

# Appropriate Assessment

Report for:

**Bredenbury & District Group Neighbourhood Area**

**April 2021**



# **Bredenbury, Wacton and Grendon Bishop Neighbourhood Plan**

## **Appropriate Assessment**

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## **Executive summary**

This report addresses the Appropriate Assessment (AA) stage of the HRA and considers the likely significant effects on the integrity of the River Wye (including the River Lugg) SAC. This NDP has been identified as requiring AA due to the neighbourhood area being within the hydrological catchment of the River Frome.

A previous Habitat Regulation Assessment has been undertaken on the Bredenbury, Wacton and Grendon Bishop Neighbourhood Plan dated October 2013, however recent advice and responses from Natural England is indicating that a Stage 2 Appropriate Assessment is required.

This report addresses the Appropriate Assessment stage; outlines the task undertaken, the findings and recommendations to support the Bredenbury, Wacton and Grendon Bishop Neighbourhood Plan through to adoption.

The Initial Screening report October 2013 found that the Neighbourhood Area is within the hydrological catchment of the River Wye (including the River Lugg) SAC. The parish is 5.6 km away from the River Lugg SAC but is within the River Frome catchment which is part of the hydrological catchment of the River Wye SAC. Therefore a full screening assessment is required.

The majority of the policies within the Bredenbury, Wacton and Grendon Bishop NDP are not site allocations but have criteria to support development. They would all require a further planning application.

The four site allocations (Policy BW and GB 4) in Bredenbury have also been assessed. It should be borne in mind that site allocations do not grant planning permission and all site allocations will be subject to a more detailed assessment at planning application stage.

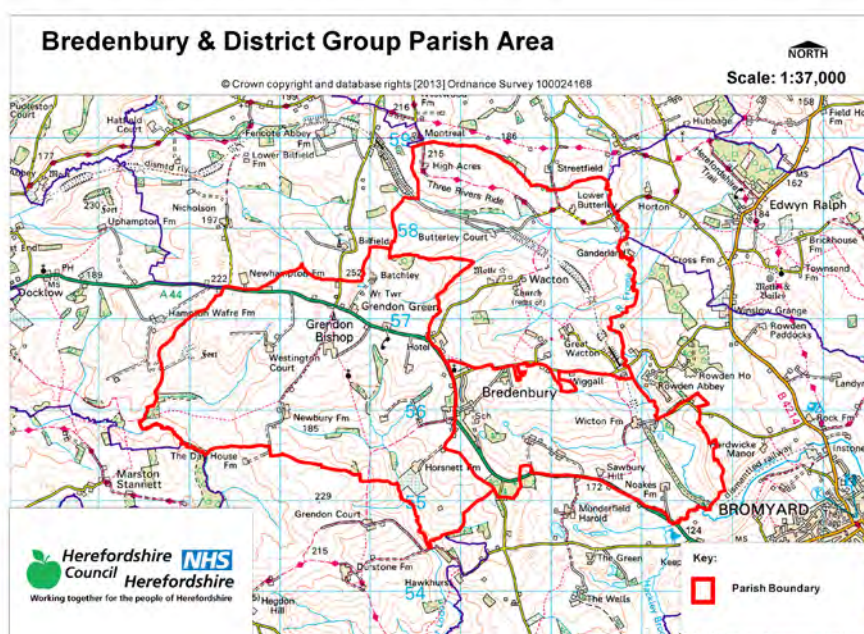
The most significant issue with the Lugg catchment is regarding water quality and these issues form the majority of the assessment of these policies. The distance from the River Frome, River Lugg and River Wye results in no direct disturbance on the qualifying feature of the SAC from the policies within the development plan.

At this stage the appropriate mitigation measures can also be considered against each of the policies. The table with appendix 3 indicates where this has been the case. Herefordshire Council are investigating a wide range of mitigation measures and working with partners to resolve the current water quality issues within the Lugg catchment. The mitigation measures references within the document could be expanded and refined prior to any planning permissions in association with the policies of this development plan are approved.

**The results of this Appropriate Assessment indicate that there will not be a significant effect on the integrity of the River Wye (including River Lugg) SAC or the (include any other) when the mitigation and avoidance measures have been taken into account.**

## 1 Introduction

- 1.1 This report address the Appropriate Assessment (AA) stage of the HRA and considers the likely significant effects on the integrity of the River Wye (including the River Lugg) SAC. This NDP has been identified as requiring AA due to the neighbourhood area being within the hydrological catchment of the River Lugg.
- 1.2 A previous Habitat Regulation Assessment has been undertaken on Bredenbury, Wacton and Grendon Bishop Neighbourhood Plan March 2020, however recent advice and responses from Natural England is indicating that a Stage 2 Appropriate Assessment is required.
- 1.3 This report addresses the Appropriate Assessment stage; outlines the task undertaken, the findings and recommendations to support the Bredenbury, Wacton and Grendon Bishop Neighbourhood Plan Neighbourhood Plan through to adoption.
- 1.4 Bredenbury and District Group Parish Council has produced Neighbourhood Plan for Bredenbury, Wacton and Grendon Bishop in order to set out the vision, objective and policies for development within the area up to 2031. This Neighbourhood Plan will support the policies within the adopted Herefordshire Core Strategy and if adopted form part of the Herefordshire Development Plan. The Neighbourhood Plan is current at post examination stage, pending a referendum.
- 1.5 Below shows a map of the neighbourhood plan



## 2 Requirement for the HRA

- 2.1 The requirement to undertake HRA of development plans was confirmed by the amendments to the “Habitats Regulations” published for England and Wales in July 2007 and updated in 2013 and now included within the Conservation of Habitats and Species Regulation 2019 ‘the Habitats Regulations’. Therefore, when preparing its neighbourhood plan, Bredenbury and District Group Parish Council is required by law to carry out an assessment known as “Habitats Regulations Assessment”. It is also a requirement in Regulation 32 schedule 2 of the Neighbourhood Planning Regulations 2012.
- 2.2 Herefordshire Council is aware of the recent judgment (People over Wind, Peter Sweetman vs Coillte). The Court of Justice of the European Union (CJEU) ruled that the Habitats Directive must be interpreted as meaning that mitigation measures should be assessed within the framework of an Appropriate Assessment and that it is not permissible to take account of

Bredenbury, Wacton and Grendon Bishop NDP AA

measures intended to avoid or reduce the harmful effects of the plan on a European site at the screening stage. The initial screening undertaken in October 2013 and concluded that a full HRA would be required

2.3 The Co-operation Mobilisation (The Dutch case) ruling will also have an impact on Herefordshire in the areas within the catchment of the River Lugg. As this Neighbourhood Area is within the River Lugg catchment area and therefore there is a requirement for a Stage 2 Appropriate Assessment to be undertaken.

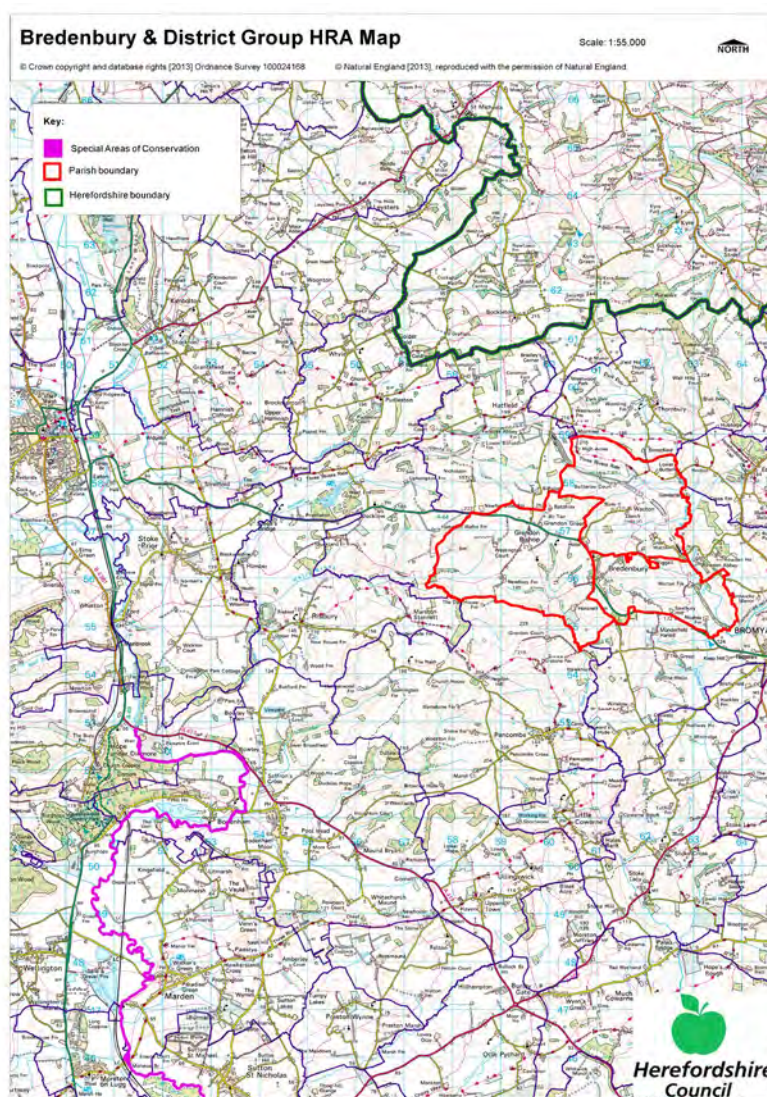
### 3 Stage 2 – Appropriate Assessment

3.1 As highlighted above the Bredenbury Wacton and Grendon Bishop Neighbourhood Plan is required to be subject to a Stage 2 Appropriate Assessment as it falls within the River Frome catchment area and within the River Wye (including Lugg) catchment area.

3.2 The screening under on October 2013 has identified that the plan may have potential impacts and effects on the following European sites:

- River Wye (including the River Lugg) SAC

The map below shows the Bredenbury Wacton and Grendon Bishop Neighbourhood Area in relation to the European Sites.



Bredenbury, Wacton and Grendon Bishop NDP AA

3.3 Previous Habitat Regulation Assessment have been undertaken in May 2019, August 2019, March 2020, whilst the neighbourhood plan has been in production. Consultation has taken place on each iteration of the report and these can be seen in Appendix 2. Recent advice and responses have indicated that further Appropriate Assessment work is required specifically within the River Lugg catchment area to consider the impact of any Neighbourhood Plan on water quality within the catchment.

