

Appropriate Assessment

Report for:

Bridstow Neighbourhood Area

January 2022



Bridstow 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 and Wye Valley and Forest of Dean Bat sites SAC.

A previous Habitat Regulation Assessment has been undertaken on the Bridstow Neighbourhood Plan dated January 2021 and October 2019, however recent advice, responses from Natural England and the Dutch Case it is considered 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 Bridstow Neighbourhood Plan through to adoption.

The initial Screening report August 2016 found that the River Wye runs along the eastern border of the parish (including the River Lugg) SAC is located inside the parish and the parish falls within the hydrological catchment of the River Wye. The Wye Valley Woodlands is 8.5km away from the parish and Wye Valley and Forest of Dean Bat Sites SAC is 7.1km from the parish.

The majority of the policies within the Bridstow NDP are not site allocations but have criteria to support development and safeguard the natural and built environment. They would all require a further planning application. The site allocations within Bridstow parish and site options were assessed in the previous assessment In October 2019. 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.

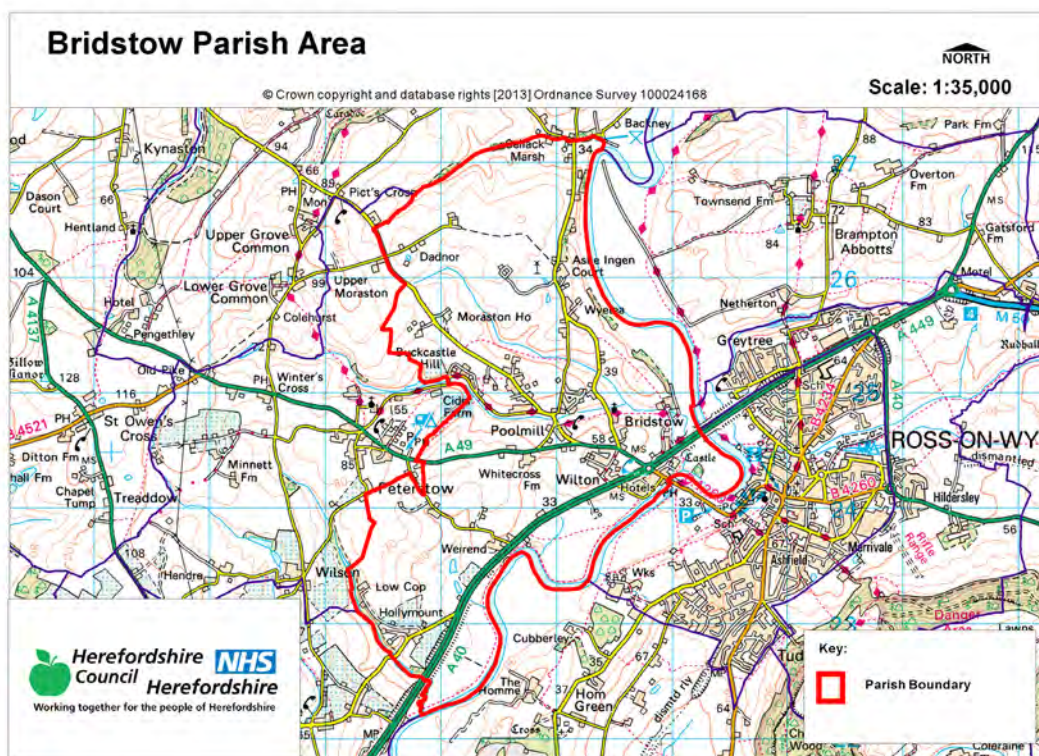
The most significant issue with the Wye catchment is regarding water quality and these issues form the majority of the assessment of these policies.

At this stage the appropriate mitigation measures can also be considered against each of the policies. The table within 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 and Wye Valley and Forest of Dean Bat sites SAC 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.
- 1.2 A previous Habitat Regulation Assessment has been undertaken on the Bridstow Neighbourhood Plan dated January 2021 and October 2019, however following recent advice, the Dutch Case and responses from Natural England it is considered that a Stage 2 Appropriate Assessment would be applicable.
- 1.3 This report addresses the Appropriate Assessment stage; outlines the task undertaken, the findings and recommendations to support the Bridstow Neighbourhood Plan through to adoption.
- 1.4 Bridstow Parish Council has produced Neighbourhood Plan for Bridstow parish 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 has completed the examination stage and is pending a referendum.
- 1.5 Below shows a map of the Neighbourhood Plan Area.



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, Bridstow 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 measures intended to avoid or reduce the harmful effects of the plan on a National Network site at the screening stage. The initial screening undertaken in August 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 Wye catchment area however it has been concluded that a Stage 2 Appropriate Assessment be undertaken to include a range of potential mitigation.

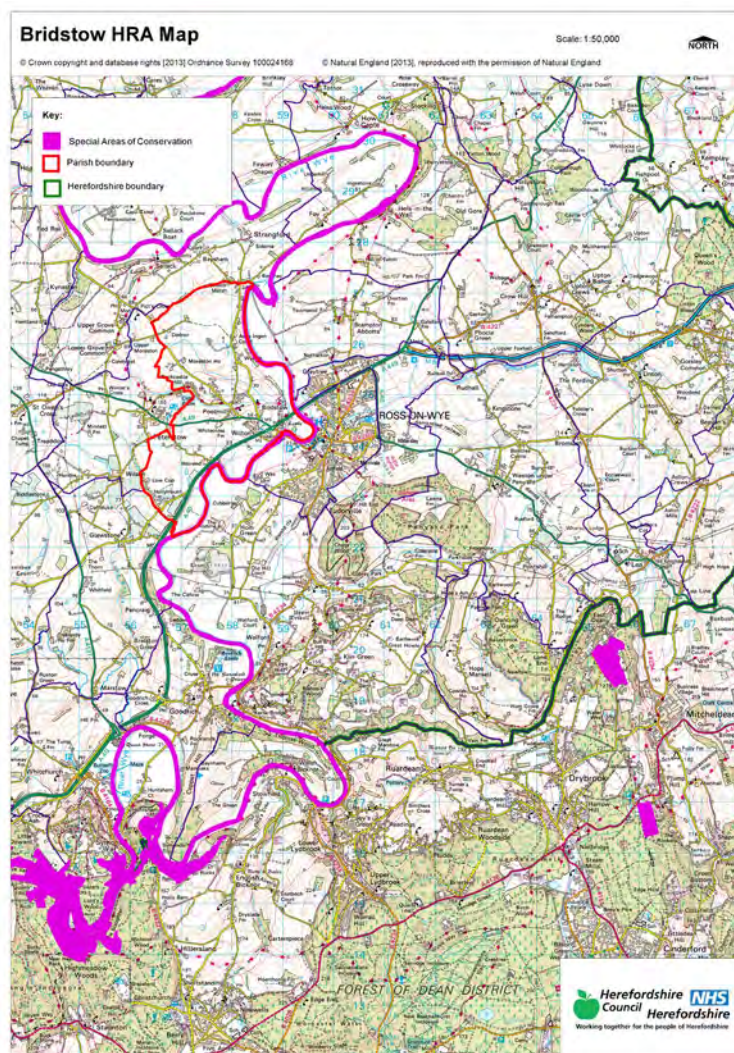
3 Stage 2 – Appropriate Assessment

- 3.1 As highlighted above the Bridstow Neighbourhood Plan is to be subject to a Stage 2 Appropriate Assessment.

- 3.2 The initial screening and scoping under on August 2013 has identified that the plan may have potential impacts and effects on the following National Network sites:

- River Wye (including the River Lugg) SAC
- Wye Valley & Forest of Dean Bat Sites SAC
- Wye Valley Woodlands SAC

- 3.3 The map below shows the Bridstow Neighbourhood Area in relation to the SACs.



3.4 Previous Habitat Regulation Assessment have been undertaken in January 2021 and October 2020 whilst the neighbourhood plan has been in production. Consultation has taken place on this iteration of the report and these can be seen in Appendix 2. Recent advice and responses to plans within the River catchment have indicated that further Appropriate Assessment work is required specifically to consider the impact of any Neighbourhood Plan on water quality within the catchment. Therefore, it is considered given the proximity of the River Wye within this neighbourhood area that an Appropriate Assessment is undertaken here.

3.5 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 August 2013 found that to the east of the Parish up to Crow Hill 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. The 25km 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.

