

# Environmental Report

Report for:

**Bodenham Neighbourhood Area**

**September 2017**



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## Non-technical summary

Strategic Environmental Assessment (SEA) is an important part of the evidence base which underpins Neighbourhood Development Plans (NDP), as it is a systematic decision support process, aiming to ensure that environmental assets, including those whose importance transcends local, regional and national interests, are considered effectively in plan making.

Bodenham Parish Council has undertaken to prepare an NDP and this process has been subject to environmental appraisal pursuant to the SEA Directive. The parish of Bodenham lies 7 miles north of Hereford and 6 miles south of Leominster. There are two main centres of populations within the parish; Bodenham and Bodenham Moor.

The Parish area consists of 8 ancient woodland, 8 Special Wildlife Sites, 3 Sites of Special Scientific Interest and 5 unregistered park and gardens, 1 conservation area and the River Wye Special Area of Conservation.

Two villages; Bodenham and Bodenham Moor are highlighted within the Core Strategy for proportionate growth. The parish as a whole has a good range of community facilities including a parish hall, church, chapel, post office, shop, garage, general stores, hairdressers, GP surgery and primary school.

The Draft Bodenham NDP includes 12 objectives, which are designed to deliver the overarching vision on the ground, and it is intended that these objectives will be supported by 13 criteria based planning policies ranging from housing, flood risk, employment and environment. Alternative options were considered prior to reaching a decision over the format of the draft plan.

The environmental appraisal of the Bodenham NDP has been undertaken in line with the Environmental Assessment of Plan and Programmes Regulations 2004. Stage A of the SEA process involved Scoping and Stage B provided a review and analysis of the NDP. Stage C involved preparing an Environmental Report and Stage D comprises a formal consultation on both this and the Draft and Submission Plan itself.

Habitat Regulations Assessment (HRA) screening has been carried out of the Parish and has determined that a full assessment is not required. Natural England have concurred with this conclusion and a separate report has been produced.

It is considered that the Bodenham NDP is in general conformity with both national planning policy contained in the National Planning Policy Framework and strategic policies set within the Herefordshire Local Plan (Core Strategy). Nor does it propose any growth that would be over and above that prescribed by strategic policies. Therefore no changes to the NDP are recommended as a result of the SEA.

Once made (adopted) by Herefordshire Council, the effects of the policies within the Bodenham NDP will be monitored annually via the Council's Authority Monitoring Report (AMR).

## 1.0 Introduction

- 1.1 This report forms the draft Strategic Environmental Assessment (SEA) of the Bodenham Neighbourhood Development Plan (NDP).
- 1.2 The Bodenham NDP proposes two settlement boundaries and windfall criteria policies for housing and employment. Bodenham and Bodenham Moor are settlements highlighted for proportional levels of growth in Policy RA2 of the Herefordshire Local Plan (Core Strategy) and the policies seek to meet this requirement given the existing commitments within the parish. The NDP also provides general policies for guiding future development across the parish as a whole.

### Purpose of the SEA

- 1.3 SEA is a requirement of EC Directive 2001/42/EC (the SEA Directive) which requires the assessment of the effects of certain plans and programmes on the environment to ensure that the proposals in that plan or programme contribute to the achievement of sustainable development.
- 1.4 The Directive was transposed into domestic legislation through the Environmental Assessment of Plans and Programmes Regulations 2004 which applies to plans with significant environmental effects.
- 1.5. A screening opinion was carried out on the Bodenham NDP and it concluded that due to the range of environmental designations in and around the parish, there may be significant environmental effects and consequently an SEA would be required.

### Parish Neighbourhood Plan Context

- 1.6 The parish of Bodenham lies 7 miles north of Hereford and 6 miles south of Leominster. There are two main centres of populations within the parish; Bodenham and Bodenham Moor.
- 1.7 The Parish area consists of 8 ancient woodland, 8 Special Wildlife Sites, 3 Sites of Special Scientific Interest and 5 unregistered park and gardens, 1 conservation area and the River Wye Special Area of Conservation.
- 1.8 Two villages; Bodenham and Bodenham Moor are highlighted within the Core Strategy for proportionate growth. The parish as a whole has a good range of community facilities including a parish hall, church, chapel, post office, shop, garage, general stores, hairdressers, GP surgery and primary school. The Draft Bodenham NDP includes 12 objectives, which are designed to deliver the overarching vision on the ground, and it is intended that these objectives will be supported by 13 criteria based planning policies ranging from housing, flood risk, employment and environment. Alternative options were considered prior to reaching a decision over the format of the draft plan.
- 1.9 The vision for Bodenham parish in 2031 is set out in a detailed Vision Statement.
- 1) A single, vibrant, caring and safe community in which all residents feel comfortable and valued. Careful integration of existing and planned new housing is essential.
  - 2) The open and green character of the villages within the parish not only maintained, but enhanced. Further measures to lessen the risks of homes being flooded and everyday life being disrupted by flooded roads are seen as a high priority and no development should be allowed which can directly or indirectly increase the flooding risk.
  - 3) The need for Bodenham Moor and Bodenham to accommodate more housing by 2031. However, the numbers of dwellings must be compatible with the environmental constraints and economic and social objectives of the plan. The rural character of the villages promoted through the adoption of appropriate building styles and low housing

densities, whilst maintaining and continuously improving the infrastructure of the parish.

1.10 The 12 NDP objectives which underpin this vision are:

- 1) To meet Herefordshire Council's adopted Core Strategy's requirement for new housing in the parish over the plan period 2011-2031
- 2) To identify land for required new development
- 3) To define the extent and location of built development over the plan period 2011-2031
- 4) To ensure that new housing meets local needs in terms of size, type and affordability, is well designed and sustainable. Makes best use of existing under and disused land and buildings, and enhances the distinctive rural character and appearance of the parish's main settlements and landscape.
- 5) To promote measures which will encourage more young people to live in the parish
- 6) To support new employment proposals where these are of appropriate scale and type, are consistent with the rural character of the parish and do not adversely affect residential amenity.
- 7) To protect and enhance local community facilities and services and to support the provision of new ones
- 8) To pursue measures to improve the safety of local roads, to increase the capacity and reliability of local infrastructure systems and to reduce the flood risk to properties in the parish
- 9) To identify those community needs and infrastructure to be met with the help of development contributions
- 10) To protect and enhance the local landscape, particularly with regard to the setting of the Bodenham and Bodenham Moor settlements
- 11) To protect and improve the parish's public rights of way and open spaces, with particular reference to Bodenham Lake and the parish's other designated areas of importance for biodiversity.
- 12) To encourage renewable energy proposals and resource efficiency in new developments where these do not adversely affect the amenity of local residents or impact on the rural character of the parish landscape or settlement.

### **Context of Neighbourhood Plans**

- 1.11 NDPs are a relatively new type of planning document that form a key part of the Government's localism agenda. They enable local communities to develop plans that reflect local aspirations, in accordance with strategic policies.
- 1.12 The Bodenham NDP must therefore conform to national planning policy set within the NPPF and strategic level local policy including the Herefordshire Local Plan (Core Strategy).
- 1.13 The Herefordshire Local Plan (Core Strategy) was adopted on 16 October 2015.
- 1.14 Paragraph 216 of the NPPF and Planning Practice Guidance set out the weight that may be given to relevant policies in emerging plans, including NDPs, and indicated that weight may be given to relevant policies in emerging NDPs according to:
- The stage of preparation of the emerging plan (the more advanced the preparation, the greater the weight that may be given);
  - The extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
  - The degree of consistency of the relevant policies in the emerging plan to the policies in this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).
- 1.15 This part of the NPPF is reinforced by Planning Practice Guidance published in March 2014, which is clear that an emerging NDP may be a material planning consideration once it has

completed submission/local authorities publication stage (Regulation 16). This is reinforced by recent ministerial statements and case law (West Sussex), all of which have demonstrated that an emerging NDP may be a material consideration at the Regulation 16 stage.

- 1.16 Table 4.14 of the Local Plan (Core Strategy) lists Bodenham and Bodenham Moor among the settlements which it considers to be sustainable locations for proportional growth in line with the provisions of Policy RA2. This policy is expected to facilitate the delivery of 5,300 homes across the areas outside Hereford and the Market Towns in accordance with Policy RA1 and it anticipates that NDPs will be the principal mechanism for delivering growth in the rural areas.
- 1.18 Once made (adopted) by Herefordshire Council, the Bodenham NDP will have a role in guiding future development proposals within the parish, by setting out policies against which planning applications will be determined.

### **Structure of SEA**

- 1.19 The structure of the document is as follows:
- Section 2 – Explains the SEA methodology and summarises the comments received in respect of the SEA Scoping Report
  - Section 3 - Introduces the Bodenham NDP objectives and the SEA framework
  - Section 4 - Appraises the objectives set within the NDP against the SEA framework
  - Section 5 - Appraises the options set within the NDP against the SEA framework
  - Section 6 – Appraises the policies set within the NDP against the SEA framework
  - Section 7 – Discusses the implementation and monitoring of the NDP
  - Section 8 - Concludes the SEA report by outlining next steps

## 2.0 Methodology

2.1 The SEA process comprised several stages which are summarised, in some detail, below.

2.2 Stage A involved 4 tasks and culminated in a Scoping Report:

- *Task A1:* Identified and reviewed relevant policies, plans and programmes and environmental protection objectives from European, National and Local sources.
- *Task A2:* Collected baseline information to provide a picture of past, present and likely future conditions within the area. This helped to establish indicators which will be used to monitor the effects and performance of the Bodenham NDP.
- *Task A3:* Focused on the environmental issues identified from the baseline, highlighting key issues and problems within the neighbourhood area.
- *Task A4:* Used the information gathered from Tasks A1-A3 to develop a set of SEA objectives, sometimes referred to as the 'sustainability framework'.
- *Task A5:* Collated the results of Tasks A1-A4 within a Scoping Report, a document which was subject to a statutory 5 week consultation.

2.3 Stage B involved 4 tasks and assessed the effects of the NDP.

- *Task B1:* Tested NDP Objectives against the SEA Objectives
- *Task B2:* Developed and refined the NDP options and policies.
- *Task B3/B4:* Predicted and evaluated the significant effects of the NDP

2.4 Stage C involved preparing an Environmental Report. This report presents information compiled during Stage B of the SEA process and constitutes the Draft Environmental Appraisal of the NDP. It accompanies the submission Plan during its formal Regulation 16 consultation with people who live, work and carry out businesses in the neighbourhood area, as well as statutory bodies listed in the Neighbourhood Planning (General) Regulations 2012.

2.5 Producing an Environmental Report was therefore a legal requirement and the submission of this report to Herefordshire Council forms Stage D of the SEA process.

### Scoping Report Consultation

2.6 With regard to the SEA scoping assessments, documents A1 to A4 were completed by a Herefordshire Council Planning Officer and sent to the Parish Council for comment, in readiness for a 5 week consultation with statutory bodies, pursuant to the Environmental Assessment of Plans and Programmes Regulations 2004.

2.7 After the document was approved by the Parish Council, Bodenham SEA Scoping Report was available to four<sup>1</sup> statutory bodies for consultation from 3 October to 7 November 2014.

### Consultation outcomes from Statutory Consultees

2.8 The consultation resulted in 2 responses, both of which are attached at Appendix 3.

2.9 Both responses were collated and incorporated within this document where relevant.

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<sup>1</sup> Statutory consultation bodies: Natural England; English Heritage; Environment Agency Natural Resources Wales

**Natural England:** update to appendix A1 to include a number of additional documents. Additional detail added regarding priority habitats and details regarding Agricultural land classification should be added.

*Response: The documents referred to have been updated in A1 and further baseline data has been incorporated at A2.*

**English Heritage:** No substantive objection to the content of the document and comments to earlier tranches of SEA Scoping reports remain relevant.

*Response: Comments are noted and necessary changes made*

**Environment Agency:** No comments received

**Natural Resources Wales:** No comments received



### 3.0 The SEA Framework

3.1 As mentioned previously, Stage A of the SEA identifies and reviews relevant policies, plans and programmes and environmental protection objectives from European, National and Local sources (refer to Table A1 in Appendix 2 for details of those documents that were reviewed in completing Stage A of SEA on the Bodenham NDP).

3.2 The requirement to undertake this 'context review' is contained in Annexes 1(a) and (e) of the SEA Directive which states that an Environmental Report should include:

*"...an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes" and*

*"...the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation"*

#### Policy context

3.3 The Bodenham NDP will deliver the Local Plan (Core Strategy) at parish level by adding locally specific detail to strategic policies. As a consequence, the Scoping Report for the NDP was based on the context review Herefordshire Council undertook for its Local Plan (Core Strategy).

3.4 The results of this assessment (context review) provide the source of the local baseline data and have been incorporated into the SEA framework. It should be noted that:

- No list of policies, plans and programmes can ever be exhaustive and that Herefordshire Council has selected those considered to be of particular relevance to the planning system;
- New or revised plans and policies can emerge during the SEA process

3.5 The following plans, policies and programmes have been reviewed and, where appropriate, incorporated within the SEA Framework objectives:

- *The EC Conservation of Habitats and Species Regulations (2010)* - These regulations transpose the Habitats Directive in England, Wales and to a limited extent Scotland by ensuring that activities are carried out in accordance with the Habitats Directive, which is to protect biodiversity through the conservation of natural habitats and species of wild flora and fauna.
- *The EC Water Framework Directive (2000)* - Commits all EU member states to achieve good qualitative and quantitative status of all water courses by 2015
- *The Wildlife and Countryside Act (1981)* - The major legal instrument for wildlife protection in Britain, although other significant acts have been passed since. It has numerous parts and supplementary lists and schedules many of which have been amended since publication.
- *Biodiversity 2020: A strategy for England's wildlife and ecosystem services (2011)* - Forms part of the UK's Post-2010 Biodiversity Framework by setting out England's contribution towards the UK's commitments under the United Nations Convention of Biological Diversity.
- *The Countryside and Right of Way Act (2000)* - Creates a statutory right of access on foot to certain types of open land, to modernise the public rights of way system, to strengthen nature conservation legislation, and to facilitate better management of AONBs

- *The Natural Environment and Rural Communities Act (2006)* - Designed to help achieve a rich and diverse natural environment and thriving rural communities through modernised and simplified arrangements for delivering Government policy.
- *Revised EU Sustainable Development Strategy (2009)* - Sets out a single strategy on how the EU will more effectively meet its long-standing commitment to meet the challenges of sustainable development.
- *National Planning Policy Framework (NPPF) (2012)* - Consolidates the suite of PPG/PPS into one succinct planning policy document.
- *Planning Practice Guidance (2013)* - Sets out the vision, objectives and policies for the Herefordshire Local Plan (Core Strategy), which will guide development across the county up to 2031.
- *Herefordshire Local Transport Plan 4 (LTP) 2015-2018* - Sets out the Council's strategy for supporting economic growth, social inclusion and reducing the environmental impacts of transport, as well as the program of investment for the period April 2015 to April 2017.
- *Understanding Herefordshire Report (2014)* - Important to understand the place such as the local economy natural and built environment in which people live, learn and work as part of understanding their quality of life. Enable development for economy and housing to the required levels and growth should be supported by sustainable transport measures.
- *Malvern Hills AONB Management Plan 2014-2018 (20014)* - Identifies the issues and challenges facing the special features of the area and contains 24 guiding principles and 46 strategic objectives which will help address them.
- *Wye Valley AONB management Plan 2014-2017 (20014)* - The Management Plan is the prime document which sets out the vision for the area and the priorities for its management.
- *Herefordshire Economic Development Strategy 2011-2016* - Aims to increase the economic wealth of Herefordshire by setting out proposals to support business growth up to 2016.
- *Herefordshire Employment Land Study (2012)* - Includes employment land assessments for the plan period 2011-2031. The study includes Quantitative and Qualitative assessments of employment land, assessment of market demand and need, as well as providing forecasts and recommendations for future employment need over the plan period.
- *Herefordshire Strategic Housing Land Availability Assessment (SHLAA) (2009)* - The SHLAA aims to justify site allocations in plans by:
  - Identifying sites which are capable of delivering housing development
  - Assessing sites for their housing potential; and
  - Predicting when a site could be developed for housing.
- *Herefordshire Local Housing Market Assessment (LHMA) (2013)* - Builds on an earlier Strategic Housing Market Assessment (SHMA) developed for Herefordshire and Shropshire. Its purpose is to inform the Local Plan's policies regarding housing need and demand (for market and affordable housing) within each of the 7 Housing Market Areas (HMAs) in Herefordshire between 2011 and 2031.

- *Herefordshire Local Housing Requirements Study (2012)* - Technical assessment of the housing market and potential future local housing requirements which supports planning policy regarding the amount of growth, housing tenure and housing type needed within Herefordshire up to 2031.
- *Herefordshire Rural Housing Background Report (2013)* - Provides the justification for the proportional housing growth targets outlined in the Core Strategy
- *Herefordshire Draft Gypsies and Travellers Assessment (2013)* - Assesses the accommodation needs of Gypsies and Travellers across Herefordshire.
- *Herefordshire Local Biodiversity Action Plan (2007)* - Focuses conservation efforts on the areas within Herefordshire that will result in the greatest benefit for ecological networks, habitats and species.
- *Building Biodiversity into the LDF (2009)* - Provides the Council's Local Plan (Core Strategy) with evidence in respect of biodiversity and geodiversity, identifying both opportunities and constraints across Herefordshire.
- *Herefordshire Green Infrastructure Strategy (2010)* - Develops a framework of natural and culturally important features and functions so that planning for a sustainable future is at the heart of planning within Herefordshire.
- *Renewable Energy Study (2010)* - Assesses the energy demand within Herefordshire and the ability for the county to accommodate renewable and low carbon energy technologies.
- *Herefordshire Playing Pitch Assessment (2012)* - Produces a strategic framework, audit and assessment and needs analysis of outdoor sports pitches and facilities for Herefordshire. The document arises as a result of a recommendation in the Herefordshire and Worcestershire Sports Facilities Framework to develop local standards for playing fields and sports pitches throughout Herefordshire.
- *Open Spaces Study (2006)* - The 2006 space audit and assessment of need is a snap shot of the quality, quantity and distribution of open space across Herefordshire.
- *Play Facilities Study (2012)* - The Play Facilities Study 2012 updates the previous play facilities analysis under the Open Spaces Study 2006 and provides guidance and a framework for the development, delivery and continued sustainability of providing new and improved play facilities for children and young people in Herefordshire to 2031.
- *Strategic Flood Risk Assessment (SFRA) and Water Cycle Study (2009)* - The SFRA provides a summary of flood risk in Herefordshire to inform the location of future development. The Water Cycle Study examines how water resources and water supply infrastructure, wastewater treatment, water quality, sewerage and flood risk could constrain growth across Herefordshire.

3.6 Appendix 1 of the Bodenham Plan Scoping Report provides additional detail on the Plans, Policies and Programmes mentioned above and identifies the implications for the SEA and NDP.

### SEA Objectives and baseline characteristics

- 3.7 The SEA objectives that were used at Stages A and B of the process are listed in the following table.

SEA Objective	
1	To maintain or enhance nature conservation (biodiversity, flora and fauna)
2	To maintain or enhance the quality of landscapes and townscapes
3	To improve the quality of surroundings
4	To conserve or where appropriate enhance the historic environment and culture heritage
5	To improve air quality
6	To reduce the effect of traffic on the environment
7	To reduce contributions to climate change
8	To reduce vulnerability to climate change
9	To improve water quality
10	To provide for sustainable sources of water supply
11	To avoid, reduce and manage flood risk
12	To conserve soil resources and quality
13	To minimise the production of waste
14	To improve the health of the population
15	To reduce crime and nuisance
16	To conserve natural and manmade resources

- 3.8 The SEA objectives detailed above conform to the SEA Directive, and are derived from the Sustainability Appraisal undertaken for the Herefordshire Local Plan (Core Strategy) 2011-2031.
- 3.9 Baseline information gathered during Stage A of the SEA process provided details of the current environmental characteristics of the neighbourhood area and the status of its natural assets and features (refer to Appendix 2). This information was analysed as part of Task B2 of SEA, which looked at the extent to which the emerging NDP policies will help or obstruct these characteristics. There are four objectives for which no local information is available, which provides a limitation on the baseline data and whether the NDP policies are likely to improve or exacerbate existing problems and issues relating to these themes.
- 3.10 Following the completion of Task B2 of SEA it was apparent that the largest environmental issue within the parish is objectives surrounding reducing and managing flood risk and the protection of the natural and built environment. The parish is predominately rural in nature, with two defined settlement boundaries. Development in this area over the plan period will predominately be via existing commitments and windfall development. This means that the full impacts on the SEA objectives will be tested at the planning application stage when the full details of the location are known. The need for robust environmental criteria based policy is therefore important as the plan text is developed.

## 4.0 Assessing the NDP Objectives

4.1 The following objectives, as set out in the NDP, aim to realise the vision for Bodenham parish in 2031:

- 1) A single, vibrant, caring and safe community in which all residents feel comfortable and valued. Careful integration of existing and planned new housing is essential.
- 2) The open and green character of the villages within the parish not only maintained, but enhanced. Further measures to lessen the risks of homes being flooded and everyday life being disrupted by flooded roads are seen as a high priority and no development should be allowed which can directly or indirectly increase the flooding risk.
- 3) The need for Bodenham Moor and Bodenham to accommodate more housing by 2031. However, the numbers of dwellings must be compatible with the environmental constraints and economic and social objectives of the plan. The rural character of the villages promoted through the adoption of appropriate building styles and low housing densities, whilst maintaining and continuously improving the infrastructure of the parish.

4.2 The table below tests these NDP objectives against the SEA objectives, providing a summary of the results of Task B1 of SEA. The full results are available at Appendix 4 of this report.

4.3 The majority of those NDP objectives which have a relationship with the SEA framework are positively compatible with it or have a neutral effect.

4.4 It is impossible to appraise the full implications of NDP objective 1 and 3 at this stage given the lack of detail over the exact locations of development that may come to fruition as a result of the implementation of this objectives; however, it is accepted that further development of the planning policies that relate to these objectives would move them towards a compatible outcome.

Key:	
+	Compatible
-	Possible conflict
0	Neutral
X	No relationship between objectives
?	Unclear, more information needed

NDP Objectives	SEA Objectives															
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Objective 1	?	?	?	?	+	o	?	?	?	+	?	o				?
Objective 2	?	+	+	?	+	o	?	?	?	+	?	+				+
Objective 3	+	+	+	+	+	+	+	+	+	+	+	+				+
Objective 4	+	+	+	+	+	+	+	+	+	+	?	+				+
Objective 5	x	+	+	+	+	+	x	x	x	x	x	x				x
Objective 6	+	+	+	+	?	o	?	?	?	+	?	+				+
Objective 7	x	+	+	x	+	+	+	x	?	x	?	+				+
Objective 8	?	+	+	?	+	+	x	+	+	+	++	+				+
Objective 9	x	+	+	+	+	+	x	x	x	x	+	x				+
Objective 10	+	+	+	+	+	x	+	+	+	+	+	+				+
Objective 11	+	+	+	+	+	+	+	+	+	+	+	+				+
Objective 12	?	+	+	+	+	x	+	?	?	+	?	+				+

## 5.0 Assessing the NDP Options

5.1 All options that were considered by the NDP steering group during the development of their plan have been assessed as part of the SEA and the summary matrix of the assessment can be found in Table B2 at Appendix 4.

5.2 The options covered were as follows;

- Option 1 Do nothing
- Option 2 Allocate sites for housing
- Option 3 Manage future housing growth using a settlement boundary
- Option 4 Allocate sites and identify a settlement boundary
- Option 5 Allocations for new businesses
- Option 6 Criteria for small scale business development and home working
- Option 7 Housing in Bodenham Moor only
- Option 8 Housing in Bodenham only
- Option 9 Housing in both settlements

5.3 A 'do nothing' option was also considered, i.e. not undertaking an NDP, however this was disregarded at an early stage by the Parish Council as it was considered the majority of the community would support the work undertaken for an NDP.

5.4 The option of designating settlement boundaries would also have seen a positive effect on the baseline. The designation of two settlement boundaries would give additional certainty and help define those areas considered as the built form and open countryside. This can aid the direction of further growth to maintain the quality of the landscape and surroundings. There is less certainty over the positive effects on the baseline for any growth adjudged by criteria based policy.

5.5 A settlement boundary already existed for Bodenham Moor. Therefore it was logical to continue with this as a means of defining the growth area as 63% of survey responses indicated a wish to see the continuation of this. In Bodenham, 54% of survey responses indicated the preference for a boundary to be defined.

5.6 Options to proportion the growth within the two settlements contained within RA2 of the Core Strategy were also considered. It was considered that on balance, proportioning the growth between the two settlements had the greatest positives and was locally favoured.

NDP options	SEA Objectives															
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Option 1	x	x	x	x	x	x	x	x	x	x	x	x				x
Option 2	++	++	++	++	++	+	++	++	++	+	++	+				++
Option 3	+	+	+	+	+	+	+	+	+	+	+	+				+
Option 4	++	++	++	++	++	+	++	++	++	+	++	+				++
Option 5	?	?	+	++	0	0	+	+	++	+	++	+				++
Option 6	+	+	+	+	+	+	+	+	+	+	+	+				+
Option 7	?	+	+	+	+	+	+	+	+	+	?	+				+
Option 8	?	+	+	?	+	+	+	?	+	+	?	+				+
Option 9	+	+	+	+	+	+	+	?	+	+	?	+				+

## 6.0 Appraisal of the policies

6.1 A key part of developing a plan such as the Bodenham NDP is developing a range of options and testing these, so that a preferred way forward can be selected.

6.2 The plan has been organised with a set of general overarching policies for the whole neighbourhood area and these emerging set of draft policies have been appraised for the purposes of Stage B of the SEA:

- Policy BNDP1 Delivering new housing
- Policy BNDP2 Settlement boundaries
- Policy BNDP3 Mix, type and tenure of new housing development
- Policy BNDP4 Flood risk and drainage
- Policy BNDP5 Employment
- Policy BNDP6 Local community facilities
- Policy BNDP7 Protecting landscape and important public views
- Policy BNDP8 Landscape design principles
- Policy BNDP9 Protection of local character
- Policy BNDP10 Open spaces
- Policy BNDP11 Renewable energy

### Stage B of SEA

6.3 In the context of Task B1 of SEA, the previous section of this report identified that many of the NDP objectives are compatible with the SEA framework, and policy safeguards within the NDP and Local Plan (Core Strategy) would help mitigate any possible conflicts.

6.4 With regard to Task B2 of SEA, the NDP policies were measured against both the SEA framework and the baseline characteristics identified during Stage A of the process; here, there was no baseline data available in respect of SEA Objectives 13, 14 and 15. Full details of this appraisal are attached at Appendix 4.

6.5 The policies largely score as positive against the SEA objectives and will not, therefore, have an adverse impact on the baseline characteristics or immediate environmental impacts. This is because they are criteria based policies which only consider schemes on their own merits, as and when planning applications are submitted to the local planning authority.

NDP Policy	SEA Objectives															
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
BNDP1	?	?	?	?	?	?	?	?	?	?	?	?				?
BNDP2	+	+	+	+	+	+	+	+	?	+	+	+				+
BNDP3	?	+	+	+	+	+	+	?	?	+	+	+				+
BNDP4	++	+	+	X	X	X	++	++	+	+	++	+				+
BNDP5	+	+	+	+	+	0	?	?	?	+	+	+				+
BNDP6	X	+	+	X	+	+	+	+	+	X	+	+				+
BNDP7	+	++	++	+	X	X	X	X	X	X	X	+				+
BNDP8	++	++	++	++	+	X	+	+	+	X	+	++				++
BNDP9	++	++	++	++	+	?	?	X	X	X	X	+				+
BNDP10	+	++	++	+	+	X	+	+	X	X	+	+				+
BNDP11	?	+	+	?	X	X	+	X	X	X	?	?				+

- 6.6 Following the completion of Task B2 of SEA it was apparent that the largest environmental issue within the parish, and which has an impact on the County as a whole, is water quality; the River Wye, though currently meeting all its conservation objectives, will require effective management, in order to ensure that the quality of water does not deteriorate to the point that nutrient targets are missed further downstream.
- 6.7 The NDP does not propose that sites be allocated for development and contains only criteria-based policies. The River Lugg passes through the parish and at this point is part of the SAC designation. The Nutrient Management Plan is in place and a number of policies both within the Core Strategy and the Bodenham NDP will provide safeguards in this respect. On this basis, the delivery of the NDP should not exacerbate existing problems regarding water quality or have an unacceptable adverse impact.
- 6.8 The results of Task B3, as shown at Appendix 4, demonstrate that the cumulative impact of the NDP policies over the course of the plan period is generally positive.
- 6.9 Task B4 of SEA brings together the results of earlier tasks and thus identifies the cumulative impact of the entire NDP. This task, which is also attached at Appendix 4, reveals that the objectives and policies contained in the Bodenham NDP are by and large in general conformity with the Local Plan (Core Strategy), which means that the cumulative effect of the plan will contribute to the achievement of the SEA objectives.
- 6.10 None of the NDP policies are considered to be in direct conflict with or propose greater levels of growth and development than strategic policies contained in the Local Plan (Core Strategy), which themselves have undergone a full Sustainability Appraisal.

#### **Stage D of the SEA – assessment of the changes to policies following the draft consultation (Reg14)**

- 6.11 Twelve policies were refined following the Draft plan consultation which took place from 3 October to 14 November 2016. These changes were necessitated by comments received during the consultation period rather than specifically as a result of the Environmental Report.
- 6.12 Two new policies have been added to the plan, these are regarding larger economic activities such as intensive livestock units and a dark skies policies. Nine policies have had amendments which require rescreening and three policies have had minor amendments which are not considered to be significant enough to rescreen.
- 6.13 The policies which have been rescreened are:
- Policy BNDP2
  - Policy BNDP3
  - Policy BNDP4
  - Policy BNDP5
  - Policy BNDP6 (new policy)
  - Policy BNDP9 (previously NDP8)
  - Policy BNDP10 (previously NDP10)
  - Policy BNDP11 (new policy)
  - Policy BNDP13 (previously NDP12)
- 6.14 The results of this further assessment can be seen in detail within Appendix 7. They reveal the outcomes of Stage B process mentioned above were largely unaffected or strengthened by the refinements to the policies.
- 6.15 During the consultation on the draft Environmental Report, concern was raised that regarding the options stage of the assessment and that a settlement boundary and site allocations should have been subject to additional options. The Herefordshire Core Strategy highlights proportional growth targets for a number of settlements including Bodenham and Bodenham



Moor which NDPs are expected to facilitate either via site allocations or positive criteria based policy. For the parish of Bodenham, this proportional growth is 72 dwellings between 2011 and 2031. To date much of this proportional growth has been provided via planning permissions; many of which have commenced, during the lifetime of the NDPs productions.

## **7.0 Implementation and monitoring**

- 7.1 Herefordshire Council as the Local Planning Authority should make arrangements to monitor the significant effects of implementing a neighbourhood plan.
- 7.2 Indeed, Regulation 17 of the Environmental Assessment of Plans and Programmes Regulations 2004 requires the Local Planning Authority to monitor the significant environmental effects of the implementation of any NDP that was subject to SEA, in order to identify unforeseen adverse effects at an early stage and to enable appropriate remedial actions.
- 7.3 Accordingly, Herefordshire Council will monitor outcomes from the NDP policies and the results of these will be reported in the Council's Authority Monitoring Report (AMR).
- 7.4 The AMR runs from 1 April to 31 March each year and the topics covered therein include the following:
- Housing delivery;
  - Previously developed land
  - Housing completions
  - Affordable housing conditions
  - Employment land delivery.

**8.0 Next steps**

- 8.1 This report will be subject to a formal public consultation of 6 weeks duration alongside the Submission Bodenham NDP.
- 8.2 Responses on the Submission NDP will be reviewed and the plan amended where appropriate.
- 8.3 Any changes made to the NDP as a consequence of the examination will trigger a review of the SEA, unless they do not materially affect the outcomes of the Stage B process.

# Appendix 1

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**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)**

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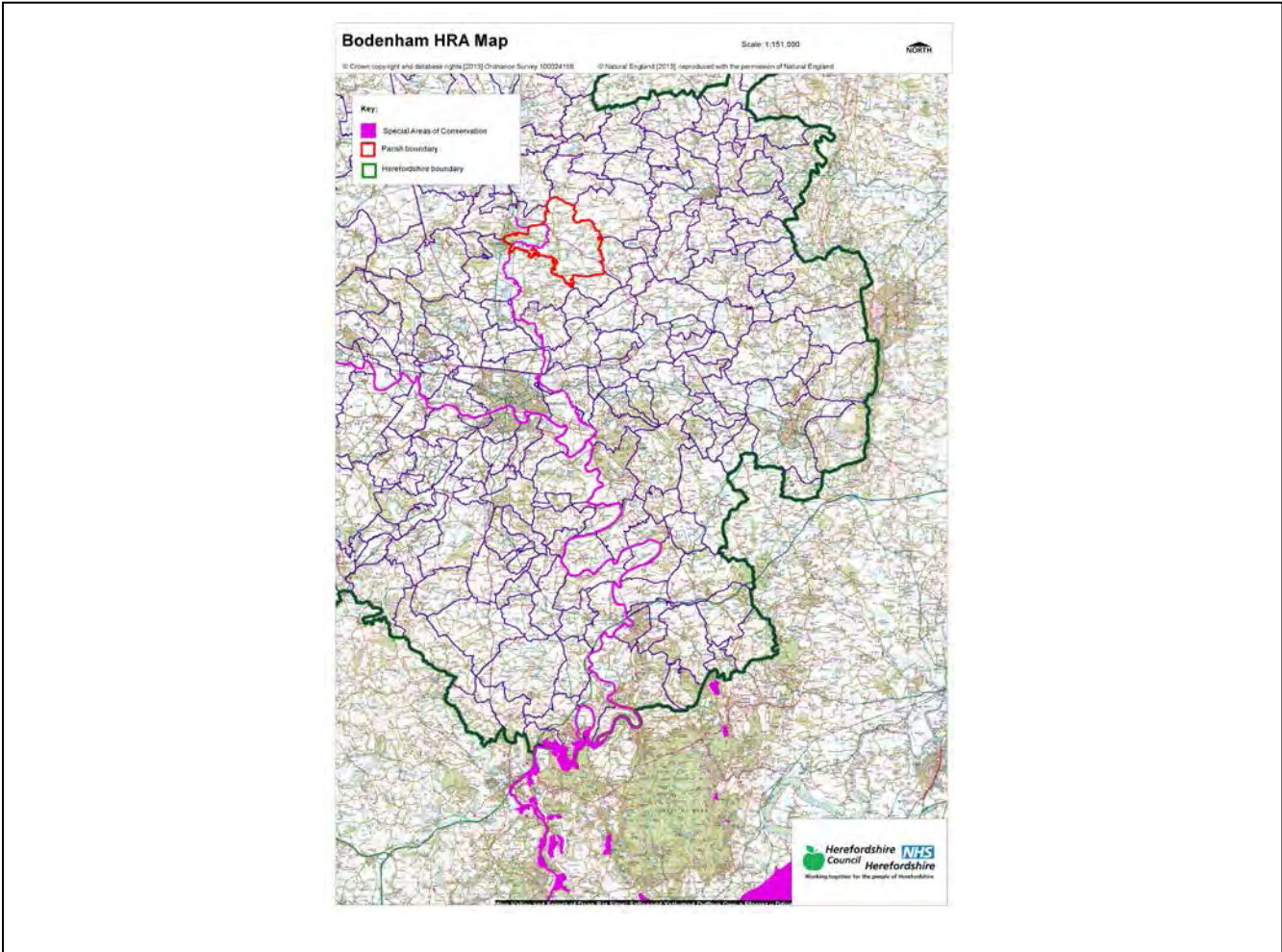
<b>Neighbourhood Area:</b>	Bodenham Neighbourhood Area
<b>Parish Council:</b>	Bodenham Parish Council
<b>Neighbourhood Area Designation Date:</b>	26/04/2013

### **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 Lugg is within the borders of the Parish
Is the Neighbourhood Area in the hydrological catchment of the River Wye (including the River Lugg) SAC?	Y	The Parish is within the River Lugg hydrological catchment area
If yes above, does the Neighbourhood Area have mains drainage to deal with foul sewage?	Y	There is some mains drainage at Bodenham

**Downton Gorge SAC:**

Is the Neighbourhood Area within 10km of Downton Gorge SAC?	N	Downton Gorge is 21.8km 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 46.65km 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 Group Parish is 29.94km 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 35.06km 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 Bodenham 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 Bodenham 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.

