

Memorandum of Understanding
River Avon Special Area of Conservation
Phosphate Neutral Development - Interim Mitigation

Introduction

1. This Memorandum of Understanding (MoU) is made between the following parties:
 - Environment Agency (EA) Wessex Area
 - Natural England (NE)
 - New Forest District Council (NFDC)
 - New Forest National Park Authority
 - Wessex Water Services Ltd (WW)
 - Wiltshire Council (WC)

2. It describes how each local planning authority will ensure that development is ‘phosphate neutral’, as defined by this MoU, and therefore will not have adverse effects upon the integrity of the River Avon Special Area of Conservation (SAC), an internationally important wildlife site.

3. The need for this MoU follows a joint statement from the Environment Agency and Natural England that said:

“Evidence suggests that the targets in the Hampshire Avon nutrient management plan are unlikely to be delivered by 2021. We are modelling what this means for the Nutrient Management Plan, and will be providing recommendations in March 2019.

We know that there will be new development and we advise that the new development within the catchment of the Hampshire Avon needs to be “phosphate neutral”. We will work with you to help you demonstrate how that can be best achieved.” (Email from EA to WC, NFDC and East Dorset/Christchurch Council, 9th March 2018)

4. This MoU describes how development may be ‘phosphate neutral’. This operational definition applies when determining planning applications and to development proposed in local plans. Phosphate neutral development is unlikely to have a significant effect, either alone or in-combination, on the River Avon SAC in relation to the site’s conservation objective for nutrients.

5. The MoU also describes where the parties will work together to help develop and implement appropriate phosphate controls and mitigation measures.

Principles and definitions

<i>Phosphate neutral</i>	The additional phosphorus load generated by new development after controls at source, reduction by treatment and/or offsetting measures leads to no net increase in the total phosphorus load discharged to the River Avon SAC.
<i>Additional Phosphate load</i>	<p>The additional phosphorus load that arises from an increase in population created by new residential development before controls at source, reduction by treatment (other than the reduction already required by existing permits) and/or offsetting measures, i.e. the load that needs to be negated to achieve phosphate neutral.</p> <p>The load will be estimated using the higher water efficiency requirements of the Building Regulations where it has been secured</p>

	<p>for the relevant development¹.</p> <p>The load from sewered development entering the river is already controlled at many sewage treatment works, and all larger works, by environmental permits that restrict the maximum concentration of total phosphorus discharged in effluent and is measured in µg/litre or mg/litre.</p> <p>Each sewage treatment works reduces the phosphorous load through stripping techniques. Sewage treatment works generally operate at or below 90% of their permitted level in order to ensure the permit is not breached during unusual conditions. Assessment is therefore based on 90% of treatment works permit capacity as a 'worst case' scenario.</p>
<i>Interim Phosphate Mitigation measures</i>	<p>A range of measures that can be deployed to reduce the phosphate load before a permanent solution is secured. These measures will be published in an Annex of the Nutrient Management Plan (NMP). Examples of these measures are listed in Appendix 4 to this MoU.</p>
<i>Interim Phosphate Mitigation period</i>	<p>9 March 2018 to 31 March 2025 at the latest, being the period from the date of issue of the joint NE and EA statement, to the end of the financial year and prior to the start of the next Water Industry Asset Management Plan (AMP) 2025-2030.</p> <p>After this date the interim phosphate mitigation measures should be replaced by the measures secured through the next Price Review (PR24) process and implemented under the AMP and/or additional measures. Beyond this time an approach will take account of water company planning, as well as Government policy and legislation. The period may also end sooner as a result of new evidence, early start on additional measures before PR24 or an alternative approach (such as measures secured through a revised NMP for the catchment).</p> <p>After this date also, Local Plans will review development proposals for the catchment taking account of the outcomes from the Price Review and any additional measures.</p>

6. In principle, each local planning authority will estimate the additional phosphate load for residential development². The parties will then identify interim mitigation measures that offset that load. Both individual planning applications and proposals for residential development in local plans will therefore be 'phosphate neutral'³.

