

Planning application comment was submitted on the **13 August 2024 22:11 PM**

The following is a comment on application **P222769/F** by **Alan Graham**

Nature of feedback: Objecting to the application

Comment: Dear Mr. Lewis,

I am writing to formally object to the proposed development at Breinton Lee, Hereford (Application Reference: P222769/F). My objection is based on the following material considerations:

1. Inadequate Flood Risk Management

The developer's latest flood risk assessments and amended plans highlight several concerns that have not been fully addressed. Despite the site's classification as Flood Zone 1, it remains highly susceptible to surface water flooding, particularly in the lower-lying eastern sections. The proposed drainage strategy involving infiltration basins and raised ground levels has not been sufficiently modeled to ensure its effectiveness. The Local Lead Flood Authority (LLFA) has raised concerns about the displacement of water due to the ground raising, questioning whether the proposed basins can adequately handle the additional runoff, especially during extreme weather events. This introduces significant uncertainty and potential risk to both the development and the surrounding areas.

2. Flawed Application of the Sequential Test

The developer's Sequential Test is fundamentally flawed due to its narrow scope, which was limited to the boundaries of Breinton Parish. National Planning Policy Guidance (NPPG) clearly states that the Sequential Test should be applied across the entire local planning authority area to identify the most suitable locations with the lowest flood risk. By restricting the test to Breinton, the developer has failed to consider alternative sites in Herefordshire that might be more appropriate and less vulnerable to flooding. This narrow application undermines the integrity of the Sequential Test and calls into question the suitability of the proposed development site.

3. Inadequate Consideration of Alternative Sites

The rejection of alternative sites, such as Cre06, is based on outdated and insufficient reasoning. The speed limit adjustments and other changes in local conditions were not adequately considered. Furthermore, the developer has not explored other potential sites across Herefordshire that could better accommodate the housing needs while minimizing flood risks and environmental impact. The failure to properly consider alternative locations demonstrates a lack of thoroughness in the site selection process, contrary to the requirements of national and local planning policies.

4. Over-reliance on Unproven Mitigation Strategies

The proposed mitigation strategies, such as the use of infiltration basins and the elevation of site levels, rely heavily on unproven assumptions rather than robust evidence. The LLFA has expressed concerns about the lack of detailed modeling to demonstrate how much water will be displaced and whether the proposed measures will effectively manage the flood risk. Without concrete evidence, these strategies remain speculative and introduce unnecessary risk to the development and its future residents.

5. Non-compliance with Herefordshire's Core Strategy and Housing Strategy

The proposed development does not align with several key policies in Herefordshire's Core Strategy and Housing Strategy. Policy SS7 emphasizes the need to account for physical and environmental constraints, such as flood risk, when identifying suitable development locations. Additionally, Policy SD3 requires sustainable water

management systems to be incorporated into new developments to mitigate flood risk. The developer's plans fall short of these requirements, failing to provide adequate solutions that meet the sustainability and flood risk management standards expected by the council.

6. Impacts on High-Quality Agricultural Land and Local Infrastructure

The proposed development is situated on high-quality agricultural land, which is a valuable and finite resource that should be preserved for agricultural use where possible. The Hereford Local Plan 2021-2041 highlights the importance of minimizing the impact on such land, particularly when alternatives exist. Additionally, the development will add significant strain to local infrastructure, including road networks and public services, which are already under pressure from existing and planned developments in the area. The developer's plans do not provide sufficient detail on how these additional demands will be addressed, further exacerbating the risks to the community.

Conclusion

The proposed development at Breinton Lee raises significant concerns regarding flood risk, site selection, environmental compliance, and the adequacy of local infrastructure. The planning application fails to align with Herefordshire Council's strategic priorities as outlined in the Core Strategy and Housing Strategy, and it does not meet the necessary standards for sustainable and responsible development.

For these reasons, I strongly urge the Council to reject this planning application. The developer should be required to undertake a more thorough and compliant assessment of alternative sites, ensure that the proposed homes meet all relevant environmental standards, and address the significant flood risks that have been inadequately mitigated in the current plans.

Yours sincerely,

Alan Graham
361 Kings Acre Road

Attachment:

Their contact details are as follows:

First name: Alan

Last name: Graham

Email: [REDACTED]

Postcode: HR40SL

Address: 361 Kings Acre Road, Hereford, HR4 0SL

Infrastructure from section 106 to consider: 1. Flood Mitigation Infrastructure

Enhanced Drainage Systems: The installation of advanced and well-maintained sustainable drainage systems (SuDS) to manage surface water runoff and prevent flooding in both the development site and surrounding areas.

Regular Maintenance and Monitoring: Funds should be allocated for the ongoing maintenance and regular inspection of drainage systems, infiltration basins, and any other flood mitigation infrastructure to ensure long-term effectiveness.

2. Road and Traffic Improvements

Traffic Management Measures: Given the existing congestion and safety concerns on Kings Acre Road, contributions should be directed towards road widening, improved signage, and the installation of traffic calming measures.

Pedestrian and Cyclist Safety: Infrastructure improvements such as new pedestrian crossings, dedicated cycle lanes, and better lighting along Kings Acre Road and surrounding areas to ensure the safety of residents and reduce the impact of increased traffic.

3. Public Transport Enhancements

Improved Bus Services: Investment in enhancing local public transport services, particularly bus routes, to reduce reliance on cars and accommodate the increased population resulting from the development.

Sustainable Transport Options: Contributions towards the creation of new walking and cycling paths that connect the development to key local amenities, schools, and the city center.

4. Educational Facilities

Expansion of Local Schools: Funding for the expansion of local primary and secondary schools to accommodate the influx of new students from the development.

Early Years Provision: Investment in nursery and early years education facilities to support young families moving into the area.

5. Healthcare Services

GP and Healthcare Facilities: Contributions towards the expansion or construction of local GP practices and healthcare facilities to meet the increased demand for medical services.

Emergency Services: Investment in improving local emergency services, such as ambulance response times, to ensure the safety and well-being of all residents.

6. Environmental and Green Space Enhancements

Community Green Spaces: Creation and maintenance of public green spaces, including parks, playgrounds, and recreational areas, to improve the quality of life for residents.

Biodiversity Initiatives: Contributions towards local biodiversity projects, including tree planting, habitat restoration, and the protection of existing natural features, to enhance the environmental sustainability of the area.

7. Waste and Utilities Infrastructure

Upgraded Waste Management Facilities: Investment in waste collection, recycling, and disposal infrastructure to manage the increased waste generated by the development.

Utility Improvements: Upgrades to local water, sewage, and energy supply networks to ensure they can handle the additional demand without compromising service quality.

These contributions should be carefully considered and clearly outlined in the Section 106 agreement to ensure that the development has a positive and sustainable impact on the local community and infrastructure.

Link ID: https://www.herefordshire.gov.uk/info/200142/planning_services/planning_application_search/details?id=222769

Form reference: FS-Case-638455237