

Appropriate Assessment

Report for:

Titley & District Group Neighbourhood Area

December 2022



Initial Habitat Regulations Assessment and Strategic Environmental Assessment Screening Notification

The Neighbourhood Planning (General) (Amendment) Regulations 2015 (Reg. 32)

Conservation of Habitats and Species Regulations 2010 (d)

Neighbourhood Area:	Titley Group Neighbourhood Area
Parish Council:	Titley & District Group Parish Council
Neighbourhood Area Designation Date:	14 July 2016

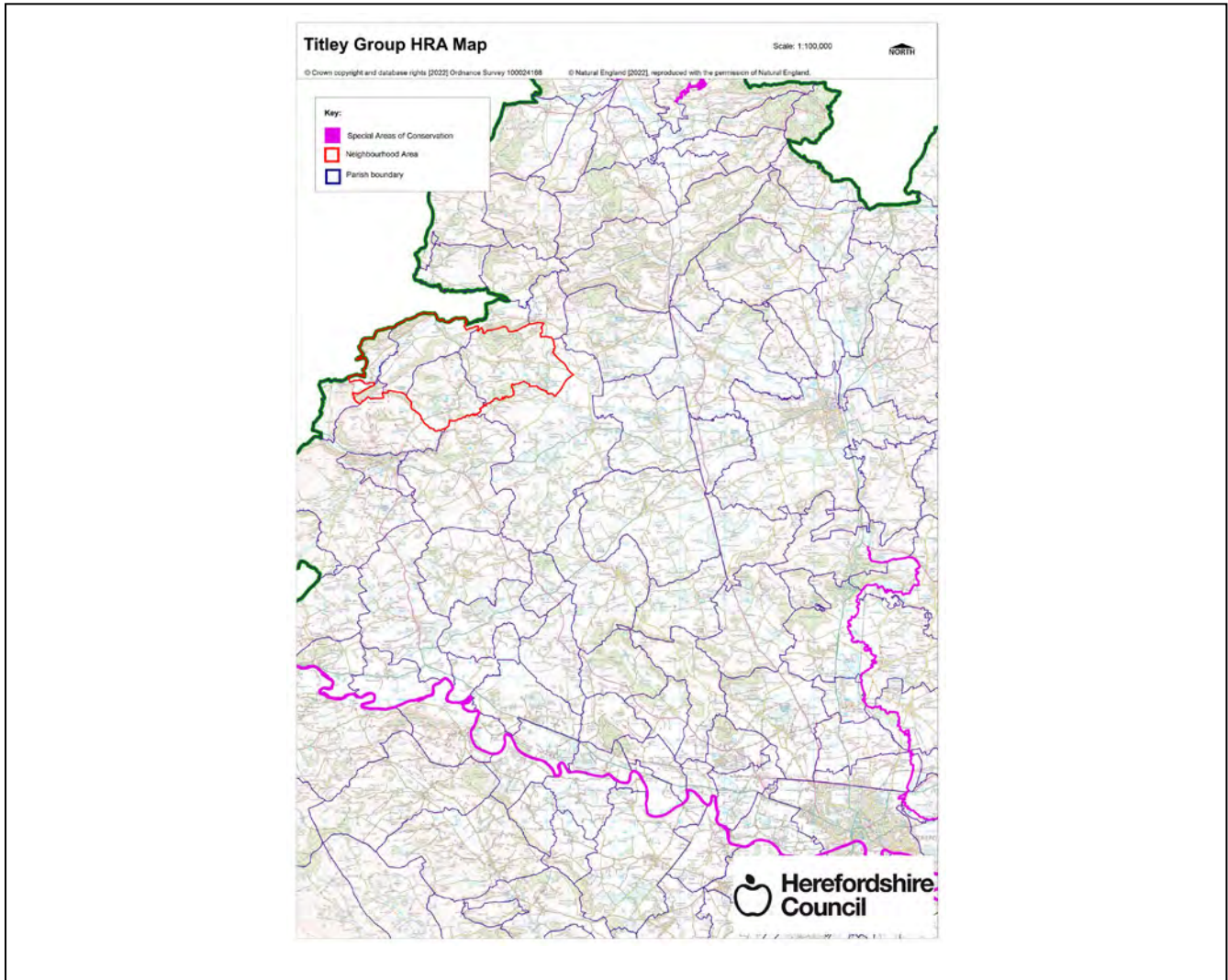
Introduction

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)



River Wye (including the River Lugg) Special Area of Conservation (SAC):

Does the Neighbourhood Area have the River Wye (including the River Lugg) in or next to its boundary?	N	The River Wye (including the Lugg) SAC is 15.6km away from the Neighbourhood Area.
Is the Neighbourhood Area in the hydrological catchment of the River Wye SAC?	N	The Neighbourhood Area is not within the River Wye Hydrological Catchment Area.
Is the Neighbourhood Area in the River Lugg hydrological catchment area?	Y	The Neighbourhood Area is within the hydrological catchments of the River Lugg and also the River Arrow (to Lugg).
If yes above, does the Neighbourhood Area have mains drainage to deal with foul sewage?	Y	There is mains drainage at Titley.

Downton Gorge SAC:

Is the Neighbourhood Area within 10km of Downton Gorge SAC?	N	Downton Gorge is 11.75km away from the Neighbourhood Area.
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River Clun SAC:

Does the River Clun border the Neighbourhood Area	N	The River Clun SAC does not border the Neighbourhood Area.
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Wye Valley & Forest of Dean Bat Sites SAC:

Is the Neighbourhood Area within 10km of any of the individual sites that make up the Wye Valley & Forest of Dean Bat Sites?	N	Wye Valley and Forest of Dean Bat Sites are 48.5km away from the Neighbourhood Area.
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Wye Valley Woodlands SAC:

Is the Neighbourhood Area within 10km of any of the individual sites that make up the Wye Valley Woodlands Site?	N	Wye Valley Woodlands are 47.4km away from the Neighbourhood Area.
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HRA Conclusion:

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

European Site

(List only those which are relevant)

River Wye (including the River Lugg) SAC

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

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

SEA features	Within Neighbourhood Area		Bordering Neighbourhood Area	
	Total number	Name(s)	Total number	Name(s)
Ancient Woodland	22	Knill Wood; Rodd Wood; Butcher Wood; Wychmoor Wood; Stocking Wood; 2 x Unnamed; Combe and Brand Hill Woods; Lanes Wood; Bosley Field Coppice; Godens Wood; The Grove Copse; Stocklow Cross Wood; Park Wood; Napshaw Coppice; Mowley Wood 2; Birch Coppice; Smith Bank Wood; Orles; Little Coppice;	27	Park Wood; Lawn Coppice; Stocklow Heys Wood; Ravensmere Wood; Ashbed x 2 Vallet Coppice; 6 x Unnamed; Butts Wood; Lyonshall Park Wood; Piers Grove Wood; Slade Coppice, Mins Rough; Quarry Wood, Gorsty Piece; Coppice; Holywell Wood; Bradnor Wood Downsmoor Wood; Manns Wood; Stocking Wood 1; Chaff Wood;

SEA features	Within Neighbourhood Area		Bordering Neighbourhood Area	
	Total number	Name(s)	Total number	Name(s)
		Cave Wood; Kennel Wood.		Rough Grove Coppice; Rise Coppice.
Areas of Outstanding Natural Beauty	0	-	0	-
Conservation Areas	0	-	0	-
Flood Areas	There are Flood Zones in the south and north west of the Neighbourhood Area.			
Geoparks	0	-	0	-
Listed Buildings	There are numerous listed buildings throughout the Neighbourhood Area.			
Local Geological Sites	2	Stansbatch, Staunton on Arrow; Flintsham Kettle.	4	Byton Meanders; Shobdon Drumlins; Barton Farm, Kington; Kinsham Gorge.
Local Wildlife Sites	17	Knill Wood, Hazel Point and Nash Wood; Land at Nash; Land near Nash Court; Hindwell Brook; Land near Little Brampton; Pond at Knill; Little Brampton and Scar; Land adjacent to Wychmoor Wood; Land adjacent to Bradleys Cottage; Bircher Wood; Field near Lower Tan House; Mowley and Grove Wood;	19	Land at Lower Harpton; Bradnor Hill and Holly Wood; Rushock Common; Tinkers Wood; Land at Rushock Farm; Lyonshall Park Wood; Land at Mill Farm; Land at Bullocks Mill Piers Grove Wood and adjoining field; Land at Rodds Farm; Disused railway, Kington to Leominster; Moseley Common;