4.4 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
- Twait shad / Allis shad
- Atlantic salmon
- Bullhead
- Otter

- 4.5 The issues associated with maintaining the sites integrity include water levels and flow, water quality, eutrophication (nitrogen enrichment), sedimentation, disturbance and species maintenance.
- 4.6 The vulnerability data is indicating that any site allocations and policies should avoid developments within 100m of the designated banks to avoid proximity impacts.
- 4.7 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 failing its water quality objectives and is classified as unfavourable condition, there is limited scope for the approval of additional damaging effects and measures that cannot be relied upon or are uncertain. The neighbourhood plan assessed within this report is within the Wye catchment area.
- 4.8 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

- 4.9 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. Although the Lower Wye is at risk of failing, it has currently not been declared as 'failing'
- 4.10 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).
- 4.11 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.
- 4.12 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.
- 4.13 In 2019, the sewerage treatment works within the Lugg catchment area were reporting 100% compliance with phosphate limits.
- 4.14 For the Lower 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.

Site integrity of the Wye Valley & Forest of Dean Bat Sites SAC

- 4.15 The Greater Horseshoe Bat and Lesser Horseshoe bat feature within the Wye Valley and Forest of Dean Bat Sites. The Greater Horseshoe Bat are known to migrate between 20-30km between their summer and winter roosts whereas the Lesser Horseshoe migrate 5km and 10km between their summer and winter roosts. The Lesser Horseshoe Bat is vulnerable to disturbance, noise and vibration, light pollution and habitat lost.

- 4.16 NDPs sites within 10 km of the Wye Valley and Forest of Dean Bat Sites will need to consider development impact to these species and their habitats. NDPs closest to the Wye Valley Woodlands 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.
- 4.17 The issues associated with maintaining the sites integrity include impact of development result in changes in landscape and townscape. As outlined within the Habitat Regulation Assessment to the Herefordshire Core Strategy, impact on European sites is dependent on scale and proximity to the European sites.
- 4.18 In relation to impact on biodiversity and important species, Policy LD2 of the Herefordshire Core Strategy indicates that any development should conserve, restore and enhance biodiversity and geodiversity assets of Herefordshire. Development within close proximity to international and local designated sites will need to incorporate sympathetic design components to enhance their nature conservation interests.
- 4.19 For full details of the three SAC attributes which contribute to and define their integrity and vulnerable data see Appendix 1 of the Bridstow Initial Screening Report. The Initial Screening Report, August 2013, can be found in Appendix 1 of this HRA report.
- 4.20 This information made it possible to identify the features of each site which determine site integrity, as well as the specific sensitivities of each site, therefore enabling later analysis of how the potential impacts of the Bridstow Neighbourhood Plan may affect site integrity.
- 4.21 The initial screening assessment indicated that a full screening assessment is required to assessment the likelihood of significant effects on the River Wye (including the River Lugg) SAC, Wye Valley and Forest of Dean Bat sites SAC on the policies within the Bridstow NDP.

5 Description of the Bridstow Neighbourhood Plan

- 5.1 The final Bridstow 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 proportion of development to be in conformity with the Core Strategy.
- 5.2 The Plan begins by highlighting its issues. It then details the vision for the parish over the plan period until 2031 together with 5 objectives to realise the vision.
- 5.3 The initial options for the neighbourhood plan were assessed to determine their environmental impact that could affect the River Wye (including the River Lugg) SAC and Wye Valley and Forest of Dean Bat sites SAC. All of which indicated towards growth however all the options would be seeking to provide proportional growth in line with the Core Strategy. Five general options were considered in total and to do an NDP with site allocations and settlement boundaries were the chosen approach. The list of options can be found in appendix 3.

5.3 The neighbourhood plan also sets out 20 policies on a variety of topics these include:

- Policy BR1 Promoting Sustainable Development
- Policy BR2 Development Strategy
- Policy BR3 Major Development within the Wye Valley AONB
- Policy BR4 Conserving the Landscape and Scenic Beauty within the Wye Valley AONB
- Policy BR5 Protecting Heritage Assets
- Policy BR6 Enhancement of the Natural Environment
- Policy BR7 Protection from Flood Risk
- Policy BR8 Sewerage Infrastructure
- Policy BR9 Sustainable Design
- Policy BR10 Housing Design and Appearance
- Policy BR11 Highway Design Requirements
- Policy BR12 Housing Development in Wilton Housing Development and Bridstow
- Policy BR13 Housing Sites in Bridstow Village
- Policy BR14 Housing Development within Buckcastle Hill Area of Special Character
- Policy BR15 Agricultural Diversification, Tourism and other Employment Enterprises
- Policy BR16 Renewable and Low Carbon Energy
- Policy BR17 Polytunnel Proposals
- Policy BR18 Protection and Enhancement of Community Facilities
- Policy BR19 Protection of Local Green Space and Areas of Open Space
- Policy BR20 High Speed Broadband and Telecommunications

5.4 Following the draft plan consultation at Regulation 14 and the submission consultation at Regulation 16, the plan has now been subject to an independent examination during the summer and autumn 2021 by Rosemary Kidd MRTPI. She has reported that the NDP has met the 'basic conditions' subject to a number of modifications to the policies. These can be found in Appendix 4.

5.5 Several objectives have been subject to modification in order to conform with national and local policy and in interests of clarification and accuracy. Objective 3b has been deleted and policies BR11 and BR22 have been deleted. Policies BR9, BR12 and BR18 had additional criteria added following examination. All policies have been rescreened in the Appropriate Assessment, for likely significant effects included these amended policies.

6 Assessing the impacts of the Bridstow 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 2015.

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.

6.4 The adjoining area neighbourhood plans are:

- Ross Town and Ross Rural – adopted
- Peterstow-adopted
- Walford- At regulation 14 consultation
- Brampton Abbots and Foy Group– adopted
- Marstow- No NDP
- Sellack- No NDP

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

6.6 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.

6.7 It is unlikely that the Bridstow 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 Ross-on-Wye Housing Market Area in the Herefordshire Core Strategy.

6.8 A matrix has been used to assess all the policies and proposals within the neighbourhood plan and full details can be seen in appendix 4.

7 Mitigation measures

7.1 An Appropriate Assessment is being undertaken as the Bridstow Neighbourhood Plan is located within the River Wye catchment area. Although this section of the Lower Wye is not failing its water quality objectives, Natural England have raised this as an issue. The consideration of mitigation also required the consideration within an Appropriate Assessment. Clearly, water quality within the SAC is the predominate issue here and this is reflected within the assessment undertaken.

7.2 It is therefore the ability to consider any potential mitigation measures, which could be, applied that would reduce the likely significant effects on the integrity of the site. The following potential mitigation measures are indicated below. The summary of findings will indicate if any of these are relevant to the Bridstow NDP.

Policy SD4

7.3 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 catchment area. Therefore, no site allocations proposed within the neighborhood 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 Although all proposals will need to demonstrate compliance with Policy SD4, this does not give sufficient scientific certainty alone and other measures will need to be considered.

Waste Water Sewage Treatment works

7.6 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

7.7 The main settlement areas within Buckcastle Hill, Claytons, Bridstow and Wilton are served by Lower Cleeve Treatment works located in Ross on Wye. It is however noted some areas within the Bridstow parish are not on mains drainage, and will require septic tanks or private works. The plan includes policy BR8 (Sewerage and Sewerage Infrastructure), this policy acknowledges and sets criteria if there is a temporary lack of capacity at Lower Cleeve. It supports development contributes towards remedial works to WwTw's to expedite any under capacity. Therefore, this is not a mitigation measure that can be used within this NDP area but it will provide some reduction of phosphate levels within the river catchment area.

Nutrient Management Plan review

7.8 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.

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

7.10 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 but not specific dates have been given as yet.

Proposed wetlands and the Interim Development Plan

7.11 Herefordshire Council are currently investigating the potential for integrated wetlands to assist in the reduction of phosphate levels within the river Lugg 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 Lugg catchment.

7.12 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.

7.13 There are currently no plans for integrated wetlands within the Lower Wye catchment.

Nutrient Neutral / betterment

7.14 Nutrient Neutrality 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.

7.15 Although the Bridstow NDP contains a number of policies seeking to protect and enhance biodiversity and feature of the SAC, it does not contain a specific nutrient neutrality policy.

Interim approach to planning applications

7.16 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. Five 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.

7.17 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)

7.18 It should be noted that the only planning applications within the River Lugg catchment are required to demonstrate meeting these five tests at present. Bridstow is not within the River Lugg catchment but the Lower Wye.

