

# Habitats Regulations Assessment

Final Report for:

Lea Neighbourhood Area

December 2018



# Lea Neighbourhood Plan HRA

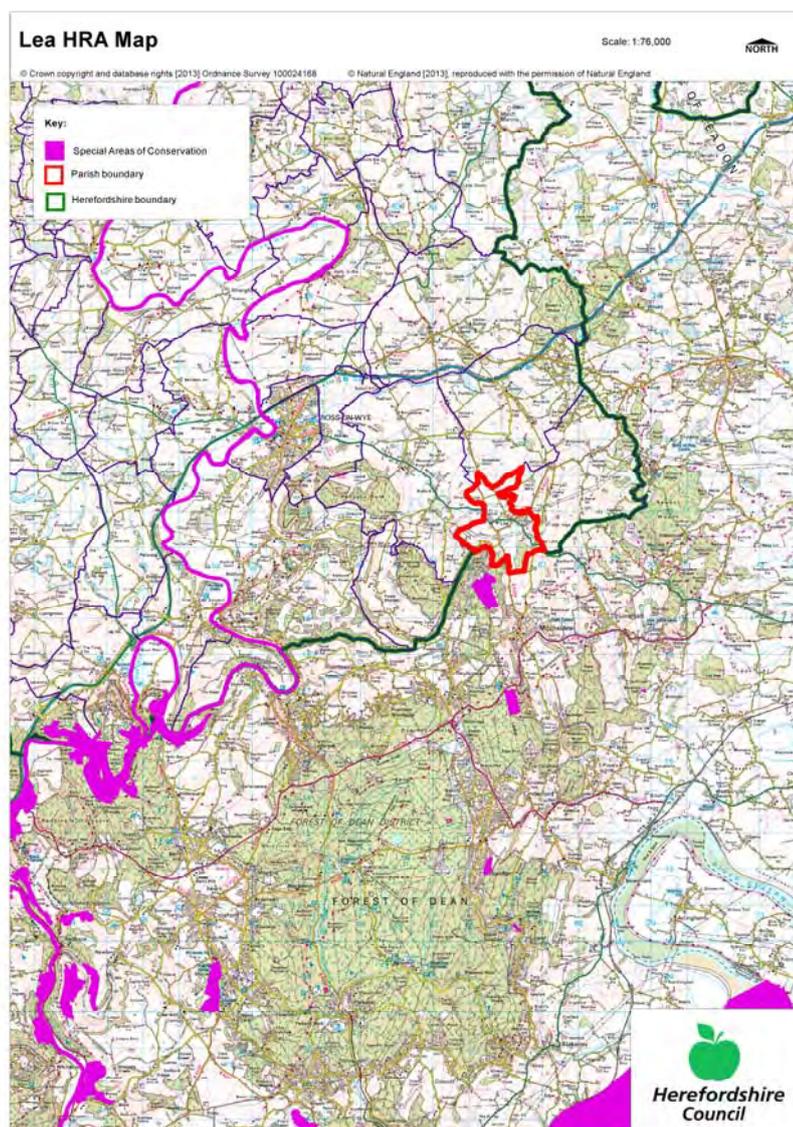
## HRA Screening Assessment

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## 1 Introduction

- 1.1 This Screening Assessment relates to a Neighbourhood Development Plan that is considered to be in general conformity with higher level strategic plans, such as the Herefordshire Core Strategy and the National Planning Policy Framework. The screening stage involves assessing broadly whether the final Neighbourhood Plan is likely to have a significant effect on any European site(s).
- 1.2 Lea Parish Council has produced a Neighbourhood Development Plan for Lea parish, in order to set out the vision, objectives and policies for the development of the Parish up to 2031. This HRA reviews the final Lea Plan (June 2018).
- 1.3 The NDP identifies two areas within Lea as the Lea settlement boundary, It also provides general criteria policies that clarify and given more detail to those within the Herefordshire Core Strategy.
- 1.4 This requires a high level screening assessment to build upon the HRA Screening Assessment Report for the Core Strategy. It should be read in combination with the Core Strategy Habitat Regulations Assessment Report and ensures that there will not be any significant impacts upon Natura 2000 sites.
- 1.5 The map below shows Lea Neighbourhood Area to which this assessment related.



## 2 The requirement to undertake Habitats Regulations Assessment of neighbourhood plans

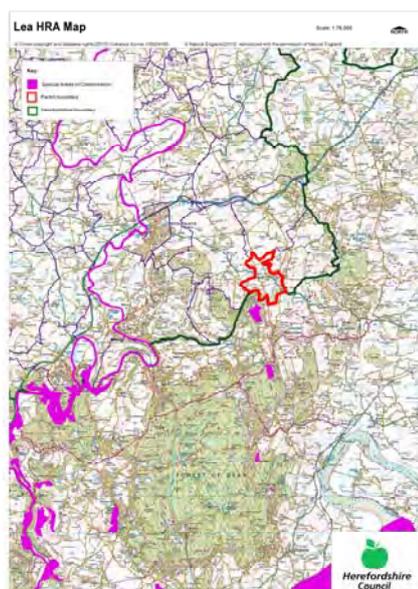
- 2.1 The requirement to undertake HRA of development plans was confirmed by the amendments to the “Habitats Regulations” published for England and Wales in July 2007 and updated in 2013. Therefore, when preparing its NDP, Lea Group Parish Council is required by law to carry out an assessment known as “Habitats Regulations Assessment”. It is also a requirement in Regulation 32 schedule 2 of the Neighbourhood Planning Regulations 2012.
- 2.2 Article 6(3) of the EU Habitats Directive provides that:  
*Any plan or project not directly connected with or necessary to the management of the [European] site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public.*
- 2.3 HRA is an impact-led assessment and refers to the assessment of the potential effects of a neighbourhood plan on one or more European sites, including Special Protection Areas (SPAs) and Special Areas of Conservation (SACs):
- **SPAs** are classified under the European Council Directive ‘on the conservation of wild birds’ (79/409/EEC; ‘Birds Directive’) for the protection of **wild birds and their habitats** (including particularly rare and vulnerable species listed in Annex 1 of the Birds Directive, and migratory species).
  - **SACs** are designated under the Habitats Directive and target **particular habitats** (Annex 1) and/or species (Annex II) identified as being of European importance.
- 2.4 For ease of reference during HRA, general practice has been that these three designations are collectively referred to as either **Natura 2000** or **European sites**. This means that a Screening Assessment is carried out with regard to the Conservation Objectives of the European Sites and with reference to other plans or projects to identify if any significant effect is likely for any European Site.
- 2.5 Herefordshire Council is aware of the recent judgement (People over Wind, Peter Sweetman vs Coillte). The Court of Justice of the European Union (CJEU) ruled that Article 6(3) of the Habitats Directive must be interpreted as meaning that mitigation measures should be assessed within the framework of an appropriate assessment and that it is not permissible to take account of measures intended to avoid or reduce the harmful effects of the plan on a European site at the screening stage. The initial screening undertaken in April 2014 and concluded that a full HRA would be required. Mitigation was not taken into account at this stage.
- 2.6 The purpose of this final HRA Report is to detail the findings of the screening of proposed changes to policies and consider if they significantly affect the conclusions of the earlier HRA Report (August 2017, December 2017 and August 2018) and reviewed in terms of the implications of *Sweetman*.

### 3 Methodology

- 3.1 Although the Lea NDP is not directly regarding the management of any European sites, it does include proposals for development which may affect European sites. Therefore, it is necessary under Regulation 102(1)(a) of the Habitats Regulations 2010 to undertake screening for likely significant effects on European sites.
- 3.2 The HRA of neighbourhood plans is undertaken in stages and should conclude whether or not a proposal or policy in a neighbourhood plan would adversely affect the integrity of the site in question. This is judged in terms of the implications of the plan for a site's 'qualifying features' (i.e. those Annex I habitats, Annex II species, and Annex I bird populations for which it has been designated) and are measured with reference to the conservation objectives for those qualifying features as defined by Natural England.
- 3.3 The first process is to undertake an initial screening report to determine the need to undertake the requirement for a HRA, this initial screening identifies whether the Plan could impact upon any European site that could be within the Neighbourhood Area or nearby.
- 3.4 If a European Site is within the Neighbourhood Area or the Neighbourhood Area could impact upon a European site then this will need to be taken into account and a full screening assessment will need to be undertaken.
- 3.5 The full screening stage consists of a description of the plan, identification of potential effects on European Sites, assessing the effects on European Sites. For Neighbourhood Plans the outcome should demonstrate there are no likely effects upon the European sites. If any likely effects occur then there will need to be amendments to the NDP made and be re-screened until all likely effects have been addressed.

### 4 Results of the Initial Screening Report and qualifying features of the European Sites

- 4.1 The initial Screening report (4<sup>th</sup> April 2014) found that the River Wye is 6.4km west of the parish and the parish is within the hydrological catchment of the River Wye. Figure 2 below highlights the location of River Wye SAC, Wye Valley and Forest of Dean Bat Sites And Wye Valley Woodlands in relation to the neighbourhood area.



- 4.2 There is 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. There is also a duty under the EU Habitats Directive to ensure that proposals for growth do not adversely affect habitats and biodiversity. This directives promotes to maintain, restore and enhance natural habitats and wild species within the protected sites.

