

Habitats Regulations Assessment

Report for:

Stretton Sugwas Neighbourhood Area

November 2019



Stretton Sugwas Neighbourhood Plan HRA

HRA Screening Assessment

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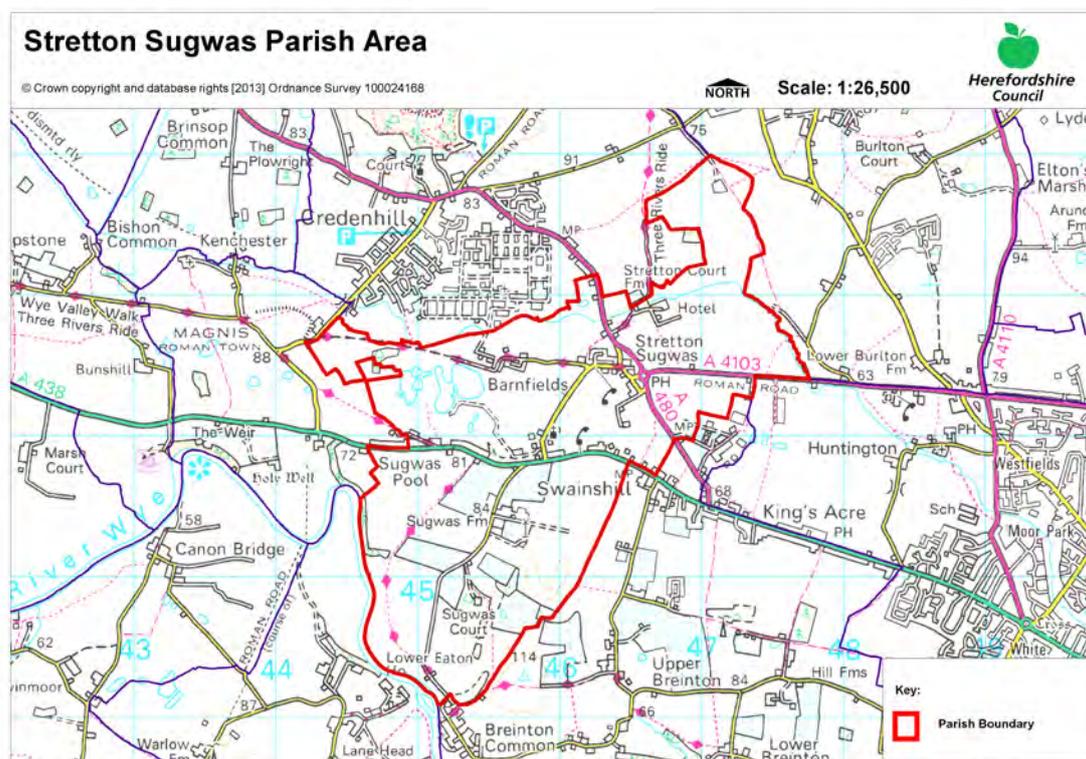
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1 Introduction

- 1.1 This Screening Assessment relates to a Neighbourhood Development Plan that is considered to be in general conformity with higher level strategic plans, such as the Herefordshire Core Strategy and the National Planning Policy Framework. The screening stage involves assessing broadly whether the final Neighbourhood Plan is likely to have a significant effect on any European site(s).
- 1.2 Stretton Sugwas Group Parish Council has produced a Neighbourhood Development Plan for Stretton Sugwas Parish, in order to set out the vision, objectives and policies for the development of the Parish up to 2031. This HRA reviews the regulation 14 draft Stretton Sugwas Plan (June 2018). Stretton Sugwas previously carried out a Regulation 14 plan in 2015. Since then the plan has significantly changed, therefore all of the options, objectives and policies have been rescreened and assessed in this report. The previous Reg 14 assessments can be found on the Herefordshire Council website.
- 1.3 The NDP contains criteria based policies and designates a settlement boundary within the settlement of Stretton Sugwas. 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 Stretton Sugwas Neighbourhood Area to which this assessment related.



2 The requirement to undertake Habitats Regulations Assessment of neighbourhood plans

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- 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, Stretton Sugwas 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 River Wye SAC, reviewed in terms of the implications of *Sweetman*.

3 Methodology

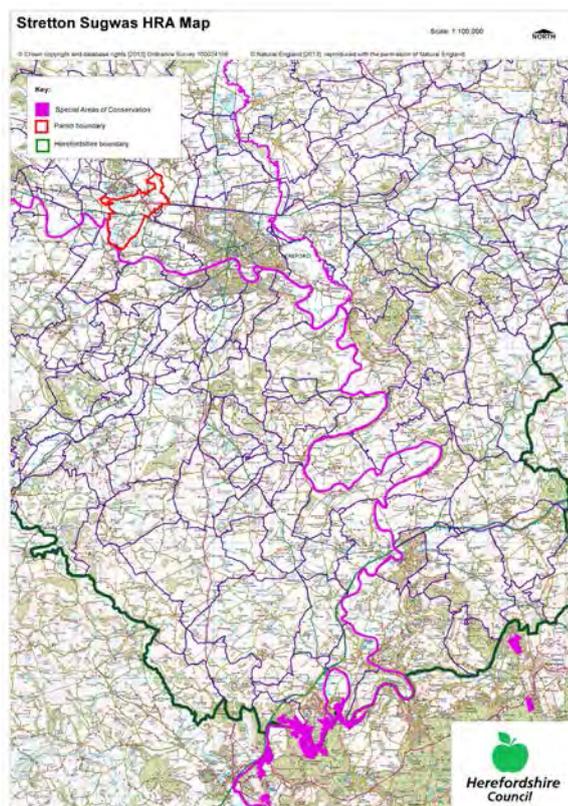
- 3.1 Although the Stretton Sugwas NDP is not in direct management of any European sites, it does include proposals for development which may affect European sites. Therefore, it is necessary under Regulation 102(1)(a) of the Habitats Regulations 2010 to undertake screening for likely significant effects 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 (October 2013) found that the River Wye (including the River Lugg) SAC borders the southern edge of the parish and the parish falls within the hydrological catchment of the River Wye.. Figure 2 below highlights the location of River Wye SAC.