Qualifying development

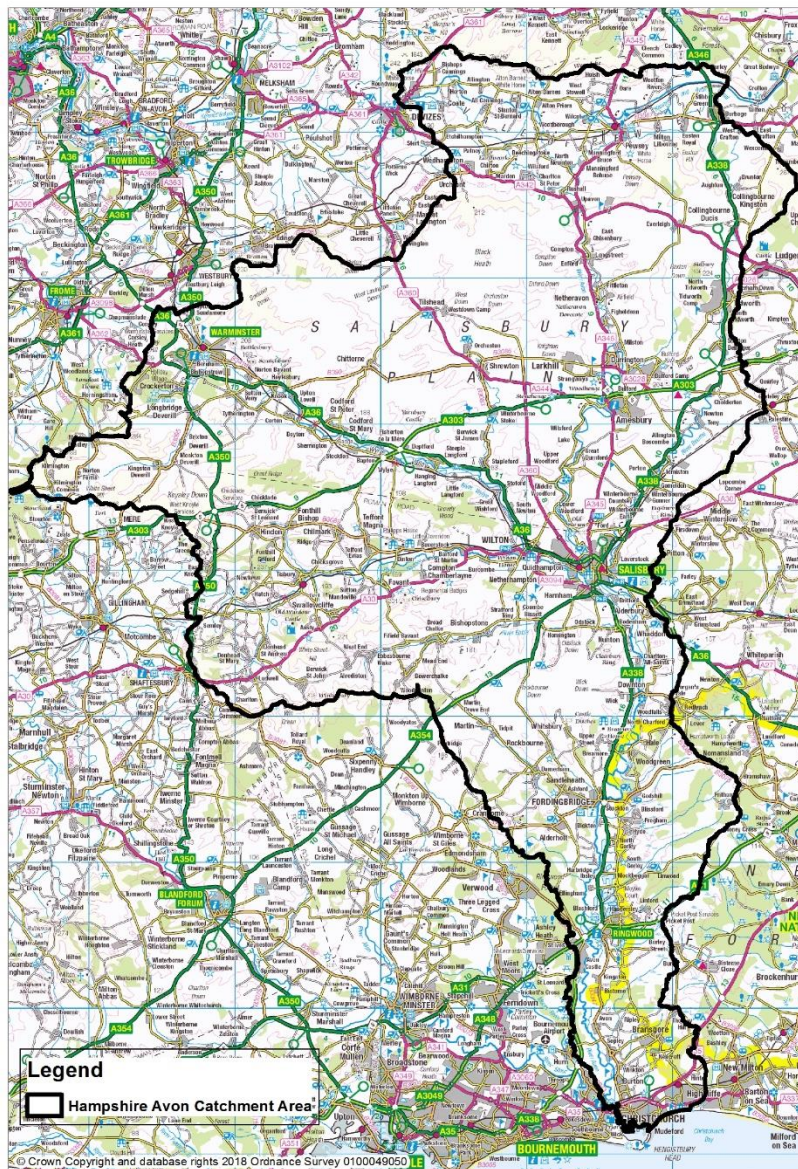
7. The approach of phosphate neutral development applies to authorisations given after 9 March 2018 and that result in a net increase in dwellings within the River Avon

¹ Building Regulations 2010, Part G, Sanitations, Hot Water Safety and Water Efficiency

² Use Class C3 of the Use Classes Order 1987 (as amended)

³ Non-residential development will be considered on a case by case basis.

catchment. The approach applies to local plans with a plan area that involves land within the catchment area. The catchment area is shown below:



Memorandum of Understanding

8. In the light of the joint interim statement from Natural England and the Environment Agency, the signatory local planning authorities commit to following a precautionary approach, and to each putting in place effective and proportionate measures to remove, mitigate or offset the phosphate load from qualifying developments within their planning jurisdictions.
9. These measures apply to both planning decisions and plan-making and operate within the legal and policy framework of the planning system, such as governing the use of planning conditions, Community Infrastructure Levy and s106 obligations. Measures in Local Plan policies or supporting documents, may result from the Appropriate Assessment of emerging Local Plans.