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

- 4.3 The issues associated with maintaining the sites integrity include water levels and flow, water quality, eutrophication (nitrogen enrichment), sedimentation, disturbance and species maintenance.
- 4.4 The River Wye SAC can be sensitive to changes in water quantity and quality. As outlined within the Habitat Regulation Assessment to the Herefordshire Core Strategy, the water supply in this area comes from Dwr Cymru Welsh Water (DCWW) and no likely significant effects on European sites as a result of changes in water quality are expected in relation to the proportional growth outlined with the Herefordshire Core Strategy.
- 4.5 In relation to water quality, Policy SD4 of the Herefordshire Core Strategy indicates that any development should not undermine the achievement of water quality targets within the county's rivers. This should ensure that developments within the area can be accommodated within existing water discharge permits would not be likely to have a significant effect upon the River Wye SAC. This position is confirmed within the HRA of the Core Strategy in April 2015.
- 4.6 The addition of the Nutrient Management Plan for the River Wye SAC will support this policy. Lea Neighbourhood area that is served by a public sewage network and wastewater treatment works (WwTw). At regulation 14 consultation DCWW have commented that that there is no headroom currently available to accept any further development to that which already has extant planning consent at the Lower Cleeve Wastewater Treatment Works (WwTW). Therefore any further development in Lea will require further works to increase capacity in order to accommodate the specific growth. New development will require private foul treatment in line with policy SD4 Herefordshire Core Strategy.
- 4.7 For full details of the River Wye's attributes which contribute to and define their integrity and vulnerable data see Appendix 1 of the Lea Initial Screening Report. The Initial Screening Report, April 2014, can be found in Appendix 1 of this HRA report.
- 4.8 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 Lea Neighbourhood Plan may affect site integrity.
- 4.9 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 of the policies within the Lea NDP.

#### **Wye Valley and Forest of Dean Bat Sites SAC and Wye Valley Woodlands**

- 4.10 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. NDPs sites within 10 km of the Wye Valley and Forest of Dean Bat Sites 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.

- 4.11 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.
- 4.12 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.
- 4.13 For full details of the Wye Valley and Forest of Dean Bat Sites attributes and Wye Valley Woodlands which contribute to and define their integrity and vulnerable data see Appendix 1 of the Lea Initial Screening Report. The Initial Screening Report, August 2013, can be found in Appendix 1 of this HRA report.
- 4.14 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 Lea Neighbourhood Plan may affect site integrity.
- 4.15 The initial screening assessment indicated that a full screening assessment is required to assessment the likelihood of significant effects on the Wye Valley and Forest of Dean Bat Sites of the policies within the Lea NDP. For full details of the Wye Valley & Forest of Dean Bat Sites SAC attributes which contribute to and define their integrity and vulnerable data see Appendix 1 of the Lea Plan Initial Screening Report. The Initial Screening Report, August 2013, can be found in Appendix 4 of this HRA report. 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 Lea Plan Neighbourhood Plan may affect site integrity.
- 4.16 The initial options for the NDP were assessed to determine their environmental impact that could affect the Wye Valley & Forest of Dean Bat Sites SAC. Overall the majority of the options proposing any growth appear to depend on location and scale in relation to environmental impact. However the Lea NDP does not allocate sites within the plan. The Lea NDP area falls within 3km of the Wigpool Iron Mine SSSI, where there a number of identified bat roosts. Therefore a full HRA report is required at planning application stage when further details are known regarding new housing development and will be assessed on a case by case basis.
- 4.17 As the Lea Plan progresses from options onto their NDP policies, the Plan will need to identify ways in which the least effect on the Wye Valley & Forest of Dean Bat Sites SAC could be achieved, alongside taking forward the preferred options from the consultation from the community. If a majority of these options are taken forward either as standalone policies or in combination with other policies then the mitigation from these options will help to counter balance the effect of all new development within the Parish. A list of the options and site options assessed can be found in Appendix 1, and the Assessment matrix for the options can be found Appendix 2.

## 5 Description of the Lea Neighbourhood Development Plan

5.1 The final Lea NDP presents detailed policies for development in the Neighbourhood Area, which is equivalent to the group parish boundary, up to 2031. The Plan begins by introducing its preparation and highlighting its issues.

5.2 The NDP then details the vision for the Group Parish over the Plan period and nine objectives of how this will be achieved. The 9 objectives cover the following topics:

Preserve character and rural identity  
 Housing requirements  
 Protect natural environment and environmental quality  
 Meet business needs  
 Support tourism  
 Improve infrastructure  
 Enhance highway and transport safety  
 Support small scale renewable energy schemes  
 Support existing and community facilities

5.3 The initial options for the NDP (refer to appendix 2) were assessed to determine their environmental impact that could affect the River Wye SAC, Wye Valley Woodlands SAC, Wye Valley and Forest of Dean bat sites SAC. The parish considered eleven general options, which provided options of the type of plan they would be undertaking.

|  |
|--|
| <b>Option 1-</b> Do not prepare and NDP and let HC use the Core Strategy and Allocations Plan.                                   |
| <b>Option 2-</b> Use a criteria based policy for allocating sites - as in the informal consultation draft.                       |
| <b>Option 3-</b> Allocate sites  |
| <b>Option 4-</b> Define settlement boundaries as in the current version of the plan.   |
| <b>Option 5-</b> Criteria policy/settlement boundary/allocate sites.   |
| <b>Option 6-</b> Include green space and trees within settlements  |
| <b>Option 7-</b> Include design that respects the scale of the existing area   |
| <b>Option 8-</b> Include developments built in a style, and with materials, in keeping with existing local traditional buildings |
| <b>Option 9-</b> Include better pedestrian and cycling access to local facilities/public transport pick-up points.               |
| <b>Option 10-</b> Signage, advertising and street furniture that respects the locality   |
| <b>Option 11-</b> Include minimum standards for living space in dwellings  |

5.4 All of which indicated towards growth however all the options would be seeking to provide proportional growth in line with the Core strategy and are therefore unlikely to have a significant impact on the SAC.

5.5 As Lea Neighbourhood Plan progressed from options to draft NDP policies, the Plan needed to identify ways in which the least effect on the River Wye SAC, Wye Valley Woodlands SAC and Wye Valley and Forest of Dean Bats site SAC could be achieved, alongside taking forward the preferred option from the consultation from the community. A list of the options assessed can be found in previous HRA assessments, and the Assessment matrix for the options can be found HRA August 2017 version.

5.6 The plan has not allocated sites as houses have already been developed or granted would exceed therefore the plan has considered using criteria based plan.

5.7 The NDP also sets out 7 general policies on various topics based on the objective headings above and also for group parish, these include:

- 1-The right housing in the right place
- 2-Surface and foul water drainage
- 3-A valued environment in which to live
- 4-Large scale polytunnels deleted post examination
- 4-Sustaining open green spaces
- 5-Supporting a thriving community

- 6-Delivery of local infrastructure
  - 7-Community facilities
- 5.8 The NDP proposes two areas to identify the settlement boundary of Lea. No sites have been allocated in the neighbourhood plan as Lea has already exciting their proportionate growth target envisaged by Policy RA2 of the Local Plan (Core Strategy).

## **6.0 Assessments undertaken to date of the emerging Lea NDP policies**

- 6.1 Regulation 102 of the Habitats Regulations 2010 requires that a Screening Assessment be undertaken, in order to identify the 'likely significant effects' of an NDP. Accordingly, a screening matrix was prepared and this determined the extent to which any of the policies within the Lea NDP would be likely to have a significant effect on the River Wye SAC. This has been repeated at each statutory stage of the NDP consultation process.
- 6.2 The findings of those screening matrix can be found within the previous versions of the HRA report and its addendum. This final report aims to bring together these assessments and review in light of the final examination modifications and the implications of the *Sweetman* case.

### **Screening of the draft plan (Reg14)**

- 6.3 The screening matrix took the approach of screening each policy and objective individually, which is consistent with current guidance. The results from the HRA reports for the Herefordshire Local Plan (Core Strategy) were also taken into consideration.
- 6.4 None of the Lea NDP objectives and policies (August 2017) were concluded to not be likely to have a significant effect on the European site. Although Lea parish falls within the hydrological catchment area of the *River Wye (including Lugg) SAC, and Wye Valley and Forest of Dean Bat Sites SAC, Wye Valley Woodlands SAC* the parish is not in close proximity to the river itself. Core Strategy policy SD3 and SD4 together with the Nutrient Management Plan will ensure that development can only occur if policy requirements are met.
- 6.5 In many cases this is because the policies themselves would not result in development, i.e. they related instead to criteria for development and the SAC itself is not within the parish. In several cases the policies also included measures to help support the natural environment including biodiversity.
- 6.6 It is unlikely that the Lea Neighbourhood Plan will have any in-combination effects with any Plans from neighbouring parish council due to the level of growth proposed is of the same that is proposed for the Ross on Wye Housing Market Area in the Herefordshire Core Strategy.
- 6.7 Therefore it was concluded that the **Reg14 Lea NDP would not have a likely significant effect on the River Wye (including Lugg) SAC, Wye Valley and Forest of Dean Bat Sites SAC, Wye Valley Woodlands SAC.**

### Screening of the submission plan (Reg 16)

- 6.8 The Submission NDP incorporates suggestions made by consultees during the Regulation 14 Draft Plan consultation, by adding clarity and emphasis throughout the document. There have been some additions to the criteria in some of the policies which are strengthening up the protection of the area, prevention of flooding, water quality measures added and generally a reduction of adverse impact upon the River Wye SAC Wye Valley Woodlands SAC and Wye Valley & Forest of Dean Bat Sites SAC.
- 6.9 Following the Regulation 14 Draft Plan consultation. Changes to Lea 1 adds further safeguards within this policy, this has been added in response to comments and to provide clarity and criteria to ensure development takes into consideration scale of development in relation to its surroundings. Policy further information has been added to the policy to cover impact on local sewage networks. Policy 8 becomes more specific and easier to implement as it now list the community areas the NDP wish to protect and enhance.
- 6.10 The revised NDP policies are therefore unlikely to result in significant effects on the European sites, a conclusion of which is based on assumptions and information contained within the Lea NDP. Therefore the earlier conclusion that the River Wye (including River Lugg) SAC, **Wye Valley Woodlands SAC and Wye Valley & Forest of Dean Bat Sites SAC remains valid.**

### 7 Assessment of the 'likely significant effects' of the submission Lea NDP (June 2018) – Rescreening during examination (July 2018) and implications of *Sweetman* case

- 7.1 In light of the *Sweetman* case all policies have been reviewed to ensure compliance with the ruling. The finding can be found in appendix 3.
- 7.2 The findings of the screening matrix can be found in the Screening Matrix in the appendix. Colour coding was used to record the likely impacts of the policies on the European site and its qualifying habitats and species as shown in the table 1 below.

|       |  |
|-------|--|
| Red   | There are likely to be significant effects |
| Green | Significant effects are unlikely           |

- 7.3 Following the recent *Sweetman* judgement, it is not permissible to take account of measure intended to avoid or reduce the harmful effects of the plan on the River Wye SAC Wye Valley Woodlands at this final screening stage. Any likely significant effects would require an Appropriate Assessment.