3.4 The requirements of the Appropriate Assessment can be broken down into 5 areas;

- 1 Scoping
  - Collect information regarding the National Network Site
  - Any additional Environment Condition information
- 2 Assessing the impacts
  - Assess the impacts of the neighbourhood plan policies and proposals
  - Consider the in-combination effects
  - Consider the cumulative effects
- 3 Mitigation measures
  - Consider the potential mitigation measures
- 4 Summary and recommendations
- 5 Consultation

## 4 Scoping

4.1 The initial Screening report October 2013 found that the Neighbourhood Area is within the hydrological catchment of the River Wye (including the River Lugg) SAC. Therefore a full screening assessment is required.

4.2 There is also a duty under the Water Framework Directive to ensure that proposals for growth do not adversely affect the river water quality and this included the associated watercourses flowing into the rivers.

### **Site integrity of the River Wye (including the River Lugg) SAC**

4.3 The River Wye forms one of the longest near natural rivers in England and Wales. It is 25km in length and within Herefordshire runs from Hay-on-Wye to Monmouth passing through Hereford and Ross-on-Wye. This section of the river is a rare example of eutrophic river and has not been subject to straightening.

There are a number of qualifying site features within the English section of the River Wye SAC:

- Water crowfoot vegetation
- White-clawed crayfish
- Sea Lamprey
- Brook lamprey
- River Lamprey
- Twaite shad / Allis shad
- Atlantic salmon
- Bullhead
- Otter

Bredenbury, Wacton and Grendon Bishop NDP AA

- 4.4 The issues associated with maintaining the sites integrity include water levels and flow, water quality, eutrophication (nitrogen enrichment), sedimentation, disturbance and species maintenance.
- 4.5 The vulnerability data is indicating that any site allocations and policies should avoid developments within 100m of the designated banks to avoid proximity impacts.
- 4.6 The River Wye SAC can be sensitive to changes in water quantity and quality. There are some sections of the River Wye SAC, mainly the River Lugg catchment area, where the water quality targets are already exceeding set levels and therefore the river is failing its 'favourable condition' status. This area is subject to measure to reduce nutrients particularly phosphates in line with the targets. In light of the interpretation of the Dutch Case where a Site is falling its water quality objectives and is classified as unfavourable condition, there is limited scope for the approval of additional damaging effects and measures that can't be relied upon or are uncertain. The neighbourhood plan being assessed here is within the Lugg catchment area, and is 5.6km away from the groud parish.
- 4.7 However, the River Wye SAC as a whole is not currently failing its conservation status water quality levels but there are growth concerns that other stretches of the river could deteriorate in water quality following future Environment Agency testing.

#### **Environmental condition data for the River Wye SAC**

- 4.8 The River Lugg is considered to be 'failing' its water quality targets because it has exceeded the phosphate limit over 3 years testing period. Testing is undertaken between March and September by the Environment Agency.
- 4.9 Phosphorous enter the river via two distinct avenues: point source pollution (waste water treatment works 'WWTW') and diffuse source pollution (run off from roads and agricultural).
- 4.10 Discharges from WWTW are monitored and controlled by the issuing of Permitted Discharge Consents but diffuse pollution depends upon a number of different factors including land management, stock near to rivers and run off.
- 4.11 The Wye and Lugg Monitoring Dashboard indicates that as at 2019 (the latest figures published), the phosphate levels within the River Lugg at the testing point at Mordiford Bridge were recorded as 0.12mg/l with the target set at 0.05mg/l.
- 4.12 In 2019, the sewerage treatment works within the Lugg catchment area were reporting 100% compliance with phosphate limits.
- 4.13 For the Upper Wye (at Carrots Pool, Hereford) it is within target at 0.01mg/l against the target of 0.03mg/l and within the Lower Wye (at Holme Lacy) it is 0.03mg/l against the target of 0.03mg/l. The sewerage treatment works within the Upper and Lower Wye are also reporting 100% compliance with their phosphate limits.

## **5 Description of the Bredenbury, Wacton and Grendon Bishop Neighbourhood Plan**

- 5.1 The draft Bredenbury Wacton and Grendon Bishop Neighbourhood Plan presents detailed policies for development in the Neighbourhood Area up to 2031. All neighbourhood plans are required to be in general conformity with the adopted Herefordshire Core Strategy. Proportional growth for development is contained within the Core Strategy Policy RA1 and RA2 and neighbourhood plans will seek to allocate this proportional of development to be in conformity with the Core Strategy.

5.2 The Plan begins by introducing its preparation and highlighting its issues. It then details the vision for the parish over the plan period until 2031 together with a seven objectives to realise that vision:

*By 2031, the parishes of Bredenbury, Wacton & Grendon Bishop will have retained their tranquil rural character and be a great place to live, work and prosper. Our community will be thriving and have a shared sense of pride and belonging, benefitting from well-designed development which gives a stronger heart to the settlement of Bredenbury and respects and enhances the environment, heritage and natural habitats of the whole area. Key assets will have been protected and enhanced and road safety improved through the delivery of a comprehensive package of measures.*

5.3 The seven objectives cover the following topics.

- Housing
- Natural and built environment
- Infrastructure
- Highways, car parking and pavements
- Safe environments
- Support agriculture and local businesses
- Provide for the needs of our community

5.4 The initial options for the NDP (refer to appendix 4) were assessed to determine their environmental impact that could affect the River Wye SAC. Of the 27 general options put forward the 'no NDP / do nothing' option was not considered viable for the Parish. All of which indicated towards growth however all the options would be seeking to provide proportional growth in line with the Core strategy.

5.5 The neighbourhood plan also sets out 19 general policies on a variety of topic bases areas and 4 site allocations, with 1 specific site related policy. These policies include:

- Policy BW&GB 1 - Promoting a Sustainable Community
- Policy BW&GB 2 - Development Strategy
- Policy BW&GB 3 – The scale of new housing
- Policy BW&GB 4 – Housing allocations
- Policy BW&GB 5 – Housing in the countryside
- Policy BW&GB 6 – Extensions to dwellings
- Policy BW&GB 7 – Design of new housing
- Policy BW&GB 8 – Ensuring an appropriate range of tenures, types and sizes of houses
- Policy BW&GB 9 – Affordable Housing
- Policy BW&GB 10 – Protecting and Enhancing Local Character
- Policy BW&GB 11 – Heritage Assets
- Policy BW&GB 12 – Broadband and mobile telephone infrastructure
- Policy BW&GB 13 – Renewable Energy
- Policy BW&GB 14 – Transport and Connectivity
- Policy BW&GB 15 – Business development
- Policy BW&GB 16 – Protection of existing commercial business premises
- Policy BW&GB 17 – Agriculture and forestry enterprises
- Policy BW&GB 18 - Enhanced Services and Facilities for the Community
- Policy BW&GB 19 - Protection and enhancement of community facilities
- Policy BW&GB 20 - Open Spaces



5.6 The plan has current reached post examination stage and the report assesses the policies as at April 2021.

## **6 Assessing the impacts of the Bredenbury, Wacton and Grendon Bishop Neighbourhood Plan**

6.1 Each of the policies and proposals of the neighbourhood plan have been considered in more detail to ascertain whether the impacts are likely to have a significant effect on the site integrity and in combination with other neighbourhood plans and policies.

6.2 There are a number of potentially relevant plans and projects which may result in in-combination effects with the Core Strategy across Herefordshire, these plans have been reviewed and can be found in Appendix 2 of the HRA of the Core Strategy and specifically for this neighbourhood plan in the Stage A report dates (March 2018).

6.3 In terms of growth, the neighbourhood plan does not contribute above and beyond the growth targets for the housing market area requirements as set out within the Core Strategy.

The adjoining area neighbourhood plan are:

- Humber, Ford & Stoke Prior-Adopted
- Pencombe-Drafting NDP
- Bromyard- No NDP
- Hatfield and District- No NDP
- Edwyn Ralph-Drafting NDP

6.4 The combination of the growth proposed within these plans does not exceed that set out within the Core Strategy.

6.5 The HRA for the Core Strategy also identifies that both the Water Cycle Study for Herefordshire, which indicates the potential for planned water abstraction requirements combined with pressures on European Sites from the Core Strategy policies, and the review work on the Nutrient Management Plan, have both been considered as part of the in-combination assessment.

6.6 It is unlikely that the Bredenbury Wacton and Grendon Bishop Plan will have any in-combination effects with any plans from neighbouring parish councils as the level of growth proposed is the same as that proposed for the Bromyard Housing Market Area in the Herefordshire Core Strategy.

6.7 A matrix has been used to assess all the policies and proposals within the neighbourhood plan and full details can be seen in appendix 3.

## **7 Mitigation measures**

7.1 An Appropriate Assessment is being undertaken as the Bredenbury Wacton and Grendon Bishop Neighbourhood Plan is located within the River Lugg catchment area.

7.2 It is therefore the ability to consider any potential mitigation measures which could be applied which would reduce the likely significant effects on the integrity of the site. The following potential mitigation measures are indicated below.

7.3 ***Policy SD4***

Bredenbury, Wacton and Grendon Bishop NDP AA

Policy SD4 is contained within the adopted Herefordshire Core Strategy. This is not seen as a mitigation measure as the development plan should be read as a whole. However compliance with the policy is required for any planning application within the River Lugg catchment area. Therefore no site allocations proposed within the neighbourhood plan will receive planning permission unless they can also meet the criteria of Policy SD4.

7.4 It should be borne in mind that site allocations do not grant permission for a site and do not directly lead to development. All site allocations will still require planning permission to be granted before any development can take place. This means that all site allocation will be subject to a further environmental assessment/Habitat Regulation Assessment/Appropriate Assessment prior to development taking place or any potential impact to the SAC directly.

#### 7.5 **Waste Water Sewage Treatment works**

Dwr Cymru Welsh Water (DCWW) are making improvements to its Waste Water Treatment Works to reduce phosphate levels from the treatment discharge. DCWW are on target to deliver requirements within the AMP7 assessment management planning. The following treatment works within the River Wye catchment have or proposed to have phosphate limits:

- Eign, Hereford
- Rotherwas, Hereford
- Ross Lower Cleeve
- Bromyard
- Pontrilas
- Kingstone and Madley
- Leominster)
- Moreton on Lugg
- Kington
- Weobley

#### 7.5 **Nutrient Management Plan review**

The Dutch judgment means that the current Nutrient Management Plan (NMP) can no longer be relied upon as mitigation as there is not enough certainty that the measures set out within the current plan can be delivered. Therefore the current NMP does not provide reasonable scientific certainty as a mitigation measure.

