

BREINTON PARISH COUNCIL

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Planning Services

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Sent by email: elsie.morgan@herefordshire.gov.uk

Dear Elsie Morgan

P222921/F Banbh Farm. Proposed are five Glamping pods for guest use along with one service cabin, wildlife pond and parking/turning facilities. One parking space per pod is proposed all offering the option of EV charging. Refuse / recycling and secure bike storage facilities at the entrance to the site / parking area. Associated footpaths, proposed wildlife pond and landscaping

Banbh Farm has a long and contentious planning history. The previous application from this owner was for a large agricultural barn which was refused on appeal. An earlier owner developed proposals for holiday cabins.

The site consists of south sloping rough, unimproved pasture/scrub land. Its' southern boundary is the River Wye Site of Special Scientific Interest/Special Area of Conservation (SSSI/SAC). It is only suitable for extensive rough grazing not the kind of intensive agriculture using heavy machinery, pesticides, artificial and nitrogen fertilisers the applicant hints would be the consequence if this glamping proposal were refused.

Breinton Parish Council considered this application on 14th December at a meeting attended by ten concerned local residents. The Parish Council is totally opposed to this application and urges the Planning Authority to reject it outright.

The Parish Council has grouped its objections under three headings; Social, Economic and Environmental. The varying length of these sections is not because they are of different value – the Council places equal importance on all three – but because for this site there are different material considerations and factors on the ground in each case.

Environmental objections

Weaknesses in the Application Form

There are a number of completely incorrect and potentially misleading, answers on this form.

In answer to the question ' Are there trees or hedges on land adjacent to the proposed development site that could influence the development or might be impacted as part of the local landscape character' the applicant says 'No'. Policy B11 of the Breinton Neighbourhood Development Plan (the NDP) deals with green infrastructure in the Parish and amply demonstrates that the trees and hedges both on and close to the proposed development site are integral to the landscape character of the Wye Gorge. The applicant is proposing significant amounts of change to the green infrastructure of land under their ownership never mind any wider impact. They argue elsewhere that the green infrastructure locally is one of its attractions which is why they have applied for this glamping site. The Parish Council would argue that correct answer is 'Yes' and that the Planning Authority should

use its discretion and require a full tree survey prior to progressing this application since the answer to the first question in the Trees and hedges section is 'Yes' and the answer to the second question – above – is incorrect.

Similarly; all three questions about biodiversity and geological conservation on site or on land adjacent to or near the site are answered 'No'. However; there are protected and priority species along this stretch of the River Wye including otters, bats, badgers, peregrine falcons and great crested newts. These have all been officially recorded over many years. As far as designated sites are concerned, as has previously been noted the River Wye itself is an SSSI/SAC – the highest possible forms of environmental protection. In addition, Breinton Gorge and the steep sided cliffs – known as Red Rocks - that actually face the proposed glamping site from across the river - are a Local Geological Site listed in the current Core Strategy.

The omission or ignorance of the facts is regrettable. The Planning Authority should require this to be corrected and the appropriate surveys undertaken. As the application form itself says, 'failure to submit all the information required will result in the application being deemed invalid and it will not be considered until all of the information required has been submitted.'. The Parish Council strongly supports the Ecology Officers objection and their requirement that a detailed ecology assessment is required.

Non-compliance with Local Planning Policies

The DAS takes some considerable length to assure the reader that this glamping proposal is compliant with a range of local planning policies. Unfortunately, the DAS is riddled with factual and spatial errors and even if these were corrected the Parish Council utterly rejects the idea that this proposal is policy compliant in any meaningful way.

This view is confirmed by Herefordshire Councils own Ecology Officer in respect of their relevant policies SS1, SS6, SD3, SD4 and LD2. We note that a statutory Habitats Regulation Assessment is required and has to be approved by Natural England before the application can be progressed further and that the Council requires the information provided by the applicant to be beyond doubt, and with legal and scientific certainty. The Parish Council strongly supports these requirements

The reasons for our own rejection of policy compliance are explained policy by policy in the paragraphs that follow.

