

2 October 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**

Plantlife writes to uphold our objection to the updated proposals for development on this site. Although we recognise that the proposal is now for fewer dwellings, we still have pertinent concerns. This letter should be read alongside Plantlife's previous objections (dated 15/05/2025).

**1. Decision by Herefordshire Council to not require an Environmental Statement**

1.1 We do not agree with the decision to not require an Environmental Statement, as per the 'Town and Country Planning (Environmental Impact Assessment) regulations 2017 Screening Matrix document. We disagree with the conclusion that the proposed development is not likely to have significant effects on the environment, as the development is directly adjacent to the Lugg and Hampton Meadows Site of Special Scientific Interest (SSSI) and is at risk of cumulative, indirect impacts from the development that were not sufficiently recognised within the Screening Matrix assessment.

**2. Nitrogen deposition impacts**

2.1 We disagree with the assessment in question 6.1 that no significant adverse ecological effects are likely from nitrogen deposition. As acknowledged in the latest Ecological Impact Assessment ("EclA"), the Lugg and Hampton Meadows SSSI has exceeded nitrogen deposition loads since 2003, and the development would likely cause a nitrous oxide (NOx), ammonia (NH3) and nitrogen deposition of slightly greater than the 1% critical level/load threshold for the designation, with nitrogen deposition critical load being exceeded within all scenarios modelled, according to the EclA. The EclA cites Natural England (NE) vegetative studies of the site from 2011 and the 'favourable' conservation status of the SSSI as reasons as to why this development is unlikely to have a significant impact on the SSSI. However, the vegetation could have significantly changed in the nearly 15 years since the study was conducted. Further, NE's confidence in the assessment of the conservation status was listed as 'Low Confidence' on the 31/3/2025<sup>1</sup>.

2.2 The EclA and EIA Screening Matrix assessment do not acknowledge the risk and impact of both dry and wet nitrogen deposition, which can carry and deposit nitrogen over wide areas and damage wild plants, fungi, lichen, and bryophytes (as set out in detail in our previous objection).

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<https://designatedsites.naturalengland.org.uk/SiteFeatureCondition.aspx?SiteCode=S2000725&SiteName=Lugg%20and%20Hampton%20Meadows%20SSSI>

### 3. Significant effects on protected areas

- 3.1 We disagree with the assessment in question 9.1, that the embedding of the listed mitigation hierarchy measures into the scheme design would mean that ‘significant effects [on protected areas] are not likely in EIA terms’. As we have previously stated, the risk of nitrogen deposition could lead to negative impacts on the features for which it was designated as a SSSI (such as MG4 grassland and two vascular plant species).
- 3.2 Water level changes have been explicitly listed as a pressure for the Lugg and Hampton Meadows SSSI by NE, with unique hydrology being particularly important for MG4 grassland plant communities. If there is damage to the nationally important floodplain meadow SSSI, then compensatory habitat restoration or creation elsewhere could not replace the complex interactions, functions, wildlife, and lifecycles that depend on the health of the ancient Lammas meadow
- 3.3 The River Lugg (part of the River Wye SAC) lies 230m to the north-east of the development. The proximity and position of the proposed development site means that the hydrology of the site will always naturally drain into the tributary Lugg Rhea and ultimately the SAC. There is a clear risk that surface water run-off, both during the construction and when the development is in place. According to the Flood Risk and Drainage Strategy (August 2025), ‘the proposed strategy is for the development to discharge into the tributary of the River Lugg’ and ‘the infiltration testing demonstrates that the majority of the site is not freely draining.’ Whilst there are Sustainable Urban Development Systems (SUDs) proposed, the site-specific SUDs design and detailed maintenance plan would need to be assessed to understand their effectiveness in preventing pollutants from flowing in the Lugg Rhea and into the SAC, as well as the risk posed to their efficacy from flooding events. There are extensive maintenance requirements listed in the Drainage Strategy, and it is not clear who would be responsible for ensuring maintenance inspections are upheld. Therefore, there remains a risk that run-off could contain a range of pollutants such as bleach, cleaning chemicals, paint, oils, phosphates, run-off from gardens (fertilisers, herbicides and pesticides). Pollutants could negatively impact the water quality in the River Lugg SAC and damage the sensitive ecosystem of the floodplain meadow SSSI, therefore risking damage to their features for which they are afforded protected status.
- 3.4 Although the Ecl IA includes suggestions that dog litter bins and notice boards could be implemented- alongside a warden for the Nature Reserve - to help manage increased pressure from pets, there is no detail on who would be responsible for the funding and implementation of these measures. There is also no mention in the Ecl IA of the impact of urine on sensitive plant species and habitats, which is also a driver of eutrophication impacts.
- 3.5 Our previous recommendation has not been implemented; that a botanical survey at a National Vegetation Classification (NVC) level should be conducted, in order to confirm the correct habitat characterisation. In addition, we recommend an important plant survey to identify nationally-important plant species and assess the potential impact of the development upon them.

**4. Impact on protected, important, or sensitive species in or around the site**

4.1 We disagree with the assessment in question 9.2, as we think there may be a risk to important and sensitive plant species on the adjacent SSSI from the reasons set out above and in our previous objections. The potential impact on plant species was not considered within the Ecl IA or the Herefordshire Council Environmental Statement. For example, the impact should have been considered for plants for which the site was designated as a SSSI; the nationally scarce Narrow-leaved Water-dropwort (*Oenanthe silaifolia*), which is listed as “near threatened” in the vascular plant Red List for Great Britain, as well as Mousetail (*Myosurus minimus*) - a nationally declining species listed as ‘vulnerable’ in the vascular plant Red List for Great Britain and rare in Herefordshire.

In summary, Plantlife retains our previous objections to the amended development proposal.

Yours sincerely,

Jo Riggall

Grassland Advocacy Officer