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Herefordshire Draft Core Strategy

Habitats Regulations Assessment Report

Prepared by LUC
March 2013

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1 Introduction

- 1.1 Herefordshire Council is producing a Core Strategy, in order to set out the vision, spatial strategy and core policies for the spatial development of the county up to 2031. The Core Strategy will form part of Herefordshire's Local Development Framework (LDF).
- 1.2 LUC was appointed by Herefordshire Council in 2009 to undertake Habitats Regulations Assessment (HRA) of the Herefordshire Core Strategy on its behalf. This report relates to the HRA of the Draft Core Strategy (March 2013).

HRA work undertaken to date for the Herefordshire Core Strategy

- 1.3 Herefordshire Council began the HRA process in relation to the Core Strategy internally, producing the following documents:
 - Developing Options Paper HRA Screening Report (June 2008)
 - Developing Options Paper HRA Screening Report Addendum (April 2009)
 - Joint SA and HRA Report for the Place Shaping Paper (January 2010)
- 1.4 Preferred Options for the policies and spatial options within the Core Strategy were then produced by the Council. These Preferred Options were prepared in three batches, and were subject to targeted consultations during summer 2010. Each batch of policies was subject to HRA by LUC, and an initial HRA report was produced in relation to the first batch. An HRA note was then prepared to report on the findings of the HRA of the Hereford policies and was made available to Herefordshire Council internally. A full updated HRA report (November 2010) was then produced, presenting the findings of the HRA of all of the Preferred Options for the Core Strategy policies. This includes Preferred Options relating to:
 - Spatial Options for Hereford, Ledbury, Bromyard and Ross-on-Wye
 - Rural areas
 - General Policies, covering:
 - Affordable housing
 - Economy and employment
 - Tourism
 - Gypsy and Traveller sites
 - Natural and built heritage assets
 - Minerals
 - Waste
 - Movement
 - Open space, sport and recreation
 - Social and community infrastructure
 - Sustainable strategic design
 - Sustainable water management
 - Renewable energy
 - Infrastructure contributions
- 1.5 Following the publication of the Preferred Options, the Council published revisions to the Preferred Options for the rural areas, Hereford, Leominster and Ross-on-Wye. There were various reasons for these revisions, which were described in full in Herefordshire Council's Herefordshire LDF Core Strategy Revised Preferred Options Background Paper (September 2011) and include:
 - The impact of the recession and the downturn in the housing market.

- Publication of the latest Government Household Projections, which indicated a smaller increase in the number of households likely to exist in the county in the future than previous projections.
- The requirement for the Core Strategy to set out proposals for housing delivery over a 15 year period – as a result of delays in advancing the Core Strategy this would no longer be possible without extending or rebasing the plan period.
- Consultation responses received in 2010 in relation to the emerging Preferred Options, which showed significant opposition to the scale of new housing development proposed, particularly in Hereford.

1.6 The HRA findings for the relevant Preferred Options were also revisited by LUC, in order to reflect the revisions made, and the findings were prepared in an HRA Note for the Revised Preferred Options (August 2011). In the case of Leominster, a Preferred Option for development in the town was established at the Place Shaping Paper stage. However the Preferred Option for Leominster in the Place Shaping Paper did not include the same level of detail as the Preferred Options for the other market towns when they were developed in 2010, and the Preferred Option for Leominster had not been developed further since the Place Shaping Paper. As such, the findings of the HRA work that was undertaken in relation to the Preferred Option for Leominster at the Place Shaping Paper stage were taken into account in the August 2011 HRA report. The revised Preferred Option for Leominster had changed from the preferred option, so it was again subject to both the Screening and Appropriate Assessment stages of the HRA at that stage alongside the revised Preferred Options for the remainder of the Core Strategy, in order to ensure that the likely impacts of development at Leominster were adequately taken into account both individually and in combination with the other Preferred Options.

1.7 The Preferred Options (including the Revised Preferred Options) have now been developed into more detailed policies and are presented together in the Draft Herefordshire Core Strategy (March 2013) which is the subject of this HRA report. The essence of the overriding strategy for the development of the county in terms of housing numbers has not changed since Revised Preferred Options stage. An outline of the structure of the Draft Core Strategy is provided in **Chapter 2**.

Relevant work used to inform the HRA of the Herefordshire Core Strategy

1.8 The findings from the earlier stages of the HRA have helped to inform the conclusions of the HRA for the Draft Herefordshire Core Strategy, as described in the following chapters. In addition to the HRA work undertaken for the Core Strategy itself, a separate HRA report has been prepared for the route options considered for the Hereford Relief Road¹, and the findings of that work have also informed the HRA of the overall Core Strategy where relevant. Finally, following publication of the 2010 HRA Report, and in view of objections from Natural England regarding the potential for significant effects on the water quality of the River Wye SAC (which currently includes sections where the water quality exceeds phosphate level targets defined in Natural England's favourable condition tables) Herefordshire Council established a Water Steering Group comprising officers from the Council, Natural England, the Environment Agency and Dwr Cymru Welsh Water. This group has met a number of times to discuss and try to seek a solution. David Tyldesley & Associates (DTA) was also commissioned to provide advice to the Council on this matter. The key outcomes and outputs of the Water Steering Group discussions have been:

- A signed **Statement of Intent** (signed 15th February 2013), which is a formal commitment between Natural England and the Environment Agency to develop and deliver a Nutrient Management Plan for the River Wye SAC in England.
- The proposed **Nutrient Management Plan** (NMP) for the River Wye SAC, which will embody measures which will ensure the favourable conservation status of the SAC in respect of phosphate levels as soon as possible and at the latest by 2027 taking into account the existing river phosphate levels and existing water discharge permits. The NMP will also seek to identify actions that would enable additional development (beyond existing consents) to proceed during the period 2013 to 2031 of the type and amount, and in the locations specified

¹ *Hereford Relief Road Habitats Regulations Assessment – Route Corridor Options Screening Report*. Hyder Consulting (UK) Limited, April 2011.

in or pursuant to the emerging Herefordshire Core Strategy and other relevant development plans.

- An emerging **Memorandum of Understanding** between Herefordshire Council and Dwr Cymru Welsh Water in relation to maintaining their current operating practices at the Eign and Rotherwas Waste Water Treatment Works (WWTW) (known as the 'Hereford City' WWTW).

1.9 The relevance of these documents is helpfully explained in a paper prepared by DTA called "*Informing the Habitats Regulations Assessment of the Herefordshire Core Strategy – The River Wye SAC*" (DTA, 19 February 2013) (referred to hereafter as 'the DTA paper'). Further reference to these documents is made where relevant in the following chapters of this HRA Report.

The requirement to undertake Habitats Regulations Assessment of development plans

1.10 The requirement to undertake HRA of development plans was confirmed by the amendments to the "Habitats Regulations" published for England and Wales in July 2007 and updated in 2010². Therefore, when preparing its Core Strategy, Herefordshire Council is required by law to carry out an assessment known as "Habitats Regulations Assessment".

1.11 HRA is an impact-led assessment (in contrast to Sustainability Appraisal which adopts an 'objectives-led' approach), and refers to the assessment of the potential effects of a development plan on one or more European sites, including Special Protection Areas (SPAs) and Special Areas of Conservation (SACs):

- **SPAs** are classified under the European Council Directive 'on the conservation of wild birds' (79/409/EEC; 'Birds Directive') for the protection of **wild birds and their habitats** (including particularly rare and vulnerable species listed in Annex 1 of the Birds Directive, and migratory species).
- **SACs** are designated under the Habitats Directive and target **particular habitats** (Annex 1) and/or species (Annex II) identified as being of European importance.

1.12 As a matter of Government policy, potential SPAs (pSPAs), candidate SACs (cSACs) and Ramsar sites are also expected to be included within the assessment.

- **Ramsar sites** support internationally **important wetland habitats** and are listed under the Convention on Wetlands of International Importance especially as Waterfowl Habitat (Ramsar Convention, 1971).

1.13 For ease of reference during HRA, general practice has been that these three designations are collectively referred to as either **Natura 2000** or **European sites**, (the latter despite Ramsar designations being at the international level).

1.14 The HRA of development plans is undertaken in stages (as described below) and should conclude whether or not a proposal or policy in a development plan would adversely affect the integrity of the site in question. This is judged in terms of the implications of the plan for a site's 'qualifying features' (i.e. those Annex I habitats, Annex II species, and Annex I bird populations for which it has been designated) and are measured with reference to the conservation objectives for those qualifying features as defined by Natural England. Significantly, HRA is based on the precautionary principle, such that where uncertainty or doubt remains, an adverse impact should be assumed.

² *The Conservation (Natural Habitats, &c.) (Amendment) Regulations 2007*. HMSO Statutory Instrument 2007 No. 1843. From 1 April 2010, these were consolidated and replaced by the *Conservation of Habitats and Species Regulations 2010* (SI No. 2010/490).

Stages of the Habitats Regulations Assessment

1.15 **Table 1.1** below summarises the stages involved in carrying out a full HRA, based on various guidance documents^{3,4,5}.

Table 1.1 Stages in HRA

Stage	Task	Outcome
Stage 1: Screening	Description of the plan. Identification of potential effects on European Sites. Assessing the effects on European Sites (taking into account potential mitigation provided by other policies in the plan).	Where effects are unlikely, prepare a 'finding of no significant effect report'. Where effects judged likely, or lack of information to prove otherwise, proceed to Stage 2.
Stage 2: Appropriate Assessment	Gather information (plan and European Sites). Impact prediction. Evaluation of impacts in view of conservation objectives. Where impacts considered to affect qualifying features, identify alternative options. Assess alternative options. If no alternatives exist, define and evaluate mitigation measures where necessary.	Appropriate assessment report describing the plan, European site baseline conditions, the adverse effects of the plan on the European site, how these effects will be avoided through, firstly, avoidance, and secondly, mitigation including the mechanisms and timescale for these mitigation measures. If effects remain after all alternatives and mitigation measures have been considered proceed to Stage 3.
Stage 3: Assessment where no alternatives exist and adverse impacts remain taking into account mitigation	Identify 'imperative reasons of overriding public interest' (IROPI). Identify potential compensatory measures.	This stage should be avoided if at all possible. The test of IROPI and the requirements for compensation are extremely onerous.

1.16 In assessing the effects of the Core Strategy in accordance with Regulation 102 of the Conservation of Habitats and Species Regulations 2010, there are potentially two tests to be applied by the competent authority, a "Significance Test", followed if necessary by an appropriate assessment which will inform the "Integrity Test". The relevant sequence of questions is as follows:

- Step 1: Under Reg. 102(1)(b), consider whether the plan is directly connected with or necessary to the management of the sites. If not –
- Step 2: Under Reg. 102(1)(a) consider whether the plan is likely to have a significant effect on the site, either alone or in combination with other plans or projects ("the Significance

³ *Assessment of plans and projects significantly affecting European Sites. Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC.* European Commission Environment DG, November 2001.

⁴ *Planning for the Protection of European Sites. Guidance for Regional Spatial Strategies and Local Development Documents.* Department for Communities and Local Government (DCLG), August 2006.

⁵ *The Appropriate Assessment of Spatial Plans in England. A guide to why, when and how to do it.* RSPB. August 2007.

Test"). [These two steps are undertaken as part of Stage 1: Screening shown in Table 1.1 above.] If Yes –

- Step 3: Under Reg. 102(1), make an appropriate assessment of the implications for the site in view of its current conservation objectives. In so doing, it is mandatory under Reg. 102(2) to consult Natural England, and optional under Reg. 102(3) to take the opinion of the general public. [This step is undertaken during Stage 2: Appropriate Assessment shown in Table 1.1 above.]
- Step 4: In accordance with Reg.102(4), but subject to Reg.103, give effect to the land use plan only after having ascertained that the plan will not adversely affect the integrity of the European site.

1.17 It is normally anticipated that an emphasis on Stages 1 and 2 of this process will, through a series of iterations, help ensure that potential adverse effects are identified and eliminated through the inclusion of mitigation measures designed to avoid, reduce or abate effects. The need to consider alternatives could imply more onerous changes to a plan document. It is generally understood that so called 'imperative reasons of overriding public interest' (IROPI) are likely to be justified only very occasionally and would involve engagement with both the Government and European Commission.

1.18 The HRA should be undertaken by the 'competent authority'; in this case Herefordshire Council, and LUC has been commissioned to do this on its behalf. The HRA also requires close working with Natural England as the statutory nature conservation body⁶ in order to obtain the necessary information and agree the process, outcomes and any mitigation proposals. The Environment Agency, while not a statutory consultee for the HRA, is also in a strong position to provide advice and information throughout the process as it is required to undertake HRA for its existing licences and future licensing of activities. Herefordshire Council has worked closely with Natural England and the Environment Agency throughout the HRA process, as described in **Chapter 2**. The Countryside Council for Wales (CCW) has also been consulted at appropriate stages due to the fact that Herefordshire borders Wales, and some of the European sites that could be affected are in Wales.

Potential impacts of the Herefordshire Core Strategy on European sites

1.19 As the Herefordshire Core Strategy includes proposals for future development in the county (including residential commercial, retail, minerals, waste, tourism, renewable energy and community developments), it is necessary to consider the types of impacts that development in general may have on European sites. **Table 1.2** below sets out the range of potential impacts and operations that development may have on European sites.

Table 1.2 Potential impacts and operations adversely affecting European sites

Broad categories (in bold), and examples, of potential impacts on European sites	Examples of operations responsible for impacts
<p>Physical loss</p> <ul style="list-style-type: none"> - Removal (including offsite effects, e.g. foraging habitat) - Mine collapse - Smothering - Habitat degradation 	<ul style="list-style-type: none"> Development (e.g. housing, employment, infrastructure, tourism, flood defences) Infilling (e.g. of mines, water bodies) Alterations or works to disused quarries Structural alterations to buildings (bat roosts) Afforestation Tipping Cessation of or inappropriate management for

⁶ Regulation 5 of *The Conservation of Habitats and Species Regulations 2010*. HMSO Statutory Instrument 2010 No. 490.

Broad categories (in bold), and examples, of potential impacts on European sites	Examples of operations responsible for impacts
	nature conservation
<p>Physical damage</p> <ul style="list-style-type: none"> - Sedimentation / silting - Prevention of natural processes - Habitat degradation - Erosion - Trampling - Fragmentation - Severance / barrier effect - Edge effects - Fire 	<p>Flood defences Port activity Dredging Mineral extraction Recreation (e.g. motor cycling, cycling, walking, horse riding, water sports, caving) Development (e.g. infrastructure, tourism, adjacent housing etc.) Vandalism Arson Cessation of or inappropriate management for nature conservation</p>
<p>Non-physical disturbance</p> <ul style="list-style-type: none"> - Noise - Visual presence - Human presence - Light pollution - Vibration 	<p>Development (e.g. housing, industrial) Recreation (e.g. dog walking, water sports) Industrial activity Mineral extraction Navigation Vehicular traffic Artificial lighting (e.g. street lighting)</p>
<p>Water table/availability</p> <ul style="list-style-type: none"> - Drying - Flooding / stormwater - Water level and stability - Changes in coastal water levels - Water flow (e.g. reduction in velocity of surface water) - Barrier effect (on migratory species) - Changes in water temperature - Changes in periodicity of high/low flows 	<p>Water abstraction Drainage interception (e.g. reservoir, dam, infrastructure and other development) Coastal defences Increased discharge (e.g. drainage, runoff)</p>
<p>Toxic contamination</p> <ul style="list-style-type: none"> - Water pollution - Soil contamination - Air pollution 	<p>Agrochemical application and runoff Diffuse air and soil pollution Navigation Oil / chemical spills Tipping Storm water runoff Vehicular traffic Emissions/spills from waste management facilities</p>
<p>Non-toxic contamination</p> <ul style="list-style-type: none"> - Nutrient enrichment (e.g. of soils and water) - Algal blooms - Changes in salinity 	<p>Agricultural runoff Sewage discharge Water abstraction Industrial activity Flood defences</p>

Broad categories (in bold), and examples, of potential impacts on European sites	Examples of operations responsible for impacts
<ul style="list-style-type: none"> - Changes in thermal regime - Changes in turbidity - Air pollution (dust) 	Navigation Construction
Biological disturbance <ul style="list-style-type: none"> - Direct mortality - Disturbance to flight lines, migration routes, roosting, foraging and breeding areas - Out-competition by non-native species - Selective extraction of species - Introduction of disease - Rapid population fluctuations - Natural succession 	Development (e.g. housing areas with domestic and public gardens) Predation by domestic pets Introduction of non-native species (e.g. from gardens) Fishing Hunting Agriculture Changes in management practices (e.g. grazing regimes, access controls, cutting / clearing)

Structure of the HRA report

- 1.20 This chapter has introduced the Draft Herefordshire Core Strategy and the requirement to conduct HRA. The remainder of the report is set out in the following sections:
- **Chapter 2 – Stage 1: Screening – Methodology:** Sets out the approach that has been taken to Stage 1 of the HRA.
 - **Chapter 3 – Stage 1: Screening Conclusions for the Draft Herefordshire Core Strategy:** Summarises the findings of the HRA Screening for the Draft Core Strategy.
 - **Chapter 4 – Stage 2: Appropriate Assessment – Methodology and Findings:** Describes the approach taken to Stage 2 of the HRA and summarises the key findings.
 - **Chapter 5 – Conclusions and Next Steps:** Draws together the findings of the HRA to date and outlines the next steps to be undertaken.
- 1.21 The information in the main body of the report is supplemented by a number of appendices:
- **Appendix 1** presents the HRA Screening matrix.
 - **Appendix 2** presents the review of other plans and programmes that could potentially lead to in-combination effects with the Herefordshire Core Strategy.

2 Stage 1: Screening - Methodology

- 2.1 As the Herefordshire Core Strategy is not directly connected with the management of any European sites, and includes proposals for development which may affect European sites, it is necessary under Regulation 102(1)(a) of the Habitats Regulations 2010 to undertake screening for likely significant effects on European sites. Once it is established that a development plan requires HRA, the HRA generally involves three stages (Screening, Appropriate Assessment, and Assessment where no alternatives exist), as shown in **Table 1.1** in **Chapter 1**.
- 2.2 This chapter sets out the approach that has been taken to Stage 1 (Screening) of the HRA of the Herefordshire Draft Core Strategy and the screening conclusions are summarised in **Chapter 3**. The screening stage involves assessing broadly whether the Draft Core Strategy is likely to have a significant effect on any European site(s), and therefore requires an 'Appropriate Assessment' of whether this would result in an adverse effect on integrity of the European site(s) in question. Stage 2: Appropriate Assessment is described in **Chapter 4** of this report.

Screening of Developing Options and Place Shaping Paper (2008-2010)

- 2.3 As already described, HRA Screening was first undertaken by Herefordshire Council at the Developing Options stage, and the findings from that initial screening exercise were reported on in June 2008. All sites within the county (+15km) were screened on the basis of the strategic options set out in the Developing Options paper. The report was then updated via the publication of an Addendum in April 2009, following an HRA workshop that took place in August 2008. A joint SA and HRA report was then produced in January 2010, in relation to the Place Shaping Paper consultation. Natural England responded to the consultation on the joint SA/HRA report, noting that the report had correctly identified the suite of European sites that could potentially be affected by the Core Strategy options and that should therefore go through to the Appropriate Assessment stage, as well as the types of effects that could occur.

Screening of Preferred Options (2010)

- 2.4 As described in **Chapter 1**, a set of Preferred Options for the Core Strategy was produced by Herefordshire Council and subject to HRA screening by LUC in order to identify those proposals which were likely to significantly affect the integrity of European sites, and which therefore needed to be taken through to the Appropriate Assessment stage of the HRA. The findings of the screening of the Core Strategy Preferred Options were presented in the HRA Report for the Preferred Options (November 2010).
- 2.5 An HRA workshop was held on 4th August 2010, prior to which an interim HRA Report was prepared. At the workshop, representatives from Natural England, CCW and Welsh Water raised comments with regards to this Interim HRA Report and CCW also provided a detailed response in writing. This was drawn upon during the preparation of the full HRA report (November 2010), as described in that report (CCW's written consultation response can be found in Appendix 3 of that report). A further HRA meeting was then held on 16th November 2010 between LUC, Herefordshire County Council, Natural England, the Environment Agency and a representative from Hyder Consulting (who carried out the HRA of the proposed Hereford relief road). At this meeting, further discussion took place regarding the emerging findings of the full HRA which were documented in the November 2010 HRA report.
- 2.6 Following the production of the revised Preferred Options for some of the Hereford, Ross-on-Wye and rural areas proposals, the screening findings for the relevant Preferred Options were revisited

and the findings of that exercise were presented in an HRA Note for the Revised Preferred Options (August 2011).

European sites screened out at earlier stages in the HRA

- 2.7 The June 2008 HRA Screening Report was able to conclude that Lyppard Grange Ponds SAC (designated for the Great Crested Newts that the ponds support) was unlikely to be significantly affected by any proposals in the Herefordshire Core Strategy (either at Developing Options stage or further ahead in its preparation) due to its distant location in Worcestershire, within a built up residential area. It was concluded that any new development in Herefordshire was unlikely to have any additional, in-combination, or adverse effect on the ponds (and thus the Great Crested Newts) from recreational pressure, fish introductions or control of Stickleback. Therefore, Lyppard Grange Ponds SAC has not been considered further in this HRA Report.
- 2.8 In addition, the conclusion reached at the Developing Options stage in 2009 that some of the sites within 15km of the County boundary are unlikely to have a significant effect from implementation of the Herefordshire Core Strategy, remains in this version of the HRA of the Draft Herefordshire Core Strategy. These sites are as follows:
- Coed y Cerrig SAC
 - Cwm Clydach Woodlands SAC
 - Seven Estuary Ramsar/SPA
 - Sugar Loaf Woodlands SAC
 - Walmore Common Ramsar/SPA
- 2.9 This conclusion is due to one or all of the following reasons (as explained in Appendix 1 of the HRA Screening Addendum March 2009): the distance of the European site from the strategic development locations within Herefordshire; a lack of pathway between sources of impact and the qualifying features of the site; a management plan in place to help reduce existing pressures. Upon review during this iteration of the HRA screening, and based on the interpretation of the opinion from the 'Sweetman' case described below, it is concluded that any impact associated with development in Herefordshire is likely to have no appreciable effect on these European sites, and therefore they are not likely to be significantly affected.
- 2.10 However, the potential for some impacts identified (recreation, air pollution, changes in hydrology due to abstraction) to combine with similar impacts from neighbouring authorities' development plans has been considered for these European sites. Although, as set out in the DTA paper (referred to in Chapter 1), the effects of the other plans or projects, would need to combine with the residual effects of the Core Strategy on these European sites in ways that would make the Core Strategy's effects more likely to occur or to be significant.

Screening of the Draft Core Strategy (2013)

- 2.11 The HRA screening of the Draft Herefordshire Core Strategy (March 2013) has now been undertaken in line with current available guidance and seeks to meet the requirements of the Habitats Regulations. The screening stage needed to be carried out again because the full suite of policies now presented in the Draft Core Strategy have not all been screened under the Habitats Regulations, and a number of the draft policies have changed significantly from the Preferred Options and Revised Preferred Options that were subject to HRA screening in 2010 and 2011.
- 2.12 The tasks that have been completed during the HRA screening of the Draft Core Strategy are described in detail below. Certain tasks involved in the process, such as identifying the European sites within and around Herefordshire, did not need to be undertaken again at this stage as the findings of the earlier screening work remain valid.