7.6 The Nutrient Management Board comprises of a number of partners including Natural England, Environment Agency, National Farms Union, local planning authorities and Welsh Water.

7.7 The Board is working on reviewing and revising the NMP so that the measures contained within it can be relied upon as mitigation once more. The anticipated timescale for this is within the development plan period.

#### 7.8 **Proposed wetlands and the Interim Development Plan**

Herefordshire Council are currently investigating the potential for integrated wetlands to assist in the reduction of phosphate levels within the catchment. Wetlands can remove phosphorous from surface water runoff or stream flow or remove the final effluent from waste water treatments plants or package treatment plants. They are designed to filter, use sedimentation and plant take up. If the management of wetlands can be secured then they will provide a significant reduction in phosphorous within the catchment.

7.9 The emerging Interim Development Plan will include the proposed wetlands and other agricultural measures including buffer zones which will provide a reduction in phosphorous in the catchment.

#### 7.10 **Nutrient Neutral / betterment**

Nutrient Neutral is where mitigation measures or avoidance included within the neighbourhood plan can counterbalance any phosphate increase attributed to the plan's policies and proposals or would lead to betterment. Neutrality will need to be demonstrated with certainty. The development will need to show that it avoids harm to the protected site or provided the level of mitigation required to ensure that there is no adverse effects.

#### 7.11 **Interim approach to planning applications**

There remains potential for a positive appropriate assessment to enable development to proceed, on Natural England's advice, where it can be demonstrated that development is nutrient neutral as outlined above. Seven criteria have been established where phosphates would be unlikely to reach the river as there is no pathway for impacts, these would be adjudged during the planning application stage.

These are:

- Drainage fields is more that 50m from the designated site boundary and;
- Drainage field is more than 50m from any surface water feature (ditch, drain, watercourse and;
- Drainage field is in an area with a slope no greater than 15% and;
- Drainage field is in an area where the high water table groundwater depth is at least 2m below the surface at all times and;
- There are no other hydrological pathways which would expedite the transport of phosphorous (fissured geology, shallow soil, flooding)

## 8 **Summary of findings**

8.1 This assessment has considered the likely significant effects of the Bredenbury, Wacton and Grendon Bishop Neighbourhood Plan on the following National Network Sites

- River Wye (including Lugg SAC)

8.2 As the neighbourhood area falls within the River Lugg catchment area these have been specifically reviewed in light of recent advice from Natural England.

8.3 The table within Appendix 3 show the detail of each policy and proposals assessed.

8.4 After an initial screening 10 policies are concerned to have potential likely significant effects.

- Policy BW & GD2
- Policy BW & GD3
- Policy BW & GD4
- Policy BW & GD5
- Policy BW & GD6
- Policy BW & GD9
- Policy BW & GD12
- Policy BW & GD13
- Policy BW & GD15
- Policy BW & GD17

8.5 The 4 site allocations in Bredenbury have also been assessed. It should be borne in mind that site allocations do not grant planning permission and all site allocations will be subject to a more detailed assessment at planning application stage.

8.7 The most significant issue with the Frome catchment is regarding water quality and this forms the majority of the assessment of these policies. The distance from the River Frome River Lugg

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and River Wye results in no direct disturbance on the qualifying feature of the SAC from the policies within the development plan.

- 8.8 At this stage the appropriate mitigation measures can also be considered against each of the policies. The table with appendix 3 indicates where this has been the case. Herefordshire Council are investigate a wide range of mitigation measures and working with partners to resolved the current water quality issues within the Lugg catchment. The mitigation measures references within the document could be expanded and refined prior to any planning permissions in association with the policies of this development plan are approved.
- 8.9 **The results of this Appropriate Assessment indicate that there will not be a significant effect on the integrity of the River Wye (including River Lugg) SAC or the (include any other) when the mitigation and avoidance measures have been taken into account.**

## **9 Consultation**

- 9.1 This report will accompany the final version of the Bredenbury, Wacton and Grendon Bishop Neighbourhood Plan. The AA will have a 5 week consultation and referendum. If the referendum is successful the NDP will be made/adopted.

# Appendix 1

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**Initial Habitat Regulations Assessment and Strategic Environmental  
Assessment Screening Notification**

**The Neighbourhood Planning (General) Regulation 2012 (Reg. 32)**

**Conservation of Habitats and Species Regulations 2010 (d)**

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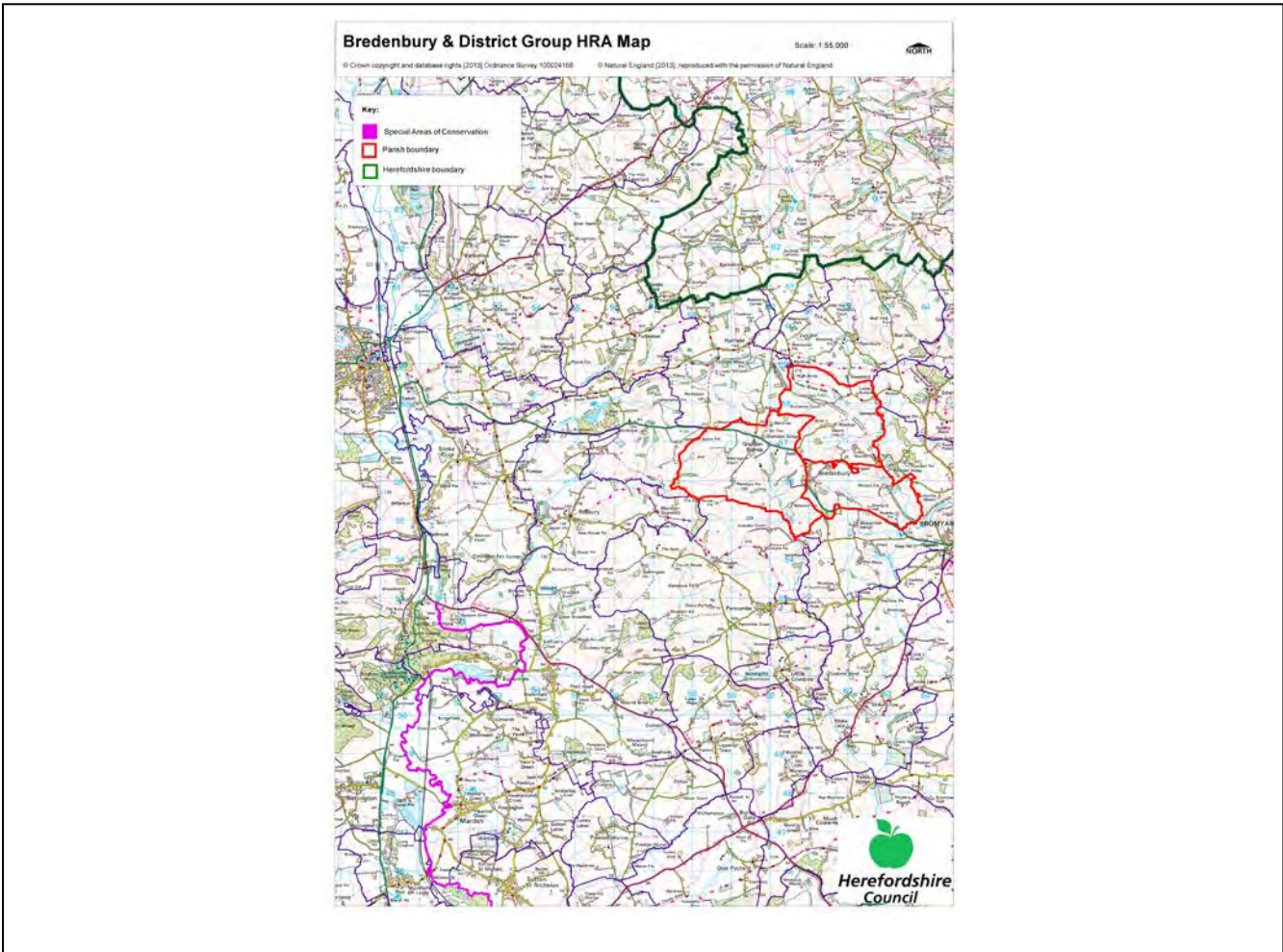
<b>Neighbourhood Area:</b>	Bredenbury & District Group Neighbourhood Area
<b>Parish Council:</b>	Bredenbury & District Group Parish Council
<b>Neighbourhood Area Designation Date:</b>	05/11/2013

### **Introduction**

This Initial Habitat Regulations Assessment (HRA) and Strategic Environmental Assessment (SEA) Screening has been undertaken to assess whether any European Sites exist within or in proximity to the Neighbourhood Area which could be affected by any future proposals or policies.

Through continual engagement the outcomes of any required assessments will help to ensure that proposed developments will not lead to Likely Significant Effects upon a European Site or cause adverse impacts upon other environmental assets, such as the built historic or local natural environment.

**HRA Initial Screening: Map showing relationship of Neighbourhood Area with European Sites  
(not to scale)**



**Initial HRA Screening**

**River Wye (including the River Lugg) SAC:**

Does the Neighbourhood Area have the River Wye (including the River Lugg) in or next to its boundary?	N	The River Lugg SAC is 5.6km away from the Group Parish
Is the Neighbourhood Area in the hydrological catchment of the River Wye (including the River Lugg) SAC?	Y	The Parish is within the hydrological catchment of the River Frome
If yes above, does the Neighbourhood Area have mains drainage to deal with foul sewage?	Y	There is mains drainage at Bredenbury (Grendon Firs)

**Downton Gorge SAC:**

Is the Neighbourhood Area within 10km of Downton Gorge SAC?	N	Downton Gorge is 22.4km away from the Group Parish
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**River Clun SAC:**

Does the Neighbourhood Area include: Border Group Parish Council or Leintwardine Group Parish Council?	N	River Clun does not border the Group Parish
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**Usk Bat Sites SAC:**

Is the Neighbourhood Area within 10km of the SAC boundary?	N	Usk Bat Sites are 54.7km away from the Group Parish
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**Wye Valley & Forest of Dean Bat Sites SAC:**

Is the Neighbourhood Area within 10km of any of the individual sites that make up the Wye Valley & Forest of Dean Bat Sites?	N	The Group Parish is 35.2km away from Wye Valley and Forest of Dean Bat Sites
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**Wye Valley Woodlands SAC:**

Is the Neighbourhood Area within 10km of any of the individual sites that make up the Wye Valley Woodlands Site?	N	The Parish is 40.7km away from the Wye Valley Woodlands
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**HRA Conclusion:**

The assessment above highlights that the following European Sites will need to be taken into account in the future Neighbourhood Development Plan for the Bredenbury & District Group Neighbourhood Area and a Full HRA Screening will be required.