10. Each local planning authority already has its own approach to safeguarding the integrity of the River Avon SAC. Differences in approach, to some extent, correspond to the scales of development each authority must manage.
11. Each signatory planning authority, as a Competent Authority under the Habitats Regulations, will decide the appropriate approach to apply within their planning jurisdiction in consultation with Wessex Water, Natural England and the Environment Agency. There are therefore separate appendices to the MoU outlining each authority's approach.
12. All signatories commit to working cooperatively to set out and cost appropriate phosphate mitigation or offsetting measures. The signatories agree to work together to develop the means for their delivery. More detailed measures will be set out in an appropriate form and published, for example in an update to the NMP.

Calculation of Phosphate Loading

13. For each qualifying planning application or Local Plan development allocation, the relevant local planning authority can estimate the additional phosphate load for the development within the Interim Phosphate Mitigation Period.
14. Phosphate loads are estimated on a rate of phosphate produced per dwelling assuming an average occupancy of 2.3 people per dwelling, unless there is clear evidence that a higher or lower number is appropriate for the type of residential development proposed.
15. The phosphate load is calculated on the basis that residential development will be built to the highest water efficiency standards provided for by the building regulations. Each local planning authority will impose a planning condition on all planning permissions⁴ for one or more net additional new dwellings requiring construction to the optional requirement⁵ under G2 of the Building Regulations 2010. NE and EA have provided evidence to justify this imposition. A model condition has been agreed between the parties as below:

“The dwellings shall not be occupied until the Building Regulations Optional requirement of a maximum water use of 110 litres per day has been complied with.”
16. Phosphate load will be estimated in line with the environmental permit of the relevant connected sewage treatment works. Calculation will use a worst-case scenario that a treatment works operates at 90% of its permitted level.
17. Assuming 2 years from submission of an application to occupation, the total phosphate load will be calculated for the five-year period 2020 to 2025, the end of the interim phosphate mitigation period.
18. A worked example is as below:

⁴ To include the consenting regime that will apply to applications for Permission in Principle where applicable.

⁵ The optional requirement referred to in G2 requires installation and fittings and fixed appliances for the consumption of water at 110 litres per person per day.

Estimating the Additional Total Phosphorus (TP) Load of a development proposal				
Discharge per day	Planning application	1000	dwellings	
	Additional population	2300	persons	Uses an average household size of 2.3 x 1000 dwellings (para 14)
	Waste water discharge l/day	253000	litres/day	2300 persons x 110l
	After STW treatment	227700	mg	Environmental permit of 1mg/l TP – operating at 90% (x 0.9mg/l)
Per year		83.11	kg	X 365 days
2020-2025	ADDITIONAL TOTAL PHOSPHORUS LOAD	415.5525	kg	X 5 years

Interim Phosphate Mitigation Measures

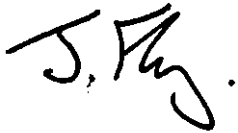
19. The NMP relied on achieving a level of offsetting by improving farming practices (Catchment Sensitive Farming). It is because it has become evident that this level of offsetting is unrealistic to achieve that NE and EA now say that targets in the NMP are unlikely to be delivered.
20. The NMP says that in this eventuality further improvements will need to be introduced at sewage treatment works. Improvements are usually introduced through Wessex Water's Price Review and subsequent Asset Management Plan. However, this is some way off. The next opportunity to determine regulatory improvements to works will not conclude until 2024.
21. In the light of the joint interim statement from NE and EA the local planning authorities are following a precautionary approach. Measures will be achieved through the planning process and therefore within its legal and policy framework, such as that for the use of planning conditions, Community Infrastructure Levy and s106 obligations.
22. An Annex to the NMP will be published. This annex will provide detail on the mitigation measures and how they will be delivered in order to achieve phosphorus neutral growth (examples are listed in Appendix 4); as well as monitoring arrangements. The parties will work together to set out more precisely for each one the amount of offsetting that can be achieved and its cost per dwelling⁶. There may also be additional measures to consider.
23. This information will provide certainty to the proposals of local plans and for individual developments that each will be phosphate neutral.
24. Beyond the interim period for phosphate neutral development the approach will take account of water company planning, as well as Government policy and legislation.

⁶ Appendix 3 of Annex 4 of the NMP already provides some baseline information enabling an estimate of the effectiveness of each of these measures and their cost to be identified.

25. The first review of the MoU will take place around March 2019, when the outcome of the modelling being undertaken by EA and NE (as set out in paragraph 3) is available; at which point the timing of the second review will be identified.

