

# Appropriate Assessment

Report for:

Walford Neighbourhood Area

January 2023



## **Walford Neighbourhood Plan**

### **Appropriate Assessment**

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## Executive summary

This report addresses the Appropriate Assessment (AA) stage of the HRA and considers the likely significant effects on the integrity of the River Wye (including the River Lugg) SAC.

A previous Habitat Regulation Assessment has been undertaken on the Walford Neighbourhood Plan dated May 2022, however recent advice, responses from Natural England, and the Dutch Case it is considered that a Stage 2 Appropriate Assessment is required.

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

The initial Screening report May 2013 found that the River Wye (including the River Lugg) SAC borders to the parish to the west. The parish is 7.04km away from the Wye Valley Woodlands. Wye Valley and Forest of Dean Bat Sites SAC is 3.24km away from the parish, which is located south of the Neighbourhood area.

The majority of the policies within the final Walford NDP are criteria based to support development, with five site allocations, which would all require a planning application.

All of the five 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 the planning application stage.

The most significant issue with the Wye catchment is regarding water quality and these issues form the majority of the assessment of these policies. The proximity of the Wye has resulted in no direct disturbance on the qualifying feature of the SAC from the policies within the development plan. The NDP is within 10km of the Wye Valley and Forest of Dean Bat sites SAC, therefore the NDP will need to consider development impact on Greater Horse Shoe and Lesser Horseshoe bats and their habitats.

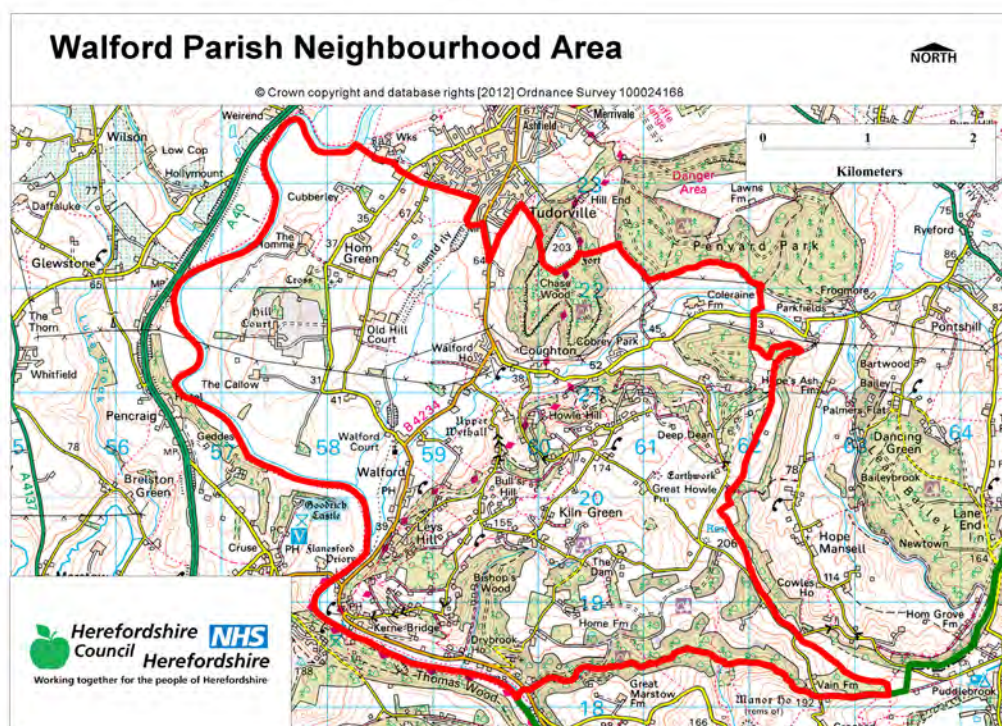
The appropriate mitigation measures can also be considered against each of the policies. The table with appendix 3 indicates where this has been the case. Herefordshire Council are investigating a wide range of mitigation measures and working with partners to resolve the current water quality issues within the Lugg catchment. The mitigation measures 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.

This report has taken account of the Nutrient Neutrality and HRA update released and Ministerial Statement issued by Department for Levelling Up, Housing and Communities on the 20/21 July 2022.

**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, Wye Valley and Forest of Dean Bat sites SAC and Wye Valley Woodlands 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, Wye Valley Woodlands and Wye Valley and Forest of Dean Bat sites SAC.
- 1.2 A previous Habitat Regulation Assessment has been undertaken on the Clifford Neighbourhood Plan dated May 2022, however following recent advice, the Dutch Case and responses from Natural England it is considered that a Stage 2 Appropriate Assessment would be applicable.
- 1.3 This report addresses the Appropriate Assessment stage; outlines the task undertaken, the findings and recommendations to support the Walford Neighbourhood Plan through to adoption.
- 1.4 Walford Parish Council has produced Neighbourhood Plan for Walford parish in order to set out the vision, objectives and policies for development within the area up to 2031. This Neighbourhood Plan will support the policies within the adopted Herefordshire Core Strategy and if adopted form part of the Herefordshire Development Plan. The Neighbourhood Plan has recently been subject to an independent examination and some modifications have been made. The plan now needs to be subject to a referendum and, if positive, adoption.
- 1.5 Below shows a map of the Neighbourhood Plan Area.



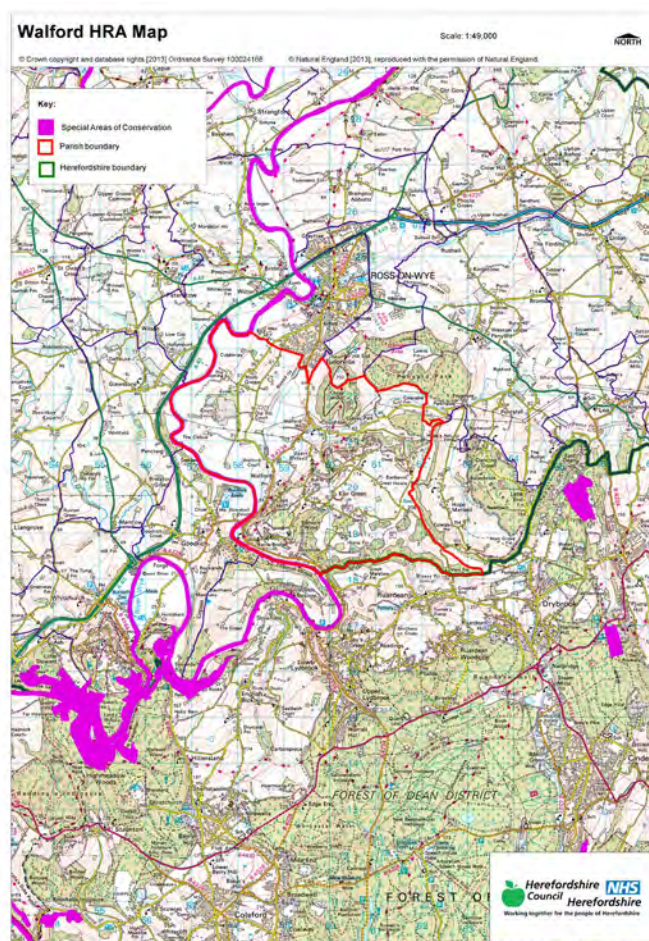
## 2 Requirement for the HRA

- 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, Walford Parish Council is required by law to carry out an assessment known as “Habitats Regulations Assessment”. It is also a requirement in Regulation 32 schedule 2 of the Neighbourhood Planning Regulations 2012.

- 2.2 Herefordshire Council is aware of the recent judgment (People over Wind, Peter Sweetman vs Coillte). The Court of Justice of the European Union (CJEU) ruled that the Habitats Directive must be interpreted as meaning that mitigation measures should be assessed within the framework of an Appropriate Assessment and that it is not permissible to take account of measures intended to avoid or reduce the harmful effects of the plan on a National Network site at the screening stage. The initial screening undertaken in May 2013 and concluded that a full HRA would be required
- 2.3 The Co-operation Mobilisation (The Dutch case) ruling will also have an impact on Herefordshire in the areas within the catchment of the River Lugg. As this Neighbourhood Area is within the River Wye catchment area however it has been concluded that a Stage 2 Appropriate Assessment be undertaken to include a range of potential mitigation.

### 3 Stage 2 – Appropriate Assessment

- 3.1 As highlighted above the Walford Neighbourhood Plan is to be subject to a Stage 2 Appropriate Assessment.
- 3.2 The initial screening and scoping under on May 2013 has identified that the plan may have potential impacts and effects on the following National Network sites:
- River Wye (including the River Lugg) SAC
  - Wye Valley & Forest of Dean Bat Sites SAC
  - Wye Valley Woodlands
- 3.3 The map below shows the Walford Neighbourhood Area in relation to the SACs.



- 3.4 Previous Habitat Regulation Assessment have been undertake May 2022 whilst the neighbourhood plan has been in production. Recent advice and responses to plans within the River Wye catchment have indicated that further Appropriate Assessment work is required specifically to consider the impact of any Neighbourhood Plan on water quality within the catchment. It is therefore considered given the proximity of the River Wye within this neighbourhood area that an Appropriate Assessment is undertaken here.
- 3.5 The requirements of the Appropriate Assessment can be broken down into 5 areas;
- 1 Scoping
    - Collect information regarding the National Network Site
    - Any additional Environment Condition information
  - 2 Assessing the impacts
    - Assess the impacts of the neighbourhood plan policies and proposals
    - Consider the in-combination effects
    - Consider the cumulative effects
  - 3 Mitigation measures
    - Consider the potential mitigation measures
  - 4 Summary and recommendations
  - 5 Consultation

#### **4 Scoping**

- 4.1 The initial Screening report May 2013 found that the Parish falls within the hydrological catchment of the River Wye (including the River Lugg) SAC and is within 10km of Wye Valley Woodlands and Wye Valley and Forest of dean bat sites. Therefore, a full screening assessment is required.
- 4.2 There is also a duty under the Water Framework Directive to ensure that proposals for growth do not adversely affect the river water quality and this included the associated watercourses flowing into the rivers.

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

- 4.3 The River Wye forms one of the longest near natural rivers in England and Wales. The 25km within Herefordshire runs from Hay-on-Wye to Monmouth passing through Hereford and Ross-on-Wye. This section of the river is a rare example of eutrophic river and has not been subject to straightening.
- 4.4 There are a number of qualifying site features within the English section of the River Wye SAC:
- Water crowfoot vegetation
  - White-clawed crayfish
  - Sea Lamprey
  - Brook lamprey
  - River Lamprey
  - Twait shad / Allis shad
  - Atlantic salmon
  - Bullhead
  - Otter

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

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

- 4.9 The River Lugg is considered to be 'failing' its water quality targets because it has exceeded the phosphate limit over 3 years testing period. Testing is undertaken between March and September by the Environment Agency. Although the Lower Wye is at risk of failing, it has currently not been declared as 'failing'
- 4.10 Phosphorous enter the river via two distinct avenues: point source pollution (waste water treatment works 'WWTW') and diffuse source pollution (run off from roads and agricultural).
- 4.11 Discharges from WWTW are monitored and controlled by the issuing of Permitted Discharge Consents but diffuse pollution depends upon a number of different factors including land management, stock near to rivers and run off.
- 4.12 The Wye and Lugg Monitoring Dashboard indicates that as at 2019 (the latest figures published), the phosphate levels within the River Lugg at the testing point at Mordiford Bridge were recorded as 0.12mg/l with the target set at 0.05mg/l.
- 4.13 In 2019, the sewerage treatment works within the Lugg catchment area were reporting 100% compliance with phosphate limits.
- 4.14 For the Lower Wye (at Carrots Pool, Hereford) it is within target at 0.01mg/l against the target of 0.03mg/l and within the Lower Wye (at Holme Lacy) it is 0.03mg/l against the target of 0.03mg/l. The sewerage treatment works within the Upper and Lower Wye are also reporting 100% compliance with their phosphate limits.

#### **Site integrity of the Wye Valley & Forest of Dean Bat Sites SAC and Wye Valley Woodlands SAC**

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

- 4.16 NDPs sites within 10 km of the Wye Valley and Forest of Dean Bat Sites and Wye Valley Woodlands will need to consider development impact to these species and their habitats. NDPs closest to the Wye Valley Woodlands will need to consider: Woodland habitat buffer. Lesser Horseshoe Bat: Old buildings; woodland locations; sheltered valleys, extensive deciduous woods or dense scrub, close to roost sites. In areas of fragmented habitats, linear habitats such as hedgerows are important corridors. Vulnerable to loss or disturbance of both summer and winter roosts and removal of linear habitat.
- 4.17 The issues associated with maintaining the sites integrity include impact of development result in changes in landscape and townscape. As outlined within the Habitat Regulation Assessment to the Herefordshire Core Strategy, impact on European sites is dependent on scale and proximity to the European sites.
- 4.18 In relation to impact on biodiversity and important species, Policy LD2 of the Herefordshire Core Strategy indicates that any development should conserve, restore and enhance biodiversity and geodiversity assets of Herefordshire. Development within close proximity to internationally and local designated sites will need to incorporate sympathetic design components to enhance their nature conservation interests.
- 4.19 For full details of the three SAC attributes which contribute to and define their integrity and vulnerable data see Appendix 1 of the Walford Initial Screening Report. The Initial Screening Report, May 2013, can be found in Appendix 1 of this HRA report.
- 4.20 This information made it possible to identify the features of each site which determine site integrity, as well as the specific sensitivities of each site, therefore enabling later analysis of how the potential impacts of the Walford Neighbourhood Plan may affect site integrity.
- 4.21 The initial screening assessment indicated that a full screening assessment is required to assessment the likelihood of significant effects on the River Wye (including the River Lugg) SAC, Wye Valley and Forest of Dean Bat sites SAC and Wye Valley Woodlands SAC on the policies within the Walford NDP.