SEA features	Within Neighbourhood Area		Bordering Neighbourhood Area	
	Total number	Name(s)	Total number	Name(s)
		River Arrow; Pools near Titley; Pool near Shawl Farm; Land near Hunton Bridge; Herrock Hill.		Land adjacent to Moseley Common; Shobdon Pools; Marsh Covert; Byton and Combe Moors; Land at Combe Moor; River Lugg; Woodlands along River Lugg.
Mineral Reserves	2	Rodd, Nash & Little Brampton x 2.	0	-
National Nature Reserve	0	-	0	-
Nature Trails	3	Offa's Dyke; Mortimers Trail; Herefordshire Trail.	0	-
Registered Parks and Gardens	1	Eywood.	2	Shobdon; Hergest Croft.
Scheduled Ancient Monuments	7	Wapley Hill large multivallate hillfort and pillow mounds 150m north of Warren House; Motte south west of the church; North Herefordshire Rowe Ditch; Offas Dyke: The section extending 165yds (150m) north from Berry Wood; Offas Dyke: The section south of Riddings Brook on Herrock Hill; Churchyard cross in St Michael's Churchyard;	7	Motte Castle 300m north east of Combe House; Bowl Barrow 550m north east of Milton Cross; Bowl Barrow 490m south east of Milton Cross; Bowl Barrow 460m south east of Milton Cross; Offas Dyke: Section extending 300yds (270m) crossing the railway west of Titley Junction;

SEA features	Within Neighbourhood Area			Bordering Neighbourhood Area		
	Total number	Name(s)	SSSI Status	Total number	Name(s)	SSSI Status
		Offas Dyke: Rushock Hill section, extending 1630yds (1490m) east to Kennel Wood.			Bowl Barrow 445m south west of Lower Court; Bowl Barrow 460m south of Lower Court.	
Sites of Importance in Nature Conservation	0	-		0	-	
Special Areas of Conservation	0	-		0	-	
Unregistered parks and gardens	2	Titley Court; Staunton Park.		8	Court Of Noke; Lyonshall Park; The Whittern; Castle Weir; Ridgebourne; Kinsham Court; Bryan's Ground; Moor Court, Pembridge.	
			SSSI Status			SSSI Status
Sites of Special Scientific Interest (SSSI)	1	Flintsham and Titley Pools.	Favourable.	4	Byton and Combe Moors; River Lugg; Bradnor Hill Quarry;	Unfavourable No Change, Unfavourable Recovering; Unfavourable Recovering, Unfavourable Declining; Favourable;

SEA features	Within Neighbourhood Area			Bordering Neighbourhood Area		
	Total number	Name(s)		Total number	Name(s)	
					Moseley Common Pembridge.	Favourable.

Decision Notification:

The initial screening highlights that the Neighbourhood Development Plan for the Titley Group Neighbourhood Area will require further environmental assessment for Habitats Regulations Assessment and Strategic Environmental Assessment.

Assessment date: 4 March 2022

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. 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.”

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 1

Titley and District Group Neighbourhood Plan

Appropriate Assessment

Executive Summary

- 1 Introduction
 - 2 Requirements for the Habitat Regulation Assessment and Appropriate Assessment Consultation responses to date
 - 3 Stage 2 - Appropriate Assessment
 - 4 Scoping
 - 5 The Titley and District Group Neighbourhood Plan
 - 6 Assessing the in-combination impacts
 - 7 Mitigation Measures
 - 8 Summary findings
 - 9 Consultation
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- Appendix 1 Initial screening report and European Site characteristics
Appendix 2 Consultation responses to screening
Appendix 3 Policy Assessment matrix
Appendix 4 Consultation responses to Reg14 AA
Appendix 5 Policy matrix for amended policies

Executive summary

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

A previous Habitat Regulation Assessment has been undertaken on the previous iterations of the Titley and District Group Neighbourhood Plan dated January 2020, however recent advice and responses from Natural England is indicating that a Stage 2 Appropriate Assessment is required for all future NDPs within the catchment.

This report addresses the Appropriate Assessment stage; outlines the task undertaken, the findings and recommendations to support the Titley and District Group Neighbourhood Plan through to adoption.

The initial Screening report February 2017 found that the Neighbourhood Area is within the hydrological catchment of the River Wye (including the River Lugg) SAC. Therefore a full screening assessment is required.

The majority of the policies within the Titley and District Group NDP do not have site allocations but have criteria to support development. They would all require a further planning application.

There are 2 site allocations that have also been assessed. These are Land at Titley Farm and Small sites at Staunton-on-Arrow. It should be borne in mind that site allocations do not grant planning permission and all site allocations will be subject to a more detailed assessment at planning application stage.

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

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

The results of this Appropriate Assessment indicate that there will no adverse effects on the integrity of the River Wye (including River Lugg) 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. This NDP has been identified as requiring AA due to the neighbourhood area being within the hydrological catchment of the River Lugg.
- 1.2 A previous Habitat Regulation Assessment has been undertaken in January 2020 on the Neighbourhood Plan April 2019 and March 2020 versions, however recent advice and responses from Natural England is indicating that a Stage 2 Appropriate Assessment is required on any future versions of the NDP. The first Titley Group NDP failed at referendum stage and the version of the assessed within this report is the August 2022 Regulation 14 Titley Group NDP,
- 1.3 This report addresses the Appropriate Assessment stage; outlines the task undertaken, the findings and recommendations to support the Titley and District Group Neighbourhood Plan through to adoption.
- 1.4 Titley and District Group Parish Council has produced Neighbourhood Plan for Titley Group, in order to set out the vision, objective and policies for development within the area up to 2031. This Neighbourhood Plan will support the policies within the adopted Herefordshire Core Strategy and if adopted form part of the Herefordshire Development Plan. The Neighbourhood Plan is current at submission stage.
- 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, Titley and District Group Parish Council is required by law to carry out an assessment known as "Habitats Regulations Assessment". It is also a requirement in Regulation 32 schedule 2 of the Neighbourhood Planning Regulations 2012.

- 2.2 Herefordshire Council is aware of the recent judgment (People over Wind, Peter Sweetman vs Coillte). The Court of Justice of the European Union (CJEU) ruled that the Habitats Directive must be interpreted as meaning that mitigation measures should be assessed within the framework of an Appropriate Assessment and that it is not permissible to take account of measures intended to avoid or reduce the harmful effects of the plan on a European site at the screening stage. The initial screening was undertaken in 2018 and concluded that a full HRA would be required.
- 2.3 The Co-operation Mobilisation (The Dutch case) ruling will also have an impact on Herefordshire in the areas within the catchment of the River Lugg. As this Neighbourhood Area is within the River Lugg catchment area and therefore there is a requirement for a Stage 2 Appropriate Assessment to be undertaken.
- 2.4 The Ministerial Statement (20 July 2022) and subsequent advice issued by the Department for Levelling Up, Housing and Communities (21 July 2022) regarding Nutrient Neutrality has been taken into account within this report.

3 Stage 2 – Appropriate Assessment

- 3.1 As highlighted above the Titley and District Group Neighbourhood Plan is required to be subject to a Stage 2 Appropriate Assessment as it falls within the River Lugg catchment area.
- 3.2 The screening in 2018 identified that the plan may have potential impacts and effects on the following European sites:
- River Wye (including the River Lugg) SAC
- 3.3 The map below shows the Titley and District Group Neighbourhood Area in relation to the European Sites:



3.4 Previous Habitat Regulation Assessment have been undertaken (Draft Habitats Regulations Assessment November 2018, Habitats Regulations Assessment report May 2019, Habitats Regulations Assessment January 2020) whilst the initial neighbourhood plan was in production. Consultation has taken place on each iteration of the report and these can be seen in Appendix 2. Recent advice and responses have indicated that further Appropriate Assessment work is required specifically within the River Lugg catchment area to consider the impact of any Neighbourhood Plan on water quality within the catchment.

3.5 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 scoping report (February 2017) found that the Neighbourhood Area is within the hydrological catchment of the River Wye (including the River Lugg) SAC. Therefore a full screening assessment is required.