**European Site**

*(List only those which are relevant from above)*

River Wye (including the River Lugg) SAC



**Strategic Environmental Assessment Initial Screening for nature conservation landscape and heritage features**

The following environmental features are within or in general proximity to the Bredenbury & District Group Neighbourhood Area and would need to be taken into account within a Strategic Environmental Assessment. In addition, the NDP will also need to consider the other SEA topics set out in Guidance Note 9a to ensure that the plan does not cause adverse impacts.

<b>SEA features</b>	<b>Total</b>	<b>Explanation</b>	<b>SEA required</b>
Air Quality Management Areas	0	There are no AQMAs within the Group Parish	N
Ancient Woodland	5	Bredenbury Wood; Hatfield Wood (border); Rowden Coppice (border); Munderfield Wood (border); Foxhall Wood (border)	Y
Areas of Archaeological Interest	0	There are no AAls within the Group Parish	N
Areas of Outstanding Natural Beauty	0	There are no AONBs within the Group Parish	N
Conservation Areas	0	There are no Conservation Areas within the Group Parish	N
European Sites	0	There are no SACs within the Group Parish	N
Flood Areas		Flood Zones 2 and 3 follow the River Frome along the eastern borders of the Group Parish	Y
Geoparks	1	Malvern Hills Geopark (border)	Y
Listed Buildings	Numerous	There are numerous Listed Buildings throughout the Group Parish	Y
Local Sites (SWS/SINCS/RIGS)	6 (SWS)	Woodland near Grendon Bishop; Woodland near Batchley; Rowden Coppice (border); Edwyn Wood (border); The Stocking Meadow and Hardwick Bank (border); River Frome	Y
Long distance footpaths/trails	2	Three Rivers Ride; Bromyard Walks	Y
Mineral Reserves	1	South east of Hampton Wafre Farm, west of Westington Court	Y
National Nature Reserve	0	There are no NNRs within the Group Parish	N
Registered & Unregistered parks and gardens	2 Unregistered	Bredenbury Court; Rowden Abbey	Y
Scheduled Ancient Monuments	2	Westington Camp; Castle Mound	Y
Sites of Special Scientific Interest	0	There are no SSSIs within the Group Parish	N

**Decision Notification:**

The initial screening highlights that the Neighbourhood Development Plan for the Bredenbury & District Group Neighbourhood Area:

- a) Will require further environmental assessment for Habitat Regulations Assessment and Strategic Environmental Assessment.

**Assessment date: 11/10/2013**

**Assessed by: James Latham**

## Appendix 1: European Sites

The table below provides the name of each European Site, which has been screened in for the purposes of neighbourhood planning in Herefordshire; includes their site features of integrity; and vulnerability data. This is based on the sites individual features of integrity and their vulnerabilities, which could include distance criteria. This has been used in identifying which parishes are likely to require a full HRA Screening of their future Neighbourhood Development Plan, to establish if their plan might have Likely Significant Effects on a European Site.

<b>Downton Gorge</b>
<b>Site Features:</b> <i>Tilio-Acerion</i> forests of slopes, screes and ravines
<b>Vulnerability data:</b> 10km for air quality associated with poultry units or other intensive agricultural practices.
<b>River Clun</b>
<b>Site Features:</b> Freshwater pearl mussel <i>Margaritifera margaritifera</i>
<b>Vulnerability data:</b> Water quality is important to maintain the site feature. Parishes either side of the River Clun will be affected.
<b>River Wye</b>
<b>Site Features:</b> Water courses of plain to montane levels with the <i>Ranunculion fluitantis</i> and <i>Callitricho-Batrachion</i> vegetation. Transition mires and quaking bogs. White-clawed (or Atlantic Stream) crayfish <i>Austropotamobius pallipes</i> . Sea lamprey <i>Petromyzon marinus</i> . Brook lamprey <i>Lampetra planeri</i> . River lamprey <i>Lampetra fluviatilis</i> . Twaite shad <i>Alosa fallax</i> . Atlantic salmon <i>Salmo salar</i> . Bullhead <i>Cottus gobio</i> . Otter <i>Lutra lutra</i> . Allis shad <i>Alosa alosa</i>
<b>Vulnerability data:</b> Proximity: Developments should not be within 100m of the designated bank. Some developments beyond 100m may also have impacts based on proximity and these issues should be addressed where possible when developing NDP policy and choosing site allocations. Water Quality: Within the whole catchment of the River Wye, which includes the River Lugg, mains drainage issues with regards to water quality are being resolved through the Core Strategy / Local Plan and development of a Nutrient Management Plan. Welsh Water should be consulted to ensure that the proposed growth will be within the limit of their consents. Otters: "An otter will occupy a 'home range', which on fresh waters usually includes a stretch of river as well as associated tributary streams, ditches, ponds, lakes and woodland. The size of a home range depends largely on the availability of food and shelter, and the presence of neighbouring otters. On rivers, a male's home range may be up to 40km or more of watercourse and associated areas; females have smaller ranges (roughly half the size) and favour quieter locations for breeding, such as tributary streams. Otters without an established home range are known as 'transients'. They are mostly juveniles looking for a territory of their own, or adults that have been pushed out of their territories. Transient otters may use an area for a short while, but they will move on if conditions are not suitable or if they are driven away by resident otters. Transients will have been important in extending the range of otters, but they are very difficult to identify from field signs. Within a home range an otter may use many resting sites. These include above-ground shelters, such as stands of scrub or areas of rank grass, and underground 'holts' – for example, cavities under tree roots and dry drainage pipes." (Source: EA website: <a href="http://www.environmentagency.gov.uk/static/documents/Business/Otters_the_facts.pdf">http://www.environmentagency.gov.uk/static/documents/Business/Otters_the_facts.pdf</a> accessed 09/04/2013)

### Usk Bat Site

**Site Features:** Annex I habitats present as a qualifying feature, but not a primary reason for site selection: European dry heaths, Degraded raised bogs still capable of natural regeneration, Blanket bogs, Calcareous rocky slopes with chasmophytic vegetation, Caves not open to the public, *Tilio-Acerion* forests of slopes, screes and ravines. Annex II species of primary reason for site selection: Lesser horseshoe bat *Rhinolophus hipposideros*, UK population 5%, although it is suggested this is an underestimate.

**Vulnerability data:** Lesser Horseshoe bats are known to migrate between 5km and 10km between their summer and winter roosts. The Lesser Horseshoe Bat is vulnerable to disturbance; light pollution; and habitat loss. Check with the planning ecologist for other issues.

### Wye Valley and Forest of Dean Bat Sites

**Site Features:** Annex II species that are a primary reason for site selection: Lesser horseshoe bat *Rhinolophus hipposideros*. Greater horseshoe bat *Rhinolophus ferrumequinum*

**Vulnerability data:** Lesser Horseshoe bats are known to migrate between 5km and 10km between their summer and winter roosts. The Lesser Horseshoe Bat is vulnerable to disturbance; light pollution; and habitat loss. Check with the planning ecologist for other issues.

Greater Horseshoe bats are known to migrate between 20-30km between their summer and winter roosts.

NDPs closest to the European Site will need to consider:

Woodland habitat buffer.

Lesser Horseshoe Bat: Old buildings; woodland locations; sheltered valleys, extensive deciduous woods or dense scrub, close to roost sites. In areas of fragmented habitats, linear habitats such as hedgerows are important corridors. Vulnerable to loss or disturbance of both summer and winter roosts and removal of linear habitat.

