

Habitats Regulations Assessment

Report for:

Whitchurch & Ganarew Group Neighbourhood Area September 2019





herefordshire.gov.uk

Whitchurch and Ganarew Group HRA

HRA Screening Assessment

Contents

- 1 Introduction 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 Whitchurch and Ganarew Group Neighbourhood Plan NDP Policies Table 1 - Colour coding key for Matrix
- 6 Screening Assessments of the NDP at Reg 14, Reg 16
- 7 Conclusions from the Screening Matrix and if any 'likely significant effects'
- 8 Identification of other plans and projects, which may have 'in-combination' effects
- 9 Conclusion
- 10 Next steps

Appendix 1 – Initial Screening Report (October 2013)

Appendix 2 - List of options assessed

Appendix 3 – Full Screening matrix of submission policies and sites (March 2018)

Appendix 4- Screening of policies post 14 consultation (January 2019)

Appendix 5 – Feedback on Habitat Regulation Assessment Report consultation Reg 14 (January 2019)

Appendix 6- Feedback on the Habitat Regulation Assessment Report consultation Reg 16 (September 2019)

Appendix 7- Screening of policies post examination (September 2019)

Appendix 8- Examiners recommendations (September 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 Whitchurch and Ganarew Group Parish Council is producing a Neighbourhood Development Plan for Whitchurch and Ganarew Group Parish, in order to set out the vision, objectives and policies for the development of the Parish up to 2031. This HRA reviews the final Whitchurch and Ganarew Group Plan September 2019.
- 1.3 The NDP is a mix of criteria based policies and has allocated a site within the designated settlement boundary of Whitchurch and has three committed sites within this boundary as well. The plan has allocated a settlement boundary for Symonds Yat West. It also provides general policies that clarify and provide detail to the policies within the Herefordshire Core Strategy therefore it requires a high level screening assessment to build upon the HRA Screening Assessment Report for the Herefordshire Core Strategy. This high level screening assessment should be read in combination with the Herefordshire publication of the Local Plan-Core Strategy Habitat Regulations Assessment Report (October 2013) and ensures that there will not be any significant impacts upon Natura 2000 sites.
- 1.4 The map below shows Whitchurch and Ganarew Group Neighbourhood Area with the European Site highlighted.



2 The requirement to undertake Habitats Regulations Assessment of neighbourhood plans

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

3 Methodology

3.1 As the Whitchurch and Ganarew Group Plan is not directly connected with the management of any European sites, and includes proposals for development which may affect European sites, it is necessary under Regulation 102(1)(a) of the Habitats Regulations 2010 to undertake screening for likely significant effects on European sites.

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

4 Results of the Initial Screening Report and options

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

from these options will help to counter balance the effect of all new development within the Parish. A list of the options and site options assessed can be found in Appendix 1, and the Assessment matrix for the options can be found Appendix 2.

- 4.5 In relation to water quality, Policy SD4 of the Herefordshire Core Strategy indicates that any development should not undermine the achievement of water quality targets within the county's rivers. This should ensure that developments within the area can be accommodated within existing water discharge permits would not be likely to have a significant effect upon the River Wye SAC. This position is confirmed within the HRA of the Core Strategy in April 2015.
- 4.6 The addition of the Nutrient Management Plan for the River Wye SAC will support this policy. DCWW states there is limited capacity at Goodrich waste water treatment works within in the neighbourhood area. Therefore new development will need to adhere to the provisions of Policy SD4 of the Core Strategy. DCWW have not commented at regulation 14 regarding potential works required. In Water Cycle Study addendum it states that the Growth can potentially be accepted within permit flow limit. High STW flows were recorded 2011 & 2012 (potentially data issue) so only 2013 flow used in assessment. Future flow should be assessed to confirm if headroom available. It is recommended that liaison with the Water Company is needed before significant growth.
- 4.7 For full details of the River Wye's attributes which contribute to and define their integrity and vulnerable data see Appendix 1 of the Whitchurch and Ganarew Initial Screening Report. The Initial Screening Report, October 2013, can be found in Appendix 1 of this HRA report.
- 4.8 This information made it possible to identify the features of each site which determine site integrity, as well as the specific sensitivities of each site, therefore enabling later analysis of how the potential impacts of the Whitchurch and Ganarew Group Neighbourhood Plan may affect site integrity.
- 4.9 The initial screening assessment indicated that a full screening assessment is required to assessment the likelihood of significant effects on the River Wye (including the River Lugg) SAC of the policies within the Whitchurch and Ganarew Group NDP.

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

- 4.10 The Greater Horseshoe Bat and Lesser Horseshoe bat feature within the Wye Valley and Forest of Dean Bat Sites. The Greater Horseshoe Bat are known to migrate between 20-30km between their summer and winter roosts whereas the Lesser Horseshoe migrate 5km and 10km between their summer and winter roosts. The Lesser Horseshoe Bat is vulnerable to disturbance, noise and vibration, light pollution and habitat lost. NDPs sites within 10 km of the Wye Valley and Forest of Dean Bat Sites will need to consider development impact to these species and their habitats. NDPs closest to the Wye Valley Woodlands will need to consider: Woodland habitat buffer. Lesser Horseshoe Bat: Old buildings; woodland locations; sheltered valleys, extensive deciduous woods or dense scrub, close to roost sites. In areas of fragmented habitats, linear habitats such as hedgerows are important corridors. Vulnerable to loss or disturbance of both summer and winter roosts and removal of linear habitat.
- 4.11 The issues associated with maintaining the sites integrity include impact of development result in changes in landscape and townscape. As outlined within the Habitat Regulation Assessment to the Herefordshire Core Strategy, impact on European sites is dependent on scale and proximity to the European sites.

- 4.12 In relation to impact on biodiversity and important species, Policy LD2 of the Herefordshire Core Strategy indicates that any development should conserve, restore and enhance biodiversity and geodiversity assets of Herefordshire. Development within close proximity to internationally and local designated sites will need to incorporate sympathetic design components to enhance their nature conservation interests.
- 4.13 For full details of the Wye Valley and Forest of Dean Bat Sites attributes and Wye Valley Woodlands which contribute to and define their integrity and vulnerable data see Appendix 1 of the Whitchurch and Ganarew Initial Screening Report. The Initial Screening Report, October 2013, can be found in Appendix 1 of this HRA report.
- 4.14 This information made it possible to identify the features of each site which determine site integrity, as well as the specific sensitivities of each site, therefore enabling later analysis of how the potential impacts of the Whitchurch and Ganarew Neighbourhood Plan may affect site integrity.
- 4.15 The initial screening assessment indicated that a full screening assessment is required to assessment the likelihood of significant effects on the Wye Valley and Forest of Dean Bat Sites of the policies within the Whitchurch and Ganarew Group NDP. For full details of the Wye Valley & Forest of Dean Bat Sites SAC attributes which contribute to and define their integrity and vulnerable data see Appendix 1 of the Whitchurch and Ganarew Group Neighbourhood Plan Initial Screening Report. The Initial Screening Report, October 2013, can be found in Appendix 1 of this HRA report. This information made it possible to identify the features of each site which determine site integrity, as well as the specific sensitivities of each site, therefore enabling later analysis of how the potential impacts of the Whitchurch and Ganarew Group Neighbourhood Plan may affect site integrity.
- 4.16 The initial options for the NDP were assessed to determine their environmental impact that could affect the Wye Valley & Forest of Dean Bat Sites SAC. Overall the majority of the options proposing any growth appear to depend on location and scale in relation to environmental impact.
- 4.17 As the Whitchurch and Ganarew Group Neighbourhood Plan progresses from options onto their NDP policies, the Plan will need to identify ways in which the Whitchurch and Ganarew Group NDP effect on the Wye Valley & Forest of Dean Bat Sites SAC could be achieved, alongside taking forward the preferred options from the consultation from the community. If a majority of these options are taken forward either as standalone policies or in combination with other policies then the mitigation from these options will help to counter balance the effect of all new development within the Parish. A list of the options and site options assessed can be found in Appendix 2.

5 Description of the Whitchurch and Ganarew Plan Neighbourhood Plan

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

Housing Opportunities for Employment Environmental Sustainability Roads and Traffic

Community Service and Facilities

- 5.3 The NDP also sets out 23 policies on various topics based on the objective headings above and also for the village, these include:
 - Policy WG1 Promoting Sustainable Development
 - Policy WG2 Development Strategy
 - Policy WG3 Housing Development in Whitchurch
 - Policy WG4 Housing Sites in Whitchurch
 - Policy WG5 Housing Development in Symonds Yat West
 - Policy WG6 Affordable and intermediate Homes
 - Policy WG7 Housing Design and Appearance
 - Policy WG8 Sustainable design
 - Policy WG9 Land adjacent to the River Wye to the east of Whitchurch
 - Policy WG10 Stoney Hills Industrial Estate and the complex of industrial and commercial buildings between
 the Old Ross Road and The Old Forge
 - Policy WG11 Use of Rural Buildings
 - Policy WG12 Working from Home
 - Policy WG13 Poly-tunnel Policy
 - Policy WG14 Conserving the landscape and scenic beauty, both within and outside the Wye Valley AONB
 - Policy WG15 Enhancement of the natural environment
 - Policy WG16 Protecting heritage assets
 - Policy WG17 Protection from flood risk
 - Policy WG18 Sewerage infrastructure
 - Policy WG19 Renewable and low carbon energy
 - Policy WG20 Traffic measures within the parish Deleted at examiantion
 - Policy WG20 Highway design requirements
 - Policy WG21 Protection and enhancement of Parish facilities and services
 - Policy WG22 Contributions to Parish Services, youth provision and recreation facilities
 - Policy WG23 Broadband infrastructure
- 5.4 The NDP proposes that the following sites in Whitchurch to be allocated for housing, in order to facilitate the proportional growth envisaged by Policy RA2 of the Local Plan (Core Strategy):

Site opposite Yew Tree Close

Total capacity of 9 dwellings.