## **5 Description of the Walford Neighbourhood Plan**

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



5.3 The neighbourhood plan also sets out 23 planning policies on a variety of topic bases areas with site allocations and specific site related policies. These NDP policies are listed below:

- Policy WALF1: Promoting Sustainable Development
- Policy WALF2: Development Strategy
- Policy WALF3: Major Development Within the Wye Valley AONB
- Policy WALF4: Conserving the Landscape and Scenic Beauty of the Parish
- Policy WALF5: Protecting Important Views within the Parish and the Settings of its Settlements
- Policy WALF6: Enhancement of the Natural Environment
- Policy WALF7: Protecting Heritage Assets
- Policy WALF8: Wastewater Drainage
- Policy WALF9: Protection from Flood Risk
- Policy WALF10: Sustainable Design
- Policy WALF11: Renewable and Low Carbon Energy Generation
- Policy WALF12: Highway Design Requirements
- Policy WALF13: Traffic Measures within the Parish
- Policy WALF14: Protection and Enhancement of Community Facilities and Businesses serving the Local Community.
- Policy WALF15: Contributions to Community Facilities.
- Policy WALF16: High Speed Broadband and Telecommunications
- Policy WALF17: Design and Appearance
- Policy WALF18: Housing Development in Walford and Coughton
- Policy WALF19: Housing Development in Bishopswood
- Policy WALF20: Housing Development in Howle Hill
- Policy WALF21: Proposed Housing Sites
- Policy WALF22: Use of Rural Buildings for Business
- Policy WALF23: Polytunnel Proposals

5.4 The plan reached examination stage in December 2022 and policies have been modified as a result of the examination. The following policies have been subject to modification, no policies have been rescreened due to the minor nature of the modifications. The modifications had minor wording changes to clarify and update the policies.

- Policy WALF1-Minor wording change
- Policy WALF2-Minor wording change
- Policy WALF3-Minor wording change
- Policy WALF6- Minor wording change
- Policy WALF 7-Minor wording change
- Policy WALF 18-Minor wording change
- Policy WALF 20-Minor wording change
- Policy WALF 23-Minor wording change

5.5 It has been concluded that the modifications made will not have a significant adverse impact on the HRA objectives and therefore the conclusions of the SEA remain the same from the previous report

## **6 Assessing the impacts of the Walford Neighbourhood Plan**

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

- 6.2 There are a number of potentially relevant plans and projects which may result in in-combination effects with the Core Strategy across Herefordshire, these plans have been reviewed and can be found in Appendix 2 of the HRA of the Core Strategy and specifically for this neighbourhood plan in the Stage A report dates April 2014.
- 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:
- Ross-on-Wye – adopted
  - Goodrich and Welsh Bicknor adopted
  - Weston Under Penyard– adopted
  - Bridstow-At examination
  - Hope Mansell-No NDP
  - Marstow-No NDP
- 6.5 The combination of the growth proposed within these plans does not exceed that set out within the Core Strategy.
- 6.6 The HRA for the Core Strategy also identifies that both the Water Cycle Study for Herefordshire, which indicates the potential for planned water abstraction requirements combined with pressures on European Sites from the Core Strategy policies, and the review work on the Nutrient Management Plan, have both been considered as part of the in-combination assessment.
- 6.7 It is unlikely that the Walford Plan will have any in-combination effects with any plans from neighbouring parish councils as the level of growth proposed is the same as that proposed for the Ross-on-Wye Housing Market Area in the Herefordshire Core Strategy.
- 6.8 A matrix has been used to assess all the policies and proposals within the neighbourhood plan and full details can be seen in appendix 3.

## **7 Mitigation measures**

- 7.1 An Appropriate Assessment is being undertaken as the Walford Neighbourhood Plan is located within the River Wye catchment area. Although this section of the Lower Wye is not failing its water quality objectives, Natural England have raised this as an issue. The consideration of mitigation also required the consideration within an Appropriate Assessment. Clearly, water quality within the SAC is the predominate issue here and this is reflected within the assessment undertaken.
- 7.2 It is therefore the ability to consider any potential mitigation measures, which could be, applied that would reduce the likely significant effects on the integrity of the site. The following potential mitigation measures are indicated below. The summary of findings will indicate if any of these are relevant to the Walford NDP.

### **Policy SD4**

- 7.3 Policy SD4 is contained within the adopted Herefordshire Core Strategy. This is not seen as a mitigation measure as the development plan should be read as a whole. However, compliance with the policy is required for any planning application within the catchment area. Therefore, no site allocations proposed within the 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 It is however noted the majority of the areas within the Walford parish are not on mains drainage, and will require septic tanks or private works. There is an area serving Coughton Walford that are served by waste treatment works. Therefore, this is not a mitigation measure that can be used within this NDP area but it will provide some reduction in phosphate levels within the river catchment area.
- 7.8 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**

- 7.9 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**

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

- 7.12 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. An updated NMP has been produced and published

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

- 7.13 Herefordshire Council are currently investigating the potential for integrated wetlands to assist in the reduction of phosphate levels within the river Lugg catchment. Wetlands can remove phosphorous from surface water runoff or stream flow or remove the final effluent from waste water treatments plants or package treatment plants. They are designed to filter, use sedimentation and plant take up. If the management of wetlands can be secured then they will provide a significant reduction in phosphorous within the Lugg catchment.
- 7.14 The Interim Development Plan includes proposed wetlands and other agricultural measures including buffer zones which will provide a reduction in phosphorous in the catchment.
- 7.15 There are currently no plans for integrated wetlands within the Lower Wye catchment.

### **Nutrient Neutral / betterment**

- 7.16 Nutrient Neutrality is where mitigation measures or avoidance included within the neighbourhood plan can counterbalance any phosphate increase attributed to the plan's policies and proposals or would lead to betterment. Neutrality will need to be demonstrated with certainty. The development will need to show that it avoids harm to the protected site or provided the level of mitigation required to ensure that there is no adverse effects.
- 7.17 The Walford NDP contains a number of policies seeking to protect and enhance biodiversity and feature of the SAC. The plan includes a specific requirement for all developments to demonstrate nutrient neutrality in order to gain planning permission – Policy Enhancement of the Natural Environment Policy WALF6. 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 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.

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

- 7.18 There remains potential for a positive appropriate assessment to enable development to proceed, on Natural England's advice, where it can be demonstrated that development is nutrient neutral as outlined above. Five criteria have been established where phosphates would be unlikely to reach the river as there is no pathway for impacts, these would be adjudged during the planning application stage.
- 7.19 These are:
- Drainage fields is more than 50m from the designated site boundary and;
  - Drainage field is more than 50m from any surface water feature (ditch, drain, watercourse and;
  - Drainage field is in an area with a slope no greater than 15% and;
  - Drainage field is in an area where the high water table groundwater depth is at least 2m below the surface at all times and;
  - There are no other hydrological pathways which would expedite the transport of phosphorous (fissured geology, shallow soil, flooding)

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

## 8 Summary of findings

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

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

8.2 The neighbourhood area falls within the Lower Wye catchment area and although this area is not failing its water quality objectives at present, an Appropriate Assessment is being undertaken in light of recent comments from Natural England.

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

8.4 After an initial screening 9 policies and 4 site allocations that are concerned to have potential likely significant effects.

- Policy WALF2: Development Strategy
- Policy WALF11: Renewable and Low Carbon Energy Generation
- Policy WALF16: High Speed Broadband and Telecommunications
- Policy WALF18: Housing Development in Walford and Coughton
- Policy WALF19: Housing Development in Bishopswood
- Policy WALF20: Housing Development in Howle Hill
- Policy WALF21: Proposed Housing Sites
- Policy WALF22: Use of Rural Buildings for Business
- Policy WALF23: Polytunnel Proposals
- Land at Watling Street SR24 (Allocation)
- Land at Leys Hill SR26 (Allocation)
- Arthurs Dingle Leys Hill SR32 (Allocation)
- Lower Field of Orchard Heights SR34 (Allocation)

8.5 The majority of these policies are not specific site allocations but have criteria to support development. Therefore they would all require a further planning application.

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

8.7 The most significant issue is regarding water quality and that is the forms the majority of the assessment of these policies.

8.8 At this stage the appropriate mitigation measures can also be considered against each of the policies. The table with appendix 3 indicates where this has been the case. Herefordshire Council are investigate a wide range of mitigation measures and working with partners to resolve the current water quality issues within the Lugg catchment and are minded to the water quality within the Lower Wye catchment area.

8.9 Following the previous assessment, the NDP has included water management policies but would benefit from some additional wording in some of the allocation policies regarding the need for a foul and sewerage management strategy. The settlement of Coughton is

covered by mains drainage and connected to The Lower Cleeve water treatment works. However, as some areas are not covered by mains drainage within the parish. This would enable the considerations of drainage to be taken fully into account prior to any applications being granted.

- 8.10 The parish is not within a catchment which is currently 'failing' but the inclusion of the nutrient neutrality criteria in policy WALF 6 benefits to including a policy with regards to the need for nutrient neutrality if during the plan period the Lower Wye catchment did follow that of the current Lugg catchment.
- 8.11 The mitigation measures referenced within the document could be expanded and refined prior to any planning permissions in association with the policies of this development plan are approved. 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.
- 8.12 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.
- 8.13 The results of this Appropriate Assessment indicate that in regards to foul and sewerage management strategies and nutrient neutrality there will not be a significant effect on the integrity of the River Wye (including River Lugg) SAC, Wye Valley & Forest of Dean Bat Sites SAC AND Wye Valley Woodlands SAC or the (include any other) when the mitigation and avoidance measures have been taken into account.
- 8.14 **Therefore it is concluded that there will not be any likely significant effects on the integrity of the River Wye (including River Lugg) SAC, Wye Valley & Forest of Dean Bat Sites SAC and Wye Valley Woodlands SAC.**

## **9 Consultation**

- 9.1 This report will accompany the final version of the Walford Neighbourhood Plan which is current awaiting referendum and (if successful) final adoption

# Appendix 1

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

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

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

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|   |                            |
|---|----------------------------|
| <b>Neighbourhood Area:</b>                  | Walford Neighbourhood Area |
| <b>Parish Council:</b>                      | Walford Parish Council     |
| <b>Neighbourhood Area Designation Date:</b> | 14/11/2012                 |

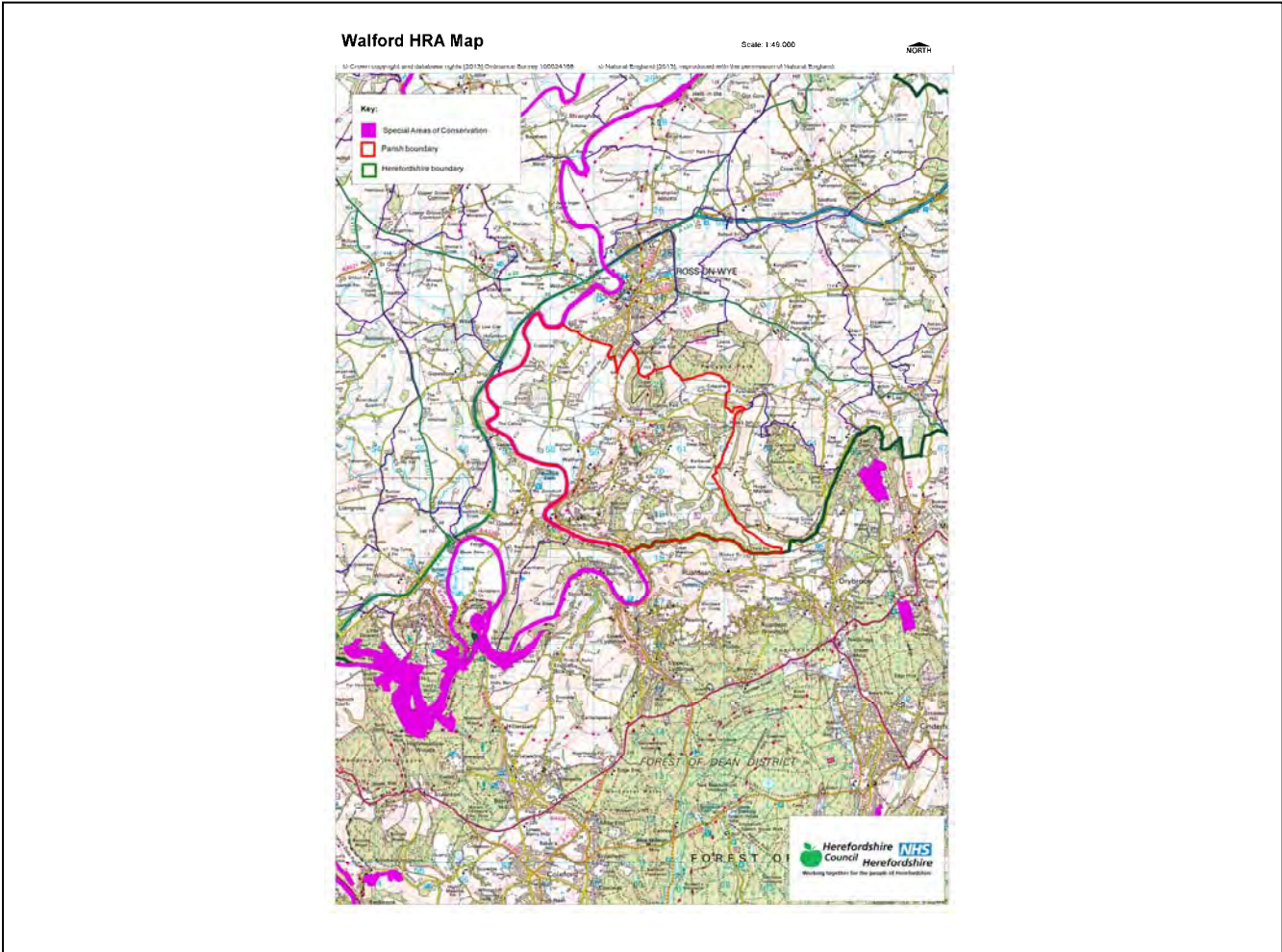
### **Introduction**

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

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



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



**Initial HRA Screening**

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

|  |   |  |
|--|---|--|
| Does the Neighbourhood Area have the River Wye (including the River Lugg) in or next to its boundary?    | Y | The River Wye borders the Parish to the west.      |
| Is the Neighbourhood Area in the hydrological catchment of the River Wye (including the River Lugg) SAC? | Y | The Parish is within the River Wye catchment area. |
| If yes above, does the Neighbourhood Area have mains drainage to deal with foul sewage?                  | Y | There is mains drainage within Howle Hill          |