SS1 – Sustainable development We note that the applicant proposes to plant 13,000 native trees, place 200 bird boxes and 2 bee- hives as well as create an orchard of 300 apples trees. Even if it were possible to physically accommodate so many trees within the owned area – which we doubt, especially as the lower third of the owned area floods each year to a considerable depth – it would not itself make the development itself sustainable. The detailed work in the Eaton Camp Historical Society's objection to this application confirms our view that tree planting on such a scale is not credible given the space available. It is unfortunate that the applicant did not consult an arboricultural specialist when developing these proposals rather than after a decision is made as the DAS says is intended.

We observe that there are no tree planting proposals accompanying the application so that these intentions are neither part of the application nor enforceable. Appropriate trees should be planted in the right locations and a dense plantation such as appears to be being suggested, would not be appropriate on this stretch of the Wye Valley and might be termed 'greenwashing'

SS4 – Movement and Transport Banbh Farm's location – at the bottom of a steep hill in either direction – and distance from any meaningful services makes it extremely unlikely that any guests will choose 'to use sustainable transport methods to visit local shops and restaurants either by cycle or on foot'. The Manual for Streets sets a standard of a range of facilities within a 10-minute walking distance (around 800m), beyond this it suggests that the greatest potential for walking to replace short trips by car is 2km. This higher figure is corroborated by the

Institution of Highways and Transportation guidance document 'Providing for journeys on foot' that the preferred maximum walking distance is 2km or about 25 minutes. Previous recent applications for housing in Breinton have used these figures and suggested that for cycling a distance of 3k – or a time of 13 minutes - is similarly reasonable to visit even a limited range of facilities. In open countryside such as Breinton there are no facilities that might be of use to pod residents within anything close to these journey times or distances.

Coupled with this the statement that 'a 10-minute walk into Breinton Common allows guests to access public transport into Hereford' is false. There is no public transport in Breinton Common other than a single 'market day' service once a week into Hereford city returning almost immediately. This is one of many statements, apparently in support of the application, that demonstrate a complete lack of familiarity with the site, the parish, the area west of Hereford and the realities of rural public transport in general in Herefordshire

The reality is that Banbh Farm is accessed via stretches of narrow, undulating, unlit, poorly drained, C class lanes that include blind bends. They are not 'well maintained' as the applicant's agents suggest. The Parish Council has long campaigned for the creation of a 40mph rural speed zone across the whole parish without success to date. We are fortunate that Breinton's lanes are well used by hikers, dog walkers, horse riders, cyclists and runners – indeed stretches of them are part of the Wye Valley Walk a designated national trail, a point somehow missed by the applicants. The lanes are also used by extremely large agricultural vehicles, sometimes in convoy. The introduction of the equivalent to five small traffic generating homes with rapid turnover of guests as well as service traffic can only increase road safety concerns locally and potentially increase the risk of accidents particularly involving drivers lacking local knowledge. As Herefordshire Councils own Highways Department commented on this application 'It is an unsustainable location with no real alternative to travel by private car'

SS6 – Environmental Quality and Local distinctiveness The Parish Council disputes the agents' assertion that 'existing and new indigenous shrubbery and a cider apple orchard' will 'reinforce the identity of the surrounding area.' As noted later under MT1 the photographs provided of the site entrance / lane are misleading and the land area physically available for and the enforceability of the planting proposals are in doubt. What the proposals will do is significantly change the appearance of the area which the Parish Council does not see as beneficial as well as having significant 'knock on' effects for the setting of the Scheduled Ancient Monument across the river at Eaton Camp as well as the views from it into the Wye Gorge.

Neither does the Parish Council agree with the applicant's opinion that the proposed apparently extensive use of shrubs, trees, and bird boxes along with the wildlife pond will 'enhance the bio-diversity' locally. It is increasingly accepted internationally that there is virtue in re-wilding various areas which the Herefordshire Wildlife Trust are doing locally in the Lugg Valley amongst other places. The application form provided chose to ignore reference to the wildlife that is already recorded in the vicinity, passing through and foraging on Banbh Farm if not resident, and there is a strong case for 'leaving well alone' particularly for grassland flora, fungi and ground nesting birds. The Parish Council believes that the potential for noise, light and human disturbance in a currently un-occupied piece of land will actually harm biodiversity at Banbh Farm and result in a less natural environment.

