

**HEREFORDSHIRE CORE
STRATEGY
PREFERRED OPTIONS
CONSULTATION**

**DRAFT HABITATS REGULATIONS
ASSESSMENT REPORT**

**Prepared for
Herefordshire County Council**

**by
Land Use Consultants**

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14 Great George Street
Bristol BS1 5RH
Tel: 0117 929 1997
Fax: 0117 929 1998
bristol@landuse.co.uk

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I INTRODUCTION

- I.1 Herefordshire County 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. The Core Strategy will form part of the Local Development Framework (LDF), along with a number of other documents including the Herefordshire Area Plan (HAP).
- I.2 Land Use Consultants (LUC) has been appointed by Herefordshire County Council to undertake Habitats Regulations Assessment (HRA) of both the Herefordshire Core Strategy and the Hereford Area Plan DPDs. This report relates to the HRA of the Preferred Options version of the Core Strategy, and the HRA of the Hereford Area Plan will be carried out and reported on separately.
- I.3 Herefordshire County 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)
- I.4 Preferred Options for the policies and spatial options within the Core Strategy have now been produced by the Council. These Preferred Options were prepared in three stages, and subject to targeted consultations during summer 2010. Each batch of policies was subject to HRA, 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 made available to Herefordshire Council internally. This full updated HRA report now presents the findings of the HRA of all of the Preferred Options for the Herefordshire 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

I.5 In the case of Leominster, a Preferred Option for development in the town was established at the Place Shaping Paper stage, whereas for the other spatial policies a number of options still remained at this stage. However this did not set out the level of detail that the Preferred Options for the other market towns now include, and the Preferred Option for Leominster has 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 have been taken into account in this report. Although the Preferred Option has not been changed, it has again been subject to HRA screening and Appropriate Assessment at this stage alongside the newly developed Preferred Options for the remainder of the Core Strategy policies, in order to ensure that the likely impacts of development at Leominster are adequately taken into account, both individually and in combination with the other Preferred Options.

THE REQUIREMENT TO UNDERTAKE HABITATS REGULATIONS ASSESSMENT OF DEVELOPMENT PLANS

- I.6 The requirement to undertake HRA of development plans is set out in the Conservation of Habitats and Species Regulations 2010¹. Therefore, when preparing the Herefordshire Core Strategy, Herefordshire County Council is required by law to carry out a Habitat Regulations Assessment.
- I.7 The Habitats Regulations Assessment refers to the assessment of the potential effects of a development plan on one or more European Sites, including Special Protection Areas and Special Areas of Conservation:
- **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 I of the Birds Directive, and migratory species).
 - **SACs** are designated under the Habitats Directive and target **particular habitats** (Annex I) and/or species (Annex II) identified as being of European importance.
- I.8 Current national planning policy also expects potential SPAs (pSPAs), candidate SACs (cSACs) and Ramsar sites to be included within the assessment².

¹ *The Conservation of Habitats and Species Regulations 2010 (SI No. 2010/490).*

² *Planning Policy Statement 9: Biodiversity and Geological Conservation. OPDM, 2005.*

- **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).

- 1.9 For ease of reference during HRA, these three designations are collectively referred to as **European sites**, despite Ramsar designations being at the international level.
- 1.10 The HRA is usually 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). Significantly, HRA is based on a rigorous application of the precautionary principle and therefore requires those undertaking the exercise to prove that the plan will not have an adverse effect on the site's integrity. Where uncertainty or doubt remains, an adverse impact should be assumed.

Stages of the Habitats Regulations Assessment

- 1.11 **Table 1.1** below summarises the stages involved in carrying out a full HRA.

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	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	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

Stage	Task	Outcome
account mitigation		

Sources:^{3, 4,5,6}

- I.12 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.
- I.13 The HRA should be undertaken by the ‘competent authority’; in this case Herefordshire County Council, and Land Use Consultants (LUC) has been commissioned to do this on its behalf. The HRA also requires close working with Natural England as the statutory nature conservation body⁷ in England in order to obtain the necessary information, agree the process, outcomes and mitigation proposals. As Herefordshire borders Wales, the Countryside Council for Wales (CCW) should also be consulted in its capacity as the statutory nature conservation body for HRA in Wales. The Environment Agency, while not a statutory nature conservation body for the HRA, is also in a strong position to provide advice and information during the HRA, as it is required to undertake HRA for its existing licences and future licensing of activities.

POTENTIAL IMPACTS OF THE HEREFORDSHIRE CORE STRATEGY ON EUROPEAN SITES

- I.14 As the Herefordshire Core Strategy includes proposals for future development in the county (including commercial, retail, minerals, waste, tourism, renewable energy, residential 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.

³ Technical Advice Note 5: Nature Conservation and Planning – Annex 6. Welsh Assembly Government, 2009.

⁴ 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.

⁵ 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.

⁶ The Appropriate Assessment of Spatial Plans in England. A guide to why, when and how to do it. RSPB. August 2007.

⁷ Regulation 5 of The Conservation of Habitats and Species Regulations 2010. HMSO Statutory Instrument 2010 No. 490.

Table 1.2 Potential impacts and operations adversely affecting European sites.

Broad categories, 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) - Coastal squeeze - Mine collapse - Smothering - Habitat degradation 	<p>Development (e.g. housing, employment, infrastructure, tourism, coastal defences)</p> <p>Infilling (e.g. of mines, water bodies)</p> <p>Alterations or works to disused quarries</p> <p>Structural alterations to buildings (bat roosts)</p> <p>Afforestation</p> <p>Tipping</p> <p>Cessation of or inappropriate management for nature conservation</p>
<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>Coastal defences</p> <p>Flood defences</p> <p>Port activity</p> <p>Dredging</p> <p>Mineral extraction</p> <p>Recreation (e.g. motor cycling, cycling, walking, horse riding, water sports, caving)</p> <p>Development (e.g. infrastructure, tourism, adjacent housing etc.)</p> <p>Vandalism</p> <p>Arson</p> <p>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)</p> <p>Recreation (e.g. dog walking, water sports)</p> <p>Industrial activity</p> <p>Mineral extraction</p> <p>Navigation</p> <p>Vehicular traffic</p> <p>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) 	<p>Water abstraction</p> <p>Drainage interception (e.g. reservoir, dam, infrastructure and other development)</p> <p>Coastal defences</p> <p>Increased discharge (e.g. drainage, runoff)</p>

Broad categories, and examples, of potential impacts on European sites	Examples of operations responsible for impacts
<ul style="list-style-type: none"> - Barrier effect (on migratory species) - Changes in water temperature - Changes in periodicity of high/low flows 	
<p>Toxic contamination</p> <ul style="list-style-type: none"> - Water pollution - Soil contamination - Air pollution 	<p>Agrochemical application and runoff</p> <p>Diffuse air and soil pollution</p> <p>Navigation</p> <p>Oil / chemical spills</p> <p>Tipping</p> <p>Storm water runoff</p> <p>Vehicular traffic</p> <p>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 - Changes in thermal regime - Changes in turbidity - Air pollution (dust) 	<p>Agricultural runoff</p> <p>Sewage discharge</p> <p>Water abstraction</p> <p>Industrial activity</p> <p>Flood defences</p> <p>Navigation</p> <p>Construction</p>
<p>Biological disturbance</p> <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 	<p>Development (e.g. housing areas with domestic and public gardens)</p> <p>Predation by domestic pets</p> <p>Introduction of non-native species (e.g. from gardens)</p> <p>Fishing</p> <p>Hunting</p> <p>Agriculture</p> <p>Changes in management practices (e.g. grazing regimes, access controls, cutting / clearing)</p>

STRUCTURE OF THE HRA REPORT

I.15 This chapter has introduced the Herefordshire Core Strategy and the requirement to conduct HRA. The remainder of the report is set out in the following sections:

Chapter 2 – Stage I: Screening – Methodology and Findings: Sets out the approach used and the specific tasks undertaken during Stage I of the HRA, and summarises the findings from this exercise.

Chapter 3 – Stage 2: Appropriate Assessment – Methodology and Findings: Summarises the approach taken and the key findings from Stage 2 of the HRA.

Chapter 4 – Conclusions and Next Steps: Draws together the findings of the HRA to date and outlines the next steps to be undertaken.

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2 STAGE I: SCREENING – METHODOLOGY AND FINDINGS

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 61 of the Habitats Regulations 2010 to undertake screening for likely significant effects. Once it is established that a development plan requires HRA, as shown in **Table 1.1** in **Chapter 1**, HRA generally involves three stages (Screening, Appropriate Assessment, and Assessment where no alternatives exist).
- 2.2 This chapter sets out our approach to Stage I (Screening) of the HRA of the Herefordshire Core Strategy Preferred Options including the screening findings. The screening stage involves assessing broadly whether the Plan is likely to have a significant effect on a European site, and therefore requires an 'Appropriate Assessment' of whether this would result in an adverse effect on integrity of the European site in question.

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

- 2.3 As already described, HRA Screening was first undertaken by the 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 the 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 it had correctly identified the suite of European sites that could potentially be affected by the Core Strategy options and 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 has now been produced by Herefordshire Council, and these have been subject to the HRA screening stage in order to identify those proposals with the potential to significantly affect the integrity of European sites, and which therefore need to be taken through to the Appropriate Assessment stage of the HRA. The findings of the Screening of the Core Strategy Preferred Options can be seen in full in **Appendix I** of this report and are summarised further on in this chapter.
- 2.5 It should be noted that the screening matrix was initially prepared on the basis of a draft version of the first batch of Preferred Options, which was produced by Herefordshire Council in June 2010. This was then superseded by the version included in the targeted consultation (produced in July 2010), in which a number of these policies were split out into smaller and more specific policies. Where this was

the case, the screening matrix (**Appendix I**) was updated to reflect the most up to date versions of the policy options as they were revised. The policies relating to Hereford were then produced in early September 2010 and were added to the matrix and screened for likely significant effects, as were the second tranche of General Policies in October 2010.

- 2.6 The HRA Screening of the Herefordshire Core Strategy Preferred Options has been undertaken in line with current available guidance and seeks to meet the requirements of the Habitat's Directive. The tasks that have been completed during the HRA Screening of the Preferred Options are described in detail below. Certain tasks involved in the process, such as identifying sites within and around the county, did not need to be undertaken again at this stage as the findings of the initial Developing Options Screening Report (June 2008) remain valid.
- 2.7 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 has been drawn upon during the preparation of the full HRA report and the comments made are set out in **Appendix 3** along with details of how they have been addressed. A second HRA meeting has been arranged for 16th November, at which further discussion will take place regarding the emerging findings of the full HRA documented in this report.

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

- 2.8 The June 2008 Screening Report that was produced by Herefordshire County Council identified the European sites located within the county (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 order to address the fact that proposals within the Herefordshire Core Strategy may affect European sites outside the administrative boundary of the plan. This distance was used to ensure that designated sites outside the county boundary that could also 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 extent of those sites has been considered.
- 2.9 The European sites identified within Herefordshire (+15km) which have the potential to be affected by the Core Strategy are listed below in **Table 2.1** below and are mapped in **Figure 2.1** further ahead in this chapter.

Table 2.1 European sites within the Herefordshire County boundary (+15km)

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

- 2.10 The attributes of these sites which contribute to and define their integrity were described (see **Appendix 3** of the June 2008 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 and the specific sensitivities of the site, therefore enabling later analysis of how the potential impacts of the Herefordshire Core Strategy may affect site integrity.

Description of the Herefordshire Core Strategy

- 2.11 As described in **Chapter 1**, the Preferred Options for the Herefordshire Core Strategy were produced in stages. The first phase of Preferred Options included General Policies relating to:
- Affordable housing
 - Employment
 - Gypsy and traveller sites
 - Local distinctiveness (now split out into four separate policies covering landscape, biodiversity, built environment and streetscape and archaeology, under the overall theme of Natural and Built Heritage Assets)
 - Minerals
 - Waste
 - Movement

- Open space, sport and recreation (now split out into three separate policies covering open space, sport and recreation facilities and the protection of existing sports and recreation facilities)
 - Social and community infrastructure
- 2.12 In addition, Preferred Options for the Rural Areas policies and spatial options for the following market towns were also produced at this stage:
- Ledbury
 - Bromyard
 - Ross-on-Wye
- 2.13 Following on from these initial Preferred Options, six further Preferred Options for policies relating to development in **Hereford** were produced. The final stage was the production of the second tranche of General Policies, including six Preferred Options relating to:
- The Economy
 - Sustainable Strategic Design
 - Tourism
 - Sustainable Water Management
 - Renewable Energy
 - Infrastructure Contributions
- 2.14 As described in **Chapter I**, the Preferred Option for Leominster has also been assessed as part of this HRA along with the other spatial options, although it has not been developed further since the Place Shaping stage.
- 2.15 It should also be noted that, at the Place Shaping stage, it was decided that a spatial option for development at Kington will be included in the forthcoming Market Towns and Rural Areas Plan (MTRAP) rather than as part of the Core Strategy, and at that stage the development of a spatial policy for Kington as part of the Core Strategy therefore ceased. The likely impacts of the development proposed there under the MTRAP will be assessed in a separate HRA report for that plan, and will take into consideration any potential in-combination effects with the Core Strategy policies. A Preferred Option for development at Kington has therefore **not** been developed or assessed as part of this HRA for the Core Strategy.

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

- 2.16 Article 6(3) of the Habitats Directive requires an Appropriate Assessment of ‘Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or *in combination* with other plan or projects’. The first stage in identifying ‘in-combination’ effects involved identifying

which other plans and projects may be affecting the European sites that were the focus of this assessment.

- 2.17 The review of other plans needs to identify any components that could have an impact on European Sites within the plan area boundary (+15km), e.g. areas or towns where additional development is proposed near to the European Sites (as there could be effects from transport, water use, infrastructure and recreation pressures associated with new developments).
- 2.18 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 has been undertaken, focusing on planned spatial growth within the adjacent authorities to the plan area (**Appendix 4**). The review focused on the spatial strategies and policies in the Forest of Dean, Malvern Hills, Shropshire, Monmouthshire and Powys Core Strategies or Local Development Plans. The most recent HRA Reports for those plans were reviewed where available, as a guide to the potential for any of the proposals in those plans to have adverse effects on the European sites being considered in this study. Where potentially significant effects have been identified or not ruled out for these other plans, their potential to combine with effects from the Herefordshire Core Strategy has been considered. In addition, the Water Cycle Study for Herefordshire has been drawn upon as it collates information from available water resource management plans within the county, which helps to indicate potential for planned water abstraction requirements to combine with pressures on European sites from the Core Strategy.
- 2.19 In terms of projects that may have in-combination effects, the Welsh Assembly government guidance on HRA (Annex 6 of TAN 5) lists the following projects that should be considered:
- projects which have already been implemented or completed;
 - projects which have been given consent but which have not yet been implemented or completed;
 - projects for which applications for consent have been made; and
 - ongoing projects that are subject to periodic regulatory reviews, such as discharge consents or waste management licences.
- 2.20 We are working with Herefordshire County Council to identify a list of projects that fit the categories above. An initial list has been provided, and this is included at the end of **Appendix 4**. In addition, the Environment Agency is required under the Habitats Directive to review all permissions that were granted before the Habitats Regulations came into force. This process was referred to as the Review of Consents and was undertaken between 2000 and March 2010. The Review of Consents reviewed the impacts of all permissions to control emissions to air, land and water (e.g. for sewage treatment discharges and emissions to air from waste facilities etc.) to determine whether those processes are having significant effects on European sites. The findings of the Review of Consents for the European sites within Herefordshire (+15km) are not publicly available on the Environment Agency website.

Therefore, we are hoping to discuss with an Environment Agency officer at the workshop on 16th November, whether the Review of Consents work is complete, and if any significant effects were identified on these sites from current permissions, as this will identify particular projects licensed by the EA that should be taken into consideration for potential in-combination effects with the Herefordshire Core Strategy.

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

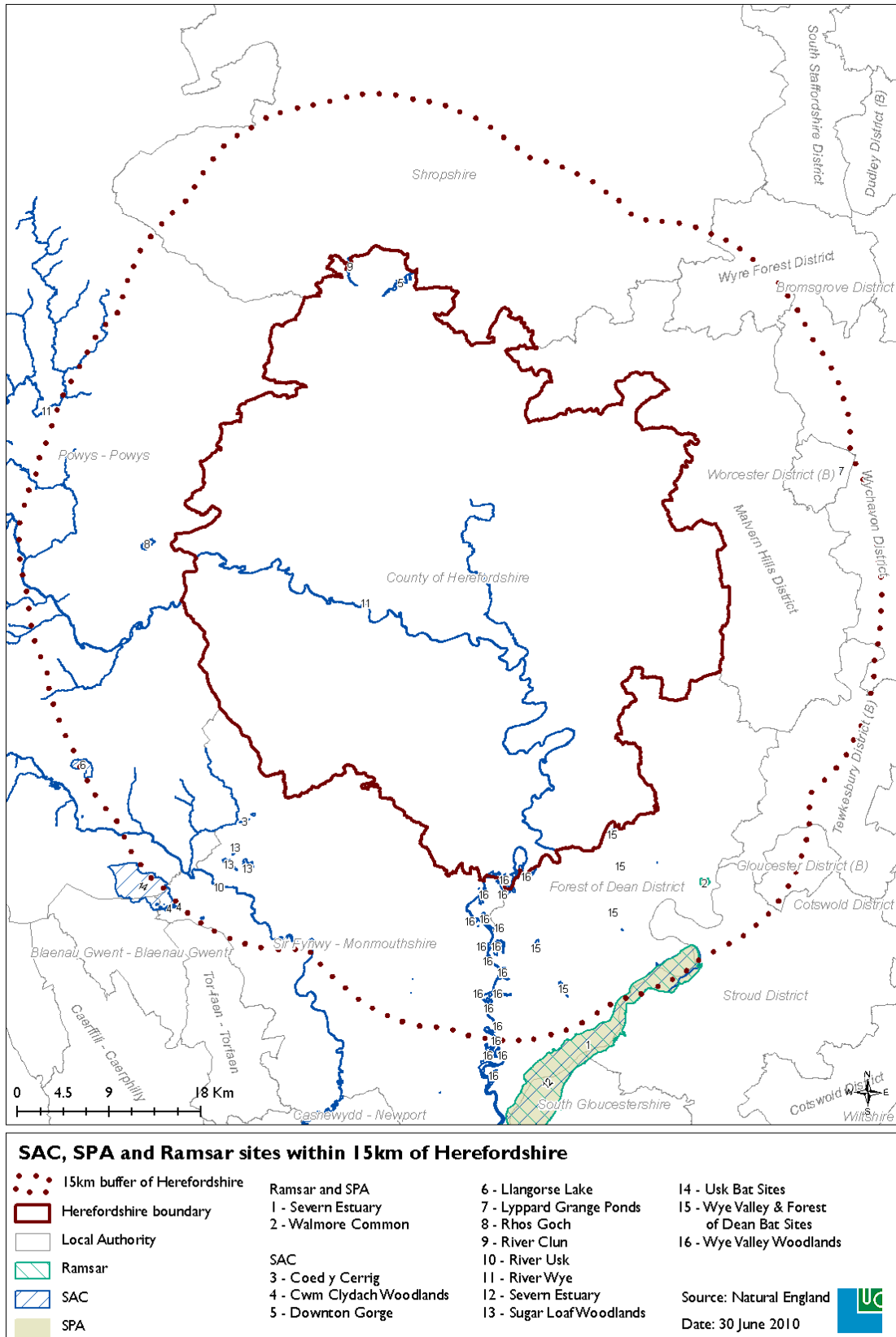
- 2.21 As required under Regulation 61 of the Amended Habitats Regulations 2010, a screening assessment of the ‘likely significant effects’ of the Preferred Options for the Herefordshire Core Strategy has been undertaken. A screening matrix was prepared in order to identify which of the Preferred Options would be likely to have a significant effect on European Sites. The findings of the screening assessment of the Preferred Options can be seen in **Appendix I**, and are summarised further on in this chapter. A ‘traffic light’ approach was used to record the likely impacts of the suggested policy approaches on European sites and their qualifying habitats and species, using the colour categories shown in **Table 2.2** below.

Table 2.2 Approach to identifying those options which may impact upon European sites

Red	There are likely to be significant effects.
Amber	There may be significant effects, but this is currently uncertain.
Green	There are unlikely to be significant effects.

- 2.22 Particular consideration was given to the possible pathways through which effects from activities associated with proposals within the Herefordshire Core Strategy may be transmitted to features contributing to the integrity of a European Site (e.g. via groundwater, air, river catchments etc.). A risk-based approach involving application of the precautionary principle was adopted in the assessment of likely significant effects, such that an assessment of ‘no significant effect’ was only made where it was considered very unlikely, based on current knowledge and information available, that a proposal could have a significant effect on the integrity of a European site(s).
- 2.23 The screening component of the HRA took the approach of screening each general policy and spatial option individually, which is consistent with current guidance documents. In reality, however, the objectives and policies within the Core Strategy will combine to deliver a particular scale, location and type of development across the county, and therefore the potential effects of the proposals in combination also needed to be considered.

Figure 2.1 Map of European Sites in and adjacent to Herefordshire



Reproduced from Ordnance Survey information with the permission of The Controller of Her Majesty's Stationery Office, Crown Copyright, Land Use Consultants, Licence Number 100019265
Location: J:\CURRENT PROJECTS\4900s\4939 Hereford SA & HRA\GIS-graphics\Themes\ArcGIS9-2\4939-001_001_Natura_2k_within_15km.mxd

SCREENING FINDINGS OF GENERAL POLICIES AND SPATIAL OPTIONS

- 2.24 This section sets out the findings of the screening exercise, whilst the full screening matrix used for the assessment can be seen in **Appendix I**.

Note that the screening findings below for options where a significant effect is considered likely or uncertain triggered a more detailed assessment under Stage 2 of the HRA: Appropriate Assessment – the findings of which are described in **Chapter 3** of this report. The screening findings summarised below are not therefore the final conclusions of the HRA for the Preferred Options and the screening findings are superseded by the findings of the Appropriate Assessment stage, which are reported on in **Chapter 3**.

Significant effects likely

- 2.25 Based on the information available, two of the Preferred Options were concluded to be **likely** to have a significant adverse effect on a European site within Herefordshire (+15km). These were **M.1: Movement** and **H.2: Hereford Movement Policy**. This conclusion was reached as a result of the fact that these policies support the construction of a relief road to the west of the city centre. The details included in policy H.2 show that this relief road would directly cross the **River Wye SAC**, potentially resulting in physical damage to habitat, non-physical disturbance to the qualifying species of the site as well as an increase in air pollution from the passing vehicle traffic. However, it is recognised within the policy that mitigation measures may be put in place to reduce the severity of the likely impacts; for example the implementation of good practice construction techniques and the use of wide-span bridge structures, and these and other potential mitigation measures have been considered further through the Appropriate Assessment in Stage 2 (see **Chapter 3**).

Significant effects uncertain

- 2.26 For 15 of the Core Strategy Preferred Options, it was uncertain from the Screening stage whether the policy proposals would result in significant negative effects on European sites in and around Herefordshire. These options are summarised below, and on the basis of the uncertain screening conclusion, were considered in more detail through the Appropriate Assessment in Stage 2 (see **Chapter 3**).
- 2.27 For all of the Preferred Options listed below, an uncertain conclusion was reached due to the fact that it was considered likely that the proposal will result in some form of development; however, at this stage in the Core Strategy development there is insufficient information about the likely type, scale and precise location of the development to be able to reach a conclusion about the likelihood of there being a significant effect on **any of the European sites** within Herefordshire.

Employment

- E.1: Maintaining supply of employment Land

Rural Areas

- RA.1: Rural Areas
- RA.5: Rural economy

2.28 Due to the uncertainties at this stage regarding the type, scale and precise location of the development that may result from these proposals, the potential impacts are wide ranging and may be experienced at any of the European sites within and just outside the county (see **Figure 2.1** and **Table 2.1** above). **Physical impacts** may involve **habitat loss, damage or disturbance** either during construction and/or operation of a development, **or erosion/trampling** as a result of increased pressure for recreation space; whilst **non-physical impacts** such as **vibration, noise, air and/or light pollution** may result from construction activities and increased vehicle traffic. For the proposal that may directly result in housing development (RA.1), and those which are likely to lead indirectly to an increase in both the permanent and tourist populations (EC.1 and EC.2) it is also possible that **hydrological regimes at sensitive European sites may be disrupted** as a result of increased demand for water abstraction and/or treatment resulting in water pollution, although again the site(s) likely to be affected are unknown at this stage due to a lack of information, for example about the likely location of the rural housing development planned under proposal RA1 and the specific location of the majority of tourist accommodation that may be provided through policy proposal EC.2.

2.29 For some of the preferred options, more information is provided within the Core Strategy about potential development locations, and therefore it was recognised that certain European sites may be more likely to be significantly affected, as listed below. The types of effects identified are the same as those above. However, the screening conclusion is still uncertain, and these sites and preferred options were also considered further through the AA stage.

Employment

- E.2 Employment land provision – significant effects are uncertain 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 employment land provision is to be focused.

Gypsy and Traveller Sites

- GT.1 Gypsy and traveller sites – significant effects are uncertain but more likely to affect River Wye SAC, Wye Valley & Forest of Dean Bat Sites and Wye Valley Woodlands, Coed y Cerrig and Rhos Goch SACs due to their closer proximity to Hereford, the Market Towns, Rural Service Centres and Hubs, and local centres, (where gypsy and traveller sites will be allowed within 5km of these towns and villages).

Open Space, Sport and Recreation

- OS.2: Sport and Recreation Facilities - significant effects are uncertain but more likely to affect River Wye SAC, Wye Valley & Forest of Dean Bat Sites and Wye

Valley Woodlands, Coed y Cerrig and Rhos Goch SACs due to their closer proximity to Hereford and the Market Towns, which are where the provision of sports and recreation facilities is likely to be focused.

Social and Community Infrastructure

- Social and community infrastructure - significant effects are uncertain but more likely to affect River Wye SAC, Wye Valley & Forest of Dean Bat Sites and Wye Valley Woodlands, Coed y Cerrig and Rhos Goch SACs due to their closer proximity to Hereford and the market towns.

Waste

- W.1: Waste streams and targets - significant effects are uncertain but more likely to affect River Wye SAC, Wye Valley & Forest of Dean Bat Sites and Wye Valley Woodlands, Coed y Cerrig and Rhos Goch SACs due to their closer proximity to Hereford and the market towns, which are where the provision of waste management facilities is likely to be focused.

Economy

- EC.1: Economy - significant effects are uncertain but more likely to affect River Wye SAC, Wye Valley & Forest of Dean Bat Sites and Wye Valley Woodlands, Coed y Cerrig and Rhos Goch SACs due to their closer proximity to Hereford and the market towns, which are where a large proportion of the resulting development is likely to be focused.
- EC.2: Tourism - significant effects are uncertain but more likely to affect River Wye SAC, Wye Valley & Forest of Dean Bat Sites and Wye Valley Woodlands, Coed y Cerrig and Rhos Goch SACs due to their closer proximity to Hereford and the market towns, which are where a large proportion of the resulting development is likely to be focused.

Spatial options

- Ross-on-Wye – hydrological impacts were considered most likely to affect the River Wye due to its close proximity to the development proposed. Effects relating to an increase in recreation activities in the area were most likely to affect the Wye Valley Woodlands SAC, the Wye Valley and Forest of Dean Bat Sites SAC and Walmore Common SPA and Ramsar site due to their proximity to Ross-on-Wye.
- Bromyard - the River Frome (which is likely to be affected as a result of its proximity to Bromyard) is a tributary of the River Wye SAC, and so the potential effects identified could combine with increased pressure on sewage treatment capacity discharging to the River Wye in association with development planned at Leominster, Hereford and Ross-on-Wye.
- Leominster – the Rivers Arrow and Lugg, which are tributaries of the River Wye SAC) may be adversely affected in terms of the increased demand for water abstraction and treatment that may be associated with the scale of housing

development proposed here and again, impacts may combine with those arising from the housing development proposed at Bromyard, Hereford and Ross-on-Wye. In addition, an increase in recreation pressure as a result of the growing population may adversely affect the River Wye SAC.

- Ledbury – the development of up to 1,700 new homes, as proposed under this option, may result in an increase in demand for water abstraction and treatment, which may have an adverse impact on nearby European sites depending on the source of water supply and the location of the sewage treatment works which will serve the new development.

Hereford Policies

- 2.30 All of the Hereford policies (H.1-H.5) could potentially have an adverse impact on the River Wye SAC, either in terms of non-physical disturbance resulting from nearby development or interruptions to hydrological regimes due to changes in water quality.
- 2.31 In the case of the all of the preferred spatial options for **Hereford, Bromyard and Ross-on-Wye**, housing development is planned within reasonably close proximity to the River Wye SAC and/or its tributaries (River Lugg, River Frome). Although the distance between the planned development and the River Wye SAC is sufficient that there is unlikely to be any direct physical loss or damage to the site, it is possible that there may be some **interruption to hydrological regimes** at the site (e.g. through increased abstraction for public water supply) and risk of **water pollution** due to increased demand for water abstraction and/or treatment in the surrounding area.

Significant effects unlikely

- 2.32 The remaining twenty two Preferred Options were found to be **unlikely** to result in significant adverse effects on European sites within Herefordshire. In most cases this was because the proposal would not itself result in development i.e. it related instead to criteria for development which is proposed under other policies/plans.
- 2.33 The following proposals were ruled out on the basis that they will not directly lead to development:

Open space

- OS.1: Open Space
- OS.3: Protection of Existing Sport and Recreation Facilities

Affordable Housing

- AH.1 Affordable Housing

Minerals

- MN.1: Minerals safeguarding areas
- MN.3: Small-scale non-aggregate building stone and clay production

- MN.4: Secondary (reused and recycled) aggregates – *also includes aim to protect the natural environment*
- MN.5: Moreton on Lugg railhead
- MN.6: Apportionments

Waste

- W.2 Location of new waste facilities - *also includes aim to protect the natural environment*
- W.3 Existing and permitted waste treatment sites
- W.4 Anaerobic Digesters
- W.5 Waste minimisation and management in new developments

Rural Areas

- RA.2: Rural service centres/hubs
- RA.3: Other settlements outside of the RSCs and hubs - *also includes aim to protect the natural environment*
- RA.4: Open countryside

Renewable Energy

- EN.1: Renewable Energy– *also includes aim to protect the natural environment*

Infrastructure Contributions

- ID.1: Infrastructure Contributions

2.34 In a number of cases, policy proposals 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 may have the potential to mitigate some of the possible adverse effects arising from other proposals, although amendments to the wording may be required in order to maximise the potential mitigation effects, and this is considered in more detail at the Appropriate Assessment stage. Note that some of the proposals which were screened out mainly on the basis that they would not lead directly to development also include measures relating to the protection of the natural environment, and this has been noted next to the relevant policies listed above. The following policy proposals were screened out based entirely on the measures that they include for the protection of the natural environment:

Local distinctiveness (note that this has now changed to natural and built heritage assets, and the green infrastructure policy is dealt with separately as a stand-alone theme)

- Protection of natural and historical assets (note that this single policy has now been split out into three separate and more specific policies NH.1-NH.4)
- Green Infrastructure

Minerals

- MN.2: Criteria for the assessment of minerals related development

Sustainable Strategic Design

- LD.4: Sustainable Strategic Design

Sustainable Water Management

- WM.1: Sustainable Water Management– *also includes aim to protect the natural environment*

POTENTIAL MITIGATION

- 2.35 In general, the likelihood of significant negative effects on European sites arising from implementation of the Core Strategy Preferred Options was not able to be ruled out through the screening exercise because some of the Preferred Options are likely to lead (either directly or indirectly) to an increase in new development, bringing with it associated potentially negative impacts on water quality and availability at European sites, increased visitor numbers at European sites, or an increase in the volume of car traffic in the area. Thus the potential effects identified included physical damage to habitat from construction and demolition and/or erosion/trampling, changes to water quality or quantity, and non-physical disturbance including vibration, air, noise and light pollution. However, the magnitude of the potential effects and their specific pathways were not yet fully understood, and thus needed to be considered in more detail through the appropriate assessment (see **Chapter 3**).
- 2.36 Mitigation of some of the identified potential effects could be achieved through the requirement for good practice measures during construction (e.g. of transport infrastructure) such as noise and light reduction (e.g. directional lighting and limits regarding the lux levels⁸ of lights etc), 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.
- 2.37 Certain proposals within the Core Strategy should also help to implement some of the mitigation measures described above and help to avoid significant effects on European sites (e.g. the policy options relating to the protection of natural and historical assets; open space, sport and recreation and sustainable strategic design). The extent to

⁸ The lux is a unit of luminance and luminous emittance, used as a measure of the intensity of light that hits or passes through a surface, as perceived by the human eye.

which there is potential for mitigation to be included within the Core Strategy was considered in more detail during the Appropriate Assessment stage of the HRA (see **Chapter 3** and **Appendix 2**).

DRAFT

3 STAGE 2: APPROPRIATE ASSESSMENT – METHODOLOGY AND FINDINGS

- 3.1 Following the Screening stage, the plan-making authority is required under Regulation 61 of the Amended Habitats Regulations 2010, to make an ‘Appropriate Assessment’ of the implications of the plan for European sites, in view of their conservation objectives. EC Guidance⁹ states that the Appropriate Assessment stage of the HRA should consider the impact 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.
- 3.2 An Appropriate Assessment was therefore undertaken for all of the European sites in Herefordshire (+15km) where either likely or uncertain effects from Core Strategy Preferred Options were identified during the Screening stage (the Screening findings are included in **Chapter 2** and **Appendix I**).

Note that uncertainty relating to the Appropriate Assessment conclusions and any remaining information requirements will be discussed with internal and external stakeholders at a meeting which has been arranged for 16th November 2010. The findings and conclusions of this HRA report will be updated following that meeting. Where particular uncertainties or questions for discussion at that meeting have been identified, these are highlighted in shaded boxes at the end of the relevant section.

APPROPRIATE ASSESSMENT METHODOLOGY

Assessing the effects on site integrity

- 3.3 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 I**, a conclusion needs to be reached as to whether or not a proposal would adversely affect the integrity of a European site. In order to try to reach such a conclusion, consideration was given to whether the predicted impacts of the Core Strategy policy proposals (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.