Identification of European sites which may be affected by the Herefordshire Core Strategy and the factors contributing to and defining the integrity of these sites

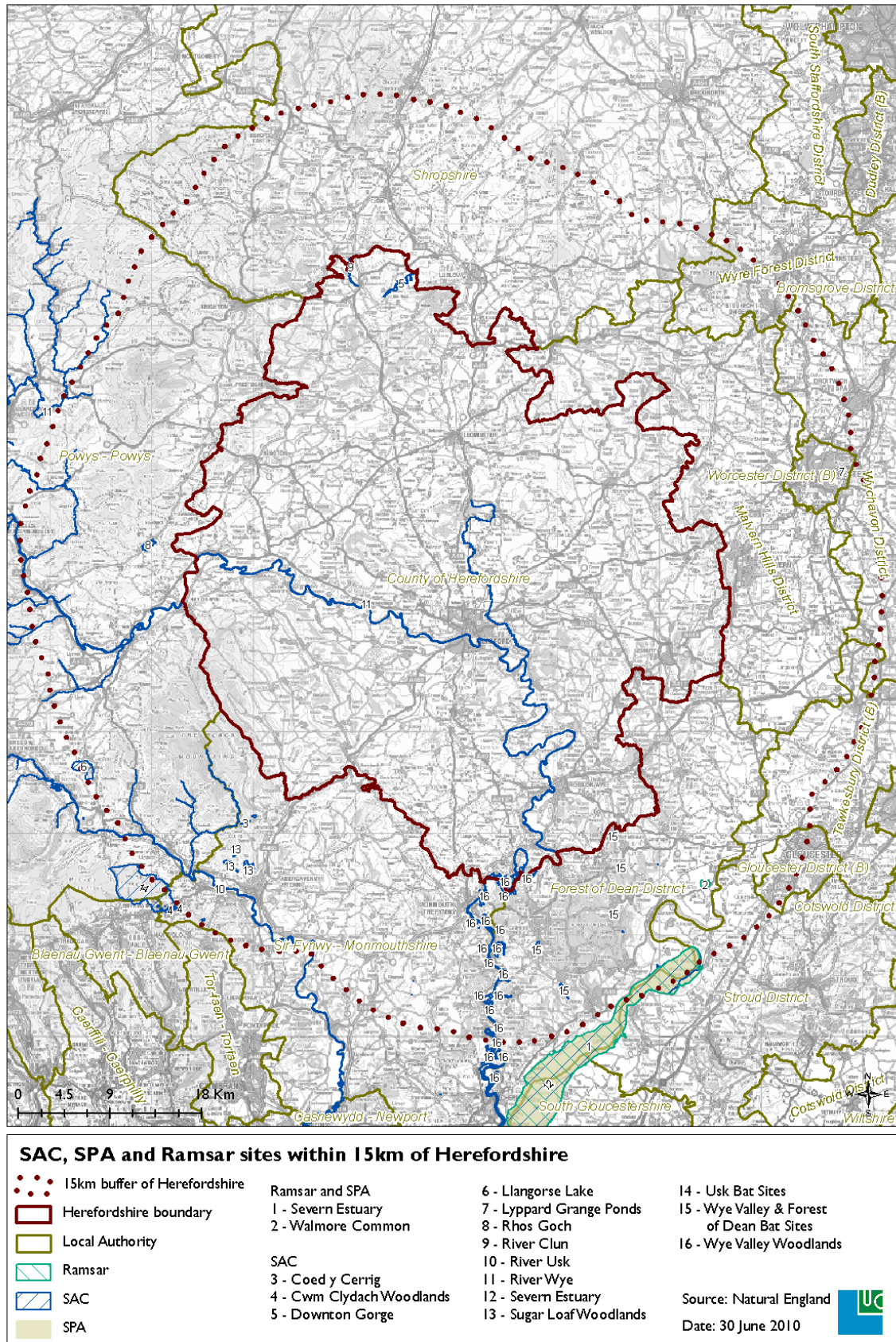
- 2.13 The June 2008 Screening Report that was produced by Herefordshire County Council for the Developing Options identified the European sites located within Herefordshire (see Appendix 2 within that report). In line with the precautionary approach, European sites lying partially or wholly within 15km of the county boundary were also included in the assessment, in order to address the fact that proposals in the Herefordshire Core Strategy may affect European sites outside the administrative boundary of the plan. The distance of 15km was considered appropriate to ensure that all designated sites outside the county boundary that could be affected by development within Herefordshire were identified and included in the assessment. Where sites lie partially within 15km of the county boundary, the potential for effects on the whole of those sites has been considered.
- 2.14 The European sites identified within Herefordshire (+15km), and which have the potential to be affected by the Core Strategy, are listed below in **Table 2.1** and are mapped in **Figure 2.1**.

Table 2.1 European Sites within the Herefordshire County Boundary (+15km)

Special Areas of Conservation (SACs)	Special Protection Areas (SPAs)	Ramsar Sites
Sites inside the boundary		
Downton Gorge		
River Clun		
River Wye		
Wye Valley Woodlands		
Sites within 15km of the boundary		
Coed y Cerrig	Severn Estuary	Severn Estuary
Cwm Clydach Woodlands	Walmore Common	Walmore Common
Llangorse Lake		
Lyppard Grange Ponds		
Rhos Goch		
River Usk		
Severn Estuary		
Sugar Loaf Woodlands		
Usk Bat Sites		
Wye Valley and Forest of Dean Bat Sites		

The attributes of these sites which contribute to and define their integrity were described (see Appendix 3 of the June 2008 HRA Screening Report) and European site interest features and relevant conservation objectives were also highlighted. This information made it possible to identify the features of each site which determine site integrity, as well as the specific sensitivities of each site, therefore enabling later analysis of how the potential impacts of the Herefordshire Core Strategy may affect site integrity.

Figure 2.1: European sites within 15km of Herefordshire County boundary



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Description of the Herefordshire Core Strategy

- 2.15 The Draft Herefordshire Core Strategy (March 2013) presents detailed policies for development in the county up to 2031. The first section introduces the Core Strategy and the second provides the context for the Plan, describing the county and the key issues and challenges that it faces.
- 2.16 The third part of the Draft Core Strategy includes the overarching vision and objectives of the Core Strategy, and sets out the overall spatial strategy, which is detailed in six specific policies, covering:
- Sustainable development
 - Housing distribution
 - Release of housing
 - Movement and transportation
 - Employment provision
 - Climate change
- 2.17 Section four sets out 21 place-shaping policies which relate to development in:
- Hereford
 - Bromyard
 - Leominster
 - Ledbury
 - Ross-on-Wye
 - Kington
 - Rural areas
- 2.18 Section five then sets out 36 general policies, which relate to:
- Housing
 - Social and community facilities
 - Open space, sport and recreation
 - Traffic management
 - Employment
 - Tourism
 - Retail
 - Local distinctiveness
 - Sustainable design
 - Natural resources: minerals
 - Waste
- 2.19 Section six of the Draft Core Strategy then describes how the Plan will be delivered, implemented and monitored, and includes one policy relating to infrastructure delivery.

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

- 2.20 Regulation 102 of the Habitats Regulations 2010 requires an appropriate assessment where a land use plan (not directly connected with or necessary to the management of the site) is likely to have a significant effect on a European site, either alone or in combination with other plans or projects. In order to try to identify potential 'in-combination' effects consideration has been given to other plans with any components that could have an impact on European sites within the Plan area boundary (+15km), i.e. those plans which include areas or towns where additional development is proposed near to the European sites within 15km of Herefordshire's boundary (as

there could be effects from transport, water use, infrastructure and recreation pressures associated with new developments).

- 2.21 There are a large number of potentially relevant plans and projects which may result in in-combination effects with the Herefordshire Core Strategy. A targeted review of plans was undertaken and has been updated for this HRA report, focusing on planned spatial growth within the adjacent authorities to Herefordshire (see **Appendix 2**). The review focused on the spatial strategies and policies included in the Core Strategies and Local Plans for the Forest of Dean, Malvern Hills, Shropshire, Monmouthshire and Powys. The most recent HRA reports for those plans were also reviewed where available, as a guide to the potential for any of the policies and proposals in those plans to have adverse effects on the European sites being considered in the HRA of Herefordshire’s Core Strategy. Where likely significant effects have been identified, or were not able to be ruled out for these other plans, their potential to combine with effects from the Herefordshire Core Strategy has been considered.
- 2.22 The Water Cycle Study for Herefordshire⁷ was also drawn upon in the 2010-11 HRA reports, as it collates information from available water resource management plans within the county, which helps to indicate the potential for planned water abstraction requirements to combine with pressures on European sites from the Core Strategy. The more up to date Water Resource Management Plans were consulted for this HRA report. In the HRA for the final Dwr Cymru Welsh Water WRMP⁸ it notes that the Environment Agency’s Review of Consents exercise already completed an ‘in combination’ assessment for all currently licensed abstractions (and many unlicensed abstractions), which underpins the WRMP. In addition, the WRMP explicitly accounts for land-use plans and growth forecasts when calculating future water demand (and hence areas with potential deficits).
- 2.23 In addition, the work of the Water Steering Group established by Herefordshire Council with Natural England, Environment Agency, Dwr Cymru Welsh Water, and in particular the Statement of Intent to prepare a Nutrient Management Plan for the River Wye SAC, has also been considered as part of the in-combination assessment, especially with respect to the measures that will be implemented as part of the Nutrient Management Plan to ensure the favourable conservation status of the SAC in respect of phosphate levels as soon as possible and at the latest by 2027.

Assessment of the ‘likely significant effects’ of the Herefordshire Core Strategy

- 2.24 As required under Regulation 102 of the Habitats Regulations 2010, a screening assessment of the ‘likely significant effects’ of the Draft Herefordshire Core Strategy (March 2013) (alone and in combination with other plans or projects) has been undertaken. A screening matrix was prepared in order to identify whether any of the Draft Core Strategy policies would be likely to have a significant effect on one or more European sites. The findings of the screening assessment of the Draft Core Strategy can be seen in **Appendix 1**, and are summarised further ahead in this chapter. Colour coding was used to record the likely impacts of the policies on European sites and their qualifying habitats and species, as shown in **Table 2.2** below.

Table 2.2 Key to Colour Coding used in the HRA Screening Matrix

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

Assumptions and information used in reaching conclusions about likely significant effects

- 2.25 The screening component of the HRA took the approach of screening each policy individually, which is consistent with current guidance documents. Using the broad categories of impact

⁷ Herefordshire Outline Water Cycle Study Brian Faulkener (for Herefordshire County Council) 2009.

⁸ Habitats Regulations Assessment of the Dwr Cymru Welsh Water Revised Draft Water Resources Management Plan. Entec, 2011.

described in **Table 1.2**, particular consideration was given to the possible pathways through which effects from activities associated with implementing policies in the Draft Herefordshire Core Strategy may be transmitted to features contributing to the integrity of a European site (e.g. via groundwater, air, river catchments etc.).

- 2.26 As described in Chapter 1, the findings of the HRA work that Herefordshire Council and LUC have already carried out in relation to earlier versions of the Herefordshire Core Strategy have been taken into consideration, along with the HRA Report for the Hereford Relief Road, and the outputs of the Water Steering Group.
- 2.27 Therefore, during the Screening of the Draft Herefordshire Core Strategy (March 2013), the following assumptions were applied in relation to assessing the likely significant effects on European sites that may result from development associated with implementing the policies in the Core Strategy.

Interpretation of 'likely significant effect'

- 2.28 The DTA paper prepared to inform this HRA of the Herefordshire Core Strategy (February 2013), sets out reference to recent relevant case law, which helps to interpret when effects should be considered as a likely significant effect, when carrying out HRA of a land use plan.
- 2.29 In the Waddenzee case⁹, the European Court of Justice ruled on the interpretation of Article 6(3) of the Habitats Directive (translated into Reg. 102 in the Habitats Regulations), including that:
- An effect should be considered 'likely', "if it cannot be excluded, on the basis of objective information, that it will have a significant effect on the site" (para 45).
 - An effect should be considered 'significant', "if it undermines the conservation objectives" (para 47).
 - A conclusion of 'no adverse effect on integrity': "... is the case where no reasonable scientific doubt remains as to the absence of such effects" (para 59).
- 2.30 Reference is also made in the DTA paper to a recent opinion delivered to the Court of Justice of the European Union¹⁰, which commented:
- "The requirement that an effect in question be 'significant' exists in order to lay down a de minimus threshold. Plans or projects that have no appreciable effect on the site are thereby excluded. If all plans or projects capable of having any effect whatsoever on the site were to be caught by Article 6(3), activities on or near the site would risk being impossible by reason of legislative overkill."*
- 2.31 This opinion (the 'Sweetman' case) therefore allows for the authorisation of plans and projects whose possible effects, alone or in combination, can be considered 'trivial' or *de minimus*; referring to such cases as those "which have no appreciable effect on the site". In practice such effects could be screened out as having no likely significant effect; they would be 'insignificant'.

Mitigation provided by policies within the Core Strategy

- 2.32 Mitigation of some of the identified potential effects could be achieved through implementation of policies which require good practice measures during construction (e.g. of transport infrastructure, housing or employment development) such as noise and light reduction, and more efficient use of water in new development. The provision and use of improved sustainable transport links to and from particular locations (e.g. major business/employment sites) would also help to reduce car traffic.
- 2.33 Certain policies within the Draft Core Strategy will help to implement these types of mitigation measures described above and therefore avoid significant effects on European sites. Such policies include MT1: Traffic Management, Highway Safety and Promoting Active Travel (which aims to increase the use of sustainable modes of transport), LD3: Biodiversity and Geodiversity (which specifically aims to conserve and enhance local biodiversity, including at European sites) and SD4: Wastewater Treatment and River Water Quality (which aims to ensure that development does not

⁹ ECJ Case C-127/02 "Waddenzee" Jan 2004..

¹⁰ Advocate General's Opinion to CJEU in Case C-258/11 Sweetman and others v An Bord Pleanala 22nd Nov 2012.

undermine the achievement of water quality targets for protected rivers within the county, in particular through the treatment of wastewater). In addition, specific references have also been made within some of the place-shaping policies where needed to ensure adverse effects on integrity of European sites will be avoided (e.g. policy RW2 relating to the strategic allocation at Ross-on-Wye and potential noise and vibration effects during construction and occupation of new homes).

- 2.34 Due to recommendations made in the previous HRA stages, additional mitigation measures have been included or strengthened within some of the Core Strategy policies. Therefore, the extent to which mitigation may be achieved through other policies within the Core Strategy was considered during the screening stage and has influenced the screening conclusions of the HRA (see **Appendix 1**).

Assumptions and information currently available relating to Physical Loss/Damage to Habitat

- 2.35 Any development resulting from the Core Strategy would be located in Herefordshire County; therefore only those European sites within Herefordshire boundary should be affected through physical loss of habitat (unless there is a known range for mobile species outside the boundary of the European site). **As such, this potential effect only needed to be considered in relation to the four sites within Herefordshire's boundary (Downton Gorge, River Clun, River Wye and Wye Valley Woodlands SACs), as well as the Wye Valley & Forest of Dean Bat Sites SAC due to the potential for off-site habitats used by the bat species outside of the SAC boundary to be affected.**
- 2.36 The overall Movement and Transportation Policy (SS4) and the Hereford Movement Policy (HD2) are the only policies that specifically direct development within the boundary of a European site, because the proposed Hereford Relief Road will have to cross the River Wye SAC. However, the separate HRA undertaken for the relief road corridor route options looked in more detail at the potential effects of physical damage or loss of habitat for the qualifying features of the River Wye SAC. It states that site clearance and construction activities could result in the loss or damage of otter holt or lying up sites. No evidence of otter holts was recorded in habitats in close proximity to the proposed river crossings during surveys undertaken in June and October 2010, but such sites may exist in areas of woodland away from the SAC. The Relief Road HRA report states that further surveys should be undertaken on any route corridor option taken forward, to confirm the presence or absence of holts and/or above-ground resting sites. The loss of above-ground resting sites, or holts used on an occasional basis, if present, is unlikely to have a significant adverse effect on local otter populations, as abundant suitable habitat is present along the River Wye. However, the loss of any natal holt sites may be more significant, should they be present and it may not be possible to avoid them through careful alignment of the road within the corridor. In this situation, it is likely that compensation for the loss of any important holt sites, in the form of replacement artificial holts, would be required. In addition, the Relief Road HRA stated that the use of widespan bridge structures would enable direct working within the watercourse to be avoided (and thus avoid likely significant effects on loss or damage to habitats for the fish and crayfish qualifying features of the River Wye SAC).
- 2.37 Despite this, the Relief Road HRA noted that at this stage in the relief road project it is difficult to conclusively demonstrate there will not be a likely significant effect on the River Wye SAC, because sufficient uncertainty remains regarding the specific route, design and construction methods that will be used. As the project progresses, it may be possible to confirm that there will be no significant effects on the River Wye SAC.
- 2.38 As a result of recommendations from the HRA team in a draft of this HRA report supplied to Herefordshire Council, the Council has made changes to policy HD2 prior to finalising the Draft Herefordshire Core Strategy (March 2013). Policy HD2 now requires the relief road to be developed in such a way which avoids and mitigates adverse impacts from physical damage/loss of habitat, noise pollution and vibration, light pollution, air pollution and water quality on the River Wye SAC. The supporting text also states that work on the detailed alignment of the road will be considered during the preparation of the Hereford Area Plan. Close working with key statutory bodies will be needed to avoid impact on natural assets and appropriate identification of mitigation measures particularly in relation to impacts from physical damage/loss of habitat, noise pollution and vibration, light pollution, air pollution and water quality on the River Wye.

- 2.39 Therefore, **sufficient mitigation requirements are now included in policy HD2 to ensure that there will not be likely significant effects as a result of physical loss or damage to habitats within the River Wye SAC. However, it is recommended that HRA screening for the Hereford Area Plan should revisit the screening conclusion regarding the potential for likely significant effects arising from physical loss or damage to habitats within the River Wye SAC, once more detail about the proposed route for the relief road is available, and to ensure any more detailed specific mitigation requirements for the relief road are included.**
- 2.40 None of the other policies which specify strategic locations for development (e.g. the place-shaping policies for Hereford, Leominster, Bromyard, Ledbury and Ross-on-Wye) are likely to have a significant effect due to physical damage or loss of habitat at any of the European sites within Herefordshire (+15km). A number of other policies are likely to result in housing or other forms of development (e.g. the rural areas/waste/minerals/employment policies); however, the location of much of this development will not be known until lower tier plans are prepared (i.e. other development plan documents by Herefordshire Council or neighbourhood development plans) or planning applications for development are submitted.
- 2.41 Policy LD3 Biodiversity seeks to protect sites of international importance (and has been strengthened based on earlier HRA recommendations in the 2010 HRA report), therefore it is considered **unlikely that significant effects would result in terms of physical damage or loss of habitat due to development proposals that come forward**, as they will need to be assessed against policy LD3.

Assumptions and information currently available relating to Noise, Vibration and Light Pollution

- 2.42 **Noise** pollution effects, e.g. during the construction of new housing or other development or as a result of increases in traffic along roads, are most likely to disturb birds and mammals species and are thus a key consideration with respect to European sites where these are among the qualifying features. A large proportion of the European sites within Herefordshire are not vulnerable to noise pollution or vibration as their qualifying features are plants, woodland etc. which are not vulnerable to these effects. **Therefore, only those European sites that include bat species among their qualifying features were considered likely to experience adverse effects due to noise (Wye Valley Woodlands SAC and the Wye Valley and Forest of Dean Bat Sites SAC).**
- 2.43 **Vibration** effects may also result where development takes place in close proximity to European sites which include bats, otters and fish species as qualifying features. It is assumed that for such disturbances to have a significant effect, the development taking place would need to be either within or immediately adjacent to the site. In the case of Herefordshire, development taking place as a result of the Core Strategy policies would therefore need to be located within the county boundary and close to the strategic locations allocated for housing and employment development (around Hereford and the market towns). Therefore, resulting vibration is not considered likely to significantly affect European sites located outside of the county boundary. **The only sites within Herefordshire which includes qualifying features likely to be affected by vibration are the River Wye SAC, Wye Valley Woodlands SAC and the Wye Valley and Forest of Dean Bat Sites SAC.** There is some uncertainty regarding the appropriate assumption to be applied with regards to the distance over which vibration effects are likely to be experienced, as it is not possible to determine in this strategic-level HRA the proximity of proposed development areas (which are not specifically defined in the Draft Core Strategy) to specific locations of qualifying fish species spawning sites, otter breeding sites etc. However, for the bat sites, a 10km buffer around the SAC boundary was used as described below.
- 2.44 Artificial **lighting** at night (e.g. street lamps, flood lighting and security lights) is most likely to affect bat populations, which are nocturnal. **Therefore, only those European sites that include bat species among their qualifying features were considered likely to experience adverse effects due to lighting (Wye Valley Woodlands SAC and the Wye Valley and Forest of Dean Bat Sites SAC).**

- 2.45 In line with the assumptions used in the HRA of the West Midlands RSS¹¹, and also reflecting studies cited in the Hereford Relief Road HRA¹², **a 10km buffer was used to establish the likely zone of influence of development and associated noise, vibration and light pollution on European sites in which bats are a qualifying feature**, as they may travel up to 10km to forage or roost. Within this identified zone, more detailed information about the locations of foraging/roosting sites and patterns of movement was used in order to come to a judgement about the likely significance of effects of Core Strategy policies on particular sites. In particular, the Herefordshire Bat Study¹³ provided useful data, for example mapping the locations of roosting sites. This data was supplemented by input from our own in-house ecologists in order to make a judgement about the likely significant effects of Core Strategy policies which may lead to development and other activities within the vicinity of bat sites, and about the potential mitigation measures that may reduce or remove the potential for such effects.
- 2.46 The Usk Bat Sites SAC is located more than 10km away from any of the development that has been spatially mapped, and is located approximately 15km from the Herefordshire county boundary, therefore development taking place within the county as a result of the Core Strategy proposals is not likely to have a significant effect on the qualifying features of the site. However, **the Wye Valley Woodlands SAC and the Wye Valley and Forest of Dean Bat Sites SAC are located within 10km of the proposed development at Ross-on-Wye, meaning that noise, vibration and light pollution effects on the bats** from the housing development proposed at Ross-on-Wye needed to be considered.
- 2.47 The findings of the Herefordshire Bat Study were that the strategic development site proposed at Ross-on-Wye is largely an unsuitable habitat for lesser and greater horseshoe bats and that nearby foraging areas will not be affected by new development on that site. Specific reference to the potential for impacts is not included in the study report. When particular locations come forward for development at the planning application stage, further information should become available to enable more certain conclusions about the likely impact of noise pollution and vibration on the bats, as this will depend largely on the scale and type of development and the potential to mitigate effects, e.g. through the implementation of good practice construction techniques during construction. **Therefore, significant effects on the Wye Valley Woodlands SAC and the Wye Valley and Forest of Dean Bat Sites SAC due to noise, vibration and light pollution on bat species associated with development at Ross-on-Wye are considered to be unlikely**, as development of the strategic site is unlikely to affect habitat used by the bats. In addition, as a result of the recommendation made in the 2010 HRA report, and an additional recommendation arising from this iteration of the HRA, there is a specific requirement within policy RW2 (Land at Hildersley) to avoid and mitigate adverse impacts from noise and light pollution and vibration (during both construction and occupation of new homes) on the River Wye SAC, Wye Valley Woodlands SAC and the Wye Valley & Forest of Dean Bat Sites.
- 2.48 In addition to the potential impacts of noise and vibration on bat species in the above SACs, while otters and some fish species (notably Allis and Twaite shad) which are qualifying features of the River Wye SAC may also be adversely affected from noise and vibration associated with development at Ross-on-Wye, Hereford and the Hereford Relief Road, it should be possible to avoid or mitigate adverse impacts on otters and shad, for example by timing works to avoid critical periods (e.g. spawning periods for shad or otter breeding periods), or preventing work from being undertaken at night to avoid disturbance to otters, and providing new otter holts. These sorts of measures can be more specifically defined at the planning application stage, once detailed proposals and site locations are provided, and required as conditions on planning permissions. As noted above, as a result of the recommendation made in the 2010 HRA report, there is a specific requirement within policy RW2 (Land at Hildersley) to avoid and mitigate adverse impacts from noise pollution and vibration (during both construction and occupation of new homes) on the River Wye SAC. As part of this current HRA, a similar criterion was recommended to be added to policy HD5 (Southern Urban Expansion – Lower Bullingham), which

¹¹ *Habitats Regulations Assessment of the Phase II Revision of the Regional Spatial Strategy for the West Midlands* Prepared for West Midlands Regional Planning Body by URSUS Consulting Ltd. and Treweek Environmental Consultants, October 2007.

¹² *Hereford Relief Road Habitats Regulations Assessment – Route Corridor Options Screening Report*. Hyder Consulting (UK) Limited, April 2011.

