



The Conservation of Habitats and Species Regulations (2017) Part 6, section 63

‘Assessment of implications for European sites and European offshore marine sites’

Habitats Regulation Assessment

This is a record of the Habitat Regulations Assessment (HRA) (including Screening for Likely Significant Effects and Appropriate Assessment where required) carried out by Herefordshire Council (the competent authority) as required by Regulation 63 of the Conservation of Habitats & Species Regulations 2017 (the ‘Habitats Regulations’) relating to the following **planning application**.

This HRA is carried out in accordance with the relevant guidance documents including those by Natural England at <https://www.gov.uk/guidance/appropriate-assessment>, and David Tyldesley Associates <https://www.dtapublications.co.uk/>

The HRA is carried out by Herefordshire Council. Detailed information will need to be provided by the applicant to enable the authority to make the assessment.

The Project / Plan

1.1 Planning Application Reference Number, Description and Address

Application reference number: 222138

Address: Land at Three Elms, North East Quarter, To the north east of Huntington and bounded, by Three Elms Road and Roman Road, Hereford, Herefordshire, HR4 7RA

Description: PENDING S106 AGREEMENT - Outline Planning application with all matters reserved, except access, for the first phase of an urban extension comprising up to 350 homes (Use Class C3); and a care home (Use Class C2), park & choose interchange; together with open and play space, landscaping, infrastructure and associated works.

Applicant: The Church Commissioners for England

Case officer: Ms Heather Carlisle

Location OSGR: 348711, 241899

Link to Planning Application on Herefordshire Council Website:
https://www.herefordshire.gov.uk/info/200142/planning_services/planning_application_search/details?id=222138&search-term=three%20elms

1.2 Description of the plan or project (details)

Outline Planning application with all matters reserved, except access, for the first phase of an urban extension comprising up to 350 homes (Use Class C3); and a care home (Use Class C2), park & choose interchange; together with open and play space, landscaping, infrastructure and associated works.

1.3 Documents and plans considered – *delete/ add as appropriate*

Herefordshire Local Plan Core Strategy 2011 – 2031

River Wye SAC Nutrient Management Plan

National Planning Policy Framework

The Conservation of Habitats and Species Regulations 2017 (as amended)

1.4 Planning Policy context:

Outline

1.5 Size (ha) and description (habitats etc.) of existing site

24.8 of agricultural land with hedgerows and connections to the SWS Pond at Huntington Court and bordering the SINC Yazor Brook.

1.6 Surrounding land use and context in relation to designated sites

Agricultural-Residential, 2.5 km from River Wye SSSI, land between proposed site and River Wye SSSI residential and industrial in nature, the proposed site borders the Yazor Brook a direct tributary of the river Wye.

Relevant Habitats (Natura 2000) site(s)

- ☒ River Wye Catchment SAC (including schemes impacting on the linked River Lugg SSSI)
- ☐ River Clun SAC
- ☐ Wye Valley Woodlands SAC
- ☐ Downton Gorge SAC
- ☐ Wye Valley & Forest of Dean Bat Sites SAC (Wigpool Iron Mines SSSI)
- ☐ Other site (SAC, Ramsar)

Details of the Site:

1. River Wye SAC

The River Wye SAC covers an area of 2234.89 ha in Gloucestershire, Herefordshire, Monmouthshire and Powys.

Designated features

Qualifying habitats

The site is designated under article 4(4) of the Directive (92/43/EEC) as it hosts the following habitats listed in Annex I:

- Transition mires and quaking bogs. (Very wet mires often identified by an unstable 'quaking' surface).
- Water courses of plain to montane levels with the *Ranunculus fluitans* and *Callitriche Batrachion* vegetation. (Rivers with floating vegetation often dominated by water crowfoot)

Qualifying species

The site is designated under article 4(4) of the Directive (92/43/EEC) as it hosts the following species listed in Annex II:

- Allis shad *Alosa alosa*
- Atlantic salmon *Salmo salar*
- Brook lamprey *Lampetra planeri*
- Bullhead *Cottus gobio*
- Otter *Lutra lutra*
- River lamprey *Lampetra fluviatilis*
- Sea lamprey *Petromyzon marinus*
- Twaite shad *Alosa fallax*
- White-clawed (or Atlantic stream) crayfish *Austropotamobius pallipes*

Conservation Objectives of the Designated features:

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of qualifying natural habitats and habitats of qualifying species
- The structure and function (including typical species) of qualifying natural habitats
- The structure and function of the habitats of qualifying species

- The supporting processes on which qualifying natural habitats and habitats of qualifying species rely
- The populations of qualifying species, and,
- The distribution of qualifying species within the site.