⁹ 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.

- 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.
- 3.4 In order to make a judgement about the likelihood of policy proposals having an adverse effect on the integrity of a European site, a matrix was drawn up (see **Appendix 2**) which considered separately each of the European sites which may be affected by a proposal, allowing for the fact that the qualifying features of each site vary. The conservation objectives for each European site (where available) are generally to maintain the qualifying features in favourable condition, as determined by the satisfaction of various conditions specific to the site.
- 3.5 For each site that was identified at the screening stage as having the potential to be affected by a proposal in the Core Strategy, 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. In making these judgements, the following assumptions and data sources were used in relation to the potential impacts identified at the screening stage.

Noise, Vibration and Light Pollution

- 3.6 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. From a review of Environment Agency internal guidance on HRA and various websites it is considered that effects of noise are more likely to be significant if development is proposed within 500 metres of a European site with qualifying features sensitive to these types of disturbance.
- 3.7 Vibration effects may also result where development takes place in close proximity to European sites which include otters and fish species as qualifying features. It is assumed that for such disturbances to have an adverse impact, 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 be located within the county boundary, and therefore any resulting vibration is not considered likely to affect sites located outside of the boundary. The only site within the county which includes qualifying features likely to be affected by vibration is the River Wye SAC.
- 3.8 Artificial lighting at night (e.g. street lamps, flood lighting and security lights) is most likely to affect bat populations, and therefore to have an adverse effect on the integrity of European sites where bats are a qualifying feature. In line with the assumptions used in the HRA of the West Midlands RSS¹⁰, we have used a 10km buffer to establish the likely zone of influence of development and associated activities on European sites in which bats are a qualifying feature. Within this identified zone, more detailed information about the locations of foraging/roosting sites and patterns of movement

¹⁰ Habitats Regulations Assessment of the Phase II Revision of the Regional Spatial Strategy for the West Midlands (October 2007) Prepared for West Midlands Regional Planning Body by URSUS Consulting Ltd. and Treweek Environmental Consultants.

has been used in order to draw a judgement about the likely effects of Core Strategy proposals on particular sites. In particular, the emerging Herefordshire County Council Bat Study¹¹ 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 effects of Core Strategy proposals which may lead to development and other activities within the vicinity of bat sites, and about the potential mitigation measures that may remove such effects.

We are uncertain about the appropriate assumption to be applied with regards to the distance over which vibration effects are likely to be experienced, as it will not be possible to determine in this strategic level HRA the proximity of proposed development areas (which are not specifically defined in the Core Strategy) to specific locations of qualifying fish species spawning sites or otter breeding sites etc.

Air pollution

- 3.9 Air pollution is most likely to affect 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.
- 3.10 In terms of vehicle traffic, nitrogen dioxides (NO_x) 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.
- 3.11 Based on the Highways Agency *Design for Road and Bridges 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.
- 3.12 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 adverse effect from traffic-related air pollution was considered to be the likely outcome.
- 3.13 A separate HRA for the Hereford relief road is being undertaken¹², and when the findings from this are available, they will be taken into consideration for this HRA.
- 3.14 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

¹¹ Herefordshire Biological Records Centre (June 2010) Greater and Lesser Horseshoe Bats in South Herefordshire 2010: A Study to Inform Herefordshire Council's Local Development Framework.

¹² This HRA work is being undertaken by Hyder Consulting on behalf of Herefordshire County Council, further to the *Hereford Relief Road Study of Options* Amey (2010).

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.

3.15 Due to a lack of spatial information within the Core Strategy policies about the specific locations of individual types of developments, the potential for such development to negatively impact upon European sites as a result of air pollution cannot be assessed until the planning application stage. However, where a site was found to lie downwind of the prevailing south-westerly wind direction, it was recognised that the likelihood of such effects occurring may be higher. In addition, such effects were considered more likely to impact upon those sites that are located in close proximity to the main settlements within Herefordshire, as it is likely that most development would be focused in and around the existing urban areas.

3.16 Data from the Air Pollution Information System (APIS) has also 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 particularly adverse impacts.

Recreation and 'urban' impacts

3.17 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 proposals 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 easily accessible from the main population centres in Herefordshire.

3.18 The Herefordshire Green Infrastructure study¹³ was used to help inform judgements about the potential mitigation measures that could be used to minimise the likely effects of increased recreation pressure on European sites within the county.

Interruption to Hydrological Regimes – Water Quantity

3.19 The water supply in Herefordshire comes mainly from Welsh Water but also Severn Trent. The Draft Water Resources Management Plan (WRMP) for Welsh Water¹⁴

¹³ Herefordshire Council (2008) Herefordshire Green Infrastructure Strategy

¹⁴ Welsh Water (2008) Draft Water Resources Management Plan

identified seven water resource zones (WRZs) in which there is forecast to be a deficit in supply, either all year or during periods of peak demand, up to 2034/35. One of these is located within fairly close proximity to Herefordshire (the Vowchurch WRZ to the west of the county). Although the preferred measures for addressing these deficiencies involve improved water efficiency, metering and addressing leakages, the WRMP acknowledges that increased abstraction may be necessary in the future. However, Welsh Water is currently working on a final version of the WRMP, and from information provided to Herefordshire Council from the Water Resources Department of Dwr Cymru Welsh Water (DCWW) (23rd September 2010), the water company is not forecasting any supply deficits in Herefordshire, apart from a deficit in the Vowchurch Water Resource Zone. As this WRZ only makes up 2% of Herefordshire, the water company states that it can meet the forecast growth in Herefordshire without increased or new abstraction licences. However, this conclusion is dependent on the outcomes of the Environment Agency's Habitats Directive Review of Consents (RoC) work, as this may show that European sites are already being adversely affected by current water abstraction licences, and sustainability reductions may need to be applied. Welsh Water is therefore delaying publishing the WRMP until next year, once this is available.

We are hoping to discuss the status of the Environment Agency's Review of Consents work at the meeting on 16th November, and whether sustainability reductions are likely to be applied to any of Welsh Water's current abstraction licences.

- 3.20 The WRMP for Severn Trent Water¹⁵ also recognises that additional water resources will be required in the long-term. In addition to measures such as improved water efficiency, a number of schemes are identified, which should help to improve the resilience of the supply network and provide additional output to the East Midlands, Severn and Birmingham zones. None of these are located within Herefordshire; however, it is not ruled out that additional abstractions may also be required within the county.

Water Quality

- 3.21 With regards to water quality, the Environment Agency confirmed the location of sewage treatment works servicing Herefordshire. Further information about water treatment and abstraction was obtained from the Herefordshire Water Cycle Study¹⁶. 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. The River Lugg catchment suffers from pollution pressures from phosphates entering the river from STW discharges and agricultural diffuse pollution. Diffuse pollution also arises from urban areas.
- 3.22 Herefordshire Council has been consulting with Dwr Cymru Welsh Water regarding capacity in the STWs serving towns and villages within Herefordshire. **Table 3.1** lists the towns and villages served by the principal STWs in Herefordshire, and where the Environment Agency's Review of Consents work has highlighted an 'adverse effect'. In addition, DCWW has provided information to Herefordshire Council regarding the

¹⁵ Severn Trent Water (2010) Water Resources Management Plan

¹⁶ Herefordshire Outline Water Cycle Study (2009) Brian Faulkener (for Herefordshire County Council)

status of any modifications to the discharge consents that have been implemented (e.g. tightening the limits in terms of phosphate or ammonia levels etc.) and whether there is sufficient 'headroom' or treatment capacity within the STWs to accommodate the levels of growth proposed in the Herefordshire Core Strategy Preferred Options.

- 3.23 Table 3.1 shows that for many of the STWs, while some upgrading has already taken place, future upgrades will be required to accommodate the levels of growth planned in some towns and villages. For any further upgrading work that is not already planned for in the current 5 year Investment Plans (AMP 5, 2010-2015), DCWW has advised Herefordshire Council that it will apply for appropriate funding in the subsequent Investment Plans, as the plan period for the Core Strategy is until 2026. Therefore, future STW upgrading should be able to be delivered to meet planned growth during the life of the Core Strategy, as specific development sites and housing numbers are confirmed for particular towns and villages, through the Investment Plans, subject to funding approval from the Water Industry Regulator (Ofwat).

We are hoping to discuss the information in Table 3.1 at the meeting on 16th November, as it is unclear which European sites might be being 'adversely affected' by the STW discharge consents as identified in the Water Cycle Study.

In addition, we would like to discuss the feasibility of Welsh Water's recommendation to Herefordshire Council (in their letter of 23rd September 2010 from Ryan Bowen to Kevin Singleton) that land only be released for development in the latter part of the plan period (presumably to allow for funding for future upgrades).

Table 3.1: Towns and villages served by principal STWs in Herefordshire, and measures proposed or implemented to avoid adverse effects on the River Wye SAC

STW	Towns and villages served¹⁷	River STW discharges into	Is STW posing environmental risks that could affect the River Wye SAC?¹⁸	What mitigation measures are proposed or have been implemented?¹⁹
Hereford Rotherwas	Hereford, Bishopstone, Kenchester, Credenhill, Burghill, Swainshill, Stretton Sugwas, Kings Acre, Lower Bullingham, Grafton, Tupsley, Bartestree, Hagley, Lugwardine, Withington, Holmer	River Wye	EA RoC work (as reported in Water Cycle Study, September 2009) concluded STW consent having an adverse effect on River Wye SAC. However, RoC work is still being completed.	Upgrading works were completed by DCWW in March 2010 that allow for an additional 3,800 homes in Hereford to be connected for treatment. Any further housing growth above this will require further improvement works. Consents in force in December 2010 to tighten BOD to 28 mg/l and ammonia to 10.3 mg/l.
Hereford Eign	As above	River Wye	EA RoC work (as reported in Water Cycle Study, September 2009) concluded STW consent having an adverse effect on River Wye SAC. However, RoC work is still being completed.	Upgrading works were completed by DCWW in March 2010 that allow for an additional 3,800 homes in Hereford to be connected for treatment. Any further housing growth above this will require further improvement works. Consents in force in December 2010 to tighten BOD to 28 mg/l and ammonia to 10.3 mg/l.

¹⁷ From Table 7-1 in the Water Cycle Study.

¹⁸ From Table 7-8 in the Water Cycle Study.

¹⁹ From Table 7-8 in the Water Cycle Study, plus correspondence from DWCC to Herefordshire Council (Actions note from meeting with Herefordshire Council on 17th September 2010, and a letter to Herefordshire Council dated 23rd September 2010 regarding the preferred strategic development sites for Herefordshire Core Strategy).

STW	Towns and villages served¹⁷	River STW discharges into	Is STW posing environmental risks that could affect the River Wye SAC?¹⁸	What mitigation measures are proposed or have been implemented?¹⁹
Lower Cleeve	Ross-on-Wye Brampton Abbotts Lea Weston Under Penyard Coughton Walford Court Green Meadows Hom Green	River Wye	None reported in Water Cycle Study, September 2009.	Upgrading works were completed by DCWW in March 2010 that will allow for the 350 homes proposed at Ross-on-Wye.
Leominster	Leominster Barons Cross	River Lugg (Tributary of River Wye)	EA RoC work (as reported in Water Cycle Study, September 2009) concluded STW consent having an adverse effect on River Wye SAC?. However, RoC work is still being completed.	Upgrading works were completed by DCWW in March 2010. However, DCWW states that any proposals above the previous Unitary Development Plan allocations will require further upgrading. Consent modification issued 2009 with 9mg/l ammonia limit.
Bromyard	Bromyard	River Frome (Tributary of Rivers Lugg and Wye)	EA RoC work (as reported in Water Cycle Study, September 2009) concluded STW consent having an adverse effect on River Wye SAC?. However, RoC work is still being completed.	Upgrading works were completed by DCWW in March 2010 that will allow for the 250 homes proposed at Bromyard. In addition, works to resolve flooding issues at Petty Bridge waste water pumping station will be undertaken December 2010 to March 2011. Consent modification issued 2009 with 1mg/l phosphate limit.
Moreton on Lugg	Moreton Marden Sutton Wellington	River Lugg (Tributary of River Wye)	EA RoC work (as reported in Water Cycle Study, September 2009) concluded STW consent having an adverse effect on River Wye SAC?. However, RoC work is still being completed.	Upgrading works were completed by DCWW in March 2010. However, DCWW states that any proposals for these towns above the previous Unitary Development Plan allocations will require further upgrading to the STW, and the recommendation was made to Herefordshire Council that land only be released for development in the latter part of

STW	Towns and villages served¹⁷	River STW discharges into	Is STW posing environmental risks that could affect the River Wye SAC?¹⁸	What mitigation measures are proposed or have been implemented?¹⁹
				the plan period (presumably to allow for funding for future upgrades). New consent issued 2010 with 1mg/l phosphate limit.
Kington	Kington	River Lugg (Tributary of River Wye)	Treatment filters and humus tanks at capacity (as reported in Water Cycle Study, September 2009).	Consent issued 2010 with 1mg/l phosphate limit.
Weobley	Weobley	River Lugg (Tributary of River Wye)	EA RoC work (as reported in Water Cycle Study, September 2009) concluded STW consent having an adverse effect on River Wye SAC?. However, RoC work is still being completed.	DCWW advises that this STW is unable to accommodate future housing growth (50-60 houses stated, as provided by Herefordshire Council.) ²⁰ The environmental standards associated with this STW are stringent as the discharge is to a very small brook with low flow conditions. DCWW notes that this level of growth represents a significant increase on the size of this catchment, and the recommendation was made to Herefordshire Council that land only be released for development in the latter part of the plan period (presumably to allow for funding for future upgrades). The Water Cycle Study notes that the STW may have a tightened consent of total phosphate following the RoC outcomes.
Kingstone and Madley	Kingstone, Webton, Madley	River Monnow?	Treatment humus tanks and reed beds at capacity (as reported in Water Cycle Study, September	DCWW state that STW is unable to accommodate the level of growth proposed in Core Strategy (60-70 homes). However,

²⁰ Note that in the Core Strategy Rural Areas Preferred Options, policy RA.2 lists Weobley as a Rural Service Centre, and the supporting text notes that “The scale of development for these villages could be as high as 100 new dwellings over the twenty year period which, as an average, equates to around 5 per year. (There is no intention of developing a single site of 100 houses anywhere in the rural area).”

STW	Towns and villages served¹⁷	River STW discharges into	Is STW posing environmental risks that could affect the River Wye SAC?¹⁸	What mitigation measures are proposed or have been implemented?¹⁹
		(Tributary of lower River Wye)	2009).	investment is planned for year 3 of their current investment Programme (AMP 5, 2010-2015), therefore by March 2013 the upgrade will allow for the proposed growth.
Cleghonger	Cleghonger	River Monnow? (Tributary of lower River Wye)	None identified.	DCWW advises that this STW is unable to accommodate future housing growth (70-80 houses stated, as provided by Herefordshire Council.) DCWW notes that this level of growth represents a significant increase on the size of this catchment, and the recommendation was made to Herefordshire Council that land only be released for development in the latter part of the plan period (presumably to allow for funding for future upgrades).
Presteigne	Presteigne	River Lugg (Tributary of River Wye)	EA RoC work (as reported in Water Cycle Study, September 2009) concluded STW consent having an adverse effect on River Wye SAC?. However, RoC work is still being completed.	Consent modification issued 2009.
Kingsland	Kingsland	River Lugg (Tributary of River Wye)	None identified.	DCWW advises that this STW is unable to accommodate future housing growth (40-50 houses stated, as provided by Herefordshire Council.) DCWW notes that this level of growth represents a significant increase on the size of this catchment, and the recommendation was made to Herefordshire Council that land only be released for development in the latter part of the plan period (presumably to allow for funding for future upgrades).

STW	Towns and villages served¹⁷	River STW discharges into	Is STW posing environmental risks that could affect the River Wye SAC?¹⁸	What mitigation measures are proposed or have been implemented?¹⁹
Pembridge	Pembridge	River Arrow? (Tributary of River Lugg)	None identified.	DCWW advises that this STW is unable to accommodate future housing growth (60-70 houses stated, as provided by Herefordshire Council.) DCWW notes that this level of growth represents a significant increase on the size of this catchment, and the recommendation was made to Herefordshire Council that land only be released for development in the latter part of the plan period (presumably to allow for funding for future upgrades).

APPROPRIATE ASSESSMENT FINDINGS

- 3.24 As already described, for those Preferred Options for the Herefordshire Core Strategy where the screening finding was **uncertain** whether a European site may be significantly affected, or where a policy proposal was considered **likely** to have an adverse effect, the Appropriate Assessment (AA) stage of the HRA process must be undertaken.
- 3.25 The AA stage seeks to determine whether implementation of the proposals in question will result in an adverse effect on the integrity of the whole European site (many European sites are made up of a number of smaller sites). It also considers alternative proposals to avoid adverse effects on European sites and mitigation measures that may be included in the Herefordshire Core Strategy to reduce the likelihood and significance of effects on European sites. The AA stage should help to inform the selection of policies to take forward into the next iteration of the Core Strategy, alongside consultation responses received in relation to the Preferred Options.
- 3.26 The full Appropriate Assessment is set out in **Appendix 2** and the main findings are summarised below, by type of impact. At this stage in the HRA there is still some uncertainty remaining with respect to the conclusions of the HRA, due either to the fact that the policy proposals are still at the Preferred Options stage and are generally not specific in terms of the type, scale and precise location of development that may result, or because further information is required to help reach a conclusion. Recommendations for mitigation and avoidance measures that could be included within the Core Strategy are set out in **Appendix 2** and are summarised in **Chapter 4**.

Noise Pollution and Vibration

- 3.27 A large proportion of the European sites are not vulnerable to noise pollution or vibration as their qualifying features are plants, woodland etc. which are not vulnerable to these effects. Most of the sites that were concluded to be likely to experience adverse effects due to noise include bat species amongst their qualifying features. 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 expected to have an impact 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 an adverse impact on the bats from noise and vibration effects from the housing development proposed under the spatial option for the town cannot be ruled out.
- 3.28 The preliminary findings of the Herefordshire Bat Study²¹ are 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 noise or vibration impacts is not included in the study report. When particular locations come forward

²¹ Herefordshire Biological Records Centre (June 2010) Greater and Lesser Horseshoe Bats in South Herefordshire 2010. A study to inform Herefordshire Council's Local Development Framework.

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, **the likelihood for adverse effects on integrity of the Wye Valley Woodlands SAC and the Wye Valley and Forest of Dean Bat Sites SAC due to noise and vibration effects on bat species associated with development at Ross-on-Wye is considered to be reasonably low, and should be able to be ruled out provided recommended mitigation is implemented** (see Chapter 4).

- 3.29 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. Therefore, recommendations for the Core Strategy to ensure these measures are considered at planning application stage have been included in Chapter 4.

Light Pollution

- 3.30 Most of the sites that were considered likely to be affected by light pollution were those where bat species were a qualifying feature for the site (the Wye Valley Woodlands, Usk Bat Sites and the Wye Valley and Forest of Dean Bat Sites SACs). Impacts from light pollution were ruled out in relation to the Usk Bat Sites SAC due to the distance of the site from the county boundary (approximately 15km). However, in the case of the **Wye Valley Woodlands SAC** and the **Forest of Dean Bat Sites SAC**, further information about the precise scale and type of development that may occur **at Ross-on-Wye, Hereford and the Hereford Relief Road** is required in order to be more certain about the likely impacts, particularly where the location of development that may result from the Core Strategy has not yet been specified. As such, an assessment of the likely impacts of light pollution resulting from development on nearby bats will need to be carried out during HRA of the subordinate DPDs (e.g. the Hereford Area Plan and Market Towns and Rural Areas Plan) and also when specific proposals for development come forward at planning application stage. Light pollution effects relating to bats may be partially mitigated by the use of appropriate street lighting and by the provision of high quality alternative habitat for bat roosting sites (e.g. good quality hedgerows) further away from development sites, and recommendations for the Core Strategy to ensure these measures are considered at planning application stage have been included in Chapter 4.
- 3.31 Light pollution effects may also impact upon the **otters in the River Wye SAC associated with development at Hereford and the Hereford Relief Road**, but such effects may 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, and recommendations for the Core Strategy to ensure these measures are considered at planning application stage have been included in Chapter 4.

Air Pollution

- 3.32 **Adverse air pollution effects relating to increased traffic volumes could not be ruled out at three sites;** these were **Cwm Clydach Woodlands SAC, Usk Bat Sites SAC** and **Wye Valley Woodlands SAC**. All of these sites lie within 200m of an 'A' road, which are considered most likely to experience 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.
- 3.33 As most of the Core Strategy proposals that may result in development do not specify the location of the development, it is not possible to be sure whether vehicle traffic on these particular routes is likely to increase. Once the precise scale, type and location of development is known at the planning application stage, it may be possible to make a more accurate judgement about the likelihood of these impacts occurring; however, without this information it is not possible to rule out increased air pollution at these sites. In addition, 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.
- 3.34 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 EC.1 and waste policies W.1 and W.2), 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 the planning application stage. As such, a full assessment of the likelihood of air pollution adversely affecting nearby European sites will need to be carried out as specific development proposals come forward, and recommendations for the Core Strategy to ensure these measures are considered at planning application stage have been included in Chapter 4.
- 3.35 However, certain sites have qualifying features that are particularly vulnerable to air pollution, and are therefore more likely to experience adverse impacts as a result of any localised air pollution that may arise from development. Where such sites are located some distance outside of the county boundary (Coed Y Cerrig SAC, Cwm Cladach Woodlands SAC, Llangorse Lake SAC, Rhos Goch SAC, Sugar Loaf Woodlands SAC and Usk Bat Sites SAC) they have been ruled out from experiencing air pollution effects from development, as where this occurs it would be localised to the development site and these sites all lie too far from the county boundary to be likely to experience air pollution effects from development within Herefordshire. **The remaining sites, which are located within the county and which are vulnerable to potential air pollution impacts, and so have not been able to be ruled out from such air pollution effects are Downton Gorge SAC and Wye Valley Woodlands SAC.**

Physical Damage/Loss of Habitat

- 3.36 The Hereford Movement Policy (H2) was the only preferred option that specifically directed development within the boundary of a European site, as the proposed Hereford Relief Road will have to cross the **River Wye SAC**. However, the policy specifies that the use of widespan bridge structures would enable direct working within the watercourse to be avoided. A separate HRA is being undertaken for the route options for the proposed relief road²², and the findings from that work will need to be drawn upon when available during the next stage of the HRA. When this information is available, the likely effects of the policy in relation to the construction and operation of the relief road can be more accurately assessed.
- 3.37 None of the other policies which specified locations for development (e.g. the spatial options for Leominster, Bromyard, Ledbury and Ross-on-Wye) were found to be likely to result in physical damage or loss of habitat at any of the European sites within Herefordshire (+15km). However, due to the nature of the Preferred Options, there is a lack of specific information about the location and scale of development that may result from many of them. A number of the policies are likely to result in housing or other forms of development; however the location of much of this development will not be known until the planning application stage. However, policy NH.2 Biodiversity seeks to protect sites of international importance, therefore it is considered unlikely that an adverse effect 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 NH.2, although the policy wording could be strengthened as recommended in **Chapter 4**. Planning applications may also require appropriate assessment if the development location proposed is considered likely to have a significant effect on a European site, and in such cases the likely impacts of the specific development would be able to be considered more thoroughly at that stage.

Recreation Pressure

- 3.38 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, a number of sites were identified as being particularly vulnerable to an increase in pressure as a result of a generally increasing population in the county associated with the housing development proposed in the Core Strategy. Because the housing proposed under the rural areas policy (RA.1) 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. However, an adverse impact on the following sites as a result of increased pressure for recreation space was considered more likely: **River Clun SAC, River Wye SAC, Severn Estuary SAC, Sugar Loaf Woodlands SAC, Wye Valley and Forest of Dean Bat Sites SAC, Wye Valley Woodlands SAC, Severn Estuary SPA/Ramsar site and Walmore Common SPA/Ramsar site**. In most cases, this judgement was made based on the size of the site and its accessibility from the main population centres; however some particular pressures were identified in relation to certain sites as described below.

²² This HRA work is being undertaken by Hyder Consulting on behalf of Herefordshire County Council, further to the *Hereford Relief Road Study of Options* Amey (2010).

3.39 At the **River Clun SAC**, trout fishing is a threat, and at **Sugar Loaf Woodlands SAC** there are already issues associated with deliberately started fires, and although this cannot be classed as a recreation activity, an increase in human presence at the site may compound this issue. The **River Wye SAC** and the **Severn Estuary SPA/Ramsar site** are known already to be popular locations for a wide range of recreation activities which may increase as a result of a growing nearby population (e.g. as a result of the housing development planned at Hereford, Ross-on-Wye and Leominster), whilst the housing development planned at Ross-on-Wye (around 500 new homes up to 2026) may place increased pressure on the **Wye Valley Woodlands SAC** and **Wye Valley and Forest of Dean Bat Sites SAC** due to the scale of the population growth likely to occur and its proximity to these sites. However, the policies included in the Core Strategy in relation to Open Space, Sport and Recreation may help to mitigate any adverse impacts on these sites in relation to increased pressure for recreation space. Therefore, it is considered that **adverse effects on integrity of the above sites due recreation pressure and activities associated with increased housing development across the county should be able to be ruled out provided recommended mitigation is implemented** (see Chapter 4).

Interruption to Hydrological Regimes – Water Quantity

3.40 A number of the European sites within Herefordshire (+15km) are sensitive to changes in water levels. However, even though large numbers of new houses are to be developed under the Core Strategy proposals, and there is likely to be higher demand for water abstraction as a result of these proposals in combination, the Environment Agency has indicated that it is very unlikely to grant licences for additional abstractions within Herefordshire, due to the fact that all are classified already as having 'no water available'. Welsh Water is not currently forecasting any supply deficits in Herefordshire, apart from a deficit in the Vowchurch Water Resource Zone. As this WRZ only makes up 2% of Herefordshire, the water company states that it can meet the forecast growth in Herefordshire without increased or new abstraction licences. However, this conclusion is dependent on the outcomes of the Environment Agency's Habitats Directive Review of Consents (RoC) work. In addition, there are uncertainties with regards to the exact sources of water that will be used to supply the housing developments proposed and regarding the hydrological linkages between these abstractions and European sites in and around Herefordshire.

We are uncertain about the hydrological connectivity between water abstraction locations and particular European sites and would hope to discuss this with the Environment Agency,

3.41 Therefore, it is **uncertain whether there will be adverse effects on integrity of Coed y Cerrig SAC, Lyppard Grange Ponds SAC, Rhos Goch SAC, River Usk SAC, River Wye SAC, Severn Estuary SAC/SPA/Ramsar Site, Usk Bat Sites SAC, Walmore Common SPA/Ramsar Site**, as a result of potential increased water abstraction due to policies E.1, E.2, EC.1, EC.2, RA.1, RA.5, H.1, H.3, H.4, H.5, H.6 and the spatial options for Leominster, Ledbury Bromyard and Ross-on-Wye.

Water Quality

- 3.42 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 River Usk SAC receives discharge from sewage treatment works serving settlements outside of the administrative boundary of the plan; therefore the proposals included in the Core Strategy will not affect the integrity of the site in this way. Similarly, 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 was not considered likely to result in an adverse impact on water quality within the plan area, either alone or in combination with other proposals.
- 3.43 The River Wye was found by the Herefordshire Water Cycle Study to be at 'low' risk from reduced water quality as a result of the Lower Cleeve STW (which serves Ross-on-Wye); however, the two STWs serving Hereford (Eign and Rotherwas) are identified as needing their discharge consents to be tightened, which means that they may have insufficient capacity to adequately treat increased sewage arising from the new housing to be provided in Hereford. Although the proposals for Ross-on-Wye are not in isolation expected to have adverse impacts, the potential for in-combination effects with the preferred options for Hereford and Leominster was considered.
- 3.44 Under five of the policies for Hereford, housing development is proposed within reasonably close proximity of the **River Wye SAC** and **it is possible that there may be adverse impacts on water quality as a result of increased demand for water treatment**. The site is already experiencing impacts on water quality as a result of changing land use within the catchment, and by point-source discharges, therefore any increase in demand for water treatment in the vicinity of the site is likely to be damaging to its integrity. Most of the sewage treatment works that serve the settlements within Herefordshire 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. Therefore, increased pollution pressure on the River Lugg catchment (due to increased pressure on STW capacity associated with new housing proposed at Leominster and some of the Rural Service Centres near Leominster and just north of Hereford), in combination with direct pressure on the River Wye from housing proposed at Hereford, as well as diffuse pollution from agricultural practices and urban areas, could have an adverse effect on the integrity of the River Wye SAC. As such, it remains likely that increased water pollution may adversely affect this site as a result of these proposals.

Summary of Findings

- 3.45 **Table 3.1** below summarises the findings from the Screening and Appropriate Assessment stages in relation to each Preferred Option for the Herefordshire Core Strategy policies. The detailed justifications for these findings are contained in the full screening matrix in **Appendix 1** and the AA matrix in **Appendix 2**.

Key to Table 3.1

Likely to have significant adverse effects on the integrity of at least one European site.

May have significant adverse effects on the integrity of at least one European site, although currently uncertain.

Not likely to have an adverse effect on the integrity of any European site in Herefordshire (+15km)

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Table 3.2: Summary of screening and AA findings for each of the Core Strategy Preferred Options

Core Strategy Preferred Options	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 in the county as a result of the proposal?
AH.1: Affordable housing	Screened out.	N/A
E.1: Maintaining supply of employment land	Taken forward for AA.	Uncertain – effects may remain in relation to air pollution and water quantity.
E.2: Employment land provision	Taken forward for AA.	Uncertain – effects may remain in relation to air pollution and water quantity.
GT.1: Gypsy and traveller sites	Taken forward for AA.	Uncertain – effects may remain in relation to air pollution.
NH.1: Landscape	Screened out.	N/A
NH.2: Biodiversity	Screened out.	N/A
NH.3: Built Environment and Streetscape	Screened out.	N/A
NH.4: Archaeology	Screened out.	N/A
GI.1 Green infrastructure	Screened out.	N/A
MN.1: Minerals safeguarding areas	Screened out.	N/A
MN.2: Criteria for the assessment of minerals related development	Screened out.	N/A
MN.3: Small-scale non-aggregate building stone and clay production	Screened out.	N/A
MN.4: Secondary (reused and recycled) aggregates	Screened out.	N/A

Core Strategy Preferred Options	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 in the county as a result of the proposal?
MN.5: Moreton on Lugg railhead	Screened out.	N/A
MN.6: Apportionments	Screened out.	N/A
M.1: Movement	Taken forward for AA.	Uncertain – effects may remain in relation to air pollution.
OS.1: Open Space	Screened out.	N/A
OS.2: Sport and Recreation Facilities	Taken forward for AA.	Yes.
OS.3: Protection of Existing Sport and Recreation Facilities	Screened out.	N/A
SC.1: Social and community infrastructure	Taken forward for AA.	Yes.
W1: Waste streams and targets	Taken forward for AA.	Uncertain – effects may remain in relation to air pollution.
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
W5: Waste minimisation and management in new developments	Screened out.	N/A
EC.1: Economy	Taken forward for AA.	Uncertain – effects may remain in relation to air pollution and water quantity.

Core Strategy Preferred Options	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 in the county as a result of the proposal?
EC.2: Tourism	Taken forward for AA.	Uncertain – effects may remain in relation to air pollution and water quantity.
LD.4: Sustainable Strategic Design	Screened out.	N/A
WM.1: Sustainable Water Management	Screened out.	N/A
EN.1: Renewable Energy	Screened out.	N/A
ID.1: Infrastructure Contributions	Screened out.	N/A
RA1: Rural areas	Taken forward for AA.	Uncertain – effects may remain in relation to air pollution and water quantity.
RA2: Rural service centres/hubs	Screened out.	N/A
RA3: Other settlements outside of the RSCs and hubs	Screened out.	N/A
RA4: Open countryside	Screened out.	N/A
RA5: Rural economy	Taken forward for AA.	Uncertain – effects may remain in relation to air pollution and water quantity.
Spatial Policy Option for Ledbury	Taken forward for AA.	Uncertain – effects may remain in relation to water quantity.

Core Strategy Preferred Options	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 in the county as a result of the proposal?
Spatial Policy Option for Bromyard	Taken forward for AA.	Uncertain – effects may remain in relation to water quantity.
Spatial Policy Option for Ross-on-Wye	Taken forward for AA.	Uncertain – effects may remain in relation to water quantity and quality.
Spatial Policy Option for Leominster	Taken forward for AA	Uncertain – effects may remain in relation to water quantity and quality.
H1: Hereford City Centre Policy	Taken forward for AA.	Uncertain – effects may remain in relation to air pollution and water quantity and quality.
H2: Hereford Movement Policy	Taken forward for AA.	Uncertain – effects may remain in relation to air pollution.
H3: Growth Distribution Policy	Taken forward for AA.	Uncertain – effects may remain in relation to air pollution and water quantity and quality.
H4: Northern Urban Expansion	Taken forward for AA.	Uncertain – effects may remain in relation to air pollution and water quantity and quality.
H5: Western Urban Expansion	Taken forward for AA.	Uncertain – effects may remain in relation to air pollution and water quantity and quality.

Core Strategy Preferred Options	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 in the county as a result of the proposal?
H6: Southern Urban Expansion	Taken forward for AA.	Uncertain – effects may remain in relation to air pollution and water quantity and quality.

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4 CONCLUSIONS AND NEXT STEPS

- 4.1 The HRA of the Preferred Options for the 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 Appropriate Assessment stage have been summarised in **Chapter 3** of this report, and the justification for these is explained in more detail in **Appendix 2**. **Table 4.1** below summarises the HRA conclusions and recommendations for the Preferred Options for the Herefordshire Core Strategy.

