

# ENVIRONMENTAL IMPACT ASSESSMENT STATEMENT OF CONFORMITY

Land to the south of Lower Bullingham, west of the Rotherwas Industrial Estate, Hereford, HR2 6JW

Planning Application Reference P242558/O

## Introduction

This Environmental Impact Assessment (EIA) Statement of Conformity has been prepared by Ridge and Partners, with input from the Environmental Statement (ES) technical chapter authors, in relation to an outline planning application at land to the south of Lower Bullingham, west of the Rotherwas Industrial Estate, Hereford, HR2 6JW ('the site'), submitted under planning application reference P242558/O on 3<sup>rd</sup> October 2024.

The description of the 'Proposed Development' is as follows:

*"The first phase of an urban extension (known as the Southern Urban Expansion in the Herefordshire Local Plan Core Strategy) comprising up to 540 homes (Use Class C3); employment land (Use Class B and E), local centre and a country park together with supporting public open space, and all other associated works (e.g. demolition of existing industrial buildings, drainage, landscaping and ground modelling). All matters are reserved for future consideration save for 'access'. Only the means of access into the site is sought as part of this outline application, not the internal site access arrangements."*

The application was supported by an ES which was produced in line with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) and assessed whether there would be any likely significant effects as a result of the Proposed Development.

This Statement of Conformity is now submitted in response to queries regarding the absence of the approved Southern Link Road ('SLR') scheme (now termed the Hereford Bypass Phase 1) within the list of potential cumulative schemes considered in the ES, as well as a query regarding the time lapse between ES baseline studies and the submission of the ES and the Lower Bullingham Phase 1 planning application.

Overall, this Statement confirms that the operational and construction effects arising from the SLR proposal are non-material in the context of the ES and do not alter the results or conclusions previously reached. It also confirms that the time elapsed since the ES baseline studies does not result in any changes to the results and conclusions reached in the ES. Further detail in response to the points raised is provided under the headings below.

## Consideration of Cumulative Effects of the SLR Scheme

### Transport

#### Operational Effects

A list of development and transport infrastructure schemes to consider cumulative effects was agreed as part of the formal EIA and Transport Assessment Scoping process. As part of this, it was agreed with Officers that this should not include the SLR as there was not a firm commitment from the Council for this scheme proceeding within the time horizon of the modelling assessment years considered at the time the modelling was undertaken, in line with guidance set out in the DfT's WebTAG. This set of assumptions was

subsequently coded into the modelling (both SATURN – strategic modelling and the VISSIM – microsimulation modelling).

Notwithstanding this, based on a review of the available information, the SLR scheme, once fully operational, is anticipated to improve network operation and capacity within the area, particularly along the A49 corridor and junctions which intersect with this corridor.

Consequently, the assessment of transport and movement related environmental effects presented within the ES, which does not assume delivery of the southern link road scheme, represents a robust scenario. Accordingly, no materially different conclusions on likely significant effects during the operational phase are anticipated.

### Construction Effects

The current programme is for construction of the first phase of the Bypass, namely the SLR to be commenced in December 2026. Completion would likely be some time after this.

We understand the second phase, which provides the onward western Bypass, to include completely bypassing the current A49 river crossing, will be subject to further technical and engineering analysis. It is not due for commencement for some time (a timescale for future delivery is not yet specified).

There could be overlap during the construction activities of the Phase 1 Lower Bullingham development and the southern link road. Construction of the second phase of the Bypass is likely to occur well outside of the time horizons assessed within the Lower Bullingham Phase 1 ES.

A high-level estimate using the methodology in the TRICS Construction Traffic Research Report (JMP, 2008) has been undertaken to quantify the number of movements during construction associated with the Phase 1 Lower Bullingham development. This estimates, at peak construction activity, there could be 35 two-way construction vehicle movements per day. The Transport Assessment prepared for the southern link road forecasts up to approximately 100 two-way vehicle movements per day at peak construction of this infrastructure scheme. The respective Construction Traffic Management Plans would control these movements to reduce impacts on the network during the peak periods and restrict movements to key corridors such as the A49 and B4399 (Rotherwas Relief Road), as far as reasonably practicable.

For context, background traffic flows on the A49 and B4399 are in the order of 13,000 and 4,000 two-way daily vehicles. The cumulative movements forecast during construction of the southern link road and Phase 1 Lower Bullingham development, even during the peak construction period, represents only a small proportion of vehicles on the network, (<1% on the A49 and 3% on the B4399). Accordingly, no materially different conclusions on likely significant effects during the construction phase are anticipated.

### Conclusion

Overall, the conclusions of the ES chapter are therefore deemed to be robust with the inclusion of the southern link road only improving conditions on the local network from an operational perspective.

## Consideration of the time lapse between ES baseline studies and ES submission

### **Ecology**

With regard to ecology baseline surveys, the site has been subjected to an extensive suite of ecological survey work undertaken between 2016 and 2023.

It is considered that the ecological baseline information presented within the ES remains sufficiently robust and up to date to inform the determination of the application.

The site comprises predominantly low-distinctiveness habitats. Based upon the illustrative proposals, which include a Country Park, the proposed development would deliver a significant Biodiversity Net Gain.

Given it is an outline planning application, the ecological constraints have been identified at this stage, the arable habitats are unlikely to have significantly changed, and the scheme would deliver a package of meaningful enhancements for protected species, it is acceptable that, Draft Condition 16 requires an updated ecological assessment/walkover no more than 3 months prior to commencement of development within any phase and the submission of updated results and reports, where required by the updated assessment and walkover.

## **Landscape**

With regard to the landscape and visual baseline, there is no specific guidance on how frequently baseline studies must be updated for landscape and visual impact assessment. GLVIA3 and the statement of clarification don't refer to this, and it is therefore considered to be a matter for professional judgement.

The ES viewpoints were undertaken in December 2023, within one year of the application submission, which is considered a standard timeframe. Further, in this instance the planning policy, landscape character and green infrastructure publications referred to within the baseline have not changed since the ES chapter was prepared, nor have the relevant identified landscape-related designations. The visual baseline is also not expected to have changed to any notable extent that would alter the basis for the assessment.

Accordingly, the LVIA work remains robust, and the conclusions of the ES chapter remain valid and unchanged.

## **Conclusion**

As above, it is concluded that the SLR scheme will have no material bearing upon the results and conclusions of the Transport ES Chapter, with the inclusion of the SLR only improving conditions on the local network from an operational perspective. Therefore, the EIA remains valid in this respect.

Furthermore, it is considered that the environmental information reported within the ES remains sufficiently current and robust to inform determination of the application and that no material changes have occurred which would alter the conclusions of the ES.