8 Summary of findings

8.1 This assessment has considered the likely significant effects of the Bridstow Neighbourhood Plan on the following National Network Sites

- River Wye (including the River Lugg) SAC
- Wye Valley & Forest of Dean Bat Sites SAC
- Wye Valley Woodlands SAC

8.2 The neighbourhood area falls within the Lower Wye catchment area and although this area is not failing its water quality objectives at present, an Appropriate Assessment is being undertaken in light of recent comments 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 7 policies are concerned to have potential likely significant effects.

- Neighbourhood Plan Policy: BR12
- Neighbourhood Plan Policy: BR13
- Neighbourhood Plan Policy: BR14
- Neighbourhood Plan Policy: BR15

- Neighbourhood Plan Policy: BR16
- Neighbourhood Plan Policy: BR17
- Neighbourhood Plan Policy: BR20

- 8.5 The majority of NDP policies are not site allocations but have criteria to support development. All site allocations would all require a further planning application.
- 8.6 The site for Bridstow, Buckcastle Hill, Banutree and Claytons allocations have been previously screened and assessed in October 2019. Overall with mitigation criteria included in the NDP and Core Strategy it is expected to minimise effects on natural and built environments. 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 is regarding water quality and these is the forms the majority of the assessment of these policies.
- 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 investigating a wide range of mitigation measures and working with partners to resolve the current water quality issues within the Lugg catchment and are minded to the water quality within the Lower Wye catchment area.
- 8.9 The NDP would benefit from some additional wording in some of the allocation policies regarding the need for a foul and sewerage management strategy, as there are not main facilities within the parish. This would enable the considerations of drainage to be taken fully into account prior to any applications being granted.
- 8.10 The parish is not within a catchment which is currently 'failing' but it is considered that there would be some benefits to including a policy with regards to the need for nutrient neutrality if during the plan period the Lower Wye catchment did follow that of the current Lugg catchment. It is suggested that when the plan is reviewed some additional wording could be added to Policy BR8 Sewerage and Sewerage Infrastructure and some of the criteria of other specific policies as highlighted within appendix 3.
- 8.11 The mitigation measures referenced within the document could be expanded and refined prior to any planning permissions in association with the policies of this development plan are approved.
- 8.12 **The results of this Appropriate Assessment indicate that there is additional wording that could be added to policies regarding foul and sewerage management strategies and nutrient neutrality there will not be a significant effect on the integrity of the River Wye (including River Lugg) SAC and Wye Valley & Forest of Dean Bat Sites SAC or the (include any other) when the mitigation and avoidance measures have been taken into account.**
- 8.13 **However until these amendments have been made it cannot be concluded that there will not be any likely significant effects on the integrity of the River Wye (including River Lugg) SAC and Wye Valley & Forest of Dean Bat Sites SAC.**

9 Consultation

- 9.1 This report will accompany final version of the Neighbourhood Plan. This plan will proceed to referendum, if successful the plan will be adopted.

Appendix 1

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)

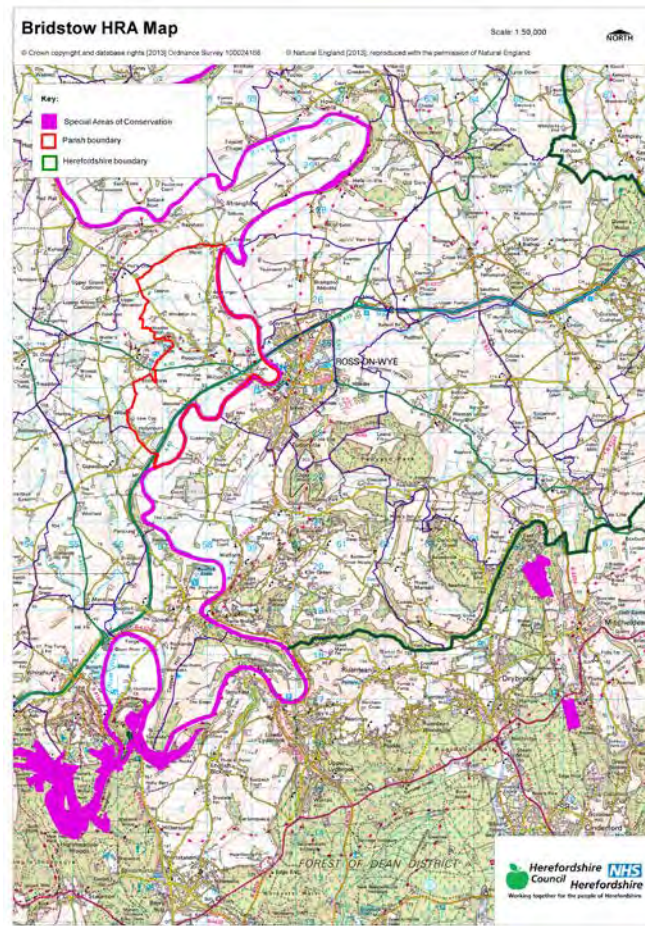
Neighbourhood Area:	Bridstow Neighbourhood Area
Parish Council:	Bridstow Parish Council
Neighbourhood Area Designation Date:	23 rd September 2013

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?	Y	The River Wye runs along the eastern border of the 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 Wye
If yes above, does the Neighbourhood Area have mains drainage to deal with foul sewage?	N	There is no mains drainage within the Parish

Downton Gorge SAC:

Is the Neighbourhood Area within 10km of Downton Gorge SAC?	N	Downton Gorge is 48.1km away from the 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 Parish
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Usk Bat Sites SAC:

Is the Neighbourhood Area within 10km of the SAC boundary?	N	Usk Bat Sites are 38.3km away from the 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?	Y	The Parish is 7.1km 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?	Y	The Parish is 8.5km 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 Bridstow 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

Wye Valley & Forest of Dean Bat Sites SAC

Wye Valley Woodlands 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 Bridstow 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.

SEA features	Total	Explanation	SEA required
Air Quality Management Areas	0	There are no AQMA's within the Parish	N
Ancient Woodland	0	There are no Ancient Woodlands within the Parish	N
Areas of Archaeological Interest	0	There are no AAls within the parish	N
Areas of Outstanding Natural Beauty	1	Wye Valley AONB	Y
Conservation Areas	2	Ross on Wye Conservation Area is in the south east of the Parish; Peterstow village (border)	Y
European Sites	1	The River Wye borders the eastern edge of the Parish	Y
Flood Areas		Flood Zones 2 and 3 run along the River Wye on the eastern borders of the Parish, and through a brook/stream from east to west, running north of Bridstow, through Poolmill and exiting the Parish by Buckcastle Hill	Y
Listed Buildings	Numerous	There are numerous Listed Buildings throughout the Parish	Y
Local Sites (SWS/SINCS/RIGS)	5 (SWS)	Fields near Wellsbrook Farm (border); Wells Brook; Marsh near Bridstow Church; Marsh near Bridstow; River Wye	Y
Long distance footpaths/trails (e.g. Herefordshire Trail)	1	Herefordshire Trail	Y
Mineral Reserves	7	Blackfields (border); 3 x sites in and around Bridstow village; North of Ross/Blackfields x 2 (border); 1 x unlabelled site by The Homme (border)	Y
National Nature Reserve	0	There are no NNRs within the Parish	N
Registered & Unregistered parks and gardens	7 Unregistered	Moraston House; Ashe Ingen Court; The Prospect (border); Merton House (border); John Kyrles Garden (border); John Kyrles Walk (border); Caradoc Court (border)	Y
Scheduled Ancient Monuments	3	Wilton Castle; Wilton Bridge (border); Churchyard Cross at St Bridget's Churchyard	Y
Sites of Special Scientific Interest	2	River Wye (Unfavourable Recovering); Wilton Bluff (Favourable) (border)	Y

Decision Notification:

The initial screening highlights that the Neighbourhood Development Plan for the Bridstow Neighbourhood Area:

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

Assessment date: 12/08/2013

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.

Downton Gorge
Site Features: <i>Tilio-Acerion</i> forests of slopes, screes and ravines
Vulnerability data: 10km for air quality associated with poultry units or other intensive agricultural practices.
River Clun
Site Features: Freshwater pearl mussel <i>Margaritifera margaritifera</i>
Vulnerability data: Water quality is important to maintain the site feature. Parishes either side of the River Clun will be affected.
River Wye
Site Features: 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>
Vulnerability data: 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: http://www.environmentagency.gov.uk/static/documents/Business/Otters_the_facts.pdf 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.