Table 4.1: HRA conclusions for the Preferred Options version of the Herefordshire Core Strategy

Potential adverse effect on European sites as a result of proposed policies in the Herefordshire Core Strategy	Mitigation, recommendations for the Herefordshire Core Strategy and next steps for the HRA
<p>Noise pollution</p> <p>Adverse effects on integrity due to noise pollution arising from policies E.1, E.2, GT.1, M.1, OS.2, SC.1, WI, RA.1, RA.5, H.1, H.2, H.3, H.4, H.5 and H.6 and the spatial option for Ross-on-Wye are not considered to occur in relation to the following sites, provided that mitigation is included in the Core Strategy as recommended in the next column, and is successfully implemented:</p> <ul style="list-style-type: none"> • River Wye SAC • Wye Valley and Forest of Dean Bat Sites • Wye Valley Woodlands SAC 	<p>Mitigation required to avoid adverse effect on integrity:</p> <p>The implementation of good practice construction techniques should help to mitigate noise pollution effects resulting from new development in the vicinity of these sites.</p> <p>Recommendation for Core Strategy:</p> <p>The requirement for development to avoid adverse impacts from noise pollution (during both construction and operation) on these three sites should be included in the spatial options for Ross-on-Wye, Hereford and the Hereford Relief Road as development in these locations is particularly likely to give rise to adverse effects. However, as a number of more generalised policies that will lead to development may also lead to noise pollution, this requirement could also be included within policy NH.2 as a more generalised requirement for development.</p>
<p>Vibration</p> <p>Adverse effects on integrity due to vibration arising from E.1, E.2, GT.1, M.1, OS.2, SC.1, WI, RA.1, RA.5, H.1, H.2, H.3, H.4, H.5 and H.6 and the spatial option for Ross-on-Wye are not considered to occur in relation to the following sites, provided that mitigation is included in the Core Strategy as recommended in the next</p>	<p>Mitigation required to avoid adverse effect on integrity:</p> <p>The implementation of good practice construction techniques should help to mitigate vibration effects resulting from new development in the vicinity of these sites.</p> <p>Recommendation for Core Strategy:</p>

Potential adverse effect on European sites as a result of proposed policies in the Herefordshire Core Strategy	Mitigation, recommendations for the Herefordshire Core Strategy and next steps for the HRA
<p>column, and is successfully implemented:</p> <ul style="list-style-type: none"> • River Wye SAC • Wye Valley and Forest of Dean Bat Sites • Wye Valley Woodlands SAC 	<p>The requirement for development to avoid adverse impacts from vibration on these three sites should be included in the spatial options for Ross-on-Wye, Hereford and the Hereford Relief Road as development in these locations as development in this location is particularly likely to give rise to adverse effects. However, as a number of more generalised policies that will lead to development may also give rise to vibration effects, this requirement could also be included within policy NH.2 as a more generalised requirement for development.</p>
<p>Light pollution</p> <p>Adverse effects on integrity due to light pollution arising from E.1, E.2, GT.1, M.1, OS.2, SC.1, W1, RA.1, RA.5, H.1, H.2, H.3, H.4, H.5 and H.6 and the spatial option for Ross-on-Wye are not considered to occur in relation to the following sites, provided that mitigation is included in the Core Strategy as recommended in the next column, and is successfully implemented:</p> <ul style="list-style-type: none"> • River Wye SAC • Wye Valley and Forest of Dean Bat Sites • Wye Valley Woodlands SAC 	<p>Mitigation required to avoid adverse effect on integrity:</p> <p>The implementation of good practice construction techniques should help to mitigate light pollution effects resulting from new development in the vicinity of these sites.</p> <p>Light pollution effects on bats and otters may be partially mitigated by the use of appropriate street lighting and by the provision of high quality alternative habitat for roosting sites (e.g. good quality hedgerows) further away from development.</p> <p>Recommendation for Core Strategy:</p> <p>The requirement for development to avoid adverse impacts from light pollution on these three sites should be included in the spatial options for Ross-on-Wye, Hereford and the Hereford Relief Road as development in these locations as development in this location is particularly likely to give rise to adverse effects. In relation to the impacts on bats, the requirement to use appropriate street lighting and provide high quality alternative habitat for bat roosting sites (e.g. good quality hedgerows) further away from the development location should be specified. However, as a number of more generalised policies that will lead to development may also give rise to light pollution, this requirement could also be included within policy NH.2 as a</p>

Potential adverse effect on European sites as a result of proposed policies in the Herefordshire Core Strategy	Mitigation, recommendations for the Herefordshire Core Strategy and next steps for the HRA
	more generalised requirement for development.
<p>Air pollution</p> <p>Adverse effects on integrity uncertain, as a result of potential increased air pollution due to policies E.1, E.2, GT.1, M.1, W1, EC.1, EC.2, RA.1, RA.5, H.1, H.2, H.3, H.4, H.5 and H.6 on the following sites:</p> <ul style="list-style-type: none"> • Cwm Cladach Woodlands SAC • Downton Gorge SAC • Usk Bat Sites • Wye Valley Woodlands SAC 	<p>Mitigation required to avoid adverse effect on integrity:</p> <p>With respect to air pollution from traffic, the use of more fuel efficient vehicles may help to reduce overall emissions. In addition, a number of policies within the Core Strategy already seek to increase the use of sustainable transport modes (e.g. Sustainable Strategic Design LD.4 and the spatial options policies for Herefords and the Market Towns).</p> <p>In relation to waste management and agricultural activities that could result in increased emissions to air, 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, as regulated by the Environment Agency. The requirement to meet EP permitting 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.</p> <p>HRA next steps:</p> <p>Further information about forecast increases in traffic along the A465 and A466 into Herefordshire is required in order to make a more accurate judgement about the likelihood of adverse effects on these sites as a result of increased air pollution within the vicinity of these routes.</p> <p>Further analysis may then be necessary during the planning application stage, in order to determine whether adverse effects in terms of increased air pollution from an increase in nearby vehicle traffic are likely, once the precise location of development resulting from the Core Strategy proposals and the likely extent and location of increased vehicle movements is known. Similarly, analysis will</p>

Potential adverse effect on European sites as a result of proposed policies in the Herefordshire Core Strategy	Mitigation, recommendations for the Herefordshire Core Strategy and next steps for the HRA
	be required at this stage to determine the likelihood of air pollution effects resulting from developments, particularly agricultural workings and waste facilities.
<p>Physical damage/loss of habitat</p> <p>Adverse effects on integrity due to physical damage/loss of habitat arising from policies E.1, E.2, GT.1, M.1, OS.2, SC.1, WI, EC.1, EC.2, RA.1, RA.5, H.1 and H.2 and the spatial option for Ross-on-Wye are not considered to occur in relation to any of the 16 European sites within Herefordshire (+15km), provided that mitigation included in policy NH2 in the Core Strategy is successfully implemented:</p> <ul style="list-style-type: none"> • Downton Gorge SAC • River Clun SAC • River Wye SAC • Wye Valley Woodlands SAC 	<p>Mitigation required to avoid adverse effect on integrity:</p> <p>The Protection of Natural and Historic Assets policy (now split out into four separate policies which include landscape and biodiversity), should help to protect European sites from physical damage/loss of habitat.</p> <p>Assessment against policy NH.2 will be necessary during the planning application stage, in order to determine whether adverse effects in terms of physical loss/damage to habitat will occur, once the precise location of development resulting from each of the Core Strategy proposals is known.</p> <p>Recommendation for Core Strategy:</p> <p>The wording of policy NH.2 should be amended to specifically require all developments to avoid the loss or damage of sensitive European sites. The present wording states that sites of biological interest should be preserved 'where appropriate'; however this is not considered adequate to ensure that such effects will not arise.</p> <p>HRA next steps:</p> <p>Once the findings of the HRA of the Hereford Relief Road options are available, more certain conclusions can be reached with regards to whether the Hereford Movement Policy (which includes the proposed relief road) will have an adverse impact on the integrity of the River Wye SAC as a result of direct physical damage.</p>
<p>Recreation pressure</p> <p>Adverse effects on integrity due to recreation pressure arising from policies GT.1, EC.1, EC.2, RA.1, RA.5, H.1, H.3, H.4, H.5 and H.6 and the spatial policy for Ross-on-Wye are not considered to</p>	<p>Mitigation required to avoid adverse effect on integrity:</p> <p>The Open Space, Sport and Recreation and Green Infrastructure policies which are already included in the Core Strategy should help to mitigate any adverse impacts arising</p>

Potential adverse effect on European sites as a result of proposed policies in the Herefordshire Core Strategy	Mitigation, recommendations for the Herefordshire Core Strategy and next steps for the HRA
<p>occur in relation to the following sites, provided that mitigation is included in the Core Strategy as recommended in the next column, and is successfully implemented:</p> <ul style="list-style-type: none"> • River Clun SAC • River Wye SAC • Severn Estuary SAC • Sugar Loaf Woodlands SAC • Wye Valley and Forest of Dean Bat Sites SAC • Wye Valley Woodlands SAC • Severn Estuary SPA/Ramsar site • Walmore Common SPA/Ramsar site 	<p>from increased recreation use of these sites, through the provision of additional open space, recreation and green infrastructure which should help to alleviate pressures on European sites.</p>
<p>Interruption to hydrological regimes – water quantity</p> <p>Adverse effects on integrity uncertain, as a result of potential increased water abstraction due to policies E.1, E.2, EC.1, EC.2, RA.1, RA.5, H.1, H.3, H.4, H.5, H.6 and the spatial options for Bromyard, Ross-on-Wye and Leominster on the following sites:</p> <ul style="list-style-type: none"> • Coed y Cerrig SAC • Lyppard Grange Ponds SAC • Rhos Goch SAC • River Usk SAC • River Wye SAC • Severn Estuary SAC/SPA/Ramsar Site • Usk Bat Sites SAC • Walmore Common SPA/Ramsar Site 	<p>Mitigation required to avoid adverse effect on integrity:</p> <p>Water efficiency measures are required within all new development by policy WM.1 in the Core Strategy, which should help to reduce water abstraction requirements from new housing, employment and agricultural activities etc.</p> <p>HRA next steps:</p> <p>It is not possible to conclude that no adverse impact will result from the Core Strategy on these sites in terms of increased water abstraction until the Environment Agency has completed its Review of Consents work and Welsh Water has published its WRMP. When this work has been completed it will be necessary to determine the likelihood of such effects occurring.</p> <p>Herefordshire County Council should continue working with the Environment Agency and the water companies (Welsh Water and Severn Trent Water) in order to assess and address potential water abstraction issues in relation to the increases in housing provision needed during the plan period.</p>

Potential adverse effect on European sites as a result of proposed policies in the Herefordshire Core Strategy	Mitigation, recommendations for the Herefordshire Core Strategy and next steps for the HRA
<p>Water pollution</p> <p>Adverse effects on integrity likely to occur, as a result of potential inadequate water treatment capacity due to the spatial strategies for Leominster and Ross-on-Wye and policies H1, H3, H4, H5 and H6 on the following sites:</p> <ul style="list-style-type: none"> • River Wye SAC 	<p>Recommendation for Core Strategy:</p> <p>It is recommended that unless the necessary improvements to STW infrastructure and capacity can be achieved prior to delivery of the new housing in order to avoid adverse impacts arising from increased water pollution, then the allocated housing numbers for the towns of Hereford and Ross-on-Wye will need to be reviewed.</p> <p>Ensuring STW improvements occur prior to delivery of the housing requires consultation between Herefordshire Council, the Environment Agency and the relevant water companies (Welsh Water and Severn Trent Water), and this is partially addressed within the Infrastructure Contributions policy of the Core Strategy. Specific waste water infrastructure requirements should also be described as part of the implementation strategy for the spatial option policies relating to these towns.</p>

- 4.2 This draft HRA report, comprising both the Screening and Appropriate Assessment stages of assessment for all of the Core Strategy Preferred Options, will be sent to Natural England, Countryside Council for Wales, the Environment Agency and water companies for their consideration. A meeting between Herefordshire Council, Land Use Consultants and these consultees will also be held in November 2010 to discuss the uncertainties in relation to information and AA conclusions. Any comments and information received will be considered and addressed in the next iteration of the HRA of the draft submission version of the Core Strategy.
- 4.3 As the Preferred Options are taken forward and developed into final policies for inclusion in the Submission version of the Core Strategy, further assessment will be undertaken in order to determine whether these policies would result in adverse effects on the integrity of the European sites. If any of the policies vary significantly from the preferred options 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 Submission Version of the Core Strategy.

Land Use Consultants
10th November 2010

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Appendix I

Screening Matrix for Core Strategy Preferred Options

Core Strategy Preferred Option	Could the option have likely significant effects on European site(s)?	Likely activities (operations) to result as a consequence of the option	Likely effects if option implemented	Site(s) potentially affected	Potential mitigation measures to be considered through AA
Affordable Housing					
AH.1 Affordable housing	No: The proposal would not itself lead to development; instead it relates to criteria for development i.e. the proportion of affordable homes to be provided within overall housing development, the effects of which are assessed under other policies.	N/A	N/A	N/A	N/A
Employment					
E.1 Maintaining supply of employment land	Uncertain: The proposal would not itself result in development, as it relates to safeguarding existing and proposed employment allocations (the effects of which are considered in policy E2 below). However,	Employment-related development Increases in water supply and treatment Increased vehicle traffic Increase in emissions from development	Physical disturbance/damage Non-physical disturbance such as noise, vibration and light pollution Air pollution Interruption to	Uncertain at present, potentially any sites within the county may be affected.	N/A

Core Strategy Preferred Option	Could the option have likely significant effects on European site(s)?	Likely activities (operations) to result as a consequence of the option	Likely effects if option implemented	Site(s) potentially affected	Potential mitigation measures to be considered through AA
	<p>it does refer to the release of additional employment land where certain criteria are met, and this may lead to employment-related development in the vicinity of European sites. As well as the various physical and non-physical impacts that may result from development itself taking place, such as noise and light pollution, depending on the type of employment-related activities to take place, there may also be adverse impacts on air quality, both from increased traffic movements to and from the sites as well as from certain</p>		<p>hydrological regimes (e.g. from water abstraction or water pollution)</p>		

Core Strategy Preferred Option	Could the option have likely significant effects on European site(s)?	Likely activities (operations) to result as a consequence of the option	Likely effects if option implemented	Site(s) potentially affected	Potential mitigation measures to be considered through AA
	activities such as agricultural works.				
E.2 Employment land provision	Uncertain: The proposal may lead to employment-related development in the vicinity of European sites, but this is uncertain at present due to a lack of information about the precise location and scale of employment land provision. In addition to the potential direct physical impacts on sites, an increase in employment land provision may lead to an increase in vehicle trafficas well as increased requirements for water supply and treatment.	<p>Employment-related development</p> <p>Increases in water supply and treatment</p> <p>Increased vehicle traffic</p> <p>Increase in emissions from development</p>	<p>Physical disturbance/damage</p> <p>Non-physical disturbance such as noise, vibration and light pollution</p> <p>Air pollution</p> <p>Interruption to hydrological regimes (e.g. from water abstraction or water pollution)</p>	Uncertain at present, 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 employment land provision is to be focused.	<p>Sustainable transport links to and from employment sites may reduce the impacts of vehicle traffic.</p> <p>The measures included in the policies 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>
Gypsy and Traveller Sites					

Core Strategy Preferred Option	Could the option have likely significant effects on European site(s)?	Likely activities (operations) to result as a consequence of the option	Likely effects if option implemented	Site(s) potentially affected	Potential mitigation measures to be considered through AA
GT.1 Gypsy and traveller sites	Uncertain: If Gypsy and traveller sites are provided within close proximity of sensitive European sites there may be adverse impacts in terms of increased vehicle movements and pressure for recreation space; however this is uncertain due to a lack of information about the specific locations of sites to be provided.	Infrastructure development Increased recreation activities	Physical disturbance/damage Erosion/trampling Non-physical disturbance such as noise, vibration and light pollution Air pollution	Uncertain at present, 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, Coed y Cerrig and Rhos Goch SACs due to their closer proximity to Hereford, the Market Towns, Rural Service Centres and Hubs, and local centres, (where gypsy and traveller sites will be allowed within 5km of these towns and villages).	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 residential amenity should be provided. The measures included in the policies relating to open space, sport and recreation (OS.1-OS.3) may help to relieve any increase in pressure on European sites for recreation space, if appropriately implemented.
Local Distinctiveness (subsequently changed to Natural and Built Heritage Assets)					
NH.1 Landscape	No: The proposal is	N/A	N/A	N/A	N/A

Core Strategy Preferred Option	Could the option have likely significant effects on European site(s)?	Likely activities (operations) to result as a consequence of the option	Likely effects if option implemented	Site(s) potentially affected	Potential mitigation measures to be considered through AA
	designed to protect the natural environment, including landscape.				
NH.2 Biodiversity	No: The proposal is designed to protect the natural environment, including biodiversity.	N/A	N/A	N/A	This policy should help to mitigate potential effects of future development on designated sites, but more consideration of policy wording is needed.
NH.3 Built environment and streetscape	No: The proposal is designed to protect the built environment and streetscape.	N/A	N/A	N/A	N/A
NH.4 Archaeology	No: The proposal is designed to protect archaeological interests.	N/A	N/A	N/A	N/A
GI.1 Green infrastructure	No: The proposal is designed to protect the natural environment, including biodiversity.	N/A	N/A	N/A	This policy should help to mitigate potential effects of future development on designated sites but more

Core Strategy Preferred Option	Could the option have likely significant effects on European site(s)?	Likely activities (operations) to result as a consequence of the option	Likely effects if option implemented	Site(s) potentially affected	Potential mitigation measures to be considered through AA
					consideration of policy wording is needed.
Minerals					
MN.1: Minerals safeguarding areas	No: The proposal itself would not lead to development.	N/A	N/A	N/A	N/A
MN.2: Criteria for the assessment of minerals related development	No: The proposal aims to protect the natural environment, including biodiversity.	N/A	N/A	N/A	This policy should help to mitigate potential adverse effects from minerals development on designated sites but more consideration of policy wording is needed.
MN.3: Small-scale non-aggregate building stone and clay production	No: The proposal will not itself lead to development.	N/A	N/A	N/A	N/A
MN.4: Secondary (reused and recycled) aggregates	No: The proposal will not itself lead to development; whilst it also aims to protect the environment.	N/A	N/A	N/A	N/A

Core Strategy Preferred Option	Could the option have likely significant effects on European site(s)?	Likely activities (operations) to result as a consequence of the option	Likely effects if option implemented	Site(s) potentially affected	Potential mitigation measures to be considered through AA
MN.5: Moreton on Lugg railhead	No: The proposal will not itself lead to development.	N/A	N/A	N/A	N/A
MN6: Apportionments	No: The proposal will not itself lead to development.	N/A	N/A	N/A	N/A
Movement					
M.1: Movement	Yes: The proposal may result in infrastructure development, which may have an adverse effect if it were to be located in close proximity to sensitive European sites. In particular, the policy supports the provision of a Hereford Relief Road which, as detailed within policy H.2, will need to cross the River Wye SAC and so, as well as the potential physical damage to habitat and non-physical disturbance to	Infrastructure development Increase in vehicle traffic	Physical disturbance/damage Non-physical disturbance such as noise, vibration and light pollution Air pollution	Uncertain at present, potentially any sites within the county may be affected; however the River Wye SAC is expected to be affected by the provision of the Hereford Relief Road and also may be most likely to be affected by changes to the railway line between Hereford and Ledbury due to its proximity to the line. The route of the Leominster Southern Relief	Good practice construction techniques including noise suppression measures, hours of operation etc. may help to mitigate potential adverse effects, The measures included in policy LD.4: Sustainable Strategic Design may have some mitigation effects although the wording needs to be more closely considered.

Core Strategy Preferred Option	Could the option have likely significant effects on European site(s)?	Likely activities (operations) to result as a consequence of the option	Likely effects if option implemented	Site(s) potentially affected	Potential mitigation measures to be considered through AA
	qualifying species as a result of the development taking place, additional vehicle traffic and associated vibration, noise, air and light pollution is likely to affect the site.			Road which is also proposed under this policy is not yet known; however the only European site within reasonably close proximity of the town is the River Wye SAC which lies approximately 6km from the town centre.	
Open Space, Sport and Recreation					
OS.1: Open Space	No: The proposal aims to enhance open space within Herefordshire, and makes specific mention of the potential to benefits biodiversity by doing so.	N/A	N/A	N/A	N/A
OS.2: Sport and Recreation Facilities	Uncertain: Development of new sport and recreation facilities may have	Development of new sport and recreation facilities	Physical disturbance/damage Non-physical	Uncertain at present, potentially any sites within the county may be	Good practice construction techniques including noise suppression

Core Strategy Preferred Option	Could the option have likely significant effects on European site(s)?	Likely activities (operations) to result as a consequence of the option	Likely effects if option implemented	Site(s) potentially affected	Potential mitigation measures to be considered through AA
	adverse effects on any nearby European sites both during the construction phase and during operation. This is uncertain, due to a lack of information at this stage about the planned location, type and scale of any new facilities, something that would become clear at the planning application stage.		disturbance such as noise, vibration and light pollution	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.	measures, hours of operation etc. may help to mitigate potential adverse effects, The measures included in policy LD.4: Sustainable Strategic Design may have some mitigation effects although the wording needs to be more closely considered.
OS.3: Protection of Existing Sport and Recreation Facilities	No: The proposal itself will not lead to new development.	N/A	N/A	N/A	N/A
Social and Community Infrastructure					
SC.1: Social and Community Infrastructure	Uncertain: The proposal may result in the development of community facilities	Development of facilities and community infrastructure	Physical disturbance/damage Non-physical	Uncertain at present, potentially any sites within the county may be	Good practice construction techniques including noise suppression

Core Strategy Preferred Option	Could the option have likely significant effects on European site(s)?	Likely activities (operations) to result as a consequence of the option	Likely effects if option implemented	Site(s) potentially affected	Potential mitigation measures to be considered through AA
	and infrastructure, which may have adverse effects on any nearby European sites, but the likely impacts of such development are uncertain without more information about the precise type and location of any planned development. Development in and around Hereford is particularly likely as the policy specifies that development will take place to enhance the city's role as a 'university gateway'.		disturbance such as noise, vibration and light pollution	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.	measures, hours of operation etc. may help to mitigate potential adverse effects. The measures included in policy LD.4: Sustainable Strategic Design may have some mitigation effects although the wording needs to be more closely considered.
Waste					
W.I: Waste streams and targets	Uncertain: The proposal may lead to the construction of new waste management facilities, particularly in and around Hereford and	Development of waste facilities Increase in emissions from waste facilities	Physical disturbance/damage Non-physical disturbance such as noise, vibration and light pollution	Uncertain at present, potentially any sites within the county may be affected, but more likely to be River Wye SAC, Wye	Good practice construction techniques including noise suppression measures, hours of operation etc. may help to mitigate

Core Strategy Preferred Option	Could the option have likely significant effects on European site(s)?	Likely activities (operations) to result as a consequence of the option	Likely effects if option implemented	Site(s) potentially affected	Potential mitigation measures to be considered through AA
	the Market towns, although the likely impacts of this are unknown without precise information about the type, scale and location of such facilities. The development of new waste facilities may result in localised air pollution if the facilities incorporate thermal treatment.		Air pollution	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 waste management facilities is likely to be focused.	potential adverse effects. The measures included in policy LD.4: Sustainable Strategic Design may have some mitigation effects although the wording needs to be more closely considered.
W.2: Location of new waste facilities	No: The proposal will not itself lead to development; in addition it includes measures aiming to protect the natural environment.	N/A	N/A	N/A	This policy should help to mitigate potential effects from waste development on designated sites.
W.3: Existing and permitted waste treatment sites	No: The proposal will not itself lead to development.	N/A	N/A	N/A	N/A
W.4: Anaerobic Digesters	No: The proposal will not itself lead to	N/A	N/A	N/A	N/A

Core Strategy Preferred Option	Could the option have likely significant effects on European site(s)?	Likely activities (operations) to result as a consequence of the option	Likely effects if option implemented	Site(s) potentially affected	Potential mitigation measures to be considered through AA
	development.				
W.5: Waste minimisation and management in new developments	No: The proposal will not itself lead to development.	N/A	N/A	N/A	N/A
The Economy					
EC.1: Economy	Uncertain – the proposal seeks to focus most economic activities within urban areas, therefore is likely to direct 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	<p>Increase in recreation pressure</p> <p>Increase in vehicle traffic</p> <p>Increased water abstraction and treatment</p> <p>Increase in emissions from development</p>	<p>Physical disturbance/damage</p> <p>Air pollution</p> <p>Interruption to hydrological regimes</p>	Uncertain at present, 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	<p>The measures included in the policies relating to open space, sport and recreation (OS.1-OS.3) 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</p>

Core Strategy Preferred Option	Could the option have likely significant effects on European site(s)?	Likely activities (operations) to result as a consequence of the option	Likely effects if option implemented	Site(s) potentially affected	Potential mitigation measures to be considered through AA
	employment opportunities become more readily available, bringing with it associated pressures e.g. for recreation space and for water supply and treatment, and a further increase in vehicle movements.			to be focused.	additional pressure placed on the water supply as a result of population increases. The measures included in policy WM.1: Sustainable Water Management may have some mitigation effects although the wording needs to be more closely considered.
EC.2: Tourism	Uncertain – although the proposal emphasises the importance of environmental protection, an increase in tourism activities in Herefordshire is likely to lead to an increase in visitor pressure at sensitive European sites, which may cause	<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>	Uncertain at present, 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	The measures included in the policies relating to open space, sport and recreation (OS.1-OS.3) may help to relieve any increase in pressure on European sites for recreation space, if appropriately implemented.

Core Strategy Preferred Option	Could the option have likely significant effects on European site(s)?	Likely activities (operations) to result as a consequence of the option	Likely effects if option implemented	Site(s) potentially affected	Potential mitigation measures to be considered through AA
	damage such as erosion and trampling, and an increase in vehicle movements in the county. In addition, increasing the tourist population may increase pressure on the water supply, particularly in the summer months.			Hereford and the Market Towns, which are where a large proportion of the resulting development is likely to be focused.	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 population increases. The measures included in policy WM.1: Sustainable Water Management may have some mitigation effects although the wording needs to be more closely considered.
Sustainable Strategic Design					
LD.4: Sustainable Strategic Design	No: The proposal will not itself lead to development, instead it relates to criteria for development. In addition, the proposal	N/A	N/A	N/A	This policy should help to mitigate potential adverse effects of future development on designated sites,

Core Strategy Preferred Option	Could the option have likely significant effects on European site(s)?	Likely activities (operations) to result as a consequence of the option	Likely effects if option implemented	Site(s) potentially affected	Potential mitigation measures to be considered through AA
	includes measures aiming to protect the environment.				although the wording needs to be more closely considered.
Sustainable Water Management					
WM.1: Sustainable Water Management	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.	N/A	N/A	N/A	This policy should help to mitigate potential adverse effects of future development on designated sites, although the wording needs to be more closely considered.
Renewable Energy					
EN.1: Renewable Energy	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.	N/A	N/A	N/A	This policy should help to mitigate potential adverse effects of future development on designated sites, although the wording needs to be more closely considered.
Infrastructure Contributions					
ID.1: Infrastructure Contributions	No: The proposal will not itself lead to development, instead	N/A	N/A	N/A	N/A

Core Strategy Preferred Option	Could the option have likely significant effects on European site(s)?	Likely activities (operations) to result as a consequence of the option	Likely effects if option implemented	Site(s) potentially affected	Potential mitigation measures to be considered through AA
	it relates to criteria for how development will be funded, where the development would be required as a result of other policies.				
Rural Areas					
RA.1: Rural areas	Uncertain: The proposal allows for the development of a significant number of new dwellings within the county; however the likely impacts on sensitive European sites are unknown without more information about the planned location of the new dwellings. In addition, a notable increase in the local population may increase pressure for recreation space, which may affect	Housing development Increase in recreation activities Increase in vehicle traffic	Physical disturbance/damage Non-physical disturbance such as noise, vibration and light pollution Interruption to hydrological regimes. Air pollution	Uncertain at present, potentially any sites within the county may be affected.	Good practice construction techniques including noise suppression measures, hours of operation etc. may help to mitigate potential adverse effects. The measures included in policy LD.4: Sustainable Strategic Design may have some mitigation effects although the wording needs to be more closely considered

Core Strategy Preferred Option	Could the option have likely significant effects on European site(s)?	Likely activities (operations) to result as a consequence of the option	Likely effects if option implemented	Site(s) potentially affected	Potential mitigation measures to be considered through AA
	European sites depending on their proximity to housing development. Depending on the planned source of water supply for the new dwellings, there may be interruption to hydrological regimes at nearby European sites if levels of water abstraction were to increase in those locations.				The measures included in the policies relating to open space, sport and recreation (OS.1-OS.3) may help to relieve any increase in pressure on European sites for recreation space, if appropriately implemented.
RA.2: Rural service centres/hubs	No: The proposal will not itself lead to development. In addition, focussing development within existing settlements should help to direct activities away from sensitive European sites in the county.	N/A	N/A	N/A	N/A
RA.3: Other settlements	No: The proposal will not itself lead to	N/A	N/A	N/A	This policy should help to mitigate

Core Strategy Preferred Option	Could the option have likely significant effects on European site(s)?	Likely activities (operations) to result as a consequence of the option	Likely effects if option implemented	Site(s) potentially affected	Potential mitigation measures to be considered through AA
outside of the RSCs and hubs	development, instead it relates to criteria for development. In addition, the proposal includes measures aiming to protect the environment.				potential adverse effects of future development on designated sites, although the wording needs to be more closely considered.
RA.4: Open countryside	No: The proposal will not itself lead to development, instead it relates to criteria for development.	N/A	N/A	N/A	N/A
RA.5: Rural economy	Uncertain: The proposal may lead to employment/economic development, and depending on the nature, size and precise location of this development, there may be adverse impacts on sensitive European sites. In addition, the tourism-related proposals in particular may lead to increased recreation	Development for economic purposes e.g. employment sites Increase in vehicle traffic Increase in tourism/recreation activities Increased demand for water abstraction and treatment	Physical disturbance/damage Non-physical disturbance such as noise, vibration and light pollution Interruption to hydrological regimes Air pollution	Uncertain at present, potentially any sites within the county may be affected.	Good practice construction techniques including noise suppression measures, hours of operation etc. may help to mitigate potential adverse effects. The measures included in policy LD.4: Sustainable Strategic Design may have some mitigation effects although the

Core Strategy Preferred Option	Could the option have likely significant effects on European site(s)?	Likely activities (operations) to result as a consequence of the option	Likely effects if option implemented	Site(s) potentially affected	Potential mitigation measures to be considered through AA
	pressures at European sites, as could a general 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.	Increase in emissions from development			<p>wording needs to be more closely considered</p> <p>The measures included in the policies relating to open space, sport and recreation (OS.1-OS.3) 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>
Spatial Policy Options for Ledbury	Uncertain: The proposals for Ledbury make provision for development, but this is focused in and	Increased water abstraction and treatment	Interruption to hydrological regimes		Sufficient water treatment capacity at STW needs to be in place before new development occurs.

Core Strategy Preferred Option	Could the option have likely significant effects on European site(s)?	Likely activities (operations) to result as a consequence of the option	Likely effects if option implemented	Site(s) potentially affected	Potential mitigation measures to be considered through AA
	around the town which is located some distance away from any European sites, therefore physical loss is not expected. However, the proposal allows for the development of up to 1,700 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, depending on the planned source of water supply and treatment which is not known at this stage.				The measures included within policy WM.1: Sustainable Water Management may have positive effects for mitigation, although the wording needs to be more closely considered.
Spatial Policy Options for Bromyard	Uncertain: The proposals for Bromyard make provision for development, which	Housing and infrastructure development Increased water	Interruption to hydrological regimes	The River Frome is a tributary of the River Wye SAC, and these effects could combine with	Sufficient water treatment capacity at STW needs to be in place before new development occurs.

