

Habitats Regulations Assessment

Report for:

Goodrich and Welsh Bicknor Group Neighbourhood Area
March 2019



Goodrich and Welsh Bicknor Group Neighbourhood Plan HRA

HRA Screening Assessment

Contents

4	le	.+.	_	4.	ıcti	_	
1	ır	ITT	O	O L U	IC:TI	n	n

Map of the Neighbourhood Area with European sites shown

- 2 The requirement to undertake Habitats Regulations Assessment of Neighbourhood Plans Legislative background
- 3 Methodology HRA Stages
- 4 Results of the Initial Scoping Report and qualifying features of European sites
- 5 Description of the Goodrich and Welsh Bicknor Group Neighbourhood Plan NDP policies

Table 1 - Colour coding key for Matrix

- 8 Conclusions from the Screening Matrix and if any 'likely significant effects'
- 9 Identification of other plans and projects which may have 'in-combination' effects
- 10 Conclusion
- 11 Next steps

Appendix 1 – Initial Screening Report (August 2016)

Appendix 2 - List of options assessed

Appendix 3 –Full Screening matrix of final policies and sites

Appendix 4 – Feedback on Habitat Regulation Assessment Report consultation (February 2018)

Appendix 5- HRA feedback from NE

Appendix 6 – Rescreening of policies post examination (March 2019)

Appendix 7-Examiners recommendations (March 2019)

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 Goodrich and Welsh Bicknor Group Parish Council have produced a Neighbourhood Development Plan for Goodrich and Welsh Bicknor 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 Goodrich and Welsh Bicknor Plan (March 2019).
- 1.3 The NDP allocates sites, contains criteria based polices and designates a settlement boundary within the settlement of Goodrich. It 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 Goodrich and Welsh Bicknor 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, Goodrich and Welsh Bicknor 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 August 2016 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 (February 2018) and reviewed in terms of the implications of *Sweetman*.

3 Methodology

- 3.1 Although the Goodrich and Welsh Bicknor NDP is not in direct management of any European sites, it does includes 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 (August 2016) found that the River Wye (including the River Lugg) SAC is located inside the parish and the parish falls within the hydrological catchment of the River Wye.. Figure 2 below highlights the location of River Wye SAC, Wye Valley Woodlands are in the parish and Wye Valley and Forest of Dean Bat sites SAC are 5.5km away from the parish in relation to the neighbourhood area.



4.2 There is also 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.

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.

- 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.
- 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 Goodrich and Welsh Bicknor Initial Screening Report. The Initial Screening Report, August 2016, 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 Goodrich and Welsh Bicknor 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 Goodrich and Welsh Bicknor 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 Goodrich and Welsh Bicknor Initial Screening Report. The Initial Screening Report, August 2016, 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 Goodrich and Welsh Bicknor 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 Goodrich and Welsh Bicknor 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 Goodrich and Welsh Bicknor Plan Initial Screening Report. The Initial Screening Report, August 2016, 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 Goodrich and Welsh Bicknor 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 Goodrich and Welsh Bicknor Plan progresses from options onto their NDP policies, the Plan will need to identify ways in which the Goodrich and Welsh Bicknor 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 Goodrich and Welsh Bicknor Neighbourhood Development Plan

- 5.1 The submission Goodrich and Welsh Bicknor 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; "Our community will be a place where people can enjoy living and working in a rural setting. The predominantly quiet, small scale nature of our parish will be preserved whilst accommodating the growth and development needed to meet the needs of the community and promote a sustainable and thriving community life."

There are six objectives of how this will be achieved. The objectives cover then following topics:

- Local environment
- New housing.
- Infrastructure and roads
- Community facilities
- Energy
- Economic development and Employment
- 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 and Wye Valley Forest of Dean Bat sites SAC. Of the five general options put forward the 'no NDP / do nothing' option was not considered viable for the Parish. 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. The options considered are listed below.

Option 1- Locating housing sites to meet the required level within or adjacent to the two settlement areas Goodrich Church and Goodrich Cruse.

Option 2- In addition to the settlement areas described in option 1, including Goodrich Cross as a further settlement area from which the best sites may be chosen. Goodrich Cross is a settlement of some 53 houses set on each side of the A40.

Option 3- Seeking a wider definition of what the settlement of Goodrich might comprise where it might encompass other areas around the three built-up areas.

Option 4- To provide for a notable expansion beyond the level of required housing growth within whichever of the previous three options is chosen.

Option 5-Do nothing

As Goodrich and Welsh Bicknor Neighbourhood Plan progressed from options to draft NDP policies, the Plan needed to identify ways in which the Goodrich and Welsh Bicknor effect on the River Wye SAC, Wye Valley Woodlands and Wye Valley and forest of Dean bat sites 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 in appendix 2. The full screening assessment for these options were assessed in February 2018, these can be found in the Regulation 14 HRA report.

Site Options

5.5 Goodrich and Welsh Bicknor considered 12 site options in order to demonstrate potential to deliver proportionate growth within Goodrich and Welsh Bicknor. The options are listed below. Option 1, 2 and 6 is the preferred option as it provides the most certainty for future development. This option allocates sites and a settlement boundary, as well as using a criteria based policy to define areas for development. This option has an overall positive/ neutral impact on the baseline objectives and help set out criteria for potential development, allocate sites within the settlement boundary in Goodrich and Welsh Bicknor and definition of a settlement boundary.

Site Option 1-Land opposite Nutshell Caravan Park
6 dwellings

Site Option 2- Nutshell Caravan Site
15 dwellings

Site Option 3- Land next to Old Caravan Site on Marstow Lane
5-7 dwellings

Site Option 4- Land behind Dean Swift Close
3 dwellings

Site Option 5- Site opposite Goodrich Manor
8-10 dwellings

Site Option 6- Land off Springfield Rd., N of Goodrich Manor 9
dwellings

Site Option 7- Land Adjacent to Bryants Court Cottages
8-10 dwellings

Site Option 8- Church Field

3 dwellings
Site Option 9- Land next to Bryants Court
6-8 dwellings
Site Option 10- Land next to Bryants Court
35-40 dwellings
Site Option 11- Land next to South Lodge
5 dwellings
Site Option 12- The Square
6-10 dwellings

- The 12 site options above, most had no significant effect on the SACs, this is mostly down to the small nature of the sites proposed as well as the majority of the sites were in or around the identified settlement boundary, deeming the locations a place of sustainable growth. Of the 12 sites 1 site was deemed of having a potential significant impact, due to scale, size and location of the proposed scheme.
- 5.7 Majority of the site options were screened and were considered unlikely to have a significant effect on the SACs. This is due to suitable locations and size of the potential development that is close to the defined settlement of Goodrich and Welsh Bicknor. The three sites that have finally been selected 1,2,6. The selected sites have been rescreened in appendix 3. None have been found to have a significant effect on the SACs.
 - The NDP also sets out 21 policies on various topics based on the objective headings above and also for group parish, these include:

