

Planning application comment was submitted on the **17 April 2024 15:33 PM**

The following is a comment on application **P240422/F** by **Joanna Henshaw**

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

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**Comment:** I object to this application NOT because I do not realise how urgently we need to build more housing stock, but because:

1. The Lugg and Hampton Meadow SSSI (Site of Special Scientific Interest) lies directly adjacent to the proposed development site, and I have substantial worries about the impact on both the biodiversity and the water meadow landscape of both the building process and the subsequent proximity of 350 households;

2. As well as their scientific importance, these meadows have huge significance historically and culturally, being rare 'Lammas Meadows' whose hay-sales enabled rebuilding of the Cathedral in the 11th and 12th centuries;

3. Among other concerns, there are significant worries over how the developers propose to deal with surface water run-off and land drainage on a site that is adjacent to land that regularly floods for weeks at a time, leaving the ground saturated and unable to receive year-round the 'infiltration to ground' from the housing development that is mentioned in the planning proposal;

4. There are other sites that are less sensitive, less significant, and less controversial that could be used for housing development.

1. From a scientific and wildlife diversity viewpoint, and extracting from the Herefordshire Wildlife Trust's website:

Lowland meadows, such as the Lugg and Hampton Meadow, are a priority habitat in the UK Biodiversity Action Plan, meaning that they are of prime importance to the conservation of biodiversity in England.

The SSSI Notification for the Lugg and Hampton Meadows was issued on 14th December 2011 because of the following nationally important features:-

a. Species-rich neutral grassland: The SSSI supports a large expanse of traditionally managed Lammas Hay meadows with species-rich neutral grassland. The Herefordshire Wildlife Trust provides a list of the principal wildlife that flourishes here and that will be endangered by the proximity of the new housing development.

b. Vascular plants: This SSSI supports a large population of the nationally scarce wildlife species listed as 'vulnerable' in the vascular plant Red List for Great Britain and rare in Herefordshire.

c. Breeding curlew are also mentioned in the SSSI citation. They breed on Lower Lugg Meadow and on land adjacent to Upper Lugg Meadow. Their nests are vulnerable at the best of times, and the increased footfall of new residents on the meadows, and the natural hunting instinct of pet cats, is likely to disturb the curlew population and discourage them from nesting.

In addition to this, the entire length of the River Lugg - mere walking distance from the edge of the proposed houses - has been designated a SSSI, with the stretch from Hope under Dinmore to its confluence with the Wye at Mordiford being further designated a Special Area of Conservation because of the rarity of the wildlife that it supports.

2. Historically, the Lugg Meadows are one of only 14 extant 'Lammas Meadows' in the country that are still functioning, and uniquely among these it is still managed in largely the same way as in mediæval times - in fact, its history can be traced to Domesday Book and earlier.

3. From a planning angle:

I am deeply concerned that waste water drainage will simply end up in the Lugg, despite the developers' proposed 'sustainable drainage system'.

The National Planning Policy Framework sets the national policy context for protection of conservation sites and states that development likely to have an adverse effect on a Site of Special Scientific Interest (either individually or in combination with other developments) should not normally be permitted.

This proposal appears to go directly against the grain of Herefordshire Council's Core Strategy Policy: Landscape and Townscape to 'conserve, restore, and enhance the biodiversity of Herefordshire'.

**Attachment:**

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Their contact details are as follows:

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**Infrastructure from section 106 to consider:** In brief, I think the following will or may be needed:

- GP surgery
- Wifi
- water run-off and land drainage concerns, above and in the Wildlife Trust's objection, robustly and correctly resolved
- shop - probably more than a farm shop would be needed
- possibly a school - I don't know enough about local primary school needs to know whether one is needed
- agreement with Herefordshire Wildlife Trust on how to manage the access by significant new numbers of visitors to this SSSI - eg access limited to certain paths or areas, special view-points - the HWT will know better than I do.
- 3-year subscriptions for all the new households to Herefordshire Wildlife Trust to encourage buy-in to the critical importance of protecting this landscape.

I'm sure there is more, but I have run out of time.

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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)