**Downton Gorge SAC:**

|   |   |   |
|---|---|---|
| Is the Neighbourhood Area within 10km of Downton Gorge SAC? | N | Downton Gorge is 51.67km away from the Parish |
|---|---|---|

**River Clun SAC:**

|  |   |                                       |
|--|---|---------------------------------------|
| Does the Neighbourhood Area include: Border Group Parish Council or Leintwardine Group Parish Council? | N | River Clun does not border the Parish |
|--|---|---------------------------------------|

**Usk Bat Sites SAC:**

|  |   |   |
|--|---|---|
| Is the Neighbourhood Area within 10km of the SAC boundary? | N | Usk Bat Sites are 38.1km away from the Parish |
|--|---|---|

**Wye Valley & Forest of Dean Bat Sites SAC:**

|  |   |  |
|--|---|--|
| Is the Neighbourhood Area within 10km of any of the individual sites that make up the Wye Valley & Forest of Dean Bat Sites? | Y | The Parish is 3.24km away from Wye Valley and Forest of dean Bat Sites |
|--|---|--|

**Wye Valley Woodlands SAC:**

|  |   |   |
|--|---|---|
| Is the Neighbourhood Area within 10km of any of the individual sites that make up the Wye Valley Woodlands Site? | Y | The Parish is 7.04km away from the Wye Valley Woodlands |
|--|---|---|

**HRA Conclusion:**

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

**European Site**

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

River Wye (including the River Lugg) SAC

Wye Valley and Forest of Dean Bat Sites SAC

Wye Valley Woodlands SAC

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

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

| SEA features  | Total                          | Explanation  | SEA required |
|---|--------------------------------|--|--------------|
| Air Quality Management Areas                              | 0                              | There are no AQMA's within the Parish  | N            |
| Ancient Woodland  | 15                             | Chase Wood; Penyard Park; Howle Hill Wood; Hengrove and Warmhill Woods; Deep Dean; Mark's Well Wood; Purlieu Wood; Lodge Grove; Beech Tree Wood; Ferry Bank – Mayers Grove; Dam Wood; Wet Wood; Sixteen Acre Wood; Thomas Wood (border); Unlabelled site at Vain Farm                | Y            |
| Areas of Archaeological Interest                          | 0                              | There are no AAI's within the Parish   | N            |
| Areas of Outstanding Natural Beauty                       | 1                              | The west of the Parish is in the Wye Valley AONB   | Y            |
| Conservation Areas  | 0                              | There are no Conservation Areas within the Parish  | N            |
| European Sites  | 1                              | The River Wye  | Y            |
| Flood Areas   |                                | Flood Zones 2 and 3 follow the River Wye and also go east at Walford towards Coughton and out of the parish in the north east.   | Y            |
| Listed Buildings  | Numerous                       | There are numerous Listed Buildings scattered around the Parish  | Y            |
| Local Sites (SWS/SINCs/RIGS)                              | 10                             | Disused railway line – Ross to Kerne Bridge; Chase & Merrivale Woods; Coughton Wood & Marsh; Howle Hill & Marks Well; Woodlands nr Hope Mansell; Dam Wood and Copse; Coal Hill & 16 Acre Wood; Field nr Kiln Green; Field nr Forest Green; Woodlands east of Kerne Bridge; River Wye | Y            |
| Long distance footpaths/trails (e.g. Herefordshire Trail) | 4                              | Wye Valley Walk; Ross Round (border); Ross Buggy Route (border); Herefordshire Trail (border)  | Y            |
| Mineral Reserves  | 2                              | 1 in the East and 1 in the West of the Parish  | Y            |
| National Nature Reserve                                   | 0                              | There are no NNRs within the Parish  | N            |
| Registered & unregistered parks and gardens               | 1 Registered<br>8 Unregistered | Registered: Hill Court. Unregistered: Lincoln Hill House; John Kyrles Walk (border); Penyard Park (border); Cobrey Park; Upper Wythall; Bishopswood; Hazelhurst; Goodrich Court (border)   | Y            |
| Scheduled Ancient Monuments                               | 2                              | Camp in Chase Wood (border); Great Howle Camp  | Y            |

|                                      |   |   |   |
|--------------------------------------|---|---|---|
| Sites of Special Scientific Interest | 2 | River Wye (Unfavourable Recovering);<br>Coughton Wood & Marsh (Unfavourable Recovering) | Y |
|--------------------------------------|---|---|---|

**Decision Notification:**

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

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

**Assessment date: 21/05/2013**

**Assessed by: James Latham**

## Appendix 1: European Sites

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

|   |
|---|
| <b>Downton Gorge</b>  |
| <b>Site Features:</b> <i>Tilio-Acerion</i> forests of slopes, screes and ravines  |
| <b>Vulnerability data:</b> 10km for air quality associated with poultry units or other intensive agricultural practices.  |
| <b>River Clun</b>   |
| <b>Site Features:</b> Freshwater pearl mussel <i>Margaritifera margaritifera</i>  |
| <b>Vulnerability data:</b> Water quality is important to maintain the site feature. Parishes either side of the River Clun will be affected.  |
| <b>River Wye</b>  |
| <b>Site Features:</b> Water courses of plain to montane levels with the <i>Ranunculion fluitantis</i> and <i>Callitricho-Batrachion</i> vegetation. Transition mires and quaking bogs. White-clawed (or Atlantic Stream) crayfish <i>Austropotamobius pallipes</i> . Sea lamprey <i>Petromyzon marinus</i> . Brook lamprey <i>Lampetra planeri</i> . River lamprey <i>Lampetra fluviatilis</i> . Twaite shad <i>Alosa fallax</i> . Atlantic salmon <i>Salmo salar</i> . Bullhead <i>Cottus gobio</i> . Otter <i>Lutra lutra</i> . Allis shad <i>Alosa alosa</i>   |
| <b>Vulnerability data:</b> Proximity: Developments should not be within 100m of the designated bank. Some developments beyond 100m may also have impacts based on proximity and these issues should be addressed where possible when developing NDP policy and choosing site allocations.<br>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.<br>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.<br>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.<br>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."<br>(Source: EA website: <a href="http://www.environmentagency.gov.uk/static/documents/Business/Otters_the_facts.pdf">http://www.environmentagency.gov.uk/static/documents/Business/Otters_the_facts.pdf</a> accessed 09/04/2013) |

### Usk Bat Site

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

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

### Wye Valley and Forest of Dean Bat Sites

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

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

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

NDPs closest to the European Site will need to consider:  
Woodland habitat buffer.

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

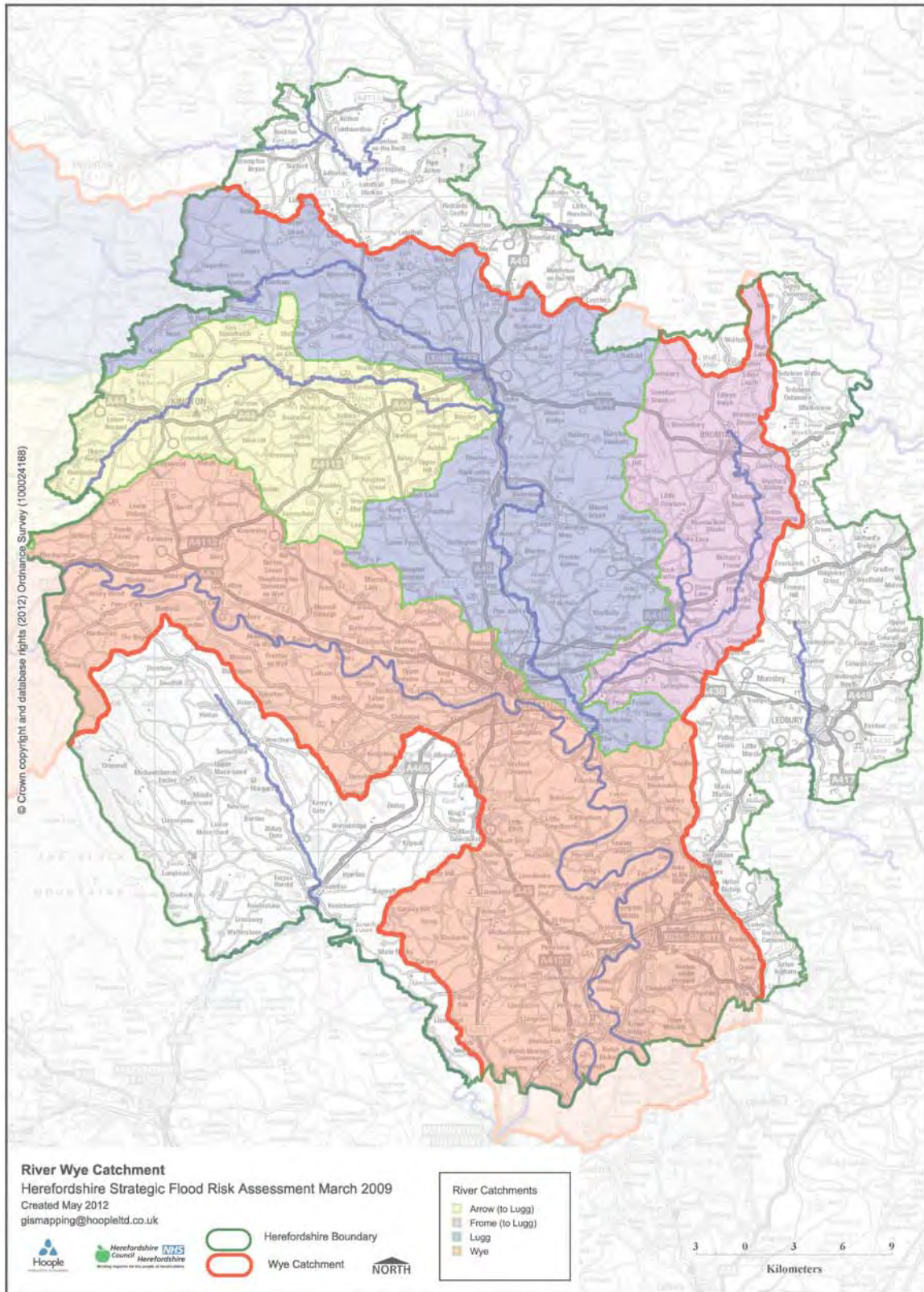
Greater Horseshoe Bat: Large buildings, pasture, edge of mixed deciduous woodland and hedgerows. Mixed land-use especially south-facing slopes, favours beetles, moths and insects they feed on. During the winter they depend on caves, abandoned mines and other underground sites for undisturbed hibernation.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

### Wye Valley Woodlands

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

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

## Appendix 2: Wye Catchment Map



# Appendix 2





Historic England

WEST MIDLANDS OFFICE

Mr James Latham  
Herefordshire Council  
Neighbourhood Planning & Strategic Planning  
Planning Services, PO Box 230, Blueschool House  
Blueschool Street  
Hereford  
HR1 2ZB

Direct Dial: 0121 625 6887

Our ref: PL00384642

22 May 2018

Dear Mr Latham

**CONSULTATION ON SEA SCOPING REPORTS FOR BRADENBURY & DISTRICT GROUP AND WALFORD NEIGHBOURHOOD PLANS**

Thank you for the invitation to comment on the SEA Scoping Reports for the Neighbourhood Plans listed above. We have no substantive objection to the contents of the documents.

