

Habitats Regulations Assessment

Regulation 16 Report for:

Goodrich & Welsh Bicknor Group Neighbourhood Area

August 2018



Goodrich and Welsh Bicknor Group Neighbourhood Plan 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 Goodrich and Welsh Bicknor Group Neighbourhood Plan NDP policies**
Table 1 - Colour coding key for Matrix
 - 8 Conclusions from the Screening Matrix and if any ‘likely significant effects’**
 - 9 Identification of other plans and projects which may have ‘in-combination’ effects**
 - 10 Conclusion**
 - 11 Next steps**
- Appendix 1 – Initial Screening Report (August 2016)**
- Appendix 2 – List of options assessed**
- Appendix 3 – Full Screening matrix of final policies and sites**
- Appendix 4 – Feedback on Habitat Regulation Assessment Report consultation (February 2018)**
- Appendix 5- HRA feedback from NE**

1 Introduction

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



2 The requirement to undertake Habitats Regulations Assessment of neighbourhood plans

- 2.1 The requirement to undertake HRA of development plans was confirmed by the amendments to the "Habitats Regulations" published for England and Wales in July 2007 and updated in 2013. Therefore, when preparing its NDP, Goodrich and Welsh Bicknor Parish Council is required by law to carry out an assessment known as "Habitats Regulations Assessment". It is also a requirement in Regulation 32 schedule 2 of the Neighbourhood Planning Regulations 2012.
- 2.2 Article 6(3) of the EU Habitats Directive provides that:
Any plan or project not directly connected with or necessary to the management of the [European] site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its

implications for the site in view of the site's conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public.

- 2.3 HRA is an impact-led assessment and refers to the assessment of the potential effects of a neighbourhood plan on one or more European sites, including Special Protection Areas (SPAs) and Special Areas of Conservation (SACs):
- **SPAs** are classified under the European Council Directive 'on the conservation of wild birds' (79/409/EEC; 'Birds Directive') for the protection of **wild birds and their habitats** (including particularly rare and vulnerable species listed in Annex 1 of the Birds Directive, and migratory species).
 - **SACs** are designated under the Habitats Directive and target **particular habitats** (Annex 1) and/or species (Annex II) identified as being of European importance.
- 2.4 For ease of reference during HRA, general practice has been that these three designations are collectively referred to as either **Natura 2000** or **European sites**. This means that a Screening Assessment is carried out with regard to the Conservation Objectives of the European Sites and with reference to other plans or projects to identify if any significant effect is likely for any European Site.
- 2.5 Herefordshire Council is aware of the recent judgement (People over Wind, Peter Sweetman vs Coillte). The Court of Justice of the European Union (CJEU) ruled that Article 6(3) of the Habitats Directive must be interpreted as meaning that mitigation measures should be assessed within the framework of an appropriate assessment and that it is not permissible to take account of measures intended to avoid or reduce the harmful effects of the plan on a European site at the screening stage. The initial screening undertaken in August 2016 and concluded that a full HRA would be required. Mitigation was not taken into account at this stage.
- 2.6 The purpose of this final HRA Report is to detail the findings of the screening of proposed changes to policies and consider if they significantly affect the conclusions of the earlier HRA Report (February 2018) and reviewed in terms of the implications of *Sweetman*.

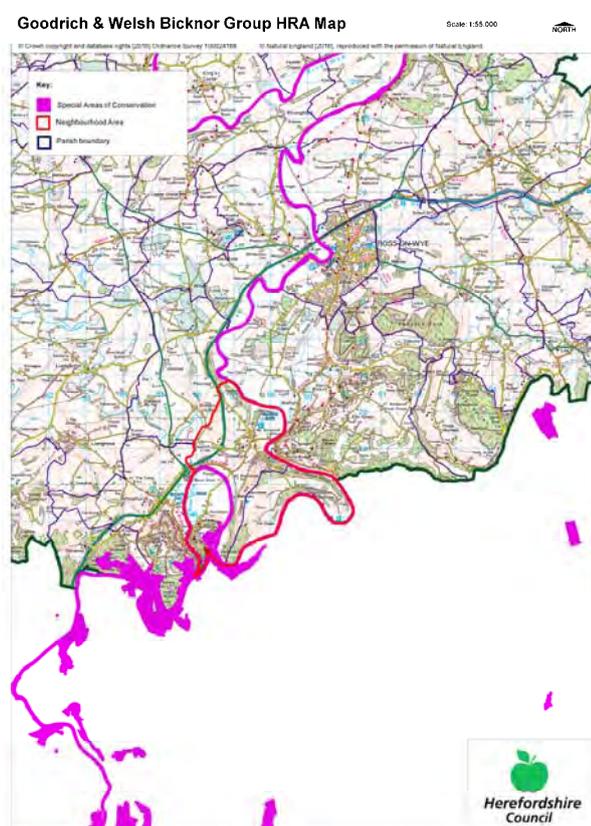
3 Methodology

- 3.1 Although the Goodrich and Welsh Bicknor NDP is not in direct management of any European sites, it does include proposals for development which may affect European sites. Therefore, it is necessary under Regulation 102(1)(a) of the Habitats Regulations 2010 to undertake screening for likely significant effects on European sites.
- 3.2 The HRA of neighbourhood plans is undertaken in stages and should conclude whether or not a proposal or policy in a neighbourhood plan would adversely affect the integrity of the site in question. This is judged in terms of the implications of the plan for a site's 'qualifying features' (i.e. those Annex I habitats, Annex II species, and Annex I bird populations for which it has been designated) and are measured with reference to the conservation objectives for those qualifying features as defined by Natural England.
- 3.3 The first process is to undertake an initial screening report to determine the need to undertake the requirement for a HRA, this initial screening identifies whether the Plan could impact upon any European site that could be within the Neighbourhood Area or nearby.

- 3.4 If a European Site is within the Neighbourhood Area or the Neighbourhood Area could impact upon a European site then this will need to be taken into account and a full screening assessment will need to be undertaken.
- 3.5 The full screening stage consists of a description of the plan, identification of potential effects on European Sites, assessing the effects on European Sites. For Neighbourhood Plans the outcome should demonstrate there are no likely effects upon the European sites. If any likely effects occur then there will need to be amendments to the NDP made and be re-screened until all likely effects have been addressed.

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

- 4.1 The initial Screening report (August 2016) found that the River Wye (including the River Lugg) SAC is located inside the parish and the parish falls within the hydrological catchment of the River Wye.. Figure 2 below highlights the location of River Wye SAC, Wye Valley Woodlands are in the parish and Wye Valley and Forest of Dean Bat sites SAC are 5.5km away from the parish in relation to the neighbourhood area.



- 4.2 There is also a duty under the Water Framework Directive to ensure that proposals for growth do not adversely affect the river water quality and this included the associated watercourses flowing into the rivers.

Site integrity of the River Wye (including the River Lugg) SAC

- 4.3 The issues associated with maintaining the sites integrity include water levels and flow, water quality, eutrophication (nitrogen enrichment), sedimentation, disturbance and species maintenance.

- 4.4 The River Wye SAC can be sensitive to changes in water quantity and quality. As outlined within the Habitat Regulation Assessment to the Herefordshire Core Strategy, the water supply in this area comes from Dwr Cymru Welsh Water (DCWW) and no likely significant effects on European sites as a result of changes in water quality are expected in relation to the proportional growth outlined with the Herefordshire Core Strategy.
- 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 Goodrich and Welsh Bicknor Initial Screening Report. The Initial Screening Report, August 2016, can be found in Appendix 1 of this HRA report.
- 4.8 This information made it possible to identify the features of each site which determine site integrity, as well as the specific sensitivities of each site, therefore enabling later analysis of how the potential impacts of the Goodrich and Welsh Bicknor Neighbourhood Plan may affect site integrity.
- 4.9 The initial screening assessment indicated that a full screening assessment is required to assess the likelihood of significant effects on the River Wye (including the River Lugg) SAC of the policies within the Goodrich and Welsh Bicknor NDP.