<b>SEA features</b>	<b>Total</b>	<b>Explanation</b>	<b>SEA required</b>
Air Quality Management Areas	0	There are no AQMA's within the Parish	N
Ancient Woodland	8	Dinmore Hill Wood, The Rookery, Hill Hole Dingle, Dorlas Coppice, Dudales Wood, Westfields Wood, Combs Hill Wood, Venns Wood	Y
Areas of Archaeological Interest	0	There are no AAI's within the Parish	N
Areas of Outstanding Natural Beauty	0	There are no AONB's within the Parish	N
Conservation Areas	1	Bodenham village is a Conservation Area	Y
European Sites	1	The River Lugg SAC flows through the Parish	Y
Flood Areas		Flood Zones 2 & 3 follow the River Lugg and branch out at 3 brooks and flow towards the eastern border of the Parish	Y
Listed Buildings	Numerous	Numerous listed buildings scattered throughout the Parish	Y
Local Sites (SWS/SINCS/RIGS)	8 (SWS)	Gravel Pits at Bodenham, Dinmore Hill and adjoining Woodland, Dorlas Coppice, Dudales Wood and Old Coppice, Woodlands above Ullingswick, Maund Common, Upper Maund Common, Venns Wood	Y
Long distance footpaths/trails	1	Three Rivers Ride	Y
Mineral Reserves	3	Sites to the west and north and 1 central	Y
National Nature Reserve	0	There are no NNR's within the Parish	N
Registered & unregistered parks and gardens	5 Unregistered	The Vern, Bodenham Manor, Vennwood, Broadfield Court, Hampton Court (border)	Y
Scheduled Ancient Monuments	0	There are no SAM's within the Parish	N
Sites of Special Scientific Interest	3	Hill Hole Dingle (Unfavourable Recovering); River Lugg (Unfavourable Recovering); Dinmore Hill Woods (Unfavourable Recovering)	Y



**Decision Notification:**

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

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

**Assessment date: 23/05/2013**

**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.

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

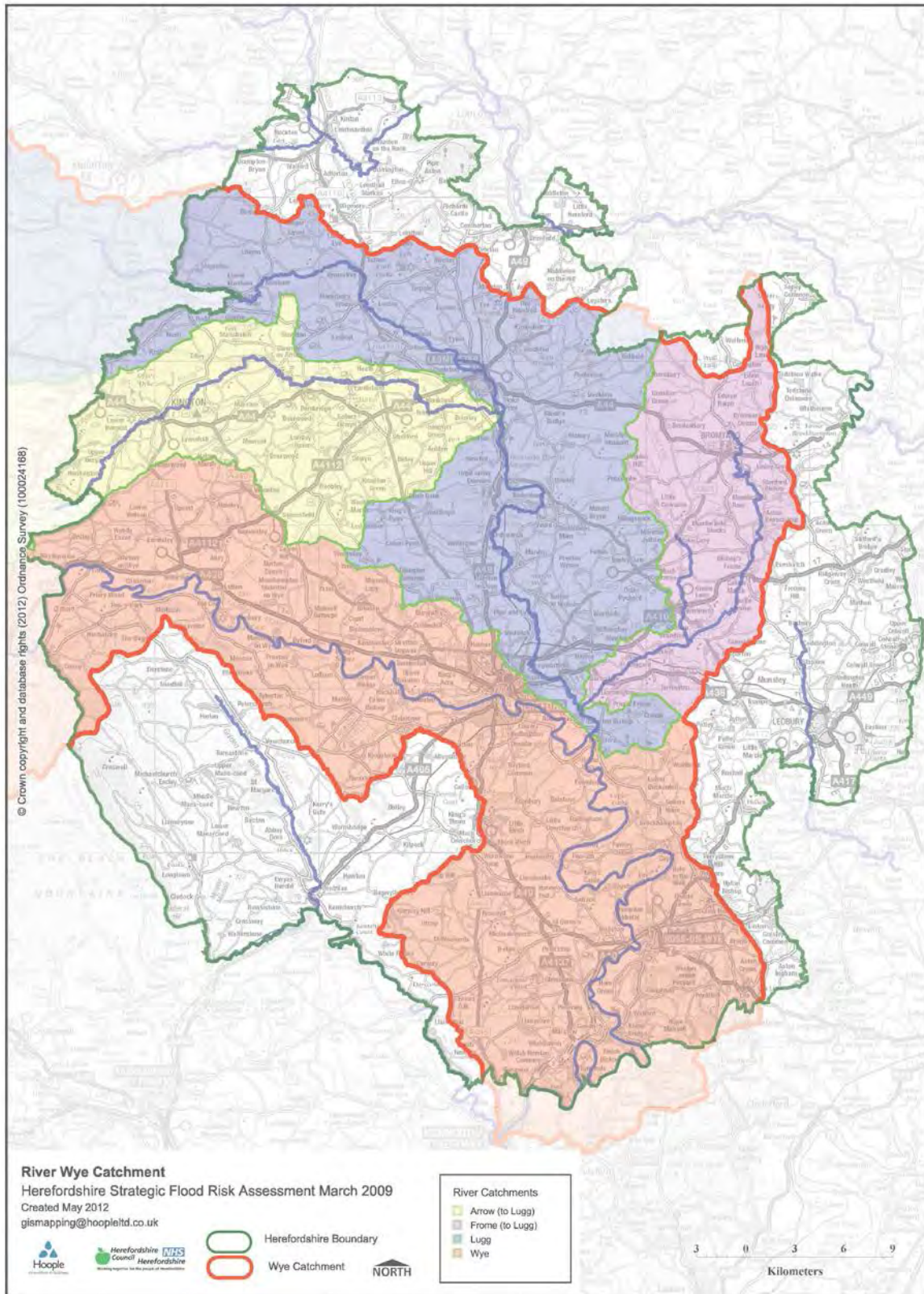
Greater Horseshoe Bat: Large buildings, pasture, edge of mixed deciduous woodland and hedgerows. Mixed land-use especially south-facing slopes, favours beetles, moths and insects they feed on. During the winter they depend on caves, abandoned mines and other underground sites for undisturbed hibernation.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

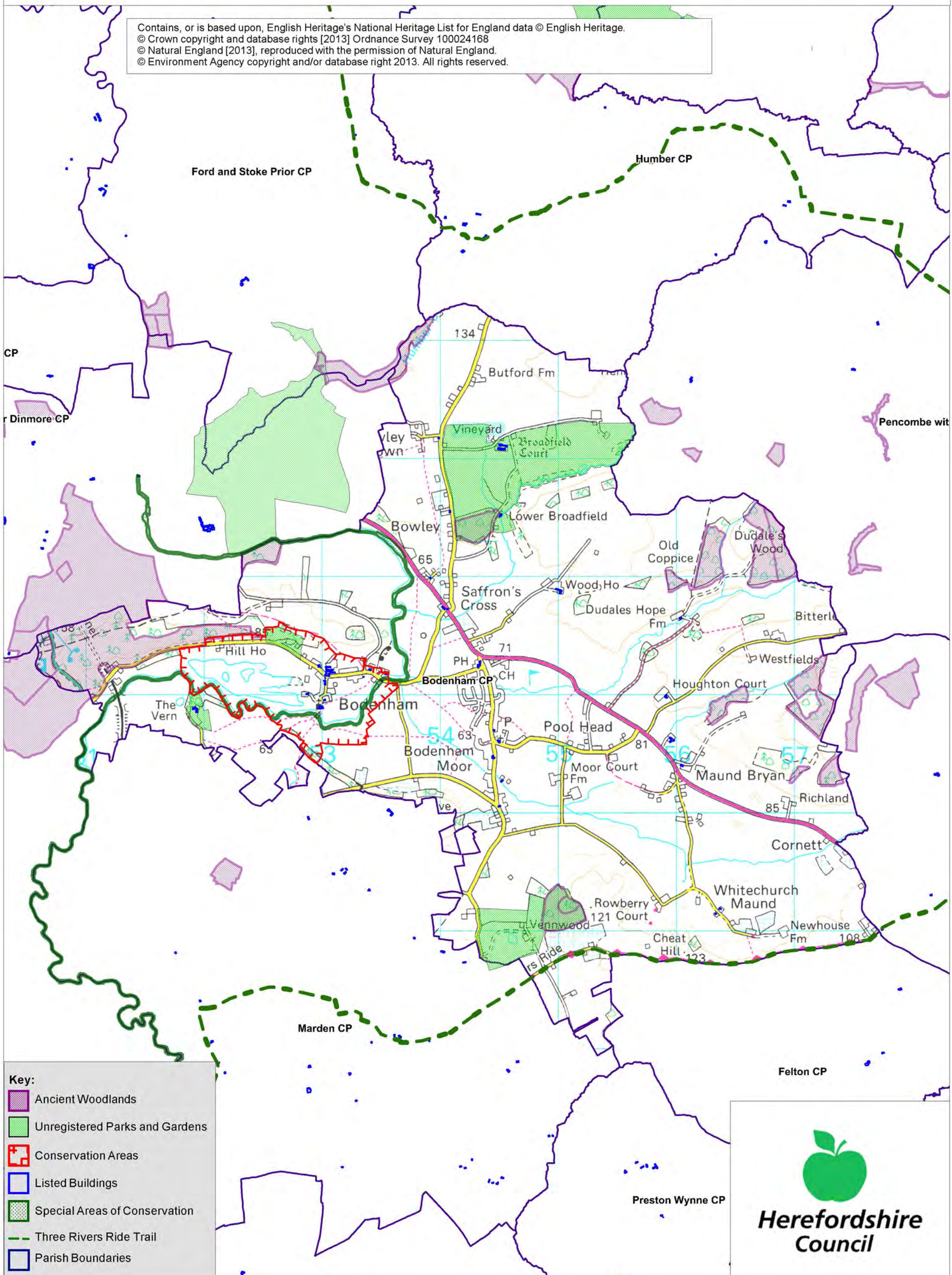


# Bodenham SEA Map 1

Scale: 1:27,800



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**Key:**

- Ancient Woodlands
- Unregistered Parks and Gardens
- Conservation Areas
- Listed Buildings
- Special Areas of Conservation
- Three Rivers Ride Trail
- Parish Boundaries

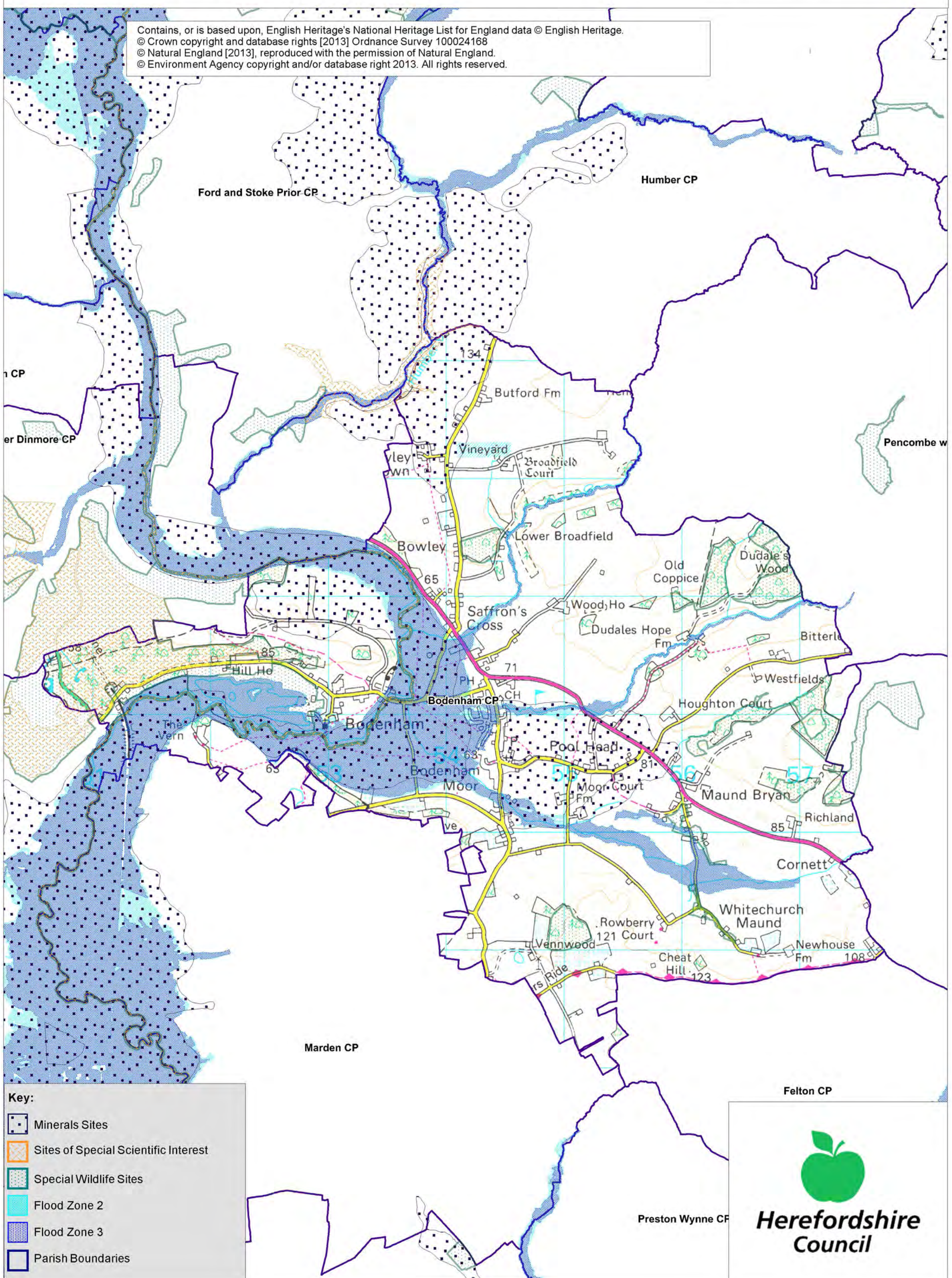
**Herefordshire Council**

# Bodenham SEA Map 2

Scale: 1:27,800



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**Key:**

- Minerals Sites
- Sites of Special Scientific Interest
- Special Wildlife Sites
- Flood Zone 2
- Flood Zone 3
- Parish Boundaries

**Herefordshire Council**

# Appendix 2

# Strategic Environmental Assessment



## Bodenham Neighbourhood Area

Scoping Report

October 2014



## Consultation on the Scoping Report

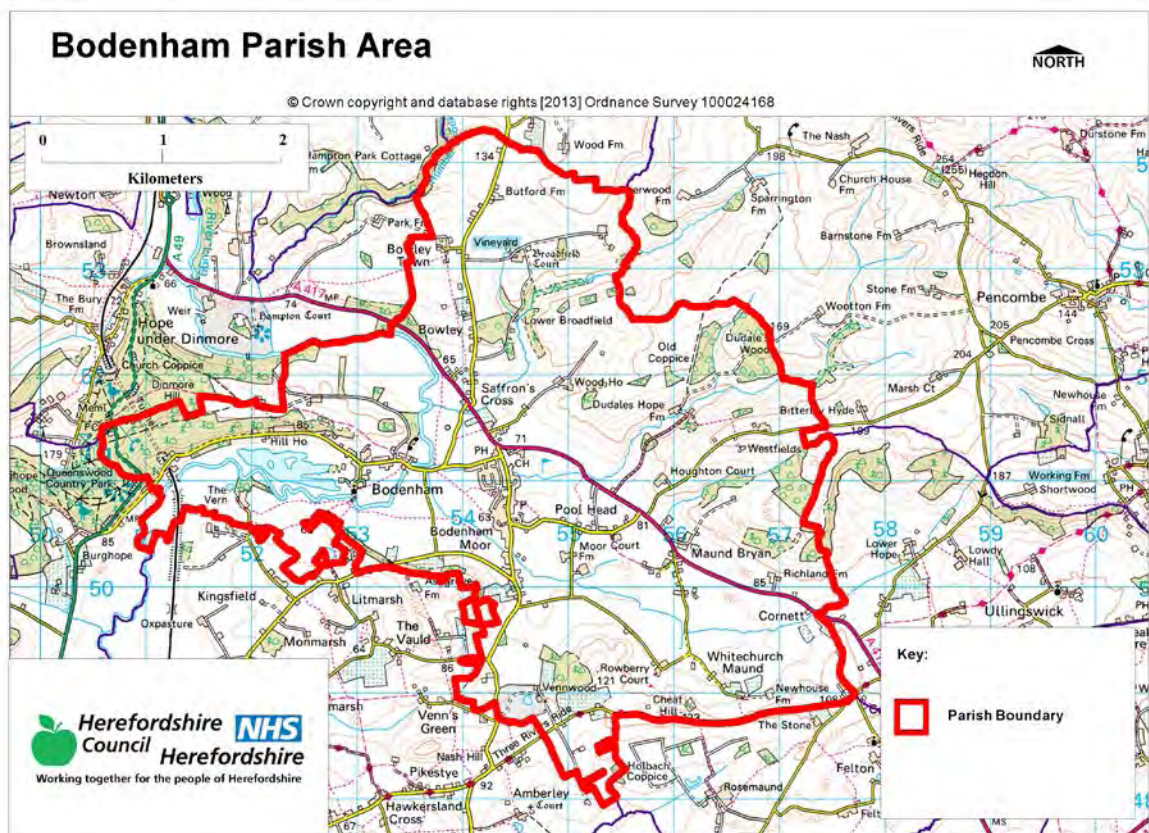
The aim of the consultation process is to involve and engage with statutory consultees and other relevant bodies on the scope of the appraisal. In particular, it seeks to:

- Ensure the SEA is both comprehensive and sufficiently robust to support the Neighbourhood Development Plan during the later stages of full public consultation;
- Seek advice on the completeness of the plan review and baseline data and gain further information where appropriate;
- Seek advice on the suitability of key sustainability issues;
- Seek advice on the suitability of the sustainability objectives.

Comments on this Scoping Report have been invited from the three consultation bodies as required by the SEA regulations, together with the Natural Resources Wales.

The three consultation bodies are as follows:

1. Natural England;
2. English Heritage;
3. Environment Agency.



## Template A1: Identification and review of local Neighbourhood Area relevant plans, policies and programmes

Parish Council Name: Bodenham Parish Council

Neighbourhood Development Plan Name: Bodenham Neighbourhood Plan

Date completed: July 2014

Plans and Programmes	Type of document	Date	Overview	Key message, target/objective/indicator	SEA topic(s) <sup>1</sup>	Implications for the NDP and SEA
Revised EU Sustainable Development strategy	European Union Strategy	2009	Sets out a single strategy on how the EU will more effectively meet its long-standing commitment to meet the challenges of sustainable development.	Recognises the need to gradually change current unsustainable consumption and production patterns and move towards a better integrated approach to policy making. The Strategy sets overall objectives, targets and concrete actions for seven key priority challenges, predominantly environmental: <ul style="list-style-type: none"> <li>• Climate change and clean energy;</li> <li>• Sustainable transport</li> <li>• Sustainable production and consumption;</li> <li>• Public health threats;</li> <li>• Better management</li> </ul>	<ul style="list-style-type: none"> <li>• Air</li> <li>• Climate factors</li> <li>• Cultural heritage and the landscape</li> <li>• Population and human health</li> </ul>	The Neighbourhood Plans should take into account the objectives of the strategy. The aim of sustainable development should be implicit in its approach.

<sup>1</sup> Derived from the LDF General Scoping Report (June 2007)

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Plans and Programmes	Type of document	Date	Overview	Key message, target/objective/indicator	SEA topic(s) <sup>1</sup>	Implications for the NDP and SEA
				<p>of natural resources;</p> <ul style="list-style-type: none"> <li>• Social inclusion, demography and migration;</li> <li>• Fighting global poverty.</li> </ul>		
National Planning Policy Framework (NPPF)	National planning policy.	2012	Consolidates the suite of PPG/PPS into one succinct planning policy document.		<ul style="list-style-type: none"> <li>• Air</li> <li>• Biodiversity</li> <li>• Climate factors</li> <li>• Cultural heritage and the landscape</li> <li>• Flora and fauna</li> <li>• Material assets</li> <li>• Population and human health</li> <li>• Soil</li> <li>• Water</li> </ul>	The NDP should take into account the relevant policies set within the NPPF.
Planning Practice Guidance	Government Guidance	2014	Provides guidance to local planning authorities and others on the operation of the planning system.		<ul style="list-style-type: none"> <li>• Air</li> <li>• Biodiversity</li> <li>• Climate factors</li> <li>• Cultural heritage and the landscape</li> <li>• Flora and fauna</li> <li>• Material assets</li> <li>• Population and human health</li> <li>• Soil</li> <li>• Water</li> </ul>	The NDP should take into account the planning guidance provided within these documents.
Pre-submission Herefordshire	Development Plan Document	2014	Sets out the vision, objectives and policies for	Outlines the emerging suite of countywide planning policies relating to	<ul style="list-style-type: none"> <li>• Air</li> <li>• Biodiversity</li> </ul>	The NDP should take account of relevant policies set within in the

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Plans and Programmes	Type of document	Date	Overview	Key message, target/objective/indicator	SEA topic(s) <sup>1</sup>	Implications for the NDP and SEA
Core Strategy 2011-2031	(DPD)		the Herefordshire Local Plan (Core Strategy), which will guide development across the county up to 2031.	<p>housing, economic development and the environment, which the NDP will need to be in conformity with where relevant.</p> <p>The Pre-submission Core Strategy includes a range of objectives, five of which directly relate to rural areas:</p> <ul style="list-style-type: none"> <li>• To meet the housing needs of all sections of the community</li> <li>• To improve access to services in rural areas</li> <li>• To strengthen the economic viability of the villages and their rural hinterlands</li> <li>• To achieve sustainable communities and protect the environment</li> <li>• To conserve, promote, utilise and enjoy our natural, built, historic and cultural assets for the fullest benefit of the whole community</li> </ul>	<ul style="list-style-type: none"> <li>• Climate factors</li> <li>• Cultural heritage and the landscape</li> <li>• Flora and fauna</li> <li>• Material assets</li> <li>• Population and human health</li> <li>• Soil</li> <li>• Water</li> </ul>	<p>Core Strategy.</p> <p>Where necessary, the NDP should provide services, facilities and employment opportunities that are accessible to both local and neighbouring communities.</p> <p>The Core Strategy highlights that Bodenham and Bodenham Moor should accommodate 15% growth by 2031.</p> <p>This is approximately 10 dwellings in Bodenham and 40 dwellings in Bodenham Moor in accordance with the Rural Housing Background Paper March 2013.</p> <p>This is unless there is robust and sound evidence to demonstrate a more accurate existing built form figure or the existence of unavoidable constraints on site</p>

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Plans and Programmes	Type of document	Date	Overview	Key message, target/objective/indicator	SEA topic(s) <sup>1</sup>	Implications for the NDP and SEA
				<p>To achieve a thriving rural Herefordshire, the Core Strategy seeks to enhance the role the villages have traditionally played in as accessible, sustainable centres for their rural catchments.</p> <p>Seeks proportional growth of up to 15% in Bodenham and Bodenham Moor (Bromyard HMA) over the plan period.</p>		delivery.
Herefordshire Local Transport Plan 3 (LTP) 2013-2015	Corporate	2013	Sets out the Council's strategy for supporting economic growth, social inclusion and reducing the environmental impacts of transport, as well as the program of investment for the period April 2013 to April 2015.	The document includes three key objectives, one which seeks to maintain access for rural residents and people without access to a car. Intrinsic to this is the retention of a 'core network' of bus services which focus on journeys between Hereford and the market towns, along with main transport corridors close to larger rural settlements. To this end, the strategy aims to increase the number of bus users by 1.3% (4,700 journeys) by 2015.	<ul style="list-style-type: none"> <li>• Air</li> <li>• Climate factors</li> <li>• Population and human health</li> </ul>	The LTP does not explore current transport issues in the Bodenham Neighbourhood Area, but any new development proposed through the NDP should seek to reduce the environmental impacts of transport.

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Plans and Programmes	Type of document	Date	Overview	Key message, target/objective/indicator	SEA topic(s) <sup>1</sup>	Implications for the NDP and SEA
Malvern Hills AONB Management Plan 2009-2014	Corporate	2009	Identifies the issues and challenges facing the special features of the area and contains 24 guiding principles and 46 strategic objectives which will help address them.		<ul style="list-style-type: none"> <li>• Air</li> <li>• Biodiversity</li> <li>• Climate factors</li> <li>• Cultural heritage and the landscape</li> <li>• Flora and fauna</li> <li>• Material assets</li> <li>• Population and human health</li> <li>• Soil</li> <li>• Water</li> </ul>	The Bodenham Neighbourhood Area is not within or adjacent to the Malvern Hills AONB.
Wye Valley AONB management Plan 2009-2014	Corporate	2009	The Management Plan is the prime document which sets out the vision for the area and the priorities for its management.		<ul style="list-style-type: none"> <li>• Air</li> <li>• Biodiversity</li> <li>• Climate factors</li> <li>• Cultural heritage and the landscape</li> <li>• Flora and fauna</li> <li>• Material assets</li> <li>• Population and human health</li> <li>• Soil</li> <li>• Water</li> </ul>	The Bodenham Neighbourhood Area is not within or adjacent to the Wye Valley AONB.

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Plans and Programmes	Type of document	Date	Overview	Key message, target/objective/indicator	SEA topic(s) <sup>1</sup>	Implications for the NDP and SEA
Herefordshire Economic Development Strategy 2011-2016	Corporate	2011	Aims to increase the economic wealth of Herefordshire by setting out proposals and to support business growth up to 2016.	<p>The document outlines the path and direction to foster economic vitality within Herefordshire. Key objectives therefore include:</p> <ul style="list-style-type: none"> <li>• Sustaining business survival and growth</li> <li>• Increasing wage levels, range and quality of jobs</li> <li>• Having a skilled population to meet future work needs</li> <li>• Developing the county's built infrastructure so enterprise can flourish.</li> </ul>	<ul style="list-style-type: none"> <li>• Cultural heritage and the landscape</li> <li>• Material assets</li> <li>• Population and human health</li> </ul>	None of merit.

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Plans and Programmes	Type of document	Date	Overview	Key message, target/objective/indicator	SEA topic(s) <sup>1</sup>	Implications for the NDP and SEA
Herefordshire Employment Land Study	Evidence	2012	Includes employment land assessments for the plan period 2011-2031. The study includes Quantitative and Qualitative assessments of employment land, assessment of market demand and need, as well as providing forecasts and recommendations for future employment need over the plan period.	<p>This study covers existing employment sites in Hereford, the five market towns and their rural hinterlands.</p> <p>This study does not make reference to any employment sites within the neighbourhood area.</p> <p>The study does not make any recommendations in respect of employment need within the neighbourhood area.</p>	<ul style="list-style-type: none"> <li>• Material assets</li> <li>• Population and human health</li> </ul>	The NDP process may want to explore whether there is any additional employment need locally and if so whether there is any scope for providing employment land and premises.



Plans and Programmes	Type of document	Date	Overview	Key message, target/objective/indicator	SEA topic(s) <sup>1</sup>	Implications for the NDP and SEA
Herefordshire Strategic Housing Land Availability Assessment (SHLAA)	Evidence	2009	<p>The SHLAA aims to justify site allocations in plans by:</p> <ul style="list-style-type: none"> <li>Identifying sites which are capable of delivering housing development</li> <li>Assessing sites for their housing potential; and</li> <li>Predicting when a site could be developed for housing.</li> </ul>	<p>In terms of Bodenham previous SHLAA identifies that:</p> <ul style="list-style-type: none"> <li>?? sites have been considered but it indicates that these would not be achievable within the plan period due to high landscape impact.</li> </ul>	<ul style="list-style-type: none"> <li>Air</li> <li>Biodiversity</li> <li>Climate factors</li> <li>Cultural heritage and the landscape</li> <li>Flora and fauna</li> <li>Population and human health</li> <li>Soil</li> <li>Water</li> </ul>	<p>The SHLAA assesses the potential availability of land for housing in Bodenham.</p> <p>The Bodenham NDP should be informed by the findings of the SHLAA or undertake its own locally site search assessments.</p>

Plans and Programmes	Type of document	Date	Overview	Key message, target/objective/indicator	SEA topic(s) <sup>1</sup>	Implications for the NDP and SEA
Herefordshire Local Housing Market Assessment (LHMA)	Evidence	2013	Builds on an earlier Strategic Housing Market Assessment (SHMA) developed for Herefordshire and Shropshire. Its purpose is to inform the Local Plan's policies regarding housing need and demand (for market and affordable housing) within each of the 7 Housing Market Areas (HMAs) in Herefordshire between 2011 and 2031.	<p>Bodenham falls within the Bromyard HMA. Here, the study reveals that:</p> <ul style="list-style-type: none"> <li>• 57.1% of households are unable to afford market housing.</li> <li>• There is an annual requirement for 17 affordable dwellings between 2012 and 2017.</li> </ul> <p>The study identifies that, in rural parts of the HMA, there is a need for:</p> <ul style="list-style-type: none"> <li>• 219 market houses</li> <li>• 146 affordable houses.</li> </ul> <p>The study highlights that within the Bromyard HMA the overall estimated housing need by size 2012-2017 is as follows: 1 Bed - 46%, 2 bed – 30%, 3 bed – 8%, 4 bed or more -16%</p> <p>There will be a 9% increase on older persons</p>	<ul style="list-style-type: none"> <li>• Air</li> <li>• Biodiversity</li> <li>• Climate factors</li> <li>• Cultural heritage and the landscape</li> <li>• Flora and fauna</li> <li>• Population and human health</li> <li>• Soil</li> <li>• Water</li> </ul>	<p>The LHMA provides an indication of housing needs and affordability within the Bromyard HMA.</p> <p>It provides evidence that could be used to inform policies or market and affordable housing requirements in the NDP.</p> <p>Bodenham Parish Housing Needs Survey (July 2014) indicates 2 affordable units and 8 open market houses will be required in the next 3 years.</p>

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Plans and Programmes	Type of document	Date	Overview	Key message, target/objective/indicator	SEA topic(s) <sup>1</sup>	Implications for the NDP and SEA
Herefordshire Local Housing Requirements Study	Evidence	2012	Technical assessment of the housing market and potential future local housing requirements which supports planning policy regarding the amount of growth, housing tenure and housing type needed within Herefordshire up to 2031.	<p>The delivery of 5,300 homes in the rural areas would:</p> <ul style="list-style-type: none"> <li>• Support growth in the rural population by 6%</li> <li>• Increase the number of households by 14.5%</li> </ul> <p>Forecasts also predict that growth in the population of the rural areas is likely to be primarily through an increase in those aged over 75.</p> <p>Moderate growth is expected in the 30-44 and 60-74 age brackets.</p> <p>The Local Housing Requirements Study therefore anticipates continuing improvements in life expectancy; significant growth is expected of those in their 80s, with the existing population in their 40s and 50s moving into retirement. As a consequence, the rural areas will face an increasing urgency to</p>	<ul style="list-style-type: none"> <li>• Air</li> <li>• Biodiversity</li> <li>• Climate factors</li> <li>• Cultural heritage and the landscape</li> <li>• Flora and fauna</li> <li>• Material assets</li> <li>• Population and human health</li> <li>• Soil</li> <li>• Water</li> </ul>	<p>This study provides an indication of housing requirements in the rural areas and the Bromyard HMA.</p> <p>This evidence can be used to inform the content of the Bodenham NDP, which could include policies to facilitate the provision of the right types of homes in the right places.</p>

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Plans and Programmes	Type of document	Date	Overview	Key message, target/objective/indicator	SEA topic(s) <sup>1</sup>	Implications for the NDP and SEA
				provide more 3 bedroom homes, with more 1 and 2 bed homes required in the affordable sector.		
Herefordshire Rural Housing Background Report	Evidence	2013	Provides the justification for the proportional housing growth targets outlined in the Core Strategy	The villages of Bodenham and Bodenham Moor are listed as RA1 settlements, which means they are considered a sustainable location for proportional growth of up to 14%.	<ul style="list-style-type: none"> <li>• Air</li> <li>• Biodiversity</li> <li>• Climate factors</li> <li>• Cultural heritage and the landscape</li> <li>• Flora and fauna</li> <li>• Material assets</li> <li>• Population and human health</li> <li>• Soil</li> <li>• Water</li> </ul>	The Bodenham NDP will need to be in conformity with the provisions of Policy RA1.

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Plans and Programmes	Type of document	Date	Overview	Key message, target/objective/indicator	SEA topic(s) <sup>1</sup>	Implications for the NDP and SEA
Herefordshire Draft Gypsies and Travellers Assessment	Evidence	2013	Assesses the accommodation needs of Gypsies and Travellers across Herefordshire.	<p>Key findings from the survey of Gypsy and Traveller households in 2012 found that:</p> <ul style="list-style-type: none"> <li>• 31% of households surveyed have some sort of accommodation need</li> <li>• Of the 17 households with an accommodation need, 7 had a requirement for at least one additional pitch</li> <li>• 10 households had a requirement for bricks and mortar housing</li> <li>• There is an additional requirement for 7 pitches and 9 units of Registered Social Landlord accommodation within Herefordshire.</li> </ul>	<ul style="list-style-type: none"> <li>• Air</li> <li>• Biodiversity</li> <li>• Climate factors</li> <li>• Cultural heritage and the landscape</li> <li>• Flora and fauna</li> <li>• Material assets</li> <li>• Population and human health</li> <li>• Soil</li> <li>• Water</li> </ul>	<p>The Bodenham NDP must establish whether any of the need identified in this assessment falls within the neighbourhood area and make appropriate provisions for it.</p> <p>A countywide Gypsy and Traveller DPD is in the process of being produced which will cover these issues on a countywide basis (July 2014)</p>

Plans and Programmes	Type of document	Date	Overview	Key message, target/objective/indicator	SEA topic(s) <sup>1</sup>	Implications for the NDP and SEA
Building Biodiversity into the LDF	Evidence	2009	Provides the Council's Local Plan (Core Strategy) with evidence in respect of biodiversity and geodiversity, identifying both opportunities and constraints across Herefordshire.	This document provides useful information in respect of Hereford and the market towns only.	<ul style="list-style-type: none"> <li>• Air</li> <li>• Biodiversity</li> <li>• Climate factors</li> <li>• Cultural heritage and the landscape</li> <li>• Flora and fauna</li> <li>• Material assets</li> <li>• Population and human health</li> <li>• Soil</li> <li>• Water</li> </ul>	There is a serious lack of information about rural areas which means it will be necessary to gather and assess existing biodiversity and geodiversity data, in order to ensure that the Bodenham NDP can overcome any existing constraints and capitalise on opportunities to enhance habitats and their networks.
Herefordshire Green Infrastructure Strategy	Evidence	2010	Develops a framework of natural and culturally important features and functions so that planning for a sustainable future is at the heart of planning within Herefordshire.	Establishes policies and principles for the protection and enhancement of those features and functions that contributes to the environment of Herefordshire across a range of scales.	<ul style="list-style-type: none"> <li>• Air</li> <li>• Biodiversity</li> <li>• Climate factors</li> <li>• Cultural heritage and the landscape</li> <li>• Flora and fauna</li> <li>• Material assets</li> <li>• Population and human health</li> <li>• Soil</li> <li>• Water</li> </ul>	The study provides evidence that could be taken into account when preparing policies for the Bodenham NDP.