Policy GWB	1 Promoting Sustainable Development
Policy GWB	2 Conserving the landscape and scenic beauty within the Wye Valley AONB
Policy GWB3	3 t of the natural environment
Policy GWB	
Policy GWB	
Policy GWB	
Policy GWB: Sewerage Inf	
Policy GWB8 Traffic Measu	8 ures within the Group Parish
Policy GWB	9 Highway Design Requirements
Policy GWB	10 Broadband and Telecommunication Infrastructure
Policy GWB	11 Protection and Enhancement of Community Facilities and Services
Policy GWB	12 Contributions to Community Services, Youth Provision and Recreation Facilities
Policy GWB	13 Moors Meadow and Church Field Local Green Space
Policy GWB	14 Housing Development in Goodrich Village
Policy GWB	15 Housing Sites in Goodrich Village
Policy GWB	16 Meeting Housing Needs
Policy GWB	17 Affordable and Intermediate Homes

Policy GWB18 Tourism Enterprises
Policy GWB19 Scale of Economic Development
Policy GWB20 Farm Diversification
Policy GWB21 Working from Home

6.0 Assessments undertaken to date of the emerging Goodrich and Welsh Bicknor 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 Goodrich and Welsh Bicknor 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.
- 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 being 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.
- None of the Goodrich and Welsh Bicknor NDP objectives and policies (March 2018) were concluded to be likely to have a significant effect on the European sites. The parish itself does not have the River Wye SAC in the parish, however it is in the parish. The settlement of Goodrich and Welsh Bicknor and site allocations are not in close proximity to the river and unlikely to have a direct significant impact on the SAC. Policy GWB7 and Core Strategy policy SD3 and SD4 together will the Nutrient Management Plan will ensure that development can only occur if these policy requirements are met.
- 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 Goodrich and Welsh Bicknor Neighbourhood Plan will have any incombination 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 Reg14 Goodrich and Welsh Bicknor 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)

Screening of modifications to NDP (Reg16)

- The Submission NDP (August 2018) 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 GWB7 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.
- Assessment of the 'likely significant effects' of the submission Goodrich and Welsh Bicknor 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.

Screening of modifications to NDP Post examination

- 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. The examiner's recommended changes can be found in appendix 7.
- 7.5 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. 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 main changes have occurred to policies GW1, GWB11, GWB13 and GW15. These have been rescreened and results have found that none of these policies require an appropriate assessment the re assessment can be found in appendix 6. The changes have clarified and enhance these polices, helping them appropriately align with strategic policy.

8 Conclusions from the Screening Matrix

8.1 None of the final Goodrich and Welsh Bicknor Neighbourhood Plan (March 2019) 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 party down to scale and extent of plan also the Goodrich and Welsh Bicknor 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 in development can only occur if these criteria are met.
- 8.3 Commitments and completions from April 2011-April 2018 28 dwellings, leaving a residual figure of 7 to find within the parish of Goodrich and Welsh Bicknor. The plan allocates settlement boundaries for development within Goodrich and Welsh Bicknor. The three allocated sites for development to support up to 15-20 dwellings, along with the development and windfall which will exceed the housing target of 35 from 2011 to 2031.
- 8.4 There are three allocated sites for development in eastern Goodrich. 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 of a small scale and is 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.
 - 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.
- 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.
- Policy SD4 of the Core Strategy of the NDP indicate that development would not 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. Goodrich and Welsh Bicknor 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 additional 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 Goodrich and Welsh Bicknor 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 incombination 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 Walford 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 Gloucester 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 Goodrich and Welsh Bicknor Neighbourhood Plan will have any incombination 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 Goodrich and Welsh Bicknor 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 final report will be published alongside the final Goodrich and Welsh Bicknor 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 Goodrich and Welsh Bicknor NDP.

Appendix 1



Initial Habitat Regulations Assessment and Strategic Environmental Assessment Screening Notification

The Neighbourhood Planning (General) (Amendment) Regulations 2015 (Reg. 32)

Conservation of Habitats and Species Regulations 2010 (d)

Neighbourhood Area:	Goodrich & Welsh Bicknor Neighbourhood Area		
Parish Council:	Goodrich & Welsh Bicknor Group Parish Council		
Neighbourhood Area Designation Date:	16 August 2016		

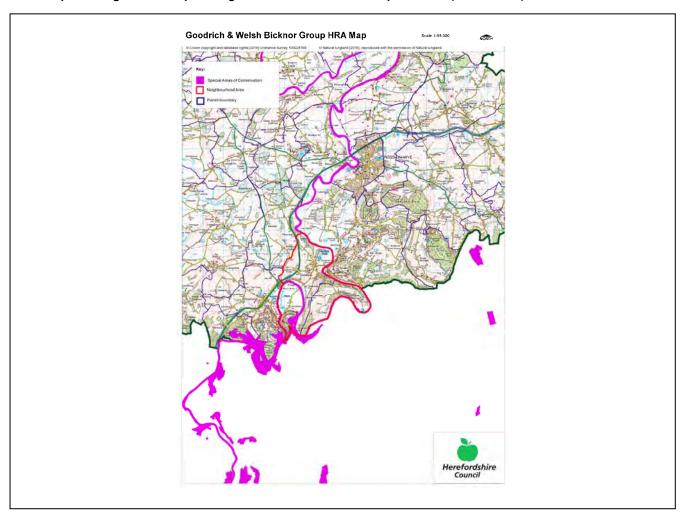
Introduction

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)



River Wye (including the River Lugg) Special Area of Conservation (SAC):

Does the Neighbourhood Area have the River Wye (including the River Lugg) in or next to its boundary?	Υ	The River Wye (including the River Lugg) SAC runs along the boundary of the Group Parish
Is the Neighbourhood Area in the hydrological catchment of the River Wye (including the River Lugg) SAC?	Υ	The Group Parish is within the River Wye hydrological catchment area.
If yes above, does the Neighbourhood Area have mains drainage to deal with foul sewage?	Υ	There is mains drainage at Goodrich

Downton Gorge SAC:

Is the Neighbourhood Area within 10km of Downton Gorge SAC?	N	Downton Gorge is 54km away from the Group Parish
-------------------------------------------------------------	---	--------------------------------------------------

River Clun SAC:

Does the River Clun border the Neighbourhood	N	The River Clun does not border the
Area		Group Parish

Wye Valley & Forest of Dean Bat Sites SAC:

Is the Neighbourhood Area within 10km of any of		The Wye Valley and Forest of Dean Bat	
the individual sites that make up the Wye Valley &		Sites are 5.5km away from the Group	
Forest of Dean Bat Sites?		Parish	

Wye Valley Woodlands SAC:

Is the Neighbourhood Area within 10km of any of		The Wye Valley Woodlands are within	
the individual sites that make up the Wye Valley		the Group Parish	
Woodlands Site?			

