

Habitats Regulations Assessment

Regulation 16 Report for:

Whitchurch & Ganarew Group Neighbourhood Area
January 2019



Whitchurch and Ganarew HRA

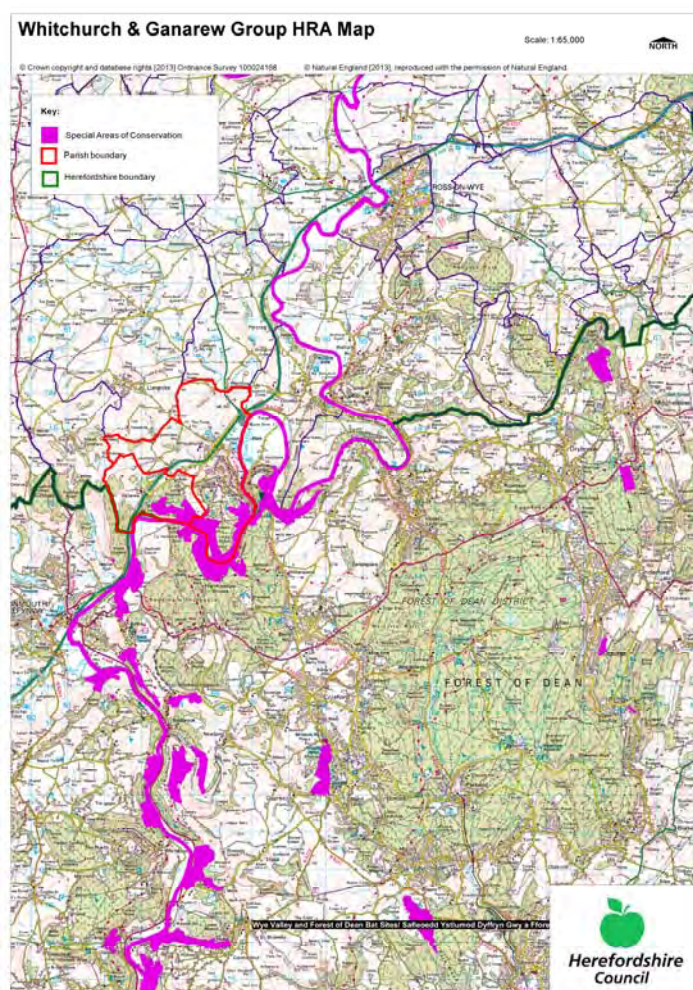
HRA Screening Assessment

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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 Draft Neighbourhood Plan is likely to have a significant effect on any European site(s).
- 1.2 Whitchurch and Ganarew Group Parish Council is producing a Neighbourhood Development Plan for Whitchurch and Ganarew Group Parish, in order to set out the vision, objectives and policies for the development of the Parish up to 2031. This HRA reviews the Draft Whitchurch and Ganarew Group Plan January 2019.
- 1.3 The NDP is a mix of criteria based policies and has allocated a site within the designated settlement boundary of Whitchurch and has three committed sites within this boundary as well. The plan has allocated a settlement boundary for Symonds Yat West. It also provides general policies that clarify and provide detail to the policies within the Herefordshire Core Strategy therefore it requires a high level screening assessment to build upon the HRA Screening Assessment Report for the Herefordshire Core Strategy. This high level screening assessment should be read in combination with the Herefordshire publication of the Local Plan-Core Strategy Habitat Regulations Assessment Report (October 2013) and ensures that there will not be any significant impacts upon Natura 2000 sites.
- 1.4 The map below shows Whitchurch and Ganarew Neighbourhood Area with the European Site highlighted.



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, Whitchurch and Ganarew 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 October 2013 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 (March 2018) and reviewed in terms of the implications of *Sweetman*.

3 Methodology

- 3.1 As the Whitchurch and Ganarew Group Plan is not directly connected with the management of any European sites, and includes proposals for development which may affect European sites, 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 options

- 4.1 The initial Screening report (October 2013) found that the Whitchurch and Ganarew Parish is 9.1 km from the Wye Valley and Forest of Dean Bat Sites. The Whitchurch and Ganarew Group NDP area falls within the hydrological catchment area of the River Wye (including the Lugg) SAC. The River Wye SAC is located south and east of the Neighbourhood Area and therefore a full screening assessment is required. The area also falls within the Wye Valley Woodlands.
- 4.2 For full details of the Wye Valley Woodlands, Wye Valley Forest of Dean Bat sites and the River Wye (including the Lugg) SAC attributes which contribute to and define their integrity and vulnerable data see Appendix 1 of the Whitchurch and Ganarew Plan Initial Screening Report. The Initial Screening Report, October 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 Whitchurch and Ganarew Plan Group Neighbourhood Plan may affect site integrity.
- 4.3 The 4 general approach options for the NDP were assessed to determine their environmental impact that could affect the Wye Valley Woodlands, Wye Valley Forest of Dean Bat sites and the River Wye (including the Lugg) SACs. Overall the majority of the options proposing any growth appear to depend on location and scale in relation to environmental impact. There are 7 site options, 24 policies and 5 objectives which have been screened to assess the impact on the three identified SACs. Five of the site options listed are all on a small scale and located away from the SACs and are unlikely to have a significant impact on the SACs. Two of the sites 4 and 9, although deemed to be a very small scale, the proximity of the sites to the River Wye was likely to have an effect on the River Wye SAC.
- 4.4 As the Whitchurch and Ganarew Group Plan progressed from options onto their NDP policies, the Plan needed to identify ways in which the least effect on the Wye Valley Woodlands, Wye Valley Forest of Dean Bat sites and the River Wye (including the Lugg) SACs could be achieved, alongside taking forward the preferred options from the consultation from the community. If the majority of these options are taken forward either as standalone policies or in combination with other policies then the

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.