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Plans and Programmes	Type of document	Date	Overview	Key message, target/objective/indicator	SEA topic(s) <sup>1</sup>	Implications for the NDP and SEA
Renewable Energy Study	Evidence	2010	Assesses the energy demand within Herefordshire and the ability for the county to accommodate renewable and low carbon energy technologies.	<p>The total energy demand excluding transport for Herefordshire, at that point in time, was calculated as being:</p> <ul style="list-style-type: none"> <li>• Electrical: 731 GWh/yr</li> <li>• Heat: 1,810 GWh/yr</li> <li>• Total: 2,541 GWh/yr</li> </ul> <p>There is scope for all types of renewable energy production.</p>	<ul style="list-style-type: none"> <li>• Air</li> <li>• Biodiversity</li> <li>• Climate factors</li> <li>• Cultural heritage and the landscape</li> <li>• Flora and fauna</li> <li>• Material assets</li> <li>• Population and human health</li> <li>• Soil</li> <li>• Water</li> </ul>	The study provides evidence that could be taken into account when preparing policies for the Bodenham NDP.

Plans and Programmes	Type of document	Date	Overview	Key message, target/objective/indicator	SEA topic(s) <sup>1</sup>	Implications for the NDP and SEA
Herefordshire Playing Pitch Assessment	Evidence	2012	Produces a strategic framework, audit and assessment and needs analysis of outdoor sports pitches and facilities for Herefordshire. The document arises as a result of a recommendation in the Herefordshire and Worcestershire Sports Facilities Framework to develop local standards for playing fields and sports pitches throughout Herefordshire.	<p>The study updates components of the Herefordshire and Worcestershire Sports Facilities Framework 2010 such as updating population forecasts, setting local standards for synthetic turf pitches and grass playing fields within Herefordshire. It identifies any current gaps in provision, and looks forward to 2031 to assess what facilities are likely to be required by that date.</p> <p>In terms of Bodenham parish itself, the study reveals that there is:</p> <ul style="list-style-type: none"> <li>• 1.9ha playing pitch in association with St Michael's Primary</li> <li>• Bowling Club and Tennis Club</li> <li>• Golf club</li> </ul>	<ul style="list-style-type: none"> <li>• Biodiversity</li> <li>• Cultural heritage and the landscape</li> <li>• Flora and fauna</li> <li>• Material assets</li> <li>• Population and human health</li> </ul>	The study provides evidence that could be taken into account when preparing policies for the Bodenham NDP.

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Plans and Programmes	Type of document	Date	Overview	Key message, target/objective/indicator	SEA topic(s) <sup>1</sup>	Implications for the NDP and SEA
Open Spaces Study	Evidence	2006	The 2006 space audit and assessment of need is a snapshot of the quality, quantity and distribution of open space across Herefordshire.	<p>The study reveals that within the Central Herefordshire Area, there is:</p> <ul style="list-style-type: none"> <li>• Extensive over provision of parks and gardens</li> <li>• Extensive over provision of natural and semi-natural green space</li> <li>• Under provision of amenity green space and extensive under provision for outdoor sport</li> <li>• Average provision for children and young people.</li> </ul>	<ul style="list-style-type: none"> <li>• Biodiversity</li> <li>• Climate factors</li> <li>• Cultural heritage and the landscape</li> <li>• Flora and fauna</li> <li>• Material assets</li> <li>• Population and human health</li> </ul>	The open space audit and assessment of does not give a specific indication of open space shortfalls and surpluses in Bodenham Parish.

Plans and Programmes	Type of document	Date	Overview	Key message, target/objective/indicator	SEA topic(s) <sup>1</sup>	Implications for the NDP and SEA
Play Facilities Study	Evidence	2012	The Play Facilities Study 2012 updates the previous play facilities analysis under the Open Spaces Study 2006 and provides guidance and a framework for the development, delivery and continued sustainability of providing new and improved play facilities for children and young people in Herefordshire to 2031.	In terms of Bodenham the study indicates a village green play area will need any future community needs identified.	<ul style="list-style-type: none"> <li>• Biodiversity</li> <li>• Climate factors</li> <li>• Cultural heritage and the landscape</li> <li>• Flora and fauna</li> <li>• Material assets</li> <li>• Population and human health</li> </ul>	The study provides evidence that could be taken into account when preparing policies for the Bodenham NDP.
Strategic Flood Risk Assessment (SFRA) and Water Cycle Study  Herefordshire Flood Alleviation	Evidence	2009	The Strategic Flood Risk Assessment (SFRA) provides a summary of flood risk in Herefordshire to inform the location of future development.	Fluvial flooding from adjacent floodplains is prevalent for properties adjacent to the River Lugg at Bodenham. Surface water (pluvial) flooding is also an important issues in Bodenham.  Bodenham is within one of	<ul style="list-style-type: none"> <li>• Biodiversity</li> <li>• Climate factors</li> <li>• Material assets</li> <li>• Population and human health</li> <li>• Water</li> </ul>	New development proposed through the Bodenham NDP should be assessed against the capacity of local infrastructure.  Up-to-date flood risk information should be gathered from the

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Plans and Programmes	Type of document	Date	Overview	Key message, target/objective/indicator	SEA topic(s) <sup>1</sup>	Implications for the NDP and SEA
<p>Strategy Report (April 2010)</p> <p>Notes on Hydraulic Performance of Millcroft brook (Dec 2008)</p>			<p>The Water Cycle Study examines how water resources and water supply infrastructure, wastewater treatment, water quality, sewerage and flood risk could constrain growth across Herefordshire.</p>	<p>the five highest fluvial flood risk catchments (River Lugg)</p> <p>There is a requirement to reduce phosphate levels at the sewage treatment works. There is reduced headroom to accommodate housing. Specific flood management plans and policies should be considered.</p> <p>There is currently no hydraulic model available for Bodenham within the SFRA but report highlights some reference to SHLAA sites within the parish.</p> <p>Specific reports for the parish highlight ongoing maintenance attention is required and probably a need to replace the inadequate twin culverts carry the Millcroft Brook. Telemetry system has been in 2012 to warn residents of flash flooding.</p>		<p>Environment Agency, in order to ensure that any flood risks are considered when preparing the Bodenham NDP.</p>

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Plans and Programmes	Type of document	Date	Overview	Key message, target/objective/indicator	SEA topic(s) <sup>1</sup>	Implications for the NDP and SEA

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**Appendix A2 – Baseline information for Bodenham**

*N.B. This is based on countywide baseline information with some additions relevant to Bodenham (in red). Where no locally specific data is available for current status, trends and targets, only countywide data is reported. Any gaps in data may be filled following additional research.*

SA Objective <sup>1</sup>	SA Theme	Proposed indicator	Current status	Trends	Targets	Issues and constraints	Baseline (information) source
SEA Topic covered by objective: <i>Biodiversity, flora and fauna</i>							
13. Value, maintain, restore and expand county biodiversity.	Natural environment	Net change in condition of SSSIs across Herefordshire.	Up-to-date countywide information will be presented in the next AMR and which is due to be published in 2014.  2010/11: 27% of Herefordshire's SSSI land was in favourable condition.  <i>There is no locally specific data available at present.</i>	2006: 22% 2007: 22% 2008: 22% 2010: 24 %  Proportion of SSSI land that was in unfavourable condition but recovering increased between 2010 and 2012 going from 41% to 65%. Proportion in unfavourable and declining condition had also decreased from 4% to 1%.	% of SSSI land in favourable condition (Increase)  % of SSSI land in unfavourable condition but recovering (Increase)  % of SSSI land in unfavourable condition and declining (Decrease)	Herefordshire's SSSIs are in extremely poor condition relative to England as whole, where 96.1% of all SSSI land was in favourable condition in April 2014.  The proportion of SSSI in unfavourable condition but recovering is greater than England as a whole, where the figure currently stands at 58.6%.	Understanding Herefordshire: An integrated needs assessment (June 2013).

<sup>1</sup> Derived from the Draft Core Strategy Sustainability Appraisal Assessment (March 2013)

SA Objective <sup>1</sup>	SA Theme	Proposed indicator	Current status	Trends	Targets	Issues and constraints	Baseline (information) source
13. Value, maintain, restore and expand county biodiversity.	Natural environment	After use of mineral sites especially wildlife habitat creation	<i>There is no countywide or locally specific data available at present.</i>	-	No specific targets identified.	Should be monitored through AMR following the adoption of the Core Strategy, in line with SA recommendations.	-
13. Value, maintain, restore and expand county biodiversity.	Natural environment	Phosphate levels within the River Wye SAC and adjoining tributaries that receive increased phosphates from proportional growth.	Countywide data is available.  The River Lugg section of the SAC is currently exceeding the phosphate target.	N/A	Successful completion of the Nutrient Management Plan and Action Plan will provide future targets	New development within the area could lead to the water quality failing the phosphate levels and conservation objectives.	Nutrient Management Plan (2014)

SA Objective <sup>1</sup>	SA Theme	Proposed indicator	Current status	Trends	Targets	Issues and constraints	Baseline (information) source
13. Value, maintain, restore and expand county biodiversity.	Natural environment	Changes to protected habitats and impacts of species within the Herefordshire Local Biodiversity Action Plan.	<p>Up-to-date countywide information will be presented in the next AMR and which is due to be published in 2014.</p> <p>2010/11: 17 Habitat Action Plans and 14 Species Action Plans are currently in operation across Herefordshire.</p> <p><i>There is no locally specific data available at present.</i></p>	<p>There are no formal records of any unacceptable adverse impacts on habitats or protected species.</p> <p>Originally 156 Priority Species were identified for inclusion in Herefordshire's LBAP.</p> <p>Similarly Herefordshire's LBAP covered 23 habitats with Action Plans.</p>	No specific targets identified.	Herefordshire Biological Records Centre (HBRC) holds limited data on some individual sites.	Herefordshire Council AMR (2010/11)

SA Objective <sup>1</sup>	SA Theme	Proposed indicator	Current status	Trends	Targets	Issues and constraints	Baseline (information) source
13. Value, maintain, restore and expand county biodiversity.	Natural environment	Changes in the areas of designated nature conservation sites as a consequence of planning permission.	<p>Up-to-date countywide information will be presented in the next AMR and which is due to be published in 2014.</p> <p><b>Bodenham has:</b></p> <p><b>SSSI: 3</b> <b>SWS: 8</b></p> <p><b>Ancient woodlands: 8</b></p> <p><b>The River Lugg flows through the parish, this section forms part of the River Wye SAC</b></p>	As of 2012, there had been no change in the areas of designated nature conservation sites as a consequence of the planning permissions granted.	To capitalise on opportunities to enhance the areas of value to nature conservation as much as possible.	Herefordshire Biological Records Centre (HBRC) holds limited data on some individual sites.	Herefordshire Council AMR (2010/11)



SA Objective <sup>1</sup>	SA Theme	Proposed indicator	Current status	Trends	Targets	Issues and constraints	Baseline (information) source
13. Value, maintain, restore and expand county biodiversity.	Natural environment	Proportion of local sites where positive conservation management has or is being implemented.	<p><i>There is no countywide or locally specific data available at present.</i></p> <p>Negotiations are currently taking place regarding the potential Community Asset Transfer of management responsibilities for Bodenham Lake Nature reserve SWS (July 2014)</p>	-	No specific targets identified.	Should be monitored through AMR following the adoption of the Core Strategy, in line with SA recommendations.	-
SEA Topic covered by objectives: <i>Material assets</i>							
14. Use natural resources and energy more efficiently.	Resource consumption and climate change	Maintaining Herefordshire Council's County Site and Monuments Register.	<p>Countywide data would be too large to incorporate into this template.</p> <p>Whilst there is no qualitative, locally specific data available at present, there are no Scheduled Ancient Monuments in Bodenham</p>	-	No specific targets identified, but need to ensure that the register is kept up to date.	Should be monitored through AMR following the adoption of the Core Strategy, in line with SA recommendations.	Herefordshire Environmental Records Register (search April 2014).

SA Objective <sup>1</sup>	SA Theme	Proposed indicator	Current status	Trends	Targets	Issues and constraints	Baseline (information) source
			<p>Parish according to the latest version of the register.</p> <p>However, there are five scheduled ancient monument which are adjacent to the boundary of the parish, principally a possible causewayed enclosure at Hill Croft Field.</p>				
14. Use natural resources and energy more efficiently.	Resource consumption and climate change	Monitoring changes to historic landscapes.	<i>There is no countywide or locally specific data available at present.</i>	-	No specific targets identified.	Should be monitored through AMR following the adoption of the Core Strategy, in line with SA recommendations.	-
SEA Topic covered by objective: <i>Population, Biodiversity, Flora and Fauna</i>							

SA Objective <sup>1</sup>	SA Theme	Proposed indicator	Current status	Trends	Targets	Issues and constraints	Baseline (information) source
15. Value, protect, enhance and restore the landscape quality of Herefordshire, including its rural areas and open spaces.	Natural environment	Number of developments meeting and surpassing national design standards.	<i>There is no countywide or locally specific data available at present.</i>	-	No specific targets identified.	Should be monitored through AMR following the adoption of the Core Strategy, in line with SA recommendations.	-
15. Value, protect, enhance and restore the landscape quality of Herefordshire, including its rural areas and open spaces.	Natural environment	The need for, frequency and outcomes of planning enforcement investigations/ planning appeals concerning aspects of local loss of heritage assets and locally important buildings particularly within a conservation area.	Countywide data would be too large to incorporate into this template. .	No historic records of any planning enforcement action or appeals.	To wherever possible improve upon or otherwise maintain current status.	Current status must be verified by Development Management and Enforcement Officers, but the NDP can help to avoid enforcement action and appeals during the plan period.	Council Dvt Mgt records (searched April 2014)
SEA Topic covered by objective: <i>Climatic Factors</i>							

SA Objective <sup>1</sup>	SA Theme	Proposed indicator	Current status	Trends	Targets	Issues and constraints	Baseline (information) source
16. Reduce Herefordshire's vulnerability to the impacts of climate change as well as its contribution to the problem.	Resource consumption and climate change.	Transport patronage by mode	<p>% of Herefordshire residents who travel to work by:</p> <p>Car: 70.1%  Foot: 14.7%  Bicycle: 4.3%  Bus: 2%  Train: 0.8%  Motorbike: 0.8%  Taxi: 0.3%  Other: 7%</p> <p><i>There is no locally specific data available at present</i></p>	The number of people cycling or travelling by bus as the main form transport to get to work declined between 2001 and 2011 – across England and Wales there was little change in either. Walking or driving a car or van on the other hand increased.	To increase the take up of alternative modes to the private car.	There are a lack of transport options for many rural communities and therefore high car ownership and dependency – the last decade has seen a 15 per cent increase in household car ownership, although this is not reflected in traffic flows of recent years with volumes in Hereford City and wider county having decreased. The proportion of people working from home increased over the decade from 15 per cent in 2001 to 17 per cent in 2011.	2011 Census

SA Objective <sup>1</sup>	SA Theme	Proposed indicator	Current status	Trends	Targets	Issues and constraints	Baseline (information) source
16. Reduce Herefordshire's vulnerability to the impacts of climate change as well as its contribution to the problem.	Resource consumption and climate change.	Number of decentralised energy schemes granted permission.	<i>There is no countywide or locally specific data available at present.</i>	-	To contribute towards the national target.	Should be monitored through AMR following the adoption of the Core Strategy, in line with SA recommendations.	-

SA Objective <sup>1</sup>	SA Theme	Proposed indicator	Current status	Trends	Targets	Issues and constraints	Baseline (information) source
16. Reduce Herefordshire's vulnerability to the impacts of climate change as well as its contribution to the problem.	Resource consumption and climate	Total CO2 emissions per capita	<p>Latest figure dates back to 2010: 1.61 million tonnes (mtCO<sub>2</sub>)</p> <p><i>There is no locally specific data available at present.</i></p>	<p>Between 2005 and 2010 Herefordshire's total and per capita carbon emission reduced by 7% and 8% respectively; while UK's total and per capita carbon emission reduced by 8% and 12% respectively within the same period. This trend hides an increase in emissions between 2009 and 2010 when total emissions in the county increased by 5% the same as across the UK (+5%).</p>	To reduce the overall carbon emissions.	CO <sub>2</sub> emissions produced are decreasing.	Understanding Herefordshire: An integrated needs assessment (June 2013).

SA Objective <sup>1</sup>	SA Theme	Proposed indicator	Current status	Trends	Targets	Issues and constraints	Baseline (information) source
SEA Topic covered by objective: <i>Water</i>							
17. Reduce the risk of flooding and the resulting detriment to public wellbeing, the economy and the environment.	Natural environment	Number of planning permissions granted contrary to the advice of the Environment Agency on flood defence grounds.	Up-to-date countywide information does not appear within the 2011/13 AMR. Therefore data from 2010/11 has been used.  2010/11: None  <i>There is no locally specific data available at present.</i>	There have been no approvals contrary to EA advice since reporting began in 2004.	To have no applications permitted contrary to EA advice.	None identified.	Herefordshire Council AMR (2010/11)
SEA Topic covered by objective: <i>Water, air, soil, material assets</i>							
18. Minimise local and global pollution and protect or enhance environmental resources.	Natural environment	Agricultural land usage by quality	<i>There is no countywide or locally specific data available at present.</i>	-	No specific targets identified.	Should be monitored through AMR following the adoption of the Core Strategy, in line with SA recommendations.	-

SA Objective <sup>1</sup>	SA Theme	Proposed indicator	Current status	Trends	Targets	Issues and constraints	Baseline (information) source
18. Minimise local and global pollution and protect or enhance environmental resources.	Natural environment	Percentage of river length assessed as good or very good chemical quality	Latest figure dates back to 2005: 84%  <i>There is no locally specific data available at present.</i>	Figure steadily improved before going into decline:  Herefordshire 1999 85.9%, 2000 89.5%, 2001 92.2%, 2002 91.8%	To ensure that rivers meet their conservation objectives and do not fall below the required standard of quality.	None identified.	The State of Herefordshire Report (2007)
SEA Topic covered by objective: <i>Soil</i>							
19. Ensure integrated, efficient and balanced land use.	Built environment	Percentage of all new development completed on previously developed land.	2011/13: 67%  <i>There is no locally specific data available at present.</i>	Completions on PDL had risen to 71% by 2005.	To increase the number of homes built on PDL in line with the provisions of national planning policy.	The number of brownfield completions has fallen slightly in recent years, though this is probably the offshoot of tough market conditions.	Herefordshire Council AMR (2011/13)
19. Ensure integrated, efficient and balanced land use.	Built environment	Housing densities in urban and rural areas	<i>There is no countywide or locally specific data available at present.</i>	-	No specific targets identified.	Should be monitored through AMR following the adoption of the Core Strategy, in line with SA recommendations.	-



SA Objective <sup>1</sup>	SA Theme	Proposed indicator	Current status	Trends	Targets	Issues and constraints	Baseline (information) source
19. Ensure integrated, efficient and balanced land use.	Built environment	Level of development in urban areas compared to rural.	<p><i>There is no countywide or locally specific data available at present.</i></p> <p>This indicator would not be applicable to rural NDPs.</p>	N/A	N/A	N/A	N/A
SEA Topic covered by objective: <i>Cultural heritage</i>							
20. Value, protect and enhance the character and built quality of settlements and neighbourhoods and the county's heritage assets, including conservation areas, historic environment and cultural heritage.	Built environment	Number and percentage of listed buildings and Scheduled Ancient Monuments on Buildings at Risk Register (English Heritage).	<p>Up-to-date countywide information will be presented in the next AMR and which is due to be published in 2014. However, this data would be too large to incorporate into this template.</p> <p><b>There are numerous listed buildings within the parish. None are currently recorded in the Buildings at Risk Register.</b></p>	There were 58 heritage assets in Herefordshire that were considered to be at high risk and included in the Heritage at Risk Register 2011.	To wherever possible improve upon or otherwise maintain current status.	<b>None of Bodenham's listed buildings are considered to be at risk at present.</b>	Buildings at Risk Register (English Heritage; search July 2014)

SA Objective <sup>1</sup>	SA Theme	Proposed indicator	Current status	Trends	Targets	Issues and constraints	Baseline (information) source
20. Value, protect and enhance the character and built quality of settlements and neighbourhoods and the county's heritage assets, including conservation areas, historic environment and cultural heritage.	Built environment	The need for, frequency and outcomes of planning enforcement investigations/ planning appeals concerning aspects of local loss of heritage assets, locally important buildings within the parish and particularly within a conservation area.	<p>Countywide data would be too large to incorporate into this template.</p> <p>There are no outstanding enforcement actions or appeals concerning local loss of heritage assets locally important buildings particularly within the conservation area within Bodenham.</p> <p>There is an outstanding enforcement on a listed building outside of the conservation area.</p>	No historic records of any planning enforcement action or appeals concerning locally important buildings within Bodenham Conservation area.	To wherever possible improve upon or otherwise maintain current status.	Current status must be verified by Development Management and Enforcement Officers, but the NDP can help to avoid enforcement action and appeals during the plan period.	Council Dvt Mgt records (searched July 2014)

**Appendix A3** – Environmental issues identified from the Bodenham Neighbourhood Plan baseline

These environmental issues are the same as most of those identified for the Herefordshire Core Strategy<sup>1</sup>

SEA Topic		Environmental issue	SA objectives
1	Air	High reliance upon the private car causing high levels of air pollution and in Hereford in particular	Objective 16
		Need to reduce carbon emissions by encouraging alternative modes of travel.	
2	Biodiversity	Habitats and species of national, regional and local importance are under pressure from the adaptation and diversification of farming and forestry employment.	Objectives 13 & 15
		Minimise loss of biodiversity and expand opportunities for wildlife everywhere.	
3	Climatic factors	Reduce greenhouse gas emissions through planning, design and build.	Objective 16
4	Cultural heritage	Bodenham has numerous Scheduled Ancient Monuments and listed buildings, all of which require ongoing protection and many in need of high levels of maintenance.	Objective 20
5	Flora and fauna	Conserve and enhance the character and quality of historic landscapes, including all types of natural flora and fauna.	Objective 15
6	Material assets	How the countryside can continue to be managed in an economically, socially and environmentally beneficial way in the face of continuing pressures on traditional farming.	Objectives 14 & 18
7	Population	Minimise energy waste through good designs, which help to reduce energy consumption and maximise efficiency.	Objective 15
		Need to avoid enforcement investigations/action concerning locally important buildings and those within conservation areas in particular.	
8	Soil	Promoting development of previously developed land and buildings as opposed to greenfield sites or agricultural land of the highest quality.	Objectives 18 & 19
9	Water	Issues relating to availability of resources, foul drainage, pollution, and abstraction in a county which supports water dependent biodiversity of international and national importance, given the predicted climate change consequences for water availability and demanding projections for new housing.	Objectives 17 & 18
		Steady decline in the chemical quality of rivers over the last 10 years.	

<sup>1</sup> Derived from the Pre-submission Core Strategy Sustainability Appraisal Assessment (May 2014) and LDF General Scoping Report (June 2007)

## Appendix A4: SEA Framework

### SEA Scoping Stage A, Task A4 - SEA Framework SEA Objectives, Indicators, Targets

**Parish Council Name:** Bodenham

**Neighbourhood Development Plan Name:** Bodenham Neighbourhood Plan

**Date completed:** September 2014

<b>SEA Topics</b>	<b>SEA Objective</b> (These objectives are strategic overall SEA objectives, which you may need to refine, based on your local evidence, to make them locally relevant)	<b>Sub-objectives / Appraisal Questions (Will the option/proposal/site...)</b> (These sub-objectives are strategic overall SEA sub-objectives, which you may need to refine, based on your local evidence, to make them locally relevant)	<b>Indicators</b> (Insert indicators, based on evidence, to test and monitor whether your NDP proposals and policies are working. These should relate to the sub-objectives and be taken from Template A2)	<b>Targets</b> (Insert targets, based on evidence, to monitor whether the NDP proposals and policies are working. These should relate to the sub-objectives indicators and be taken from Template A2)
Nature Conservation (Biodiversity, flora and fauna)	To maintain and enhance nature conservation (biodiversity, flora and fauna)	<ul style="list-style-type: none"> <li>• Conserve and enhance natural / semi-natural habitats</li> <li>• Conserve and enhance species diversity</li> <li>• Avoid harm to protected species</li> <li>• Avoid damage to wildlife and geological sites designated for their conservation interest</li> <li>• Maintain and enhance woodland cover and management</li> <li>• Maintain biodiversity, avoiding irreversible losses</li> <li>• Restore the full range of characteristic habitats and species to viable levels</li> <li>• Reverse the long term decline in farmland birds</li> <li>• Ensure the sustainable management of key wildlife sites and the ecological processes on which they depend</li> <li>• Provide opportunities for people to come into contact with and appreciate wildlife and wild place</li> </ul>	<p>Net change in condition of SSSIs across Herefordshire.</p> <p>After use of mineral sites especially wildlife habitat creation</p> <p>Changes to protected habitats and impacts of species within the Herefordshire Local Biodiversity Action Plan.</p>	<p>% of SSSI land in favourable condition (Increase)</p> <p>% of SSSI land in unfavourable condition but recovering (Increase)</p> <p>% of SSSI land in unfavourable condition and declining (Decrease)</p> <p>No specific targets identified.</p> <p>No specific targets identified.</p>

<b>SEA Topics</b>	<b>SEA Objective</b> (These objectives are strategic overall SEA objectives, which you may need to refine, based on your local evidence, to make them locally relevant)	<b>Sub-objectives / Appraisal Questions (Will the option/proposal/site...)</b> (These sub-objectives are strategic overall SEA sub-objectives, which you may need to refine, based on your local evidence, to make them locally relevant)	<b>Indicators</b> (Insert indicators, based on evidence, to test and monitor whether your NDP proposals and policies are working. These should relate to the sub-objectives and be taken from Template A2)	<b>Targets</b> (Insert targets, based on evidence, to monitor whether the NDP proposals and policies are working. These should relate to the sub-objectives indicators and be taken from Template A2)
Landscape	<p>To maintain and enhance the quality of landscapes and townscapes</p> <p>To improve quality of surroundings</p>	<ul style="list-style-type: none"> <li>• Protect and enhance the landscape everywhere and particularly in designated areas</li> <li>• Value and protect diversity and local distinctiveness</li> <li>• Improve landscape and ecological quality and character of the countryside</li> <li>• Improve the quantity and quality of publicly accessible open space</li> <li>• Improve satisfaction of people with their neighbourhoods as places to live</li> <li>• Decrease litter and graffiti in towns and countryside</li> <li>• Result in the loss of open space</li> </ul>	<p>Changes in the areas of designated nature conservation sites as a consequence of planning permission.</p> <p>Proportion of local sites where positive conservation management has or is being implemented.</p> <p>Monitoring changes to historic landscapes.</p> <p>Area resulting in a loss of open space as a result of planning permission</p>	<p>To capitalise on opportunities to enhance the areas of value to nature conservation as much as possible.</p> <p>No specific targets identified.</p> <p>No specific targets identified.</p> <p>No specific targets identified</p>
Heritage	<p>To conserve and where appropriate enhance the historic environment , heritage assets and culture heritage</p>	<ul style="list-style-type: none"> <li>• Preserve, protect and enhance heritage assets including conservation areas, historic buildings, archaeological sites and other culturally important features in both urban and rural settings.</li> <li>• Create places, spaces and buildings that work well, wear well and look well</li> </ul>	<p>The need for, frequency and outcomes of planning enforcement investigations/ planning appeals concerning aspects of local loss of locally important buildings within a conservation area.</p> <p>Number and percentage of listed buildings and Scheduled Ancient Monuments on Buildings at Risk Register (English Heritage).</p> <p>Ensure that Herefordshire Council's Sites and Monuments Register is kept up to date.</p>	<p>To improve upon or otherwise maintain current status.</p> <p>To improve upon or otherwise maintain current status.</p> <p>No specific targets identified, but need to ensure that the register is kept up to date.</p>

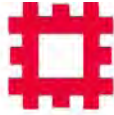
<b>SEA Topics</b>	<b>SEA Objective</b> (These objectives are strategic overall SEA objectives, which you may need to refine, based on your local evidence, to make them locally relevant)	<b>Sub-objectives / Appraisal Questions (Will the option/proposal/site...)</b> (These sub-objectives are strategic overall SEA sub-objectives, which you may need to refine, based on your local evidence, to make them locally relevant)	<b>Indicators</b> ( <i>Insert indicators, based on evidence, to test and monitor whether your NDP proposals and policies are working. These should relate to the sub-objectives and be taken from Template A2</i> )	<b>Targets</b> ( <i>Insert targets, based on evidence, to monitor whether the NDP proposals and policies are working. These should relate to the sub-objectives indicators and be taken from Template A2</i> )
Air and Climate	<p>To improve air quality</p> <p>To reduce the effect of traffic on the environment</p> <p>To reduce contributions to climate change</p> <p>To reduce vulnerability to climate change</p>	<ul style="list-style-type: none"> <li>• Limit air pollution, including greenhouse gas emissions and ozone depleting substances</li> <li>• Improve air quality</li> <li>• Reduce the need to travel</li> <li>• Reduce traffic volumes and congestion</li> <li>• Reduce road traffic accidents</li> <li>• Reduce commuting and improve accessibility by public transport walking and cycling</li> <li>• Increase proportion of journeys using modes other than the car</li> <li>• Reduce the effects of heavy goods traffic (freight) on people and the environment</li> <li>• Reduce respiratory illnesses</li> <li>• Reduce energy consumption and improve energy efficiency</li> <li>• Increase proportion of energy needs being met from renewable sources</li> <li>• Reduce vulnerability to the effects of climate change e.g. flooding, disruption to travel by extreme weather</li> </ul>	<p>Transport patronage by mode</p> <p>Number of decentralised energy schemes granted permission.</p> <p>Total CO2 emissions per capita</p>	<p>To encourage the take up of lesser polluting form of transport</p> <p>To contribute towards the national target.</p> <p>To reduce the overall carbon emissions.</p>

<b>SEA Topics</b>	<b>SEA Objective</b> (These objectives are strategic overall SEA objectives, which you may need to refine, based on your local evidence, to make them locally relevant)	<b>Sub-objectives / Appraisal Questions (Will the option/proposal/site...)</b> (These sub-objectives are strategic overall SEA sub-objectives, which you may need to refine, based on your local evidence, to make them locally relevant)	<b>Indicators</b> (Insert indicators, based on evidence, to test and monitor whether your NDP proposals and policies are working. These should relate to the sub-objectives and be taken from Template A2)	<b>Targets</b> (Insert targets, based on evidence, to monitor whether the NDP proposals and policies are working. These should relate to the sub-objectives indicators and be taken from Template A2)
Water	<p>To improve water quality</p> <p>To provide for sustainable sources of water supply</p> <p>To avoid, reduce and manage flood risk</p>	<ul style="list-style-type: none"> <li>• Improve the quality of inland water: rivers, lakes and ponds</li> <li>• Limit water pollution</li> <li>• Maintain water abstraction, run-off and recharge within carrying capacity (including future capacity)</li> <li>• Reduce water consumption and improve water efficiency</li> <li>• Minimise the risk of flooding from rivers and watercourses to people and property</li> <li>• Minimise risk of subsidence</li> <li>• Reduce risk of damage to property from storm events</li> </ul>	<p>Number of planning permissions granted contrary to the advice of the Environment Agency on flood defence grounds.</p> <p>Percentage of river length assessed as good or very good chemical quality and ecological quality</p> <p>Phosphate levels within the River Wye SAC and adjoining tributaries that receive increased phosphates from proportional growth.</p>	<p>To have no applications permitted contrary to EA advice.</p> <p>To ensure that rivers meet their conservation objectives and do not fall below the required standard of quality as set out in the Water Framework Directive.</p> <p>To meet the targets set out in the Nutrient Management Plan (2014)</p>
Soil	<p>To conserve soil resources and quality</p> <p>Ensure integrated, efficient and balanced land use.</p>	<ul style="list-style-type: none"> <li>• Reduce contamination, and safeguard soil quality and quantity</li> <li>• Minimise loss of greenfield land / maximise development on brownfield land</li> <li>• Reduce the amount of derelict and underused land</li> <li>• Minimise waste generation and increase re-use or recovery through recycling, composting or energy recovery</li> <li>• Maximise the amount of waste diverted from landfill through recovery and recycling</li> <li>• Reduce household waste going to landfill</li> <li>• Reduce hazardous waste</li> <li>• Reduce waste in the construction of developments</li> </ul>	<p>Percentage of all new development completed on previously developed land.</p> <p>Amount of land identified as best and most versatile agricultural land lost to development.</p>	<p>To increase the number of homes built on PDL in line with the provisions of national planning policy.</p> <p>No specific targets identified.</p>

<b>SEA Topics</b>	<b>SEA Objective</b> (These objectives are strategic overall SEA objectives, which you may need to refine, based on your local evidence, to make them locally relevant)	<b>Sub-objectives / Appraisal Questions (Will the option/proposal/site...)</b> (These sub-objectives are strategic overall SEA sub-objectives, which you may need to refine, based on your local evidence, to make them locally relevant)	<b>Indicators</b> ( <i>Insert indicators, based on evidence, to test and monitor whether your NDP proposals and policies are working. These should relate to the sub-objectives and be taken from Template A2</i> )	<b>Targets</b> ( <i>Insert targets, based on evidence, to monitor whether the NDP proposals and policies are working. These should relate to the sub-objectives indicators and be taken from Template A2</i> )
Population and Human Health	To improve health of the population  To reduce crime and nuisance	<ul style="list-style-type: none"> <li>• Create conditions to improve health and reduce health inequalities in those areas most affected</li> <li>• Promote healthy living and lifestyles</li> <li>• Reduce death rates</li> <li>• Protect and enhance human health</li> <li>• Reduce and prevent crime, reduce fear of crime</li> <li>• Decrease noise and vibration</li> <li>• Increase opportunities for indoor recreation and exercise</li> </ul>	Number of developments meeting and surpassing national design standards.	No specific targets identified.
Material Assets	To conserve natural and manmade resources	<ul style="list-style-type: none"> <li>• Protect built assets, property, infrastructure and services</li> <li>• Increase proportion of building materials from sustainable sources</li> <li>• Promote the development of a sustainable settlement pattern and physical infrastructure</li> <li>• Promote the efficient use of land and resources</li> <li>• Reduce consumption of materials and resources</li> </ul>	<p>Agricultural land usage by quality</p> <p>Housing densities in urban and rural areas</p> <p>Level of development in urban areas compared to rural.</p>	<p>No specific targets identified.</p> <p>No specific targets identified.</p> <p>N/A</p>



# Appendix 3



ENGLISH HERITAGE

WEST MIDLANDS REGION

Neighbourhood Planning Team  
Herefordshire Council  
Planning Services  
PO Box 230  
Blueschool House  
Blueschool Street  
Hereford  
HR1 2ZB.