HRA Conclusion:

The assessment above highlights that European Sites will need to be taken into account in the future Neighbourhood Development Plan for the Goodrich & Welsh Bicknor Group Neighbourhood Area and a Full HRA Screening will be required.

European Site

(List only those which are relevant)

River Wye (including the River Lugg) Special Area of Conservation (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 Goodrich & Welsh Bicknor 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.

		Within Neighbourhood Area		Bordering Neighbourhood Area		
SEA features	Total number	Name(s)	Total number	Name(s)		
Ancient Woodland	6	Thomas Wood; Park Wood; Coldwell Wood; Collins Grove; Elliotts Grove; Huntsham Hill Wood.	11	Ferny Bank, Mayers Grove; Dam Wood; Wet Wood; Beechtree Wood; Tumps Wood; Ferry Wood; Yew Wood; Crabtree Ption (East); Brookshead Grove; Woodside Wood; Trebandy Wood.		
Areas of Outstanding Natural Beauty (AONB)	1	Wye Valley.	0	-		
Conservation Areas	0	-	0	-		
Flood Areas	Flood Zones follow the River Wye and tributaries off this.					
Geoparks	0	-	0	-		
Listed Buildings	There are numerous Listed Buildings throughout the Group Parish.					
Local Geological Sites (LGS)	5	Goodrich Castle; Huntsham Bridge; Huntsham Hill road cutting; White Fox, Coppett Hill; Huntsham Hill south.	6	Quarry north of King Arthurs Cave; King Arthurs Cave; The Biblins; Little Doward Hillside; Lords Wood Quarry;		

				Limestone Pavement, Little Doward.
Local Wildlife Sites (LWS)	8	Goodrich Court Wilderness; River Wye; Marsh near Goodrich; Pool Ellocks; Park Wood; Coppett Hill and adjoining woodlands; Garren Brook; The Doward and Huntsham Hill.	7	Disused railway line, Ross to Kerne Bridge; Coughton Wood and Marsh; Howle Hill and Marks Well; Field near Forest Green; Field near Kiln Green; Woodland east of Kern Bridge; Dam Wood and Copse, Coal Hill and 16 Acre Wood.
Mineral Reserves	4	In bend of River Wye, north of Huntsham Court and Huntsham Hill; The Windles, east of Welsh Bicknor to Courtfield; South of Symonds Yat; East of Symonds Yat, on opposite bank to River Wye.	3	Great Doward, Little Doward including Lords Wood; West of Wye, east of Rockview Farm; Howle Hill, Kiln green, west of Hope Mansell, south east of Coughton.
National Nature Reserve (NNR)	0	-	0	-
Nature Trails	1	Wye Valley Walk.	0	-
Registered Parks and Gardens	0	-	0	-
Scheduled Ancient Monuments (SAM)	4	Goodrich Castle; Flanesford Priory; Dry Arch Bridge 300yds (270m) north east of St Giles Church; Kerne Bridge.	4	Churchyard Cross in St Dubricius' Churchyard; Merlin's Cave, Great Doward; Little Doward Camp; King Arthurs Cave, Great Doward.
Sites of Importance in Nature Conservation (SINC)	0	-	0	-
Special Areas of Conservation (SAC)	2	River Wye; Wye Valley Woodlands.	0	-
Unregistered parks and gardens	3	Goodrich Court; Huntsham Court; Courtfield.	2	Hazelhurst; Bishopswood.

			SSSI Status		SSSI Status
Sites of Special Scientific Interest (SSSI)	3	River Wye;	Unfavourable 3 Recovering;	Great Doward;	Unfavourable Recovering;
interest (3331)		Park Wood;	Unfavourable	Coughton Wood & Marsh;	Unfavourable
			Recovering;		Recovering;
		Upper Wye Gorge.	Favourable,	Brooks Head Grove.	Favourable.
			Unfavourable Recovering.		

Decision Notification:

The initial screening highlights that the Neighbourhood Development Plan for the Goodrich & Welsh Bicknor Group Neighbourhood Area:

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

Assessment date: 5 August 2016

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: Tilio-Acerion 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 Margaritifera margaritifera

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 *Ranunculion fluitantis* and *Callitricho-Batrachion* vegetation. Transition mires and quaking bogs. White-clawed (or Atlantic Stream) crayfish *Austropotamobius pallipes*. Sea lamprey *Petromyzon marinus*. Brook lamprey *Lampetra planeri*. River lamprey *Lampetra fluviatilis*. Twaite shad *Alosa fallax*. Atlantic salmon *Salmo salar*. Bullhead *Cottus gobio*. Otter *Lutra lutra*. Allis shad *Alosa alosa*

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."

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

GOODRICH AND WELSH BICKNOR OPTIONS

Option 1-Locating housing sites to meet the required level within or adjacent to the two settlement areas Goodrich Church and Goodrich Cruse.

Option 2-In addition to the settlement areas described in option 1, including Goodrich Cross as a further settlement area from which the best sites may be chosen. Goodrich Cross is a settlement of some 53 houses set on each side of the A40.

Option 3-Seeking a wider definition of what the settlement of Goodrich might comprise where it might encompass other areas around the three built-up areas.

Option 4-To provide for a notable expansion beyond the level of required housing growth within whichever of the previous three options is chosen.

Option 5- Do nothing

Site Options- 30 sites were initially looked at from call of sites in autumn 2017, 12 sites were assessed further as site options.

Site Option 1-Land opposite Nutshell Caravan Park	
6 dwellings	
Site Option 2- Nutshell Caravan Site	
15 dwellings	
Site Option 3- Land next to Old Caravan Site on Marstow Lane	
5-7 dwellings	
Site Option 4- Land behind Dean Swift Close	
3 dwellings	
Site Option 5- Site opposite Goodrich Manor	
8-10 dwellings	
Site Option 6- Land off Springfield Rd., N of Goodrich Manor 9 dwellings	
Site Option 7- Land Adjacent to Bryants Court Cottages	
8-10 dwellings	
Site Option 8- Church Field	
3 dwellings	
Site Option 9- Land next to Bryants Court	
6-8 dwellings	
Site Option 10- Land next to Bryants Court	
35-40 dwellings	
Site Option 11- Land next to South Lodge	
5 dwellings	
Site Option 12- The Square	
6-10 dwellings	

