

Planning application comment was submitted on the **03 April 2024 18:33 PM**

The following is a comment on application **P240468/F** by **Ron Brierly**

Nature of feedback: Objecting to the application

Comment: Please refer to the attached document.

Attachment:

Their contact details are as follows:

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Infrastructure from section 106 to consider: Upgrade of water treatment plant to address lack of phosphate permit

Link ID: https://www.herefordshire.gov.uk/info/200142/planning_services/planning_application_search/details?id=240468

Form reference: FS-Case-602456387

Planning Services.
Herefordshire Council,
PO Box 4,
Hereford, HR4 0XH

3rd April 2024

Planning Objection to Planning Application P240468/F.

Proposed residential development of 9 no. dwellings with associated access, parking and landscaping.

We wish to object **STRONGLY** to the proposed development of 9 houses on the land to the South East of Greyhound Close, Longtown.

Longtown Neighbourhood Plan

A considerable effort was made by residents of Longtown and the surrounding area to create and establish the neighbourhood development plan. This plan was approved by a neighbourhood planning referendum on the 30th January 2020 when 189 people voted in favour of it and only 23 against. The plan highlighted support for small infill developments of **2-4 houses** but virtually no support for large scale developments of the type proposed in this planning application. With particular regard to the development now proposed on the land to the SE of Greyhound Close, the neighbourhood plan stated that any properties should be of a **single-story** construction designed to suit the needs of older people and in order to **protect the view of Hatterall Hill**. The proposed development clearly fails to take this into account, all houses being 2 storey and of high density in a relatively small green field.

It is our understanding that Herefordshire has already exceeded its housing target for the period 2021 to 2026 which means that further developments such as the one proposed should be in accordance with our adopted neighbourhood plan. Longtown Parish has also successfully achieved its target level for new housing primarily through the infill developments favoured by local residents. There is consequently no need or justification for this development to take place, particularly as there is a considerable disconnect between it and the neighbourhood plan. Evidence for this is supported by the fact that there are 2 large, executive style houses for sale within the immediate vicinity of the development, one of which has been on the market for a considerable time. There are also 2 other houses on the market within the village one of which is coincidentally owned by the applicant [REDACTED]

Since the previous proposal by the applicant for 6 houses on the same site, an infill development of 2 houses on the opposite side of the road from the planned development, has been approved further lessening local demand for new housing.

Development Design

Longtown is primarily as the name suggests, a linear development along a single village road. Whilst there have been some deviations from this, with developments such as Greyhound Close and Roman Way, these developments have not resulted in a back-to-back layout of houses as is now being proposed by the applicant. Longtown would end up with a housing estate at the heart of our beautiful historic village, with houses not in keeping with older properties within the village.

It is our belief that the applicant is trying to squeeze far too many houses onto a relatively small green field plot. A previous application for 6 houses on the same site was rejected both by the local planning authority and by appeal. This over development could become worse as there is a high probability of prospective purchasers adding garages and extensions at a later date. In the climate change core strategy compliance statement, the applicant actually highlights this intention by indicating that bike storage is not needed as they can be kept in the garages which aren't shown on the plan.

Biodiversity Net Gain and Environment Issues

The applicant claims in the planning permission application that the site is exempt from Biodiversity Net Gain because of small site exemption. According to the government website this is only the case for developments that are of **9 houses or less and on an area of less than 0.5ha**. The development site is **0.57ha** and consequently needs to comply with the mandatory Biodiversity Net Gain regulation that came into effect on the 12th of February 2024. (The application was received by the planning office on the 17th of February 2024.)

There is consequently no doubt that the application should be rejected as it fails to comply with mandatory BNG regulation.

The planning design and access statement submitted by the applicant claims in section 4.7 that existing hedgerows along the site boundary will remain. This appears to be contradicted by the site layout which shows that the existing hedge between Greyhound Close and the development site has been removed.

The applicant is proposing that the site should be connected to the main sewer connection on land to the East of the site with the connection point being on land that is privately owned. In order to reach this, they will need to break through a hedge on the Eastern boundary of the development site. **The applicant's own ecological report mentions that this is a native species, rich hedge that is of local ecological importance and acknowledges that it is protected by the Hedgerows Regulations (1997).**

Longtown is very much a rural village with limited facilities and almost no opportunities for employment within the surrounding area. The type of houses being proposed appear to be aimed primarily at families who will need to travel a considerable distance to find work or worse still for people to purchase as holiday homes.

The development is proposed to take place on a green field site that was identified as being of medium suitability for development. No sites of high suitability exist within Longtown but sites do exist elsewhere in the county that are closer to places of employment. As an example, a new development of 38 houses is undergoing construction in Ewyas Harold, five miles from Longtown, (Planning Permission 141963) which is a far more suitable location due to its vastly superior road network and closeness to possible places of employment. We should be taking steps to reduce our carbon footprint not increase it by encouraging developments in remote locations from which residents will have to make longer journeys.

In their Climate Change Measures Compliance Checklist, the applicant claims that none of the renewable and low carbon energy options have been selected because of the historical/archaeological sensitivity of the location. We totally fail to comprehend why air source

heat pumps would be considered less appropriate than the alternative of oil-fired boilers and associated oil tanks.