6 Assessments undertaken to date of the emerging Whitchurch and Ganarew NDP policies

6.1 Regulation 102 of the Habitats Regulations 2010 requires that a Screening Assessment be undertaken, in order to identify the 'likely significant effects' of an NDP. Accordingly, a screening matrix was prepared and this determined the extent to which any of the policies within the Whitchurch and Ganarew NDP would be likely to have a significant effect on the River Wye SAC, Wye Valleys Woodlands SAC and Wye Valley and Forest of Dean bat sites. This has been repeated at each statutory stage of the NDP consultation process.

Screening of the draft plan (Reg14)

6.3 The screening matrix took the approach of screening each policy and objective individually, which is consistent with current guidance. The results from the HRA reports for the Herefordshire Local Plan (Core Strategy) were also taken into consideration.

- 6.4 None of the Whitchurch and Ganarew NDP objectives and policies (January 2019) were concluded to be likely to have a significant effect on the European sites. The group parish itself does not have the River Wye SAC in the parish, however it is in the hydrological catchment and the river runs along its southern boundary. The settlement of Whitchurch and site allocation is not in close proximity to the river and unlikely to have a direct significant impact on the SAC. Core Strategy policy SD3 and SD4 together will the Nutrient Management Plan will ensure that development can only occur if these policy requirements are met.
- 6.5 In many cases this is because the policies themselves would not result in development, i.e. they related instead to criteria for development and the SAC itself is not within the parish. In several cases the policies also included measures to help support the natural environment including biodiversity.
- 6.6 It is unlikely that the Whitchurch and Ganarew Group Neighbourhood Plan will have any in-combination effects with any Plans from neighbouring parish council due to the level of growth proposed is of the same that is proposed for the Ross on Wye Market Area in the Herefordshire Core Strategy.
- 6.7 Therefore it was concluded that the Submission Whitchurch and Ganarew NDP would not have a likely significant effect on the River Wye (including the River Lugg) SAC, Wye Valley Woodlands and Wye Valley and Forest of Dean Bat sites SAC.

Screening of modifications to NDP (Reg16)

- 6.8 The Submission NDP (January 2019) incorporates additional policy criteria or wording to add clarity and emphasis throughout the document. Policy which was amended and identified community areas to protect. Policy WG18 reference to the sewerage network capacity within the village and the potential to phase development. This will give criteria for future applications to meet to support policy SD4 and ensure that the delivery of the Nutrient Management Plan is not compromised.
- 6.9 Modifications made to 3 other policies of the plan are considered to be minor and would not have a significant effect on the results previously assessed. These were points of clarity and minor word changes.
- 6.10 The revised NDP policies are therefore unlikely to result in significant effects on the European site. Conservation status of the SAC in respect of phosphate levels as soon as possible and at the latest by 2027, have both been considered as part of the in-combination assessment.

7 Assessment of the 'likely significant effects' of the submission Whitchurch and Ganarew NDP following examination) September 2019) and implications of *Sweetman* case

- 7.1 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.
- 7.2 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. Policy WG20 has been deleted as it was not considered a land use policy. 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 WG8, WG9, WG11 and WG13.These have been rescreened and results have found that none of these

policies require an appropriate assessment. The changes have clarified and enhance these polices, helping them appropriately align with strategic policy.

- 7.3 In light of the *Sweetman* case all policies have been reviewed to ensure compliance with the ruling at examination. The finding can be found in appendix 6.
- 7.4 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

7.4 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.

8 Conclusions from the Screening Matrix

- 8.1 None of the Draft Whitchurch and Ganarew Neighbourhood Plan (March 2018) policies and sites were concluded to be likely to have a significant effect on the Wye Valley Woodlands SAC, Wye Valley Forest of Dean Bat sites SAC and the River Wye (including the Lugg) SAC.
- 8.2 This is party down to scale and extent of plan also the Whitchurch and Ganarew Plan small scale site allocation. For the policies contained in the plan there is sufficient policy criteria in Core Strategy policies LD2, SD3 and SD4 to ensure that development can only occur if these criteria are met.
- 8.3 The plan allocates settlement boundaries for Whitchurch and Symonds Yat West and 1 site for development within the settlement Whitchurch to accommodate 9 dwellings. Within the settlement area there appears to be enough capacity within the two identified settlements along with the completions and commitments to meet the target housing growth.
- 8.4 The initial Call for Sites had 33 dwellings throughout 2016 and 2017, these were eventually whittled down to 7 options. These options have been screened in the HRA options screening and have found 2 out of the seven likely to have an effect and the 5 site unlikely to have an effect on the SACs.
- 8.5 The one sites for development of up to 9 dwellings, along with development from 41 commitments, 25 completions this already meets the housing target of 65 from 2011 to 2031.Commitments and completions from April 2011-April 2018 are currently 66 dwellings, leaving a residual figure of -1 to find within the parish of Whitchurch and Ganarew.
- 8.5 There is limited capacity at Goodrich waste water treatment works within in the neighbourhood area. Therefore new development will need to adhere to the provisions of Policy SD4 of the Core Strategy. In Water Cycle Study addendum it states that the Growth can potentially be accepted within permit flow limit. It is recommended that liaison with the Water Company is needed before significant growth takes place.
- 8.6 In addition, the Nutrient Management Plan for the River Wye SAC should ensure that development within Herefordshire which can be accommodated within existing water discharge permits would not be likely to have a significant effect upon the River Wye SAC.

- 8.7 No mitigation measures have been included within the screening of the policies of the NDP. Policies of the Core Strategy and the NDP will form part of the development plans. A key requirement of the Core Strategy is to meet the Water Framework Directive.
- 8.8 Policy SD4 of the Core Strategy of the NDP indicate that development would not permitted if wastewater treatment and water quality cannot be assured.
- 8.9 Policy LD2 of the Core Strategy indicates that any development should conserve, restore and enhance biodiversity and geodiversity assets of Herefordshire. Development within close proximity to internationally and local designated sites will need to incorporate sympathetic design components to enhance their nature conservation interests. Whitchurch and Ganarew Neighbourhood 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 Whitchurch and Ganarew Group 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 Llangarron, Welsh Newton and Llanrothal and Goodrich and Welsh Bicknor both and are in the process of producing a neighbourhood plan. These plans have not gone over and beyond the requirements set out within the Core Strategy for their area. Marstow are not doing a NDP. The Parish borders with Gloucestershire and Monmouthshire, no known NDPs are bordering the Parish for these areas.
- 9.4 The HRA for the Core Strategy also identifies that both the Water Cycle Study for Herefordshire, which indicates the potential for planned water abstraction requirements combined with pressures on European Sites from the Core Strategy policies, and the work on the Nutrient Management Plan, to ensure the favourable conservation status of the SAC in respect of phosphate levels as soon as possible and at the latest by 2027, have both been considered as part of the in-combination assessment.
- 9.5 It is unlikely that the Whitchurch and Ganarew Group Neighbourhood Plan will have any in-combination effects with any plans from neighbouring parish councils as the level of growth proposed is the same as that proposed for the Ross on Wye Housing Market Area in the Herefordshire Core Strategy.

10.0 Conclusion

- 10.1 With reference to sections 6 to 9 above, the modifications to the NDP are not considered to affect the findings of the previous HRA report. Equally the review in light of the *Sweetman* case is also not considered to affect the previous findings.
- 10.2 Therefore the earlier conclusions that the Whitchurch and Ganarew Group 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 Whitchurch and Ganarew Group 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 Whitchurch and Ganarew Group NDP.

Appendix 1

Whitchurch and Ganarew Group Options

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

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

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

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

Site Options

Appendix 2

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

Parish Council Name: Whitchurch and Ganarew

NDP Title: Whitchurch and Ganarew Neighbourhood Plan

Date undertaken: March 2018

NDP objectives, Site options policies	HRA Screening of Emerging NDP objectives, options and policies				
	Likely activities (operations) to result as a consequence of the objective/option/policy	Likely effect if option implemented. Could they have Likely Significant Effects (LSE) on European Sites? (Yes/No, with reasons)	European Sites potentially affected	Mitigation measures to be considered, as necessary, through redraft of objective/option/policy and to be considered as part of Appropriate Assessment	If recommendations are implemented, would it be possible that it would result in no LSE? (Yes/No with reasons)
Option1-Not to prepare a Neighbourhood Plan but to rely on Herefordshire's Core Strategy, accept pressures from housing developers and any Rural Areas Local Plan that Herefordshire Council might produce.	No NDP to determine planning applications. Rely on Local Plan policies Less certainty of where the 4.14 and 4.15 identified settlements start and stop.	Criteria policies within the Core Strategy would guide further development. Specific policies and proposals for the parish would not exist.	River Wye (including the Lugg SAC). Wye Valley and Forest of Dean Bat Sites SAC. Wye Valley Woodlands SAC	N/A	N/A