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

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

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

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, 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 can't be relied upon or are uncertain. The neighbourhood plan being assessed here is within the Lugg 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.
- 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 Upper Wye (at Carrots Pool, Hereford) it is within target at 0.01mg/l against the target of 0.03mg/l and within the Lower Wye (at Holme Lacy) it is 0.03mg/l against the target of 0.03mg/l. The sewerage treatment works within the Upper and Lower Wye are also reporting 100% compliance with their phosphate limits.

5 Description of the Titley and District Group Neighbourhood Plan

- 5.1 The draft Titley and District Group Neighbourhood Plan presents detailed policies for development in the Neighbourhood Area up to 2031. All neighbourhood plans are required to be in general conformity with the adopted Herefordshire Core Strategy. Proportional growth for development is contained within the Core Strategy Policy RA1 and RA2 and neighbourhood plans will seek to allocate this proportional of development to be in conformity with the Core Strategy.
- 5.2 The Plan begins by introducing its preparation and highlighting its issues. It then details the vision for the parish over the plan period until 2031 together with a number of objectives to realise that visions:

Housing and settlements

The Neighbourhood Development Plan will ensure that new housing contributes to thriving communities by:

- Identifying land for new housing and demonstrating delivery to meet the requirements of the Local Plan Core Strategy.
- Defining the planned extent of the settlements of Titley and Staunton-on-Arrow.
- Requiring new housing to provide a mix of size and type of properties to meet community needs.

Economic and social development

The Neighbourhood Development Plan will guide economic and social development by:

- Supporting rural diversification and other forms of economic development which are appropriate to their location and setting.
- Working to improve electronic communications.
- Supporting renewable energy, particularly community-led proposals.
- Supporting the retention of existing community facilities and new provision.
- Identifying Community Actions in respect of non-land use matters which are outside the formal scope of the Neighbourhood Development Plan.

Environment

The Neighbourhood Development Plan will ensure that the local environment is protected and enhanced by:

- Providing for the protection, enhancement and conservation of the natural and historic environments in accordance with Local Plan Core Strategy policies.
- Ensuring that new development is in keeping with its surroundings and appropriately designed and accessed.
- Supporting high quality design solutions that make a positive contribution to local character and distinctiveness.

Sustainable development

The Neighbourhood Development Plan plays an active role in guiding development in Titley Group towards a sustainable solution by setting out the economic, social and environmental character of the area and identifying needs and opportunities. Responses to the residents' survey show that there are a range of concerns including addressing housing requirements, encouraging local employment, protecting the environment, and

improving community facilities and services. Opportunities should also be sought to boost sustainable transport provision in the Area. Some development proposals may entail a mix of gains and losses when assessed against the differing priorities in the Vision and its supporting objectives. Planning decisions will need to balance such variable impacts against each other in considering how individual projects contribute to sustainability, taking into account the character, needs and opportunities of the Neighbourhood Area.

5.4 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. Of the five options put forward the 'no NDP / do nothing' option (option 1) was not considered viable for the parish. All of which indicated towards growth however all the options would be seeking to provide proportional growth in line with the Core Strategy.

5.5 The neighbourhood plan also sets out 16 general policies on a variety of topic bases areas including 2 site allocations or specific site related policies. These include:

- Policy TG1: Sustainable development
- Policy TG2: Housing needs and requirements
- Policy TG3: Rural exception housing
- Policy TG4: Land at Titley Farm (site)
- Policy TG5: Titley settlement boundary
- Policy TG6: Land opposite Old Court Cottage/Newton, Staunton-on-Arrow
- Policy TG7: Small sites at Staunton-on-Arrow (site)
- Policy TG8: Staunton-on-Arrow settlement boundary
- Policy TG9: Economic development in Titley Group
- Policy TG10: Infrastructure
- Policy TG11: Renewable energy
- Policy TG12: Community facilities
- Policy TG13: Landscape
- Policy TG14: Natural environment
- Policy TG15: Historic environment
- Policy TG16: Design and access

5.6 The first report assessed the policies at Regulation 14 stage, these have since been subject to consultation and revised by the Parish Council. A five policies have been subject to minor wording changes.

5.7 Of these five policies, three have been subject to the further AA assessment and are as follows:

- Policy TG4: Land at Titley Farm (site)
- Policy TG6: Land opposite Old Court Cottage/Newton, Staunton-on-Arrow
- Policy TG7: Small sites at Staunton-on-Arrow (site)

6 Assessing the impacts of the Titley and District Group 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 (February 2017).

- 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 plan are:
- Kington (received a no vote at referendum)
 - Lyonshall (adopted)
 - Pembridge (adopted)
 - Stapleton Group (not currently preparing and NDP)
- 6.5 The combination of the growth proposed within these plans does not exceed that set out within the Core Strategy.
- 6.7 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.
- 6.8 It is unlikely that the Titley and District Group 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 Kington Housing Market Area in the Herefordshire Core Strategy.
- 6.9 A matrix has been used to assess all the policies and proposals within the neighbourhood plan and full details can be seen in appendix 3.

7 Mitigation Measures

- 7.1 An Appropriate Assessment is being undertaken as the Titley and District Group Neighbourhood Plan is located within the River Lugg catchment area.
- 7.2 It is therefore the ability to consider any potential mitigation measures which could be applied which would reduce the likely significant effects on the integrity of the site. The following potential mitigation measures are indicated below.

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 River Lugg catchment area. Therefore no site allocations proposed within the neighbourhood plan will receive planning permission unless they can also meet the criteria of Policy SD4.
- 7.4 It should be borne in mind that site allocations do not grant permission for a site and do not directly lead to development. All site allocations will still require planning permission to be granted before any development can take place. This means that all site allocation will be subject to a further environmental assessment/Habitat Regulation Assessment/Appropriate Assessment prior to development taking place or any potential impact to the SAC directly.

- 7.5 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 proposed Levelling Up and Regeneration Bill (LURB) will place a new statutory duty on water and sewerage companies in England to upgrade wastewater treatment works to the highest technically achievable limits by 2030.

Natural England Nutrient Mitigation Scheme

- 7.8 Working with Defra and DLUHC, Natural England will be establishing a Nutrient Mitigation Scheme to identify mitigation projects within the catchment to frontload investment; this could include wetland and woodland creation schemes. The recent advice from DLUHC indicates that LPA can be confident that upgrades and mitigation will be in place by 2030 reducing the mitigation requirements for the in perpetuity period. The delivery of sites can take into account this strategic mitigation and the accelerated timescales for mitigation schemes and water treatment upgrades.

Nutrient Management Plan review

- 7.9 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.
- 7.10 The Nutrient Management Board comprises of a number of partners including Natural England, Environment Agency, National Farms Union, local planning authorities and Welsh Water.
- 7.11 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.

Proposed wetlands and the Interim Development Plan

- 7.12 Herefordshire Council are currently investigating the potential for integrated wetlands to assist in the reduction of phosphate levels within the catchment. Wetlands can remove phosphorous from surface water runoff or stream flow or remove the final effluent from waste water treatments plants or package treatment plants. They are designed to filter, use sedimentation and plant take up. If the management of wetlands can be secured then they will provide a significant reduction in phosphorous within the catchment.
- 7.13 The Interim Development Plan includes proposed wetlands and other agricultural measures including buffer zones which will provide a reduction in phosphorous in the catchment.