Our ref:  
Your ref:

Telephone 0121 625 6887  
Fax 0121 625 6820

27 October 2014

Dear Sir or Madam

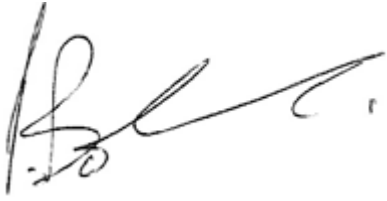
**CONSULTATION ON SEA SCOPING REPORTS FOR NEIGHBOURHOOD PLANS IN: Abbeydore & Bacton, Ewyas Harold Group & Kentchurch; Bodenham; Colwall; Cusop; Dinedor; Llangarron; Lower Bullingham; Much Marcle; Ross on Wye and Ross Rural.**

Thank you for your e-mails and the invitation to comment on the SEA Scoping Reports for the Neighbourhood Plans listed above. We have no substantive objection to the contents of the documents. However, having considered the above Neighbourhood Plans please note that overall our comments and recommendations to you in relation to these remain substantively the same as those which we communicated to you in our letter of the 15<sup>th</sup> August 2014 in response to the first tranche of SEA Scoping Reports. We urge you to refer back to and consider these representations before finalizing the reports in relation to the above Neighbourhood Plans also.

Specifically in relation to the fifth tranche of consultations we note that all of the SEA Scoping Reports appear to have anomalous references to SAM's, the Herefordshire SMR, monitoring changes to historic landscapes and historic landscape character assessments in relation to SA Objective 14 "Use natural resources and energy more effectively". Presumably this is unintentional? Is there some confusion as between the Herefordshire Sites and Monuments Register and the Herefordshire Environmental Records Register? Would these elements in fact be more relevant under SA Objectives 15 and 20?

I hope this is helpful.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Pete Boland', with a stylized flourish extending to the right.

Pete Boland

Historic Places Adviser

E-mail: [peter.boland@english-heritage.org.uk](mailto:peter.boland@english-heritage.org.uk)

Date: 21 November 2014  
Our ref: Various  
Your ref: Neighbourhood Area SEA Scoping



Mr J. Latham  
Technical Support Officer  
Neighbourhood Planning, Strategic Planning & Conservation teams  
Herefordshire Council  
Planning Services,  
Blueschool House,  
Blueschool Street  
Hereford,  
HR1 2ZB

Customer Services  
Hornbeam House  
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Crewe  
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T 0300 060 3900

## BY EMAIL ONLY

Dear Mr Latham

### Neighbourhood Plan Strategic Environmental Assessment Scoping and Habitat Regulations Assessment Screening for:

**Abbeydore and Bacton, Ewyas Harold Group and Kentchurch (NE ref:133596)**  
**Bodenham (NE Ref:133598)**  
**Colwall (NE Ref: 133599)**  
**Cusop (NE Ref: 133600)**  
**Dinedor (NE Ref:133602)**  
**Llangarron (NE Ref: 133603)**  
**Lower Bullingham (NE Ref:133604)**  
**Much Marcle (NE Ref:133605)**  
**Ross on Wye & Ross Rural (NE Ref:133606)**

Thank you for your consultation on the above dated and received by Natural England on 03 October 2014.

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.

We welcome the production of this SEA Scoping report. With respect to the natural environment Natural England wishes to make the following comments which are intended to further improve the SEA and its usefulness in assessing the Neighbourhood Plan.

### Appendix A1 – Plans, policies and programmes

In addition to the plans, policies and programmes listed, we suggest that the following are relevant and should be added:

All

- [Natural Environment White Paper](#)
- [Biodiversity 2020](#)



## Bodenham

### Colwall

### Cusop

- The EC Conservation of Habitats and Species Regulations
- The EC Water Framework Directive
- The Wildlife and Countryside Act (1981)
- The Countryside and Right of Ways Act (2000)
- The Natural Environment and Rural Communities Act (2006)
- Understanding Herefordshire Report
- Herefordshire Local Biodiversity Action Plan

## Dinedor

### Lower Bullingham

### Much Marcle

- Wye Valley AONB Management Plan 2009-2014

We also note the following:

## Abbeydore and Bacton, Ewyas Harold Group and Kentchurch

### Bodenham

### Llangarron

- The date for Herefordshire Core Strategy, Presubmission document 2011-2031, is 2013. The presubmission document has been updated since.

## Bodenham,

- In the key messages, target/ objective/indicator of Herefordshire Strategic Housing Land Availability Assessment (SHLAA) it needs to be clearer how many sites are affected rather than stating ??.

## **Appendix A2 – Baseline information**

### ***Biodiversity, flora and fauna***

## Abbeydore and Bacton, Ewyas Harold Group and Kentchurch

Under 13. Value, maintain, restore and expand county biodiversity- Net change in condition of SSSIs across Herefordshire, it states that Wormbridge Common SSSI and Chanstone Wood SSSI are within the Abbeydore and Bacton but they are not within these parish boundaries though they are within 1km of the Neighbourhood plan area.

## Bodenham

### Colwall

### Cusop

### Llangarron

### Lower Bullingham

### Ross on Wye and Ross Rural

Under the proposed indicator “*Changes to protected habitats and impacts of species within the Herefordshire Local Biodiversity Action Plan*”, we advise an additional baseline information source - Maps of priority habitats and species are available on *Magic*, Defra’s GIS package for environmental assets ([www.natureonthemap.naturalengland.org.uk](http://www.natureonthemap.naturalengland.org.uk)).

### Lower Bullingham

### Lower Marcle

### Ross on Wye and Ross Rural

Baseline information on the proposed indicator Changes to Protected habitats and impacts of species within the Herefordshire Local Biodiversity Action Plan needs to be included and we advise you could refer to the Herefordshire Council AMR (2010/11).

### All

Baseline information on the landscape and open spaces needs to be included under SA objective 15: “Value, protect, enhance and restore the landscape quality of Herefordshire, including its rural areas and open spaces”. We would welcome a reference to the Historic Landscape Characterisation for Hereford and also reference could also be made to the county Landscape Character Assessment.

## **Water, air, soil and material assets**

### All

This section (or suitable alternative) should include information on geodiversity. The baseline and assessment should make reference to geological conservation and the need to conserve, interpret and manage geological sites and features, both in the wider environment and in relation to designated features. The Herefordshire & Worcestershire Earth Heritage Trust may be of assistance.

### Dinedor

### Llangarron

### Lower Bullingham

In topic “Water, air, soil, material assets”- 18. Minimise local and global pollution and protect or enhance environmental resources, a distinction should be made between soil Grade 3a and 3b. The best and most versatile land is defined as Grades 1, 2 and 3a by policy guidance (see Annex 2 of NPPF).

## **Soil**

### All

We note that the best and most versatile agricultural land has not been considered. We suggest including an indicator to monitor the hectares of the best and most versatile agricultural land lost to development.

To assist in understanding agricultural land quality within the plan area and to safeguard ‘best and most versatile’ agricultural land in line with paragraph 112 of the National Planning Policy Framework, strategic scale Agricultural Land Classification (ALC) Maps are available. Natural England also has an archive of more detailed ALC surveys for selected locations. Both these types of data can be supplied digitally free of charge by contacting Natural England. Some of this data is also available on the [www.magic.gov.uk](http://www.magic.gov.uk) website. The planning authority should ensure that sufficient site specific ALC survey data is available to inform decision making.

## **Appendix A3 – Environmental issues identified from the baseline**

### All

Natural England welcomes the environmental issues identified.

## **Appendix A4 – SEA Framework**

### All

Under the SEA topic “ Nature Conservation” we would welcome the inclusion of an indicator/target around the impact/benefit to ecological networks (NPPF paragraph 109, 113 and 117). We note that no targets have been identified against the indicator “After use of mineral sites especially wildlife

*habitat creation*”; we suggest that perhaps the percentage of opportunities taken could be monitored.

Under SEA topic “*material assets*”, there are no targets identified against the indicator “*monitoring changes to the historic landscape*”. We suggest that the LPA could utilise Historic Landscape Characterisation studies and monitor the number of applications permitted despite a significant impact on the landscape having been identified.

Dinedor

Lower Bullingham

Ross on Wye and Ross Rural

Under the SEA topic “*Nature Conservation*” we would welcome the inclusion of sub objective “*value, enhance and protect natural environmental assets including AONB’s, historic landscapes, open spaces, parks and gardens and their settings*” but note that no indicators or targets have been identified.

Abbeydore & Bacton, Ewyas Harold Group & Kentchurch

Bodenham

Colwall

Cusop

Under the SEA topic “*Landscape*” reference could be made to the county Landscape Character Assessment and Landscape Characterisation studies including Historic Landscape Characterisation if this has been carried out.

### **Habitats Regulations Assessment Screening**

We would remind you of one of the basic conditions that a draft neighbourhood plan or Order must met, as set out in the Neighbourhood Planning Regulations 2012, which states that ‘The making of the neighbourhood development plan is not likely to have a significant effect on a European site’.

Abbeydore and Bacton, Ewyas Harold Group and Kentchurch

Colwall

We welcome this initial assessment and agree that a full Habitat Regulations Assessment Screening is not required.

Bodenham

Cusop

Dinedor

Lower Bullingham

We welcome this initial assessment and agree that a full screening exercise will be required to assess the impacts on the River Wye Special Area of Conservation (SAC).

Llangorran

We welcome this initial assessment and agree that a full screening exercise will be required to assess the impacts on the River Wye SAC and Wye Valleys Woodlands SAC

Much Marcle

We welcome this initial assessment and agree that a full screening exercise will be required to assess the impacts on the Wye Valley & Forest of Dean Bat Sites SAC).

Ross on Wye and Ross Rural

We welcome this initial assessment and agree that a full screening exercise will be required to assess the impacts on the River Wye SAC, Wye Valley & Forest of Dean Bat Sites SAC and Wye Valleys Woodlands 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 Gillian Driver on 0300 060 4335. For any new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto: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

*Gillian Driver*

Miss Gillian Driver  
Planning Adviser  
South Mercia Team



# Appendix 4

Objectives verses SEA Objectives (SMART and Compatibility Test)			
<b>SEA Stage B1</b>	<b>Key:</b>	<b>SMART criteria:</b>	
+ =/++	Compatible/ Very comp	<b>S – Specific:</b>	NDP objectives should specify what is intended to be done in detail and should not be open to a wide range of misinterpretations
- =	Possible conflict	<b>M – Measurable:</b>	It should be possible to monitor NDP objectives in a quantifiable way, by the use of indicators. Indicators should be measurable with limited resource implications.
0 =	Neutral	<b>A – Attainable/achievable:</b>	NDP objectives should be achievable and deliverable, related to the scale of growth proposed
X =	No relationship between objectives	<b>R – Realistic:</b>	NDP objectives should relate to the overall vision of the plan. Likewise, chosen indicators should relate to objectives and their outcomes.
? =	Unclear, more information needed	<b>T – Time-Bound:</b>	Objectives should be specific to the NDP period or another specified time-frame. Objectives should be associated with a target and indicators should specify when the target should be achieved.

The following matrix appraises the emerging Bodenham NDP Objectives in terms of their SMART criteria and their compatibility with the SEA Objectives. These have been developed from Government guidance on SEA and from the local evidence base gathered for identifying the NDP issues.

**SEA Objectives**

- 1- To maintain and enhance nature conservation (biodiversity, flora and fauna)
- 2- To maintain and enhance the quality of landscapes and townscapes
- 3- To improve quality of surroundings
- 4- To conserve and where appropriate enhance the historic environment and culture heritage
- 5- To improve air quality
- 6- To reduce the effect of traffic on the environment
- 7- To reduce contributions to climate change
- 8- To reduce vulnerability to climate change
- 9- To improve water quality
- 10- To provide for sustainable sources of water supply
- 11- To avoid, reduce and manage flood risk
- 12- To conserve soil resources and quality
- 13- To minimise the production of waste
- 14- To improve health of the population
- 15- To reduce crime and nuisance
- 16- To conserve natural and manmade resources

NDP objectives	SEA Objectives																Conclusions	Recommendations	SMART Test of NDP objective	After SMART objectives
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16				
Objective 1 Housing Requirements	?	?	?	?	+	o	?	?	?	+	?	o				?	At this stage more information is required to assess the compatibility with the SEA objectives. This will emerge as the policies are assessed. However, this has the ability to be compatible and is in conformity with the Core Strategy.	SEA objectives should be taken into account during the formulation of the policies for growth.	This objective is specific and can be monitored via indicators within the Annual Monitoring Report. The Bodenham Neighbourhood Plan also indicates that a review period in 2021. This objective is achievable and deliverable and aims to meet the overall vision for the area. It is considered that this objective meets the SMART criteria.	No changes recommended
Objective 2 Settlement boundary	?	+	+	?	+	o	?	?	?	+	?	+				+	More detail is required regarding the locations of any development but this will emerge as following policies are assessed	No recommendations	This objective is specific and can be measures. This is also time specific. The monitoring of this policy is included within the NDP delivery plan.	No changes recommended
Objective 3 Settlement boundary 2	+	+	+	+	+	+	+	+	+	+	+	+				+	The objective is compatible with the SEA objectives	No recommendations	This objective is achievable and deliverable via the supportive policies of both the Core Strategy and the Neighbourhood Plan.	No changes recommended
Objective 4 Criteria for new housing	+	+	+	+	+	+	+	+	+	+	?	+				+	This objective is compatible with the SEA objectives	No recommendations	The objective is compatible with Core Strategy H2. The delivery plan indicated the objective will be measured and it is time specific within the plan period	No changes recommended.
Objective 5 Jobs	x	+	+	+	+	+	x	x	x	x	x	x				x	This objective is compatible with the SEA objectives	No recommendations	The impact of the plan could be measured via the Census in 2021. A period of monitoring and review has been indicated in 2021. The objective is time specific to the plan period.	No changes recommended
Objective 6 Jobs 2	+	+	+	+	?	o	?	?	?	+	?	+				+	More detail is required regarding the locations of any development but this will emerge as following policies	No recommendation	This objective can be measured via the Annual Monitoring Report. It is time specific to the plan period and monitoring has been indicated for 2021.	No changes recommended

																	are assessed			
Objective 7 Local services	x	+	+	x	+	+	+	x	?	x	+	+				+	The objective is compatible with the SEA objectives	No recommendations	This objective is achievable and deliverable via the supportive policies of both the Core Strategy and the Neighbourhood Plan.	No changes recommended
Objective 8 Local services 2	?	+	+	?	+	+	x	+	+	+	++	+				+	The objective is compatible with the SEA objectives	No recommendations	This objective is achievable and deliverable via the supportive policies of both the Core Strategy and the Neighbourhood Plan. Monitoring can take place with the aid of the Bodenham Flood Protection Group	No changes recommended
Objective 9 Local Services 3	x	+	+	+	+	+	x	x	x	x	+	x				+	The objective is compatible with the SEA objectives	No recommendations	This objective is achievable and deliverable via the supportive policies of both the Core Strategy and the Neighbourhood Plan.	No changes recommended
Objective 10 Open spaces and the environment	+	+	+	+	+	x	+	+	+	+	+	+				+	The objective is compatible with the SEA objectives	No recommendations	This objective is achievable and deliverable via the supportive policies of both the Core Strategy and the Neighbourhood Plan.	No changes recommended
Objective 11 Open spaces and the environment 2	+	+	+	+	+	+	+	+	+	+	+	+				+	The objective is compatible with the SEA objectives	No recommendations	This objective is achievable and deliverable via the supportive policies of both the Core Strategy and the Neighbourhood Plan.	No changes recommended
Objective 12 Renewable energy	?	+	+	+	+	x	+	?	?	+	?	+				+	More detail is requires regarding the locations of any development but this will emerge as following policies are assessed	No recommendation	More detail is requires regarding the locations of any development but this will emerge as following policies are assessed	No changes recommended

Objectives verses SEA Objectives (SMART and Compatibility Test)				
SEA Stage B1	<b>Key:</b>	<b>SMART criteria:</b>		
+ =/++	Compatible/very comp	<b>S – Specific:</b>	NDP objectives should specify what is intended to be done in detail and should not be open to a wide range of misinterpretations	
- =	Possible conflict	<b>M – Measurable:</b>	It should be possible to monitor NDP objectives in a quantifiable way, by the use of indicators. Indicators should be measurable with limited resource implications.	
0 =	Neutral	<b>A – Attainable/achievable:</b>	NDP objectives should be achievable and deliverable, related to the scale of growth proposed	
X =	No relationship between objectives	<b>R – Realistic:</b>	NDP objectives should relate to the overall vision of the plan. Likewise, chosen indicators should relate to objectives and their outcomes.	
? =	Unclear, more information needed	<b>T – Time-Bound:</b>	Objectives should be specific to the NDP period or another specified time-frame. Objectives should be associated with a target and indicators should specify when the target should be achieved.	

The following matrix appraises the emerging Bodenham NDP Objectives in terms of their SMART criteria and their compatibility with the SEA Objectives. These have been developed from Government guidance on SEA and from the local evidence base gathered for identifying the NDP issues.

NDP Policies	SEA objectives																Summary in relation to baseline	Overall commentary and any initial cumulative effects/ Recommendations	Conformity with Core Strategy
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16			
<b>Baseline</b>	1	2	3	4	5	6	7	8	9	10	11	12	NA	NA	NA	13			
<b>BNDP1: Delivering new housing</b>	?	?	?	?	?	?	?	?	?	?	?	?				?	At this stage, the location of development is unknown, therefore additional policy information is required in other plan policies to assessment the fully effects on the baseline.	This policy currently has an unknown effect on the baseline, however development is focussed toward the most sustainable locations at indicated within the Core Strategy. At this stage there will be some unknown elements as this this locational dependent. Other policies of the plan will provide greater detail.	This policy would meet the Core Strategy requirements in terms of the SEA.
<b>BNDP2: Settlement boundaries</b>	+	+	+	+	+	+	+	+	?	+	+	+				+	Overall the policy is compatible and has a positive impact on the baseline data	The policy is seeking to encourage future development to take place in sustainable locations by the introduction of two settlement boundaries. Criteria exists to safeguard the character of the area, important assets, and open spaces, areas of flooding and highway safety.  Additional reference to biodiversity assets would strengthen the policy further with particularly reference to the River Wye SAC and its catchment.	This policy would meet the Core Strategy requirements in terms of the SEA
<b>BNDP3: Mix, type and tenure of new housing development</b>	?	+	+	+	+	+	+	?	?	+	+	+				+	Overall the policy is compatible and has a positive impact on the baseline data	This policy reflects the provision of the Core Strategy and will only lead to very small scale development outside the settlement boundary where the criteria of H2 are met.	This policy would meet the Core Strategy requirements in terms of the SEA
<b>BNDP 4: Flooding risk and drainage</b>	++	+	+	x	x	x	++	++	+	+	++	+				+	Where relevant this policy is compatible and has a positive impact on the baseline data	This policy would not lead to development but it a criteria which is seeking to provide sufficient safeguards against flooding in an area known for existing flooding issues. The policy also will have a positive effect on the natural environment and	This policy would meet the Core Strategy requirements in terms of the SEA



Objectives verses SEA Objectives (SMART and Compatibility Test)				
<b>SEA Stage B1</b>	<b>Key:</b>	<b>SMART criteria:</b>		
+ =	Compatible	<b>S – Specific:</b>	NDP objectives should specify what is intended to be done in detail and should not be open to a wide range of misinterpretations	The following matrix appraises the emerging Bodenham Neighbourhood Plan options in terms of their SMART criteria and their compatibility with the SEA Objectives. These have been developed from Government guidance on SEA and from the local evidence base gathered for identifying the NDP issues.
- =	Possible conflict	<b>M – Measurable:</b>	It should be possible to monitor NDP objectives in a quantifiable way, by the use of indicators. Indicators should be measurable with limited resource implications.	
0 =	Neutral	<b>A – Attainable/achievable:</b>	NDP objectives should be achievable and deliverable, related to the scale of growth proposed	
X =	No relationship between objectives	<b>R – Realistic:</b>	NDP objectives should relate to the overall vision of the plan. Likewise, chosen indicators should relate to objectives and their outcomes.	
? =	Unclear, more information needed	<b>T – Time-Bound:</b>	Objectives should be specific to the NDP period or another specified time-frame. Objectives should be associated with a target and indicators should specify when the target should be achieved.	

SEA Objectives	Baseline carried over from Stage A
<p>1- To maintain and enhance nature conservation (biodiversity, flora and fauna)</p> <p>2- To maintain and enhance the quality of landscapes and townscapes</p> <p>3- To improve quality of surroundings</p> <p>4- To conserve and where appropriate enhance the historic environment and culture heritage</p> <p>5- To improve air quality</p> <p>6- To reduce the effect of traffic on the environment</p> <p>7- To reduce contributions to climate change</p> <p>8- To reduce vulnerability to climate change</p> <p>9- To improve water quality</p> <p>10- To provide for sustainable sources of water supply</p> <p>11- To avoid, reduce and manage flood risk</p> <p>12- To conserve soil resources and quality</p> <p>13- To minimise the production of waste</p> <p>14- To improve health of the population</p> <p>15- To reduce crime and nuisance</p> <p>16- To conserve natural and manmade resources</p>	<p>1-Up-to-date countywide information will be presented in the next AMR and which is due to be published in 2014. The 2010/11 data indicates that 27% of Herefordshire's SSSI land was in favourable condition. At August 2014, there are one SSSI's within Bodenham - River Wye-Unfavourable recovering.</p> <p>In 2010/11: 17 Habitat Action Plans and 14 Species Action Plans are currently in operation across Herefordshire, however no locally specific data is available.</p> <p>Bodenham has: SSSI: 3, SWS: 8, Ancient woodlands: 18, 5 unregistered parks and gardens and the River Wye (River Lugg) SAC. There are no, NNRs and SINC's within the parish.. There is no locally specific data available at present.</p> <p>2-There are no outstanding enforcement actions or appeals concerning locally important buildings within conservation area.</p> <p>3-In terms of Bodenham , the study reveals that. 1,9ha playing pitch in associating with the school. Bowling club and tennis club and golf club..</p> <p>4-There are numerous listed buildings within the parish but no Schedule Ancient Monuments. There are no buildings at risk on the register</p> <p>5-Between 2005 and 2010 Herefordshire's total and per capita carbon emission reduced by 7% and 8% respectively; while UK's total and per capita carbon emission reduced by 8% and 12% respectively within the same period. This suggests that air quality is improving.</p> <p>6-% of Herefordshire residents who travel to work by: Car: 70.1%, Foot: 14.7%,Bicycle: 4.3%,Bus: 2%, Train: 0.8%,Motorbike: 0.8%,Taxi: 0.3%,Other: 7%.</p> <p>7-Herefordshire latest figure of C02 emissions per capita-dates back to 2010: 1.61 million tonnes (mtCO<sup>2</sup>)</p> <p>8-Reduce the risk of flooding-There have been no approvals contrary to EA advice since reporting began in 2004.The 2011-2013 AMR does not contain updated conservation data.</p> <p>9-Percentage of river length assessed as good or very good chemical quality and ecological quality as required by the Water Framework Directive. Latest figure dates back to 2005: 84%.</p> <p>10- The number of planning permissions granted contrary to the advice of the Environment Agency on flood defence grounds. However the 2001-13 AMR does not contain updated data Bodenham Parish Bodenham is within the River Wye hydrological catchment. Highlighted within the Lower Lugg catchment and subject to fluvial flooding</p> <p>11-Number of planning permissions granted contrary to the advice of the Environment Agency on flood defence grounds. The 2011-2013 AMR does not contain updated conservation data.</p> <p>12-The agricultural land classification around Bodenham is mainly Grade 2 (v good) or 3 (good to moderate). Percentage of all new developments completed on previously developed land; 67% (2010) and 57% (2011-13)</p> <p>16- There are numerous listed buildings within the parish but no Schedule Ancient Monuments. There are no buildings at risk on the register at present</p>

NDP Policies	SEA objectives																Summary in relation to baseline	Overall commentary and any initial cumulative effects/ Recommendations	Conformity with Core Strategy
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16			
<b>Baseline</b>	1	2	3	4	5	6	7	8	9	10	11	12	N/A	N/A	N/A	16			
Option 1 Do nothing	x	x	x	x	x	x	x	x	x	x	x	x			x		Do nothing option is essential not to produce a neighbourhood plan and rely on the criteria policies within the Core Strategy to guide further development. Specific policies and proposals for the parishes would not exist.	All developments would need to be in conformity with the Core Strategy. The Core Strategy has been subject to a Sustainability Appraisal and policies met the SEA objectives.	n/a
Option 2 Allocate sites for housing	++	++	++	++	++	+	++	++	++	+	++	+				++	Allocation of sites for housing or other uses would give certainty to future development. Specific environmental issues could be investigated during the site search and be positively addressed within the policy wording. The designation of a settlement boundary will give additional certainty and help define those areas considered as the built form and open countryside This option could have a positive effect on the baseline.	Pursuing this option would give greater certainty over future development within the area particularly within Bodenham and Bodenham Moor, where proportional growth is expected. However, this option is not seen favourable locally given the level of existing commitments. If required mitigation criteria can be added to site allocations policies to ensure all SEA objectives are achieved.	This option would meet the Core Strategy requirements in terms of the SEA.
Option 3 Manage future housing using a settlement boundary	+	+	+	+	+	+	+	+	+	+	+	+				+	The designation of a settlement boundary will give additional certainty and help define those areas considered as the built form and open countryside. This can aid the direction of further growth to maintain the quality of the landscape and surroundings. There is less certainty over the positive effects on the baseline as any growth will be adjudged by criteria based policy.	Any settlement boundary would need to be designated to ensure that sufficient capacity was included to permit the proportional growth requirements within Policy RA2 of the Core Strategy. Criteria would need to be included within the policy to safeguard against effects on any SEA objectives.	This option would meet the Core Strategy requirements in terms of the SEA.
Option 4 Allocate site and identify a settlement boundary	++	++	++	++	++	+	++	++	++	+	++	+				++	Allocation of sites for housing or other uses would give certainty to future development. Specific environmental issues could be investigated during the site search and be positively addressed within the policy wording. The designation of a	Pursuing this option would give greater certainty over future development within the area where proportional growth is expected. If required mitigation criteria can be added to site allocations policies to ensure all SEA objectives are achieved.	This option would meet the Core Strategy requirements in terms of the SEA.



																	settlement boundary will give additional certainty and help define those areas considered as the built form and open countryside This option could have a positive effect on the baseline.			
Option 5 Allocations for new businesses	?	?	+	++	0	0	+	+	++	+	++	+					++	Allocation of sites for employment would give certainty to future development. Specific environmental issues could be investigated during the site search and be positively addressed within the policy wording.	Pursuing this option would give greater certainty over future development within the area particularly within Bodenham and Bodenham Moor villages. If required mitigation criteria can be added to site allocations policies to ensure all SEA objectives are achieved.	This option would meet the Core Strategy requirements in terms of the SEA.
Option 6 Criteria for small scale business development and home working	+	+	+	+	+	+	+	+	+	+	+	+					+	Criteria based policy does not give the same level of certainty as the other options as it will be more reactionary than proactive in terms of growth proposals. This will encourage diversification and working from home, which will reduce the need to travel and site for larger propose built employment units. However provide criteria is added to the policy to safeguard or mitigate against any harm, the option will have a positive effect on the baseline.	Criteria would need to be included within the policy to safeguard against effects on any SEA objectives.	This option would meet the Core Strategy requirements in terms of the SEA
Option 7 Housing within Bodenham Moor only	?	+	+	+	+	+	+	+	+	+	?	+					+	This would seek to distribute the majority of the growth to Bodenham Moor, the larger of the two settlements. There may be issues regarding flooding in some areas.	Allocation of sites for housing or distribution of proportionate growth would give certainty to future development. Specific environmental issues could be investigated during the site search and be positively addressed within the policy wording.	This option would meet the Core Strategy requirements in terms of the SEA
Option 8 Housing within Bodenham only	?	+	+	?	+	+	+	?	+	+	?	+					+	This option would seek to distribute the majority of the growth to Bodenham, the smaller of the two highlighted settlements. There is also a conservation area and this part of the parish is closer to the River Wye (River Lugg) SAC	Allocation of sites for housing or distribution of proportionate growth would give certainty to future development. Specific environmental issues could be investigated during the site search and be positively addressed within the policy wording.	This option would meet the Core Strategy requirements in terms of the SEA
Option 9 Housing in both settlements	+	+	+	+	+	+	+	?	+	+	?	+					+	This option seeks to split the growth proportionally between both settlements highlighted for growth. It will enable these areas of the baseline to be avoided by seeking the most	Allocation of sites for housing or distribution of proportionate growth would give certainty to future development. Specific environmental issues could be investigated during the site search and	This option would meet the Core Strategy requirements in terms of the SEA

																		appropriate locations in both areas.	be positively addressed within the policy wording.	
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B3: Predict and evaluate the effects of the policies and sites within the Neighbourhood Development Plan

**Key:**

++ Move significantly	+ Move towards Marginally	- - Move away significantly	- Move away marginally	0 Neutral	? Uncertain	N/A No relationship
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towards

*Policy BNDP1: Delivering new housing*

SEA Objective	Assessment of effect (consider cumulative effects, significance of the effect and magnitude of the effect in terms of the three time periods)			Summary Explanation	Enhancement and mitigation opportunities
	Short term (1 – 5 years)	Medium term (6 – 10 years)	Long term (11 years +)		
To maintain and enhance nature conservation (biodiversity, flora and fauna)	?	+	+	This Policy is not over and above the Core Strategy in terms of SEA objectives and would lead to development in line with the proportional growth within the Core Strategy. Policy safeguards are included within the plan to ensure nature conservation is taken into consideration.	
To maintain and	?	+	+	This Policy is not over and	

B3: Predict and evaluate the effects of the policies and sites within the Neighbourhood Development Plan

enhance the quality of landscapes and townscapes				above the Core Strategy in terms of SEA objectives and would lead to development in line with the proportional growth within the Core Strategy. Policy safeguards are included within the plan (policy 7 to 10) to ensure landscape and townscape character is taken into consideration.	
To improve quality of surroundings	?	+	+	This Policy is not over and above the Core Strategy in terms of SEA objectives and would lead to development in line with the proportional growth within the Core Strategy. Policy safeguards are included within the plan to ensure character, setting and landscape is taken into consideration.	
To conserve and where appropriate enhance the historic environment and cultural heritage	?	+	+	This Policy is not over and above the Core Strategy in terms of SEA objectives and would lead to development in line with the proportional growth within the Core Strategy. Policy safeguards are included within the plan to ensure that the	

## B3: Predict and evaluate the effects of the policies and sites within the Neighbourhood Development Plan

				historic environment is taken into consideration.	
To improve air quality	?	+	+	This policy is in line with the growth requirements set out within the Core Strategy. Focusing development on sustainable locations will help reduce the need to travel to services and improve air quality	
To reduce the effect of traffic on the environment	?	+	+	This policy is in line with the growth requirements set out within the Core Strategy. Focusing development on sustainable locations will help reduce the need to travel to services	
To reduce contributions to climate change	?	+	+	This Policy is not over and above the Core Strategy in terms of SEA objectives and would lead to development in line with the proportional growth within the Core Strategy. Policy safeguards are included within the plan, particularly regarding flooding to ensure that contributions to climate changes are achieved.	

## B3: Predict and evaluate the effects of the policies and sites within the Neighbourhood Development Plan

To reduce vulnerability to climate change	?	+	+	This Policy is not over and above the Core Strategy in terms of SEA objectives and would lead to development in line with the proportional growth within the Core Strategy. Policy safeguards are included within the plan, particularly flooding to ensure that vulnerability is taken into account	
To improve water quality	?	+	++	The Nutrient Management Plan is in place to ensure that areas within the River Wye catchment area are contributing to meeting the conservation objectives of the SAC and improving water quality within the River Lugg.	
To provide for sustainable sources of water supply	+	+	+	Welsh water have confirmed that there is sufficient headroom within the works and sufficient supply	
To avoid, reduce and manage flood risk	?	+	+	Bodenham are very aware of the flooding issues within the parish and this has been address with additional policies within the plan. This will enable proportional growth to occur	

B3: Predict and evaluate the effects of the policies and sites within the Neighbourhood Development Plan

				whilst being minded of the existing issues.	
To conserve soil resources and quality	?	+	+	This policy is in line with the Core Strategy. The definition of a settlement boundary will direct the majority of development to sustainable locations and thus safeguard the wide soil resource within the parish	
To minimise the production of waste					
To improve health of the population					
To reduce crime and nuisance					
To conserve natural and manmade resources	?	+	+	This Policy is not over and above the Core Strategy in terms of SEA objectives and would lead to development in line with the proportional growth within the Core Strategy. Policy safeguards are included within the plan to ensure aspects of the natural and manmade environment are taken into consideration.	

## B3: Predict and evaluate the effects of the policies and sites within the Neighbourhood Development Plan

<b>Overall commentary and any cumulative effects</b>	The policy is in line with the proportional growth requirements within policy RA2 of the Core Strategy. Policy safeguards exist within the plan and the Core strategy to ensure that baseline objectives are met and there are no adverse cumulative effects. Policies regarding flooding and the Nutrient management plan are especially important given the proximity of the River Lugg.
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*Policy BNDP2: Settlement boundaries*

<b>SEA Objective</b>	<b>Assessment of effect</b> (consider cumulative effects, significance of the effect and magnitude of the effect in terms of the three time periods)			<b>Summary Explanation</b>	<b>Enhancement and mitigation opportunities</b>
	<b>Short term</b> (1 – 5 years)	<b>Medium term</b> (6 – 10 years)	<b>Long term</b> (11 years +)		
To maintain and enhance nature conservation (biodiversity, flora and fauna)	+	+	+	This Policy is not over and above the Core Strategy in terms of SEA objectives and would lead to development in line with the proportional growth within the Core Strategy. Policy safeguards are included within the plan to ensure nature conservation is taken into consideration.	