¹³ *Greater and Lesser Horseshoe Bats in South Herefordshire 2010: A Study to Inform Herefordshire Council's Local Development Framework*. Herefordshire Biological Records Centre, June 2010.

has been done by Herefordshire Council in the final version of the Draft Herefordshire Core Strategy (March 2013). **Therefore, significant effects on the River Wye SAC due to noise and vibration effects on otter or fish species associated with development at Hereford or Ross-on-Wye are considered to be unlikely.**

- 2.49 The screening conclusions of the **Relief Road** HRA with respect to the River Wye SAC were that the western route corridor options (which include the route proposed as part of policies SS4 and HD2) are considered **unlikely to result in significant effects from noise, vibration or light pollution on the River Wye SAC, providing appropriate implementation of the assumed mitigation measures** described in Section 4.2.5 of the report (e.g. works that involve percussive construction techniques, such as pile-driving, should be avoided in the vicinity of the river if possible, or undertaken outside the key migration periods and only during daylight hours. Light pollution effects may also be mitigated in a similar way to those relating to noise and vibration, e.g. the use of appropriate construction techniques, and avoiding working at night time).
- 2.50 The Relief Road HRA looked in more detail at the potential effects of light pollution for the qualifying features of the River Wye SAC. It notes that fish, otters, and other nocturnal species using the river, for example the white-clawed crayfish could be affected by nocturnal lighting of the River Wye during construction of the relief road (in particular the bridge that would need to span the river). It states that nocturnal lighting of the River Wye during construction will need to be avoided as far as possible. However, there may be a requirement, for example for health and safety reasons, to illuminate the bridge during construction. The use of directional lighting to minimise light-spill, and maintain dark corridors to allow continued movement of otters and fish species would be expected to minimise any adverse impacts. Any lighting incorporated into the bridge once it is operational will not illuminate the river channel. This will ensure that the fish, otters, and white-clawed crayfish using the river are not affected by lighting proposals. The Relief Road HRA concludes that the exact lighting proposals will need to be finalised during the detailed design of the bridge structure.
- 2.51 The Relief Road HRA also states that site clearance and construction activities would also have the potential to disturb otters in the vicinity of the works. The report notes however, that it is likely that otters would quickly become habituated to increased levels of noise and disturbance associated with new bridge crossings of the River Wye, based on evidence experienced by the authors of the HRA report in relation to several schemes where otters have been shown to move along river corridors during new bridge construction operations. Therefore, a likely significant effect on the River Wye SAC is not considered to occur with respect to noise and vibration effects on otters.
- 2.52 However, the Relief Road HRA notes that at this stage in the relief road project it is difficult to conclusively demonstrate these findings, and they can only be supported if in-combination effects with other policies and plans within the wider draft Core Strategy can be satisfactorily mitigated. Development of the preferred route corridor option would require further ecological surveys, air and water quality, and hydrological/hydrogeological surveys to be completed, and more detailed information on design and construction methodologies to be produced.
- 2.53 Based on the findings of the Relief Road HRA, during this iteration of the HRA for the Core Strategy the HRA team recommended that Herefordshire Council add specific mitigation requirements to policy HD2 and the supporting text to policy HD2 (Hereford Movement). The Council agreed to make those changes and Policy HD2 in the Draft Core Strategy (March 2013) now requires the relief road to be developed in such a way that it avoids and mitigates adverse impacts from physical damage/loss of habitat, noise pollution and vibration, light pollution, air pollution and water quality on the River Wye SAC. The supporting text also states that work on the detailed alignment of the road will be considered during the Hereford Area Plan. Close working with key statutory bodies will be needed to avoid impacts on natural assets and appropriate identification of mitigation measures particularly in relation to impacts from physical damage/loss of habitat, noise pollution and vibration, light pollution, air pollution and water quality on the River Wye SAC.
- 2.54 Therefore, **sufficient mitigation requirements are now included in policy HD2 to ensure that there will not be likely significant effects as a result of noise and light pollution or vibration effects from the relief road development on the qualifying species within the River Wye SAC. However, it is recommended that HRA screening for the Hereford Area**

Plan should revisit the screening conclusion regarding the potential for likely significant effects arising from noise and light pollution or vibration on the qualifying fish and otter species within the River Wye SAC, once more detail about the proposed route for the relief road is available, and to ensure any more detailed specific mitigation requirements for the relief road are included.

Assumptions and information currently available relating to Air Pollution

- 2.55 Air pollution is most likely to affect European sites where plant, soil and water habitats are the qualifying features, but some qualifying animal species may also be affected, either directly or indirectly, by any deterioration in habitat as a result of air pollution.
- 2.56 In terms of vehicle traffic, nitrogen oxides (NO_x, i.e. NO and NO₂) are considered to be the key pollutants. Deposition of nitrogen compounds may lead to both soil and freshwater acidification, and NO_x can cause eutrophication of soils and water. The EU Habitats Directive Handbook guidance allows a 1% threshold at which emissions are not considered likely to have a significant effect (either alone, or in combination, and irrespective of background levels). This is based on evidence that at distances greater than 55 metres from the kerbside, ground level concentrations of NO_x represent less than 1% of the critical level.
- 2.57 Based on the Highways Agency Design for Road and Bridges (DMRB) Manual Volume 11, Section 3, Part 1, it is assumed that air pollution from roads is more likely to be significant up to 200m from the road itself. Where increases in traffic volumes are forecast, this 200m buffer needs to be applied to the relevant roads in order to make a judgement about the likely geographical extent of air pollution impacts.
- 2.58 The DMRB Guidance for the assessment of local air quality provides criteria that should be applied at the Scoping Level stage of an assessment of a plan or project, to ascertain whether there are likely to be significant impacts associated with routes or corridors. Based on the difference between traffic with proposals (the Do-Something scenario) and without proposals (the Do-Minimum scenario), affected roads which should be assessed are those where:
- Daily traffic flows will change by 1,000 AADT (Annual Average Daily Traffic) or more; or
 - Heavy duty vehicle (HDV) flows will change by 200 AADT or more; or
 - Daily average speed will change by 10 km/hr or more; or
 - Peak hour speed will change by 20 km/hr or more.
- 2.59 In the absence of detailed traffic forecasts for the whole county, it was assumed that only those roads forming part of the primary road network (motorways and 'A' roads) would be likely to experience any significant increases in vehicle traffic as a result of development. As such, where a site is within 200m of only minor roads, no significant effect from traffic-related air pollution was considered to be the likely outcome.
- 2.60 Critical loads for nitrogen have been established for certain habitats dependent on low nitrogen levels, and are expressed in deposition units of kg N/ha/yr, and are reported in DMRB guidance and on the Air Pollution Information System (APIS)¹⁴ database. Data from APIS has been used to identify those European sites in and around Herefordshire where levels of particular pollutants are already exceeding critical loads, indicating that any increases could have adverse impacts.
- 2.61 Of the sites not screened out at earlier stages in the HRA, only Usk Bat Sites SAC and Wye Valley Woodlands SAC lie within 200m of an 'A' road (A465 between Merthyr Tydfil and Abergavenny for the Usk Bat Sites SAC, and the A40 between Monmouth and Ross-on-Wye and the A466 between Monmouth and Hereford for the Wye Valley Woodlands SAC). These sites are therefore likely to experience air pollution effects due to an increase in vehicle traffic resulting from the provision of new housing and a potential increase in travel between towns within and around the county. However, it is not possible to be sure whether vehicle traffic on these particular routes is likely to increase, as further information about traffic forecasts along the relevant 'A' roads is needed to determine whether there is likely to be a significant increase from current traffic levels due to the level of development planned in the county. While traffic modelling was undertaken as part of the

¹⁴ www.apis.ac.uk

evidence base for the Hereford Relief Road options, modelling of traffic levels along the wider network in Herefordshire is not yet available. This is something that Herefordshire Council has agreed to address between now and the Submission version of the Herefordshire Core Strategy.

- 2.62 According to the APIS website, both Usk Bat Sites SAC and Wye Valley Woodlands SAC contain qualifying habitats that are sensitive to deposition of nitrogen and exceeding critical loads, including broadleaved and coniferous woodland which is noted in APIS as the relevant broad habitat for the qualifying bat species. However, road transport emissions only contribute around 8% and 12.6% of the overall nitrogen deposition respectively for the Usk Bat Sites SAC and the Wye Valley Woodlands SAC. **Therefore, unless there is an increase in traffic above the levels listed above along the A465, A40 and A466, then significant effects as a result of air pollution on the Usk Bat Sites SAC and Wye Valley Woodlands SAC are considered unlikely.** This conclusion will need to be reviewed in the next iteration of the HRA work for the Pre-Submission version of the Herefordshire Core Strategy.
- 2.63 The HRA for the Hereford relief road found that emissions associated with construction machinery and vehicles using any of the proposed eastern or western route corridor options would lead to local increases in air pollution. It noted that the qualifying Ranunculion fluitantis and Callitriche-Batrachion vegetation communities within the river could be affected by increased silt deposition, diffuse and point source pollution, including both air and waterborne. It concluded that these localised increases in atmospheric pollution would not be expected to have significant impacts on the River Wye SAC. However, as detailed air quality assessments have not yet been undertaken for the final route of the relief road, these would be required to fully assess the impacts of air pollution on the River Wye SAC. Given the distance of the North Core and South Core route corridor options from the SAC, the Relief Road HRA considered it highly unlikely that emissions associated with construction and operation of these route corridor options would lead to any significant changes in air quality in the vicinity of the River Wye SAC.
- 2.64 As a result of recommendations from this iteration of the HRA, Herefordshire Council has added specific mitigation requirements to policy HD2 and the supporting text to policy HD2 (Hereford Movement). Policy HD2 now requires the relief road to be developed in such a way which avoids and mitigates adverse impacts from physical damage/loss of habitat, noise pollution and vibration, light pollution, air pollution and water quality on the River Wye SAC. The supporting text also states that work on the detailed alignment of the road will be considered during the Hereford Area Plan. Close working with key statutory bodies will be needed to avoid impact on natural assets and appropriate identification of mitigation measures particularly in relation to impacts from physical damage/loss of habitat, noise pollution and vibration, light pollution, air pollution and water quality on the River Wye SAC.
- 2.65 Therefore, **sufficient mitigation requirements are now included in policy HD2 to ensure that there will not be likely significant effects as a result of air pollution on the qualifying habitats or species within the River Wye SAC. However, it is recommended that HRA screening for the Hereford Area Plan should revisit the screening conclusion regarding the potential for likely significant effects arising from air pollution on the qualifying habitats and species within the River Wye SAC, once more detail about the proposed route for the relief road should be available, and to ensure any more detailed specific mitigation requirements for the relief road are included.**
- 2.66 In addition to vehicle traffic, air pollution may also be caused by particular types of development such as waste management facilities (where they incorporate thermal treatment) or agricultural activities. Some types of waste facilities release gaseous emissions from waste management technologies involving, anaerobic digestion or producing energy from waste. Agriculture can impact air quality through the spreading of slurries and manures, and housed livestock. The main emissions from agriculture that are of concern include ammonia:
- Ammonia; high ammonia levels can cause localised nutrient enrichment, harming native plant species that require nutrient-poor conditions. About two-thirds of the nitrogen deposition that leads to over-enrichment and acidification of sensitive soils, habitats, and fresh waters comes from agricultural ammonia.
 - Methane; agricultural methane results from the digestive processes of livestock, with the remainder coming from animal waste.

- Nitrous oxide; agricultural nitrous oxide emissions arise from the use of inorganic nitrogen fertilisers and the storage of manures.

2.67 Air pollution effects may also arise from sources other than road traffic, for example waste management facilities that incorporate thermal treatment, or certain types of agricultural activities. Where such development may result from the Core Strategy (employment policy SS5 and waste policies W2 and W4), there may be an adverse effect on nearby European sites; however it is not possible to fully assess the likelihood of this occurring at this stage due to a lack of information about the precise location, type and scale of development, which will not be known until either the preparation of a Natural Resources Development Plan Document or at the planning application stage. However, most waste management facilities and large scale pig or poultry farms will also need to meet the high standards of design and operation that are required to obtain an Environmental Permit (EP), as regulated by the Environment Agency. The requirement to meet EP standards (including emissions to air, land and water, energy efficiency, noise, vibration and heat and accident prevention) should ensure that the design and operation of waste and agricultural facilities minimises air pollution. **Therefore, significant effects from air pollution on the European sites within Herefordshire are considered unlikely to occur as a result of waste or agricultural development.**

Assumptions and information currently available relating to Recreation and 'Urban' Impacts

- 2.68 Where a European site is small in size, located some distance from the main population centres and is not known to be under particular pressure from recreation activities or to be an especially popular place for amenity use, it was assumed that increases in population of the scale likely to result from the Herefordshire Core Strategy policies are unlikely to place sufficient additional pressure on the site through demand for recreation space that the site's integrity would be threatened. Conversely, effects were considered more likely where it is known that a site is already under pressure from recreation activities, or where it is large in size and is easily accessible from the main population centres in Herefordshire. Because the housing proposed under the rural areas policy (RA1) could potentially be located in any part of the county, it was considered possible that usage of any of the European sites for recreation may increase. In addition, 'urban' pressures such as deliberately started fires can be associated with an increase in human presence around European sites.
- 2.69 Detailed information about the use of the European sites in and around Herefordshire for recreation and amenity purposes was not available during the assessment. However, **only two of the European sites were identified as already being vulnerable to existing recreation and urban pressures** (in the JNCC data forms for each site), as follows. The River Wye SAC is known to be popular location for a wide range of recreation activities which may increase as a result of a growing nearby population. In addition, fishing activities had been implicated with the decline of salmon, however, the JNCC data form (dated July 2011) notes that initiatives such as the Wye Salmon Action Plan will help to address this issue. At the River Clun SAC, trout fishing is a threat, and the freshwater pearl mussel for which the site is designated relies on the presence of trout for part of its breeding cycle. None of the other European sites in and around Herefordshire were identified as vulnerable to recreation or urban pressures.
- 2.70 Therefore, the potential for adverse impact on the River Wye and River Clun SAC sites as a result of increased pressure for recreation space (e.g. as a result of the overall increased housing development planned at Hereford, the market towns and rural areas) was considered. However, the policies included in the Core Strategy in relation to provision and protection of Open Space, Sport and Recreation (OS1-3), Tourism (E4) and Biodiversity (LD3) are considered sufficient to mitigate any adverse impacts on these sites in relation to increased pressure for recreation space due to either their safeguards in terms of ensuring no detrimental effects on environmental assets, or their aim to provide open spaces and recreation areas which will help to reduce pressure on the Rivers Wye and Clun. Therefore, **significant effects on River Wye and River Clun SACs are considered unlikely due to recreation pressure and activities associated with increased housing development across the county.**

Assumptions and information currently available relating to Interruptions to Hydrological Regimes (Changes in Water Quantity)

- 2.71 European sites can be sensitive to changes in water quantity where they are designated for their water habitats, but also other habitats dependent on consistent water levels (e.g. bogs, mires, woodlands etc.). Of the European sites not screened out at earlier stages in the HRA, the following are sensitive to changes in water level/water table: River Wye SAC, River Clun SAC, Rhos Goch SAC, Llangorse Lake SAC and the River Usk SAC.
- 2.72 The water supply in Herefordshire comes mainly from Dwr Cymru Welsh Water (DCWW). DCWW's website states that following publication of their draft Water Resources Management Plan in 2009, new information was received arising from the Environment Agency Wales's Review of Consents process. The information included proposals from Environment Agency Wales, to modify DCWW's abstraction licences in order to comply with the Habitats Regulations 2010. As a result of this information a revised draft Water Resources Management Plan was published in October 2011, taking into account these proposed changes (and accompanied by its own HRA Report¹⁵). Following consultation the WRMP was amended to include the additional supporting evidence that DCWW had committed to provide in the Final WRMP¹⁶.
- 2.73 As DCWW is a member of Herefordshire Council's Water Steering Group, the progress of the WRMP and the Review of Consents was discussed directly with the Environment Agency and Herefordshire Council. From the minutes of the Water Steering Group meetings (available on the Council's website) and a summary Water Resources Report by the Water Steering Group (dated 3 February 2012, and also available on the Council's website) it is understood that DCWW confirmed that there are sufficient water resources to meet the increases in demand from Herefordshire throughout their operating area. It is also stated in the WRMP that there are sufficient water resources to meet demand during the plan period. The HRA for the WRMP also incorporates the sustainability reductions of the Review of Consents. Accordingly the HRA concludes no likely significant effects on any water resource sensitive European site. Furthermore the WRMP is subject to regular review to account for any changes experienced during the plan period. Herefordshire Council has agreed in the Water Resources Report to liaise with DCWW on this matter to ensure that there are no detrimental impacts on growth within Herefordshire. Should such an impact arise, Herefordshire Council will report this through the Annual Monitoring Report process and thus initiate a review of policy in the Core Strategy. **Therefore, no likely significant effects on European sites as a result of changes in water quantity are expected in relation to the Herefordshire Core Strategy.**

Assumptions and information currently available relating to Water Pollution

- 2.74 With regards to water quality, the Environment Agency confirmed the location of sewage treatment works servicing Herefordshire. Further information about waste water treatment was obtained from the Herefordshire Water Cycle Study¹⁷ initially, and subsequently the information arising from the Water Steering Group's meetings during 2011-13. Several of the European sites within Herefordshire are considered vulnerable to the increased water pollution that could result from a greater volume of sewage effluent being discharged into rivers as a result of new housing development. The different river catchments within Herefordshire are shown in the map below policy SD4 in the Draft Core Strategy.
- 2.75 The River Usk SAC receives discharge from sewage treatment works (STWs) serving settlements outside of the administrative boundary of the plan. Similarly, the River Clun SAC, only has only around 1km of the river in Herefordshire, with no STWs serving Herefordshire discharging to it. Therefore, **the policies included in the Core Strategy will not affect the River Usk SAC or the River Clun SAC.**
- 2.76 Settlements within Herefordshire's boundary are served by either DCWW or Severn Trent Water companies. The Severn Trent area covers an area in the north of the County (catchment of the River Teme) and the eastern part of the County, which is in the catchment of the River Leadon. None of Severn Trent STWs discharge into the River Wye catchment. The Severn Trent area is

¹⁵ *Habitats Regulations Assessment of the Dwr Cymru Welsh Water Revised Draft Water Resources Management Plan*. Entec, 2011.

¹⁶ *Dŵr Cymru Welsh Water Final Water Resources Management Plan*. Dŵr Cymru Welsh Water, September 2012.

¹⁷ Herefordshire Outline Water Cycle Study (2009) Brian Faulkener (for Herefordshire County Council)

the minority of the County (compared to the are covered by DCWW) but it does include a number of the larger rural settlements, including Colwall the largest of the county’s villages, Cradley, Leintwardine, Wigmore, Orleton and Brimfield, and the market town of Ledbury. The sewage treatment works serving Ledbury discharges into the River Leadon which is not a designated European site within Herefordshire (+15km), so the development proposed there is not considered likely to result in a significant effect on water quality within the plan area, either alone or in combination with other proposals.

- 2.77 Apart from the STWs serving Ledbury and some of the rural villages in the north and east of the county, most of the sewage treatment works that serve the settlements within Herefordshire are operated by DCWW and discharge into the River Wye, either directly or via tributaries such as the River Lugg, River Frome, River Monnow and the River Arrow. The River Lugg catchment already suffers from pollution pressures from phosphates entering the river from STW discharges and agricultural diffuse pollution. Diffuse pollution also arises from urban areas. The evidence map in the Water Cycle Study appendices (Map 7-5) shows that most of the River Wye catchment is in moderate ecological status, while the upper reaches of the River Lugg (which is a tributary of the River Wye) from Presteigne to Leominster are in poor ecological status.
- 2.78 The River Wye SAC is already experiencing impacts on water quality as a result of changing land use within the catchment, and from point-source discharges, therefore any increase in demand for water treatment in the vicinity of the site could exacerbate this problem. Herefordshire Council and DCWW reviewed existing capacity and ‘headroom’¹⁸ available within the ‘Dry Weather Flow’¹⁹ permits for the STWs serving Hereford, the Market Towns and more rural areas, and compared this (through a series of calculations) with the amount of new development proposed in the Herefordshire Core Strategy for each town plus the rural areas. A summary of this review is provided in **Table 2.3**, and shows that **there is sufficient existing permitted headroom in the STWs serving Hereford, Bromyard, Kington, and Ross-on-Wye to continue to treat water from the amount of new housing provided for in the Core Strategy throughout the plan period, although under the current water quality levels in the River Wye SAC this does not mean that there would not be a likely significant effect if all the available headroom were used.** However, as described in the DTA paper, the work undertaken by the Herefordshire Water Steering Group since it was established in 2011 and up until very recently when Natural England and the Environment Agency signed the Statement of Intent (19 February 2013), including the intention to **prepare the Nutrient Management Plan (NMP) for the River Wye SAC should ensure that development within Herefordshire which can be accommodated within existing water discharge permits would not be likely to have a significant effect upon the River Wye SAC.** The Statement of Intent explains that “*the NMP will embody measures which will ensure the favourable conservation status of the SAC in respect of phosphate levels as soon as possible and at the latest by 2027 taking in to account the existing river phosphate levels and existing water discharge permits*”.

Table 2.3: Summary of approximate number of new housing that can be delivered within headroom of existing Dry Weather Flow Permits for DCWW STWs serving Herefordshire towns and rural areas

STW name and town/area served (in brackets)	Approximate number of new housing that can be delivered within headroom of existing Dry Water Flow Permit	Number of new housing units proposed in Core Strategy
HEREFORD EIGN (Hereford)	7,595	6,500
ROTHERWAS (Hereford)	11,525	

¹⁸ Note that the Joint Environment Agency and Natural England guidance published in July 2011, “Advising on Growth and Water quality in Natura 2000 sites and SSSIs”, defines ‘headroom’ as relating to the unused components of a permit that allow for variation in the efficacy of treatment to provide scope for additional capacity at a STW. Headroom in a permit can be generated through a difference between current and permitted effluent **quality**, or a difference between current and permitted effluent **flow rate**.

¹⁹ The same EA/NE guidance explains that the ‘Dry Weather Flow’ (DWF) of an effluent is the flow specified in permit conditions. This flow, together with the required water quality target and dilution rates in the river is used to calculate permit conditions for effluent quality.

STW name and town/area served (in brackets)	Approximate number of new housing that can be delivered within headroom of existing Dry Water Flow Permit	Number of new housing units proposed in Core Strategy
BROMYARD (Bromyard)	526	500
KINGTON (Kington)	597	200
LOWER CLEEVE (Ross-on-Wye)	1,403	900
LEOMINSTER WORCESTER ROAD (Leominster)	922	2,300
Various STWs (rural parts of Herefordshire)	2,513	5,300
Total	25,081	

- 2.79 Conversely, **there is not sufficient existing permitted headroom in the STWs serving Leominster and parts of rural Herefordshire to continue to treat water from all of the new housing provided for in the Core Strategy without affecting water quality in the River Wye SAC.** In terms of the rural areas, development in villages near Leominster and just north of Hereford are more likely to have an impact due to the sensitivity of the River Lugg and the lack of permitted headroom in the STWs, but specific locations for development in the villages and outside villages will not be determined until either lower tier plans are produced, or planning applications come forward. However, some of the villages and rural areas where the additional 5,300 homes will be developed will be served by Severn Trent Water STWs, so the shortfall in the existing headroom at DCWW STWs may not be as great as shown in Table 2.3. In addition, the flow data used by DCWW for the review summarised in Table 2.3 above needs to be updated with 2012 flow data, which will be available after March 2013.
- 2.80 In relation to development beyond existing permits (i.e. within the place-shaping policies for Leominster and the rural areas, where the STWs do not have sufficient permitted headroom available to meet all of the development proposed in the Core Strategy throughout the plan period), the Statement of Intent states that the NMP "*will also seek to identify actions*" that would enable such development to proceed. However, because the commitment by the relevant agencies in the Statement of Intent is more cautious than that given in relation to development within existing water discharge permits, it is considered that **development proposed at or around Leominster, and some of the rural areas, would have a likely significant effect upon the River Wye SAC**, in which case an appropriate assessment would be required as part of the HRA of the Core Strategy (see **Chapter 4**).
- 2.81 Due to the rural nature of Herefordshire a number of settlements are not on mains drainage and accordingly non-mains drainage is the only option for treatment of wastewater. Non-mains drainage is not factored into the shortfall calculations for existing permitted headroom in WWTWs. Non-mains drainage also discharges to the River Wye and its tributaries, therefore it also contributes to increasing phosphate levels. For this reason, previously NE had objected to a number of planning applications for non-mains drainage. However, through the positive partnership working of all members of the Water Steering Group, Herefordshire Council has agreed with Natural England to a set of distance and volume threshold criteria with regard to non-mains drainage to allow development within the Wye SAC catchment to proceed where the development is of such a small-scale and situated such a distance from the SAC that there would be no impact.
- 2.82 In addition to the potential for changes in water quality resulting from increased pressure on sewage treatment works, there is **potential for construction of the Hereford Relief Road to increase sediment levels within the River Wye SAC** at the point at which it needs to cross the River Wye. Any reductions in water quality as a result of pollutants or silt entering the river during construction or operation of the relief road could negatively affect the white-clawed crayfish and qualifying fish species, by interfering with feeding ability (for crayfish) fish migrations, reducing breeding success, or contributing to mortality of the species. In addition, if reductions in fish densities in the river occur due to increased siltation, this could reduce the availability of prey species for otters, which are also a qualifying feature of the River Wye SAC.

Significant reductions in fish densities as a result of the scheme construction would only be expected to occur in the event of a serious pollution event during construction or operation of the scheme.

- 2.83 However, while the exact route is not yet determined, nor the crossing point on the River Wye, the HRA for the Relief Road concluded that it would be possible to deliver an effective pollution prevention strategy following Environment Agency guidelines, particularly during construction of the scheme, and develop a suitable drainage design, which would avoid likely significant effects on water quality in the River Wye SAC. However, the Relief Road HRA considered that a successful pollution prevention strategy would be easier to achieve for the western route options than the eastern route options (due to the number of river crossings and length of river that would be affected if an eastern route was selected). Due to the changes made to policy HD2 and its supporting text in the final version of the Draft Core Strategy (March 2013), it is considered that **sufficient mitigation requirements are now included in policy HD2 to ensure that there will not be likely significant effects as a result of water pollution from construction of the Relief Road on the qualifying habitats or species within the River Wye SAC.**

3 Stage 1: Screening conclusions for the Draft Herefordshire Core Strategy

- 3.1 This chapter summarises the conclusions of the HRA screening exercise for the Draft Herefordshire Core Strategy (March 2013), while the full screening matrix used for the assessment can be seen in **Appendix 1**.