Nutrient Neutral / betterment

- 7.14 Nutrient Neutral is where mitigation measures or avoidance included within the neighbourhood plan can counterbalance any phosphate increase attributed to the plan's policies and proposals or would lead to betterment. Neutrality will need to be demonstrated with certainty. The development will need to show that it avoids harm to the protected site or provided the level of mitigation required to ensure that there is no adverse effects.
- 7.15 The Titley Group NDP contains a specific requirement for all developments to demonstrate nutrient neutrality in order to gain planning permission – Policy TG14. The specific range of mitigation measures to enable this to take place are contained within the Interim Phosphate Plan – Stage 2 which is available on the Herefordshire Council website. This document can give applicants a wide range of mitigation options which can be tailored to the local requirements. As the scientific knowledge is growing all the time, the most appropriate place for this information is within the Stage 2 report with a link to the Policy reasoned justification.
- 7.16 **Providing options to developers and applicants** - Additional guidance is provided to developers seeking to provide nutrient neutral developments. The ***Interim Phosphate Delivery Plan Stage 2*** – Mitigation options for phosphate removed provides a range of potential mitigation solutions that could be used and a set of recommendations are included to provide a robust solution to achieve nutrient neutral residential developments. This document has been available on the Council's website since March 2021.
- 7.18 The ***interim Phosphate Delivery Plan Stage 1*** provides guidance to calculating the phosphate budget for new developers with a phosphate calculate tool. Regular position statements are placed on the Council's website to update developers and applicants for the requirements to demonstrate nutrient neutrality and the options for this.
- 7.19 As the work is ongoing and moving at a pace, it is considered that the best and most accurate guidance for developers on the options to achieve nutrient neutrality is within these guidance documents on the website and not specifically within the NDP policy or text. This is because during the plan period, methods could be refined and solutions that are more appropriate found. The guidance notes and website can easily respond to this update unlike the supporting text of the neighbourhood plan

Interim approach to planning applications

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

7.21 These are:

- Drainage fields is more that 50m from the designated site boundary and;
- Drainage field is more than 40m from any surface water feature (ditch, drain, watercourse and;
- Drainage field is in an area with a slope no greater than 15% and;
- Drainage field is in an area where the high water table groundwater depth is at least 2m below the surface at all times and;
- There are no other hydrological pathways which would expedite the transport of phosphorous (fissured geology, shallow soil, flooding)

8 Summary of findings

8.1 This assessment has considered the likely significant effects of the Titley and District Group Neighbourhood Plan on the following National Network Sites

- River Wye (including the River Lugg) SAC

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

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

8.4 The settlement boundary falls within or on the boundary of the WWTW area in Titley village at Titley Wastewater Treatment Works, The Forge Titley Kington.

8.5 Water supply in this area comes from Dwr Cymru Welsh Water (DCWW) wastewater treatment works (WWTW). DCWW have commented that that there is available headroom at present.

8.6 In 2017 an application for proposed upgrades and extension to existing wastewater treatment site at Titley WWTW was submitted and approved. Various works to include: septic tank de-sludge pipework, two stage reed bed. In 2019 Discharge of Conditions application was submitted, this application is still valid.

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

8.8 The possible allocation of development on a non-determined rural site within the plan does not directly lead to development. All site allocations or rural exception site developments require a planning application which demonstrates that the Policy SD3, SD4 and Policy TG14 and TG15 have been met and taking into account the mitigation measures highlighted above it is concluded that no likely significant effects would result.

- 8.9 The 2 site allocations have also been assessed. It should be borne in mind that site allocations do not grant planning permission and all site allocations will be subject to a more detailed assessment at planning application stage.
- 8.9 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. Hence reference to the Phosphate Calculator and Interim Plan within the reasoned justification is appropriate to ensure safeguards against this evolving situation and flexibility to include tested mitigation measures once the plan is adopted
- 8.10 The national nutrient neutrality and migration announced within the Ministerial Statement dated 20 July 2022 also demonstrate evidence that mitigation will be in place during the plan period of 2031.
- 8.11 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 when the mitigation and avoidance measures have been taken into account.
- 8.12 **Therefore it is concluded that there will be no adverse effects on the integrity of the River Wye (including River Lugg) SAC.**

9 Consultation

- 9.1 This report will accompany the Reg16 version of the Neighbourhood Plan.

Appendix 2

Date: 10 March 2017
Our ref: 209115
Your ref: Titley & District Group NP - SEA Scoping Report



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Dear James

Planning consultation: Titley & District Group Neighbourhood Plan – Strategic Environmental Assessment (SEA) Scoping Report

Thank you for your consultation on the above dated 21/02/2017

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Strategic Environmental Assessment

Natural England welcomes the scoping report for the Titley & District Neighbourhood Plan and considers that the methodology and baseline information used to inform the report appears to meet the requirements of the SEA Directive (2001/42/EC) and associated guidance.

Since the Neighbourhood Plan area lies within the catchment of the River Wye Special Area of Conservation (SAC) and likely significant effects cannot be ruled out, we are pleased to note that this has been taken into account in the scoping report, as have the potential impacts on Flintsham & Titley Pools Site of Special Scientific Interest (SSSI).

Habitats Regulations Assessment Screening

Natural England notes the screening process applied to this Neighbourhood plan. We agree with the Council's conclusion that likely significant effects upon the named European designated site below cannot be ruled out and therefore a full HRA will be required:

- River Wye Special Area of Conservation (SAC)

In accordance with Schedule 2 of The Neighbourhood Planning (General) Regulations 2012, a neighbourhood plan cannot be made if the likelihood of significant effects on any European Site, either alone (or in combination with other plans and projects) cannot be ruled out.

Further guidance on deciding whether the proposals are likely to have significant environmental effects and the requirements for consulting Natural England on SEA are set out in the [National Planning Practice Guidance](#).

We refer you to the attached annex which covers the issues and opportunities relevant to neighbourhood plans which may be helpful to you.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact Caolan Gaffney on 02080 266680. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service

Yours sincerely

Caolan Gaffney
Planning Adviser
Sustainable Development
East Midlands Area Team

Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

Natural environment information sources:

The [Magic](#)^[1] website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, National Parks (England), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available [here](#)^[2].

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)^[3]. Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](#)^[4]. There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty** (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](#)^[5] website and also from the [LandIS website](#)^[6], which contains more information about obtaining soil data.

Natural environment issues to consider

The [National Planning Policy Framework](#)^[7] sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](#)^[8] sets out supporting guidance. Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

[1] <http://magic.defra.gov.uk/>

[2] <http://www.nbn-nfbr.org.uk/nfbr.php>

[3] <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

[4] <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

[5] <http://magic.defra.gov.uk/>

[6] <http://www.landis.org.uk/index.cfm>

[7] <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

[8] <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)^[9]), such as Sites of Special Scientific Interest or [Ancient woodland](#)^[10]. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here](#)^[11]) or protected species. To help you do this, Natural England has produced advice [here](#)^[12] to help understand the impact of particular developments on protected species.

Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see our publication [Agricultural Land Classification: protecting the best and most versatile agricultural land](#)^[13].

Improving your natural environment

Your plan or order can offer exciting opportunities to enhance your local environment. If you are setting out policies on new development or proposing sites for development, you may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development. Examples might include:

- Providing a new footpath through the new development to link into existing rights of way.
- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to encourage wildlife.
- Adding a green roof to new buildings.

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision.
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance on this](#)^[14]).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks, changing hedge cutting timings and frequency).
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

^[9] <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

^[10] <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

^[11] <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

^[12] <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

^[13] <http://publications.naturalengland.org.uk/publication/35012>

^[14] <http://planningguidance.planningportal.gov.uk/blog/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space/local-green-space-designation/>

Appendix 3

Neighbourhood Plan Policy Screening – Titley and District Group Neighbourhood Plan

Policy Number	Potential effect	In-combination effects	Likely Significant effect (Yes/ No and state how)
Policy TG1: Sustainable development	Policy itself will not lead to development but outlines provision for actions to achieve sustainable development		No the policy is seeking to protect the environment through sustainable development options
Policy TG2: Housing needs and requirements	Policy itself will not lead to development but outlines requirements and needs in the parish		No the policy does not lead to development itself
Policy TG3: Rural exception housing	The location of the development is currently unknown, its implementation will be subject to a planning application	<p>Defining the area for potential housing growth in rural areas outside of the settlement boundary</p> <p>Increased traffic</p> <p>Increased demand on water abstraction</p> <p>Increased demand on sewage treatment</p>	<p>LSE</p> <p>The policy is seeking to support delivery of housing within the neighbourhood area within the plan period</p>
Policy TG4: Land at Titley Farm (site)	The policy could have a likely to have an impact on water quality	<p>Policy for housing development in line with Core Strategy targets.</p> <p>Increase in vehicle traffic.</p> <p>Increased demand for water abstraction and sewage treatment.</p>	<p>LSE</p> <p>The policy is looking to deliver around 6 dwellings and recreational open space</p>