### Screening of the final plan post examination (December 2018)

- 7.4 The final NDP incorporates the modifications that the examiner has recommended within the examiner's report. These changes are to ensure that the plan meets the Basic Conditions. No new policies have been added following the examination, this has not added any new information that but has amalgamated a number of criteria deleted from other policies and Policy 4, Polytunnels has been deleted. Most of the amendments have involved wording changes for clarity rather than emphasis or direction. However there have been some minor word changes to the policies. The recommendations suggested give policies greater flexibility improving conformity to the local plan. Policies 3, 5 and 6 have been rescreened as a significant amount of the wording has been amended.

- 7.5 The revised NDP policies following examination are therefore unlikely to result in significant effects on the European sites, a conclusion of which is based on assumptions and information contained within the Lea NDP. Therefore the earlier conclusion that the River Wye (including River Lugg) SAC, **Wye Valley Woodlands SAC and Wye Valley & Forest of Dean Bat Sites SAC remains valid.**

## 8 Conclusions from the Screening Matrix

- 8.1 None of the final Lea Neighbourhood Plan (December 2018) policies were concluded to be likely to have a significant effect on the River Wye SAC, Wye Valley and Forest of Dean Bat Sites and Wye Valley Woodlands SAC.
- 8.2 This is partly down to scale and extent of plan also the Lea Plan does not allocate sites. For the policies contained in the plan there is sufficient policy criteria in Core Strategy policies LD2, SD3 and SD4 to ensure that development can only occur if these criteria are met.
- 8.3 The final plan allocates settlement boundaries for development within Lea. In April 2017, 101 houses have either been granted or granted planning permission, exceeding the housing target figure of 43 dwellings. The settlement area appears to be enough capacity within the two identified areas to meet the target housing growth. Due to the location of these areas, i.e. not directly on the river banks or adjacent to a watercourse that feeds into the River, and due to the scale of the sites for homes and businesses being small (no larger than 3 dwellings per plot and retail development under 80sq metres) and at the scale of growth that is required by the Herefordshire Core Strategy, these would not have an appreciable effect on the River Wye SAC, i.e. that they were not likely to be significant. The Wye Valley and Forest of Dean Bat Sites and Wye Valley Woodlands.
- 8.4 Dwr Cymru Welsh Water (DCWW) have stated for the Core Strategy that there is currently no existing capacity with regards to permitted headroom in the Sewerage Treatment works serving the Lea area to continue to treat the water from the amount of housing provided for in the Core Strategy policies. In response to the regulation 14 consultation DCWW have commented the only treatment works in Lea is Lower Cleeve WwTw, this plant will not be able to accommodate new growth. Therefore it is likely that new development will require private foul treatment required private foul treatment in line with Core Strategy Policy SD4.
- 8.5 Policy SD4 of the Core Strategy of the NDP indicate that development would not be permitted if wastewater treatment and water quality cannot be assured. In addition, the Nutrient Management Plan for the River Wye SAC should ensure that development within Herefordshire which can be accommodated within existing water discharge permits would not be likely to have a significant effect upon the River Wye SAC.
- 8.6 No mitigation measures have been included within the screening of the policies of the NDP. Policies of the Core Strategy and the NDP will form part of the development plans. A key requirement of the Core Strategy is to meet the Water Framework Directive.
- 8.7 Policy SD4 of the Core Strategy of the NDP indicate that development would not be permitted if wastewater treatment and water quality cannot be assured.
- 8.8 Policy LD2 of the 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. The Lea NDP does not allocate sites so an AA is not required as the plan is criteria based consisting of mostly protective policies it is determined unlikely to have a significant impact on the SACs. However it is likely an AA is likely to be required at planning application stage to further determine the impact on the Wye due to the proximity to the

falls within 3km of the Wigpool Iron Mine SSSI , this has been identified as a significant area where bat activity and roosts are located.

- 8.9 This review and rescreening in addition to the revisions to the policies from the examination, have been found to be unlikely to result in significant effects **on the River Wye (including Lugg) SAC, Wye Valley and Forest of Dean Bat Sites SAC, Wye Valley Woodlands SAC.**

## **9 Identification of other plans and projects which may have ‘in-combination’ effects**

- 9.1 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 publication of the Herefordshire Local Plan Core Strategy Habitats Regulations Assessment (Oct 2015).
- 9.2 It is seen that as this NDP does not go over and beyond the requirements set out in the Core Strategy.
- 9.3 Adjacent neighbourhood plans include Weston under Penyard (this has been adopted) and Linton who are processing a neighbourhood plan. Aston Ingham will be in the Rural Areas DPD, Lea is also on the border of Gloucestershire. These plans have not gone over and beyond the requirements set out within the Core Strategy for their area.
- 9.4 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 work on the Nutrient Management Plan, to ensure the favourable conservation status of the SAC in respect of phosphate levels as soon as possible and at the latest by 2027, have both been considered as part of the in-combination assessment.
- 9.5 It is unlikely that the final Lea 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.

## **10.0 Conclusion**

- 10.1 With reference to sections 6 to 9 above, the modifications to the NDP are not considered to affect the findings of the previous HRA report. Equally the review in light of the *Sweetman* case are also not considered to affect the previous findings.
- 10.2 Therefore the earlier conclusions that the **Lea NDP will not have a likely significant effect on the River Wye SAC (including Lugg), Wye Valley and Forest of Dean Bat Sites SAC, Wye Valley Woodlands SAC** still remains valid.

## **11.0 Next steps**

- 11.1 This final report will be published alongside the final Lea NDP and the earlier HRA Report and its addendum. This will be subject to a consultation with the statutory bodies prior to the final adoption/making of the Lea NDP.

# 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>                  | Lea Neighbourhood Area |
| <b>Parish Council:</b>                      | Lea Parish Council     |
| <b>Neighbourhood Area Designation Date:</b> | 13/05/2014             |

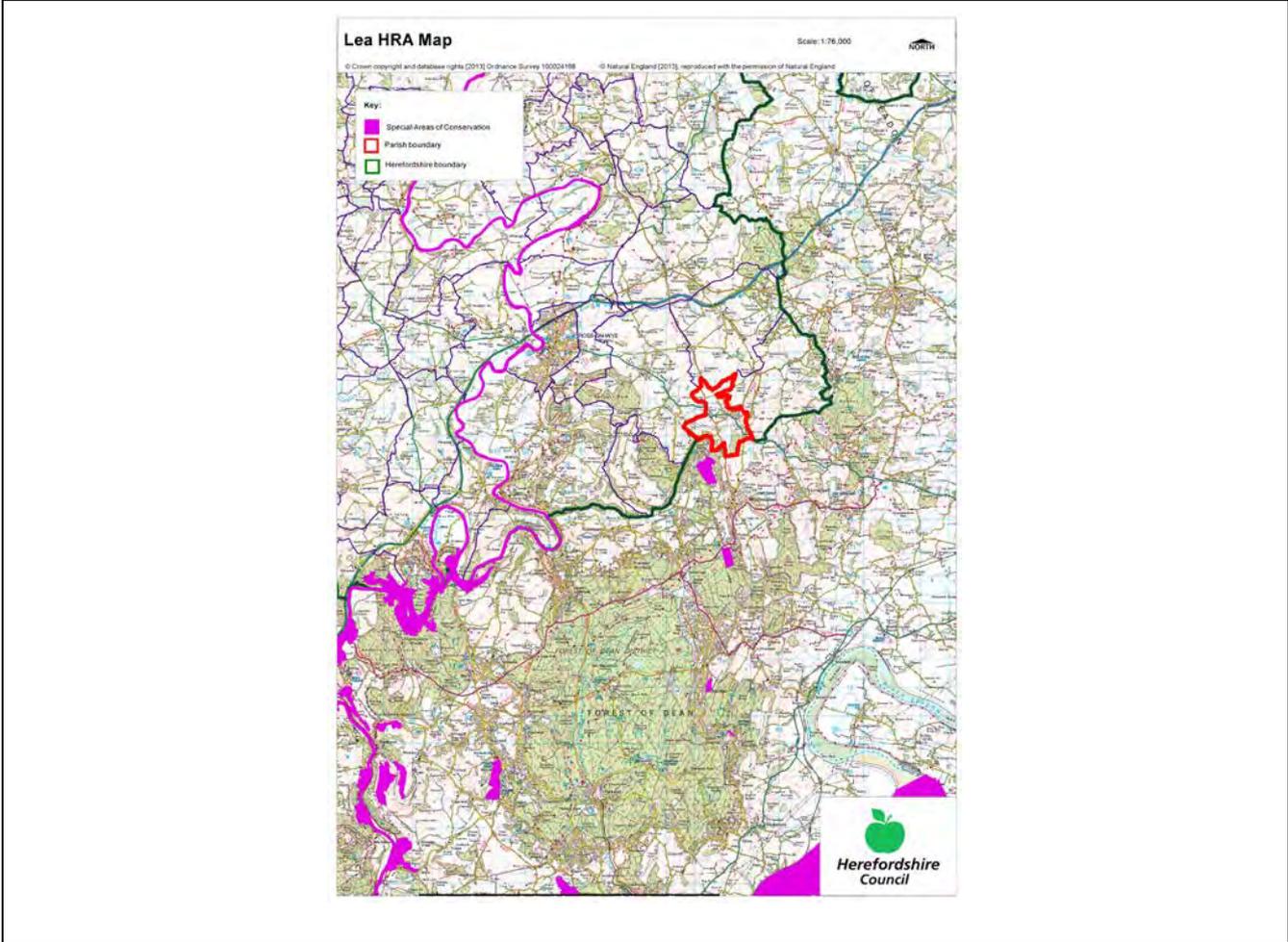
### **Introduction**

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.