- 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. There are two treatment works that cover the Hereford Area Eign and Rotherwas. DCWW states there is available headroom at the Eign waste water treatment works within the neighbourhood area. New development will need to adhere to the provisions of Policy SD4 of the Core Strategy. In Water Cycle Study addendum it states that in the Eign STW there is enough capacity for up to 1173 dwellings in the Hereford Area. 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 Stretton Sugwas 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 Stretton Sugwas 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 Stretton Sugwas NDP.
- 4.10 The initial options for the NDP were assessed to determine their environmental impact that could affect the River Wye SAC. Overall the majority of the options proposing any growth appear to depend on location and scale in relation to environmental impact.
- 4.11 As the Stretton Sugwas Plan progresses from options onto their NDP policies, the Plan will need to identify ways in which the Stretton Sugwas NDP effect on the River Wye 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 Stretton Sugwas Neighbourhood Development Plan

- 5.1 The draft Stretton Sugwas 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. This vision statement can be found on p19 of the NDP. The vision strives to improve the sense of community and environment by sustainable development and maintenance of built and natural infrastructure whilst maintaining a separate sense identity of Stretton Sugwas. There are six objectives of how this will be achieved. The objectives cover then following topics:

- Protect rural character and landscape
- Protect rural identity and communities.
- Promote high quality design
- Sustainably develop housing and employment
- Support appropriate development
- Support community facilities

5.3 The initial options for the NDP (refer to appendix 2) were assessed to determine their environmental impact that could affect the River Wye SAC. 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 Do nothing. |
| Option 2 Allocate sites for housing. |
| Option 3 Manage future housing using a settlement boundary. |
| Option 4 Allocate sites and identify a settlement boundary. |
| Option 5 (Preferred Option) Manage future housing through a development management policy. |

5.4 As Stretton Sugwas Neighbourhood Plan progressed from options to draft NDP policies, the Plan needed to identify ways in which the Stretton Sugwas effect on the River Wye 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 June 2018, these can be found in the Regulation 14 HRA report.

6.0 Assessments undertaken to date of the emerging Stretton Sugwas 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 Stretton Sugwas NDP would be likely to have a significant effect on the River Wye SAC. This will be repeated at each statutory stage of the NDP consultation process.

6.2 The NDP also sets out 8 policies on various topics based on the objective headings above and also for the village, these include:

- Policy SS1 Protecting Sensitive Landscapes

- Policy SS2 Landscape Design Principles
- Policy SS3 Managing Flood Risk
- Policy SS4 Building Design Principles and Protecting Heritage
- Policy SS5 Managing New Business Development in Former Agricultural Buildings
- Policy SS6 Settlement Boundaries
- Policy SS7 Criteria for New Housing Sites, and
- Policy SS8 Housing in the Countryside

The NDP does not allocate sites for housing. Two settlement boundaries in Stretton Sugwas and Sugwas Pool have been allocated in order to facilitate the proportional growth envisaged by Policy RA2 of the Local Plan (Core Strategy).

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 Stretton Sugwas NDP objectives and policies (June 2018) were concluded to be likely to have a significant effect on the European sites. The parish itself has the River Wye SAC bordering the southern edge of the parish, however. The settlement of Stretton Sugwas and settlement boundary is not in close proximity to the river and unlikely to have a direct significant impact on the SAC. Core Strategy policy SD3 and SD4 together with the Nutrient Management Plan will ensure that development can only occur if these policy requirements are met.
- 6.5 In many cases this is because the policies themselves would not result in development, i.e. they related instead to criteria for development and the SAC itself is not within the parish. In several cases the policies also included measures to help support the natural environment including biodiversity.
- 6.6 It is unlikely that the Stretton Sugwas 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 Hereford Market Area in the Herefordshire Core Strategy.
- 6.7 Therefore it was concluded that the **Reg14 Stretton Sugwas NDP would not have a likely significant effect on the River Wye (including the River Lugg) SAC.**

Screening of modifications to NDP (Reg16)

- 6.8 The submission draft NDP rescreens all of the policies post reg 14 amendments. The changes were in light of comments received at regulation 14 consultation and to ensure that the plan meets the Basic Conditions. Policies SS1 and SS6 (now SS7) have been amended and rescreened, overall the rescreening did not significantly affect the conclusions of the earlier HRA report, as they did not involve the introduction of new policies or change the overall aims and objectives of the existing planning policies, despite the addition of new criteria in certain places. In general, these refinements relate to the composition of certain sentences and phrases, minor points of accuracy in relation to technical information and references to evidence base studies and other documentation. Policy SS3 Green Infrastructure has been deleted following comments received at regulation 14.
- 6.9 The reg 16 submission NDP policies are therefore unlikely to result in significant effects on the European sites the River Wye (including the River Lugg) SAC.

7 Assessment of the 'likely significant effects' of the submission Stretton Sugwas NDP and implications of *Sweetman* case following examination

- 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 SS9 has been deleted as it was not considered a land use policy and is considered to be more of a community aspiration. 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 SS1,SS6 and SS7. These have been rescreened and results have found that none of these require an appropriate assessment.
- 7.3 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.
- 7.4 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 |

- 7.5 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 at this 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 submission Stretton Sugwas Neighbourhood Plan (November 2019) policies were concluded to be likely to have a significant effect on the River Wye SAC
- 8.2 This is partly down to scale and extent of plan also the Stretton Sugwas Plan, and there are no 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 2018 are currently 30 dwellings, nearly meeting the indicative target of 31 dwellings. The plan allocates settlement boundaries for development within Stretton Sugwas. No sites have been allocated; the housing target is expected to be met through windfall and infills.
- 8.4 The location of the settlement boundary, 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 sufficient capacity at Eign waste water treatment works to accommodate growth within the neighbourhood area. 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 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 Stretton Sugwas Neighbourhood Plan will not have a likely significant effect on the River Wye SAC.***

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

- 9.1 There are a number of potentially relevant plans and projects which may result in in-combination effects with the Core Strategy across Herefordshire, these plans have been reviewed and can be found in Appendix 2 of the publication of the Herefordshire Local Plan Core Strategy Habitats Regulations Assessment (Oct 2015).
- 9.2 It is seen that as this NDP does not go over and beyond the requirements set out in the Core Strategy.
- 9.3 Neighbouring neighbourhood plans include Burghill, Eaton Bishop and Breinton have been made. Credenhill and Bishopstone are currently in the process of producing a neighbourhood plan. Stretton Sugwas is also adjacent to Hereford City, they are currently producing a Area Plan. These plans have not gone over and beyond the requirements set out within the Core Strategy for their area.
- 9.4 The HRA for the Core Strategy also identifies that both the Water Cycle Study for Herefordshire, which indicates the potential for planned water abstraction requirements combined with pressures on European Sites from the Core Strategy policies, and the work on the Nutrient Management Plan, to ensure the favourable conservation status of the SAC in respect of phosphate levels as soon as possible and at the latest by 2027, have both been considered as part of the in-combination assessment.
- 9.5 It is unlikely that the Stretton Sugwas 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 Hereford Housing Market Area in the Herefordshire Core Strategy.