[European Site Conservation Objectives for River Wye SAC - UK0012642 \(naturalengland.org.uk\)](https://naturalengland.org.uk)

Site Condition

Site condition, for the area of the site in England, is taken from the constituent SSSI units for the River Wye SSSI and the River Lugg SSSI.

River Wye SSSI

Unit	Unit name	Condition	Condition Threat Risk	Habitat	Area (ha)	GridRef
001	TIDAL RIVER - ESTUARY TO BROCKWEIR BRIDGE	Unfavourable - Declining	High	RIVERS AND STREAMS	114.9234 ha	ST 537 956
002	BROCKWEIR BRIDGE TO MONMOUTH	Unfavourable - Declining	High	RIVERS AND STREAMS	36.3835 ha	SO 534 055
003	MONMOUTH TO ROSS	Unfavourable - Declining	High	RIVERS AND STREAMS	157.0946 ha	SO 573 185
004	ROSS TO HEREFORD	Unfavourable - Declining	High	RIVERS AND STREAMS	293.5648 ha	SO 568 320
005	HEREFORD TO BREDWARDINE BRIDGE	Unfavourable - Declining	High	RIVERS AND STREAMS	150.1955 ha	SO 418 415
006	BREDWARDINE BRIDGE TO WHITNEY TOLL	Unfavourable - Declining	High	RIVERS AND STREAMS	122.4429 ha	SO 300 461
007	WHITNEY TOLL TO HAY	Unfavourable - Declining	High	RIVERS AND STREAMS	30.8778 ha	SO 242 458

River Lugg SSSI

Unit	Unit name	Condition	Condition Threat Risk	Habitat	Area (ha)	GridRef
001	RIVER LUGG (WYE SAC)	Unfavourable - Declining	High	RIVERS AND STREAMS	58.8726 ha	SO 530 455
002	BODENHAM WEIR TO LEOMINSTER	Unfavourable - Declining	High	RIVERS AND STREAMS	20.4404 ha	SO 503 573
003	LEOMINSTER TO MORTIMERS CROSS	Unfavourable - Declining	High	RIVERS AND STREAMS	36.2719 ha	SO 448 623
004	MORTIMERS CROSS TO PRESTEIGNE	Unfavourable - Declining	High	RIVERS AND STREAMS	26.8469 ha	SO 366 648

Other Relevant Documents

There is a Site Improvement Plan for the River Wye which can be found at [Site Improvement Plan: River Wye - SIP199 \(naturalengland.org.uk\)](https://naturalengland.org.uk)

Stage1: Preliminary Screening including Likely Significant Effects (LSE)

Completed by:

A. Coxixio

Date: 02/10/2024

Table 1: Initial Screening

Does the project or plan qualify for exemption from the HRA process?

Is the project or plan directly connected with or necessary for the conservation management of the habitat site (provide details)?
If so the project may be considered exempt from the HRA process.

No

If the proposal is considered exempt from the HRA process? Has this been consulted upon and agreed with Natural England?	NA/Not exempt
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Table 2: Screening for Likely Significant Effects (LSE)

Key issues considered:

<input checked="" type="checkbox"/> Foul water	<input checked="" type="checkbox"/> Water pollution
<input checked="" type="checkbox"/> Surface water	<input type="checkbox"/> Water abstraction
<input type="checkbox"/> Aerial Emissions (ammonia, N deposition & acid deposition)	<input checked="" type="checkbox"/> Recreational impacts
<input checked="" type="checkbox"/> Construction or Demolition processes	<input checked="" type="checkbox"/> Protected species impacts (direct)
<input type="checkbox"/> Direct impacts inside SAC boundary (habitats)	<input checked="" type="checkbox"/> Protected species impacts (indirect)
<input type="checkbox"/> Impacts upon supporting habitats	<input type="checkbox"/> Other

Details of key issues & identification of potential effect pathways

The proposal relates to a development of up to 350 dwellings which will discharge via a mains connection to Hereford Eign Waste Water Treatment Works. Surface water from the site is to be attenuated to greenfield rate plus an allowance for climate change and discharged to the Yazor Brook.