Signed

Signed on behalf of the Environment Agency

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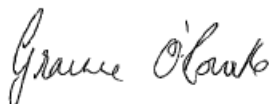
Position: Jim Flory, Area Environment Manager, Wessex Area.

Signed on behalf of Natural England

A handwritten signature in black ink, appearing to read 'Tom Lewis'.

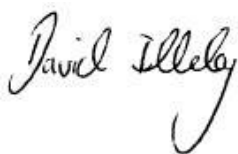
Position: Manager –Tom Lewis, Somerset, Wiltshire, Water in Wessex

Signed on behalf of New Forest District Council

A handwritten signature in black ink, appearing to read 'Grainne O'Rourke'.

Position: Grainne O'Rourke – Executive Head of Governance and Regulation

Signed on behalf of New Forest National Park Authority

A handwritten signature in black ink, appearing to read 'David Illsley'.

Position: David Illsley, Policy Manager

Signed on behalf of Wessex Water Services Ltd

A handwritten signature in black ink, appearing to read 'M. Wheeldon', written in a cursive style.

Position: Matt Wheeldon, Director of Assets and Compliance

Signed on behalf of Wiltshire Council

A handwritten signature in black ink, appearing to read 'T. Martiensen', written in a cursive style.

Position: Tim Martiensen, Director Economic Development and Planning

Dated 29th May 2018

APPENDIX 1: Wiltshire

Context

26. The Wiltshire Council Community Infrastructure Levy (CIL) Regulation 123 List expressly includes an item to support the 'Nutrient Management Plan - to address the level of phosphate in the River Avon'. This gives effect to a Council commitment confirmed in May 2015 that revenue would be taken out of the 'CIL pot' to direct towards appropriate ecological and green infrastructure measures to offset impacts at protected sites before other funds are allocated⁷. Ringfencing CIL receipts for these purposes prior to spending on any other infrastructure items ensures that the strict requirements of the Habitats Directive are met.
27. The Wiltshire Council Planning Obligations SPD notes that:
*"the mitigation of ecological impacts will generally continue to be managed through planning conditions and obligations as these matters are typically site specific. However, in exceptional circumstances off-site compensation, such as habitat creation or enhancement, may be required to offset the effects of development where onsite mitigation is not possible. For example, a financial contribution may be required to fund capital works and ongoing management by the council or relevant third parties. This would exclude funding of strategic HRA mitigation strategies, as identified in the Regulation 123 list, Infrastructure Delivery Plan..."*⁸
28. Wiltshire Council's Infrastructure Development Plan 3 (December 2016) refers to the 'Nutrient Management Plan' and identifies approximately £1.5m against "implementation of identified mitigation and management measures" under the NMP to address levels of phosphate in the River Avon⁹.
29. Mitigation and management measures have been developed in a draft Annex 2 to the NMP. They are therefore 'relevant infrastructure', in terms used in regulations governing the Community Infrastructure Levy¹⁰. (They are listed in Appendix 4 to the MoU.) As provided for by the Wiltshire Council Community Infrastructure Levy (CIL) Regulation 123 List, CIL will therefore be used to fund the mitigation and management measures listed.
30. Local planning authorities are prevented from seeking planning obligations towards 'relevant infrastructure' under s106 of the Town and Country Planning Act 1990¹¹. For other measures, not defined as 'relevant infrastructure'¹², local planning authorities may seek s106 planning obligations to offset the effects of development where onsite mitigation is not possible. Such measures would involve works which are not relevant infrastructure by virtue of being outside the control and remit of the NMP. The Council may pool s106 developer contributions towards an infrastructure type or project that is

⁷ Item 40 of the Council meeting, 12th May 2015

⁸ Paragraph 6.3, Wiltshire Council Community Infrastructure Levy, Revised Planning Obligations Supplementary Planning Document, (October 2016), Wiltshire Council

⁹ Page 14, Wiltshire Infrastructure Delivery Plan 3, 2011 – 2026, Appendix 1: Wiltshire Strategic Regional and General (Dec 2016), Wiltshire Council

¹⁰ S123 Community Infrastructure Levy Regulations 2010

¹¹ S123 Community Infrastructure Levy Regulations 2010

¹² S123 Community Infrastructure Levy Regulations 2010 defines 'relevant infrastructure' to mean—

(a) where a charging authority has published on its website a list of infrastructure projects or types of infrastructure that it intends will be, or may be, wholly or partly funded by CIL, those infrastructure projects or types of infrastructure, or
(b) where no such list has been published, any infrastructure.

not relevant infrastructure provided that since 6 April 2010 there have not been 5 or more planning obligations entered into for that infrastructure type or project¹³.