Policy Number	Potential effect	In-combination effects	Likely Significant effect (Yes/ No and state how)
Policy TG5: Titley settlement boundary	The location of the development is not specified within this policy its implementation will be subject to a planning application and site allocations	Defining the area for potential housing growth Increased traffic Increased demand on water abstraction Increased demand on sewage treatment	LSE The policy is seeking to support delivery of housing within the neighbourhood area within the plan period
Policy TG6: Land opposite Old Court Cottage/Newton, Staunton-on-Arrow	The location of the development is not specified within this policy its implementation will be subject to a planning application	Defining the area for potential housing growth Increased traffic Increased demand on water abstraction Increased demand on sewage treatment	LSE The policy is seeking to support delivery of housing within the neighbourhood area within the plan period
Policy TG7: Small sites at Staunton-on-Arrow (site)	The policy could have a likely to have an impact on water quality	Policy for housing development in line with Core Strategy targets. Increase in vehicle traffic. Increased demand for water abstraction and sewage treatment.	LSE The policy is looking to deliver small scale housing developments on the sites.
Policy TG8: Staunton-on-Arrow settlement boundary	The location of the development is not specified within this policy its implementation will be subject	Defining the area for potential housing growth Increased traffic	LSE The policy is seeking to support delivery of around five dwellings

Policy Number	Potential effect	In-combination effects	Likely Significant effect (Yes/ No and state how)
	to a planning application and site allocations	Increased demand on water abstraction Increased demand on sewage treatment	within the neighbourhood area within the plan period
Policy TG9: Economic development in Titley Group	The location of the development is currently unknown, its implementation will be subject to a planning application	Policy to support employment development. Increase in vehicle traffic. Increased demand for water abstraction and sewage treatment.	LSE The locations of any development is yet to be known
Policy TG10: Infrastructure	The location of the development is currently unknown, its implementation will be subject to a planning application		No the policy does not lead to development itself
Policy TG11: Renewable energy	The location of the development is currently unknown, its implementation will be subject to a planning application		No the policy does not lead to development itself
Policy TG12: Community facilities	The location of the development is currently unknown, its implementation will be subject to a planning application		No the policy does not lead to development itself
Policy TG13: Landscape	Policy is seeking to conserve, enhance or protect the built, natural and/or historic environment		No the policy is seeking to avoid adverse effects on the River Wye SAC

Policy Number	Potential effect	In-combination effects	Likely Significant effect (Yes/ No and state how)
Policy TG14: Natural environment	<p>Policy is seeking to conserve, enhance or protect the built, natural and/or historic environment</p> <p>Policy is specifically seeking to protect sensitive sites</p> <p>Policy is guiding development away from the sensitive sites</p>		No the policy is seeking to avoid adverse effects on the River Wye SAC
Policy TG15: Historic environment	Policy is seeking to conserve, enhance or protect the built, natural and/or historic environment		No the policy is seeking to protect the historic environment and will not lead to development itself
Policy TG16: Design and access	Policy itself will not lead to development but outlines provision for actions to achieve good design and supports sustainable development		No the policy is seeking to protect the environment through sustainable development options

Appropriate Assessment of the Titley Group NDP – August 2022

Policy TG3: Rural exception housing

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

Possible Mitigation measures:

Mitigation	Description
Policy SD4	Site allocations or criteria based policy does not grant permission or lead to development. A planning application will be required and any application will need to meet the requirements of Policy SD4
Main sewerage system	<p>The site is not known at this stage, the policy covers development in rural areas outside of the settlement boundary and it is not known if mains sewage would be available, more information would be provided at planning permission stage.</p> <p>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</p>
WWTW	<p>A site is unknown therefore it is not known if any development would be within the WWTW area. It is unlikely however that a rural exception site would fall within a WWTW area within the neighbourhood area of Titley and District Group.</p> <p>The Levelling Up and Regeneration Bill will place a statutory duty to upgrade wastewater treatment works to the highest technically limits by 2030. This will have a positive impact on the catchment in general.</p>
Natural England Nutrient Mitigation Scheme	<p>Working with Defra and Department of Levelling Up, Housing and Communities', Natural England will be identifying mitigation projects within the catchment; these include wetlands and woodland creation.</p> <p>Mitigation from wetlands and woodlands will provide biodiversity enhancements to areas; with the scheme providing multiple benefits by promoting public access, helping to deliver on our levelling up missions for pride in place and well-being, by improving access to nature.</p>
Integrated Wetlands	A programme of delivering integrated wetland is planned to create a number of wetlands to aid the reduction of phosphate within the catchment. The delivery of a number of these wetlands will be within the plan period.
Revised Nutrient Management Plan	A revised Nutrient Management Plan is underway which will contain a variety of measures by partners including the Environment Agency, Welsh Water, Farm Herefordshire and National Farmers Union to reduce phosphate levels within the catchment. This will be finalised within the plan period. 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 be 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
In-combination policies	<p>Policy TG14: Natural environment looks to conform with Core Strategy</p> <p>Policy SD3 and SD4 and in criteria 4 of this policy promotes the conservation, restoration and enhancement of ponds and watercourses.</p> <p>Policy TG15: Design and Access (criteria 2) looks to incorporate sustainability measures to include building orientation and design, energy and water conservation.</p> <p>Policy TG14 requires all developments to be nutrient neutral</p> <p>During the plan period (until 2031), national nutrient neutrality actions regarding upgrades to wastewater works and the Nutrient Mitigation scheme will be enacted.</p>

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

Conclusion – The criteria based policy for a non-determined rural site within the plan does not directly lead to development. All site allocations or rural exception site developments require a planning application which demonstrates that the Policy SD3, SD4 and Policy TG14 and TG15 have been met and taking into account the mitigation measures highlighted above it is concluded that no likely significant effects would result.

Policy TG5: Titley Settlement Boundary

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

Possible Mitigation measures

Mitigation	Description
Policy SD4	The allocation of a settlement boundary does not grant full planning permission or lead to development. A planning application will be required and any application will need to meet the requirements of Policy SD4
Main sewerage system	<p>The site is not known at this stage, the policy covers development within the settlement boundary and it is not known if mains sewage would be available, more information would be provided at planning permission stage.</p> <p>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</p>
WWTW	<p>The settlement boundary falls within or on the boundary of the WWTW area in Titley village at Titley Wastewater Treatment Works, The Forge Titley Kington.</p> <p>Water supply in this area comes from Dwr Cymru Welsh Water (DCWW) wastewater treatment works (WwTw). DCWW have commented that that there is available headroom at present.</p> <p>In 2017, an application for proposed upgrades and extension to existing wastewater treatment site at Titley WWTW was submitted and approved. Various works to include: septic tank de-sludge pipework, two stage reed bed. In 2019 Discharge of Conditions was submitted, this application is still valid.</p> <p>The Levelling Up and Regeneration Bill will place a statutory duty to upgrade wastewater treatment works to the highest technically limits by 2030. This will have a positive impact on the catchment in general.</p>
Integrated Wetlands	A programme of delivering integrated wetland is planned to create a number of wetlands to aid the reduction of phosphate within the catchment. The delivery of a number of these wetlands will be within the plan period.
Natural England Nutrient Mitigation Scheme	<p>Working with Defra and Department of Levelling Up, Housing and Communities', Natural England will be identifying mitigation projects within the catchment; these include wetlands and woodland creation.</p> <p>Mitigation from wetlands and woodlands will provide biodiversity enhancements to areas; with the scheme providing multiple benefits by promoting public access, helping to deliver on our levelling up missions for pride in place and well-being, by improving access to nature.</p>
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.
Interim Phosphate Plan Stage 2	<p>This document provides a range of potential mitigation solutions that could be 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 Council's website since March 2021 and can be found on the link below</p> <p>https://www.herefordshire.gov.uk/downloads/file/22211/interim-phosphate-delivery-plan-stage-2-non-technical-summary</p>
In-combination policies	<p>Policy TG13: Natural environment looks to conform with Core Strategy</p> <p>Policy SD3 and SD4 and in criteria 4 of this policy promotes the conservation, restoration and enhancement of ponds and watercourses.</p> <p>Policy TG15: Design and Access (criteria 2) looks to incorporate sustainability measures to include building orientation and design, energy and water conservation.</p> <p>Policy TG14 requires all developments to be nutrient neutral</p> <p>During the plan period (until 2031), national nutrient neutrality actions regarding upgrades to wastewater works and the Nutrient Mitigation scheme will be enacted.</p>