The SEA Frameworks sections of the SEAs are generally commendable in their approach of including references to historic landscape and townscape quality, the maintenance of the Herefordshire SMR and conservation and wherever possible enhancement of locally significant heritage assets.

I hope this is helpful.

Yours sincerely,

Peter Boland  
Historic Places Advisor  
peter.boland@HistoricEngland.org.uk

cc:



THE AXIS 10 HOLLIDAY STREET BIRMINGHAM B1 1TF

Telephone 0121 625 6870  
HistoricEngland.org.uk



Date: 22 May 2018  
Our ref: 244954  
Your ref: Walford Group NDP



James Latham  
Herefordshire Council

Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
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CW1 6GJ

**BY EMAIL ONLY**

T 0300 060 3900

Dear Mr Latham,

**Planning consultation: Walford Group Neighbourhood Plan – SEA Scoping and HRA screening.**

Thank you for your consultation on the above dated 23/04/2018.

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 Screening**

We welcome the production of the submitted SEA report. Natural England notes and concurs with the conclusions of the report.

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](#).

**Habitats Regulations Assessment Screening**

Natural England notes the screening process applied to this Neighbourhood plan.

We agree with the Council's conclusion that a full HRA screening will be required to determine impacts on the following site:

- River Wye SAC

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 Tom Amos on 02080 260961. For any new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto: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

Tom Amos  
Planning for a Better Environment  
West Midlands Team

# Appendix 3

**Neighbourhood Plan Policy Screening – Walford Neighbourhood Plan**

| <b>Policy Number</b>  | <b>Potential effect</b>   | <b>In-combination effects</b>   | <b>Likely Significant effect<br/>(Yes/ No and state how)</b>   |
|---|---|---|--|
| <b>WALF1: Promoting Sustainable Development</b>                   | <p>This policy will not lead to development</p> <p>Policy is guiding development away from the sensitive site</p> <p>Policy is seeking to enhance and or protect the natural environment in general</p> <p>Policy is seeking to conserve, enhance or protect the built, natural and/or historic environment</p> | <p>The policy is seeking to provide criteria to enable development in an sustainable way</p>  | <p>No LSE, the policy does not lead to development</p>   |
| <b>Policy WALF2: Development Strategy</b>                         | <p>Policy itself will not lead to development</p> <p>The location of the development is currently unknown, its implementation will be subject to a planning application</p>   | <p>Seeking to deliver proportional growth during the plan period within a settlement boundary</p> <p>Increase traffic</p> <p>Increase demand on water abstraction</p> <p>Increased demand on sewerage treatment</p> | <p><b>LSE</b></p> <p><b>The policy is seeking to provide residential development within the plan period</b></p>                |
| <b>Policy WALF3: Major Development Within the Wye Valley AONB</b> | <p>Policy itself will not lead to development</p> <p>Policy is seeking to enhance and or protect the natural environment in general</p> <p>Helping to safeguard the AONB against inappropriate development .</p>  | <p>This will have a positive effect</p>   | <p>No LSE. the policy is seeking to protect the views within and around the parish and will not lead to development itself</p> |

| Policy Number   | Potential effect   | In-combination effects           | Likely Significant effect (Yes/ No and state how)  |
|---|--|----------------------------------|--|
| <b>Policy WALF4: Conserving the Landscape and Scenic Beauty of the Parish</b>                         | Policy itself will not lead to development<br>Policy is seeking to enhance and or protect the natural environment in general<br>Helping to conserve and enhance the scenic beauty.   | This will have a positive effect | No LSE. the policy is seeking to protect the views within and around the parish and will not lead to development itself  |
| <b>Policy WALF5: Protecting Important Views within the Parish and the Settings of its Settlements</b> | Policy itself will not lead to development<br>Policy is seeking to enhance and or protect the natural environment in general   | This will have a positive effect | No LSE. the policy is seeking to protect the views within and around the parish and will not lead to development itself  |
| <b>Policy WALF6: Enhancement of the Natural Environment</b>   | Policy itself will not lead to development<br><br>Policy is seeking to enhance and or protect the natural environment in general<br><br>Policy is specifically seeking to protect sensitive sites<br><br>Policy is guiding development away from the sensitive sites | This will have a positive effect | No LSE. This policy is seeking to avoid adverse effects on the River Wye SAC. The policy seeks to protect and enhance the local character of the built and historic environment of the group parish. |
| <b>Policy WALF7: Protecting Heritage Assets</b>   | Policy itself will not lead to development.<br>This policy sets out criteria to safeguard and enhance heritage assets.   | None identified.                 | No LSE. This policy sets out criteria for new development to adhere to. This policy does not lead to development itself.   |

| <b>Policy Number</b>   | <b>Potential effect</b>   | <b>In-combination effects</b> | <b>Likely Significant effect (Yes/ No and state how)</b>   |
|--|---|-------------------------------|--|
| <b>Policy WALF8: Wastewater Drainage</b>   | Policy itself will not lead to development.   | None identified.              | No LSE. This policy sets out criteria for new development to adhere to. This policy does not lead to development itself.   |
| <b>Policy WALF9: Protection from Flood Risk</b>  | Policy itself will not lead to development.   | None identified.              | No LSE. This policy sets out criteria for new development to adhere to. This policy does not lead to development itself.   |
| <b>Policy WALF10: Sustainable Design</b>   | Policy itself will not lead to development. This policy sets out sustainable design criteria for development.   | None identified.              | No LSE. This policy sets out criteria for new development to adhere to. This policy does not lead to development itself.   |
| <b>Policy WALF11: Renewable and Low Carbon Energy Generation</b>   | The location of the development is currently unknown, its implementation will be subject to a planning application.   |                               | <b>LSE The locations of any development is yet to be known</b>   |
| <b>Policy WALF12: Highway Design Requirements</b>  | Policy itself will not lead to development. Policy sets out requirements for highway design.  | None identified.              | No LSE. This policy sets out criteria for new development to adhere to. This policy does not lead to development itself.   |
| <b>Policy WALF13: Traffic Measures within the Parish</b>   | Policy itself will not lead to development.   | None identified.              | No LSE. This policy sets out criteria for new development to adhere to. This policy does not lead to development itself.   |
| <b>Policy WALF14: Protection and Enhancement of Community Facilities and Businesses serving the Local Community.</b> | Policy is seeking to conserve, enhance or protect the built, natural and/or historic environment. This policy protects the use existing community facilities in the neighbourhood area. | None identified.              | No LSE. This policy is seeking to conserve, enhance or protect the built environment. This policy is seeking to safeguard existing community facilities over the lifetime of a neighbourhood plan. |

| Policy Number   | Potential effect  | In-combination effects  | Likely Significant effect (Yes/ No and state how)  |
|---|---|---|--|
| <b>Policy WALF15: Contributions to Community Facilities.</b>      | Policy itself will not lead to development.   | None identified.  | No LSE. This policy sets out criteria for new development to adhere to. This policy does not lead to development itself. |
| <b>Policy WALF16: High Speed Broadband and Telecommunications</b> | The location of the development is currently unknown, its implementation will be subject to a planning application.         | Reduced movement  | <b>LSE The locations of any development is yet to be known</b>   |
| <b>Policy WALF17: Design and Appearance</b>                       | Policy itself will not lead to development. This policy sets out design criteria for development.                           | None identified.  | No LSE. This policy sets out criteria for new development to adhere to. This policy does not lead to development itself. |
| <b>Policy WALF18: Housing Development in Walford and Coughton</b> | The specific location of the development is currently unknown, its implementation will be subject to a planning application | Seeking to deliver proportional growth during the plan period within a settlement boundary<br><br>Increased traffic<br>Increased demand on water abstraction<br>Increase demand on sewerage treatment | <b>LSE The policy is seeking to deliver dwellings within a defined settlement boundaries of Walford and coughton.</b>    |
| <b>Policy WALF19: Housing Development in Bishopswood</b>          | The specific location of the development is currently unknown, its implementation will be subject to a planning application | Seeking to deliver proportional growth during the plan period within a settlement boundary<br><br>Increased traffic<br>Increased demand on water abstraction<br>Increase demand on sewerage treatment | <b>LSE The policy is seeking to deliver dwellings within a defined settlement boundary of Bishops wood.</b>              |

| Policy Number   | Potential effect  | In-combination effects   | Likely Significant effect (Yes/ No and state how)   |
|---|---|--|---|
| <b>Policy WALF20: Housing Development in Howle Hill</b>   | The specific location of the development is currently unknown, its implementation will be subject to a planning application | Seeking to deliver proportional growth during the plan period within a settlement boundary<br><br>Increased traffic<br>Increased demand on water abstraction<br>Increase demand on sewerage treatment  | <b>LSE</b><br><b>The policy is seeking to deliver dwellings within a defined settlement boundaries of Howle Hill.</b> |
| <b>Policy WALF21: Proposed Housing Sites</b>              | The policy and site allocation could have a likely to have an impact on water quality.                                      | Policy for housing development in line with Core Strategy targets.<br>Increase in vehicle traffic.<br>Increased demand for water abstraction and sewage treatment.<br>Erosion/ Trampling<br>Non-Physical disturbance such as noise, vibration and light pollution<br>Air pollution | <b>LSE. This site allocation could lead to significant effects on the water and environmental quality.</b>            |
| <b>Policy WALF22: Use of Rural Buildings for Business</b> | The location of the development is currently unknown, its implementation will be subject to a planning application.         | Policy to support local employment opportunities<br><br>Increased traffic<br>Increased demand for water abstraction and sewerage treatment   | <b>LSE. The locations of the rural business development is yet to be known.</b>                                       |
| <b>Policy WALF23: Polytunnel Proposals</b>                | The location of the development is currently unknown, its implementation will be subject to a planning application.         | Increased movement<br>Increased demand for water and sewerage  | <b>LSE. The locations of Poly tunnels is yet to be known.</b>   |



## Site Allocations

| Site Allocation                                   | Potential effect  | In-combination effects   | Likely Significant effect  |
|---|---|--|--|
| <b>Land at Watling Street SR24 (Allocation)</b>   | The 1.3 ha site allocation is likely to have an impact on water quality.  | <p>Policy for housing development in line with Core Strategy targets.<br/>Increase in vehicle traffic.</p> <p>Increased demand for water abstraction and sewage treatment.<br/>Erosion/ Trampling</p> <p>Non-Physical disturbance such as noise, vibration and light pollution</p> <p>Air pollution from construction and vehicle usage.</p> | <b>LSE. This site allocation could lead to significant effects on the water and environmental quality.</b> |
| <b>Land at Leys Hill SR26 (Allocation)</b>        | The 0.45 site allocation is likely to have an impact on water quality.    | <p>Policy for housing development in line with Core Strategy targets.<br/>Increase in vehicle traffic.<br/>Increased demand for water abstraction and sewage treatment.</p> <p>Erosion/ Trampling</p> <p>Non-Physical disturbance such as noise, vibration and light pollution</p> <p>Air pollution from construction and vehicle usage.</p> | <b>LSE. This site allocation could lead to significant effects on the water and environmental quality.</b> |
| <b>Arthurs Dingle Leys Hill SR32 (Allocation)</b> | The 0.65 ha site allocation is 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>  | <b>LSE. This site allocation could lead to significant effects on the water and environmental quality.</b> |

|  |   |   |   |
|--|---|---|---|
|  |   | <p>Erosion/ Trampling of site</p> <p>Non-Physical disturbance such as noise, vibration and light pollution</p> <p>Air pollution from construction and vehicle usage.</p>  |   |
| <p><b>Lower Field of Orchard Heights SR34 (Allocation)</b></p> | <p>The 0.8 ha site allocation is likely to have an impact on water quality.</p> | <p>Policy for housing development in line with Core Strategy targets. Increase in vehicle traffic.</p> <p>Increased demand for water abstraction and sewage treatment.</p> <p>Erosion/ Trampling</p> <p>Non-Physical disturbance such as noise, vibration and light pollution</p> <p>Air pollution from construction and vehicle usage.</p> | <p><b>LSE. This site allocation could lead to significant effects on the water and environmental quality.</b></p> |

## Appropriate Assessment policy assessment – Walford Neighbourhood Plan

### Neighbourhood Plan Policy: Policy WALF2: Development Strategy

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

Possible Mitigation measures

| Mitigation                       | Description  |
|----------------------------------|--|
| Main sewerage system             | <p>There is no mains drainage within the settlements of Bishopswood and Howle Hill. Coughton is only covered by mains drainage, served by Ross Lower Cleeve WwTw.</p> <p>The areas within the settlement boundaries for Bishopswood and Howle Hill and the site allocations are not covered by the main sewerage area.</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 proportional growth requirement is within the expected for the Ross-on-Wye Market area within the Core Strategy and agreed by Welsh Water.</p> <p>Welsh Water have and are continuing to include phosphate stripping in a number of WwTw across the county. This will have a positive impact on the catchment in general.</p> <p>However, the majority of development within these settlement boundaries are not connected to WWTW.</p> <p>Specific foul and water management strategy will be needed within all proposals which needs to be agreed upon in writing by the Local Planning Authority.</p>  |
| Integrated Wetlands              | <p>A programme of delivering integrated wetlands is planned to create several wetlands to aid the reduction of phosphate within the catchment. The delivery of a number of these wetlands will be within the plan period. Any wetland will need to be upstream of the proposal to form potential mitigation.</p>   |
| Revised Nutrient Management Plan | <p>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.</p>  |
| 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 Councils website since March 2021 and can be found on the link below</p> <p><a href="https://www.herefordshire.gov.uk/downloads/file/22211/interim-phosphate-delivery-plan-stage-2-non-technical-summary">https://www.herefordshire.gov.uk/downloads/file/22211/interim-phosphate-delivery-plan-stage-2-non-technical-summary</a></p> |
| Other - considerations           | <p>The west side of the parish borders the River Wye.</p> <p>Policy WALF6, seeks to conserve and protect and enhance the landscape, biodiversity and conserve the scenic beauty of the parish, including watercourses. This policy contains nutrient neutrality criteria to ensure development will only be granted where it will not increase the nutrient inputs in the SAC.</p> <p>The some of the proportionate growth requirements within the Core Strategy, have already been met by existing commitments.</p>   |

|                         |  |
|-------------------------|--|
| In-combination policies | <p>The policy does not grant permission or lead to development in itself. It is seeking to comply with the proportional growth requirements of the Core Strategy Policy RA2.</p> <p>The policy criteria within Policy WALF 8 and 9 includes the requirement for suitable sustainable drainage or wet systems. Criteria contained in WALF6 requires all developments to have nutrient neutrality. A planning application will be required and any application will need to meet the requirements of Policy SD4 and Policies WALF 6, WALF8 and WALF9.</p> <p>Policy SD4 required all developments to meet criteria to not undermine the water quality objectives of the SAC.</p> |
|-------------------------|--|

Residual effects – Having taken the above mitigation measures into account, it is considered that there the NDP has appropriate mitigation measures, particularly around water quality. The proportional growth requirements for the parish have been met with commitment and completions, four site allocations and expected windfall. Additional reference to the need for an agreed foul and surface water management strategy with an application would ensure the likely significant effects of the development plan policies have been removed. There are not residual outstanding effects.