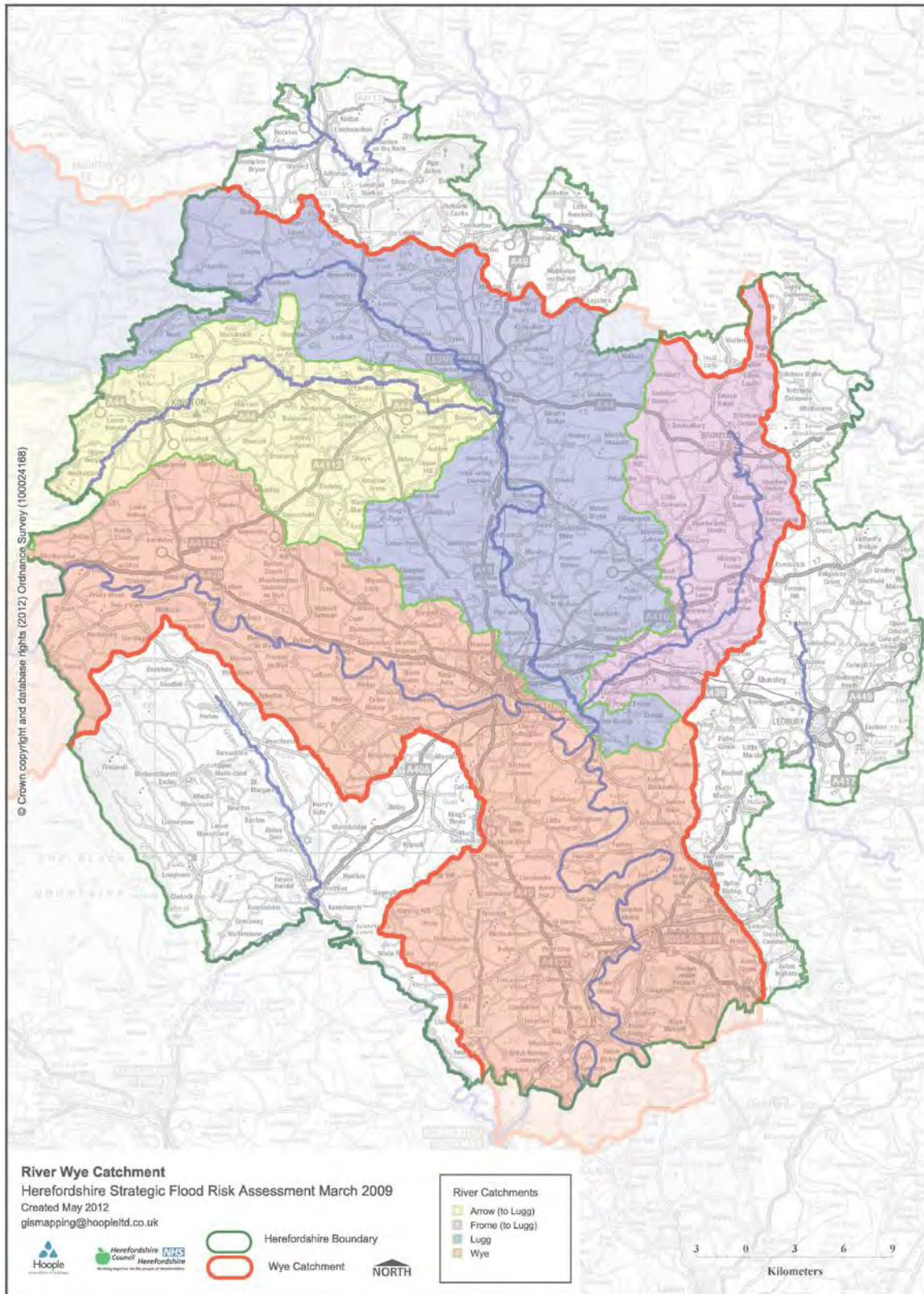
Greater Horseshoe Bat: Large buildings, pasture, edge of mixed deciduous woodland and hedgerows. Mixed land-use especially south-facing slopes, favours beetles, moths and insects they feed on. During the winter they depend on caves, abandoned mines and other underground sites for undisturbed hibernation. 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

Summary of consultation responses to Bridstow Reg 16 HRA

Consultation date: 3 February to 17 March 2021

Consultation title: Bridstow Neighbourhood Plan Regulation 16

N.B. This consultation feedback is only for comments received on the HRA of the draft Neighbourhood Development Plan

Consultee and any comments received:

- Natural England have noted that the Bridstow HRA assessment has screened out likely significant effects, with the conclusion the site allocations are not near a watercourse and the scale of growth not having an appreciable effect. However, Natural England have not agreed with this conclusion. NE recommends that this be assessed at Appropriate Assessment stage, to show how the above mentioned works can adequately mitigate the proposed development.
- Historic England – No comments received specific to HRA
- Environment Agency – No comments received specific to HRA
- Natural Resources Wales – No comments received specific to HRA

Responses to comments:

- Herefordshire Council have noted Natural England's response, a position statement has indicated that within the River Wye catchment SD4 is seen as a policy plan policy which is not considered as mitigation. However an Appropriate Assessment will be undertaken at post examination, rescreening policies again.

Appendix 3

Bridstow Group Options

Do nothing

Housing development options

Option 1 – seeking one or two relatively large sites that might accommodate the Core Strategy target for the Parish;

Option 2 – identifying a number of smaller sites that would be in keeping with the scale of development within Wilton and the 3 main settlements in Bridstow;

Option 3 – locating development where this might contribute towards creating a village core for Bridstow.

Site Options

Site 1: Bk6 Land adjacent to Salsdon Cottage. 1 dwelling.

Site 2: Bk2c Land at Oaklands (Small site). 5 dwelling.

Site 3: Bt7 Land at Whitecross. 3 dwelling.

Site 4: Bk2a/b Land at Oaklands.

Site 5: Bt4 Land at the Old Vicarage. 5 dwellings.

Site 6: W2 Land opposite Wilton Cottages*. 9 dwellings.

Site 7: Bk1 Land at Foxdale (3 dwellings).

Site 8: Bk4b Land at Cotterell's Farm (Small site) (8 dwellings).

Site 9: Bt2a/b Land at Bridruthen* (8 dwellings)

Site 10: Bt3b Land west of Wilton Roundabout* (25 dwellings)

Site 11: Bt6b Land at Tanglewood (Small site)* (5 dwellings)

Site 12: Bk7 Land adjacent to 6 Oaklands Cottages* (1 dwelling)

Site 13: C1 Land at Ash Ridge, Claytons* (9 dwellings)

Site 14: W1b/c Land off Wilton Lane, Wilton (Small site)* (9 dwellings)

Site 15: Bt3c Land west of Wilton Roundabout (Small site)*

Site 16: Bt6a Land at Tanglewood* (20 dwellings)

Site 17: Bk4a Land at Cotterell's Farm* (32 dwellings)

Site 18: W1a Land off Wilton Lane, Wilton* (16 dwellings)

Appendix 4a

Neighbourhood Plan Policy Screening – Bridstow Neighbourhood Plan

Policy Number	Potential effect	In-combination effects	Likely Significant effect (Yes/ No and state how)
Policy BR1 Promoting Sustainable Development	Policy itself will not lead to development.	None identified.	No LSE. This policy sets out criteria for new development to adhere to. This policy does not lead to development itself.
Policy BR2: Development Strategy	The location of the development is currently unknown, its implementation will be subject to a planning application	Seeking to deliver proportional growth during the plan period within a settlement boundary Increased traffic Increased demand on water abstraction Increase demand on sewerage treatment	LSE. The policy is seeking to deliver dwellings within defined settlement boundaries in Bridstow, Wilton, Buckcastle Hill, Bannutree and Claytons.
Policy BR3 Major Development within the Wye Valley AONB	The policy itself will not lead to development. This policy is to safeguard the natural landscape in the AONB.	None identified.	No LSE. This policy sets out criteria for new development to adhere to. This policy does not lead to the development itself.
Policy BR4 Conserving the Landscape and Scenic Beauty within the Wye Valley AONB	The policy itself will not lead to development. This policy is to safeguard natural landscape and scenic beauty in the AONB.	None identified.	No LSE. This policy sets out criteria for new development to adhere to. This policy does not lead to the development itself.
Policy BR5 Protecting Heritage Assets	The policy itself will not lead to development. This sets out to safeguard Heritage assets.	None identified.	No LSE. This policy sets out criteria for new development to adhere to. This policy does not lead to development itself.