- 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. DCWW states there is limited capacity at Goodrich waste water treatment works within in the neighbourhood area. Therefore new development will need to adhere to the provisions of Policy SD4 of the Core Strategy. DCWW have not commented at regulation 14 regarding potential works required. In Water Cycle Study addendum it states that the Growth can potentially be accepted within permit flow limit. High STW flows were recorded 2011 & 2012 (potentially data issue) so only 2013 flow used in assessment. Future flow should be assessed to confirm if headroom available. It is recommended that liaison with the Water Company is needed before significant growth.
- 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 Whitchurch and Ganarew Initial Screening Report. The Initial Screening Report, October 2013, 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 Whitchurch and Ganarew 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 Whitchurch and Ganarew 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 Whitchurch and Ganarew Initial Screening Report. The Initial Screening Report, October 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 Whitchurch and Ganarew Neighbourhood Plan may affect site integrity.
- 4.15 The initial screening assessment indicated that a full screening assessment is required to assess the likelihood of significant effects on the Wye Valley and Forest of Dean Bat Sites of the policies within the Whitchurch and Ganarew 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 Whitchurch and Ganarew Plan Initial Screening Report. The Initial Screening Report, October 2013, can be found in Appendix 1 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 Whitchurch and Ganarew 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.
- 4.17 As the Whitchurch and Ganarew Plan progresses from options onto their NDP policies, the Plan will need to identify ways in which the Whitchurch and Ganarew NDP 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 2.

5 Description of the Whitchurch and Ganarew Plan Neighbourhood Plan

- 5.1 The Draft Whitchurch and Ganarew Plan presents detailed policies for development in the Neighbourhood Area, which is equivalent to the parish boundary, up to 2031. The first part of the Plan introduces the Plan and its preparation and discusses the background to each of the villages.
- 5.2 The NDP then details the vision for the Group Parish over the Plan period and six objectives of how this will be achieved. The five objectives cover the following topics:

Housing

Opportunities for Employment

Environmental Sustainability

Roads and Traffic

Community Service and Facilities

5.3 The NDP also sets out 24 policies on various topics based on the objective headings above and also for the village, these include:

- Policy WG1 Promoting Sustainable Development
- Policy WG2 Development Strategy
- Policy WG3 Housing Development in Whitchurch
- Policy WG4 Housing Sites in Whitchurch
- Policy WG5 Housing Development in Symonds Yat West
- Policy WG6 Affordable and intermediate Homes
- Policy WG7 Housing Design and Appearance
- Policy WG8 Sustainable design
- Policy WG9 Land adjacent to the River Wye to the east of Whitchurch
- Policy WG10 Stoney Hills Industrial Estate and the complex of industrial and commercial buildings between the Old Ross Road and The Old Forge
- Policy WG11 Use of Rural Buildings
- Policy WG12 Working from Home
- Policy WG13 Poly-tunnel Policy
- Policy WG14 Conserving the landscape and scenic beauty, both within and outside the Wye Valley AONB
- Policy WG15 Enhancement of the natural environment
- Policy WG16 Protecting heritage assets
- Policy WG17 Protection from flood risk
- Policy WG18 Sewerage infrastructure
- Policy WG19 Renewable and low carbon energy
- Policy WG20 Traffic measures within the parish
- Policy WG21 Highway design requirements
- Policy WG22 Protection and enhancement of Parish facilities and services
- Policy WG23 Contributions to Parish Services, youth provision and recreation facilities
- Policy WG24 Broadband infrastructure

5.4 The NDP proposes that the following sites in Whitchurch to be allocated for housing, in order to facilitate the proportional growth envisaged by Policy RA2 of the Local Plan (Core Strategy):

Site opposite Yew Tree Close

Total capacity of 9 dwellings.

6 Assessments undertaken to date of the emerging Whitchurch and Ganarew 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 Whitchurch and Ganarew NDP would be likely to have a significant effect on the River Wye SAC, Wye Valleys Woodlands SAC and Wye Valley and Forest of Dean bat sites. This has been repeated at each statutory stage of the NDP consultation process.

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 Whitchurch and Ganarew NDP objectives and policies (January 2019) were concluded to be likely to have a significant effect on the European sites. The group parish itself does not have the River Wye SAC in the parish, however it is in the

hydrological catchment and the river runs along its southern boundary. The settlement of Whitchurch and Ganarew and site allocation is not in close proximity to the river and unlikely to have a direct significant impact on the SAC. Core Strategy policy SD3 and SD4 together with the Nutrient Management Plan will ensure that development can only occur if these 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 Whitchurch and Ganarew 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 Market Area in the Herefordshire Core Strategy.
- 6.7 Therefore it was concluded that the **Submission Whitchurch and Ganarew NDP would not have a likely significant effect on the River Wye (including the River Lugg) SAC, Wye Valley Woodlands and Wye Valley and Forest of Dean Bat sites SAC.**

Screening of modifications to NDP (Reg16)

- 6.8 The Submission NDP (January 2019) incorporates additional policy criteria or wording to add clarity and emphasis throughout the document. Policy which was amended and identified community areas to protect. Policy WG18 reference to the sewerage network capacity within the village and the potential to phase development. This will give criteria for future applications to meet to support policy SD4 and ensure that the delivery of the Nutrient Management Plan is not compromised.
- 6.9 Modifications made to 3 other policies of the plan are considered to be minor and would not have a significant effect on the results previously assessed. These were points of clarity and minor word changes.
- 6.10 The revised NDP policies are therefore unlikely to result in significant effects on the European site. 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.

7 **Assessment of the 'likely significant effects' of the submission Whitchurch and Ganarew NDP following regulation 14 (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 SAC at this final screening stage. Any likely significant effects would require an Appropriate Assessment to be required.

7 Assessment of the 'likely significant effects' of the Whitchurch and Ganarew Plan NDP

7.1 As required under Regulation 102 of the Habitats Regulations 2010, a screening assessment has been undertaken to identify the 'likely significant effects' of the NDP. A screening matrix was prepared in order to identify whether any of the policies in the Plan would be likely to have a significant effect on the River Wye SAC.

7.2 The findings of the screening matrix can be found in the Screening Matrix in Appendix 3 of this report. 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 The Screening matrix took the approach of screening each policy individually, which is consistent with current guidance documents. The results from the HRA report for the submission version of the Herefordshire Core Strategy were also taking into consideration.

8 Conclusions from the Screening Matrix

8.1 None of the Draft Whitchurch and Ganarew Plan (March 2018) policies and sites were concluded to be likely to have a significant effect on the Wye Valley Woodlands SAC, Wye Valley Forest of Dean Bat sites SAC and the River Wye (including the Lugg) SAC.