Core Strategy Preferred Option	Could the option have likely significant effects on European site(s)?	Likely activities (operations) to result as a consequence of the option	Likely effects if option implemented	Site(s) potentially affected	Potential mitigation measures to be considered through AA
	could affect water quality in the River Frome through increased pressure on sewage treatment works as a result of the expanding population. The River Frome is a tributary of the River Wye SAC, and these effects could combine with increased pressure on sewage treatment capacity discharging to the River Wye in association with development planned at Hereford and Ross-on-Wye, as discussed below.	abstraction and treatment		increased pressure on sewage treatment capacity discharging to the River Wye in association with development planned at Leominster, Hereford and Ross-on-Wye, as discussed above and below.	The measures included within policy WM.1: Sustainable Water Management may have positive effects for mitigation, although the wording needs to be more closely considered.
Spatial Policy Options for Ross-on-Wye	Uncertain: The proposals for Ross-on-Wye include the provision of 1,000 new homes, of which 450 have yet to be	Housing and infrastructure development Increase in recreation activities	Physical disturbance/damage Non-physical disturbance such as noise, vibration and	River Wye SAC (hydrological impacts) The sites most likely to be affected by an	Improved water efficiency measures, metering and addressing leakages in the supply may help to mitigate any

Core Strategy Preferred Option	Could the option have likely significant effects on European site(s)?	Likely activities (operations) to result as a consequence of the option	Likely effects if option implemented	Site(s) potentially affected	Potential mitigation measures to be considered through AA
	<p>built or allocated. Of these, 350 will be located in an urban extension within fairly close proximity of the River Wye SAC, and the remaining 100 will be provided at non-strategic sites within the existing urban area. 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 direct physical disturbance, it is possible that there may be adverse effects in terms of interruption to hydrological regimes at the site e.g. as a result of increased demand for water</p>	<p>Increase in vehicle traffic</p> <p>Increased water abstraction and treatment</p>	<p>light pollution</p> <p>Interruption to hydrological regimes</p>	<p>increase in recreation activities 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.</p>	<p>additional pressure placed on the water supply as a result of new housing development. The measures included in policy WM.1: Sustainable Water Management may have some mitigation effects although the wording needs to be more closely considered.</p>

Core Strategy Preferred Option	Could the option have likely significant effects on European site(s)?	Likely activities (operations) to result as a consequence of the option	Likely effects if option implemented	Site(s) potentially affected	Potential mitigation measures to be considered through AA
	abstraction and water treatment. This is uncertain at present; however, due to a lack of information about the proposed source of water supply for the new homes. There may also be impacts on other sites in relation to increasing the local population through housing development, for example in terms of increased recreation pressure on nearby sites.				
Spatial Option for Leominster (as included in the Place Shaping Paper, January 2010)	Uncertain – Although the location of the town indicates that direct physical damage to European sites from development will not occur, the development of 1,700 new homes at	Housing and infrastructure development Increase in recreation activities Increase in vehicle traffic	Physical disturbance Non-physical disturbance such as noise, vibration and light pollution Interruption to hydrological regimes	River Wye SAC	The measures included in the policies relating to open space, sport and recreation (OS.1-OS.3) may help to relieve any increase in pressure on European sites for

Core Strategy Preferred Option	Could the option have likely significant effects on European site(s)?	Likely activities (operations) to result as a consequence of the option	Likely effects if option implemented	Site(s) potentially affected	Potential mitigation measures to be considered through AA
	<p>Leominster may increase pressure for water abstraction and treatment, which may have an adverse impact on the Rivers Lugg and Arrow which are tributaries of the River Wye SAC. However, this is dependent on the planned source of water supply which is not known at this stage. The growing population may also result in increased pressure for recreation space around the town, including at the River Wye. In addition, the option allows for the development of the Leominster southern link road, which, dependent on the</p>	<p>Increased water abstraction and treatment</p>	<p>Air pollution</p>		<p>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 housing development. The measures included in policy WM.1: Sustainable Water Management may have some mitigation effects although the wording needs to be more closely considered.</p>

Core Strategy Preferred Option	Could the option have likely significant effects on European site(s)?	Likely activities (operations) to result as a consequence of the option	Likely effects if option implemented	Site(s) potentially affected	Potential mitigation measures to be considered through AA
	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.				
Hereford Policies					
H.1: Hereford City Centre Policy	Uncertain – The proposal allows for large-scale development within Hereford which will be located within reasonably close proximity of the River Wye. The population increase likely to result from the development of 800 new homes may result in increased pressure for recreation space and an increase in	Housing and infrastructure development Increase in recreation activities Increase in vehicle traffic Increased water abstraction and treatment	Physical disturbance/damage Non-physical disturbance such as noise, vibration and light pollution Interruption to hydrological regimes Air pollution	River Wye SAC	Good practice construction techniques including noise suppression measures, hours of operation etc. may help to mitigate potential adverse effects. The measures included in policy LD.4: Sustainable Strategic Design may have some mitigation effects although the wording needs to be

Core Strategy Preferred Option	Could the option have likely significant effects on European site(s)?	Likely activities (operations) to result as a consequence of the option	Likely effects if option implemented	Site(s) potentially affected	Potential mitigation measures to be considered through AA
	<p>vehicle traffic within and around the city, which may be compounded by the development of extensive new retail facilities. Depending on the planned source of water supply/ treatment for the new dwellings and other development there may also be interruption to hydrological regimes at nearby European sites if demand for water abstraction and/or treatment were to increase.</p>				<p>more closely considered.</p> <p>The measures included in the policies relating to open space, sport and recreation (OS.1-OS.3) 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 housing development. The</p>

Core Strategy Preferred Option	Could the option have likely significant effects on European site(s)?	Likely activities (operations) to result as a consequence of the option	Likely effects if option implemented	Site(s) potentially affected	Potential mitigation measures to be considered through AA
					measures included in policy WM.1: Sustainable Water Management may have some mitigation effects although the wording needs to be more closely considered.
H.2: Hereford Movement Policy	Yes – The proposal will result in the development of a relief road to the west of the City. This will need to cross the River Wye SAC and so, as well as the potential physical damage to habitat and non-physical disturbance to qualifying species as a result of the development taking place, additional vehicle traffic and associated vibration,	Infrastructure development Increased vehicle traffic directly adjacent to the River Wye SAC	Physical disturbance/damage Non-physical disturbance such as noise, vibration and light pollution Air pollution	River Wye SAC	Good practice construction techniques including noise suppression measures, hours of operation etc. may help to mitigate potential adverse effects. The measures included in policy LD.4: Sustainable Strategic Design may have some mitigation effects although the wording needs to be more closely considered

Core Strategy Preferred Option	Could the option have likely significant effects on European site(s)?	Likely activities (operations) to result as a consequence of the option	Likely effects if option implemented	Site(s) potentially affected	Potential mitigation measures to be considered through AA
	noise, air and light pollution is likely to affect the site.				The use of wide span structures may help to mitigate any direct physical impact on the site.
H.3: Growth Distribution Policy	Uncertain – The proposal allows for large-scale development around Hereford. Although none of the development sites are directly adjacent to or overlap with European sites, all lie within reasonably close proximity of the River Wye. The population increase likely to result from the development of 4,500 new homes may result in increased pressure for recreation space	Housing and infrastructure development Increase in recreation activities Increase in vehicle traffic Increased water abstraction and treatment	Non-physical disturbance such as noise, vibration and light pollution Air pollution Interruption to hydrological regimes	River Wye SAC	The measures included in the policies relating to open space, sport and recreation (OS.1-OS.3) 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

Core Strategy Preferred Option	Could the option have likely significant effects on European site(s)?	Likely activities (operations) to result as a consequence of the option	Likely effects if option implemented	Site(s) potentially affected	Potential mitigation measures to be considered through AA
	<p>and an increase vehicle traffic within and around the city. Depending on the planned source of water supply/ treatment for the new dwellings and other development, there may be interruption to hydrological regimes at nearby European sites if demand for water abstraction and/or treatment were to increase.</p>				<p>additional pressure placed on the water supply as a result of new housing development. The measures included in policy WM.1: Sustainable Water Management may have some mitigation effects although the wording needs to be more closely considered.</p> <p>Good practice construction techniques including noise suppression measures, hours of operation etc. may help to mitigate potential adverse effects. The measures included in policy LD.4: Sustainable Strategic</p>

Core Strategy Preferred Option	Could the option have likely significant effects on European site(s)?	Likely activities (operations) to result as a consequence of the option	Likely effects if option implemented	Site(s) potentially affected	Potential mitigation measures to be considered through AA
					Design may have some mitigation effects although the wording needs to be more closely considered.
H.4: Northern Urban Expansion	Uncertain – Although neither of the proposed development sites are directly adjacent to or overlap with European sites, they lie within reasonably close proximity of the River Wye. The population increase likely to result from the development of 1,000 new homes may result in increased pressure for recreation space and an increase vehicle traffic within and around the city. Depending on the planned source of	Housing and infrastructure development Increase in recreation activities Increase in vehicle traffic Increased water abstraction and treatment	Non-physical disturbance such as noise, vibration and light pollution Air pollution Interruption to hydrological regimes	River Wye SAC	The measures included in the policies relating to open space, sport and recreation (OS.1-OS.3) 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

Core Strategy Preferred Option	Could the option have likely significant effects on European site(s)?	Likely activities (operations) to result as a consequence of the option	Likely effects if option implemented	Site(s) potentially affected	Potential mitigation measures to be considered through AA
	<p>water supply/treatment for the new dwellings, there may be interruption to hydrological regimes at nearby European sites if demand for water abstraction and/or treatment were to increase.</p>				<p>supply as a result of new housing development. The measures included in policy WM.1: Sustainable Water Management may have some mitigation effects although the wording needs to be more closely considered.</p> <p>Good practice construction techniques including noise suppression measures, hours of operation etc. may help to mitigate potential adverse effects. The measures included in policy LD.4: Sustainable Strategic Design may have some mitigation</p>

Core Strategy Preferred Option	Could the option have likely significant effects on European site(s)?	Likely activities (operations) to result as a consequence of the option	Likely effects if option implemented	Site(s) potentially affected	Potential mitigation measures to be considered through AA
					effects although the wording needs to be more closely considered.
H.5: Western Urban Expansion	Uncertain – Although neither of the proposed development sites are directly adjacent to or overlap with European sites, they lie within reasonably close proximity of the River Wye. The population increase likely to result from the development of 2,500 new homes may result in increased pressure for recreation space and an increase vehicle traffic within and around the city. Depending on the planned source of water	Housing and infrastructure development Increase in recreation activities Increase in vehicle traffic Increased water abstraction and treatment	Non-physical disturbance such as noise, vibration and light pollution Interruption to hydrological regimes Air pollution	River Wye SAC	The measures included in the policies relating to open space, sport and recreation (OS.1-OS.3) 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

Core Strategy Preferred Option	Could the option have likely significant effects on European site(s)?	Likely activities (operations) to result as a consequence of the option	Likely effects if option implemented	Site(s) potentially affected	Potential mitigation measures to be considered through AA
	supply/treatment for the new dwellings, there may be interruption to hydrological regimes at nearby European sites if demand for water abstraction and/or treatment were to increase.				<p>new housing development. The measures included in policy WM.1: Sustainable Water Management may have some mitigation effects although the wording needs to be more closely considered.</p> <p>Good practice construction techniques including noise suppression measures, hours of operation etc. may help to mitigate potential adverse effects. The measures included in policy LD.4: Sustainable Strategic Design may have some mitigation effects although the</p>

Core Strategy Preferred Option	Could the option have likely significant effects on European site(s)?	Likely activities (operations) to result as a consequence of the option	Likely effects if option implemented	Site(s) potentially affected	Potential mitigation measures to be considered through AA
					wording needs to be more closely considered.
H.6: Southern Urban Expansion	Uncertain – Although neither of the proposed development sites are directly adjacent to or overlap with European sites, they lie within reasonably close proximity of the River Wye. The population increase likely to result from the development of 1,000 new homes may result in increased pressure for recreation space and an increase vehicle traffic within and around the city. Depending on the planned source of water supply/ treatment for the new	Housing and infrastructure development Increase in recreation activities Increase in vehicle traffic Increased water abstraction and treatment	Non-physical disturbance such as noise, vibration and light pollution Interruption to hydrological regimes Air pollution	River Wye SAC	The measures included in the policies relating to open space, sport and recreation (OS.1-OS.3) 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 housing

Core Strategy Preferred Option	Could the option have likely significant effects on European site(s)?	Likely activities (operations) to result as a consequence of the option	Likely effects if option implemented	Site(s) potentially affected	Potential mitigation measures to be considered through AA
	<p>dwelling, there may be interruption to hydrological regimes at nearby European sites if demand for water abstraction and/or treatment were to increase.</p>				<p>development. The measures included in policy WM.1: Sustainable Water Management may have some mitigation effects although the wording needs to be more closely considered.</p> <p>Good practice construction techniques including noise suppression measures, hours of operation etc. may help to mitigate potential adverse effects. The measures included in policy LD.4: Sustainable Strategic Design may have some mitigation effects although the wording needs to be</p>

Core Strategy Preferred Option	Could the option have likely significant effects on European site(s)?	Likely activities (operations) to result as a consequence of the option	Likely effects if option implemented	Site(s) potentially affected	Potential mitigation measures to be considered through AA
					more closely considered.

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Appendix 2

Appropriate Assessment Findings for Core Strategy Preferred Options

Key to colour coding: AA conclusions are colour coded green where no adverse effects on integrity will occur, orange where adverse effects are uncertain, and red where adverse effects will occur.

European site	Qualifying Features	Types of activities identified at the screening stage that may have an adverse impact on the integrity of European sites and policy option in Core Strategy identified as giving rise to the effect	Is an adverse effect on site integrity likely to result from any of the Preferred Options?	Recommendations for mitigating effects within the Core Strategy or further work for the HRA	If the recommendations are implemented, would it be possible that there would be no adverse effect on site integrity?
SACs					
<p>Coed y Cerrig</p>	<p>Annex I habitats that are a primary reason for site selection: Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (<i>Alno-padion</i>, <i>Alnion incanae</i>, <i>Salicion albae</i>) (priority feature) (considered to be one of the best areas in the UK).</p> <p>Conditions needed to support site integrity:</p> <ul style="list-style-type: none"> Maintain level of water table Maintain and monitor current management regime 	<p>Physical loss of habitat as a result of development (infrastructure, housing, employment, sport/recreation facilities or waste management facilities); noise, light and air pollution resulting from construction activities and/or an increase in vehicle traffic; erosion/trampling and noise pollution as a result of recreation pressures; and interruption to hydrological regimes as a result of increased demand for water abstraction and treatment.</p> <p>The following policy options were considered most likely to result in an adverse impact on this site:</p> <ul style="list-style-type: none"> GT.1 – physical disturbance/damage, non-physical disturbance and air pollution. <p>However, effects on this site</p>	<p>None of the Core Strategy Preferred Options proposals that were screened were considered likely to affect this site in particular; however a number of proposals could potentially affect any sites within the county, including this one. As such, any of the potential impacts identified at the screening stage may occur in the vicinity of the site, depending on the location in which any development arising from the proposals eventually occurs.</p> <p>Noise, vibration or light pollution resulting from construction activities will not affect alluvial forests, which are the main qualifying features of the site.</p> <p>Levels of acid deposition and nitrogen deposition at this site are already exceeding critical loads, indicating that an increase in air pollution as a result of increased vehicle traffic may be particularly harmful here. However, the only roads within 200m of the site are minor roads which are unlikely to see significant increases in traffic levels as a result of the Core Strategy proposals; therefore increased air pollution from road traffic is considered unlikely to affect the integrity of the site. The likelihood of other forms of air pollution having an adverse impact on this site will depend on the location of development such as waste facilities (incorporating thermal treatment) or agricultural works, which may result in air pollution, in relation to the site. This will not be known until the planning application stage. However, such air pollution would be localised to the development and as this site lies outside of the county boundary, and therefore some distance from any</p>		<p>Yes - the measures included in policy WM.1 should ensure that water efficiency measures are included in all types of new development, and that water resources are protected.</p>

European site	Qualifying Features	Types of activities identified at the screening stage that may have an adverse impact on the integrity of European sites and policy option in Core Strategy identified as giving rise to the effect	Is an adverse effect on site integrity likely to result from any of the Preferred Options?	Recommendations for mitigating effects within the Core Strategy or further work for the HRA	If the recommendations are implemented, would it be possible that there would be no adverse effect on site integrity?
		<p>may result from the following policy options which do not specify spatial locations for development:</p> <ul style="list-style-type: none"> • E.1 – physical disturbance/ damage, non-physical disturbance, air pollution and interruption to hydrological regimes. • E.2 - physical disturbance/ damage, non-physical disturbance, air pollution and interruption to hydrological regimes. • GT.1 - physical disturbance/ damage, non-physical disturbance and air pollution. • M.1 – physical disturbance/ damage and non-physical disturbance. • O.S2 - physical disturbance/ damage and non-physical disturbance. • SC.1 - physical disturbance/ damage and non-physical disturbance. • W.1 - physical disturbance/ damage and non-physical disturbance. • EC.1 - physical disturbance/ damage, air pollution and interruption 	<p>development that would result from the Core Strategy policies, it is considered unlikely that air pollution from development would have an adverse impact here.</p> <p>It is not likely that the Core Strategy proposals will result in physical loss of habitat at this site, due its distance from the outside of the county boundary – Core Strategy proposals will only result in development within Herefordshire itself.</p> <p>This SAC is small-sized, and is located some distance from the market towns of Herefordshire, therefore is less accessible than many other potential recreation sites in the county. As such, it is concluded that recreation pressures are unlikely to increase significantly at the site as a result of housing development proposed in the Core Strategy.</p> <p>It is uncertain at this stage whether housing development may occur within fairly close proximity of the site (e.g. if housing proposed under preferred option RA1 were to occur just inside of the south western part of the county boundary); however the site is particularly vulnerable to any interruption to hydrological regimes arising from altering the level of the water table, therefore development nearby that results in increased demand for water abstraction is likely to be particularly detrimental to the qualifying features of the site. According to the Environment Agency, it is unlikely to grant any new abstraction licences in any Water Resource Management Unit (WRMU) within Herefordshire as they are all currently at 'no water available' status. In addition, Welsh Water is not forecasting any supply deficits in Herefordshire aside from the Vowchurch WRMU which makes up only 2% of the county, and so it states that it can meet forecast growth without new or</p>		

European site	Qualifying Features	Types of activities identified at the screening stage that may have an adverse impact on the integrity of European sites and policy option in Core Strategy identified as giving rise to the effect	Is an adverse effect on site integrity likely to result from any of the Preferred Options?	Recommendations for mitigating effects within the Core Strategy or further work for the HRA	If the recommendations are implemented, would it be possible that there would be no adverse effect on site integrity?
		<p>to hydrological regimes.</p> <ul style="list-style-type: none"> • EC.2 - physical disturbance/ damage, air pollution and interruption to hydrological regimes. • RA.1 - physical disturbance/ damage, non-physical disturbance and interruption to hydrological regimes. • RA.5 - physical disturbance/ damage, non-physical disturbance and interruption to hydrological regimes. • Bromyard – interruption to hydrological regimes. • Ross-on-Wye - physical disturbance/ damage, non-physical disturbance and interruption to hydrological regimes. 	<p>increased abstraction licenses. However, this is dependent on the outcomes of the EA's Review of Consents work and Welsh Water is delaying the publication of its WRMP until this has been carried out. As such, it is not yet possible to rule out the possibility of water abstraction having an adverse impact on the integrity of this site.</p>		
Cwm Clydach Woodlands	<p>Annex I habitats that are a primary reason for site selection: <i>Asperulo-Fagetum</i> beech forests. Annex I habitats present as a qualifying feature, but not a primary reason for site selection: Atlantic acidophilous beech forests with <i>Ilex</i> and</p>	<p>Physical loss of habitat as a result of development (infrastructure, housing, employment, sport/recreation facilities or waste management facilities); noise, light and air pollution resulting from construction activities and/or an increase in vehicle traffic; Erosion/</p>	<p>None of the Core Strategy Preferred Options proposals that were screened were considered likely to affect this site in particular; however a number of proposals could potentially affect any sites within the county, including this one. As such, any of the potential impacts identified at the screening stage may occur in the vicinity of the site, depending on the location in which any development arising from the proposals eventually occurs.</p> <p>Any light pollution, noise or vibration resulting from</p>	<p>Further information about forecast increases in traffic along the A465 into Herefordshire is required.</p>	<p>Uncertain at this stage.</p>

European site	Qualifying Features	Types of activities identified at the screening stage that may have an adverse impact on the integrity of European sites and policy option in Core Strategy identified as giving rise to the effect	Is an adverse effect on site integrity likely to result from any of the Preferred Options?	Recommendations for mitigating effects within the Core Strategy or further work for the HRA	If the recommendations are implemented, would it be possible that there would be no adverse effect on site integrity?
	<p>sometimes also <i>Taxus</i> in the shrub layer (<i>Quercion robori-petraeae</i> or <i>Ilici-Fagenion</i>) (which is considered to be one of the best areas in the UK).</p> <p>Conditions needed to support site integrity:</p> <ul style="list-style-type: none"> • No loss in extent of ancient semi-natural woodland • Monitor and control grazing levels • Limit recreational pressure 	<p>trampling and noise pollution as a result of recreation pressures; and interruption to hydrological regimes as a result of increased demand for water abstraction and treatment.</p> <p>None of the policy options were considered likely to result in an adverse impact on this site in particular.</p> <p>However, effects on this site may result from the following policy options which do not specify spatial locations for development:</p> <ul style="list-style-type: none"> • E.1 – physical disturbance/ damage, non-physical disturbance, air pollution and interruption to hydrological regimes. • E.2 - physical disturbance/ damage, non-physical disturbance, air pollution and interruption to hydrological regimes. • GT.1 - physical disturbance/ damage, non-physical disturbance and air pollution. 	<p>construction activities will not affect trees, which are the main qualifying features of the site.</p> <p>Levels of acid and nitrogen deposition at this site are already exceeding critical loads; therefore air pollution resulting from increased vehicle traffic in the vicinity of the site may be particularly harmful. In addition, a main road (the A465) runs directly adjacent to the site, within 200m. However, information from the INCC indicates that airborne acid and nutrient deposition are not a significant threat at the site due to the woodland soils being well-buffered and nutrient-rich. The site is not close to any planned large locations for new housing in Herefordshire; therefore it is unlikely that increased air pollution from planned development in Herefordshire alone would impact on the qualifying features of the site. However, the potential for increased air pollution associated with any increased car travel between Merthyr Tydfil, Abergavenny and Hereford along the A465 (due to increased employment provision and opportunities in Hereford) needs to be considered. The likelihood of other forms of air pollution having an adverse impact on this site will depend on the location of development such as waste facilities (incorporating thermal treatment) or agricultural works, which may result in air pollution, in relation to the site. This will not be known until the planning application stage. However, such air pollution would be localised to the development and as this site lies outside of the county boundary, and therefore some distance from any development that would result from the Core Strategy policies, it is not likely that air pollution from development would have an adverse impact here.</p> <p>It is not likely that the Core Strategy proposals will result in</p>		

European site	Qualifying Features	Types of activities identified at the screening stage that may have an adverse impact on the integrity of European sites and policy option in Core Strategy identified as giving rise to the effect	Is an adverse effect on site integrity likely to result from any of the Preferred Options?	Recommendations for mitigating effects within the Core Strategy or further work for the HRA	If the recommendations are implemented, would it be possible that there would be no adverse effect on site integrity?
		<ul style="list-style-type: none"> • M.1 – physical disturbance/ damage and non-physical disturbance. • O.S2 - physical disturbance/ damage and non-physical disturbance. • SC.1 - physical disturbance/ damage and non-physical disturbance. • W.1 - physical disturbance/ damage and non-physical disturbance. • EC.1 - physical disturbance/ damage, air pollution and interruption to hydrological regimes. • EC.2 - physical disturbance/ damage, air pollution and interruption to hydrological regimes. • RA.1 - physical disturbance/ damage, non-physical disturbance and interruption to hydrological regimes. • RA.5 - physical disturbance/ damage, non-physical disturbance and interruption to hydrological regimes. • Bromyard – interruption to hydrological regimes. 	<p>physical loss of habitat at this site, due its distance from the outside of the county boundary – Core Strategy proposals will only result in development within Herefordshire itself.</p> <p>This site is small-sized, and is located some distance from the market towns of Herefordshire, therefore is less accessible than many other potential recreation sites in the county. As such, it is concluded that recreation pressures are unlikely to increase significantly at the site as a result of housing development within the county.</p> <p>The integrity of this site is not likely to be significantly adversely affected by changes to hydrological regimes as the qualifying features are not especially vulnerable to changes in water quality or quantity.</p>		

European site	Qualifying Features	Types of activities identified at the screening stage that may have an adverse impact on the integrity of European sites and policy option in Core Strategy identified as giving rise to the effect	Is an adverse effect on site integrity likely to result from any of the Preferred Options?	Recommendations for mitigating effects within the Core Strategy or further work for the HRA	If the recommendations are implemented, would it be possible that there would be no adverse effect on site integrity?
		<ul style="list-style-type: none"> Ross-on-Wye - physical disturbance/ damage, non-physical disturbance and interruption to hydrological regimes. 			
Downton Gorge	<p>Annex I habitats that are a primary reason for site selection: <i>Tilio-Acerion forests</i> of slopes, screes and ravines (priority feature) (considered to be one of the best areas in the UK).</p> <p>Conditions needed to support site integrity:</p> <ul style="list-style-type: none"> Maintain current management regime Monitoring and control of air and water borne pollution 	<p>Physical loss of habitat as a result of development (infrastructure, housing, employment, sport/recreation facilities or waste management facilities); noise, light and air pollution resulting from construction activities and/or an increase in vehicle traffic; Erosion/ trampling and noise pollution as a result of recreation pressures; and interruption to hydrological regimes as a result of increased demand for water abstraction and treatment.</p> <p>None of the policy options were considered likely to result in an adverse impact on this site in particular.</p> <p>However, effects on this site may result from the following policy options which do not</p>	<p>None of the Core Strategy Preferred Options proposals that were screened were considered likely to affect this site in particular; however a number of proposals could potentially affect any sites within the county, including this one. As such, any of the potential impacts identified at the screening stage may occur in the vicinity of the site, depending on the location in which any development arising from the proposals eventually occurs.</p> <p>Any light pollution, noise or vibration resulting from construction activities will not affect trees, which are the main qualifying features of the site.</p> <p>Air pollution is a particular threat at this site due to its significant lichenological interest. Any proposal that results in an increase in vehicle traffic in the vicinity of this site may therefore have significant adverse effects on site integrity. Current levels of air pollution at this site are unknown, so it is not clear at this stage whether critical loads are already being exceeded, and therefore how likely it is that any increases may be significantly damaging. However, only minor roads are located within 200m of the site, which are unlikely to see significant increases in traffic volumes as a result of Core Strategy proposals. As such, it is considered unlikely that an increase in air pollution from road traffic will affect this site. The likelihood of other forms of air pollution having an adverse impact on this site will depend on the</p>	<p>Further analysis is necessary during the planning application stage, in order to determine whether adverse effects in terms of physical loss/damage to habitat will occur, once the precise location of development resulting from the Core Strategy proposals is known.</p> <p>The Protection of Natural and Historic Assets policy (now split out into four separate policies including landscape and biodiversity), should help to ensure this analysis takes place at the planning application stage.</p>	<p>Yes, mitigation provided by policy NH2 should ensure that future development does not result in physical damage or loss to the habitat of this site, or in damage from increased air pollution.</p>

European site	Qualifying Features	Types of activities identified at the screening stage that may have an adverse impact on the integrity of European sites and policy option in Core Strategy identified as giving rise to the effect	Is an adverse effect on site integrity likely to result from any of the Preferred Options?	Recommendations for mitigating effects within the Core Strategy or further work for the HRA	If the recommendations are implemented, would it be possible that there would be no adverse effect on site integrity?
		<p>specify spatial locations for development:</p> <ul style="list-style-type: none"> • E.1 – physical disturbance/ damage, non-physical disturbance, air pollution and interruption to hydrological regimes. • E.2 - physical disturbance/ damage, non-physical disturbance, air pollution and interruption to hydrological regimes. • GT.1 - physical disturbance/ damage, non-physical disturbance and air pollution. • M.1 – physical disturbance/ damage and non-physical disturbance. • O.S2 - physical disturbance/ damage and non-physical disturbance. • SC.1 - physical disturbance/ damage and non-physical disturbance. • W.1 - physical disturbance/ damage and non-physical disturbance. • EC.1 - physical disturbance/ damage, air pollution and interruption to hydrological regimes. • EC.2 - physical 	<p>location of development such as waste facilities (incorporating thermal treatment) or agricultural works, which may result in air pollution, in relation to the site. This will not be known until the planning application stage. However, such air pollution would be localised and for those spatial options where the proposed locations for development have been indicated, none is proposed within close proximity of this site.</p> <p>It is not possible at this stage to make a judgement about the likelihood of there being any physical loss of habitat, due to a lack of information about the precise location of development proposed. Any development resulting from the preferred options for the general policies will be assessed at the planning application stage for its potential to result in habitat damage/loss. However, for the spatial options where the proposed locations for development have been indicated, none is proposed within close proximity of this site.</p> <p>This site is small-sized, and is located some distance from the nearest market towns, therefore is less accessible than many other potential recreation sites in the county. As such, it is concluded that recreation pressures are unlikely to increase significantly at the site as a result of housing development within the county.</p> <p>Water pollution is a particular threat at this site due to its significant lichenological interest. As such, any nearby development that may result in an increased demand for water treatment may adversely affect the integrity of the site. However, none of the sewage treatment works that serve the settlements within Herefordshire were found to discharge at this site; therefore development nearby is not</p>		

European site	Qualifying Features	Types of activities identified at the screening stage that may have an adverse impact on the integrity of European sites and policy option in Core Strategy identified as giving rise to the effect	Is an adverse effect on site integrity likely to result from any of the Preferred Options?	Recommendations for mitigating effects within the Core Strategy or further work for the HRA	If the recommendations are implemented, would it be possible that there would be no adverse effect on site integrity?
		<p>disturbance/ damage, air pollution and interruption to hydrological regimes.</p> <ul style="list-style-type: none"> • RA.1 - physical disturbance/ damage, non-physical disturbance and interruption to hydrological regimes. • RA.5 - physical disturbance/ damage, non-physical disturbance and interruption to hydrological regimes. • Bromyard – interruption to hydrological regimes. • Ross-on-Wye - physical disturbance/ damage, non-physical disturbance and interruption to hydrological regimes. 	<p>considered likely to have an adverse effect on site integrity as a result of increasing water pollution levels.</p>		
Llangorse Lake	<p>Annex I habitats of primary reason for designation: Natural eutrophic lakes with <i>Magnopotamion</i> or <i>Hydrochartition</i>-type vegetation (which is considered to be one of the best areas in the UK)</p> <p>Conditions needed to</p>	<p>Physical loss of habitat as a result of development (infrastructure, housing, employment, sport/recreation facilities or waste management facilities); noise, light and air pollution resulting from construction activities and/or an increase in vehicle traffic; Erosion/ trampling and noise</p>	<p>None of the Core Strategy Preferred Options proposals that were screened were considered likely to affect this site in particular; however a number of proposals could potentially affect any sites within the county, including this one. As such, any of the potential impacts identified at the screening stage may occur in the vicinity of the site, depending on the location in which any development arising from the proposals eventually occurs.</p> <p>Any light pollution, noise or vibration resulting from construction activities will not affect the eutrophic lake</p>	N/A	N/A

European site	Qualifying Features	Types of activities identified at the screening stage that may have an adverse impact on the integrity of European sites and policy option in Core Strategy identified as giving rise to the effect	Is an adverse effect on site integrity likely to result from any of the Preferred Options?	Recommendations for mitigating effects within the Core Strategy or further work for the HRA	If the recommendations are implemented, would it be possible that there would be no adverse effect on site integrity?
	<p>support site integrity:</p> <ul style="list-style-type: none"> Control of recreational activities Monitor and maintain water quality 	<p>pollution as a result of recreation pressures; and interruption to hydrological regimes as a result of increased demand for water abstraction and treatment.</p> <p>None of the policy options were considered likely to result in an adverse impact on this site in particular.</p> <p>However, effects on this site may result from the following policy options which do not specify spatial locations for development:</p> <ul style="list-style-type: none"> E.1 – physical disturbance/ damage, non-physical disturbance, air pollution and interruption to hydrological regimes. E.2 - physical disturbance/ damage, non-physical disturbance, air pollution and interruption to hydrological regimes. GT.1 - physical disturbance/ damage, non-physical disturbance and air pollution. M.1 – physical disturbance/ 	<p>habitat which is the qualifying feature of the site.</p> <p>No information is available regarding current levels of air pollution at this site; therefore it is uncertain whether any increases resulting from development would have a detrimental effect on site integrity. However, all of the roads that lie within 200m of the site are minor roads which are unlikely to see significant increases in vehicle traffic as a result of Core Strategy proposals. Therefore it is considered unlikely that an increase in air pollution from road traffic is likely to affect this site. The likelihood of other forms of air pollution having an adverse impact on this site will depend on the location of development such as waste facilities (incorporating thermal treatment) or agricultural works, which may result in air pollution, in relation to the site. This will not be known until the planning application stage. However, such air pollution would be localised to the development and as this site lies outside of the county boundary, and therefore some distance from any development that would result from the Core Strategy policies, it is not likely that air pollution from development would have an adverse impact here.</p> <p>It is not likely that the Core Strategy proposals will result in physical loss of habitat at this site, due its distance from the outside of the county boundary – Core Strategy proposals will only result in development within Herefordshire itself.</p> <p>The qualifying features of this site are particularly vulnerable to the effects of recreation activities; therefore any development which may result in an increase in amenity use of the site is likely to have an adverse effect on site integrity. However, the site is small sized and is located some distance</p>		

European site	Qualifying Features	Types of activities identified at the screening stage that may have an adverse impact on the integrity of European sites and policy option in Core Strategy identified as giving rise to the effect	Is an adverse effect on site integrity likely to result from any of the Preferred Options?	Recommendations for mitigating effects within the Core Strategy or further work for the HRA	If the recommendations are implemented, would it be possible that there would be no adverse effect on site integrity?
		<p>damage and non-physical disturbance.</p> <ul style="list-style-type: none"> • O.S2 - physical disturbance/ damage and non-physical disturbance. • SC.1 - physical disturbance/ damage and non-physical disturbance. • W.1 - physical disturbance/ damage and non-physical disturbance. • EC.1 - physical disturbance/ damage, air pollution and interruption to hydrological regimes. • EC.2 - physical disturbance/ damage, air pollution and interruption to hydrological regimes. • RA.1 - physical disturbance/ damage, non-physical disturbance and interruption to hydrological regimes. • RA.5 - physical disturbance/ damage, non-physical disturbance and interruption to hydrological regimes. • Bromyard – interruption to hydrological regimes. • Ross-on-Wye - physical disturbance/ damage, non- 	<p>away from the main settlements in Herefordshire, therefore it is concluded that recreation pressures are unlikely to increase significantly at the site as a result of housing development within the county.</p> <p>Water quality is of particular importance to this site, therefore any development that may interrupt hydrological regimes through increased demand for water treatment may have a significant adverse effect on site integrity. However, none of the sewage treatment works that serve the settlements within Herefordshire were found to discharge at this site; therefore development in the vicinity of the site is not likely to have an adverse effect on site integrity as a result of increasing water pollution levels.</p>		

European site	Qualifying Features	Types of activities identified at the screening stage that may have an adverse impact on the integrity of European sites and policy option in Core Strategy identified as giving rise to the effect	Is an adverse effect on site integrity likely to result from any of the Preferred Options?	Recommendations for mitigating effects within the Core Strategy or further work for the HRA	If the recommendations are implemented, would it be possible that there would be no adverse effect on site integrity?
		physical disturbance and interruption to hydrological regimes.			
Lyppard Grange Ponds	<p>Annex II species that are a primary reason for site selection: Great crested newt <i>Triturus cristatus</i> (101- 250 residents) (considered to be one of the best areas in the UK)</p> <p>Conditions needed to support site integrity:</p> <ul style="list-style-type: none"> • Continue implementation and monitor management plan • Control of recreational activities and human influence and disturbance 	<p>Physical loss of habitat as a result of development (infrastructure, housing, employment, sport/recreation facilities or waste management facilities); noise, light and air pollution resulting from construction activities and/or an increase in vehicle traffic; Erosion/trampling and noise pollution as a result of recreation pressures; and interruption to hydrological regimes as a result of increased demand for water abstraction and treatment.</p> <p>None of the policy options were considered likely to result in an adverse impact on this site in particular.</p> <p>However, effects on this site may result from the following policy options which do not specify spatial locations for development:</p>	<p>None of the Core Strategy Preferred Options proposals that were screened were considered likely to affect this site in particular; however a number of proposals could potentially affect any sites within the county, including this one. As such, any of the potential impacts identified at the screening stage may occur in the vicinity of the site, depending on the location in which any development arising from the proposals eventually occurs.</p> <p>Light and air pollution are not considered likely to have an adverse effect on the qualifying features of this site.</p> <p>Noise pollution and vibration may have an adverse impact on the otters which are a qualifying feature of the site; however the distance of the site from the county boundary indicates that noise and vibration from development within Herefordshire will not be transmitted to this site.</p> <p>It is not likely that the Core Strategy proposals will result in physical loss of habitat at this site, due its distance from the outside of the county boundary – Core Strategy proposals will only result in development within Herefordshire itself.</p> <p>The Great Crested Newt present at this site is particularly vulnerable to the effects of human activity; therefore any proposals likely to result in increased recreation activities at this site are likely to have adverse effects on site integrity. However, the site is located at the far edge of the 15km buffer around Herefordshire and is relatively far less</p>		<p>Yes - the measures included in policy WM.1 should ensure that water efficiency measures are included in all types of new development, and that water resources are protected.</p>

European site	Qualifying Features	Types of activities identified at the screening stage that may have an adverse impact on the integrity of European sites and policy option in Core Strategy identified as giving rise to the effect	Is an adverse effect on site integrity likely to result from any of the Preferred Options?	Recommendations for mitigating effects within the Core Strategy or further work for the HRA	If the recommendations are implemented, would it be possible that there would be no adverse effect on site integrity?
		<ul style="list-style-type: none"> • E.1 – physical disturbance/ damage, non-physical disturbance, air pollution and interruption to hydrological regimes. • E.2 - physical disturbance/ damage, non-physical disturbance, air pollution and interruption to hydrological regimes. • GT.1 - physical disturbance/ damage, non-physical disturbance and air pollution. • M.1 – physical disturbance/ damage and non-physical disturbance. • O.S2 - physical disturbance/ damage and non-physical disturbance. • SC.1 - physical disturbance/ damage and non-physical disturbance. • W.1 - physical disturbance/ damage and non-physical disturbance. • EC.1 - physical disturbance/ damage, air pollution and interruption to hydrological regimes. • EC.2 - physical disturbance/ damage, air pollution and interruption 	<p>accessible from the main settlements in the county than other potential recreation sites in and around Herefordshire. As such, it is not considered likely that the development proposed in the Core Strategy will lead to any significant increase in recreation pressure here.</p> <p>The aquatic nature of this site means that it is particularly vulnerable to changes in water quantity/quality; therefore any nearby development that may lead to increased demand for water abstraction/treatment is likely to have a significant adverse effect on site integrity. However, none of the sewage treatment works that serve the settlements within Herefordshire were found to discharge at this site; therefore development nearby is not considered likely to have an adverse effect on site integrity as a result of increasing water pollution levels. It is uncertain at this stage whether housing development may occur within fairly close proximity of the site (e.g. housing proposed under preferred option RA1); however the site is particularly vulnerable to any increase in water abstraction. According to the Environment Agency, it is unlikely to grant any new abstraction licences in any Water Resource Management Unit (WRMU) within Herefordshire as they are all currently at 'no water available' status. In addition, Welsh Water is not forecasting any supply deficits in Herefordshire aside from the Vowchurch WRMU which makes up only 2% of the county, and so it states that it can meet forecast growth without new or increased abstraction licenses. However, this is dependent on the outcomes of the EA's Review of Consents work and Welsh Water is delaying the publication of its WRMP until this has been carried out. As such, it is not yet possible to rule out the possibility of water abstraction having an adverse impact on the integrity of this site.</p>		

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		<p>to hydrological regimes.</p> <ul style="list-style-type: none"> • RA.1 - physical disturbance/ damage, non-physical disturbance and interruption to hydrological regimes. • RA.5 - physical disturbance/ damage, non-physical disturbance and interruption to hydrological regimes. • Bromyard – interruption to hydrological regimes. • Ross-on-Wye - physical disturbance/ damage, non-physical disturbance and interruption to hydrological regimes. 			
Rhos Goch	Annex I habitats of primary reason for selection: Active raised bogs (priority feature) (considered to be one of the best areas in the UK), transition mires and quaking bogs (considered to be one of the best areas in the UK). Annex I habitats present as a qualifying feature, but not a primary reason for site selection: Molinia	Physical loss of habitat as a result of development (infrastructure, housing, employment, sport/recreation facilities or waste management facilities); noise, light and air pollution resulting from construction activities and/or an increase in vehicle traffic; Erosion/ trampling and noise pollution as a result of recreation pressures; and interruption to	None of the Core Strategy Preferred Options proposals that were screened were considered likely to affect this site in particular; however a number of proposals could potentially affect any sites within the county, including this one. As such, any of the potential impacts identified at the screening stage may occur in the vicinity of the site, depending on the location in which any development arising from the proposals eventually occurs. Any light pollution, noise or vibration resulting from construction activities will not affect bogs, meadows or woodland, which are the main qualifying features of the site. Levels of acid deposition and nitrogen deposition are already		Yes - the measures included in policy WM.1 should ensure that water efficiency measures are included in all types of new development, and that water resources are protected.