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

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

- 4.12 In relation to impact on biodiversity and important species, Policy LD2 of the Herefordshire Core Strategy indicates that any development should conserve, restore and enhance biodiversity and geodiversity assets of Herefordshire. Development within close proximity to internationally and local designated sites will need to incorporate sympathetic design components to enhance their nature conservation interests.
- 4.13 For full details of the Wye Valley and Forest of Dean Bat Sites attributes and Wye Valley Woodlands which contribute to and define their integrity and vulnerable data see Appendix 1 of the Goodrich and Welsh Bicknor Initial Screening Report. The Initial Screening Report, August 2016, can be found in Appendix 1 of this HRA report.
- 4.14 This information made it possible to identify the features of each site which determine site integrity, as well as the specific sensitivities of each site, therefore enabling later analysis of how the potential impacts of the Goodrich and Welsh Bicknor Neighbourhood Plan may affect site integrity.
- 4.15 The initial screening assessment indicated that a full screening assessment is required to assess the likelihood of significant effects on the Wye Valley and Forest of Dean Bat Sites of the policies within the Goodrich and Welsh Bicknor NDP. For full details of the Wye Valley & Forest of Dean Bat Sites SAC attributes which contribute to and define their integrity and vulnerable data see Appendix 1 of the Goodrich and Welsh Bicknor Plan Initial Screening Report. The Initial Screening Report, August 2016, can be found in Appendix 4 of this HRA report. This information made it possible to identify the features of each site which determine site integrity, as well as the specific sensitivities of each site, therefore enabling later analysis of how the potential impacts of the Goodrich and Welsh Bicknor Plan Neighbourhood Plan may affect site integrity.
- 4.16 The initial options for the NDP were assessed to determine their environmental impact that could affect the Wye Valley & Forest of Dean Bat Sites SAC. Overall the majority of the options proposing any growth appear to depend on location and scale in relation to environmental impact.
- 4.17 As the Goodrich and Welsh Bicknor Plan progresses from options onto their NDP policies, the Plan will need to identify ways in which the Goodrich and Welsh Bicknor NDP effect on the Wye Valley & Forest of Dean Bat Sites SAC could be achieved, alongside taking forward the preferred options from the consultation from the community. If a majority of these options are taken forward either as standalone policies or in combination with other policies then the mitigation from these options will help to counter balance the effect of all new development within the Parish. A list of the options and site options assessed can be found in Appendix 2.

5 Description of the Goodrich and Welsh Bicknor Neighbourhood Development Plan

- 5.1 The submission Goodrich and Welsh Bicknor NDP presents detailed policies for development in the Neighbourhood Area, which is equivalent to the group parish boundary, up to 2031. The Plan begins by introducing its preparation and highlighting its issues.
- 5.2 The NDP then details the vision for the Group Parish over the Plan period; "Our community will be a place where people can enjoy living and working in a rural setting. The predominantly quiet, small scale nature of our parish will be preserved whilst accommodating the growth and development needed to meet the needs of the community and promote a sustainable and thriving community life."

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

- Local environment
- New housing.
- Infrastructure and roads
- Community facilities
- Energy
- Economic development and Employment

5.3 The initial options for the NDP (refer to appendix 2) were assessed to determine their environmental impact that could affect the River Wye SAC, Wye Valley Woodlands and Wye Valley Forest of Dean Bat sites SAC. Of the five general options put forward the 'no NDP / do nothing' option was not considered viable for the Parish. All of which indicated towards growth however all the options would be seeking to provide proportional growth in line with the Core strategy and are therefore unlikely to have a significant impact on the SAC. The options considered are listed below.

Option 1- Locating housing sites to meet the required level within or adjacent to the two settlement areas Goodrich Church and Goodrich Cruse.
Option 2- In addition to the settlement areas described in option 1, including Goodrich Cross as a further settlement area from which the best sites may be chosen. Goodrich Cross is a settlement of some 53 houses set on each side of the A40.
Option 3- Seeking a wider definition of what the settlement of Goodrich might comprise where it might encompass other areas around the three built-up areas.
Option 4- To provide for a notable expansion beyond the level of required housing growth within whichever of the previous three options is chosen.
Option 5- Do nothing

5.4 As Goodrich and Welsh Bicknor Neighbourhood Plan progressed from options to draft NDP policies, the Plan needed to identify ways in which the Goodrich and Welsh Bicknor effect on the River Wye SAC, Wye Valley Woodlands and Wye Valley and forest of Dean bat sites SAC could be achieved, alongside taking forward the preferred option from the consultation from the community. A list of the options assessed can be found in previous HRA assessments, and the Assessment matrix for the options can be found in appendix 2. The full screening assessment for these options were assessed in February 2018, these can be found in the Regulation 14 HRA report.

Site Options

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

Land opposite Nutshell Caravan Park 6 dwellings
Nutshell Caravan Site 15 dwellings
Land on Marstow Lane 5-7 dwellings
Land behind Dean Swift Close 3 dwellings
Land adjacent to Site 6 8-10 dwellings
Land off Springfield Rd., N of Goodrich Manor 9 dwellings
Land Adjacent to Bryants Court Cottages 8-10 dwellings
Church Field 3 dwellings

Land next to Bryants Court 6-8 dwellings
Land next to Bryants Court 35-40 dwellings
Land next to South Lodge 5 dwellings
Land off Castle Lane 6-10 dwellings

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

Policy GWB1 Promoting Sustainable Development
Policy GWB2 Conserving the landscape and scenic beauty within the Wye Valley AONB
Policy GWB3 Enhancement of the natural environment
Policy GWB4 Protecting Heritage Assets
Policy GWB5 Protection from flood risk
Policy GWB6 Sustainable Design
Policy GWB7 Sewerage Infrastructure
Policy GWB8 Traffic Measures within the Group Parish
Policy GWB9 Highway Design Requirements
Policy GWB10 Broadband and Telecommunication Infrastructure
Policy GWB11 Protection and Enhancement of Community Facilities and Services
Policy GWB12 Contributions to Community Services, Youth Provision and Recreation Facilities
Policy GWB13 Moors Meadow and Church Field Local Green Space
Policy GWB14 Housing Development in Goodrich Village
Policy GWB15 Housing Sites in Goodrich Village
Policy GWB16 Meeting Housing Needs
Policy GWB17 Affordable and Intermediate Homes
Policy GWB18 Tourism Enterprises

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

6.0 Assessments undertaken to date of the emerging Goodrich and Welsh Bicknor NDP policies

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

Screening of the draft plan (Reg14)

- 6.3 The screening matrix took the approach of screening each policy and objective individually, which is consistent with current guidance. The results from the HRA reports for the Herefordshire Local Plan (Core Strategy) were also taken into consideration.
- 6.4 None of the Goodrich and Welsh Bicknor NDP objectives and policies (March 2018) were concluded to be likely to have a significant effect on the European sites. The parish itself does not have the River Wye SAC in the parish, however it is in the parish. The settlement of Goodrich and Welsh Bicknor and site allocations are not in close proximity to the river and unlikely to have a direct significant impact on the SAC. Policy GWB7 and Core Strategy policy SD3 and SD4 together with the Nutrient Management Plan will ensure that development can only occur if these policy requirements are met.
- 6.5 In many cases this is because the policies themselves would not result in development, i.e. they related instead to criteria for development and the SAC itself is not within the parish. In several cases the policies also included measures to help support the natural environment including biodiversity.
- 6.6 It is unlikely that the Goodrich and Welsh Bicknor 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 **Reg14 Goodrich and Welsh Bicknor NDP would not have a likely significant effect on the River Wye (including the River Lugg) SAC, Wye Valley Woodlands and Wye Valley and Forest of Dean Bat sites SAC.**

Screening of modifications to NDP (Reg16)

- 6.8 The Submission NDP (August 2018) incorporates additional policy criteria or wording to add clarity and emphasis throughout the document. Policy which was amended and identified community areas to protect. Policy GWB7 reference to the sewerage network capacity within the village and the potential to phase development. This will give criteria for future applications to meet to support policy SD4 and ensure that the delivery of the Nutrient Management Plan is not compromised.

- 6.9 Modifications made to 3 other policies of the plan are considered to be minor and would not have a significant effect on the results previously assessed. These were points of clarity and minor word changes.
- 6.10 The revised NDP policies are therefore unlikely to result in significant effects on the European site.