The potential effect pathways by which the development might impact upon the River Wye SAC and River Wye SSSI have been identified above. The proposal has the potential for a likely significant effect on the River Wye SAC based on increased recreational pressure impacting annex species and the increased discharge of surface water to the Yazor Brook impacting flows and nutrients.

This HRA should be read alongside supporting information available in the Herefordshire Council Planning Portal following the application reference link provided on the first page of this document:

- sHRA: An Update 2024 by EDP dated August 2024
- Three Elms North East Quarter, Hereford –Further Information Environmental Statement Technical Note by Waterman June 2024
- Outline Protected Species Mitigation Strategy by EDP
- EDP Ecological Baseline Report dated June
- Updated Flood Risk Assessment by Tetra Tech

Schemes in the Middle or Lower Wye which connect foul flows to Waste Water Treatment Works via a mains connection with no surface water to mains sewer

Mains developments which connect to mains Waste Water Treatment Works discharging to the Middle and Lower Wye which are outside of the Lugg Nutrient Neutral Catchment are considered below.

This development is for 350 dwellings and will connect to Hereford Eign Waste Water Treatment Works, this has been confirmed by DCWW on 29 September 2023.

Evidence from the Habitats Regulations Assessment Report – Pre-submission Publication of the Herefordshire Local Plan – Core Strategy by LUC (September 2014) is relied upon here with quotations coming from that document. Most recent data from September 2022 relating to housing completions and commitments is taken from the Annual Monitoring Report 2022¹.

In 2013 Herefordshire Council and Welsh Water reviewed the existing headroom and capacity across all Waste Water Treatment Works in the County and compared that to levels of development proposed within the Core Strategy. This review included capacity at mains WWTW only and does not include developments relying on non mains drainage solutions.

¹ Herefordshire Council Annual Monitoring Report. Appendix A – Housing Completions and Commitments [Appendix A Housing Completions And Commitments Data \(herefordshire.gov.uk\)](#)

The Core Strategy HRA concluded that 'there is sufficient permitted headroom in the STW serving Hereford, Bromyard, Kington and Ross on Wye to continue to treat water from the amount of new housing provided for in the Core Strategy throughout the Plan period, although under the current water quality levels in the River Wye SAC this does not mean that there would not be a likely significant effect on water quality if all the available headroom were used.'

The document set out a comparison between the existing headroom and the proposed housing levels within the Core Strategy relating to each of the Waste Water Treatment Works. It should be noted that this approach does not apply to areas around Leominster in the Lugg Catchment where Nutrient Neutrality applies.

STW	Headroom	Proposed Housing
Hereford Eign	7595	6500
Rotherwas Hereford	11525	
Bromyard	526	500
Kington	597	200
Lower Cleve (Ross on Wye)	1403	900
Leominster (Worcester Road Leominster) *	922	2300
Various STW (rural parts of Herefordshire) *	2513	5300
	Total	15,700

*There WWTW (Leominster and the rural STW) are covered entirely (Leominster) or partially (some of the rural STW) by Natural England's Nutrient Neutrality approach and are not discussed further here.

The Council keeps a running log of developments given planning permission (commitments) and delivered (completions) as part of its Annual Monitoring Report. This monitoring mechanism allows the Council to ensure that assessed headroom is not exceeded, or indeed entirely utilised.

The current monitoring figures are dated April 2022 and are summarised below.

Commitments:

Area	Net housing commitments
Hereford	845
Leominster	420
Ross-on-Wye	591
Ledbury	931
Bromyard	106
Kington	21
Rural	2396
Total:	5310

Housing completions:

2011 – 2022 there is a requirement for net housing completions of 8150.

2011 – 2022 has delivered net completions of 6382. Delivery has been slower than predicted at the start of the plan period with only one of the three identified Sustainable Urban Extensions having so far gained planning permission.

Completions plus commitments (at April 2022) = 11,692

This is still some distance short of the 15,700 homes identified as being necessary between 2011 – 2025 (the Plan Period).

It is clear that there is still sufficient headroom remaining within the housing numbers assessed in the

HRA of the Core Strategy for further development in line without the likelihood of impacts upon water quality in the River Wye.

It should be noted that since the time of the LUC document (September 2014) the River Wye has been downgraded by Natural England to Unfavourable Declining. The site is not, however, considered to be failing and Natural England have not advised Herefordshire Council that any additional measures or change in approach is required at this time.