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**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?    | N | The River Wye/Lugg SAC is 6.4km away from the Parish.            |
| Is the Neighbourhood Area in the hydrological catchment of the River Wye (including the River Lugg) SAC? | Y | The Parish is within the hydrological catchment of the River Wye |
| If yes above, does the Neighbourhood Area have mains drainage to deal with foul sewage?                  | N | There is no mains drainage within the Parish.                    |

**Downton Gorge SAC:**

|   |   |   |
|---|---|---|
| Is the Neighbourhood Area within 10km of Downton Gorge SAC? | N | Downton Gorge is 55km 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 44km 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 | Wye Valley and Forest of Dean Bat Sites are 0.3km away from the Parish. |
|--|---|---|

**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 | Wye Valley Woodlands are 9.6km away from the Parish. |
|--|---|--|

**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 Lea 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 & 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 Lea 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.

| <b>SEA features</b>                         | <b>Total</b>     | <b>Explanation</b>  | <b>SEA required</b> |
|---|------------------|---|---------------------|
| Air Quality Management Areas (AQMA)         | 0                | There are no AQMAs within the Group Parish  | N                   |
| Ancient Woodland                            | 11               | Howley Grove; Cornage Wood; Purlieu Wood (border); Hengrove and Warmhill Woods (border); Penyard Park (border); Withymoore Wood (border); Newhouse Wood (border); Hay Wood (border); Newent Wood (border); Moate Wood (border); Reslaw Wood (border)  | Y                   |
| Areas of Archaeological Interest (AAI)      | 0                | There are no AAI's within the Parish  | N                   |
| Areas of Outstanding Natural Beauty (AONB)  | 0                | There are no AONB's within the Parish   | N                   |
| Conservation Areas                          | 0                | There are no Conservation Areas within the Parish   | N                   |
| European Sites (SAC)                        | 1                | Wye Valley & Forest of Dean Bat Sites (border)  | Y                   |
| Flood Areas/Zones                           |                  | There is a small area in the west of the Parish   | Y                   |
| Geoparks                                    | 1                | Malvern Hills Geopark (border)  | Y                   |
| Listed Buildings                            | Numerous         | There are numerous listed buildings throughout the Parish   | Y                   |
| Local Sites (SWS/SINCS/RIGS)                | 9 (SWS)          | Howley Grove; Fields near Norton Farm; Lea Bailey Enclosure (border); May Hill (border); Meadow near Coldwell Cottage (border); Marsh near Haygrove Farm (border); Withymoore and Baldwins Wood (border); Reslaw and Newhouse Woods and adjoining woodlands (border); Aston Ingham Meadows (border) | Y                   |
| Long distance footpaths/trails              | 0                | There are no long distance footpaths/trails within the Parish   | N                   |
| Mineral Reserves                            | 0                | There are no Minerals Reserves Sites within the Parish  | N                   |
| National Nature Reserve (NNR)               | 0                | There are no NNR's within the Parish  | N                   |
| Registered & Unregistered Parks and Gardens | 5 (unregistered) | Burton Court, Linton (border); Bolitree Castle (border); Weston Hall (border); Penyard Park (border); Rudhall House (border)  | Y                   |
| Scheduled Ancient Monuments (SAM)           | 1                | Roman Town of Ariconium (border)  | Y                   |

|   |   |  |   |
|---|---|--|---|
| Sites of Special Scientific Interest (SSSI) | 9 | Wigpool Ironstone Mine (Favourable) (border); May Hill (Unfavourable Recovering) (border); Hobbs Quarry, Longhope (Favourable) (border); Longhope Hill (Unfavourable Recovering) (border); Scully Grove Quarry (Unfavourable No Change) (border); Aston Ingham Meadows (Favourable) (border); Puddlebrook Quarry (Favourable) (border); Stenders Quarry (Favourable) (border); Linton Quarry (Unfavourable Declining) (border) | Y |
|---|---|--|---|

**Decision Notification:**

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

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

**Assessment date: 04/04/2014**

**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.

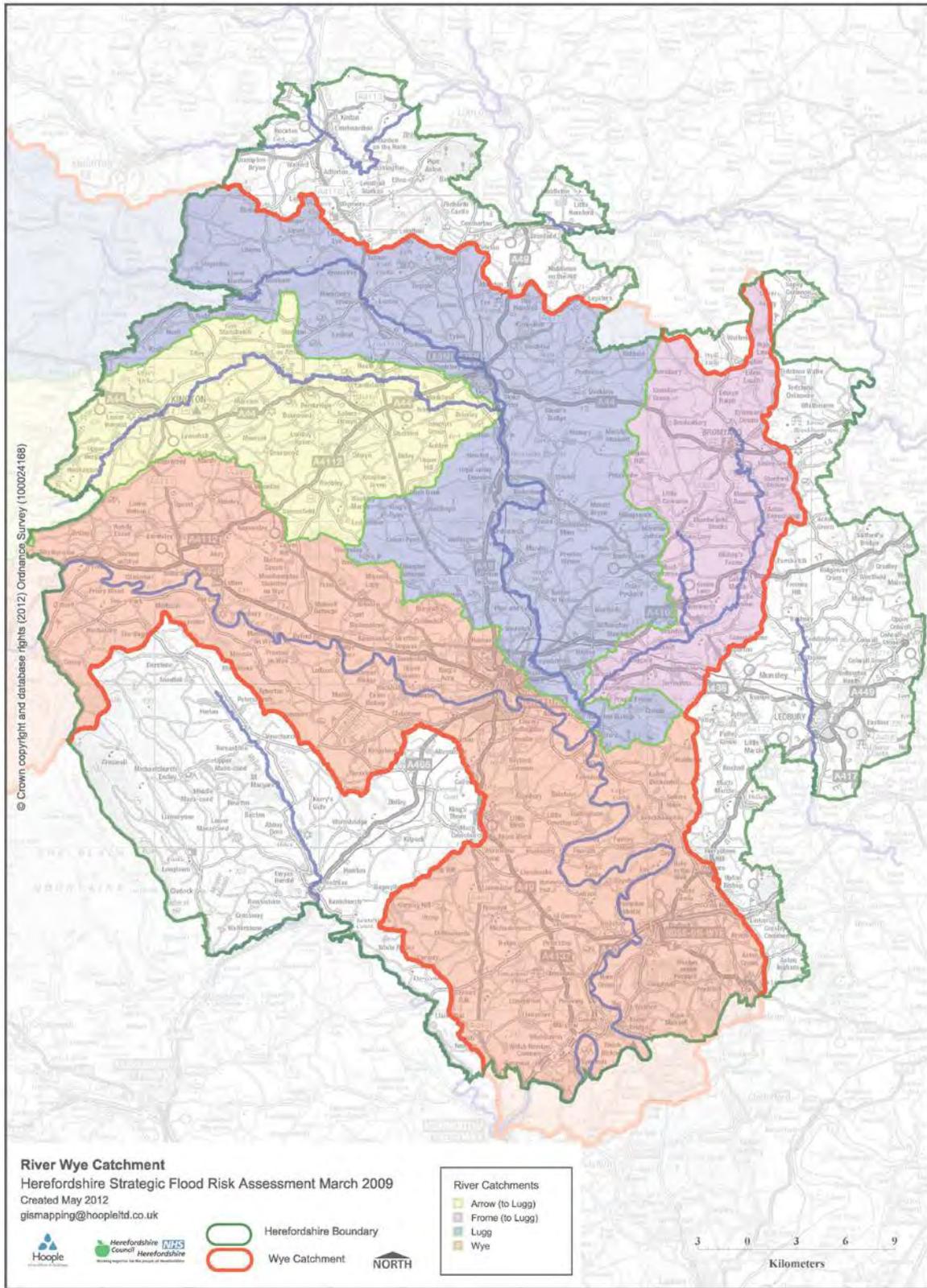
Greater Horseshoe Bat: Large buildings, pasture, edge of mixed deciduous woodland and hedgerows. Mixed land-use especially south-facing slopes, favours beetles, moths and insects they feed on. During the winter they depend on caves, abandoned mines and other underground sites for undisturbed hibernation. 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