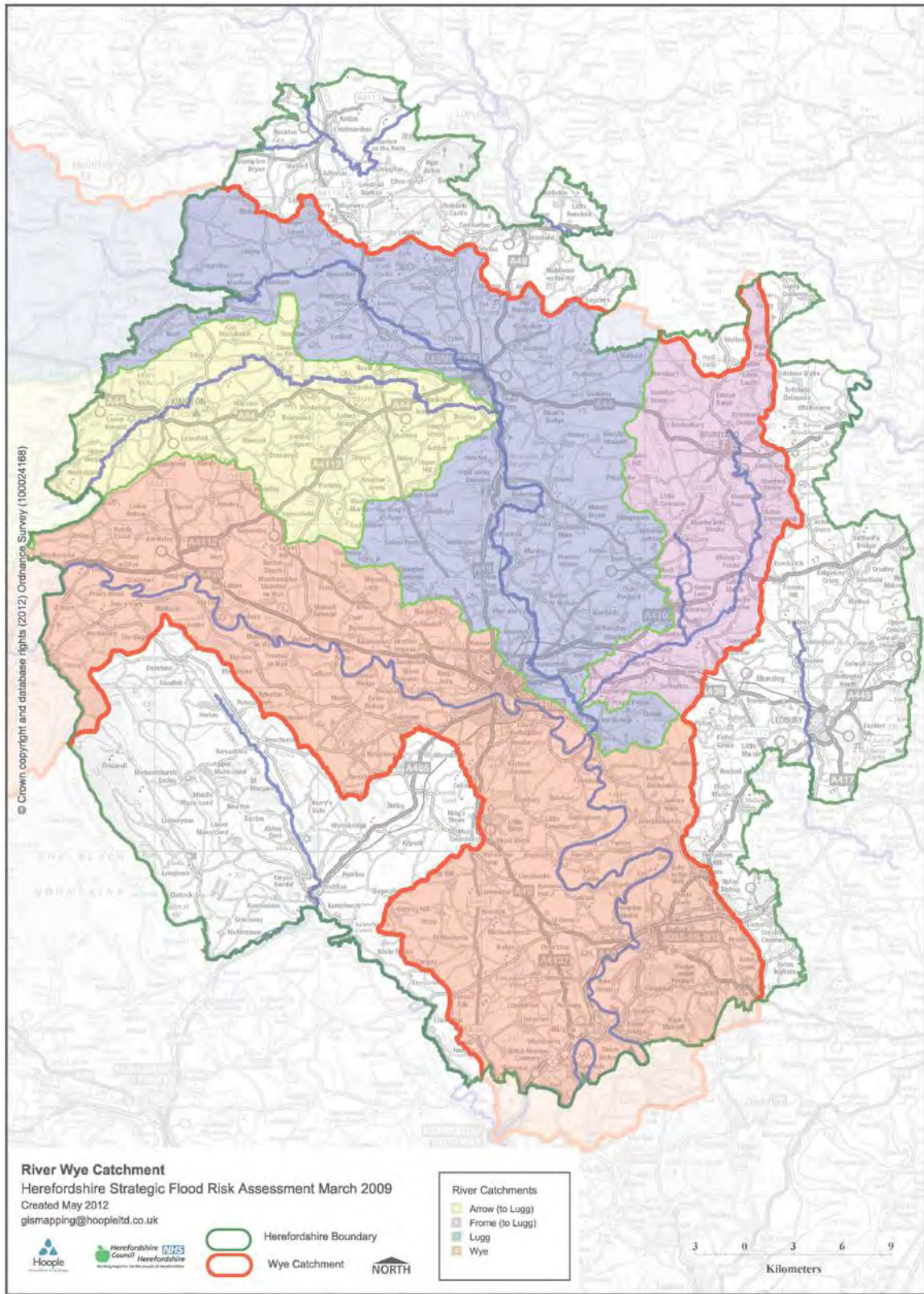
Greater Horseshoe Bat: Large buildings, pasture, edge of mixed deciduous woodland and hedgerows. Mixed land-use especially south-facing slopes, favours beetles, moths and insects they feed on. During the winter they depend on caves, abandoned mines and other underground sites for undisturbed hibernation. A system/series of sites required. Vulnerable to loss of insect food supply, due to insecticide use, changing farming practices and loss of broad-leaved tree-cover and loss / disturbance of underground roosts sites.

### Wye Valley Woodlands

**Site Features:** Annex I habitats that are a primary reason for site selection: Beech forests *Asperulo-Fagetum*, *Tilio-Acerion* forests of slopes, screes and ravines, *Taxus baccata* woods of the British Isles. Annex II species present as a qualifying feature, but not a primary reason for site selection: Lesser horseshoe bat *Rhinolophus hipposideros*, 51-100 residents

**Vulnerability data:** Lesser Horseshoe bats are known to migrate between 5km and 10km between their summer and winter roosts. The Lesser Horseshoe Bat is vulnerable to disturbance; light pollution; and habitat loss. Check with the planning ecologist for other issues. NDPs closest to the European Site will need to consider: Woodland habitat buffer. Lesser Horseshoe Bat: Old buildings; woodland locations; sheltered valleys, extensive deciduous woods or dense scrub, close to roost sites. In areas of fragmented habitats, linear habitats such as hedgerows are important corridors. Vulnerable to loss or disturbance of both summer and winter roosts and removal of linear habitat.

## Appendix 2: Wye Catchment Map



# Appendix 2

**Regulation 14 Consultation**

*Consultation date:* 10 May to 14 June 2019

*N.B. This consultation feedback is **only** for comments received on the HRA draft report*

<b>Consultee</b>	<b>Summary of Comments</b>	<b>Response to Comments</b>
Natural England	No comments on HRA received	
Heritage England	No comments on HRA received	
Environment Agency	No comments on HRA received	
Natural Resources Wales	No comments on HRA received	

**Regulation 16 Consultation**

*Consultation date:* 19 September 2019 to 31 October 2019

<b>Consultee</b>	<b>Summary of Comments</b>	<b>Response to Comments</b>
Natural England	No comments on HRA received	
Heritage England	No comments on HRA received	
Environment Agency	No comments on HRA received	
Natural Resources Wales	No comments on HRA received	

# Appendix 3



**Neighbourhood Plan Policy Screening – Bredenbury, Wacton and Grendon Bishop Neighbourhood Plan**

<b>Policy Number</b>	<b>Potential effect</b>	<b>In-combination effects</b>	<b>Likely Significant effect (Yes/ No and state how)</b>
Policy BW&GB 1 - Promoting a Sustainable Community	Policy itself will not lead to development but outlines provision for actions to achieve sustainable development.	None identified.	No LSE. This policy is seeking to protect the environment through sustainable development options.
Policy BW&GB 2 - Development Strategy	The location of the development is currently unknown, its implementation will be subject to a planning application.	Defining the area for potential housing growth Increased traffic Increased demand on water abstraction Increased demand on sewage treatment Erosion/ Trampling Non-Physical disturbance such as noise, vibration and light pollution Air pollution	LSE. The policy is seeking to deliver housing in the group parish within the plan period.
Policy BW&GB 3 – The scale of new housing	The location of the development is currently unknown, its implementation will be subject to a planning application.	Seeking the delivery of dwellings during the plan period. Increased traffic Increased demand on water abstraction. Increased demand on sewage treatment Trampling, impact on biodiversity. Erosion/ Trampling	LSE. This policy is seeking to deliver 30 dwellings to meet demonstrated local housing needs within the plan period.

Policy Number	Potential effect	In-combination effects	Likely Significant effect (Yes/ No and state how)
		Non-Physical disturbance such as noise, vibration and light pollution Air pollution	
Policy BW&GB 4 – Housing allocations	The policy could have a likely to have an impact on water quality. This policy allocates 4 housing sites to deliver 23 dwellings.	Seeking the delivery of 23 dwellings during the plan period on the 4 identified sites. Increased traffic Increased demand on water abstraction Increased demand on sewage treatment Erosion/ Trampling Non-Physical disturbance such as noise, vibration and light pollution Air pollution	LSE. The policy is seeking to delivery 23 dwellings on the 4 identified sites, within the plan period.
Policy BW&GB 5 – Housing in the countryside	The location of the development is currently unknown, its implementation will be subject to a planning application	Defining the area for potential housing growth Increased traffic Increased demand on water abstraction Increased demand on sewage treatment Erosion/ Trampling Non-Physical disturbance such as noise, vibration and light pollution Air pollution	LSE. The policy is seeking to deliver houses in the countryside within the plan period.
Policy BW&GB 6 – Extensions to dwellings	The location of the development is currently unknown, its implementation will be subject to a planning application.	Policy to set criteria for extensions for dwellings. Increased demand on water abstraction	LSE. The locations of any development is yet to be known, but result in small scale development which is likely to have an increase

<b>Policy Number</b>	<b>Potential effect</b>	<b>In-combination effects</b>	<b>Likely Significant effect (Yes/ No and state how)</b>
		Increased demand on sewage treatment Erosion/ Trampling Non-Physical disturbance such as noise, vibration and light pollution Air pollution	demand on water abstraction and sewerage treatment.
Policy BW&GB 7 – Design of new housing	Policy itself will not lead to development.	None identified.	No LSE. This policy sets out design criteria for new housing to adhere to. This policy does not lead to development itself.
Policy BW&GB 8 – Ensuring an appropriate range of tenures, types and sizes of houses	Policy itself will not lead to development.	None identified.	No LSE. This policy does not lead to development itself. This policy sets out criteria to ensure there is a mix of tenures, types and sizes of dwelling in the group parish.
Policy BW&GB 9 – Affordable Housing	The location of the development is currently unknown, its implementation will be subject to a planning application.	Defining the area for potential housing growth Increased traffic Increased demand on water abstraction Increased demand on sewage treatment Erosion/ Trampling Non-Physical disturbance such as noise, vibration and light pollution Air pollution	LSE. This policy is seeking to deliver affordable housing through rural exception sites or windfall developments.
Policy BW&GB 10 – Protecting and Enhancing Local Character	Policy is seeking to conserve, enhance or protect the built, natural and/or historic environment.	None identified.	No LSE. This policy is seeking to avoid adverse effects on the River Wye SAC. The policy seeks to protect and enhance the local character of the built and historic environment of the group parish.

<b>Policy Number</b>	<b>Potential effect</b>	<b>In-combination effects</b>	<b>Likely Significant effect (Yes/ No and state how)</b>
Policy BW&GB 11 – Heritage Assets	Policy is seeking to conserve, enhance or protect the built, natural and/or historic environment.	None identified.	No LSE. This policy is seeking to protect the historic environment and will not lead to development itself
Policy BW&GB 12 – Broadband and mobile telephone infrastructure	The location of the development is currently unknown, its implementation will be subject to a planning application.	Construction traffic. Erosion/ Trampling Non-Physical disturbance such as noise, vibration and light pollution Air pollution Increased demand on sewage treatment	LSE. The policy could have a likely to have a disturbance effect on the sensitive site The locations of any development is yet to be known This policy promotes high-speed broadband, connectivity and reliable mobile phone network.
Policy BW&GB 13 – Renewable Energy	The location of the development is currently unknown, its implementation will be subject to a planning application.	Construction traffic Erosion/ Trampling Non-Physical disturbance such as noise, vibration and light pollution Increased demand on sewage treatment	LSE. The locations of any development is yet to be known, its implementation will be subject to a planning application. This policy may lead to renewable energy development.
Policy BW&GB 14 – Transport and Connectivity	Policy itself will not lead to development. This policy sets out criteria for safer access, parking, streets and flood prevention.	None identified.	No LSE. Policy itself will not lead to development. The policy is seeking to enhance the built environment
Policy BW&GB 15 – Business development	The location of the development is currently unknown, its implementation will be subject to a planning application.	Policy to support business/ employment development. Increase in vehicle traffic. Increased demand for water abstraction and sewage treatment.	LSE. The locations of any development is yet to be known. This policy will lead to development of business and employment facilities.