Significant effects likely

- 3.2 Based on the information currently available, and the assumptions described in **Chapter 2, the following Draft Core Strategy policies were concluded to be likely to have a significant effect on the River Wye SAC.**
- 3.3 **Policies LO1: Development at Leominster and LO2: Leominster urban extension** make provision for a minimum of 2,300 new homes to be developed throughout the plan period (2006-2031) of which approximately 1,500 dwellings will be provided in a single strategic urban extension to the south-west of the town. As described in Chapter 2, there is insufficient existing permitted headroom available at the STWs serving Leominster, which are generally located some distance upstream of the SAC boundary, to meet the planned level of growth in Leominster throughout the plan period. Therefore, **development proposed at Leominster would have a likely significant effect upon the River Wye SAC with respect to impacts on water quality.**
- 3.4 **Policies RA1: Rural Housing Strategy, RA2: Herefordshire's Villages and RA6: Rural economy** make provision for 5,300 new homes to be developed throughout the plan period (2006- 2031). As described in Chapter 2, there is insufficient existing permitted headroom available at a number of the STWs serving rural parts of Herefordshire, which are generally located some distance upstream of the SAC boundary, to meet the planned level of growth in the rural areas throughout the plan period. Therefore, **some of the development proposed under policies RA1, RA2 and RA6 would have a likely significant effect upon the River Wye SAC with respect to impacts on water quality.**
- 3.5 For these policies, Stage 2 of the HRA: Appropriate Assessment needed to be undertaken, and this is described in **Chapter 4** of this report.

Significant effects unlikely

- 3.6 All of the remaining Draft Core Strategy policies were found to be unlikely to result in significant effects on European sites within Herefordshire. In many cases this was because the policy would not itself result in development, i.e. it related instead to criteria for development which is proposed under other policies/plans (e.g. many of the General policies and some of the Spatial Strategy policies). In a number of cases, Draft Core Strategy policies also include measures to protect the natural environment, including biodiversity, and therefore a conclusion of no significant effect was reached for this reason. In addition, these policies have the potential to mitigate some of the possible adverse effects arising from other policies.
- 3.7 For those policies which would result in development (e.g. the place-shaping policies) and that could have impacts on one or more of the European sites within Herefordshire (+15km), based on the assumptions and information currently available summarised in Chapter 2, it was determined that these impacts would not have an appreciable effect on the site in question, i.e. that they were not likely to be significant.

- 3.8 Nevertheless, due to some ongoing updates to the information used to inform this HRA, there will be a need to review some of the screening assumptions conclusions at the next iteration of the HRA to accompany the Pre-Submission version of the Herefordshire Core Strategy. In particular, it will be necessary to review whether:
- There is forecast to be an increase in traffic (associated with the growth levels proposed in the Core Strategy) above the threshold levels listed in Chapter 2 (paragraph 2.62) along the A465, A40 and A466, to determine whether significant effects as a result of air pollution on the Usk Bat Sites SAC and Wye Valley Woodlands SAC are likely.
 - There is any change in the number of new houses that could be served within the existing permitted headroom at the STWs serving Hereford, the market towns and rural areas once DCWW has updated the analysis based on 2012 flow data (see paragraph 2.79).

Potential in-combination effects

- 3.9 As already described, Regulation 102 of the Habitats Regulations 2010 requires an Appropriate Assessment of 'a plan or project which is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects)'. **Appendix 3** presents the review of neighbouring plans which were considered most likely to have in-combination effects with the Herefordshire Core Strategy.

- 3.10 The following potential impacts on European sites around Herefordshire were identified from plans and strategies in neighbouring authorities:

- The HRA for the Adopted Forest of Dean Core Strategy concluded that the Core Strategy will not result in any significant negative impacts on identified sites, although there will be a need for HRA Screening, with the possibility of an Appropriate Assessment requirements, at later stages of the planning processes, when development proposals are more detailed. The HRA considered the potential for in-combination effects to arise from the Forest of Dean Core Strategy along with other plans and strategies, and **no potential in-combination effects with the Herefordshire Core Strategy were identified.**
- The HRA for the Proposed Submission version of the South Worcestershire Development Plan identified at the screening stage that there was uncertainty with regard to the potential for significant effects on **Bredon Hill SAC** and **Lyppard Grange SAC** as a result of increased disturbance, in particular from **increased recreational activity**; however these potential impacts were able to be ruled out during the AA stage and it was concluded that the SWDP will not have adverse effects on the integrity of the SAC either alone or in combination with other plans through increased disturbance. The screening assessment also identified uncertainty with regard to the potential for significant in-combination effects with a number of plans including the Herefordshire Core Strategy on five European sites (including **Lyppard Grange SAC, Downton Gorge SAC, River Wye SAC, Severn Estuary SAC/SPA/Ramsar site and Walmore Common SPA/Ramsar site**) as a result of **changes to water levels and water quality**. These effects were again considered in more detail at the AA stage and it was concluded that the mitigation provided by Pre-Submission policies and current regulatory processes (EA Review of Consents), **the SWDP will not have adverse in combination effects on the integrity of the identified European sites through reduced water levels or water quality.**
- The HRA for the Adopted Shropshire Core Strategy found that the Core Strategy was not likely to have a significant effect on any of the European sites in the county, provided that adequate HRA work is carried out in relation to the Site Allocations and Management of Development DPD which determines the precise locations for development. The HRA Report for the Site Allocations and Management of Development Plan concluded that **there would be no likely significant effects on any European Sites** either alone or in-combination with other plans, provided that HRA decisions for 10 of the draft policies are passed down to the next tier of the plan-making process or in some cases to planning application stage.
- The HRA Report for the Monmouthshire Draft Deposit LDP concluded that the Deposit LDP (incorporating Focussed Changes, and including site allocations) would not have any likely

significant effects alone on European sites, if the recommended policy safeguards are incorporated into the Plan. These changes have since been incorporated through the Focussed Changes to the LDP and the SA and HRA Changes Log therefore reached a final conclusion of no likely significant effects on European sites from the LDP alone. However, the screening work identified four main areas of impact arising that **may have the potential for significant in combination effects** on the integrity of the identified European sites: **water resources, water quality, disturbance (including habitat loss and fragmentation) and air quality**. These issues were taken forward into the AA and considered in further detail. The AA assessed that there is uncertainty with regard to the potential adverse impacts of the LDP acting in combination with surrounding plans and projects. To address this uncertainty the AA proposed a number of mitigation measures, including recommendations to strengthen the mitigation provided by certain LDP policies. **The AA then concluded that the LDP will not have adverse effects on the integrity of European sites either alone or in-combination as the recommended mitigation measures have been incorporated into the Plan.**

- The HRA Report for the Powys LDP (Preferred Strategy) highlighted the potential for the LDP to adversely affect the integrity of 28 European Sites, either alone or in-combination with other plans or projects. However, due to the early stage of the Plan, these effects were uncertain in all cases. The screening process also highlighted the **potential for in-combination effects with other plans, including from Herefordshire's Core Strategy in relation to pollution** from adjacent road drains/houses/chemicals, development (engineering/contamination) **and recreation and leisure. In order to ensure that Powys' LDP does not have a significant negative effect, detailed policies need to be developed to mitigate the 'in-combination' effect of development on the identified sites.** The deposit proposals will be assessed and if necessary AA will be undertaken to inform the deposit plan.

3.11 Therefore, it can be concluded that significant effects between the Herefordshire Core Strategy in combination with other surrounding land use plans are not expected in most cases. However, any further HRA work undertaken in relation to the Powys LDP will need to be reviewed at the next iteration of the HRA for the Herefordshire Core Strategy in order to confidently conclude that the plan will not result in adverse in-combination effects in relation to pollution and recreation and leisure.

4 Stage 2: Appropriate Assessment

- 4.1 Following the screening stage, the plan-making authority is required under Regulation 102(1) of the Habitats Regulations 2010, to make an 'Appropriate Assessment' of the implications of any likely significant effects identified from the plan for European sites, in view of their conservation objectives. EC Guidance²⁰ states that the Appropriate Assessment stage of the HRA should consider the impacts of the plan (either alone or in combination with other projects or plans) on the integrity of European sites with respect to their conservation objectives and to their structure and function. A site's integrity depends on it being able to sustain its 'qualifying features' (i.e. those Annex I habitats, Annex II species, and Annex I bird populations for which it has been designated) and to ensure their continued viability. A high degree of integrity is considered to exist where the potential to meet a site's conservation objectives is realised and where the site is capable of self-repair and renewal with a minimum of external management support. The Appropriate Assessment therefore needs to focus on those impacts judged likely to have an effect on the qualifying features of European sites, or where insufficient certainty regarding this remained at the screening stage.
- 4.2 An Appropriate Assessment has therefore been undertaken for the River Wye SAC where likely significant effects with respect to changes in water quality from five of the Draft Herefordshire Core Strategy policies were unable to be ruled out during the screening stage (the screening findings were summarised in **Chapter 3** and can be seen in full in **Appendix 1**).

Appropriate Assessment methodology

Assessing the effects on site integrity

- 4.3 The Appropriate Assessment focuses on those impacts that are judged likely to have a significant effect on the qualifying features of a European site, or where insufficient certainty regarding this remained at the screening stage. As discussed in **Chapter 1**, a conclusion needs to be reached as to whether or not a policy and/or the plan would adversely affect the integrity of a European site. In order to reach such a conclusion, consideration was given to whether the predicted impacts of the Draft Core Strategy policies (either alone or in combination) have the potential to:
- Delay the achievement of conservation objectives for the site.
 - Interrupt progress towards the achievement of conservation objectives for the site.
 - Disrupt factors that help to maintain the favourable conditions of the site.
 - Interfere with the balance, distribution and density of key species that are the indicators of the favourable condition of the site.
- 4.4 The conservation objectives for River Wye SAC²¹ are to:
- "Avoid the deterioration of the qualifying natural habitats and the habitats of qualifying species, and the significant disturbance of those qualifying species, ensuring the integrity of the site is maintained and the site makes a full contribution to achieving Favourable Conservation Status of each of the qualifying features.*
- Subject to natural change, to maintain or restore:*
- *The extent and distribution of qualifying natural habitats and habitats of qualifying species;*

²⁰ Assessment of plans and projects significantly affecting European sites. Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC. European Commission Environment DG, November 2001.

²¹ http://www.naturalengland.org.uk/Images/UK0012642-River-Wye-Afon-Gwy-SAC_tcm6-32033.pdf

- *The structure and function (including typical species) of qualifying natural habitats and habitats of qualifying species;*
- *The supporting processes on which qualifying natural habitats and habitats of qualifying species rely;*
- *The populations of qualifying species;*
- *The distribution of qualifying species within the site”*

4.5 The potential impacts were set out and judgements made, based on the information available, as to whether the impact was likely to affect the integrity of the site, and if mitigation measures may be implemented to reduce the likelihood or severity of the impact.

Appropriate Assessment findings

4.6 In order to make a judgement about the likelihood of policies in the Draft Core Strategy having an adverse effect on the integrity of the River Wye SAC, the significant effects identified in relation to policies LO1, LO2, RA1, RA2 and RA6 have been considered below, in view of the qualifying features of the SAC and their conservation objectives listed above.

Water Quality effects on the River Wye SAC

4.7 The River Wye SAC currently includes sections where the water quality exceeds phosphate level targets defined in Natural England’s favourable condition tables. As a consequence, Natural England’s view is that this exceedance prevents sections of the river from meeting the SAC conservation objectives. The River Wye SAC was subject to a review of consents (RoC) by the Environment Agency in 2010.

4.8 As set out in the Statement of Intent signed by the Environment Agency and Natural England (February 2013):

“The current and likely future condition of the water quality of the river in respect to phosphate, without interventions identified within a nutrient Management plan, as assessed against its conservation objectives, is as follows:

- *The River Lugg section of the SAC is currently exceeding the phosphate target prescribed in the site’s favourable condition tables and is considered by Natural England to be failing its conservation objectives, and not therefore making a full contribution towards achieving favourable conservation status of each of the qualifying features of the SAC.*
- *A further section in the SAC (part of the River Wye, between Hay and the Lugg confluence) is currently meeting the phosphate target and is meeting conservation objectives. However, it is likely that wastewater discharge from future planned development (falling within the affirmed existing discharge consents (under RoC)) would eventually result in failure of the phosphate target and to the stretch failing its conservation objectives and not therefore continuing to make a full contribution towards achieving favourable conservation status of each of the qualifying features.*
- *The final section of the SAC, in the upper parts of the Wye, is meeting its conservation objectives and is considered not to be at risk from the current consented discharges.”*
[Emphasis added.]

4.9 In relation to the **likely significant effects on water quality in the River Wye SAC identified from water treatment requirements associated with development of housing within the place-shaping policies at Leominster (LO1 and LO2) and some of the rural areas in Herefordshire (RA1, RA2 and RA6)** going beyond existing permits for wastewater treatment works, the Statement of Intent prepared and signed by Natural England and the Environment Agency states that the Nutrient Management Plan (NMP) for the River Wye SAC will seek to identify actions that would enable such development to proceed.

4.10 The DTA paper to inform the HRA of the Herefordshire Core Strategy, very helpfully summarises the key outcomes and conclusions of the Herefordshire Water Steering Group with respect to this

issue, and with reference to relevant recent case law relating to interpretation of the requirements of the Habitats Regulations Assessment process.

- 4.11 It states that an appropriate assessment of the effects of increasing the dry weather flow limits at existing wastewater treatment works to accommodate further development “beyond existing permits” would need to take account of the potential effects of such permit amendments in light of the prevailing environment conditions at the time of the proposed permit changes (bearing in mind that there is some existing permitted headroom within the STWs, so some of the planned development within Leominster and the rural areas will be able to go ahead, but in later years in the plan period there will be a shortfall in permitted headroom available). The implementation of the NMP up to 2027 will result in an improving trend in phosphate levels within the SAC; the timing, location and extent of such anticipated “improvements” will only become apparent once the NMP is implemented.
- 4.12 The DTA paper therefore notes the difficulty at the current time, for the HRA of the Core Strategy to undertake an appropriate assessment of the potential effects on water quality in the River Wye SAC from the necessary permit changes (for those STWs serving Leominster and some of the rural areas), which takes account of the beneficial effects of the NMP in a meaningful manner. That is, it cannot be known at this time, what the phosphate levels in the River Wye will be in later parts of the plan period following successful implementation of the measures in the NMP.
- 4.13 With reference to relevant case law, the DTA paper states that whilst there can never be an absolute guarantee about what will happen in the future, in developing a Core Strategy, and because the effects are reasonably foreseeable, Herefordshire Council needs to have some degree of confidence that the avoidance of adverse effects on the integrity of the SAC, from allocated development “beyond existing permits”, can be the subject of a legally enforceable framework which would prevent such risks from materialising. However, it is not sufficient to simply rely on a later appropriate assessment at project stage to avoid adverse effects upon the integrity of the SAC; some consideration of how such effects might realistically be avoided at the plan stage is necessary.
- 4.14 It therefore goes on to suggest four scenarios, taking account of the forthcoming NMP, that might apply to future required permit amendments to deliver development beyond existing permits at Leominster and some of the rural areas:
- **Scenario A: Insignificant capacity** – Further capacity which is considered to represent so small a contribution to the SAC that it could not compromise the conservation objectives (even when considered in combination with other plans and projects). This would generally be expected to apply to further capacity being delivered at WWTWs which are a considerable distance upstream of the SAC boundary, or to very minor increases in capacity at works closer to the SAC boundary. Such capacity will not have any appreciable effect and could be regarded as trivial in light of the recent Sweetman case already referred to in Chapter 2, and as defined in a Natural England paper on triviality²² which is referred to in a Joint Environment Agency and Natural England 2011 paper²³. It is DTA’s opinion that such capacity could reasonably be assigned to new development without having an adverse effect upon the integrity of the River Wye SAC.
 - **Scenario B: Non-exceeded capacity** – Further capacity which can be assigned without causing an exceedence of the relevant Natural England phosphate targets within the SAC. It is DTA’s opinion that this capacity could reasonably be assigned to new development without having an adverse effect upon the integrity of the SAC, as it would not lead to an exceedence of the phosphate target and would not therefore undermine the conservation objectives.
 - **Scenario C: Temporary effect capacity** – Further capacity which is considered to represent a strictly temporary increase in phosphate load within the SAC, where the phosphate levels in the receiving stretch already exceed the relevant phosphate target. In the absence of a NMP the duration, severity and spatial extent of such permanent effects would generally be expected to prevent a conclusion of no adverse effect on the integrity of the SAC, especially when considered in-combination with other plans and projects. However, when the effects of

²² *Review of Consents Stage 3 conclusions, the in-combination test and triviality*. Helen Wake, Natural England, 2004.

²³ *Advising on Growth and Water Quality in Natura 2000 sites and SSSIs: A Joint Environment Agency / Natural England approach*. Environment Agency and Natural England, July 2011.

planned development are considered in combination with the NMP, the potential effects can be regarded as temporary. The duration, severity and spatial extent of the temporary increase would be such that it would not undermine the deliverability of the NMP and would not therefore be expected to undermine the conservation objectives of the SAC. It is DTA's opinion that such development may reasonably be delivered without adverse effects upon the integrity of the SAC. DTA also considers it reasonably foreseeable, with reference to the underlying principles set out in the DTA paper, that such temporary effects associated with additional capacity beyond existing permits might be offset by measures to be delivered through the NMP and referred to within section 7 of the Statement of Intent.

- **Scenario D: Bespoke capacity** – Further capacity that might be considered to require a “bespoke” solution would be relevant to two reasonably foreseeable scenarios:
 - Firstly, where the phosphate levels in the receiving stretch already exceed the relevant Natural England phosphate target, and further capacity beyond existing permits may result in effects for which the duration, severity and spatial extent of the potential increase in phosphate levels would be sufficient to cast doubt over whether the measures identified through the NMP could still be relied upon to ensure the favourable conservation status of the SAC in respect of phosphate levels by 2027. The delivery of such further capacity would therefore be considered to undermine the deliverability of the NMP, and hence undermine the achievement of the conservation objectives. There is a risk that it might not be possible to ascertain no adverse effect on the integrity of the SAC in relation to such development.
 - Secondly, where the WWTW permit discharges into a stretch that is currently below the relevant Natural England phosphate target and the further capacity would lead to an exceedence of the phosphate targets. Such a scenario is explicitly excluded within the Statement of Intent; the ecological implications of a stretch being pushed into an exceeded state from a non-exceeded state, even for a short period of time, would be considered to represent a threat of an adverse effect to the integrity of the SAC.

4.15 The DTA paper concludes that it would appear to be reasonable for the Council to rely on the wider benefits to be delivered through the NMP in “seeking to identify actions that would enable additional development (beyond existing consents)” as potential mechanisms which would enable development beyond existing permits within any of scenarios A-C above to be delivered without adverse effects upon the integrity of the SAC. However, if WWTW capacity beyond existing permits to serve the proposed development at Leominster in policies LO1 and LO2, and some of the rural areas in policies RA1, RA2, RA6 were to fall into scenario D, the WWTW capacity would need to be subject to specific bespoke mitigation measures being agreed with the relevant authorities, over and above those being delivered through the NMP, which would need to ensure that the proposed development will have no adverse effect on the integrity of the SAC. It is generally expected that such project specific mitigation will need to be provided prior to occupation/utilisation of the development concerned, and will be the responsibility of the project proposer.

4.16 At the recommendation of DTA, development which is not able to deliver such mitigation measures is explicitly excluded within bullet points 4 and 5 of policy SD4 within the Draft Herefordshire Core Strategy, and policy SD4 includes a specific safeguard condition in relation to such further capacity requirements which effectively provides a “conditional approval” in relation to such development. DTA also recommended that the policies relating to development at Leominster are cross-referenced to policy SD4, and this has been done in policy LO1. In addition, policy SS3 (Releasing land for residential development) states that “the release of specific sites may be phased or delayed in order to ensure that necessary infrastructure is in place to support the new development or in order to ensure that there will be no significant adverse effects on the integrity of the River Wye Special Area of Conservation (SAC)”.

4.17 **It is also recommended from this iteration of the HRA that following consultation on the Draft Herefordshire Core Strategy (March 2013), reference to the shortfall in rural STWs is made within the supporting text to the rural area policies RA1, RA2 and RA6, and that cross-reference to policy SD4 is also made in these three policies.**

4.18 Therefore, in accordance with the DTA paper, **it is possible to reasonably ascertain no adverse effects upon the integrity of the River Wye SAC in relation to development**

which cannot be accommodated within existing water discharge permits due to the measures proposed in the signed Statement of Intent between Natural England and the Environment Agency and the forthcoming NMP, as well as the protection afforded in policies SS3 and SD4.

Summary of HRA Findings

4.19 **Table 4.2** below summarises the findings from the Screening and Appropriate Assessment stages in relation to each policy in the Draft Herefordshire Core Strategy. The detailed justifications for these findings are contained in the full screening matrix in **Appendix 1** and the AA findings above.

Table 4.1: Key to colour coding used in Table 4.2

Red	There are likely to be significant effects, and/or adverse effect on integrity.
Green	Significant effects and/or adverse effect on integrity are unlikely.

Table 4.2: Summary of screening and AA findings for each of the Draft Core Strategy Policies

Draft Core Strategy Policies	Was the proposal able to be screened out at the screening stage or was it taken forward to the Appropriate Assessment Stage?	If the mitigation measures identified at the AA stage are implemented, would it be possible that there would be no adverse effect on the integrity of European sites as a result of the proposal?
SS1- Presumption in Favour of Sustainable Development	Screened out.	N/A.
SS2 – Delivering New Homes	Screened out.	N/A.
SS3 – Releasing Land for Residential Development	Screened out.	N/A.
SS4 - Movement and Transportation	Screened out. However, it is recommended that HRA screening for the Core Strategy and subsequently the Hereford Area Plan should revisit the screening conclusion regarding the potential for likely significant effects arising from physical loss or damage to habitats, noise pollution and vibration, light pollution, air pollution and water quality within the River Wye SAC, once more detail about the proposed route for the relief road should be available, and to ensure any further specific mitigation requirements are included.	N/A.
SS5 - Employment Provision	Screened out.	N/A.
SS6 - Addressing Climate	Screened out.	N/A.

Draft Core Strategy Policies	Was the proposal able to be screened out at the screening stage or was it taken forward to the Appropriate Assessment Stage?	If the mitigation measures identified at the AA stage are implemented, would it be possible that there would be no adverse effect on the integrity of European sites as a result of the proposal?
Change		
HD1 - Hereford City Centre	Screened out.	N/A.
HD2 - Hereford Movement	Screened out. However, it is recommended that HRA screening for the Core Strategy and subsequently the Hereford Area Plan should revisit the screening conclusion regarding the potential for likely significant effects arising from physical loss or damage to habitats, noise pollution and vibration, light pollution, air pollution and water quality within the River Wye SAC, once more detail about the proposed route for the relief road should be available, and to ensure any further specific mitigation requirements are included.	N/A.
HD3 - Northern Urban Expansion	Screened out.	N/A.
HD4 - Western Urban Expansion (Three Elms)	Screened out.	N/A.
HD5 - Southern Urban Expansion (Lower Bullingham)	Screened out.	N/A.
HD6 - Hereford Employment Provision	Screened out.	N/A.
BY1 - Development in Bromyard	Screened out.	N/A.
BY2 - Land at Hardwick Bank and south of the A44 Leominster Road	Screened out.	N/A.
KG1 - Development in Kington	Screened out.	N/A.
LB1 - Development in Ledbury	Screened out.	N/A.
LB2 - Land North of the Viaduct	Screened out.	N/A.
LO1 - Development in Leominster	Likely significant effects identified on River Wye SAC. Taken forward to AA.	Yes. No adverse effects upon the integrity of the River Wye SAC due to the measures included in the signed Statement of Intent and the forthcoming NMP, as well as the protection afforded in policies SS3 and SD4 (and referred to in policy LO1).
LO2 - Leominster Urban Extension	Likely significant effects identified on River Wye SAC.	Yes. No adverse effects upon the integrity of the River Wye

Draft Core Strategy Policies	Was the proposal able to be screened out at the screening stage or was it taken forward to the Appropriate Assessment Stage?	If the mitigation measures identified at the AA stage are implemented, would it be possible that there would be no adverse effect on the integrity of European sites as a result of the proposal?
	Taken forward to AA.	SAC due to the measures included in the signed Statement of Intent and the forthcoming NMP, as well as the protection afforded in policies SS3 and SD4 (and referred to in policy LO1).
RW1 – Development in Ross on Wye	Screened out.	N/A.
RW2 – Land at Hildersley	Screened out.	N/A.
RA1 – Rural Housing strategy	Likely significant effects identified on River Wye SAC. Taken forward to AA.	Yes. No adverse effects upon the integrity of the River Wye SAC due to the measures included in the signed Statement of Intent and the forthcoming NMP, as well as the protection afforded in policies SS3 and SD4.
RA2 – Herefordshire’s Villages	Likely significant effects identified on River Wye SAC. Taken forward to AA.	Yes. No adverse effects upon the integrity of the River Wye SAC due to the measures included in the signed Statement of Intent and the forthcoming NMP, as well as the protection afforded in policies SS3 and SD4.
RA3 – Herefordshire’s Countryside	Screened out.	N/A.
RA4 –Agricultural, Forestry and Rural Enterprise Dwellings	Screened out.	N/A.
RA5 – Re-Use of Rural Buildings	Screened out.	N/A.
RA6 – Rural Economy	Likely significant effects identified on River Wye SAC. Taken forward to AA.	Yes. No adverse effects upon the integrity of the River Wye SAC due to the measures included in the signed Statement of Intent and the forthcoming NMP, as well as the protection afforded in policies SS3 and SD4.
H1 – Affordable Housing	Screened out.	N/A.
H2 - Rural Exception Sites	Screened out.	N/A.
H3 – Ensuring a Range and Mix of Housing Types	Screened out.	N/A.
H4 - Traveller Sites	Screened out.	N/A.
SC1 – Social and Community Facilities	Screened out.	N/A.
OS1 – Requirement for Open Space, Sports and Recreation Facilities	Screened out.	N/A.