Conclusion – The delineation of settlement boundaries within the plan does not directly lead to development. All infill sites within the boundary and housing within the ‘open countryside’ require a planning application. Foul and surface drainage management strategy has been included in policies WALF6, WALF8 and WALF9. Therefore a conclusion of no likely significant effects would result with regards to the Walford NDP Policy.

**Neighbourhood Plan Policy: Policy WALF11: Renewable and Low Carbon Energy Generation**

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

Possible Mitigation measures

| Mitigation                       | Description   |
|----------------------------------|---|
| Main sewerage system             | <p>There is no mains drainage within the settlements of Bishopswood and Howle Hill. Coughton is only covered by mains drainage, served by Ross Lower Cleeve WwTw.</p> <p>The areas within the settlement boundaries for Bishopswood and Howle Hill and the site allocations are not covered by the main sewerage area. Coughton is only covered by mains drainage, served by Ross Lower Cleeve WwTw.</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 proportional growth requirement is within the expected for the Ross-on-Wye Market area within the Core Strategy and agreed by Welsh Water. Welsh Water have and are continuing to include phosphate stripping in a number of WwTw across the county. This will have a positive impact on the catchment in general.</p> <p>However, the majority of the development within these settlement boundaries are not connected to WWTW.</p> <p>Specific foul and water management strategy will be needed within all proposals which needs to be agreed upon in writing by the Local Planning Authority.</p>                                    |
| Integrated Wetlands              | <p>A programme of delivering integrated wetlands is planned to create several wetlands to aid the reduction of phosphate within the catchment. The delivery of a number of these wetlands will be within the plan period. Any wetland will need to be upstream of the proposal to form potential mitigation.</p>  |
| Revised Nutrient Management Plan | <p>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.</p>   |
| Interim Phosphate Plan Stage 2   | <p>This document provides a range of potential mitigation solutions that could used within the parish. A set of recommendations are included to provide a robust solution to achieve nutrient neutral residential developments. This document has been available on the Councils website since March 2021 and can be found on the link below<br/> <a href="https://www.herefordshire.gov.uk/downloads/file/22211/interim-phosphate-delivery-plan-stage-2-non-technical-summary">https://www.herefordshire.gov.uk/downloads/file/22211/interim-phosphate-delivery-plan-stage-2-non-technical-summary</a></p>                                     |
| Other - considerations           | <p>The west side of the parish borders the River Wye. Policy WALF6, seeks to conserve and protect and enhance the landscape, biodiversity and conserve the scenic beauty of the parish, including watercourses. The policy contains nutrient neutrality criteria to ensure development will only be granted where it will not increase the nutrient inputs in the SAC.</p>  |

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|                         | The some of the proportionate growth requirements within the Core Strategy, have already been met by existing commitments.   |
| In-combination policies | <p>The policy does not grant permission or lead to development in itself. It is seeking to comply with the proportional growth requirements of the Core Strategy Policy RA2.</p> <p>The policy criteria within Policy WALF 8 and 9 includes the requirement for suitable sustainable drainage or wet systems. Criteria contained in WALF6 requires all developments to have nutrient neutrality. A planning application will be required and any application will need to meet the requirements of Policy SD4 and Policies WALF 6, WALF8 and WALF9.</p> <p>Policy SD4 required all developments to meet criteria to not undermine the water quality objectives of the SAC.</p> |

Residual effects – Having taken the above mitigation measures into account, it is considered that there the NDP has appropriate mitigation measures, particularly around water quality. For new developments additional reference to the need for an agreed foul and surface water management strategy with an application would ensure the likely significant effects of the development plan policies have been removed. There are no residual outstanding effects.

Conclusion – All sites developing renewable energy and low carbon schemes require a planning application. The criteria for business development as specified within the plan does not directly lead to development. All future development will require a planning application, which demonstrates that the Policy SD3, SD4 and Policy WALF6, WALF 8 and WALF 9 have been met, and taking into account the mitigation measures highlighted above it is concluded that no likely significant effects would result. Foul and surface drainage management strategy has been included in policies WALF6, WALF8 and WALF9. Therefore a conclusion of no likely significant effects would result with regards to the Walford NDP Policy.

## Neighbourhood Plan Policy: Policy WALF16: High Speed Broadband and Telecommunications

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

| Mitigation                       | Description  |
|----------------------------------|--|
| Main sewerage system             | <p>There is no mains drainage within the settlements of Bishopswood and Howle Hill. Coughton is only covered by mains drainage, served by Ross Lower Cleeve WwTw.</p> <p>The areas within the settlement boundaries for Bishopswood and Howle Hill and the site allocations are not covered by the main sewerage area.</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 proportional growth requirement is within that expected for the Ross-on-Wye Market area within the Core Strategy and agreed by Welsh Water.</p> <p>Welsh Water have and are continuing to include phosphate stripping in a number of WwTw across the county. This will have a positive impact on the catchment in general.</p> <p>However, the majority of development within these settlement boundaries are not connected to WWTW.</p> <p>Specific foul and water management strategy will be needed within all proposals which needs to be agreed upon in writing by the Local Planning Authority.</p> |
| Integrated Wetlands              | <p>A programme of delivering integrated wetlands is planned to create several wetlands to aid the reduction of phosphate within the catchment. The delivery of a number of these wetlands will be within the plan period. Any wetland will need to be upstream of the proposal to form potential mitigation.</p>   |
| Revised Nutrient Management Plan | <p>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.</p>  |
| 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 Councils website since March 2021 and can be found on the link below</p> <p><a href="https://www.herefordshire.gov.uk/downloads/file/22211/interim-phosphate-delivery-plan-stage-2-non-technical-summary">https://www.herefordshire.gov.uk/downloads/file/22211/interim-phosphate-delivery-plan-stage-2-non-technical-summary</a></p> |
| Other - considerations           | <p>The west side of the parish borders the River Wye</p> <p>Policy WALF6, seeks to conserve and protect and enhance the landscape, biodiversity and conserve the scenic beauty of the parish, including watercourses. The policy contains nutrient neutrality criteria to ensure development will only be granted where it will not increase the nutrient inputs in the SAC.</p>   |

|                         |  |
|-------------------------|--|
|                         | The some of the proportionate growth requirements within the Core Strategy, have already been met by existing commitments.   |
| In-combination policies | <p>The policy does not grant permission or lead to development in itself. It is seeking to comply with the proportional growth requirements of the Core Strategy Policy RA2.</p> <p>The policy criteria within Policy WALF 8 and 9 includes the requirement for suitable sustainable drainage or wet systems. Criteria contained in WALF6 requires all developments to have nutrient neutrality. A planning application will be required and any application will need to meet the requirements of Policy SD4 and Policies WALF 6, WALF8 and WALF9.</p> <p>Policy SD4 required all developments to meet criteria to not undermine the water quality objectives of the SAC.</p> |

Residual effects – Having taken the above mitigation measures into account, it is considered that there the NDP has appropriate mitigation measures, particularly around water quality. For new developments additional reference to the need for an agreed foul and surface water management strategy with an application would ensure the likely significant effects of the development plan policies have been removed. There are no residual outstanding effects.

Conclusion – All sites developing broadband and telecommunications require a planning application. The criteria for business development as specified within the plan does not directly lead to development. All future development will require a planning application, which demonstrates that the Policy SD3, SD4 and Policy WALF6, WALF 8 and WALF 9 have been met, and taking into account the mitigation measures highlighted above it is concluded that no likely significant effects would result. Foul and surface drainage management strategy has been included in policies WALF6, WALF8 and WALF9. Therefore a conclusion of no likely significant effects would result with regards to the Walford NDP Policy.



## Neighbourhood Plan Policy: Policy WALF18: Housing Development in Walford and Coughton

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

Possible Mitigation measures

| Mitigation                       | Description  |
|----------------------------------|--|
| Main sewerage system             | <p>Walford Coughton is partially serviced by mains drainage. The areas within the settlement boundaries for Bishopswood and Howle Hill and the site allocations are not covered by the main sewerage area. Walford Coughton is only covered by mains drainage, served by Ross Lower Cleeve WwTw.</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 proportional growth requirement is within that expected for the Ross-on-Wye Market area within the Core Strategy and agreed by Welsh Water. Welsh Water have and are continuing to include phosphate stripping in a number of WwTw across the county. This will have a positive impact on the catchment in general.</p> <p>However, the majority of the development within the settlement boundary are not connected to WWTW.</p> <p>Specific foul and water management strategy will be needed within all proposals which needs to be agreed upon in writing by the Local Planning Authority.</p>        |
| Integrated Wetlands              | <p>A programme of delivering integrated wetlands is planned to create several wetlands to aid the reduction of phosphate within the catchment. The delivery of a number of these wetlands will be within the plan period. Any wetland will need to be upstream of the proposal to form potential mitigation.</p>   |
| Revised Nutrient Management Plan | <p>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.</p>  |
| 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 Councils website since March 2021 and can be found on the link below</p> <p><a href="https://www.herefordshire.gov.uk/downloads/file/22211/interim-phosphate-delivery-plan-stage-2-non-technical-summary">https://www.herefordshire.gov.uk/downloads/file/22211/interim-phosphate-delivery-plan-stage-2-non-technical-summary</a></p> |
| Other - considerations           | <p>The west side of the parish borders the River Wye.</p> <p>Policy WALF6, seeks to conserve and protect and enhance the landscape, biodiversity and conserve the scenic beauty of the parish, including watercourses. The policy contains nutrient neutrality criteria to ensure development will only be granted where it will not increase the nutrient inputs in the SAC.</p> <p>The some of the proportionate growth requirements within the Core Strategy, have already been met by existing commitments.</p>  |

|                         |  |
|-------------------------|--|
| In-combination policies | <p>The policy does not grant permission or lead to development in itself. It is seeking to comply with the proportional growth requirements of the Core Strategy Policy RA2.</p> <p>The policy criteria within Policy WALF 8 and 9 includes the requirement for suitable sustainable drainage or wet systems. Criteria contained in WALF6 requires all developments to have nutrient neutrality. A planning application will be required and any application will need to meet the requirements of Policy SD4 and Policies WALF 6, WALF8 and WALF9.</p> <p>Policy SD4 required all developments to meet criteria to not undermine the water quality objectives of the SAC.</p> |
|-------------------------|--|

Residual effects – Having taken the above mitigation measures into account, it is considered that there the NDP has appropriate mitigation measures, particularly around water quality. The proportional growth requirements for the parish have been met with commitment and completions, four site allocations, and expected windfall. Additional reference to the need for an agreed foul and surface water management strategy with an application would ensure the likely significant effects of the development plan policies have been removed. There are not residual outstanding effects.

Conclusion – The delineation of settlement boundary in Coughton Walford within the plan does not directly lead to development. All infill sites within the boundary and housing within the 'open countryside' require a planning application. Foul and surface drainage management strategy has been included in policies WALF6, WALF8 and WALF9. Therefore a conclusion of no likely significant effects would result with regards to the Walford NDP Policy.

