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The Herefordshire Wildlife Trust
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Wednesday 30 April 2025

Dear Ollie Jones,

Ref Application Reference: 240422

Address: Land to the East of Hereford, South of Ledbury Road (A438), Hereford

Proposal: Outline planning application for the demolition of existing buildings and structures and the erection of up to 350 dwellings (including affordable housing), a farm shop and café, employment workspaces, and land for a potential primary school, along with associated parking, access roads, walking and cycling routes, public open space, landscaping, sustainable urban drainage and other associated works, site clearance and infrastructure. All matters reserved except access, which is partially reserved, with detailed approval sought for the primary vehicular site access via the A438.

Objection

These comments are in addition to those submitted on **Wednesday 20th March 2024 and Wednesday 17th April 2024** in light of the additional information supplied by the developer at this stage.

Recreational pressures on Upper Lugg are high and increasing and are already impacting on the meadow through increased trampling, disturbance, dog walking, dog fouling, vandalism and noise. These pressures have led to difficulties in managing the site for hay (e.g. fouling of the grass, trampling, vandalism when hay making) and aftermath grazing (inability to guarantee safety of grazing animals, rise in parasitic diseases in livestock). This latest plan shows a reduction in the number of houses but this is still a significant housing development and it will have a significant impact on the Lugg Meadows and River Lugg.

The effect of these new houses and their occupants so close to the area of SSSI floodplain grassland, a habitat recognised as threatened in the EU (Listed in Annex 1 of the EU Habitats Directive under category 6510 Lowland Hay Meadows) cannot be summarily dismissed as insignificant as has been done in the report. There are already recreational problems which the report does not acknowledge and the suggestion that adding to these will have no significant effect without any supporting data or evaluation is a serious omission. It is the Wildlife Trusts view that the occupants and associated pets (in particular dogs), associated with the development of these homes, all potentially accessing the adjacent SSSI from a public right of way running across the development site and onto the Lugg Meadow is likely to have a significant, localised, detrimental effect upon the condition and wildlife value of a nationally important and designated floodplain grassland.

The Ecological Impact Assessment acknowledges the impact of domestic cats on ground nesting birds. However, we do not believe that the use of cat proof fencing as suggested on page 19 as a mitigation will be effective, particularly given the extent of the fencing indicated on the photo on page 20 of the assessment. This fencing will not easily exclude domestic cats from the Lower Lugg meadow and doesn't provide any protection for Upper Lugg Meadows.

The proposed 15ha area of new 'open public access land' to attempt to reduce the impact of the new development on Lugg meadows adjoining the meadows may actually increase the footfall across the Lugg Meadows with more dog walkers in the area. Unless there is clear signage between the public open space and nature reserve it is likely dogs will be allowed to wander uncontrolled. Breeding Curlews on the site are already under pressure and additional footfall and dogs on site may cause this to deteriorate even further. The addition of new public rights of way will make access to the Meadows even easier and may actually increase the impact of the development.

Herefordshire Council's new Local Nature Recovery Strategy (LNRS) clearly shows that proposed develop area has been identified as one for 'Open Habitat Opportunities' and 'Wetland Opportunities' (see map shown below). It would seem therefore, that this development proposal is in direct conflict with the LNRS and its primary aims and objectives which was to identify areas for nature recovery and wildlife connectivity.



Image 1 – screenshot of the LNRS from Herefordshire Council Website

It is also worth noting that the updated documents submitted by the applicant fail to address any of the other comments we previously raised which is why we are only addressing the levels of disturbance on this occasion.

As an organisation we are currently working on numerous projects which are working towards reconnecting our rivers with their floodplain. This work aims to improve wildlife connectivity, support nature's recovery, and use nature based solutions to mitigate climate change and increased flood risk. This development proposal seems counter intuitive to everything that we are trying to achieve with our numerous project partners and stakeholders.

Yours sincerely

A solid black rectangular box used to redact the signature of Claire Spicer.

Claire Spicer

Head of Nature Recovery