B3: Predict and evaluate the effects of the policies and sites within the Neighbourhood Development Plan

<p>To maintain and enhance the quality of landscapes and townscapes</p>	<p>+</p>	<p>+</p>	<p>+</p>	<p>This Policy is not over and above the Core Strategy in terms of SEA objectives and would lead to development in line with the proportional growth within the Core Strategy. Policy safeguards are included within the plan (policy 7 to 10) to ensure landscape and townscape character is taken into consideration.</p>	
<p>To improve quality of surroundings</p>	<p>+</p>	<p>+</p>	<p>+</p>	<p>This Policy is not over and above the Core Strategy in terms of SEA objectives and would lead to development in line with the proportional growth within the Core Strategy. Policy safeguards are included within the plan to ensure character, setting and landscape is taken into consideration.</p>	
<p>To conserve and where appropriate enhance the historic environment and cultural heritage</p>	<p>+</p>	<p>+</p>	<p>+</p>	<p>This Policy is not over and above the Core Strategy in terms of SEA objectives and would lead to development in line with the proportional growth within the Core Strategy. Policy safeguards are included within</p>	

## B3: Predict and evaluate the effects of the policies and sites within the Neighbourhood Development Plan

				the plan to ensure that the historic environment is taken into consideration.	
To improve air quality	+	+	+	This policy is in line with the growth requirements set out within the Core Strategy. Focusing development on sustainable locations will help reduce the need to travel to services and improve air quality	
To reduce the effect of traffic on the environment	+	+	+	This policy is in line with the growth requirements set out within the Core Strategy. Focusing development on sustainable locations will help reduce the need to travel to services	
To reduce contributions to climate change	+	+	+	This Policy is not over and above the Core Strategy in terms of SEA objectives and would lead to development in line with the proportional growth within the Core Strategy. Policy safeguards are included within the plan, particularly regarding flooding to ensure that contributions to climate changes	

## B3: Predict and evaluate the effects of the policies and sites within the Neighbourhood Development Plan

				are achieved.	
To reduce vulnerability to climate change	+	+	+	This Policy is not over and above the Core Strategy in terms of SEA objectives and would lead to development in line with the proportional growth within the Core Strategy. Policy safeguards are included within the plan, particularly flooding to ensure that vulnerability is taken into account	
To improve water quality	+	+	+	The Nutrient Management Plan is in place to ensure that areas within the River Wye catchment area are contributing to meeting the conservation objectives of the SAC and improving water quality within the River Lugg.	
To provide for sustainable sources of water supply	+	+	+	Welsh water have confirmed that there is sufficient headroom within the works and sufficient supply	
To avoid, reduce and manage flood risk	+	+	+	Bodenham are very aware of the flooding issues within the parish and this has been address with additional policies within the plan. This will enable	

B3: Predict and evaluate the effects of the policies and sites within the Neighbourhood Development Plan

				proportional growth to occur whilst being minded of the existing issues.	
To conserve soil resources and quality	+	+	+	This policy is in line with the Core Strategy. The definition of a settlement boundary will direct the majority of development to sustainable locations and thus safeguard the wide soil resource within the parish	
To minimise the production of waste					
To improve health of the population					
To reduce crime and nuisance					
To conserve natural and manmade resources	+	+	+	This Policy is not over and above the Core Strategy in terms of SEA objectives and would lead to development in line with the proportional growth within the Core Strategy. Policy safeguards are included within the plan to ensure aspects of the natural and manmade environment are taken into	

## B3: Predict and evaluate the effects of the policies and sites within the Neighbourhood Development Plan

				consideration.	
<b>Overall commentary and any cumulative effects</b>	The designation of two settlement boundaries given more certainty to growth and its locations. Sufficient policy safeguards exist particularly around flooding and the protection of the character and setting of the two villages. The policy is in conformity with the Core Strategy rural policies.				

*Policy BNDP3: Mix, type and tenure of new housing development*

<b>SEA Objective</b>	<b>Assessment of effect</b> (consider cumulative effects, significance of the effect and magnitude of the effect in terms of the three time periods)			<b>Summary Explanation</b>	<b>Enhancement and mitigation opportunities</b>
	<b>Short term</b> (1 – 5 years)	<b>Medium term</b> (6 – 10 years)	<b>Long term</b> (11 years +)		
To maintain and enhance nature conservation (biodiversity, flora and fauna)	?	+	+	The policy is in conformity with policy H2 and sufficient safeguards exist within other policies of the plan.	
To maintain and enhance the quality of landscapes and	+	+	+	The policy is in conformity with policy H2 and sufficient safeguards exist within other policies of the	

## B3: Predict and evaluate the effects of the policies and sites within the Neighbourhood Development Plan

townscapes				plan.	
To improve quality of surroundings	+	+	+	The policy is in conformity with policy H2 and sufficient safeguards exist within other policies of the plan.	
To conserve and where appropriate enhance the historic environment and cultural heritage	+	+	+	The policy is in conformity with policy H2 and sufficient safeguards exist within other policies of the plan.	
To improve air quality	+	+	+	The policy is in conformity with policy H2 and sufficient safeguards exist within other policies of the plan. The provision of affordable homes near to existing facilities will help to reduce the need to travel and improve air quality	
To reduce the effect of traffic on the environment	+	+	+	The policy is in conformity with policy H2 and sufficient safeguards exist within other policies of the plan. The provision of affordable homes near to facilities will help to reduce the need to travel.	
To reduce contributions to climate change	+	+	+	The policy is in conformity with policy H2 and sufficient safeguards exist within other policies of the plan.	

## B3: Predict and evaluate the effects of the policies and sites within the Neighbourhood Development Plan

To reduce vulnerability to climate change	?	+	+	The policy is in conformity with policy H2 and sufficient safeguards exist within other policies of the plan.	
To improve water quality	?	+	+	The policy is in conformity with policy H2 and sufficient safeguards exist within other policies of the plan. The Nutrient Management Plan is in place to help safeguard water quality within the River Wye and River Lugg.	
To provide for sustainable sources of water supply	+	+	+	Welsh water have confirmed that there is sufficient headroom within the works and sufficient supply	
To avoid, reduce and manage flood risk	+	+	+	The policy is in conformity with policy H2 and sufficient safeguards exist within other policies of the plan. Additional policy safeguards exist within BNDP4 to ensure that this locally important issues is addressed	
To conserve soil resources and quality	+	+	+	The policy is in conformity with policy H2 and sufficient safeguards exist within other policies of the plan.	
To minimise the production of waste					
To improve health of					

B3: Predict and evaluate the effects of the policies and sites within the Neighbourhood Development Plan

the population					
To reduce crime and nuisance					
To conserve natural and manmade resources	+	+	+	The policy is in conformity with policy H2 and sufficient safeguards exist within other policies of the plan.	
<b>Overall commentary and any cumulative effects</b>	This policy is in line with Core Strategy policy H2 and a number of other policies are contained within the plan to ensure that any effects are reduced or mitigated.				

*Policy BNDP4: Flood risk and drainage*

SEA Objective	Assessment of effect (consider cumulative effects, significance of the effect and magnitude of the effect in terms of the three time periods)			Summary Explanation	Enhancement and mitigation opportunities
	Short term (1 – 5 years)	Medium term (6 – 10 years)	Long term (11 years +)		



## B3: Predict and evaluate the effects of the policies and sites within the Neighbourhood Development Plan

To maintain and enhance nature conservation (biodiversity, flora and fauna)	++	++	++	This policy is seeking to address some of the known flooding issues within Bodenham. This could have a positive consequence on area of nature conservation and species habitats.	
To maintain and enhance the quality of landscapes and townscapes	+	+	++	The reduction and management of flooding occurrences could have a positive effect on the quality of the townscape and sense of place.	
To improve quality of surroundings	+	+	++	The reduction and management of flooding occurrences could have a positive effect on the quality of the townscape and sense of place.	
To conserve and where appropriate enhance the historic environment and cultural heritage	x	x	x	No relationship	
To improve air quality	x	x	x	No relationship	
To reduce the effect of traffic on the environment	x	x	x	No relationship	
To reduce contributions to climate change	++	++	++	The management of the flooding and drainage issues within the parish will have a positive effect in the management of climate change	

B3: Predict and evaluate the effects of the policies and sites within the Neighbourhood Development Plan

				and the impact on existing and future residents and businesses.	
To reduce vulnerability to climate change	++	++	++	The management of the flooding and drainage issues within the parish will have a positive effect in the management of climate change and the impact on existing and future residents and businesses.	
To improve water quality	+	+	+	The Nutrient Management plan is in place to assist improve the water quality along this stretch of the River Lugg. The policy have reference to this in the management of foul water and run off	
To provide for sustainable sources of water supply	+	+	+		
To avoid, reduce and manage flood risk	++	++	++	The principle of this policy is to management and improve the known flood issues within the parish.	
To conserve soil resources and quality	+	+	+	The principle of this policy is to reduce and management surface water flooding within the area	

B3: Predict and evaluate the effects of the policies and sites within the Neighbourhood Development Plan

To minimise the production of waste					
To improve health of the population					
To reduce crime and nuisance					
To conserve natural and manmade resources	+	+	+	The policy is seeking to management flooding and drainage issues within the parish.	
<b>Overall commentary and any cumulative effects</b>	There are well known flooding and drainage issues within the parish. This policy aims to address this when considering future development within the parish. This policy will have a positive effect on the baseline.				

*Policy BNDP5: Employment*

SEA Objective	Assessment of effect (consider cumulative effects, significance of the effect and magnitude of the effect in terms of the three time periods)			Summary Explanation	Enhancement and mitigation opportunities
	Short term (1 – 5 years)	Medium term (6 – 10 years)	Long term (11 years +)		

## B3: Predict and evaluate the effects of the policies and sites within the Neighbourhood Development Plan

To maintain and enhance nature conservation (biodiversity, flora and fauna)	+	+	+	This Policy is not over and above the Core Strategy in terms of SEA objectives and would lead to small scale employment development in line with the Core Strategy. Policy safeguards are included within the plan to ensure nature conservation is taken into consideration.	
To maintain and enhance the quality of landscapes and townscapes	+	+	+	This Policy is not over and above the Core Strategy in terms of SEA objectives and would lead to small scale employment development in line with the Core Strategy. Policy safeguards are included within the plan (policy 7 to 10) to ensure landscape and townscape character is taken into consideration.	
To improve quality of surroundings	+	+	+	This Policy is not over and above the Core Strategy in terms of SEA objectives and would lead to small scale employment development in line with the Core Strategy. Policy safeguards are included within the plan (policy 7 to 10) to ensure the character of the surroundings is taken into consideration.	
To conserve and where appropriate enhance the historic environment and	+	+	+	This policy is not over and above the Core Strategy and would lead to small scale employment development. Policy safeguards exist to ensure that the historic	

## B3: Predict and evaluate the effects of the policies and sites within the Neighbourhood Development Plan

cultural heritage				environment is taken into consideration.	
To improve air quality	+	+	+	The policy encourages the provision of small business space, live work and home working. This will help to reduce the need to travel but may also encourage additional travel for some employees. This would have a consequential effect on air quality.	
To reduce the effect of traffic on the environment	o	o	+	The policy encourages the provision of small business space, live work and home working. This will help to reduce the need to travel but may also encourage additional travel for some employees.	
To reduce contributions to climate change	?	+	+	Additional policies within the plan will safeguard this element	
To reduce vulnerability to climate change	?	+	+	Additional policies within the plan will safeguard this element, particularly policy BNDP4.	
To improve water quality	?	+	+	The Nutrient Management Plan will provide additional safeguards to ensure that water quality within the River Lugg catchment is meeting the directive standards	
To provide for sustainable sources of water supply	?	+	+	The policy is seeking to encourage small scale businesses and opportunities to work from home rather than larger scale which may consume higher volumes of water	

## B3: Predict and evaluate the effects of the policies and sites within the Neighbourhood Development Plan

				supply.	
To avoid, reduce and manage flood risk	+	+	+	The policy is seeking to provide small scale employment and sufficient safeguards exist within other policies of the plan. Additional policy safeguards exist within BNDP4 to ensure that this locally important issues is addressed	
To conserve soil resources and quality	+	+	+	This policy is seeking to reuse existing building, working for home and small scale new development. This will safeguard soil resource whilst providing employment opportunities	
To minimise the production of waste					
To improve health of the population					
To reduce crime and nuisance					
To conserve natural and manmade resources	+	+	+	Policy criteria and safeguards are seeking to maintain a number of natural and manmade resources.	
<b>Overall commentary and any cumulative effects</b>	This policy is seeking to provide local employment opportunities and reduce the need to travel.				

## B3: Predict and evaluate the effects of the policies and sites within the Neighbourhood Development Plan

*Policy BNDP6: Local community facilities*

SEA Objective	Assessment of effect (consider cumulative effects, significance of the effect and magnitude of the effect in terms of the three time periods)			Summary Explanation	Enhancement and mitigation opportunities
	Short term (1 – 5 years)	Medium term (6 – 10 years)	Long term (11 years +)		
To maintain and enhance nature conservation (biodiversity, flora and fauna)	x	x	x	No relationship	
To maintain and enhance the quality of landscapes and townscapes	+	+	+	This policy is seeking to retain and encourage community facilities within the parish. This will have a positive effect on the quality of the townscape and sense of place.	
To improve quality of surroundings	+	+	+	The retention and the encouragement of community facilities will help to maintain the quality of the village and their	

## B3: Predict and evaluate the effects of the policies and sites within the Neighbourhood Development Plan

				surroundings.	
To conserve and where appropriate enhance the historic environment and cultural heritage	x	x	x	No relationship	
To improve air quality	+	+	+	The provision of local community facilities will help to reduce the need to travel which in term could have a positive effect on air quality	
To reduce the effect of traffic on the environment	+	+	+	The provision of community facilities and the encouragement of open space, cycling and walking routes will have reduce the levels of traffic within the villages and parish.	
To reduce contributions to climate change	+	+	+	The provision of community facilities and the encouragement of open space, cycling and walking routes will have reduce the levels of traffic within the villages and parish. This will help contribute to climate change reduction	



## B3: Predict and evaluate the effects of the policies and sites within the Neighbourhood Development Plan

To reduce vulnerability to climate change	+	+	+	Criteria exists within the policy to encourage developer contributions to assist with reducing risk of flooding.	
To improve water quality	+	+	+	The Nutrient management plan and other policies safeguards are in place to improve water quality within the River Lugg	
To provide for sustainable sources of water supply	x	x	x	No relationship	
To avoid, reduce and manage flood risk	+	+	+	The provision of community facilities and the encouragement of open space, cycling and walking routes will have reduce the levels of traffic within the village and parish.	
To conserve soil resources and quality	+	+	+	The retention of existing facilities assist in reducing the requirement to develop on greenfields.	
To minimise the production of waste					

B3: Predict and evaluate the effects of the policies and sites within the Neighbourhood Development Plan

To improve health of the population					
To reduce crime and nuisance					
To conserve natural and manmade resources	+	+	+	The policy is seeking to retain existing community facilities within the villages and encourage developer contributions to provide additional requirements.	
<b>Overall commentary and any cumulative effects</b>	The policy is seeking to safeguard existing facilities and promote accessible transport choices to them. This will have a positive effect on the baseline.				

*Policy BNDP7: Protecting landscape and important public views*

SEA Objective	Assessment of effect (consider cumulative effects, significance of the effect and magnitude of the effect in terms of the three time periods)			Summary Explanation	Enhancement and mitigation opportunities
	Short term (1 – 5 years)	Medium term (6 – 10 years)	Long term (11 years +)		

## B3: Predict and evaluate the effects of the policies and sites within the Neighbourhood Development Plan

To maintain and enhance nature conservation (biodiversity, flora and fauna)	+	+	+	The policy aims to respect the character of the surrounding landscape, this will have the potential consequential benefits to the natural environment	
To maintain and enhance the quality of landscapes and townscapes	++	++	++	The principle of this policy is landscape character and type and the landscape setting of any proposals.	
To improve quality of surroundings	++	++	++	The principle of this policy is landscape character and type and the landscape setting of any proposals.	
To conserve and where appropriate enhance the historic environment and cultural heritage	+	+	+	The principle of this policy is landscape character and type and the landscape setting of any proposals. This will have a consequential positive effect on the cultural and historical environment of the villages within this landscape setting	
To improve air quality	X	X	X	No relationship	
To reduce the effect of traffic on the environment	X	X	X	No relationship	
To reduce contributions to climate change	X	X	X	No relationship	

## B3: Predict and evaluate the effects of the policies and sites within the Neighbourhood Development Plan

To reduce vulnerability to climate change	X	X	X	No relationship	
To improve water quality	X	X	X	No relationship	
To provide for sustainable sources of water supply	X	X	X	No relationship	
To avoid, reduce and manage flood risk	X	X	X	No relationship	
To conserve soil resources and quality	+	+	+	The protection of the surrounding landscape will have a positive effect on conserving soil resource and quality.	
To minimise the production of waste					
To improve health of the population					
To reduce crime and nuisance					
To conserve natural and manmade resources	+	++	++	The principle of the policy is to conserve, enhance and maintain elements of the natural environment	
<b>Overall commentary and any cumulative</b>	The principle of the policy is to conserve, enhance and maintain the landscape setting and character in and around the parish. This will have a positive effect on many of the objectives and baselines				

## B3: Predict and evaluate the effects of the policies and sites within the Neighbourhood Development Plan

<b>effects</b>	
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*Policy BNDP8: Landscape design principles*

<b>SEA Objective</b>	<b>Assessment of effect</b> (consider cumulative effects, significance of the effect and magnitude of the effect in terms of the three time periods)			<b>Summary Explanation</b>	<b>Enhancement and mitigation opportunities</b>
	<b>Short term</b> (1 – 5 years)	<b>Medium term</b> (6 – 10 years)	<b>Long term</b> (11 years +)		
To maintain and enhance nature conservation (biodiversity, flora and fauna)	++	++	++	The policy is seeking to protect landscape features including wildlife corridors, veteran trees and orchards. These are natural habitats for a variety of species, therefore would have a positive effect on this baseline	
To maintain and enhance the quality of landscapes and townscapes	++	++	++	The policy is seeking to protect a number of landscape features which contribute to the character of the villages and surrounding parish	

## B3: Predict and evaluate the effects of the policies and sites within the Neighbourhood Development Plan

To improve quality of surroundings	++	++	++	The protection of these features will have a positive effect on the quality of the surroundings and the sense of place	
To conserve and where appropriate enhance the historic environment and cultural heritage	++	++	++	The protections of these features could have a positive effect on the cultural and historic setting of the villages and parish	
To improve air quality	+	+	+	The protection of natural features will help to improve and maintain the air quality	
To reduce the effect of traffic on the environment	x	x	x	No relationship	
To reduce contributions to climate change	+	+	+	The protection of these natural features will help to reduce greenhouse gases and contribute to reducing the effects of climate change	
To reduce vulnerability to climate change	+	+	+	The protection of these natural features will help to reduce greenhouse gases and contribute to reducing the effects of climate change	

## B3: Predict and evaluate the effects of the policies and sites within the Neighbourhood Development Plan

To improve water quality	+	+	+	The Nutrient Management Plan and other policies will contribute to meeting the water quality requirements within the River Lugg	
To provide for sustainable sources of water supply	x	x	x	No relationship	
To avoid, reduce and manage flood risk	+	+	+	The protection of areas of green and open space could provide flood storage and assist in the management of the known flood risk within the area	
To conserve soil resources and quality	++	++	++	The protection of areas of green and open space will help to maintain soil resources within and around the parish	
To minimise the production of waste					
To improve health of the population					
To reduce crime and nuisance					

## B3: Predict and evaluate the effects of the policies and sites within the Neighbourhood Development Plan

To conserve natural and manmade resources	++	++	++	The principle aim of the policy is to protect features within the natural environment.	
<b>Overall commentary and any cumulative effects</b>	The policy is seeking to protect a number of landscape and natural features. This will have a consequential positive effect of the other objectives.				

*Policy BNDP9: Protection of local character*

SEA Objective	Assessment of effect (consider cumulative effects, significance of the effect and magnitude of the effect in terms of the three time periods)			Summary Explanation	Enhancement and mitigation opportunities
	Short term (1 – 5 years)	Medium term (6 – 10 years)	Long term (11 years +)		
To maintain and enhance nature conservation (biodiversity, flora and fauna)	++	++	++	Specific criteria exists within the policy to promote regard to the natural characteristics of the landscape. The reduction in street lighting will also have a positive effect on nocturnal species	Specific reference could be made to biodiversity to strengthen the policy further.
To maintain and enhance the quality of	++	++	++	Specific criteria exists within the policy to promote regard to the landscape context and	



## B3: Predict and evaluate the effects of the policies and sites within the Neighbourhood Development Plan

landscapes and townscapes				characteristics.	
To improve quality of surroundings	++	++	++	Specific criteria exists within the policy to promote regard to the natural and settlement characteristics within the landscape	
To conserve and where appropriate enhance the historic environment and cultural heritage	++	++	++	Specific criteria exists within the policy to promote regard to the historical character of settlements and buildings of heritage value	
To improve air quality	+	+	+	The protection of the landscape will have a consequential positive effect on air quality. The policy also seeks to promote cycling and walking to reduce reliance on the private car.	
To reduce the effect of traffic on the environment	+	+	+	The policy includes criteria to reduce the reliance on the private car and promote cycling and walking	
To reduce contributions to climate change	?	+	+	Protection of landscape features and the promoting of cycling and walking may in the longer term have some positive effects on contributions to reducing climate change	

## B3: Predict and evaluate the effects of the policies and sites within the Neighbourhood Development Plan

To reduce vulnerability to climate change	x	x	x	No relationship	
To improve water quality	x	x	x	No relationship	
To provide for sustainable sources of water supply	x	x	x	No relationship	
To avoid, reduce and manage flood risk	x	x	x	No relationship	
To conserve soil resources and quality	x	x	x	No relationship	
To minimise the production of waste					
To improve health of the population					
To reduce crime and nuisance					
To conserve natural and manmade resources	+	+	+	The policy is principally encouraging any development to be responsive to the natural environment and be designed to protect and enhance its surroundings	
<b>Overall commentary and any cumulative</b>	The policy is principally encouraging any development to be responsive to the natural environment and be designed to protect and enhance its surroundings. This is will have positive effect on many of the SEA				

## B3: Predict and evaluate the effects of the policies and sites within the Neighbourhood Development Plan

<b>effects</b>	objectives.
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*Policy BNDP10: Open spaces*

<b>SEA Objective</b>	<b>Assessment of effect</b> (consider cumulative effects, significance of the effect and magnitude of the effect in terms of the three time periods)			<b>Summary Explanation</b>	<b>Enhancement and mitigation opportunities</b>
	<b>Short term</b> (1 – 5 years)	<b>Medium term</b> (6 – 10 years)	<b>Long term</b> (11 years +)		
To maintain and enhance nature conservation (biodiversity, flora and fauna)	+	+	+	The protection of open spaces and green areas with have a consequential positive effect on biodiversity and the natural environment.	
To maintain and enhance the quality of landscapes and townscapes	++	++	++	The protection of open spaces and green areas with have a positive effect on the quality of the setting and townscape of the villages within the parish	
To improve quality of surroundings	++	++	++	The protection of open spaces and green areas with create a sense of place and improve the quality of the surroundings	

## B3: Predict and evaluate the effects of the policies and sites within the Neighbourhood Development Plan

To conserve and where appropriate enhance the historic environment and cultural heritage	+	+	+	Many of the open spaces and green areas will have a cultural or historical significance to the villages and wider parish	
To improve air quality	+	+	+	Protection of green areas will have a consequential benefit of provide the ability to improve air quality	
To reduce the effect of traffic on the environment	x	x	x	No relationship	
To reduce contributions to climate change	+	+	+	The protection of green areas within the settlement boundary can provide areas for surface water drainage.	
To reduce vulnerability to climate change	+	+	+	Some open spaces and green areas can provide additional flood storage and contribution to flood management	
To improve water quality	x	x	x	No relationship	
To provide for sustainable sources of water supply	x	x	x	No relationship	
To avoid, reduce and	+	+	+	Some open spaces and green areas can provide additional flood	

## B3: Predict and evaluate the effects of the policies and sites within the Neighbourhood Development Plan

manage flood risk				storage and contribution to flood management	
To conserve soil resources and quality	+	+	+	The protection of open areas can contribute to soil management on a small scale	
To minimise the production of waste					
To improve health of the population					
To reduce crime and nuisance					
To conserve natural and manmade resources	+	+	+	The principle aim of the policy is to safeguard areas of natural resource within the settlement boundary and wider parish	
<b>Overall commentary and any cumulative effects</b>	The policy is safeguarding areas of open space and local green space from development within the settlement boundary and the wider parish. This will have positive effects on a number of SEA objectives and baselines.				

*Policy BDNP11: Renewable energy*

<b>SEA Objective</b>	<b>Assessment of effect</b> (consider cumulative effects, significance of the effect and magnitude of the effect in terms of the three time periods)	<b>Summary Explanation</b>	<b>Enhancement and mitigation opportunities</b>

## B3: Predict and evaluate the effects of the policies and sites within the Neighbourhood Development Plan

	<b>Short term</b> (1 – 5 years)	<b>Medium term</b> (6 – 10 years)	<b>Long term</b> (11 years +)		
To maintain and enhance nature conservation (biodiversity, flora and fauna)	?	+	+	This policy is locational and type dependent. However there are policy safeguards in place to ensure that negative effects on nature conservation are mitigated or avoided	
To maintain and enhance the quality of landscapes and townscapes	+	+	+	The policy is seeking to support small scale renewable energy schemes where appropriate. Policy safeguards exist within the plan.	
To improve quality of surroundings	+	+	+	The policy is seeking to support small scale renewable energy schemes where appropriate. Policy safeguards exist within the plan.	
To conserve and where appropriate enhance the historic environment and cultural heritage	?	+	+	The policy is seeking to support small scale renewable energy schemes where appropriate. Policy safeguards exist within the plan.	

## B3: Predict and evaluate the effects of the policies and sites within the Neighbourhood Development Plan

To improve air quality	x	x	x	No relationship	
To reduce the effect of traffic on the environment	x	x	x	No relationship	
To reduce contributions to climate change	+	+	+	The policy is seeking to support small scale renewable energy schemes where appropriate. This will help contribute to reducing climate change	
To reduce vulnerability to climate change	x	x	x	No relationship	
To improve water quality	x	x	x	No relationship	
To provide for sustainable sources of water supply	x	x	x	No relationship	
To avoid, reduce and manage flood risk	?	+	+	These policy is locational dependant. However policy safeguards exist within BNDP4 to ensure that mitigation and avoidance is in place	
To conserve soil resources and quality	?	+	+	The policy is aiming at small scale schemes, which will reduce the need for large areas	

B3: Predict and evaluate the effects of the policies and sites within the Neighbourhood Development Plan

				of higher grade land	
To minimise the production of waste					
To improve health of the population					
To reduce crime and nuisance					
To conserve natural and manmade resources	+	+	+	This policy is seeking to encourage the production of renewable energy where possible	
<b>Overall commentary and any cumulative effects</b>	The policy is seeking to support small scale renewable energy schemes where appropriate. Sufficient policy safeguards exists to ensure that the effects on the SEA objectives are avoided or mitigated.				



**Key:**

++ Move significantly towards	+ Move towards marginally	-- Move away Significantly	- Move away marginally	0 Neutral	? Uncertain	X No relationship
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SEA Objective / Policy	1. To maintain and enhance nature conservation (biodiversity, flora and fauna)	2. To maintain and enhance the quality of landscapes and townscapes	3. To improve quality of surroundings	4. To conserve and where appropriate enhance the historic environment and culture heritage	5. To improve air quality	6. To reduce the effect of traffic on the environment	7. To reduce contributions to climate change	8. To reduce vulnerability to climate change	9. To improve water quality	10. To provide for sustainable sources of water supply	11. To avoid, reduce and manage flood risk	12. To conserve soil resources and quality	13. To minimise the production	14. To improve health of the population	15. To reduce crime and nuisance	16. To conserve natural and manmade resources
Objective 1 – Housing requirements	?	?	?	?	+	o	?	?	?	+	?	o				?
Objective 2 – Settlement boundary	?	+	+	?	+	o	?	?	?	+	?	+				+
Objective 3 – Settlement boundary	+	+	+	+	+	+	+	+	+	+	+	+				+
Objective 4 – Criteria for new housing	+	+	+	+	+	+	+	+	+	+	?	+				+
Objective 5 – Jobs	x	+	+	+	+	+	x	x	x	x	x	x				
Objective 6 – Jobs	+	+	+	+	?	o	?	?	?	+	?	+			x	+
Objective 7 – Local services	x	+	+	x	+	+	+	x	?	x	+	+				+
Objective 8 – Local services	?	+	+	?	+	+	x	+	+	+	++	+				+
Objective 9 – Local services	x	+	+	+	+	+	x	x	x	x	+	x				+

Objective 10 – Open spaces and the environment	+	+	+	+	+	x	+	+	+	+	+	+				+
Objective 11 – Open spaces and the environment	+	+	+	+	+	+	+	+	+	+	+	+				+
Objective 12 – Renewable energy	?	+	+	+	+	x	+	?	?	+	?	+				+
BNDP1	?	?	?	?	?	?	?	?	?	?	?	?				?
BNDP2	+	+	+	+	+	+	+	+	?	+	+	+				+
BNDP3	?	+	+	+	+	+	+	?	?	+	+	+				+
BNDP4	++	+	+	x	x	x	++	++	+	+	++	+				+
BNDP5	+	+	+	+	+	o	?	?	?	+	+	+				+
BNDP6	x	+	+	x	+	+	+	+	+	x	+	+				+
BNDP7	+	++	++	+	x	x	x	x	x	x	x	+				+
BNDP8	++	++	++	++	+	x	+	+	+	x	+	++				++
BNDP9	++	++	++	++	+	?	?	x	x	x	x	+				+
BNDP10	+	++	++	+	+	x	+	+	x	x	+	+				+
BNDP11	?	+	+	?	x	x	+	x	x	x	?	?				+
<b>Summary of effects of whole plan on each SEA Objective</b>	+	+	+	+	+	+	+	+	+	+	+	+				+
<b>Cumulative effects of whole plan (1 + 2 + 3...)</b>	Overall the Bodenham neighbourhood plan will contribute towards achieving the SEA objectives and consequently there is no reason why there should be a negative effect on the baseline. Policies have been drafted in general conformity with the Core Strategy and none are in direct conflict with the adopted plan policies. Criteria exists within the NDP policies to ensure sufficient policy safeguards are in place.															
<b>Commentary for significant cumulative effects</b>	No significant cumulative effects identified.															

# Appendix 5

**Options Considered in preparation of Bodenham NDP**

- Option 1 Do nothing
- Option 2 Allocate sites for housing
- Option 3 Manage future housing growth using a settlement boundary
- Option 4 Allocate sites and identify a settlement boundary
- Option 5 Allocations for new businesses
- Option 6 Criteria for small scale business development and home working
- Option 7 Housing in Bodenham Moor only
- Option 8 Housing in Bodenham only
- Option 9 Housing in both settlements

# Appendix 6

**Consultation date:** 3 October to 14 November 2016

**Consultation title:** Environmental Report - Bodenham Neighbourhood Plan Regulation 14

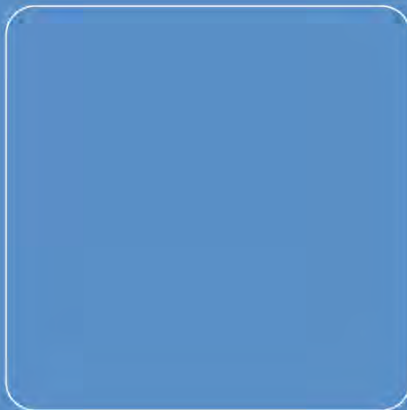
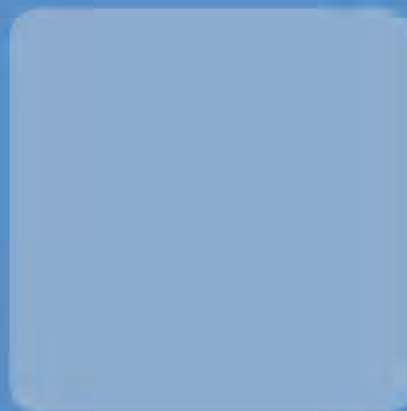
*N.B. This consultation feedback is **only** for comments received on the SEA of the draft Neighbourhood Development Plan*

Consultee	Summary of Comments	Response to Comments
Natural England	Welcome production of the SEA and notes and concurs with the conclusions of the Report	noted
English Heritage / Heritage England	No comments received	n/a
Environment Agency	No comments received specifically to the SEA	n/a
Natural Resources Wales	No comments received	n/a
RPS on behalf of Bovis Homes	<p>Concern about the robustness of the approach and partial SEA assessment which focuses only on environmental factors.</p> <p>Assessing the options – options are focused on residential. Indicates that there is uncertainty about the parish to grow in line to meet the housing requirements of the Herefordshire Core Strategy highlighting a potential conflict.</p> <p>The findings of the report to allocate sites do not appear to have been taken into account. Appears that the ER has been undertaken in isolation from the Draft BNDP. The BNDP should be guided by the ER and introduce allocate sites for housing as part of the plan process.</p> <p>Further consideration of options – ER has considered high level spatial options but unclear how this information has informed the plan making process. Alternative options should be appraised and contribute towards site selection process.</p> <p>The imposition of the settlement boundary is linked to delivery of spatial policy BNDP1 and as such should have tested alternative options for delivery much like Hensfield NDP.</p>	<p>The assessment is a Strategic Environmental Assessment not a full Sustainability Appraisal.</p> <p>The Herefordshire Core Strategy highlights proportional growth targets for a number of settlements including Bodenham and Bodenham Moor which NDPs are expected to facilitate either via site allocations or positive criteria based policy. For the parish of Bodenham, this proportional growth is 72 dwellings between 2011 and 2031. To date much of this proportionate growth has been provided via planning permissions; many of which have commenced, during the lifetime of the NDPs productions. In fact the production of plan was reacting to the live planning applications meeting the proportional growth requirements.</p>

RPS

Bodenham Neighbourhood Plan:  
Regulation 14 Consultation

RPS Response on Behalf of Bovis  
Homes



**BODENHAM NEIGHBOURHOOD PLAN  
: REGULATION 14 CONSULTATION**

**RESPONSE BY RPS ON BEHALF OF  
BOVIS HOMES**

Date 14 November 2016

**Our Ref: JBB8225.C4834**

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# QUALITY MANAGEMENT

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# 1 INTRODUCTION

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- 1.1 RPS has been instructed by Bovis Homes to respond to the Regulation 14 Consultation of the Bodenham Neighbourhood Development Plan (BNDP) ahead of Examination before an appointed Inspector.
- 1.2 The Draft BNDP has been prepared by Bodenham Parish Council, who act as the relevant body for preparing the NDP and the BNDP Steering Group has overseen the decision making process throughout the plan development. The Draft BNDP corresponds with the Bodenham Parish Boundary, including a number of villages though Figure 1 of the Draft BNDP draws attention to Bodenham Moor and Bodenham, which RPS understands to be the largest and most service rich settlements.
- 1.3 RPS is principally concerned with the treatment of Land South of Chapel Lane within the Draft BNDP. This site, also referred to as “*Shuker’s Field*’ elsewhere in the supporting documentation, has been promoted by RPS on behalf of Bovis Homes as an appropriate site for residential use and public open space. The scheme previously presented to the Council is included as **Appendix 1**. For clarity, the site will be referred to as Land South of Chapel Lane through the course of this response.
- 1.4 The BNDP includes the site of one of many Local Green Spaces within plan area, a proposal that RPS wholly objects to. In response to this RPS includes additional evidence to demonstrate that the BNDPs assessment of this site is flawed and it is not capable of meeting the tests for the allocation of Local Green Spaces, as included in the National Planning Policy Framework.
- 1.5 RPS also raises a number of concerns with the Plan, relating to the ability of the Draft BNDP to meet the basic conditions set out in the Town and Country Planning Act. As indicated within the response to the Draft BNDP, RPS raises a number of concerns in the way that the Parish Council has arrived at the preferred options for the Plan, which has disregarded important sources of evidence to inform the plan and has failed to assess suitable alternative options to key proposals in the document.
- 1.6 The following sections of this response go into these areas in more detail, though ultimately, RPS considers that the Draft BNDP at its core is imbued with erroneous assertions and a lack of credible supporting evidence. The Draft BNDP if adopted would not deliver upon sustainable aims but instead frustrate new development, contrary to the aims of the higher tier Herefordshire Core Strategy: Local Plan.
- 1.7 RPS cannot endorse the Draft BNDP and would strongly recommend that the Inspector does not progress the Draft BNDP to Referendum, in whole, or without substantive recommendations to the Plan.