31. In this context, the approach to relevant planning applications is as follows.

Schemes for 10 dwellings or less

32. Mitigation measures will be achieved as an express part of a scheme and/or by the use of funding accumulated through Community Infrastructure Levy. Tariff style planning obligations cannot be sought for schemes involving ten or less dwellings¹⁴.
33. The impact of a small scheme is less than a large one and difficult to measure. The effect of small schemes however may be significant cumulatively. So it is more sensible to look at the overall phosphate load small schemes could generate and the amount of offsetting required in total.
34. The Community Infrastructure Levy in Wiltshire provides between £8,000 and £5,000 for the average dwelling¹⁵. Although further work is needed to develop more accurate costings for mitigation measures over the interim period, the range is between £10 and £100 per dwelling. Using this source of funding there can be sufficient offsetting to consider development involving ten or less dwellings to be phosphate neutral.

Schemes of more than 10 dwellings

35. Schemes of more than 10 dwellings are also subject to the Community Infrastructure Levy and therefore also make a proportionate contribution to interim mitigation measures.
36. Larger schemes may however have a much more marked individual impact at a point in time. In the case of larger schemes, it will be possible to estimate the scale of phosphate loading and then compare this against the scale and effectiveness of particular measures. It is feasible to address an individual impact and, as the local competent authority, the Council is required to use the best data available in order to comply with Habitats Regulations.
37. Within larger schemes, it should also be possible to introduce more offsetting measures on site through the form a development takes, recognising this may reduce a site's notional capacity for development. The parties commit to developing more detail on these means, their role and design as a part of the development of an Annex to the NMP.
38. In exceptional circumstances, it may be necessary to provide for further measures beyond those that will be detailed in an Annex of the NMP that are funded by CIL. As indicated in the NMP, this will involve a separate consideration of measures outside the control and remit of the mitigation measures in the NMP to improve sewage treatment. In addition to Community Infrastructure Levy allocated in accordance with the NMP, for larger scale schemes there is the possibility for funding to contribute towards the operation of sewage treatment works in order to ensure development is

¹³ The Government published a consultation on 5 March 2018- Supporting housing delivery through developer contributions which proposes to remove these restrictions where a CIL is in place.

¹⁴ Order of the Court of Appeal dated 13 May 2016, which give legal effect to the policy set out in the written ministerial statement of 28 November 2014G

¹⁵ Based on a dwelling floorspace of 95m² Wiltshire Council charge rates of £85 and £55 per sq m, New Forest District Council £80 per sq m.

phosphate neutral. Wessex Water, in discussion with the Environment Agency and Natural England, have proposed a special Performance Commitment in their business plan for the 2019 periodic review whereby the performance at specific STWs may be stretched to increase the removal of phosphorus. Such over-performance would warrant an out performance payment reward, would be funded by their general customer base, would last for five years to 2025, and is subject to regulatory approval (by OFWAT), due in 2019. Wiltshire Council might support further measures along these lines that may also be negotiated and funded by developer contributions as short term mitigation until the 2024 price review is agreed.

39. In other cases, and where significant scales of development are proposed, then the Council may seek developer contributions for capital investment in order to deliver offsetting.
40. EA and NE will advise the Council what works may need to be addressed in this manner. The parties to this MoU will work up the detail of what would be possible and from this what might be necessary to accommodate large scale development so that it can be considered phosphate neutral. The Council's local plans may set out the form, where and how such obligations may be sought.