European site	Qualifying Features	Types of activities identified at the screening stage that may have an adverse impact on the integrity of European sites and policy option in Core Strategy identified as giving rise to the effect	Is an adverse effect on site integrity likely to result from any of the Preferred Options?	Recommendations for mitigating effects within the Core Strategy or further work for the HRA	If the recommendations are implemented, would it be possible that there would be no adverse effect on site integrity?
	<p>meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinion caeruleae</i>) (the area is considered to support a significant presence), bog woodland (priority feature) (considered to be rare as its total extent in the UK is estimated to be less than 1000ha and the area is considered to support a significant presence), alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (<i>Alno-Padion</i>, <i>Alnion incanae</i>, <i>Salicion albae</i>) (priority feature) (the area is considered to support a significant presence).</p> <p>Conditions needed to support site integrity:</p> <ul style="list-style-type: none"> • Maintain water table levels • Grazing and management regime • Control of succession 	<p>hydrological regimes as a result of increased demand for water abstraction and treatment.</p> <p>The following policy options were considered most likely to result in an adverse impact on this site:</p> <ul style="list-style-type: none"> • GT.1 – physical disturbance/damage, non-physical disturbance and air pollution. <p>However, effects on this site may result from the following policy options which do not specify spatial locations for development:</p> <ul style="list-style-type: none"> • E.1 – physical disturbance/ damage, non-physical disturbance, air pollution and interruption to hydrological regimes. • E.2 - physical disturbance/ damage, non-physical disturbance, air pollution and interruption to hydrological regimes. • GT.1 - physical disturbance/ damage, non-physical disturbance and air 	<p>exceeding critical loads at this site, and bog habitats are particularly vulnerable to nitrogen increases in terms of their plant species composition. As such, any further increases in air pollution as a result of development may be particularly detrimental to the integrity of this site. However, no primary roads are present within 200m of the site, only minor roads, which are considered unlikely to see significant increases in vehicle traffic as a result of Core Strategy proposals. Therefore it is considered unlikely that an increase in air pollution from road traffic is likely to affect this site. The likelihood of other forms of air pollution having an adverse impact on this site will depend on the location of development such as waste facilities (incorporating thermal treatment) or agricultural works, which may result in air pollution, in relation to the site. This will not be known until the planning application stage. However, such air pollution would be localised to the development and as this site lies outside of the county boundary, and therefore some distance from any development that would result from the Core Strategy policies, it is not likely that air pollution from development would have an adverse impact here.</p> <p>It is not likely that the Core Strategy proposals will result in physical loss of habitat at this site, due its distance from the outside of the county boundary – Core Strategy proposals will only result in development within Herefordshire itself.</p> <p>This site is small-sized, and is located some distance from the nearest market towns, therefore is less accessible than many other potential recreation sites in the county. As such, it is concluded that recreation pressures are unlikely to increase significantly at the site as a result of housing development within the county.</p>		

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		<p>pollution.</p> <ul style="list-style-type: none"> • M.1 – physical disturbance/ damage and non-physical disturbance. • O.S2 - physical disturbance/ damage and non-physical disturbance. • SC.1 - physical disturbance/ damage and non-physical disturbance. • W.1 - physical disturbance/ damage and non-physical disturbance. • EC.1 - physical disturbance/ damage, air pollution and interruption to hydrological regimes. • EC.2 - physical disturbance/ damage, air pollution and interruption to hydrological regimes. • RA.1 - physical disturbance/ damage, non-physical disturbance and interruption to hydrological regimes. • RA.5 - physical disturbance/ damage, non-physical disturbance and interruption to hydrological regimes. • Bromyard – interruption to hydrological regimes. 	<p>It is uncertain at this stage whether housing development may occur in the vicinity of the site (e.g. under preferred option RA1); however the site is particularly vulnerable to any interruption to hydrological regimes in the form of a falling water table, therefore development nearby that results in increased demand for water abstraction is likely to be particularly detrimental to the qualifying features of the site. According to the Environment Agency, it is unlikely to grant any new abstraction licences in any Water Resource Management Unit (WRMU) within Herefordshire as they are all currently at 'no water available' status. In addition, Welsh Water is not forecasting any supply deficits in Herefordshire aside from the Vowchurch WRMU which makes up only 2% of the county, and so it states that it can meet forecast growth without new or increased abstraction licenses. However, this is dependent on the outcomes of the EA's Review of Consents work and Welsh Water is delaying the publication of its WRMP until this has been carried out. As such, it is not yet possible to rule out the possibility of water abstraction having an adverse impact on the integrity of this site.</p>		

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		<ul style="list-style-type: none"> Ross-on-Wye - physical disturbance/ damage, non-physical disturbance and interruption to hydrological regimes. 			
River Clun	<p>Annex II species present as a qualifying feature, but not a primary reason for site selection:</p> <p>Freshwater pearl mussel <i>Margaritifera margaritifera</i> (considered to support a significant presence).</p> <p>Conditions needed to support site integrity:</p> <ul style="list-style-type: none"> Maintenance of good water quality (limit pollution and sedimentation, particularly from agricultural run-off) Maintenance of salmonid populations Maintain riparian vegetation 	<p>Physical loss of habitat as a result of development (infrastructure, housing, employment, sport/recreation facilities or waste management facilities); noise, light and air pollution resulting from construction activities and/or an increase in vehicle traffic; Erosion/ trampling and noise pollution as a result of recreation pressures; and interruption to hydrological regimes as a result of increased demand for water abstraction and treatment.</p> <p>None of the policy options were considered likely to result in an adverse impact on this site in particular.</p> <p>However, effects on this site may result from the following policy options which do not</p>	<p>None of the Core Strategy Preferred Options proposals that were screened were considered likely to affect this site in particular; however a number of proposals could potentially affect any sites within the county, including this one. As such, any of the potential impacts identified at the screening stage may occur in the vicinity of the site, depending on the location in which any development arising from the proposals eventually occurs.</p> <p>Noise, vibration air and light pollution are not considered likely to have an adverse effect on the freshwater pearl mussel which is the main qualifying feature of this site.</p> <p>It is not possible at this stage to make a judgement about the likelihood of there being any physical loss of habitat, due to a lack of information about the precise location of development proposed. Any development resulting from the preferred options for the general policies will be assessed at the planning application stage for its potential to result in habitat damage/loss. However, for the spatial options where the proposed locations for development have been indicated, none is proposed within close proximity of this site.</p> <p>The freshwater pearl mussel relies on the presence of trout for its breeding cycle, therefore trout fishing may be particularly damaging here. However, it is not known whether this is currently an issue at the site, therefore it is</p>	<p>Further analysis is necessary during the planning application stage, in order to determine whether adverse effects in terms of physical loss/damage to habitat will occur, once the precise location of development resulting from the Core Strategy proposals is known.</p> <p>The Protection of Natural and Historic Assets policy (now split out into four separate policies including landscape and biodiversity), should help to ensure this analysis takes place at the planning application stage.</p> <p>The Open Space, Sport and Recreation (now split out into three separate policies covering open</p>	<p>Yes, mitigation provided by policies NH2 and OS.1 should ensure that future development does not result in physical damage or loss to the habitat of this site, or in damage from increased recreation pressure.</p>

European site	Qualifying Features	Types of activities identified at the screening stage that may have an adverse impact on the integrity of European sites and policy option in Core Strategy identified as giving rise to the effect	Is an adverse effect on site integrity likely to result from any of the Preferred Options?	Recommendations for mitigating effects within the Core Strategy or further work for the HRA	If the recommendations are implemented, would it be possible that there would be no adverse effect on site integrity?
		<p>specify spatial locations for development:</p> <ul style="list-style-type: none"> • E.1 – physical disturbance/ damage, non-physical disturbance, air pollution and interruption to hydrological regimes. • E.2 - physical disturbance/ damage, non-physical disturbance, air pollution and interruption to hydrological regimes. • GT.1 - physical disturbance/ damage, non-physical disturbance and air pollution. • M.1 – physical disturbance/ damage and non-physical disturbance. • O.S2 - physical disturbance/ damage and non-physical disturbance. • SC.1 - physical disturbance/ damage and non-physical disturbance. • W.1 - physical disturbance/ damage and non-physical disturbance. • EC.1 - physical disturbance/ damage, air pollution and interruption to hydrological regimes. • EC.2 - physical 	<p>not certain whether an increase in recreation use of the site may have a detrimental effect on site integrity.</p> <p>The mussels which are the main qualifying feature of the site are vulnerable to sedimentation and high nitrate levels, therefore development nearby that results in water pollution e.g. through increased demand for water treatment is likely to be particularly detrimental to the qualifying features of the site. However, none of the sewage treatment works serving the main settlements within Herefordshire discharge into the River Clun, and it is not therefore expected that development within the county would have an adverse impact on the integrity of this site through increased water pollution.</p>	<p>space, sport and recreation facilities and protection of existing sports and recreation facilities)and Green Infrastructure policies which are to be included in the Core Strategy may have the potential to mitigate any adverse impacts arising from increased recreation use of the site.</p>	

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		<p>disturbance/ damage, air pollution and interruption to hydrological regimes.</p> <ul style="list-style-type: none"> • RA.1 - physical disturbance/ damage, non-physical disturbance and interruption to hydrological regimes. • RA.5 - physical disturbance/ damage, non-physical disturbance and interruption to hydrological regimes. • Bromyard – interruption to hydrological regimes. • Ross-on-Wye - physical disturbance/ damage, non-physical disturbance and interruption to hydrological regimes. 			
River Usk	Annex I habitats present as a qualifying feature, but not a primary reason for site selection: Water courses of plain to montane levels with the <i>Ranunculon fluitantis</i> and <i>Callitricho-Batrachion</i> vegetation (the area is considered to support a significant presence). Annex II species that are	Physical loss of habitat as a result of development (infrastructure, housing, employment, sport/recreation facilities or waste management facilities); noise, light and air pollution resulting from construction activities and/or an increase in vehicle traffic; Erosion/ trampling and noise pollution as a result of	None of the Core Strategy Preferred Options proposals that were screened were considered likely to affect this site in particular; however a number of proposals could potentially affect any sites within the county, including this one. As such, any of the potential impacts identified at the screening stage may occur in the vicinity of the site, depending on the location in which any development arising from the proposals eventually occurs. Fish species at this site such as twaite shad are vulnerable to noise pollution and vibration caused by nearby development. However, the distance from the county		Yes - the measures included in policy WM.1 should ensure that water efficiency measures are included in all types of new development, and that water resources are protected.

European site	Qualifying Features	Types of activities identified at the screening stage that may have an adverse impact on the integrity of European sites and policy option in Core Strategy identified as giving rise to the effect	Is an adverse effect on site integrity likely to result from any of the Preferred Options?	Recommendations for mitigating effects within the Core Strategy or further work for the HRA	If the recommendations are implemented, would it be possible that there would be no adverse effect on site integrity?
	<p>a primary reason for site selection: Sea lamprey <i>Petromyzon marinus</i> (considered to be one of the best areas in the UK), brook lamprey <i>Lampetra planeri</i> (considered to be one of the best areas in the UK), River lamprey <i>Lampetra fluviatilis</i> (considered to be one of the best areas in the UK), Twaite shad <i>Alosa fallax</i> (considered to be one of the best areas in the UK), Atlantic salmon <i>Salmo salar</i> (considered to be one of the best areas in the UK), Bullhead <i>Cottus gobio</i> (considered to be one of the best areas in the UK), Otter <i>Lutra lutra</i> (considered to be one of the best areas in the UK). Annex II species present as a qualifying feature, but not a primary reason for site selection: Allis shad <i>Alosa alosa</i> (the area is considered to support a significant presence).</p>	<p>recreation pressures; and interruption to hydrological regimes as a result of increased demand for water abstraction and treatment.</p> <p>None of the policy options were considered likely to result in an adverse impact on this site in particular.</p> <p>However, effects on this site may result from the following policy options which do not specify spatial locations for development:</p> <ul style="list-style-type: none"> • E.1 – physical disturbance/ damage, non-physical disturbance, air pollution and interruption to hydrological regimes. • E.2 - physical disturbance/ damage, non-physical disturbance, air pollution and interruption to hydrological regimes. • GT.1 - physical disturbance/ damage, non-physical disturbance and air pollution. • M.1 – physical disturbance/ damage and non-physical 	<p>boundary to this site indicates that such impacts are not likely. Similarly, air and light pollution would not be expected to affect the site due to the distance from any potential development that may result from the Core Strategy.</p> <p>It is not likely that the Core Strategy proposals will result in physical loss of habitat at this site, due its distance from the outside of the county boundary – Core Strategy proposals will only result in development within Herefordshire itself.</p> <p>This site is small-sized, and is located some distance from the main settlements in Herefordshire, therefore is less accessible than many other potential recreation sites in and around the county. As such, it is concluded that recreation pressures are unlikely to increase significantly at the site as a result of housing development proposed in the Core Strategy.</p> <p>It is uncertain at this stage whether housing development may occur in the vicinity of the site (e.g. under preferred option RA1); however the site is particularly vulnerable to any interruption to hydrological regimes, therefore development nearby that results in increased demand for water abstraction/ treatment is likely to be particularly detrimental to the qualifying features of the site. The site is already being monitored due to localised enrichment from sewage discharge and the effects of water abstraction; therefore any development that increases demand for water abstraction/treatment in the area may have a significant adverse effect on site integrity. Water quality and quantity are of particular importance to the twaite shad population, which is one of the key qualifying features of the site.</p>		

European site	Qualifying Features	Types of activities identified at the screening stage that may have an adverse impact on the integrity of European sites and policy option in Core Strategy identified as giving rise to the effect	Is an adverse effect on site integrity likely to result from any of the Preferred Options?	Recommendations for mitigating effects within the Core Strategy or further work for the HRA	If the recommendations are implemented, would it be possible that there would be no adverse effect on site integrity?
	<p>Conditions needed to support site integrity:</p> <ul style="list-style-type: none"> • Maintain water quality, water flows and control water abstractions • Encourage appropriate management of adjacent land to reduce sedimentation and diffuse agricultural pollution • Removal of barriers to fish migration 	<p>disturbance.</p> <ul style="list-style-type: none"> • O.S2 - physical disturbance/ damage and non-physical disturbance. • SC.1 - physical disturbance/ damage and non-physical disturbance. • W.1 - physical disturbance/ damage and non-physical disturbance. • EC.1 - physical disturbance/ damage, air pollution and interruption to hydrological regimes. • EC.2 - physical disturbance/ damage, air pollution and interruption to hydrological regimes. • RA.1 - physical disturbance/ damage, non-physical disturbance and interruption to hydrological regimes. • RA.5 - physical disturbance/ damage, non-physical disturbance and interruption to hydrological regimes. • Bromyard – interruption to hydrological regimes. • Ross-on-Wye - physical disturbance/ damage, non-physical disturbance and 	<p>However, discharges into the River Usk are made from sewage treatment works at Abergavenny and Brecon, which serve areas outside of Herefordshire. As such, development proposed within the Herefordshire Core Strategy is not expected to increase sewage discharges at the site and therefore impact upon site integrity through increased water pollution. In terms of water quantity, according to the Environment Agency, it is unlikely to grant any new abstraction licences in any Water Resource Management Unit (WRMU) within Herefordshire as they are all currently at 'no water available' status. In addition, Welsh Water is not forecasting any supply deficits in Herefordshire aside from the Vowchurch WRMU which makes up only 2% of the county, and so it states that it can meet forecast growth without new or increased abstraction licenses. However, this is dependent on the outcomes of the EA's Review of Consents work and Welsh Water is delaying the publication of its WRMP until this has been carried out. As such, it is not yet possible to rule out the possibility of water abstraction having an adverse impact on the integrity of this site.</p>		

European site	Qualifying Features	Types of activities identified at the screening stage that may have an adverse impact on the integrity of European sites and policy option in Core Strategy identified as giving rise to the effect	Is an adverse effect on site integrity likely to result from any of the Preferred Options?	Recommendations for mitigating effects within the Core Strategy or further work for the HRA	If the recommendations are implemented, would it be possible that there would be no adverse effect on site integrity?
		interruption to hydrological regimes.			
River Wye	Annex I habitats that are a primary reason for site selection: Water courses of plain to montane levels with the <i>Ranuncion fluitantis</i> and <i>Callitricho-Batrachion vegetation</i> (considered to be one of the best areas in the UK). Annex II habitats present as a qualifying feature, but not a primary reason for site selection: Transition mires and quaking bogs (considered to support a significant presence). Annex II species that are a primary reason for site selection: White-clawed (or Atlantic Stream) crayfish <i>Austropotamobius pallipes</i> (considered to be one of the best areas in the UK), Sea lamprey <i>Petromyzon marinus</i> (considered to be one of the best areas in the UK), Brook	Physical loss of habitat as a result of development (infrastructure, housing, employment, sport/recreation facilities or waste management facilities); noise, light and air pollution resulting from construction activities and/or an increase in vehicle traffic; Erosion/trampling and noise pollution as a result of recreation pressures; and interruption to hydrological regimes as a result of increased demand for water abstraction and treatment. The following policy options were considered most likely to result in an adverse impact on this site: <ul style="list-style-type: none">• E.2 - physical disturbance/damage, non-physical disturbance, air pollution and interruption to hydrological regimes.• GT.1 - physical	The preferred spatial strategy for Ross-on-Wye and five of the policies for Hereford were identified as possibly having an adverse effect on the integrity of this site in particular e.g. as a result of potential pressures for recreation space and disturbance to hydrological regimes; however a number of other proposals could potentially affect any sites within the county, including this one. As such, any of the potential impacts identified at the screening stage may occur in the vicinity of the site, depending on the location in which any development arising from the proposals eventually occurs. Air light pollution is not considered likely to have an adverse effect on the qualifying features of this site. Some of the qualifying features of this site such as the twaite shad and the otter are vulnerable to the potential impacts of noise and light pollution and vibration caused by development. The location of this site in relation to Hereford, where much of the development proposed by the Core Strategy policies will be focussed, indicates that such disturbance effects are likely to impact upon the integrity of this site. In particular, the development of the Hereford Relief road, which would span the site, may have a particular adverse effect. Increasing demand for recreation activities such as fishing, boating and canoeing at the site is already a cause for concern; therefore development in close proximity of the site, which may result in such pressures increasing because of population growth (e.g. the housing development proposed	Further analysis is necessary during the planning application stage, in order to determine whether adverse effects in terms of physical loss/damage to habitat will occur, once the precise location of development resulting from the Core Strategy proposals is known. The Protection of Natural and Historic Assets policy (now split out into four separate policies including landscape and biodiversity), should help to ensure this analysis takes place at the planning application stage. The potential for the construction of the western relief road to adversely affect the site may be mitigated by avoiding direct working in the watercourse and by the use of widespan	The measures included in policy WM.1 should ensure that water efficiency measures are included in all types of new development, and that water resources are protected. Uncertain for water pollution effects until outcome of Environment Agency's review of consents are available.

European site	Qualifying Features	Types of activities identified at the screening stage that may have an adverse impact on the integrity of European sites and policy option in Core Strategy identified as giving rise to the effect	Is an adverse effect on site integrity likely to result from any of the Preferred Options?	Recommendations for mitigating effects within the Core Strategy or further work for the HRA	If the recommendations are implemented, would it be possible that there would be no adverse effect on site integrity?
	<p>lamprey <i>Lampetra planeri</i> (considered to be one of the best areas in the UK), River lamprey <i>Lampetra fluviatilis</i> (considered to be one of the best areas in the UK), Twaite shad <i>Alosa fallax</i> (considered to be one of the best areas in the UK) Atlantic salmon <i>Salmo salar</i> (considered to be one of the best areas in the UK), Bullhead <i>Cottus gobio</i> (considered to one of the best areas in the UK), Otter <i>Lutra lutra</i> (considered to be one of the best areas in the UK). Annex II species present as a qualifying feature, but not a primary reason for site selection: Allis shad <i>Alosa alosa</i> (considered to support a significant presence).</p> <p>Conditions needed to support site integrity:</p> <ul style="list-style-type: none"> Maintain water quality and flow levels Encourage appropriate 	<p>disturbance/ damage, non-physical disturbance, air pollution and interruption to hydrological regimes.</p> <ul style="list-style-type: none"> M1 - physical disturbance/ damage and non-physical disturbance. OS.2 - physical disturbance/ damage and non-physical disturbance. SC.1 - physical disturbance/ damage and non-physical disturbance. W1 - physical disturbance/ damage and non-physical disturbance. EC.1 - physical disturbance/ damage, air pollution and interruption to hydrological regimes. EC2 - physical disturbance/ damage, non-physical disturbance, air pollution and interruption to hydrological regimes. Bromyard - interruption to hydrological regimes. Ross-on-Wye - interruption to hydrological regimes and physical damage/disturbance. H1 - physical disturbance/ 	<p>under the Preferred Option for Leominster), is likely to have a significant adverse impact on the site's integrity.</p> <p>It is not possible at this stage to make a judgement about the likelihood of there being any physical loss of habitat as a result of the other Core Strategy Preferred Options (the ones which may affect any sites), due to a lack of information about the precise location of development proposed. Any development resulting from the preferred options for the general policies will be assessed at the planning application stage for its potential to result in habitat loss. However, Preferred Option H2: Hereford Movement Policy proposes the development of a relief road which would span the River Wye; however this would involve the construction of a bridge overhead and would not result in physical loss of habitat at the site unless construction work were to take place within the watercourse itself, which is to be avoided.</p> <p>Under the spatial strategy for Leominster Ross-on-Wye and five of the policies for Hereford, housing development is proposed within reasonably close proximity of this site. Although the distance is great enough that physical disturbance as a direct result of development is not a concern, it is possible that hydrological regimes at the site may be interrupted as a result of increased demand for water abstraction and/or water treatment. The site is already experiencing impacts on water quality as a result of changing land use within the catchment, and by point-source discharges, therefore any increase in demand for water treatment in the vicinity of the site is likely to be damaging to its integrity. Most of the sewage treatment works that serve the settlements within Herefordshire discharge into the River Wye, either directly or via tributaries such as the River</p>	<p>structures.</p> <p>Noise and light pollution and vibration effects arising during development may be mitigated by the implementation of good practice techniques such as avoiding working at night to minimise disturbance to otter and timing works to avoid critical periods for particular species e.g. July-October in the case of the Allis Shad.</p> <p>The Open Space, Sport and Recreation (now split out into three separate policies covering open space, sport and recreation facilities and protection of existing sports and recreation facilities and Green Infrastructure policies which are to be included in the Core Strategy may have the potential to mitigate any adverse impacts arising from</p>	

European site	Qualifying Features	Types of activities identified at the screening stage that may have an adverse impact on the integrity of European sites and policy option in Core Strategy identified as giving rise to the effect	Is an adverse effect on site integrity likely to result from any of the Preferred Options?	Recommendations for mitigating effects within the Core Strategy or further work for the HRA	If the recommendations are implemented, would it be possible that there would be no adverse effect on site integrity?
	<p>management of adjacent land to reduce sedimentation and diffuse agricultural pollution</p> <ul style="list-style-type: none"> Control of recreational activities Maintain water table levels Removal and prevention of barriers to fish migration 	<p>damage, non-physical disturbance and interruption to hydrological regimes.</p> <ul style="list-style-type: none"> H2 - physical disturbance/damage and non-physical disturbance. H3 - non-physical disturbance and interruption to hydrological regimes. H4 - non-physical disturbance and interruption to hydrological regimes. H5 - non-physical disturbance and interruption to hydrological regimes. H6 - non-physical disturbance and interruption to hydrological regimes. <p>However, effects on this site may result from the following policy options which do not specify spatial locations for development:</p> <ul style="list-style-type: none"> E.1 – physical disturbance/damage, non-physical disturbance, air pollution and interruption to 	<p>Lugg, River Frome, River Monnow and the River Arrow. The River Lugg catchment suffers from pollution pressures from phosphates entering the river from STW discharges and agricultural diffuse pollution. Diffuse pollution also arises from urban areas. Therefore, increased pollution pressure on the River Lugg catchment (due to increased pressure on STW capacity associated with new housing proposed at Leominster and some of the Rural Service Centres near Leominster and just north of Hereford), in combination with direct pressure on the River Wye from housing proposed at Hereford, as well as diffuse pollution from agricultural practices and urban areas, could have an adverse effect on the integrity of the River Wye SAC. As such, it remains likely that increased water pollution may adversely affect this site as a result of these proposals.</p> <p>In terms of water quantity, according to the Environment Agency, it is unlikely to grant any new abstraction licences in any Water Resource Management Unit (WRMU) within Herefordshire as they are all currently at 'no water available' status. In addition, Welsh Water is not forecasting any supply deficits in Herefordshire aside from the Vowchurch WRMU which makes up only 2% of the county, and so it states that it can meet forecast growth without new or increased abstraction licenses. However, this is dependent on the outcomes of the EA's Review of Consents work and Welsh Water is delaying the publication of its WRMP until this has been carried out. As such, it is not yet possible to rule out the possibility of water abstraction having an adverse impact on the integrity of this site.</p>	<p>increased recreation use of the site.</p> <p>Herefordshire Council has been consulting with Dwr Cymru Welsh Water regarding capacity in the STWs serving towns and villages within Herefordshire. DCWW has provided information to Herefordshire Council regarding the status of any modifications to the discharge consents that have been implemented (e.g. tightening the limits in terms of phosphate or ammonia levels etc.). While some upgrading has already taken place, future upgrades will be required to accommodate the levels of growth planned in some towns and villages. For any further upgrading work that is not already planned for in the current 5 year Investment Plans (AMP 5, 2010-2015), DCWW has advised Herefordshire Council</p>	

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		<p>hydrological regimes.</p> <ul style="list-style-type: none"> • E.2 - physical disturbance/ damage, non-physical disturbance, air pollution and interruption to hydrological regimes. • GT.1 - physical disturbance/ damage, non-physical disturbance and air pollution. • M.1 – physical disturbance/ damage and non-physical disturbance. • O.S2 - physical disturbance/ damage and non-physical disturbance. • SC.1 - physical disturbance/ damage and non-physical disturbance. • W.1 - physical disturbance/ damage and non-physical disturbance. • EC.1 - physical disturbance/ damage, air pollution and interruption to hydrological regimes. • EC.2 - physical disturbance/ damage, air pollution and interruption to hydrological regimes. • RA.1 - physical disturbance/ damage, non-physical disturbance and 		<p>that it will apply for appropriate funding in the subsequent Investment Plans, as the plan period for the Core Strategy is until 2026. Therefore, future STW upgrading should be able to be delivered to meet planned growth during the life of the Core Strategy, as specific development sites and housing numbers are confirmed for particular towns and villages, through the Investment Plans, subject to funding approval from the Water Industry Regulator (Ofwat). Policy ID.1: Infrastructure Contributions states the Council's intention to make provision for new infrastructure to support development through co-ordinating with the capital investment programmes of the water industries. Therefore it is expected that the consultation with the water company will</p>	

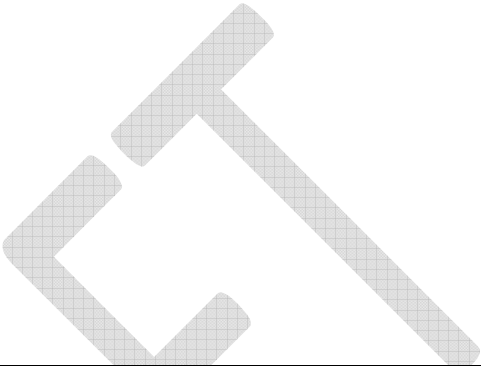
European site	Qualifying Features	Types of activities identified at the screening stage that may have an adverse impact on the integrity of European sites and policy option in Core Strategy identified as giving rise to the effect	Is an adverse effect on site integrity likely to result from any of the Preferred Options?	Recommendations for mitigating effects within the Core Strategy or further work for the HRA	If the recommendations are implemented, would it be possible that there would be no adverse effect on site integrity?
		<p>interruption to hydrological regimes.</p> <ul style="list-style-type: none"> • RA.5 - physical disturbance/ damage, non-physical disturbance and interruption to hydrological regimes. • Bromyard – interruption to hydrological regimes. • Ross-on-Wye - physical disturbance/ damage, non-physical disturbance and interruption to hydrological regimes. 		continue in order to ensure the appropriate upgrading occurs.	
Severn Estuary	Annex I habitats that are a primary reason for site selection: Estuaries (considered to be one of the best areas in the UK), Mudflats and sandflats not covered by seawater at low tide (considered to be one of the best areas in the UK), Atlantic salt meadows <i>Glauca-Puccinellietalia maritimae</i> (considered to be one of the best areas in the UK). Annex I habitats present as a qualifying feature, but not a primary reason for site selection:	Physical loss of habitat as a result of development (infrastructure, housing, employment, sport/recreation facilities or waste management facilities); noise, light and air pollution resulting from construction activities and/or an increase in vehicle traffic; Erosion/ trampling and noise pollution as a result of recreation pressures; and interruption to hydrological regimes as a result of increased demand for water abstraction and treatment.	None of the Core Strategy Preferred Options proposals that were screened were considered likely to affect this site in particular; however a number of proposals could potentially affect any sites within the county, including this one. As such, any of the potential impacts identified at the screening stage may occur in the vicinity of the site, depending on the location in which any development arising from the proposals eventually occurs. Air and light pollution are not considered likely to have an adverse effect on the qualifying features of this site. Certain species at this site are vulnerable to the noise pollution and vibration that may be caused by development; however the distance of this site from the county boundary, within which development resulting from the Core Strategy will be located, is such that these effects are not considered likely to be transmitted to this site.	The Open Space, Sport and Recreation (now split out into three separate policies covering open space, sport and recreation facilities and protection of existing sports and recreation facilities and Green Infrastructure policies which are to be included in the Core Strategy may have the potential to mitigate any adverse impacts arising from increased recreation use of the site.	Yes, mitigation provided by policy OS.I should ensure that future development does not result in damage from increased recreation pressure. The measures included in policy WM.I should ensure that water efficiency measures are included in all types of new development, and that water resources are protected.