Appendix 3

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

Parish Council Name: Goodrich and Welsh Bicknor Group Parish Council

NDP Title: Goodrich and Welsh Bicknor Group Draft Plan reg 14

Date undertaken: February 2018

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?)
To develop the built environment in a way that maintains and enhances its distinctiveness and attractiveness whilst catering for the housing needs of all age groups	Housing development Maintain character and distinctiveness of Goodrich and Welsh Bicknor.	This objective itself is likely to mitigate the impact caused from development.	River Wye (including the Lugg SAC). Wye Valley and Forest of Dean Bat Sites SAC. Wye Valley Woodlands	The objective will help safeguard against unsuitable development in Goodrich and Welsh Bicknor.	No, this objective will not directly lead to development. Instead it aims to support appropriate development that caters for

			SAC		
To encourage successful farming and small businesses, where members of the community can find employment	Promote successful farming practises. Employment and local job creation Small increase in traffic and usage of natural resources. Water absorption and usage	Impact on the SACs can be better assessed when further details such as location and type of business are known. However the likelihood is that these businesses will be a small scale and rural in nature.	River Wye (including the Lugg SAC). Wye Valley and Forest of Dean Bat Sites SAC. Wye Valley Woodlands SAC	There are safeguards within the Core Strategy and Neighbourhood Plan that can help mitigate impact from development and effects from new businesses/ employment areas.	No. This supports small scale farming and businesses encouraging employment within Goodrich and Welsh Bicknor. Safeguards within the NDP will help alleviate impact from new development and unlikely to have a significant impact on the SACs.
To maintain and enhance the natural environment and the local heritage	Protect And enhance the existing natural environment, landscape and views. Sustainable development encouraged. Local heritage is protected against inappropriate development.	This objective itself is likely to mitigate the impact caused from development.	River Wye (including the Lugg SAC). Wye Valley and Forest of Dean Bat Sites SAC. Wye Valley Woodlands SAC	The objective will help safeguard against unsuitable development in Goodrich and Welsh Bicknor.	No, this objective will not directly lead to development. Instead it aims to encourage suitable designed developments to be in keeping with the vernacular of Goodrich and Welsh Bicknor.

Policies					
Policy GWB1 Promoting Sustainable Development	New housing allocated in selected sites to accommodate up to 30 dwellings Increase in water consumption. Non-physical disturbance during construction phase. Physical damage of disturbance on a localised scale. Further protection of AONB	Uncertain as to the impacts upon the River Wye SAC dependent on the location of any development. Housing development, infrastructure development Possible increase in recreation activities, vehicular movements and demand for water abstraction and treatment. Physical damage of disturbance on a localised scale. Non-physical disturbance such as noise.	River Wye (including the Lugg SAC). Wye Valley and Forest of Dean Bat Sites SAC. Wye Valley Woodlands SAC	Good practice construction techniques include noise suppression measures; hours of operation may help to mitigate potential adverse effects during construction. Measures within Core Strategy policy SD1 should help to mitigate potential impacts relating to non-physical disturbances.	No. 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. Due to the safeguarding criteria included within the NDP and Core Strategy, this policy is unlikely to have an impact on the River Wye, Wye Valley Woodlands and Wye Valley and Forest of Dean bat sites SACs.
Policy GWB2 Conserving the landscape and scenic beauty within the Wye Valley AONB	Safeguard existing landscape against inappropriate development within the Wye Valley AONB. Encouragement of sustainable development which preserves and protects the landscape, environment and habitats.	This policy itself is likely to mitigate the impact caused from development. Therefore will help to safeguard the natural and manmade landscape within the Wye Valley AONB.	River Wye (including the Lugg SAC). Wye Valley and Forest of Dean Bat Sites SAC. Wye Valley Woodlands SAC	None. This policy acts as a mitigation measure to ensure developments to be fitting for its context and ensures protection to the exiting landscape.	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. This policy ensures existing landscape within the AONB is protected against inappropriate development.

Policy GWB3 Enhancement of the natural environment	Protection and enhancement of the natural environment. Encouragement of sustainable development which preserves and protects the landscape, environment and habitats. Protection against impact on the amenity of Goodrich Castle and Coppet Hill Local Nature Reserve.	This policy itself is likely to mitigate the impact caused from development. This policy actively promotes the protection of the conservation status of the River Wye and Coppet Hill Local Nature Reserve.	River Wye (including the Lugg SAC). Wye Valley and Forest of Dean Bat Sites SAC. Wye Valley Woodlands SAC	None. This policy acts as a mitigation measure to ensure environmental protection and enhancement in Goodrich and Welsh Bicknor.	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. This policy ensures existing environment particularly the River Wye and Coppet Hill is protected against inappropriate development.
Policy GWB4 Protecting Heritage Assets	Protection and enhancement of heritage assets within Goodrich and Welsh Bicknor. Sensitive housing development nearby heritage assets. Unregistered parks and gardens protected against insensitive development Positively promoting sensitive conversions of historic farmsteads	This policy itself is likely to mitigate the impact caused from development.	River Wye (including the Lugg SAC). Wye Valley and Forest of Dean Bat Sites SAC. Wye Valley Woodlands SAC	None. This policy acts as a mitigation measure to ensure heritage protection and enhancement in Goodrich and Welsh Bicknor.	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. The policy is a mitigation measure to protect heritage assets within Goodrich and Welsh Bicknor.
Policy GWB5 Protection from flood risk	Strive to reduce impact of flooding within Goodrich and Welsh Bicknor. New development designed to appropriately reduce flood risk.	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	None. This policy acts as a mitigation measures to ensure new developments avoid and alleviate flooding impacts in Goodrich and Welsh Bicknor.	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. This policy ensures new

	Sustainable design promoted. Infrastructure development phased in line with infrastructure works within the plan period. Support for SUDs to be used in new development.		SAC. Wye Valley Woodlands SAC		development in Goodrich and Welsh Bicknor 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 to help avoid or mitigate any likely significant effects on the Wye Valley and Forest of Dean bat sites SACs.
Policy GWB6 Sustainable Design	Promotion of sustainable design. Sustainable development encouraged. The built character is protected along with landscape character. Utilisation and development of sustainable building design Promotion of sustainable transport measures Minimise waste production	This policy itself is likely to mitigate the impact caused from development by ensuring design is suited to surrounding.	River Wye (including the Lugg SAC). Wye Valley and Forest of Dean Bat Sites SAC. Wye Valley Woodlands SAC	None. This policy acts as a mitigation measure to ensure development is sustainable in the lifecycle of developments. This policy supports renewable energy schemes and minimise traffic and waste within developments.	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. This policy promotes sustainable design and development within the plan period, criteria within this policy will help alleviate and minimise potential impact on the SACs in the short, medium and long term timescale of the plan.
Policy GWB7 Sewerage Infrastructure	Utilisation of existing sewage infrastructure Support developer contributions for infrastructure improvement.	None identified.	River Wye (including the Lugg SAC). Wye Valley and Forest of Dean Bat Sites	Measures are included in both the Core Strategy and the Goodrich and Welsh Bicknor Neighbourhood Plan to help relieved any increased pressure on the	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.