Local Plans

41. The Wiltshire Housing Site Allocations Plan supplements housing land supply to help meet requirements up to 2026 set out in the adopted Wiltshire Core Strategy. A draft was published in July 2017 and it is intended to submit the plan to the Secretary of State in June.
42. Both EA and NE take the view that the approach and commitments contained in this memorandum provide greater certainty with respect to nutrient management, sufficient for the Council to conclude that the Plan will support phosphate neutral development that is unlikely to have adverse effects upon the integrity of the SAC.
43. The Council will lead the completion of an Annex of the NMP in partnership with the signatories to this MoU. The aim is to draft an Annex within 3 months of the date of this MoU. The Annex, once drafted, will detail measures to offset the additional phosphate load of the Plan's proposed scale of development so that it is compliant with HRA.
44. The Council will introduce the following text into the Plan, subject to the agreement of the Inspector examining its soundness:

'The Environment Agency and Natural England advise that all development within the River Avon catchment should be 'phosphate neutral' for an interim period until 2025. Beyond this time an approach will take account of water company planning, as well as Government policy and legislation. This is to guard against a further worsening of the condition of the SAC. An annex of the Nutrient Management Plan will explain measures to help deliver phosphate neutral development and how they will be delivered. Some measures are capable of being delivered as a part of housing development. Off-site measures are supported by Community Infrastructure Levy and there is also scope to improve the efficiency of sewage treatment works. (See Core Policy 69 - Protection of the River Avon SAC)' The definition of 'Phosphate neutral' is the additional phosphorus load generated by new development after controls at source, reduction by treatment and/or offsetting measures leads to no net increase in the Total Phosphorus load discharged to the River Avon SAC'.

APPENDIX 2: New Forest District (outside of the National Park)

45. In the New Forest, where phosphorus from a development may adversely affect the River Avon Special Area of Conservation (SAC), a planning permission will only be issued if subject to the imposition of a “Grampian” condition which prevents the occupation of the development until implementation of the necessary mitigation or offsetting has been secured.
46. The planning condition would give the developer the freedom to choose to provide mitigation by contributing to the Council’s Phosphorus Mitigation Strategy (when in place, and likely to be in the form of an update to the Avon Nutrient Management Plan), or by some other means of their own devising. Where mitigation is achieved by contributions, they would be payable regardless of any reliefs or exemptions to CIL for which a development may be eligible.
47. If developers chose to provide and fully fund their own alternative mitigation approach, it must be supported by an independent assessment under the Habitats Regulations, and would be evaluated on its own merits. Such evaluation will need to take account of the precautionary principle applying to such judgements and would need to mitigate the impact of the development to no less a degree as would be achieved by the agreed strategy. Any alternative proposal would need to be implemented before the condition could be discharged.

Proposed condition:

The development shall not be occupied until proposals for the mitigation or offsetting of the impact of phosphorus arising from the development on the River Avon Special Area of Conservation (SAC), including mechanisms to secure the timely implementation of the proposed approach, have been submitted to and approved in writing by the local planning authority secured. Such proposals must:

- (a) Provide for mitigation in accordance with the Council’s Phosphorus Mitigation Strategy (or any amendment to or replacement for this document in force at the time), or for other mitigation which achieves a phosphorous neutral impact from the development.;
- (b) Provide details of the manner in which the proposed mitigation is to be secured. Details to be submitted shall include arrangements for the ongoing monitoring of any such proposals which form part of the proposed mitigation measures.
- (c) The development shall be carried out in accordance with and subject to the approved proposals.

Reason: The impacts of the proposed development must be mitigated before any development is carried out in order to ensure that there will be no adverse impacts on the River Avon Special Area of Conservation (SAC) (adding, when it is in place and as applicable), in accordance with the Council’s Phosphorus Mitigation Strategy / the Avon Nutrient Management Plan.

48. The emerging Local Plan for New Forest District (outside of the National Park) proposes to include a habitat mitigation policy that includes reference to the need to achieve phosphorus neutral development in the River Avon catchment, and a

requirement that new residential development achieves the optional higher water efficiency standard of 110 litres per person per day.

