments that do not adequately make provision for cycling in their transport proposals should not be approved.'

The Council believes that the current proposal over develops the site and with 2 car park spaces for each property, will increase vehicle movements, particularly those entering and leaving the site Via Conifer Walk.

It is it noted that there are no current proposals to improve the junction and access for cars and pedestrians onto/from Kings Acre Road. Conifer Walk is a narrow, private, and unsurfaced road with no separate provision for pedestrians or cyclists. There is general local concern, which is confirmed by the police, regarding the speeding along Kings Acre Road. The applicant states that the application is unlikely to generate an unacceptable level of traffic and the site will no longer be used for commercial vehicles however, the parish council do not agree that 8 extra dwellings will not alter the traffic flows appreciably,

Herefordshire Core Strategy - Policy MT1 states 'traffic management, highway safety and promoting active travel ensure that developments are designed and laid out to achieve safe entrance and exit, have appropriate operational and manoeuvring space, accommodate provision for all modes of transport, the needs of people with disabilities and provide safe access for the emergency services'.

Climate Emergency

The current proposal is car centric, despite the site being a location that is less than 15mins cycle away from the city centre along flat route and close to regular bus services into the City centre along Kings Acre Road. With no provision of alternative means of transport, except for cars and their storage, the application ignores the Herefordshire Council's declaration of a climate emergency and is contrary to Policy SS7 of the Core Strategy.

"Core Strategy Policy SS7- Addressing climate change:

Development proposals will be required to include measures which will mitigate their impact on climate change....delivering development that seeks to reduce the need to travel by private car and which encourages sustainable travel options including walking, cycling and public transport;

Drainage

A drainage report has been submitted with this application, unlike the previous application, which shows that noted that soakaways are the sole drainage system. However, concern is raised by the further hard surface and the focus of water into soakaways which may have an effect on other areas 'downstream'. There is already a known problem with surface water flooding behind houses on Kings Acre Road to the east.

Reducing the hard standing for cars, and limiting any car parking to the entrance to the site, would reduce the water runoff from the much more intensive development proposed.

Core Strategy Policy SD3/5 requires that "development includes appropriate sustainable drainage systems (SuDS) to manage surface water appropriate to the hydrological setting of the site. Development should not result in an increase in runoff and should aim to achieve a reduction in the existing runoff rate and volumes." SD3/10 states that "in particular, proposals do not adversely affect water quality (...) through unacceptable pollution of surface water or groundwater."

The local residents have raised concerns over existing, long standing issues with the sewerage system. During heavy storms the foul water has been reported to back up into current properties due to the age and lack of capacity in this area. Increasing the number of dwellings can only exacerbate this problem.

Core Strategy Policy SD4 - Wastewater treatment and river water quality

5.3.67 Herefordshire Council will expect developments to connect to existing sewage infrastructure. However, when this would compromise the ability to achieve favourable condition, and potentially be contrary to the Habitats Regulations, mitigation measures would be required if the development is to proceed.

5.3.68 Local water companies are responsible for providing and maintaining sewage treatment works at a standard to meet permitted conditions. Their asset management programmes will set out capital works to ensure compliance with discharge licences. Should such works be required then it may be necessary to phase new development within timescales set by these programmes. However, there may be an additional requirement for developer contributions or community infrastructure levy funding to make further improvements.

Waste Provisions

The application does not appear to accommodate any provision for waste, and given that the new collection regime will involve additional bins households this needs to be taken into consideration.

Breinton Parish Council objects to the planning application for reasons relating to the access, climate emergency and drainage matters which are not compliant with numerous Core Strategy policies.

Yours sincerely

Emily Godsall

Breinton Parish Council Clerk