Policy GWB8 Traffic Measures within the Group Parish	Promotion of safer roads. Improved sustainable modes of transport such as cycling, walking, and public transport links. Decrease in nonphysical disturbances- noise Increase in walking and cycling. Decrease in traffic accidents.	Any effects of additional transport will be mitigated with providing additional highway and transport measures.	SAC. Wye Valley Woodlands SAC River Wye (including the Lugg SAC). Wye Valley and Forest of Dean Bat Sites SAC. Wye Valley Woodlands SAC	None. This policy acts as a mitigation measure to ensure new development could help to alleviate traffic speeds and promote sustainable and public transport means.	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. This policy would only lead to some sustainable transport improvements as well as promoting transport choices and highway safety. There are policy safeguards within the Core
Policy GWB9	Development of transport infrastructure Traffic Calming measures Improvement of road safety Sets out criteria for highway	This policy itself is likely	River Wye	None. This policy acts as a	Strategy to mitigate any potential likely significant effects. Of new development. No. This policy will not have
Highway Design Requirements	design. Sustainable development encouraged. Decrease in nonphysical disturbances- noise Increase in walking and cycling.	to mitigate the impact caused from development.	(including the Lugg SAC). Wye Valley and Forest of Dean Bat Sites SAC. Wye Valley Woodlands	mitigation measure to ensure new development will promote road safety.	an impact on the River Wye sac, Wye Valley Woodlands and Wye Valley and Forest of Dean bat sites SACs.

Policy GWB10 Broadband and Telecommunication Infrastructure	Decrease in traffic accidents. Development of transport infrastructure Traffic Calming measures Improvement of road safety Broadband strengthen and improved Increase in local businesses and productivity Increase in working from home Greater connectivity to the county, country and globe. Small decrease in vehicular usage	Unlikely that there will have a significant effect on the European Site.	River Wye (including the Lugg SAC). Wye Valley and Forest of Dean Bat Sites SAC. Wye Valley Woodlands SAC	Measures included within policy SD2 of the Core Strategy should help to mitigate potential impacts relating to non-physical disturbances. Good practice construction techniques include noise suppression measures; hours of operation may help to mitigate potential adverse effects during construction.	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. The policy will result in an improvement of communications infrastructure. Impact during the construction phase can be mitigated by policies within the Goodrich and Welsh Bicknor NDP and Herefordshire Local Plan Core Strategy.
Policy GWB11 Protection and Enhancement of Community Facilities and Services	Community facilities and services protected and improved. Increase of visitors using facilities. More activities and events Greater social mobility	Unlikely that there will have a significant effect on the European Site.	River Wye (including the Lugg SAC). Wye Valley and Forest of Dean Bat Sites SAC. Wye Valley Woodlands SAC.	This policy lists mitigation criteria if there are proposals to improve or add further facilities.	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 intends to retain Community facilities and the services they provide. It lists criteria to enhance and protect existing facilities. 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 Goodrich and Welsh Bicknor NDP policy to avoid or mitigate any likely significant effects on the River Wye.
Policy GWB12 Contributions to Community Services, Youth Provision and Recreation Facilities	Support and upkeep of existing local community facilities. Promote new development of community facilities. Increase of visitors using facilities. More activities and events Greater social mobility Potential increase in vehicular movements. Potential increase in nonphysical disturbance. Provision of youth facilities.	New community facilities. Possible vehicular movements and demand for water abstraction and treatment. Physical damage of disturbance on a localised scale. Non-physical disturbance such as noise.	River Wye (including the Lugg SAC). Wye Valley and Forest of Dean Bat Sites SAC. Wye Valley Woodlands SAC	This policy lists mitigation criteria if there are proposals to improve or add further facilities.	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. This policy supports contributions to community services, youth provision and recreation facilities through section106 and CIL.

Policy GWB13 Moors Meadow Local Green Space	Protection of identified green space. Increase in recreational activities Protection of Moors Meadow for Local Greenspace Protection of Land immediately to the south	This policy safeguards important greenspace within Goodrich and Welsh Bicknor.	River Wye (including the Lugg SAC). Wye Valley and Forest of Dean Bat Sites SAC. Wye Valley Woodlands	None. This policy acts as a mitigation measure to safeguard identified greenspace.	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. This policy will not directly lead to development. Instead it protects identified greenspace for the community of Goodrich and
Policy GWB14 Housing Development in Goodrich Village	New housing development for up to 30 houses within the designation settlement boundaries of Goodrich and Welsh Bicknor. Increase in vehicle traffic. Increased demand for water abstraction and sewage treatment. Increase in vehicular usage. Increase in nonphysical disturbance.	Depending on type, location of infrastructure. Physical damage of disturbance. Non-physical disturbance such as noise. Potential increase in visitor numbers to the parish could have an effect on the River Wye Employment and infrastructure development.	River Wye (including the Lugg SAC). Wye Valley and Forest of Dean Bat Sites SAC. Wye Valley Woodlands SAC	Good practice construction techniques include noise suppression measures; hours of operation may help to mitigate potential adverse effects during construction. Measures within Core Strategy policy SD1 should help to mitigate potential impacts relating to non-physical disturbances. Additional criteria could be added to strengthen the avoidance of locations which could have an adverse impact on the Wye Valley and Forest of Dean Bat Sites SAC. The Lesser Horseshoe Bat is known to travel 5-10km between summer and winter roosts, and is vulnerable to disturbance; light pollution; and habitat	Welsh Bicknor parish to utilise. 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. The scale and extent of such development is unlikely to be significant, as the majority of development is contained in a settlement boundaries located away from the SACs. This sustainable approach in accordance with policies SS1 and RA2 of the Core Strategy.

Policy GWB15	Three housing sites	Small scale housing	River Wye	loss. Development proposals will need to consider woodland habitat buffers and measures to minimise light pollution. Good practice construction	No. This policy will not have
Housing Sites in Goodrich Village	identified within Goodrich Village. Promotion of achieving housing target. Increased vehicle traffic Increased demand for water abstraction and sewage treatment Sustainable housing growth	Housing, infrastructure development Possible increase in recreation activities, vehicular movements and demand for water abstraction and treatment. Physical damage of disturbance on a localised scale. Non-physical disturbance such as noise.	(including the Lugg SAC). Wye Valley and Forest of Dean Bat Sites SAC. Wye Valley Woodlands SAC	techniques include noise suppression measures; hours of operation may help to mitigate potential adverse effects during construction. Measures within Core Strategy policy SD1 should help to mitigate potential impacts relating to non-physical disturbances. Additional criteria could be added to strengthen the avoidance of locations which could have an adverse impact on the Wye Valley and Forest of Dean Bat Sites SAC. The Lesser Horseshoe Bat is known to travel 5-10km between summer and winter roosts, and is vulnerable to disturbance; light pollution; and habitat loss. Development proposals will need to consider woodland habitat buffers and measures to minimise light pollution.	an impact on the River Wye sac, Wye Valley Woodlands and Wye Valley and Forest of Dean bat sites SACs. This policy would allow for small to medium scale housing schemes and supports the Core Strategy Policy RA1 and RA2.Further assessment of the sites considered can be tested at planning application stage when further details are known. There are additional policy criteria in place in both the Core Strategy and the Goodrich and Welsh Bicknor Neighbourhood Plan to avoid or mitigate any likely significant effects towards the SACs.