7 Assessment of the 'likely significant effects' of the submission Goodrich and Welsh Bicknor NDP following regulation 14 (2018) and implications of *Sweetman* case

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

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

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

8 Conclusions from the Screening Matrix

- 8.1 None of the final Goodrich and Welsh Bicknor Neighbourhood Plan (August 2018) policies were concluded to be likely to have a significant effect on the River Wye SAC, Wye Valley and Forest of Dean Bat Sites and Wye Valley Woodlands SAC.
- 8.2 This is partly down to scale and extent of plan also the Goodrich and Welsh Bicknor Plan small scale site allocations. For the policies contained in the plan there is sufficient policy criteria in Core Strategy policies LD2, SD3 and SD4 to ensure that development can only occur if these criteria are met.
- 8.3 Commitments and completions from April 2011-April 2017 are currently 16 dwellings, leaving a residual figure of 19 to find within the parish of Goodrich and Welsh Bicknor. The plan allocates settlement boundaries for development within Goodrich and Welsh Bicknor. The three allocated sites for development to support up to 15-20 dwellings, along with the development and windfall to meet the housing target of 35 from 2011 to 2031.
- 8.4 There are three allocated sites for development in eastern Goodrich. Due to the location of these areas, i.e. not directly on the river banks or adjacent to a watercourse that feeds into the River, and due to the scale of the sites for homes and businesses being of a small scale and is at the scale of growth that is required by the Herefordshire Core Strategy, these would not have an appreciable effect on the River Wye SAC, i.e. that they were not likely to be significant.
- 8.5 There is limited capacity at Goodrich waste water treatment works within in the neighbourhood area. Therefore new development will need to adhere to the provisions of Policy SD4 of the Core Strategy. In Water Cycle Study addendum it states that the Growth can potentially be accepted within permit flow limit. It is recommended that liaison with the Water Company is needed before significant growth takes place.

- 8.6 In addition, the Nutrient Management Plan for the River Wye SAC should ensure that development within Herefordshire which can be accommodated within existing water discharge permits would not be likely to have a significant effect upon the River Wye SAC.
- 8.7 No mitigation measures have been included within the screening of the policies of the NDP. Policies of the Core Strategy and the NDP will form part of the development plans. A key requirement of the Core Strategy is to meet the Water Framework Directive.
- 8.8 Policy SD4 of the Core Strategy of the NDP indicate that development would not be permitted if wastewater treatment and water quality cannot be assured.
- 8.9 Policy LD2 of the Core Strategy indicates that any development should conserve, restore and enhance biodiversity and geodiversity assets of Herefordshire. Development within close proximity to internationally and local designated sites will need to incorporate sympathetic design components to enhance their nature conservation interests. Goodrich and Welsh Bicknor NDP allocates sites, however the location and scale of the sites have been screened and seen to have an unlikely significant effect on the Wye Valley and Forest of Dean SAC along with the Wye Valley Woodlands SAC. Therefore an AA is not required as the plan is criteria based consisting of mostly protective policies it is determined unlikely to have a significant impact on the SACs. The sites likely impact on the SACs can be determined further at planning application stage when further details of the proposed housing schemes are known.
- 8.10 This review and rescreening in addition to the revisions to the policies from the examination, have been found to be unlikely to result in significant effects on the River Wye SAC. ***It is therefore concluded that the Goodrich and Welsh Bicknor Neighbourhood Plan will not have a likely significant effect on the River Wye SAC, Wye Valley Woodland SAC and Wye Valley and Forest of Dean Bat site SACs.***

9 Identification of other plans and projects which may have 'in-combination' effects

- 9.1 There are a number of potentially relevant plans and projects which may result in in-combination effects with the Core Strategy across Herefordshire, these plans have been reviewed and can be found in Appendix 2 of the publication of the Herefordshire Local Plan Core Strategy Habitats Regulations Assessment (Oct 2015).
- 9.2 It is seen that as this NDP does not go over and beyond the requirements set out in the Core Strategy.
- 9.3 Adjacent neighbourhood plans include Walford and Whitchurch and Ganarew both and are in the process of producing a neighbourhood plan. These plans have not gone over and beyond the requirements set out within the Core Strategy for their area. Marstow are not doing a NDP. The Parish borders with Gloucester and Monmouthshire, no known NDPs are bordering the Parish for these areas.
- 9.4 The HRA for the Core Strategy also identifies that both the Water Cycle Study for Herefordshire, which indicates the potential for planned water abstraction requirements combined with pressures on European Sites from the Core Strategy policies, and the work on the Nutrient Management Plan, to ensure the favourable conservation status of the SAC in respect of phosphate levels as soon as possible and at the latest by 2027, have both been considered as part of the in-combination assessment.
- 9.5 It is unlikely that the Goodrich and Welsh Bicknor Neighbourhood Plan will have any 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 **Goodrich and Welsh Bicknor NDP will not have a likely significant effect on the River Wye SAC, Wye Valley Woodlands and Wye Valley and forest of Dean Bat sites SAC** remains valid.

11.0 Next steps

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

Appendix 1

**Initial Habitat Regulations Assessment and Strategic Environmental
Assessment Screening Notification**

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

Conservation of Habitats and Species Regulations 2010 (d)

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

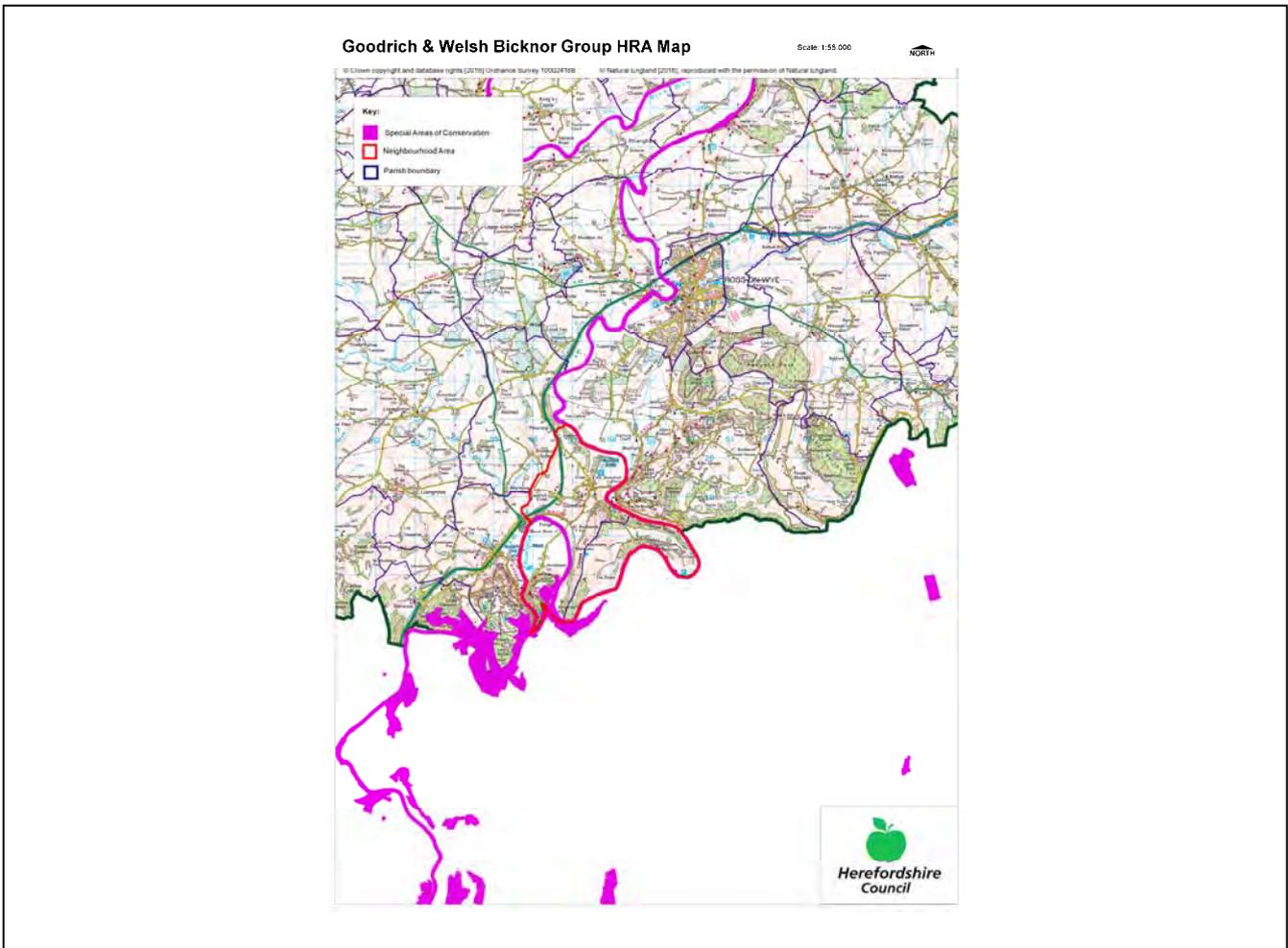
Introduction

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

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

HRA Initial Screening

Map showing relationship of Neighbourhood Area with European Sites (not to scale)