Policy Number	Potential effect	In-combination effects	Likely Significant effect (Yes/ No and state how)
Policy BR6 Enhancement of the Natural Environment	Policy itself will not lead to development.	None identified.	No LSE. This policy sets out criteria to protect and enhance the natural environment. This policy does not lead to the development itself.
Policy BR7 Protection from Flood Risk	Policy itself will not lead to development.	None identified.	No LSE. This policy sets out criteria to protect development from flood risk. This policy does not lead to the development itself.
Policy BR8 Sewerage Infrastructure	Policy itself will not lead to development.	None identified.	No LSE. This policy sets out criteria for development to adhere to in regards to sewerage infrastructure. This policy does not lead to the development itself.
Policy BR9 Sustainable Design	Policy itself will not lead to development.	None identified.	No LSE. This policy sets out sustainable design criteria for new development to adhere to. This policy does not lead to the development itself.
Policy BR10 Housing Design and Appearance	Policy itself will not lead to development.	None identified.	No LSE. This policy sets out housing design criteria for new development to adhere to. This policy does not lead to the development itself.
Policy BR11 Highway Design Requirements	Policy itself will not lead to development.	None identified.	No LSE. This policy sets out criteria for highway design for new development. This policy does not lead to the development itself.
Policy BR12 Housing Development in Wilton and Bridstow	The housing development 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.	LSE. This site allocation could lead to significant effects on the water and environmental quality.

Policy Number	Potential effect	In-combination effects	Likely Significant effect (Yes/ No and state how)
Policy BR13 Housing Sites in Bridstow Village	The policy and site allocation could have a likely to have an impact on water quality.	Policy for housing sites in Bridstow, is in line with Core Strategy targets. Increase in vehicle traffic. Increased demand for water abstraction and sewage treatment.	LSE. This site allocation could lead to significant effects on the water and environmental quality.
Policy BR14 Housing Development within Buckcastle Hill Area of Special Character	The policy could have a likely to have an impact on water quality.	Policy for housing sites, is in line with Core Strategy targets. Increase in vehicle traffic. Increased demand for water abstraction and sewage treatment.	LSE. This site allocation could lead to significant effects on the water and environmental quality.
Policy BR15 Agricultural Diversification, Tourism and other Employment 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 BR16 Renewable and Low Carbon Energy	The development policy could have a likely to have an impact on water quality.	Policy for renewable energy development in line with Core Strategy. Increase in vehicle traffic. Increased demand for water abstraction and sewage treatment.	LSE. This policy for renewable energy schemes could lead to significant effects on the water and environmental quality.
Policy BR17 Polyunnel Proposals	The development policy could have a likely to have an impact on water quality.	Policy for polyunnel development in line with Core Strategy. Increase in vehicle traffic.	LSE. This policy for polyunnel schemes could lead to significant effects on the water and environmental quality.

Policy Number	Potential effect	In-combination effects	Likely Significant effect (Yes/ No and state how)
		Increased demand for water abstraction and sewage treatment.	
Policy BR18 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 in the neighbourhood area.	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.
Policy BR19 Protection of Local Green Space and Areas of Open Space	<p>Policy itself will not lead to development. This policy safeguards local green space and open space.</p> <p>Policy is seeking to enhance and or protect the natural environment in general</p>	This will have a positive effect	No LSE. This policy is seeking to avoid adverse effects on the River Wye SAC. The policy seeks to protect and enhance local greenspace and open spaces in the parish.
Policy BR20 High Speed Broadband and Telecommunications	The development policy could have a likely to have an impact on water quality.	<p>Criteria for for broadband and telecommunications development.</p> <p>Increase in vehicle traffic.</p> <p>Increased demand for water abstraction and sewage treatment.</p>	LSE. This policy for policy for broadband and telecommunications schemes could lead to significant effects on the water and environmental quality.

Appendix 4b

Appropriate Assessment policy assessment – Bridstow Neighbourhood Plan

Neighbourhood Plan Policy: BR2 Development Strategy

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

Possible Mitigation measures

Mitigation	Description
Main sewerage system	The neighbourhood area is partially served by mains drainage, Lower Cleeve WwTw in Ross on Wye. The areas of Buckcastle Hill, Claytons, Bridstow and Wilton. Therefore, the areas within the settlement boundaries and site allocations are covered by the Ross on Wye Lower Cleeve. The majority of the proportional growth will be targeted to areas where a foul and surface water management strategy will be required for any developments which needs to be agreed in writing by the Local Planning Authority.
WWTW	The proportional growth requirement is within the expected for the Ross-on-Wye Market area within the Core Strategy and agreed by Welsh Water. Welsh Water have and are continuing to include phosphate stripping in a number of WwTw across the county. This will have a positive impact on the catchment in general. Specific foul and water management strategies will be needed within all proposals which need to be agreed in writing by the Local Planning Authority.
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. This NMP cannot be relied upon at this stage.
Interim Phosphate Plan Stage 2	This document provides a range of potential mitigation solutions that could used within the parish. A set of recommendations are included to provide a robust solution to achieve nutrient neutral residential developments. This document has been available on the Councils website since March 2021 and can be found on the link below https://www.herefordshire.gov.uk/downloads/file/22211/interim-phosphate-delivery-plan-stage-2-non-technical-summary
Other - considerations	The River Wye runs along the eastern border of the parish. Policy BR6 Enhancement of Natural Environment seeks to conserve and protect and enhance natural habitats, biodiversity and the ecological network within the parish, including watercourses. Policy BR8 (Sewerage and Sewerage Infrastructure) supports development contributes towards remedial works to WwTw's to expedite any under capacity. The proportionate growth requirements within the Core Strategy, some of which have already been met by existing commitments.
In-combination policies	The policy does not grant permission or lead to development in itself. It is seeking to comply with the proportional growth requirements of the Core Strategy Policy RA2. A planning application will be required and any application will need to meet the requirements of Policy SD4.

	The policy criteria within Policy BR7(Protection from Flood Risk) includes the requirement for acceptable arrangements for the treatment of surface water disposal through the use of suitable sustainable drainage and wet systems. This ensures development not cause or increase surface water flooding or pollution. Policy SD4 required all developments to meet criteria to not undermine the water quality objectives of the SAC.
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Residual effects – Having taken the above mitigation measures into account, it is considered that there is the NDP would benefit for additional policy regarding the safeguarding of the SAC particularly around water quality. This could include a specific nutrient neutrality policy. Some of the proportional growth requirements for the parish have been met. Additional reference to the need for an agreed foul and surface water management strategy with the application would ensure the likely significant effects of the development plan policies have been removed. There are not residual outstanding effects.

Conclusion – The delineation of a settlement boundary within the plan does not directly lead to development. All infill sites within the boundary and housing within the ‘open countryside’ require a planning application. It is suggested that upon review if the plan included additional wording is added to the last paragraph of the policy to require foul and surface management strategy which demonstrates. If this was included then a conclusion of no likely significant effects would result with regards to the Bridstow NDP Policy BR2.

Neighbourhood Plan Policy: BR12 Housing Development in Wilton and Bridstow

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

Possible Mitigation measures

Mitigation	Description
Main sewerage system	The neighbourhood area is partially served by mains drainage, Lower Cleeve WwTw in Ross on Wye. The areas of Buckcastle Hill, Clatytons, Bridstow and Wilton. Therefore, the areas within the settlement boundaries and site allocations are covered by the Ross on Wye Lower Cleeve. The majority of the proportional growth will be targeted to areas where a foul and surface water management strategy will be required for any developments which needs to be agreed in writing by the Local Planning Authority.
WWTW	The proportional growth requirement is within the expected for the Ross-on-Wye Market area within the Core Strategy and agreed by Welsh Water. Welsh Water have and are continuing to include phosphate stripping in a number of WwTw across the county. This will have a positive impact on the catchment in general. Specific foul and water management strategies will be needed within all proposals which need to be agreed in writing by the Local Planning Authority.
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. This NMP cannot be relied upon at this stage.
Interim Phosphate Plan Stage 2	This document provides a range of potential mitigation solutions that could used within the parish. A set of recommendations are included to provide a robust solution to achieve nutrient neutral residential developments. This document has been available on the Councils website since March 2021 and can be found on the link below https://www.herefordshire.gov.uk/downloads/file/22211/interim-phosphate-delivery-plan-stage-2-non-technical-summary
Other considerations	The River Wye runs along the eastern border of the parish. Policy BR6 Enhancement of Natural Environment seeks to conserve and protect and enhance natural habitats, biodiversity and the ecological network within the parish, including watercourses. Policy BR8 (Sewerage and Sewerage Infrastructure) supports development contributes towards remedial works to WwTw's to expedite any under capacity. The proportionate growth requirements within the Core Strategy, some of which have already been met by existing commitments.
In-combination policies	The policy does not grant permission or lead to development in itself. It is seeking to comply with the proportional growth requirements of the Core Strategy Policy RA2. A planning application will be required and any application will need to meet the requirements of Policy SD4. The policy criteria within Policy BR7(Protection from Flood Risk) includes the requirement for acceptable arrangements for the treatment of surface

	water disposal through the use of suitable sustainable drainage and wet systems. This ensures development not cause or increase surface water flooding or pollution. Policy SD4 required all developments to meet criteria to not undermine the water quality objectives of the SAC.
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Residual effects – Having taken the above mitigation measures into account, it is considered that there is the NDP would benefit for additional policy regarding the safeguarding of the SAC particularly around water quality. This could include a specific nutrient neutrality policy. The proportional growth requirements for the parish have partially been met through planning applications. Additional reference to the need for an agreed foul and surface water management strategy with application would ensure the likely significant effects of the development plan policies have been removed. There are not residual outstanding effects.