**Table 1: HRA Screening of Emerging Neighbourhood Development Plan Objectives, Options and Policies**

Parish Council Name: Lea Parish Council

NDP Title: Lea Neighbourhood Plan

Date undertaken: August 2017

| NDP objectives, options policies  | HRA Screening of Emerging NDP objectives, options and policies                                      |   |  |   |  |
|---|---|---|--|---|--|
|   | Likely activities (operations) to result as a consequence of the objective/option/policy            | Likely effect if option implemented. Could they have Likely Significant Effects (LSE) on European Sites? (Yes/No, with reasons)             | European Sites potentially affected  | Mitigation measures to be considered, as necessary, through redraft of objective/option/policy and to be considered as part of Appropriate Assessment                     | If recommendations are implemented, would it be possible that it would result in no LSE? (Yes/No with reasons)   |
| Option 1- Not prepare and NDP and let HC use the Core Strategy and Allocations Plan.                | No NDP to determine planning applications.  | Criteria policies within the Core Strategy would guide further development. Specific policies and proposals for the parish would not exist. | River Wye (including River Lugg) SAC<br><br>Wye Valley Woodlands SAC.<br><br>Wye Valley & Forest of Dean Bat Sites SAC | N/A   | N/A  |
| Option 2- Use a criteria based policy for allocating sites - as in the informal consultation draft. | Small scale proportionate growth where the location would be determined by a criteria based policy. | Uncertain as to the impact on the European sites as dependant on the location of the development.   | River Wye (including River Lugg) SAC<br><br>Wye Valley Woodlands SAC.<br><br>Wye Valley & Forest of Dean Bat Sites     | Criteria based housing policy would require to include reference to mitigation measures to avoid any non-disturbance effects on the River Wye via its catchment. Policies | No, development in line with the Local Plan (Core Strategy) and the policy safeguards which exist within the Core Strategy should avoid or mitigate any likely |

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|  |   |  |   |   |  |
|--|---|--|---|---|--|
|  |   |  | SAC   | <p>within the Core Strategy help to mitigate effect of development.</p> <p>Policy would need to take account of the proportional growth requirements of the Core Strategy and potential headroom capacity at the local STW. Policies within the Core Strategy help to mitigate effect of development.</p> | <p>significant effects.</p> <p>Policy criteria should be included within the NDP which reflects this. Further assessments will be undertaken at draft policy stage.</p>  |
| Option 3-Allocate sites                                  | Small scale proportionate growth on specific sites identified on a proposals map. | Greater degree of certainty over the impact of future development on the European sites, as the location of housing would be pre-determined and not left to market forces. | <p>River Wye (including River Lugg) SAC</p> <p>Wye Valley Woodlands SAC.</p> <p>Wye Valley &amp; Forest of Dean Bat Sites SAC</p> | <p>Specific environmental issues could be investigated during the site search and be positively addressed within the policy wording.</p> <p>Policy would need to take account of the proportional growth requirements of the Core Strategy and potential headroom capacity at the local STW.</p>          | <p>No, development in line with the Local Plan (Core Strategy) and the policy safeguards which exist within the Core Strategy should avoid or mitigate any likely significant effects.</p> <p>Policy criteria should be included within the NDP which reflects this. Further assessments will be undertaken at draft policy stage.</p> |
| Option 4- Define settlement boundaries as in the current | Small scale proportionate growth within a defined settlement boundary             | Any settlement boundary would need to be designated to ensure that sufficient capacity was   | River Wye (including River Lugg) SAC  | Additional criteria would be required when formulating the accompanying   | No, development in line with the Local Plan (Core Strategy) and the policy   |

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|  |   |   |  |  |  |
|--|---|---|--|--|--|
| version of the plan.                                     | area.   | included to permit the proportional growth requirements within Policy RA2 of the Core Strategy. Uncertain as to the impact on the European sites as dependant on the location of the development                  | Wye Valley Woodlands SAC.<br><br>Wye Valley & Forest of Dean Bat Sites SAC   | settlement boundary policy to ensure that no likely significant effects could occur.<br><br>Policy would need to take account of the proportional growth requirements of the Core Strategy and potential headroom capacity at the local STW. | safeguards which exist within the Core Strategy should avoid or mitigate any likely significant effects.<br><br>Policy criteria should be included within the NDP which reflects this. Further assessments will be undertaken at draft policy stage. |
| Option 5-Define settlement boundaries and allocate sites | Allocation of sites for housing or other uses would give certainty to future development. Specific environmental issues could be investigated during the site search and be positively addressed within the policy wording. The designation of a settlement boundary will give additional certainty and help define those areas considered as the built form and open countryside | Pursuing this option would give greater certainty over future development within the area particularly within the River Wye catchment. If required mitigation criteria can be added to site allocations policies. | River Wye (including River Lugg) SAC<br><br>Wye Valley Woodlands SAC.<br><br>Wye Valley & Forest of Dean Bat Sites SAC | n/a  | No; policy criteria can be added to any allocation policy to mitigate.   |
| Option 6-Include green space and trees within            | Green space identified in Lea. This will be   | None identified.  | River Wye (including   | This option would not directly lead to   | No, this option will not directly lead to  |

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|  |   |                  |   |   |  |
|--|---|------------------|---|---|--|
| settlements  | <p>safeguarded against development.</p> <p>Important trees are identified.</p>  |                  | <p>the River Lugg) SAC</p> <p>Wye Valley Woodlands SAC.</p> <p>Wye Valley</p>   | <p>development, instead it intends to safeguard important green spaces and trees within the NDP Area. This option will help Lea to avoid inappropriate development and mitigate impact caused from development.</p> | <p>development instead it provides criteria to help safeguard local greenspace and trees.</p>  |
| <b>Option 7</b> -Include design that respects the scale of the existing area   | <p>Development designed that is in scale and keeping with its surrounding context.</p>  | None identified. | <p>River Wye (including River Lugg) SAC</p> <p>Wye Valley Woodlands SAC.</p> <p>Wye Valley &amp; Forest of Dean Bat Sites SAC</p> | <p>This option will help Lea to avoid inappropriate development and mitigate impact caused from development.</p>  | <p>No, this option will not directly lead to development instead it provides design criteria to ensure developments are in keeping with the village.</p> |
| <b>Option 8</b> -Include developments built in a style, and with materials, in keeping with existing local traditional buildings | <p>Development designed that is in keeping with its surrounding context. Using appropriate materials in keeping with the local village scape.</p> | None identified. | <p>River Wye (including River Lugg) SAC</p> <p>Wye Valley Woodlands SAC.</p> <p>Wye Valley &amp; Forest of Dean Bat Sites SAC</p> | <p>This option will help Lea to avoid inappropriate development and mitigate impact caused from development.</p>  | <p>No, this option will not directly lead to development instead it provides design criteria to ensure developments are in keeping with the village.</p> |
| <b>Option 9</b> -Include better pedestrian and cycling access to local facilities/public transport pick-                         | <p>Increase in walking and cycling</p> <p>Safer routes for cycling</p>  | None identified. | <p>River Wye (including River Lugg) SAC</p> <p>Wye Valley</p>   | <p>This option will help Lea to avoid inappropriate development and mitigate impact caused</p>  | <p>No, this option will not directly lead to development instead it provides criteria to ensure sustainable</p>  |

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|  |   |                  |  |   |   |
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| up points.   | Decrease in air pollution   |                  | Woodlands SAC.<br>Wye Valley & Forest of Dean Bat Sites SAC  | from development.   | transport access  |
| <b>Option 10</b> -Signage, advertising and street furniture that respects the locality | Development designed that is in scale and keeping with its surrounding context.<br><br>Improvement within the public space in village area. | None identified. | River Wye (including River Lugg) SAC<br><br>Wye Valley Woodlands SAC.<br><br>Wye Valley & Forest of Dean Bat Sites SAC | This option will help Lea to avoid inappropriate development and mitigate impact caused from development. | No, this option will not directly lead to development instead it provides design criteria to ensure developments are in keeping with the village. |
| <b>Option 11</b> -Include minimum standards for living space in dwellings              | Development designed that is in scale and keeping with its surrounding context.   | None identified. | River Wye (including River Lugg) SAC<br><br>Wye Valley Woodlands SAC.<br><br>Wye Valley & Forest of Dean Bat Sites SAC | This option will help Lea to avoid inappropriate development and mitigate impact caused from development. | No, this option will not directly lead to development instead it provides design criteria to ensure developments are in keeping with the village. |
|  |   |                  |  |   |   |

# Appendix 3

**HRA Screening of Neighbourhood Development Plan Policies**Date undertaken: **July 2018**Core Strategy HRA version: **Adopted Core Strategy 2011-2031**

| NDP objectives and policies                  | HRA Screening of final NDP objectives and policies   |   |   |   |  |
|--|--|---|---|---|--|
|  | Likely activities (operations) to result as a consequence of the objective/option/policy   | Likely effect if option implemented. Could they have Likely Significant Effects (LSE) on European Sites?  | European Sites potentially affected   | Would it be possible that it would result in any LSE? | Requirement for an Appropriate Assessment  |
| Lea 1- The right housing in the right place. | <p>Housing sites identified.</p> <p>Promotion of achieving housing target.</p> <p>Increased vehicle traffic</p> <p>Increased demand for water abstraction and sewage treatment</p> <p>Sustainable housing growth</p> | <p>Small scale development proposed (plots of 6 or less) Unlikely that there will be any significant effects on the European Site. All developments are required to meet the criteria of LD2 to protect biodiversity and wildlife, and Policy SD4 which seeks to ensure water quality of the SAC is not detrimentally effected.</p> | <p>River Wye (including the Lugg SAC).(6.4km away from parish)</p> <p>Wye Valley &amp; Forest of Dean Bat Sites SAC (0.3km away from parish)</p> <p>Wye Valley Woodlands SAC (9.6km away from parish)</p> | No.   | <p>No, No. The scale and extent of potential housing development is unlikely to have a significant impact on the SAC. Implementation of Core Strategy policy SD4, LD2, SD1 to grant planning permission will ensure water quality issues are addressed.</p> <p>The Lea NDP area falls within 3km of the Wigpool Iron Mine SSSI. Therefore a full HRA report is required at planning application stage when further details are known regarding new housing development and will be assessed on a case by case basis.</p> |
| Lea 2-Surface and foul water drainage        | <p>Strive to reduce impact of flooding within Lea.</p> <p>New development designed to appropriately reduce flood</p>   | <p>Unlikely that there will be any significant effects on the European Site. This policy strives to alleviate</p>   | <p>River Wye (including the Lugg SAC).(6.4km away from parish)</p> <p>Wye Valley &amp; Forest of</p>  | No.   | <p>No, implementation of Core Strategy policy SD4, LD2, SD1 to grant planning permission will ensure water quality issues are addressed.</p>   |