Draft Core Strategy Policies	Was the proposal able to be screened out at the screening stage or was it taken forward to the Appropriate Assessment Stage?	If the mitigation measures identified at the AA stage are implemented, would it be possible that there would be no adverse effect on the integrity of European sites as a result of the proposal?
OS2 – Meeting Open Space, Sports and Recreation Needs	Screened out.	N/A.
OS3 – Loss of Open Space, Sports or Recreation Facilities	Screened out.	N/A.
MT1 - Traffic Management, Highway Safety and Promoting Active Travel	Screened out.	N/A.
E1 –Employment Provision	Screened out.	N/A.
E2 – Redevelopment of Employment Land	Screened out.	N/A.
E3 – Home Working	Screened out.	N/A.
E.4 - Tourism	Screened out.	N/A.
E.5 – Town Centres	Screened out.	N/A.
E.6 - Primary and Secondary Shopping Frontages	Screened out.	N/A.
LD1 – Local Distinctiveness	Screened out.	N/A.
LD2 – Landscape and Streetscape	Screened out.	N/A.
LD3 – Biodiversity and Geodiversity	Screened out.	N/A.
LD4 Green Infrastructure	Screened out.	N/A.
LD5- Historic Environment and Heritage Assets	Screened out.	N/A.
SD1 – Sustainable Design and Energy Efficiency	Screened out.	N/A.
SD2 – Renewable Energy	Screened out.	N/A.
SD3 - Sustainable Water Management	Screened out.	N/A.
SD4 – Wastewater Treatment and River Water Quality	Screened out.	N/A.
MN1 - Minerals Safeguarding Areas	Screened out.	N/A.
MN2 - Annual Apportionments	Screened out.	N/A.
MN3 - Criteria for the Assessment of Minerals Related Development	Screened out.	N/A.
MN4 - Small-Scale Non-Aggregate Building Stone and Clay Production	Screened out.	N/A.
MN5 - Secondary (Re-Used and Recycled) Aggregates	Screened out.	N/A.
MN 6 – Moreton on Lugg Railhead	Screened out.	N/A.
W1 – Waste Streams and Targets	Screened out.	N/A.
W2 - Location of New Waste Facilities	Screened out.	N/A.
W3 - Existing and Permitted Waste Treatment Sites	Screened out.	N/A.
W4- Anaerobic Digesters	Screened out.	N/A.

Draft Core Strategy Policies	Was the proposal able to be screened out at the screening stage or was it taken forward to the Appropriate Assessment Stage?	If the mitigation measures identified at the AA stage are implemented, would it be possible that there would be no adverse effect on the integrity of European sites as a result of the proposal?
W5 – Waste Minimisation and Management in New Developments	Screened out.	N/A.
ID.1 – Infrastructure Delivery	Screened out.	N/A.

5 Conclusions and Next Steps

- 5.1 The HRA of the Draft Herefordshire Core Strategy has been undertaken in accordance with currently available guidance and based on a precautionary approach as required under the Habitats Regulations. The overall HRA findings reached during the Screening and Appropriate Assessment stages have been described in Chapters 3 and 4 of this report, and summarised in **Table 4.2**.
- 5.2 This HRA report, comprising both the Screening and Appropriate Assessment stages of the HRA for the Draft Herefordshire Core Strategy (March 2013), will be sent to Natural England and the Countryside Council for Wales for their comment as the statutory consultees for the Habitats Regulations (as required by Reg. 102(2)). Given the importance and ongoing work of the Herefordshire Water Steering Group, the report will also be sent to the Environment Agency and the relevant water companies for their consideration.
- 5.3 As the policies in the Draft Core Strategy are taken forward and developed into final policies for inclusion in the Pre-Submission version of the Core Strategy, a further iteration of the HRA will be undertaken in order to determine whether these policies would result in likely significant effects on the integrity of the European sites. If any of the policies vary significantly from the policies already assessed, they may need to be subject to the Screening and Appropriate Assessment stages once more. The HRA report will then be updated to take these changes into account and will be made available alongside the Pre-Submission Version of the Core Strategy.
- 5.4 As stated in Chapter 3, it will also be necessary at the next iteration of the HRA for the Herefordshire Core Strategy to review the screening conclusions in the light of updated information that may be available relating to whether:
- There is forecast to be an increase in traffic (associated with the growth levels proposed in the Core Strategy) above the threshold levels listed in Chapter 2 (paragraph 2.62) along the A465, A40 and A466, to determine whether significant effects as a result of air pollution on the Usk Bat Sites SAC and Wye Valley Woodlands SAC are likely.
 - There is any change in the number of new houses that could be served within the existing permitted headroom at the STWs serving Hereford, the market towns and rural areas once DCWW has updated the analysis based on 2012 flow data (see paragraph 2.79).
- 5.5 Finally, as stated in Chapter 3, and Table 4.2, while the Herefordshire Core Strategy contains sufficient policy safeguards (within policy HD2 and its supporting text) to ensure that any likely significant effects arising from construction of the relief road on the River Wye SAC are avoided, it is recommended that HRA screening for the Hereford Area Plan is undertaken to review the potential for likely significant effects based on the additional detail that should be available at that time about the proposed route and design of the relief road. Additional, more detailed mitigation requirements might need to be included in the Hereford Area Plan policies as well, and the HRA screening should help to identify these.

LUC
March 2013

Appendix 1

Screening Matrix for the Draft Herefordshire Core Strategy (March 2013)

HRA Screening Matrix for the Draft Herefordshire Core Strategy (March 2013)

Draft Herefordshire Core Strategy Policy	Likely activities (operations) to result as a consequence of the policy	Likely effects if policy implemented	European site(s) potentially affected	Potential mitigation measures – if implemented would avoid likely significant effect	Could the policy have likely significant effects on European sites (taking mitigation into account)?
SS1- Presumption in Favour of Sustainable Development	N/A	N/A	N/A	N/A	No: This policy will not lead to development; rather it aims to ensure that new development coming forward under other Core Strategy policies contributes to sustainable development in the County.
SS2 – Delivering New Homes	<p>Housing development</p> <p>Development of supporting infrastructure</p> <p>Increased recreation activities</p> <p>Increased vehicle traffic</p> <p>Increased demand for water abstraction and sewage treatment</p>	<p>Physical loss/damage</p> <p>Non-physical disturbance such as noise and light pollution</p> <p>Air pollution</p> <p>Interruption to hydrological regimes</p>	<p>Uncertain until development proposals come forward, although it is assumed that the strategic housing and employment allocations would be developed. Therefore, potentially any sites within and close to Herefordshire may be affected, but effects are more likely to be experienced at the River Wye SAC, Wye Valley & Forest of Dean Bat Sites and Wye Valley Woodlands and Rhos Goch SACs due to their closer proximity to Hereford, the Market Towns, Rural Service Centres and Hubs and local</p>	<p>Implementation of Draft Core Strategy Policy LD3: Biodiversity and Geodiversity, which specifically aims to avoid adverse impacts on European sites from new development, including housing.</p> <p>Good practice construction techniques including noise suppression measures, hours of operation etc. may help to mitigate potential adverse effects during construction. The measures included in policy SD1: Sustainable Design and Energy Efficiency should help to mitigate potential impacts relating to non-physical disturbance.</p> <p>The specific measures within the individual place-shaping policies (which allocate housing numbers for each of the market towns and the rural areas) relating to sustainable transport and green infrastructure provision should help to avoid adverse impacts relating to</p>	<p>No: While this policy allows for a total of at least 16,500 new homes to be provided in Herefordshire, and this scale of development (and the resulting population growth) could affect European sites directly as a result of construction as well as indirectly as a result of increased vehicle traffic, pressure for recreation space as well as demand for water abstraction and sewage treatment, sufficient mitigation measures are in place within policy SS3, relevant place-shaping policies plus general policies LD3, OS1-3, SD1, SD3 and SD4 to avoid significant effects on European sites. Note that the specific housing allocations for Hereford, the market towns and rural areas are considered separately below in terms of their potential to have a likely significant effect on European</p>

Draft Herefordshire Core Strategy Policy	Likely activities (operations) to result as a consequence of the policy	Likely effects if policy implemented	European site(s) potentially affected	Potential mitigation measures – if implemented would avoid likely significant effect	Could the policy have likely significant effects on European sites (taking mitigation into account)?
			centres, where the majority of new housing is to be located.	<p>increased vehicle traffic and recreation pressure.</p> <p>The measures included in Draft Core Strategy policies OS1-OS3 relating to open space, sport and recreation may help to relieve any increase in pressure on European sites for recreation space, if appropriately implemented.</p> <p>Improved water efficiency measures, metering and addressing leakages in the supply may help to mitigate any additional pressure placed on the water supply as a result of new development. The implementation of Draft Core Strategy policies SD3: Sustainable Water Management and SD4: Water Quality should help to avoid adverse impacts in relation to hydrological regimes at European sites.</p>	sites.
SS3 – Releasing Land for Residential Development	N/A	N/A	N/A	N/A	<p>No: This policy will not itself lead to development; rather it specifies how land for housing development proposed under other Core Strategy policies will be released. Note that the specific housing allocations for Hereford, the market towns and rural areas are considered separately below in terms of their potential to have a likely significant effect on European sites.</p> <p>In addition, this policy provides</p>

Draft Herefordshire Core Strategy Policy	Likely activities (operations) to result as a consequence of the policy	Likely effects if policy implemented	European site(s) potentially affected	Potential mitigation measures – if implemented would avoid likely significant effect	Could the policy have likely significant effects on European sites (taking mitigation into account)?
					strong mitigation for other policies in the Core Strategy because it specifies that the release of specific sites for housing may be phased or delayed in order to ensure that there will be no adverse effects on the integrity of the River Wye SAC.
SS4 - Movement and Transportation	Development of transport infrastructure, including Hereford Relief Road, southern Leominster Relief Road Increased vehicle traffic	Physical loss/damage Non-physical disturbance such as noise, vibration and light pollution Air pollution Interruption to hydrological regimes	Potentially any European sites in and around the County could be affected depending on the location of the transport infrastructure to be provided, but effects are more likely to be experienced at the River Wye SAC, Wye Valley & Forest of Dean Bat Sites and Wye Valley Woodlands SACs due to their proximity to the preferred route for the Hereford Relief Road, as well as Hereford and the Market Towns, which are where a large proportion of development (with associated transport infrastructure and	Implementation of Draft Core Strategy Policy LD3: Biodiversity and Geodiversity specifically aims to avoid adverse impacts on European sites from new development, including transport infrastructure. Good practice construction techniques including noise suppression measures, hours of operation etc. may help to mitigate potential adverse effects during construction. The measures included in policy SD1: Sustainable Design and Energy Efficiency and policy HD2 should help to mitigate potential impacts relating to non-physical disturbance. The measures in this policy to promote sustainable transport provision and use could help to mitigate the potential adverse impacts of this and other Core Strategy policies in relation to increased vehicle traffic and the resulting noise and air pollution. Based on the findings of the Relief Road HRA, during this iteration of the HRA for	No: This policy will result in the development of transport infrastructure, which could have adverse effects on European sites as a result of both physical loss/damage and non-physical disturbance, depending on its specific location. However, the measures in this policy to increase the provision of sustainable transport infrastructure will help to mitigate the potential adverse impacts of other Core Strategy policies in relation to increased vehicle traffic. The policy also provides for the development of larger-scale transport infrastructure including the Hereford relief road and other road improvements (the impacts of which are considered separately under the relevant policies for the market towns below). Policy HD2 now includes stronger safeguards to avoid significant effects on the River Wye

Draft Herefordshire Core Strategy Policy	Likely activities (operations) to result as a consequence of the policy	Likely effects if policy implemented	European site(s) potentially affected	Potential mitigation measures – if implemented would avoid likely significant effect	Could the policy have likely significant effects on European sites (taking mitigation into account)?
			increased traffic) is likely to be focused.	the Core Strategy the HRA team recommended that Herefordshire Council added specific mitigation requirements to policy HD2 and the supporting text to policy HD2 (Hereford Movement). The Policy HD2 in the Draft Core Strategy (March 2013) now requires the relief road to be developed in such a way which avoids and mitigates adverse impacts from physical damage/loss of habitat, noise pollution and vibration, light pollution, air pollution and water quality on the River Wye SAC. The supporting text also states that work on the detailed alignment of the road will be considered during the Hereford Area Plan. Close working with key statutory bodies will be needed to ensure avoid impact on natural assets and appropriate identification of mitigation measures particularly in relation to impacts from physical damage/loss of habitat, noise pollution and vibration, light pollution, air pollution and water quality on the River Wye SAC.	SAC occurring during construction and operation of the Hereford relief road.
SS5 - Employment Provision	Employment development Increased vehicle traffic	Physical damage/disturbance Non-physical disturbance such as noise and light pollution	Potentially any sites within and near to the county may be affected, but effects are more likely to be experienced at the River Wye SAC, Wye	Draft Core Strategy Policy LD3: Biodiversity and Geodiversity specifically aims help to avoid adverse impacts on European sites from new development, including employment. Good practice construction techniques including noise suppression measures,	No: This policy provides for a total of 148ha of employment land over the Plan period throughout Herefordshire. However, sufficient policy safeguards are included within the Core Strategy to avoid or mitigate a likely significant effect

Draft Herefordshire Core Strategy Policy	Likely activities (operations) to result as a consequence of the policy	Likely effects if policy implemented	European site(s) potentially affected	Potential mitigation measures – if implemented would avoid likely significant effect	Could the policy have likely significant effects on European sites (taking mitigation into account)?
		<p>Air pollution</p> <p>Interruption to hydrological regimes</p>	<p>Valley & Forest of Dean Bat Sites and Wye Valley Woodlands and Rhos Goch SACs due to their closer proximity to Hereford, the Market Towns, Rural Service Centres and Hubs and local centres, where the majority of new employment land is to be located.</p>	<p>hours of operation etc. may help to mitigate potential adverse effects during construction. The measures included in policy SD1: Sustainable Design and Energy Efficiency should help to mitigate potential impacts relating to non-physical disturbance.</p> <p>The specific measures within the individual place-shaping policies (which allocate employment land for each of the market towns and the rural areas) relating to sustainable transport should help to avoid adverse impacts relating to increased vehicle traffic.</p> <p>Improved water efficiency measures, metering and addressing leakages in the supply may help to mitigate any additional pressure placed on the water supply as a result of new development. The implementation of Draft Core Strategy policies SD3: Sustainable Water Management and SD4: Water Quality should help to avoid adverse impacts in relation to hydrological regimes at European sites. Water quality in the River Wye SAC is also specifically addressed through the Nutrient Management Plan that Natural England and the Environment Agency have committed to produce, through their signed Statement of Intent (February 2013).</p>	<p>from the potential effects identified. The EA/NE Nutrient Management Plan should also help to ensure that effects on water quality (from any pressure on STW capacity from new employment development) in the River Wye SAC are not significant. Note that the specific employment land allocations for the market towns and rural areas are considered separately below in terms of their potential to have significant effects on European sites.</p>

Draft Herefordshire Core Strategy Policy	Likely activities (operations) to result as a consequence of the policy	Likely effects if policy implemented	European site(s) potentially affected	Potential mitigation measures – if implemented would avoid likely significant effect	Could the policy have likely significant effects on European sites (taking mitigation into account)?
				Measures in the policy to allow for live-work units could help to mitigate the potential impacts of this and other Core Strategy policies in relation to increased vehicle traffic.	
SS6 - Addressing Climate Change	Development of renewable energy infrastructure	Physical damage/disturbance Non-physical disturbance e.g. noise pollution	Potentially any sites within and near to the county may be affected, but effects are more likely to be experienced at the River Wye SAC, Wye Valley & Forest of Dean Bat Sites and Wye Valley Woodlands SACs due to their proximity to Hereford and the Market Towns, which are where a large proportion of development is likely to be focused.	<p>Draft Core Strategy Policy LD3: Biodiversity and Geodiversity specifically aims help to avoid adverse impacts on European sites from new development, including renewable energy infrastructure.</p> <p>Good practice construction techniques including noise suppression measures, hours of operation etc. may help to mitigate potential adverse effects during construction. The measures included in policy SD1: Sustainable Design and Energy Efficiency should help to mitigate potential impacts relating to non-physical disturbance.</p> <p>Draft Core Strategy policy SD2: Renewable Energy requires renewable energy developments to avoid adverse impacts on international designations for the conservation of the natural environment (taken to include European sites).</p> <p>The policy refers to the aim of increasing the use of sustainable transport, which could help to mitigate the potential adverse impacts of other Core Strategy</p>	<p>No: Most of this policy will not lead to development (rather it sets out criteria aiming to ensure that new development reduces Herefordshire’s contribution to climate change), but the policy could result in the development of renewable energy infrastructure which could potentially affect European sites, depending in its location. However, there is sufficient mitigation provided within the Draft Core Strategy policies LD3, SD1 and SD2 to avoid a likely significant effect.</p> <p>Policy SS6 itself also refers to the aim of increasing the use of sustainable transport, which could help to mitigate the potential adverse impacts of other Core Strategy policies in relation to increased vehicle traffic.</p>

Draft Herefordshire Core Strategy Policy	Likely activities (operations) to result as a consequence of the policy	Likely effects if policy implemented	European site(s) potentially affected	Potential mitigation measures – if implemented would avoid likely significant effect	Could the policy have likely significant effects on European sites (taking mitigation into account)?
				policies in relation to increased vehicle traffic.	
HD1 - Hereford City Centre	<p>Housing and infrastructure development</p> <p>Increase in recreation activities</p> <p>Increase in vehicle traffic</p> <p>Increased demand for water abstraction and treatment</p>	<p>Physical disturbance/damage</p> <p>Non-physical disturbance such as noise, vibration and light pollution</p> <p>Interruption to hydrological regimes</p> <p>Air pollution</p>	River Wye SAC	<p>Draft Core Strategy Policy LD3: Biodiversity and Geodiversity specifically aims help to avoid adverse impacts on European sites from new development.</p> <p>Good practice construction techniques including noise suppression measures, hours of operation etc. may help to mitigate potential adverse effects during construction. The measures included in policy SD1: Sustainable Design and Energy Efficiency should help to mitigate potential impacts relating to non-physical disturbance.</p> <p>Improved water efficiency measures, metering and addressing leakages in the supply may help to mitigate any additional pressure placed on the water supply as a result of new development. The implementation of Draft Core Strategy policies SD3: Sustainable Water Management and SD4: Water Quality should help to avoid adverse impacts in relation to hydrological regimes at European sites. Water quality in the River Wye SAC is also specifically addressed through the Nutrient Management Plan that Natural England and the Environment Agency have committed to produce, through their</p>	<p>No: This policy provides for large-scale development within Hereford which will therefore be located within reasonably close proximity of the River Wye. However, sufficient policy safeguards are included within the Core Strategy to avoid or mitigate a likely significant effect (policies LD3, SD1, SD3, SD4 and OS1-OS3). DCWW confirmed that there are sufficient water resources to meet the increases in demand from Herefordshire throughout their operating area and the plan period. DCWW has also confirmed that there is sufficient existing headroom within the STWs serving Hereford to meet the planned level of growth without having a significant effect on the River Wye SAC.</p>

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				<p>signed Statement of Intent (February 2013).</p> <p>The measures included in Draft Core Strategy policies OS1-OS3 relating to open space, sport and recreation may help to relieve any increase in pressure on European sites for recreation space, if appropriately implemented.</p>	
HD2 - Hereford Movement	<p>Infrastructure development</p> <p>Increased vehicle traffic directly adjacent to the River Wye SAC</p>	<p>Physical disturbance/damage</p> <p>Non-physical disturbance such as noise, vibration and light pollution</p> <p>Air pollution</p>	River Wye SAC	<p>Good practice construction techniques including noise suppression measures, hours of operation etc. may help to mitigate potential adverse effects during construction. The measures included in policy SD1: Sustainable Design and Energy Efficiency should help to mitigate potential impacts relating to non-physical disturbance.</p> <p>The measures in this policy to encourage sustainable transport use may help to mitigate the potential adverse impacts of this and other Core Strategy policies in relation to increased vehicle traffic.</p> <p>Based on the findings of the Relief Road HRA, during this iteration of the HRA for the Core Strategy, the HRA team recommended that Herefordshire Council added specific mitigation requirements to policy HD2 and the supporting text to policy HD2 (Hereford Movement). The Policy HD2 in the Draft Core Strategy (March 2013) now requires the relief</p>	<p>No: While this policy will result in the development of a relief road to the west of Hereford, which will need to cross the River Wye SAC, the HRA for the Relief Road has shown that likely significant effects could be avoided or mitigated through specific design, construction and operation measures. Policy HD2 now requires any proposal to be developed in such a way which avoids and mitigates adverse impacts from physical damage/loss of habitat, noise pollution and vibration, light pollution, air pollution and water quality on the River Wye SAC. This HRA has also recommended that screening of the Hereford Area Plan will also need to be undertaken, when further detail about the proposed route and potential design of the relief road may be available.</p>

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				road to be developed in such a way which avoids and mitigates adverse impacts from physical damage/loss of habitat, noise pollution and vibration, light pollution, air pollution and water quality on the River Wye SAC. The supporting text also states that work on the detailed alignment of the road will be considered during the Hereford Area Plan. Close working with key statutory bodies will be needed to ensure avoid impact on natural assets and appropriate identification of mitigation measures particularly in relation to impacts from physical damage/loss of habitat, noise pollution and vibration, light pollution, air pollution and water quality on the River Wye SAC.	
HD3 - Northern Urban Expansion	Housing and infrastructure development Increase in recreation activities Increase in vehicle traffic Increased demand for water abstraction and treatment	Non-physical disturbance such as noise, vibration and light pollution Air pollution Interruption to hydrological regimes	River Wye SAC	Draft Core Strategy Policy LD3: Biodiversity and Geodiversity specifically aims help to avoid adverse impacts on European sites from new development. Good practice construction techniques including noise suppression measures, hours of operation etc. may help to mitigate potential adverse effects during construction. The measures included in policy SD1: Sustainable Design and Energy Efficiency should help to mitigate potential impacts relating to non-physical disturbance.	No: The Holmer West development site is not directly adjacent to or overlapping with any European sites, but it lies within reasonably close proximity of the River Wye SAC. However, sufficient policy safeguards are included within the Core Strategy to avoid or mitigate a likely significant effect (policies LD3, SD1, SD3, SD4 and OS1-OS3). DCWW confirmed that there are sufficient water resources to meet the increases in demand from Herefordshire throughout their

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				<p>The measures included in Draft Core Strategy policies OS1-OS3 relating to open space, sport and recreation may help to relieve any increase in pressure on European sites for recreation space, if appropriately implemented.</p> <p>Improved water efficiency measures, metering and addressing leakages in the supply may help to mitigate any additional pressure placed on the water supply as a result of new development. The implementation of Draft Core Strategy policies SD3: Sustainable Water Management and SD4: Water Quality should help to avoid adverse impacts in relation to hydrological regimes at European sites. Water quality in the River Wye SAC is also specifically addressed through the Nutrient Management Plan that Natural England and the Environment Agency have committed to produce, through their signed Statement of Intent (February 2013).</p>	<p>operating area and the plan period. DCWW has also confirmed that there is sufficient existing headroom within the STWs serving Hereford to meet the planned level of growth without having a significant effect on the River Wye SAC.</p>
HD4 - Western Urban Expansion (Three Elms)	<p>Housing and infrastructure development</p> <p>Increase in recreation activities</p> <p>Increase in</p>	<p>Non-physical disturbance such as noise, vibration and light pollution</p> <p>Interruption to hydrological regimes</p>	River Wye SAC	<p>Draft Core Strategy Policy LD3: Biodiversity and Geodiversity specifically aims help to avoid adverse impacts on European sites from new development.</p> <p>Good practice construction techniques including noise suppression measures, hours of operation etc. may help to</p>	<p>No: The proposed development site at Three Elms is not directly adjacent to or overlapping with any European sites, but it lies within reasonably close proximity of the River Wye SAC. However, sufficient policy safeguards are included within the Core Strategy to avoid or</p>