European site	Qualifying Features	Types of activities identified at the screening stage that may have an adverse impact on the integrity of European sites and policy option in Core Strategy identified as giving rise to the effect	Is an adverse effect on site integrity likely to result from any of the Preferred Options?	Recommendations for mitigating effects within the Core Strategy or further work for the HRA	If the recommendations are implemented, would it be possible that there would be no adverse effect on site integrity?
	<p>Sandbanks, which are slightly covered by sea water all the time (considered to support a significant presence), Reefs (the area is considered to support a significant presence). Annex II species that are a primary reason for site selection: Sea lamprey <i>Petromyzon marinus</i> (considered to be one of the best areas in the UK), River lamprey <i>Lampetra fluviatilis</i> (considered to be one of the best areas in the UK), Twaite shad <i>Alosa fallax</i> (considered to be one of the best areas in the UK).</p> <p>Conditions needed to support site integrity:</p> <ul style="list-style-type: none"> • Maintain tidal regime • Prevention of water and air borne • pollution • Control of recreational activities • Control of extraction and other industrial 	<p>None of the policy options were considered likely to result in an adverse impact on this site in particular.</p> <p>However, effects on this site may result from the following policy options which do not specify spatial locations for development:</p> <ul style="list-style-type: none"> • E.1 – physical disturbance/ damage, non-physical disturbance, air pollution and interruption to hydrological regimes. • E.2 - physical disturbance/ damage, non-physical disturbance, air pollution and interruption to hydrological regimes. • GT.1 - physical disturbance/ damage, non-physical disturbance and air pollution. • M.1 – physical disturbance/ damage and non-physical disturbance. • O.S2 - physical disturbance/ damage and non-physical disturbance. • SC.1 - physical disturbance/ damage and 	<p>It is not likely that the Core Strategy proposals will result in physical loss of habitat at this site, due its distance from the outside of the county boundary – Core Strategy proposals will only result in development within Herefordshire itself.</p> <p>The site is vulnerable to tourism-based activities and disturbance. Any increase in population in the surrounding area, e.g. as a result of nearby housing development, which may increase pressure for recreation and amenity space, is therefore considered likely to have an adverse effect on the site's integrity.</p> <p>The qualifying features of this site are dependent on the tidal regime, therefore any changes to hydrological regimes e.g. through increased abstraction demand as a result of new housing development nearby, is likely to have an adverse effect on site integrity. It is uncertain at this stage whether housing development may occur within fairly close proximity of the site (e.g. housing proposed under preferred option RA1); however the site is particularly vulnerable to any increase in water abstraction. However, according to the Environment Agency, it is unlikely to grant any new abstraction licences in any Water Resource Management Unit (WRMU) within Herefordshire as they are all currently at 'no water available' status. In addition, Welsh Water is not forecasting any supply deficits in Herefordshire aside from the Vowchurch WRMU which makes up only 2% of the county, and so it states that it can meet forecast growth without new or increased abstraction licenses. However, this is dependent on the outcomes of the EA's Review of Consents work and Welsh Water is delaying the publication of its WRMP until this has been carried out. As such, it is</p>		

European site	Qualifying Features	Types of activities identified at the screening stage that may have an adverse impact on the integrity of European sites and policy option in Core Strategy identified as giving rise to the effect	Is an adverse effect on site integrity likely to result from any of the Preferred Options?	Recommendations for mitigating effects within the Core Strategy or further work for the HRA	If the recommendations are implemented, would it be possible that there would be no adverse effect on site integrity?
	activities	non-physical disturbance. <ul style="list-style-type: none"> • W.1 - physical disturbance/ damage and non-physical disturbance. • EC.1 - physical disturbance/ damage, air pollution and interruption to hydrological regimes. • EC.2 - physical disturbance/ damage, air pollution and interruption to hydrological regimes. • RA.1 - physical disturbance/ damage, non-physical disturbance and interruption to hydrological regimes. • RA.5 - physical disturbance/ damage, non-physical disturbance and interruption to hydrological regimes. • Bromyard – interruption to hydrological regimes. • Ross-on-Wye - physical disturbance/ damage, non-physical disturbance and interruption to hydrological regimes. 	not yet possible to rule out the possibility of water abstraction having an adverse impact on the integrity of this site.		
Sugar Loaf Woodlands	Annex I habitats that are a primary reason for site selection: Old sessile	Physical loss of habitat as a result of development (infrastructure, housing,	None of the Core Strategy Preferred Options proposals that were screened were considered likely to affect this site in particular; however a number of proposals could potentially	The Open Space, Sport and Recreation and Green Infrastructure	Yes, mitigation provided by policy OS.1 should ensure that future

European site	Qualifying Features	Types of activities identified at the screening stage that may have an adverse impact on the integrity of European sites and policy option in Core Strategy identified as giving rise to the effect	Is an adverse effect on site integrity likely to result from any of the Preferred Options?	Recommendations for mitigating effects within the Core Strategy or further work for the HRA	If the recommendations are implemented, would it be possible that there would be no adverse effect on site integrity?
	<p>oak woods with <i>Ilex</i> and <i>Blechnum</i> in the British Isles (considered to be one of the best areas in the UK).</p> <p>Conditions needed to support site integrity:</p> <ul style="list-style-type: none"> • Monitor grazing and control if necessary • Control of recreational activities • Secure appropriate management regimes 	<p>employment, sport/recreation facilities or waste management facilities); noise, light and air pollution resulting from construction activities and/or an increase in vehicle traffic; Erosion/trampling and noise pollution as a result of recreation pressures; and interruption to hydrological regimes as a result of increased demand for water abstraction and treatment.</p> <p>None of the policy options were considered likely to result in an adverse impact on this site in particular.</p> <p>However, effects on this site may result from the following policy options which do not specify spatial locations for development:</p> <ul style="list-style-type: none"> • E.1 – physical disturbance/damage, non-physical disturbance, air pollution and interruption to hydrological regimes. • E.2 - physical disturbance/damage, non-physical 	<p>affect any sites within the county, including this one. As such, any of the potential impacts identified at the screening stage may occur in the vicinity of the site, depending on the location in which any development arising from the proposals eventually occurs.</p> <p>Any light pollution, noise or vibration resulting from construction activities will not affect woodland, which is the main qualifying feature of the site.</p> <p>Epiphytic lichens on the oak trees are particularly vulnerable to airborne acid and nutrient deposition, and current levels of acid and nitrogen deposition are both above critical loads. As such, increased air pollution as a result of development is likely to have an adverse effect on the integrity of this site. However, only minor roads are located within 200m of the site boundary, which are unlikely to experience a significant increase in vehicle traffic as a result of Core Strategy proposals. As such, increased air pollution from vehicle traffic is considered unlikely to affect this site. The likelihood of other forms of air pollution having an adverse impact on this site will depend on the location of development such as waste facilities (incorporating thermal treatment) or agricultural works, which may result in air pollution, in relation to the site. This will not be known until the planning application stage. However, such air pollution would be localised to the development and as this site lies outside of the county boundary, and therefore some distance from any development that would result from the Core Strategy policies, it is not likely that air pollution from development would have an adverse impact here.</p> <p>It is not likely that the Core Strategy proposals will result in</p>	<p>policies which are to be included in the Core Strategy may have the potential to mitigate any adverse impacts arising from increased recreation use of the site.</p>	<p>development does not result in damage from increased recreation pressure.</p>

European site	Qualifying Features	Types of activities identified at the screening stage that may have an adverse impact on the integrity of European sites and policy option in Core Strategy identified as giving rise to the effect	Is an adverse effect on site integrity likely to result from any of the Preferred Options?	Recommendations for mitigating effects within the Core Strategy or further work for the HRA	If the recommendations are implemented, would it be possible that there would be no adverse effect on site integrity?
		<p>disturbance, air pollution and interruption to hydrological regimes.</p> <ul style="list-style-type: none"> • GT.1 - physical disturbance/ damage, non-physical disturbance and air pollution. • M.1 – physical disturbance/ damage and non-physical disturbance. • O.S2 - physical disturbance/ damage and non-physical disturbance. • SC.1 - physical disturbance/ damage and non-physical disturbance. • W.1 - physical disturbance/ damage and non-physical disturbance. • EC.1 - physical disturbance/ damage, air pollution and interruption to hydrological regimes. • EC.2 - physical disturbance/ damage, air pollution and interruption to hydrological regimes. • RA.1 - physical disturbance/ damage, non-physical disturbance and interruption to hydrological regimes. • RA.5 - physical 	<p>physical loss of habitat at this site, due its distance from the outside of the county boundary – Core Strategy proposals will only result in development within Herefordshire itself.</p> <p>Deliberately started fires are a problem at the site, and if development resulting from proposals in the Core Strategy were to increase recreation/amenity use of the site, it is possible that existing human-based problems such as this may be compounded, having adverse effects on the qualifying features of the site.</p> <p>The integrity of this site is not considered likely to be significantly adversely affected by changes to hydrological regimes as the qualifying features are not particularly vulnerable to changes in water quality/quantity.</p>		

European site	Qualifying Features	Types of activities identified at the screening stage that may have an adverse impact on the integrity of European sites and policy option in Core Strategy identified as giving rise to the effect	Is an adverse effect on site integrity likely to result from any of the Preferred Options?	Recommendations for mitigating effects within the Core Strategy or further work for the HRA	If the recommendations are implemented, would it be possible that there would be no adverse effect on site integrity?
		<p>disturbance/ damage, non-physical disturbance and interruption to hydrological regimes.</p> <ul style="list-style-type: none"> • Bromyard – interruption to hydrological regimes. • Ross-on-Wye - physical disturbance/ damage, non-physical disturbance and interruption to hydrological regimes. 			
Usk Bat Sites	<p>Annex I habitats present as a qualifying feature, but not a primary reason for site selection: European dry heaths (considered to support a significant presence), Degraded raised bogs still capable of natural regeneration (is considered to support a significant presence), Blanket bogs (priority feature) (is considered to support a significant presence), Calcareous rocky slopes with chasmophytic vegetation (is considered to be rare as its total extent in the UK</p>	<p>Physical loss of habitat as a result of development (infrastructure, housing, employment, sport/recreation facilities or waste management facilities); noise, light and air pollution resulting from construction activities and/or an increase in vehicle traffic; Erosion/trampling and noise pollution as a result of recreation pressures; and interruption to hydrological regimes as a result of increased demand for water abstraction and treatment.</p> <p>None of the policy options were considered likely to</p>	<p>None of the Core Strategy Preferred Options proposals that were screened were considered likely to affect this site in particular; however a number of proposals could potentially affect any sites within the county, including this one. As such, any of the potential impacts identified at the screening stage may occur in the vicinity of the site, depending on the location in which any development arising from the proposals eventually occurs.</p> <p>The bats which are one of the qualifying features for this site may be adversely affected by noise, vibration and particularly light pollution resulting from development in the vicinity of the site. However, the site lies at the far edge of the 15km buffer around the Herefordshire county boundary, and so will be far enough from any development taking place within the county that effects of this nature are not likely.</p> <p>Bog habitats are particularly vulnerable to nitrogen increases in terms of their plant species composition. As such, any increases in air pollution as a result of development may be</p>	<p>Further analysis is necessary during the planning application stage, in order to determine whether adverse effects are likely in terms of increased air pollution from an increase in nearby vehicle traffic, once the precise location of development resulting from the Core Strategy proposals is known.</p> <p>Further information about forecast increases in traffic along the A465 into Herefordshire is required.</p>	<p>Uncertain at this stage for air pollution.</p> <p>The measures included in policy WM.1 should ensure that water efficiency measures are included in all types of new development, and that water resources are protected.</p>

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	<p>is estimated to be less than 1000ha and for which the area is considered to support a significant presence), Caves not open to the public (for which the area is considered to support a significant presence), Tilio- Acerion forests of slopes, screes and ravines (priority feature) (is considered to support a significant presence). Annex II species of primary reason for site selection: Lesser horseshoe bat <i>Rhinolophus hipposideros</i>, UK population 5%, although it is suggested this is an underestimate (is considered to be one of the best areas in the UK).</p> <p>Conditions needed to support site integrity:</p> <ul style="list-style-type: none"> • Maintain appropriate grazing levels • Implement and monitor appropriate 	<p>result in an adverse impact on this site in particular.</p> <p>However, effects on this site may result from the following policy options which do not specify spatial locations for development:</p> <ul style="list-style-type: none"> • E.1 – physical disturbance/ damage, non-physical disturbance, air pollution and interruption to hydrological regimes. • E.2 - physical disturbance/ damage, non-physical disturbance and interruption to hydrological regimes. • GT.1 - physical disturbance/ damage, non-physical disturbance and air pollution. • M.1 – physical disturbance/ damage and non-physical disturbance. • O.S2 - physical disturbance/ damage and non-physical disturbance. • SC.1 - physical disturbance/ damage and non-physical disturbance. • W.1 - physical disturbance/ damage and non-physical 	<p>particularly detrimental to the integrity of this site. Although no information is available with regards to current levels of air pollution at the site, the A465 lies within 200m of the site boundary, and main roads such as this are considered to be the most likely to see significant increases in vehicle traffic as a result of development such as that proposed within the Core Strategy. As such, it remains likely that this site may experience adverse impacts resulting from increased air pollution. The likelihood of other forms of air pollution having an adverse impact on this site will depend on the location of development such as waste facilities (incorporating thermal treatment) or agricultural works, which may result in air pollution, in relation to the site. This will not be known until the planning application stage. However, such air pollution would be localised to the development and as this site lies outside of the county boundary, and therefore some distance from any development that would result from the Core Strategy policies, it is not likely that air pollution from development would have an adverse impact here.</p> <p>It is not likely that the Core Strategy proposals will result in physical loss of habitat at this site, due its distance from the outside of the county boundary – Core Strategy proposals will only result in development within Herefordshire itself.</p> <p>The site is located some distance from the nearest towns in Herefordshire, therefore is relatively inaccessible to the main population centres, indicating that recreation pressures are unlikely to be significant here.</p> <p>It is uncertain at this stage whether housing development may occur in the vicinity of the site (e.g. if housing proposed</p>		

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	<p>management regime</p> <ul style="list-style-type: none"> • Maintain water-table levels • Control disturbance • Monitor succession • Maintain control of access and prevent disturbance • No loss of or damage to roost and hibernation sites • No loss of or damage to foraging areas. 	<p>disturbance.</p> <ul style="list-style-type: none"> • EC.1 - physical disturbance/ damage, air pollution and interruption to hydrological regimes. • EC.2 - physical disturbance/ damage, air pollution and interruption to hydrological regimes. • RA.1 - physical disturbance/ damage, non-physical disturbance and interruption to hydrological regimes. • RA.5 - physical disturbance/ damage, non-physical disturbance and interruption to hydrological regimes. • Bromyard – interruption to hydrological regimes. • Ross-on-Wye - physical disturbance/ damage, non-physical disturbance and interruption to hydrological regimes. 	<p>under preferred option RA1 were to be located just inside the south western part of the county boundary); however the site is particularly vulnerable to any interruption to hydrological regimes in terms of altering the level of the water table, therefore development nearby that results in increased demand for water abstraction is likely to be particularly detrimental to the qualifying features of the site. According to the Environment Agency, it is unlikely to grant any new abstraction licences in any Water Resource Management Unit (WRMU) within Herefordshire as they are all currently at 'no water available' status. In addition, Welsh Water is not forecasting any supply deficits in Herefordshire aside from the Vowchurch WRMU which makes up only 2% of the county, and so it states that it can meet forecast growth without new or increased abstraction licenses. However, this is dependent on the outcomes of the EA's Review of Consents work and Welsh Water is delaying the publication of its WRMP until this has been carried out. As such, it is not yet possible to rule out the possibility of water abstraction having an adverse impact on the integrity of this site.</p>		
<p>Wye Valley and Forest of Dean Bat Sites</p>	<p>Annex II species that are a primary reason for site selection: Lesser horseshoe bat <i>Rhinolophus hipposideros</i> (considered to be one of</p>	<p>Physical loss of habitat as a result of development (infrastructure, housing, employment, sport/recreation facilities or waste management facilities); noise,</p>	<p>The preferred spatial strategy for Ross-on-Wye was identified as possibly having an adverse effect on the integrity of this site in particular; however a number of other Core Strategy Preferred Options proposals could potentially affect any sites within the county, including this one. As such, any of the potential impacts identified at the screening stage may</p>	<p>The implementation of good practice construction techniques should help to mitigate noise and vibration effects resulting from new</p>	<p>Uncertain at this stage.</p>

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	<p>the best areas in the UK), Greater horseshoe bat <i>Rhinolophus ferrumequinum</i> (considered to be one of the best areas in the UK)</p> <p>Conditions needed to support site integrity:</p> <ul style="list-style-type: none"> No loss of or damage to roost and hibernation sites No loss of or damage to foraging areas No loss of or damage to roost and hibernation sites No loss of or damage to foraging areas 	<p>light and air pollution resulting from construction activities and/or an increase in vehicle traffic; Erosion/trampling and noise pollution as a result of recreation pressures; and interruption to hydrological regimes as a result of increased demand for water abstraction and treatment.</p> <p>The following policy options were considered most likely to result in an adverse impact on this site:</p> <ul style="list-style-type: none"> E.2 - physical disturbance/ damage, non-physical disturbance, air pollution and interruption to hydrological regimes. GT.1 - physical disturbance/ damage, non-physical disturbance, air pollution and interruption to hydrological regimes. OS.2 - physical disturbance/ damage and non-physical disturbance. SC.1 - physical disturbance/ damage and 	<p>occur in the vicinity of the site, depending on the location in which any development arising from the proposals eventually occurs.</p> <p>This site lies within 10km of Ross-on-Wye; therefore may be affected by noise, vibration and light pollution as a result of the development proposed in and around the town under the spatial option for Ross-on-Wye. A number of probable or confirmed roosting sites for lesser horseshoe bats lie within close proximity of the proposed strategic housing site at Hildersley, which may be adversely affected by light pollution. However, more information is required with regards to the type and size of the roosts, in order to make an accurate judgement about the likely extent of the effects.</p> <p>Air pollution is not considered likely to affect the qualifying features of this site.</p> <p>It is not likely that the Core Strategy proposals will result in physical loss of habitat at this site, due its distance from the outside of the county boundary – Core Strategy proposals will only result in development within Herefordshire itself.</p> <p>The location of this site means that it is easily accessible from the town of Ross-on-Wye. Under the preferred spatial strategy for the town, 1,000 new homes are proposed (in line with RSS allocations), meaning that pressure for recreation/amenity space is likely to increase in the surrounding area. No information is available about the current level or type of recreation use of this site; however due to the scale and proximity of the housing development proposed, an adverse impact on integrity cannot be ruled out.</p>	<p>development. Light pollution effects may be partially mitigated by the use of appropriate street lighting and by the provision of high quality alternative habitat for bat roosting sites (e.g. good quality hedgerows) further away from development.</p> <p>The Open Space, Sport and Recreation (now split out into three separate policies covering open space, sport and recreation facilities and protection of existing sports and recreation facilities and Green Infrastructure policies which are to be included in the Core Strategy may have the potential to mitigate any adverse impacts arising from increased recreation use of the site.</p>	

European site	Qualifying Features	Types of activities identified at the screening stage that may have an adverse impact on the integrity of European sites and policy option in Core Strategy identified as giving rise to the effect	Is an adverse effect on site integrity likely to result from any of the Preferred Options?	Recommendations for mitigating effects within the Core Strategy or further work for the HRA	If the recommendations are implemented, would it be possible that there would be no adverse effect on site integrity?
		<p>non-physical disturbance.</p> <ul style="list-style-type: none"> • WI - physical disturbance/ damage and non-physical disturbance. • EC.1 - physical disturbance/ damage, air pollution and interruption to hydrological regimes. • EC2 - physical disturbance/ damage, non-physical disturbance, air pollution and interruption to hydrological regimes. • Ross-on-Wye - physical damage/disturbance. <p>However, effects on this site may result from the following policy options which do not specify spatial locations for development:</p> <ul style="list-style-type: none"> • E.1 – physical disturbance/ damage, non-physical disturbance, air pollution and interruption to hydrological regimes. • E.2 - physical disturbance/ damage, non-physical disturbance, air pollution and interruption to hydrological regimes. • GT.1 - physical disturbance/ damage, non- 	<p>The integrity of this site is not considered likely to be significantly adversely affected by changes to hydrological regimes as the qualifying features are not particularly vulnerable to changes in water quality/quantity.</p>		

European site	Qualifying Features	Types of activities identified at the screening stage that may have an adverse impact on the integrity of European sites and policy option in Core Strategy identified as giving rise to the effect	Is an adverse effect on site integrity likely to result from any of the Preferred Options?	Recommendations for mitigating effects within the Core Strategy or further work for the HRA	If the recommendations are implemented, would it be possible that there would be no adverse effect on site integrity?
		<p>physical disturbance and air pollution.</p> <ul style="list-style-type: none"> • M.1 – physical disturbance/ damage and non-physical disturbance. • O.S2 - physical disturbance/ damage and non-physical disturbance. • SC.1 - physical disturbance/ damage and non-physical disturbance. • W.1 - physical disturbance/ damage and non-physical disturbance. • EC.1 - physical disturbance/ damage, air pollution and interruption to hydrological regimes. • EC.2 - physical disturbance/ damage, air pollution and interruption to hydrological regimes. • RA.1 - physical disturbance/ damage, non-physical disturbance and interruption to hydrological regimes. • RA.5 - physical disturbance/ damage, non-physical disturbance and interruption to hydrological regimes. • Bromyard – interruption 			

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		<p>to hydrological regimes.</p> <ul style="list-style-type: none"> Ross-on-Wye - physical disturbance/ damage, non-physical disturbance and interruption to hydrological regimes. 			
Wye Valley Woodlands	<p>Annex I habitats that are a primary reason for site selection: Beech forests <i>Asperulo-Fagetum</i> (considered to be one of the best areas in the UK), Tilio-Acerion forests of slopes, screes and ravines (priority feature) (considered to be one of the best areas in the UK), Taxus baccata woods of the British Isles (priority feature) (considered to be one of the best areas in the UK). Annex II species present as a qualifying feature, but not a primary reason for site selection: Lesser horseshoe bat <i>Rhinolophus hipposideros</i>, 51-100 residents (the area is considered to support a significant presence).</p>	<p>Physical loss of habitat as a result of development (infrastructure, housing, employment, sport/recreation facilities or waste management facilities); noise, light and air pollution resulting from construction activities and/or an increase in vehicle traffic; Erosion/ trampling and noise pollution as a result of recreation pressures; and interruption to hydrological regimes as a result of increased demand for water abstraction and treatment.</p> <p>The following policy options were considered most likely to result in an adverse impact on this site:</p> <ul style="list-style-type: none"> E.2 - physical disturbance/ damage, non-physical 	<p>The preferred spatial strategy for Ross-on-Wye was identified as possibly having an adverse effect on the integrity of this site in particular; however a number of other proposals could potentially affect any sites within the county, including this one. As such, any of the potential impacts identified at the screening stage may occur in the vicinity of the site, depending on the location in which any development arising from the proposals eventually occurs.</p> <p>This site lies within 10km of Ross-on-Wye; therefore may be affected by noise, vibration and light pollution as a result of the development proposed in and around the town under the spatial option for Ross-on-Wye. A number of probable or confirmed roosting sites for lesser horseshoe bats lie within close proximity of the proposed strategic housing site at Hildersley, which may be adversely affected by light pollution. However, more information is required with regards to the type and size of the roosts, in order to make an accurate judgement about the likely extent of the effects.</p> <p>Levels of nitrogen deposition and ozone are already exceeding critical loads at the site; meaning that any increased air pollution here may be particularly damaging. The A466, which is a main route leading to the M48, lies within 200m of the site boundary, and it is main roads such as this which are considered most likely to see significant</p>	<p>Further analysis is necessary during the planning application stage, in order to determine whether adverse effects in terms of physical loss/damage to habitat will occur and/or increased air pollution from an increase in nearby vehicle traffic, once the precise location of development resulting from the Core Strategy proposals is known.</p> <p>The Protection of Natural and Historic Assets policy should help to ensure this analysis takes place at the planning application stage.</p> <p>Further information about forecast increases in traffic along the A466 into Herefordshire is</p>	<p>Yes, mitigation provided by policy NH2 should ensure that future development does not result in damage from increased air pollution.</p>

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	<p>Conditions needed to support site integrity:</p> <ul style="list-style-type: none"> • Implementation of appropriate management plans • No loss or damage to hibernation sites • Maintain appropriate woodland management regime 	<p>disturbance, air pollution and interruption to hydrological regimes.</p> <ul style="list-style-type: none"> • GT.1 - physical disturbance/ damage, non-physical disturbance, air pollution and interruption to hydrological regimes. • OS.2 - physical disturbance/ damage and non-physical disturbance. • SC.1 - physical disturbance/ damage and non-physical disturbance. • WI - physical disturbance/ damage and non-physical disturbance. • EC.1 - physical disturbance/ damage, air pollution and interruption to hydrological regimes. • EC2 - physical disturbance/ damage, non-physical disturbance, air pollution and interruption to hydrological regimes. • Ross-on-Wye - physical damage/disturbance. <p>However, effects on this site may result from the following policy options which do not specify spatial locations for</p>	<p>increases in traffic as a result of development such as that proposed within the Core Strategy. As such, it is considered likely that an increase in air pollution may adversely affect this site; however no data is currently available with regards to the likely increases in traffic along this route, therefore the likelihood of adverse effects remains uncertain. The likelihood of other forms of air pollution having an adverse impact on this site will depend on the location of development such as waste facilities (incorporating thermal treatment) or agricultural works, which may result in air pollution, in relation to the site. This will not be known until the planning application stage. However, such air pollution would be localised and for those spatial options where the proposed locations for development have been indicated, none is proposed within close proximity of this site.</p> <p>It is not possible at this stage to make a judgement about the likelihood of there being any physical loss of habitat, due to a lack of information about the precise location of development proposed. Any development resulting from the preferred options for the general policies will be assessed at the planning application stage for its potential to result in habitat damage/loss. However, for the spatial options where the proposed locations for development have been indicated, none is proposed within close proximity of this site.</p> <p>This site is relatively large in size and its location means that it is easily accessible from the town of Ross-on-Wye. Under the preferred spatial strategy for the town, 1,000 new homes are proposed (in line with RSS allocations), meaning that pressure for recreation/amenity space is likely to increase in the surrounding area. No information is available about the current level or type of recreation use of this site;</p>	<p>required.</p> <p>The implementation of good practice construction techniques should help to mitigate noise and vibration effects resulting from new development. Light pollution effects may be partially mitigated by the use of appropriate street lighting and by the provision of high quality alternative habitat for bat roosting sites (e.g. good quality hedgerows) further away from development.</p> <p>The Open Space, Sport and Recreation (now split out into three separate policies covering open space, sport and recreation facilities and protection of existing sports and recreation facilities and Green Infrastructure policies which are to be included in the Core Strategy may have the potential to</p>	

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		<p>development:</p> <ul style="list-style-type: none"> • E.1 – physical disturbance/ damage, non-physical disturbance, air pollution and interruption to hydrological regimes. • E.2 - physical disturbance/ damage, non-physical disturbance, air pollution and interruption to hydrological regimes. • GT.1 - physical disturbance/ damage, non-physical disturbance and air pollution. • M.1 – physical disturbance/ damage and non-physical disturbance. • O.S2 - physical disturbance/ damage and non-physical disturbance. • SC.1 - physical disturbance/ damage and non-physical disturbance. • W.1 - physical disturbance/ damage and non-physical disturbance. • EC.1 - physical disturbance/ damage, air pollution and interruption to hydrological regimes. • EC.2 - physical disturbance/ damage, air 	<p>however due to the scale and proximity of the housing development proposed, an adverse impact on integrity cannot be ruled out.</p> <p>The integrity of this site is not considered likely to be significantly adversely affected by changes to hydrological regimes as the qualifying features are not particularly vulnerable to changes in water quality/quantity.</p>	<p>mitigate any adverse impacts arising from increased recreation use of the site.</p>	

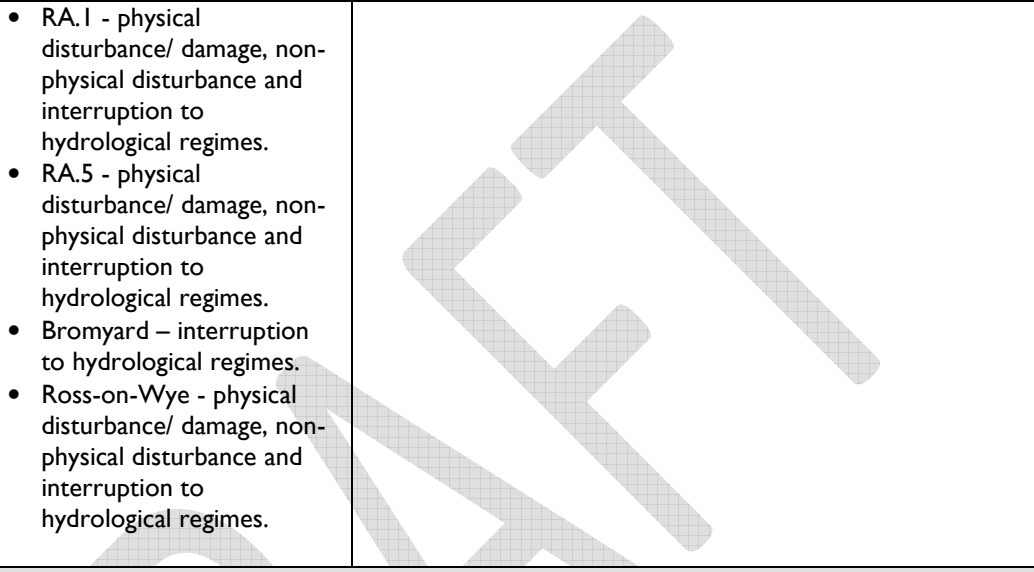
European site	Qualifying Features	Types of activities identified at the screening stage that may have an adverse impact on the integrity of European sites and policy option in Core Strategy identified as giving rise to the effect	Is an adverse effect on site integrity likely to result from any of the Preferred Options?	Recommendations for mitigating effects within the Core Strategy or further work for the HRA	If the recommendations are implemented, would it be possible that there would be no adverse effect on site integrity?
		<p>pollution and interruption to hydrological regimes.</p> <ul style="list-style-type: none"> • RA.1 - physical disturbance/ damage, non-physical disturbance and interruption to hydrological regimes. • RA.5 - physical disturbance/ damage, non-physical disturbance and interruption to hydrological regimes. • Bromyard – interruption to hydrological regimes. • Ross-on-Wye - physical disturbance/ damage, non-physical disturbance and interruption to hydrological regimes. 			
SPAs					
Severn Estuary	Annex I birds and regularly occurring migratory birds not listed on Annex I: Internationally important populations of regularly occurring Annex I species: Gadwall <i>Anas strepera</i> 282 Individuals (0.9% of the population, 5 year peak mean 1991/92-1995/96), Greater	Physical loss of habitat as a result of development (infrastructure, housing, employment, sport/recreation facilities or waste management facilities); noise, light and air pollution resulting from construction activities and/or an increase in vehicle traffic; Erosion/ trampling and noise pollution as a result of	None of the Core Strategy Preferred Options proposals that were screened were considered likely to affect this site in particular; however a number of proposals could potentially affect any sites within the county, including this one. As such, any of the potential impacts identified at the screening stage may occur in the vicinity of the site, depending on the location in which any development arising from the proposals eventually occurs. Light and air pollution are not considered likely to have an adverse effect on the qualifying features of this site.	The Open Space, Sport and Recreation and Green Infrastructure policies which are to be included in the Core Strategy may have the potential to mitigate any adverse impacts arising from increased recreation use of the site.	Yes, mitigation provided by policy OS.1 should ensure that future development does not result in damage from increased recreation pressure. The measures included in policy WM.1 should ensure that water efficiency measures are included in all types of new development, and

European site	Qualifying Features	Types of activities identified at the screening stage that may have an adverse impact on the integrity of European sites and policy option in Core Strategy identified as giving rise to the effect	Is an adverse effect on site integrity likely to result from any of the Preferred Options?	Recommendations for mitigating effects within the Core Strategy or further work for the HRA	If the recommendations are implemented, would it be possible that there would be no adverse effect on site integrity?
	<p>White-fronted Goose <i>Anser albifrons</i> 2664 Individuals (0.4% of the population, 5 year peak mean 1991/92-1995/96), Dunlin <i>Caldidris alpina</i> 44624 individuals (3.3% of the population, 5 year peak mean 1991/92-1995/96), Beswick Swan <i>Cygnus columbianus bewickii</i> 280 individuals (3.9% of the GB population, 5 year peak mean 1991/92-1995/96), Common Shelduck <i>Tadorna tadorna</i> 3330 individuals (1.1% of the population, 5 year peak mean 1991/92-1995/96), Common Redshank <i>Tringa totanus</i> 2330 individuals (1.3% of the population, 5 year peak mean 1991/92-1995/96). Internationally important assemblage of birds, over winter the area regularly supports: 84317 waterfowl (5 year peak mean 01/04/1998), including all of the above</p>	<p>recreation pressures; and interruption to hydrological regimes as a result of increased demand for water abstraction and treatment.</p> <p>None of the policy options were considered likely to result in an adverse impact on this site in particular.</p> <p>However, effects on this site may result from the following policy options which do not specify spatial locations for development:</p> <ul style="list-style-type: none"> • E.1 – physical disturbance/ damage, non-physical disturbance, air pollution and interruption to hydrological regimes. • E.2 - physical disturbance/ damage, non-physical disturbance, air pollution and interruption to hydrological regimes. • GT.1 - physical disturbance/ damage, non-physical disturbance and air pollution. • M.1 – physical disturbance/ damage and non-physical 	<p>Noise pollution or vibration caused by development is unlikely to affect the birds which are the qualifying features of this site; due to the distance of the site from Herefordshire and therefore the potential development sites within the county (the site lies at the far edge of the 15km buffer around the county boundary).</p> <p>It is not likely that the Core Strategy proposals will result in physical loss of habitat at this site, due its distance from the outside of the county boundary – Core Strategy proposals will only result in development within Herefordshire itself.</p> <p>The site is vulnerable to tourism-based activities and disturbance. Any increase in population in the surrounding area, e.g. as a result of nearby housing development, which may increase pressure for recreation and amenity space, is therefore considered likely to have an adverse effect on the site's integrity.</p> <p>The qualifying features of this site are dependent on the tidal regime, therefore any changes to hydrological regimes e.g. through increased abstraction demand as a result of new housing development nearby, is likely to have an adverse effect on site integrity. It is uncertain at this stage whether housing development may occur within fairly close proximity of the site (e.g. housing proposed under preferred option RAI); however the site is particularly vulnerable to any increase in water abstraction. According to the Environment Agency, it is unlikely to grant any new abstraction licences in any Water Resource Management Unit (WRMU) within Herefordshire as they are all currently at 'no water available' status. In addition, Welsh Water is not forecasting any supply deficits in Herefordshire aside</p>		<p>that water resources are protected.</p>

