

Appropriate Assessment policy assessment – Woolhope Neighbourhood Plan

Neighbourhood Plan Policy: **WNDP5-** Replacement dwellings in the countryside

Adverse significant effect – foul water, surface water, water quality in the river.

Mitigation	Description
Main sewerage system	The village of Woolhope are served by mains drainage. It is likely that the majority of rural redundant building will be served by private works, however this will be confirmed at the planning application stage.
WWTW	The proportional growth requirement is within the expected for the Ross on Wye housing Market area within the Core Strategy and agreed by Welsh Water. Welsh Water have and are continuing to include phosphate stripping in a number WWTW across the county. This will have a positive impact on the catchment in general.
Integrated Wetlands	A programme of delivering integrated wetland is planned to create a number of wetlands to aid the reduction of phosphate within the catchment. The delivery of a number of these wetlands will be within the plan period. Any wetland will need to be upstream of the proposal to form potential mitigation.
Revised Nutrient Management Plan	A revised Nutrient Management Plan is underway which will contain a variety of measures by partners including the Environment Agency, Welsh Water, Farm Herefordshire and National Farmers Union to reduce phosphate levels within the catchment. This will be finalised within the plan period. This NMP cannot be solely relied upon at this stage.
Interim Phosphate Plan Stage 2	This document provides a range of potential mitigation solutions that could be used within the parish. A set of recommendations are included to provide a robust solution to achieve nutrient neutral residential developments. This document has been available on the Councils website since March 2021 and can be found on the link below https://www.herefordshire.gov.uk/downloads/file/22211/interim-phosphate-delivery-plan-stage-2-non-technical-summary
Other - considerations	Policy WNDP3 River Wye SAC, seeks to conserve the natural environment within the parish including watercourses. It is recommended that criteria should be added to ensure foul and surface water management are considered and demonstrated in a scheme as well as ensuring schemes draining into the Wye catchment and River Lugg sub catchment will be nutrient neutral.
In-combination policies	The policy does not grant permission or lead to development in itself. It is seeking to provide criteria for residential extensions. A planning application will be required and any application will need to meet the requirements of Policy SD4. Policy SD4 required all developments to meet criteria to not undermine the water quality objectives of the SAC. The policy criteria within Policy WNDP3 (River Wye Special area of conservation) include the requirement for acceptable arrangements for the use of suitable sustainable drainage and wet systems and ensure that development going forward will be nutrient neutral.

Possible Mitigation measures

Residual effects – Work is ongoing to secure a number of constructed wetlands across the catchment area. Due to commercial sensitivity, it is not possible to outline the locations of all

these wetlands however, a planning application has recently been granted for the first one in Luston (P21357/F).

It is not possible, or appropriate, at this stage to provide all the details to parish councils to include within their Neighbourhood Development Plans as the technical and scientific work is still progressing. Any specific additions to the reasoned justification or the policy could quickly become dated, then requiring developers or applications to meet solutions or options which were no longer preferred.

It is also not feasible to suggest that every NDP area or site allocation within NDP should have their own wetland solution. The integrated wetlands are a mitigation measure across the catchment area which will provide a solution via a phosphate credit scheme to sites downstream of the wetlands. The Luston wetland is higher up in the catchment than the Woolhope neighbourhood area and includes specific site allocations.

Additional mitigation measures may be appropriate and those options are outlined within the Interim Phosphate Plan. It is not appropriate or possible to prescribe this level of detail to a site allocation at this stage. However, it is recommended for criteria be added to ensure applications clearly and robustly demonstrate that an option for nutrient neutrality is available in order to secure planning permission. This requirement would be the same for a windfall site or other applications as site allocation.

Recent information published by Natural England and Herefordshire Council includes a phosphate calculator and additional guidance regarding nutrient neutrality to assist applicants meet the policy requirements.

Conclusion – The replacement dwellings in the countryside policy included in the plan does not directly lead to development. All proposals within the settlement require a planning application. Policy WNDP3 requires all developments to be nutrient neutral and safeguard the wastewater works from being overloaded. If this was included a conclusion of no likely significant effects would result with regards to the Woolhope NDP Policy WNDP5.