Option 2- Limiting housing growth to that needed to meet the Herefordshire Local Plan Core Strategy requirements to sites already committed and sensitive infilling within defined settlement boundaries for Whitchurch and Symonds Yat West.	The designation of a settlement boundary will give additional certainty and help define those areas considered as the built form and open countryside. This can aid the direction of further growth to maintain the quality of the landscape and surroundings.	Any settlement boundary would need to be designated to ensure that sufficient capacity was included to permit the proportional growth requirements within Policy RA2 of the Core Strategy. Criteria would need to be included within the policy to safeguard against any likely effects.	River Wye (including the Lugg SAC). Wye Valley and Forest of Dean Bat Sites SAC. Wye Valley Woodlands SAC	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.	No; policy criteria can be added to any settlement boundary criteria policy to mitigate. The majority of the identified settlements of Whitchurch and Symonds Yat West, where likely settlement boundary would be drawn is within the catchment area for the River Wye. Criteria within the Local Plan Core Strategy and NDP can determine where the sites go.
Option 3-In addition to Option 2, identifying a number of small sites (i.e. sites of up to 5 - 10 dwellings) that would be in keeping with the scale of development for the settlement boundary of Whitchurch.	Allocation of sites for housing or other uses would give certainty to future development. Specific environmental issues could be investigated during the site search and be positively addressed within the policy wording. The designation of a settlement boundary will give additional certainty and help define those areas considered as the built form	Pursuing this option would give greater certainty over future development within the area particularly within the River Wye catchment. If required mitigation criteria can be added to site allocations policies. However the majority of the village where proportional growth and the settlement boundary are likely to be located are outside of the River	River Wye (including the Lugg SAC). Wye Valley and Forest of Dean Bat Sites SAC. Wye Valley Woodlands SAC	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.	No; policy criteria can be added to any allocation policy to mitigate. The majority of the identified settlements of Whitchurch and Symonds Yat West, where likely settlement boundary would be drawn is within the catchment area for the River Wye. Criteria within the Local Plan Core Strategy and NDP can determine

	and open countryside	Wye catchment area.			where the sites go
Option 4- In addition to Option 2, identifying a mix of very small, small and medium-sized sites in Whitchurch that would be in keeping with the scale of development for the settlement boundary of Whitchurch and that would provide up to 65 new dwellings.	Allocation of sites for housing or other uses would give certainty to future development. Specific environmental issues could be investigated during the site search and be positively addressed within the policy wording. The designation of a settlement boundary will give additional certainty and help define those areas considered as the built form and open countryside	Pursuing this option would give greater certainty over future development within the area particularly within the River Wye catchment. If required mitigation criteria can be added to site allocations policies. However the majority of the village where proportional growth and the settlement boundary are likely to be located are outside of the River Wye catchment area.	River Wye (including the Lugg SAC). Wye Valley and Forest of Dean Bat Sites SAC. Wye Valley Woodlands SAC	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.	No; policy criteria can be added to any allocation policy to mitigate. The majority of the identified settlements of Whitchurch and Symonds Yat West, where likely settlement boundary would be drawn is within the catchment area for the River Wye. Criteria within the Local Plan Core Strategy and NDP can determine where the sites go
Site Options					
Site option 4- Pump house Washings Lane 0.1ha	Very small scale housing development Demand in water supply. Increase in vehicular traffic. Allocation of sites would give added certainty to housing delivery. Non physical disturbance	This option location is in very close proximity to the River Wye and is likely to have an impact on the River Wye SAC.	River Wye (including the Lugg SAC). Wye Valley and Forest of Dean Bat Sites SAC. Wye Valley Woodlands SAC	Policy would need to take account of the proportional growth requirements of the Core Strategy and potential headroom capacity at the local STW. Developments should not be within 100m of the designated bank. Some developments beyond 100m may also have	Yes; Although the site is very small in scale, the location of the house is likely to have an impact on the River Wye SAC.

	noise and light pollution. Demand in broadband and communication services.			impacts based on proximity and these issues should be addressed where possible when developing NDP policy and choosing site allocations.	
Site option 6- Ridgeway Crescent 0.03ha	Very small housing developed. Demand in water supply. Increase in vehicular traffic. Allocation of sites would give added certainty to housing delivery. Non physical disturbance noise and light pollution. Demand in broadband and communication services.	Pursuing this option would give greater certainty over future development within the area particularly within the River Wye catchment. If required mitigation criteria can be added to site allocations policies. However the majority of the village where proportional growth and the settlement boundary are likely to be located are outside of the River Wye catchment area.	River Wye (including the Lugg SAC). Wye Valley and Forest of Dean Bat Sites SAC. Wye Valley Woodlands SAC	Policy would need to take account of the proportional growth requirements of the Core Strategy and potential headroom capacity at the local STW. 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.	No; policy criteria can be added to any allocation policy to mitigate. The majority of the village, where likely proportionate growth and settlement boundary would be located is outside of the catchment area for the River Wye.
Site option 19- Erwarton, Washings Lane 0.04ha	Very small scale housing development Demand in water supply.	This option location is in very close proximity to the River Wye and is likely to have an impact on the River Wye SAC.	River Wye (including the Lugg SAC). Wye Valley and Forest of Dean Bat Sites SAC.	Policy would need to take account of the proportional growth requirements of the Core Strategy and potential headroom capacity at the	Yes; Although the site is very small in scale, the location of the house is likely to have an impact on the River Wye SAC.

	Increase in vehicular traffic. Allocation of sites would give added certainty to housing delivery. Non physical disturbance noise and light pollution. Demand in broadband and communication services.		Wye Valley Woodlands SAC	local STW. 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.	
Site option 24- Old Court Barns 0.4ha SELECTED	Small scale development of 6 houses. Demand in water supply. Increase in vehicular traffic. Allocation of sites would give added certainty to housing delivery. Non physical disturbance noise and light pollution. Demand in broadband and communication services.	Due to the scale and proximity of the location to the SAC site it is unlikely that there will be significant effects on the European Site.	River Wye (including the Lugg SAC). Wye Valley and Forest of Dean Bat Sites SAC. Wye Valley Woodlands SAC	There are sufficient safeguards within other policies to avoid any adverse impacts, and the inclusion of additional policy wording in the NDP. This site identified falls within an area which is identified as an area for proportionate growth.	No. The scale, location and extent of development on this site is unlikely to have a significant impact on the SAC in accordance Core Strategy policies RA1 and RA2.

Site option 31b- Llangrove Road 2.0ha SELECTED	Small scale development of 6 houses. Demand in water supply. Increase in vehicular traffic. Allocation of sites would give added certainty to housing delivery. Non physical disturbance noise and light pollution. Demand in broadband and communication services.	Due to the scale and proximity of the location to the SAC site it is unlikely that there will be significant effects on the European Site.	River Wye (including the Lugg SAC). Wye Valley and Forest of Dean Bat Sites SAC. Wye Valley Woodlands SAC	There are sufficient safeguards within other policies to avoid any adverse impacts, and the inclusion of additional policy wording in the NDP. This site identified falls within an area which is identified as an area for proportionate growth.	No. The scale, location and extent of development on this site is unlikely to have a significant impact on the SAC in accordance Core Strategy policies RA1 and RA2.
Site option 32- Old Court hotel 0.05ha	Very small scale housing. Demand in water supply. Increase in vehicular traffic. Allocation of sites would give added certainty to housing delivery. Non physical disturbance noise and light pollution. Demand in broadband and communication services.	Pursuing this option would give greater certainty over future development within the area particularly within the River Wye catchment. If required mitigation criteria can be added to site allocations policies. However the majority of the village where proportional growth and the settlement boundary are likely to be located are outside of the River	River Wye (including the Lugg SAC). Wye Valley and Forest of Dean Bat Sites SAC. Wye Valley Woodlands SAC	Policy would need to take account of the proportional growth requirements of the Core Strategy and potential headroom capacity at the local STW. 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	No. The scale and extent of development on this site is unlikely to have a significant impact on the SAC in accordance Core Strategy policies RA1 and RA2.

Bakery Old Monmouth Road 0.2ha All giv ho De De	lousing developed Demand in water supply. Increase in vehicular traffic. Illocation of sites would ive added certainty to ousing delivery. Ion physical disturbance oise and light pollution. Demand in broadband and ommunication services.	Wye catchment area. Pursuing this option would give greater certainty over future development within the area particularly within the River Wye catchment. If required mitigation criteria can be added to site allocations policies. However the majority of the village where proportional growth and the settlement boundary are likely to be located are outside of the River Wye catchment area.	River Wye (including the Lugg SAC). Wye Valley and Forest of Dean Bat Sites SAC. Wye Valley Woodlands SAC	and choosing site allocations. 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.	No; policy criteria can be added to any allocation policy to mitigate. The majority of the village, where likely proportionate growth and settlement boundary would be located is outside of the catchment area for the River Wye.
--	---	---	--	--	--

Appendix 3

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

Parish Council Name: Whitchurch and Ganarew Group Parish Council

NDP Title: Whitchurch and Ganarew Group Draft Plan reg 14

Date undertaken: March 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?)
Objectives			I	I	
Objective 1- Housing	Objectives will encourage housing growth within the identified settlement boundaries. Objectives will encourage small scale housing proposals within Whitchurch and Ganarew to fit in keeping with the existing landscape character.	This objective supports appropriate development within the identified settlement boundaries. This is dependent on where location, scale and nature of the sites. This can be determined further at site allocation stage.	River Wye (including the Lugg SAC). Wye Valley and Forest of Dean Bat Sites SAC. Wye Valley Woodlands SAC	Policy criteria will need to include proximity of the River Wye, Wye Valley and Forest of Dean Bat Sites. Mitigation measures are likely to be included within the policies of the plan.	No. This will not have an impact on the River Wye sac, Wye Valley Woodlands and Wye Valley and Forest of Dean bat sites SACs. This objective seeks to encourage appropriate development to be in keeping with the existing settlements.
	Objective to support the				

Objective 2- Opportunities for Employment	delivery of proportionate growth in line with the Local Plan (Core Strategy) Policy RA1/RA2. Local jobs growth. Encourage local people to work closer to their work. Plan attracts employment opportunities in the rural area. Encouragement of small scale business development .Job creation. Support of tourism, hospitality and rural diversification.	This is dependent on where location, scale and nature of the sites. This can be determined further at site allocation stage.	River Wye (including the Lugg SAC). Wye Valley and Forest of Dean Bat Sites SAC. Wye Valley Woodlands SAC	Objective and policies within the NDP and Core Strategy will help mitigate impact caused from employment growth. Promotion of sustainable construction methods should be encouraged.	No. This will not have an impact on the River Wye sac, Wye Valley Woodlands and Wye Valley and Forest of Dean bat sites SACs. This objective strives to improve and sustain existing employment areas and support new businesses within Whitchurch and Ganarew Parish.
Objective 3- Environmental sustainability	Protect And enhance the existing natural environment, landscape and views. Reduce Flood risk Carbon reduction	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 itself acts as a mitigation measure, this will help safeguard against unsuitable development in Whitchurch and Ganarew.	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 Whitchurch and Ganarew.