8.2 This is partly down to scale and extent of plan also the Whitchurch and Ganarew Plan small scale site allocations. 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 plan allocates settlement boundaries for Whitchurch and Symonds Yat West and 1 site for development within the settlement Whitchurch to accommodate 9 dwellings. Within the settlement area there appears to be enough capacity within the two identified settlements along with the completions and commitments to meet the target housing growth.

8.4 The initial Call for Sites had 33 dwellings throughout 2016 and 2017, these were eventually whittled down to 7 options. These options have been screened in the HRA options screening and have found 2 out of the seven likely to have an effect and the 5 site unlikely to have an effect on the SACs.

8.5 The one sites for development of up to 9 dwellings, along with development from 41 commitments, 25 completions this already meets the housing target of 65 from 2011 to 2031. Commitments and completions from April 2011-April 2018 are currently 66 dwellings, leaving a residual figure of -1 to find within the parish of Whitchurch and Ganarew.

8.5 There is limited capacity at Goodrich waste water treatment works within in the neighbourhood area. Therefore new development will need to adhere to the

provisions of Policy SD4 of the Core Strategy. In Water Cycle Study addendum it states that the Growth can potentially be accepted within permit flow limit. It is recommended that liaison with the Water Company is needed before significant growth takes place.

- 8.6 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.
- 8.7 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.
- 8.8 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.
- 8.9 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. Whitchurch and Ganarew NDP allocates sites, however the location and scale of the sites have been screened and seen to have an unlikely significant effect on the Wye Valley and Forest of Dean SAC along with the Wye Valley Woodlands SAC. Therefore 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. The sites likely impact on the SACs can be determined further at planning application stage when further details of the proposed housing schemes are known.
- 8.10 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 SAC. ***It is therefore concluded that the Whitchurch and Ganarew Neighbourhood Plan will not have a likely significant effect on the River Wye SAC, Wye Valley Woodland SAC and Wye Valley and Forest of Dean Bat site SACs.***

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 Llangarron, Welsh Newton and Llanrothal and Whitchurch and Ganarew both and are in the process of producing a neighbourhood plan. These plans have not gone over and beyond the requirements set out within the Core Strategy for their area. Marstow are not doing a NDP. The Parish borders with Gloucestershire and Monmouthshire, no known NDPs are bordering the Parish for these areas.

- 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 Whitchurch and Ganarew Neighbourhood 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 is also not considered to affect the previous findings.
- 10.2 Therefore the earlier conclusions that the **Whitchurch and Ganarew NDP will not have a likely significant effect on the River Wye SAC, Wye Valley Woodlands and Wye Valley and forest of Dean Bat sites SAC** remains valid.

11.0 Next steps

- 11.1 This submission Report will be published alongside the final Whitchurch and Ganarew NDP and the earlier HRA Report and its addendum. This will be subject to a undergo a six week consultation with the statutory bodies prior to being sent to examination.

Appendix 1

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)

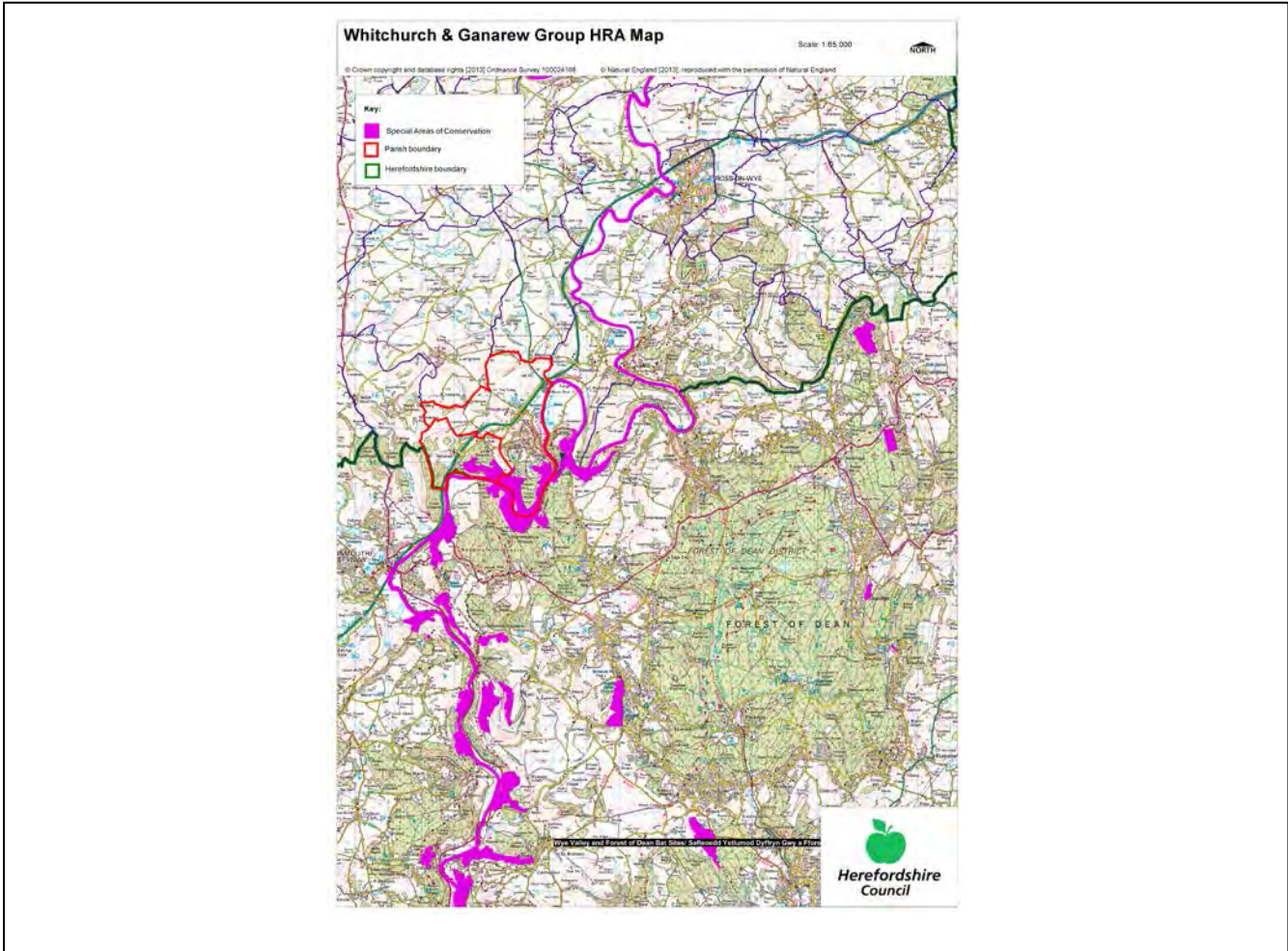
Neighbourhood Area:	Whitchurch & Ganarew Group Neighbourhood Area
Parish Council:	Whitchurch & Ganarew Group Parish Council
Neighbourhood Area Designation Date:	04/12/13