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

Conclusion – The possible allocation of a development site within the settlement boundary as specified within the plan does not directly lead to development. All site allocations or future development will require a planning application which demonstrates that the Policy SD3, SD4 and Policy TG14 and TG15 have been met and taking into account the mitigation measures highlighted above it is concluded that no likely significant effects would result

Policy TG8: Staunton-on-Arrow settlement boundary

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

Possible Mitigation measures:

Mitigation	Description
Policy SD4	The allocation of a settlement boundary does not grant full planning permission or lead to development. A planning application will be required and any application will need to meet the requirements of Policy SD4
Main sewerage system	The site is not known at this stage, the policy covers development within the settlement boundary and it is not known if mains sewage would be available, more information would be provided at planning permission stage.
WWTW	The Staunton-on-Arrow settlement boundary does not fall within the Titley sewerage catchment area. The Levelling Up and Regeneration Bill will place a statutory duty to upgrade wastewater treatment works to the highest technically limits by 2030. This will have a positive impact on the catchment in general.
Natural England Nutrient Mitigation Scheme	Working with Defra and Department of Levelling Up, Housing and Communities', Natural England will be identifying mitigation projects within the catchment; these include wetlands and woodland creation. Mitigation from wetlands and woodlands will provide biodiversity enhancements to areas; with the scheme providing multiple benefits by promoting public access, helping to deliver on our levelling up missions for pride in place and well-being, by improving access to nature.
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.
Interim Phosphate Plan Stage 2	This document provides a range of potential mitigation solutions that could be 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
In-combination policies	Policy TG13: Natural environment looks to conform with Core Strategy

	<p>Policy SD3 and SD4 and in criteria 4 of this policy promotes the conservation, restoration and enhancement of ponds and watercourses.</p> <p>Policy TG15: Design and Access (criteria 2) looks to incorporate sustainability measures to include building orientation and design, energy and water conservation.</p> <p>Policy TG14 requires all developments to be nutrient neutral</p> <p>During the plan period (until 2031), national nutrient neutrality actions regarding upgrades to wastewater works and the Nutrient Mitigation scheme will be enacted.</p>
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Residual effects – Having taken the above mitigation measures into account, it is considered that there are sufficient policy requirements and mitigation measures to ensure that any resulting planning application in relation to the provision of housing within the settlement boundary would enable the likely significant effects of the allocation to be removed after the site has been identified. There are therefore no residual outstanding effects.

Conclusion – The possible allocation of a development site within the settlement boundary as specified within the plan does not directly lead to development. All site allocations or future development will require a planning application which demonstrates that the Policy SD3, SD4 and Policy TG14 and TG15 have been met and taking into account the mitigation measures highlighted above it is concluded that no likely significant effects would result

Policy TG9: Economic development in Titley Group

Site allocation – Unknown

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

Possible Mitigation measures

Mitigation	Description
Policy SD4	Site allocation or support for economic development within the plan does not grant permission or lead to development. A planning application will be required and any application will need to meet the requirements of Policy SD4
Main sewerage system	<p>The site is not known at this stage, the policy covers support for economic development within the settlement boundary and it is not known if mains sewage would be available, more information would be provided at planning permission stage.</p> <p>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</p>
WWTW	<p>Any economic development as outlined as supported by the plan is within the settlement boundary and therefore falls within the WWTW area in Titley village at Titley Wastewater Treatment Works, The Forge Titley Kington.</p> <p>Water supply in this area comes from Dwr Cymru Welsh Water (DCWW) wastewater treatment works (WwTw). DCWW have commented that that there is available headroom at present.</p> <p>In 2017, an application for proposed upgrades and extension to existing wastewater treatment site at Titley WWTW was submitted and approved. Various works to include: septic tank de-sludge pipework, two stage reed bed. In 2019 DOC were submitted, this application is still valid.</p> <p>The Levelling Up and Regeneration Bill will place a statutory duty to upgrade wastewater treatment works to the highest technically limits by 2030. This will have a positive impact on the catchment in general.</p>
Natural England Nutrient Mitigation Scheme	<p>Working with Defra and Department of Levelling Up, Housing and Communities', Natural England will be identifying mitigation projects within the catchment; these include wetlands and woodland creation.</p> <p>Mitigation from wetlands and woodlands will provide biodiversity enhancements to areas; with the scheme providing multiple benefits by promoting public access, helping to deliver on our levelling up missions for pride in place and well-being, by improving access to nature.</p>
Integrated Wetlands	A programme of delivering integrated wetland is planned to create a number of wetlands to aid the reduction of phosphate within the catchment. The delivery of a number of these wetlands will be within the plan period.

Revised Nutrient Management Plan	A revised Nutrient Management Plan is underway which will contain a variety of measures by partners including the Environment Agency, Welsh Water, Farm Herefordshire and National Farmers Union to reduce phosphate levels within the catchment. This will be finalised within the plan period.
Interim Phosphate Plan Stage 2	<p>This document provides a range of potential mitigation solutions that could be 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 Council's website since March 2021 and can be found on the link below</p> <p>https://www.herefordshire.gov.uk/downloads/file/22211/interim-phosphate-delivery-plan-stage-2-non-technical-summary</p>
In-combination policies	<p>Policy TG13: Natural environment looks to conform with Core Strategy</p> <p>Policy SD3 and SD4 and in criteria 4 of this policy promotes the conservation, restoration and enhancement of ponds and watercourses.</p> <p>Policy TG15: Design and Access (criteria 2) looks to incorporate sustainability measures to include building orientation and design, energy and water conservation.</p> <p>Policy TG14 requires all developments to be nutrient neutral</p> <p>During the plan period (until 2031), national nutrient neutrality actions regarding upgrades to wastewater works and the Nutrient Mitigation scheme will be enacted.</p>

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

Conclusion – The possible allocation of development on a non-determined economic development site or area in the plan does not directly lead to development. All development will require a planning application which demonstrates that the Policy SD3, SD4 and Policy TG14 and TG15 have been met and taking into account the mitigation measures highlighted above it is concluded that no likely significant effects would result.

Policy TG6: Land opposite Old Court Cottage/Newton, Staunton-on-Arrow

Site allocation – Not a site allocation but looks to deliver 5 dwellings over plan period.

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

Possible Mitigation measures:

Mitigation	Description
Policy SD4	Site allocation does not grant permission or lead to development. A planning application will be required and any application will need to meet the requirements of Policy SD4
Main sewerage system	<p>The specific site is not known at this stage and is not an allocation, the policy covers development within this area within the settlement boundary and is allocated for community open space for use as a village green and for housing development for around five dwellings. and it is not known if mains sewage would be available, more information would be provided at planning permission stage.</p> <p>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</p>
WWTW	<p>The Staunton-on-Arrow settlement boundary does not fall within the Titley sewerage catchment area.</p> <p>The Levelling Up and Regeneration Bill will place a statutory duty to upgrade wastewater treatment works to the highest technically limits by 2030. This will have a positive impact on the catchment in general.</p>
Integrated Wetlands	A programme of delivering integrated wetland is planned to create a number of wetlands to aid the reduction of phosphate within the catchment. The delivery of a number of these wetlands will be within the plan period.
Natural England Nutrient Mitigation Scheme	<p>Working with Defra and Department of Levelling Up, Housing and Communities', Natural England will be identifying mitigation projects within the catchment; these include wetlands and woodland creation.</p> <p>Mitigation from wetlands and woodlands will provide biodiversity enhancements to areas; with the scheme providing multiple benefits by promoting public access, helping to deliver on our levelling up missions for pride in place and well-being, by improving access to nature.</p>
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.
Interim Phosphate Plan Stage 2	This document provides a range of potential mitigation solutions that could be 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
In-combination policies	<p>Policy TG13: Natural environment looks to conform with Core Strategy</p> <p>Policy SD3 and SD4 and in criteria 4 of this policy promotes the conservation, restoration and enhancement of ponds and watercourses.</p> <p>Policy TG15: Design and Access (criteria 2) looks to incorporate sustainability measures to include building orientation and design, energy and water conservation.</p> <p>Policy TG14 requires all developments to be nutrient neutral</p> <p>During the plan period (until 2031), national nutrient neutrality actions regarding upgrades to wastewater works and the Nutrient Mitigation scheme will be enacted.</p>

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

Conclusion – The possible allocation of development on a non-determined rural site within the plan does not directly lead to development. All site allocations or developments require a planning application which demonstrates that the Policy SD3, SD4 and Policy TG14 and TG15 have been met and taking into account the mitigation measures highlighted above it is concluded that no likely significant effects would result.