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

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

Downton Gorge SAC:

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

Does the River Clun border the Neighbourhood Area	N	The River Clun does not border the Group Parish
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Wye Valley & Forest of Dean Bat Sites SAC:

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

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

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

European Site

(List only those which are relevant)

- River Wye (including the River Lugg) Special Area of Conservation (SAC)
- Wye Valley & Forest of Dean Bat Sites SAC
- Wye Valley Woodlands SAC

Strategic Environmental Assessment Initial Screening for nature conservation landscape and heritage features

The following environmental features are within or in general proximity to the Goodrich & Welsh Bicknor Group Neighbourhood Area and would need to be taken into account within a Strategic Environmental Assessment. In addition, the NDP will also need to consider the other SEA topics set out in Guidance Note 9a to ensure that the plan does not cause adverse impacts.

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

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

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

Decision Notification:

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

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

Assessment date: 5 August 2016

Assessed by: James Latham

Appendix 1: European Sites

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

Downton Gorge
Site Features: <i>Tilio-Acerion</i> forests of slopes, screes and ravines
Vulnerability data: 10km for air quality associated with poultry units or other intensive agricultural practices.

River Clun
Site Features: Freshwater pearl mussel <i>Margaritifera margaritifera</i>
Vulnerability data: Water quality is important to maintain the site feature. Parishes either side of the River Clun will be affected.

River Wye
Site Features: Water courses of plain to montane levels with the <i>Ranunculion fluitantis</i> and <i>Callitricho-Batrachion</i> vegetation. Transition mires and quaking bogs. White-clawed (or Atlantic Stream) crayfish <i>Austropotamobius pallipes</i> . Sea lamprey <i>Petromyzon marinus</i> . Brook lamprey <i>Lampetra planeri</i> . River lamprey <i>Lampetra fluviatilis</i> . Twaite shad <i>Alosa fallax</i> . Atlantic salmon <i>Salmo salar</i> . Bullhead <i>Cottus gobio</i> . Otter <i>Lutra lutra</i> . Allis shad <i>Alosa alosa</i>
Vulnerability data: Proximity: Developments should not be within 100m of the designated bank. Some developments beyond 100m may also have impacts based on proximity and these issues should be addressed where possible when developing NDP policy and choosing site allocations. Water Quality: Within the whole catchment of the River Wye, which includes the River Lugg, mains drainage issues with regards to water quality are being resolved through the Core Strategy / Local Plan and development of a Nutrient Management Plan. Welsh Water should be consulted to ensure that the proposed growth will be within the limit of their consents. Otters: "An otter will occupy a 'home range', which on fresh waters usually includes a stretch of river as well as associated tributary streams, ditches, ponds, lakes and woodland. The size of a home range depends largely on the availability of food and shelter, and the presence of neighbouring otters. On rivers, a male's home range may be up to 40km or more of watercourse and associated areas; females have smaller ranges (roughly half the size) and favour quieter locations for breeding, such as tributary streams. Otters without an established home range are known as 'transients'. They are mostly juveniles looking for a territory of their own, or adults that have been pushed out of their territories. Transient otters may use an area for a short while, but they will move on if conditions are not suitable or if they are driven away by resident otters. Transients will have been important in extending the range of otters, but they are very difficult to identify from field signs. Within a home range an otter may use many resting sites. These include above-ground shelters, such as stands of scrub or areas of rank grass, and underground 'holts' – for example, cavities under tree roots and dry drainage pipes."

Wye Valley and Forest of Dean Bat Sites

Site Features: Annex II species that are a primary reason for site selection: Lesser horseshoe bat *Rhinolophus hipposideros*. Greater horseshoe bat *Rhinolophus ferrumequinum*

Vulnerability data: Lesser Horseshoe bats are known to migrate between 5km and 10km between their summer and winter roosts. The Lesser Horseshoe Bat is vulnerable to disturbance; light pollution; and habitat loss. Check with the planning ecologist for other issues.

Greater Horseshoe bats are known to migrate between 20-30km between their summer and winter roosts.

NDPs closest to the European Site will need to consider:

Woodland habitat buffer.

Lesser Horseshoe Bat: Old buildings; woodland locations; sheltered valleys, extensive deciduous woods or dense scrub, close to roost sites. In areas of fragmented habitats, linear habitats such as hedgerows are important corridors. Vulnerable to loss or disturbance of both summer and winter roosts and removal of linear habitat.

Greater Horseshoe Bat: Large buildings, pasture, edge of mixed deciduous woodland and hedgerows. Mixed land-use especially south-facing slopes, favours beetles, moths and insects they feed on. During the winter they depend on caves, abandoned mines and other underground sites for undisturbed hibernation. A system/series of sites required. Vulnerable to loss of insect food supply, due to insecticide use, changing farming practices and loss of broad-leaved tree-cover and loss / disturbance of underground roosts sites.

Wye Valley Woodlands

Site Features: Annex I habitats that are a primary reason for site selection: Beech forests *Asperulo-Fagetum*, *Tilio-Acerion* forests of slopes, screes and ravines, *Taxus baccata* woods of the British Isles. Annex II species present as a qualifying feature, but not a primary reason for site selection: Lesser horseshoe bat *Rhinolophus hipposideros*, 51-100 residents

Vulnerability data: Lesser Horseshoe bats are known to migrate between 5km and 10km between their summer and winter roosts. The Lesser Horseshoe Bat is vulnerable to disturbance; light pollution; and habitat loss. Check with the planning ecologist for other issues. NDPs closest to the European Site will need to consider: Woodland habitat buffer. Lesser Horseshoe Bat: Old buildings; woodland locations; sheltered valleys, extensive deciduous woods or dense scrub, close to roost sites. In areas of fragmented habitats, linear habitats such as hedgerows are important corridors. Vulnerable to loss or disturbance of both summer and winter roosts and removal of linear habitat.

Appendix 2

GOODRICH AND WELSH BICKNOR GROUP OPTIONS

<p>Option 1- Locating housing sites to meet the required level within or adjacent to the two settlement areas Goodrich Church and Goodrich Cruse.</p>
<p>Option 2- In addition to the settlement areas described in option 1, including Goodrich Cross as a further settlement area from which the best sites may be chosen. Goodrich Cross is a settlement of some 53 houses set on each side of the A40.</p>
<p>Option 3- Seeking a wider definition of what the settlement of Goodrich might comprise where it might encompass other areas around the three built-up areas.</p>
<p>Option 4- To provide for a notable expansion beyond the level of required housing growth within whichever of the previous three options is chosen.</p>
<p>Option 5- Do nothing</p>

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

<p>Land opposite Nutshell Caravan Park 6 dwellings</p>
<p>Nutshell Caravan Site 15 dwellings</p>
<p>Land on Marstow Lane 5-7 dwellings</p>
<p>Land behind Dean Swift Close 3 dwellings</p>
<p>Land adjacent to Site 6 8-10 dwellings</p>
<p>Land off Springfield Rd., N of Goodrich Manor 9 dwellings</p>
<p>Land Adjacent to Bryants Court Cottages 8-10 dwellings</p>
<p>Church Field 3 dwellings</p>
<p>Land next to Bryants Court 6-8 dwellings</p>
<p>Land next to Bryants Court 35-40 dwellings</p>
<p>Land next to South Lodge 5 dwellings</p>
<p>Land off Castle Lane 6-10 dwellings</p>

