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Friday 26th September 2025

Dear Ollie Jones,

Application Reference: 240422

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

Further Objections submitted re planning application P240422/F

Herefordshire Wildlife Trust recognises that the new proposals are for a slightly smaller overall development which may, therefore, have a slightly lessened impact on the Lugg Meadows SSSI, its habitats and its flora and fauna.

However, our key concerns remain as stated in our original response of 20/03/2024 and additional comments sent to you on 30/04/2025; we don't believe any of the changes made have addressed or mitigated our original concerns. The new proposals also raise additional concerns. These are detailed below and should be read alongside our original response as additional points.

Removal of buffer zone between housing/ recreational land and Lugg Meadows SSSI.

As we stated in our original objection: "The site forms part of an important buffer for Lugg and Hampton Meadow SSSI and the River Lugg SAC. Buffer zones are acknowledged as important components of any coherent and resilient ecological networks. The buffer land forms a fringe along the entire length of the floodplain between the Worcester Road in the north and the Lugg Rhea confluence with the River Lugg. It contains Herefordshire Wildlife Trust reserves and Hereford Council Local Nature Reserves. The buffer land, within which this site lies, forms an important component of a historic floodplain and was once part of the medieval farming system in which the Lugg Meadow played such a crucial role.

"Natural England highlights the buffer zones for all SSSIs on their web based "Magic" mapping system. The proposed development site lies within both the closest and next closest buffer zones to the Lugg Meadow SSSI as defined by Natural England. The greater the proximity to an SSSI, the greater the likelihood for development adversely affecting protected sites. NE

highlights that for hydrological discharges, the distance of a potential development from an SSSI can have an effect at a greater distance than for other potentially damaging activities.”

In the initial proposal, the use of the land to the east of the access road, had been proposed for ecological enhancement with limited public access. The new proposal makes this open space accessible to the public with the aim to reduce the recreational pressure on the Herefordshire Wildlife Trust land to the north of the A38. Whether this change will achieve this aim can only be guessed at but it definitely removes any ecological buffer zone, exposing the SSSI land to increased disturbance from people and pets, light, noise and pollution.

Impacts from increased recreation at Lugg Meadows SSSI

The new proposals state that the increased open space provision, and links to Public Right of Way networks, will lessen recreational impact on the Lugg Meadows SSSI from people living in, working in and visiting the new development. There is no case study or modelling to base this assumption on; this remains a key concern for the Trust.

The publicly accessible, open space provision is now, in fact, right up against the Lower Lugg Meadow SSSI. This would make accessing the SSSI far easier and more tempting for children and pets to hop over a fence or through a hedgerow. The Lower Lugg Meadow is one of the very few remaining places in the county where curlew breed and is closed to public access during the breeding season (excepting PROWs). This restriction is clearly stated at entrances and is mostly respected by visitors but having a permeable boundary all along the western edge of the SSSI between the meadows and a public recreation area clearly poses a threat to this restriction.

The Trust does not feel that concerns around additional pets on the Lugg Meadows have been adequately addressed.

The guesstimated number of households with ‘outdoor’ cats is based on national averages which will include those living in flats and urban areas – there is no evidence that the number of households owning a cat in an affluent, peri-urban area is likely to match a national average. In the developers’ Environmental Impact Assessment, they quote an RSPB report: “ ‘Cat predation can be a problem where housing is next to scarce habitats such as heathland, and could potentially be most damaging to species with a restricted range... or species dependent on a fragmented habitat’ ”. Lowland, floodplain, species-rich meadows *are* an incredibly rare habitat and are home to species with a restricted range linked to this habitat such as curlew and skylark – this report therefore highlights the risk of the development. The EIA also states: “cats can predate birds that nest on the ground or near to the ground such as skylark, reed bunting, common whitethroat and linnet, which are present in the Site.” These are key species which rely on the habitats within the nature reserve, and we believe the increased risk to their populations is untenable. All proposed measures suggested in the EIA to limit the impact of cats are entirely at the householders discretion and may, or may not, be put into place and so cannot be counted as effective mitigation.

The only mitigation confirmed in this proposal to minimise the impact of an increased number of dogs in the location is to install signs encouraging responsible dog ownership and asking for any access restrictions to be adhered to. There is no guarantee that these will be adhered to and we do not accept this as adequate mitigation. There is mention in the EIA of additional dog waste bins but no confirmation of who would be responsible for emptying these daily and the

costs this would incur. Similarly, the EIA mentions on-site wardens but no detail of who these wardens would be employed and paid by.

Increased disturbance

The EIA states that “any noise resulting from the proposals would be of a similar scale and nature to existing sources” and that “the erection of a temporary timber hoarding fence to keep visual disturbance to a minimum during construction, as well as a more permanent solution comprising an earth bund/bank” will be sufficient mitigation. We accept that the A438 is a busy road that will have already permanently impacted wildlife populations and that remaining wildlife may be habituated to, we do not agree that the construction and long-term existence of the development will cause no additional disturbance. While mitigations for minimising disturbance may be effected, the additional traffic along the farm access track, traffic to, from and within the development and construction noise will all impact the SSSI. It is likely that, rather than wildlife populations being habituated to disturbance, they are already stressed by the environment (hence sub-optimal population abundance of e.g. curlew) and additional visual and noise disturbance, even if within levels deemed acceptable in other situations, will have a detrimental, if not terminal affect. Similarly, while the proposals now include a Sensitive Lighting Strategy, an overall increase in light pollution is inevitable.

As currently proposed there remains likely adverse effects on the River Lugg SAC (SSSI) and the Lugg & Hampton Meadows SSSI – contrary to Conservation of Habitats & Species Regulations, NPPF, LURA and NERC Acts, Environment Act, Core Strategy Policies including SS1, SS6, SD4 and LD1-3, and the council’s declared Climate & Ecological Emergency.