Policy TG4: Land at Titley Farm (site)

Site allocation – Land at Titley Farm – Looking to deliver 6 dwellings

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

Possible Mitigation measures:

Mitigation	Description
Policy SD4	Site allocation does not grant permission or lead to development. A planning application will be required and any application will need to meet the requirements of Policy SD4
Main sewerage system	The site is allocated and will be within the line drawn in the allocation, however the layout of any development is not known at this stage, more information would be provided at planning permission stage.
WWTW	<p>The site falls within the Titley settlement boundary falls, which is within or on the boundary of the WWTW area in Titley village at Titley Wastewater Treatment Works, The Forge Titley Kington.</p> <p>Water supply in this area comes from Dwr Cymru Welsh Water (DCWW) wastewater treatment works (WwTw). DCWW have commented that that there is available headroom at present.</p> <p>In 2017, an application for proposed upgrades and extension to existing wastewater treatment site at Titley WWTW was submitted and approved. Various works to include: septic tank de-sludge pipework, two stage reed bed. In 2019 DOC were submitted, this application is still valid.</p> <p>The Levelling Up and Regeneration Bill will place a statutory duty to upgrade wastewater treatment works to the highest technically limits by 2030. This will have a positive impact on the catchment in general.</p>
Natural England Nutrient Mitigation Scheme	<p>Working with Defra and Department of Levelling Up, Housing and Communities', Natural England will be identifying mitigation projects within the catchment; these include wetlands and woodland creation.</p> <p>Mitigation from wetlands and woodlands will provide biodiversity enhancements to areas; with the scheme providing multiple benefits by promoting public access, helping to deliver on our levelling up missions for pride in place and well-being, by improving access to nature.</p>
Integrated Wetlands	A programme of delivering integrated wetland is planned to create a number of wetlands to aid the reduction of phosphate within the catchment. The delivery of a number of these wetlands will be within the plan period.
Revised Nutrient Management Plan	A revised Nutrient Management Plan is underway which will contain a variety of measures by partners including the Environment Agency, Welsh Water, Farm Herefordshire and National Farmers Union to reduce phosphate levels within the catchment. This will be finalised within the plan period.

Interim Phosphate Plan Stage 2	<p>This document provides a range of potential mitigation solutions that could be 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 Council's website since March 2021 and can be found on the link below</p> <p>https://www.herefordshire.gov.uk/downloads/file/22211/interim-phosphate-delivery-plan-stage-2-non-technical-summary</p>
In-combination policies	<p>Policy TG13: Natural environment looks to conform with Core Strategy</p> <p>Policy SD3 and SD4 and in criteria 4 of this policy promotes the conservation, restoration and enhancement of ponds and watercourses.</p> <p>Policy TG15: Design and Access (criteria 2) looks to incorporate sustainability measures to include building orientation and design, energy and water conservation.</p> <p>Policy TG14 requires all developments to be nutrient neutral</p> <p>During the plan period (until 2031), national nutrient neutrality actions regarding upgrades to wastewater works and the Nutrient Mitigation scheme will be enacted.</p>

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

Conclusion – The development on this site within the plan does not directly lead to development. All site allocations or developments require a planning application which demonstrates that the Policy SD3, SD4 and Policy TG14 and TG15 have been met and taking into account the mitigation measures highlighted above it is concluded that no likely significant effects would result.

Policy TG7: Small sites at Staunton-on-Arrow (site)

Site allocation – Small sites at Staunton-on-Arrow

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

Possible Mitigation measures:

Mitigation	Description
Policy SD4	Site allocation does not grant permission or lead to development. A planning application will be required and any application will need to meet the requirements of Policy SD4
Main sewerage system	The site is allocated and will be within the line drawn in the allocation, however the layout of any development is not known at this stage, more information would be provided at planning permission stage.
WWTW	<p>The site falls within the Staunton-on-Arrow settlement boundary, of which there is no mains sewerage catchment area.</p> <p>Water supply in this area comes from Dwr Cymru Welsh Water (DCWW) wastewater treatment works (WwTw). DCWW have commented that there is available headroom at present.</p> <p>In 2017 an application for proposed upgrades and extension to existing wastewater treatment site at Titley WWTW was submitted and approved. Various works to include: septic tank de-sludge pipework, two stage reed bed. In 2019 DOC were submitted, this application is still valid.</p> <p>The Levelling Up and Regeneration Bill will place a statutory duty to upgrade wastewater treatment works to the highest technically limits by 2030. This will have a positive impact on the catchment in general.</p>
Natural England Nutrient Mitigation Scheme	<p>Working with Defra and Department of Levelling Up, Housing and Communities', Natural England will be identifying mitigation projects within the catchment; these include wetlands and woodland creation.</p> <p>Mitigation from wetlands and woodlands will provide biodiversity enhancements to areas; with the scheme providing multiple benefits by promoting public access, helping to deliver on our levelling up missions for pride in place and well-being, by improving access to nature.</p>
Integrated Wetlands	A programme of delivering integrated wetland is planned to create a number of wetlands to aid the reduction of phosphate within the catchment. The delivery of a number of these wetlands will be within the plan period.
Revised Nutrient Management Plan	A revised Nutrient Management Plan is underway which will contain a variety of measures by partners including the Environment Agency, Welsh Water, Farm Herefordshire and National Farmers Union to reduce phosphate levels within the catchment. This will be finalised within the plan period.
Interim Phosphate Plan Stage 2	This document provides a range of potential mitigation solutions that could be used within the parish. A set of recommendations are included to provide a robust solution to achieve nutrient neutral residential developments. This

	<p>document has been available on the Councils website since March 2021 and can be found on the link below</p> <p>https://www.herefordshire.gov.uk/downloads/file/22211/interim-phosphate-delivery-plan-stage-2-non-technical-summary</p>
In-combination policies	<p>Policy TG13: Natural environment looks to conform with Core Strategy</p> <p>Policy SD3 and SD4 and in criteria 4 of this policy promotes the conservation, restoration and enhancement of ponds and watercourses.</p> <p>Policy TG15: Design and Access (criteria 2) looks to incorporate sustainability measures to include building orientation and design, energy and water conservation.</p> <p>Policy TG14 requires all developments to be nutrient neutral</p> <p>During the plan period (until 2031), national nutrient neutrality actions regarding upgrades to wastewater works and the Nutrient Mitigation scheme will be enacted.</p>

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

Conclusion – The development on this site within the plan does not directly lead to development. All site allocations or developments require a planning application which demonstrates that the Policy SD3, SD4 and Policy TG14 and TG15 have been met and taking into account the mitigation measures highlighted above it is concluded that no likely significant effects would result.

Appendix 4

Consultation date: 29 August to 10 October 2022

Consultation title: Tittley Neighbourhood Development Plan (Reg14)

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

Consultee	Summary of Comments	Response to Comments
Natural England	Note Policy TG14. Inclusion of this policy will have no adverse effects on the integrity of the River Wye SAC. Generally supportive.	
Heritage England	No comments received	
Environment Agency	Welcome Policy TG14	
Natural Resources Wales	No comments received	

Appendix 5

Policy TG4: Land at Titley Farm (site)

Site allocation – Land at Titley Farm – Looking to deliver 6 dwellings

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

Possible Mitigation measures:

Mitigation	Description
Policy SD4	Site allocation does not grant permission or lead to development. A planning application will be required and any application will need to meet the requirements of Policy SD4
Main sewerage system	The site is allocated and will be within the line drawn in the allocation, however the layout of any development is not known at this stage, more information would be provided at planning permission stage.
WWTW	<p>The site falls within the Titley settlement boundary falls, which is within or on the boundary of the WWTW area in Titley village at Titley Wastewater Treatment Works, The Forge Titley Kington.</p> <p>Water supply in this area comes from Dwr Cymru Welsh Water (DCWW) wastewater treatment works (WwTw). DCWW have commented that that there is available headroom at present.</p> <p>In 2017, an application for proposed upgrades and extension to existing wastewater treatment site at Titley WWTW was submitted and approved. Various works to include: septic tank de-sludge pipework, two stage reed bed. In 2019 DOC were submitted, this application is still valid.</p> <p>The Levelling Up and Regeneration Bill will place a statutory duty to upgrade wastewater treatment works to the highest technically limits by 2030. This will have a positive impact on the catchment in general.</p>
Natural England Nutrient Mitigation Scheme	<p>Working with Defra and Department of Levelling Up, Housing and Communities', Natural England will be identifying mitigation projects within the catchment; these include wetlands and woodland creation.</p> <p>Mitigation from wetlands and woodlands will provide biodiversity enhancements to areas; with the scheme providing multiple benefits by promoting public access, helping to deliver on our levelling up missions for pride in place and well-being, by improving access to nature.</p>
Integrated Wetlands	A programme of delivering integrated wetland is planned to create a number of wetlands to aid the reduction of phosphate within the catchment. The delivery of a number of these wetlands will be within the plan period.
Revised Nutrient Management Plan	A revised Nutrient Management Plan is underway which will contain a variety of measures by partners including the Environment Agency, Welsh Water, Farm Herefordshire and National Farmers Union to reduce phosphate levels within the catchment. This will be finalised within the plan period.