Objective 4- Roads and Traffic	Promotion of safer roads. Improvements to public transport. Increase of sustainable transport usage. Improvements of footpaths, cycle ways and bridleways.	None identified. This objective strives to reduce adverse effects of vehicular usage.	River Wye (including the Lugg SAC). Wye Valley and Forest of Dean Bat Sites SAC. Wye Valley Woodlands SAC	None. This objective is a mitigation measure in itself.	No. This will not have an impact on the River Wye sac, Wye Valley Woodlands and Wye Valley and Forest of Dean bat sites SACs. This objective promotes safer and more sustainable travel through new development.
Objective 5- Community Service and Facilities	Safeguard existing community faculties Enhance existing facilities Protect and enhance existing greenspace. Support community spirit Community projects Promotion of a friendly and safe area	Protection of community assets including the village hall.	River Wye (including the Lugg SAC). Wye Valley and Forest of Dean Bat Sites SAC. Wye Valley Woodlands SAC	None. This objective is a mitigation measure in itself.	No. This will not have an impact on the River Wye sac, Wye Valley Woodlands and Wye Valley and Forest of Dean bat sites SACs. This objective seeks to safeguard public open space and protect the village hall for the community.
Policies		L			
Policy WG1- Promoting Sustainable Development	Promoting sustainable development. New housing allocated in selected sites Increase in water	Small scale housing development. Housing, infrastructure development Possible increase in recreation activities, vehicular movements	River Wye (including the Lugg SAC). Wye Valley and Forest of Dean	Good practice construction techniques include noise suppression measures; hours of operation may help to mitigate potential adverse effects during construction.	No. This policy promotes sustainable development and will not have an impact on the River Wye SAC, Wye Valley Woodlands and Wye Valley and Forest of Dean bat sites SACs.

	consumption. Non-physical disturbance during construction phase. Physical damage of disturbance on a localised scale.	and demand for water abstraction and treatment. Physical damage of disturbance on a localised scale. Non-physical disturbance such as noise.	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 WG2 Development Strategy	New housing allocated in selected sites Increase in water consumption. Non-physical disturbance during construction phase. Physical damage of disturbance on a localised scale.	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	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. 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.
Policy WG3 Housing Development in Whitchurch	New housing development within the designation settlement boundaries of Whitchurch and Ganarew . Increase in vehicle traffic. Increased demand for water abstraction and	Depending on type, location of infrastructure. Physical damage of disturbance. Non-physical disturbance such as	River Wye (including the Lugg SAC). Wye Valley and Forest of Dean Bat Sites SAC.	Good practice construction techniques include noise suppression measures; hours of operation may help to mitigate potential adverse effects during construction. Measures within Core	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

	sewage treatment.	noise.	Wye Valley Woodlands SAC	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,	development is contained in a sustainable approach in accordance with policies SS1 and RA2 of the Core Strategy.
				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.	
Policy WG4 Housing development in Whitchurch	New housing on 2 sites for up to 12 dwellings in the identified settlement boundary of Whitchurch. Increase in water consumption. Non-physical disturbance during construction phase. Physical damage of disturbance on a localised scale.	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	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. 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 to the NDP in terms of meeting their housing

DeliauWQE		localised scale. Non-physical disturbance such as noise.	DiscoMer	Quadramatica	target.
Policy WG5 Housing Development in Symonds Yat West	New housing development within the designation settlement boundaries in Symonds Yat West. Increase in vehicle traffic. Increased demand for water abstraction and sewage treatment. Increase in water consumption. Non-physical disturbance during construction phase.	Depending on type, location of infrastructure. Physical damage of disturbance. Non-physical disturbance such as noise. 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. 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.	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 development is contained in a sustainable approach in accordance with policies SS1 and RA2 of the Core Strategy.

Policy WG6 Affordable and intermediate Homes	Meeting housing needs in the group parish Small increase in affordable and intermediate homes being built in the group parish.	Depending on type, location of infrastructure. Physical damage of disturbance. Non-physical disturbance such as noise. 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. 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 WG7 Housing Design and Appearance	New development is in keeping with local environment Innovative and high quality design of new development Local environment retained and preserved. Sets out design criteria for development to adhere to.	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	The policy will help safeguard against unsuitable development in Whitchurch and Ganarew.	No. This policy will not directly lead to development, instead it encourages fitting and environmentally supportive design to Whitchurch and Ganarew. Overall this is unlikely to have an impact on the River Wye sac, Wye Valley Woodlands and Wye Valley and Forest of Dean bat sites SACs.
Policy WG8 Sustainable Design	Sets out design criteria for development to adhere to. The built character is protected along with landscape character. New development is in keeping with local	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	The policy will help safeguard against unsuitable development in Whitchurch and Ganarew.	No. This policy will not have an impact on the River Wye sac, Wye Valley Woodlands and Wye Valley and Forest of Dean bat sites SACs. No this policy will not directly lead to development. Instead it, aims to encourage suitable designed developments to be in keeping with the

	environment Promotion of sustainable design. Sustainable development encouraged.		Woodlands SAC		vernacular of Whitchurch and Ganarew.
Policy WG9 Land adjacent to the River Wye to the east of Whitchurch	Tourism growth Support accommodation tourism facilities within the land adjacent to the River Wye and east of Whitchurch. Increase in vehicular traffic Further safeguards added to ensure development will not have a significant impact on the River Wye SAC. Farm diversification Regenerative projects to increase tourism	Physical damage of disturbance. Non-physical disturbance such as noise. Increase in seasonal traffic of people and vehicles Possible 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	The implementation of Core Strategy policies SD3 and SD4 should also help to avoid any adverse impacts in relation to the hydrological regimes at the River Wye. The implementation of the Nutrient Management Plan will specifically address issues relating to water quality in the River Wye. The Core Strategy policy LD2 will aim to help avoid any adverse impacts on the River Wye for new employment or businesses uses. 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. The scale and extent of potential employment 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 Whitchurch and Ganarew NDP.
Policy WG10 Stoney Hills Industrial Estate and the complex of industrial and commercial buildings between the Old Ross	Retained and enhanced employment sites. Potential construction traffic	Physical damage of disturbance. Non-physical disturbance such as	River Wye (including the Lugg SAC). Wye Valley and	Good practice construction techniques include noise suppression measures; hours of operation may help to mitigate potential	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.

Road and The Old Forge	and noise. Job creation Intensification and enhancement of current business premises Encourage of small domestic based employment facilities. Promotion of business development Job creation in local area Small reduction in vehicular usage.	noise. Possible vehicular movements and demand for water abstraction and treatment.	Forest of Dean Bat Sites SAC. Wye Valley Woodlands SAC	adverse effects during construction. Measures within Core Strategy policy SD1 should help to mitigate potential impacts relating to non-physical disturbances.	The scale and extent of potential employment 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 Whitchurch and Ganarew NDP.
Policy WG11 Use of Rural Buildings	Sustainable re use of agricultural buildings. Small scale development Live / work units supported Nonphysical disturbance caused from construction. Use of suitable materials in keeping with traditional materials used in rural buildings.	Physical damage of disturbance. Non-physical disturbance such as noise. Possible minor scale 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 the policy will not have an impact on the River Wye sac, Wye Valley Woodlands and Wye Valley and Forest of Dean bat sites SACs. The scale and extent of conversion of agricultural building is likely to be minimal, therefore is unlikely to have a significant impact on the SACs. There are sufficient policy safeguards within the Core Strategy and Whitchurch and Ganarew NDP to safeguard and where necessary mitigate detrimental impact

					caused from development towards the SACs.
Policy WG12 Working from home	Encourage of small domestic based employment facilities. Promotion of business development Job creation in local area Small reduction in vehicular usage / commuter traffic	Employment growth and infrastructure development 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	The implementation of Core Strategy policies SD3 and SD4 should also help to avoid any adverse impacts in relation to the hydrological regimes at the River Wye. The implementation of the Nutrient Management Plan will specifically address issues relating to water quality in the River Wye. The Core Strategy policy LD2 will aim to help avoid any adverse impacts on the River Wye for new employment or businesses uses. Measures within Core Strategy policy SD1 should help to mitigate potential impacts relating to non- physical disturbances.	No. It is unlikely that the policy will not have an impact on the River Wye sac, Wye Valley Woodlands and Wye Valley and Forest of Dean bat sites SACs. The scale and extent of potential employment 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 Whitchurch and Ganarew NDP.
Policy WG13 Poly- tunnel policy	Appropriate poly tunnel development Rural business development	Unlikely that there will have a significant effect on the European Site. This policy itself is likely to mitigate the impact caused from	River Wye (including the Lugg SAC). Wye Valley and	None. This policy acts as a mitigation measure to ensure large agricultural development is fitting for its context and ensures protection to the exiting	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.

	Noise, odour and smell minimised. Unobtrusive lighting on new schemes.	development. Protection criteria for the AONB has been added to alleviate potential landscape impact.	Forest of Dean Bat Sites SAC. Wye Valley Woodlands SAC	landscape.	It is unlikely that the scale of proposed rural business development is unlikely to have a significant impact on the baseline data.
Policy WG14 Conserving the landscape and scenic beauty, both within and outside the Wye Valley AONB	Safeguard existing landscape against inappropriate development. Encouragement of sustainable development which preserves and protects the landscape, environment and habitats.	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	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 is protected against inappropriate development. 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.
Policy WG15 Enhancement of the natural environment	Protection and enhancement of the natural environment. Encouragement of	This policy itself is likely to mitigate the impact caused from development.	River Wye (including the Lugg SAC).	None. This policy acts as a mitigation measure to ensure environmental protection and enhancement in	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

	sustainable development which preserves and protects the landscape, environment and habitats. Physical damage of disturbance on a localised scale. Non-physical disturbance such as noise. Possible vehicular movements and demand for water abstraction and treatment.		Wye Valley and Forest of Dean Bat Sites SAC. Wye Valley Woodlands SAC	Whitchurch and Ganarew.	policy ensures existing landscape is protected against inappropriate 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, River Wye SAC and Forest of Dean bat sites SAC.
Policy WG16 Protecting Heritage assets	Sustainable re use of agricultural buildings. Sustainable development encouraged within the identified settlements. Minimal increase demand for water abstraction and sewage treatment Sustainable housing growth	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	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 Wooflands and Wye Valley and Forest of Dean bat sites SACs. The scale and extent of conversion of agricultural building is likely to be minimal, therefore is unlikely to have a significant impact on the SACs. There are sufficient policy safeguards within the Core Strategy and Whitchurch and Ganarew NDP to safeguard and where necessary mitigate detrimental impact caused from development towards the SACs.