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	<p>vehicle traffic</p> <p>Increased demand for water abstraction and treatment</p>	Air pollution		<p>mitigate potential adverse effects during construction. The measures included in policy SD1: Sustainable Design and Energy Efficiency should help to mitigate potential impacts relating to non-physical disturbance.</p> <p>The measures included in Draft Core Strategy policies OS1-OS3 relating to open space, sport and recreation may help to relieve any increase in pressure on European sites for recreation space, if appropriately implemented.</p> <p>Improved water efficiency measures, metering and addressing leakages in the supply may help to mitigate any additional pressure placed on the water supply as a result of new development. The implementation of Draft Core Strategy policies SD3: Sustainable Water Management and SD4: Water Quality should help to avoid adverse impacts in relation to hydrological regimes at European sites. Water quality in the River Wye SAC is also specifically addressed through the Nutrient Management Plan that Natural England and the Environment Agency have committed to produce, through their signed Statement of Intent (February 2013).</p>	mitigate a likely significant effect (policies LD3, SD1, SD3, SD4 and OS1-OS3). DCWW confirmed that there are sufficient water resources to meet the increases in demand from Herefordshire throughout their operating area and the plan period. DCWW has also confirmed that there is sufficient existing headroom within the STWs serving Hereford to meet the planned level of growth without having a significant effect on the River Wye SAC.
HD5 - Southern	Housing and	Non-physical	River Wye SAC	Draft Core Strategy Policy LD3:	No: The Lower Bullingham

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Urban Expansion (Lower Bullingham)	<p>infrastructure development</p> <p>Increase in recreation activities</p> <p>Increase in vehicle traffic</p> <p>Increased demand for water abstraction and treatment</p>	<p>disturbance such as noise, vibration and light pollution</p> <p>Interruption to hydrological regimes</p> <p>Air pollution</p>		<p>Biodiversity and Geodiversity specifically aims help to avoid adverse impacts on European sites from new development.</p> <p>Good practice construction techniques including noise suppression measures, hours of operation etc. may help to mitigate potential adverse effects during construction. The measures included in policy SD1: Sustainable Design and Energy Efficiency should help to mitigate potential impacts relating to non-physical disturbance.</p> <p>The measures included in Draft Core Strategy policies OS1-OS3 relating to open space, sport and recreation may help to relieve any increase in pressure on European sites for recreation space, if appropriately implemented.</p> <p>Improved water efficiency measures, metering and addressing leakages in the supply may help to mitigate any additional pressure placed on the water supply as a result of new development. The implementation of Draft Core Strategy policies SD3: Sustainable Water Management and SD4: Water Quality should help to avoid adverse impacts in relation to hydrological regimes at European sites. Water quality in the River Wye SAC is also specifically addressed through the Nutrient Management Plan that Natural England</p>	<p>development site is not directly adjacent to or overlapping with any European sites, but it lies within reasonably close proximity of the River Wye SAC. However, sufficient policy safeguards are included within the Core Strategy to avoid or mitigate a likely significant effect (policies LD3, SD1, SD3, SD4 and OS1-OS3). DCWW confirmed that there are sufficient water resources to meet the increases in demand from Herefordshire throughout their operating area and the plan period. DCWW has also confirmed that there is sufficient existing headroom within the STWs serving Hereford to meet the planned level of growth without having a significant effect on the River Wye SAC.</p>

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				and the Environment Agency have committed to produce, through their signed Statement of Intent (February 2013).	
HD6 - Hereford Employment Provision	<p>Development of employment land</p> <p>Increase in vehicle traffic</p> <p>Increased demand for water abstraction and treatment</p>	<p>Physical disturbance/damage</p> <p>Non-physical disturbance such as noise, vibration and light pollution</p> <p>Interruption to hydrological regimes</p> <p>Air pollution</p>	River Wye SAC	<p>Draft Core Strategy Policy LD3: Biodiversity and Geodiversity specifically aims help to avoid adverse impacts on European sites from new development.</p> <p>Good practice construction techniques including noise suppression measures, hours of operation etc. may help to mitigate potential adverse effects during construction. The measures included in policy SD1: Sustainable Design and Energy Efficiency should help to mitigate potential impacts relating to non-physical disturbance.</p> <p>The measures included in Draft Core Strategy policies OS1-OS3 relating to open space, sport and recreation may help to relieve any increase in pressure on European sites for recreation space, if appropriately implemented.</p> <p>Improved water efficiency measures, metering and addressing leakages in the supply may help to mitigate any additional pressure placed on the water supply as a result of new development. The implementation of Draft Core Strategy policies SD3: Sustainable Water Management and SD4: Water Quality</p>	<p>No: This policy will result in employment development in Hereford, which could be within fairly close proximity of the River Wye SAC. However, sufficient policy safeguards are included within the Core Strategy to avoid or mitigate a likely significant effect (policies LD3, SD1, SD3, SD4 and OS1-OS3). DCWW confirmed that there are sufficient water resources to meet the increases in demand from Herefordshire throughout their operating area and the plan period. DCWW has also confirmed that there is sufficient existing headroom within the STWs serving Hereford to meet the planned level of growth without having a significant effect on the River Wye SAC.</p>

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				<p>should help to avoid adverse impacts in relation to hydrological regimes at European sites. Water quality in the River Wye SAC is also specifically addressed through the Nutrient Management Plan that Natural England and the Environment Agency have committed to produce, through their signed Statement of Intent (February 2013).</p>	
<p>BY1 - Development in Bromyard</p>	<p>Housing and infrastructure development</p> <p>Development of employment land</p> <p>Increased demand for water abstraction and treatment</p> <p>Increased vehicle traffic</p> <p>Increased recreation pressure</p>	<p>Interruption to hydrological regimes</p> <p>Increased air pollution</p> <p>Physical damage from erosion/trampling</p>	<p>The River Frome is a tributary of the River Wye SAC.</p> <p>Impacts associated with increased air pollution and recreation pressure could potentially affect any European sites in and around Herefordshire, although the River Wye SAC is most likely to be affected as it is the closest European site to Bromyard.</p>	<p>Draft Core Strategy Policy LD3: Biodiversity and Geodiversity specifically aims help to avoid adverse impacts on European sites from new development.</p> <p>The policy itself states that development should have no adverse impact on water quality in the River Frome (a tributary of the River Wye SAC).</p> <p>Improved water efficiency measures, metering and addressing leakages in the supply may help to mitigate any additional pressure placed on the water supply as a result of new development. The implementation of Draft Core Strategy policies SD3: Sustainable Water Management and SD4: Water Quality should help to avoid adverse impacts in relation to hydrological regimes at European sites. Water quality in the River Wye SAC is also specifically addressed through the Nutrient</p>	<p>No: The proposals for Bromyard make provision for the development of around 500 new homes and 5ha of employment land. Bromyard is some distance from the nearest European site, and therefore physical damage or disturbance from construction will not have a likely significant effect. The River Frome is a tributary of the River Wye SAC, but DCWW has confirmed that there is sufficient existing headroom within the STWs serving Bromyard to meet the planned level of growth without having a significant effect on the River Wye SAC. DCWW has also confirmed that there are sufficient water resources to meet the increases in demand from Herefordshire throughout their operating area and the plan period. By contributing to a general increase</p>

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				<p>Management Plan that Natural England and the Environment Agency have committed to produce, through their signed Statement of Intent (February 2013).</p> <p>The specific measures within the individual place-shaping policies including BY2 relating to sustainable transport and green infrastructure provision should help to avoid adverse impacts relating to increased vehicle traffic and recreation pressure. SS4 also aims to increase sustainable transport use.</p> <p>In addition, the measures included in Draft Core Strategy policies OS1-OS3 relating to open space, sport and recreation may help to relieve any increase in pressure on European sites for recreation space, if appropriately implemented.</p>	<p>in the local population and in local economic activity, this policy could also contribute to an increase in vehicle traffic throughout Herefordshire, which could adversely affect local air quality, as well as increased pressure for recreation space. However, sufficient policy safeguards are included within the Core Strategy to avoid or mitigate a likely significant effect (policies LD3, SS4, BY2 and OS1-OS3).</p>
BY2 - Land at Hardwick Bank and south of the A44 Leominster Road	<p>Housing and infrastructure development</p> <p>Development of employment land</p> <p>Increased demand</p>	<p>Interruption to hydrological regimes</p> <p>Increased air pollution</p> <p>Physical damage</p>	<p>The River Frome is a tributary of the River Wye SAC.</p> <p>Impacts associated with increased air pollution and recreation pressure could potentially affect</p>	<p>Policy BY1, which is the overarching policy for development at Bromyard, states that development should have no adverse impact on water quality in the River Frome.</p> <p>Improved water efficiency measures, metering and addressing leakages in the</p>	<p>No: This policy for an urban extension at Bromyard makes provision for the development of around 350 new homes and 5ha of employment land. Bromyard is some distance from the nearest European site, and therefore</p>

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	<p>for water abstraction and treatment</p> <p>Increased vehicle traffic</p> <p>Increased recreation pressure</p>	<p>from erosion/trampling</p>	<p>any European sites in and around Herefordshire, although the River Wye SAC is most likely to be affected as it is the closest European site to Bromyard.</p>	<p>supply may help to mitigate any additional pressure placed on the water supply as a result of new development. The implementation of Draft Core Strategy policies SD3: Sustainable Water Management and SD4: Water Quality should help to avoid adverse impacts in relation to hydrological regimes at European sites. Water quality in the River Wye SAC is also specifically addressed through the Nutrient Management Plan that Natural England and the Environment Agency have committed to produce, through their signed Statement of Intent (February 2013).</p> <p>The specific measures within the individual place-shaping policies including BY2 itself relating to sustainable transport and green infrastructure provision should help to avoid adverse impacts relating to increased vehicle traffic and recreation pressure. SS4 also aims to increase sustainable transport use.</p> <p>In addition, the measures included in Draft Core Strategy policies OS1-OS3 relating to open space, sport and recreation may help to relieve any increase in pressure on European sites for recreation space, if appropriately implemented.</p>	<p>physical damage or disturbance from construction will not have a likely significant effect. The River Frome is a tributary of the River Wye SAC, but DCWW has confirmed that there is sufficient existing headroom within the STWs serving Bromyard to meet the planned level of growth without having a significant effect on the River Wye SAC. DCWW has also confirmed that there are sufficient water resources to meet the increases in demand from Herefordshire throughout their operating area and the plan period.</p> <p>By contributing to a general increase in the local population and in local economic activity, this policy could also contribute to an increase in vehicle traffic throughout Herefordshire, which could adversely affect local air quality, as well as increased pressure for recreation space. However, sufficient policy safeguards are included within the Core Strategy to avoid or mitigate a likely significant effect (policies LD3, SS4, BY2 itself and OS1-OS3).</p>

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KG1 – Development in Kington	<p>Housing and infrastructure development</p> <p>Small-scale employment development.</p> <p>Increased demand for water abstraction and treatment</p> <p>Increased vehicle traffic</p> <p>Increased recreation pressure</p>	<p>Interruption to hydrological regimes</p> <p>Increased air pollution</p> <p>Physical damage from erosion/trampling</p>	<p>River Wye SAC.</p> <p>Impacts associated with increased air pollution and recreation pressure could potentially affect any European sites in and around Herefordshire, although the River Wye SAC is most likely to be affected as it is the closest European site to Kington.</p>	<p>Improved water efficiency measures, metering and addressing leakages in the supply may help to mitigate any additional pressure placed on the water supply as a result of new development. The implementation of Draft Core Strategy policies SD3: Sustainable Water Management and SD4: Water Quality should help to avoid adverse impacts in relation to hydrological regimes at European sites. Water quality in the River Wye SAC is also specifically addressed through the Nutrient Management Plan that Natural England and the Environment Agency have committed to produce, through their signed Statement of Intent (February 2013).</p> <p>The specific measures within the individual place-shaping policies including KG1 itself relating to sustainable transport and green infrastructure provision should help to avoid adverse impacts relating to increased vehicle traffic and recreation pressure. SS4 also aims to increase sustainable transport use.</p> <p>In addition, the measures included in Draft Core Strategy policies OS1-OS3 relating to open space, sport and recreation may help to relieve any increase in pressure on European sites</p>	<p>No: This policy allocates around 200 new homes at Kington, as well as some small-scale employment provision. Kington is some distance from any European sites, and therefore direct physical damage or disturbance from construction will not have a likely significant effect.</p> <p>The development at Kington could contribute to an overall increase in vehicle traffic and recreation pressure in the county, as well as increased demand for water abstraction and treatment. However, DCWW confirmed that there are sufficient water resources to meet the increases in demand from Herefordshire throughout their operating area and the plan period. DCWW has also confirmed that there is sufficient existing headroom within the STWs serving Kington to meet the planned level of growth without having a significant effect on the River Wye SAC.</p> <p>In addition, sufficient policy safeguards are included within the Core Strategy to avoid or mitigate a likely significant effect from recreation pressure or air pollution (policies LD3, SS4, KG1 itself and OS1-OS3).</p>

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				for recreation space, if appropriately implemented.	
LB1 – Development in Ledbury	<p>Housing and infrastructure development</p> <p>Development of employment land</p> <p>Increased demand for water abstraction and treatment</p> <p>Increased vehicle traffic</p> <p>Increased recreation pressure</p>	<p>Interruption to hydrological regimes</p> <p>Increased air pollution</p> <p>Physical damage from erosion/trampling</p>	<p>River Wye SAC.</p> <p>Impacts associated with increased air pollution and recreation pressure could potentially affect any European sites in and around Herefordshire, although the River Wye SAC is most likely to be affected as it is the closest European site to Ledbury.</p>	<p>Improved water efficiency measures, metering and addressing leakages in the supply may help to mitigate any additional pressure placed on the water supply as a result of new development. The implementation of Draft Core Strategy policies SD3: Sustainable Water Management and SD4: Water Quality should help to avoid adverse impacts in relation to hydrological regimes at European sites. Water quality in the River Wye SAC is also specifically addressed through the Nutrient Management Plan that Natural England and the Environment Agency have committed to produce, through their signed Statement of Intent (February 2013).</p> <p>The specific measures within the individual place-shaping policies including LB1 itself relating to sustainable transport and green infrastructure provision should help to avoid adverse impacts relating to increased vehicle traffic and recreation pressure. SS4 also aims to increase sustainable transport use.</p> <p>In addition, the measures included in Draft Core Strategy policies OS1-OS3</p>	<p>No: The proposals for Ledbury make provision for the development of around 800 new homes and 12ha of employment land, but this is focused in and around the town which is located some distance away from any European sites, therefore physical damage or disturbance from construction will not have a likely significant effect. The policy allows for the development of around 800 new homes and the resulting increase in demand for water abstraction and treatment may place increased pressure on nearby sites such as the River Wye SAC. However, DCWW confirmed that there are sufficient water resources to meet the increases in demand from Herefordshire throughout their operating area and the plan period. In addition, the sewage treatment works serving Ledbury discharges into the River Leadon which is not a designated European site within Herefordshire (+15km), so there will not be a likely significant effect on any European site.</p> <p>By contributing to a general increase in the local population and in local</p>

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				relating to open space, sport and recreation may help to relieve any increase in pressure on European sites for recreation space, if appropriately implemented.	economic activity, this policy could also contribute to an increase in vehicle traffic throughout Herefordshire, which could adversely affect local air quality, as well as increased pressure for recreation space. However, sufficient policy safeguards are included within the Core Strategy to avoid or mitigate a likely significant effect from recreation pressure or air pollution (policies LD3, SS4, LB1 itself and OS1-OS3).
LB2 – Land North of the Viaduct	<p>Housing and infrastructure development</p> <p>Increased demand for water abstraction and treatment</p> <p>Increased vehicle traffic</p> <p>Increased recreation pressure</p>	<p>Interruption to hydrological regimes</p> <p>Increased air pollution</p> <p>Physical damage from erosion/trampling</p>	<p>River Wye SAC.</p> <p>Impacts associated with increased air pollution and recreation pressure could potentially affect any European sites in and around Herefordshire, although the River Wye SAC is most likely to be affected as it is the closest European site to Ledbury.</p>	<p>Improved water efficiency measures, metering and addressing leakages in the supply may help to mitigate any additional pressure placed on the water supply as a result of new development. The implementation of Draft Core Strategy policies SD3: Sustainable Water Management and SD4: Water Quality should help to avoid adverse impacts in relation to hydrological regimes at European sites. Water quality in the River Wye SAC is also specifically addressed through the Nutrient Management Plan that Natural England and the Environment Agency have committed to produce, through their signed Statement of Intent (February 2013).</p> <p>The specific measures within the</p>	<p>No: The policy for this urban extension at Ledbury makes provision for the development of around 700 new homes, but this is focused to the north of the town which is located some distance away from any European sites, therefore physical damage or disturbance from construction will not have a likely significant effect. The proposal allows for the development of around 700 new homes and the resulting increase in demand for water abstraction and treatment may place increased pressure on nearby sites such as the River Wye SAC. However, DCWW confirmed that there are sufficient water resources to meet the increases in</p>

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				<p>individual place-shaping policies including LB2 itself relating to sustainable transport and green infrastructure provision should help to avoid adverse impacts relating to increased vehicle traffic and recreation pressure. SS4 also aims to increase sustainable transport use.</p> <p>In addition, the measures included in Draft Core Strategy policies OS1-OS3 relating to open space, sport and recreation may help to relieve any increase in pressure on European sites for recreation space, if appropriately implemented.</p>	<p>demand from Herefordshire throughout their operating area and the plan period. In addition, the sewage treatment works serving Ledbury discharges into the River Leadon which is not a designated European site within Herefordshire (+15km), so there will not be a likely significant effect on any European site.</p> <p>By contributing to a general increase in the local population, this policy could also contribute to an increase in vehicle traffic throughout Herefordshire, which could adversely affect local air quality, as well as increased pressure for recreation space. However, sufficient policy safeguards are included within the Core Strategy to avoid or mitigate a likely significant effect from recreation pressure or air pollution (policies LD3, SS4, LB2 itself and OS1-OS3).</p>
LO1 – Development in Leominster	<p>Housing and infrastructure development</p> <p>Development of a southern link road</p> <p>Increase in recreation</p>	<p>Interruption to hydrological regimes</p> <p>Increased air pollution</p> <p>Physical damage from</p>	The potential effects of this policy could combine with increased pressure on sewage treatment capacity discharging to the River Wye in association with development planned	Improved water efficiency measures, metering and addressing leakages in the supply may help to mitigate any additional pressure placed on the water supply as a result of new development. The implementation of Draft Core Strategy policies SD3: Sustainable Water Management and SD4: Water Quality	<p>No for physical damage, disturbance, air pollution, interruption to water levels: The proposals for Leominster make provision for the development of at least 2,300 new homes and 10ha of additional employment land, but this is focused in and around the town</p>

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	<p>activities</p> <p>Increase in vehicle traffic</p> <p>Increased water abstraction and treatment</p>	erosion/trampling	<p>at Ledbury, Hereford, Bromyard and Ross-on-Wye.</p> <p>Impacts associated with increased air pollution and recreation pressure could potentially affect any European sites in and around Herefordshire, although the River Wye SAC is most likely to be affected as it is the closest European site to Leominster.</p>	<p>should help to avoid adverse impacts in relation to hydrological regimes at European sites. Water quality in the River Wye SAC is also specifically addressed through the Nutrient Management Plan that Natural England and the Environment Agency have committed to produce, through their signed Statement of Intent (February 2013).</p> <p>The specific measures within the individual place-shaping policies including LO1 itself relating to sustainable transport and green infrastructure provision should help to avoid adverse impacts relating to increased vehicle traffic and recreation pressure. SS4 also aims to increase sustainable transport use.</p> <p>In addition, the measures included in Draft Core Strategy policies OS1-OS3 relating to open space, sport and recreation may help to relieve any increase in pressure on European sites for recreation space, if appropriately implemented.</p>	<p>which is located some distance away from any European sites, therefore physical damage or disturbance from construction is not expected to have a likely significant effect.</p> <p>By contributing to a general increase in the local population and in local economic activity, this policy could also contribute to an increase in vehicle traffic throughout Herefordshire, which could adversely affect local air quality, as well as increased pressure for recreation space. In addition, the option allows for the development of the Leominster southern link road, which, dependent on the exact location and the resulting changes in patterns of traffic movements, may result in an adverse impact in terms of air pollution at the River Wye SAC from increased traffic volumes. However, sufficient policy safeguards are included within the Core Strategy to avoid or mitigate a likely significant effect from recreation pressure or air pollution (policies LD3, SS4, LO1 itself and OS1-OS3).</p> <p>With respect to water abstraction, DCWW has confirmed that there are sufficient water resources to meet the increases in demand from</p>

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					<p>Herefordshire throughout their operating area and the plan period.</p> <p>Yes for water quality impacts on River Wye SAC: The policy allows for the development of at least 2,300 new homes and the resulting increase in demand for water treatment may be likely to have a significant effect on the River Wye SAC, as the STW serving Leominster does not have sufficient existing headroom available to meet the planned growth at Leominster.</p>
LO2 – Leominster Urban Extension	<p>Housing and infrastructure development</p> <p>Development of a southern link road</p> <p>Increase in recreation activities</p> <p>Increase in vehicle traffic</p> <p>Increased water abstraction and treatment</p>	<p>Interruption to hydrological regimes</p> <p>Increased air pollution</p> <p>Physical damage from erosion/trampling</p>	<p>The potential effects of this policy could combine with increased pressure on sewage treatment capacity discharging to the River Wye in association with development planned at Ledbury, Hereford, Bromyard and Ross-on-Wye.</p> <p>Impacts associated with increased air pollution and recreation pressure could potentially affect any European sites in and around Herefordshire, although</p>	<p>Improved water efficiency measures, metering and addressing leakages in the supply may help to mitigate any additional pressure placed on the water supply as a result of new development. The implementation of Draft Core Strategy policies SD3: Sustainable Water Management and SD4: Water Quality should help to avoid adverse impacts in relation to hydrological regimes at European sites. Water quality in the River Wye SAC is also specifically addressed through the Nutrient Management Plan that Natural England and the Environment Agency have committed to produce, through their signed Statement of Intent (February 2013).</p>	<p>No for physical damage, disturbance, air pollution, interruption to water levels: This policy for the urban extension at Leominster makes provision for the development of around 1,500 new homes, but this is focused to the south of Leominster town which is located some distance away from any European sites, therefore physical damage or disturbance from construction is not likely to have a significant effect.</p> <p>By contributing to a general increase in the local population and in local economic activity, this policy could also contribute to an increase in vehicle traffic throughout</p>

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			<p>the River Wye SAC is most likely to be affected as it is the closest European site to Leominster.</p>	<p>The specific measures within the individual place-shaping policies including LO2 itself relating to sustainable transport and green infrastructure provision should help to avoid adverse impacts relating to increased vehicle traffic and recreation pressure. SS4 also aims to increase sustainable transport use.</p> <p>In addition, the measures included in Draft Core Strategy policies OS1-OS3 relating to open space, sport and recreation may help to relieve any increase in pressure on European sites for recreation space, if appropriately implemented.</p>	<p>Herefordshire, which could adversely affect local air quality, as well as increased pressure for recreation space. In addition, the option allows for the development of the Leominster southern link road, which, dependent on the exact location and the resulting changes in patterns of traffic movements, may result in an adverse impact in terms of air pollution at the River Wye SAC from increased traffic volumes. However, sufficient policy safeguards are included within the Core Strategy to avoid or mitigate a likely significant effect from recreation pressure or air pollution (policies LD3, SS4, LO2 itself and OS1-OS3).</p> <p>With respect to water abstraction, DCWW has confirmed that there are sufficient water resources to meet the increases in demand from Herefordshire throughout their operating area and the plan period.</p> <p>Yes for water quality impacts on River Wye SAC: The policy allows for the development of around 1,500 new homes and the resulting increase in demand for water treatment is likely to have a significant effect on the River Wye SAC, as the STW serving Leominster</p>