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|  |  |   |   |     |   |
|--|--|---|---|-----|---|
|  | <p>risk.</p> <p>Sustainable design promoted.</p> <p>Infrastructure development phased in line with infrastructure works within the plan period.</p>  | <p>flooding within the Parish. All developments are required to meet the criteria of Policy LD2 to protect biodiversity and wildlife, and SD4 which seeks to ensure water quality of the SAC is not detrimentally effected.</p>   | <p>Dean Bat Sites SAC (0.3km away from parish)</p> <p>Wye Valley Woodlands SAC (9.6km away from parish)</p>   |     | <p>The Lea NDP area falls within 3km of the Wigpool Iron Mine SSSI. Therefore a full HRA report is required at planning application stage when further details are known regarding new development and will be assessed on a case by case basis.</p>  |
| Lea 3- A valued environment in which to live | <p>Safeguard existing landscape against inappropriate development.</p> <p>Encouragement of sustainable development which preserves and protects the landscape, environment and habitats.</p> | <p>Unlikely that there will be any significant effects on the European Site. All developments are required to meet the criteria of Policy LD2 to protect biodiversity and wildlife, and SD4 which seeks to ensure water quality of the SAC is not detrimentally effected.</p> | <p>River Wye (including the Lugg SAC).(6.4km away from parish)</p> <p>Wye Valley &amp; Forest of Dean Bat Sites SAC (0.3km away from parish)</p> <p>Wye Valley Woodlands SAC (9.6km away from parish)</p> | No. | <p>No, this policy aims to safeguard and sustain local habitats and biodiversity. The implementation of Core Strategy policy SD4, LD2, SD1 to grant planning permission will ensure water quality issues are addressed.</p> <p>The NDP area falls within 3km of the Wigpool Iron Mine SSSI. Therefore a full HRA report is required at planning application stage when further details are known regarding new development.</p> |
| Lea 4- Large Scale polytunnels               | <p>Appropriate poly tunnel development in Lea</p> <p>Rural business development</p> <p>Noise, odour and smell minimised.</p> <p>Unobtrusive lighting on new schemes.</p>                     | <p>Unlikely that there will be any significant effects on the European Site. All developments are required to meet the criteria of Policy LD2 to protect biodiversity and wildlife, and SD4 which seeks to ensure water quality of the SAC is not</p>                         | <p>River Wye (including the Lugg SAC).(6.4km away from parish)</p> <p>Wye Valley &amp; Forest of Dean Bat Sites SAC (0.3km away from parish)</p> <p>Wye Valley Woodlands SAC (9.6km away from</p>         | No. | <p>No, implementation of Core Strategy policy SD4, LD2, SD1 to grant planning permission will ensure water quality issues are addressed.</p> <p>The Lea NDP area falls within 3km of the Wigpool Iron Mine SSSI. Therefore a full HRA report is required at planning application stage when further details are</p>   |

|  |  |  |   |     |   |
|--|--|--|---|-----|---|
|  |  | detrimentally effected.  | parish)   |     | known regarding new Polytunnel development. This will be assessed on a case by case basis.  |
| Lea 5- Sustaining open green spaces    | <p>Sustain open green space.</p> <p>Identified green spaces safeguarded.</p> <p>Potential increase of recreation and outdoor activities.</p> <p>Beneficial to local wildlife, biodiversity, flora and fauna.</p> | Unlikely that there will be any significant effects on the European Site. All developments are required to meet the criteria of Policy LD2 to protect biodiversity and wildlife, and SD4 which seeks to ensure water quality of the SAC is not detrimentally effected. | <p>River Wye (including the Lugg SAC).(6.4km away from parish)</p> <p>Wye Valley &amp; Forest of Dean Bat Sites SAC (0.3km away from parish)</p> <p>Wye Valley Woodlands SAC (9.6km away from parish)</p> | No. | <p>No, this policy strives to retain open green spaces, this could potentially have a positive impact on the SAC sites. Implementation of Core Strategy policy SD4, LD2, SD1 to grant planning permission will ensure water quality issues are addressed.</p> <p>The Lea NDP area falls within 3km of the Wigpool Iron Mine SSSI. Therefore any developments require a full HRA report at planning application stage.</p>                       |
| Lea 6- Supporting a thriving community | <p>Encourage development of small scale employment facilities.</p> <p>Promotion of business development</p> <p>Job creation in local area</p> <p>Small increase in tourism and leisure activities.</p>           | Unlikely that there will be any significant effects on the European Site. All developments are required to meet the criteria of Policy LD2 to protect biodiversity and wildlife, and SD4 which seeks to ensure water quality of the SAC is not detrimentally effected. | <p>River Wye (including the Lugg SAC).(6.4km away from parish)</p> <p>Wye Valley &amp; Forest of Dean Bat Sites SAC (0.3km away from parish)</p> <p>Wye Valley Woodlands SAC (9.6km away from parish)</p> | No. | <p>No. The scale and extent of potential employment and community development is unlikely to have a significant impact on the SAC. Implementation of Core Strategy policy SD4, LD2, SD1 to grant planning permission will ensure water quality issues are addressed.</p> <p>The Lea NDP area falls within 3km of the Wigpool Iron Mine SSSI. Therefore a full HRA report is required at planning application stage when further details are</p> |

|   |   |  |   |     |  |
|---|---|--|---|-----|--|
|   |   |  |   |     | known regarding new development and will be assessed on a case by case basis.  |
| Lea 7- Delivery of local infrastructure | <p>Promotion of high speed broadband and mobile infrastructure.</p> <p>Support of low carbon renewable energy developments including solar, heat pumps and water power.</p>                                   | The River Wye does not flow through the parish but the neighbourhood area falls within the hydrological catchment area. Unlikely that there will be any significant effects on the European Site. All developments are required to meet the criteria of Policy LD2 to protect biodiversity and wildlife, and SD4 which seeks to ensure water quality of the SAC is not detrimentally effected. | <p>River Wye (including the Lugg SAC).(6.4km away from parish)</p> <p>Wye Valley &amp; Forest of Dean Bat Sites SAC (0.3km away from parish)</p> <p>Wye Valley Woodlands SAC (9.6km away from parish)</p> | No. | <p>No, implementation of Core Strategy policy SD4, LD2, SD1 to grant planning permission will ensure water quality issues are addressed.</p> <p>The Lea NDP area falls within 3km of the Wigpool Iron Mine SSSI. Therefore a full HRA report is required at planning application stage when further details are known regarding potential infrastructure development and will be assessed on a case by case basis.</p> |
| Lea 8- Community facilities             | <p>Support and upkeep of existing local community facilities.</p> <p>Promote new development of community facilities.</p> <p>Increase in vehicular movements.</p> <p>Increase in nonphysical disturbance.</p> | Unlikely that there will be any significant effects on the European Site. All developments are required to meet the criteria of Policy LD2 to protect biodiversity and wildlife, and SD4 which seeks to ensure water quality of the SAC is not detrimentally effected.   | <p>River Wye (including the Lugg SAC).(6.4km away from parish)</p> <p>Wye Valley &amp; Forest of Dean Bat Sites SAC (0.3km away from parish)</p> <p>Wye Valley Woodlands SAC (9.6km away from parish)</p> | No. | <p>No, implementation of Core Strategy policy SD4, LD2, SD1 to grant planning permission will ensure water quality issues are addressed.</p> <p>The Lea NDP area falls within 3km of the Wigpool Iron Mine SSSI. Therefore a full HRA report is required at planning application stage when further details are known regarding new development and will be assessed on a case by case basis.</p>                      |

# Appendix 4

## **HRA Consultation Feedback**

This consultation feedback is **only** for comments received on the HRA of the Neighbourhood Development Plan

**Parish Council Name:** Lea Parish Council

**Neighbourhood Development Plan Name:** Lea Neighbourhood Plan

**Details of consultation:** Regulation 14

**Consultation date:** 4 September to 16 October 2017

**Consultation title:** Reg 14

Consultees have made no specific comments to make on the Lea Regulation 14 HRA.

# Appendix 5

### **Appendix 3: HRA Consultation Feedback reg 16**

This consultation feedback is **only** for comments received on the HRA of the Neighbourhood Development Plan

**Parish Council Name:** Lea Parish Council

**Neighbourhood Development Plan Name:** Lea Neighbourhood Plan

**Details of consultation:** *Regulation 16*

**Consultation date:** 3 January to 14 February 2018

**Consultation title:** Regulation 16 Consultation

No comments have been made regarding the reg 16 HRA assessments.