## 2 GENERAL APPROACH TO THE NEIGHBOURHOOD PLAN

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### Creation of a Flexible and Resilient Plan

- 2.1 It is the role of the Examination to establish whether the Draft BNDP meets the basic conditions set out in the Town and Country Planning Act 1990<sup>1</sup> which are:
- a) having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan);
  - b) having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order. This applies only to Orders;
  - c) having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order. This applies only to Orders;
  - d) the making of the order (or neighbourhood plan) contributes to the achievement of sustainable development;
  - e) the making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area);
  - f) the making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations; and
  - g) prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan).
- 2.2 These basic conditions should be read within the context of paragraphs 16 and 184 of the National Planning Policy Framework (NPPF) which requires that Neighbourhood Plans support the strategic development needs set out in higher tier Local Plans and set out policies for positive growth in their area.
- 2.3 This means that the Draft BNDP should be drafted to in accordance with the strategy of the Herefordshire Local Plan: Core Strategy (HLP) and should not plan to frustrate the objectives of this plan. RPS would therefore expect an emerging NDP to include sufficient flexibility so that it can respond to evidence which may lead to increases in housing need which will allow the BNDP to endure the plan period up to 2031. The Draft BNDP therefore needs to present an honest reflection about how it presents its housing requirement and the means in which it can be achieved.

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<sup>1</sup> Paragraph 8 (1 and 2) of Schedule 4b, Town and Country Planning Act 1990 (as amended)

### **Evidence Led Approach**

- 2.4 RPS advocates a transparent and evidence led approach, which will enable the objective assessment of the Draft BNDP. In doing so, it will be clear how decisions have been arrived at, how evidence has influenced the plan and how the findings of the Environmental Report supporting the Draft BNDP have been accounted for.
- 2.5 In doing so, the Draft BNDP should demonstrate that it satisfies the requirements of the SEA Directive<sup>2</sup> through the assessment of reasonable alternative options, which are informed by credible and robust evidence to ensure the validity of the process.

### **Neighbourhood Plan Objectives**

- 2.6 The Draft BNDP includes a set of objectives that are linked to evidence drawn from the context of the Plan and input from local residents as part of the consultation process. The Draft BNDP proposes 12 objectives, linked to the policy areas included within the plan, ranging from housing requirement, employment, open space and renewable energy.
- 2.7 In relation to housing, it is noted that the BNDP seeks to meet the housing requirement set in the (HLP), which includes identifying land required for new development and define the extents and location of built development over the plan period.
- 2.8 RPS supports the delivery of these objectives and considers that the policies proposed to deliver these aims are scrutinised to ensure that they can be delivered in a way that does not compromise the HLP.
- 2.9 Comments provided by RPS within this response address concerns related to the policy approach which are considered to frustrate the delivery of these objectives and should therefore be revisited through examination.

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<sup>2</sup> Article 5 (1) of Directive 2001/42/EC (the *SEA Directive*)

### 3 POLICY BNDP1: DELIVERING NEW HOMES

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#### **Delivering Herefordshire's Growth Requirements**

- 3.1 The housing need for Herefordshire is derived from the 2015 Herefordshire Local Plan (HLP), which covers the need over the period 2011-2031. Policy SS2 of the HLP identifies a minimum need for 16,500 dwellings over this period, of which 40% is proposed for Hereford City, 28% to the main towns and 32% to the rural settlements. For the rural settlements, this equates to a minimum of 5,300 dwellings, which are proposed to be delivered to a number of settlements in accordance with the hierarchy established in Policy RA2 of the HLP.
- 3.2 The Draft BNDP translates this into local need through the Draft Policy BNDP1, which presents a minimum growth target of at least 71 dwellings over the period 2011-2031. The justification for this quantum is included within Annex F of the Draft BNDP, which plans for a minimum rate of growth based on a 15% increase in the size of both Bodenham Moor and Bodenham.
- 3.3 In order to calculate the future requirement for the settlements in the Parish, Annex F of the Draft BNDP also includes a list of commitments/completions which presents a figure of 72 dwellings. On this basis, the Draft BNDP takes the view that the completions and commitments to date meet the figure of housing need consistent with Policy SS2 of the HLP. As this is a minimum figure, the Draft BNDP includes a further windfall allowance of 57 dwellings, based on an assessment of developments over the past 15 years.
- 3.4 RPS does not agree with the calculation of the BNDP requirement and supply, which does not give confidence that the housing requirements of the HLP can be fulfilled.

#### **BNDP assessment of Development in Bodenham Moor**

##### *Requirement*

- 3.5 The assessment of housing need presented by the Draft BNDP is expressed as a proportion of the total number of households in the Parish. Table 2 of Annex F indicates that there is a need for 71 dwellings in Bodenham Moor and Bodenham. This is calculated on the requirement for 15% of the total dwellings in Bodenham Moor and Bodenham as a minimum requirement.
- 3.6 This follows a broadly similar approach towards the application of Policy RA2 of the HLP which was presented as part of the Planning Officers Report for the application at Land South of Chapel Land (paragraph 6.5 of **Appendix 2** refers). Where this deviates however is that the Parish Council has taken a view on the housing stock in the Parish, which differs from the evidence in the Planning Officer's report and Herefordshire Council's 2013 Rural Housing Background Paper.

##### *Supply*

- 3.7 The Draft BNDP includes an assessment of housing commitments and completions in the BNDP area from 2011 (Table 1 of Annex F), aligning with the start of the BNDP plan period. As part of this list, the assessment is made that there are 72 dwellings which have either been completed or are under construction/extant since 2011. RPS does not agree with this calculation.

3.8 The supply figures in Annex F of the Draft BNDP include a number of uses that should not be included within the supply. These are detailed below:

- Bodenham Moor – 53 dwellings
- Bodenham – 11 dwellings
- Elsewhere – 8 dwellings

3.9 This assessment makes no distinction between those sites completed, extant or under construction and assumes that all of the sites yet to be completed will come forward. Importantly, RPS has concerns over relying on information sourced locally, as this may not align with the data collected for Herefordshire by the Council. The Draft BNDP cannot assert that housing need has been met in Bodenham if the numbers proposed do not align with the Council's own figures.

*Herefordshire Council Data*

3.10 In order to present a consistent baseline, data from Herefordshire Council should be used. The Council monitor housing permissions and completions and keep an up to date trajectory of how the Council is performing against the overall requirement for new growth. There is no evidence that the BNDP has incorporated this data into their evidence base.

3.11 An up to date position has been obtained from Herefordshire Council in support of this submission, which includes housing completions and permissions from April 2011 to March 2016. This information is recorded on an annual basis and completions from April 2016 onwards have yet to be recorded.

3.12 The full data for Bodenham Parish is replicated as part of **Appendix 3**, though in summary this identifies:

- 1 Completion (April 2011-March 2016); and
- 59 Permissions (April 2011-March 2016)

3.13 One of these permissions relates to the single completed unit which when accounted for presents a total of 58 possible units recorded for the Parish since the start of the plan period in 2011. This is already indicating a difference of 14 dwellings from the list of dwellings recorded in the Draft BNDP.

3.14 The figures in the Draft BNDP do refer to a further approval in Bodenham Moor in June 2016 (P151651/F) which will not have been captured by Herefordshire Council's data. In the interests of certainty, RPS has added these 3 dwellings to the list of commitments in **Appendix 3**, taking the number of completions and commitments to 61.

3.15 RPS would advocate the use of the figures provided by Herefordshire Council as a more stable set of data, which is consistent with the approach to housing monitoring in the County. This does not however represent the full number of permissions that should be included in the Draft BNDP. A number of adjustments need to be made to this list to reflect the sites that the BNDP can include as part of the assessment.

- 3.16 RPS raises concern over the inclusion of sites outside of Bodenham Moor and Bodenham (open countryside) within the supply of sites. As indicated in **Appendix 3**, this equates to the 1 completed dwelling and 7 dwellings extant/under construction. Though RPS has no objection to including these sites within the overall supply of dwellings to meet Herefordshire's targets, these completions should not be counted towards the requirement for Bodenham Moor and Bodenham. It is clear from the reading of Policies RA1 and RA2 of the HLP, that the proportionate growth targets for the rural areas are concerned with development within or adjacent to existing settlement boundaries. The policy did not intent to see a further proliferation of isolated rural dwellings that would be set apart from the wider principles of sustainable development. The proportional growth rate is applied to settlements only and on this basis, developments in the open countryside should not count against this target. It is therefore proposed that the 8 dwellings recorded in the open countryside are not recorded against the overall supply. Following this, the Draft BNDP should only record the following:
- 0 Completions (April 2011-March 2016); and
  - 54 Permissions (April 2011-March 2016)
- 3.17 This presents a figure of 54 permissions within Bodenham Moor and Bodenham which can be considered against the BNDP policy framework. The final judgement to be made is to establish the deliverability of these sites and whether they can be expected to come forward within the plan period.
- 3.18 In presenting policies for the supply of housing, RPS would expect that a similar level of scrutiny was applied to the BNDP that is reflected in the HLP. At the time of submitting this response, the latest decision to consider Herefordshire's approach to calculating the supply of housing is set out in the Planning Appeal recovered by the Secretary of State at Bartestree<sup>3</sup>.
- 3.19 As part of this Appeal, the Appellant made an assessment of Herefordshire's housing land supply, challenging the Council's proposed supply of 5,715 dwellings, established in the Appellants Proof (Excerpt included in **Appendix 4**), presenting instead a supply of 4,140 dwellings. Part of the reduction in this assessment of supply involved the delivery assumption that not all of the proposed sites in the Council's supply will be delivered as planned. These may lapse, stall or fail to be delivered altogether. The Appellant proposed that a 10% deduction was made to the commitments to address this uncertainty in the planning process. This, along with other amendments proposed by the Appellant led to a reduction in the housing land supply from 5.0 years to 3.63 years, which was endorsed by the Inspector (paragraph 27 of **Appendix 5**) and remains the most up to date evidence on the position. As part of the appeal proceedings, the Council also confirmed that they agreed with this position, accepting the principles which led to this reduction.
- 3.20 RPS considers that the Draft BNDP is not sufficiently flexible in this regard should the permissions in the BNDP not come forward as expected. An appropriate mechanism to deal with this would be to use the approach now adopted by Herefordshire Council, which would introduce a 10% buffer on the committed development. Applying this to the relevant permissions in Bodenham Moor and Bodenham, this would reduce the overall number from 54 permissions to

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<sup>3</sup> APP/W1850/W/15/3051153 Land at Longworth Lane, Bartestree (Decision issued 26 October 2016)



49 permissions. This, RPS finds, is a more appropriate basis for approaching the housing supply in the emerging BNDP.

- 3.21 Set against the requirement of 71 dwellings in the village, this would leave an additional 22 dwellings to be found in order to satisfy emerging Policy BNDP1 of the neighbourhood plan in a way which is consistent with Policy RA2 of the HLP.
- 3.22 In addition to windfall development (identified as 57 dwellings in category G of Table 2, Annex F), the BNDP needs to plan for a further 79 dwellings within the plan period.
- 3.23 Consideration of the proposed settlement boundaries is offered as part of section 4 of this response, however RPS has concerns whether this level of need can be met within the identified settlement boundaries.
- 3.24 In order for the emerging BNDP to be consistent with the strategic plan in Herefordshire District, RPS recommends that the Council should also apply the same principles as Herefordshire which includes the provision of a 10% buffer to ensure flexibility in the supply. This has not been done and as such, the BNDP is inconsistent with the HLP.

#### **BNDP potential land options assessment**

- 3.25 In terms of the consideration of potential sites for future housing, Policy RA2 of the HLP states that:

***“Neighbourhood Development Plans will allocate land for new housing or otherwise demonstrate delivery to provide levels of housing to meet the various targets, by indicating levels of suitable and available capacity”***

- 3.26 In response to this, the Council has prepared a supplementary study<sup>4</sup> to consider potential housing land that is “suitable to meet new housing requirements” (paragraph 1 refers). This document claims to draw on a number of sources, including Strategic Housing Land Availability (SHLAA) reports from 2009 and 2015, assessing these options using criteria set out in paragraph 3.1 of the study.
- 3.27 As indicated elsewhere in this response, RPS finds that this evidence is not fit for purpose in guiding the direction of the BNDP. RPS does not consider that this assessment has considered how new housing will be delivered through the BNDP and the Plan has taken an overly restrictive approach to new growth in the Parish.

#### **Sustainability of Bodenham Moor**

- 3.28 Policy RA2 identifies Bodenham Moor and Bodenham as key settlements in Herefordshire and identifies the Settlements of Bodenham Moor and Bodenham as settlements capable of accommodating proportionate growth in the Bromyard HMA (Figure 4.14 refers). Twelve settlements are included within this table for Bromyard, recommending that proportionate housing growth will be supported within and on the edge of these settlements.

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<sup>4</sup> Potential Housing Land in Bodenham Neighbourhood Area: Consideration of Options and Reasoned Assessment

- 3.29 What this table does not do is make a distinction over which of these settlements are more or less capable of delivering sustainable growth to contribute towards the overall housing need set out in Policy SS2 of the HLP.
- 3.30 As part of the evidence base for the HLP Examination, Herefordshire Council published the Rural Housing Background Paper in 2013. This includes an assessment of each of the twelve settlements included for proportionate development in Policy RA2 of the HLP, an excerpt of which is included in **Appendix 6**. This indicates how each of the villages have been selected, accounting for settlement size, provision of services and planning constraints. Of the sites on the list Bodenham Moor is ranked the highest scoring village in Bromyard HMA, with the largest provision of services and a settlement size over double of the next largest village.
- 3.31 Whilst Policy RA2 of the HLP remains flexible enough to deliver growth in each of the settlements listed in Figure 4.14, it is clear that some settlements present greater opportunities for sustainable growth than others. For example, Figure 4.14 includes villages such as Burley Gate, a village of 52 dwellings. Whilst it is served by local facilities, there will be limited opportunities for growth that can deliver meaningful sustainable growth including affordable housing provision.
- 3.32 From this assessment it is clear that Bodenham Moor is the most sustainable village in the Bodenham HMA, which should be a consideration as part of the BNDP in respect of the ability of the HLP Policy RA2 villages to meet the overall housing need set by HLP Policy SS2.

## 4 POLICY BNDP2: SETTLEMENT BOUNDARIES

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- 4.1 In the text preceding Policy BNDP2, the Draft BNDP correctly identifies that Bodenham and Bodenham Moor are identified in Policy RA2 of the Herefordshire Local Plan as settlements to receive proportionate sustainable growth. To deliver this Policy, the Draft BNDP indicates that Bodenham and Bodenham Moor need defined boundaries to identify their limits and define where the restrictive countryside policies of the Local Plan apply (paragraph 4.1 of the Draft BNDP refers).
- 4.2 RPS does not consider that the Draft BNDP has correctly established what Herefordshire Council intended through Policy RA2, which indicates that housing growth will be supported in or adjacent to the settlements identified in the Policy. Indeed, the supporting text to the Local Plan policy indicates that development should be located within or adjacent to the main built up areas to ensure that isolated, non-characteristic development does not arise (paragraph 4.8.16 refers). If it were the intention of the Local Plan to oversee the introduction of settlement boundaries, this should be done in a way which considers the need for potential housing sites adjacent to the settlement boundaries in the BNDP, to avoid further development in isolated areas of the Parish.
- 4.3 Herefordshire Council offers further guidance on proposing settlement boundaries, published as part of the Herefordshire Neighbourhood Planning Guidance Note 20<sup>5</sup>. The first page of text in this guidance document includes a summary of the advantages and disadvantages of proposing a settlement boundary as part of a BNDP. The Guidance Note advises that whilst settlement boundaries can offer certainty, done incorrectly, they can be crude and inflexible. Importantly, under the 'advantages' of a settlement boundary, the guidance suggests that BNDPs can ensure a more plan led approach to future housing growth, allowing for the allocation of sites over a windfall approach. The Draft BNDP has not planned positively for future growth and despite identifying potential options for future housing allocations none have been included within the proposed Plan. Instead, the windfall growth target for Bodenham Moor and Bodenham is expected to be met within the tightly drawn settlement boundary. For Bodenham Moor, this has only been adjusted from that of the former UDP settlement boundary (**Appendix 7**) to reflect committed growth in the village.
- 4.4 What the BNDP has not done is consider the potential that future growth may be required in the parish which should be directed towards Bodenham Moor and Bodenham in the first instance. The BNDP cannot therefore be seen to be sufficiently flexible to respond to any new evidence of housing need and is not capable of enduring the Plan period up to 2031.
- 4.5 The need for flexibility in the BNDP process has been recently confirmed through the Planning Appeal at South of Ford Lane, Yapton, the decision for which was recovered by the Secretary of State. The Secretary of State's Report on this Appeal was published on 13 September 2016<sup>6</sup> which involved the consideration of policies in the adopted Yapton BNDP and the implications for development arising from the emerging Arun District Local Plan.

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<sup>5</sup> Guide to Settlement Boundaries (revised January 2014)

<sup>6</sup> Land to the South of Ford Lane, Yapton (APP/C3810/A/14/2228260)

- 4.6 One of the key issues in the Appeal was the consideration of adopted BNDP Policy BB1, concerned with the permission of development outside of the built up area boundary. The Appeal considered the weight that could be given to BNDP Policy BB1 in light of uncertainty surrounding the housing need of Arun District. The Inspector for the Secretary of State held that weight could be afforded to Policy BB1 on the basis that the boundary included sufficient flexibility that it could respond to potential uplifts in the housing need in the District. As illustrated on the Proposals Map in the Yapton BNDP (**Appendix 8**), this includes land beyond the proposed allocations, which would provide additional opportunities for growth within the settlement boundary.
- 4.7 This same level of flexibility does not exist in the Draft Bodenham BNDP, the boundary for which includes very few opportunities for additional growth should future evidence determine a higher level of housing need in Herefordshire or a need to address any shortfalls that accrued in the County. The Herefordshire Local Plan is by no means an old document, having been adopted in October 2015. Despite this, the Council is already displaying difficulties maintaining a five year supply of deliverable housing against the Councils housing requirement. Rather than close the door on flexibility, the BNDP needs to build flexibility into the Plan, which will allow it to respond to unmet need in the County and assist the Council in addressing shortfalls in housing delivery. The BNDP should therefore take the lead from Policy RA2 of the HLP which states:
- “Neighbourhood Development Plans will allocate land for new housing or otherwise demonstrate delivery to provide levels of housing to meet the various targets, by indicating levels of suitable and available capacity”***
- 4.8 The Draft BNDP does not include such an assessment and is instead reliant on windfall sites to allow the village to meet the minimum growth targets set by Policy SS2 of the HLP.
- 4.9 The Parish Council may be aware that in the past 12 months guidance has been reintroduced into the online National Planning Practice Guidance (PPG). Concerning planning obligations, the PPG makes clear (paragraph 031-20160519 refers) that affordable housing contributions should not be sought on sites less than 10 dwellings, to encourage small scale and self-build development. Whilst this is a positive move to remove barriers to delivery of smaller schemes, this does impact on the provision of affordable housing that can be generated from new schemes. This is also accounted for in Policy H1 of the HLP. The windfall led strategy for the BNDP would fall under this site threshold, preferring piecemeal development over plan led approach to strategic growth. This policy would not be able to derive any additional affordable housing and as a result would deliver less social benefits in comparison to an allocations led strategy. This is a significant consideration which has not been taken into account as part of the windfall strategy.
- 4.10 In light of the Yapton Decision, RPS considers that there is a need for additional sites adjacent to the settlement boundary is to ensure that the BNDP is sufficiently flexible and capable of enduring throughout the plan period up to 2031. The identification of such sites need to be guided by evidence of site suitability and deliverability. The best resource available to the BNDP in this regard is the evidence base prepared by Herefordshire Council, particularly the Strategic Housing Land Availability Assessment (SHLAA).

## 5 POLICY BNDP3: MIX, TYPE AND TENURE OF NEW HOUSING DEVELOPMENT

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- 5.1 The supplementary text preceding this policy frames the Parish Council's intention to deliver an affordable housing policy which sets out levels of affordable housing expected in the Parish. Here, reference is made to the Herefordshire Council's affordable housing targets and the current levels of affordable housing need which are noted will change over time.
- 5.2 The actual policy however is more loosely worded than this, covering market and affordable housing. This indicates that application must include details of the mix, types, sizes and tenures to meet local housing requirements and include affordable housing to comply with HLP Policy H1 – Affordable Housing. The Policy needs to be clear that this relates solely to affordable housing and needs to understand the difference between outline and full planning schemes and the appropriate level of detail that can be submitted at each stage.
- 5.3 One of the key sentences here is 'local housing requirement'. RPS recognises that this phrase is often used to relate development to affordable housing and understands that this is the intention of the policy. What the policy should not do is try and frustrate the delivery of market housing in the parish and there are no national standards in this regard relating to types and sizes. This should be clarified along with the removal of the reference to local housing requirements.
- 5.4 RPS considers that although poorly worded, the intentions of Clause 1 of BNDP3 seek to inform the provision of future affordable housing and if this is the case, the framework for this policy already exists as part of the higher tier HLP. An additional policy on this matter is therefore duplication and unnecessary for the purposes of policy formation.
- 5.5 Clause 2 of the policy indicates that proposals for affordable housing should be located within settlement boundaries of Bodenham and Bodenham Moor. RPS considers that this policy should not be limited to affordable housing and principles should be prepared to identify proposals for market housing on the edge of the key villages. Paragraph 5.6 of the Draft BNDP identifies a current need (as of 2014) for 10 further affordable houses in the Parish, 8 of which are for affordable purchase. As the Parish Council will be aware, the Government has changed its stance on affordable housing contributions (cite PPG), which advocates that affordable housing should only be applied to schemes of 10 or more. This will be beneficial for the small housebuilding industry, though this will not benefit the delivery of affordable housing and it is unlikely that the policy approach undertaken by the Draft BNDP will deliver any further affordable housing. The BNDP needs to recognise the benefits of delivering market housing which can support the delivery of affordable housing as a benefit to development. This can only be requested on schemes of 10 or more and RPS recommends that in order to meet the current and future affordable housing need in the Parish, further site allocations are introduced into the BNDP.
- 5.6 Clause 3 of this policy relates to the monitoring of local housing need, citing a review of the plan if local needs are not being met. This policy lacks any certainty or clarity on the exact conditions to trigger a review and how the issue might be resolved. Rather than include a policy for the early review of housing, it would be more prudent to address any signals of housing need at this

juncture and avoid another lengthy plan review process. As indicated above, RPS recommends that additional housing allocations adjacent to Bodenham Moor can achieve this and this approach will provide a higher degree of safeguarding than the plan currently offers.

## 6 POLICY BNDP 4: FLOOD RISK AND DRAINAGE

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- 6.1 This policy provides a similar policy framework to that expressed in HLP Policies SD3, SS7 and SD4 and again, it is unclear what new information the policy brings that is not already addressed in the HLP.
- 6.2 The supporting text to the policy is helpful in this regard, indicating at paragraph 6.5 that there is no foul water capacity for Bodenham, suggesting that new schemes will have to come forward using private septic tanks as an alternative means of dealing with foul water. This is by no means a preferable solution and this evidence should have been incorporated into the plan making process to inform the hierarchy of new development locations. This environmental constraint will limit the ability of housing schemes in Bodenham, which places greater emphasis on Bodenham Moor as a location for new growth and this information should inform Policy BNDP1, placing Bodenham Moor as the principal settlement for new growth.

## 7 POLICY BNDP 6 LOCAL COMMUNITY FACILITIES

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- 7.1 This policy seeks to protect existing community facilities, support new proposals and generate funds locally to contribute towards existing schemes in the BNDP plan area. RPS generally supports the Parish Council's intention to support and protect the existing services and facilities in the Parish, though concern is raised in relation to the means of appropriating funds for these items.
- 7.2 Clause 3 of this policy includes a requirement for developer contributions to be used for four specific schemes. Paragraph 7.6 of the Draft BNDP indicates that contributions will be sought via Section 106 agreements and/or Community Infrastructure Levy (CIL) to provide for these schemes. RPS does not consider that, in the main, Section 106 is an appropriate mechanism to secure these contributions as other than Clause 3b, these schemes relate to upgrades that are unlikely to relate to new development. Section 106 contributions can only be sought where they are directly related to the development; necessary to make the development acceptable and; are fairly and reasonably related to the development (paragraph 25-094-20140612 of the PPG refers). Other than Clause 3b, the other items on this list do not relate to this and cannot be enforced through contributions.
- 7.3 These items can be contributed to as part of CIL contributions and with a Neighbourhood Plan in place, the Parish will be able to secure 25% of CIL receipts. Presently, this policy is not compliant with national and local policy and does not meet the basic conditions required to proceed to Referendum.
- 7.4 RPS recommends that this policy is amended to separate out items relating to schemes compliant with Section 106 contributions and which should be met through CIL contributions. As identified by RPS, the majority of schemes listed in Draft Policy BNDP6 are considered to be CIL schemes, as these relate to upgrades beyond the remit of making new developments acceptable.



## **8 POLICY BNDP 7: PROTECTING LANDSCAPE AND IMPORTANT PUBLIC VIEWS**

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- 8.1 Comments related to this policy will be addressed as part of a technical appendix, to be submitted further to this statement, within the Parish Council's agreed consultation period ending on Sunday 20 November 2016.

## **9 POLICY BNDP8: LANDSCAPE DESIGN PRINCIPLES**

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- 9.1 Comments related to this policy will be addressed as part of a technical appendix, to be submitted further to this statement, within the Parish Council's agreed consultation period ending on Sunday 20 November 2016.

## **10POLICY BBDP9: PROTECTION OF LOCAL CHARACTER**

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- 10.1 Comments related to this policy will be addressed as part of a technical appendix, to be submitted further to this statement, within the Parish Council's agreed consultation period ending on Sunday 20 November 2016.

## 11 POLICY BNDP10: OPEN SPACES

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11.1 Policy BNDP10 of the Draft BNDP proposes the allocation of Local Green Spaces (LGS) to be granted restricted status for development, unless very special circumstances arise which outweigh the need for their protection. The policy also indicates that proposals resulting in the loss of other public open space will also not be permitted.

11.2 The policy refers to LGS sites listed in Annex C which includes seven sites illustrated in Appendix 1 of the Draft BNDP and replicated below:

### *Bodenham Moor*

1. Car park and tennis courts adjacent to Parish Hall, together with parcel of land to the east;
2. Grassland north east of the GP Surgery;
3. Bodenham Moor village green;
4. Land south of Chapel Lane, known as 'Shukers Field'.

### *Bodenham*

5. Village green;
6. Field opposite war memorial; and
7. Lady close orchard and Bodenham lake.

11.3 Annex C also includes details of each of these proposals, including the proximity to the village and the Parish Council's determination of special qualities or local significance which justify the designation.

11.4 In the supporting text to the policy, the Draft BNDP states that the former 2007 Unitary Development Plan (UDP) identified sites for protection as open areas/green spaces and this protection should be continued through the BNDP (paragraph 8.10 refers). As illustrated in **Appendix 8**, the UDP offered protection for one site as an *Open Area and Green Space* (identified as Site 2 in the Draft BNDP) and two sites safeguarded as *Open Space and Allotments* (identified as part of Site 1 and Site 3 in the Draft BNDP). The current BNDP proposals deviate from this process, in that rather than identifying

### **National or Local Policy and Guidance**

11.5 The justification for including LGS sites emerged within the NPPF in 2012, which outlines the ability for Local Plans or Neighbourhood Plans to identify such sites. The NPPF is clear that the provision of LGS sites should be consistent with the local planning of sustainable development and should complement the investment of sufficient homes, jobs and other essential services (paragraph 76 refers).

11.6 Paragraph 77 of the NPPF is clear that the designation of Local Green Spaces will not be appropriate for most green areas or open space and thus should not be applied liberally or

without justification. In this regard, the same policy of the NPPF is explicit in the particular justifications that a Local Plan or Neighbourhood Development Plan would need to satisfy in order to allocate a LGS. Three tests are provided as part of paragraph 77, which are:

- The green space is in reasonably close proximity to the community it serves;
- The green space is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value, tranquillity or richness of its wildlife; and
- The green area concerned is local in character and not an extensive tract of land.

11.7 The NPPG offers further clarification on this matter (paragraph 37-007-20140306 refers), noting that BNDPs need to be consistent with planning for sustainable local need and the designation of LGS sites should not be used in a way that undermines this aim of plan making (RPS emphasis).

11.8 The NPPG confirms (paragraph 37-019-20140306 refers) that LGS sites do not need to be in public ownership, however the qualifying body should contact the landowners at an early stage about proposals to designate any part of their land as a LGS. This has not been undertaken as part of this plan making process.

11.9 LGS is a restrictive and significant policy designation which, in the context of the NPPF, requires a management consistent with the policy approach for the Green Belt. From this overview of the policy context it is clear that the designation of LGS sites is not appropriate in most cases and should not be used lightly.

11.10 Importantly, LGS designations should not constrain the ability of delivering sustainable development and should be informed by robust evidence to meet the tests set out in paragraph 77 of the NPPF.

#### **Local Evidence**

11.11 In order to for LGS sites to be included within the BNDP, there needs to be demonstrable evidence that the sites proposed meet the paragraph 77 tests of the NPPF.

11.12 The evidence presented by the Parish Council in this respect is included within Annex C of the Draft BNDP, which includes an assessment of each of the proposed sites set against a category listed as '*Special Qualities/Local Significance and Character*'.

11.13 This terminology is inconsistent with thrust of paragraph 77 of the NPPF and as a consequence does not provide a meaningful assessment of whether any of the sites proposed should be allocated as LGS sites.

11.14 Beyond the guidance provided by the NPPF and NPPG, additional clarification on the examination of LGS sites can be understood from recent examples of BNDPs elsewhere in the country. The issue of LGS sites was one of the issues for consideration by the Inspector appointed to examine the Swanwick BNDP. As part of Policy 2 the BNDP proposed three areas of land to be designated as open land adjacent to the village of Swanwick. The Inspector's Report to this BNDP (**Appendix 9**)

- 11.15 further clarification on how Local Green Space should be scrutinised has been the subject of a recent Examination as part of the Swanwick Neighbourhood Plan.
- 11.16 In April 2016 the independent Planning Inspector reported on the compliance of the BNDP to meet legal requirements and satisfy the 'basic conditions' set out in law following the Localism Act<sup>7</sup>. This considered the proposed sites under Policy 2 against the framework for assessing LGS sites. In his assessment, he refers to the three tests of Paragraph 77, noting that all three need to be satisfied in order for a site to be considered as a LGS.
- 11.17 The Inspector goes on to qualify (third paragraph of page 19) that whilst the BNDP stated that the sites held an *intrinsic value*, no substantive evidence was provided to demonstrate that the areas of land held a particular significance (for reasons of beauty; historic significance; recreational value; tranquillity or richness of wildlife). Additionally the Inspector was not convinced that the proposed sites were indeed proposed as LGS.
- 11.18 Taking this into consideration, the Inspector determined that the Policy did not fulfil the requirements of Paragraph 77 of the NPPF and did not meet the basic conditions. As a result of this, the Inspector recommended the deletion of Policy 2 which, alongside other recommendations, was required in order for the plan to proceed to Referendum.
- 11.19 As indicated above, the Draft Bodenham BNDP is not supported by any evidence of this nature which justifies why each of the proposed sites meet the three tests of Paragraph 77. Without demonstrable evidence for the inclusion of the LGS sites, RPS does not consider that the Draft BNDP satisfies the basic conditions and, on this basis, the sites should be recommended for deletion.

### **Alternative Assessment of Local Green Space Proposals**

- 11.20 As indicated above, the assessment of LGS sites within the Draft BNDP has not been undertaken in accordance with the NPPF and the NPPG and does not satisfy the basic conditions required for a BNDP to proceed to public Referendum. The Draft Bodenham BNDP falls foul of the same issues raised as part of the Swanwick BNDP Examination, which resulted in the recommended deletion of the policy for allocating open spaces.
- 11.21 In response to this RPS has considered each of the LGS sites proposed in the Draft BNDP against the criteria listed in paragraph 77 of the NPPF, having regard also to paragraph 76 which requires that the LGS sites should be capable of enduring beyond the end of the plan period. This assessment undertaken by RPS is enclosed as **Appendix 10**, the summary of which is replicated below:
- 1. Car park and tennis courts adjacent to Parish Hall, together with parcel of land to the east*
- 11.22 This proposed site includes recreational facilities associated with the Parish Hall, including tennis courts and a car parking area. There is a further parcel of land submitted south of the tennis courts which is currently used for small hold agricultural use.
- 11.23 In terms of the site's potential as a LGS, the assessment made by RPS indicates that whilst part of the site does contribute towards recreational benefits to the village, it is poorly located to the

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<sup>7</sup> Paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990

core functions of the village and does not contribute towards the local character of the village. It is noted that part of the site (relating specifically to the tennis courts) were previously identified as an area of safeguarding for open space and allotments, however this did not cover the area now identified by in the Draft BNDP, which includes a car park and adjacent grazing land. These areas were not previously included in the UDP and do not bear any correlation with the tests of a LGS included in the NPPF.

11.24 The Council's evidence (Annex 3 of the Draft BNDP) indicates that this site is the only publicly owned social and recreation facility in the Parish. Whilst RPS does not dispute this, this does not provide sufficient justification against the tests of the NPPF.

11.25 It is therefore questionable whether the BNDP should be using powers to identify this site as a LGS, as it does not conform to the tests in the NPPF. The NPPF states that the LGS designation is not appropriate for most green areas or open space (paragraph 77 refers) and RPS consider that this is the case for this site.

### *2. Grassland north east of the GP Surgery;*

11.26 The Draft BNDP proposes to include a small area of grassland within the supply of LGS sites which is located behind the Bodenham Moor GP Surgery. This land is owned by Herefordshire Council, who manages the site and maintains the three trees on site.

11.27 There are no public facilities on this site, no rights of way or any marked access routes. The Council's evidence claims that this is essential to the character of the heart of the village. Whilst RPS notes that this is one of the few undeveloped areas of green space in the village, the Council has not provided any justification to demonstrate this fact.

