Planning application comment was submitted on the 16 April 2024 10:25 AM

The following is a comment on application P240422/F by Stuart Hedley

Nature of feedback: Objecting to the application

Comment: I wish to object to the proposal as it will irreversibly damage a site of national importance for wildlife, a SSSI.

The proposal will damage it through the effects of significantly increased visitor numbers brought about by 250 permanent homes immediately adjacent to the site. This happens through cumulative trampling, disturbance of wildlife especially birds, and through the irreversible pollution that occurs through dog faeces, urine and litter. Trampling increases ground compaction and faeces and urine are powerful fertilisers, all three of which change vegetation permanently by converting old, rich and rare plant communities into widespread and common ones. On many former meadows close to centres of population the essential, traditional practise of haymaking is becoming untenable through contamination of the hay crop through dog mess.

Through my nearly forty years of working throughout Britain on SSSI and in plant ecology I know these effects are certain, and mean the LPA must reject the application if it is not to be in breach of its duties under s40 of the Natural Environment and Rural Communities (NERC) Act 2006.

The current state of the SSSI is published as 'unfavourable declining', reflecting existing pressure from floodwaters with increased nutrient content as a result of intensive farming in the catchment. There are many working hard, using both public and charitable money, to turn this situation around and restore this historic meadow which forms a unique and proud backdrop to the City of Hereford. The proposal imposes an additional intolerable extra burden which will only see the site decline further.

The SSSI is designated for its lowland meadow community, and supports a nationally rare vegetation type. Amongst the constituent species are those in the table below:

National threat level National rarity measure Status in Herefordshire* Myosurus minimus Mousetail VU Rare Oenanthe silaifolia Narrow-leaved Water-dropwort Nationally Scarce Scarce Potamogeton lucens Shining Pondweed Rare Sanguisorba officinalis Great Burnet See note below Thalictrum flavum Common Meadow-Rue

*Smith, I., Garner, P.G. & Jannink, M (2019) The Rare Plants of Herefordshire

Note Great Burnet and Common Meadow-rue are effectively highly threatened in Herefordshire and an updated and more thorough assessment than that in the above-listed publication would make them high priorities for action.

Stuart Hedley, Vowchurch County Plant Recorder (Herefordshire)

Attachment:

Their contact details are as follows:

First name: Stuart

Last name: Hedley

Email:

Postcode: HR2 0RL

Address: Slate House, Vowchurch, HR2 0RL

Infrastructure from section 106 to consider: I do not consider any infrastructure provision would resolve the threat posed to the site by the proposal, which is the impracticality and unenforceableness of managing greatly increased human and dog visitor pressure.

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

Form reference: FS-Case-606234301



Excerpt from a study by the objector from a common in Bedfordshire showing how high value plant communities (two shades of orange) are converted into low-value plant communities (pale yellow / yellow) through trampling and enrichment by dog faeces and urine along habitually used paths. The proportion of the site so affected is large.