

Planning application comment was submitted on the **04 April 2024 12:15 PM**

The following is a comment on application **P240422/F** by **Kathy Burrows**

Nature of feedback: Objecting to the application

Comment: The proposed development is completely unacceptable. There will be a greatly increased number of people visiting the Lugg Meadows, an increased number of dogs and cats, noise, light pollution and traffic. This is likely to have a significant impact on the flora and fauna of the meadows. In particular, the increased disturbance would impact the breeding curlew, which are already threatened with local extinction and the subject of a conservation project at the site.

SSSI status is the greatest protection a habitat can have in the UK and should mean it is preserved in perpetuity. Floodplain meadows have become incredibly rare with only around 1,200 hectares of this habitat remaining in the UK. They fulfil natural functions of flood management, pollution reduction and carbon sequestration alongside the provision of fantastic, specialised, wildlife habitat. This habitat is also included in Herefordshire's Biodiversity Action Plan as one that conservation groups have identified as particularly under threat in the county and in need of preservation. The nature reserve is home to many rare species of plants and animal including the snake's head fritillary and a small population of breeding curlew.

Herefordshire Wildlife Trust are currently running a project to recover rare floodplain plants on Lugg Meadows. Funded by Natural England (NE) through its flagship Species Recovery Programme (SRP), the project aims to recover populations of narrow-leaved water-dropwort and mousetail - through habitat enhancement and sowing and planting at the meadows which lie within the River Wye Catchment.

The Trust also has concerns about the impact on the River Lugg, designated a Special Area of Conservation, already under huge pressure from pollution and described by Natural England as "unfavourable/declining." The proposals do not guarantee that run-off from the development (which may include a wide range of pollutants e.g. oils, phosphates from car washings, paints, bleach) cannot enter the Lugg Rhea and, from there, the meadows and the River Lugg.

It is designated as a Site of Special Scientific Interest, the highest protection a site can have and it is imperative that it is protected as it should be.

The proposed 350-home development would risk irreversible damage to this precious, sensitive ecosystem through increased water pollution, noise and light pollution, road traffic and footfall from visitors.

Planning Policy Considerations

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.

The proposed development does not sit within the core strategy for housing HD1.

The Herefordshire Council Core Strategy policy LD1 – landscape and townscape states that development proposal should; 'conserve and enhance the natural, historic and scenic beauty of important landscapes and features.' LD2 also states that 'development proposals should conserve, restore and enhance the biodiversity of Herefordshire'. It is our belief that this development would not meet these objectives.

Attachment:

Their contact details are as follows:

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Infrastructure from section 106 to consider: N/a

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

Form reference: FS-Case-602695719