Appendix 3

HRA Screening of Significant Changes (Objectives, Options and Policies) following Draft Plan (reg 14) Consultation

Parish Council Name: Goodrich and Welsh Bicknor Group

NDP Title: Goodrich and Welsh Bicknor Group Neighbourhood Plan

Date undertaken: August 2018

NDP objectives, options and policies significantly changed following Draft Plan Consultation	HRA Screening of significant changes (objectives, options and policies) following Draft Plan Consultation	Likely activities (operations) to result as a consequence of the objective/option/policy	Likely effect if option implemented. Could they have Likely Significant Effects (LSE) on European Sites?	European Sites potentially affected	Would it be possible that it would result in any LSE?	Requirement for an Appropriate Assessment
<p>Policy GWB1 Promoting Sustainable Development</p>	<p>Increase in water consumption. Non-physical disturbance during construction phase. Physical damage of disturbance on a localised scale. Further protection of AONB</p>	<p>Unlikely that there will be any significant effects on the European Site. All developments are required to meet the criteria of Policy LD2 to protect biodiversity and wildlife, and SD4 which seeks to ensure water quality of the SAC is not detrimentally effected</p>	<p>River Wye (including the Lugg SAC) The river runs along the boundary of the parish. Wye Valley and Forest of Dean Bat Sites SAC. The Bat sites SAC are 5.5km away from the Group Parish. Wye Valley Woodlands SAC are within the group parish.</p>	<p>No</p>	<p>Not required. The scale and extent of potential housing development is unlikely to have a significant impact on the SAC. Implementation of Core Strategy policy SD4, LD2, SD1 to grant planning permission will ensure water quality issues are addressed. Impact on the Wye Valley Woodlands and Wye Valley and Forest of Dean Bat sites SAC can be further assessed, when further details are known regarding new housing development. This will be assessed on a case by case basis.</p>	

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<p>Policy GWB2 Conserving the landscape and scenic beauty within the Wye Valley AONB</p>	<p>Safeguard existing landscape against inappropriate development within the Wye Valley AONB.</p> <p>Encouragement of sustainable development which preserves and protects the landscape, environment and habitats.</p>	<p>Unlikely that there will be any significant effects on the European Site. All developments are required to meet the criteria of Policy LD2 to protect biodiversity and wildlife, and SD4 which seeks to ensure water quality of the SAC is not detrimentally effected.</p>	<p>River Wye (including the Lugg SAC) The river runs along the boundary of the parish.</p> <p>Wye Valley and Forest of Dean Bat Sites SAC. The Bat sites SAC are 5.5km away from the Group Parish.</p> <p>Wye Valley Woodlands SAC are within the group parish.</p>	<p>No</p>	<p>Not required. This policy strives to protect and enhance the natural landscape and natural environment, this could potentially have a positive impact on the SAC sites. Implementation of Core Strategy policy SD4, LD2, SD1 to grant planning permission will ensure water quality issues are addressed.</p>
<p>Policy GWB3 Enhancement of the natural environment</p>	<p>Protection and enhancement of the natural environment.</p> <p>Encouragement of sustainable development which preserves and protects the landscape, environment and habitats.</p> <p>Protection against impact on the amenity of Goodrich Castle and Coppet Hill Local Nature Reserve.</p>	<p>None identified</p>	<p>River Wye (including the Lugg SAC) The river runs along the boundary of the parish.</p> <p>Wye Valley and Forest of Dean Bat Sites SAC. The Bat sites SAC are 5.5km away from the Group Parish.</p> <p>Wye Valley Woodlands SAC are within the group parish.</p>	<p>No</p>	<p>Not required. This policy strives to protect and enhance the natural environment, this could potentially have a positive impact on the SAC sites. Implementation of Core Strategy policy SD4, LD2, SD1 to grant planning permission will ensure water quality issues are addressed.</p>
<p>Policy GWB4 Protecting Heritage Assets</p>	<p>Protection and enhancement of heritage assets within Goodrich and Welsh Bicknor.</p> <p>Sensitive housing development nearby heritage assets.</p>	<p>Unlikely that there will be any significant effects on the European Site. All developments are required to meet the criteria of Policy LD2 to</p>	<p>River Wye (including the Lugg SAC) The river runs along the boundary of the parish.</p> <p>Wye Valley and Forest</p>	<p>No</p>	<p>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</p>

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	<p>Unregistered parks and gardens protected against insensitive development</p> <p>Positively promoting sensitive conversions of historic farmsteads</p>	<p>protect biodiversity and wildlife, and SD4 which seeks to ensure water quality of the SAC is not detrimentally effected.</p>	<p>of Dean Bat Sites SAC. The Bat sites SAC are 5.5km away from the Group Parish.</p> <p>Wye Valley Woodlands SAC are within the group parish.</p>		<p>Strategy policy SD4, LD2, SD1 to grant planning permission will ensure water quality issues are addressed.</p>
<p>Policy GWB5</p> <p>Protection from flood risk</p>	<p>Strive to reduce impact of flooding within Goodrich and Welsh Bicknor.</p> <p>New development designed to appropriately reduce flood risk.</p> <p>Sustainable design promoted.</p> <p>Infrastructure development phased in line with infrastructure works within the plan period.</p> <p>Support for SUDs to be used in new development.</p>	<p>Unlikely that there will be any significant effects on the European Site. All developments are required to meet the criteria of Policy LD2 to protect biodiversity and wildlife, and SD4 which seeks to ensure water quality of the SAC is not detrimentally effected</p>	<p>River Wye (including the Lugg SAC) The river runs along the boundary of the parish.</p> <p>Wye Valley and Forest of Dean Bat Sites SAC. The Bat sites SAC are 5.5km away from the Group Parish.</p> <p>Wye Valley Woodlands SAC are within the group parish.</p>	No	<p>Not required. This policy will not lead to development instead it provides criteria for development for drainage and flood management in the parish.</p> <p>The implementation of Core Strategy policy SD4, LD2, SD1 to grant planning permission will ensure water quality issues are addressed.</p>
<p>Policy GWB6</p> <p>Sustainable Design</p>	<p>Promotion of sustainable design.</p> <p>Sustainable development encouraged.</p> <p>The built character is protected along with landscape character.</p> <p>Utilisation and development of sustainable building design</p> <p>Promotion of sustainable transport measures</p>	<p>None identified.</p>	<p>River Wye (including the Lugg SAC) The river runs along the boundary of the parish.</p> <p>Wye Valley and Forest of Dean Bat Sites SAC. The Bat sites SAC are 5.5km away from the Group Parish.</p> <p>Wye Valley Woodlands</p>	No	<p>Not required. This policy will not lead to development instead it provides sustainable design criteria for developments to adhere to.</p>

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	Minimise waste production		SAC are within the group parish.		
Policy GWB7 Sewerage Infrastructure	Utilisation of existing sewage infrastructure Support developer contributions for infrastructure improvement.	Unlikely that there will be any significant effects on the European Site. All developments are required to meet the criteria of Policy LD2 to protect biodiversity and wildlife, and SD4 which seeks to ensure water quality of the SAC is not detrimentally effected	River Wye (including the Lugg SAC) The river runs along the boundary of the parish. Wye Valley and Forest of Dean Bat Sites SAC. The Bat sites SAC are 5.5km away from the Group Parish. Wye Valley Woodlands SAC are within the group parish.	No	Not required. This policy will not lead to development instead it provides criteria for new development to adhere to in regards to sewerage.
Policy GWB8 Traffic Measures within the Group Parish	Promotion of safer roads. Improved sustainable modes of transport such as cycling, walking, and public transport links. Decrease in nonphysical disturbances- noise Increase in walking and cycling. Decrease in traffic accidents. 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) The river runs along the boundary of the parish. Wye Valley and Forest of Dean Bat Sites SAC. The Bat sites SAC are 5.5km away from the Group Parish. Wye Valley Woodlands SAC are within the group parish.	No	Not required. This policy will not lead to development instead it provides traffic alleviation measures for developments to adhere to

