

Planning application comment was submitted on the **17 April 2024 14:21 PM**

The following is a comment on application **P240422/F** by **Save the Wye Tyler**

**Nature of feedback: Objecting to the application**

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**Comment:** This objection is on behalf of Save the Wye - a voluntary environmental group represented on the Nutrient Management Board and Wye Catchment Partnership.

**Attachment:**

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Their contact details are as follows:

**First name:** Save the Wye

**Last name:** Tyler

**Email:** [REDACTED]

**Postcode:** HR1 1NJ

**Address:** 59 Mount Crescent, Hereford, HR1 1NJ

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**Infrastructure from section 106 to consider:** In the unfortunate event of the Council being minded to approve this application, there should be very substantial provision for Section 106 contributions to protect the SSSI/SAC as well as on-site ecological enhancements. We do not believe these would be sufficient to overcome our objections but they would at least lessen the impacts.

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Link ID: [https://www.herefordshire.gov.uk/info/200142/planning\\_services/planning\\_application\\_search/details?id=240422](https://www.herefordshire.gov.uk/info/200142/planning_services/planning_application_search/details?id=240422)

Form reference: FS-Case-606742822

59 Mount Crescent

Hereford

HR1 1NJ

17<sup>th</sup> April 2024

Dear Sir/Madam

**Planning Application P240422/F**

**Land to the East of Hereford South of Ledbury Road (A438) Hereford**

I am writing on behalf of the Save the Wye group to OBJECT to this application. This is in addition to the objection I have made personally.

Save the Wye is a voluntary environmental group concerned about the decline of the River Wye and its catchment, clearly including the River Lugg. This decline has been driven primarily by diffuse agricultural pollution exacerbated by the amount of manure produced by the chicken growing industry. However housing also produces negative environmental impacts, some of which is due to additional nutrient enrichment but others of which relate to the impacts of people and their lifestyles on sensitive wildlife habitats.

This proposal will have both nutrient enrichment and lifestyle impacts on the Lugg Meadows SSSI and River Lugg SAC, both of which are already in decline.

Our objection is based on the following grounds:

- We note that Dwr Cymru/Welsh Water has indicated that this development would place unmanageable pressure on both water supply and waste water treatment infrastructure and for this reason alone this application should be refused. The main stem of the Wye is right on the border of acceptable phosphate levels at best and low flows in the summer are already seriously endangering the SAC's wildlife. This is not the time to be putting further pressure on that ecosystem.
- As I noted in my own submission, the application site comes right up to the SSSI boundary making cross boundary impacts extremely likely. These impacts include:
  - Disturbance by cats and dogs - as a ground nesting species curlew particularly are vulnerable to predators as are other birds. There is no such thing as a barrier that would keep this disturbance at bay in perpetuity. Cats are a particular concern.
  - Disturbance by humans. Even though there are legal restrictions to prevent damaging access and these are explained in signs and by wardens, people frequently break these rules and walk on the Lower Meadows. With more people, even closer geographically, this will be increasingly difficult to control and further damage to bird and plant populations is extremely likely.

- Noise impacts from the housing and other development on breeding birds, particularly curlew
- Diffuse pollution from surface water runoff and ground water via SUDS (which does not remove pollutants to any great degree) will undoubtedly include phosphates and nitrates - both known to be causing significant impacts on the rivers. This is a serious issue and is likely only to add to the decline of the meadows and the river. The applicant needs to prove nutrient neutrality in this regard.
- Surface runoff from the site (given much of it is on relatively steep ground) as well as pollution of the will enhance peak flows into the Lugg Rhea no matter how much SUDS are invested in.
- The development would increase human activity in this general area leading to:
  - Enhanced traffic flows on what is already a busy local road network (especially the main road) with the concomitant increase in noise, air and water pollution with direct impacts on SSSI and SAC features
  - Even greater access to the Upper Lugg Meadows which already suffers from huge levels of recreational pressure, particularly from dog walking, leading to significant damage from the associated disturbance and fouling
- The development is sited partially on the floodplain. Floods are becoming more frequent as was evidenced in recent months. It has become clear that we need to protect our floodplains as part of Natural Flood Management and even non-housing uses of this land will reduce its potential to contribute to the health of the river. The potential school and shop will directly impact on flood storage capacity.
- In itself, this land has value as a wildlife habitat supplemental to the SSSI/SAC. The value of buffer land between development and protected sites is now well established.
- The site is not proposed for development in the Council's Core Strategy. There should therefore be a presumption against development, particularly in view of the significant and negative wildlife impacts - preventing which is an important objective of the Strategy.

In the unfortunate event of the Council being minded to approve this application, there should be very substantial provision for Section 106 contributions to protect the SSSI/SAC as well as on-site ecological enhancements. We do not believe these would be sufficient to overcome our objections but they would at least lessen the impacts.

I call on the Council to reject this proposal without delay.

Yours faithfully

*Richard Tyler*

for Save the Wye