## Neighbourhood Plan Policy: Policy WALF19: Housing Development in Bishopswood

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

| Mitigation                       | Description   |
|----------------------------------|---|
| Main sewerage system             | <p>There is no mains drainage within the village of Bishopswood. The areas within the settlement boundaries for Bishopswood and the site allocations are not covered by the main sewerage area.</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 proportional growth requirement is within that expected for the Ross-on-Wye Market area within the Core Strategy and agreed by Welsh Water. Welsh Water have and are continuing to include phosphate stripping in a number of WwTw across the county. This will have a positive impact on the catchment in general.</p> <p>However, the development within the settlement boundary is not connected to WWTW.</p> <p>Specific foul and water management strategy will be needed within all proposals which needs to be agreed upon in writing by the Local Planning Authority.</p>                      |
| Integrated Wetlands              | <p>A programme of delivering integrated wetlands is planned to create several wetlands to aid the reduction of phosphate within the catchment. The delivery of a number of these wetlands will be within the plan period. Any wetland will need to be upstream of the proposal to form potential mitigation.</p>  |
| Revised Nutrient Management Plan | <p>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.</p>   |
| Interim Phosphate Plan Stage 2   | <p>This document provides a range of potential mitigation solutions that could used within the parish. A set of recommendations are included to provide a robust solution to achieve nutrient neutral residential developments. This document has been available on the Councils website since March 2021 and can be found on the link below</p> <p><a href="https://www.herefordshire.gov.uk/downloads/file/22211/interim-phosphate-delivery-plan-stage-2-non-technical-summary">https://www.herefordshire.gov.uk/downloads/file/22211/interim-phosphate-delivery-plan-stage-2-non-technical-summary</a></p> |
| Other - considerations           | <p>The west side of the parish borders the River Wye</p> <p>Policy WALF6, seeks to conserve and protect and enhance the landscape, biodiversity and conserve the scenic beauty of the parish, including watercourses. The policy contains nutrient neutrality criteria to ensure development will only be granted where it will not increase the nutrient inputs in the SAC.</p> <p>The some of the proportionate growth requirements within the Core Strategy, have already been met by existing commitments.</p>  |

|                         |  |
|-------------------------|--|
| In-combination policies | <p>The policy does not grant permission or lead to development in itself. It is seeking to comply with the proportional growth requirements of the Core Strategy Policy RA2.</p> <p>The policy criteria within Policy WALF 8 and 9 includes the requirement for suitable sustainable drainage or wet systems. Criteria contained in WALF6 requires all developments to have nutrient neutrality. A planning application will be required and any application will need to meet the requirements of Policy SD4 and Policies WALF 6, WALF8 and WALF9.</p> <p>Policy SD4 required all developments to meet criteria to not undermine the water quality objectives of the SAC.</p> |
|-------------------------|--|

Residual effects – Having taken the above mitigation measures into account, it is considered that there the NDP has appropriate mitigation measures, particularly around water quality. The proportional growth requirements for the parish have been met with commitment and completions, four site allocations and expected windfall. Additional reference to the need for an agreed foul and surface water management strategy with an application would ensure the likely significant effects of the development plan policies have been removed. There are not residual outstanding effects.

Conclusion – The delineation of settlement boundary in Bishopswood within the plan does not directly lead to development. All infill sites within the boundary and housing within the ‘open countryside’ require a planning application. Foul and surface drainage management strategy has been included in policies WALF6, WALF8 and WALF9. Therefore a conclusion of no likely significant effects would result with regards to the Walford NDP Policy.

## Neighbourhood Plan Policy: Policy WALF20: Housing Development in Howle Hill

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

Possible Mitigation measures

| Mitigation                       | Description   |
|----------------------------------|---|
| Main sewerage system             | <p>There is no mains drainage within the village of Howle Hill.</p> <p>The areas within the settlement boundary for Howle Hill and the site allocations are not covered by the main sewerage area. Coughton is only covered by mains drainage, served by Ross Lower Cleeve WwTw.</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 proportional growth requirement is within that expected for the Ross-on-Wye Market area within the Core Strategy and agreed by Welsh Water.</p> <p>Welsh Water have and are continuing to include phosphate stripping in a number of WwTw across the county. This will have a positive impact on the catchment in general.</p> <p>However, the development within these settlement boundary is not connected to WWTW.</p> <p>Specific foul and water management strategy will be needed within all proposals which needs to be agreed upon in writing by the Local Planning Authority.</p>             |
| Integrated Wetlands              | <p>A programme of delivering integrated wetlands is planned to create several wetlands to aid the reduction of phosphate within the catchment. The delivery of a number of these wetlands will be within the plan period. Any wetland will need to be upstream of the proposal to form potential mitigation.</p>  |
| Revised Nutrient Management Plan | <p>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.</p>   |
| Interim Phosphate Plan Stage 2   | <p>This document provides a range of potential mitigation solutions that could used within the parish. A set of recommendations are included to provide a robust solution to achieve nutrient neutral residential developments. This document has been available on the Councils website since March 2021 and can be found on the link below</p> <p><a href="https://www.herefordshire.gov.uk/downloads/file/22211/interim-phosphate-delivery-plan-stage-2-non-technical-summary">https://www.herefordshire.gov.uk/downloads/file/22211/interim-phosphate-delivery-plan-stage-2-non-technical-summary</a></p> |
| Other - considerations           | <p>The west side of the parish borders the River Wye</p> <p>Policy WALF6, seeks to conserve and protect and enhance the landscape, biodiversity and conserve the scenic beauty of the parish, including watercourses. The policy contains nutrient neutrality criteria to ensure development will only be granted where it will not increase the nutrient inputs in the SAC.</p> <p>The some of the proportionate growth requirements within the Core Strategy, have already been met by existing commitments.</p>  |

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|-------------------------|--|
| In-combination policies | <p>The policy does not grant permission or lead to development in itself. It is seeking to comply with the proportional growth requirements of the Core Strategy Policy RA2.</p> <p>The policy criteria within Policy WALF 8 and 9 includes the requirement for suitable sustainable drainage or wet systems. Criteria contained in WALF6 requires all developments to have nutrient neutrality. A planning application will be required and any application will need to meet the requirements of Policy SD4 and Policies WALF 6, WALF8 and WALF9.</p> <p>Policy SD4 required all developments to meet criteria to not undermine the water quality objectives of the SAC.</p> |
|-------------------------|--|

Residual effects – Having taken the above mitigation measures into account, it is considered that there the NDP has appropriate mitigation measures, particularly around water quality. The proportional growth requirements for the parish have been met with commitment and completions, four site allocations and expected windfall. Additional reference to the need for an agreed foul and surface water management strategy with an application would ensure the likely significant effects of the development plan policies have been removed. There are no residual outstanding effects.

Conclusion – The delineation of settlement boundary in Howle Hill within the plan does not directly lead to development. All infill sites within the boundary and housing within the ‘open countryside’ require a planning application. Foul and surface drainage management strategy has been included in policies WALF6, WALF8 and WALF9. Therefore a conclusion of no likely significant effects would result with regards to the Walford NDP Policy.

## Neighbourhood Plan Policy: Policy WALF21: Proposed Housing Sites

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

Possible Mitigation measures.

| Mitigation                       | Description   |
|----------------------------------|---|
| Main sewerage system             | <p>There is no mains drainage within the settlements of Bishopswood and Howle. Hill, Walford Coughton is partially serviced by mains drainage. The areas within the settlement boundaries for Bishopswood and Howle Hill and the site allocations are not covered by the main sewerage area. Coughton is only covered by mains drainage, served by Ross Lower Cleeve WwTw.</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 proportional growth requirement is within that expected for the Ross-on-Wye Market area within the Core Strategy and agreed by Welsh Water. Welsh Water have and are continuing to include phosphate stripping in a number of WwTw across the county. This will have a positive impact on the catchment in general.</p> <p>However, the majority of development within these settlement boundaries are not connected to WWTW.</p> <p>Specific foul and water management strategy will be needed within all proposals which need to be agreed upon in writing by the Local Planning Authority.</p>              |
| Integrated Wetlands              | <p>A programme of delivering integrated wetlands is planned to create several wetlands to aid the reduction of phosphate within the catchment. The delivery of a number of these wetlands will be within the plan period. Any wetland will need to be upstream of the proposal to form potential mitigation.</p>  |
| Revised Nutrient Management Plan | <p>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.</p>   |
| Interim Phosphate Plan Stage 2   | <p>This document provides a range of potential mitigation solutions that could used within the parish. A set of recommendations are included to provide a robust solution to achieve nutrient neutral residential developments. This document has been available on the Councils website since March 2021 and can be found on the link below</p> <p><a href="https://www.herefordshire.gov.uk/downloads/file/22211/interim-phosphate-delivery-plan-stage-2-non-technical-summary">https://www.herefordshire.gov.uk/downloads/file/22211/interim-phosphate-delivery-plan-stage-2-non-technical-summary</a></p>         |
| Other - considerations           | <p>The west side of the parish borders the River Wye</p> <p>Policy WALF6, seeks to conserve and protect and enhance the landscape, biodiversity and conserve the scenic beauty of the parish, including watercourses. The policy contains nutrient neutrality criteria to ensure development will only be granted where it will not increase the nutrient inputs in the SAC.</p>  |

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|-------------------------|--|
|                         | The some of the proportionate growth requirements within the Core Strategy, have already been met by existing commitments.   |
| In-combination policies | <p>The policy does not grant permission or lead to development in itself. It is seeking to comply with the proportional growth requirements of the Core Strategy Policy RA2.</p> <p>The policy criteria within Policy WALF 8 and 9 includes the requirement for suitable sustainable drainage or wet systems. Criteria contained in WALF6 requires all developments to have nutrient neutrality. A planning application will be required and any application will need to meet the requirements of Policy SD4 and Policies WALF 6, WALF8 and WALF9.</p> <p>Policy SD4 required all developments to meet criteria to not undermine the water quality objectives of the SAC.</p> |

Residual effects – Having taken the above mitigation measures into account, it is considered that there the NDP has appropriate mitigation measures, particularly around water quality. The proportional growth requirements for the parish have been met with commitment and completions, four site allocations and expected windfall. Additional reference to the need for an agreed foul and surface water management strategy with an application would ensure the likely significant effects of the development plan policies have been removed. There are not residual outstanding effects.

Conclusion – The delineation of settlement boundaries and site allocations within the plan does not directly lead to development. All infill sites within the boundary and housing within the ‘open countryside’ require a planning application. Foul and surface drainage management strategy has been included in policies WALF6, WALF8 and WALF9. Therefore a conclusion of no likely significant effects would result with regards to the Walford NDP Policy.



## Neighbourhood Plan Policy: Policy WALF22: Use of Rural Buildings for Business

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

Possible Mitigation measures

| Mitigation                       | Description  |
|----------------------------------|--|
| Main sewerage system             | <p>There is no mains drainage within the settlements of Bishopswood and Howle. Hill, Walford Coughton is partially serviced by mains drainage.</p> <p>The areas within the settlement boundaries for Bishopswood and Howle Hill and the site allocations are not covered by the main sewerage area. Coughton is only covered by mains drainage, served by Ross Lower Cleeve WwTw.</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 proportional growth requirement is within that expected for the Ross-on-Wye Market area within the Core Strategy and agreed by Welsh Water. Welsh Water have and are continuing to include phosphate stripping in a number of WwTw across the county. This will have a positive impact on the catchment in general.</p> <p>However, the majority of development within the identified settlement boundaries are not connected to WWTW.</p> <p>Specific foul and water management strategy will be needed within all proposals which needs to be agreed upon in writing by the Local Planning Authority.</p>           |
| Integrated Wetlands              | <p>A programme of delivering integrated wetlands is planned to create several wetlands to aid the reduction of phosphate within the catchment. The delivery of a number of these wetlands will be within the plan period. Any wetland will need to be upstream of the proposal to form potential mitigation.</p>   |
| Revised Nutrient Management Plan | <p>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.</p>  |
| 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 Councils website since March 2021 and can be found on the link below</p> <p><a href="https://www.herefordshire.gov.uk/downloads/file/22211/interim-phosphate-delivery-plan-stage-2-non-technical-summary">https://www.herefordshire.gov.uk/downloads/file/22211/interim-phosphate-delivery-plan-stage-2-non-technical-summary</a></p>             |
| Other - considerations           | <p>The west side of the parish borders the River Wye</p> <p>Policy WALF6, seeks to conserve and protect and enhance the landscape, biodiversity and conserve the scenic beauty of the parish, including watercourses. The policy contains nutrient neutrality criteria to ensure development will only be granted where it will not increase the nutrient inputs in the SAC.</p>   |

|                         |  |
|-------------------------|--|
|                         | The some of the proportionate growth requirements within the Core Strategy, have already been met by existing commitments.   |
| In-combination policies | <p>The policy does not grant permission or lead to development in itself. It is seeking to comply with the proportional growth requirements of the Core Strategy Policy RA2.</p> <p>The policy criteria within Policy WALF 8 and 9 includes the requirement for suitable sustainable drainage or wet systems. Criteria contained in WALF6 requires all developments to have nutrient neutrality. A planning application will be required and any application will need to meet the requirements of Policy SD4 and Policies WALF 6, WALF8 and WALF9.</p> <p>Policy SD4 required all developments to meet criteria to not undermine the water quality objectives of the SAC.</p> |

Residual effects – Having taken the above mitigation measures into account, it is considered that there the NDP has appropriate mitigation measures, particularly around water quality. For new developments additional reference to the need for an agreed foul and surface water management strategy with an application would ensure the likely significant effects of the development plan policies have been removed. There are no residual outstanding effects.