10.0 Conclusion

- 10.1 With reference to sections 6 to 9 above, the final 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 **Stretton Sugwas NDP will not have a likely significant effect on the River Wye SAC.**

11.0 Next steps

- 11.1 This submission Report will be published alongside the final Stretton Sugwas NDP and the earlier HRA Report and its addendum. This will be subject to a undergo a Referendum in January 2020.

Appendix 1

Initial Habitat Regulations Assessment and Strategic Environmental Assessment Screening Notification

The Neighbourhood Planning (General) Regulation 2012 (Reg. 32)

Conservation of Habitats and Species Regulations 2010 (d)

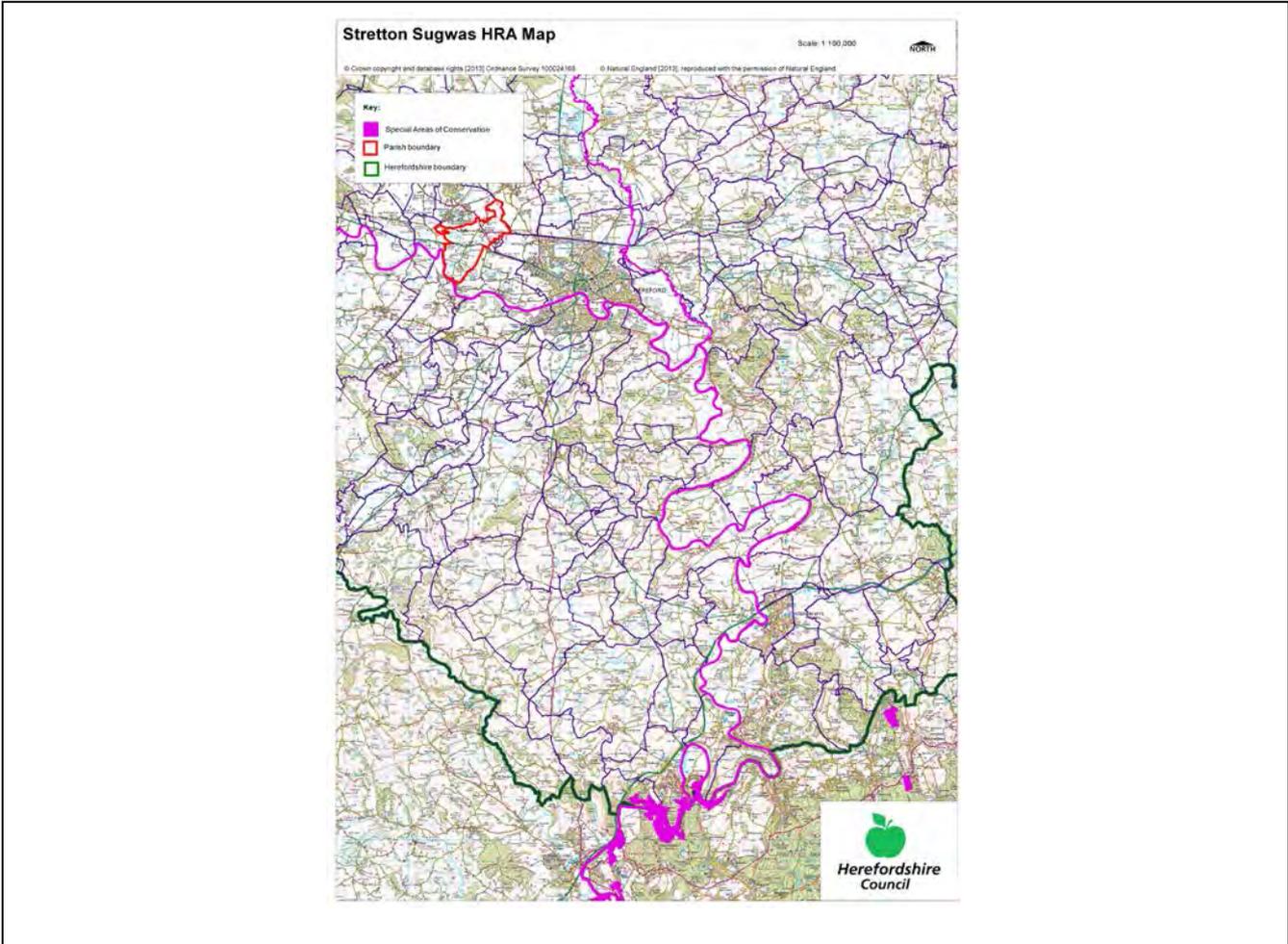
| | |
|---|------------------------------------|
| Neighbourhood Area: | Stretton Sugwas Neighbourhood Area |
| Parish Council: | Stretton Sugwas Parish Council |
| Neighbourhood Area Designation Date: | 25/11/13 |

Introduction

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

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

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



Initial HRA Screening

River Wye (including the River Lugg) SAC:

| | | |
|--|---|--|
| Does the Neighbourhood Area have the River Wye (including the River Lugg) in or next to its boundary? | Y | The River Wye SAC borders the Parish in the south |
| Is the Neighbourhood Area in the hydrological catchment of the River Wye (including the River Lugg) SAC? | Y | The Parish is within the hydrological catchment of the River Wye |
| If yes above, does the Neighbourhood Area have mains drainage to deal with foul sewage? | Y | There is mains drainage in Hereford |

Downton Gorge SAC:

| | | |
|---|---|--|
| Is the Neighbourhood Area within 10km of Downton Gorge SAC? | N | Downton Gorge is 29.2km away from the Parish |
|---|---|--|

River Clun SAC:

| | | |
|--|---|---------------------------------------|
| Does the Neighbourhood Area include: Border Group Parish Council or Leintwardine Group Parish Council? | N | River Clun does not border the Parish |
|--|---|---------------------------------------|

Usk Bat Sites SAC:

| | | |
|--|---|---|
| Is the Neighbourhood Area within 10km of the SAC boundary? | N | Usk Bat Sites are 34.5km away from the Parish |
|--|---|---|

Wye Valley & Forest of Dean Bat Sites SAC:

| | | |
|--|---|--|
| Is the Neighbourhood Area within 10km of any of the individual sites that make up the Wye Valley & Forest of Dean Bat Sites? | N | The Parish is 28.2km away from Wye Valley and Forest of Dean Bat Sites |
|--|---|--|

Wye Valley Woodlands SAC:

| | | |
|--|---|---|
| Is the Neighbourhood Area within 10km of any of the individual sites that make up the Wye Valley Woodlands Site? | N | The Parish is 27.6km away from the Wye Valley Woodlands |
|--|---|---|

HRA Conclusion:

The assessment above highlights that the following European Sites will need to be taken into account in the future Neighbourhood Development Plan for the Stretton Sugwas Neighbourhood Area and a Full HRA Screening will be required.

