

Planning application comment was submitted on the **08 April 2024 13:45 PM**

The following is a comment on application **P240422/F** by **Richard Price**

Nature of feedback: Objecting to the application

Comment: I would like to object to this application for the reasons stated on the attached document.

Attachment:

Their contact details are as follows:

First name: Richard

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Infrastructure from section 106 to consider: None

Link ID: https://www.herefordshire.gov.uk/info/200142/planning_services/planning_application_search/details?id=240422

Form reference: FS-Case-603838306

Objections to Planning Application P240422/F

Dear Sir or Madam,

I am writing to object to the above planning application on the following grounds:

1. **Visual impact.** The land on which this development is proposed rises from the flat meadow land of the Lugg valley and is highly visible to all approaching Hereford on the A438 from the east, as well as from the high ground in the area of Bartestree, Dormington and Priors Frome. As things stand the previous housing development has already impaired the view from this direction. This development will further destroy the impression gained of Hereford being a city set in the countryside. It will transform what is still an attractive approach into just another insensitively and over-developed city boundary. Those who seek physical evidence of how insensitive new housing developments approved by Herefordshire council can be need only look at the developments around the south of Ledbury, and along Roman Road in Hereford, both remarkable for their intrusion into their surroundings.
2. **Disturbance of, and damage to, the Lugg Meadows SSSI.** The provision of 350 houses adjacent to a sensitive area of great importance in wildlife terms can only result in increased disturbance by people and their pets. 350 houses probably equates to a population increase of 1000-1200 people as a minimum. If 15% of these households own dogs, for example, this might result in another 50 dogs being walked twice a day in that area. The impact upon ground nesting birds such as curlew and skylarks, which are already under threat in Herefordshire, can be imagined. Furthermore, not all dog walkers remove dog faeces so the faecal load on the meadows will be substantially increased to the detriment of it's nutrient balance. Cats are of course an even more serious threat to ground nesting birds and a similar increase in the population of cats as of dogs is to be expected, and cats show a marked reluctance to dispose of their faeces responsibly. Dog and cat urine is nitrate rich and will increase nitrate loadings on the meadows with adverse effects on the existing ecological balance. Can those consultants who have examined the impact of this scheme upon the local environment say that they have factored these impacts into their assessments ? If so, they should make those assessments and calculations available to both the public and planning authorities. Were models of disturbance and pollution from pedestrian/ pet visits developed and assessed prior to this application being made?
3. **Doubtful decision that an Environmental Impact Assessment (EIA) is not needed.** The very brief screening opinion of Herefordshire Planning is reproduced below as Appendix 1. It would seem that there is a strong desire to wave this development through without considering the deeper implications. Why ? To further highlight the blithe assertion that no EIA is necessary the regulations concerning EIAs are quoted in Appendix 2 with the relevant clauses in bold type. Is it seriously asserted that the view of the planning department that there is no need for an EIA would withstand judicial review, when no

evidence has been produced in support of the council's view regarding clauses 2 b) ii), 2 c) and 2 d) ?