Introduction

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

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

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



Initial HRA Screening

River Wye (including the River Lugg) SAC:

Does the Neighbourhood Area have the River Wye (including the River Lugg) in or next to its boundary?	Y	The River Wye SAC runs along the borders of the Group Parish
Is the Neighbourhood Area in the hydrological catchment of the River Wye (including the River Lugg) SAC?	Y	The Group 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 Group Parish

Downton Gorge SAC:

Is the Neighbourhood Area within 10km of Downton Gorge SAC?	N	Downton Gorge is 54.8km away from the Group Parish
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River Clun SAC:

Does the Neighbourhood Area include: Border Group Parish Council or Leintwardine Group Parish Council?	N	River Clun does not border the Group Parish
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Usk Bat Sites SAC:

Is the Neighbourhood Area within 10km of the SAC boundary?	N	Usk Bat Sites are 31.8km away from the Group Parish
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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 9.1 km away from the Group Parish
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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 within the Group Parish
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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 Whitchurch & Ganarew Group 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 Whitchurch & Ganarew Group Neighbourhood Area and would need to be taken into account within a Strategic Environmental Assessment. In addition, the NDP will also need to consider the other SEA topics set out in Guidance Note 9a to ensure that the plan does not cause adverse impacts.

SEA features	Total	Explanation	SEA required
Air Quality Management Areas	0	There are no AQMAs within the Group Parish	N
Ancient Woodland	14	Trebandy Wood (border); Thomas Wood (border); Park Wood (border); Coldwell Wood (border); Huntsham Hill Wood (border); Elliots Wood (border); Collins Grove (border); Woodside Wood; Long Close Wood; Goldsmiths Wood; Morgan Grove; Hazel Wood (border); St Wolstans Wood (border); Trewarne Wood	Y
Areas of Archaeological Interest	0	There are no AAls within the Group Parish	N
Areas of Outstanding Natural Beauty	1	Part of the Group Parish is within the Wye Valley AONB	Y
Conservation Areas	0	There are no Conservation Areas within the Group Parish	N
European Sites	2	River Wye; Wye Valley Woodlands	Y
Flood Areas		Flood Zones 2 and 3 follow the River Wye and some streams off the river	Y
Listed Buildings	Numerous	There are numerous Listed Buildings throughout the Group Parish	Y
Local Sites (SWS/SINCS/RIGS)	5 (RIGS) 4 (SWS)	RIGS: Little Doward Hillside; Limestone Pavement, Little Doward; King Arthurs Caves: Lords Wood Quarry (border); Quarry north of King Arthurs Cave (border) SWS: River Wye; The Doward and Huntsham Hill; Woodland at Welsh Newton and Callow Hill (border); Garron Brook	Y
Long distance footpaths/trails	1	Wye Valley Walk	Y
Mineral Reserves	5	West of Wye, east of Rockview Farm; Great Doward, Little Doward including Lords Wood; In bend of River Wye, north of Huntsham Court and Huntsham Hill (border); South of Symonds Yat (border); East of Symonds Yat, on opposite bank of River Wye (border)	Y
National Nature Reserve	1	Lady Park Wood (border)	Y
Registered & Unregistered parks and gardens	3 Unregistered	Wyastone Leys; Sellarsbrooke Park; Huntsham Court (border)	Y
Scheduled Ancient Monuments	5	Churchyard cross at St Swithins Churchyard; Little Doward Camp; King Arthurs Cave, Great Doward; Merlin's Cave, Great Doward; Churchyard cross	Y

		in St Dubricius Churchyard	
Sites of Special Scientific Interest	3	River Wye (Unfavourable Recovering); Upper Wye Gorge (Favourable (part) Unfavourable Recovering (part)); Great Doward (Unfavourable Recovering)	Y

Decision Notification:

The initial screening highlights that the Neighbourhood Development Plan for the Whitchurch & Ganarew Group Neighbourhood Area:

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

Assessment date: 22/10/2013

Assessed by: James Latham

Appendix 1: European Sites

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

Downton Gorge
Site Features: <i>Tilio-Acerion</i> forests of slopes, screes and ravines
Vulnerability data: 10km for air quality associated with poultry units or other intensive agricultural practices.
River Clun
Site Features: Freshwater pearl mussel <i>Margaritifera margaritifera</i>
Vulnerability data: Water quality is important to maintain the site feature. Parishes either side of the River Clun will be affected.
River Wye
Site Features: 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>
Vulnerability data: 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. 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. 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. 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. 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." (Source: EA website: http://www.environmentagency.gov.uk/static/documents/Business/Otters_the_facts.pdf 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.