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	<p>mentioned species.</p> <p>Conditions needed to support site integrity:</p> <ul style="list-style-type: none"> • Maintain tidal regime • Prevention of water and air borne pollution • Control of recreational activities • Control of extraction and other industrial activities • Protection of bird sites 	<p>disturbance.</p> <ul style="list-style-type: none"> • O.S2 - physical disturbance/ damage and non-physical disturbance. • SC.1 - physical disturbance/ damage and non-physical disturbance. • W.1 - physical disturbance/ damage and non-physical disturbance. • EC.1 - physical disturbance/ damage, air pollution and interruption to hydrological regimes. • EC.2 - physical disturbance/ damage, air pollution and interruption to hydrological regimes. • RA.1 - physical disturbance/ damage, non-physical disturbance and interruption to hydrological regimes. • RA.5 - physical disturbance/ damage, non-physical disturbance and interruption to hydrological regimes. • Bromyard – interruption to hydrological regimes. • Ross-on-Wye - physical disturbance/ damage, non-physical disturbance and 	<p>from the Vowchurch WRMU which makes up only 2% of the county, and so it states that it can meet forecast growth without new or increased abstraction licenses. However, this is dependent on the outcomes of the EA's Review of Consents work and Welsh Water is delaying the publication of its WRMP until this has been carried out. As such, it is not yet possible to rule out the possibility of water abstraction having an adverse impact on the integrity of this site.</p>		

European site	Qualifying Features	Types of activities identified at the screening stage that may have an adverse impact on the integrity of European sites and policy option in Core Strategy identified as giving rise to the effect	Is an adverse effect on site integrity likely to result from any of the Preferred Options?	Recommendations for mitigating effects within the Core Strategy or further work for the HRA	If the recommendations are implemented, would it be possible that there would be no adverse effect on site integrity?
		interruption to hydrological regimes.			
Walmore Common	<p>Internationally important populations of regularly occurring migratory bird species not listed on Annex I (over winter): Bewick Swan <i>Cygnus columbianus bewickii</i> 104 individuals, 1.4% of Great Britain's population, 5 year peak mean 1991/92 to 1995/96.</p> <p>Conditions needed to support site integrity:</p> <ul style="list-style-type: none"> Maintain water quality and water levels Grassland management regime 	<p>Physical loss of habitat as a result of development (infrastructure, housing, employment, sport/recreation facilities or waste management facilities); noise, light and air pollution resulting from construction activities and/or an increase in vehicle traffic; Erosion/trampling and noise pollution as a result of recreation pressures; and interruption to hydrological regimes as a result of increased demand for water abstraction and treatment.</p> <p>None of the policy options were considered likely to result in an adverse impact on this site in particular.</p> <p>However, effects on this site may result from the following policy options which do not specify spatial locations for development:</p> <ul style="list-style-type: none"> E.1 – physical disturbance/ 	<p>None of the Core Strategy Preferred Options proposals that were screened were considered likely to affect this site in particular; however a number of proposals could potentially affect any sites within the county, including this one. As such, any of the potential impacts identified at the screening stage may occur in the vicinity of the site, depending on the location in which any development arising from the proposals eventually occurs.</p> <p>Light and air pollution are not considered likely to have an adverse effect on the qualifying features of this site.</p> <p>The Bewick Swan may be potentially adversely affected by noise or vibration resulting from development; however the site is located approximately 9km from the Herefordshire boundary, therefore any noise resulting from development activities within the county is considered unlikely to affect the qualifying features of this site due to the distance of the site from any potential development occurring in Herefordshire.</p> <p>It is not likely that the Core Strategy proposals will result in physical loss of habitat at this site, due its distance from the outside of the county boundary – Core Strategy proposals will only result in development within Herefordshire itself.</p> <p>The location of this site means that it is easily accessible from the town of Ross-on-Wye. Under the preferred spatial strategy for the town, 1,000 new homes are proposed (in line with RSS allocations), meaning that pressure for</p>	<p>The Open Space, Sport and Recreation (now split out into three separate policies covering open space, sport and recreation facilities and protection of existing sports and recreation facilities and Green Infrastructure policies which are to be included in the Core Strategy may have the potential to mitigate any adverse impacts arising from increased recreation use of the site.</p>	<p>Yes, mitigation provided by policy OS.1 should ensure that future development does not result in damage from increased recreation pressure. The measures included in policy WM.1 should ensure that water efficiency measures are included in all types of new development, and that water resources are protected.</p>

European site	Qualifying Features	Types of activities identified at the screening stage that may have an adverse impact on the integrity of European sites and policy option in Core Strategy identified as giving rise to the effect	Is an adverse effect on site integrity likely to result from any of the Preferred Options?	Recommendations for mitigating effects within the Core Strategy or further work for the HRA	If the recommendations are implemented, would it be possible that there would be no adverse effect on site integrity?
		<p>damage, non-physical disturbance, air pollution and interruption to hydrological regimes.</p> <ul style="list-style-type: none"> • E.2 - physical disturbance/ damage, non-physical disturbance, air pollution and interruption to hydrological regimes. • GT.1 - physical disturbance/ damage, non-physical disturbance and air pollution. • M.1 – physical disturbance/ damage and non-physical disturbance. • O.S2 - physical disturbance/ damage and non-physical disturbance. • SC.1 - physical disturbance/ damage and non-physical disturbance. • W.1 - physical disturbance/ damage and non-physical disturbance. • EC.1 - physical disturbance/ damage, air pollution and interruption to hydrological regimes. • EC.2 - physical disturbance/ damage, air pollution and interruption to hydrological regimes. 	<p>recreation/amenity space is likely to increase in the surrounding area. As such, an adverse effect on the integrity of this site cannot be ruled out.</p> <p>The maintenance of appropriate hydrological regimes is of particular importance at this site, as the natural winter flooding plays an important role in maintaining appropriate conditions for the site's swans. As such, any development in the vicinity of the site which may affect water quantity, e.g. through increased demand for water abstraction, is likely to adversely affect site integrity. It is uncertain at this stage whether housing development may occur within fairly close proximity of the site (e.g. housing proposed under preferred option RA1); however the site is particularly vulnerable to any increase in water abstraction. According to the Environment Agency, it is unlikely to grant any new abstraction licences in any Water Resource Management Unit (WRMU) within Herefordshire as they are all currently at 'no water available' status. In addition, Welsh Water is not forecasting any supply deficits in Herefordshire aside from the Vowchurch WRMU which makes up only 2% of the county, and so it states that it can meet forecast growth without new or increased abstraction licenses. However, this is dependent on the outcomes of the EA's Review of Consents work and Welsh Water is delaying the publication of its WRMP until this has been carried out. As such, it is not yet possible to rule out the possibility of water abstraction having an adverse impact on the integrity of this site.</p>		

European site	Qualifying Features	Types of activities identified at the screening stage that may have an adverse impact on the integrity of European sites and policy option in Core Strategy identified as giving rise to the effect	Is an adverse effect on site integrity likely to result from any of the Preferred Options?	Recommendations for mitigating effects within the Core Strategy or further work for the HRA	If the recommendations are implemented, would it be possible that there would be no adverse effect on site integrity?
		<ul style="list-style-type: none"> • RA.1 - physical disturbance/ damage, non-physical disturbance and interruption to hydrological regimes. • RA.5 - physical disturbance/ damage, non-physical disturbance and interruption to hydrological regimes. • Bromyard – interruption to hydrological regimes. • Ross-on-Wye - physical disturbance/ damage, non-physical disturbance and interruption to hydrological regimes. 			
Ramsar Sites					
Severn Estuary	Under RAMSAR criterion 5 Assemblages of international importance species with peak counts in winter: 70919 waterfowl (5 year peak mean 1998/99-2002/03). RAMSAR criterion 6 species/populations occurring at levels of international importance and qualifying species/populations (as identified at designation):	Physical loss of habitat as a result of development (infrastructure, housing, employment, sport/recreation facilities or waste management facilities); noise, light and air pollution resulting from construction activities and/or an increase in vehicle traffic; Erosion/trampling and noise pollution as a result of recreation pressures; and interruption to	None of the Core Strategy Preferred Options proposals that were screened were considered likely to affect this site in particular; however a number of proposals could potentially affect any sites within the county, including this one. As such, any of the potential impacts identified at the screening stage may occur in the vicinity of the site, depending on the location in which any development arising from the proposals eventually occurs. Light and air pollution are not considered likely to have an adverse effect on the qualifying features of this site. Noise pollution and vibration are considered unlikely to have an impact on the qualifying features of this site due to	The Open Space, Sport and Recreation and Green Infrastructure policies which are to be included in the Core Strategy may have the potential to mitigate any adverse impacts arising from increased recreation use of the site.	Yes, mitigation provided by policy OS.1 should ensure that future development does not result in damage from increased recreation pressure. The measures included in policy WM.1 should ensure that water efficiency measures are included in all types of new development, and that water resources are protected.

European site	Qualifying Features	Types of activities identified at the screening stage that may have an adverse impact on the integrity of European sites and policy option in Core Strategy identified as giving rise to the effect	Is an adverse effect on site integrity likely to result from any of the Preferred Options?	Recommendations for mitigating effects within the Core Strategy or further work for the HRA	If the recommendations are implemented, would it be possible that there would be no adverse effect on site integrity?
	<p>species with peak counts in winter: Tundra swan <i>Cygnus columbianus bewickii</i>, NW Europe, 229 individuals, representing an average of 2.8% of the GB population (5 year peak mean 1998/99-2002/03), greater white-fronted goose <i>Anser albifrons</i>, NW Europe, 2076 individuals representing an average of 35.8% of the GB population (5 year peak mean for 1996/97-2000/01), common shelduck <i>Tadorna tadorna</i>, NW Europe, 3223 individuals, representing an average of 1% of the population (5 year peak mean 1998/99-2002/03), Gadwall <i>Anas strepera</i>, NW Europe, 241 individuals, representing an average of 1.4% of the GB population (5 year peak mean 1998/99-2002/03), Dunlin <i>Calidris alpina</i>, W Siberia/W Europe, 25082 individuals, representing an average</p>	<p>hydrological regimes as a result of increased demand for water abstraction and treatment.</p> <p>None of the policy options were considered likely to result in an adverse impact on this site in particular.</p> <p>However, effects on this site may result from the following policy options which do not specify spatial locations for development:</p> <ul style="list-style-type: none"> • E.1 – physical disturbance/ damage, non-physical disturbance, air pollution and interruption to hydrological regimes. • E.2 - physical disturbance/ damage, non-physical disturbance, air pollution and interruption to hydrological regimes. • GT.1 - physical disturbance/ damage, non-physical disturbance and air pollution. • M.1 – physical disturbance/ damage and non-physical disturbance. • O.S2 - physical 	<p>the distance of the site from any potential development locations within Herefordshire (the site lies at the far edge of the 15k buffer around the county boundary). It is unlikely that noise or vibration would affect bird species from this distance.</p> <p>It is not likely that the Core Strategy proposals will result in physical loss of habitat at this site, due its distance from the outside of the county boundary – Core Strategy proposals will only result in development within Herefordshire itself.</p> <p>The site is large sized and is vulnerable to tourism-based activities and disturbance. Any increase in population in the surrounding area, e.g. as a result of nearby housing development, may increase pressure for recreation and amenity space, and therefore an adverse effect on the site's integrity from recreation pressure cannot be ruled out.</p> <p>The qualifying features of this site are dependent on the tidal regime, therefore any changes to hydrological regimes e.g. through increased abstraction demand as a result of new housing development nearby, is likely to have an adverse effect on site integrity. It is uncertain at this stage whether housing development may occur within fairly close proximity of the site (e.g. housing proposed under preferred option RA1); however the site is particularly vulnerable to any increase in water abstraction. According to the Environment Agency, it is unlikely to grant any new abstraction licences in any Water Resource Management Unit (WRMU) within Herefordshire as they are all currently at 'no water available' status. In addition, Welsh Water is not forecasting any supply deficits in Herefordshire aside from the Vowchurch WRMU which makes up only 2% of the</p>		

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	<p>of 1.8% of the population (5 year peak mean 1998/99-2002/03),</p> <p>Common redshank <i>Tringa tetanus</i>, 2616 individuals, representing an average of 1% of the population (5 year peak mean 1998/99-2002/03). Species/populations identified subsequent to designation for possible future consideration under criterion 6. Species regularly supported during the breeding season: Lesser black-backed gull <i>Larus fuscus graellsii</i>, W Europe/Mediterranean/W Africa, 4167 apparently occupied nests, representing an average of 2.8% of the breeding population (seabird 2000 Census) Species with peak counts in spring/autumn:</p> <p>Ringed plover <i>Charadrius hiaticula</i>, Europe/Northwest Africa, 740 individuals, representing an average of 1% of the population (5</p>	<p>disturbance/ damage and non-physical disturbance.</p> <ul style="list-style-type: none"> • SC.1 - physical disturbance/ damage and non-physical disturbance. • W.1 - physical disturbance/ damage and non-physical disturbance. • EC.1 - physical disturbance/ damage, air pollution and interruption to hydrological regimes. • EC.2 - physical disturbance/ damage, air pollution and interruption to hydrological regimes. • RA.1 - physical disturbance/ damage, non-physical disturbance and interruption to hydrological regimes. • RA.5 - physical disturbance/ damage, non-physical disturbance and interruption to hydrological regimes. • Bromyard – interruption to hydrological regimes. • Ross-on-Wye - physical disturbance/ damage, non-physical disturbance and interruption to hydrological regimes. 	<p>county, and so it states that it can meet forecast growth without new or increased abstraction licenses. However, this is dependent on the outcomes of the EA's Review of Consents work and Welsh Water is delaying the publication of its WRMP until this has been carried out. As such, it is not yet possible to rule out the possibility of water abstraction having an adverse impact on the integrity of this site.</p>		

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	<p>year peak mean 1998/99-2002/03) Species with peak counts in winter:</p> <p>Eurasian teal <i>Anas crecca</i>, NW Europe, 4456 individuals, representing an average of 1.1% of the population (5 year peak mean 1998/99-2002/03).</p> <p>Species with peak counts in winter: Northern pintail <i>Anas acuta</i>, NW Europe, 756 individuals, representing an average of 1.2% of the population (5 year peak mean 1998/99-2002/03).</p> <p>Species occurring at levels of international importance on the site:</p> <p>Fish – <i>Alosa alosa</i> (IUCN Red data book – threatened; habitats directive Annex II, Annex V, SI 102), <i>Alosa fallax</i> (IUCN Red data book – threatened Habitats Directive Annex II, Annex V, SI 103), <i>Lampetra fluviatilis</i> (IUCN Red data book – threatened; Habitats Directive Annex II,</p>				

European site	Qualifying Features	Types of activities identified at the screening stage that may have an adverse impact on the integrity of European sites and policy option in Core Strategy identified as giving rise to the effect	Is an adverse effect on site integrity likely to result from any of the Preferred Options?	Recommendations for mitigating effects within the Core Strategy or further work for the HRA	If the recommendations are implemented, would it be possible that there would be no adverse effect on site integrity?
	<p>S1099), <i>Petromyzon marinus</i> (Habitats Directive Annex II, S1095).</p> <p>Conditions needed to support site integrity:</p> <ul style="list-style-type: none"> • Maintain tidal regime • Prevention of water and air borne pollution • Control of recreational and other human activities • Protection of bird sites 				
Walmore Common	<p>Ramsar criterion 6 – species/populations occurring at levels of international importance: Qualifying Species/populations (as identified at designation): Species with peak counts in winter: Tundra swan, <i>Cygnus columbianus bewickii</i>, NW Europe 43 individuals, representing an average of 0.5% of the GB population (5 year peak mean 1998/9- 2002/3).</p>	<p>Physical loss of habitat as a result of development (infrastructure, housing, employment, sport/recreation facilities or waste management facilities); noise, light and air pollution resulting from construction activities and/or an increase in vehicle traffic; Erosion/trampling and noise pollution as a result of recreation pressures; and interruption to hydrological regimes as a result of increased demand for water abstraction and</p>	<p>None of the Core Strategy Preferred Options proposals that were screened were considered likely to affect this site in particular; however a number of proposals could potentially affect any sites within the county, including this one. As such, any of the potential impacts identified at the screening stage may occur in the vicinity of the site, depending on the location in which any development arising from the proposals eventually occurs.</p> <p>Light and air pollution are not considered likely to have an adverse effect on the qualifying features of this site.</p> <p>The swan may be potentially adversely affected by noise or vibration resulting from development; however the site is located approximately 9km from the Herefordshire boundary, therefore any noise or vibration resulting from development activities within the county is considered</p>	<p>The Open Space, Sport and Recreation and Green Infrastructure policies which are to be included in the Core Strategy may have the potential to mitigate any adverse impacts arising from increased recreation use of the site.</p>	<p>Yes, mitigation provided by policy OS.I should ensure that future development does not result in damage from increased recreation pressure. The measures included in policy WM.I should ensure that water efficiency measures are included in all types of new development, and that water resources are protected.</p>

European site	Qualifying Features	Types of activities identified at the screening stage that may have an adverse impact on the integrity of European sites and policy option in Core Strategy identified as giving rise to the effect	Is an adverse effect on site integrity likely to result from any of the Preferred Options?	Recommendations for mitigating effects within the Core Strategy or further work for the HRA	If the recommendations are implemented, would it be possible that there would be no adverse effect on site integrity?
		<p>treatment.</p> <p>None of the policy options were considered likely to result in an adverse impact on this site in particular.</p> <p>However, effects on this site may result from the following policy options which do not specify spatial locations for development:</p> <ul style="list-style-type: none"> • E.1 – physical disturbance/ damage, non-physical disturbance, air pollution and interruption to hydrological regimes. • E.2 - physical disturbance/ damage, non-physical disturbance, air pollution and interruption to hydrological regimes. • GT.1 - physical disturbance/ damage, non-physical disturbance and air pollution. • M.1 – physical disturbance/ damage and non-physical disturbance. • O.S2 - physical disturbance/ damage and non-physical disturbance. • SC.1 - physical 	<p>unlikely to affect the qualifying features of this site due to the distance of the site from any potential development occurring in Herefordshire</p> <p>It is not likely that the Core Strategy proposals will result in physical loss of habitat at this site, due its distance from the outside of the county boundary – Core Strategy proposals will only result in development within Herefordshire itself.</p> <p>The location of this site means that it is easily accessible from the town of Ross-on-Wye. Under the preferred spatial strategy for the town, 1,000 new homes are proposed (in line with RSS allocations), meaning that pressure for recreation/amenity space is likely to increase in the surrounding area. As such, an adverse effect on the integrity of this site cannot be ruled out.</p> <p>The maintenance of appropriate hydrological regimes is of particular importance at this site, as the natural winter flooding plays an important role in maintaining appropriate conditions for the site’s swans. As such, any development in the vicinity of the site which may affect water quantity, e.g. through increased demand for water abstraction is likely to adversely affect site integrity. It is uncertain at this stage whether housing development may occur within fairly close proximity of the site (e.g. housing proposed under preferred option RAI); however the site is particularly vulnerable to any increase in water abstraction. According to the Environment Agency, it is unlikely to grant any new abstraction licences in any Water Resource Management Unit (WRMU) within Herefordshire as they are all currently at ‘no water available’ status. In addition, Welsh Water is not forecasting any supply deficits in Herefordshire aside</p>		

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		<p>disturbance/ damage and non-physical disturbance.</p> <ul style="list-style-type: none"> • W.1 - physical disturbance/ damage and non-physical disturbance. • EC.1 - physical disturbance/ damage, air pollution and interruption to hydrological regimes. • EC.2 - physical disturbance/ damage, air pollution and interruption to hydrological regimes. • RA.1 - physical disturbance/ damage, non-physical disturbance and interruption to hydrological regimes. • RA.5 - physical disturbance/ damage, non-physical disturbance and interruption to hydrological regimes. • Bromyard – interruption to hydrological regimes. • Ross-on-Wye - physical disturbance/ damage, non-physical disturbance and interruption to hydrological regimes. 	<p>from the Vowchurch WRMU which makes up only 2% of the county, and so it states that it can meet forecast growth without new or increased abstraction licenses. However, this is dependent on the outcomes of the EA's Review of Consents work and Welsh Water is delaying the publication of its WRMP until this has been carried out. As such, it is not yet possible to rule out the possibility of water abstraction having an adverse impact on the integrity of this site.</p>		

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Appendix 3
CCW Consultation Comments on the Interim HRA
Report

Consultation responses received in relation to the draft Habitats Regulations Assessment Report accompanying the Herefordshire Core Strategy Preferred Options Consultation (August – September 2010)

Consultee	Response	Proposed Action / Justification	Outcome
Habitats Regulations Assessment			
General comments			
Countryside Council for Wales	CCW welcomes the efforts made by Herefordshire in engaging with this process and in involving stakeholders at all stages of plan and appraisal development.	Noted. No action required.	No change to HRA Report.
Countryside Council for Wales	CCW notes the intention to develop approximately 4 additional general policies and a spatial option for Hereford. Given the potential for 'in combination' effects between policies (and with other plans and projects) and in particular, the potential for in combination effects in relation to policies involving proposed development in and affecting the River Wye SAC, it is suggested that the HRA process and production of this interim report might have 'waited' until these additional policies/strategies were produced and available for assessment.	Noted. The report was clearly described as an Interim HRA Report, and explanation was provided in paragraph 1.6.	Full HRA Report covers all Core Strategy policies.
Countryside Council for Wales	CCW notes that the screening review of potential in combination effects considered only 'plans' and not also 'projects' as required by the Habitats Directive. In addition, CCW would suggest that to rely on a plan list produced three years ago and for another type of assessment process may not be appropriate in terms of the HRA process given that many additional plans are likely to be either approved and/or in development. It is therefore suggested that the review of plans and projects with potential 'in combination' effects is reconsidered.	Noted. Approach to in combination effects still to be confirmed with NE and CCW, to be discussed at November HRA meeting with consultees.	Ongoing.
Countryside Council for Wales	With regards to our comments on Appendix 1 and 2 to this HRA, our main concerns relate to the apparent omission of some 'features of interest' from the assessment process. For example; potential effects on otter do not appear to have been considered in the context of the Wye SAC. Our main concerns however, relate to water related issues – notably water quality and potential effects of abstraction. CCW would welcome the opportunity to discuss these	Noted. CCW, Welsh Water, NE and EA invited to a November HRA meeting to discuss these issues.	Ongoing.

Consultee	Response	Proposed Action / Justification	Outcome
	issues with Herefordshire and Dwr Cymru at the earliest possible opportunity.		
Specific comments			
Countryside Council for Wales	1.6 CCW notes the intention to develop approximately 4 additional general policies and a spatial option for Hereford. Given the potential for 'in combination' effects between policies (and with other plans and projects) and in particular, the potential for in combination effects in relation to policies involving proposed development in and effecting the River Wye SAC, it is suggested that the HRA process and production of this interim report should have 'waited' until these additional policies/strategies were produced and available for assessment.	Noted. The report was clearly described as an Interim HRA Report, and explanation was provided in paragraph 1.6.	Full HRA Report covers all Core Strategy policies.
Countryside Council for Wales	1.7 Reference should be made to the Conservation of Habitats and Species Regulations 2010 and to the 2007 Regulations which have been superseded (footnote 1). In addition, given that the LDF proposal potentially affects European Sites within Wales, it might be useful to refer to TAN 5 as well as PPS 9. CCW would suggest that Annex 6 to TAN, which defines the HRA process for local development plans, may be useful as regards the methodology and scope of this HRA.	Update reference.	Addressed in full HRA Report.
Countryside Council for Wales	1.12 Annex 6 to TAN 5 in Wales describes the HRA process for development plans and this useful guidance is supplemented in draft CCW guidance on the HRA of plans. CCW would suggest that whilst the EC guidance is extremely useful, it may be more appropriate to use HRA methodology and guidance specifically developed for the development plan process in the UK. Similarly, while the DCLG guidance and RSPB guidance is also extremely useful, both predate an important court ruling on the HRA process and elements of the guidance may be a little outdated.	Noted, this guidance will be consulted and drawn upon.	Addressed in full HRA Report.
Countryside	1.15 and Table 1.12	As above.	As above.

Consultee	Response	Proposed Action / Justification	Outcome
Council for Wales	See comments on 1.6 above.		
Countryside Council for Wales	Non-physical disturbance Categories should include vibration.	Agreed, this will be added.	Addressed in full HRA Report.
Countryside Council for Wales	Water Table/Availability Categories should include water temperature and periodicity of low/high flows.	Agreed, this will be added.	Addressed in full HRA Report.
Countryside Council for Wales	Toxic Contamination Examples need to include diffuse air and soil pollution as well as diffuse water pollution. In addition, consideration needs to be given to storm water runoff e.g. from sealed surfaces and combined storm water/sewerage systems. Clarification is required as to what is understood by 'domestic waste'.	Agreed, this will be added.	Addressed in full HRA Report.
Countryside Council for Wales	Biological Disturbance Consideration needs to be given to disturbance at different stages /cycles of biodiversity including flight lines, roosting, foraging, breeding and migration.	Agreed, this will be added.	Addressed in full HRA Report.
Countryside Council for Wales	2.1 CCW is concerned by the statement that 'the screening stage does not usually go into as much detail as the work undertaken during the appropriate assessment stage'. The screening and appropriate assessment stages of the HRA process are different and should not be confused. In addition, no mention has been made of the scoping stage of the HRA process. Screening involves: <ul style="list-style-type: none"> • Identification of all European Sites potentially affected by the plan • Acquisition, examination and understanding of the conservation objectives of each interest feature of each European Site potentially affected. • Consideration of the plans/policies and the changes that they may cause that may be relevant to the European Sites. • Consideration of whether the plan under scrutiny is connected with or necessary for European Site 	Noted, this will be clarified.	Addressed in full HRA Report.

Consultee	Response	Proposed Action / Justification	Outcome
	management. Appropriate Assessment is the third stage of the HRA process and should ideally only be progressed once the potential for significant effects on European sites (and which sites are potentially affected) and the scope and method of assessment has been agreed with Natural England and Countryside Council for Wales.		
Countryside Council for Wales	2.2 This section makes reference to Natural England's response to the HRA screening of Core Strategy policies however; no reference is made to CCW comments and responses.	CCW did not provide consultation comments prior to the Preferred Options stage.	No action taken.
Countryside Council for Wales	2.3 With regard to the proposal to undertake additional screening of 'remaining general policies and the spatial strategy for Hereford', see comments on 1.6 above.	Noted. Screening of all Core Strategy policies will be carried out.	Addressed in full HRA Report.
Countryside Council for Wales	2.5 See comments on 2.2 above. Clarification is required as to what is meant by Natural England's 'broad' agreement with the findings.	Natural England responded 'yes' to the consultation questions on the Place Shaping Paper Sustainability Appraisal and HRA: "Do you agree with the European sites taken into the AA stage of the HRA?" and "Do you agree with the identified effects of the options?".	Addressed in full HRA Report.
Countryside Council for Wales	2.6 The potential for a plan or project to have significant effects on a European Site is not restricted to spatial distance. CCW would therefore seek reassurance that all the relevant tributaries of the Wye SAC will be considered in this assessment process.	Noted. Relevant tributaries of the River Wye SAC have been considered.	Addressed in full HRA Report.
Countryside Council for Wales	2.1.1 See comments on 1.6.	As above.	As above.
Countryside Council for Wales	2.13 CCW notes that the screening review of potential in combination effects considered only 'plans' and not also 'projects' as required by the Habitats Directive. In addition, CCW would suggest that to rely on a plan list produced three years ago and for another type of assessment process may not be appropriate in terms of the HRA	Noted. Approach to in combination effects still to be confirmed with NE and CCW, to be discussed at November HRA meeting with consultees.	Ongoing.

Consultee	Response	Proposed Action / Justification	Outcome
	process given that many additional plans are likely to be either approved and/or in development. It is suggested that the review of plans and projects with potential 'in combination' effects is reconsidered, and at the very least that the list of those plans considered (in Appendix I of the June 2008 Screening Report) be reproduced within this document for comment.		
Countryside Council for Wales	2.18 It should be noted that the Wye SAC and Severn Estuary Suites of Sites extend considerably beyond the 15km buffer zone. Because the features of interest in these sites include migratory species, potential effects on the whole extent of these sites should be considered.	Noted. Effects on the whole extent of these sites have been considered.	Addressed in full HRA Report.
Countryside Council for Wales	2.21 CCW notes that no reference has been made to the potential for water pollution/decline in water quality, even though this issue has been raised within the SEA for these preferred options. CCW notes, with concern, the potential for 'disruption' and 'interruption' to hydrological regimes at sensitive European sites. Clarification as to what is understood by interruption and disruption would be welcomed.	Noted. LUC drew on the Water Cycle Study, but recognises that there is uncertainty in relation to water. This issue was also discussed at the SA and HRA workshop held on 4 th August 2010, and will also be discussed at November HRA meeting with consultees.	Ongoing.
Countryside Council for Wales	2.23-2.25 See comments on Appendix I to this report regarding the 'screening out' of certain policies.	Noted – specific actions noted to relevant comments below.	Addressed in full HRA Report.
Countryside Council for Wales	2.26 In the case of Bromyard and the potential effects on water quality in the River Frome identified within the SEA, CCW will rely on Natural England's response as to whether they consider these effects 'significant' in terms of 'in combination' effects on the River Wye SAC.	Noted – screening conclusion will be changed to uncertain, in order to assess in combination effects on River Wye SAC through AA.	Addressed in full HRA Report.
Countryside Council for Wales	3.2 It should be noted that the Wye SAC and Severn Estuary Suite of Sites extend considerably beyond the 15km buffer zone. Because the features of interest in these sites include migratory species, potential effects on the whole extent of these sites should be considered.	Noted. Effects on the whole extent of these sites have been considered.	Addressed in full HRA Report.
Countryside	3.4	Noted – specific actions noted to relevant	Addressed in full HRA

Consultee	Response	Proposed Action / Justification	Outcome
Council for Wales	See comments on Appendix 2. Observation objectives for all European Sites in Wales can be found on the CCW website (ccw.gov.uk).	comments below.	Report.
Countryside Council for Wales	3.6 See comments on 1.15: As well as noise and light pollution, consideration needs to be given to potential effects of vibration. Noise, light and vibration effects need to be considered, not only in the context of bird species but also mammals (including otter) and fish species (notably shad). With regard to potential effects of noise on European species associated with European Sites (bats, otter etc), CCW would suggest that an arbitrary 'buffer' of 500m from the boundary of European Sites is not likely to be appropriate in all cases.	Noted. Vibration effects have been added, as has recognition of the potential impacts on species other than birds. The wording of the paragraph has been amended to highlight the fact that the 500m buffer has been applied in line with the Environment Agency's guidance.	Addressed in full HRA Report.
Countryside Council for Wales	3.13 It should be noted that, at the time of writing, Dwr Cymru have yet to issue a revised HRA in respect of their Water Resource Management Plan. Consideration will need to be given to the outcomes of the Review of Consents process.	Noted. The outcomes of the Review of Consents process will be taken into consideration when available.	No action required at this stage.
Countryside Council for Wales	3.14 The HRA process for the Severn Trent Water Resource Management Plan is still subject to consideration. The outcomes of this HRA and the Review of Consents process for the Wye and Usk will need to be taken into account within this WRMP.	Noted.	No action required at this stage.
Countryside Council for Wales	3.15 CCW would suggest that early discussions are held with Dwr Cymru in respect of water treatment and quality issues on the Wye SAC.	Noted. A meeting between LUC and Dwr Cymru has been scheduled to take place later in November at which the emerging findings of the HRA and the issues arising will be discussed and the outcomes incorporated into the ongoing HRA work.	Ongoing.
Countryside Council for Wales	3.19 See comments above on the need to consider potential effects of vibration, as well as noise and light pollution. CCW would suggest that noise pollution also needs to be considered in the context of fish and	Noted. Vibration effects are being taken into consideration throughout the HRA, as is the potential for noise pollution to impact upon species other than bats.	Addressed in full HRA Report.