4. **Inconsistency with Herefordshire Council's stated respect for the environment and 'Zero Carbon and Nature Rich' policies.** The construction of 350 houses will use as a minimum around 30,000 cubic yards of concrete. Each cubic yard of concrete causes about 400lbs of CO2 to be released. This development will therefore release, excluding roads, utilities etc., around 5,000 tons of CO2. It is difficult to believe that Herefordshire Council are serious about any Zero Carbon initiative when their notable enthusiasm for construction anywhere in the county completely ignores the carbon impact of construction.
5. **Impact of increased traffic on an already notable choke point on a major arterial road.** The A438 is already a busy road and is notably so during term time at the times of the 'school run'. Even if no school is built immediately there will be an increased traffic flow at the proposed access point to this estate onto the A438. Motorists will either be faced with long delays (with consequent increase in pollution) as they await a gap in the traffic or traffic lights/ a roundabout will have to be installed which will impede the existing traffic flow at this point. This will have knock-on effects on congestion in Lugwardine and, particularly, near the Cock of Tupsley pub where traffic at peak times for school travel leads to severe congestion and scope for accidents.
6. **Light and noise pollution.** While the consultants, naturally, show in their assessments a benign impact upon light pollution of this development they cannot know what the impact of vehicle lights and noise will have upon the Lugg Meadows nature reserve. The lower part of this development will be very close to the SSSI and cars driving downwards (towards the A438) will at night have headlight beams directed towards the Lugg Meadows. Furthermore, given the fashion for some people to have passive infra red triggered high intensity security lights outside their homes there will be intermittent light pollution from this source through the hours of darkness. This source of light pollution is not controllable by either the developers or the council.
7. **Inadequate assessment of drainage impact.** This site is mainly on ground sloping towards the east i.e. towards the Lugg valley. The provision of swales and storage ponds look very inadequate given the speed with which run-off occurs during heavy rainfall. Given that modern housing estates are mainly composed of hard, impervious surfaces the speed of storm water run off is increased. What modelling of rainfall and drainage capacity has been conducted to justify the proposed drainage provision? In the statistical modelling which has, presumably, been conducted how often is the drainage system proposed likely to be overwhelmed and roads (not least the A438) flooded, especially when the Lugg itself overflows its banks ? Or hasn't any statistical modelling of such events been done at all?
8. **Incompatibility with the objective of Herefordshire Council to conserve it's heritage.** This development appears to contradict the council's own local plan which states that :

Housing proposals will be permitted where the following criteria are met:

Their design and layout should reflect the size, role and function of each settlement and be located within or adjacent to the main built up areaproposals will be expected to demonstrate particular attention to the form, layout, character and setting of the site

and its location in that settlement and/or they result in development that contributes to or is essential to the social well-being of the settlement concerned;

It is submitted that this development is not in accordance with this objective.

9. **Irrevocable nature of the development.** If this development is permitted it will change forever the eastern approaches to Hereford, damage the Lugg Meadows SSSI and act as a Trojan horse for further development in this most sensitive location. Development, if we must build further houses, should be concentrated on better screened and less prominent locations, and certainly not adjacent to nationally important SSSIs.

Appendix 1: Screening opinion of the Local Planning Authority

The proposed development has been considered against the selection criteria in Schedule 3 of the 2017 Regulations and also to advice contained in Planning Practice Guidance on Environmental Impact Assessment. It is not considered that the proposed development would be likely to have significant effects on the environment by virtue of factors such as its nature, size or location. Therefore under Regulation 6 of the 2017 EIA Regulations, Herefordshire Council hereby adopts the Screening Opinion that the proposed development is not EIA development and that **Environmental Impact Assessment is not required.**

Accordingly, based on the assessment above, the Local Planning Authority is of the view that significant environmental effects are unlikely to arise and hence adopt the opinion that the development proposed is not EIA development as defined in the 2017 Regulations. The decision is based on the information known at the time and selection criteria for screening Schedule 2 development (Schedule 3) Planning Practice Guidance (Environmental Impact Assessment).

Appendix 2: (Extract from Town and Country Planning (Environmental Impact Assessment) Regulations 2017) Section 6

(2) A person making a request for a screening opinion in relation to development where an application for planning permission has been or is proposed to be submitted must provide the following—

(a) a plan sufficient to identify the land;

(b) a description of the development, including in particular—

(i) a description of the physical characteristics of the development and, where relevant, of demolition works;

(ii) a description of the location of the development, with particular regard to the environmental sensitivity of geographical areas likely to be affected;

(c) a description of the aspects of the environment likely to be significantly affected by the development;

(d) to the extent the information is available, a description of any likely significant effects of the proposed development on the environment resulting from

(i) the expected residues and emissions and the production of waste, where relevant; and

(ii) the use of natural resources, in particular soil, land, water and biodiversity