Policy GWB16 Meeting Housing Needs	Housing sites identified. Promotion of achieving housing target. Increased vehicle traffic Increased demand for water abstraction and sewage treatment Sustainable housing growth	Small scale housing development. Housing, infrastructure development Possible increase in recreation activities, vehicular movements and demand for water abstraction and treatment. Physical damage of disturbance on a localised scale. Non-physical disturbance such as noise.	River Wye (including the Lugg SAC). Wye Valley and Forest of Dean Bat Sites SAC. Wye Valley Woodlands SAC	Mitigation measures within this policy will help alleviate any potential detrimental impacts on the SACs.	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. This policy lists criteria for development to adhere to in order to meet housing needs of the group parish. Mitigation measures included within the policy to mitigate any undesirable impact on the existing natural and built environment.
Policy GWB17 Affordable and Intermediate Homes	Affordable and intermediate housing promoted and identified within Goodrich and Welsh Bicknor. Increased vehicle traffic Increased demand for water abstraction and sewage treatment Sustainable housing growth Mixture of people living within the group parish	Affordable and intermediate homes supported.	River Wye (including the Lugg SAC). Wye Valley and Forest of Dean Bat Sites SAC. Wye Valley Woodlands SAC	Mitigation measures within this policy will help alleviate any potential detrimental impacts on the SACs.	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. This policy lists criteria to provide affordable and intermediate housing within Goodrich and Welsh Bicknor in accordance with policy H1 and H2 of the Core Strategy. Mitigation measures included within the policy to mitigate any undesirable impact on the existing natural and built environment.

Policy GWB18	Tourism promoted within	Small scale tourism	River Wye	Good practice construction	No. It is unlikely that
Policy GWB18 Tourism Enterprises	Tourism promoted within Goodrich and Welsh Bicknor Small scale tourism facilities provided Increased vehicle traffic Increased demand for water abstraction and sewage treatment	Small scale tourism facilities developed, this may be of a seasonal basis. Physical damage of disturbance on a localised scale. Non-physical disturbance such as noise. Uncertain as to the impacts upon the River Wye SAC dependent on the location of any development. Potential increase in visitor numbers to the parish could have an effect on the River Wye Employment and infrastructure development. Possible vehicular movements and demand for water abstraction and treatment.	River Wye (including the Lugg SAC). Wye Valley and Forest of Dean Bat Sites SAC. Wye Valley Woodlands SAC	Good practice construction techniques include noise suppression measures; hours of operation may help to mitigate potential adverse effects during construction. Measures within Core Strategy policy SD1 should help to mitigate potential impacts relating to non-physical disturbances.	No. It is unlikely that tourism development will have a significant impact on the identified SACs. The criteria within this policy supports tourism based activities that does not significantly impact the surrounding environment and landscape.
Policy GWB19	Business growth	Small scale employment	River Wye	Good practice construction	No. It is unlikely that the
Scale of Economic Development	Local job growth Increase in vehicle traffic. Increased demand for	growth. Physical damage of disturbance on a localised scale.	(including the Lugg SAC). Wye Valley and Forest of	techniques include noise suppression measures; hours of operation may help to mitigate potential adverse effects during construction.	scale and nature of employment growth.

	water abstraction and sewage treatment. Increase in vehicular usage. Increase in nonphysical disturbance.	Non-physical disturbance such as noise. Uncertain as to the impacts upon the River Wye SAC dependent on the location of any development.	Dean Bat Sites SAC. Wye Valley Woodlands SAC	Measures within Core Strategy policy SD1 should help to mitigate potential impacts relating to non-physical disturbances.	
Policy GWB20 Farm Diversification	Increased demand for water abstraction and sewage treatment. Increase in vehicular usage and traffic Increase in nonphysical disturbance. Increase in business Potential job creation	Small scale employment growth. Physical damage of disturbance on a localised scale. Non-physical disturbance such as noise. Uncertain as to the impacts upon the River Wye SAC dependent on the location of any development. This can be tested at a later stage	River Wye (including the Lugg SAC). Wye Valley and Forest of Dean Bat Sites SAC. Wye Valley Woodlands SAC	Good practice construction techniques include noise suppression measures; hours of operation may help to mitigate potential adverse effects during construction. Measures within Core Strategy policy SD1 should help to mitigate potential impacts relating to non-physical disturbances.	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. This policy lists criteria to support criteria to support a range of economic activities on a farm, There is mitigation criteria within this policy to alleviate any potential impact on the surround environment that farm diversification may cause.
Policy GWB21 Working from Home	Encourage of small domestic based employment facilities. Promotion of business development Job creation in local area	Employment growth and infrastructure development Physical damage of disturbance on a localised scale. Non-physical	River Wye (including the Lugg SAC). Wye Valley and Forest of Dean Bat Sites	Mitigation measures within this policy will help alleviate any potential detrimental impacts on the SACs.	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. The scale and extent of potential employment

Site selection	Small reduction in vehicular usage.	disturbance such as noise.	SAC. Wye Valley Woodlands SAC		development is unlikely to have a significant impact on the SAC. There are sufficient policy safeguards within the NDP and Core Strategy to help avoid or mitigate any likely significant effects on the River Wye SAC. Mitigation measures are covered in policy LD2 and LD3 of the Core Strategy and policies within the Goodrich and Welsh Bicknor NDP.
Land opposite	Site allocation for up to 6	Pursuing this option	River Wye	Good practice construction	No. Housing development
Dean Swift Close	dwellings	would give greater certainty over future	(including the Lugg SAC).	techniques include noise suppression measures;	on this site is unlikely to have an impact on the
	Increase in vehicle traffic.	development within the area particularly within	Wye Valley	hours of operation may help to mitigate potential adverse	River Wye sac, Wye Valley Woodlands and Wye Valley
	Increased demand for water abstraction and	the River Wye catchment. However	and Forest of Dean Bat Sites	effects during construction.	and Forest of Dean bat sites SACs. However due
	sewage treatment.	the location of the site and impact of road noise	SAC.	Measures within Core Strategy policy SD1	to the location and proximity to a major A road,
	Increase in vehicular usage.	and traffic may prove difficult in delivering this	Wye Valley	should help to mitigate potential impacts relating	it could prove difficult in delivering this site due to
	Increase in nonphysical disturbance.	site.	Woodlands SAC	to non-physical disturbances.	pollution and noise concerns.
					This is due to the small scale and location of the
					proposed development, mitigation criteria within the
					Goodrich and Welsh Bicknor NDP and Core
					Strategy will help alleviate