Conclusion –Above permitted development regulations some changes of use to change to a business require a planning application. The criteria for business development as specified within the plan does not directly lead to development. All future development will require a planning application, which demonstrates that the Policy SD3, SD4 and Policy WALF6, WALF 8 and WALF 9 have been met, and taking into account the mitigation measures highlighted above it is concluded that no likely significant effects would result. Foul and surface drainage management strategy has been included in policies WALF6, WALF8 and WALF9. Therefore a conclusion of no likely significant effects would result with regards to the Walford NDP Policy.

## Neighbourhood Plan Policy: Policy WALF23: Polytunnel Proposals

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

Possible Mitigation measures

| Mitigation                       | Description   |
|----------------------------------|---|
| Main sewerage system             | <p>There is no mains drainage within the settlements of Bishopswood and Howle. Hill, Walford Coughton is partially serviced by mains drainage. Coughton is only covered by mains drainage, served by Ross Lower Cleeve WwTw.</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 proportional growth requirement is within that expected for the Ross-on-Wye Market area within the Core Strategy and agreed by Welsh Water. Welsh Water have and are continuing to include phosphate stripping in a number of WwTw across the county. This will have a positive impact on the catchment in general.</p> <p>However, the majority of development within these settlement boundaries are not connected to WWTW.</p> <p>Specific foul and water management strategy will be needed within all proposals which needs to be agreed upon in writing by the Local Planning Authority.</p>     |
| Integrated Wetlands              | <p>A programme of delivering integrated wetlands is planned to create several wetlands to aid the reduction of phosphate within the catchment. The delivery of a number of these wetlands will be within the plan period. Any wetland will need to be upstream of the proposal to form potential mitigation.</p>  |
| Revised Nutrient Management Plan | <p>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.</p>   |
| Interim Phosphate Plan Stage 2   | <p>This document provides a range of potential mitigation solutions that could used within the parish. A set of recommendations are included to provide a robust solution to achieve nutrient neutral residential developments. This document has been available on the Councils website since March 2021 and can be found on the link below</p> <p><a href="https://www.herefordshire.gov.uk/downloads/file/22211/interim-phosphate-delivery-plan-stage-2-non-technical-summary">https://www.herefordshire.gov.uk/downloads/file/22211/interim-phosphate-delivery-plan-stage-2-non-technical-summary</a></p> |
| Other - considerations           | <p>The west side of the parish borders the River Wye</p> <p>Policy WALF6, seeks to conserve and protect and enhance the landscape, biodiversity and conserve the scenic beauty of the parish, including watercourses. The policy contains nutrient neutrality criteria to ensure development will only be granted where it will not increase the nutrient inputs in the SAC.</p> <p>The some of the proportionate growth requirements within the Core Strategy, have already been met by existing commitments.</p>  |

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| In-combination policies | <p>The policy does not grant permission or lead to development in itself. It is seeking to comply with the proportional growth requirements of the Core Strategy Policy RA2.</p> <p>The policy criteria within Policy WALF 8 and 9 includes the requirement for suitable sustainable drainage or wet systems. Criteria contained in WALF6 requires all developments to have nutrient neutrality. A planning application will be required and any application will need to meet the requirements of Policy SD4 and Policies WALF 6, WALF8 and WALF9.</p> <p>Policy SD4 required all developments to meet criteria to not undermine the water quality objectives of the SAC.</p> |
|-------------------------|--|

Residual effects – Having taken the above mitigation measures into account, it is considered that there the NDP has appropriate mitigation measures, particularly around water quality. For new developments additional reference to the need for an agreed foul and surface water management strategy with an application would ensure the likely significant effects of the development plan policies have been removed. There are no residual outstanding effects.

Conclusion –Above poly-tunnel developments require a planning application. The criteria for business development as specified within the plan does not directly lead to development. All future development will require a planning application, which demonstrates that the Policy SD3, SD4 and Policy WALF6, WALF 8 and WALF 9 have been met, and taking into account the mitigation measures highlighted above it is concluded that no likely significant effects would result. Foul and surface drainage management strategy has been included in policies WALF8 and WALF9. Therefore a conclusion of no likely significant effects would result with regards to the Walford NDP Policy.

## Neighbourhood Plan Site Allocation: Land at Watling Street SR24 (Allocation)

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

Possible Mitigation measures

| Mitigation                       | Description  |
|----------------------------------|--|
| Main sewerage system             | <p>There is no mains drainage within the village of Bishopswood, Walford Coughton is partially serviced by mains drainage.</p> <p>The areas within the settlement boundaries for Bishopswood and Howle Hill and the site allocations are not covered by the main sewerage area. Coughton is only covered by mains drainage, served by Ross Lower Cleeve WwTw.</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 proportional growth requirement is within that expected for the Ross-on-Wye Market area within the Core Strategy and agreed by Welsh Water. Welsh Water have and are continuing to include phosphate stripping in a number of WwTw across the county. This will have a positive impact on the catchment in general.</p> <p>However, the development within these settlement boundaries are not connected to WWTW.</p> <p>Specific foul and water management strategy will be needed within all proposals which needs to be agreed upon in writing by the Local Planning Authority.</p>                    |
| Integrated Wetlands              | <p>A programme of delivering integrated wetlands is planned to create several wetlands to aid the reduction of phosphate within the catchment. The delivery of a number of these wetlands will be within the plan period. Any wetland will need to be upstream of the proposal to form potential mitigation.</p>   |
| Revised Nutrient Management Plan | <p>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.</p>  |
| 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 Councils website since March 2021 and can be found on the link below</p> <p><a href="https://www.herefordshire.gov.uk/downloads/file/22211/interim-phosphate-delivery-plan-stage-2-non-technical-summary">https://www.herefordshire.gov.uk/downloads/file/22211/interim-phosphate-delivery-plan-stage-2-non-technical-summary</a></p> |
| Other - considerations           | <p>The west side of the parish borders the River Wye</p> <p>Policy WALF6, seeks to conserve and protect and enhance the landscape, biodiversity and conserve the scenic beauty of the parish, including watercourses. The policy contains nutrient neutrality criteria to ensure development will only be granted where it will not increase the nutrient inputs in the SAC.</p>   |

|                         |  |
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|                         | The some of the proportionate growth requirements within the Core Strategy, have already been met by existing commitments.   |
| In-combination policies | <p>The policy does not grant permission or lead to development in itself. It is seeking to comply with the proportional growth requirements of the Core Strategy Policy RA2.</p> <p>The policy criteria within Policy WALF 8 and 9 includes the requirement for suitable sustainable drainage or wet systems. Criteria contained in WALF6 requires all developments to have nutrient neutrality. A planning application will be required and any application will need to meet the requirements of Policy SD4 and Policies WALF 6, WALF8 and WALF9.</p> <p>Policy SD4 required all developments to meet criteria to not undermine the water quality objectives of the SAC.</p> |

Residual effects – Having taken the above mitigation measures into account, it is considered that there the NDP has appropriate mitigation measures, particularly around water quality. The proportional growth requirements for the parish have been met with commitment and completions, four site allocations and expected windfall. Additional reference to the need for an agreed foul and surface water management strategy with an application would ensure the likely significant effects of the development plan policies have been removed. There are not residual outstanding effects.

Conclusion – The delineation of settlement boundaries and site allocations within the plan does not directly lead to development. All infill sites within the boundary and housing within the ‘open countryside’ require a planning application. Foul and surface drainage management strategy has been included in policies WALF6, WALF8 and WALF9. Therefore a conclusion of no likely significant effects would result with regards to the Walford NDP Policy.

## Neighbourhood Plan Site Allocation: Land at Leys Hill SR26 (Allocation)

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

| Mitigation                       | Description   |
|----------------------------------|---|
| Main sewerage system             | <p>There is no mains drainage within the village of Bishopswood.</p> <p>The areas within the settlement boundaries for Bishopswood site allocations are not covered by the main sewerage area, therefore it is expected for developed to be covered by private treatment facilities.</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 proportional growth requirement is within that expected for the Ross-on-Wye Market area within the Core Strategy and agreed by Welsh Water.</p> <p>Welsh Water have and are continuing to include phosphate stripping in a number of WwTw across the county. This will have a positive impact on the catchment in general.</p> <p>However, development within the settlement boundaries and site allocations are not connected to WWTW.</p> <p>Specific foul and water management strategy will be needed within all proposals which needs to be agreed upon in writing by the Local Planning Authority.</p> |
| Integrated Wetlands              | <p>A programme of delivering integrated wetlands is planned to create several wetlands to aid the reduction of phosphate within the catchment. The delivery of a number of these wetlands will be within the plan period. Any wetland will need to be upstream of the proposal to form potential mitigation.</p>  |
| Revised Nutrient Management Plan | <p>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.</p>   |
| Interim Phosphate Plan Stage 2   | <p>This document provides a range of potential mitigation solutions that could used within the parish. A set of recommendations are included to provide a robust solution to achieve nutrient neutral residential developments. This document has been available on the Councils website since March 2021 and can be found on the link below</p> <p><a href="https://www.herefordshire.gov.uk/downloads/file/22211/interim-phosphate-delivery-plan-stage-2-non-technical-summary">https://www.herefordshire.gov.uk/downloads/file/22211/interim-phosphate-delivery-plan-stage-2-non-technical-summary</a></p>       |
| Other - considerations           | <p>The west side of the parish borders the River Wye.</p> <p>Policy WALF6, seeks to conserve and protect and enhance the landscape, biodiversity and conserve the scenic beauty of the parish, including watercourses. The policy contains nutrient neutrality criteria to ensure development will only be granted where it will not increase the nutrient inputs in the SAC.</p> <p>The some of the proportionate growth requirements within the Core Strategy, have already been met by existing commitments.</p>   |

|                         |  |
|-------------------------|--|
| In-combination policies | <p>The policy does not grant permission or lead to development in itself. It is seeking to comply with the proportional growth requirements of the Core Strategy Policy RA2.</p> <p>The policy criteria within Policy WALF 8 and 9 includes the requirement for suitable sustainable drainage or wet systems. Criteria contained in WALF6 requires all developments to have nutrient neutrality. A planning application will be required and any application will need to meet the requirements of Policy SD4 and Policies WALF 6, WALF8 and WALF9.</p> <p>Policy SD4 required all developments to meet criteria to not undermine the water quality objectives of the SAC.</p> |
|-------------------------|--|

Residual effects – Having taken the above mitigation measures into account, it is considered that there the NDP has appropriate mitigation measures, particularly around water quality. The proportional growth requirements for the parish have been met with commitment and completions, four site allocations and expected windfall. Additional reference to the need for an agreed foul and surface water management strategy with an application would ensure the likely significant effects of the development plan policies have been removed. There are not residual outstanding effects.

Conclusion – The delineation of settlement boundaries and site allocations within the plan does not directly lead to development. All infill sites within the boundary and housing within the 'open countryside' require a planning application. Foul and surface drainage management strategy has been included in policies WALF6, WALF8 and WALF9. Therefore a conclusion of no likely significant effects would result with regards to the Walford NDP Policy.



## Neighbourhood Plan Site Allocation: Arthurs Dingle Leys Hill SR32 (Allocation)

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

Possible Mitigation measures

| Mitigation                       | Description   |
|----------------------------------|---|
| Main sewerage system             | <p>There is no mains drainage within the village of Bishopswood.</p> <p>The areas within the settlement boundaries for Bishopswood site allocations are not covered by the main sewerage area, therefore it is expected for developed to be covered by private treatment facilities.</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 proportional growth requirement is within that expected for the Ross-on-Wye Market area within the Core Strategy and agreed by Welsh Water.</p> <p>Welsh Water have and are continuing to include phosphate stripping in a number of WwTw across the county. This will have a positive impact on the catchment in general.</p> <p>However, the development within the settlement boundaries and site allocations are not connected to WWTW.</p> <p>Specific foul and water management strategy will be needed within all proposals which needs to be agreed upon in writing by the Local Planning Authority.</p> |
| Integrated Wetlands              | <p>A programme of delivering integrated wetlands is planned to create several wetlands to aid the reduction of phosphate within the catchment. The delivery of a number of these wetlands will be within the plan period. Any wetland will need to be upstream of the proposal to form potential mitigation.</p>  |
| Revised Nutrient Management Plan | <p>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.</p>   |
| Interim Phosphate Plan Stage 2   | <p>This document provides a range of potential mitigation solutions that could used within the parish. A set of recommendations are included to provide a robust solution to achieve nutrient neutral residential developments. This document has been available on the Councils website since March 2021 and can be found on the link below</p> <p><a href="https://www.herefordshire.gov.uk/downloads/file/22211/interim-phosphate-delivery-plan-stage-2-non-technical-summary">https://www.herefordshire.gov.uk/downloads/file/22211/interim-phosphate-delivery-plan-stage-2-non-technical-summary</a></p>           |
| Other - considerations           | <p>The west side of the parish borders the River Wye. Policy WALF6, seeks to conserve and protect and enhance the landscape, biodiversity and conserve the scenic beauty of the parish, including watercourses. The policy contains nutrient neutrality criteria to ensure development will only be granted where it will not increase the nutrient inputs in the SAC.</p> <p>The some of the proportionate growth requirements within the Core Strategy, have already been met by existing commitments.</p>  |

|                         |  |
|-------------------------|--|
| In-combination policies | <p>The policy does not grant permission or lead to development in itself. It is seeking to comply with the proportional growth requirements of the Core Strategy Policy RA2.</p> <p>The policy criteria within Policy WALF 8 and 9 includes the requirement for suitable sustainable drainage or wet systems. Criteria contained in WALF6 requires all developments to have nutrient neutrality. A planning application will be required and any application will need to meet the requirements of Policy SD4 and Policies WALF 6, WALF8 and WALF9.</p> <p>Policy SD4 required all developments to meet criteria to not undermine the water quality objectives of the SAC.</p> |
|-------------------------|--|

Residual effects – Having taken the above mitigation measures into account, it is considered that there the NDP has appropriate mitigation measures, particularly around water quality. The proportional growth requirements for the parish have been met with commitment and completions, four site allocations and expected windfall. Additional reference to the need for an agreed foul and surface water management strategy with an application would ensure the likely significant effects of the development plan policies have been removed. There are not residual outstanding effects.