LD1- Landscape and Townscape The Parish Council disagrees with many of the statements in this section of the DAS. The current proposal is capable of being expanded immediately should the principle of this sort of development on this site ever to be considered acceptable by the granting of planning permission. The permitted development right of a 'pop up' campsite already exists. The Parish Council fundamentally does not believe that the sort of permanent development being proposed is appropriate at this location.

In any case, as previously noted, 13000 new trees certainly will alter the existing landscape character. However sympathetic or complimentary the proposed units are, they are different in form, size and appearance to anything in Breinton. The statement that 'all existing trees and hedgerows will be retained' overlooks the fact

that considerable lengths of an historic hedgerow bordering an ancient routeway are to be grubbed up unnecessarily and replaced.

LD2 – Bio-diversity and geodiversity The Parish Council has already rejected many of the justifications made here under Core Strategy policies LS6 and LD1 earlier. We think that disturbance is largely unnecessary and potentially harmful. We note that screening is mentioned repeatedly and would suggest that this would not be so necessary if the proposed development really did not harm the existing landscape character.

MT1 Traffic management, Highway safety and promoting active travel It is not clear precisely what arguments are being put forward by the applicant to show compliance with this policy. What is clear is that more traffic will not improve safety as noted under our response to SS4 and that the removal of a significant length – 86m - of mature hedgerow in order to provide the apparently necessary visibility splays means that the entrance is no longer 'original'. Have these splays been deemed necessary by the Highways Authority? will the current earth layby/pull in that will form these splays be required to be tarmacked to the necessary highway standards? The pictures in the DAS (Figures 3 and 4 on page 9) and amongst the separate site photographs are old – apparently from Google Earth Street View and taken around 2009 as well as when the current owner purchased the site - and give a seriously misleading impression of the general size and height of the hedgerow today. A site visit will show the extent of the disturbance and destruction being considered and the semi-mature trees within the hedgerow.

References to the Wier Gardens and Breinton Springs Park and Gardens seem irrelevant. Trips from Banbh Farm would be additional, discretionary, leisure-based journeys and not replace any existing trips. Again, there are inaccuracies and illogicalities in this section of the DAS since there is neither a park nor gardens at Breinton Springs and despite being a considerably shorter distance from the proposed development site than the Wier, the travel time by bike to both locations is apparently the same at 20 minutes

E1 – Promoting Employment provision Please see our response under the Economic section of our comment that follows.

E4 – Tourism Please see our response under the Economic section of our comments that follows

SD1 – Sustainable design and energy efficiency Not for the first time, the Parish Council is unclear precisely what arguments are being put forward by the applicant in this section of the DAS to show compliance with this policy. Solar panels on the shared amenity cabin simply means that less electricity will need to be imported not that less will be used overall. Bringing more vehicles into Breinton increases travel and energy consumption even if they are electrically powered while users of the site will produce additional waste in a rural area that already suffers from littering and whose sole method of collection is through weekly dustbin rounds.

SD2 – Renewable and Low carbon Energy Generation Again the Parish Council is unclear how this section is supposed to demonstrate compliance with the policy? We note the statement that 'some of the following... 'will be incorporated – and that there is no commitment enforceable in planning terms or otherwise and the aim is to become carbon positive. We assume this wording is an error however it does illustrate the rather casual approach that has been taken to providing information in support of the application.

SD3 – Sustainable water management and water resources This proposed development will change the natural hydrology of the site especially if concrete pads are needed for the buildings as are mentioned in various places. Clearly no ground condition surveys have been undertaken yet. The new pond will also change water flow and its flora and fauna may well be compromised by new human waste on occasions when the proposed sewage system overflows as is planned. While the pond may well collect it will also concentrate surface water rather than letting it flow naturally into the river as happens now. We doubt that it will be sufficient to irrigate 13000 trees plus an orchard which will be an immense, expensive and time-consuming task for the 3FTE employees

should it be necessary. Planting on this scale will require significant amounts of management if it is to succeed particularly as climate changes.