Additionally, it should be noted that the current program of upgrades to WWTW by Welsh Water includes improved phosphate removal and associated reduced permitting levels for some WWTW across the Middle and Lower Wye:

SWT	Sub-catchment	Current P Permit Level (mg/p/l)	P Permit by 2025 (mg/p/l)
Hereford Eign	Upper Wye	1	0.4
Rotherwas Hereford	Upper Wye	1	0.4
Bromyard	Lugg	1	1
Moreton	Lugg	1	1
Kington	Lugg	1	1
Weobley STW	Lugg	5	1.5
Kingstone & Madeley	Upper Wye	5	2
Leominster	Lugg	1	0.5
Pontrilas	Lower Wye	5	1.8
Lower Cleve	Lower Wye	2	2

On this basis, and relying on the HRA of the Core Strategy (LUC, 2014) developments in the Middle and Lower Wye which are within the existing headroom for WWTW at Hereford (Eign and Rotherwas), Kingstone & Madeley, Pontrillas and Lower Cleve are screened out from requiring further assessment and are considered not to constitute a likely significant effect upon the River Wye SAC and an Appropriate Assessment is not required.

Please Note: Developments feeding to Eign WWTW which sit north and east of the River Lugg (Lugwardine and surrounding areas) cannot be screened out. There is a capacity issue in the sewer passing under the River Lugg which triggers a Combined Sewer Overflow at New Court directly into the River Lugg SSSI. While there is capacity for these dwelling at Eign WWTW itself planning appeals have confirmed this potential effect pathway and therefore developments in Lugwardine and surrounding villages will require an Appropriate Assessment.

Are there any potential effects of the project or plan when considered alone?	YES
Are there any potential effects of the project or plan <u>in combination</u> with other projects or plans?	YES Any development within the Wye Catchment has potential for 'in combination effects'

Natural England consultation reference and summary (if available):

486935

Summary of LSE test conclusions

☒ Likely significant effects – Appropriate Assessment required.

Stage 2: Appropriate Assessment

Completed by:

A. Coxixio

Date: 04/10/2024

Table 3: Impacts of the plan/ project alone

Surface Water

Information on proposed surface water drainage is found within the Updated Flood Risk Assessment by Tetra Tech and in ongoing correspondence between the applicant and the Internal Drainage Consultee which can be found on the casefile. The Council's Drainage Consultant has agreed the technical elements of the drainage strategy but is still clarifying some elements of detail.

There have been ongoing discussions with the Environment Agency as the proposed site is considered highly sensitive with regards to ground water and surface water, with parts of the site falling within Source Protection Zones (1, 2, and 3). This has also been addressed by the councils drainage consultee and additional technical information to demonstrate compliance with all regulatory functions of the Environment Agency are additional to any ecological constraints and HRA process.

The initial Tetra Tech FRA Drainage Strategy dated June 2022 offered a greenfield rate of 1.69 l/s/HA, this has since been changed to 2.15 l/s/ha, this was confirmed on 4.24 (page 27) of the sHRA: An Update 2024 by EDP dated August 2024, and the Councils Drainage consultee has requested that the current outlined greenfield runoff rates will need to be corrected at Reserved Matters stage.

Attenuation features have been designed to have capacity for 1 in 100 year floods, in addition to a 45% allowance for climate change.

Based on the current proposal some of the attenuation features for this development site are within areas of being at risk of fluvial flooding, a detailed plan for the site will be provided at Reserved Matters Stage. The provision of new grass, shrub, and woodland open green space for residential and protected species use (11.59 ha), in addition to the cessation of agricultural use of the land will further offset impacts associated with surface water run-off.

Surface water comes from roofs and roadways/parking areas and is assessed as having very low (roofs) and low (everything else) pollution prevention. The swales/attenuation basins are set out as being sufficient to address pollution arising from suspended solids, metals and hydrocarbons but it is anticipated that a range of other measures will be included in the details at reserved matters which will further reduce potential pollution bringing the quality of water discharged from the site to above adequate.

Surface water is not considered likely to have an adverse effect on the integrity of the River Wye SAC either alone or in-combination and sufficient measures are embedded in the proposal to ensure sufficient water quality within the need for additional mitigation.

Construction or Demolition processes/Water pollution

In general across the site there is the possibility of polluting substances and sedimentation from construction if not controlled to discharge to the Yazor Brook.