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					does not have sufficient existing headroom available to meet the planned growth at Leominster.
RW1 – Development in Ross on Wye	<p>Housing and infrastructure development</p> <p>Increase in recreation activities</p> <p>Increase in vehicle traffic</p> <p>Increased water abstraction and treatment</p>	<p>Interruption to hydrological regimes</p> <p>Increased air pollution</p> <p>Physical damage from erosion/trampling</p>	<p>Hydrological impacts are most likely to affect the River Wye SAC.</p> <p>The sites most likely to be affected by an increase in recreation activities and/or air pollution in the surrounding area include the Wye Valley Woodlands SAC, the Wye Valley and Forest of Dean Bat Sites SAC.</p>	<p>Improved water efficiency measures, metering and addressing leakages in the supply may help to mitigate any additional pressure placed on the water supply as a result of new development. The implementation of Draft Core Strategy policies SD3: Sustainable Water Management and SD4: Water Quality should help to avoid adverse impacts in relation to hydrological regimes at European sites. Water quality in the River Wye SAC is also specifically addressed through the Nutrient Management Plan that Natural England and the Environment Agency have committed to produce, through their signed Statement of Intent (February 2013).</p> <p>The specific measures within the individual place-shaping policies including RW1 itself relating to sustainable transport and green infrastructure provision should help to avoid adverse impacts relating to increased vehicle traffic and recreation pressure. SS4 also aims to increase sustainable transport use.</p> <p>In addition, the measures included in</p>	<p>No: The policy for Ross-on-Wye provides for the development of around 900 new homes and 10ha of employment land. Some of these, 350 will be located in an urban extension to the south east of the town, which is across the other side of the town centre to the River Wye SAC, and the remainder will be provided through existing commitments, infill development and peripheral town sites. Although the main urban area of Ross-on-Wye lies in between the proposed urban extension and the River Wye SAC, and therefore there is unlikely to be a significant effect from direct physical damage or disturbance during construction, it is possible that there may be adverse effects from all of the development proposed in terms of interruption to hydrological regimes at the site e.g. as a result of increased demand for water abstraction and water treatment. However, DCWW confirmed that there are sufficient water resources to meet the increases in demand from</p>

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				Draft Core Strategy policies OS1-OS3 relating to open space, sport and recreation may help to relieve any increase in pressure on European sites for recreation space, if appropriately implemented.	Herefordshire throughout their operating area and the plan period. DCWW has also confirmed that there is sufficient existing headroom within the STWs serving Kington to meet the planned level of growth without having a significant effect on the River Wye SAC. In addition, sufficient policy safeguards are included within the Core Strategy to avoid or mitigate a likely significant effect from recreation pressure or air pollution (policies LD3, SS4, KG1 itself and OS1-OS3).
RW2 – Land at Hildersley	Housing and infrastructure development Increase in recreation activities Increase in vehicle traffic Increased water abstraction and treatment	Interruption to hydrological regimes Increased air pollution Physical damage from erosion/trampling	Hydrological impacts are most likely to affect the River Wye SAC. The sites most likely to be affected by an increase in recreation activities and/or air pollution in the surrounding area include the Wye Valley Woodlands SAC, the Wye Valley and Forest of Dean Bat Sites SAC and Walmore Common SPA and Ramsar site.	Improved water efficiency measures, metering and addressing leakages in the supply may help to mitigate any additional pressure placed on the water supply as a result of new development. The implementation of Draft Core Strategy policies SD3: Sustainable Water Management and SD4: Water Quality should help to avoid adverse impacts in relation to hydrological regimes at European sites. Water quality in the River Wye SAC is also specifically addressed through the Nutrient Management Plan that Natural England and the Environment Agency have committed to produce, through their signed Statement of Intent (February	No: The policy for the urban extension at Ross-on-Wye provides for the development of around 350 new homes. The main urban area of Ross-on-Wye lies in between the proposed urban extension and the River Wye SAC, and therefore there is unlikely to be a significant effect from direct physical damage or disturbance during construction, it is possible that there may be adverse effects from all of the development proposed in terms of interruption to hydrological regimes at the site e.g. as a result of increased demand for water abstraction and water treatment. . However, DCWW

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				<p>2013).</p> <p>The specific measures within the individual place-shaping policies including RW2 itself relating to sustainable transport and green infrastructure provision should help to avoid adverse impacts relating to increased vehicle traffic and recreation pressure. SS4 also aims to increase sustainable transport use.</p> <p>In addition, the measures included in Draft Core Strategy policies OS1-OS3 relating to open space, sport and recreation may help to relieve any increase in pressure on European sites for recreation space, if appropriately implemented.</p>	<p>confirmed that there are sufficient water resources to meet the increases in demand from Herefordshire throughout their operating area and the plan period. DCWW has also confirmed that there is sufficient existing headroom within the STWs serving Kington to meet the planned level of growth without having a significant effect on the River Wye SAC.</p> <p>In addition, sufficient policy safeguards are included within the Core Strategy to avoid or mitigate a likely significant effect from recreation pressure or air pollution (policies LD3, SS4, KG1 itself and OS1-OS3).</p>
RA1 – Rural Housing strategy	<p>Housing development</p> <p>Development of supporting infrastructure</p> <p>Increased recreation activities</p> <p>Increased vehicle traffic</p>	<p>Physical damage/disturbance</p> <p>Non-physical disturbance such as noise and light pollution</p> <p>Air pollution</p> <p>Interruption to hydrological regimes</p>	<p>Potentially any sites within and close to Herefordshire may be affected, but effects are more likely to be experienced at the River Wye SAC, Wye Valley & Forest of Dean Bat Sites and Wye Valley Woodlands, and Rhos Goch SACs due to their location within the</p>	<p>Draft Core Strategy Policy LD3: Biodiversity and Geodiversity specifically aims help to avoid adverse impacts on European sites from new development, including housing.</p> <p>Good practice construction techniques including noise suppression measures, hours of operation etc. may help to mitigate potential adverse effects during construction. The measures included in policy SD1: Sustainable Design and Energy Efficiency should help to mitigate</p>	<p>No for physical damage, disturbance, air pollution, interruption to water levels: This policy provides for around 5,300 new dwellings to be provided throughout Herefordshire’s rural areas, which could affect European sites both directly as a result of physical disturbance and indirectly throughout noise, vibration, light and air pollution. The general increase in the local population may</p>

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	Increased demand for water abstraction and sewage treatment		County.	<p>potential impacts relating to non-physical disturbance.</p> <p>The measures included in Draft Core Strategy policies OS1-OS3 relating to open space, sport and recreation may help to relieve any increase in pressure on European sites for recreation space, if appropriately implemented.</p> <p>Improved water efficiency measures, metering and addressing leakages in the supply may help to mitigate any additional pressure placed on the water supply as a result of new development. The implementation of Draft Core Strategy policies SD3: Sustainable Water Management and SD4: Water Quality should help to avoid adverse impacts in relation to hydrological regimes at European sites. Water quality in the River Wye SAC is also specifically addressed through the Nutrient Management Plan that Natural England and the Environment Agency have committed to produce, through their signed Statement of Intent (February 2013).</p>	<p>also result in increased vehicle traffic (particularly as the housing development is to be located in rural areas) and increased pressure for recreation space, water abstraction and water treatment. While the policy sets out housing numbers for each of the rural HMAs in Herefordshire, the exact location of the development is unknown at this stage. It is noted, however, that the housing target for the villages in the Hereford HMA is largest (at 18%) which indicates that the most rural growth is likely to occur in the vicinity of the River Wye SAC. Despite this uncertainty, sufficient policy safeguards are included within the Core Strategy to avoid or mitigate a likely significant effect on any European site (policies LD3, SD1, SD3, SD4 and OS1-OS3). DCWW confirmed that there are sufficient water resources to meet the increases in demand from Herefordshire throughout their operating area and the plan period.</p> <p>Yes for water quality impacts on River Wye SAC: The policy allows for the development of at least 5,300 new homes in the rural areas and the resulting increase in demand for water treatment is likely</p>

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					to have a significant effect on the River Wye SAC, as the STWs serving the rural areas do not have sufficient existing headroom available to meet the planned growth within the rural areas.
RA2 – Herefordshire’s Villages	<p>Housing development</p> <p>Increased recreation activities</p> <p>Increased vehicle traffic</p> <p>Increased demand for water abstraction and sewage treatment</p>	<p>Physical damage/disturbance</p> <p>Non-physical disturbance such as noise and light pollution</p> <p>Air pollution</p> <p>Interruption to hydrological regimes</p>	Potentially any sites within and close to Herefordshire may be affected, but effects are more likely to be experienced at the River Wye SAC, Wye Valley & Forest of Dean Bat Sites and Wye Valley Woodlands, and Rhos Goch SACs due to their location within the County.	<p>Draft Core Strategy Policy LD3: Biodiversity and Geodiversity specifically aims help to avoid adverse impacts on European sites from new development, including housing.</p> <p>Good practice construction techniques including noise suppression measures, hours of operation etc. may help to mitigate potential adverse effects during construction. The measures included in policy SD1: Sustainable Design and Energy Efficiency should help to mitigate potential impacts relating to non-physical disturbance.</p> <p>The measures included in Draft Core Strategy policies OS1-OS3 relating to open space, sport and recreation may help to relieve any increase in pressure on European sites for recreation space, if appropriately implemented.</p> <p>Improved water efficiency measures, metering and addressing leakages in the supply may help to mitigate any additional pressure placed on the water supply as a result of new development.</p>	<p>No for physical damage, disturbance, air pollution, interruption to water levels: This policy allows for residential development in Herefordshire’s villages (to help meet the 5,300 homes in rural areas) in certain circumstances, which could affect European sites both directly as a result of physical disturbance and indirectly throughout noise, vibration, light and air pollution. The general increase in the local population may also result in increased vehicle traffic (particularly as the housing development is to be located in rural areas) and increased pressure for recreation space, water abstraction and water treatment. While the policy sets out housing numbers for each of the rural HMAs in Herefordshire, the exact location of the development is unknown at this stage. Despite this uncertainty, sufficient policy safeguards are included within the Core Strategy to</p>

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				<p>The implementation of Draft Core Strategy policies SD3: Sustainable Water Management and SD4: Water Quality should help to avoid adverse impacts in relation to hydrological regimes at European sites. Water quality in the River Wye SAC is also specifically addressed through the Nutrient Management Plan that Natural England and the Environment Agency have committed to produce, through their signed Statement of Intent (February 2013).</p>	<p>avoid or mitigate a likely significant effect on any European site (policies LD3, SD1, SD3, SD4 and OS1-OS3). DCWW confirmed that there are sufficient water resources to meet the increases in demand from Herefordshire throughout their operating area and the plan period.</p> <p>Yes for water quality impacts on River Wye SAC: The policy allows for the development of at least 5,300 new homes in the rural areas and the resulting increase in demand for water treatment is likely to have a significant effect on the River Wye SAC, as the STWs serving the rural areas do not have sufficient existing headroom available to meet the planned growth within the rural areas.</p>
RA3 – Herefordshire’s Countryside	N/A	N/A	N/A	N/A	No: This policy sets out criteria for residential development in rural areas, which is proposed under other Rural Areas policies (see above). Therefore it doesn’t lead directly to development.
RA4 – Agricultural, Forestry and Rural Enterprise	N/A	N/A	N/A	N/A	No: This policy sets out criteria for the development of agricultural, forestry and rural enterprise dwellings in rural areas. Any resulting development would be on a

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Dwellings					very small scale as this policy refers to the development of individual buildings and applies very strict criteria for when and where this would allowed.
RA5 – Re-Use of Rural Buildings	N/A	N/A	N/A	N/A	No: This policy would not lead to new development; rather it relates to criteria for allowing the re-use of existing buildings. In addition, the re-use of existing buildings may help to avoid the need for new constructions, thereby reducing the potential for new development to affect European sites.
RA6 – Rural Economy	<p>Development for economic purposes e.g. employment sites</p> <p>Increase in emissions from employment-related development</p> <p>Increase in vehicle traffic</p> <p>Increase in tourism/recreation activities</p> <p>Increased demand</p>	<p>Physical disturbance/damage</p> <p>Non-physical disturbance such as noise, vibration and light pollution</p> <p>Interruption to hydrological regimes</p> <p>Air pollution</p>	<p>Potentially any sites within and close to Herefordshire may be affected, but effects are more likely to be experienced at the River Wye SAC, Wye Valley & Forest of Dean Bat Sites and Wye Valley Woodlands, and Rhos Goch SACs due to their location within the County.</p>	<p>Draft Core Strategy Policy LD3: Biodiversity and Geodiversity specifically aims help to avoid adverse impacts on European sites from new development, including housing.</p> <p>Good practice construction techniques including noise suppression measures, hours of operation etc. may help to mitigate potential adverse effects during construction. The measures included in policy SD1: Sustainable Design and Energy Efficiency should help to mitigate potential impacts relating to non-physical disturbance.</p> <p>The measures included in Draft Core Strategy policies OS1-OS3 relating to</p>	<p>No for physical damage, disturbance, air pollution, interruption to water levels: This policy may lead to employment/economic development, and depending on the nature, size and precise location of this development, which could affect European sites both directly as a result of physical disturbance and indirectly throughout noise, vibration, light and air pollution. In addition, if the policy were to result in an increase in tourism-related activities, this could lead to increased recreation pressures at European sites, as could a general</p>

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	for water abstraction and treatment			<p>open space, sport and recreation may help to relieve any increase in pressure on European sites for recreation space, if appropriately implemented.</p> <p>Provision of sustainable transport links to and from employment/business sites.</p> <p>Improved water efficiency measures, metering and addressing leakages in the supply may help to mitigate any additional pressure placed on the water supply as a result of new development. The implementation of Draft Core Strategy policies SD3: Sustainable Water Management and SD4: Water Quality should help to avoid adverse impacts in relation to hydrological regimes at European sites. Water quality in the River Wye SAC is also specifically addressed through the Nutrient Management Plan that Natural England and the Environment Agency have committed to produce, through their signed Statement of Intent (February 2013).</p>	<p>increase in population resulting from enhanced economic activities in the county's rural areas. This population growth may also result in increased demand for water abstraction/treatment and an increase in vehicle traffic. However, sufficient policy safeguards are included within the Core Strategy to avoid or mitigate a likely significant effect on any European site (policies LD3, SD1, SD3, SD4 and OS1-OS3). DCWW confirmed that there are sufficient water resources to meet the increases in demand from Herefordshire throughout their operating area and the plan period.</p> <p>Yes for water quality impacts on River Wye SAC: The policy allows for employment development in the rural areas and the resulting increase in demand for water treatment is likely to have a significant effect on the River Wye SAC, as the STWs serving the rural areas do not have sufficient existing headroom available to meet the planned growth within the rural areas.</p>
H1 – Affordable Housing	N/A	N/A	N/A	N/A	No: The policy would not itself lead to development; instead it relates to criteria for development i.e. the

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					proportion of affordable homes to be provided within overall housing development, the effects of which are assessed separately under other policies.
H2 - Rural Exception Sites	<p>Housing development</p> <p>Increased recreation activities</p> <p>Increased vehicle traffic</p>	<p>Physical disturbance/damage</p> <p>Erosion/trampling</p> <p>Non-physical disturbance such as noise, vibration and light pollution</p> <p>Air pollution</p>	Uncertain at this stage, potentially any sites in and immediately around the County could be affected, depending on the location of rural exception sites.	<p>Draft Core Strategy Policy LD3: Biodiversity and Geodiversity specifically aims help to avoid adverse impacts on European sites from new development, including housing.</p> <p>Good practice construction techniques including noise suppression measures, hours of operation etc. may help to mitigate potential adverse effects during construction. The measures included in policy SD1: Sustainable Design and Energy Efficiency should help to mitigate potential impacts relating to non-physical disturbance.</p> <p>The measures included in Draft Core Strategy policies OS1-OS3 relating to open space, sport and recreation may help to relieve any increase in pressure on European sites for recreation space, if appropriately implemented.</p> <p>Improved water efficiency measures, metering and addressing leakages in the supply may help to mitigate any additional pressure placed on the water supply as a result of new development. The implementation of Draft Core</p>	No: The policy allows for small affordable housing schemes in rural areas on land which would not normally be released for housing in certain circumstances, and depending on the nature, size and precise location of this development, which could affect European sites both directly as a result of physical disturbance and indirectly throughout noise, vibration, light and air pollution. In addition, if the policy were to result in an increase in recreation activities, this could lead to increased recreation pressures at European sites. There may also be localised increases demand for water abstraction/treatment and an increase in vehicle traffic. However, the scale and extent of such development is not likely to be significant, and sufficient policy safeguards are included within the Core Strategy to avoid or mitigate a likely significant effect on any European site (policies LD3, SD1,

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				Strategy policies SD3: Sustainable Water Management and SD4: Water Quality should help to avoid adverse impacts in relation to hydrological regimes at European sites. Water quality in the River Wye SAC is also specifically addressed through the Nutrient Management Plan that Natural England and the Environment Agency have committed to produce, through their signed Statement of Intent (February 2013).	SD3, SD4 and OS1-OS3). DCWW confirmed that there are sufficient water resources to meet the increases in demand from Herefordshire throughout their operating area and the plan period. A number of these developments may deal with their waste water via non-mains drainage, and planning applications including non-mains drainage are subject to distance and volume screening criteria by Herefordshire Council (agreed with NE) to ensure no likely significant effect on the River Wye SAC.
H3 – Ensuring a Range and Mix of Housing Types	N/A	N/A	N/A	N/A	No: The policy would not itself lead to development; instead it relates to criteria for development i.e. the range and mix of housing types and sizes to be provided within overall housing development, the effects of which are assessed under other policies.
H4 - Traveller Sites	Infrastructure development Increased recreation activities	Physical disturbance/damage Erosion/trampling Non-physical disturbance such as noise, vibration and light pollution	Potentially any sites within the county may be affected, but more likely to be River Wye SAC, Wye Valley & Forest of Dean Bat Sites and Wye Valley Woodlands, and Rhos	One of the criteria stipulated within the proposal itself should help to mitigate any increase in pressure for recreation space, as it specifies that sufficient on-site play areas should be provided. The measures included in the policies relating to open space, sport and recreation (OS1-OS3) may help to	No: The scale and extent of such development is not likely to be significant, and sufficient policy safeguards are included within the Core Strategy to avoid or mitigate a likely significant effect on any European site (policies LD3, SD1 and OS1-OS3, and policy H4 itself).

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		Air pollution	Goch SACs due to their closer proximity to Hereford, the Market Towns, Rural Service Centres and Hubs, and local centres, (gypsy and traveller sites are considered more likely to be allowed within close proximity of these towns and villages as the policy requires them to afford reasonable access to services and facilities).	relieve any increase in pressure on European sites for recreation space, if appropriately implemented. Good practice construction techniques including noise suppression measures, hours of operation etc. may help to mitigate potential adverse effects during construction. The measures included in policy SD1: Sustainable Design and Energy Efficiency should help to mitigate potential impacts relating to non-physical disturbance.	
SC1 – Social and Community Facilities	Development of social and community facilities and infrastructure	Physical disturbance/damage Non-physical disturbance such as noise, vibration and light pollution	Potentially any sites within the county may be affected, although the River Wye SAC, Wye Valley & Forest of Dean Bat Sites and Wye Valley Woodlands SACs are particularly likely to be affected due to their proximity to Hereford and the market towns where most development is expected to occur.	Good practice construction techniques including noise suppression measures, hours of operation etc. may help to mitigate potential adverse effects during construction. The measures included in policy SD1: Sustainable Design and Energy Efficiency should help to mitigate potential impacts relating to non-physical disturbance.	No: The scale and extent of such development is not likely to be significant, and sufficient policy safeguards are included within the Core Strategy to avoid or mitigate a likely significant effect on any European site (policies LD3, SD1 and OS1-OS3).
OS1 – Requirement for	N/A	N/A	N/A	This policy may itself help to mitigate the potential impacts of other Core	No: The policy aims to enhance open space within Herefordshire, which

Draft Herefordshire Core Strategy Policy	Likely activities (operations) to result as a consequence of the policy	Likely effects if policy implemented	European site(s) potentially affected	Potential mitigation measures – if implemented would avoid likely significant effect	Could the policy have likely significant effects on European sites (taking mitigation into account)?
Open Space, Sports and Recreation Facilities				Strategy policies on European sites as a result of increased pressure for recreation space.	could potentially benefit biodiversity, including at European sites. This may help to mitigate the potential adverse impacts of other Core Strategy policies in relation to increased pressure for recreation space.
OS2 – Meeting Open Space, Sports and Recreation Needs	Development of new sport and recreation facilities	Physical disturbance/damage Non-physical disturbance such as noise, vibration and light pollution	Potentially any sites within the county may be affected, but more likely to be River Wye SAC, Wye Valley & Forest of Dean Bat Sites and Wye Valley Woodlands SACs due to their proximity to Hereford and the Market Towns, which are where the provision of sports and recreation facilities is likely to be focused.	Good practice construction techniques including noise suppression measures, hours of operation etc. may help to mitigate potential adverse effects during construction. The measures included in policy SD1: Sustainable Design and Energy Efficiency should help to mitigate potential impacts relating to non-physical disturbance. The part of this policy relating to the provision of open space may help to mitigate the potential impacts of other Core Strategy policies on European sites as a result of increased pressure for recreation space.	No: The scale and extent of such development is not likely to be significant, and sufficient policy safeguards are included within the Core Strategy to avoid or mitigate a likely significant effect on any European site (policies LD3, SD1 and OS1-OS3).
OS3 – Loss of Open Space, Sports or Recreation Facilities	N/A	N/A	N/A	N/A	No: The proposal itself will not lead to new development.
MT1 - Traffic Management,	Development of transport	Physical	Potentially any European sites in and	Good practice construction techniques including noise suppression measures,	No: This policy could result in the development of transport

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Highway Safety and Promoting Active Travel	infrastructure.	disturbance/damage Non-physical disturbance such as noise, vibration and light pollution	around the County could be affected depending on the location of transport infrastructure to be provided, but more likely to be River Wye SAC, Wye Valley & Forest of Dean Bat Sites and Wye Valley Woodlands SACs due to their proximity to Hereford and the Market Towns, which are where a large proportion of the resulting development is likely to be focused.	hours of operation etc. may help to mitigate potential adverse effects during construction. The measures included in policy SD1: Sustainable Design and Energy Efficiency should help to mitigate potential impacts relating to non-physical disturbance. The measures in this policy to promote sustainable transport provision and use could help to mitigate the potential adverse impacts of other Core Strategy policies in relation to increased vehicle traffic and the resulting noise and air pollution.	infrastructure, which could have adverse effects on European sites (e.g. as a result of physical damage or non-physical disturbance) depending on its location. However, sufficient policy safeguards are included within the Core Strategy to avoid or mitigate a likely significant effect on any European site (policies LD3, SD1 and MT1 itself).
E1 – Employment Provision	Increase in recreation pressure Increase in vehicle traffic Increased water abstraction and treatment Increase in emissions from development	Physical disturbance/damage Air pollution Interruption to hydrological regimes	Potentially any sites within the county may be affected, but more likely to be River Wye SAC, Wye Valley & Forest of Dean Bat Sites and Wye Valley Woodlands SACs due to their proximity to Hereford and the Market Towns, which are where a large proportion of employment	The measures included in the policies relating to open space, sport and recreation (OS1-OS3) may help to relieve any increase in pressure on European sites for recreation space, if appropriately implemented. Improved water efficiency measures, metering and addressing leakages in the supply may help to mitigate any additional pressure placed on the water supply as a result of new development. The implementation of Draft Core Strategy policies SD3: Sustainable Water Management and SD4: Water Quality	Uncertain: The policy seeks to focus larger-scale employment development within urban areas, therefore is generally likely to direct this type of development away from sensitive European sites. However, an increase in economic activities within the County in general is likely to result in an increase in vehicle movements (including near to sensitive sites) and a general increase in population as employment opportunities become more readily available, bringing with

Draft Herefordshire Core Strategy Policy	Likely activities (operations) to result as a consequence of the policy	Likely effects if policy implemented	European site(s) potentially affected	Potential mitigation measures – if implemented would avoid likely significant effect	Could the policy have likely significant effects on European sites (taking mitigation into account)?
			development is likely to be focused.	<p>should help to avoid adverse impacts in relation to hydrological regimes at European sites. Water quality in the River Wye SAC is also specifically addressed through the Nutrient Management Plan that Natural England and the Environment Agency have committed to produce, through their signed Statement of Intent (February 2013).</p> <p>Good practice construction techniques including noise suppression measures, hours of operation etc. may help to mitigate potential adverse effects during construction. The measures included in policy SD1: Sustainable Design and Energy Efficiency should help to mitigate potential impacts relating to non-physical disturbance.</p>	it associated pressures e.g. for recreation space and for water supply and treatment, and a further increase in vehicle movements. However, sufficient policy safeguards are included within the Core Strategy to avoid or mitigate a likely significant effect on any European site (policies LD3, SD1, SD3, SD4).
E2 – Redevelopment of Employment Land	N/A	N/A	N/A	N/A	No: This policy will not itself result in new development; rather it relates to safeguarding existing employment land.
E3 – Home Working	N/A	N/A	N/A	This policy may help to mitigate the potential impacts of other Core Strategy policies in relation to increased vehicle traffic, by reducing the extent to which people need to travel for work.	No: This policy will not relate to new development, rather it relates to the change of use of parts of existing residential properties in order to allow for home working. This may have positive effects on reducing vehicle traffic in Herefordshire and the associated potential impacts on