European Site

(List only those which are relevant from above)

River Wye (including the River Lugg) SAC

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

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

| SEA features | Total | Explanation | SEA required |
|---|--------------------|---|--------------|
| Air Quality Management Areas | 0 | There are no AQMAs within the Parish | N |
| Ancient Woodland | 2 | Credenhill Park Wood (border); 1 x unlabelled piece of land along A438 | Y |
| Areas of Archaeological Interest | 0 | There are no AAls within the Parish | N |
| Areas of Outstanding Natural Beauty | 0 | There are no AONBs within the Parish | N |
| Conservation Areas | 2 | Huntington (border); Burghill (border) | Y |
| European Sites | 1 | River Wye | Y |
| Flood Areas | | Flood Zones 2 and 3 flow through the north and south of the Parish | Y |
| Listed Buildings | Numerous | There are numerous Listed Buildings throughout the parish | Y |
| Local Sites (SWS/SINCs/RIGS) | 2 (SINCs) 11 (SWS) | SINC: Yazor Brook (border); Railway Line near Green Farm (border) SWS: Two pools at Stretton Sugwas Gravel Workings; Pond near Stretton House; River Wye; Pool near Magna Castra House (border); First pond near Bunshill (border); Credenhill Park Woods and Sally Coppice (border); Pond at Huntington Court (border); Kings Acre Reserve (border); Field near Eaton camp (border); Warlow Pool (border); Pond near Longmoor Cottage (border) | Y |
| Long distance footpaths/trails | 2 | Three Rivers Ride; Wye Valley Walk | Y |
| Mineral Reserves | 7 | South of Roman Road to A438 and area between Wye and A438; North west of Credenhill (border); Kings Acre, Linden House (border); South of Canon Bridge (border); Kings Acre, Caravan Park (border); Cot Barn (border); West and south of Portway, east of Burghill down Canon Pyon Road (border) | Y |
| National Nature Reserve | 0 | There are no NNRs within the Parish | N |
| Registered & Unregistered parks and gardens | 9 Unregistered | Sugwas Court; Burghill Court; Lower Eaton (border); New Weir (border); Canon Bridge House (border); Burghill Hospital (border); Huntington Court, Hereford (border); Wyeclyffe Court (border); Credenhill Court (border) | Y |
| Scheduled Ancient Monuments | 6 | Medieval Bridge 870m north east of Stretton Court Farm; Churchyard cross at St Mary the Virgins Churchyard (border); Site of Romano-British town of | Y |

| | | | |
|--------------------------------------|---|---|---|
| | | Magna (border); New Weir Roman Site (border); Credenhill Camp (border); Eaton camp (border) | |
| Sites of Special Scientific Interest | 1 | River Wye (Unfavourable Recovering); | Y |

Decision Notification:

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

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

Assessment date: 21/10/2013

Assessed by: James Latham

Appendix 1: European Sites

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

| |
|---|
| Downton Gorge |
| Site Features: <i>Tilio-Acerion</i> forests of slopes, screes and ravines |
| Vulnerability data: 10km for air quality associated with poultry units or other intensive agricultural practices. |
| River Clun |
| Site Features: Freshwater pearl mussel <i>Margaritifera margaritifera</i> |
| Vulnerability data: Water quality is important to maintain the site feature. Parishes either side of the River Clun will be affected. |
| River Wye |
| Site Features: Water courses of plain to montane levels with the <i>Ranunculion fluitantis</i> and <i>Callitricho-Batrachion</i> vegetation. Transition mires and quaking bogs. White-clawed (or Atlantic Stream) crayfish <i>Austropotamobius pallipes</i> . Sea lamprey <i>Petromyzon marinus</i> . Brook lamprey <i>Lampetra planeri</i> . River lamprey <i>Lampetra fluviatilis</i> . Twaite shad <i>Alosa fallax</i> . Atlantic salmon <i>Salmo salar</i> . Bullhead <i>Cottus gobio</i> . Otter <i>Lutra lutra</i> . Allis shad <i>Alosa alosa</i> |
| Vulnerability data: Proximity: Developments should not be within 100m of the designated bank. Some developments beyond 100m may also have impacts based on proximity and these issues should be addressed where possible when developing NDP policy and choosing site allocations. Water Quality: Within the whole catchment of the River Wye, which includes the River Lugg, mains drainage issues with regards to water quality are being resolved through the Core Strategy / Local Plan and development of a Nutrient Management Plan. Welsh Water should be consulted to ensure that the proposed growth will be within the limit of their consents. Otters: "An otter will occupy a 'home range', which on fresh waters usually includes a stretch of river as well as associated tributary streams, ditches, ponds, lakes and woodland. The size of a home range depends largely on the availability of food and shelter, and the presence of neighbouring otters. On rivers, a male's home range may be up to 40km or more of watercourse and associated areas; females have smaller ranges (roughly half the size) and favour quieter locations for breeding, such as tributary streams. Otters without an established home range are known as 'transients'. They are mostly juveniles looking for a territory of their own, or adults that have been pushed out of their territories. Transient otters may use an area for a short while, but they will move on if conditions are not suitable or if they are driven away by resident otters. Transients will have been important in extending the range of otters, but they are very difficult to identify from field signs. Within a home range an otter may use many resting sites. These include above-ground shelters, such as stands of scrub or areas of rank grass, and underground 'holts' – for example, cavities under tree roots and dry drainage pipes." (Source: EA website: http://www.environmentagency.gov.uk/static/documents/Business/Otters_the_facts.pdf accessed 09/04/2013) |

Usk Bat Site

Site Features: Annex I habitats present as a qualifying feature, but not a primary reason for site selection: European dry heaths, Degraded raised bogs still capable of natural regeneration, Blanket bogs, Calcareous rocky slopes with chasmophytic vegetation, Caves not open to the public, *Tilio-Acerion* forests of slopes, screes and ravines. Annex II species of primary reason for site selection: Lesser horseshoe bat *Rhinolophus hipposideros*, UK population 5%, although it is suggested this is an underestimate.

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

Wye Valley and Forest of Dean Bat Sites

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

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

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

NDPs closest to the European Site will need to consider:

Woodland habitat buffer.