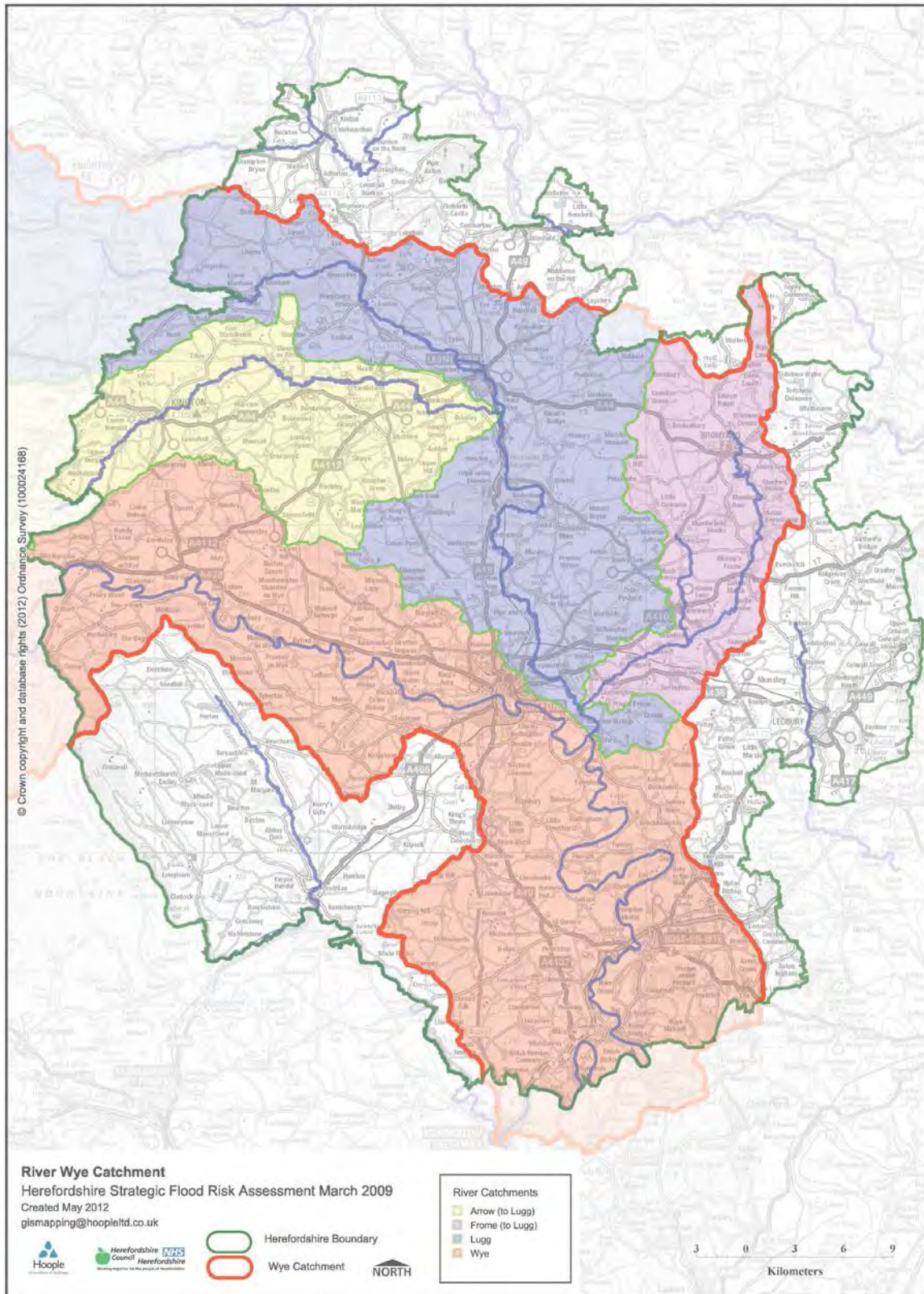
Greater Horseshoe Bat: Large buildings, pasture, edge of mixed deciduous woodland and hedgerows. Mixed land-use especially south-facing slopes, favours beetles, moths and insects they feed on. During the winter they depend on caves, abandoned mines and other underground sites for undisturbed hibernation.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

Whitchurch and Ganarew Group Options

Option1-Not to prepare a Neighbourhood Plan but to rely on Herefordshire's Core Strategy, accept pressures from housing developers and any Rural Areas Local Plan that Herefordshire Council might produce.

Option 2- Limiting housing growth to that needed to meet the Herefordshire Local Plan Core Strategy requirements to sites already committed and sensitive infilling within defined settlement boundaries for Whitchurch and Symonds Yat West.

Option 3-In addition to Option 2, identifying a number of small sites (i.e. sites of up to 5 - 10 dwellings) that would be in keeping with the scale of development for the settlement boundary of Whitchurch.

Option 4- In addition to Option 2, identifying a mix of very small, small and medium-sized sites in Whitchurch that would be in keeping with the scale of development for the settlement boundary of Whitchurch and that would provide up to 65 new dwellings.

Site Options

Site option 4-Pump house Washings Lane 0.1ha

Site option 6-Ridgeway Crescent 0.03ha

Site option 19- Erwarton, Washings Lane 0.04ha

Site option 24-Old Court Barns 0.4ha SELECTED

Site option 31b- Llangrove Road 2.0ha SELECTED

Site option 32-Old Court hotel 0.05ha

Site option 33- Old Bakery Old Monmouth Road 0.2ha

Appendix 3

Table 1: HRA rescreening of amended Neighbourhood Development Plan Policies post regulation 14

Parish Council Name: **Whitchurch and Ganarew Group Parish Council**

NDP Title: **Whitchurch and Ganarew Group Draft Plan reg 16**

Date undertaken: **January 2019**

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

NDP objectives, 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 objective/option/policy 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/policy and to be considered as part of Appropriate Assessment	Could the policy have likely significant effects on European sites (taking mitigation into account?)

Policies					
Policy WG1- Promoting Sustainable Development	<p>Increase in water consumption.</p> <p>Non-physical disturbance during construction phase.</p> <p>Physical damage of disturbance on a localised scale.</p> <p>Further protection of AONB</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) The river runs along the boundary of the parish.</p> <p>Wye Valley and Forest of Dean Bat Sites SAC.</p> <p>Wye Valley Woodlands SAC are within the group parish.</p>	No	<p>Not required. 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>Impact on the Wye Valley Woodlands and Wye Valley and Forest of Dean Bat sites SAC can be further assessed, when further details are known regarding new housing development. This will be assessed on a case by case basis.</p>
Policy WG2 Development Strategy	<p>New housing allocated in selected sites</p> <p>Increase in water consumption.</p> <p>Non-physical disturbance during construction phase.</p> <p>Physical damage of disturbance on a localised scale.</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) The river runs along the boundary of the parish.</p> <p>Wye Valley and Forest of Dean Bat Sites SAC.</p> <p>Wye Valley Woodlands SAC are within the group parish.</p>	No	<p>Not required. This policy will not have an impact on the River Wye sac, Wye Valley Woodlands and Wye Valley and Forest of Dean bat sites SACs.</p> <p>The scale and extent of development is unlikely to be significant, as the development is contained in a sustainable approach. Allocations help give greater certainty.</p>
Policy WG3 Housing Development in Whitchurch	<p>New housing development within the designation settlement boundaries of</p>	<p>Unlikely that there will be any significant effects on the European Site.</p>	<p>River Wye (including the</p>	No	<p>Not required. The scale and extent of potential housing development is unlikely to have a significant impact on the SAC.</p>