Draft Herefordshire Core Strategy Policy	Likely activities (operations) to result as a consequence of the policy	Likely effects if policy implemented	European site(s) potentially affected	Potential mitigation measures – if implemented would avoid likely significant effect	Could the policy have likely significant effects on European sites (taking mitigation into account)?
					European sites.
E.4 - Tourism	<p>Increase in recreation pressure</p> <p>Increase in vehicle traffic</p> <p>Increased water abstraction and demand for water treatment</p>	<p>Physical disturbance/damage</p> <p>Air pollution</p> <p>Interruption to hydrological regimes</p>	<p>Potentially any sites within the county may be affected, but more likely to be River Wye SAC, Wye Valley & Forest of Dean Bat Sites and Wye Valley Woodlands SACs due to their proximity to Hereford and the Market Towns, which are where a large proportion of the resulting development is likely to be focused.</p>	<p>The measures included in the policies relating to open space, sport and recreation (OS1-OS3) may help to relieve any increase in pressure on European sites for recreation space, if appropriately implemented.</p> <p>Improved water efficiency measures, metering and addressing leakages in the supply may help to mitigate any additional pressure placed on the water supply as a result of new development. The implementation of Draft Core Strategy policies SD3: Sustainable Water Management and SD4: Water Quality should help to avoid adverse impacts in relation to hydrological regimes at European sites. Water quality in the River Wye SAC is also specifically addressed through the Nutrient Management Plan that Natural England and the Environment Agency have committed to produce, through their signed Statement of Intent (February 2013).</p> <p>Good practice construction techniques including noise suppression measures, hours of operation etc. may help to mitigate potential adverse effects during construction. The measures included in policy SD1: Sustainable Design and</p>	<p>No – the policy emphasises the importance of environmental protection. While an increase in tourism activities in Herefordshire could lead to an increase in visitor pressure at sensitive European sites, sufficient policy safeguards are included within the Core Strategy to avoid or mitigate a likely significant effect on any European site (policies LD3, SD1, SD3, SD4). In addition, DCWW confirmed that there are sufficient water resources to meet the increases in demand from Herefordshire throughout their operating area and the plan period.</p>

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				Energy Efficiency should help to mitigate potential impacts relating to non-physical disturbance.	
E.5 – Town Centres	<p>N/A for most town centres.</p> <p>For Ross-on-Wye: Retail, commercial, leisure, cultural and tourism development. Increase in recreation activities Increase in vehicle traffic Increased water abstraction and treatment</p>	<p>N/A for most town centres.</p> <p>For Ross-on-Wye: Non-physical disturbance during construction. Interruption to hydrological regimes Increased air pollution Physical damage from erosion/trampling</p>	<p>N/A for most town centres.</p> <p>For Ross-on-Wye: River Wye SAC</p>	<p>N/A for most town centres.</p> <p>For Ross-on-Wye: Improved water efficiency measures, metering and addressing leakages in the supply may help to mitigate any additional pressure placed on the water supply as a result of new development. The implementation of Draft Core Strategy policies SD3: Sustainable Water Management and SD4: Water Quality should help to avoid adverse impacts in relation to hydrological regimes at European sites. Water quality in the River Wye SAC is also specifically addressed through the Nutrient Management Plan that Natural England and the Environment Agency have committed to produce, through their signed Statement of Intent (February 2013).</p> <p>The specific measures within the individual place-shaping policies including RW1 relating to sustainable transport and green infrastructure provision should help to avoid adverse impacts relating to increased vehicle traffic and recreation pressure. SS4 also aims to increase sustainable transport use.</p>	<p>No: This policy aims to focus retail, commercial, leisure, cultural and tourism development within existing town centres; which are generally distant from sensitive European sites. In addition, the policy states that the use of upper floors within town centres for residential and office uses will be supported, which means that less greenfield land will be used (so reducing likelihood of impacts from physical loss/damage) and also that construction of new development within the town centre is not likely to be at a scale that would have a significant effect.</p> <p>Any potential effects that might arise from development within Ross-on-Wye town centre on the River Wye SAC will be sufficiently mitigated by policies LD3, SD1, SD3, SD4. SS4, RW1 and OS1-OS3.</p>

Draft Herefordshire Core Strategy Policy	Likely activities (operations) to result as a consequence of the policy	Likely effects if policy implemented	European site(s) potentially affected	Potential mitigation measures – if implemented would avoid likely significant effect	Could the policy have likely significant effects on European sites (taking mitigation into account)?
				In addition, the measures included in Draft Core Strategy policies OS1-OS3 relating to open space, sport and recreation may help to relieve any increase in pressure on European sites for recreation space, if appropriately implemented.	
E.6 - Primary and Secondary Shopping Frontages	N/A	N/A	N/A	N/A	No: This policy will not lead to new development; rather it relates to the use of existing retail developments.
LD1 – Local Distinctiveness	N/A	N/A	N/A	N/A	No: This policy will not lead to new development; rather it aims to ensure that development proposed under other policies will conserve and enhance Herefordshire’s local distinctiveness. It also states that biodiversity considerations have helped, and will continue to help, to shape strategic locations and future development proposals.
LD2 – Landscape and Streetscape	N/A	N/A	N/A	N/A	No: This policy will not lead to new development; rather it aims to ensure that development proposed under other policies will conserve and enhance Herefordshire’s landscape.
LD3 – Biodiversity and	N/A	N/A	N/A	The measures in this proposal to conserve and enhance biodiversity at	No: This policy will not lead to new development; rather it specifically

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Geodiversity				European designated sites should help to provide mitigation against the potential adverse impacts of other Core Strategy policies.	aims to ensure that development proposed under other policies will conserve, restore and enhance local biodiversity, with specific reference to habitats, networks and species of European importance. As such, this policy could help to provide mitigation against the potential impacts of other Core Strategy policies.
LD4 Green Infrastructure	N/A	N/A	N/A	The measures in this proposal to provide for green infrastructure within new developments should help to provide mitigation against the potential adverse impacts of other Core Strategy policies in relation to increased pressure for recreation space.	No: This policy will not lead to new development; rather it encourages new development to provide for new green infrastructure. This could benefit biodiversity, including that at and connected with European sites, by increasing habitat connectivity and reducing fragmentation.
LD5- Historic Environment and Heritage Assets	N/A	N/A	N/A	N/A	No: This policy will not lead to new development; rather it aims to ensure that development proposed under other policies will conserve and enhance local heritage assets,
SD1 – Sustainable Design and Energy Efficiency	N/A	N/A	N/A	This policy should help to mitigate potential adverse effects of future development on designated sites, by ensuring that development is undertaken as sustainably as possible.	No: The proposal will not itself lead to development, instead it relates to criteria for development. In addition, the proposal includes measures aiming to protect the environment, e.g. reducing pollution, which could benefit biodiversity including that at

Draft Herefordshire Core Strategy Policy	Likely activities (operations) to result as a consequence of the policy	Likely effects if policy implemented	European site(s) potentially affected	Potential mitigation measures – if implemented would avoid likely significant effect	Could the policy have likely significant effects on European sites (taking mitigation into account)?
					and connected with European sites.
SD2 – Renewable Energy	Development of renewable energy infrastructure	Physical damage/disturbance	Potentially any sites within the county may be affected, but more likely to be River Wye SAC, Wye Valley & Forest of Dean Bat Sites and Wye Valley Woodlands SACs due to their proximity to Hereford and the Market Towns, which are where a large proportion of development is likely to be focused.	<p>Good practice construction techniques including noise suppression measures, hours of operation etc. may help to mitigate potential adverse effects during construction. The measures included in policy SD1: Sustainable Design and Energy Efficiency should help to mitigate potential impacts relating to non-physical disturbance.</p> <p>The policy itself states that proposals for renewable energy development must not adversely impact upon the objectives of international designations for the conservation of the natural environment (which includes European sites).</p>	No: This policy could result in the development of renewable energy infrastructure which could potentially affect European sites, depending in its location. However, sufficient policy safeguards are included within the Core Strategy to avoid or mitigate a likely significant effect on any European site (policies LD3, SD1 and the policy itself).
SD3 - Sustainable Water Management	N/A	N/A	N/A	This policy should help to mitigate potential adverse effects of future development from other Core Strategy policies on designated sites in relation to increased demand for water abstraction and sewage treatment.	No: The policy will not itself lead to development, instead it relates to criteria for development. In addition, the proposal specifically aims to ensure that new development does not have an adverse impact on the water environment which should benefit European sites that are dependent on water quality/quantity. The policy makes specific reference to the potential biodiversity benefits of conserving and enhancing the water environment.

Draft Herefordshire Core Strategy Policy	Likely activities (operations) to result as a consequence of the policy	Likely effects if policy implemented	European site(s) potentially affected	Potential mitigation measures – if implemented would avoid likely significant effect	Could the policy have likely significant effects on European sites (taking mitigation into account)?
SD4 – Wastewater Treatment and River Water Quality	N/A	N/A	N/A	This policy should help to mitigate potential adverse effects of future development from other Core Strategy policies on designated sites in relation to water quality.	No: The policy will not itself lead to development, instead it relates to criteria for development. In addition, the proposal specifically aims to ensure that new development does not have an adverse impact on water quality which should benefit European sites that are dependent on water quality. The policy makes specific reference to the need to protect SACs from deterioration in water quality and requires proposals for non-mains connected development to demonstrate that there will be no adverse impacts on the River Wye or River Clun SACs.
MN1 - Minerals Safeguarding Areas	N/A	N/A	N/A	N/A	No: The proposal itself would not lead to development; rather it aims to restrict development in areas where this could lead to the sterilisation of minerals resources.
MN2 - Annual Apportionments	N/A	N/A	N/A	N/A	No: The proposal will not itself lead to development.
MN3 - Criteria for the Assessment of Minerals Related Development	N/A	N/A	N/A	This policy should help to mitigate potential adverse effects from minerals development on European sites.	No: The proposal will not lead to development; rather it sets out criteria for the assessment of minerals-related development, and includes specific criteria aiming to protect biodiversity, especially at the River Wye SAC, from the potential

Draft Herefordshire Core Strategy Policy	Likely activities (operations) to result as a consequence of the policy	Likely effects if policy implemented	European site(s) potentially affected	Potential mitigation measures – if implemented would avoid likely significant effect	Could the policy have likely significant effects on European sites (taking mitigation into account)?
					impacts of minerals developments.
MN4 - Small-Scale Non-Aggregate Building Stone and Clay Production	N/A	N/A	N/A	N/A	No: The proposal will not itself lead to development; rather it sets out criteria for small-scale non-aggregate building stone and clay production. It includes specific reference to the potential to restore extraction sites for biodiversity benefits.
MN5 - Secondary (Re-Used and Recycled) Aggregates	N/A	N/A	N/A	N/A	No: The proposal will not itself lead to development; rather it sets out criteria for secondary aggregate production. It includes specific reference to the protection of the River Wye SAC from the potential impacts of proposals for the production, import, processing, treatment and storage of secondary aggregates,
MN 6 – Moreton on Lugg Railhead	N/A	N/A	N/A	N/A	No: The proposal will not itself lead to development; rather it relates to the continued use of this existing railhead.
W1 – Waste Streams and Targets	Development of waste management facilities Increase in emissions from	Physical disturbance/damage Non-physical disturbance such as noise, vibration and	Potentially any sites within the county may be affected, but more likely to be River Wye SAC, Wye Valley & Forest of Dean Bat	Good practice construction techniques including noise suppression measures, hours of operation etc. may help to mitigate potential adverse effects during construction. The measures included in policy SD1: Sustainable Design and	No: The policy may lead to the construction of new waste management facilities, particularly in and around Hereford and the Market towns, although the likely impacts of this are unknown without precise

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	waste facilities	light pollution Air pollution	Sites and Wye Valley Woodlands SACs due to their proximity to Hereford and the Market Towns, which are where the provision of waste management facilities is likely to be focused.	Energy Efficiency should help to mitigate potential impacts relating to non-physical disturbance.	information about the type, scale and location of such facilities, which would only be available as planning applications come forward. The development of new waste facilities may result in localised air pollution if the facilities incorporate thermal treatment. However, sufficient policy safeguards are included within the Core Strategy to avoid or mitigate a likely significant effect on any European site (policies LD3 and SD1).
W2 - Location of New Waste Facilities	N/A	N/A	N/A	This policy should help to mitigate potential effects from waste development on designated sites.	No: The proposal will not itself lead to development; in addition it includes measures aiming to protect the natural environment.
W3 - Existing and Permitted Waste Treatment Sites	N/A	N/A	N/A	N/A	No: The proposal will not itself lead to development; rather it relates to the retention of existing waste management sites.
W4- Anaerobic Digesters	N/A	N/A	N/A	N/A	No: The proposal will not itself lead to development; rather it encourages the use of anaerobic digesters for both large and small-scale waste management proposals.
W5 – Waste Minimisation and	N/A	N/A	N/A	N/A	No: The proposal will not itself lead to development; rather it aims to ensure that development proposed

Draft Herefordshire Core Strategy Policy	Likely activities (operations) to result as a consequence of the policy	Likely effects if policy implemented	European site(s) potentially affected	Potential mitigation measures – if implemented would avoid likely significant effect	Could the policy have likely significant effects on European sites (taking mitigation into account)?
Management in New Developments					under other Core Strategy policies will minimise and effectively manage waste generation.
ID.1 – Infrastructure Delivery	N/A	N/A	N/A	N/A	No: The policy will not itself lead to development, instead it relates to criteria for how development will be funded, where the development would be required as a result of other policies.

Appendix 2

Review of neighbouring plans for potential in-combination effects

Neighbouring Local Plans

Forest of Dean Core Strategy: Adopted Version (2012)

Note that there is a pending legal challenge to both the Core Strategy and the Cinderford Northern Quarter Area Action Plan which is due to be heard in May 2013. The outcome of the challenge may result in changes to the Core Strategy and the Area Action Plan but until such time both documents remain as adopted parts of the Development Plan.

Forest of Dean District lies to the south east of Herefordshire.

Housing: The Core Strategy sets out housing allocations for the settlements within the Forest of Dean up to 2026 as follows:

- Cinderford and Ruspidge Urban Area – around 1,050 new homes
- Lydney – around 1,900 new homes
- Coleford (includes Milkwall, Coalway, Mile End, Berry Hill) – around 650 new homes
- Newent - around 350 new homes
- Tutshill and Sedbury – around 111 new homes
- Bream – around 100 new homes
- Drybrook – around 100 new homes
- Mitcheldean – around 101 new homes
- Newnham – around 65 new homes
- Whitecroft-Pillowell-Yorkley – around 45 new homes
- Lydbrook-Joys Green – around 82 new homes
- Other villages and rural – around 608 new homes

Priority will be given to development on previously developed land and on sites identified for housing in the development plan. No new greenfield sites will be released unless it can be proven that land is not available from other sources and is needed to meet the plan's requirements.

Employment: The Core Strategy sets out employment land allocations for the settlements within the Forest of Dean as follows:

- Cinderford – around 26ha
- Lydney – around 30ha
- Coleford – around 6.8ha
- Newent – around 5ha
- Villages – intensification, redevelopment and diversification will be supported on sites that are well linked to settlements and services.

HRA Findings: HRA for the adopted Core Strategy was undertaken and is reported in Appendix 10 of the SA Report for the Adopted Core Strategy (February 2012). **The HRA screening concluded that the Core Strategy will not result in any significant negative impacts on identified sites**, although there will be a need for HRA Screening, with the possibility of an Appropriate Assessment requirements, at later stages of the planning processes, when development proposals are more detailed. The HRA considered the potential for in-combination effects to arise from the Forest of Dean Core Strategy along with other plans and strategies, and there were three plans where the potential impacts were uncertain (West of England Joint Waste Strategy, Shoreline Management Plan and a New Nuclear power station at Oldbury). In these cases it was concluded that there was insufficient detail at this stage to assess, with any degree of accuracy, the potential impacts and that proposals will need to assess their in-combination effects with the Core Strategy at their appropriate decision making stages.

South Worcestershire Development Plan: Proposed Submission Document (January 2013)

Malvern Hills District lies to the east of Herefordshire. The Development Plan DPD has been prepared jointly with the two other South Worcestershire authorities, Worcester City and Wychavon.

Housing: The Development Plan DPD makes provision for 23,200 dwellings (net) during the plan period, to be distributed as follows:

- Malvern Hills (excluding the Wider Worcester Area) – 4,900
- Wychavon (excluding the Wider Worcester Area) – 8,900
- Wider Worcester Area – 9,400

Employment: The Core Strategy makes provision for about 280ha of employment land during the plan period, to be distributed as follows:

- Malvern Hills (excluding the Wider Worcester Area) – 40ha
- Wychavon (excluding the Wider Worcester Area) – 120ha
- Wider Worcester Area – 120ha

HRA Findings: The HRA (Appropriate Assessment) Report for the South Worcestershire Development Plan Pre-Submission Consultation (November 2012) sets out the findings of both the screening and Appropriate Assessment stages of the HRA. The screening assessment concluded that there was uncertainty with regard to the potential for significant effects on Bredon Hill SAC and Lyppard Grange SAC as a result of increased disturbance, in particular from increased recreational activity. The screening assessment also identified uncertainty with regard to the potential for significant in-combination effects on seven European sites as a result of changes water levels and five European sites as a result of changes to water quality. Based on the precautionary approach these issues were progressed through to the AA stage to be considered in more detail. The AA considered the potential for the SWDP to have adverse effects on the integrity of identified European sites through increased disturbance (recreational activity) and reduced water levels and quality. It concluded that the likelihood of proposed development increasing the number of people using Lyppard Grange Ponds SAC is minimal - especially given the much larger areas of open space available for recreation within approximately 300 meters of the site. It therefore concluded that the SWDP will not have adverse effects on the integrity of the Lyppard Grange Ponds SAC through increased disturbance. Considering the location and size of proposed development in relation to Bredon Hill SAC and that recreational activity is not an issue at the site, the AA also concluded that the SWDP will not have adverse effects on the integrity of the SAC either alone or in combination through increased disturbance.

The AA found that the mitigation provided by Pre-Submission policies and current regulatory processes (EA Review of Consents) would ensure that the potential impacts of proposed development on the water environment would be minimised. **It was concluded that the SWDP will not have adverse in combination effects on the integrity of the identified European sites through reduced water levels or water quality.**

Shropshire Core Strategy: Adopted Version (2011)

Shropshire lies to the north of Herefordshire.

Housing: The Core Strategy sets out how housing development within the county will be phased as follows:

- 2006-2011 - 1,190 dwellings per annum
- 2011-2016 - 1,390 dwellings per annum
- 2016-2021 - 1,390 dwellings per annum
- 2021-2026 - 1,530 dwellings per annum

Overall, around 27,500 new homes will be delivered up to 2026, and they will be distributed as follows:

- Central Shropshire - 8,250–8,800 dwellings.
- North West Shropshire - 5,775–6,325 dwellings.
- North East Shropshire - 5,500–6,050 dwellings.
- South Shropshire - 3,575–4,125 dwellings.
- East Shropshire - 3,025–3,575 dwellings together with additional housing provision of up to 1,000 dwellings, if required, for returning military personnel.

Employment: The Core Strategy states that up to 290 hectares of employment land will be provided in Shropshire up to 2026, to be distributed as follows.

- Central Shropshire - 95-105 hectares employment land, of which 85 – 95 hectares will be in Shrewsbury.
- North West Shropshire - 55-65ha.
- North East Shropshire - 50-60ha.
- South Shropshire - 35-45ha.
- East Shropshire - 30-40ha.

HRA Findings: The February 2010 Stage 2 Habitats Regulations Assessment Report for the Shropshire Core Strategy **found that the Core Strategy was not likely to have a significant effect on any of the European sites in the county, provided that adequate HRA work is carried out in relation to the Site Allocations and Management of Development DPD.** A number of the Core Strategy policies propose development which has the potential to affect European sites; however the precise location will be determined through the Site Allocations DPD, therefore it was considered to be more appropriate to carry out the full Appropriate Assessment in relation to this development through the HRA of the Site Allocations DPD.

Now that the Core Strategy has been adopted, the Site Allocations and Management of Development (SAMDev) Plan is being progressed and a Stage 3 Habitats Regulations Assessment Report (January 2013) has now been produced in relation to the Draft Consultation Document. That HRA Report has concluded that while six of the SAMDev Draft Development Management Policies could be screened out of the HRA process and do not require further consideration in lower tier plans, 10 of the SAMDev Draft Development Management Policies have been identified as Code C (meaning that they are elements of the plan/options that could or would be likely to have a significant effect alone and will require the plan to be subject to an Appropriate Assessment before the plan may be adopted). However, all 10 policies meet the three criteria for the HRA decision to be passed down to lower tier document. **The HRA of the Site Allocation and Management of Development Local Plan Document known as SAMDev Draft Development Management Policies therefore showed no likely significant effects on any European Sites** provided that HRA decisions for 10 of the draft policies are passed down to the next tier of the plan-making process or in some cases to planning application stage.

Monmouthshire Local Development Plan: Draft Deposit LDP (June 2011) incorporating Focussed Changes (November 2012)

Monmouthshire lies to the south west of Herefordshire.

Housing: The Draft Deposit LDP (incorporating Focussed Changes) sets out the spatial approach that is being taken to housing provision in Monmouthshire, with the main focus for new housing development being within or adjoining the Main Towns of Abergavenny, Chepstow and Monmouth. A smaller amount of new housing development is provided in the Severnside sub-region, particularly at Magor/Undy and Caldicot/Portskewett. A small amount of new housing development is directed to the Rural Secondary Settlements of Usk, Raglan and Penperlleni. Provision will be made to meet a need for around 4,000 residential units in the plan period 2011-2021, to be distributed as follows:

- Abergavenny – 506 new homes
- Chepstow – 512 new homes
- Monmouth – 755 new homes
- Caldicot – 224 new homes
- Portskewett – 283 new homes
- Magor/Undy – 362 new homes
- Caerwent – 151 new homes
- Rogiet – 53 new homes
- Sudbrook – 53 new homes
- Usk – 52 new homes
- Raglan – 71 new homes
- Penperlleni – 105 new homes
- Llanfoist – 147 new homes

Five strategic housing sites are identified at Abergavenny (Deri Road, Mardy), Caldicot/Portskewett (Crick Road, Portskewett), Chepstow (Land at Fairfield Mabey, Chepstow), Monmouth (Land at Wonastow Road, Monmouth) and Magor/Undy (Rockfield Farm, Undy).

Employment: The Draft Deposit LDP makes provision for employment land including:

- 37ha at Magor suitable for employment development of regional or sub regional significance.
- Around 5-6ha at each of the Main Towns of Abergavenny (Llanfoist), Chepstow and Monmouth.

HRA Findings: The October 2012 HRA Report for the LDP describes the screening and Appropriate Assessment work that was undertaken. The screening assessment concluded that the Deposit LDP (including site allocations) would not have likely significant effects alone on European sites, if the recommended policy safeguards are incorporated into the Plan. These changes were incorporated into the LDP and the SA and HRA Changes Log recognised this and reached a final conclusion of no likely significant effects on European sites.

The screening work identified four main areas of impact arising that may have the potential for significant in combination effects on the integrity of the identified European sites: water resources, water quality, disturbance (including habitat loss and fragmentation) and air quality. These issues were taken forward into the AA and considered in further detail. The AA assessed that there is uncertainty with regard to the potential adverse impacts of the LDP acting in combination with surrounding plans and projects. To address this uncertainty the AA proposed a number of mitigation measures, including recommendations to strengthen the mitigation provided by certain LDP policies. **The AA concluded that the LDP will not have adverse effects on the integrity of European sites as the recommended mitigation measures have been incorporated into the Plan.**

Powys Local Development Plan 2011-2026: Preferred Strategy (March 2012)

Powys lies to the west of Herefordshire.

Housing: The Preferred Strategy sets out a preferred option for housing growth which would see the development of 7,700 new homes over the Plan period, to be phased as follows:

- 2011-2016 – 1,925 new homes
- 2016-2021 – 2,849 new homes
- 2021-2026 – 2,926 new homes

Employment: The preferred option for employment land provision is for the provision of 42ha of land over the Plan period, which equates to 2.8ha per annum.

The preferred spatial option for the distribution of new development in Powys is a settlement hierarchy based on levels of service provision and size of settlement (population) subject to environmental and infrastructure capacity. Higher levels of growth should be directed to those settlements along a central growth corridor in accordance with the Settlement Hierarchy.

HRA Findings: The Draft HRA Report for the Pre-Deposit Proposals (March 2012) took a precautionary approach and highlighted the potential for Powys' LDP to adversely affect the integrity of 28 European Sites, either alone or in-combination with other plans or projects. However, due to the early stage of the Plan, these effects were uncertain in all cases. The screening process also highlighted the potential for in-combination effects with other plans, including from Herefordshire's Core Strategy in relation to pollution from adjacent road drains/houses/chemicals, development (engineering/contamination) and recreation and leisure. In order to ensure that Powys' LDP does not have a significant negative effect, detailed policies need to be developed to mitigate the 'in-combination' effect of development on the identified sites. The deposit proposals will be assessed and if necessary AA will be undertaken to inform the deposit plan.