The Parish Council will read with interest the responses from Welsh Water and Natural England on the proposed treatment of both naturally occurring and foul water from the applicants. We are surprised that the Environment Agency is not amongst the statutory consultees given their concerns about nutrient pollution of the river Wye, their enforcement role and their part in finding a long-term solution. Much more detailed information needs to be provided in our view backed by legally enforceable guarantees before this application can be progressed any further. This is a hugely sensitive site hydrologically adjacent to an already polluted river and there should be absolutely no chance of increasing pollution from any development. No waste or drainage plan is produced. The Parish Council strongly supports the Ecology Officers objection and these grounds along with their requirement that there should be a professional drainage report provided by the applicant.

SD4 – Wastewater treatment and river water quality Please see our response under Policy SD3 in the paragraph immediately above. The additional statements given here by the applicant do not inspire confidence and lack detail – ‘appropriately sized soakaways’ etc. The proposed wildlife pond may overtop and water draining from the pods and the shared amenity cabin will be concentrated into small surrounding areas of permeable surfaces rather than dispersed across a larger area as currently happens naturally.

The applicant claims that removing livestock from the site and replacing them with humans in glamping pods will reduce the flow of nutrients into the river. However the site is rarely grazed currently and certainly not intensively and the animal waste is natural. Given its land use history, the site currently contributes very little, if any, to the excessive phosphate and other pollutant loads on the river Wye. This should remain the position. Development represents both a change to the waste produced and an intensification of land use.

RA6 - Rural Economy Please see our response under the Economic section of our comments that follows.

Breinton NDP Policies B11 & B15 Green infrastructure and local distinctiveness. As is obvious from earlier comments, the Parish Council does not consider any of the ‘protection or enhancement of the wildlife corridors’ around the site being claimed by the applicant will outweigh the damage done. This damage includes the removal and replacement of the hedge along the northern boundary, the replacement of natural ecosystems with managed ones and the increased disturbance, light and noise pollution that will be introduced into what is currently a quiet, tranquil backwater. We doubt that there is room within the land owned by the applicant for 13000 additional trees and a 300-tree orchard and note that ‘various areas of wildflower planting’ is now also included to replace the naturally occurring flora. The major attraction of this stretch of the Wye Valley is its unspoilt nature and this proposal changes all this. We believe that the site is best left as close to nature intended as is possible, as a site of natural/seminatural grassland used for seasonal rough grazing that conserves the many protected and priority species that exist locally.

Social Objections

The Parish Council struggles to see that this application brings any benefits to local society that might outweigh its undoubted and demonstrable disbenefits.

If developed as currently proposed, Banbh Farm will add traffic to the local C and U class lanes potentially compromising safety for all users even more than at present, it will add noise and light pollution to the immediate locality which will be perceivable from a greater distance – including from up, down and across the river valley. The site certainly can be seen from the public highway and although the application casts doubt on this and as we noted earlier under the section on LD2, screening is proposed for an apparently, unobtrusive development for privacy and to control the carry of sound. Banbh Farm actually forms a natural amphitheatre with the cliffs of Red Rocks across the river reflecting and magnifying sound back across and along the valley.

The applicant sees the development of the site as a way of eliminating the chances of the land being misused for unauthorised field sports / motorised activities. The adjacent land-owner – County Councillor J Kenyon who supports the application in his submission – says he has real issues (which have been redacted) with the site and believes development could help alleviate and ease this (unspecified) situation. The Parish Council can categorically state that It has never been informed of any such problems on or around Banbh Farm. Local residents were surprised to read these statements and can testify that that the only events that took place on site over the past three years were under the current ownership. The Parish Council has reports from West Mercia Police at each and every meeting which have never mentioned local issues. The Parish Council believes that development of the kind being proposed may actually precipitate local nuisance rather than reduce/remove an apparently illusory problem.

As evidenced throughout our submission there are no facilities such as pubs, shops, clubs, cinemas, theatres or restaurants locally meaning that site users will spend time outside their pods on the decking provided or drive to find food and entertainment, potentially returning late into the evening. There will be additional disturbance for the relatively few local residents as well as for the wider parish community e.g. in Breinton Common along the access lanes throughout the year if the occupancy plans were to be realised. The consequences of any pollution, including any additional litter will have to be dealt with by permanent residents and not the site owner or its transient visitors. As noted repeatedly under our environmental objections; the relatively rich, surviving biodiversity of the parish, so valued by residents and visitors, may well suffer, potentially reducing the limited benefits of tourism which the parish currently receives.

