

Taylor, Susan

From: donotreply@herefordshire.gov.uk
Sent: 27 October 2016 17:38
To: Planning Enquiries
Subject: Planning application comment was submitted

The following is a objecting comment on application P162921/F by Nichola Geeson:

"

I would like to object to this proposal for Three Elms on the following grounds:

Traffic congestion on Kings Acre Road will increase:

It is already often difficult to turn right onto Kings Acre Road because of continuous streams of traffic. The extra traffic created by this proposal for far too many new homes will make the issue so much worse. A future western bypass would not alleviate this, since most of the people in the new households will undoubtedly need to access central Hereford more frequently than they would take any other journey direction.

Even if there are Park and Choose sites, people will only use those instead of their car if they can still reach their destination conveniently and in good time. That means providing buses at a minimum of 15 minute intervals throughout the day, which is a very costly undertaking. I am not convinced this is achievable. To walk into town from Three Elms takes 45 minutes, and few people would have the time or stamina for that and a return walk. A shared pedestrian/cycleway along Kings Acre Road to and beyond Whitecross would be a very helpful addition.

Too many road junctions:

Three proposed new junctions onto the A438 Kings Acre Road within such a short distance are far too many (entrance to this housing site, entrance to proposed Taylor Wimpey housing site to the west of Huntington Lane (current outline Planning Proposal P163345/O), potential entrance to Hereford Relief Road). Traffic on Kings Acre Road will be slowed, which will increase congestion. The excessive number and locations of proposed road/cycleway junctions on Roman Road and Three Elms Road are also questionable.

Flood risk will increase:

See Environment Agency, risk of surface water flooding close to Huntington Lane:

<http://tinyurl.com/jcperuu> (partly shown in FRA Drainage Strategy Report Part 1, EIRpt 84.pdf)

In the Hereford Times 13 October 2016 we read that Herefordshire Council has just approved flood alleviation measures costing £70,000 just south of Kings Acre Road from the Three Elms site to "mitigate flood risk to residents in Huntsman's drive and Fayre Oaks" Home Park "following the major flooding in 2014". If the Three Elms site changes from open fields to more sealed soils under homes and tarmac, similar surface water flooding close to Kings Acre Road is likely there too.

The flood risk map (in DesignAccess8-1.pdf) provided with the planning application is very misleading as it misses off risk of surface water flooding. It is not just land adjacent to Yazor Brook that may flood. The Environment Agency map (see <http://tinyurl.com/jcperuu>), showing risk of surface water flooding, demonstrates that significant potential effects in the areas close to the development site, especially just south of Kings Acre Road, have been ignored.

A map included in DesignAccess 4-1.pdf, shows how low-lying the affected area of Huntington and Kings Acre Road is within the wide valley of a former historic River Wye, and therefore it is at particular risk of flooding. In this wide valley of a former historic version of the River Wye, now partly followed by Yazor Brook, the water table is relatively high all year. The floodplain fields around Huntington absorb a lot of rainwater in winter that flows in to the valley from both the south and the north. Extensive building on these fields will seal the soils and prevent this absorption. New areas of surface water flooding are very likely.

None of the flood risk assessments model the likely increase in flood risk if the huge volumes of groundwater currently abstracted by Heineken and/or Cargill cease. See map of Abstraction Licences, in document EIARpt 79.pdf. . The water table may not have been high when test pits were dug, but if the current abstraction licences were to stop, the water table could become much higher. This planning proposal ought to include a further attenuation pond sited close to Kings Acre Road, as even with abstraction, based on events noted in recent winters there is likely to be increased flooding here.

Risk to quality of potable (drinking) water in the Groundwater Source Protection Zone:

As the EA note in their representation, part of the Three Elms site close to Kings Acre Road is also a specific groundwater Source Protection Zone. I am not convinced that this planning proposal can guarantee this important water source sufficient protection from pollution.

Environmental Assessment:

Document ES Volume 3 Non Technical Summary (EIARpt 99.pdf) seriously underplays the special local value of environmental assets and the extent of constraints. The conclusions on the extent of adverse effects from this development are actually only opinions, apparently mostly based on desktop assessments rather than personal knowledge of the area.

There are a number of significant trees that may be affected or lost due to this development, not least in the avenue of limes on Kings Acre Road. Herefordshire Council have very few TPOs listed for this area, so these trees (that surely should qualify for TPOs) do not have formal protection. The area is currently very rich in wildlife, as the surveys show, and the soil/agricultural land classification is Grade 1 and 2 which is exceptionally good, and rare nationally. It is very sad that these important assets are being dismissed so casually. A "green corridor" cannot prevent this proposal making the area urban rather than rural. Water voles, various types of bats, and many other local species are not likely to continue to flourish in an urban environment of increased noise, light, gaseous emissions, liquid pollution, litter, dog waste bags thrown into Yazor Brook, etc. No new bird boxes etc. will compensate for the special habitats lost. The rural heritage landscape setting of Huntington Lane and the very special conservation area of Huntington will be ruined.

I hope that these concerns will lead to reconsideration of this proposal.

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