

From: Mick Murphy <[REDACTED]>
Sent: 17 April 2024 21:42
To: Planning Enquiries <planning_enquiries@herefordshire.gov.uk>
Subject: Application 240422 - Land to the east of Hereford South of Ledbury Road (A438) Hereford

Attention: Ollie James

I endorse all the points raised by Herefordshire Wildlife Trust, in their submission and objection, and that of RSPB England.

Any development in the vicinity of a SSSI is contentious, and this application is for a large housing development. A housing development of this magnitude would present a permanent, continuous threat to the fragile environment of this unique and, ever increasingly rare, wildlife habitat. No amount of ameliorating features, built into the overall development will obviate the damaging effects of a large settlement; located so close to a pristine wildlife habitat - and especially one that is important enough to be designated a Site of Special Scientific Interest.

Large concentrations of people come with a wide variety of domestic effects, which become 'refuse', when no longer required and then discarded. Such 'refuse' is not always disposed of in a responsible and environmentally acceptable manner and can end up becoming non-biodegradable litter and general detritus. This will inevitably find its way onto the Lugg Meadows and impact its special environment.

Increasing numbers of household pets, attendant upon all domestic settings, will pose an ever growing threat to wildlife in the surrounding area. It would be impossible to curb the roaming instincts of a growing population of cats, from invading the conservation area and preying on ground nesting birds and other wildlife.

Noise and air pollution from hundreds of fossil fuelled vehicles will also have a damaging impact on The Lugg Meadows.

Drainage - Surface Water and Foul Water disposal.

It seems 'Dwr Cymru' has poured 'cold water' on any acceptable proposal for disposing of foul water: 'We have considered the impact of foul flows generated by the proposed development and concluded it is unlikely that sufficient capacity exists to accommodate the development without causing detriment to existing services we provide to our customers, or in regard to protection of the environment.'

This is a very serious admission from Welsh Water. This suggests the proposed development is unsustainable, which should indicate an automatic 'refusal.' It does not surprise me that Herefordshire Council are still having difficulties with lifting the restrictions on development in the heavily polluted Lugg area, and in spite of their gallant efforts to mitigate ever growing volumes of phosphate from entering the Wye/Lugg Catchment. The Wye is considered 'unfavourable and declining' according to Natural England's latest appraisal (September 2023) - and this despite the increased investment, over the last few years, into expanding the capacity of treatment plants, with ever more ingenious methods for stripping foul water of pollutants.

In the case of the Eign WwTw, which is located within the City, it is more than likely, there is little room for infrastructure improvements. Such improvements would be undertaken at 'point source' - within the confines of the treatment works. If there's no room for expansion, then capacity remains restricted.

Surface Water

The Applicant's drainage consultant has proposed a SuDS system to deal with attenuation of and disposal of surface water. This would involve the filtration of surface water to ground, with exceedence flows to a water course nearby. Filtration tests were carried out in the NE sector of the site, where the soil engineers found evidence of porosity. Though the tests proved successful, there was no indication in the report that any tests were carried out to assess variable groundwater levels. Given this proposed development is sited on a floodplain, it seems likely that variable groundwater levels will impact the SuDS system, rendering it ineffectual, especially in the winter months.

Ground tests for SuDS should be carried out in accordance with the BRE(Digest)365 methodology which includes a standard test for evidence of a high water table.

In the SuDS Handbook, which is an advisory booklet to help developers comply with the requirements of the Core Strategy policies on surface water(SD3) and foul water(SD4) it states, 'The Handbook provides a benchmark defining the standards that need to be met to discharge planning conditions.'

Under the heading: Planning Approval for soakaways in paragraph 4 it states, 'To obtain planning approval for surface water soakaways, testing in accordance with BRE(Digest)365 is required.'

In section 6.7 of the Handbook, under the heading 'Groundwater Levels' it states, 'Where unlined storage and conveyance features are proposed, the depth of the groundwater also needs to be determined. The groundwater needs to be a minimum of 1m below the invert of any incoming pipework to ensure that the performance of the drainage system is not compromised.'

Groundwater levels need to be assessed when testing for SuDS systems, especially in the location of this proposed development. When considering the foregoing, it is obvious to me that without evidence showing a low probability of groundwater interference with the viability of the SuDS system, Planning would have to withhold approval.

Mains Water

Welsh Water is casting doubt about mains water supply, 'The water supply system in the immediate vicinity has insufficient capacity to serve the development and will cause detriment to existing customers water supply.'

This is another serious admission from the supplier of a vital resource, and more irrefutable evidence of the unsustainability of the proposed development.

Conclusion

I strongly urge the Case Officer to allow 'further comment' submissions in order to allow scrutiny and commentary on the, yet to be published, Land Drainage Engineer report and that of HC's Ecologist. Natural England cannot offer comments without a HRA report from Ecology. Both these reports should be on the planning website for appraisal by the many objectors, who feel very deeply about this application and the potential it has for harming a much treasured wildlife habitat and SSSI.

I object to this application

Michael Murphy
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