Based on surface water plans provided in the Tetra Tech Updated Flood Risk Assessment, swales discharging to the Yazor Brook and headwalls/outfalls will be clarified at Reserved Matters stage. The construction of new outfalls could impact habitats and species associated with the River Wye SAC that it is hydrologically connected to. There is also potential for pollution events during construction and use of equipment and cement products within the brooks channel/banks. There are also potential biosecurity measures required to ensure machinery and operatives do not transfer any biological pathogens.

This can will be mitigated through a general site best practice pollution prevention measures and management, implemented via general Construction Environmental Management Plan (CEMP) – to consider all potential environmental and ecological impacts and secure appropriate mitigation and risk reduction measures for all site preparation and construction processes. The general site CEMP will be secured through condition.

A specific section of the Construction Environmental Management Plan will be conditioned for all works in and around the Yazor Brook and consideration and proposed mitigation measures in respect of the additional environmental and ecological effects these specific works create. This 'aquatic' CEMP can be secured by condition on any planning permission granted.

Recreational impacts/Species impact

There is confirmed otter presence in association with the Yazor Brook based on surveys provided by the applicant and the Yazor Brook is considered optimal habitat for otters as it provides suitable cover, foraging, and commuting opportunities. There is the potential for construction effects on otters. All works should follow a Reasonable Avoidance Method Statement and otters must be included as a specific consideration within the Construction Environmental Management Plan for the proposed new surface water discharge and headwall construction into the brook.

The proposed development would lead to a large increase of recreational pressure and direct impact on otters from walkers and dogs, or commuting. There is an existing Public Right of Way from the North of the proposed site that offers direct access through the Yazor Brook, creating a direct link to wider infrastructure to Hereford City centre, local schools (Trinity Primary School and Whitecross High School), and a commercial estate. Although no new brook crossings are recommended as part of the plans, a new footpath running parallel to the Yazor Brook has been suggested, which connects residential development with the far south eastern corner of the Application Site.

The applicants ecologist has confirmed:

- “The proposed retention of the Yazor Brook and associated riparian habitats with implementation of a buffer between the watercourse and built development measuring between 20m and 200m.”
- Enhancement of riparian habitats
- Reasonable avoidance measures and pre-commencement checks of all habitats 10 m from the Yazor Brook
- No new Yazor Brook crossing
- A detailed sensitive lighting scheme

This has been conditioned as part of wider ecology conditions and we have requested a site wide combined Ecological Mitigation Strategy, which addresses ecological protection, mitigation, compensation, enhancement, and management to be submitted at Reserved Matters.

The EDP updated sHRA screens out recreational impacts based on the inclusion of 11.59 ha of open green space for residents. We have also included a condition to manage and control recreational use of footpaths and open space to ensure no disturbance effects on the core linear wildlife feature (Yazor Brook wildlife corridor) are submitted for approval prior to any works commencing on site.

Protected species impacts

The Yazor Brook supports annex species as confirmed by the Shadow HRA and also in the Ecological Assessment by EDP.

(see above Recreational Impacts on protected species)

Protected Species conditions have been included as part of wider ecological considerations.

The EDP Ecological Baseline Report dated June 2022 references the Water Framework Directive compliance assessment carried out by Ahern Ecology in 2014 where white clawed crayfish were presumed absence, no further survey has been done in regards to this species. The Yazor Brook may be of importance for commuting of Crayfish species that are protected species and a feature of the SAC designation. The general CEMP, in particular the additional dedicated ‘aquatic’ CEMP element to cover works in and around Yazor Brook will ensure that any potential adverse effects on the habitats or species associated with the SAC designation, other protected species and general ecological interests are considered and appropriate mitigation measures implemented.

Recommended planning conditions to secure mitigation which is required in order to achieve no effect on integrity of the Designated Site.

1) Habitat Regulations (River Wye SAC) – Foul Water

All foul water shall discharge to a mains sewer connection; unless otherwise agreed in writing by the

Local Planning Authority.

Reason: In order to comply with Conservation of Habitats and Species Regulations 2017, as amended by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019' (the 'Habitats Regulations'), Wildlife & Countryside Act (1981 amended) National Planning Policy Framework, NERC Act (2006) and Herefordshire Local Plan - Core Strategy policies SS1, SS6, SD3, SD4 and LD2.