Conclusion – The delineation of settlement boundaries and site allocations within the plan does not directly lead to development. All infill sites within the boundary and housing within the 'open countryside' require a planning application. Foul and surface drainage management strategy has been included in policies WALF6, WALF8 and WALF9. Therefore a conclusion of no likely significant effects would result with regards to the Walford NDP Policy.

## Neighbourhood Plan Site Allocation: Lower Field of Orchard Heights SR34 (Allocation)

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

Possible Mitigation measures

| Mitigation                       | Description   |
|----------------------------------|---|
| Main sewerage system             | <p>There is no mains drainage within the village of Bishopswood.</p> <p>The areas within the settlement boundaries for Bishopswood site allocations are not covered by the main sewerage area, therefore it is expected for developed to be covered by private treatment facilities.</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 proportional growth requirement is within that expected for the Ross-on-Wye Market area within the Core Strategy and agreed by Welsh Water.</p> <p>Welsh Water have and are continuing to include phosphate stripping in a number of WwTw across the county. This will have a positive impact on the catchment in general.</p> <p>However, the development within the settlement boundaries and site allocations are not connected to WWTW.</p> <p>Specific foul and water management strategy will be needed within all proposals which needs to be agreed upon in writing by the Local Planning Authority.</p> |
| Integrated Wetlands              | <p>A programme of delivering integrated wetlands is planned to create several wetlands to aid the reduction of phosphate within the catchment. The delivery of a number of these wetlands will be within the plan period. Any wetland will need to be upstream of the proposal to form potential mitigation.</p>  |
| Revised Nutrient Management Plan | <p>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.</p>   |
| Interim Phosphate Plan Stage 2   | <p>This document provides a range of potential mitigation solutions that could used within the parish. A set of recommendations are included to provide a robust solution to achieve nutrient neutral residential developments. This document has been available on the Councils website since March 2021 and can be found on the link below</p> <p><a href="https://www.herefordshire.gov.uk/downloads/file/22211/interim-phosphate-delivery-plan-stage-2-non-technical-summary">https://www.herefordshire.gov.uk/downloads/file/22211/interim-phosphate-delivery-plan-stage-2-non-technical-summary</a></p>           |
| Other - considerations           | <p>The west side of the parish borders the River Wye</p> <p>Policy WALF6, seeks to conserve and protect and enhance the landscape, biodiversity and conserve the scenic beauty of the parish, including watercourses. The policy contains nutrient neutrality criteria to ensure development will only be granted where it will not increase the nutrient inputs in the SAC.</p> <p>The some of the proportionate growth requirements within the Core Strategy, have already been met by existing commitments.</p>  |

|                         |  |
|-------------------------|--|
| In-combination policies | <p>The policy does not grant permission or lead to development in itself. It is seeking to comply with the proportional growth requirements of the Core Strategy Policy RA2.</p> <p>The policy criteria within Policy WALF 8 and 9 includes the requirement for suitable sustainable drainage or wet systems. Criteria contained in WALF6 requires all developments to have nutrient neutrality. A planning application will be required and any application will need to meet the requirements of Policy SD4 and Policies WALF 6, WALF8 and WALF9.</p> <p>Policy SD4 required all developments to meet criteria to not undermine the water quality objectives of the SAC.</p> |
|-------------------------|--|

Residual effects – Having taken the above mitigation measures into account, it is considered that there the NDP has appropriate mitigation measures, particularly around water quality. The proportional growth requirements for the parish have been met with commitment and completions, four site allocations and expected windfall. Additional reference to the need for an agreed foul and surface water management strategy with an application would ensure the likely significant effects of the development plan policies have been removed. There are no residual outstanding effects.

Conclusion – The delineation of settlement boundaries and site allocations within the plan does not directly lead to development. All infill sites within the boundary and housing within the 'open countryside' require a planning application. Foul and surface drainage management strategy has been included in policies WALF6, WALF8 and WALF9. Therefore a conclusion of no likely significant effects would result with regards to the Walford NDP Policy.

# Appendix 4



Parish Clerk  
Walford Parish Council  
Unitas Villa  
Camp Road  
Ross-on-Wye  
Herefordshire  
HR9 5NJ

**Our ref:** SV/2018/109876/OR-  
56/IS1-L01

**Your ref:**

**Date:** 14 February 2022

**F.A.O: Nick Richmond**

Dear Nick

### **WALFORD REGULATION 14 DRAFT NEIGHBOURHOOD PLAN**

I refer to your email of the 21 December 2021 in relation to the Regulation 14 Walford Neighbourhood Development Plan (NDP). We have also received a separate consultation from Herefordshire Council with the associated Environmental Report and Appropriate Assessment (AA) and I have copied them into this response. I acknowledge the EA Pro Forma you attached with your email.

As part of the adopted Herefordshire Council Core Strategy updates were made to both the Strategic Flood Risk Assessment (SFRA) and Water Cycle Strategy (WCS). This evidence base ensured that the proposed development in Hereford City, and other strategic sites (Market Towns), was viable and achievable. The updated evidence base did not extend to Rural Parishes at the NDP level so it is important that these subsequent plans offer robust confirmation that development is not impacted by flooding and that there is sufficient waste water infrastructure in place to accommodate growth for the duration of the plan period. Herefordshire Council are shortly to begin the Local Plan review process including updates to the evidence base.

**Flood Risk:** We would not, in the absence of specific sites allocated within areas of fluvial flooding, offer a bespoke comment on flood risk at this time. However, it should be noted that the Flood Map provides an indication of 'fluvial' flood risk only. You are advised to discuss matters relating to surface water (pluvial) flooding with the drainage team at Herefordshire Council.

**River Wye SAC Catchment:** It is noted that Walford falls within the Lower Wye catchment area and, although this area is not failing its water quality objectives at

Environment Agency  
Hafren House, Welshpool Road, Shelton, Shropshire, Shrewsbury, SY3 8BB.  
Customer services line: 03708 506 506  
[www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)

Cont/d..

present, an AA has been undertaken in light of recent comments from Natural England (NE). As confirmed within the AA document the most significant issue within the River Wye SAC Catchment (included the River Lugg) relates to water quality and the potential impact of policies and site allocations within the NDP's.

NE are the primary statutory consultation body for AA's and, ultimately, they would need to be satisfied that there is reasonable certainty to take forward the Policies and site allocations in the NDP in discussion with Herefordshire Council. We have previously provided comment on similar NDPs' with a view to ensuring a robust submission and that development can be achieved without impact on the integrity of the SAC, primarily within the Lugg Catchment.

In this instance, as stated above, Walford falls in the Lower Wye Catchment and in an area that is not currently failing its water quality objectives. Therefore we would raise no concerns at this time.

Yours faithfully

**Mr. Graeme Irwin**  
**Planning Specialist**  
Direct dial 02030 251624  
Direct e-mail [graeme.irwin@environment-agency.gov.uk](mailto:graeme.irwin@environment-agency.gov.uk)

Date: 12 May 2022  
Our ref: 379583



Walford Parish Council

**BY EMAIL ONLY**

Customer Services  
Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ

T 0300 060 3900

Dear Sir/Madam,

**Planning consultation:** Walford Neighbourhood Plan – Regulation 14 draft Neighbourhood Plan and draft Environmental Report and Draft Appropriate Assessment.

Thank you for your consultation on the above.

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.

### **European sites – River Wye Special Area of Conservation**

The Walford Neighbourhood Plan allocates housing sites that are within the catchment of the River Wye SAC.

Natural England notes that your authority, as competent authority, has undertaken an Appropriate Assessment of the proposal, in accordance with Regulation 63 of the Conservation of Species and Habitats Regulations 2017 (as amended). Natural England is a statutory consultee on the appropriate assessment stage of the Habitats Regulations Assessment process, and a competent authority should have regard to Natural England's advice.

Your appropriate assessment concludes that your authority is able to ascertain that the proposal will not result in adverse effects on the integrity of any of the sites in question. Having considered the assessment, and the measures proposed to mitigate for all identified adverse effects that could potentially occur as a result of the proposal, Natural England advises that we concur with the assessment conclusions, providing that all mitigation measures are appropriately secured in any planning permission given.

Further general advice on the consideration of protected species and other natural environment issues is provided at Annex A.

Should the proposal change, please consult us again.

Yours faithfully

Rebecca Underdown  
Planning for a Better Environment Team



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

### Natural environment information sources

The [Magic](http://magic.defra.gov.uk/)<sup>1</sup> 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](#)<sup>2</sup>.

**Priority habitats** are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)<sup>3</sup>. 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](#)<sup>4</sup>.

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](http://magic.defra.gov.uk/)<sup>5</sup> website and also from the [LandIS website](http://www.landis.org.uk/)<sup>6</sup>, which contains more information about obtaining soil data.

### Natural environment issues to consider

The [National Planning Policy Framework](#)<sup>7</sup> sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](#)<sup>8</sup> 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.**

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<sup>1</sup> <http://magic.defra.gov.uk/>

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

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

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

<sup>5</sup> <http://magic.defra.gov.uk/>

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

<sup>7</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/807247/NPPF\\_Feb\\_2019\\_revised.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/807247/NPPF_Feb_2019_revised.pdf)

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

## 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.

## Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)<sup>9</sup>), such as Sites of Special Scientific Interest or [Ancient woodland](#)<sup>10</sup>. 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](#)<sup>11</sup>) or protected species. To help you do this, Natural England has produced advice [here](#)<sup>12</sup> 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 171. For more information, see our publication [Agricultural Land Classification: protecting the best and most versatile agricultural land](#)<sup>13</sup>.

## **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.

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

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

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

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

<sup>13</sup> <http://publications.naturalengland.org.uk/publication/35012>

- 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](#)<sup>14</sup>).
- 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).

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<sup>14</sup> <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 5



| Policy          | Modification recommended  | Justification   |
|-----------------|---|---|
| Modification 1  | Reword third sentence of paragraph 3.9 to read "Herefordshire Council has confirmed that between April 2011 and April 2022, 17 dwellings had been built and a further 48 had been granted planning permission". Delete last two sentences of paragraph 3.9. Add new sentence to read " Details are set out on the Table on Page 63" | For clarity and accuracy, providing up to date housing figures.                         |
| Modification 2  | Reword table 2 on Page 63 to read : Table 2 : Achieving the Housing Target 2011-2031  | Update housing figures for clarity and accuracy.  |
| Modification 3  | In Policy WALF1g), add "and support and encourage walking and cycling as the mode of choice."   | Amend in light of HC Active travel comments.  |
| Modification 4  | In first paragraph of Policy WALF2, change "promoted" to "supported"; add "and site allocations" after "infilling". Change "proposed" to "allocated" after "a site is" in second sentence.  | Ensure consistency with other policies of the NDP.                                      |
| Modification 5  | In policy WALF3c), delete "or close" and add "boundary" after "settlement"  | To comply with national guidance. To give more precise guidance for the decision maker. |
| Modification 6  | In last paragraph of Policy WALF6, delete "favourable" in the second sentence. In the third sentence, add "measures "after "mitigation". In the final sentence, add "in making any assessment" after "and associated guidance"  | For clarity and accuracy. Removal of superfluous information.                           |
| Modification 7  | Delete "the significance of" at the start of Policy WALF7. In clause e) delete "the effects of works will fit sensitively into" and replace with "works will sensitively reflect the existing garden design"  | For clarity and accuracy.   |
| Modification 8  | Add "and on the site allocated for development" after "sensitive infilling" in the first sentence of Policy WALF18  | In the interest of clarity and consistency.   |
| Modification 9  | Delete "identified for development "in the second line of Policy WALF20   | For clarity and accuracy.   |
| Modification 10 | In line 2 of Paragraph 7.12 , change "4" to "5". In second sentence add ", Walford and Coughton" after "Bishopswood " and change "16" to "21"   | Update housing figures for clarity and accuracy.  |
| Modification 11 | In fourteenth line of paragraph 7.20, delete "a" and replace with "an informal"   | For clarity and accuracy.   |
| Modification 12 | In second line of Policy WALF 23 add "seasonal" before "workers". Add a new Clause i) to read "All proposals should be accompanied by a full landscape assessment"  | To strengthen policy and align with national and local plan policies.                   |

# Appendix 6

**Appropriate Assessment policy assessment – Walford Neighbourhood Plan**

No policies have been rescreened due to the minor nature of the modifications. The modifications had minor wording changes to clarify and update the policies.