					any potential impact on the SACs.
Land comprising the former Nutshell Caravan Park	Site allocation for up to 15 dwellings Increase in vehicle traffic. Increased demand for water abstraction and sewage treatment. Increase in vehicular usage. Increase in nonphysical disturbance.	Pursuing this option would give greater certainty over future development within the area particularly within the River Wye catchment. However the location of the site and impact of road noise and traffic may prove difficult in delivering this site. There are mitigation measures, such as screening and positing of houses could help deliver part of the site.	River Wye (including the Lugg SAC). Wye Valley and Forest of Dean Bat Sites SAC. Wye Valley Woodlands SAC	Good practice construction techniques include noise suppression measures; hours of operation may help to mitigate potential adverse effects during construction. Measures within Core Strategy policy SD1 should help to mitigate potential impacts relating to non-physical disturbances.	No. Housing development on this site will not have an impact on the River Wye sac, Wye Valley Woodlands and Wye Valley and Forest of Dean bat sites SACs. This is due to the scale and location of the proposed development, mitigation criteria within the Goodrich and Welsh Bicknor NDP and Core Strategy will help alleviate any potential impact on the SACs.
Land off Springfield Road north of Goodrich Manor	Site allocation for up to 9 dwellings Increase in vehicle traffic. Increased demand for water abstraction and sewage treatment. Increase in vehicular usage. Increase in nonphysical disturbance.	Pursuing this option would give greater certainty over future development within the area particularly within the River Wye catchment.	River Wye (including the Lugg SAC). Wye Valley and Forest of Dean Bat Sites SAC. Wye Valley Woodlands SAC	Good practice construction techniques include noise suppression measures; hours of operation may help to mitigate potential adverse effects during construction. Measures within Core Strategy policy SD1 should help to mitigate potential impacts relating to non-physical disturbances.	No. Housing development on this site will not have an impact on the River Wye sac, Wye Valley Woodlands and Wye Valley and Forest of Dean bat sites SACs. This is due to the small scale and location of the proposed development, mitigation criteria within the Goodrich and Welsh Bicknor NDP and Core Strategy will help alleviate any potential impact on the SACs.

HRA Consultation Feedback

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

Parish Council Name: Goodrich and Welsh Bicknor Group Parish Council

Neighbourhood Development Plan Name: Goodrich and Welsh Bicknor Group Neighbourhood Plan

Details of consultation: Regulation 14

Consultation date: 12 March to 24 April 2018

Consultation title: Goodrich and Welsh Bicknor Regulation 14 consultation

Response Date	Consultee	Summary of Comments	Response to Comments
17.04.18	Natural England	Natural England agrees with the Council's conclusion of no likely significant effect upon the named European designated site of the River Wye SAC.	Duly noted

Date: 17 April 2018 Our ref: 244407

Your ref: Goodrich & Welsh Bicknor NDP

NATURAL ENGLAND

James Latham Herefordshire Council

BY EMAIL ONLY

Hornbeam House Crewe Business Park Electra Way Crewe Cheshire CW1 6GJ

T 0300 060 3900

Dear Mr Latham,

Planning consultation: Goodrich & Welsh Bicknor Neighbourhood Plan - Draft HRA

Thank you for your consultation on the above dated 12/03/2018.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Habitats Regulations Assessment

Natural England notes the draft Habitat Regulations Assessment produced in support of this Neighbourhood plan. We agree with the Council's conclusion of no likely significant effect upon the named European designated sites:

River Wye SAC.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter <u>only</u> please contact Tom Amos on 02080 260961. For any new consultations, or to provide further information on this consultation please send your correspondences to <u>consultations@naturalengland.org.uk</u>.

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service

Yours sincerely

Tom Amos
Planning for a Better Environment
West Midlands Team

HRA Screening of Significant Changes (Policies) following examination

Parish Council Name: Goodrich and Welsh Bicknor Group

NDP Title: Goodrich and Welsh Bicknor Group Neighbourhood Plan

Date undertaken: March 2019

NDP objectives, options and policies significantly changed following Draft Plan Consultation	HRA Screening of significant changes (objectives, options and policies) following Draft Plan Consultation				
	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
Policy GWB1 Promoting Sustainable Development	Increase in water consumption. Non-physical disturbance during construction phase. Physical damage of disturbance on a localised scale. Further protection of AONB	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. The Bat sites SAC are 5.5km away from the Group Parish. Wye Valley Woodlands SAC are within the group parish.	No	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. 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.

Policy GWP44	Community facilities and	Unlikely that there will be	Divor Wyo (including the	Mo	Changes post examination clarify and environmentally enhance the policy. Therefore the previous conclusion that no requirement for an AA remains.
Policy GWB11 Protection and Enhancement of Community Facilities and Services	Community facilities and services protected and improved. Increase of visitors using facilities. More activities and events Greater social mobility Continued use of community services.	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. The Bat sites SAC are 5.5km away from the Group Parish. Wye Valley Woodlands SAC are within the group parish.	No	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. Changes post examination clarify and the policy by specifying the community facilities which are safeguarded. Therefore the previous conclusion that no requirement for an AA remains.
Policy GWB13 Moors Meadow and Church Field Local Green Space	Protection of identified green space. Increase in recreational activities Protection of Moors Meadow for	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	River Wye (including the Lugg SAC) The river runs along the boundary of the parish. Wye Valley and Forest	No	Not required. This policy will not lead to development instead it safeguards local green space in Moors Meadow and Church field as local greenspace. Changes post examination reverts

	Local Greenspace Protection of Land immediately to the south west of St Giles Church	wildlife, and SD4 which seeks to ensure water quality of the SAC is not detrimentally effected	of Dean Bat Sites SAC. The Bat sites SAC are 5.5km away from the Group Parish. Wye Valley Woodlands SAC are within the group parish.		back to the greenspace at reg 14 with part of church field being outside the allocated greenspace area. Therefore the previous conclusion that no requirement for an AA remains.
Policy GWB15 Housing Sites in Goodrich Village	Three housing sites identified within Goodrich Village. Promotion of achieving housing target. Increased vehicle traffic Increased demand for water abstraction and sewage treatment Sustainable housing growth	Small scale housing development. Housing, infrastructure development Possible increase in recreation activities, vehicular movements and demand for water abstraction and treatment. Physical damage of disturbance on a localised scale. Non-physical disturbance such as noise	River Wye (including the Lugg SAC) The river runs along the boundary of the parish. Wye Valley and Forest of Dean Bat Sites SAC. The Bat sites SAC are 5.5km away from the Group Parish. Wye Valley Woodlands SAC are within the group parish.	No	Not required. The scale and location 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. 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. Changes post examination clarify and environmentally enhance the policy. Therefore the previous conclusion that no requirement for an AA remains.