11.28 As the BNDP notes, this site is owned by Herefordshire Council and as such, the site is already offered a level of protection through the democratic process. For the Council to release the land for anything other than its current use, it would need to go through internal cabinets, involve local members and potentially undertake consultation. The BNDP needs to establish exactly why it wishes to designate this site as a LGS. If it is to protect the site from development, RPS considers that public ownership already offers a level of protection, which makes the LGS designation unnecessary.

### *3. Bodenham Moor village green;*

11.29 The Bodenham Moor village green is also under public ownership, albeit covering a larger area than the green space adjacent to the GP Surgery. The site includes a children's play area and park benches.

11.30 As indicated in the evidence submitted alongside this response (**Appendix 10**), the village green offers recreational benefits to the village and, located in the centre of the village, does contribute towards the character of the settlement. The site is also owned by Herefordshire Council and as such the village green is offered a level of protection through these means. A LGS designation would not be appropriate.

*4. Land south of Chapel Lane, known as 'Shukers Field'.*

- 11.31 RPS has been involved in promoting this land on behalf of Bovis Homes which was presented to Herefordshire Council as a planning application in 2015. An assessment has been made over whether the site contributes towards all of the three tests of the NPPF (paragraph 77).
- 11.32 The assessment of the site provided by RPS (**Appendix 10**) indicates that the site does not hold any local significance as a LGS other than the proximity to the village, which is by itself not enough to justify the designation of the site as a LGS.
- 11.33 The site is currently managed for agricultural purposes and does not serve any functions to the local community and does not enrich the local character. Indeed, the planning proposal submitted by Bovis in 2015 included an area of public open space and a Children's play area, which may have provided some basis for consideration, however the Draft BNDP has considered the site on its current value.
- 11.34 The assessment of the site made by the Draft BNDP (Annex C) indicates that the site makes a significant contribution to public amenity by virtue of its open space/rural character, provides relief from the otherwise linear character to the south of the village and is critical in preserving the character and setting of the adjacent Grade II listed buildings.
- 11.35 RPS wholly disagrees with this conclusion. Should the Inspector observe the site, it is clear that the parcel of land proposed is enveloped by an existing hedgerow which bounds the site to the north and the east, obscuring views into the site. There are no public rights of way through the site, which is used solely for arable purposes and it therefore offers little in the way of public amenity, use or contribution to the character of the village.
- 11.36 Though other sites proposed as LGS in the Draft BNDP are not supported by any substantive and qualified evidence, this site has the benefits of the evidence base submitted as part of the application to Herefordshire Council in 2015 (reference). As evidenced within the supplementary Archaeological and Heritage Assessment supporting the 2015 planning application, there are no assets of historic importance within the site.
- 11.37 In response to this application (**Appendix 10**), the Officer's report submitted to members for consideration included responses from the Council's Conservation Manager covering both historic buildings and archaeology (paragraphs 4.7 and 4.12 refer). In summary, the Conservation Manager found that the development proposal was in compliance with Policy LD4 of the Herefordshire Core Strategy and Chapter 12 of the NPPF and subsequently no objections were raised.
- 11.38 It is therefore clear that the site fails to meet the NPPF tests of what a LGS site should be and the Draft BNDP is unjustified in the inclusion of the site.
- 11.39 Additionally, the NPPF is clear (paragraph 76 refers) that LGS sites should be capable of enduring beyond the plan period. As identified in Section 2, RPS is concerned that the Draft BNDP is not sufficiently flexible to meet any additional housing need arising in the County, some of which may be required in Bodenham Moor, as the largest village in the Bromyard HMA. The Draft BNDP does not correctly reflect the evidence base underpinning the Herefordshire Core Strategy which identifies this site as land with potential for residential development, reflecting its suitability for housing. There are no other identified sites of this scale in the village that could



meet additional need and therefore it would be inappropriate to designate this site as a LGS as this designation would not endure.

*5. Bodenham Village green;*

11.40 This small parcel of land includes a Grade II listed war memorial cross and a capped well feature. It does not meet any of the criterion necessary for LGS designation and is already safeguarded through the Grade II listing.

11.41 It is not considered that this site meets the tests required in order to allocate this as a LGS.

*6. Field opposite war memorial; and*

11.42 This is a privately owned parcel of land with little evidence of local recreational use and value to the local community. There are no provisions on the site or evidence that this site contributes to the character of the village. It is not considered that this site meets the tests required in order to allocate this as a LGS.

*7. Lady close orchard and Bodenham lake.*

11.43 This proposed LGS covers a significant space including Bodenham Lake nature reserve and an area of orchard to the east of the site. This site is used for recreational purposes by the youth sailing club and is noted area for local wildlife. As an existing local nature site, this site is already afforded a level of protection which would offer an appropriate level of safeguarding from development. On these grounds a LGS designation would not be appropriate.

**Summary**

11.44 The above information demonstrates that none of the sites identified in the Draft BNDP are capable of meeting the qualifying criterion identified in paragraph 77 of the NPPF. Some of the sites identified are already offered protection, through the local designations as nature sites, or contain Grade II Listed Buildings. This will ensure that these parcels of land are protected, though the other sites promoted in the BNDP, such as Land South of Chapel Lane, are not qualified by the same evidence and are not fit for allocation as a LGS.

## 12 SECTION 11 REVIEWING AND MONITORING THE PLAN

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- 12.1 This section of the Draft BNDP refers to the monitoring and review of the plan and includes a number of observations, including the possibility of increased need for housing during the lifetime of the plan period. These increases are expected as a result of additional demand for housing, arising from increases in population and movements in local house prices. In response to this, paragraph 11.2 proposes that a review is undertaken in 2021 to ensure that the details of the plan are kept relevant. Such an early review period does raise alarm with RPS as the plan is proposing a review within 4 years of adoption. The plan should be capable of enduring for at least the duration of the plan period up to 2031 and should make provisions to do so to avoid the lengthy process of plan review.
- 12.2 The Parish Councils evidence points towards inadequacies in the provision of housing as it is these means which form the principal issues for review. The BNDP should be sufficiently flexible that it can respond to any emerging evidence of housing need. RPS has already identified that the plan needs to make additional provision for housing and the evidence provided in this section compounds this need further. RPS therefore proposes that additional allocations are found adjacent to Bodenham Moor, as the most sustainable location in the Parish. Land south of Chapel Lane remains available to meet this need and evidence from Herefordshire Council identifies this site as the most sustainable location for growth. It is therefore recommended that this site is included within the BNDP to provide sufficient land for the extant housing need to be met and safeguard the BNDP to ensure an early review of the plan is not needed.

## 13 ENVIRONMENTAL REPORT

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- 13.1 The Parish Council has submitted an Environmental Report (ER) alongside the BNDP, which has been prepared by Herefordshire Council. This document includes an assessment of policies included in the Draft BNDP against environmental objectives transposed from the SEA Directive (Annex II (2) of 2001/42/EC).
- 13.2 As indicated in the report (paragraph 1.5 refers) the screening of the BNDP undertaken in 2014 identified that there may be significant environmental effects and consequently an SEA would be required.
- 13.3 Though Herefordshire Council's report has correctly identified the requirement for this report to be prepared, RPS has a number of concerns relating to the methodology and scope of the ER, which is not considered to meet the requirements of the SEA Directive. Clarification on these disputed areas is presented below.

### **Methodological approach**

- 13.4 RPS welcomes the initiative of Herefordshire Council in preparing this report, though remains concerned over the robustness of the approach and the subsequent findings that are derived from the ER.
- 13.5 In setting the SEA objectives and baseline characteristics, the ER indicates that development in the Parish will predominantly be via existing commitments and windfall development (paragraph 3.10 refers). The text goes on to say that the full impacts of the SEA Directive will be tested at the planning application stage when the full details of the location are known. This is quite a confusing stance from the Council as it suggests that the ER has purposefully delegated certain SEA objectives for a later time, instead of testing the full SEA Framework illustrated in the assessment of the Herefordshire Core Strategy. To make this statement prior to assessing the BNDP itself is somewhat of a fait accompli and does not recognise the importance of the SEA in identifying options that can lead to more sustainable outcomes.
- 13.6 What we are therefore left with is a partial SEA assessment, which focusses on a select number of SEA objectives relating to the environment, rather than the full suite of social, economic and environmental indicators. The SEA framework has therefore been skewed in favour of the environmental indicators which offer only one part of the three dimensions of sustainable development.
- 13.7 If Herefordshire Council are insistent that the BNDP is supported by a SEA compliant ER, this cannot be a cherry picked document of indicators as this undermines the credibility of including the report as part of the supporting evidence base. It is therefore paramount that the ER is revised to reflect the whole SEA Framework used by the Council so that it can be used as a means of fully understanding and appraising alternative options to the plan.

### **Assessing the NDP Options**

- 13.8 The ER includes an assessment of each of the Draft BNDP policies and objectives against the Council's SA framework. Notwithstanding comments made above on the lack of balance in the

proposed indicators, RPS also raises concern on now the appraisal of options in the ER has informed the Draft BNDP.

- 13.9 Section 5 of the ER points to nine spatial options which have been assessed as alternative growth strategies for the BNDP. These options relate principally to housing growth in the Parish, considering what the environmental impact would be to include further allocations for housing in Bodenham Moor and Bodenham. The outcome of this assessment is detailed as part of the table supporting paragraph 5.6.
- 13.10 Given the residential focus of these options, it is considered that a comparative assessment can be made against the scoring of Draft BNDP Policies 1 and 2, which are concerned with the delivery of new housing and the imposition of settlement boundaries to define the extents of new development.
- 13.11 The ES scoring of Policies 1 and 2 of the Draft BNDP is included in support of paragraph 6.5 of the document. For Policy BNDP 1, this indicates that relationship of the SEA objectives is unclear and that further information is needed. This is represented by blanket 'unknown' scores against the assessment of this emerging policy. In respect of the settlement boundary (Draft Policy BNDP2), the policy is found to be compatible with the SEA objectives. RPS is concerned by the scoring of the ER in respect of BNDP1, which is largely mirrored in the assessment of Objective 1 of the BNDP, which is to meet the housing requirements of the HLP. This tells us that there is uncertainty over the ability of the BNDP to deliver growth in line with the higher tier HLP – this information has come directly from Herefordshire Council. This is important, not only as this relates to other housing sensitive policies in the BNDP (such as Emerging Policy BNDP 2: Settlement Boundaries), but it suggests that there may be a potential conflict with the HLP. This is incompatible with paragraph 8 (2) (e) of the Town and Planning Act 1990 (amended), which requires general conformity with the Development Plan, which in this case is the HLP.
- 13.12 As indicated the options presented by the ER (Section 5 refers) includes nine alternative strategies to the proposed plan, which have reportedly been considered by the NDP steering group as part of the production of the BNDP (paragraph 5.1 refers).
- 13.13 The table supporting this assessment identifies two options which have the strongest correlation to the environmental objectives in the report, which are:
- Option 2: Allocate Sites for Housing; and
  - Option 4: Allocate Sites and Identify a Settlement Boundary.
- 13.14 The assessment of both of these options is awarded the same score, which is a mixture of strong and very strong compatibility scores with the ER. When taken against the scores of Policies BNDP 1 and BNDP 2, it is clear that either of these options would lead to a stronger correlation with the environmental indicators in this report. The findings of this report however, do not appear to have been taken into account.
- 13.15 Though Options 2 and 4 present different approaches, they share the common ground of the need to introduce additional allocations into the BNDP. The ER is clear in this regard that this would lead to moderate to significant effects in the context of the appraisal. Conversely, the ER indicates that the baseline position promoted through the Draft BNDP offers less certainty over

the positive effects for any growth as it does not allocate land for housing, instead relying on a criteria based policy (paragraph 5.4 refers).

- 13.16 It appears that the ER has been undertaken in isolation of the Draft BNDP, which makes little response to the fact that more sustainable options are identified through the ER, which casts doubt over whether the current proposals for a settlement boundary with no further allocations represent the most sustainable option for the Parish.
- 13.17 Paragraph 5.5 of the ER indicates that a settlement boundary for Bodenham Moor already existed and it was therefore logical to continue with this as a means of defining the growth area. For point of clarification, RPS bring to the Inspector's attention that settlement boundaries were included as part of the now largely superseded Unitary Development Plan (UDP). Settlement boundaries do not exist as part of the HLP and therefore it is entirely appropriate to reassess the view over whether they are appropriate to include within the assessment.
- 13.18 In this regard, there remains an inconsistency with the application of settlement boundaries for Bodenham Moor and Bodenham. The ER indicates that there can be greater certainty of the impacts of the BNDP if allocations are introduced into the Plan and the directions for growth are clearer. On the other hand
- 13.19 RPS content that the Draft BNDP fails to consider the most appropriate growth options for the Parish and would recommend that the BNDP is guided by the ER prepared in support of the Plan, which recommends that greater certainty can be introduced by allocating sites for housing as part of the Plan process.

#### **Further consideration of Options**

- 13.20 As noted above, the ER has considered high level spatial options for the plan, however it is unclear how this information has informed the plan making process of the BNDP.
- 13.21 Additionally, RPS notes that an assessment of the potential housing site options has not been considered as part of the ER or Draft BNDP. The Parish Council's information note on the consideration of housing options includes a review of three sites in Bodenham Moor and three sites in Bodenham. It is questionable that this forms an adequate baseline to consider reasonable alternatives, though there are still options available to the BNDP. These alternative options should, therefore, have been also appraised as part of the ER to determine how well each of the sites scored against the sustainability assessment which would contribute towards the site selection process.
- 13.22 RPS considers that there are serious implications arising from this decision, which draws on the findings of the recent challenge to the Henfield Neighbourhood Plan, the decision for which was handed on 13 October 2016<sup>8</sup>. The legal challenge (**Appendix 11**) was made to the emerging NDP on three grounds:
1. that the NDP had failed to lawfully assess reasonable alternatives to the spatial strategy established by the Plan;

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<sup>8</sup> [2016] EWHC 2512 (Admin). CO/2515/2016. Stonegate Properties Ltd and Littleworth Properties Ltd vs Horsham District Council and Henfield Parish Council.

2. the NDP had failed to consider any alternatives to the Built-Up Area Boundary (BUAB) as established in the NHP; and
3. the NDP Inspector failed to give any adequate reasons as to why the NDP met EU obligations.

13.23 In the background to the challenge, J Patterson notes that Henfield is recognised as a village appropriate to accommodate further housing development, as a category 1 village in the higher tier Henfield Core Strategy (paragraph 31 of **Appendix 11**). From reviewing this judgement, it is clear that Henfield is considered on a similar settlement hierarchy as Bodenham Moor, as the largest village in the Bromyard HMA.

13.24 As part of the Henfield NDP, the Plan sought to exclude development to the west of the village on the grounds that locals felt it would place unsustainable pressure on the local road system and infrastructure. In her assessment of the site, J Patterson found that the assertions made to justify the exclusion of development to the west of the village was not supported by evidence and cannot be considered anything other than guesswork (paragraphs 73 and 74 refer). Paragraph 74 reasons that as no evidence has been presented to qualify the points made, the reason for rejecting the option were flawed. As a consequence, under the SEA Directive the need to assess alternatives in a comparable and accurate way was not undertaken.

13.25 RPS finds that this description of how the Henfield NDP was undertaken mirrors closely the loose approach towards evidence included in the Draft BNDP. RPS notes the assessment of housing sites made as part of the supplementary note supporting the Draft BNDP which is founded on a number of anecdotal assumptions and sweeping statements. This evidence note rules out the site for potential residential use from the outset (paragraph 4.3.1) noting that the preference for a Local Green Space would be incompatible with housing. In addition to making this foregone conclusion, the note includes an assessment of the site against a mixture of uses (paragraphs 4.3.2 to 4.3.9 though no evidence is presented to justify these comments. Evidence has been presented on these issues as part of the former planning application for the site (15/0437) though this has not informed the BNDP options assessment process. As part of the planning application, the Planning Officer was satisfied that sufficient evidence was prepared which met the local requirements and importantly, represented sustainable development. No references have been made to this point, or the evidence underpinning the assessment.

13.26 The second ground of the challenge to the Henfield NDP followed similar grounds, indicating that the imposition of the settlement boundary (BUAB) had not been tested through a process which considered reasonable alternatives. This, again, corresponds to the treatment of settlement boundaries undertaken as part of the Draft BNDP, which has included only one fixed boundary which establishes the extent of development. Indeed, the ER does include an assessment of alternative options which includes extending the proposed boundary to include housing allocations (paragraph 5.2 or the ER refers), though the exact boundary is not specified (or taken into account as part of the NDP). In the case of the Henfield NDP, J Patterson reasoned that the settlement boundary is intrinsically linked to the delivery of the spatial strategy, which should have been qualified by an assessment of alternatives (paragraph 100 refers). As a consequence, J Patterson also found that this area of policy was in breach of EU obligations.

- 13.27 RPS considers that the imposition of the settlement boundary is linked to the delivery of spatial Policy BNDP1: Delivering New Homes and as such should have tested alternative options for delivery. Much like the Henfield NDP, the Draft BNDP has failed to do this.
- 13.28 RPS therefore considers that the Draft BNDP has fallen foul of the same mistakes made in the Henfield NDP and has not considered reasonable alternatives to the plan, consistent with the SEA Directive and therefore the Draft BNDP is incompatible with EU obligations.

## 14 SUITABILITY OF LAND SOUTH OF CHAPEL LANE

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- 14.1 As indicated in Section 11 of this response, the Draft BNDP is supported by an information sheet<sup>9</sup> relating to the consideration of potential housing land in the BNDP area.
- 14.2 This includes an assessment of three sites in Bodenham Moor and two sites in Bodenham. These are listed below:
- Site 1: Land South of Chapel Lane (Bodenham Moor)
  - Site 2: Land Opposite England's Gate (Bodenham Moor)
  - Site 3: Land to the Rear of Jalna, Chapel Lane (Bodenham Moor)
  - Site 4: Land to the North of Bunhill (Bodenham)
  - Site 5: Land to the North of Bank House (Bodenham)
- 14.3 This report does not propose to assess each of these sites in detail, this should have been the responsibility of the BNDP. RPS does however wish to raise concern with the assessment of Site 1: Land South of Chapel Lane, which corresponds with land promoted by Bovis Homes.
- 14.4 Before comments are provided in relation to this site, it should be noted from the outset that RPS questions the validity of the inclusion of this evidence, which does not disguise the lack of objectivity present in the assessment process and as indicated in Section 13, has not been subject to the Environmental Report. Additionally, the evidence base document has been very selective in the information presented in the note, ignoring a number of key factors in the assessment of suitability, availability and achievability.
- 14.5 This is apparent from paragraph 2.1 of the note, which includes the list of studies considered in the site selection process. Notably absent from this list is the latest 2015 Housing Land Assessments which includes a culmination of the housing land availability assessments in Herefordshire to date.
- 14.6 These documents provide the most up to date information published by Herefordshire Council on the deliverability of sites in Bodenham Moor and Bodenham, however they have been omitted from this study. The document for Bodenham Moor in particular indicates 15 sites which have been submitted to Herefordshire Council, all of which have been appraised against local constraints to determine the potential suitability. Despite this, the Draft BNDP appears to have only considered three sites in the assessment, one of which (Site 2: Land Opposite England's Gate) has already been approved through development management process and is considered as a commitment rather than a potential future allocation. If the study was to approach land around the villages in an objective manner, all the sites would have been considered, allowing for more realistic opportunities for comparison, which would also have gone some way to demonstrate that alternatives had been considered as part of the process, the requirement for

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<sup>9</sup> Potential Housing Land in Bodenham Neighbourhood Area: Consideration of Options and Reasoned Assessment



which has been established through the Henfield Decision<sup>10</sup> (as noted in Section 13 of this report).

### Site History

- 14.7 RPS has been involved in the promotion of this site for Bovis Homes through preparation of the Herefordshire Core Strategy and supporting SHLAA documents. A planning application was submitted to the Council (reference 15/0437) in February 2015, which was determined by Herefordshire's Planning Committee in October of the same year.
- 14.8 The application proposed 49 dwellings on the site (illustrative plan enclosed as part of **Appendix 1**), which included affordable housing, open space and a children's play area. The Planning Officer's Report was presented before members recommending that permission be granted for the proposed development. The Planning Officer demonstrated that the proposed development contributed towards the fulfilment of the economic and social roles of sustainable development, responded well to the landscape setting of the village and preserved the setting of the adjacent listed buildings (paragraph 7.2 of **Appendix 2** refers). Subsequently, the Planning Officer considered that this scheme represented sustainable development which accorded with the policies in the HLP.
- 14.9 Though the site was recommended for approval, elected members did not reach the same conclusion. Further to discussion the scheme was refused on two grounds:
1. Members felt that the erection of 49 dwellings would not reflect the size of Bodenham Moor and would be prejudicial to its landscape setting and settlement pattern. The proposal would not result in the delivery of a scheme that generate the size, type and range of housing required in Bodenham Moor or the wider Bromyard HMA; and
  2. Members reviewed the context of a further 49 dwellings on the proposed scheme in the context of the recent granting 40 dwellings [*Land Opposite England's Gate*] in the northern end of the village. Members felt that further large-scale unplanned growth on greenfield land without proportionate increases in local services or employment would be unnecessary. Reference was also made to the emerging Neighbourhood Plan which was considered to render irrelevant the housing delivery in the village, contrary to local views.

### BNDP Evidence Base

- 14.10 As noted above the evidence underpinning the assessment of potential housing land is the information sheet for the consideration of potential housing land in the BNDP area. The assessment of Land at Chapel Lane follows around two pages of text, most of which appears to have been transposed from previous submissions to the Core Strategy, as it includes references to policies in the former UDP (such as Policy E16 on paragraph 4.3.5) which have since been superseded. Reference is also made to the *emerging* Core Strategy (paragraph 3.1).
- 14.11 Paragraph 3.1 of the note refers to a range of criteria which were considered in the assessment of sites, including compliance with the Core Strategy, constraints to development, visual impact, environmental health concerns and connectivity to services.

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<sup>10</sup> [2016] EWHC 2512. Stonegate Homes and Littleworth Properties vs Horsham District Council and Hensfield Paish Council. Published 13 October 2016

14.12 Though the note sets out this criteria, it is unclear whether these issues have been considered at all, for the assessment of Land at Chapel Lane follows a fragmented approach of mainly anecdotal information, rather than an assessment informed by evidence. Each of the issues raised in the BNDP evidence are turned to as they are raised in the note, with headings to indicate the topic area.

#### *Flooding & Drainage*

14.13 Paragraph 4.21 of the note indicates refers to the 2009 SHLAA assessment, which presented the site as one with low/minor constraints. The supporting text, replicated in paragraph 4.21 of the BNDP evidence notes that the site appears viable and could take access from the C1125 or C1114 on Chapel Lane. It is noted that the southern edge of the site is flood zone 3 and is in an area of minerals constraint. Paragraph 4.3.2 of the BNDP evidence also draws on the impact of potential flooding

14.14 As part of the 2015 planning application for the site, plans were submitted which would not only mitigate this impact but seek to improve the existing situation in Bodenham Moor, where there are known flooding issues. In the Planning Officers Report of the site, he comments that the Flood Risk Assessment (FRA) submitted alongside the proposal included plans for sustainable urban drainage to attenuate surface water flows from the site and additionally demonstrated that there was no risk from fluvial flooding (paragraph 6.27 refers).

14.15 Comments are also made within the BNDP evidence relating to the capacity of the existing sewerage infrastructure to meet demand generated by the site (paragraph 4.3.9 refers).

14.16 This provides an update to the evidence base of the Council's 2009 SHLAA and demonstrates that this is not an issue which would affect delivery and the BNDP evidence is incorrect to include this in their assessment.

#### *Heritage*

14.17 The opening paragraph to the assessment of Land South of Chapel Lane includes reference to the proximity of the site to a number of Grade II listed buildings, notably Broom Cottage, The Haven (near the C1125 junction) and the Moor Farm House, all of which are Grade II listed. Additionally, this paragraph also makes reference to a large crop circle in the centre of the site, which the BNDP evidence considers may have possible archaeological interest.

14.18 In this regard, RPS would draw the Inspector's attention to the comments received in response to the Archaeological and Heritage Assessment submitted by Bovis Homes as part of the 2015 planning application. In the Planning Officers Report, he includes responses from the Council's Conservation Manager, who comments on both the historic assets and archaeology separately. The comments from the Conservation Manager indicate that the previous layout presented to the Council demonstrated that, through layout and existing vegetative screening, there was not a strong visual link between the development and the surrounding Grade II Listed Buildings. In terms of archaeology, the Conservation Manager took the view that the buried ring ditch (referred to in the BNDP evidence) was likely a Bronze Age feature representing the largely ploughed out remains of a former barrow or burial mound (paragraph 4.12 of the Planning Officer's Report refers). The Conservation Manager then goes onto suggest that given the condition of this feature and the isolation of the findings, it is of moderate archaeological significance which can

be mitigated through development. The Officer stated that there was no objection in regard to either heritage or archaeology.

- 14.19 Further to this, an additional statement has been prepared by EDP to reconsider the heritage assets in Bodenham Moor and the contribution of Land South of Chapel Lane to the heritage aspect of the LGS designation. This evidence (presented under **Appendix 12**) indicates that development is not precluded on this site for heritage reasons and the evidence provided as part of the BDNP in this regard is flawed.

#### *Landscape*

- 14.20 As an opening to the assessment of Land South of Chapel Lane, paragraph 4.3.1 of the BNDP evidence includes the foregone conclusions that this site is considered to be an important open space, making a distinctive contribution to the settlement.
- 14.21 This statement is not informed by any evidence of local landscape character which was comprehensively addressed as part of the 2015 planning application, to the satisfaction of Herefordshire Council. In addition to this, a further supplemental landscape report is proposed by RPS, which will be submitted further to this statement before the end of the consultation.

#### *Transport*

- 14.22 Paragraph 4.3.3 of the BNDP evidence base refers to anecdotal evidence of highways concerns in Bodenham Moor village relating both to the access and the capacity of the local road network. As part of the 2015 application, this issue was explored by the Traffic Manager at Herefordshire Council who raised no objection to the proposal. In the Planning Officer's report to committee (**Appendix 2**), it is noted that there is no quantifiable evidence to suggest that the highways network is not capable of safely accommodating traffic generated from 49 dwellings) and there are no objections to the point of access and visibility splays (paragraph 6.34 refers).

#### *Odour/Amenity*

- 14.23 Paragraphs 4.3.5 to 4.3.7 of the BNDP evidence refer to the proximity of the site to neighbouring farm properties, including Eastfield Farm. The evidence suggests that the uses relating to the farm result in issues of noise and odour, which affect existing residents and whilst it is not explicit, it is inferred that residential development on this site would also be affected. The evidence draws on former UPD Policy E16 in support of this point, however this has since been superseded by the HLP.
- 14.24 The issue of noise, odour and amenity relating to the site's proximity to Eastfield Farm was the subject of scrutiny as within the 2015 planning application on the site and an odour assessment was undertaken in response to consultation with the Council's Environmental Health Manager.
- 14.25 Having considered the Odour Assessment submitted to the Council, the Environmental Health Manager had no objection to development at this location, citing that the lack of recorded complaints to odour provides a good indication that there are no ongoing problems in this area. The Odour Report submitted alongside the application and the addendum report prepared therefore satisfied the requirements of the Environmental Health Manager.

## Other Issues

- 14.26 The issues listed above respond to the particular concerns raised by through the BNDP in response to the suitability of Land South of Chapel Lane. They do not, however, reflect a full and comprehensive list of planning issues that are usually considered as part of a robust site selection process. The additional areas were covered as part of the application submission and dealt with in the Planning Officers Report:
- Landscape – scheme submitted in 2015 considered to comply with landscape Policy LD1 (of the HLP) in every respect (paragraph 6.16 of **Appendix 2** refers).
  - Biodiversity and Geodiversity – the Planning Officers report noted that the scheme complied with Policy LD2 of the HLP, offering opportunities for biodiversity enhancement and meeting the requirements of Policy LD3 of the HLP in terms of Green Infrastructure provision (paragraph 6.17 of **Appendix 2** refers).
  - Design – the Planning Officer noted that the 2015 application responded to the existing local character in terms of design and layout. The scheme responded positively to Policy RA2 of the HLP in terms of a high quality and sustainable design that is appropriate to the local context (paragraph 6.10 of **Appendix 2** refers).
  - Affordable Housing – in the summary of the Planning Officers report it is noted (paragraph 7.1 of **Appendix 2**) that the delivery of 49 dwellings, including 35% affordable would, along with the input of community open space, contribute towards the fulfilment of the economic and social roles of sustainable development.
- 14.27 These issues have been considered as part of the SHLAA submissions made to Herefordshire Council as part of the evidence generation process for the HLP. The HLP does not however allocate sites at a local level and expressed a preference for Neighbourhood Plans to be the proactive vehicles to deliver additional new development. As indicated in this response, this has not been done, leaving the BNDP in a vulnerable position in terms of meeting its housing need.

## Summary

- 14.28 As demonstrated above, the evidence proposed as part of the BNDP submission is not fit for purpose and does not approach the assessment of sites in a consistent or objective way. Comments offered above relate to the BNDP views associated with Land at Chapel Lane, however this assessment is by no means comprehensive and does not even conform to the list of criteria in the BNDPs own evidence document (para 3.1). The 2015 planning application offers a more comprehensive approach towards the evidence for the site, addressing each of these planning areas in detail, amongst other topics not raised in the BNDP evidence. This information is available to the Inspector on request, though a summary of the position is succinctly included within the Planning Officer's Report (**Appendix 2**).
- 14.29 The issues addressed above demonstrates that the draft BNDP has had little regard to evidence in the site selection process and has ignored the positive benefits that could be derived from the development of land south of Chapel Lane. RPS considers that this site is entirely suitable for development and would constitute sustainable development in the context of the village. In order to give the plan sufficient certainty of delivery, RPS proposes that this site is included within the

BNDP as an allocation for housing development, which can incorporate the benefits and mitigation measures explored in detail as part of the 2015 planning application.

## 15 CONCLUSIONS AND RECOMMENDATIONS TO INSPECTOR

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15.1 As indicated within this response, RPS considers that there are serious concerns with the Draft BNDP, which is not compliant with the Herefordshire Local Plan and fails to meet the basic conditions required by the paragraph 41-065-20140306 of the NPPG. The principal issues identified by RPS in this report are summarised below:

- The Draft BNDP is not underpinned by credible or robust evidence and RPS is concerned that this Plan will frustrate future housing delivery including the provision of affordable housing to meet local need;
- The Draft BNDP has not aligned itself with the housing requirement set in the Herefordshire Local Plan and has not used the Herefordshire housing data in presenting evidence of permissions and completions in the Parish;
- The Draft BNDP Settlement Boundaries are not sufficiently flexible to respond to emerging evidence of housing need and do not allow for new growth to come forward in Bodenham Moor;
- The evidence supporting the Draft BNDP has not adequately considered the need for new housing sites and the benefits that these could make in terms of supporting local housing need. The assessment of potential housing sites is flawed;
- The Draft BNDP has not been objective or honest in its assessment of sites proposed as Local Green Spaces. Particular reference is made to the proposed Local Green Space on Land South of Chapel Lane and clear evidence has been presented by RPS to demonstrate that this site does not conform to the strict remit of the qualifying features these sites should include. Equally, RPS does also not agree with other sites promoted by the Draft BNDP which are considered to either be ineligible, or are covered by separate designations; and
- The Environmental Report supporting the Draft BNDP has not correctly articulated the need to consider alternative sites for housing and has not been clear in its recommendations over the most sustainable alternative options. Additionally, the Environmental Report has been skewed from the outset and has not considered objectives that would contribute towards the broader consideration of sustainable development.

15.2 Taking these issues into consideration, RPS considers that there is significant cause for concern related to how the Draft BNDP has been approached, which has not taken into account the need to plan flexibly for new growth in Bodenham Moor and has not undertaken an honest appraisal of the suitability of potential new growth sites for housing in the village. For this reason, RPS encourages the Inspector to withhold the Draft BNDP from Referendum until key concerns are addressed.

15.3 RPS proposes a number of recommendations to the Draft BNDP, which would bring the document in line with the Herefordshire Local Plan and ensure that the BNDP is capable of enduring the plan period over the next 15 years. These recommendations are set out below:

- The housing requirement in the BNDP should be framed against the housing data from Herefordshire Council (as replicated in **Appendix 3**);

- The Settlement Boundaries should be amended to be more flexible, in line with the Yapton Decision. RPS considers that this should include Land South of Chapel Lane;
- The evidence underpinning the identification of housing sites should be revised in line with the comments prepared in this report;
- The Local Green Spaces policy should be removed from the plan;
- The BNDP needs to qualify why it has not progressed options for growth which include housing allocations, which scored well in the supporting Environmental Report;
- The Environmental Report needs to be amended to include a thorough assessment of potential housing sites and criterion which align with socio-economic indicators; and
- RPS considers that Land South of Chapel Lane represents the most suitable location for growth in the BNDP area, capable of supporting affordable housing delivery and public open space. This site has not been fairly considered by the Parish Council and RPS is of the view that this site should be allocated in the Plan to ensure that it remains sufficiently flexible and resilient to deal with future uncertainty in the plan period.

15.4 It is understood from the NPPG that most Examinations of BNDPs are undertaken as part of written representations, however in order to give certain issues a fair Examination, it may be necessary to hold a hearing to allow further views on particular issues (paragraph 41-056-20140306 refers). Ultimately, this decision rests with the Inspector, though RPS has outlined what it considers to be significant issues associated with the plan and remains available to be called upon for an Examination hearing, should the Inspector wish it.

# Appendix 7



Objectives verses SEA Objectives (SMART and Compatibility Test)				
SEA Stage B1	<b>Key:</b>	<b>SMART criteria:</b>		
+ =/++	Compatible/very comp	<b>S – Specific:</b>	NDP objectives should specify what is intended to be done in detail and should not be open to a wide range of misinterpretations	
- =	Possible conflict	<b>M – Measurable:</b>	It should be possible to monitor NDP objectives in a quantifiable way, by the use of indicators. Indicators should be measurable with limited resource implications.	
0 =	Neutral	<b>A – Attainable/achievable:</b>	NDP objectives should be achievable and deliverable, related to the scale of growth proposed	
X =	No relationship between objectives	<b>R – Realistic:</b>	NDP objectives should relate to the overall vision of the plan. Likewise, chosen indicators should relate to objectives and their outcomes.	
? =	Unclear, more information needed	<b>T – Time-Bound:</b>	Objectives should be specific to the NDP period or another specified time-frame. Objectives should be associated with a target and indicators should specify when the target should be achieved.	

The following matrix appraises the emerging Bodenham NDP Objectives in terms of their SMART criteria and their compatibility with the SEA Objectives. These have been developed from Government guidance on SEA and from the local evidence base gathered for identifying the NDP issues.