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<p>Policy GWB9 Highway Design Requirements</p>	<p>Sets out criteria for highway design.</p> <p>Sustainable development encouraged.</p> <p>Decrease in nonphysical disturbances- noise</p> <p>Increase in walking and cycling.</p> <p>Decrease in traffic accidents.</p> <p>Development of transport infrastructure</p> <p>Traffic Calming measures</p> <p>Improvement of road safety</p>	<p>Unlikely that there will be any significant effects on the European Site. All developments are required to meet the criteria of Policy LD2 to protect biodiversity and wildlife, and SD4 which seeks to ensure water quality of the SAC is not detrimentally effected.</p>	<p>River Wye (including the Lugg SAC) The river runs along the boundary of the parish.</p> <p>Wye Valley and Forest of Dean Bat Sites SAC. The Bat sites SAC are 5.5km away from the Group Parish.</p> <p>Wye Valley Woodlands SAC are within the group parish.</p>	<p>No</p>	<p>Not required. This policy will not lead to development instead it provides highway design requirements for developments to adhere to.</p> <p>Implementation of Core Strategy policy SD4, LD2, SD1 to grant planning permission will ensure water quality issues are addressed.</p>
<p>Policy GWB10 Broadband and Telecommunication Infrastructure</p>	<p>Broadband strengthen and improved</p> <p>Increase in local businesses and productivity</p> <p>Increase in working from home</p> <p>Greater connectivity to the county, country and globe.</p> <p>Small decrease in vehicular usage</p>	<p>Unlikely that there will be any significant effects on the European Site. All developments are required to meet the criteria of Policy LD2 to protect biodiversity and wildlife, and SD4 which seeks to ensure water quality of the SAC is not detrimentally effected.</p>	<p>River Wye (including the Lugg SAC) The river runs along the boundary of the parish.</p> <p>Wye Valley and Forest of Dean Bat Sites SAC. The Bat sites SAC are 5.5km away from the Group Parish.</p> <p>Wye Valley Woodlands SAC are within the group parish.</p>	<p>No</p>	<p>Not required. This policy will not lead to development instead it provides broadband and telecommunication criteria, for new development to adhere to.</p>

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<p>Policy GWB11 Protection and Enhancement of Community Facilities and Services</p>	<p>Community facilities and services protected and improved.</p> <p>Increase of visitors using facilities.</p> <p>More activities and events</p> <p>Greater social mobility</p> <p>Continued use of community services.</p>	<p>Unlikely that there will be any significant effects on the European Site. All developments are required to meet the criteria of Policy LD2 to protect biodiversity and wildlife, and SD4 which seeks to ensure water quality of the SAC is not detrimentally effected.</p>	<p>River Wye (including the Lugg SAC) The river runs along the boundary of the parish.</p> <p>Wye Valley and Forest of Dean Bat Sites SAC. The Bat sites SAC are 5.5km away from the Group Parish.</p> <p>Wye Valley Woodlands SAC are within the group parish.</p>	<p>No</p>	<p>No, although this policy could result in the re development of new community facilities or the loss of existing provision to new uses, which depending on location could have potential effect on the Wye Valley and Forest of Dean Bat sites. However, sufficient policy safeguards are in place within the Local Plan (Core Strategy) and with the inclusion of additional wording in the NDP policy ensure there are no significant effects on the River Wye.</p>
<p>Policy GWB12 Contributions to Community Services, Youth Provision and Recreation Facilities</p>	<p>Support and upkeep of existing local community facilities.</p> <p>Promote new development of community facilities.</p> <p>Increase in vehicular movements.</p> <p>Increase in nonphysical disturbance.</p>	<p>None identified.</p>	<p>River Wye (including the Lugg SAC) The river runs along the boundary of the parish.</p> <p>Wye Valley and Forest of Dean Bat Sites SAC. The Bat sites SAC are 5.5km away from the Group Parish.</p> <p>Wye Valley Woodlands SAC are within the group parish.</p>	<p>No</p>	<p>Not required. This policy will not lead to development, instead it stipulates criteria for contributions from new development towards community facilities. The implementation of Core Strategy policy SD4, LD2, SD1 to grant planning permission will ensure water quality issues are addressed.</p>

<p>Policy GWB13 Moors Meadow and Church Field Local Green Space</p>	<p>Protection of identified green space.</p> <p>Increase in recreational activities</p> <p>Protection of Moors Meadow for Local Greenspace</p> <p>Protection of Land immediately to the south west of St Giles Church</p>	<p>Unlikely that there will be any significant effects on the European Site. All developments are required to meet the criteria of Policy LD2 to protect biodiversity and wildlife, and SD4 which seeks to ensure water quality of the SAC is not detrimentally effected</p>	<p>River Wye (including the Lugg SAC) The river runs along the boundary of the parish.</p> <p>Wye Valley and Forest of Dean Bat Sites SAC. The Bat sites SAC are 5.5km away from the Group Parish.</p> <p>Wye Valley Woodlands SAC are within the group parish.</p>	<p>No</p>	<p>Not required. This policy will not lead to development instead it safeguards local green space in Moors Meadow and Church field as local greenspace. Since regulation 14 the greenspace has been extended in or to protect all of Church field.</p>
<p>Policy GWB14 Housing Development in Goodrich Village</p>	<p>New housing development for up to 30 houses within the designation settlement boundaries of Goodrich and Welsh Bicknor.</p> <p>Increase in vehicle traffic.</p> <p>Increased demand for water abstraction and sewage treatment.</p> <p>Increase in vehicular usage.</p> <p>Increase in nonphysical disturbance.</p>	<p>Depending on type, location of infrastructure.</p> <p>Physical damage of disturbance.</p> <p>Non-physical disturbance such as noise.</p>	<p>River Wye (including the Lugg SAC) The river runs along the boundary of the parish.</p> <p>Wye Valley and Forest of Dean Bat Sites SAC. The Bat sites SAC are 5.5km away from the Group Parish.</p> <p>Wye Valley Woodlands SAC are within the group parish.</p>	<p>No</p>	<p>Not required. The scale and extent of potential housing development is unlikely to have a significant impact on the SAC. Implementation of Core Strategy policy SD4, LD2, SD1 to grant planning permission will ensure water quality issues are addressed. Impact on the Wye Valley Woodlands and Wye Valley and Forest of Dean Bat sites SAC can be further assessed, when further details are known regarding new housing development. This will be assessed on a case by case basis.</p>

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<p>Policy GWB15 Housing Sites in Goodrich Village</p>	<p>Three housing sites identified within Goodrich Village.</p> <p>Promotion of achieving housing target.</p> <p>Increased vehicle traffic</p> <p>Increased demand for water abstraction and sewage treatment</p> <p>Sustainable housing growth</p>	<p>Small scale housing development.</p> <p>Housing, infrastructure development Possible increase in recreation activities, vehicular movements and demand for water abstraction and treatment.</p> <p>Physical damage of disturbance on a localised scale.</p> <p>Non-physical disturbance such as noise</p>	<p>River Wye (including the Lugg SAC) The river runs along the boundary of the parish.</p> <p>Wye Valley and Forest of Dean Bat Sites SAC. The Bat sites SAC are 5.5km away from the Group Parish.</p> <p>Wye Valley Woodlands SAC are within the group parish.</p>	<p>No</p>	<p>Not required. The scale and location of potential housing development is unlikely to have a significant impact on the SAC. Implementation of Core Strategy policy SD4, LD2, SD1 to grant planning permission will ensure water quality issues are addressed. Impact on the Wye Valley Woodlands and Wye Valley and Forest of Dean Bat sites SAC can be further assessed, when further details are known regarding new housing development. This will be assessed on a case by case basis.</p>
<p>Policy GWB16 Meeting Housing Needs</p>	<p>Housing sites identified.</p> <p>Promotion of achieving housing target.</p> <p>Increased vehicle traffic</p> <p>Increased demand for water abstraction and sewage treatment</p> <p>Sustainable housing growth</p>	<p>Unlikely that there will be any significant effects on the European Site. All developments are required to meet the criteria of Policy LD2 to protect biodiversity and wildlife, and SD4 which seeks to ensure water quality of the SAC is not detrimentally effected</p>	<p>River Wye (including the Lugg SAC) The river runs along the boundary of the parish.</p> <p>Wye Valley and Forest of Dean Bat Sites SAC. The Bat sites SAC are 5.5km away from the Group Parish.</p> <p>Wye Valley Woodlands SAC are within the group parish.</p>	<p>No</p>	<p>Not required. This policy will not lead to development instead it provides criteria to ensure housing needs are met in the group parish.</p>