Neighbourhood Plan Policy: WNDP6- Change of use of agricultural buildings to dwellings and holiday use

Adverse significant effect – foul water, surface water, water quality in the river.

Mitigation	Description
Main sewerage system	The village of Woolhope are served by mains drainage. It is likely that the majority of rural redundant building will be served by private works, however this will be confirmed at the planning application stage.
WWTW	The proportional growth requirement is within the expected for the Ross on Wye housing Market area within the Core Strategy and agreed by Welsh Water. Welsh Water have and are continuing to include phosphate stripping in a number WWTW across the county. This will have a positive impact on the catchment in general.
Integrated Wetlands	A programme of delivering integrated wetland is planned to create a number of wetlands to aid the reduction of phosphate within the catchment. The delivery of a number of these wetlands will be within the plan period. Any wetland will need to be upstream of the proposal to form potential mitigation.
Revised Nutrient Management Plan	A revised Nutrient Management Plan is underway which will contain a variety of measures by partners including the Environment Agency, Welsh Water, Farm Herefordshire and National Farmers Union to reduce phosphate levels within the catchment. This will be finalised within the plan period. This NMP cannot be solely relied upon at this stage.
Interim Phosphate Plan Stage 2	This document provides a range of potential mitigation solutions that could be used within the parish. A set of recommendations are included to provide a robust solution to achieve nutrient neutral residential developments. This document has been available on the Councils website since March 2021 and can be found on the link below https://www.herefordshire.gov.uk/downloads/file/22211/interim-phosphate-delivery-plan-stage-2-non-technical-summary
Other - considerations	Policy WNDP3 River Wye SAC, seeks to conserve the natural environment within the parish including watercourses. It is recommended that criteria should be added to ensure foul and surface water management are considered and demonstrated in a scheme as well as ensuring schemes draining into the Wye catchment and River Lugg sub catchment will be nutrient neutral.
In-combination policies	The policy does not grant permission or lead to development in itself. It is seeking to provide criteria for residential extensions. A planning application will be required and any application will need to meet the requirements of Policy SD4. Policy SD4 required all developments to meet criteria to not undermine the water quality objectives of the SAC. The policy criteria within Policy WNDP3 (River Wye Special area of conservation) includes the requirement for acceptable arrangements for the use of suitable sustainable drainage and wet systems and ensures that development going forward will be nutrient neutral.

Possible Mitigation measures

Residual effects – Work is ongoing to secure a number of constructed wetlands across the catchment area. Due to commercial sensitivity, it is not possible to outline the locations of all these wetlands however, a planning application has recently been granted for the first one in Luston (P21357/F).

It is not possible, or appropriate, at this stage to provide all the details to parish councils to include within their Neighbourhood Development Plans as the technical and scientific work is still progressing. Any specific additions to the reasoned justification or the policy could quickly become dated, then requiring developers or applications to meet solutions or options which were no longer preferred.

It is also not feasible to suggest that every NDP area or site allocation within NDP should have their own wetland solution. The integrated wetlands are a mitigation measure across the catchment area which will provide a solution via a phosphate credit scheme to sites downstream of the wetlands. The Luston wetland is higher up in the catchment than the Woolhope neighbourhood area and includes specific site allocations.

Additional mitigation measures may be appropriate and those options are outlined within the Interim Phosphate Plan. It is not appropriate or possible to prescribe this level of detail to a site allocation at this stage. However, it is recommended for criteria to be added to ensure applications clearly and robustly demonstrate that an option for nutrient neutrality is available in order to secure planning permission. This requirement would be the same for a windfall site or other applications as site allocation.

Recent information published by Natural England and Herefordshire Council include a phosphate calculator and additional guidance regarding nutrient neutrality to assist applicants meet the policy requirements.

Conclusion – The change of use of agricultural buildings to dwellings and holiday use policy included in the plan does not directly lead to development. All proposals within the settlement require a planning application. Policy WNDP3 requires all developments to be nutrient neutral and safeguarding the wastewater works from being overloaded. If this was included a conclusion of no likely significant effects would result with regards to the Woolhope NDP Policy WNDP6.