# Appendix 6

**HRA Screening of Neighbourhood Development Plan Policies**Date undertaken: **July 2018**Core Strategy HRA version: **Adopted Core Strategy 2011-2031**

| NDP objectives and policies                  | HRA Screening of final NDP objectives and policies   |   |   |   |  |
|--|--|---|---|---|--|
|  | Likely activities (operations) to result as a consequence of the objective/option/policy   | Likely effect if option implemented. Could they have Likely Significant Effects (LSE) on European Sites?  | European Sites potentially affected   | Would it be possible that it would result in any LSE? | Requirement for an Appropriate Assessment  |
| Lea 1- The right housing in the right place. | <p>Housing sites identified.</p> <p>Promotion of achieving housing target.</p> <p>Increased vehicle traffic</p> <p>Increased demand for water abstraction and sewage treatment</p> <p>Sustainable housing growth</p> | <p>Small scale development proposed (plots of 6 or less) Unlikely that there will be any significant effects on the European Site. All developments are required to meet the criteria of LD2 to protect biodiversity and wildlife, and Policy SD4 which seeks to ensure water quality of the SAC is not detrimentally effected.</p> | <p>River Wye (including the Lugg SAC).(6.4km away from parish)</p> <p>Wye Valley &amp; Forest of Dean Bat Sites SAC (0.3km away from parish)</p> <p>Wye Valley Woodlands SAC (9.6km away from parish)</p> | No.   | <p>No, No. The scale and extent of potential housing development is unlikely to have a significant impact on the SAC. Implementation of Core Strategy policy SD4, LD2, SD1 to grant planning permission will ensure water quality issues are addressed.</p> <p>The Lea NDP area falls within 3km of the Wigpool Iron Mine SSSI. Therefore a full HRA report is required at planning application stage when further details are known regarding new housing development and will be assessed on a case by case basis.</p> |
| Lea 2-Surface and foul water drainage        | <p>Strive to reduce impact of flooding within Lea.</p> <p>New development designed to appropriately reduce flood</p>   | <p>Unlikely that there will be any significant effects on the European Site. This policy strives to alleviate</p>   | <p>River Wye (including the Lugg SAC).(6.4km away from parish)</p> <p>Wye Valley &amp; Forest of</p>  | No.   | <p>No, implementation of Core Strategy policy SD4, LD2, SD1 to grant planning permission will ensure water quality issues are addressed.</p>   |

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|--|--|---|---|-----|---|
|  | <p>risk.</p> <p>Sustainable design promoted.</p> <p>Infrastructure development phased in line with infrastructure works within the plan period.</p>  | <p>flooding within the Parish. All developments are required to meet the criteria of Policy LD2 to protect biodiversity and wildlife, and SD4 which seeks to ensure water quality of the SAC is not detrimentally effected.</p>   | <p>Dean Bat Sites SAC (0.3km away from parish)</p> <p>Wye Valley Woodlands SAC (9.6km away from parish)</p>   |     | <p>The Lea NDP area falls within 3km of the Wigpool Iron Mine SSSI. Therefore a full HRA report is required at planning application stage when further details are known regarding new development and will be assessed on a case by case basis.</p>  |
| Lea 3- A valued environment in which to live | <p>Safeguard existing landscape against inappropriate development.</p> <p>Encouragement of sustainable development which preserves and protects the landscape, environment and habitats.</p> | <p>Unlikely that there will be any significant effects on the European Site. All developments are required to meet the criteria of Policy LD2 to protect biodiversity and wildlife, and SD4 which seeks to ensure water quality of the SAC is not detrimentally effected.</p> | <p>River Wye (including the Lugg SAC).(6.4km away from parish)</p> <p>Wye Valley &amp; Forest of Dean Bat Sites SAC (0.3km away from parish)</p> <p>Wye Valley Woodlands SAC (9.6km away from parish)</p> | No. | <p>No, this policy aims to safeguard and sustain local habitats and biodiversity. The implementation of Core Strategy policy SD4, LD2, SD1 to grant planning permission will ensure water quality issues are addressed.</p> <p>The NDP area falls within 3km of the Wigpool Iron Mine SSSI. Therefore a full HRA report is required at planning application stage when further details are known regarding new development.</p> |
| Lea 4- Large Scale polytunnels               | <p>Appropriate poly tunnel development in Lea</p> <p>Rural business development</p> <p>Noise, odour and smell minimised.</p> <p>Unobtrusive lighting on new schemes.</p>                     | <p>Unlikely that there will be any significant effects on the European Site. All developments are required to meet the criteria of Policy LD2 to protect biodiversity and wildlife, and SD4 which seeks to ensure water quality of the SAC is not</p>                         | <p>River Wye (including the Lugg SAC).(6.4km away from parish)</p> <p>Wye Valley &amp; Forest of Dean Bat Sites SAC (0.3km away from parish)</p> <p>Wye Valley Woodlands SAC (9.6km away from</p>         | No. | <p>No, implementation of Core Strategy policy SD4, LD2, SD1 to grant planning permission will ensure water quality issues are addressed.</p> <p>The Lea NDP area falls within 3km of the Wigpool Iron Mine SSSI. Therefore a full HRA report is required at planning application stage when further details are</p>   |

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|  |  | detrimentally effected.  | parish)   |     | known regarding new Polytunnel development. This will be assessed on a case by case basis.  |
| Lea 5- Sustaining open green spaces    | <p>Sustain open green space.</p> <p>Identified green spaces safeguarded.</p> <p>Potential increase of recreation and outdoor activities.</p> <p>Beneficial to local wildlife, biodiversity, flora and fauna.</p> | Unlikely that there will be any significant effects on the European Site. All developments are required to meet the criteria of Policy LD2 to protect biodiversity and wildlife, and SD4 which seeks to ensure water quality of the SAC is not detrimentally effected. | <p>River Wye (including the Lugg SAC).(6.4km away from parish)</p> <p>Wye Valley &amp; Forest of Dean Bat Sites SAC (0.3km away from parish)</p> <p>Wye Valley Woodlands SAC (9.6km away from parish)</p> | No. | <p>No, this policy strives to retain open green spaces, this could potentially have a positive impact on the SAC sites. Implementation of Core Strategy policy SD4, LD2, SD1 to grant planning permission will ensure water quality issues are addressed.</p> <p>The Lea NDP area falls within 3km of the Wigpool Iron Mine SSSI. Therefore any developments require a full HRA report at planning application stage.</p>                       |
| Lea 6- Supporting a thriving community | <p>Encourage development of small scale employment facilities.</p> <p>Promotion of business development</p> <p>Job creation in local area</p> <p>Small increase in tourism and leisure activities.</p>           | Unlikely that there will be any significant effects on the European Site. All developments are required to meet the criteria of Policy LD2 to protect biodiversity and wildlife, and SD4 which seeks to ensure water quality of the SAC is not detrimentally effected. | <p>River Wye (including the Lugg SAC).(6.4km away from parish)</p> <p>Wye Valley &amp; Forest of Dean Bat Sites SAC (0.3km away from parish)</p> <p>Wye Valley Woodlands SAC (9.6km away from parish)</p> | No. | <p>No. The scale and extent of potential employment and community development is unlikely to have a significant impact on the SAC. Implementation of Core Strategy policy SD4, LD2, SD1 to grant planning permission will ensure water quality issues are addressed.</p> <p>The Lea NDP area falls within 3km of the Wigpool Iron Mine SSSI. Therefore a full HRA report is required at planning application stage when further details are</p> |

|   |   |  |   |     |  |
|---|---|--|---|-----|--|
|   |   |  |   |     | known regarding new development and will be assessed on a case by case basis.  |
| Lea 7- Delivery of local infrastructure | <p>Promotion of high speed broadband and mobile infrastructure.</p> <p>Support of low carbon renewable energy developments including solar, heat pumps and water power.</p>                                   | The River Wye does not flow through the parish but the neighbourhood area falls within the hydrological catchment area. Unlikely that there will be any significant effects on the European Site. All developments are required to meet the criteria of Policy LD2 to protect biodiversity and wildlife, and SD4 which seeks to ensure water quality of the SAC is not detrimentally effected. | <p>River Wye (including the Lugg SAC).(6.4km away from parish)</p> <p>Wye Valley &amp; Forest of Dean Bat Sites SAC (0.3km away from parish)</p> <p>Wye Valley Woodlands SAC (9.6km away from parish)</p> | No. | <p>No, implementation of Core Strategy policy SD4, LD2, SD1 to grant planning permission will ensure water quality issues are addressed.</p> <p>The Lea NDP area falls within 3km of the Wigpool Iron Mine SSSI. Therefore a full HRA report is required at planning application stage when further details are known regarding potential infrastructure development and will be assessed on a case by case basis.</p> |
| Lea 8- Community facilities             | <p>Support and upkeep of existing local community facilities.</p> <p>Promote new development of community facilities.</p> <p>Increase in vehicular movements.</p> <p>Increase in nonphysical disturbance.</p> | Unlikely that there will be any significant effects on the European Site. All developments are required to meet the criteria of Policy LD2 to protect biodiversity and wildlife, and SD4 which seeks to ensure water quality of the SAC is not detrimentally effected.   | <p>River Wye (including the Lugg SAC).(6.4km away from parish)</p> <p>Wye Valley &amp; Forest of Dean Bat Sites SAC (0.3km away from parish)</p> <p>Wye Valley Woodlands SAC (9.6km away from parish)</p> | No. | <p>No, implementation of Core Strategy policy SD4, LD2, SD1 to grant planning permission will ensure water quality issues are addressed.</p> <p>The Lea NDP area falls within 3km of the Wigpool Iron Mine SSSI. Therefore a full HRA report is required at planning application stage when further details are known regarding new development and will be assessed on a case by case basis.</p>                      |