<b>Policy Number</b>	<b>Potential effect</b>	<b>In-combination effects</b>	<b>Likely Significant effect (Yes/ No and state how)</b>
		Erosion/ Trampling Non-Physical disturbance such as noise, vibration and light pollution Air pollution	
Policy BW&GB 16 – Protection of existing commercial business premises	Policy is seeking to conserve, enhance or protect the built, natural and/or historic environment.	None identified.	No LSE. This policy is seeking to conserve, enhance or protect the built environment. This policy sets out criteria to protect commercial development, but sets out criteria for non business use redevelopment.
Policy BW&GB 17 – Agriculture and forestry enterprises	The location of the development is currently unknown, its implementation will be subject to a planning application.	Increased traffic Increased demand on water abstraction Increased demand on sewage treatment Erosion/ Trampling Non-Physical disturbance such as noise, vibration and light pollution Air pollution	LSE. The locations of any development is yet to be known. The policy will result in development of agricultural and forestry enterprises. Criteria contained within this policy proposes to guiding development away from the sensitive sites.
Policy BW&GB 18 - Enhanced Services and Facilities for the Community	Policy is seeking to conserve, enhance or protect the built, natural and/or historic environment. This policy strives to enhance and protect existing services and facilities for the community.	None identified.	No LSE. This policy is seeking to conserve, enhance or protect the built environment. This policy is seeking to refurbish and enhance existing services and facilities for the community, also to accommodate parking spaces in the parish.
Policy BW&GB 19 - Protection and enhancement of community facilities	Policy is seeking to conserve, enhance or protect the built, natural and/or historic environment. This policy protects the use existing community facilities: Primary school, Village	None identified.	No LSE. This policy is seeking to conserve, enhance or protect the built environment. This policy is seeking to safeguard existing community facilities over the lifetime of a neighbourhood plan.

<b>Policy Number</b>	<b>Potential effect</b>	<b>In-combination effects</b>	<b>Likely Significant effect (Yes/ No and state how)</b>
	hall, Barneby Inn and other valued community facilities.		
Policy BW&GB 20 - Open Spaces	Policy is seeking to enhance and or protect the natural environment in general. This policy safeguards open spaces within the group parish.	None identified.	No LSE. This policy is guiding development away from the sensitive sites. This policy identifies and protects open spaces in the group parish.

<b>Site Allocation</b>	<b>Potential effect</b>	<b>In-combination effects</b>	<b>Likely Significant effect</b>
North of Brockington House	The policy could have a likely to have an impact on water quality.	Policy for housing development in line with Core Strategy targets. Increase in vehicle traffic. Increased demand for water abstraction and sewage treatment. Erosion/ Trampling Non-Physical disturbance such as noise, vibration and light pollution Air pollution	LSE. This site allocation could lead to significant effects on the water and environmental quality.
South of Brockington House	The policy could have a likely to have an impact on water quality.	Policy for housing development in line with Core Strategy targets. Increase in vehicle traffic. Increased demand for water abstraction and sewage treatment. Erosion/ Trampling Non-Physical disturbance such as noise, vibration and light pollution Air pollution	LSE. This site allocation could lead to significant effects on the water and environmental quality.
Garage Field	The policy could have a likely to have an impact on water quality.	Policy for housing development in line with Core Strategy targets. Trampling, impact on biodiversity. Increase in vehicle traffic.	LSE. This site allocation could lead to significant effects on the water and environmental quality.

Site Allocation	Potential effect	In-combination effects	Likely Significant effect
		Increased demand for water abstraction and sewage treatment. Erosion/ Trampling Non-Physical disturbance such as noise, vibration and light pollution Air pollution	
Horsnett	The policy could have a likely to have an impact on water quality	Policy for housing development in line with Core Strategy targets. Increase in vehicle traffic. Increased demand for water abstraction and sewage treatment. Erosion/ Trampling Non-Physical disturbance such as noise, vibration and light pollution Air pollution	LSE. This site allocation could lead to significant effects on the water and environmental quality.

## Appropriate Assessment policy assessment – Bredenbury, Wacton and Grendon Bishop Neighbourhood Plan

### Policy BW&GB2-Development Strategy

Likely signification effect – foul water, surface water, water quality in the river.

Possible Mitigation measures:

Mitigation	Description
Policy SD4	The delineation of a settlement boundary does not grant full planning permission or lead to development. This policy also identifies the countryside will need to accommodate development in association with agriculture, tourism and other rural enterprises. A planning application will be required and any application will need to meet the requirements of Policy SD4
Main sewerage system	The site is not known at this stage, the policy covers development within the settlement boundary and countryside. Therefore it is not known if mains sewage would be available, more information would be provided at planning permission stage.
WWTW	<p>The Welsh Water Treatment Works catchment for Bredenbury (Grendon Firs). There is only one small public Wastewater Treatment Works (WwTW) within the Parish Council area, serving the small development at Grendon Green.</p> <p>DCWW have commented given the size of this WwTw it is unlikely to be able to accommodate any further development, and in any even we note that it is some distance away (circa 400m) from the nearest allocation. As such, any new development within the main settlement of Bredenbury will likely require private means of sewage treatment, in line with Policy SD4 of the Core Strategy.</p> <p>There is no indication that the treatment works is not listed as having phosphate stripping. There is no indication for additional upgrades in the WwTw within the current AMP programme.</p>
Integrated Wetlands	A programme of delivering integrated wetland is planned to create a number of wetlands to aid the reduction of phosphate within the catchment. The delivery of a number of these wetlands will be within the plan period.
Revised Nutrient Management Plan	A revised Nutrient Management Plan is underway which will contain a variety of measures by partners including the Environment Agency, Welsh Water, Farm Herefordshire and National Farmers Union to reduce phosphate levels within the catchment. This will be finalised within the plan period.
In-combination policies	The policy criteria includes the requirement for suitable sustainable drainage systems in policy BW &GB 7-Design for new housing. Policy criteria in BW&GW1 Promoting a Sustainable Community, states development should be within the infrastructure limits for sewage treatment and water supply. Policy BW&GW 10-Protecting and Enhancing local



	character to avoid harm to the natural environment, and protect and enhance local habitats and wildlife. Core Strategy Policy SD3 and SD4 and in criteria 4 of this policy promotes the conservation, restoration and enhancement of ponds and watercourses
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Residual effects – Having taken the above mitigation measures into account, it is considered that there are sufficient policy requirements and mitigation measures to ensure that any resulting planning application in relation to the provision of housing within the settlement boundary and rural sites would enable the likely significant effects of the allocation to be removed after the site has been identified. There are therefore no residual outstanding effects.

Conclusion – The possible allocation of a development site within the settlement boundary as specified within the plan does not directly lead to development. All site allocations or future development will require a planning application which demonstrates that the Policy SD3, SD4 and Policy BW& GB1, BW& GB7 and BW& GB10 have been met and taking into account the mitigation measures highlighted above it is concluded that no likely significant effects would result.

Policy BW & GB3- The scale of new housing

Likely signification effect – foul water, surface water, water quality in the river.

Possible Mitigation measures:

Mitigation	Description
Policy SD4	This policy sets out the scale of housing (30 dwellings) the group parish should aim to provide. This does not grant full planning permission or lead to development. A planning application will be required and any application will need to meet the requirements of Policy SD4.
Main sewerage system	The site is not known at this stage, the policy covers development within the settlement boundary and countryside. Therefore it is not known if mains sewage would be available, more information would be provided at planning permission stage.
WWTW	<p>Welsh Water Treatment Works catchment for Bredenbury is Grendon Firs, located north of the settlement of Bredenbury. There is only one small public Wastewater Treatment Works (WwTW) within the Parish Council area, serving the small development at Grendon Green.</p> <p>DCWW have commented given the size of this WwTw it is unlikely to be able to accommodate any further development, and in any even we note that it is some distance away (circa 400m) from the nearest allocation. As such, any new development within the main settlement of Bredenbury will likely require private means of sewage treatment, in line with Policy SD4 of the Core Strategy.</p> <p>There is no indication that the treatment works is not listed as having phosphate stripping. There is no indication for additional upgrades in the WwTw within the current AMP programme.</p>
Integrated Wetlands	A programme of delivering integrated wetland is planned to create a number of wetlands to aid the reduction of phosphate within the catchment. The delivery of a number of these wetlands will be within the plan period.
Revised Nutrient Management Plan	A revised Nutrient Management Plan is underway which will contain a variety of measures by partners including the Environment Agency, Welsh Water, Farm Herefordshire and National Farmers Union to reduce phosphate levels within the catchment. This will be finalised within the plan period.
In-combination policies	The policy criteria includes the requirement for suitable sustainable drainage systems in policy BW & GB 7-Design for new housing. Policy criteria in BW&GW1 Promoting a Sustainable Community, states development should be within the infrastructure limits for sewage treatment and water supply. Policy BW&GW 10-Protecting and Enhancing local character to avoid harm to the natural environment, and protect and enhance local habitats and wildlife. Core Strategy Policy SD3 and SD4 and in criteria 4 of this policy promotes the conservation, restoration and enhancement of ponds and watercourses.

Residual effects – Having taken the above mitigation measures into account, it is considered that there are sufficient policy requirements and mitigation measures to ensure that any resulting planning application in relation to the provision of housing in the group parish would enable the likely significant effects of the allocation to be removed after the site has been identified. There are therefore no residual outstanding effects.

Conclusion – The identification of 30 new homes are needed to demonstrate housing needs will not directly lead to development. All site allocations require a planning application which demonstrates that the Policy SD4 and Policy BW& GB1, BW& GB7 and BW& GB10 have been met and taking into account the mitigation measures highlighted above it is concluded that no likely significant effects would result.

Policy BW& GB4- Housing allocations

Likely signification effect – foul water, surface water, water quality in the river.