New Forest National Park

49. The catchment of the River Avon extends into the west of the New Forest National Park. The Habitats Regulations Assessment of the National Park Authority's Local Plan Review has considered potential effects on water quality in the River Avon SAC and ruled out likely significant effects on the basis that none of the limited number of proposed housing allocations in the National Park, or any of the 'defined villages' where windfall development is supported, are within the catchment of the River Avon.
50. However, the Authority acknowledges that even small scale development could contribute towards in-combination effects on water quality in the River Avon and therefore the National Park Authority is committed to working with partners to address this. Appropriate planning conditions will be used to secure the appropriate mitigation or offsetting measures.
51. The National Park Authority's Submission draft Local Plan therefore confirms that the Authority will support the Environment Agency, Natural England, water companies and surrounding authorities in the development of a strategic solution to reducing impacts on the River Avon. The Local Plan also requires all new residential development in the National Park to achieve a required water efficiency standard of a maximum of 110 litres per person per day.

APPENDIX 3 Environment Agency and Natural England

52. The River Avon SAC Nutrient Management Plan for Phosphorus (NMP) has been produced to assess the impact of forecast growth and other pressures in order to achieve compliance with the Habitats Directive and facilitate development without affecting the integrity of the River Avon SAC. This is to help reduce and manage phosphorus levels in the Hampshire Avon Special Area of Conservation (SAC), in accordance with international obligations, principally in the EU Habitats, Wild Birds and Water Framework Directives. It also aids development and change in the Hampshire Avon catchment by ensuring the amount of phosphorus in the river does not increase and conflict with the conservation objectives for the SAC.
53. Conclusions from the NMP were that planned development outlined in the NMP, and which may result in a temporary increase in phosphorus level, would not result in a significant adverse effect to the integrity of the site, if diffuse reductions equivalent to “optimum” were delivered.
54. Emerging evidence suggests that the Environment Agency and Natural England have not yet got the commitments to deliver “optimum” diffuse pollution reduction across the Hampshire Avon and are unlikely to do so before 2021. Interim monitoring and modelling indicates however that work is on track to deliver “current” reductions as stated in the Nutrient Management Plan (NMP) and would hope to go beyond this with the increased catchment sensitive farming (CSF) resource that is now in the catchment.
55. The Environment Agency and Natural England, as part of an NMP Review currently being undertaken, are now considering what further actions on point source and diffuse sources will be needed to ensure targets will be met in the longer term. This emerging evidence identified through the NMP Review will be used to further refine modelling which is due to complete with recommendations on further action required to deliver Habitats Directive objectives, by March 2019.
56. In light of this evidence, in order for Local Authorities to provide certainty that development will not have an adverse effect on integrity on the SAC (and fulfil their obligations under the Habitats Directive), EA and NE recommended they demonstrate that growth will not add to the phosphate loading of the SAC; that it is phosphate neutral.
57. The EA and NE recognise that the Councils do not have a worked up and costed mechanism to offset the phosphorus from new development. To prevent a disruptive transitional period, and allow planning applications to be permitted, the EA and NE have agreed to the commitments in this MoU in support of the local planning authorities and Wessex Water.
58. Recommendations made by the Judicial Review may include proposals for water companies to increase the level of treatment at sewage treatment works across the Hampshire Avon, which will be considered under Price Review 24. The EA and NE cannot however guarantee that such recommendations will be implemented and local authorities may need to continue to provide offsetting beyond 2025.

Water Efficiency

59. Delivery of high water efficiency housing, will reduce the volume of high P water that is discharged to any sewage treatment works and then ultimately treated and discharged from the sewage treatment works to the environment. This will therefore reduce the “P” loading and so required offsetting that will be required by the Local Authorities.

APPENDIX 4 Initial Examples of Interim Mitigation Measures

Possible offsetting measure	Timescale
1 - Diverting Surface Water Flows and groundwater ingress Away from the Foul Sewage Network	Long term (post-2021)
2 - Addressing Misconnections	Short term (pre- 2021)
3 - Reducing Flows to the Foul Sewage Network through Water Efficiency Measures	Immediate
4 - Silt Traps and small farm wetlands on Agricultural Land	Short term –implemented in 1-2 years?
5 - Taking Land Out of Intensive Agricultural (arable or grass) Production through Offsetting	Long-term (post 2021)
6 – Change land-use from Intensive to Less Intensive Grass Production i.e. dairy and pig farming to cattle	Short term (1-2 years)
7 – Partnership funding for Water Environment Grant applications e.g. measures 4 and 8	Short term (pre- 2021)
8 - Diverting Surface Water Flows and groundwater ingress Away from the Foul Sewage Network	Long term (post-2021)