2) Habitat Regulations (River Wye SAC) – surface water management

As detailed in the Updated Flood Risk Assessment by Tetra Tech all additional surface water shall be managed by swales with an attenuated direct discharge to the Yazor Brook; unless otherwise agreed in writing by the Local Planning Authority.

Reason: In order to comply with Conservation of Habitats and Species Regulations 2017, as amended by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019' (the 'Habitats Regulations'), Wildlife & Countryside Act (1981 amended) National Planning Policy Framework, NERC Act (2006) and Herefordshire Local Plan - Core Strategy policies SS1, SS6, SD3, SD4 and LD2

3) Habitat Regulations (River Wye SAC) – General Construction Environmental Management Plan

For each agreed phase of development, prior to any works or site preparation commencing on a detailed Construction Environmental Management Plan – including ecological working method statement based on the assessment and details of the person responsible for the implementation of the CEMP, shall be supplied to the LPA for written approval. The approved CEMP shall be implemented in full for the duration of all construction works at the site unless otherwise approved in writing by the local planning authority.

Reason: To ensure that all species are protected and habitats enhanced having regard to the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019' (the 'Habitats Regulations'), Wildlife and Countryside Act 1981, National Planning Policy Framework (2021), NERC Act (2006) and Herefordshire Local Plan - Core Strategy policies SS1, SS6, LD1, LD2 and LD3 and the council's declared Climate Change & Ecological Emergency.

4) Habitat Regulations (River Wye SAC) - Construction Environmental Management Plan (Yazor Brook/Watercourse)

No development and/or site preparation works shall commence to install any headwall and other works within or directly adjacent to the Yazor Brook until a detailed, comprehensive, Construction

Environmental Management Plan – including but not limited to detailed ecological working methods and consideration of all environmental effects, including biosecurity and direct water quality protection measures for all operations shall be supplied to the LPA for written approval. The approved CEMP shall be implemented in full for the duration of all construction works associated with Yazor Brook unless otherwise approved in writing by the local planning authority.

Reason: To ensure that all species are protected and habitats enhanced having regard to the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019' (the 'Habitats Regulations'), Wildlife and Countryside Act 1981,), National Planning Policy Framework (2021), NERC Act (2006) and Herefordshire Local Plan - Core Strategy policies SS1, SS6, LD1, LD2 and LD3 and the council's declared Climate Change & Ecological Emergency.

5) Habitat Regulations (River Wye SAC) – PROW (Yazor Brook)

Prior to any development commencing, a detailed plan and specifications, including use of natural planting and features, artificial fencing & similar and public awareness with interpretation-signage, to manage and control recreational use of footpaths and open space to ensure no disturbance effects on the core linear wildlife feature (Yazor Brook wildlife corridor) shall be supplied to the LPA for written approval. The approved plan shall be implemented in full unless otherwise approved in writing by the local planning authority.

Reason: *To ensure that all species are protected and habitats enhanced having regard to the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019' (the 'Habitats Regulations'), Wildlife and Countryside Act 1981,), National Planning Policy Framework (2021), NERC Act (2006) and Herefordshire Local Plan - Core Strategy policies SS1, SS6, LD1, LD2 and LD3 and the council's declared Climate Change & Ecological Emergency.*

Table 5: Remaining Impacts

None

Table 6: Consequences for Conservation Objectives of the Designated Site

Impacts on maintaining the favourable condition of the site	No
Disruptions or delays in progress towards achieving the conservation objectives of the site	No
Alterations to natural progression or other natural changes within the site	No
Loss of key habitat/ species features. Fragmentation or isolation of key species and habitats. Impacts to diversity, distribution, density, balance, area or population(s) of key species or habitats that are indicators of the favourable condition of the site, including from disturbance	No

Alterations to the ecological relationships and balance between species and habitats that are key to the structure/ function of the site	No
Alterations to nutrient balance or other processes vital to the functioning of the ecosystem	No

Table 7: Integrity Test

Will there be an impact upon the Integrity of the Designated Site?

No

Conclusion of the Appropriate Assessment:

☒ Herefordshire Council, as a Competent Authority under the Habitat Regulations 2017, Part 6, section 63(5) concludes that **there would be NO** adverse effects on the integrity of the Special Area of Conservation; subject to appropriate mitigation being secured via the planning conditions listed above. Planning Permission can legally be granted.

Please Note: The authority must consult Natural England on the draft HRA and must have regard to the advice of Natural England before granting planning permission.