Conclusion –the delineation of a settlement boundary and allocation of sites within the plan does not directly lead to development. All infill sites within the boundary and housing within the ‘open countryside’ require a planning application. It is suggested that additional wording is added to the last paragraph of this development policy to require foul and surface management strategy which demonstrates. If this was included then a conclusion of no likely significant effects would result with regards to the Bridstow NDP Policy BR12.

Neighbourhood Plan Policy: BR13 Housing Sites in Bridstow Village

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

Possible Mitigation measures

Mitigation	Description
Main sewerage system	The neighbourhood area is partially served by mains drainage, Lower Cleeve WwTw in Ross on Wye. The areas of Buckcastle Hill, Clatytons, Bridstow and Wilton. Therefore, the areas within the settlement boundaries and site allocations are covered by the Ross on Wye Lower Cleeve. The majority of the proportional growth will be targeted to areas where a foul and surface water management strategy will be required for any developments which needs to be agreed in writing by the Local Planning Authority.
WWTW	The proportional growth requirement is within the expected for the Ross-on-Wye Market area within the Core Strategy and agreed by Welsh Water. Welsh Water have and are continuing to include phosphate stripping in a number of WwTw across the county. This will have a positive impact on the catchment in general. Specific foul and water management strategies will be needed within all proposals which need to be agreed in writing by the Local Planning Authority.
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. This NMP cannot be relied upon at this stage.
Interim Phosphate Plan Stage 2	This document provides a range of potential mitigation solutions that could used within the parish. A set of recommendations are included to provide a robust solution to achieve nutrient neutral residential developments. This document has been available on the Councils website since March 2021 and can be found on the link below https://www.herefordshire.gov.uk/downloads/file/22211/interim-phosphate-delivery-plan-stage-2-non-technical-summary
Other considerations	The River Wye runs along the eastern border of the parish. Policy BR6 Enhancement of Natural Environment seeks to conserve and protect and enhance natural habitats, biodiversity and the ecological network within the parish, including watercourses. Policy BR8 (Sewerage and Sewerage Infrastructure) supports development contributes towards remedial works to WwTw's to expedite any under capacity. The proportionate growth requirements within the Core Strategy, some of which have already been met by existing commitments.
In-combination policies	The policy does not grant permission or lead to development in itself. It is seeking to comply with the proportional growth requirements of the Core Strategy Policy RA2. A planning application will be required and any application will need to meet the requirements of Policy SD4. The policy criteria within Policy BR7(Protection from Flood Risk) includes the requirement for acceptable arrangements for the treatment of surface

	water disposal through the use of suitable sustainable drainage and wet systems. This ensures development not cause or increase surface water flooding or pollution. Policy SD4 required all developments to meet criteria to not undermine the water quality objectives of the SAC.
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Residual effects – Having taken the above mitigation measures into account, it is considered that there is the NDP would benefit for additional policy regarding the safeguarding of the SAC particularly around water quality. Additional reference to the need for an agreed foul and surface water management strategy with the application would ensure the likely significant effects of the development plan policies have been removed. There are not residual outstanding effects.

Conclusion – the allocation of this site within the plan does not directly lead to development. All site allocations require a planning application which demonstrates that the Policy SD4 and Policy BR6, BR7 and BR8 have been met. It is suggested that additional wording is added to the criteria of the policy to require foul and surface management strategy and reference to the Interim Phosphate Plan stage 2 in the reasoned justification. If this was included then a conclusion of no likely significant effects would result with regards to the Bridstow NDP Policy BR13.

Neighbourhood Plan Policy: BR14 Housing Development within Buckcastle Hill Area of Special Character

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

Possible Mitigation measures

Mitigation	Description
Main sewerage system	The neighbourhood area is partially served by mains drainage, Lower Cleeve WwTw in Ross on Wye. The areas of Buckcastle Hill, Clatytons, Bridstow and Wilton. Therefore, the areas within the settlement boundaries and site allocations are covered by the Ross on Wye Lower Cleeve. The majority of the proportional growth will be targeted to areas where a foul and surface water management strategy will be required for any developments which needs to be agreed in writing by the Local Planning Authority.
WWTW	The proportional growth requirement is within the expected for the Ross-on-Wye Market area within the Core Strategy and agreed by Welsh Water. Welsh Water have and are continuing to include phosphate stripping in a number of WwTw across the county. This will have a positive impact on the catchment in general. Specific foul and water management strategies will be needed within all proposals which need to be agreed in writing by the Local Planning Authority.
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. This NMP cannot be relied upon at this stage.
Interim Phosphate Plan Stage 2	This document provides a range of potential mitigation solutions that could used within the parish. A set of recommendations are included to provide a robust solution to achieve nutrient neutral residential developments. This document has been available on the Councils website since March 2021 and can be found on the link below https://www.herefordshire.gov.uk/downloads/file/22211/interim-phosphate-delivery-plan-stage-2-non-technical-summary
Other considerations	The River Wye runs along the eastern border of the parish. Policy BR6 Enhancement of Natural Environment seeks to conserve and protect and enhance natural habitats, biodiversity and the ecological network within the parish, including watercourses. Policy BR8 (Sewerage and Sewerage Infrastructure) supports development contributes towards remedial works to WwTw's to expedite any under capacity. The proportionate growth requirements within the Core Strategy, some of which have already been met by existing commitments.
In-combination policies	The policy does not grant permission or lead to development in itself. It is seeking to comply with the proportional growth requirements of the Core Strategy Policy RA2. A planning application will be required and any application will need to meet the requirements of Policy SD4. The policy criteria within Policy BR7(Protection from Flood Risk) includes the requirement for acceptable arrangements for the treatment of surface

	water disposal through the use of suitable sustainable drainage and wet systems. This ensures development not cause or increase surface water flooding or pollution. Policy SD4 required all developments to meet criteria to not undermine the water quality objectives of the SAC.
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Residual effects – Having taken the above mitigation measures into account, it is considered that there is the NDP would benefit for additional policy regarding the safeguarding of the SAC particularly around water quality. Additional reference to the need for an agreed foul and surface water management strategy with application would ensure the likely significant effects of the development plan policies have been removed. There are not residual outstanding effects.

Conclusion – the delineation of a settlement boundary and allocation of sites within the plan does not directly lead to development. All infill sites within the boundary and housing within the ‘open countryside’ require a planning application. It is suggested that additional wording is added to the last paragraph of this development policy to require foul and surface management strategy which demonstrates. If this was included then a conclusion of no likely significant effects would result with regards to the Bridstow NDP Policy BR14.