# Appendix 7

## HRA Screening of final Neighbourhood Development Plan Policies

Date undertaken: **December 2018**

Core Strategy HRA version: **Adopted Core Strategy 2011-2031**

| NDP objectives and policies                  | HRA Screening of final NDP objectives and policies   |   |   |   |   |
|--|--|---|---|---|---|
|  | Likely activities (operations) to result as a consequence of the objective/option/policy   | Likely effect if option implemented. Could they have Likely Significant Effects (LSE) on European Sites?  | European Sites potentially affected   | Would it be possible that it would result in any LSE? | Requirement for an Appropriate Assessment   |
| Lea 3- A valued environment in which to live | <p>Safeguard existing landscape against inappropriate development.</p> <p>Encouragement of sustainable development which preserves and protects the landscape, environment and habitats.</p> | <p>Unlikely that there will be any significant effects on the European Site. All developments are required to meet the criteria of Policy LD2 to protect biodiversity and wildlife, and SD4 which seeks to ensure water quality of the SAC is not detrimentally effected.</p> | <p>River Wye (including the Lugg SAC).(6.4km away from parish)</p> <p>Wye Valley &amp; Forest of Dean Bat Sites SAC (0.3km away from parish)</p> <p>Wye Valley Woodlands SAC (9.6km away from parish)</p> | No.   | <p>No, this policy aims to safeguard and sustain local habitats and biodiversity. The implementation of Core Strategy policy SD4, LD2, SD1 to grant planning permission will ensure water quality issues are addressed.</p> <p>The NDP area falls within 3km of the Wigpool Iron Mine SSSI. Therefore a full HRA report is required at planning application stage when further details are known regarding new development.</p> <p>Changes to this policy post examination clarify and enhances and makes the policy more flexible. This policy specifies further protection for bats by maintaining and sustaining green infrastructure.</p> |
| Lea 4- Sustaining open green spaces          | <p>Sustain open green space.</p> <p>Identified green spaces safeguarded.</p> <p>Potential increase of recreation and outdoor activities.</p> <p>Beneficial to local wildlife,</p>            | <p>Unlikely that there will be any significant effects on the European Site. All developments are required to meet the criteria of Policy LD2 to protect biodiversity and wildlife, and SD4 which seeks to ensure water</p>   | <p>River Wye (including the Lugg SAC).(6.4km away from parish)</p> <p>Wye Valley &amp; Forest of Dean Bat Sites SAC (0.3km away</p>   | No.   | <p>No, this policy strives to retain open green spaces, this could potentially have a positive impact on the SAC sites. Implementation of Core Strategy policy SD4, LD2, SD1 to grant planning permission will ensure water quality issues are addressed.</p>   |

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|  | biodiversity, flora and fauna.  | quality of the SAC is not detrimentally effected.  | from parish)<br>Wye Valley Woodlands SAC (9.6km away from parish)  |     | The Lea NDP area falls within 3km of the Wigpool Iron Mine SSSI. Therefore any developments require a full HRA report at planning application stage.<br><br>Changes to this policy post examination clarifies the policy, changes does not change the earlier conclusion that an AA is not required.   |
| Lea 5- Supporting a thriving community | Encourage development of small scale employment facilities.<br><br>Promotion of business development<br><br>Job creation in local area<br><br>Small increase in tourism and leisure activities. | Unlikely that there will be any significant effects on the European Site. All developments are required to meet the criteria of Policy LD2 to protect biodiversity and wildlife, and SD4 which seeks to ensure water quality of the SAC is not detrimentally effected. | River Wye (including the Lugg SAC).(6.4km away from parish)<br><br>Wye Valley & Forest of Dean Bat Sites SAC (0.3km away from parish)<br><br>Wye Valley Woodlands SAC (9.6km away from parish) | No. | No. The scale and extent of potential employment and community development is unlikely to have a significant impact on the SAC. Implementation of Core Strategy policy SD4, LD2, SD1 to grant planning permission will ensure water quality issues are addressed.<br><br>The Lea NDP area falls within 3km of the Wigpool Iron Mine SSSI. Therefore a full HRA report is required at planning application stage when further details are known regarding new development and will be assessed on a case by case basis.<br><br>Changes to this policy post examination clarifies the policy to ensure the plan contributes to sustainable development. The modifications do not change the earlier conclusion that an AA is not required. |

# Appendix 8

Lea Table of Examiner's Modifications

| Policy  | Modification recommended  | Justification   |
|---|---|---|
| Introduction                                  | <p>Reword the second paragraph on page 1 of the Plan to read:</p> <p>“Such NDPs allow a ‘local say’ in terms of future development proposals in the area, but the plan must <i>generally</i> conform to the <i>strategic policies</i> in the <i>development plan at local authority level</i> and <i>have regard to</i> the National Planning Policy Framework (NPPF).”</p> <p>Reword the third paragraph on page 1 of the Plan to read:</p> <p>“Once the plan has been made, following a favourable referendum, <i>the</i> Lea Neighbourhood Development Plan will have force of law and <i>will become part of the development plan</i>. <i>As such it will be used by those making decisions on planning applications</i> for deciding what development should and should not take place in the parish.”</p> | Interests of accuracy and clarity updating information.   |
| Section 7                                     | <p>Change “Local Development Framework” in the third paragraph on page 20 of the Plan to “<i>planning policy context</i>”</p> <p>Update the housing figures in paragraph six on page 20 of the Plan replacing “...290 properties in 2011...” with “307 properties in 2014...”</p>   | Interests of accuracy and clarity.  |
| Policy Lea 1- Housing in the right place      | <p>Delete the first bullet point of the policy in its entirety</p> <p>Delete the words “Further applications for” from the (existing) second bullet point of the policy which should begin “New housing development...” Add at the beginning of the (existing) third bullet point of the policy: “<i>A settlement boundary for Lea has been defined and is shown on page [21] of the Plan.</i> [retain all of existing criterion] Delete “as specified in the NPPF” from (existing) bullet point 13 of the policy. Delete (existing) bullet point 15 of the policy in its entirety.</p>   | <p>Interests of accuracy and clarity. Clarification of the text and to add more detail/certainty.</p> <p>Change to meet basic conditions.</p> |
| Policy Lea 2- Surface and foul water drainage | Change “settled farmlands” on page 28 of the Plan to “ <i>Principal Settled Farmlands</i> ”   | Interests of accuracy and clarity. In line with the NPPF.   |

Lea Table of Examiner's Modifications

|  |   |   |
|--|---|---|
| <p>Policy Lea 3-<br/>A valued environment in which to live</p> | <p>Replace Appendix D of the Plan with the map and accompanying photographs of the views to be protected sent in response to my questions of clarification. Ensure that all the viewpoints referred to in the photographs are mapped on the map.</p> <p>Reword the second bullet point to read:</p> <p>“Development must protect or enhance <i>the key features of the panoramic views identified in Appendix D and the area’s landscape quality.</i>”</p> <p>Reword the third bullet point to read:</p> <p>“Development must conserve mature trees and hedgerows <i>wherever possible and appropriate to do so</i>, incorporating these features into a landscaping scheme.”</p> <p>Reword the sixth bullet point to read:</p> <p>“<i>New development should sustain local habitats and support biodiversity. The creation and maintenance of green infrastructure is particularly encouraged as it is important for bats.</i>”</p> <p>Delete the seventh bullet point in its entirety</p> | <p>Interests of accuracy and clarity.</p> <p>Ensure policy is more flexible and ensure the policy will not prevent the achievement of sustainable development.</p>                      |
| <p>Policy Lea 4-<br/>Large scale polytunnels</p>               | <p>Delete Policy Lea 4 in its entirety</p> <p>Add the words: “<i>A new document was produced by Herefordshire Council in June 2018 called ‘Polytunnels Planning Guide’. This guide will provide invaluable planning advice and is a material consideration in the determination of planning applications.</i>”</p>  | <p>Policy does not meet the basic conditions. Requires further justification and explanation.</p>   |
| <p>Policy Lea 5-<br/>Sustaining open green spaces</p>          | <p>Amend the Policies Map and map on page 36 of the Plan to exclude the Village Hall and car park from the Local Green Space designation.</p> <p>Change the first bullet point of the policy to read: “<i>The five areas listed below and shown on the map are designated as Local Green Spaces. Within the Local Green Spaces any new development will be managed in line with national policy on green belts.</i>”</p> <p>Delete bullet point two of the policy in its entirety.</p> <p>Delete bullet point three of the policy in its entirety.</p> <p>Delete bullet point four of the policy in its entirety.</p>   | <p>Interests of accuracy and clarity.</p> <p>Removal of repetition.</p> <p>Ensure policy provides a practical framework.</p> <p>Improve conformity with the NPPF and Core Strategy.</p> |
| <p>Policy Lea 6-<br/>Supporting a thriving rural economy</p>   | <p>Remove bullet point one from the policy and add it to the supporting text as a new paragraph.</p> <p>Delete bullet point three of the policy in its entirety.</p> <p>Combine bullet points four and five to read: “<i>Conversion of existing buildings to employment uses will be supported where the impact on the local environment is acceptable. Sustainable tourism opportunities including the provision of sensitively located small-scale B and B or self catering tourist accommodation will be</i></p>   | <p>Interests of accuracy and clarity.</p> <p>Help achieve sustainable development.</p> <p>Removal of superfluous information.</p>   |

Lea Table of Examiner's Modifications

|            |  |  |
|------------|--|--|
|            | <p><i>encouraged.</i>"</p> <p>Reword bullet point six to read: "<i>In considering any development proposals, the impact on the landscape and historic environment of the area, flooding and drainage, access and highway safety, ecology and residential amenity must be acceptable.</i>"</p> <p>Delete bullet point seven of the policy in its entirety</p> | <p>Improve conformity with the NPPF and Core Strategy.</p> |
| Appendix A | <p>Add to Appendix A: "<i>Readers are encouraged to seek the most up to date list of heritage assets and information about listed buildings in the Parish from Historic England or the local planning authority.</i>"</p>  | <p>Interests of accuracy and clarity.</p>                  |
| Glossary   | <p>Change "(SSI)" on page 64 of the Plan to "(SSSI)"</p>   | <p>Interests of accuracy.</p>                              |