Economic Objections

The Parish Council would have expected a business plan to accompany such a sizeable investment as is being proposed for River Tree Park on Banbh Farm if only to show that there is a realistic prospect of an adequate return on the investment, through a sizeable, growing and sustainable revenue stream. There is no business plan or economic justification provided for this proposal and little evidence of any market research. Instead, there are a series of unquantified statements that ‘guests will help Hereford businesses’ and ‘small local businesses will benefit’ and that the proposal offers ‘an economic stimulus to the area.’ This is extremely worrying for the Parish Council. In the worst possible case, the proposed enterprise would fail and the owners could seek to expand or change its use in order to survive. The principle of development should not be approved.

E1 – Promoting Employment provision This section of the DAS focusses mainly on the accessibility of the site. It is certainly not well connected to Clehonger as asserted which lies on the other side of the river. The closest crossing points are bridges either in Hereford or at Bridge Sollars. Similarly, assertions that the closest bus stop is just a mere six minutes’ walk away (in some paragraphs of the DAS surprisingly located in Almeley which is at least 25 minutes distance away by car from the development site) and that the site is a short distance from the A438 are incorrect. The site is not accessible to a wide range of people – as claimed – unless they travel by car. Those on walking or cycling tours will probably not be the clientele that the proposed luxury, waterside accommodation appears to be aiming for.

In trying to show compliance with **Core Strategy Policy E4 – Tourism and policy RA6 - Rural Economy** the DAS says that the proposed glamping site looks to support the development of new and existing tourist spaces’. This is not explained and any impact from five pods will be minimal at best. The single most attractive feature of the Wye Valley currently is its unspoilt nature. The Wye was once voted England’s most loved river. Ill thought out and poorly justified proposals such as this one risk losing more tourism income than they generate. The misleading information given about the proximity of the site to parts of the National Cycle route network, including some non-existent parts has been described in other letters of objection. This makes the Parish Council doubt if sufficient research has been done into the locality, its attractions as well as the ability of staff on site to advise its users in any meaningful way or for appropriate signage to be provided to local attractions provided.

The economic benefit of this proposal appears to hinge on the promised 3 FTE jobs it will create 'to service the pods'. These employees will, almost certainly have to travel to the site by car and will presumably be based in the shared service cabin. This is already the largest structure being proposed for the site, equivalent in area to between two and three of the actual glamping pods and appears very small for the purposes envisaged, once again this raises local fears that should this application be approved an almost immediate expansion will be sought.

In seeking to demonstrate compliance with **Breinton's NDP policy 13 – Countryside recreation**, the DAS lists a number of recreational activities that will be provided at the site. These include kayaking, yoga, pilates, fly and coarse fishing. No detail is given of how these will be accommodated, what if any new and additional structures will be required for them – or indeed if they will require planning consent. For instance, no structures such as a launching pier are proposed on the riverbank. This is beyond the actual application site in any case. Will such activities generate traffic as participants who are not residents travel to the site? We note that the two potential partner businesses actually named are based in Ross on Wye and Wolverhampton. Any economic benefits from these will not be local to Breinton or Hereford.

This proposal repeatedly confuses the undoubted attractions of the Marches including Herefordshire with those available in or close to Breinton and the wider UK. Statements such as 'demand for this type of accommodation is high throughout the country which has also been shown to be true of other glamping sites within the UK' are uncorroborated and no figures are given e.g. for site usage, occupancy levels, the growth and unmet demand at existing sites or projections for Banbh Farm. Even if such an analysis exists to demonstrate a financially stable business, is rural Breinton really a suitable site for such an enterprise?

Conclusions

The apparent lack of care and attention to detail that has apparently gone into preparing this application is regrettable. It undermines the planning process and shows a lack of respect for local people who will suffer most should this poorly thought, inadequately justified development be granted approval.

In Planning terms Breinton Parish Council does not believe that the application complies with national, county or local planning policy and fails to strike the necessary balance between the economy, the environment and society. In our view, there are few if any benefits supported by evidence. In contrast there are a significant number of clear disbenefits in each under each of the three headings. Quite simply there is no economic, environmental or social justification for this development to be approved.

Yours sincerely

Emily Godsall
Clerk, Breinton Parish Council