NDP Policies	SEA objectives																Summary in relation to baseline	Overall commentary and any initial cumulative effects/ Recommendations	Conformity with Core Strategy
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16			
<b>Baseline</b>	1	2	3	4	5	6	7	8	9	10	11	12	NA	NA	NA	13			
<b>BNDP2: Settlement boundaries</b>	+	+	+	+	+	+	+	+	+	+	+	+				+	Overall the policy is compatible and has a positive impact on the baseline data	The policy is seeking to encourage future development to take place in sustainable locations by the introduction of two settlement boundaries. Criteria exists to safeguard the character of the area, important assets, and open spaces, areas of flooding and highway safety.  Additional reference has been made to biodiversity assets and has strengthen the policy further with particularly reference to the River Wye SAC and its catchment.	This policy would meet the Core Strategy requirements in terms of the SEA
<b>BNDP3: Mix, type and tenure of new housing development</b>	+	+	+	+	+	+	+	?	?	+	+	+				+	Overall the policy is compatible and has a positive impact on the baseline data	This policy reflects the provision of the Core Strategy and will only lead to very small scale development outside the settlement boundary where the criteria of H2 are met.	This policy would meet the Core Strategy requirements in terms of the SEA
<b>BNDP 4: Flooding risk and drainage</b>	++	+	+	x	x	x	++	++	+	+	++	+				+	Where relevant this policy is compatible and has a positive impact on the baseline data	This policy would not lead to development but it a criteria which is seeking to provide sufficient safeguards against flooding in an area known for existing flooding issues. The policy also will have a positive effect on the natural environment and the quality of the surroundings.	This policy would meet the Core Strategy requirements in terms of the SEA
<b>BNDP5: Employment</b>	+	+	+	+	+	+	?	?	?	+	+	+				+	Overall the policy is compatible and has a positive impact on the baseline data	This policy is seeking to provide small scale business opportunities for the parish. This will allow people to work from home and reduce the need to travel. Policy criteria exists both within the Core Strategy and other NDP policies to ensure a positive effect on the baseline.	this policy would meet the Core Strategy requirements in terms of SEA

<p><b>BNDP6:</b> Large scale economic activity New policy</p>	+	+	+	+	+	+	x	x	+	x	x	+				+	Overall this policy is compatible and has a positive impact on the baseline data.	This policy is aiming to reduce the impact of any large scale employment activities within the environment. The policy indicates a 400m buffer distance between non farming receptors	This policy would meet the Core Strategy requirements in terms of the SEA
<p><b>BNDP9:</b> Landscape design principles</p>	++	++	++	++	+	x	+	+	++	x	+	++				++	Overall this policy is compatible and has a positive impact on the baseline data.	The policy will not lead to development but seeks to ensure that any future development protects the specific landscape feature, setting and characteristics. Particular reference is made to the River Wye SAC and it's catchment	This policy would meet the Core strategy requirements in terms of the SEA
<p><b>BNDP10:</b> Protection of local character</p>	++	++	++	++	+	?	?	x	x	x	x	+				+	Overall this policy is compatible and has a positive impact on the baseline data.	This policy will not lead to development but is seeking to protect and enhance the local character by providing design criteria. This will have a positive effect on the SEA objective baseline. Reduction in lighting will also have the additional benefit to nocturnal species.	This policy would meet the Core strategy requirements in terms of the SEA
<p><b>BNDP11:</b> Dark Skies New policy</p>	++	+	++	+	x	x	+	+	x	x	x	x				+	Overall this policy is compatible and has a positive impact on the baseline data.	This will have a positive effect on the SEA objective baseline. Reduction in lighting will also have the additional benefit to nocturnal species	This policy would meet the Core strategy requirements in terms of the SEA
<p><b>BNDP13:</b> Renewable energy</p>	+	+	+	+	x	x	+	x	x	x	?	?				+	Overall this policy is unknown as is it locational dependent. However, additional policy safeguards in other policy will assist ensuring a positive effect on the baseline	This policy is seeking to support appropriate small scale renewable energy schemes but discourage larger commercial ones. The fully effects on the baseline are unknown as this stage as they are locational dependent. Other policies of the Core Strategy and the NDP exist to safeguard the baseline and this can be fully explored at any application stage.	This policy would meet the Core Strategy requirements in terms of the SEA

D3: Predict and evaluate the effects of the policies and sites within the Neighbourhood Development Plan

**Key:**

++ Move towards significantly	+ Move towards Marginally	- - Move away significantly	- Move away marginally	0 Neutral	? Uncertain	N/A No relationship
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*Policy BNDP2: Settlement boundaries*

SEA Objective	Assessment of effect (consider cumulative effects, significance of the effect and magnitude of the effect in terms of the three time periods)			Summary Explanation	Enhancement and mitigation opportunities
	Short term (1 – 5 years)	Medium term (6 – 10 years)	Long term (11 years +)		
To maintain and enhance nature conservation (biodiversity, flora and fauna)	+	+	+	This Policy is not over and above the Core Strategy in terms of SEA objectives and would lead to development in line with the proportional growth within the Core Strategy. Policy safeguards are included within the plan to ensure nature conservation is taken into consideration.	

## D3: Predict and evaluate the effects of the policies and sites within the Neighbourhood Development Plan

To maintain and enhance the quality of landscapes and townscapes	+	+	+	This Policy is not over and above the Core Strategy in terms of SEA objectives and would lead to development in line with the proportional growth within the Core Strategy. Policy safeguards are included within the plan to ensure landscape and townscape character is taken into consideration.	
To improve quality of surroundings	+	+	+	This Policy is not over and above the Core Strategy in terms of SEA objectives and would lead to development in line with the proportional growth within the Core Strategy. Policy safeguards are included within the plan to ensure character, setting and landscape is taken into consideration.	
To conserve and where appropriate enhance the historic environment and cultural heritage	+	+	+	This Policy is not over and above the Core Strategy in terms of SEA objectives and would lead to development in line with the proportional growth within the Core Strategy. Policy safeguards are included within the plan to ensure that the	

## D3: Predict and evaluate the effects of the policies and sites within the Neighbourhood Development Plan

				historic environment is taken into consideration.	
To improve air quality	+	+	+	This policy is in line with the growth requirements set out within the Core Strategy. Focusing development on sustainable locations will help reduce the need to travel to services and improve air quality	
To reduce the effect of traffic on the environment	+	+	+	This policy is in line with the growth requirements set out within the Core Strategy. Focusing development on sustainable locations will help reduce the need to travel to services	
To reduce contributions to climate change	+	+	+	This Policy is not over and above the Core Strategy in terms of SEA objectives and would lead to development in line with the proportional growth within the Core Strategy. Policy safeguards are included within the plan, particularly regarding flooding to ensure that contributions to climate changes are achieved.	

## D3: Predict and evaluate the effects of the policies and sites within the Neighbourhood Development Plan

To reduce vulnerability to climate change	+	+	+	This Policy is not over and above the Core Strategy in terms of SEA objectives and would lead to development in line with the proportional growth within the Core Strategy. Policy safeguards are included within the plan, particularly flooding to ensure that vulnerability is taken into account	
To improve water quality	+	+	+	The Nutrient Management Plan is in place to ensure that areas within the River Wye catchment area are contributing to meeting the conservation objectives of the SAC and improving water quality within the River Lugg.	
To provide for sustainable sources of water supply	+	+	+	Welsh water have confirmed that there is sufficient headroom within the works and sufficient supply	
To avoid, reduce and manage flood risk	+	+	+	Bodenham are very aware of the flooding issues within the parish and this has been address with additional policies within the plan. This will enable proportional growth to occur	

## D3: Predict and evaluate the effects of the policies and sites within the Neighbourhood Development Plan

				whilst being minded of the existing issues.	
To conserve soil resources and quality	+	+	+	This policy is in line with the Core Strategy. The definition of a settlement boundary will direct the majority of development to sustainable locations and thus safeguard the wide soil resource within the parish	
To minimise the production of waste					
To improve health of the population					
To reduce crime and nuisance					
To conserve natural and manmade resources	+	+	+	This Policy is not over and above the Core Strategy in terms of SEA objectives and would lead to development in line with the proportional growth within the Core Strategy. Policy safeguards are included within the plan to ensure aspects of the natural and manmade environment are taken into consideration.	

## D3: Predict and evaluate the effects of the policies and sites within the Neighbourhood Development Plan

<b>Overall commentary and any cumulative effects</b>	The designation of two settlement boundaries given more certainty to growth and its locations. Sufficient policy safeguards exist particularly around flooding and the protection of the character and setting of the two villages. The policy is in conformity with the Core Strategy rural policies.
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*Policy BNDP3: Mix, type and tenure of new housing development*

SEA Objective	Assessment of effect (consider cumulative effects, significance of the effect and magnitude of the effect in terms of the three time periods)			Summary Explanation	Enhancement and mitigation opportunities
	Short term (1 – 5 years)	Medium term (6 – 10 years)	Long term (11 years +)		
To maintain and enhance nature conservation (biodiversity, flora and fauna)	?	+	+	The policy is in conformity with policy H2 and sufficient safeguards exist within other policies of the plan.	
To maintain and enhance the quality of landscapes and townscapes	+	+	+	The policy is in conformity with policy H2 and sufficient safeguards exist within other policies of the plan.	



## D3: Predict and evaluate the effects of the policies and sites within the Neighbourhood Development Plan

To improve quality of surroundings	+	+	+	The policy is in conformity with policy H2 and sufficient safeguards exist within other policies of the plan.	
To conserve and where appropriate enhance the historic environment and cultural heritage	+	+	+	The policy is in conformity with policy H2 and sufficient safeguards exist within other policies of the plan.	
To improve air quality	+	+	+	The policy is in conformity with policy H2 and sufficient safeguards exist within other policies of the plan. The provision of affordable homes near to existing facilities will help to reduce the need to travel and improve air quality	
To reduce the effect of traffic on the environment	+	+	+	The policy is in conformity with policy H2 and sufficient safeguards exist within other policies of the plan. The provision of affordable homes near to facilities will help to reduce the need to travel.	
To reduce contributions to climate change	+	+	+	The policy is in conformity with policy H2 and sufficient safeguards exist within other policies of the plan.	
To reduce vulnerability	?	+	+	The policy is in conformity with policy H2 and sufficient safeguards	

## D3: Predict and evaluate the effects of the policies and sites within the Neighbourhood Development Plan

to climate change				exist within other policies of the plan.	
To improve water quality	?	+	+	The policy is in conformity with policy H2 and sufficient safeguards exist within other policies of the plan. The Nutrient Management Plan is in place to help safeguard water quality within the River Wye and River Lugg.	
To provide for sustainable sources of water supply	+	+	+	Welsh water have confirmed that there is sufficient headroom within the works and sufficient supply	
To avoid, reduce and manage flood risk	+	+	+	The policy is in conformity with policy H2 and sufficient safeguards exist within other policies of the plan. Additional policy safeguards exist within BNDP4 to ensure that this locally important issues is addressed	
To conserve soil resources and quality	+	+	+	The policy is in conformity with policy H2 and sufficient safeguards exist within other policies of the plan.	
To minimise the production of waste					
To improve health of the population					

D3: Predict and evaluate the effects of the policies and sites within the Neighbourhood Development Plan

To reduce crime and nuisance					
To conserve natural and manmade resources	+	+	+	The policy is in conformity with policy H2 and sufficient safeguards exist within other policies of the plan.	
<b>Overall commentary and any cumulative effects</b>	This policy is in line with Core Strategy policy H2 and a number of other policies are contained within the plan to ensure that any effects are reduced or mitigated.				

*Policy BNDP4: Flood risk and drainage*

SEA Objective	Assessment of effect (consider cumulative effects, significance of the effect and magnitude of the effect in terms of the three time periods)			Summary Explanation	Enhancement and mitigation opportunities
	Short term (1 – 5 years)	Medium term (6 – 10 years)	Long term (11 years +)		

## D3: Predict and evaluate the effects of the policies and sites within the Neighbourhood Development Plan

To maintain and enhance nature conservation (biodiversity, flora and fauna)	++	++	++	This policy is seeking to address some of the known flooding issues within Bodenham. This could have a positive consequence on area of nature conservation and species habitats.	
To maintain and enhance the quality of landscapes and townscapes	+	+	++	The reduction and management of flooding occurrences could have a positive effect on the quality of the townscape and sense of place.	
To improve quality of surroundings	+	+	++	The reduction and management of flooding occurrences could have a positive effect on the quality of the townscape and sense of place.	
To conserve and where appropriate enhance the historic environment and cultural heritage	x	x	x	No relationship	
To improve air quality	x	x	x	No relationship	
To reduce the effect of traffic on the environment	x	x	x	No relationship	
To reduce contributions to climate change	++	++	++	The management of the flooding and drainage issues within the parish will have a positive effect in the management of climate change	

## D3: Predict and evaluate the effects of the policies and sites within the Neighbourhood Development Plan

				and the impact on existing and future residents and businesses.	
To reduce vulnerability to climate change	++	++	++	The management of the flooding and drainage issues within the parish will have a positive effect in the management of climate change and the impact on existing and future residents and businesses.	
To improve water quality	+	+	+	The Nutrient Management plan is in place to assist improve the water quality along this stretch of the River Lugg. The policy have reference to this in the management of foul water and run off	
To provide for sustainable sources of water supply	+	+	+		
To avoid, reduce and manage flood risk	++	++	++	The principle of this policy is to management and improve the known flood issues within the parish.	
To conserve soil resources and quality	+	+	+	The principle of this policy is to reduce and management surface water flooding within the area	

D3: Predict and evaluate the effects of the policies and sites within the Neighbourhood Development Plan

To minimise the production of waste					
To improve health of the population					
To reduce crime and nuisance					
To conserve natural and manmade resources	+	+	+	The policy is seeking to management flooding and drainage issues within the parish.	
<b>Overall commentary and any cumulative effects</b>	There are well known flooding and drainage issues within the parish. This policy aims to address this when considering future development within the parish. This policy will have a positive effect on the baseline.				

*Policy BNDP5: Employment*

SEA Objective	Assessment of effect (consider cumulative effects, significance of the effect and magnitude of the effect in terms of the three time periods)			Summary Explanation	Enhancement and mitigation opportunities
	Short term (1 – 5 years)	Medium term (6 – 10 years)	Long term (11 years +)		

## D3: Predict and evaluate the effects of the policies and sites within the Neighbourhood Development Plan

To maintain and enhance nature conservation (biodiversity, flora and fauna)	+	+	+	This Policy is not over and above the Core Strategy in terms of SEA objectives and would lead to small scale employment development in line with the Core Strategy. Policy safeguards are included within the plan to ensure nature conservation is taken into consideration.	
To maintain and enhance the quality of landscapes and townscapes	+	+	+	This Policy is not over and above the Core Strategy in terms of SEA objectives and would lead to small scale employment development in line with the Core Strategy. Policy safeguards are included within the plan to ensure landscape and townscape character is taken into consideration.	
To improve quality of surroundings	+	+	+	This Policy is not over and above the Core Strategy in terms of SEA objectives and would lead to small scale employment development in line with the Core Strategy. Policy safeguards are included within the plan to ensure the character of the surroundings is taken into consideration.	
To conserve and where appropriate enhance the historic environment and	+	+	+	This policy is not over and above the Core Strategy and would lead to small scale employment development. Policy safeguards exist to ensure that the historic environment is taken into	

## D3: Predict and evaluate the effects of the policies and sites within the Neighbourhood Development Plan

cultural heritage				consideration.	
To improve air quality	+	+	+	The policy encourages the provision of small business space, live work and home working. This will help to reduce the need to travel but may also encourage additional travel for some employees. This would have a consequential effect on air quality.	
To reduce the effect of traffic on the environment	o	o	+	The policy encourages the provision of small business space, live work and home working. This will help to reduce the need to travel but may also encourage additional travel for some employees.	
To reduce contributions to climate change	?	+	+	Additional policies within the plan will safeguard this element	
To reduce vulnerability to climate change	?	+	+	Additional policies within the plan will safeguard this element, particularly policy BNDP4.	
To improve water quality	?	+	+	The Nutrient Management Plan will provide additional safeguards to ensure that water quality within the River Lugg catchment is meeting the directive standards	
To provide for sustainable sources of water supply	?	+	+	The policy is seeking to encourage small scale businesses and opportunities to work from home rather than larger scale which may consume higher volumes of water	



## D3: Predict and evaluate the effects of the policies and sites within the Neighbourhood Development Plan

				supply.	
To avoid, reduce and manage flood risk	+	+	+	The policy is seeking to provide small scale employment and sufficient safeguards exist within other policies of the plan. Additional policy safeguards exist within BNDP4 to ensure that this locally important issues is addressed	
To conserve soil resources and quality	+	+	+	This policy is seeking to reuse existing building, working for home and small scale new development. This will safeguard soil resource whilst providing employment opportunities	
To minimise the production of waste					
To improve health of the population					
To reduce crime and nuisance					
To conserve natural and manmade resources	+	+	+	Policy criteria and safeguards are seeking to maintain a number of natural and manmade resources.	
<b>Overall commentary and any cumulative effects</b>	This policy is seeking to provide local employment opportunities and reduce the need to travel.				

## D3: Predict and evaluate the effects of the policies and sites within the Neighbourhood Development Plan

*Policy BNDP 6: Large scale economic activity*

SEA Objective	Assessment of effect (consider cumulative effects, significance of the effect and magnitude of the effect in terms of the three time periods)			Summary Explanation	Enhancement and mitigation opportunities
	Short term (1 – 5 years)	Medium term (6 – 10 years)	Long term (11 years +)		
To maintain and enhance nature conservation (biodiversity, flora and fauna)	+	+	+	This policy is seeking to reduce the impact of large economic activity on the natural environment particularly the biodiversity of the area	
To maintain and enhance the quality of landscapes and townscapes	+	+	+	This policy is seeking to reduce the impact of large economic activity on the natural and historic environment particularly the visual impact on the area	
To improve quality of surroundings	+	+	+	This policy is seeking to reduce the impact of large economic activity on residential amenity	
To conserve and where appropriate enhance the historic	+	+	+	This policy is seeking to reduce the impact of large economic activity on the historic	

## D3: Predict and evaluate the effects of the policies and sites within the Neighbourhood Development Plan

environment and cultural heritage				environment	
To improve air quality	+	+	+	This policy contains restrictions on the location of non-farming receptors to assist air quality.	
To reduce the effect of traffic on the environment	x	x	x	No relationship	
To reduce contributions to climate change	+	+	+	This policy is seeking to reduce any potential risks associated with flooding and drainage	
To reduce vulnerability to climate change	+	+	+	This policy is seeking to reduce any potential risks associated with flooding and drainage	
To improve water quality	+	+	+	The Nutrient management plan and other policies safeguards are in place to improve water quality within the River Lugg	
To provide for sustainable sources of water supply	x	x	x	No relationship	
To avoid, reduce and manage flood risk	x	x	x	No relationship	

D3: Predict and evaluate the effects of the policies and sites within the Neighbourhood Development Plan

To conserve soil resources and quality	?	?	+	The policy is aiming to reduce the impact of large intensive livestock buildings.	
To minimise the production of waste					
To improve health of the population					
To reduce crime and nuisance					
To conserve natural and manmade resources	+	+	+	This policy is seeking to reduce the impact of large intensive livestock buildings on the natural and built environment.	
<b>Overall commentary and any cumulative effects</b>	This policy is seeking to ensure that the siting on any larger economic activity is minimised on the environment. This will have a positive effect on the baseline.				

## D3: Predict and evaluate the effects of the policies and sites within the Neighbourhood Development Plan

*Policy BNDP9: Landscape design principles*

SEA Objective	Assessment of effect (consider cumulative effects, significance of the effect and magnitude of the effect in terms of the three time periods)			Summary Explanation	Enhancement and mitigation opportunities
	Short term (1 – 5 years)	Medium term (6 – 10 years)	Long term (11 years +)		
To maintain and enhance nature conservation (biodiversity, flora and fauna)	++	++	++	The policy is seeking to protect landscape features including wildlife corridors, veteran trees and orchards. These are natural habitats for a variety of species, therefore would have a positive effect on this baseline	
To maintain and enhance the quality of landscapes and townscapes	++	++	++	The policy is seeking to protect a number of landscape features which contribute to the character of the villages and surrounding parish	
To improve quality of surroundings	++	++	++	The protection of these features will have a positive effect on the quality of the surroundings and	

## D3: Predict and evaluate the effects of the policies and sites within the Neighbourhood Development Plan

				the sense of place	
To conserve and where appropriate enhance the historic environment and cultural heritage	++	++	++	The protections of these features could have a positive effect on the cultural and historic setting of the villages and parish	
To improve air quality	+	+	+	The protection of natural features will help to improve and maintain the air quality	
To reduce the effect of traffic on the environment	x	x	x	No relationship	
To reduce contributions to climate change	+	+	+	The protection of these natural features will help to reduce greenhouse gases and contribute to reducing the effects of climate change	
To reduce vulnerability to climate change	+	+	+	The protection of these natural features will help to reduce greenhouse gases and contribute to reducing the effects of climate change	
To improve water quality	++	++	++	The Nutrient Management Plan and other policies will contribute to meeting the water quality	

D3: Predict and evaluate the effects of the policies and sites within the Neighbourhood Development Plan

				requirements within the River Lugg	
To provide for sustainable sources of water supply	x	x	x	No relationship	
To avoid, reduce and manage flood risk	+	+	+	The protection of areas of green and open space could provide flood storage and assist in the management of the known flood risk within the area	
To conserve soil resources and quality	++	++	++	The protection of areas of green and open space will help to maintain soil resources within and around the parish	
To minimise the production of waste					
To improve health of the population					
To reduce crime and nuisance					
To conserve natural and manmade resources	++	++	++	The principle aim of the policy is to protect features within the natural environment.	

## D3: Predict and evaluate the effects of the policies and sites within the Neighbourhood Development Plan

<b>Overall commentary and any cumulative effects</b>	The policy is seeking to protect a number of landscape and natural features. This will have a consequential positive effect of the other objectives.
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*Policy BNDP10:: Protection of local character*

SEA Objective	Assessment of effect (consider cumulative effects, significance of the effect and magnitude of the effect in terms of the three time periods)			Summary Explanation	Enhancement and mitigation opportunities
	Short term (1 – 5 years)	Medium term (6 – 10 years)	Long term (11 years +)		
To maintain and enhance nature conservation (biodiversity, flora and fauna)	++	++	++	Specific criteria exists within the policy to promote regard to the natural characteristics of the landscape. The reduction in street lighting will also have a positive effect on nocturnal species	
To maintain and enhance the quality of landscapes and townscapes	++	++	++	Specific criteria exists within the policy to promote regard to the landscape context and characteristics.	
To improve quality of	++	++	++	Specific criteria exists within the	



## D3: Predict and evaluate the effects of the policies and sites within the Neighbourhood Development Plan

surroundings				policy to promote regard to the natural and settlement characteristics within the landscape	
To conserve and where appropriate enhance the historic environment and cultural heritage	++	++	++	Specific criteria exists within the policy to promote regard to the historical character of settlements and buildings of heritage value	
To improve air quality	+	+	+	The protection of the landscape will have a consequential positive effect on air quality. The policy also seeks to promote cycling and walking to reduce reliance on the private car.	
To reduce the effect of traffic on the environment	+	+	+	The policy includes criteria to reduce the reliance on the private car and promote cycling and walking	
To reduce contributions to climate change	?	+	+	Protection of landscape features and the promoting of cycling and walking may in the longer term have some positive effects on contributions to reducing climate change	
To reduce vulnerability to climate change	x	x	x	No relationship	
To improve water	x	x	x	No relationship	

## D3: Predict and evaluate the effects of the policies and sites within the Neighbourhood Development Plan

quality					
To provide for sustainable sources of water supply	x	x	x	No relationship	
To avoid, reduce and manage flood risk	x	x	x	No relationship	
To conserve soil resources and quality	x	x	x	No relationship	
To minimise the production of waste					
To improve health of the population					
To reduce crime and nuisance					
To conserve natural and manmade resources	+	+	+	The policy is principally encouraging any development to be responsive to the natural environment and be designed to protect and enhance its surroundings	
<b>Overall commentary and any cumulative effects</b>	The policy is principally encouraging any development to be responsive to the natural environment and be designed to protect and enhance its surroundings. This is will have positive effect on many of the SEA objectives.				

## D3: Predict and evaluate the effects of the policies and sites within the Neighbourhood Development Plan

*Policy BNDP 11: Dark Skies*

SEA Objective	Assessment of effect (consider cumulative effects, significance of the effect and magnitude of the effect in terms of the three time periods)			Summary Explanation	Enhancement and mitigation opportunities
	Short term (1 – 5 years)	Medium term (6 – 10 years)	Long term (11 years +)		
To maintain and enhance nature conservation (biodiversity, flora and fauna)	+	++	++	The reduction of artificial lighting can have a positive effect on biodiversity particularly nocturnal animal	
To maintain and enhance the quality of landscapes and townscapes	+	+	+	The reduction of artificial lighting can have a positive effect on the quality of the landscape and townscape	
To improve quality of surroundings	+	+	++	The reduction of artificial lighting can have a positive effect on the quality of the landscape and townscape	

## D3: Predict and evaluate the effects of the policies and sites within the Neighbourhood Development Plan

To conserve and where appropriate enhance the historic environment and cultural heritage	?	+	+	The reduction of artificial lighting can have a positive effect on the quality of the landscape and townscape	
To improve air quality	x	x	x	No relationship	
To reduce the effect of traffic on the environment	x	x	x	No relationship	
To reduce contributions to climate change	x	x	x	No relationship	
To reduce vulnerability to climate change	x	x	x	No relationship	
To improve water quality	x	x	x	No relationship	
To provide for sustainable sources of water supply	x	x	x	No relationship	
To avoid, reduce and manage flood risk	x	x	x	No relationship	
To conserve soil resources and quality	x	x	x	No relationship	

D3: Predict and evaluate the effects of the policies and sites within the Neighbourhood Development Plan

To minimise the production of waste					
To improve health of the population					
To reduce crime and nuisance					
To conserve natural and manmade resources	+	+	+	This policy is seeking to reduce the impact of artificial lighting on the natural environment.	
<b>Overall commentary and any cumulative effects</b>	This policy is seeking to reduce the impact of artificial lighting on the natural environment.				

*Policy BDNP13: Renewable energy*

SEA Objective	Assessment of effect (consider cumulative effects, significance of the effect and magnitude of the effect in terms of the three time periods)			Summary Explanation	Enhancement and mitigation opportunities
	Short term (1 – 5 years)	Medium term (6 – 10 years)	Long term (11 years +)		

## D3: Predict and evaluate the effects of the policies and sites within the Neighbourhood Development Plan

To maintain and enhance nature conservation (biodiversity, flora and fauna)	?	+	+	This policy is locational and type dependent. However there are policy safeguards in place to ensure that negative effects on nature conservation are mitigated or avoided	
To maintain and enhance the quality of landscapes and townscapes	+	+	+	The policy is seeking to support small scale renewable energy schemes where appropriate. Policy safeguards exist within the plan.	
To improve quality of surroundings	+	+	+	The policy is seeking to support small scale renewable energy schemes where appropriate. Policy safeguards exist within the plan.	
To conserve and where appropriate enhance the historic environment and cultural heritage	?	+	+	The policy is seeking to support small scale renewable energy schemes where appropriate. Policy safeguards exist within the plan.	
To improve air quality	x	x	x	No relationship	
To reduce the effect of traffic on the environment	x	x	x	No relationship	

## D3: Predict and evaluate the effects of the policies and sites within the Neighbourhood Development Plan

To reduce contributions to climate change	+	+	+	The policy is seeking to support small scale renewable energy schemes where appropriate. This will help contribute to reducing climate change	
To reduce vulnerability to climate change	x	x	x	No relationship	
To improve water quality	x	x	x	No relationship	
To provide for sustainable sources of water supply	x	x	x	No relationship	
To avoid, reduce and manage flood risk	?	+	+	These policy is locational dependant. However policy safeguards exist within BNDP4 to ensure that mitigation and avoidance is in place	
To conserve soil resources and quality	?	+	+	The policy is aiming at small scale schemes, which will reduce the need for large areas of higher grade land	
To minimise the production of waste					
To improve health of the population					

D3: Predict and evaluate the effects of the policies and sites within the Neighbourhood Development Plan

To reduce crime and nuisance					
To conserve natural and manmade resources	+	+	+	This policy is seeking to encourage the production of renewable energy where possible	
<b>Overall commentary and any cumulative effects</b>	The policy is seeking to support small scale renewable energy schemes where appropriate. Sufficient policy safeguards exists to ensure that the effects on the SEA objectives are avoided or mitigated.				



# Appendix 8

Objectives and context	Where referenced in NDP/SEA
<ul style="list-style-type: none"> <li>• The Neighbourhood Development Plan's purpose and objectives are made clear.</li> <li>• The Neighbourhood Area's environmental issues and constraints, including acknowledgement of those in the Local Plan (Core Strategy) SA, where relevant, and local environmental protection objectives, are considered in developing objectives and targets.</li> <li>• SEA objectives are clearly set out and linked to indicators and targets where appropriate.</li> <li>• Links with other locally related plans, programmes and policies are identified, explained and acknowledgement for those set out in the SA of the Local Plan (Core Strategy) is given, where relevant.</li> <li>• Conflicts that exist between SEA and Neighbourhood Development Plan objectives; and between SEA objectives and other local plan objectives are identified and described.</li> </ul>	<ul style="list-style-type: none"> <li>• Section 1 (paras 1.8 – 1.9).</li> <li>• Sections 2 and 3; and Tables A2 and A3</li> <li>• Section 3 (para 3.7).</li> <li>• Section 3 (para 3.5).</li> <li>• Section 3 (paras 3.8 – 3.12)</li> </ul>
Scoping	
<ul style="list-style-type: none"> <li>• Statutory Consultees are consulted in appropriate ways and at appropriate times on the content and scope of the Environmental Report.</li> <li>• The assessment focuses on significant issues.</li> <li>• Technical, procedural and other difficulties encountered are discussed; assumptions and uncertainties are made explicit.</li> </ul>	<ul style="list-style-type: none"> <li>• Section 2 (paras 2.6 – 2.7) and Appendix 3</li> <li>• Sections 2 and 4</li> <li>• Sections 2 and 4</li> </ul>

<b>Alternatives</b>	
<ul style="list-style-type: none"> <li>Realistic alternatives are considered for key issues, and the reasons for choosing them are documented.</li> <li>Alternatives include 'do minimum' and/or 'business as usual' scenarios wherever relevant.</li> <li>The environmental effects (both adverse and beneficial) of each alternative are identified and compared.</li> <li>Inconsistencies between the alternatives and other relevant local plans, programmes or policies are identified and explained.</li> <li>Reasons are given for selection or elimination of alternatives.</li> </ul>	Section 5 (5.1 to 5.5)
<b>Baseline information</b>	
<ul style="list-style-type: none"> <li>Relevant aspects of the current state of the local, neighbourhood area environment and their likely evolution without the Neighbourhood Development Plan are described. Acknowledgement to the information in the SA of the Local Plan (Core Strategy) is given, where relevant.</li> <li>Environmental characteristics of the local, neighbourhood area, likely to be significantly affected are described, including areas wider than the physical boundary of the designated neighbourhood area, where it is likely to be affected by the Neighbourhood Development Plan.</li> <li>Difficulties such as deficiencies in information or methods are explained.</li> </ul>	<ul style="list-style-type: none"> <li>Section 1 and 4.</li> <li>Initial screening report and Section 1.</li> <li>Section 2.</li> </ul>

<b>Prediction and evaluation of likely significant environmental effects</b>	
<ul style="list-style-type: none"> <li>• Effects identified include the types listed in the Directive (biodiversity, population, human health, fauna, flora, soil, water, air, climate factors, material assets, cultural heritage and landscape), as relevant; and other local likely environmental effects are also covered, as appropriate.</li> <li>• Both positive and negative effects are considered, and the duration of effects (short, medium or long-term) is addressed.</li> <li>• Likely secondary, cumulative (growing in quantity and strength) and synergistic (acting together) effects are identified, where practicable.</li> <li>• Inter-relationships between effects are considered, where practicable.</li> <li>• The prediction and evaluation of effects makes use of relevant accepted standards, regulations, and thresholds (i.e. data gathered for the evidence base).</li> <li>• Methods used to evaluate the effects are described.</li> </ul>	<ul style="list-style-type: none"> <li>• Tables A2, A3 and A4 (Appendix 2)</li> <li>• Tables B2 and B3 (Appendix 4), Table D2 and D3 (Appendix 7)</li> <li>• Table B4 (Appendix 4)</li> <li>• Section 4</li> <li>• Section 4</li> <li>• Section 2</li> </ul>
<b>Mitigation measures</b>	
<ul style="list-style-type: none"> <li>• Measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the Neighbourhood Development Plan are indicated.</li> <li>• Issues to be taken into account when determining planning applications or other projects, for example funding bids, are identified.</li> </ul>	<ul style="list-style-type: none"> <li>• Section 6</li> <li>• Section 4</li> </ul>

<b>The Environmental Report</b>	
<ul style="list-style-type: none"> <li>• Is clear and concise in its layout and presentation.</li> <li>• Uses simple, clear language and avoids or explains technical terms.</li> <li>• Uses maps and other illustrations, where appropriate.</li> <li>• Explains the methodology used.</li> <li>• Explains who was consulted and what methods of consultation were used.</li> <li>• Identifies sources of information, including expert judgement and matters of opinion.</li> <li>• Contains a non-technical summary covering the overall approach to the SEA, the objectives of the Neighbourhood Development Plan, the main options considered, and any changes to the Neighbourhood Development Plan resulting from the SEA.</li> </ul>	<ul style="list-style-type: none"> <li>• N/A</li> <li>• N/A</li> <li>• N/A</li> <li>• Section 2</li> <li>• Section 2</li> <li>• Section 2</li> <li>• Included at page 1</li> </ul>
<b>Consultation</b>	
<ul style="list-style-type: none"> <li>• The SEA is consulted on as an integral part of the plan-making process of the Neighbourhood Development Plan.</li> <li>• Consultation Bodies and the public likely to be affected by, or having an interest in, the Neighbourhood Development Plan are consulted in ways and at times, which give them an early and effective opportunity within appropriate time frames to express their opinions on the draft Neighbourhood Development Plan and Environmental Report.</li> </ul>	<ul style="list-style-type: none"> <li>• Section 2 (paras 2.4 – 2.5)</li> <li>• Section 6</li> </ul>

<b>Decision-making and information on the decision</b>	
<ul style="list-style-type: none"> <li>The environmental report and the opinions of those consulted are taken into account in finalising and adopting the Neighbourhood Development Plan.</li> <li>An explanation is given of how they have been taken into account.</li> <li>Reasons are given for choosing the Neighbourhood Development Plan as adopted, in the light of other reasonable alternatives considered.</li> </ul>	<ul style="list-style-type: none"> <li>Sections 2 and 6</li> <li>Section 6</li> <li>Section 6</li> </ul>
<b>Monitoring measures</b>	
<ul style="list-style-type: none"> <li>Measures proposed for monitoring the Neighbourhood Development Plan are clear, practicable and linked to the indicators and objectives used in the SEA.</li> <li>Monitoring is used, where appropriate, during implementation of the Neighbourhood Development Plan to make good deficiencies in baseline information in the SEA.</li> <li>Acknowledgement that monitoring enables unforeseen adverse effects to be identified at an early stage. (These effects may include predictions which prove to be incorrect.)</li> <li>Proposals are made for action in response to significant adverse effects arising from the monitoring of the Neighbourhood Development Plan.</li> </ul>	<ul style="list-style-type: none"> <li>Section 5</li> <li>Section 5</li> <li>Section 5</li> <li>Section 5</li> </ul>