Policy	Modification recommended	Justification
GWB1	Policy GWB1 is recommended to include the following extra text to	Interests of accuracy and
	bullet point e):e) The Neighbourhood Development Plan provides the	clarity
	scope to deliver at least the minimum target of 35 dwellings over the	
	period 2011-2031 with 28 dwellings already having been built or having	
	planning permission. The sites identified provide the potential to build dwellings that will meet the needs of the local and wider community in	
	terms of size, type and tenure and are required to provide an	
	environment that offers acceptable living standards with regards to	
	potential noise nuisance and other pollution both inside and out of	
	the dwellings.	
Parish	I recommend that the Parish Policies Map indicates the location and	Interests of accuracy and
policies	boundaries of Goodrich Court, Huntsham Court and Courtfield parks	clarity
map	and gardens in order that Policy GWB4 canbe clearly understood, and	
OWE	meets the standards of clarity required by the NPPF 2012: para154.	latar at a few and a second
GWB6	The second sentence of Policy GWB6 is recommended to be replaced	Interests of accuracy and
	with the following sentence: "Where appropriate, development proposals should include the following design measures:"	clarity
GWB9	Bullet e) of Policy GWB9 to be rewritten as follows:	Interests of accuracy and
OWBS	"e) Any new street lighting is encouraged to be kept to a minimum	clarity Clarification of the
	and avoid light pollution in the immediate environment."	text and to add more
	Bullets b) and d) to use the full name for the "Herefordshire Council	detail/certainty.
	Highway Design Guide for new developments 2006".	•
GWB11	The first paragraph of Policy GWB11 to be altered as follows:	Interests of accuracy and
	Existing community facilities and public open space listed below shall	clarity
	be retained and protected from development that might restrict	D
	unnecessarily their current use unless alternative provision is made in accordance with this policy. The retention of key services will	Removal of contradictory
	be supported where possible through enabling development that would	parts.
	enhance their viability.	
	Goodrich Primary School Goodrich Village Hall	
	St Giles Church Shop and Café at Goodrich Castle	
	Cross Keys Public House Hostelrie Public House	
	Open Space recreational facilities:	
	Goodrich Cricket Pitch Goodrich Tennis Courts	
	The Goodrich Village Proposals Map to show the recreational facilities	
GWB13	at a detail that shows the boundaries of each. The Goodrich Village Proposals Map to show the boundary of the	Interests of accuracy and
GWBI3	Church Field LGS as it was in the Reg14 pre-submission version of the	clarity
	GWB-NDP: The description of the Church Field LGS at bullet b) of	Clarity
	Policy GWB13 to read:	Conformity with the Core
	b) Church Field as shown excluding an area in the SE corner of the	Strategy and NPPF.
	site The text of para 7.6 to make it clear that it is only development on	
	the excluded part of the site (Church Field) that may be considered at a	
	future date and be re-written as follows: The area of open undeveloped	
	space to the south-west of St Giles Church known as Church	
	Field allows a wide and open view of the Church for those approaching	
	the church from the road (Church Pitch) to the south. A Public Right of Way crosses the area linking Church Pitch with	
	the south-west corner of the churchyard and also makes a significant	
	contribution to the Church's setting. It is considered that the issue of any	
	future development upon the excluded part of Church Field should be	
	determined in relation to the effect on the setting of the Church and	
	the wider scenic qualities.	
GWB14	An initial sentence is to be added to Policy GWB14 as follows:	Interests of accuracy and
	"A settlement boundary is defined for Goodrich Cross and	clarity
	Goodrich Village as shown on the Village Policies Map."	
	The punctuation of Policy GWB14 is to be altered so that each bullet point is ended with a semicolon not a full stop, and bullet g) reads as	
	follows: g) Has safe vehicular access, links with the public footpath	
	network and off-street vehicle parking arrangements which should be an	
	i i i i i i i i i i i i i i i i i i i	<u> </u>

	integral part of the overall site design; and Paragraph 8.4 to end the penultimate sentence at "or curtilages". The additional phrase to be	
	deleted as follows:or curtilages.	
GWB15	Policy GWB15 to be amended as follows: The following sites identified on Goodrich Village Policies Map are proposed for development: a) Land opposite Dean Swift Close	Interests of accuracy and clarity
	amounting to around 0.4 hectares (1.0 acres) b) Land comprising the former Nutshell Caravan Park amounting to around 1.2 hectares (3.0 acres) c) Land off Springfield Road north-east of Goodrich Manor amounting to 0.4 hectares (1.0 acres)	Conformity with the Core Strategy and NPPF.
	Any proposal for development on these sites will be required to undertake a full noise and air pollution impact assessment to the satisfaction of the LPA on the proposed development and their occupants for both the internal areas of the dwellings and external space. The design and layout of development within the sites should ensure development fits sensitively into the landscape. The Meeting Housing Need and Site Assessment Report 2018 produced by the Steering Group to be referenced and introduced in the Plan at para 8.11, and available online together with the Plan. The beginning of para 8.11 in the Plan to read as follows: This NDP needs to make available land to provide a minimum of 7 new dwellings in order to achieve the outstanding number from the 35 required over the period 2011 to 2031. An assessment of sites produced by the Steering Group (Housing Need and Site Assessment Report 2018) recommended the allocation of these three sites. They are expected to achieve and somewhat	
	exceed this number should proposals be advanced based on a modest density of 15-20 dwellings per hectare	
GWB17	Policy GWB17 to be amended as follows: The first paragraph, last sentence of Policy GWB17 to identify the adjacent parishes as follows: "Should at the time of allocation there be nobody with such a connection the accommodation may be allocated to those from the	Interests of accuracy and clarity Align with the basic conditions
	adjacent parishes of Whitchurch and Ganarew; Marstow and Walford in Herefordshire and English Bicknor and Ruardean in Gloucestershire and subsequently to those within the Ross on Wye Housing Market Area. Bullet d) of Policy GWB17 to read as follows: (d) Those with an essential need to support a close relative or be supported by a current resident who is a close relative within the Group Parish.	Conformity with the Core Strategy and NPPF.
Basic Conditions Statement	I recommend that to comply with the Basic Conditions and for clarity and accuracy as required by the NPPF, the boundary of the Neighbourhood Area in the Parish Proposals Map is altered to clearly correspond with the boundary of the Group Parish.	Interests of accuracy and clarity