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	<p>Whitchurch and Ganarew .</p> <p>Increase in vehicle traffic.</p> <p>Increased demand for water abstraction and sewage treatment.</p>	<p>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>Lugg SAC).</p> <p>Wye Valley and Forest of Dean Bat Sites SAC.</p> <p>Wye Valley Woodlands SAC</p>		<p>Implementation of Core Strategy policy SD4, LD2, SD1 to grant planning permission will ensure water quality issues are addressed.</p> <p>Impact on the Wye Valley Woodlands and Wye Valley and Forest of Dean Bat sites SAC can be further assessed, when further details are known regarding new housing development. This will be assessed on a case by case basis.</p> <p>Changes to this policy post regulation 14, has a minor change to the settlement boundary removing part of the settlement boundary near the hotel. This change is unlikely to have a significant impact on the SACs.</p>
<p>Policy WG4 Housing development in Whitchurch</p>	<p>New housing on 2 sites for up to 12 dwellings in the identified settlement boundary of Whitchurch.</p> <p>Increase in water consumption.</p> <p>Non-physical disturbance during construction phase.</p> <p>Physical damage of disturbance on a localised scale.</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) The river runs along the boundary of the parish.</p> <p>Wye Valley and Forest of Dean Bat Sites SAC.</p> <p>Wye Valley Woodlands SAC are within the group parish.</p>	No	<p>Not required. 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>Impact on the Wye Valley Woodlands and Wye Valley and Forest of Dean Bat sites SAC can be further assessed, when further details are known regarding new housing development. This will be assessed on a case by case basis.</p>
<p>Policy WG5 Housing Development in Symonds Yat West</p>	<p>New housing development within the designation settlement boundaries in</p>	<p>Unlikely that there will be any significant effects on the European Site. All developments are</p>	<p>River Wye (including the</p>	No	<p>Not required. This policy will not have an impact on the River Wye sac, Wye Valley Woodlands and Wye Valley and Forest of</p>

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	<p>Symonds Yat West.</p> <p>Increase in vehicle traffic.</p> <p>Increased demand for water abstraction and sewage treatment.</p> <p>Increase in water consumption.</p> <p>Non-physical disturbance during construction phase.</p>	<p>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>Lugg SAC).</p> <p>Wye Valley and Forest of Dean Bat Sites SAC.</p> <p>Wye Valley Woodlands SAC</p>		<p>Dean bat sites SACs.</p> <p>The scale and extent of such development is unlikely to be significant, as the development is contained in a sustainable approach in accordance with policies SS1 and RA2 of the Core Strategy.</p> <p>Changes to this policy post regulation 14 consultation add further criteria to this policy. This criteria promotes appropriate development in line with the existing character of the village minimising potential harm to the natural and built environment.</p>
<p>Policy WG6 Affordable and intermediate Homes</p>	<p>Meeting housing needs in the group parish</p> <p>Small increase in affordable and intermediate homes being built in the group parish.</p> <p>Increased vehicle traffic</p> <p>Increased demand for water abstraction and sewage treatment</p> <p>Sustainable housing growth</p> <p>Mixture of people living within the group parish</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) The river runs along the boundary of the parish.</p> <p>Wye Valley and Forest of Dean Bat Sites SAC.</p> <p>Wye Valley Woodlands SAC are within the group parish.</p>	No	<p>Not required. This policy will not lead to development instead it provides criteria framework for affordable and intermediate homes within the parish.</p>
<p>Policy WG7 Housing</p>	<p>New development is in</p>	<p>Unlikely that there will be any significant effects</p>	<p>River Wye</p>	No	<p>No. This policy will not directly lead to development, instead it encourages fitting</p>

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Design and Appearance	<p>keeping with local environment</p> <p>Innovative and high quality design of new development</p> <p>Local environment retained and preserved.</p> <p>Sets out design criteria for development to adhere to.</p>	<p>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>(including the Lugg SAC) The river runs along the boundary of the parish.</p> <p>Wye Valley and Forest of Dean Bat Sites SAC.</p> <p>Wye Valley Woodlands SAC are within the group parish.</p>		<p>and environmentally supportive design to Whitchurch and Ganarew. Overall this is unlikely to have an impact on the River Wye sac, Wye Valley Woodlands and Wye Valley and Forest of Dean bat sites SACs.</p>
Policy WG8 Sustainable Design	<p>Sets out design criteria for development to adhere to.</p> <p>The built character is protected along with landscape character.</p> <p>New development is in keeping with local environment</p> <p>Promotion of sustainable design. Sustainable development encouraged.</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) The river runs along the boundary of the parish.</p> <p>Wye Valley and Forest of Dean Bat Sites SAC.</p> <p>Wye Valley Woodlands SAC are within the group parish.</p>	No	<p>No. This policy will not have an impact on the River Wye sac, Wye Valley Woodlands and Wye Valley and Forest of Dean bat sites SACs. No this policy will not directly lead to development. Instead it, aims to encourage suitable designed developments to be in keeping with the vernacular of Whitchurch and Ganarew.</p>
Policy WG9 Land adjacent to the River Wye to the east of Whitchurch	<p>Tourism growth</p> <p>Support accommodation tourism facilities within the land adjacent to the River</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</p>	<p>River Wye (including the Lugg SAC) The river runs along the boundary of</p>	.	<p>No. This policy will not have an impact on the River Wye sac, Wye Valley Woodlands and Wye Valley and Forest of Dean bat sites SACs.</p> <p>The scale and extent of potential</p>

