



APPLICATION No(s): **P233134/F**

ADDRESS: [Hereford, Central, Land off Green Street Hereford HR1 2RB](#)

PROJECT: *Proposed two purpose built transformer housing (standard GRP green glass fibre polyester resin housing) each sat on concrete plinths for flood protection. With substations installed inside each housing to supply electricity to Welsh Water, Local residents and Businesses. Each glass fibre polyester resin housing is: width 3300mm, Depth 2400, Height 2270 to be mounted on 600mm concrete base. To be positioned side by side doors to face south into the meadow*

APPLICANT: Mr Wesley Gammond, National Grid

DATE: 11<sup>th</sup> February, 2024

NATURE OF FEEDBACK: **Objection**

#### **HEREFORD CIVIC SOCIETY COMMENTS:**

The application is for two large transformer units proposed to be sited within the Bartonsham Meadows, a site largely managed as a Nature Reserve by Herefordshire Wildlife Trust for conservation, biodiversity, carbon sequestration, flood alleviation and public benefit. With considerable support from the local community and the Friends of Bartonsham Meadows, HWT has embarked upon a programme of restoration to traditionally managed, ecologically diverse, flood plain meadow at this site.

We understand that submission of an application for the proposed scheme was not discussed with the Wildlife Trust or the local community and it is clear there has been no pre-application consultation with planning officers either. The scheme is fundamentally at odds with the objectives of the Friends and the Wildlife Trust discussed and agreed with the Church Commissioners, as landowners, over the past four years.

That being so we would expect to see supporting documents seeking to address the impacts on biodiversity, carbon sequestration, flood alleviation and public benefit which may reasonably be anticipated from the construction of the housings on their concrete basis within a compound excluded from grazing or public access. These and other documents assessing the impact upon heritage, upon setting and views, and upon public health are all missing from the application. Also missing is a site options assessment – there is no evidence here that other sites have been considered. Finally there is no landscaping plan – no attempt has been made to mitigate the impact of the units aesthetically, perhaps with a planting scheme.

We consider that these two transformer units, sited as they would be, on the very edge of the Conservation Area, at a prominent location where Green Street meets the Meadows, fail to *'demonstrate that character of the landscape and townscape has positively influenced the design, scale, nature and site selection, protection and enhancement of the setting of settlements and designated areas'* and is therefore contrary to Local Plan Core Strategy **Policy LD1**

We also consider that the scheme fails to *'create safe, sustainable, well integrated environments for all members of the community'* and is therefore contrary to **Policy SD1**. Policy SD1 expects new buildings to be *'designed to maintain local distinctiveness through incorporating local architectural detailing and materials and respecting scale, height, proportions and massing'*. The units, with their concrete bases would both be almost ten feet high, nearly eleven feet wide and eight feet deep and

would be entirely out of scale with their surroundings particularly the 4' x 3' 6" pedestrian gate immediately alongside.

In terms of public health, given the transformer units are proposed to be sited immediately adjacent to a popular public footpath, we would expect to see an electromagnetic field (EMF) assessment to ascertain EMF radiation readings in the immediate locality. The results of this assessment, together with details of any remedial measures (such as EMF shielding) to be undertaken to ensure that EMF levels fall within the agreed levels published in the ICNIRP Guidelines, and thereby avoid detrimental effects on human health, in accordance with **Policy SD1** of the Herefordshire Local Plan – Core Strategy and paragraph 185 of the National Planning Policy Framework.

In general terms the location, contiguous (if not actually within) to the Conservation Area would, in our view, fail to meet the statutory duties set out in Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, as amended, contrary also to policies **LD4 and SS6** of the Herefordshire Local Plan – Core Strategy which relate to the protection of heritage assets and local distinctiveness, and Section 16 of the National Planning Policy Framework (2021), with regards to conserving and enhancing the historic environment. In taking the paragraph 202 test of the NPPF, the less than substantial harm identified is not considered to be outweighed by any public benefits; at least the applicant is unable to demonstrate that any such benefits cannot be met by other, less sensitive sites.

Although not strictly a planning consideration, the siting of the units would, so we are informed, gravely limit access to the site for agricultural operations as it is proposed to reduce the access for machinery to a gateway opening less than ten feet wide (double gates each 4' 6"). We understand that the Wildlife Trust is taking this matter up separately with the applicant.

Yours sincerely

Jeremy Milln FSA

43 Villa Street, Hereford, HR2 7AU [REDACTED]

for and on behalf of Hereford Civic Society

HEREFORD CIVIC SOCIETY DISCLAIMER: Comments submitted in respect of planning permission or listed building consent applications to Herefordshire Council will have been drafted by HCS caseworkers to reflect the generality of view of the Society and do not necessarily reflect the views of all members.