Policy WG17 Protection from flood risk	Strive to reduce impact of flooding within Whitchurch and Ganarew. New development designed to appropriately reduce flood risk. Sustainable design promoted. Infrastructure development phased in line with infrastructure works within the plan period.	This policy will help to safeguard against flooding from foul and storm drainage.	River Wye (including the Lugg SAC). Wye Valley and Forest of Dean Bat Sites SAC. Wye Valley Woodlands SAC	None. This policy acts as a mitigation measures to ensure new developments avoid and alleviate flooding impacts in Whitchurch and Ganarew.	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 development in Whitchurch and Ganarew is safeguarded against flooding. Also that the infrastructure will have enough capacity for any planned development. There are sufficient policy safeguards within the NDP and Core Strategy to help avoid or mitigate any likely significant effects on the Wye Valley and Forest of Dean bat sites SACs.
Policy WG18 Sewerage infrastructure	Reduce impact of flooding and storm water flooding within Whitchurch and Ganarew. Sustainable design promoted. Infrastructure development phased in line with infrastructure works within the plan period.	This policy will help to safeguard against flooding from foul and storm drainage along with identifying sewerage treatment works in line with WwTWs.	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 measures to ensure new developments avoid and alleviate flooding and support impacts in Whitchurch and Ganarew.	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 development in Whitchurch and Ganarew is safeguarded against flooding and there is sufficient capacity in the WwTws. Also that the infrastructure will have enough capacity for any planned development.
Policy WG19 Renewable and low carbon energy	Support for renewable and low carbon energy	This policy supports renewable energy schemes and low	River Wye (including the	Mitigation measures within the NDP and Core Strategy can help alleviate and	No. This policy will not have an impact on the River Wye sac, Wye Valley Woodlands

	proposals Development of renewable energy schemes on a domestic scale Support community and local businesses renewable energy schemes and low carbon proposals Reduction on carbon based energy usage in the long term	carbon energy schemes. This is unlikely to have a significant impact on the SACs.	Lugg SAC). Wye Valley and Forest of Dean Bat Sites SAC. Wye Valley Woodlands SAC	mitigate un desirable impact caused during the construction process.	and Wye Valley and Forest of Dean bat sites SACs. This policy ensures suitable community energy projects will have minimal environmental impact. Therefore is unlikely to impact on the SACs.
Policy WG20 Traffic measures within the parish	 Promotion of safer roads. Improved sustainable modes of transport such as cycling, walking, and public transport links. Increase in walking and cycling. Decrease in traffic accidents. Development of transport infrastructure Traffic Calming measures Improvement of road safety 	Any effects of additional transport will be mitigated with providing additional highway and transport measures.	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 will 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 could lead to some small scale sustainable transport links and predominately within areas outside of the hydrological catchment of the River Wye. Additional policy safeguards exist within the Core Strategy to mitigate any potential likely significant effects.
Policy WG21 Highway design requirements	Sets out criteria for highway design. Sustainable development	This policy itself is likely to mitigate the impact caused from	River Wye (including the Lugg SAC).	None. This policy acts as a mitigation measure to ensure new development will promote road safety.	No. This policy will not have an impact on the River Wye sac, Wye Valley Woodlands and Wye Valley and Forest

	encouraged.	development.	Wye Valley and Forest of Dean Bat Sites SAC. Wye Valley Woodlands SAC		of Dean bat sites SACs.
Policy WG22 Protection and enhancement of Parish facilities and services	Support and upkeep of existing local community facilities. Promote new development of community facilities. Increase in vehicular movements. Increase in nonphysical disturbance.	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	Measures are included in both the Core Strategy and the Whitchurch and Ganarew Neighbourhood Plan to help relieved any increased pressure on the River Wye. The implementation of the Nutrient Management Plan will specifically address issues relating to water quality in the River Wye.	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. Although this policy could result in the development of new community facilities or the loss of existing provision to new uses, which depending on location could have potential effect on the River Wye SAC. However, sufficient policy safeguards are in place within the Local Plan (Core Strategy) and with the inclusion of additional wording in the Whitchurch and Ganarew NDP policy to avoid or mitigate any likely significant effects on the River Wye.
Policy WG23 Contributions to Parish Services, youth provision and recreation facilities	Support and upkeep of existing local community facilities through section 106 and CIL funds. Promote new development of community facilities. Increase in vehicular	New community facilities. Possible vehicular movements and demand for water abstraction and treatment. Physical damage of	River Wye (including the Lugg SAC). Wye Valley and Forest of Dean Bat Sites SAC.	Measures are included in both the Core Strategy and the Whitchurch and Ganarew Neighbourhood Plan to help relieved any increased pressure on the River Wye. The implementation of the	No. This policy will not have an impact on the River Wye sac, Wye Valley Wooflands and Wye Valley and Forest of Dean bat sites SACs. Although this policy could result in the development of new community facilities or

	movements. Increase in nonphysical disturbance.	disturbance on a localised scale. Non-physical disturbance such as noise.	Wye Valley Woodlands SAC	Nutrient Management Plan will specifically address issues relating to water quality in the River Wye.	the loss of existing provision to new uses, which depending on location could have potential effect on the River Wye SAC. However, sufficient policy safeguards are in place within the Local Plan (Core Strategy) and with the inclusion of additional wording in the Whitchurch and Ganarew NDP policy to avoid or mitigate any likely significant effects on the River Wye.
Policy WG24 Broadband infrastructure	Development and improvement of existing broadband infrastructure. Strengthen existing businesses and working from home Potential decrease in commuter traffic and development of new businesses.	This is unlikely to have a significant impact on the SACs.	River Wye (including the Lugg SAC). Wye Valley and Forest of Dean Bat Sites SAC. Wye Valley Woodlands SAC	Mitigation measures within the NDP and Core Strategy can help alleviate and mitigate un desirable impact caused during the construction process.	No. This policy is unlikely to have an impact on the River Wye sac, Wye Valley Woodlands and Wye Valley and Forest of Dean bat sites SACs.

Appendix 4

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

Parish Council Name: Whitchurch and Ganarew Group Parish Council

NDP Title: Whitchurch and Ganarew Group Draft Plan reg 16

Date undertaken: January 2019

Core Strategy HRA version: Adopted Core Strategy 2011-2031

NDP objectives, policies	HRA Screening of Emerging NDP objectives, options and policies				
	Likely activities (operations) to result as a consequence of the objective/option/policy	Likely effect if objective/option/policy implemented. Could they have Likely Significant Effects (LSE) on European Sites? (Yes/No, with reasons)	European Sites potentially affected	Mitigation measures to be considered, as necessary, through redraft of objective/policy and to be considered as part of Appropriate Assessment	Could the policy have likely significant effects on European sites (taking mitigation into account?)

Policies	Policies							
Policy WG1- 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. 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 WG2 Development Strategy	New housing allocated in selected sites Increase in water consumption. Non-physical disturbance during construction phase. Physical damage of disturbance on a localised scale.	Unlikely that there will be any significant effects on the European Site. All developments are required to meet the criteria of Policy LD2 to protect biodiversity and wildlife, and SD4 which seeks to ensure water quality of the SAC is not detrimentally effected.	River Wye (including the Lugg SAC) The river runs along the boundary of the parish. Wye Valley and Forest of Dean Bat Sites SAC. Wye Valley Woodlands SAC are within the group parish.	No	Not required. This policy 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 development is unlikely to be significant, as the development is contained in a sustainable approach. Allocations help give greater certainty.			
Policy WG3 Housing Development in Whitchurch	New housing development within the designation settlement boundaries of	Unlikely that there will be any significant effects on the European Site.	River Wye (including the	No	Not required. The scale and extent of potential housing development is unlikely to have a significant impact on the SAC.			

	Whitchurch and Ganarew . Increase in vehicle traffic. Increased demand for water abstraction and sewage treatment.	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.	Lugg SAC). Wye Valley and Forest of Dean Bat Sites SAC. Wye Valley Woodlands 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 to this policy post regulation 14, has a minor change to the settlement boundary removing part of the settlement boundary near the hotel. This change is unlikely to have a significant impact on the SACs.
Policy WG4 Housing development in Whitchurch	New housing on 2 sites for up to 12 dwellings in the identified settlement boundary of Whitchurch. Increase in water consumption. Non-physical disturbance during construction phase. Physical damage of disturbance on a localised scale.	Unlikely that there will be any significant effects on the European Site. All developments are required to meet the criteria of Policy LD2 to protect biodiversity and wildlife, and SD4 which seeks to ensure water quality of the SAC is not detrimentally effected.	River Wye (including the Lugg SAC) The river runs along the boundary of the parish. Wye Valley and Forest of Dean Bat Sites SAC. Wye Valley Woodlands SAC are within the group parish.	No	Not required. 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 WG5 Housing Development in Symonds Yat West	New housing development within the designation settlement boundaries in	Unlikely that there will be any significant effects on the European Site. All developments are	River Wye (including the	No	Not required. This policy will not have an impact on the River Wye sac, Wye Valley Woodlands and Wye Valley and Forest of