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	<p>Wye and east of Whitchurch.</p> <p>Increase in vehicular traffic</p> <p>Further safeguards added to ensure development will not have a significant impact on the River Wye SAC.</p> <p>Farm diversification</p> <p>Regenerative projects to increase tourism</p>	<p>protect biodiversity and wildlife, and SD4 which seeks to ensure water quality of the SAC is not detrimentally effected.</p>	<p>the parish.</p> <p>Wye Valley and Forest of Dean Bat Sites SAC.</p> <p>Wye Valley Woodlands SAC are within the group parish.</p>		<p>employment development is unlikely to have a significant impact on the SAC. There are sufficient policy safeguards within the NDP and Core Strategy.</p>
<p>Policy WG10 Stoney Hills Industrial Estate and the complex of industrial and commercial buildings between the Old Ross Road and The Old Forge</p>	<p>Retained and enhanced employment sites.</p> <p>Potential construction traffic and noise.</p> <p>Job creation</p> <p>Intensification and enhancement of current business premises</p> <p>Encourage of small domestic based employment facilities.</p> <p>Promotion of business development</p> <p>Job creation in local area</p> <p>Small reduction in vehicular usage.</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) The river runs along the boundary of the parish.</p> <p>Wye Valley and Forest of Dean Bat Sites SAC.</p> <p>Wye Valley Woodlands SAC are within the group parish.</p>	<p>No.</p>	<p>No. This policy will not have an impact on the River Wye sac, Wye Valley Woodlands and Wye Valley and Forest of Dean bat sites SACs.</p> <p>The scale and extent of potential employment development is unlikely to have a significant impact on the SAC.</p> <p>There are sufficient policy safeguards within the NDP and Core Strategy to help to ensure there are no likely significant effects on the Wye Valley and Forest of Dean bat sites SAC, Wye Valley and Forest of Dean SAC. However this can be further assessed at planning application stage, when more details such as location and materials are known.</p>

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<p>Policy WG11 Use of Rural Buildings</p>	<p>Sustainable re use of agricultural buildings.</p> <p>Small scale development</p> <p>Live / work units supported</p> <p>Nonphysical disturbance caused from construction.</p> <p>Use of suitable materials in keeping with traditional materials used in rural buildings.</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) The river runs along the boundary of the parish.</p> <p>Wye Valley and Forest of Dean Bat Sites SAC.</p> <p>Wye Valley Woodlands SAC are within the group parish.</p>	<p>No.</p>	<p>No. It is unlikely that the policy will not have an impact on the River Wye sac, Wye Valley Woodlands and Wye Valley and Forest of Dean bat sites SACs.</p> <p>There are sufficient policy safeguards within the NDP and Core Strategy to help to ensure there are no likely significant effects on the Wye Valley and Forest of Dean bat sites SAC, Wye Valley and Forest of Dean SAC. However this can be further assessed at planning application stage, when more details such as location and materials are known.</p>
<p>Policy WG12 Working from home</p>	<p>Encourage of small domestic based employment facilities.</p> <p>Promotion of business development</p> <p>Job creation in local area</p> <p>Small reduction in vehicular usage / commuter traffic</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) The river runs along the boundary of the parish.</p> <p>Wye Valley and Forest of Dean Bat Sites SAC.</p> <p>Wye Valley Woodlands SAC are within the group parish.</p>	<p>No.</p>	<p>Not required. It is unlikely that the policy will not have an impact on the River Wye sac, Wye Valley Woodlands and Wye Valley and Forest of Dean bat sites SACs.</p> <p>There are sufficient policy safeguards within the NDP and Core Strategy to help to ensure there are no likely significant effects on the Wye Valley and Forest of Dean bat sites SAC, Wye Valley and Forest of Dean SAC. However this can be further assessed at planning application stage, when more details such as location and materials are known.</p>
<p>Policy WG13 Poly-tunnel policy</p>	<p>Appropriate poly tunnel development</p> <p>Rural business</p>	<p>Unlikely that there will be any significant effects on the European Site. All developments are required to meet the</p>	<p>River Wye (including the Lugg SAC) The river runs along</p>	<p>No.</p>	<p>Not required. This policy will not have an impact on the River Wye sac, Wye Valley Woodlands and Wye Valley and Forest of Dean bat sites SACs.</p>

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	<p>development</p> <p>Noise, odour and smell minimised.</p> <p>Unobtrusive lighting on new schemes.</p>	<p>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>the boundary of the parish.</p> <p>Wye Valley and Forest of Dean Bat Sites SAC.</p> <p>Wye Valley Woodlands SAC are within the group parish.</p>		
<p>Policy WG14</p> <p>Conserving the landscape and scenic beauty, both within and outside the Wye Valley AONB</p>	<p>Safeguard existing landscape against inappropriate development within the Wye Valley AONB.</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) The river runs along the boundary of the parish.</p> <p>Wye Valley and Forest of Dean Bat Sites SAC.</p> <p>Wye Valley Woodlands SAC are within the group parish.</p>	No	<p>Not required. This policy strives to protect and enhance the natural landscape and natural environment, 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>Policy WG15</p> <p>Enhancement of the natural environment</p>	<p>Protection and enhancement of the natural environment.</p> <p>Encouragement of sustainable development which preserves and protects the landscape, environment</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) The river runs along the boundary of the parish.</p> <p>Wye Valley and Forest of Dean</p>	No	<p>Not required. This policy strives to protect and enhance the natural environment, 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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	and habitats.	detrimentally effected	Bat Sites SAC. Wye Valley Woodlands SAC are within the group parish.		
Policy WG16 Protecting Heritage assets	Sustainable re use of agricultural buildings. Sustainable development encouraged within the identified settlements. Minimal increase demand for water abstraction and sewage treatment Sustainable housing growth	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) The river runs along the boundary of the parish. Wye Valley and Forest of Dean Bat Sites SAC. Wye Valley Woodlands SAC are within the group parish..	No	Not required. This policy strives to protect and enhance the historic built environment, 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.
Policy WG17 Protection from flood risk	Strive to reduce impact of flooding within Whitchurch and Ganarew. New development designed to appropriately reduce flood risk. Sustainable design promoted. Infrastructure development phased in line with infrastructure works within the plan period.	This policy will help to safeguard against flooding from foul and storm drainage.	River Wye (including the Lugg SAC). Wye Valley and Forest of Dean Bat Sites SAC. Wye Valley Woodlands SAC	No.	Not required. This policy will not have an impact on the River Wye sac, Wye Valley Woodlands and Wye Valley and Forest of Dean bat sites SACs. This policy ensures new development in Whitchurch and Ganarew is safeguarded against flooding. Also that the infrastructure will have enough capacity for any planned development. There are sufficient policy safeguards within the NDP and Core Strategy. This policy post regulation 14 provides further criteria to ensure new development is appropriately tested in