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

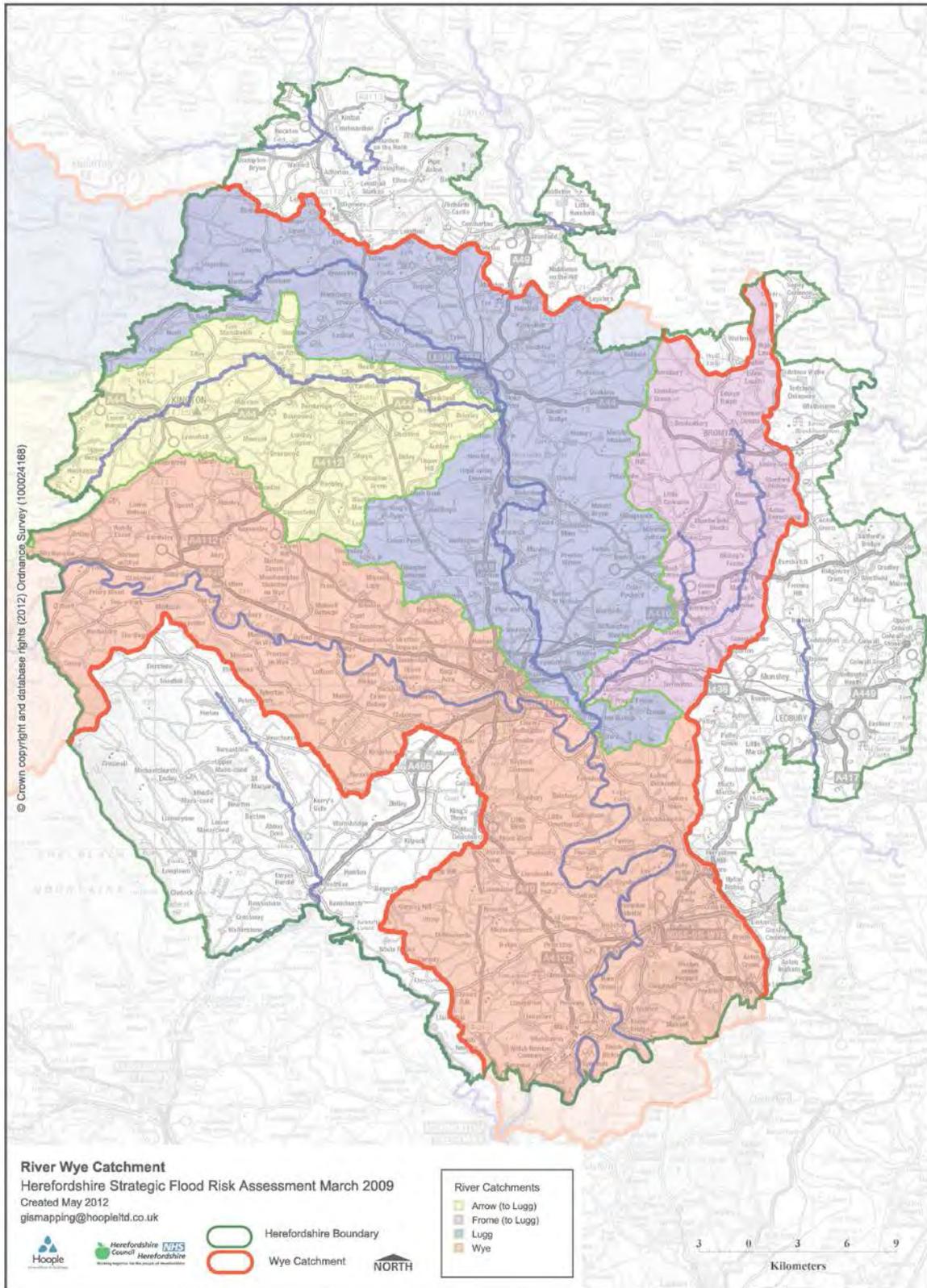
Greater Horseshoe Bat: Large buildings, pasture, edge of mixed deciduous woodland and hedgerows. Mixed land-use especially south-facing slopes, favours beetles, moths and insects they feed on. During the winter they depend on caves, abandoned mines and other underground sites for undisturbed hibernation.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

Wye Valley Woodlands

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

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

Appendix 2: Wye Catchment Map



Appendix 2

Stretton Sugwas Options

| |
|---|
| Option 1 Do nothing |
| Option 2 Allocate sites for housing |
| Option 3 Manage future housing using a settlement boundary |
| Option 4 Allocate sites and identify a settlement boundary. |
| Option 5 Manage future housing through a development management policy. |
| Stretton Sugwas SB Option 1 |
| Stretton Sugwas SB Option 2-Selected |
| Sugwas Pool SB Option 1 |
| Sugwas Pool SB Option 2-Selected |

Appendix 3

HRA Screening of Objectives, Options and Policies prior to Draft Plan (reg 14) Consultation

Parish Council Name: Stretton Sugwas

NDP Title: Stretton Sugwas Neighbourhood Plan

Date undertaken: November 2018

| NDP objectives | HRA Screening of NDP objectives and policies | | | | |
|---|--|---|--|---|---|
| | Likely activities (operations) to result as a consequence of the objective/policy | Likely effect if objective/policy implemented. Could they have Likely Significant Effects on European Sites? (Yes/No, with reasons) | European Sites potentially affected | Mitigation measures to be considered, as necessary, through redraft of objective/option/policy. | Could the policy have any likely significant effects on European sites (taking mitigation into account)? |
| Option 1 Do nothing. | Relies on strategic policies within the core strategy to determine housing growth. | Criteria policies within the Core Strategy would guide further development. Specific policies and proposals for the parish would not exist. | N/A | N/A | N/A |
| Option 2 Allocate sites for housing. | Small scale proportionate growth on specific sites identified on a proposals map. | Greater degree of certainty over the impact of future development on the River Wye SAC, as the location of housing would be pre-determined and not left to market forces. | River Wye (including the River Lugg) SAC | Specific environmental issues could be investigated during the site search and be positively addressed within the policy wording. Policy would need to take account of the proportional growth requirements of the Core Strategy and potential headroom capacity at the local STW. | No, development in line with the Local Plan (Core Strategy) and the policy safeguards which exist within the Core Strategy should avoid or mitigate any likely significant effects. Policy criteria should be included within the NDP which reflects this. Further assessments will be undertaken at draft policy stage. |