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<p>Policy GWB17 Affordable and Intermediate Homes</p>	<p>Affordable and intermediate housing promoted and identified within Goodrich and Welsh Bicknor.</p> <p>Increased vehicle traffic</p> <p>Increased demand for water abstraction and sewage treatment</p> <p>Sustainable housing growth</p> <p>Mixture of people living within the group parish</p>	<p>Unlikely that there will be any significant effects on the European Site. All developments are required to meet the criteria of Policy LD2 to protect biodiversity and wildlife, and SD4 which seeks to ensure water quality of the SAC is not detrimentally effected</p>	<p>River Wye (including the Lugg SAC) The river runs along the boundary of the parish.</p> <p>Wye Valley and Forest of Dean Bat Sites SAC. The Bat sites SAC are 5.5km away from the Group Parish.</p> <p>Wye Valley Woodlands SAC are within the group parish.</p>	<p>No</p>	<p>Not required. This policy will not lead to development instead it provides criteria framework for affordable and intermediate homes within the parish.</p>
<p>Policy GWB18 Tourism Enterprises</p>	<p>Tourism promoted within Goodrich and Welsh Bicknor</p> <p>Small scale tourism facilities provided</p> <p>Increased vehicle traffic</p> <p>Increased demand for water abstraction and sewage treatment</p>	<p>Unlikely that there will be any significant effects on the European Site. All developments are required to meet the criteria of Policy LD2 to protect biodiversity and wildlife, and SD4 which seeks to ensure water quality of the SAC is not detrimentally effected</p>	<p>River Wye (including the Lugg SAC) The river runs along the boundary of the parish.</p> <p>Wye Valley and Forest of Dean Bat Sites SAC. The Bat sites SAC are 5.5km away from the Group Parish.</p> <p>Wye Valley Woodlands SAC are within the group parish.</p>	<p>No</p>	<p>No, although this policy could result in new tourism development, there are sufficient policy safeguards within the NDP and Core Strategy to help to ensure there are no likely significant effects on the Wye Valley and Forest of Dean bat sites SAC, Wye Valley and Forest of Dean SAC. However this can be further assessed at planning application stage, when more details such as location and materials are known.</p>

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<p>Policy GWB19 Scale of Economic Development</p>	<p>Business growth Local job growth Increase in vehicle traffic. Increased demand for water abstraction and sewage treatment. Increase in vehicular usage. Increase in nonphysical disturbance.</p>	<p>Small scale employment growth and 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.</p>	<p>River Wye (including the Lugg SAC) The river runs along the boundary of the parish. Wye Valley and Forest of Dean Bat Sites SAC. The Bat sites SAC are 5.5km away from the Group Parish. Wye Valley Woodlands SAC are within the group parish.</p>	<p>No</p>	<p>Not required. 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.</p>
<p>Policy GWB20 Farm Diversification</p>	<p>Increased demand for water abstraction and sewage treatment. Increase in vehicular usage and traffic Increase in nonphysical disturbance. Increase in business Potential job creation</p>	<p>Small scale business development and potential employment growth. Physical damage of disturbance on a localised scale. Non-physical disturbance such as noise. Uncertain as to the impacts upon the River Wye SAC dependent on the location of any development.</p>	<p>River Wye (including the Lugg SAC) The river runs along the boundary of the parish. Wye Valley and Forest of Dean Bat Sites SAC. The Bat sites SAC are 5.5km away from the Group Parish. Wye Valley Woodlands SAC are within the group parish.</p>	<p>No</p>	<p>Not required. The scale and extent of farm diversification t 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.</p>

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<p>Policy GWB21 Working from Home</p>	<p>Encourage of small domestic based employment facilities.</p> <p>Promotion of business development</p> <p>Job creation in local area</p> <p>Small reduction in vehicular usage.</p>	<p>Small scale employment growth and development</p> <p>Physical damage of disturbance on a localised scale.</p> <p>Non-physical disturbance such as noise.</p> <p>Uncertain as to the impacts upon the River Wye SAC dependent on the location of any development.</p>	<p>River Wye (including the Lugg SAC) The river runs along the boundary of the parish.</p> <p>Wye Valley and Forest of Dean Bat Sites SAC. The Bat sites SAC are 5.5km away from the Group Parish.</p> <p>Wye Valley Woodlands SAC are within the group parish.</p>	<p>No</p>	<p>Not required. The scale and extent of potential employment development at home is unlikely to have a significant impact on the SAC due to its domestic scale. There are sufficient policy safeguards within the NDP and Core Strategy to help to ensure there are no likely significant effects on the Wye Valley and Forest of Dean bat sites SAC, Wye Valley and Forest of Dean SAC. However this can be further assessed at planning application stage, when more details such as location and materials are known.</p>
<p>Site Options</p>					
<p>Site option 1 – Land opposite dean swift close SELECTED</p>	<p>Develop 6 dwellings</p> <p>Increase in water usage, abstraction and sewage treatment</p> <p>Loss of greenfield land</p> <p>Increase in traffic and parking demands</p> <p>Demand in broadband and communication services.</p> <p>Light pollution</p> <p>Increase in non-physical disturbances during</p>	<p>Pursuing this option would give greater certainty over future development within the area particularly within the River Wye catchment. However the location of the site and impact of road noise and traffic may prove difficult in delivering this site.</p>	<p>River Wye (including the Lugg SAC).</p> <p>Wye Valley and Forest of Dean Bat Sites SAC.</p> <p>Wye Valley Woodlands SAC</p>	<p>No</p>	<p>No. Housing development on this site is unlikely to have an impact on the River Wye sac, Wye Valley Woodlands and Wye Valley and Forest of Dean bat sites SACs. However due to the location and proximity to a major A road, it could prove difficult in delivering this site due to pollution and noise concerns.</p>

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	construction				
<p>Site option 2- Land comprising the former Nutshell Caravan Park SELECTED</p>	<p>Develop 15 dwellings</p> <p>Increase in water usage, abstraction and sewage treatment</p> <p>Increase in traffic and parking demands</p> <p>Demand in broadband and communication services.</p> <p>Light pollution</p> <p>Increase in non-physical disturbances during construction</p>	<p>Pursuing this option would give greater certainty over future development within the area particularly within the River Wye catchment. However the location of the site and impact of road noise and traffic may prove difficult in delivering this site.</p>	<p>River Wye (including the Lugg SAC).</p> <p>Wye Valley and Forest of Dean Bat Sites SAC.</p> <p>Wye Valley Woodlands SAC</p>	No	<p>No. Housing development on this site will not have an impact on the River Wye sac, Wye Valley Woodlands and Wye Valley and Forest of Dean bat sites SACs.</p>
<p>Site option 3</p>	<p>Develop 5-7 dwellings</p> <p>Increase in water usage, abstraction and sewage treatment</p> <p>Increase in traffic and parking demands</p> <p>Demand in broadband and communication services.</p> <p>Light pollution</p> <p>Increase in non-physical disturbances during construction</p>	<p>Pursuing this option would give greater certainty over future development within the area particularly within the River Wye catchment. Scale and location of this site is quite far from the existing settlement.</p>	<p>River Wye (including the Lugg SAC).</p> <p>Wye Valley and Forest of Dean Bat Sites SAC.</p> <p>Wye Valley Woodlands SAC</p>	No	<p>No. Housing development on this site due to the scale and location will not have an impact on the River Wye sac, Wye Valley Woodlands and Wye Valley and Forest of Dean bat sites SACs</p>