	Symonds Yat West. Increase in vehicle traffic. Increased demand for water abstraction and sewage treatment. Increase in water consumption. Non-physical disturbance during construction phase.	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.	Lugg SAC). Wye Valley and Forest of Dean Bat Sites SAC. Wye Valley Woodlands SAC		Dean bat sites SACs. The scale and extent of such development is unlikely to be significant, as the development is contained in a sustainable approach in accordance with policies SS1 and RA2 of the Core Strategy. Changes to this policy post regulation 14 consultation add further criteria to this policy. This criteria promotes appropriate development in line with the existing character of the village minimising potential harm to the natural and built environment.
Policy WG6 Affordable and intermediate Homes	Meeting housing needs in the group parish Small increase in affordable and intermediate homes being built in the group parish. Increased vehicle traffic Increased demand for water abstraction and sewage treatment Sustainable housing growth Mixture of people living within the group parish	Unlikely that there will be any significant effects on the European Site. All developments are required to meet the criteria of Policy LD2 to protect biodiversity and wildlife, and SD4 which seeks to ensure water quality of the SAC is not detrimentally effected	River Wye (including the Lugg SAC) The river runs along the boundary of the parish. Wye Valley and Forest of Dean Bat Sites SAC. Wye Valley Woodlands SAC are within the group parish.	No	Not required. This policy will not lead to development instead it provides criteria framework for affordable and intermediate homes within the parish.
Policy WG7 Housing	New development is in	Unlikely that there will be any significant effects	River Wye	No	No. This policy will not directly lead to development, instead it encourages fitting

Design and Appearance	keeping with local environment Innovative and high quality design of new development Local environment retained and preserved. Sets out design criteria for development to adhere to.	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.	(including the Lugg SAC) The river runs along the boundary of the parish. Wye Valley and Forest of Dean Bat Sites SAC. Wye Valley Woodlands SAC are within the group parish.		and environmentally supportive design to Whitchurch and Ganarew. Overall this is unlikely to have an impact on the River Wye sac, Wye Valley Woodlands and Wye Valley and Forest of Dean bat sites SACs.
Policy WG8 Sustainable Design	Sets out design criteria for development to adhere to. The built character is protected along with landscape character. New development is in keeping with local environment Promotion of sustainable design. Sustainable development encouraged.	Unlikely that there will be any significant effects on the European Site. All developments are required to meet the criteria of Policy LD2 to protect biodiversity and wildlife, and SD4 which seeks to ensure water quality of the SAC is not detrimentally effected.	River Wye (including the Lugg SAC) The river runs along the boundary of the parish. Wye Valley and Forest of Dean Bat Sites SAC. Wye Valley Woodlands SAC are within the group parish.	No	No. This policy will not have an impact on the River Wye sac, Wye Valley Woodlands and Wye Valley and Forest of Dean bat sites SACs. No this policy will not directly lead to development. Instead it, aims to encourage suitable designed developments to be in keeping with the vernacular of Whitchurch and Ganarew.
Policy WG9 Land adjacent to the River Wye to the east of Whitchurch	Tourism growth Support accommodation tourism facilities within the land adjacent to the River	Unlikely that there will be any significant effects on the European Site. All developments are required to meet the criteria of Policy LD2 to	River Wye (including the Lugg SAC) The river runs along the boundary of	•	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

	Wye and east of Whitchurch. Increase in vehicular traffic Further safeguards added to ensure development will not have a significant impact on the River Wye SAC. Farm diversification Regenerative projects to increase tourism	protect biodiversity and wildlife, and SD4 which seeks to ensure water quality of the SAC is not detrimentally effected.	the parish. Wye Valley and Forest of Dean Bat Sites SAC. Wye Valley Woodlands SAC are within the group parish.		employment development is unlikely to have a significant impact on the SAC. There are sufficient policy safeguards within the NDP and Core Strategy.
Policy WG10 Stoney Hills Industrial Estate and the complex of industrial and commercial buildings between the Old Ross Road and The Old Forge	Retained and enhanced employment sites. Potential construction traffic and noise. Job creation Intensification and enhancement of current business premises Encourage of small domestic based employment facilities. Promotion of business development Job creation in local area Small reduction in vehicular usage.	Unlikely that there will be any significant effects on the European Site. All developments are required to meet the criteria of Policy LD2 to protect biodiversity and wildlife, and SD4 which seeks to ensure water quality of the SAC is not detrimentally effected	River Wye (including the Lugg SAC) The river runs along the boundary of the parish. Wye Valley and Forest of Dean Bat Sites SAC. Wye Valley Woodlands SAC are within the group parish.	No.	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 development is unlikely to have a significant impact on the SAC. There are sufficient policy safeguards within the NDP and Core Strategy to help to ensure there are no likely significant effects on the Wye Valley and Forest of Dean bat sites SAC, Wye Valley and Forest of Dean SAC. However this can be further assessed at planning application stage, when more details such as location and materials are known.

Policy WG11 Use of Rural Buildings	Sustainable re use of agricultural buildings. Small scale development Live / work units supported Nonphysical disturbance caused from construction. Use of suitable materials in keeping with traditional materials used in rural buildings.	Unlikely that there will be any significant effects on the European Site. All developments are required to meet the criteria of Policy LD2 to protect biodiversity and wildlife, and SD4 which seeks to ensure water quality of the SAC is not detrimentally effected.	River Wye (including the Lugg SAC) The river runs along the boundary of the parish. Wye Valley and Forest of Dean Bat Sites SAC. Wye Valley Woodlands SAC are within the group parish.	No.	No. It is unlikely that the policy will not have an impact on the River Wye sac, Wye Valley Woodlands and Wye Valley and Forest of Dean bat sites SACs. There are sufficient policy safeguards within the NDP and Core Strategy to help to ensure there are no likely significant effects on the Wye Valley and Forest of Dean bat sites SAC, Wye Valley and Forest of Dean SAC. However this can be further assessed at planning application stage, when more details such as location and materials are known.
Policy WG12 Working from home	Encourage of small domestic based employment facilities. Promotion of business development Job creation in local area Small reduction in vehicular usage / commuter traffic	Unlikely that there will be any significant effects on the European Site. All developments are required to meet the criteria of Policy LD2 to protect biodiversity and wildlife, and SD4 which seeks to ensure water quality of the SAC is not detrimentally effected.	River Wye (including the Lugg SAC) The river runs along the boundary of the parish. Wye Valley and Forest of Dean Bat Sites SAC. Wye Valley Woodlands SAC are within the group parish.	No.	Not required. It is unlikely that the policy will not have an impact on the River Wye sac, Wye Valley Woodlands and Wye Valley and Forest of Dean bat sites SACs. There are sufficient policy safeguards within the NDP and Core Strategy to help to ensure there are no likely significant effects on the Wye Valley and Forest of Dean bat sites SAC, Wye Valley and Forest of Dean SAC. However this can be further assessed at planning application stage, when more details such as location and materials are known.
Policy WG13 Poly- tunnel policy	Appropriate poly tunnel development Rural business	Unlikely that there will be any significant effects on the European Site. All developments are required to meet the	River Wye (including the Lugg SAC) The river runs along	No.	Not required. This policy will not have an impact on the River Wye sac, Wye Valley Woodlands and Wye Valley and Forest of Dean bat sites SACs.

	development Noise, odour and smell minimised. Unobtrusive lighting on new schemes.	criteria of Policy LD2 to protect biodiversity and wildlife, and SD4 which seeks to ensure water quality of the SAC is not detrimentally effected.	the boundary of the parish. Wye Valley and Forest of Dean Bat Sites SAC. Wye Valley Woodlands SAC are within the group parish.		
Policy WG14 Conserving the landscape and scenic beauty, both within and outside 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.	Unlikely that there will be any significant effects on the European Site. All developments are required to meet the criteria of Policy LD2 to protect biodiversity and wildlife, and SD4 which seeks to ensure water quality of the SAC is not detrimentally effected.	River Wye (including the Lugg SAC) The river runs along the boundary of the parish. Wye Valley and Forest of Dean Bat Sites SAC. Wye Valley Woodlands SAC are within the group parish.	No	Not required. This policy strives to protect and enhance the natural landscape and natural environment, this could potentially have a positive impact on the SAC sites. Implementation of Core Strategy policy SD4, LD2, SD1 to grant planning permission will ensure water quality issues are addressed.
Policy WG15 Enhancement of the natural environment	Protection and enhancement of the natural environment. Encouragement of sustainable development which preserves and protects the landscape, environment	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	River Wye (including the Lugg SAC) The river runs along the boundary of the parish. Wye Valley and Forest of Dean	No	Not required. This policy strives to protect and enhance the natural environment, this could potentially have a positive impact on the SAC sites. Implementation of Core Strategy policy SD4, LD2, SD1 to grant planning permission will ensure water quality issues are addressed.