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| NDP objectives | HRA Screening of NDP objectives and policies | | | | |
|--|--|--|--|--|---|
| | Likely activities (operations) to result as a consequence of the objective/policy | Likely effect if objective/policy implemented. Could they have Likely Significant Effects on European Sites? (Yes/No, with reasons) | European Sites potentially affected | Mitigation measures to be considered, as necessary, through redraft of objective/option/policy. | Could the policy have any likely significant effects on European sites (taking mitigation into account)? |
| Option 3 Manage future housing using a settlement boundary. | Small scale proportionate growth within a defined settlement boundary area. The designation of a settlement boundary will give additional certainty and help define those areas considered as the built form and open countryside. | Uncertain as to the impact on the River Wye SAC as dependant on the location of the development. The River Wye flows immediately west of Stretton Sugwas Common. | River Wye (including the River Lugg) SAC | Additional criteria would be required when formulating the accompanying settlement boundary policy to ensure that no likely significant effects could occur. Policy would need to take account of the proportional growth requirements of the Core Strategy and potential headroom capacity at the local STW. | No, development in line with the Local Plan (Core Strategy) and the policy safeguards which exist within the Core Strategy should avoid or mitigate any likely significant effects. Policy criteria should be included within the NDP which reflects this. Further assessments will be undertaken at draft policy stage. |

| NDP objectives | HRA Screening of NDP objectives and policies | | | | |
|--|---|--|--|---|---|
| | Likely activities (operations) to result as a consequence of the objective/policy | Likely effect if objective/policy implemented. Could they have Likely Significant Effects on European Sites? (Yes/No, with reasons) | European Sites potentially affected | Mitigation measures to be considered, as necessary, through redraft of objective/option/policy. | Could the policy have any likely significant effects on European sites (taking mitigation into account)? |
| Option 4 Allocate sites and identify a settlement boundary. | Small scale proportionate growth on specific sites identified on a proposals map and within a defined settlement boundary area. | Greater degree of certainty over the impact of future development on the River Wye SAC, as the location of housing would be pre-determined and the settlement boundary would provide a clear distinction between open countryside and the built environment. | River Wye (including the River Lugg) SAC | Specific environmental issues could be investigated during the site search and be positively addressed within the policy wording. Additional criteria would be required when formulating the accompanying settlement boundary policy to ensure that no likely significant effects could occur. Policy would need to take account of the proportional growth requirements of the Core Strategy and potential headroom capacity at the local STW. | No, development in line with the Local Plan (Core Strategy) and the policy safeguards which exist within the Core Strategy should avoid or mitigate any likely significant effects. Policy criteria should be included within the NDP which reflects this. Further assessments will be undertaken at draft policy stage. |
| Option 5 (Preferred Option) Manage future housing through a | Small scale proportionate growth where the location would be determined by a criteria based policy. | Uncertain as to the impact on the River Wye SAC as dependant on the location of the development. The River Wye flows immediately west of Stretton Sugwas Common. | River Wye (including the River Lugg) SAC | Criteria based housing policy would require to include reference to mitigation measures to avoid any non-disturbance effects on the River Wye via its catchment. Policy would need to take | No, development in line with the Local Plan (Core Strategy) and the policy safeguards which exist within the Core Strategy should avoid or mitigate any likely significant effects. Policy criteria should be included within the NDP which reflects this. |

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| NDP objectives | HRA Screening of NDP objectives and policies | | | | |
|--------------------------------|---|--|-------------------------------------|--|--|
| | Likely activities (operations) to result as a consequence of the objective/policy | Likely effect if objective/policy implemented. Could they have Likely Significant Effects on European Sites? (Yes/No, with reasons) | European Sites potentially affected | Mitigation measures to be considered, as necessary, through redraft of objective/option/policy. | Could the policy have any likely significant effects on European sites (taking mitigation into account)? |
| development management policy. | | | | account of the proportional growth requirements of the Core Strategy and potential headroom capacity at the local STW. | Further assessments will be undertaken at draft policy stage. |

| 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 |
| Objective 1 | This objective strives to safeguard the rural landscape setting of the parish. | None identified. | River Wye (including the Lugg SAC). The River Wye borders the Parish in the south. | None identified | Not required. This objective will not result in development, instead it strives to safeguard the rural landscape of the parish and therefore unlikely to have a significant impact on the SAC. |

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| | | | | | |
|--------------------|--|------------------|--|-----------------|--|
| Objective 2 | This objective strives to protect the local identity and character of existing communities in the parish. | None identified. | River Wye (including the Lugg SAC). The River Wye borders the Parish in the south. | None identified | Not required. This objective will not result in development, instead it strives to safeguard the rural character of the parish and therefore unlikely to have a significant impact on the SAC. |
| Objective 3 | Promote high quality design for new development to ensure new development is in keeping with the existing context. | None identified. | River Wye (including the Lugg SAC). The River Wye borders the Parish in the south. | None identified | Not required. This objective will not directly result in development, instead it provides design criteria for development to adhere to and therefore unlikely to have a significant impact on the SAC. |
| Objective 4 | This objective supports a sustainable level of housing and employment within the plan period. | None identified. | River Wye (including the Lugg SAC). The River Wye borders the Parish in the south. | None identified | Not required. This objective will not directly lead to development instead it provides criteria to support sustainable development for housing and employment in the parish. |
| Objective 5 | This objective supports appropriate development for change of uses of agricultural buildings to business uses, ensuring they are sensitive and complementary to the rural character of the parish. | None identified. | River Wye (including the Lugg SAC). The River Wye borders the Parish in the south. | None identified | Not required. This objective will not result in development, instead it provides criteria for development to adhere to and therefore unlikely to have a significant impact on the SAC. |

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| | | | | | |
| Objective 6 | This objective supports realistic and deliverable framework for developer contributions to provide improvements to local infrastructure. | None identified. | River Wye (including the Lugg SAC). The River Wye borders the Parish in the south. | None identified | Not required. This objective will not result in development, instead it provides criteria for development to adhere to. |
| Policies | | | | | |
| Policy SS1 Protecting Sensitive Landscapes | Safeguard existing built and natural landscape against inappropriate development. Protects natural habitats for local wildlife. Sensitive and appropriate designed development. | Unlikely that there will be any significant effects on the European Site. | River Wye (including the Lugg SAC). The River Wye borders the Parish in the south. | None identified | 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 SS2 Landscape Design Principles | Safeguard existing landscape against inappropriate development Mature trees protected. Encouragement of sustainable development which preserves and protects the landscape, environment and natural habitats. Encourage sustainable modes of transport. Footpaths protected. | Unlikely that there will be any significant effects on the European Site. | River Wye (including the Lugg SAC). The River Wye borders the Parish in the south. | None identified | 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. |