Possible Mitigation measures:

Mitigation	Description
Policy SD4	Overall this policy states that the plan will provide for 30 new homes. This includes the 4 allocated sites for up to 23 dwellings, in the Bredenbury settlement are nearby the Grendon Firs Welsh Water Treatment Works.
Main sewerage system	The policy covers development within this area within the settlement boundary and the four sites allocated in Bredenbury for housing development for around 23 dwellings. At this time it is not known if mains sewage would be available, more information would be provided at planning permission stage
WWTW	<p>The 4 sites are within Welsh Water Treatment Works catchment for Bredenbury (Grendon Firs). There is only one small public Wastewater Treatment Works (WwTW) within the Parish Council area, serving the small development at Grendon Green.</p> <p>DCWW have commented given the size of this WwTw it is unlikely to be able to accommodate any further development, and in any even we note that it is some distance away (circa 400m) from the nearest allocation. As such, any new development within the main settlement of Bredenbury will likely require private means of sewage treatment, in line with Policy SD4 of the Core Strategy. (June 2019).</p> <p>There is no indication that the treatment works is not listed as having phosphate stripping. There is no indication for additional upgrades in the WwTw within the current AMP programme.</p>
Integrated Wetlands	A programme of delivering integrated wetland is planned to create a number of wetlands to aid the reduction of phosphate within the catchment. The delivery of a number of these wetlands will be within the plan period.
Revised Nutrient Management Plan	A revised Nutrient Management Plan is underway which will contain a variety of measures by partners including the Environment Agency, Welsh Water, Farm Herefordshire and National Farmers Union to reduce phosphate levels within the catchment. This will be finalised within the plan period.
In-combination policies	The NDP policy criteria includes the requirement for suitable sustainable drainage systems in policy BW &GB 7-Design for new housing. Policy criteria in BW&GW1 Promoting a Sustainable Community, states development should be within the infrastructure limits for sewage treatment and water supply. Policy BW&GW 10-Protecting and Enhancing local character to avoid harm to the natural environment, and protect and enhance local habitats and wildlife. Core Strategy Policy SD3 and SD4 and in criteria 4 of this policy promotes the conservation, restoration and enhancement of ponds and watercourses.

Residual effects – Having taken the above mitigation measures into account, it is considered that there are sufficient policy requirements and mitigation measures to ensure that any resulting planning application in relation to the provision of the 4 housing sites would enable the likely significant effects of the allocation to be removed after the site has been identified. There are therefore no residual outstanding effects.

Conclusion – The allocation of the 4 sites within the plan does not directly lead to development. All site allocations require a planning application which demonstrates that the Policy SD4 and Policy BW& GB1, BW& GB7 and BW& GB10 have been met and taking into account the mitigation measures highlighted above it is concluded that no likely significant effects would result

Policy BW& GB5- Housing in the Countryside

Likely signification effect – foul water, surface water, water quality in the river.

Possible Mitigation measures:

Mitigation	Description
Policy SD4	Policy criteria for new housing development outside the identified settlement boundary, does not grant full planning permission or lead to development. A planning application will be required and any application will need to meet the requirements of Policy SD4.
Main sewerage system	The site is not known at this stage, the policy covers development outside the settlement boundary and it is not known if mains sewage would be available, more information would be provided at planning permission stage.
WWTW	<p>Welsh Water Treatment Works catchment for Bredenbury is Grendon Firs. There is only one small public Wastewater Treatment Works (WwTW) within the Parish Council area, serving the small development at Grendon Green.</p> <p>DCWW have commented given the size of this WwTw it is unlikely to be able to accommodate any further development, and in any even we note that it is some distance away (circa 400m) from the nearest allocation. As such, any new development within the main settlement of Bredenbury will likely require private means of sewage treatment, in line with Policy SD4 of the Core Strategy.</p> <p>There is no indication that the treatment works is not listed as having phosphate stripping. There is no indication for additional upgrades in the WwTw within the current AMP programme.</p>
Integrated Wetlands	A programme of delivering integrated wetland is planned to create a number of wetlands to aid the reduction of phosphate within the catchment. The delivery of a number of these wetlands will be within the plan period.
Revised Nutrient Management Plan	A revised Nutrient Management Plan is underway which will contain a variety of measures by partners including the Environment Agency, Welsh Water, Farm Herefordshire and National Farmers Union to reduce phosphate levels within the catchment. This will be finalised within the plan period.
In-combination policies	The NDP policy criteria includes the requirement for suitable sustainable drainage systems in policy BW &GB 7-Design for new housing. Policy criteria in BW&GW1 Promoting a Sustainable Community, states development should be within the infrastructure limits for sewage treatment and water supply. Policy BW&GW 10-Protecting and Enhancing local character to avoid harm to the natural environment, and protect and enhance local habitats and wildlife.

Residual effects – Having taken the above mitigation measures into account, it is considered that there are sufficient policy requirements and mitigation measures to ensure that any resulting planning application in relation to the provision of housing on rural sites would enable the likely significant effects of the allocation to be removed after the site has been identified. There are therefore no residual outstanding effects.

Conclusion – The possible allocation of a development site within rural sites as specified within the plan does not directly lead to development. All site allocations or future development will require a planning application which demonstrates that the Policy SD3, SD4 and and Policy BW& GB1, BW& GB7 and BW& GB10 have been met and taking into account the mitigation measures highlighted above it is concluded that no likely significant effects would result.

Policy BW& GB6- Extensions to dwellings

Likely signification effect – foul water, surface water, water quality in the river.

Possible Mitigation measures:

Mitigation	Description
Policy SD4	Policy criteria for new domestic extensions, does not grant full planning permission or lead to development. A planning application will be required and any application will need to meet the requirements of Policy SD4.
Main sewerage system	The site is not known at this stage, the policy covers small scale domestic extension development and it is not known if mains sewage would be affected, more information would be provided at planning permission stage.
WWTW	<p>Welsh Water Treatment Works catchment for Bredenbury is Grendon Firs. There is only one small public Wastewater Treatment Works (WwTW) within the Parish Council area, serving the small development at Grendon Green.</p> <p>DCWW have commented given the size of this WwTw it is unlikely to be able to accommodate any further development, and in any even we note that it is some distance away (circa 400m) from the nearest allocation. As such, any new development within the main settlement of Bredenbury will likely require private means of sewage treatment, in line with Policy SD4 of the Core Strategy.</p> <p>There is no indication that the treatment works is not listed as having phosphate stripping. There is no indication for additional upgrades in the WwTw within the current AMP programme.</p>
Integrated Wetlands	A programme of delivering integrated wetland is planned to create a number of wetlands to aid the reduction of phosphate within the catchment. The delivery of a number of these wetlands will be within the plan period.
Revised Nutrient Management Plan	A revised Nutrient Management Plan is underway which will contain a variety of measures by partners including the Environment Agency, Welsh Water, Farm Herefordshire and National Farmers Union to reduce phosphate levels within the catchment. This will be finalised within the plan period.
In-combination policies	The NDP policy criteria includes the requirement for suitable sustainable drainage systems in policy BW &GB 7-Design for new housing. Policy criteria in BW&GW1 Promoting a Sustainable Community, states development should be within the infrastructure limits for sewage treatment and water supply. Policy BW&GW 10-Protecting and Enhancing local character to avoid harm to the natural environment, and protect and enhance local habitats and wildlife.



Residual effects – Having taken the above mitigation measures into account, it is considered that there are sufficient policy requirements and mitigation measures to ensure that any resulting planning application in relation to the domestic extensions would enable the likely significant effects of the allocation to be removed after the site has been identified. There are therefore no residual outstanding effects.

Conclusion – The criteria for domestic extensions as specified within the plan does not directly lead to development. All future development will require a planning application which demonstrates that the Policy SD3, SD4 and Policy BW& GB1, BW& GB7 and BW& GB10 have been met and taking into account the mitigation measures highlighted above it is concluded that no likely significant effects would result.

Policy BW& GB9- Affordable Housing

Likely signification effect – foul water, surface water, water quality in the river.

Possible Mitigation measures:

Mitigation	Description
Policy SD4	Policy criteria for new affordable housing, does not grant full planning permission or lead to development. A planning application will be required and any application will need to meet the requirements of Policy SD4.
Main sewerage system	The site is not known at this stage, the policy covers criteria for affordable housing in the group parish and it is not known if mains sewage would be affected, more information would be provided at planning permission stage.
WWTW	<p>Welsh Water Treatment Works catchment for Bredenbury is Grendon Firs. There is only one small public Wastewater Treatment Works (WwTW) within the Parish Council area, serving the small development at Grendon Green.</p> <p>DCWW have commented given the size of this WwTw it is unlikely to be able to accommodate any further development, and in any even we note that it is some distance away (circa 400m) from the nearest allocation. As such, any new development within the main settlement of Bredenbury will likely require private means of sewage treatment, in line with Policy SD4 of the Core Strategy. (June 2019).</p> <p>There is no indication that the treatment works is not listed as having phosphate stripping. There is no indication for additional upgrades in the WwTw within the current AMP programme.</p>
Integrated Wetlands	A programme of delivering integrated wetland is planned to create a number of wetlands to aid the reduction of phosphate within the catchment. The delivery of a number of these wetlands will be within the plan period.
Revised Nutrient Management Plan	A revised Nutrient Management Plan is underway which will contain a variety of measures by partners including the Environment Agency, Welsh Water, Farm Herefordshire and National Farmers Union to reduce phosphate levels within the catchment. This will be finalised within the plan period.
In-combination policies	The NDP policy criteria includes the requirement for suitable sustainable drainage systems in policy BW &GB 7-Design for new housing. Policy criteria in BW&GW1 Promoting a Sustainable Community, states development should be within the infrastructure limits for sewage treatment and water supply. Policy BW&GW 10-Protecting and Enhancing local character to avoid harm to the natural environment, and protect and enhance local habitats and wildlife. Core Strategy Policy SD3 and SD4 and in criteria 4 of this policy promotes the conservation, restoration and enhancement of ponds and watercourses.

Residual effects – Having taken the above mitigation measures into account, it is considered that there are sufficient policy requirements and mitigation measures to ensure that any resulting

planning application in relation to the provision of affordable housing would enable the likely significant effects of the allocation to be removed after the site has been identified. There are therefore no residual outstanding effects.

The criteria for affordable housing as specified within the plan does not directly lead to development. All future development will require a planning application which demonstrates that the Policy SD3, SD4 and Policy BW& GB1, BW& GB7 and BW& GB10 have been met and taking into account the mitigation measures highlighted above it is concluded that no likely significant effects would result.

Policy BW& GB12- Broadband and mobile telephone structure

Likely signification effect – foul water, surface water, water quality in the river.