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<p>Site option 4</p>	<p>Develop 3 dwellings</p> <p>Increase in water usage, abstraction and sewage treatment</p> <p>Increase in traffic and parking demands</p> <p>New housing for dwellings located on the edge of settlement.</p> <p>Demand in broadband and communication services.</p> <p>Light pollution</p> <p>Increase in non-physical disturbances during construction</p>	<p>Pursuing this option would give greater certainty over future development within the area particularly within the River Wye catchment. Scale and location of this site is on the edge of the existing settlement.</p>	<p>River Wye (including the Lugg SAC).</p> <p>Wye Valley and Forest of Dean Bat Sites SAC.</p> <p>Wye Valley Woodlands SAC</p>	<p>No</p>	<p>No. Housing development on this site due to the scale and location will not have an impact on the River Wye sac, Wye Valley Woodlands and Wye Valley and Forest of Dean bat sites SACs</p>
<p>Site option 5</p>	<p>Develop 8-10 dwellings</p> <p>Increase in water usage, abstraction and sewage treatment</p> <p>Increase in traffic and parking demands</p> <p>Demand in broadband and communication services.</p> <p>Light pollution</p> <p>Increase in non-physical disturbances during construction</p>	<p>Pursuing this option would give greater certainty over future development within the area particularly within the River Wye catchment.</p>	<p>River Wye (including the Lugg SAC).</p> <p>Wye Valley and Forest of Dean Bat Sites SAC.</p> <p>Wye Valley Woodlands SAC</p>	<p>No</p>	<p>No. Housing development on this site due to the scale and location will not have an impact on the River Wye sac, Wye Valley Woodlands and Wye Valley and Forest of Dean bat sites SACs</p>

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<p>Site option 6- Land off Springfield Road north of Goodrich Manor SELECTED</p>	<p>Develop 9 dwellings</p> <p>Increase in water usage, abstraction and sewage treatment</p> <p>Increase in traffic and parking demands</p> <p>Demand in broadband and communication services.</p> <p>Light pollution</p> <p>Increase in non-physical disturbances during construction</p>	<p>Pursuing this option would give greater certainty over future development within the area particularly within the River Wye catchment.</p>	<p>River Wye (including the Lugg SAC).</p> <p>Wye Valley and Forest of Dean Bat Sites SAC.</p> <p>Wye Valley Woodlands SAC</p>	<p>No</p>	<p>No. Housing development on this site will not have an impact on the River Wye sac, Wye Valley Woodlands and Wye Valley and Forest of Dean bat sites SACs.</p>
<p>Site option 7</p>	<p>Develop 8-10 dwellings</p> <p>Increase in water usage, abstraction and sewage treatment</p> <p>Increase in traffic and parking demands</p> <p>Demand in broadband and communication services.</p> <p>Light pollution</p> <p>Increase in non-physical disturbances during construction</p>	<p>Pursuing this option would give greater certainty over future development within the area particularly within the River Wye catchment. It is located on the edge of an existing settlement however may cause detrimental impact on the existing transport infrastructure.</p>	<p>River Wye (including the Lugg SAC).</p> <p>Wye Valley and Forest of Dean Bat Sites SAC.</p> <p>Wye Valley Woodlands SAC</p>	<p>No</p>	<p>No. Housing development on this site will not have an impact on the River Wye sac, Wye Valley Woodlands and Wye Valley and Forest of Dean bat sites SACs</p>
<p>Site option 8</p>	<p>Develop 3 dwellings</p> <p>Increase in water usage, abstraction and sewage</p>	<p>Although this small site is located within the existing settlement it may have issues with access and</p>	<p>River Wye (including the Lugg SAC).</p> <p>Wye Valley and Forest of</p>	<p>No</p>	<p>No. Housing development on this site due to the scale and location will not have an impact on the River Wye sac,</p>

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	<p>treatment</p> <p>Increase in traffic and parking demands</p> <p>Demand in broadband and communication services.</p> <p>Light pollution</p> <p>Increase in non-physical disturbances during construction</p>	<p>impact on neighbouring amenity.</p>	<p>Dean Bat Sites SAC.</p> <p>Wye Valley Woodlands SAC</p>		<p>Wye Valley Woodlands and Wye Valley and Forest of Dean bat sites SACs. However the site is used by the community as a place for recreation therefore may benefit as local greenspace rather than a housing site.</p>
Site option 9	<p>Develop 6-8 dwellings land next to bryants court</p> <p>Increase in water usage, abstraction and sewage treatment</p> <p>Increase in traffic and parking demands</p> <p>Demand in broadband and communication services.</p> <p>Light pollution</p> <p>Increase in non-physical disturbances during construction</p>	<p>Pursuing this option would give greater certainty over future development within the area particularly within the River Wye catchment. It is located on the edge of an existing settlement however may cause detrimental impact on the existing transport infrastructure.</p>	<p>River Wye (including the Lugg SAC).</p> <p>Wye Valley and Forest of Dean Bat Sites SAC.</p> <p>Wye Valley Woodlands SAC</p>	No	<p>No. Housing development on this site will not have an impact on the River Wye sac, Wye Valley Woodlands and Wye Valley and Forest of Dean bat sites SACs</p>
Site option 10	<p>Develop 35-40 dwellings</p> <p>Increase in water usage, abstraction and sewage treatment</p> <p>Loss of greenfield land</p>	<p>Uncertain: the location and scale of development is quite large if the whole site was developed. It may give rise to likely significant effects, and that development may</p>	<p>River Wye (including the Lugg SAC).</p> <p>Wye Valley and Forest of Dean Bat Sites SAC.</p> <p>Wye Valley Woodlands</p>	No	<p>Uncertain. The scale and extent of development on this site may to have a significant impact on the SACs</p> <p>However all of site is not recommended to be</p>

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	<p>Increase in traffic and parking demands</p> <p>New housing for dwellings located on the edge of settlement.</p> <p>Demand in broadband and communication services.</p> <p>Light pollution</p> <p>Increase in non-physical disturbances during construction</p>	<p>result in the loss of foraging space in the form of an open agricultural field. However further details of development proposed need to be known to determine its true effect. Part of the site may have a less significant impact if only some of the site was developed and have less impact on the existing infrastructure.</p>	SAC		<p>developed, as it is of a large scale and will impact the resources for growth in accordance Core Strategy policies RA1 and RA2.</p>
Site option 11	<p>Develop 5 dwellings</p> <p>Increase in water usage, abstraction and sewage treatment</p> <p>Increase in traffic and parking demands</p> <p>Demand in broadband and communication services.</p> <p>Light pollution</p> <p>Increase in non-physical disturbances during construction</p>	<p>This site is located far from the existing settlement and may not be considered as a sustainable location for development.</p>	<p>River Wye (including the Lugg SAC).</p> <p>Wye Valley and Forest of Dean Bat Sites SAC.</p> <p>Wye Valley Woodlands SAC</p>	No	<p>No. Housing development on this site will not have an impact on the River Wye sac, Wye Valley Woodlands and Wye Valley and Forest of Dean bat sites SACs</p>
Site option 12	<p>Develop 6-10 dwellings</p> <p>Increase in water usage, abstraction and sewage treatment</p>	<p>This site is located on the edge of the existing settlement. Pursuing this option would give greater certainty over future development within the</p>	<p>River Wye (including the Lugg SAC).</p> <p>Wye Valley and Forest of Dean Bat Sites SAC.</p>	No	<p>No. Housing development on this site will not have an impact on the River Wye sac, Wye Valley Woodlands and Wye Valley and Forest of Dean bat sites SACs</p>

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	<p>Loss of greenfield land</p> <p>Increase in traffic and parking demands</p> <p>Demand in broadband and communication services.</p> <p>Light pollution</p> <p>Increase in non-physical disturbances during construction</p>	<p>area particularly within the River Wye catchment</p>	<p>Wye Valley Woodlands SAC</p>		
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Appendix 4

HRA Consultation Feedback

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

Parish Council Name: Goodrich and Welsh Bicknor Group Parish Council

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

Details of consultation: *Regulation 14*

Consultation date: 12 March to 24 April 2018

Consultation title: Goodrich and Welsh Bicknor Regulation 14 consultation

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

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Appendix 5

Date: 17 April 2018
Our ref: 244407
Your ref: Goodrich & Welsh Bicknor NDP



James Latham
Herefordshire Council

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

BY EMAIL ONLY

T 0300 060 3900

Dear Mr Latham,

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

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

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

Habitats Regulations Assessment

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

- River Wye SAC.

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

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

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

Yours sincerely

Tom Amos
Planning for a Better Environment
West Midlands Team