<p>Interim Phosphate Plan Stage 2</p>	<p>This document provides a range of potential mitigation solutions that could be 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 Council's website since March 2021 and can be found on the link below</p> <p>https://www.herefordshire.gov.uk/downloads/file/22211/interim-phosphate-delivery-plan-stage-2-non-technical-summary</p>
<p>In-combination policies</p>	<p>Policy TG13: Natural environment looks to conform with Core Strategy</p> <p>Policy SD3 and SD4 and in criteria 4 of this policy promotes the conservation, restoration and enhancement of ponds and watercourses.</p> <p>Policy TG15: Design and Access (criteria 2) looks to incorporate sustainability measures to include building orientation and design, energy and water conservation.</p> <p>Policy TG14 requires all developments to be nutrient neutral</p> <p>During the plan period (until 2031), national nutrient neutrality actions regarding upgrades to wastewater works and the Nutrient Mitigation scheme will be enacted.</p>

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

Conclusion – The development on this site within the plan does not directly lead to development. All site allocations or developments require a planning application which demonstrates that the Policy SD3, SD4 and Policy TG14 and TG15 have been met and taking into account the mitigation measures highlighted above it is concluded that no likely significant effects would result.

Policy TG6: Land opposite Old Court Cottage/Newton, Staunton-on-Arrow

Site allocation – Not a site allocation but looks to deliver 5 dwellings over plan period.

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

Possible Mitigation measures:

Mitigation	Description
Policy SD4	Site allocation does not grant permission or lead to development. A planning application will be required and any application will need to meet the requirements of Policy SD4
Main sewerage system	<p>The specific site is not known at this stage and is not an allocation, the policy covers development within this area within the settlement boundary and is allocated for community open space for use as a village green and for housing development for around five dwellings. and it is not known if mains sewage would be available, more information would be provided at planning permission stage.</p> <p>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</p>
WWTW	<p>The Staunton-on-Arrow settlement boundary does not fall within the Titley sewerage catchment area.</p> <p>The Levelling Up and Regeneration Bill will place a statutory duty to upgrade wastewater treatment works to the highest technically limits by 2030. This will have a positive impact on the catchment in general.</p>
Integrated Wetlands	A programme of delivering integrated wetland is planned to create a number of wetlands to aid the reduction of phosphate within the catchment. The delivery of a number of these wetlands will be within the plan period.
Natural England Nutrient Mitigation Scheme	<p>Working with Defra and Department of Levelling Up, Housing and Communities', Natural England will be identifying mitigation projects within the catchment; these include wetlands and woodland creation.</p> <p>Mitigation from wetlands and woodlands will provide biodiversity enhancements to areas; with the scheme providing multiple benefits by promoting public access, helping to deliver on our levelling up missions for pride in place and well-being, by improving access to nature.</p>
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.
Interim Phosphate Plan Stage 2	This document provides a range of potential mitigation solutions that could be 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

	<p>https://www.herefordshire.gov.uk/downloads/file/22211/interim-phosphate-delivery-plan-stage-2-non-technical-summary</p>
<p>In-combination policies</p>	<p>Policy TG13: Natural environment looks to conform with Core Strategy</p> <p>Policy SD3 and SD4 and in criteria 4 of this policy promotes the conservation, restoration and enhancement of ponds and watercourses.</p> <p>Policy TG15: Design and Access (criteria 2) looks to incorporate sustainability measures to include building orientation and design, energy and water conservation.</p> <p>Policy TG14 requires all developments to be nutrient neutral</p> <p>During the plan period (until 2031), national nutrient neutrality actions regarding upgrades to wastewater works and the Nutrient Mitigation scheme will be enacted.</p>

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

Conclusion – The possible allocation of development on a non-determined rural site within the plan does not directly lead to development. All site allocations or developments require a planning application which demonstrates that the Policy SD3, SD4 and Policy TG14 and TG15 have been met and taking into account the mitigation measures highlighted above it is concluded that no likely significant effects would result.

Policy TG7: Small sites at Staunton-on-Arrow (site)

Site allocation – Small sites at Staunton-on-Arrow

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

Possible Mitigation measures:

Mitigation	Description
Policy SD4	Site allocation does not grant permission or lead to development. A planning application will be required and any application will need to meet the requirements of Policy SD4
Main sewerage system	The site is allocated and will be within the line drawn in the allocation, however the layout of any development is not known at this stage, more information would be provided at planning permission stage.
WWTW	<p>The site falls within the Staunton-on-Arrow settlement boundary, of which there is no mains sewerage catchment area.</p> <p>Water supply in this area comes from Dwr Cymru Welsh Water (DCWW) wastewater treatment works (WwTw). DCWW have commented that there is available headroom at present.</p> <p>In 2017 an application for proposed upgrades and extension to existing wastewater treatment site at Titley WWTW was submitted and approved. Various works to include: septic tank de-sludge pipework, two stage reed bed. In 2019 DOC were submitted, this application is still valid.</p> <p>The Levelling Up and Regeneration Bill will place a statutory duty to upgrade wastewater treatment works to the highest technical limits by 2030. This will have a positive impact on the catchment in general.</p>
Natural England Nutrient Mitigation Scheme	<p>Working with Defra and Department of Levelling Up, Housing and Communities', Natural England will be identifying mitigation projects within the catchment; these include wetlands and woodland creation.</p> <p>Mitigation from wetlands and woodlands will provide biodiversity enhancements to areas; with the scheme providing multiple benefits by promoting public access, helping to deliver on our levelling up missions for pride in place and well-being, by improving access to nature.</p>
Integrated Wetlands	A programme of delivering integrated wetland is planned to create a number of wetlands to aid the reduction of phosphate within the catchment. The delivery of a number of these wetlands will be within the plan period.
Revised Nutrient Management Plan	A revised Nutrient Management Plan is underway which will contain a variety of measures by partners including the Environment Agency, Welsh Water, Farm Herefordshire and National Farmers Union to reduce phosphate levels within the catchment. This will be finalised within the plan period.
Interim Phosphate Plan Stage 2	This document provides a range of potential mitigation solutions that could be used within the parish. A set of recommendations are included to provide a robust solution to achieve nutrient neutral residential developments. This

	<p>document has been available on the Councils website since March 2021 and can be found on the link below</p> <p>https://www.herefordshire.gov.uk/downloads/file/22211/interim-phosphate-delivery-plan-stage-2-non-technical-summary</p>
<p>In-combination policies</p>	<p>Policy TG13: Natural environment looks to conform with Core Strategy</p> <p>Policy SD3 and SD4 and in criteria 4 of this policy promotes the conservation, restoration and enhancement of ponds and watercourses.</p> <p>Policy TG15: Design and Access (criteria 2) looks to incorporate sustainability measures to include building orientation and design, energy and water conservation.</p> <p>Policy TG14 requires all developments to be nutrient neutral</p> <p>During the plan period (until 2031), national nutrient neutrality actions regarding upgrades to wastewater works and the Nutrient Mitigation scheme will be enacted.</p>

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

Conclusion – The development on this site within the plan does not directly lead to development. All site allocations or developments require a planning application which demonstrates that the Policy SD3, SD4 and Policy TG14 and TG15 have been met and taking into account the mitigation measures highlighted above it is concluded that no likely significant effects would result.