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| | | | | | |
|---|--|--|---|------------------------|---|
| <p>Policy SS3 Green Infrastructure</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>Habitats preserved and enhanced.</p> <p>Ecological network enhanced and strengthened.</p> | <p>Unlikely that there will be any significant effects on the European Site.</p> | <p>River Wye (including the Lugg SAC). The River Wye borders the Parish in the south.</p> | <p>None identified</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.</p> <p>Implementation of Core Strategy policy SD4, LD2, SD1 to grant planning permission will ensure water quality issues are addressed.</p> |
| <p>Policy SS4 Managing Flood Risk</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 Wye borders the Parish in the south.</p> | <p>None identified</p> | <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 SS5 Building Design Principles and Protecting Heritage</p> | <p>Protection and enhancement of heritage assets within Stretton Sugwas.</p> <p>Sensitive housing development nearby heritage assets.</p> <p>Appropriate palette of materials used.</p> <p>Sustainable housing design</p> | <p>Unlikely that there will be any significant effects on the European Site.</p> | <p>River Wye (including the Lugg SAC). The River Wye borders the Parish in the south.</p> | <p>None identified</p> | <p>Not required. This policy strives sets out design criteria for new development to adhere to, to protect and enhance the historic environment, this could potentially have a positive impact on the SAC sites.</p> <p>Implementation of Core Strategy policy SD4, LD2, SD1 to grant planning permission will ensure water quality issues are addressed.</p> |

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| | | | | | |
|---|--|--|---|------------------------|--|
| | <p>promoted.</p> <p>Lists design criteria for development to adhere to.</p> | | | | |
| <p>Policy SS6 Managing New Business Development in Former Agricultural Buildings</p> | <p>Policy provides criteria for business development in former agricultural buildings.</p> <p>Small scale business growth.</p> <p>Small increase in traffic.</p> | <p>Unlikely that there will be any significant effects on the European Site. All developments are required to meet the criteria of Policy LD2 to protect biodiversity and wildlife, and SD4 which seeks to ensure water quality of the SAC is not detrimentally effected</p> | <p>River Wye (including the Lugg SAC). The River Wye borders the Parish in the south.</p> | <p>None identified</p> | <p>Not required. This policy provides criteria for managing new business development in former agricultural buildings. Implementation of Core Strategy policy SD4, LD2, SD1 to grant planning permission will ensure water quality issues are addressed.</p> |
| <p>Policy SS7 Settlement Boundaries</p> | <p>Settlement boundary defined to define where the settlement of Stretton Sugwas is.</p> <p>Infill development within the settlement boundary.</p> <p>Small scale development supported.</p> <p>Re development and re use of existing brownfield</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 Wye borders the Parish in the south.</p> | <p>None identified</p> | <p>Not required. The scale and extent 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.</p> |
| <p>Policy SS8 Criteria for New Housing Sites</p> | <p>New housing developed</p> <p>Increase in vehicle traffic.</p> <p>Increased demand for water abstraction and sewage treatment.</p> <p>Increase 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</p> | <p>River Wye (including the Lugg SAC). The River Wye borders the Parish in the south.</p> | <p>None identified</p> | <p>Not required. This policy provides criteria for new housing development within the identified settlement boundary. 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</p> |

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| | | | | | |
|--|---|---|--|-----------------|--|
| | Increase in nonphysical disturbance. | detrimentally effected | | | water quality issues are addressed. |
| Policy SS9 Housing in the Countryside | <p>Small scale housing developed</p> <p>Increase in vehicle traffic.</p> <p>Increased demand for water abstraction and sewage treatment.</p> <p>Increase in vehicular usage.</p> <p>Nonphysical disturbance.</p> <p>Mix of housing types developed.</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 | River Wye (including the Lugg SAC). The River Wye borders the Parish in the south. | None identified | 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. |
| Policy SS10 New Roads | <p>This policy provides criteria to reduce adverse affects from the Hereford Bypass.</p> <p>Within this policy there is safeguarding for local wildlife.</p> <p>Traffic calming measures are supported.</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 | River Wye (including the Lugg SAC). The River Wye borders the Parish in the south. | None identified | Not required. This policy provides criteria to ensure impact from the Hereford Bypass is minimised and reduce adverse impacts on landscape character and wildlife. Implementation of Core Strategy policy SD4 to grant planning permission will ensure water quality issues are addressed. |

Appendix 4

HRA Consultation Feedback

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

Parish Council Name: Stretton Sugwas Parish Council

Neighbourhood Development Plan Name: Stretton Sugwas Neighbourhood Plan

Details of consultation: Regulation 14

Consultation date: 10 December 2018 to 4 February 2019

Consultation title: Regulation 14

No comments have been received in regards to the HRA assessments.

Appendix 5

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

Parish Council Name: Stretton Sugwas Parish Council

NDP Title: Stretton Sugwas Neighbourhood Plan

Date undertaken: April 2019

| NDP objectives, options and policies significantly changed following Draft Plan Consultation | HRA Screening of significant changes (objectives, options and policies) following Draft Plan Consultation | | | | |
|--|--|--|--|---|---|
| | Likely activities (operations) to result as a consequence of the objective/option/policy | Likely effect if option implemented. Could they have Likely Significant Effects (LSE) on European Sites? | European Sites potentially affected | Would it be possible that it would result in any LSE? | Requirement for an Appropriate Assessment |
| Policy SS1- Protecting sensitive landscapes. | <p>Safeguard existing built and natural landscape against inappropriate development.</p> <p>Protects natural habitats for local wildlife.</p> <p>Sensitive and appropriate designed development.</p> | Unlikely that there will be any significant effects on the European Site. | River Wye (including the Lugg SAC). The River Wye borders the Parish in the south. | None identified | <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>Changes to this policy provide further clarity and flexibility by encouraging schemes now up to 12 units instead of 5. This does not change the previous conclusion that no appropriate assessment is required.</p> |

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| | | | | | |
|--|--|--|---|------------------------|--|
| <p>Policy SS6 Settlement boundaries (previously SS7)</p> | <p>Settlement boundary defined to define where the settlement of Stretton Sugwas is.</p> <p>Infill development within the settlement boundary.</p> <p>Small scale development supported.</p> <p>Re development and re use of existing brownfield</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 Wye borders the Parish in the south.</p> | <p>None identified</p> | <p>Not required. The scale and extent 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.</p> <p>Changes to this policy provide further clarity and is more compliant with the Core Strategy.</p> <p>There are no changes the policies impact on the SAC.</p> |
|--|--|--|---|------------------------|--|

Appendix 6

HRA Consultation Feedback

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

Parish Council Name: Stretton Sugwas Parish Council

Neighbourhood Development Plan Name: Stretton Sugwas Neighbourhood Plan

Details of consultation: Regulation 16

Consultation date: 8 May to 19 June 2019

Consultation title: Regulation 16

No comments have been received in regards to the HRA assessments.