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					line with the Core Strategy and NPPF.
Policy WG18 Sewerage infrastructure	<p>Reduce impact of flooding and storm water flooding within Whitchurch and Ganarew.</p> <p>Sustainable design promoted.</p> <p>Infrastructure development phased in line with infrastructure works within the plan period.</p>	<p>This policy will help to safeguard against flooding from foul and storm drainage along with identifying sewerage treatment works in line with WwTWs.</p>	<p>River Wye (including the Lugg SAC).</p> <p>Wye Valley and Forest of Dean Bat Sites SAC.</p> <p>Wye Valley Woodlands SAC.</p>	No.	<p>Not required. This policy will not have an impact on the River Wye sac, Wye Valley Woodlands and Wye Valley and Forest of Dean bat sites SACs.</p> <p>This policy ensures new development in Whitchurch and Ganarew is safeguarded against flooding and there is sufficient capacity in the WwTws. Also that the infrastructure will have enough capacity for any planned development.</p>
Policy WG19 Renewable and low carbon energy	<p>Support for renewable and low carbon energy proposals</p> <p>Development of renewable energy schemes on a domestic scale</p> <p>Support community and local businesses renewable energy schemes and low carbon proposals</p> <p>Reduction on carbon based energy usage in the long term</p>	<p>This policy supports renewable energy schemes and low carbon energy schemes. This is unlikely to have a significant impact on the SACs.</p>	<p>River Wye (including the Lugg SAC).</p> <p>Wye Valley and Forest of Dean Bat Sites SAC.</p> <p>Wye Valley Woodlands SAC</p>	No.	<p>Not required. This policy will not have an impact on the River Wye sac, Wye Valley Woodlands and Wye Valley and Forest of Dean bat sites SACs.</p> <p>This policy ensures suitable community energy projects will have minimal environmental impact. Therefore is unlikely to impact on the SACs.</p>
Policy WG20 Traffic measures within the parish	<p>Promotion of safer roads.</p> <p>Improved sustainable modes of transport such as cycling, walking, and public</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</p>	<p>River Wye (including the Lugg SAC).</p> <p>Wye Valley and</p>	No.	<p>Not required. This policy will not lead to development instead it provides traffic alleviation measures for developments to adhere to.</p>

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	<p>transport links.</p> <p>Decrease in nonphysical disturbances- noise</p> <p>Increase in walking and cycling.</p> <p>Decrease in traffic accidents.</p> <p>Development of transport infrastructure</p> <p>Traffic Calming measures</p> <p>Improvement of road safety</p>	<p>protect biodiversity and wildlife, and SD4 which seeks to ensure water quality of the SAC is not detrimentally effected.</p>	<p>Forest of Dean Bat Sites SAC.</p> <p>Wye Valley Woodlands SAC</p>		
<p>Policy WG21 Highway design requirements</p>	<p>Sets out criteria for highway design.</p> <p>Sustainable development encouraged.</p> <p>Decrease in nonphysical disturbances- noise</p> <p>Increase in walking and cycling.</p> <p>Decrease in traffic accidents.</p> <p>Development of transport infrastructure</p> <p>Traffic Calming measures</p> <p>Improvement of road safety</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).</p> <p>Wye Valley and Forest of Dean Bat Sites SAC.</p> <p>Wye Valley Woodlands SAC</p>	<p>No.</p>	<p>Not required. This policy will not lead to development instead it provides highway design requirements for developments to adhere to.</p> <p>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>Policy WG22 Protection and enhancement of Parish facilities and services</p>	<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>	<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).</p> <p>Wye Valley and Forest of Dean Bat Sites SAC.</p> <p>Wye Valley Woodlands SAC</p>	<p>No.</p>	<p>No. This policy will not have an impact on the River Wye sac, Wye Valley Woodlands and Wye Valley and Forest of Dean bat sites SACs.</p> <p>Although this policy could result in the development of new community facilities or the loss of existing provision to new uses, which depending on location could have potential effect on the River Wye SAC. However, sufficient policy safeguards are in place within the Local Plan (Core Strategy) and with the inclusion of additional wording in the Whitchurch and Ganarew NDP policy.</p>
<p>Policy WG23 Contributions to Parish Services, youth provision and recreation facilities</p>	<p>Support and upkeep of existing local community facilities through section 106 and CIL funds.</p> <p>Promote new development of community facilities.</p> <p>Increase in vehicular movements.</p> <p>Increase in nonphysical disturbance.</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).</p> <p>Wye Valley and Forest of Dean Bat Sites SAC.</p> <p>Wye Valley Woodlands SAC</p>	<p>No.</p>	<p>No, although this policy could result in the re development of new community facilities or the loss of existing provision to new uses, which depending on location could have potential effect on the Wye Valley and Forest of Dean Bat sites. However, sufficient policy safeguards are in place within the Local Plan (Core Strategy) and with the inclusion of additional wording in the NDP policy ensure there are no significant effects on the River Wye.</p>
<p>Policy WG24 Broadband infrastructure</p>	<p>Development and improvement of existing broadband infrastructure.</p> <p>Broadband strengthen and improved</p> <p>Increase in local businesses and productivity</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).</p> <p>Wye Valley and Forest of Dean Bat Sites SAC.</p> <p>Wye Valley</p>	<p>No.</p>	<p>Not required. This policy will not lead to development instead it provides broadband and telecommunication criteria, for new development to adhere to.</p>

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	<p>Increase in working from home</p> <p>Greater connectivity to the county, country and globe.</p> <p>Small decrease in vehicular usage</p>	<p>quality of the SAC is not detrimentally effected.</p>	<p>Woodlands SAC</p>		

Appendix 4

HRA Consultation Feedback

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

Parish Council Name: Whitchurch and Ganarew Group Parish

Neighbourhood Development Plan Name: Whitchurch and Ganarew Neighbourhood Plan

Details of consultation:

Consultation date: 9 April to 21 May 2018

Consultation title: Regulation 14

Response Date	Consultee	Summary of Comments	Response to Comments
17.05.18	Natural England	<p>Natural England notes the screening process applied to this Neighbourhood plan. We agree with the conclusion that further assessment is required to establish no likely significant effects on the following designations:</p> <ul style="list-style-type: none">• River Wye SAC.• Wye Valley and Forest of Dean Bat Sites SAC <p>Natural England notes the proximity of allocated sites in the draft plan to the River Wye SAC, and recommends that further consideration is given to these policies to ensure that impacts on the Wye are avoided.</p>	Duly noted.