Possible Mitigation measures:

Mitigation	Description
Policy SD4	Policy criteria for new broadband and mobile telephone structure, does not grant full planning permission or lead to development. A planning application will be required and any application will need to meet the requirements of Policy SD4.
Main sewerage system	The site is not known at this stage, the policy covers criteria for new broadband and mobile telephone infrastructure in the group parish and it is not known if mains sewage would be affected, more information would be provided at planning permission stage.
WWTW	<p>Welsh Water Treatment Works catchment for Bredenbury is Grendon Firs. There is only one small public Wastewater Treatment Works (WwTW) within the Parish Council area, serving the small development at Grendon Green.</p> <p>DCWW have commented given the size of this WwTw it is unlikely to be able to accommodate any further development, and in any even we note that it is some distance away (circa 400m) from the nearest allocation. As such, any new development within the main settlement of Bredenbury will likely require private means of sewage treatment, in line with Policy SD4 of the Core Strategy. (June 2019).</p> <p>There is no indication that the treatment works is not listed as having phosphate stripping. There is no indication for additional upgrades in the WwTw within the current AMP programme.</p>
Integrated Wetlands	A programme of delivering integrated wetland is planned to create a number of wetlands to aid the reduction of phosphate within the catchment. The delivery of a number of these wetlands will be within the plan period.
Revised Nutrient Management Plan	A revised Nutrient Management Plan is underway which will contain a variety of measures by partners including the Environment Agency, Welsh Water, Farm Herefordshire and National Farmers Union to reduce phosphate levels within the catchment. This will be finalised within the plan period.
In-combination policies	The NDP policy criteria includes the requirement for suitable sustainable drainage systems in policy BW &GB 7-Design for new housing. Policy criteria in BW&GW1 Promoting a Sustainable Community, states development should be within the infrastructure limits for sewage treatment and water supply. Policy BW&GW 10-Protecting and Enhancing local character to avoid harm to the natural environment, and protect and enhance local habitats and wildlife. Core Strategy Policy SD3 and SD4 and in criteria 4 of this policy promotes the conservation, restoration and enhancement of ponds and watercourses.

Residual effects – Having taken the above mitigation measures into account, it is considered that there are sufficient policy requirements and mitigation measures to ensure that any resulting planning application in relation to the provision of new broadband and broadband telephone infrastructure would enable the likely significant effects of the allocation to be removed after the site has been identified. There are therefore no residual outstanding effects.

Conclusion - The criteria for new broadband and mobile telephone infrastructure as specified within the plan does not directly lead to development. All future development will require a planning application which demonstrates that the Policy SD3, SD4 and Policy BW& GB1, BW& GB7 and BW& GB10 have been met and taking into account the mitigation measures highlighted above it is concluded that no likely significant effects would result.

Policy BW& GB13- Renewable Energy

Likely signification effect – foul water, surface water, water quality in the river.

Possible Mitigation measures:

Mitigation	Description
Policy SD4	Policy criteria for new renewable energy schemes, does not grant full planning permission or lead to development. A planning application will be required and any application will need to meet the requirements of Policy SD4.
Main sewerage system	The site is not known at this stage, the policy covers criteria for new renewable energy schemes in the group parish and it is not known if mains sewage would be affected, more information would be provided at planning permission stage.
WWTW	<p>Welsh Water Treatment Works catchment for Bredenbury is Grendon Firs. There is only one small public Wastewater Treatment Works (WwTW) within the Parish Council area, serving the small development at Grendon Green.</p> <p>DCWW have commented given the size of this WwTw it is unlikely to be able to accommodate any further development, and in any even we note that it is some distance away (circa 400m) from the nearest allocation. As such, any new development within the main settlement of Bredenbury will likely require private means of sewage treatment, in line with Policy SD4 of the Core Strategy. (June 2019).</p> <p>There is no indication that the treatment works is not listed as having phosphate stripping. There is no indication for additional upgrades in the WwTw within the current AMP programme.</p>
Integrated Wetlands	A programme of delivering integrated wetland is planned to create a number of wetlands to aid the reduction of phosphate within the catchment. The delivery of a number of these wetlands will be within the plan period.
Revised Nutrient Management Plan	A revised Nutrient Management Plan is underway which will contain a variety of measures by partners including the Environment Agency, Welsh Water, Farm Herefordshire and National Farmers Union to reduce phosphate levels within the catchment. This will be finalised within the plan period.
In-combination policies	The NDP policy criteria includes the requirement for suitable sustainable drainage systems in policy BW &GB 7-Design for new housing. Policy criteria in BW&GW1 Promoting a Sustainable Community, states development should be within the infrastructure limits for sewage treatment and water supply. Policy BW&GW 10-Protecting and Enhancing local character to avoid harm to the natural environment, and protect and enhance local habitats and wildlife. Core Strategy Policy SD3 and SD4 and in criteria 4 of this policy promotes the conservation, restoration and enhancement of ponds and watercourses.

Residual effects – Having taken the above mitigation measures into account, it is considered that there are sufficient policy requirements and mitigation measures to ensure that any resulting planning application in relation to the provision of renewable energy schemes, would enable the likely significant effects of the allocation to be removed after the site has been identified. There are therefore no residual outstanding effects.

Conclusion - The criteria for renewable energy schemes as specified within the plan does not directly lead to development. All future development will require a planning application which demonstrates that the Policy SD3, SD4 and Policy BW& GB1, BW& GB7 and BW& GB10 have been met and taking into account the mitigation measures highlighted above it is concluded that no likely significant effects would result.

Policy BW& GB15- Business Development

Likely signification effect – foul water, surface water, water quality in the river.

Possible Mitigation measures:

Mitigation	Description
Policy SD4	Policy criteria to support business and economic development, does not grant full planning permission or lead to development. A planning application will be required and any application will need to meet the requirements of Policy SD4.
Main sewerage system	The site is not known at this stage, the policy covers criteria for business development in the group parish and it is not known if mains sewage would be affected, more information would be provided at planning permission stage.
WWTW	<p>Welsh Water Treatment Works catchment for Bredenbury is Grendon Firs. There is only one small public Wastewater Treatment Works (WwTW) within the Parish Council area, serving the small development at Grendon Green.</p> <p>DCWW have commented given the size of this WwTw it is unlikely to be able to accommodate any further development, and in any even we note that it is some distance away (circa 400m) from the nearest allocation. As such, any new development within the main settlement of Bredenbury will likely require private means of sewage treatment, in line with Policy SD4 of the Core Strategy. (June 2019).</p> <p>There is no indication that the treatment works is not listed as having phosphate stripping. There is no indication for additional upgrades in the WwTw within the current AMP programme.</p>
Integrated Wetlands	A programme of delivering integrated wetland is planned to create a number of wetlands to aid the reduction of phosphate within the catchment. The delivery of a number of these wetlands will be within the plan period.
Revised Nutrient Management Plan	A revised Nutrient Management Plan is underway which will contain a variety of measures by partners including the Environment Agency, Welsh Water, Farm Herefordshire and National Farmers Union to reduce phosphate levels within the catchment. This will be finalised within the plan period.
In-combination policies	The NDP policy criteria includes the requirement for suitable sustainable drainage systems in policy BW &GB 7-Design for new housing. Policy criteria in BW&GW1 Promoting a Sustainable Community, states development should be within the infrastructure limits for sewage treatment and water supply. Policy BW&GW 10-Protecting and Enhancing local character to avoid harm to the natural environment, and protect and enhance local habitats and wildlife. Core Strategy Policy SD3 and SD4 and in criteria 4 of this policy promotes the conservation, restoration and enhancement of ponds and watercourses.



Residual effects – Having taken the above mitigation measures into account, it is considered that there are sufficient policy requirements and mitigation measures to ensure that any resulting planning application in relation to the provision of business development and economic growth would enable the likely significant effects of the allocation to be removed after the site has been identified. There are therefore no residual outstanding effects.

Conclusion - The criteria for business development as specified within the plan does not directly lead to development. All future development will require a planning application which demonstrates that the Policy SD3, SD4 and Policy BW& GB1, BW& GB7 and BW& GB10 have been met and taking into account the mitigation measures highlighted above it is concluded that no likely significant effects would result.

Policy BW& GB17- Agriculture and forestry enterprises

Likely signification effect – foul water, surface water, water quality in the river.

Possible Mitigation measures:

Mitigation	Description
Policy SD4	Policy criteria for new agriculture and forestry enterprises, does not grant full planning permission or lead to development. A planning application will be required and any application will need to meet the requirements of Policy SD4.
Main sewerage system	The site is not known at this stage, the policy covers criteria for new agriculture and forestry enterprises in the group parish and it is not known if mains sewage would be affected, more information would be provided at planning permission stage.
WWTW	<p>Welsh Water Treatment Works catchment for Bredenbury is Grendon Firs. There is only one small public Wastewater Treatment Works (WwTW) within the Parish Council area, serving the small development at Grendon Green.</p> <p>DCWW have commented given the size of this WwTw it is unlikely to be able to accommodate any further development, and in any even we note that it is some distance away (circa 400m) from the nearest allocation. As such, any new development within the main settlement of Bredenbury will likely require private means of sewage treatment, in line with Policy SD4 of the Core Strategy. (June 2019).</p> <p>There is no indication that the treatment works is not listed as having phosphate stripping. There is no indication for additional upgrades in the WwTw within the current AMP programme.</p>
Integrated Wetlands	A programme of delivering integrated wetland is planned to create a number of wetlands to aid the reduction of phosphate within the catchment. The delivery of a number of these wetlands will be within the plan period.
Revised Nutrient Management Plan	A revised Nutrient Management Plan is underway which will contain a variety of measures by partners including the Environment Agency, Welsh Water, Farm Herefordshire and National Farmers Union to reduce phosphate levels within the catchment. This will be finalised within the plan period.
In-combination policies	The NDP policy criteria includes the requirement for suitable sustainable drainage systems in policy BW &GB 7-Design for new housing. Policy criteria in BW&GW1 Promoting a Sustainable Community, states development should be within the infrastructure limits for sewage treatment and water supply. Policy BW&GW 10-Protecting and Enhancing local character to avoid harm to the natural environment, and protect and enhance local habitats and wildlife. Core Strategy Policy SD3 and SD4 and in criteria 4 of this policy promotes the conservation, restoration and enhancement of ponds and watercourses.

Residual effects – Having taken the above mitigation measures into account, it is considered that there are sufficient policy requirements and mitigation measures to ensure that any resulting planning application in relation to the provision of agriculture and forestry enterprises would enable the likely significant effects of the allocation to be removed after the site has been identified. There are therefore no residual outstanding effects.

The criteria for agriculture and forestry enterprises as specified within the plan does not directly lead to development. All future development will require a planning application which demonstrates that the Policy SD3, SD4 and Policy BW& GB1, BW& GB7 and BW& GB10 have been met and taking into account the mitigation measures highlighted above it is concluded that no likely significant effects would result.