Neighbourhood Plan Policy: BR16 Renewable and Low Carbon Energy

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

Possible Mitigation measures

Mitigation	Description
Main sewerage system	The neighbourhood area is partially served by mains drainage, Lower Cleeve WwTw in Ross on Wye. The areas of Buckcastle Hill, Clatytons, Bridstow and Wilton. Therefore, the areas within the settlement boundaries and site allocations are covered by the Ross on Wye Lower Cleeve. The majority of the proportional growth will be targeted to areas where a foul and surface water management strategy will be required for any developments which needs to be agreed in writing by the Local Planning Authority.
WWTW	The proportional growth requirement is within the expected for the Ross-on-Wye Market area within the Core Strategy and agreed by Welsh Water. Welsh Water have and are continuing to include phosphate stripping in a number of WwTw across the county. This will have a positive impact on the catchment in general. Specific foul and water management strategies will be needed within all proposals which need to be agreed in writing by the Local Planning Authority.
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. This NMP cannot be relied upon at this stage.
Interim Phosphate Plan Stage 2	This document provides a range of potential mitigation solutions that could used within the parish. A set of recommendations are included to provide a robust solution to achieve nutrient neutral residential developments. This document has been available on the Councils website since March 2021 and can be found on the link below https://www.herefordshire.gov.uk/downloads/file/22211/interim-phosphate-delivery-plan-stage-2-non-technical-summary
Other considerations	The River Wye runs along the eastern border of the parish. Policy BR6 Enhancement of Natural Environment seeks to conserve and protect and enhance natural habitats, biodiversity and the ecological network within the parish, including watercourses. Policy BR8 (Sewerage and Sewerage Infrastructure) supports development contributes towards remedial works to WwTw's to expedite any under capacity. The proportionate growth requirements within the Core Strategy, some of which have already been met by existing commitments.
In-combination policies	The policy does not grant permission or lead to development in itself. It is seeking to comply with the proportional growth requirements of the Core Strategy Policy RA2. A planning application will be required and any application will need to meet the requirements of Policy SD4. The policy criteria within Policy BR7(Protection from Flood Risk) includes the requirement for acceptable arrangements for the treatment of surface

	water disposal through the use of suitable sustainable drainage and wet systems. This ensures development not cause or increase surface water flooding or pollution. Policy SD4 required all developments to meet criteria to not undermine the water quality objectives of the SAC.
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Residual effects – Having taken the above mitigation measures into account, it is considered that there is the NDP would benefit for additional policy regarding the safeguarding of the SAC particularly around water quality. Additional reference to the need for an agreed foul and surface water management strategy with application would ensure the likely significant effects of the development plan policies have been removed. There are not residual outstanding effects.

Conclusion – All sites developing renewable energy and low carbon schemes require a planning application. The criteria for polytunnels 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 BR6,7,8 have been met, and taking into account the mitigation measures highlighted above it is concluded that no likely significant effects would result from Policy BR16.

Neighbourhood Plan Policy: BR17 Polytunnel Proposals

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

Possible Mitigation measures

Mitigation	Description
Main sewerage system	The neighbourhood area is partially served by mains drainage, Lower Cleeve WwTw in Ross on Wye. The areas of Buckcastle Hill, Clatytons, Bridstow and Wilton. Therefore, the areas within the settlement boundaries and site allocations are covered by the Ross on Wye Lower Cleeve. The majority of the proportional growth will be targeted to areas where a foul and surface water management strategy will be required for any developments which needs to be agreed in writing by the Local Planning Authority.
WWTW	The proportional growth requirement is within the expected for the Ross-on-Wye Market area within the Core Strategy and agreed by Welsh Water. Welsh Water have and are continuing to include phosphate stripping in a number of WwTw across the county. This will have a positive impact on the catchment in general. Specific foul and water management strategies will be needed within all proposals which need to be agreed in writing by the Local Planning Authority.
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. This NMP cannot be relied upon at this stage.
Interim Phosphate Plan Stage 2	This document provides a range of potential mitigation solutions that could used within the parish. A set of recommendations are included to provide a robust solution to achieve nutrient neutral residential developments. This document has been available on the Councils website since March 2021 and can be found on the link below https://www.herefordshire.gov.uk/downloads/file/22211/interim-phosphate-delivery-plan-stage-2-non-technical-summary
Other considerations	The River Wye runs along the eastern border of the parish. Policy BR6 Enhancement of Natural Environment seeks to conserve and protect and enhance natural habitats, biodiversity and the ecological network within the parish, including watercourses. Policy BR8 (Sewerage and Sewerage Infrastructure) supports development contributes towards remedial works to WwTw's to expedite any under capacity. The proportionate growth requirements within the Core Strategy, some of which have already been met by existing commitments.
In-combination policies	The policy does not grant permission or lead to development in itself. It is seeking to comply with the proportional growth requirements of the Core Strategy Policy RA2. A planning application will be required and any application will need to meet the requirements of Policy SD4. The policy criteria within Policy BR7(Protection from Flood Risk) includes the requirement for acceptable arrangements for the treatment of surface

	water disposal through the use of suitable sustainable drainage and wet systems. This ensures development not cause or increase surface water flooding or pollution. Policy SD4 required all developments to meet criteria to not undermine the water quality objectives of the SAC.
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Residual effects – Having taken the above mitigation measures into account, it is considered that there is the NDP would benefit for additional policy regarding the safeguarding of the SAC particularly around water quality. Additional reference to the need for an agreed foul and surface water management strategy with application would ensure the likely significant effects of the development plan policies have been removed. There are not residual outstanding effects.

Conclusion –All sites developing polytunnels require a planning application. The criteria for polytunnels 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 BR6,7,8 have been met, and taking into account the mitigation measures highlighted above it is concluded that no likely significant effects would result from Policy BR17.

Neighbourhood Plan Policy: BR20 High Speed Broadband and Telecommunications

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

Possible Mitigation measures

Mitigation	Description
Main sewerage system	The neighbourhood area is partially served by mains drainage, Lower Cleeve WwTw in Ross on Wye. The areas of Buckcastle Hill, Claytons, Bridstow and Wilton. Therefore, the areas within the settlement boundaries and site allocations are covered by the Ross on Wye Lower Cleeve. The majority of the proportional growth will be targeted to areas where a foul and surface water management strategy will be required for any developments which needs to be agreed in writing by the Local Planning Authority.
WWTW	The proportional growth requirement is within the expected for the Ross-on-Wye Market area within the Core Strategy and agreed by Welsh Water. Welsh Water have and are continuing to include phosphate stripping in a number of WwTw across the county. This will have a positive impact on the catchment in general. Specific foul and water management strategies will be needed within all proposals which need to be agreed in writing by the Local Planning Authority.
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. This NMP cannot be relied upon at this stage.
Interim Phosphate Plan Stage 2	This document provides a range of potential mitigation solutions that could used within the parish. A set of recommendations are included to provide a robust solution to achieve nutrient neutral residential developments. This document has been available on the Councils website since March 2021 and can be found on the link below https://www.herefordshire.gov.uk/downloads/file/22211/interim-phosphate-delivery-plan-stage-2-non-technical-summary
Other considerations	The River Wye runs along the eastern border of the parish. Policy BR6 Enhancement of Natural Environment seeks to conserve and protect and enhance natural habitats, biodiversity and the ecological network within the parish, including watercourses. Policy BR8 (Sewerage and Sewerage Infrastructure) supports development contributes towards remedial works to WwTw's to expedite any under capacity. The proportionate growth requirements within the Core Strategy, some of which have already been met by existing commitments.
In-combination policies	The policy does not grant permission or lead to development in itself. It is seeking to comply with the proportional growth requirements of the Core Strategy Policy RA2. A planning application will be required and any application will need to meet the requirements of Policy SD4. The policy criteria within Policy BR7(Protection from Flood Risk) includes the requirement for acceptable arrangements for the treatment of surface

	water disposal through the use of suitable sustainable drainage and wet systems. This ensures development not cause or increase surface water flooding or pollution. Policy SD4 required all developments to meet criteria to not undermine the water quality objectives of the SAC.
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Residual effects – Having taken the above mitigation measures into account, it is considered that there is the NDP would benefit for additional policy regarding the safeguarding of the SAC particularly around water quality. Additional reference to the need for an agreed foul and surface water management strategy with application would ensure the likely significant effects of the development plan policies have been removed. There are not residual outstanding effects.

Conclusion – All sites developing broadband and telecommunications require a planning application. The criteria for broadband and telecommunications 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 BR6,7,8 have been met, and taking into account the mitigation measures highlighted above it is concluded that no likely significant effects would result from Policy BR17.