Appendix 7

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

Parish Council Name: Stretton Sugwas Parish Council

NDP Title: Stretton Sugwas Neighbourhood Plan

Date undertaken: November 2019

| NDP objectives, options and policies significantly changed following Draft Plan Consultation | HRA Screening of significant changes (objectives, options and policies) following Draft Plan Consultation | | | | |
|--|--|--|---|---|--|
| | Likely activities (operations) to result as a consequence of the objective/option/policy | Likely effect if option implemented. Could they have Likely Significant Effects (LSE) on European Sites? | European Sites potentially affected | Would it be possible that it would result in any LSE? | Requirement for an Appropriate Assessment |
| Policy SS1- Protecting sensitive landscapes. | <p>Safeguard existing built and natural landscape against inappropriate development.</p> <p>Protects natural habitats for local wildlife.</p> <p>Sensitive and appropriate designed development.</p> | <p>Unlikely that there will be any significant effects on the European Site.</p> | <p>River Wye (including the Lugg SAC). The River Wye borders the Parish in the south.</p> | <p>None identified</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>Changes to this policy post examination removes part of the policy to help clarify the policy removing ambiguous parts. This does not change the previous conclusion that no appropriate assessment is required.</p> |

| | | | | | |
|--|--|--|---|------------------------|--|
| <p>Policy SS6 Settlement boundaries</p> | <p>Settlement boundary defined to define where the settlement of Stretton Sugwas is.</p> <p>Infill development within the settlement boundary.</p> <p>Small scale development supported.</p> <p>Re development and re use of existing brownfield</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 Wye borders the Parish in the south.</p> | <p>None identified</p> | <p>Not required. The scale and extent 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.</p> <p>Changes to this policy post examination provide further clarity and merge part of policies that previously overlapped, and is more compliant with the Core Strategy. No changes the policies affect the SAC.</p> |
| <p>Policy SS7 Criteria for New Housing Sites</p> | <p>Criteria set out for new development to adhere to.</p> <p>New housing developed</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>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 Wye borders the Parish in the south.</p> | <p>None identified</p> | <p>Not required. This policy provides criteria for new housing development within the identified settlement boundary. The scale and extent of potential housing development is unlikely to have a significant impact on the SAC. Implementation of Core Strategy policy SD4, LD2, SD1 to grant planning permission will ensure water quality issues are addressed.</p> <p>Changes to this policy post examination provides further clarity, is more flexible and is more compliant with the Core Strategy.</p> <p>There are no changes the policies impact on the SAC.</p> |

Appendix 8

| Policy | Modification recommended | Justification |
|----------------------------|---|--|
| Recommended Modification 1 | Modify the settlement boundary for Stretton Sugwas as shown on Map 5 on page 23 of the plan to exclude land to the east of the A480 bypass from the settlement. Redraw the boundary north of the Travellers Inn to follow the western side of the A480. | In accordance with policy RA2. |
| Recommended Modification 2 | Delete Policy SS9 as a statutory policy and move it, along with the accompanying text, to the section 6.5 of the plan as a community aspiration dealing with those measures considered necessary to minimise any environmental impact on the parish. | For clarity and accordance with national planning policy guidance. Removal of aspirational non-land use parts of the policy. |
| Recommended Modification 3 | In the second paragraph of Policy SS1, delete the first part of the second sentence from 'Developments should ...' to, and including, the words '...wherever possible and' starting the sentence with 'New buildings should ...' | For clarity and accuracy. Removal of ambiguity. In accordance with national planning policy guidance. |
| Recommended Modification 4 | Delete the first paragraph of Policy SS4 and replace it by the following paragraph:-Wherever practicable, development proposals should seek to retain and enhance traditional buildings and structures, especially those dating from previous centuries, which make a positive contribution to the villages and rural settlements of the area. Delete the second sentence in criterion 8 of Policy SS4. | For clarity and accordance with national planning policy guidance. |
| Recommended Modification 5 | Delete the second paragraph of Policy SS6 and incorporate the third and fourth paragraphs within a revised Policy SS7. Delete the second sentence in the fifth paragraph of Policy SS6 and amend the first sentence to read as follows:- Developments are encouraged to prioritise the re-development and re-use of existing brownfield sites and buildings, provided the proposed site or buildings do not have a high environmental value such as for biodiversity. | Clarification of text. Interests of consistency and accuracy. Merge of policies and removal of overlap. In consistency with the NPPF. |
| Recommended Modification 6 | Replace Policy SS7 by the following revised policy:- All sites proposed for housing development within the settlement boundaries of Stretton Sugwas and Swainshill will be required to meet the following criteria: 1. The proposed development should be well related to the settlement within which it is located and respect the size of the | Interests of clarity and accuracy. Merge of policies and removal of overlap. Ensure policy is flexible. Ensure policy is in conformity to the |

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| | <p>settlement in terms of its scale and character;</p> <ol style="list-style-type: none"> 2. proposed development should not be of such a scale that it would: <ol style="list-style-type: none"> a. significantly harm neighbours' enjoyment of their homes and gardens including through loss of light or traffic movements; b. have a detrimental effect on the openness of the countryside; c. lead to an unacceptably adverse impact on existing local services and infrastructure; d. have such an adverse impact on the local road network that it cannot be satisfactorily mitigated; 3. proposals should demonstrate physical and visual linkages to the existing built-up area; 4. any proposals for new development along the A438 at Swainshill should include a road traffic noise risk assessment taking into account the design and layout of the site; 5. the layout and design of housing schemes should provide for the development to be broken into small groups of houses or clusters of up to five properties wherever possible; 6. development should seek to reduce the environmental impacts of traffic and transport with layouts to facilitate walking and cycling; 7. schemes should include a mix of housing types and sizes to meet local needs as identified in an up-to-date local housing needs assessment. | <p>NPPF and CS policies.</p> <p>Ensure policy is implementable.</p> |
| <p>Recommended Modification 7</p> | <p>Include a reference to road traffic noise impacting development along the A438 at Swainshill as part of the justification for criterion 4 in revised policy SS7 within the explanatory text for the policy. Also, include reference to the maintenance of the local character of small and fragmented groups of houses and smallholdings as justification for criterion 5 in the revised policy.</p> | <p>Interests of consistency and accuracy.</p> <p>Conformity to Core Strategy.</p> |
| <p>Recommended modification 8</p> | <p>Replace the word 'and' on the first line of Policy SS8 by 'for' and delete all of the first sentence after '... affordable housing,'.</p> <p>Section 5 - Formal conclusion and overall recommendations including consideration of the referendum area.</p> | <p>Interests of accuracy and clarity.</p> <p>Conformity to Core Strategy.</p> |
| <p>Recommended modification A</p> | <p>I recommend that the modifications recommended in this report be made to the Stretton Sugwas Neighbourhood Development Plan 2019 - 2031 and that the draft plan as modified be submitted to a referendum.</p> | <p>In accordance with national legislation.</p> |
| <p>Recommended modification B</p> | <p>The area for the referendum should be extended to cover the parish of Stretton Sugwas as constituted on 1st April 2019.</p> | <p>In accordance with national legislation.</p> |