	and habitats.	detrimentally effected	Bat Sites SAC. Wye Valley Woodlands SAC are within the group parish.		
Policy WG16 Protecting Heritage assets	Sustainable re use of agricultural buildings. Sustainable development encouraged within the identified settlements. Minimal increase demand for water abstraction and sewage treatment Sustainable housing growth	Unlikely that there will be any significant effects on the European Site. All developments are required to meet the criteria of Policy LD2 to protect biodiversity and wildlife, and SD4 which seeks to ensure water quality of the SAC is not detrimentally effected.	River Wye (including the Lugg SAC) The river runs along the boundary of the parish. Wye Valley and Forest of Dean Bat Sites SAC. Wye Valley Woodlands SAC are within the group parish	No	Not required. This policy strives to protect and enhance the historic built environment, this could potentially have a positive impact on the SAC sites. Implementation of Core Strategy policy SD4, LD2, SD1 to grant planning permission will ensure water quality issues are addressed.
Policy WG17 Protection from flood risk	Strive to reduce impact of flooding within Whitchurch and Ganarew. New development designed to appropriately reduce flood risk. Sustainable design promoted. Infrastructure development phased in line with infrastructure works within the plan period.	This policy will help to safeguard against flooding from foul and storm drainage.	River Wye (including the Lugg SAC). Wye Valley and Forest of Dean Bat Sites SAC. Wye Valley Woodlands SAC	No.	Not required. This policy will not have an impact on the River Wye sac, Wye Valley Woodlands and Wye Valley and Forest of Dean bat sites SACs. This policy ensures new development in Whitchurch and Ganarew is safeguarded against flooding. Also that the infrastructure will have enough capacity for any planned development. There are sufficient policy safeguards within the NDP and Core Strategy. This policy post regulation 14 provides further criteria to ensure new development is appropriately tested in

					line with the Core Strategy and NPPF.
Policy WG18 Sewerage infrastructure	Reduce impact of flooding and storm water flooding within Whitchurch and Ganarew. Sustainable design promoted. Infrastructure development phased in line with infrastructure works within the plan period.	This policy will help to safeguard against flooding from foul and storm drainage along with identifying sewerage treatment works in line with WwTWs.	River Wye (including the Lugg SAC). Wye Valley and Forest of Dean Bat Sites SAC. Wye Valley Woodlands SAC.	No.	Not required. This policy will not have an impact on the River Wye sac, Wye Valley Woodlands and Wye Valley and Forest of Dean bat sites SACs. This policy ensures new development in Whitchurch and Ganarew is safeguarded against flooding and there is sufficient capacity in the WwTws. Also that the infrastructure will have enough capacity for any planned development.
Policy WG19 Renewable and low carbon energy	Support for renewable and low carbon energy proposals Development of renewable energy schemes on a domestic scale Support community and local businesses renewable energy schemes and low carbon proposals Reduction on carbon based energy usage in the long term	This policy supports renewable energy schemes and low carbon energy schemes. This is unlikely to have a significant impact on the SACs.	River Wye (including the Lugg SAC). Wye Valley and Forest of Dean Bat Sites SAC. Wye Valley Woodlands SAC	No.	Not required. This policy will not have an impact on the River Wye sac, Wye Valley Woodlands and Wye Valley and Forest of Dean bat sites SACs. This policy ensures suitable community energy projects will have minimal environmental impact. Therefore is unlikely to impact on the SACs.
Policy WG20 Traffic measures within the parish	Promotion of safer roads. Improved sustainable modes of transport such as cycling, walking, and public	Unlikely that there will be any significant effects on the European Site. All developments are required to meet the criteria of Policy LD2 to	River Wye (including the Lugg SAC). Wye Valley and	No.	Not required. This policy will not lead to development instead it provides traffic alleviation measures for developments to adhere to.

	transport links. Decrease in nonphysical disturbances- noise Increase in walking and cycling. Decrease in traffic accidents. Development of transport infrastructure Traffic Calming measures Improvement of road safety	protect biodiversity and wildlife, and SD4 which seeks to ensure water quality of the SAC is not detrimentally effected.	Forest of Dean Bat Sites SAC. Wye Valley Woodlands SAC		
Policy WG21 Highway design requirements	Sets out criteria for highway design. Sustainable development encouraged. Decrease in nonphysical disturbances- noise Increase in walking and cycling. Decrease in traffic accidents. Development of transport infrastructure Traffic Calming measures Improvement of road safety	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). Wye Valley and Forest of Dean Bat Sites SAC. Wye Valley Woodlands SAC	No.	Not required. This policy will not lead to development instead it provides highway design requirements for developments to adhere to. Implementation of Core Strategy policy SD4, LD2, SD1 to grant planning permission will ensure water quality issues are addressed.

Policy WG22 Protection and enhancement of Parish facilities and services	Support and upkeep of existing local community facilities. Promote new development of community facilities. Increase in vehicular movements. Increase in nonphysical disturbance.	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). Wye Valley and Forest of Dean Bat Sites SAC. Wye Valley Woodlands SAC	No.	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. Although this policy could result in the development of new community facilities or the loss of existing provision to new uses, which depending on location could have potential effect on the River Wye SAC. However, sufficient policy safeguards are in place within the Local Plan (Core Strategy) and with the inclusion of additional wording in the Whitchurch and Ganarew NDP policy.
Policy WG23 Contributions to Parish Services, youth provision and recreation facilities	Support and upkeep of existing local community facilities through section 106 and CIL funds. Promote new development of community facilities. Increase in vehicular movements. Increase in nonphysical disturbance.	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). Wye Valley and Forest of Dean Bat Sites SAC. Wye Valley Woodlands SAC	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.
Policy WG24 Broadband infrastructure	Development and improvement of existing broadband infrastructure. Broadband strengthen and improved Increase in local businesses and productivity	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	River Wye (including the Lugg SAC). Wye Valley and Forest of Dean Bat Sites SAC. Wye Valley	No.	Not required. This policy will not lead to development instead it provides broadband and telecommunication criteria, for new development to adhere to.

Small decrease in vehicular usage	

Appendix 5

HRA Consultation Feedback

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

Parish Council Name: Whitchurch and Ganarew Group Parish

Neighbourhood Development Plan Name: Whitchurch and Ganarew Neighbourhood Plan

Details of consultation:

Consultation date: 9 April to 21 May 2018

Consultation title: Regulation 14

Response Date	Consultee	Summary of Comments	Response to Comments
17.05.18	Natural England	 Natural England notes the screening process applied to this Neighbourhood plan. We agree with the conclusion that further assessment is required to establish no likely significant effects on the following designations: River Wye SAC. Wye Valley and Forest of Dean Bat Sites SAC Natural England notes the proximity of allocated sites in the draft plan to the River Wye SAC, and recommends that further consideration is given to these policies to ensure that impacts on the Wye are avoided. 	Duly noted.

Appendix 6

HRA Consultation Feedback

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

Parish Council Name: Whitchurch and Ganarew Group Parish

Neighbourhood Development Plan Name: Whitchurch and Ganarew Neighbourhood Plan

Details of consultation: Regulation 16

Consultation date: 18 January to 1 March 2019

Consultation title: Regulation 16

No comments regarding the HRA at regulation 16 Consultation have been received.

Appendix 7

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

Parish Council Name: Whitchurch and Ganarew Group Parish Council

NDP Title: Whitchurch and Ganarew Group final plan

Date undertaken: September 2019

Core Strategy HRA version: Adopted Core Strategy 2011-2031

NDP objectives, policies	HRA Screening of Emerging NDP objectives, options and policies				
	Likely activities (operations) to result as a consequence of the objective/option/policy	Likely effect if objective/option/policy implemented. Could they have Likely Significant Effects (LSE) on European Sites? (Yes/No, with reasons)	European Sites potentially affected	Mitigation measures to be considered, as necessary, through redraft of objective/policy and to be considered as part of Appropriate Assessment	Could the policy have likely significant effects on European sites (taking mitigation into account?)
WG8	Sets out design criteria for development to adhere to. The built character is protected along with landscape character. New development is in keeping with local environment Promotion of sustainable design. Sustainable development encouraged.	Unlikely that there will be any significant effects on the European Site. All developments are required to meet the criteria of Policy LD2 to protect biodiversity and wildlife, and SD4 which seeks to ensure water quality of the SAC is not detrimentally effected.	River Wye (including the Lugg SAC) The river runs along the boundary of the parish. Wye Valley and Forest of Dean Bat Sites SAC. Wye Valley Woodlands SAC are within the group parish.	No	Changes to this policy post examination help to clarify the policy and help to make it implementable, encouraging sustainable development within the parish. An appropriate assessment I is still not required. This policy will not have an impact on the River Wye sac, Wye Valley Woodlands and Wye Valley Woodlands and Wye Valley and Forest of Dean bat sites SACs. No this policy will not directly lead to development. Instead it, aims to encourage suitable designed developments to be

					in keeping with the vernacular of Whitchurch and Ganarew.
WG9	Tourism growth Support accommodation tourism facilities within the land adjacent to the River Wye and east of Whitchurch. Increase in vehicular traffic Further safeguards added to ensure development will not have a significant impact on the River Wye SAC. Farm diversification Regenerative projects to increase tourism.	Unlikely that there will be any significant effects on the European Site. All developments are required to meet the criteria of Policy LD2 to protect biodiversity and wildlife, and SD4 which seeks to ensure water quality of the SAC is not detrimentally effected.	River Wye (including the Lugg SAC) The river runs along the boundary of the parish. Wye Valley and Forest of Dean Bat Sites SAC. Wye Valley Woodlands SAC are within the group parish.	No	Changes to this policy post examination help to clarify the policy and help to make it implementable, whilst better reflecting CS policies SS5, RA6 and E4. An appropriate assessment I is still not required. No. This policy will not have an impact on the River Wye sac, Wye Valley Woodlands and Wye Valley Woodlands and Wye Valley and Forest of Dean bat sites SACs. The scale and extent of potential employment development is unlikely to have a significant impact on the SAC. There are sufficient policy safeguards within the NDP and Core Strategy.
WG11	Sustainable re use of agricultural buildings. Small scale development Live / work units supported Nonphysical disturbance caused from construction. Use of suitable materials in	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	River Wye (including the Lugg SAC) The river runs along the boundary of the parish. Wye Valley and Forest of Dean	No	Changes to this policy post examination help to strengthen, clarify the policy and help to make it implementable. An appropriate assessment is still not required. No. It is unlikely that the policy will not have an impact on the River Wye sac, Wye Valley

	keeping with traditional materials used in rural buildings.	detrimentally effected.	Bat Sites SAC. Wye Valley Woodlands SAC are within the group parish.		Woodlands and Wye Valley and Forest of Dean bat sites SACs. There are sufficient policy safeguards within the NDP and Core Strategy to help to ensure there are no likely significant effects on the Wye Valley and Forest of Dean bat sites SAC, Wye Valley and Forest of Dean SAC. However this can be further assessed at planning application stage, when more details such as location and materials are known.
WG13	Appropriate poly tunnel development Rural business development Noise, odour and smell minimised. Unobtrusive lighting on new schemes.	Unlikely that there will be any significant effects on the European Site. All developments are required to meet the criteria of Policy LD2 to protect biodiversity and wildlife, and SD4 which seeks to ensure water quality of the SAC is not detrimentally effected.	River Wye (including the Lugg SAC) The river runs along the boundary of the parish. Wye Valley and Forest of Dean Bat Sites SAC. Wye Valley Woodlands SAC are within the group parish.	Νο	Changes to this policy post examination help to clarify the policy and help to make it implementable and accurately reflecting guidance set out in the NPPF. An appropriate assessment is still not required. This policy will not have an impact on the River Wye sac, Wye Valley Woodlands and Wye Valley and Forest of Dean bat sites SACs.