Water Treatment and Supply

As we are no doubt all aware pollution levels are critical within the river Wye and it has become an issue of national concern and regional embarrassment. The Longtown water treatment works was constructed over 40 years ago when Longtown was a much smaller community. The population of Longtown has grown massively in the intervening years and this has resulted in a growing problem with the water treatment plant overflowing during periods of bad weather or high usage. When this happens, raw sewage is released directly into the Olchon Brook from where it flows into the river Monnow and subsequently the river Wye. This is now a frequent occurrence. Welsh water has started replacing some of the treatment works elsewhere including the one in Pontrilas but there are as far as we know no plans for replacing or upgrading the Longtown treatment works as the required funding simply isn't available. We are consequently left with an outdated treatment plant with a shortage of capacity and no phosphate stripping process. Allowing these 9 additional houses (**with their 27 additional toilets**) will consequently result in increased levels of raw sewage being released into our already threatened river system. This proposal should be rejected until the shortcomings with the treatment plant have been resolved.

It should also be noted that although the drainage engineer has raised no objection to the design, they appear to have been incorrectly advised that the applicant owns the land between the development plot and foul sewer connection point as can be seen from their statement below. This statement is incorrect as the connection point is on private land not owned by the applicant.

Access, adoption and maintenance		
If access or works to third party land is required, details of these works and agreement in principal with necessary landowners/consenting authorities to cross third party land and/or make a connection to the proposed watercourse/sewer	The Applicant has stated that they own the land between the development plot and the proposed foul sewer connection so no works on third party land are required.	✓
Confirmation of agreement in principle of proposed adoption	It is proposed that DCWW will adopt the foul sewer system. This should be confirmed at DOC stage.	✓



The issue is further compounded by the fact that the route proposed by the applicant to reach the main sewer connection point would mean breaking through the native species rich hedge on the Eastern boundary as mentioned earlier in this objection. As the applicant owns the land directly between the development and the Water Treatment facility it might be more ecologically sound for the applicant to lay a new sewer pipe across the land that they own if the development is to go ahead.

Welsh Water are well aware that there is an ongoing problem with low water pressure within the village, particularly impacting houses higher up the village. In the past they have objected to developments of this nature but now seem to be under the illusion that sufficient capacity exists. If so, then why are residents still experiencing frequent and severe supply issues? The proposed development should be rejected until this issue has been resolved as any increased demand will exacerbate the situation and would adversely affect the service to existing customers.

A proper consultation is needed between Welsh Water and local authorities in order to provide full transparency and to address the serious issues that exist with water supply and water treatment within the village.

Traffic and Roads

Proposed access for both construction traffic and future residents is via Greyhound Close. The close serves seven existing houses and is comparatively narrow and of paved block construction. The block paved road was built after the overall construction of the 7 houses in Greyhound Close, as the block paving design was unsuitable for use by heavy construction vehicles such as cement mixers, particularly whilst manoeuvring. Why the applicant now considers it a suitable access route for a major construction project is unfathomable? The road is rarely used by anything heavier than delivery vans but significant **road sinkage** particularly around drains is already taking place.

The road is the only access route for properties on Greyhound Close and utilities for these properties run beneath and alongside it. If this road is allowed to be the primary access route for this development, then it will suffer extensive damage. Damage could also be inflicted on the utilities running beneath the road. We are particularly concerned about our own property as the water supply, water meter and waste water outlet are all located within and beneath the area of pavement shown in the development plan as needing to be dropped at the entrance to Greyhound Close. These would need to be properly protected. Elsewhere on Greyhound Close areas of pavement have already sunk significantly implying that they are totally unsuitable for heavy vehicles to cross.



Entrance to Greyhound Close with our water meter cover circled in blue.

Limited parking on Greyhound Close means that residents and visitors resort to parking on the close. It is also a relatively safe haven for children who frequently use it for bike riding and play. (The village has no playground for children and a lack of pavement and traffic calming measures make play elsewhere in the village dangerous). This also makes it totally unsuitable as an access route for construction traffic and consequently the development should be rejected.

A proper survey of Greyhound Close is needed to determine its suitability as an access route to this proposed development site.

The existing roads connecting the village of Longtown to the nearest major road, the A465 are 4 to 5 miles in length, narrow and in places already suffering severe degradation. There are almost no places in which two large vehicles can pass. The narrow lanes are already struggling to cope with the combination of large farm machinery such as tractors with trailers and HGV vehicles delivering supplies to the area and the Clodock Water Factory in particular. The roads cannot cope with the additional construction traffic that this development would create and would struggle to cope with the additional traffic that the proposed development will generate, hence the proposed development should be rejected.

Visual Impact

Longtown is an historic village that is clearly visible from the Brecon Beacons National Park which, in addition to being a national park, is also a natural dark sky reserve. We need to ensure that developments should not impact on the spectacular views offered from the National Park and the Offa's Dyke path, nor serve as an extra source of light pollution. This was one of the reasons why smaller infill developments were preferred in the Longtown Neighbourhood Plan. An extra 9 houses added to an already overcrowded area could potentially mean **an extra 18 floodlights**. The proposed development of 9 two storey houses would be clearly visible from both the National Park and Offa's Dyke path and serve as a significant source of light pollution.

The Longtown Neighbourhood Plan did identify alternative sites for development which would be far less visible from the Offa's Dyke.

Conclusion

This is quite simply the wrong development in the wrong location. The application appears to be once again aimed at maximising profit for the applicant rather than satisfying the needs of the community.

If the applicant were to enter into a proper dialogue with representatives of the local community, then we are sure that a mutually beneficial plan could be put in place. The proposed layout is an over development on a relatively small site. The applicant has failed to comply with compulsory Biodiversity Net Gain regulation which applies to sites of over 0.5 hectares. Greyhound Close is totally unsuited as an access point for construction traffic. Both the outdated sewage treatment works and water supply are already at breaking point and an additional 9 houses will only make matters worse.

In light of all of this then we believe that this proposal should be rejected.

Ron Brierly and Anthea Roberts.

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