Appendix 5

Bridstow Modifications following examination – December 2021

Policy	Modification recommended	Justification
Cover page	Revise the date of the Plan to “2020 – 2031” and show on the front cover of the BNDP.	Interests of accuracy and clarity.
Modification 1- Objectives	Revise Objective 2b) to read “ <i>Avoiding development where this would result in significant danger through conflicts between vehicles an/c deleted pedestrians.</i> ” Delete Objectives 3b) and 3c). Add the following new objective after 4c): “ <i>Avoiding noise sensitive development on sites with unacceptable levels of traffic noise close to the trunk roads.</i> ” Include a paragraph in the Issues section to explain the background to concerns about the impact of traffic noise from the trunk roads and refer to the decision taken on sites with unacceptable levels of highway noise.	Interests of accuracy and clarity. Conformity with NPPF para 174. Address concerns raised at consultation
Modification 2-Policy BR1	Delete “high-level” from the first paragraph of the policy. Delete the second sentence of point a) “Major development ...satisfactory degree.”	Removal of superfluous criteria. Interests of conformity to para 177 NPPF.
Modification 3-Policy BR2	In criterion b) replace “Development boundaries” with “ <i>Settlement boundaries</i> ”. In criterion c) delete “or development” from line 1. Replace “development boundaries” with “settlement boundaries” elsewhere in the supporting text of the BNDP.	Removal of superfluous criteria. Conformity to national and strategic policy.
Modification 4-Policy BR4	Delete “All” from the first line of the policy. Revise criterion d) to read “Development within the <i>Green Gap defined on the Policies Map</i> between Bridstow and Wilton that will visually diminish the openness of the Green Gap when viewed from publicly accessible locations, except for <i>that reasonably required for agriculture and forestry purposes or to mitigate flood risk, will not be supported</i> ”.	Interests of accuracy and clarity. In regard to national policy.
Modification 5-Policy BR5	Revise the first paragraph to read: “ <i>....should be protected, conserved and where possible enhanced through:</i> ” Revise point a) to read: “Developments <i>that may result in substantial harm or loss of the Scheduled Ancient Monuments and Grade I and II* Listed Buildings at Wilton Castle and the house attached, Wilton Bridge and Sundial, Churchyard Cross at St Bridget’s Church, St Bridget’s Church and their settings should be wholly exceptional and will require clear and convincing justification.</i> ” Delete points b), c) and g). Revise point d) to read “ <i>.....that conserves or enhances....</i> ” Revise the second sentence of point h) to read: “ <i>.....New development associated with historic farmsteads should respect the historic form of the farmstead as demonstrated through thorough</i> ”	Interests of clarity. Conformity to national and strategic policy.

	<p>research of historic documents to <i>secure a design of exceptional quality.</i>"</p> <p>Additional text may be added to the justification to reference the sections of the NPPF and Core Strategy policies to address those subjects that are to be deleted from the policy</p>	
Modification 6- Policies Map/ Diagram	Show the ecological corridors along the River Wye, Wells Brook and the tributary to that Brook on the Policies Map or on a diagram within the text of the BNDP.	Conformity with NPPF and Core Strategy.
Modification 7-Para 6.9	Revise paragraph 6.9 to read: "This policy is considered consistent with Herefordshire Core Strategy Policy SD4. <i>The Ross Lower Cleeve WwTWs serves a wide area comprising Ross-on-Wye and some surrounding villages, including those within Bridstow Parish. Dwr Cymru/Welsh Water recently completed a reinforcement scheme at this WwTW. However, the River Wye is a Special Area of Conservation requiring a high priority to be given to maintaining good water quality. Consequently, should there be a future shortfall in WwTWs capacity, this policy maintains a precautionary approach to ensure appropriate protection.</i> "	Removal of superfluous criteria.
Modification 8- Policy BR9	<p>Revise the first paragraph second sentence to read "...which <i>could</i> include:"</p> <p>Point a) delete "such as photovoltaic panels".</p> <p>Point b) replace "such as through" with "<i>including</i>".</p> <p>Revise point g) to read "...and reducing <i>construction</i> waste." Revise point h) to read: ".....they should be of a high quality and fit sensitively within the street scene and landscape and reflect locally distinctive features to maintain the area's cohesive character."</p> <p>Add a new point: "<i>For proposals requiring vehicle parking, provision of electric vehicle charging points at an appropriate level, which should be for each dwelling in residential developments, and for other forms of development to suit the needs of the expected level of traffic generation.</i>"</p> <p>Add new point: "<i>Locating noise sensitive development, including housing, in locations that are not subject to unacceptable levels of noise from highways and ensuring effective measures are taken to ensure that ambient noise levels both indoors and outdoors are acceptable.</i>"</p> <p>Revise paragraph 6.11 to include examples of renewable energy infrastructure and sustainable drainage systems that may be employed. Additional text may be added to the justification to explain how these new criteria are to be applied.</p>	<p>Interests of accuracy and clarity.</p> <p>Introduce flexibility to the policy.</p> <p>In conformity to the NPPF.</p>

Modification 9- Policy BR10	Delete point b). Revise the second sentence of paragraph 6.12 to read “Core Strategy Policy <i>SD1</i> ” and delete the last sentence of the paragraph.	Interests of accuracy and clarity.
Modification 10-Policy BR11	Delete Policy BR11 and place it in an Appendix or separate section of the Plan headed Community Actions.	This is a community action and not a planning policy.
Modification 11-Policy BR12	Revise Policy BR12 as follows: Revise criterion b) to read: “Adequate provision of off-street parking <i>for residents and visitors.</i> ” Revise criterion c) to read: “Proposals <i>would</i> not lead to” Revise criterion d) to read: “The nature of the development <i>would</i> not lead to”	Concerns of deliverability.
Modification 12- Policy BR13 and 14	Amalgamate Policies BR13 and BR14 to read: “ <i>Settlement boundaries have been defined for Bannutree, Buckcastle Hill, Claytons and Wilton on the Policies Maps. Housing development will be supported within the settlement boundaries that satisfy other policies in the development plan.</i> ” Replace the term “development boundary” with “ <i>settlement boundary</i> ” in the justification. Correct the typographical error in paragraph 8.11 second sentence “ <i>albethey</i> ”.	Interests of clarity and consistency. Conformity with NPPF and Core Strategy. Removal of superfluous information.
Modification 13- Policy BR15	Show the site numbers for Policy BR15 on the Policies Maps. Revise paragraph 8.19 second bullet to read “.....and trees <i>should be protected by the use of planning conditions</i> or Tree Preservation Orders, where appropriate. “ Replace the fifth bullet point of paragraph 8.19 with: “ <i>Care will be needed to ensure the location of dwellings, landscaping and building design reflect the built and landscape character of this part of the settlement in accordance with Policy BR10 a) and b).</i> ” Delete the sixth bullet point of paragraph 8.20. Delete the fourth bullet point of paragraph 8.21. Revise the ninth bullet point of paragraph 8.21 to read: “.....the dwelling to the <i>south east</i> of the site....” Publish an Addendum to the Sites Assessment Report to include the objections from HC’s Environmental Health section to sites along the A40 and A49 on the grounds of noise and pollution. Revise paragraph 2.21 to explain the objections to site W2 at Wilton.	In accordance with the guidance set out in the NPPG. Interests of accuracy and clarity.
Modification 14- Policy BR16	Revise the second sentence of the first paragraph of the policy to read: “Within this area, <i>very low density</i> housing development will be supported where it retains or enhances the character <i>of the area and</i> where it meets the following requirements:”	Interests of clarity and accuracy. Conformity to national policy.

	Include a definition of “very low density” development in the glossary. Delete “including through the use of Tree Preservation Orders in relation to trees” from criterion e).	
Modification 15- Policy BR17	Revise criterion d) to read “..... <i>and should avoid the loss of best and most versatile agricultural land, where possible.</i> ” Revise criterion h) to read “..... <i>enterprise can be fully mitigated.</i> ” Delete “and where they cannot, permission will be refused.”	Conform to national policy NPPF para 84-85 and planning law.
Modification 16- Policy BR18	Revise the last paragraph of the policy to read: “.....will not be supported except in exceptional circumstances <i>as set out in the NPPF and Policy BR3.</i> ” Revise paragraph 9.5 to read: “.....Herefordshire Council’s Renewable Energy Study indicates that the Parish falls outside of the resource area for large and medium scale wind energy <i>although it indicates that the Wye Valley AONB may not be suitable for wind turbines, it could still benefit from other technologies. That study defines large and medium sized wind turbines although for the purposes of this policy these would be turbines larger than 100kw. Turbines at or below this figure would normally be those used by individual homeowners or farmers for on-site electricity consumption. Of the other technologies, there may be potential for biomass and solar energy production. In determining whether the scale of buildings and infrastructure associated with these would amount to major development, proposals would need to be comply with BNDP Policies BR3 and BR17. There is no scope for hydro-electricity within the parish. Heat pumps are generally at the individual property scale.....</i> ”	Conformity to para NPPF para 177. Conformity to CS strategic policy SD2. Interests of clarity and accuracy.
Modification 17-Policies Maps	Show the location of the community facilities and their curtilages named in Policy BR20 on the Policies Map.	Interests of consistency and clarity.
Modification 18- Policy BR22	Delete Policy BR22. Revise the heading by deleting “Policy BR22”. Retain the justification.	Removal of superfluous policy.
Modification 19- Section 11	Revise Section 11 Delivering the Plan as follows: Delete the second and third sentences of paragraph 11.2 “To duplicate these.....held within Herefordshire Council.”	Part of this is a community action not a planning policy. Interests of clarity.