Appendix 8

Policy	Modification recommended	Justification
Issues	Change the penultimate sentence in paragraph 3.4.2 on page 15 of the Plan to read: "Major development should be refused <i>except in</i> exceptional circumstances <i>and</i> where it can be demonstrated to be in the public interest."	Conform to the revised NPPF. Interests of accuracy and clarity.
WG1	Add "and other documents which comprise the development plan" at the end of the first sentence of the policy.	Interests of accuracy and clarity.
WG2	Change the word "limited" in criterion d) to "appropriate"	Interests of accuracy and clarity.
WG3	Change the words "but on its edge" in the third paragraph of the policy to "but adjacent or in close proximity to the settlement boundary"	Interests of accuracy and clarity.
WG5	Change criterion ii) to read: "Utilise <i>clearly perceptible</i> infill plots when viewed in relation to the character of the frontage, bearing in mind the <i>grain, rhythm and</i> density <i>that predominates</i> in that part of the settlement."	Ensure policy is more robust and clear.
WG7	Change the word "should" in the first sentence of the policy to " <i>is encouraged</i> to"	Interests of accuracy and clarity. In line with the written ministerial statement of 25/3/15. In this, they announced that it is now not appropriate to refer to any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings in neighbourhood plans.
WG8	 Reword the policy to read: "An integrated approach to achieve a high standard of sustainable design <i>is encouraged</i> to achieve the maximum possible reduction in the carbon footprint of any development. Development proposals <i>are encouraged to</i> contain a coordinated package of design measures which, in addition to regulatory requirements, include: a) Utilising physical sustainability measures associated with buildings that include orientation of buildings, the provision of energy- and water conservation measures, storage for bicycles and storage for waste including provision for recycling, broadband infrastructure and renewable energy infrastructure such as photovoltaic or photo-thermal panels, airsource and ground-source heat pumps, where these do not detract from any historic fabric or settings. <i>New development should</i>: b) <i>Provide</i> tree-planting and other forms of green infrastructure to provide shade and shelter <i>and maximise use</i> of permeable surfaces; c) <i>Support</i> infrastructure to promote sustainable travel <i>wherever possible</i>; d) <i>Enable</i> a sustainable drainage system to serve a wider range of properties where <i>such</i> opportunities exist; e) <i>Ensure that an assessment is carried out to establish the extent and nature of any contamination where there is good reason to believe that contamination of land may exist on any site, including through agricultural processes <i>and make sure</i> that effective measures are taken to ensure that potential occupiers and the wider environment are not put at unacceptable risk;</i> f) <i>Minimise</i> construction traffic and <i>reduce</i> waste; <i>and</i> 	In line with the NPPF. In line with the written ministerial statement of 25/3/15. Ensure this policy helps to promote sustainable development.

[
	g) <i>Ensure</i> that where external lighting is required, it <i>is</i>	
	appropriate to its purpose and supported by a lighting	
	plan that demonstrates that it will not have an adverse	
	effect through unnecessary glare, light-trespass, scenic	
	intrusion or sky-glow.	
	New homes must be fully integrated into the existing	
	neighbourhood and support a pedestrian-friendly	
	environment through convenient links to local	
	facilities and public transport connections which are	
	suitable for those with pushchairs, in wheelchairs, walking	
	with aids or using mobility scooters.	
	Where new innovative sustainable design or features are	
	incorporated, they should fit sensitively within the street	
	scene and incorporate a number of locally distinctive	
	features to maintain the Parish's cohesive character."	
WG9	Add a new criterion to the policy that reads: "Particular	Additional criteria added to help
	regard will be had to conserving the landscape and scenic	clarify the policy.
	beauty in the Area of Outstanding Natural Beauty." Add a	
	new criterion to the policy that reads: "Any development	Accurately reflect the stance of the
	will need to take account of the site's location within a	NPPF.
		INFEL.
	Flood Zone in accordance with the NPPF, CS policies and	Detter reflection of CO religion COF
	Policy WG19." Add the words "as identified on the	Better reflection of CS policies SS5,
	Whitchurch Policies Map" after "adjacent to the River	RA6 and E4.
	Wye"in the first sentence of the policy	
WG11	Revise the policy to read:	Strengthen and clarify the policy.
	"The change of use of large country houses and	
	farmsteads, the re-use of rural buildings, and extensions	
	to or intensification of use in such buildings, including	
	through associated small-scale and well designed new	
	buildings, that enable rural business or enterprise,	
	including live/work units, will be supported provided:	
	a) The nature and scale of the use reflects the rural	
	landscape and has an acceptable impact on the highway	
	network;	
	b) Where the use requires external storage to support the	
	rural-based activity, external screening is provided to fully	
	mitigate the effects upon the local landscape from all	
	publicly visible locations;	
	c) The residential amenity of adjacent properties is not	
	adversely affected from the operation of the enterprise	
	itself or any associated traffic movements;	
	d) Limited additional buildings may be provided to support	
	the enterprise or reduce external storage where these are	
	well designed and reflect small scale traditional	
	agricultural or rural buildings within the landscape; and	
	e) Where the rural buildings involved comprise a historic	
	farmstead, such buildings under d) should be informed by	
14/01/0	an analysis of these historic settlements."	
WG13	Add the word "necessarily" before "comply with" in	Accurately reflect the stance of the
	the fourth sentence of paragraph 7.6.2 on page 46 of the	NPPF.
	Plan Delete the fifth and subsequent sentences of	
	paragraph 7.6.2 Delete criterion a) of the policy	
	Delete the words "Where proposals do not amount to	
	major development, they" from criterion b) and replace	Interests of accuracy and clarity.
	with " <i>Proposals</i> " Change the last paragraph of the policy	, · · · · · ,
	to read: "Where proposals amount to major development,	
	protecting the <i>scenic</i> beauty and landscape of the AONB	
	will be given priority and such proposals will not be	
	acceptable except in exceptional circumstances and it can	
	be satisfactorily demonstrated that the proposal is in the	
	public interest, there is no viable alternative location	
	outside of the AONB, and the environmental effects can	
	be mitigated to an acceptable degree."	

WG14	Add the words "except in exceptional circumstances and	Accurately reflect the stance of the
VVG14	Add the words "except in exceptional circumstances and where" after "major development" in the third sentence of the policy deleting the word "unless"	Accurately reflect the stance of the NPPF.
	from the same sentence. Delete the sentence that begins "In determining whether a proposal is major development" and the five criteria a) to e) that follow	Better reflection of the Core Strategy.
	from the policy.	Help achieve sustainable development.
WG15	Change the last sentence of the policy to read: "There should be no net loss of biodiversity and the loss of any features, <i>including those which potentially reduce the</i>	In accordance with the Core Strategy and NPPF.
	coherence and effectiveness of the ecological network of sites, will only be permitted in exceptional circumstances and where satisfactory offset and compensatory measures can be brought forward."	To help achieve sustainable development.
WG16	Change the last sentence of the policy to read: "Herefordshire Local Plan Core Strategy <i>policies</i> RA3 (6) <i>and RA5.</i> "	In accordance with the Core Strategy and NPPF.
		To help achieve sustainable development.
WG19	Add the words "Small scale" at the start of the first sentence of the policy	Interests of clarity and accuracy.
		To help achieve sustainable development.
WG20	Delete Policy WG20 and its supporting text at paragraphs 9.2.1, 9.2.2 and 9.2.3	Removal of policy as the policy is aspirational and non land use.
WG21 WG22	Change the title of the policy to " <i>Transport related</i> requirements" Change the first sentence of the policy to read: " <i>Development proposals should ensure</i> :" Change criterion a) to read: " <i>Satisfactory access is provided for</i> <i>vehicles, cyclists and pedestrians;</i> " Change criterion b) to read: " <i>That satisfactory off-street parking is provided</i> <i>including, where appropriate, provision for cycle parking</i> <i>and storage, in accordance with Herefordshire Council's</i> <i>car parking standards and, where appropriate, take every</i> <i>available opportunity to address or improve parking</i> <i>problems that exist in the vicinity of the site.</i> In addition, off road parking spaces should be constructed using permeable materials;" Reword criterion c) to read: " <i>The</i> <i>volume of traffic generated is acceptable in relation to the</i> <i>capacity and nature of the local road network;</i> " Delete the word "key" from the second and last sentences of the policy. Add the words " <i>or where a replacement</i> <i>facility or service of equivalent or better provision is</i> <i>provided is provided in a suitable location.</i> " at the end of the policy.	In accordance with the Core Strategy and NPPF. Interests of clarity, precession and accuracy. To help achieve sustainable development. In accordance with the Core Strategy and NPPF. Improve flexibility of the policy.
Glossary	Change "Conservation Area" to "An area designated as being of special architectural or historic interest, the character or appearance of which should be preserved or enhanced" Add "A series of statutory documents" at the start of the definition of "Development Plan' Update the definition of "Local Plan' using the definition in the most recent NPPF. Update "National Planning Policy Framework" to refer to the most recent NPPF. Delete the sentence which begins "Sometimes developers can self impose obligations" from "Planning Obligations"	Interests of accuracy and clarity. Removal of repetition and avoid confusion.

Update "Presumption in Favour of Sustainable	
Development"	
Delete "Public Inquiry" or add definition [as there is no	
"Inquiry" definition]	
Delete "Sequential Test" Delete the sentence which	
begins "An approach to development" from	
"Sustainable Development"	
Add the word "usually" after "Planning permission	
must" in "Use Classes	
Order"	