Consultee	Response	Proposed Action / Justification	Outcome
	mammal species other than bats i.e. otters. The potential effects of noise on the Wye SAC should therefore be included within this HRA process.		
Countryside Council for Wales	3.21 CCW would suggest that noise pollution also needs to be considered in the context of fish and mammal species other than bats i.e. otters. The potential effects of light pollution on the Wye SAC therefore should be considered.	Noted. The potential for noise pollution to impact upon species other than bats is being taken into consideration throughout the HRA.	Addressed in full HRA Report.
Countryside Council for Wales	3.22 CCW is disappointed to note that air pollution is only considered in respect of vehicle traffic. Consideration should be given to potential impacts from other air pollution point sources including agricultural/employment development (intensive agricultural developments) and waste treatment facilities. Consideration may also need to be given to diffuse air pollution issues.	Noted. The potential for other forms of development to result in air pollution impacts has been considered in the HRA.	Addressed in full HRA Report.
Countryside Council for Wales	3.23 CCW would suggest the last sentence of this section be re-phrased to reflect the assessment's findings that proposals for development are unlikely to result in physical loss and direct physical damage to N2K sites. Damage to habitat is not restricted to loss/physical damage alone.	Noted. The wording of this paragraph has been amended to reflect this.	Addressed in full HRA Report.
Countryside Council for Wales	3.25 See comments above on 3.2. As previously discussed, the availability of water resources may be dependent on implementation of the Review of Consents process. CCW would suggest that early discussions are held with Dwr Cymru and EA in respect of water resources on the Wye SAC and within WRZs in the Herefordshire area.	Noted. CCW, Welsh Water, NE and EA invited to a November HRA meeting to discuss these issues.	Ongoing.
Countryside Council for Wales	3.26 CCW notes the potential for the adverse effects on the Wye in terms of water quality. CCW would suggest that early discussions are held with Dwr Cymru and EA in respect of water quality on the Wye SAC and within WRZs in the Herefordshire area, particularly with respect	Noted. CCW, Welsh Water, NE and EA invited to a November HRA meeting to discuss these issues.	Ongoing.

Consultee	Response	Proposed Action / Justification	Outcome
	to the Review of Consents process.		
Countryside Council for Wales	Table 3.1 See comments on Appendix I.	See response to comments on Appendix I.	See response to comments on Appendix I.
Countryside Council for Wales	4.1 With regard to available guidance, reference should be made to CCW's HRA of plans guidance (April 2010). CCW notes the comment that this interim HRA does not include spatial options for Hereford and a number of additional policies. It is suggested however, that as and when these additional policies become available, re-screening of Preferred Options policies may be required in order to determine the likelihood of significant effects on European Sites in combination with these new policies.	Noted. Now that spatial policies are available, the HRA report (including Screening) has been updated to reflect this.	Addressed in full HRA Report.
Countryside Council for Wales	Table 4.1: Noise See comments above on 3.6. CCW notes that identified mitigation measures for noise only relate to construction. Consideration will also need to be given to noise mitigation in respect of operation of development. Ideally, this HRA and LDF policies would recommend avoidance measures before mitigation.	Noted. The need to mitigate adverse impacts from noise during operation has been included in the HRA.	Addressed in full HRA report.
Countryside Council for Wales	Light Pollution Consideration needs to be given to potential effects of light pollution on the Wye SAC. Ideally, this HRA and LDF policies would recommend avoidance measures before mitigation.	Noted. The potential effects of light pollution on the River Wye SAC have been recognised in the HRA report and appropriate mitigation measures identified.	Addressed in full HRA report.
Countryside Council for Wales	Air Pollution See comments on 3.22. Consideration needs to be given to diffuse pollution issues and to point sources including agricultural industry.	Noted. Consideration of air pollution from sources other than road traffic has now been included in the HRA.	Addressed in full HRA report.
Countryside Council for Wales	Physical Damage/Loss of Habitat CCW is concerned by the implication that consideration of physical loss/damage to European habitats (and species) will be deferred down to the project level. Reliance on lower tier plan or project appraisal is only appropriate where a later appraisal and option selection will ensure that there will be no adverse effect on site integrity. It will be appropriate to consider relying on the HRA of lower tiers, in order for a plan making authority to ascertain a higher tier plan would not	Noted. In many cases, the scale, type, location etc. of the development that may arise from the policies will not be known until the later stage and a meaningful assessment of the impacts is not possible at this stage.	Addressed in full HRA report.

Consultee	Response	Proposed Action / Justification	Outcome
	<p>have an effect on the integrity of a European Site, only where: The higher tier plan cannot reasonably assess the effects on a European Site in a meaningful way; whereas the HRA of a lower tier plan or project, which will identify the nature, scale and location of development and its potential effects, will be able to change the proposal if an adverse effect on site integrity cannot be ruled out, because the lower tier is free to change the nature, scale and/or location of the proposal in order to avoid adverse effects on the integrity of a site and where HRA of the plan/project at lower level is required by law or Government policy.</p>		
<p>Countryside Council for Wales</p>	<p>Recreation Pressure Ideally, this HRA and LDF policies would recommend avoidance measures before mitigation.</p>	<p>Noted. Where possible, the HRA has made recommendations for avoidance measures such as amendments to the wording of policies within the Core Strategy.</p>	<p>Addressed in full HRA report.</p>
<p>Countryside Council for Wales</p>	<p>Interruption to Hydrological Regimes This section appears to only consider water quality and STW issues. As previously discussed, there may be issues and the potential for significant effects relating to water resource issues (increased abstraction). These issues must be considered in the context of the Review of Consents for the Wye and also the relevant WRMPs for both Dwr Cymru and possibly Severn Trent. Ideally, this HRA and LDF policies would recommend avoidance measures before mitigation.</p>		
<p>Countryside Council for Wales</p>	<p>4.3 See comments above on 4.1</p>	<p>See response to comments above on 4.1.</p>	<p>See response to comments above on 4.1.</p>
<p>Countryside Council for Wales</p>	<p>Appendix I: Screening Matrix for Emerging Core Strategy Preferred Options Given the potential for 'in combination' effects between policies (and with other plans and projects) and in particular, the potential for in-combination effects in relation to policies involving proposed development in and affecting the River Wye SAC, it is suggested that the HRA process and production of this interim report may be a little premature and that once outstanding policies (including Herefordshire</p>	<p>Noted. The report was clearly described as an Interim HRA Report, and explanation was provided in paragraph 1.6.</p>	<p>Full HRA Report covers all Core Strategy policies.</p>

Consultee	Response	Proposed Action / Justification	Outcome
	Spatial Options) have been developed, Core Strategy Preferred Options will need to be re-screened should have 'waited' until these additional policies/strategies were produced and available for assessment.		
Countryside Council for Wales	<p>Policy E1: Maintaining Supply of Employment Land CCW notes that this policy relates to 'development on land that has already been allocated for employment'. The fact that land has already been allocated for employment does not negate the possibility that implementation of the policy might have the potential for significance effects on European Sites. CCW notes that policy caveats do not relate to any natural heritage /resource issues including water resources/quality, air quality etc. It is suggested that in order for this policy to not have the potential to impact upon European Sites, additional criteria should be developed so as to demonstrably avoid/mitigate against likely significant effects.</p>	Noted. The screening finding has been amended to 'uncertain' to acknowledge the potential for adverse impacts on European sites and is considered further at the Appropriate Assessment stage.	Addressed in full HRA Report.
Countryside Council for Wales	<p>Policy E2 Employment Land Provision See comments above on E1. CCW would suggest that 'likely activities' should include aspects of water quality and water use, air quality issues (dependent on the nature/scale of employment development) etc. CCW would also suggest that this screening exercise (and related policy caveats) should seek avoidance of likely significant effects before and as well and mitigation measures. As written, the proposed mitigation measures as a little weak and fail to demonstrate that adverse effects to European Sites would not occur. Aspirational mitigation proposals ('may help', 'may reduce') are unlikely to provide sufficient robustness to satisfy the HRA process and the requirement to demonstrate 'no likely significant effect'.</p>	Noted. Mitigation measures proposed throughout the Screening Matrix have been revisited and more specific mitigation has been detailed where possible, for example identifying other policies within the Core Strategy which may help to mitigate potential adverse impacts. The extent to which the mitigation measures identified can demonstrate 'no significant effect', or would be able to with revised wording, is considered further at the Appropriate Assessment stage.	Addressed in full HRA Report.
Countryside Council for Wales	<p>GT.1: Gypsy and Traveller Sites See comments above regarding the desirability of seeking avoidance measures before mitigation and on the need for more robust mitigation measures than are currently proposed.</p>	Noted. Mitigation measures proposed throughout the Screening Matrix have been revisited and more specific mitigation has been detailed where possible, for example identifying other policies within the Core Strategy which may help to mitigate potential adverse impacts.	Addressed in full HRA Report.

Consultee	Response	Proposed Action / Justification	Outcome
		The extent to which the mitigation measures identified can demonstrate 'no significant effect', or would be able to with revised wording, is considered further at the Appropriate Assessment stage.	
Countryside Council for Wales	<p>Policies NHI-4 Natural and Built Heritage Assets CCW has made a number of comments on this suite of policies within our response to the SEA. As written, the proposed mitigation measures are a little weak and fail to demonstrate that adverse effects to European Sites would not occur. Aspirational mitigation proposals ('may help', 'may reduce') are unlikely to provide sufficient robustness to satisfy the HRA process and the requirement to demonstrate 'no likely significant effect'.</p>	Noted. Mitigation measures proposed throughout the Screening Matrix have been revisited and more specific mitigation has been detailed where possible, for example identifying other policies within the Core Strategy which may help to mitigate potential adverse impacts. The extent to which the mitigation measures identified can demonstrate 'no significant effect', or would be able to with revised wording, is considered further at the Appropriate Assessment stage.	Addressed in full HRA Report.
Countryside Council for Wales	<p>GI.1 Green Infrastructure See comments above on NHI-4.</p>	Noted. Mitigation measures proposed throughout the Screening Matrix have been revisited and more specific mitigation has been detailed where possible, for example identifying other policies within the Core Strategy which may help to mitigate potential adverse impacts. The extent to which the mitigation measures identified can demonstrate 'no significant effect', or would be able to with revised wording, is considered further at the Appropriate Assessment stage.	Addressed in full HRA Report.
Countryside Council for Wales	<p>Movement: CCW would suggest that 'likely activities' should include noise, water quality, light pollution, severance of habitats, barriers to species movement etc. CCW would also suggest that this screening exercise (and related policy caveats) should seek avoidance of likely significant effects before and as well as mitigation measures. As written, the</p>	<p>Noted. The likely impacts of the policy on European sites have been reviewed.</p> <p>Mitigation measures proposed throughout the Screening Matrix have been revisited and more specific mitigation has been detailed where</p>	Addressed in full HRA Report.

Consultee	Response	Proposed Action / Justification	Outcome
	proposed mitigation measures are weak and fail to demonstrate that adverse effects to European Sites would not occur.	possible, for example identifying other policies within the Core Strategy which may help to mitigate potential adverse impacts. The extent to which the mitigation measures identified can demonstrate 'no significant effect', or would be able to with revised wording, is considered further at the Appropriate Assessment stage.	
Countryside Council for Wales	OS.1-OS.3 Open Space, Sport and Recreation CCW would also suggest that this screening exercise (and related policy caveats) should seek avoidance of likely significant effects before and as well as mitigation measures. As written, the proposed mitigation measures are weak and fail to convince that adverse effects to European Sites would not occur.	Noted. Mitigation measures proposed throughout the Screening Matrix have been revisited and more specific mitigation has been detailed where possible, for example identifying other policies within the Core Strategy which may help to mitigate potential adverse impacts. The extent to which the mitigation measures identified can demonstrate 'no significant effect', or would be able to with revised wording, is considered further at the Appropriate Assessment stage.	Addressed in full HRA Report.
Countryside Council for Wales	Waste Streams and Targets See comments above on E.2.	Noted. Mitigation measures proposed throughout the Screening Matrix have been revisited and more specific mitigation has been detailed where possible, for example identifying other policies within the Core Strategy which may help to mitigate potential adverse impacts. The extent to which the mitigation measures identified can demonstrate 'no significant effect', or would be able to with revised wording, is considered further at the Appropriate Assessment stage.	Addressed in full HRA Report.
Countryside Council for Wales	RA1: Rural Areas CCW would suggest that 'likely activities' should include aspects of water quality and water use, air quality issues etc. CCW would also suggest that this screening exercise (and related policy caveats) should	Noted. Mitigation measures proposed throughout the Screening Matrix have been revisited and more specific mitigation has been detailed where possible, for example identifying	Addressed in full HRA Report.

Consultee	Response	Proposed Action / Justification	Outcome
	seek avoidance of likely significant effects before mitigation measures.	other policies within the Core Strategy which may help to mitigate potential adverse impacts. The extent to which the mitigation measures identified can demonstrate 'no significant effect', or would be able to with revised wording, is considered further at the Appropriate Assessment stage.	
Countryside Council for Wales	RA2: Rural Service Centres CCW would suggest the potential for likely significant effects is not necessarily dependent on whether development takes place within existing settlement boundaries but the nature, magnitude and location etc of that development (and settlement) in relation to European Sites.	Noted. The fact that development in rural areas is proposed, and its nature, magnitude etc. is considered under other Rural Areas policies (e.g. RA1). This policy relates only to the location of that development, and so is considered accordingly.	No change to HRA Report.
Countryside Council for Wales	RA3: Other Settlements See comments above. Avoidance measures should be adopted as well as mitigation measures. Mitigation measures should be sufficiently robust so as to satisfy the HRA process and the requirement to demonstrate 'no likely significant effect'.	Noted. Mitigation measures proposed throughout the Screening Matrix have been revisited and more specific mitigation has been detailed where possible, for example identifying other policies within the Core Strategy which may help to mitigate potential adverse impacts. The extent to which the mitigation measures identified can demonstrate 'no significant effect', or would be able to with revised wording, is considered further at the Appropriate Assessment stage.	Addressed in full HRA Report.
Countryside Council for Wales	RA5: Rural Employment CCW would suggest that 'likely activities' should include aspects of water quality and water use, air quality issues (dependent on the nature/scale of employment development) etc. CCW would also suggest that this screening exercise (and related policy caveats) should seek avoidance of likely significant effects before and as well as mitigation measures. As written, the proposed mitigation measures are weak and fail to convince that adverse effects to European Sites would not occur. Aspirational mitigation proposals ('may help', 'may	Noted. The potential impact of population growth (including tourist population) on water quality and quantity has been noted in the Screening matrix. Mitigation measures proposed throughout the Screening Matrix have been revisited and more specific mitigation has been detailed where possible, for example identifying other policies	Addressed in full HRA Report.

Consultee	Response	Proposed Action / Justification	Outcome
	reduce') are unlikely to provide sufficient robustness to satisfy the HRA process and the requirement to demonstrate 'no likely significant effect'.	within the Core Strategy which may help to mitigate potential adverse impacts. The extent to which the mitigation measures identified can demonstrate 'no significant effect', or would be able to with revised wording, is considered further at the Appropriate Assessment stage.	
Countryside Council for Wales	<p>Spatial Policy Options for Ross on Wye In our response to the SEA for the Herefordshire preferred options, CCW has raised a number of concerns relating to the potential for Ross on Wye's spatial options to have significance adverse effects on the Wye SAC. Our main concerns relate to resource and water quality impacts (as well as noise, disturbance, barriers to movement of features of interest etc). CCW notes that these concerns are reflected within this screening document and expects that the Ross on Wye options will need to be taken to the next stage of the HRA process i.e. appropriate assessment, notably in the context of potential 'in combination' effects.</p>	Noted. The likely effects of development in and around Ross on Wye are considered further at the Appropriate Assessment stage, including the likely cumulative effects.	Addressed in full HRA Report.
Countryside Council for Wales	<p>Appendix 2 – Appropriate Assessment Findings for Emerging Core Strategy Preferred Options See comments above regarding HRA screening uncertainties. CCW has suggested that a number of issues have not been fully considered within this HRA's screening stage including water resources issues, potential effects on mobile species including otter etc. In addition, given that a number of policies – including those for Hereford itself, have not yet been considered as part of this HRA process. Given the potential for 'in combination' effects between policies (and with other plans and projects) and in particular, the potential for in combination effects in relation to policies involving proposed development in and affecting the River Wye SAC, it is suggested that the HRA process and production of this interim report may be a little premature and that once outstanding policies (including Hereford Spatial Options) have been developed, Core Strategy Preferred Options will need to be re-</p>	Noted. The report was clearly described as an Interim HRA Report, and explanation was provided in paragraph 1.6.	Full HRA Report covers all Core Strategy policies.

Consultee	Response	Proposed Action / Justification	Outcome
	screened should have 'waited' until these additional policies/strategies were produced and available for assessment.		
Countryside Council for Wales	<p>Coed y Cerrig SAC CCW notes with some concern the reference to potential physical loss/damage to this site. Given the high level of protection for this site, it would be expected that Herefordshire's LDF policies would seek to ensure that physical loss and/or damage are avoided and that potential non physical adverse affects are similarly avoided and/or mitigated for. CCW would suggest, as written, the protection of Natural and Historic Assets policies are not sufficiently robust so as to protect, maintain and enhance European Sites. CCW also notes the premise that 'analysis' will take place at the planning application stage. Reliance on lower tier plan or project appraisal is only appropriate where a later appraisal and option selection will ensure that there will be no adverse affect on site integrity. . It will be appropriate to consider relying on the HRA of lower tiers, in order for a plan making authority to ascertain a higher tier plan would not have an effect on the integrity of a European Site, only where:</p> <p>The higher tier plan cannot reasonably assess the effects on a European Site in a meaningful way; whereas the HRA of a lower tier plan or project, which will identify the nature, scale and location of development and its potential effects, will be able to change the proposal if an adverse effect on site integrity cannot be ruled out, because the lower tier is free to change the nature, scale and/or location of the proposal in order to avoid adverse effects on the integrity of a site and where HRA of the plan/project at lower level is required by law or Government policy.</p>	Noted. Physical damage/loss of habitat at Coed Y Cerrig SAC has now been ruled out due to the distance of the site from the county boundary.	Addressed in full HRA report.
Countryside Council for Wales	<p>Cwm Clydach Woodlands SAC See comments above on Coed y Cerrig SAC.</p>	Noted. Physical damage/loss of habitat at Cwm Clydach Woodlands SAC has now been ruled out due to the distance of the site from the county boundary.	Addressed in full HRA report.
Countryside Council for Wales	<p>Llangorse Lake SAC CCW notes with interest that this assessment includes consideration</p>	Noted. Physical damage/loss of habitat at Llangorse Lake SAC has now been ruled out	Addressed in full HRA report.

Consultee	Response	Proposed Action / Justification	Outcome
	<p>of 'physical loss of habitat resulting from development'. It should be noted that the Llangorse Lake SAC is located outwith the Herefordshire LDF area and that consideration of physical development (construction, construction noise etc) directly affecting this European Site is not likely to be relevant to this particular HRA process. CCW notes and agrees however, that Llangorse Lake SAC has the potential to be adversely affected through increases in air pollution and recreational purposes.</p>	<p>due to the distance of the site from the county boundary.</p>	
<p>Countryside Council for Wales</p>	<p>Rhos Goch SAC See comments above on Llangorse Lake SAC.</p>	<p>Noted. Physical damage/loss of habitat at Rhos Goch SAC has now been ruled out due to the distance of the site from the county boundary.</p>	<p>Addressed in full HRA report.</p>
<p>Countryside Council for Wales</p>	<p>River Usk SAC CCW notes with interest that this assessment includes consideration of 'physical loss of habitat resulting from development'. It should be noted that the Usk SAC is located outwith the Herefordshire LDF area and that consideration of DIRECT physical development (construction, construction noise etc) directly affecting this European Site is not likely to be relevant to this particular HRA process. CCW would, however, disagree with the premise that noise, air and light pollution are 'not considered likely to have an adverse effect on the qualifying features of this site'. A number of the Usk's features of interest are particularly sensitive and vulnerable to noise, light and air pollution. CCW does, however, note the potential for adverse effects resulting from indirect, hydrological effects and recreational pressure and notes with particular concern that 'demand for water abstraction may have a significant adverse effect on site integrity'. As previously discussed, the conjunctive use of the Wye SAC and Usk SAC with regard to water supply is extremely complex and is subject to the developing Dwr Cymru WRMP and the Review of Consents process. CCW could not condone the promotion of policies that had the potential to affect the integrity of the Usk SAC and would strongly recommend that Herefordshire County Council engage in early discussions with Dwr Cymru on this matter.</p>	<p>Noted. Physical damage/loss of habitat at the River Usk SAC has now been ruled out due to the distance of the site from the county boundary. The potential for noise, light and air pollution to affect the site has been acknowledged, but again the distance from any potential development sites has enabled such impacts to be ruled out.</p> <p>CCW, Welsh Water, NE and EA invited to a November HRA meeting to discuss these issues.</p>	<p>Addressed in full HRA report.</p> <p>Ongoing</p>

Consultee	Response	Proposed Action / Justification	Outcome
<p>Countryside Council for Wales</p>	<p>River Wye SAC CCW would disagree with the premise that noise, air and light pollution are 'not considered to have an adverse effect on the qualifying features of this site'. A number of Wye's features of interest (allis and twaite shad, otter etc) are particularly sensitive and vulnerable to noise, light and air pollution and disturbance in general. With regard to the uncertainty regarding the likelihood of physical loss of habitat, it would be expected that Herefordshire's LDF policies would seek to ensure as far as possible, that physical loss and/or damage are avoided and that and that potential non physical adverse effects are also similarly avoided and/or mitigated for. CCW would suggest that, as written, the 'protection of Natural and Historic Assets policies are not sufficiently robust so as to protect, maintain and enhance European Sites. CCW also notes the premise that 'analysis' will take place at the planning application stage. Reliance on lower tier plan or project appraisal is only appropriate where a later appraisal and option selection will ensure that there will be no adverse effect on site integrity. It will be appropriate to consider relying on the HRA of lower tiers, in order for a plan making authority to ascertain a higher tier plan would not have an effect on the integrity of a European Site, only where the higher tier plan cannot reasonably assess the effects on a European Site in a meaningful way;</p> <ul style="list-style-type: none"> • The HRA of a lower tier plan or project, which will identify the nature, scale and location of a development and its potential effects, will be able to change the proposal if an adverse effect on site integrity cannot be ruled out, because the lower tier is free to change the nature, scale and/or location of the proposal in order to avoid adverse effects on the integrity of a site; and • Where HRA of the plan/project at lower level is required by law or Government policy. <p>With regard to identified potential damage to hydrological regimes (water quality and water abstraction), CCW notes and agrees with</p>	<p>Noted. The HRA recognises the potential for species at the River Wye to be adversely affected by noise, air and light pollution. CCW, Welsh Water, NE and EA invited to a November HRA meeting to discuss the water related issues.</p>	<p>Ongoing</p>

Consultee	Response	Proposed Action / Justification	Outcome
	<p>this assessment's suggestion that housing allocations at Ross and Hereford should be reviewed in the context of potential water pollution. In addition to these two allocations, consideration must also be given to all potential 'in combination' effects on water quality from other plans and projects (e.g. Powys LDP, Monmouth LDP etc) and allocations etc located on tributaries of the Wye (e.g. the Lugg). It should be noted that, since some of the features of the Wye SAC are migratory, water quality issues will affect both upstream and downstream of pollution sources. Consideration also needs to be given to water quality issues in respect of employment and rural policies. See comments on RA5 above. Certain 'agricultural' developments have the potential for significant adverse effects on the Wye SAC in terms of air and water quality and water abstraction. CCW would welcome the opportunity to discuss these types of developments (poultry and pig units etc) with Herefordshire County at the earliest possible opportunity. CCW notes and welcomes the reference to the Review of Consents process and the need for early discussions with Dwr Cymru.</p> <p>As regards issues relating to water quantity, CCW notes and welcomes the acknowledgement that no new abstraction licenses are likely to be granted. With regard to potential efficiency measures, CCW would suggest that while such measures are to be welcomed, they must also apply to the non-domestic sector. Certain 'agricultural' developments have the potential for significant adverse effects on the Wye SAC in terms of air and water quality and water abstraction. CCW would welcome the opportunity to discuss these types of developments (poultry and pig units etc) with Herefordshire Council at the earliest possible opportunity. CCW notes and welcomes the reference to the Review of Consents process and the need for early discussions with Dwr Cymru.</p>		
Countryside Council for Wales	<p>Severn Estuary SAC and SPA and Ramsar CCW notes with interest that this assessment includes consideration of 'physical loss of habitat resulting from development'. It should be</p>	Noted. Physical damage/loss of habitat at the Severn Estuary has now been ruled out due to the distance of the site from the county	Addressed in full HRA report.

Consultee	Response	Proposed Action / Justification	Outcome
	<p>noted that the Severn Estuary SAC is located outwith the Herefordshire LDF area and that consideration of DIRECT physical development directly affecting this European Site is not likely to be relevant to this particular HRA process. See comments above on deferring 'analysis' of effects down to the project level. And the 'robustness' of Protection of Natural and Historic Assets policies. CCW would question whether 'trampling' of the Severn Estuary SAC is likely to be an issue.</p> <p>See comments above on the Wye SAC in respect of water quality and water abstraction issues and other issues relating to migratory fish. Consideration should be given, in the context of the Severn Estuary SAC to 'in combination' effects of the Herefordshire LDF with other plans and projects.</p>	<p>boundary.</p>	
<p>Countryside Council for Wales</p>	<p>Sugar Loaf Woodlands SAC See comments above on Cwm Clydach Woodlands SAC.</p>	<p>Noted. Physical damage/loss of habitat at the Sugar Loaf Woodlands SAC has now been ruled out due to the distance of the site from the county boundary.</p>	<p>Addressed in full HRA report.</p>
<p>Countryside Council for Wales</p>	<p>Usk Bats Sites SAC This assessment fails to include the Lesser Horseshoe Bat as a feature of interest of this site. With regard to the uncertainty regarding the likelihood of physical loss of habitat, it would be expected that Herefordshire's LDF policies would seek to ensure as far as possible, that physical loss and/or damage are avoided and that and that potential non physical adverse effects are also similarly avoided and/or mitigated for. CCW would suggest that, as written, the 'protection of Natural and Historic Assets policies are not sufficiently robust so as to protect, maintain and enhance European Sites. CCW also notes the premise that 'analysis' will take place at the planning application stage. Reliance on lower tier plan or project appraisal is only appropriate where a later appraisal and option selection will ensure that there will be no adverse effect on site integrity. It will be appropriate to consider relying on the HRA of lower tiers, in order for a plan making authority to ascertain a</p>	<p>Noted. Amendments to the wording of policy NH.2 have been suggested as part of the avoidance measures recommended within the HRA. Physical damage/loss of habitat at the Usk Bat Sites SAC has now been ruled out due to the distance of the site from the county boundary.</p>	<p>Addressed in full HRA report.</p>

Consultee	Response	Proposed Action / Justification	Outcome
	<p>higher tier plan would not have an effect on the integrity of a European Site, only where the higher tier plan cannot reasonably assess the effects on a European Site in a meaningful way;</p> <ul style="list-style-type: none"> • The HRA of a lower tier plan or project, which will identify the nature, scale and location of a development and its potential effects, will be able to change the proposal if an adverse effect on site integrity cannot be ruled out, because the lower tier is free to change the nature, scale and/or location of the proposal in order to avoid adverse effects on the integrity of a site; and • Where HRA of the plan/project at lower level is required by law or Government policy. <p>CCW notes and agrees with this assessment's findings in respect of noise and light pollution but would suggest that, given the mobile nature of the Lesser Horseshoe Bat, additional consideration needs to be given to potential effects of all activities (including physical loss/damage) to all relevant habitats including foraging, breeding, hibernating and roosting areas and flightlines.</p> <p>See comments above on mitigation measures. CCW would suggest that the preferred option would be for plan policies to avoid the potential for adverse effects before seeking mitigation.</p> <p>See comments on the River Wye SAC in respect of issues relating to water quality and quantity.</p>		
<p>Countryside Council for Wales</p>	<p>Wye Valley and Forest of Dean Bat Sites SAC See comments above on the Usk Bat Sites SAC.</p>	<p>Physical damage/loss of habitat at the Sugar Loaf Woodlands SAC has now been ruled out due to the distance of the site from the county boundary.</p>	<p>Addressed in full HRA report.</p>
<p>Countryside Council for Wales</p>	<p>Wye Valley Woodlands SAC See comments above on the Usk Valley Bat Sites SAC and Wye Valley and Forest of Dean Bat Sites SAC.</p>	<p>Noted. Comments on other bats sites have been taken into consideration in relation to this site also.</p>	<p>Addressed in full HRA report.</p>

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Appendix 4
Review of neighbouring development plans

Appendix 4

**Review of neighbouring plans and list of projects that could
have in-combination effects**

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LOCAL PLANS AND STRATEGIES

Forest of Dean Core Strategy: Pre-Publication Draft, September 2010

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 as follows:

- Cinderford – 1, 050 new homes (20% of District total)
- Lydney – 1,900 new homes (37% of District total)
- Coleford – 650 new homes (13% of District total)
- Newent - 350 new homes (7% of District total)
- Villages – 1,212 (26% of District total)

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

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

HRA Findings:

No HRA Report is available on the Forest of Dean website. We contacted the planning policy team to find out if one has been prepared (10.11.10), and were advised that an element of HRA was included within the SA work in 2006. A more recent HRA report has been prepared and sent to Natural England for a consultation response, which is due back week commencing 15th November 2010. **The HRA work for the Forest of Dean Core Strategy document will need to be taken into consideration when available, in order to assess the potential for in-combination effects with the Herefordshire Core Strategy.**

South Worcestershire Joint Core Strategy – Preferred Options, September 2008

Malvern Hills District lies to the east of Herefordshire. The Core Strategy has been prepared jointly with the two other South Worcestershire authorities, Worcester City and Wychavon. The latest consultation (on the Preferred Options version) took place in September 2008; however the Core Strategy is now being brought together with the Site Allocations and Policies DPD to form one document – the South Worcestershire Development Plan, which is due to be adopted in 2013. A further Preferred Options consultation on the newly merged document is due to take place in 2011.

Housing: The Joint Core Strategy sets out the housing provision which is needed to comply with the South West RSS allocations, although it is not known whether these allocations will still be given consideration now that the RSS has been abolished. Based on these figures, as well as other evidence, the following allocations for housing are set out (having taken into consideration both windfall allowances and completions up to the end of May 2007) for the Malvern Hills:

- Malvern – 1,600 homes
- Tenbury Wells – 100 homes
- Upton-Upon-Severn – 100 homes
- Category 1 and 2 villages – 500 (those with the best range of services and

facilities and access to public transport).

Employment: The Core Strategy sets out the employment land provision which is needed to comply with the South West RSS allocations, although it is not known whether these allocations will still be given consideration now that the RSS has been abolished. Based on these figures, as well as other evidence, the following allocations for employment land provision are set out (having taken into consideration completions up to the end of May 2007) for the Malvern Hills:

- Malvern – 17 ha

No allocations are made for provision elsewhere in the Malvern Hills.

HRA Findings: No HRA work has yet been undertaken.

Now that the Joint Core Strategy is being merged with the Site Allocations and Policies DPD and a new Preferred Options consultation is being prepared in 2011, the HRA work for this new combined document will need to be taken into consideration when available, in order to assess the potential for in-combination effects with the Herefordshire Core Strategy.

Shropshire Core Strategy – Final Plan Publication, February 2010

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, with up to 25% of these being focussed in Shrewsbury, 40% in market towns and other key centres and the remaining 35% in rural areas. In South Shropshire, which borders Herefordshire, 4,125 new dwellings will be provided.

Employment: The Core Strategy states that up to 290 hectares of employment land will be provided in Shropshire up to 2026. Shrewsbury will receive 90 hectares, whilst South Shropshire, which borders Herefordshire, will receive 35-45 hectares of new employment land.

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 at the next tier of the Core Strategy, 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. However, this is still at issues and options stage and so AA findings are not yet available.

Given this conclusion, it is not yet possible to rule out the potential for the Shropshire Core Strategy to result in in-combination effects with the Herefordshire Core Strategy as the locations for development have not yet been specified. Consideration will need to be given to the Appropriate Assessment findings for the Site Allocations and Management of Development DPD once they are available.

Monmouthshire Local Development Plan: Preferred Strategy, May 2009

Monmouthshire lies to the south west of Herefordshire.

Housing: The LDP sets out that the majority of development will be directed within or adjoining the main settlements of Abergavenny, Caldicot, Chepstow, Monmouth and Magor. Strategic housing sites will be provided at each of these locations. Four hundred dwellings per year will be provided over the LDP period 2011-2021, with a total housing provision of 5,250 dwellings. This is to be distributed as follows:

- Abergavenny - 1,073 (16.8%)
- Caldicot – 701 (12.3%)
- Chepstow – 750 (13.6%)
- Monmouth – 821 (12.2%)
- Magor – 383 (6.2%)
- Usk – 161 (3.1%)
- Raglan – 74 (1.4%)
- Penperlleni – 77 (1.3%)
- Rogiet – 97 (2.1%)
- Rural areas – 1,105 (31.1%)

Employment: The LDP does not specify the area of employment land to be provided within Monmouthshire; however it states that strategic employment sites will be provided at:

- Magor Business Park
- Quaypoint, Magor
- Gwent Europark, Magor
- Grove Farm, Llanfoist
- Wonastow Road, Monmouth
- Lower Chepstow (Farifield Mabey/Osborne)
- Former Sudbrook Paper Mill

HRA Findings: The latest HRA work that has been published in relation to the LDP is the May 2009 Screening Assessment. This report identified the potential for the LDP to have a negative impact on a number of European sites, which is to be considered further at the Appropriate Assessment stage. This included the following potential impacts:

- Coed Y Cerrig SAC: water quantity and air quality.
- Cym Cladach SAC: water quantity and air quality.
- River Wye SAC: recreation pressure, water quality and quantity and air quality.
- Sugar Loaf Woodlands SAC: recreation pressure, water quantity and air quality.
- Usk Bat Sites SAC: air quality, water quantity, noise and light pollution.
- Wye Valley and Forest of Dean Bat Sites SAC: recreation pressure, noise and light pollution, air quality and water quantity.

- Wye Valley Woodlands SAC: recreation pressure, air quality and water quantity.
- Severn Estuary SAC, SPA and Ramsar Site: Water quality and quantity

In addition, in relation to all of the sites within the county boundary, the need to avoid physical loss or damage is recognised.

These screening conclusions identify likely significant effects for a number of European sites that were also identified with likely significant effects from the Herefordshire Core Strategy, and for which adverse effects on integrity have not yet been able to be ruled out. Therefore, it is not yet possible to rule out the potential for the Monmouthshire Core Strategy to result in in-combination effects with the Herefordshire Core Strategy. Consideration will need to be given to the Appropriate Assessment findings for the Monmouthshire Core Strategy once they are available.

Powys

Powys lies to the west of Herefordshire. The Council consulted on the Draft Delivery Agreement for the Local Development Plan in July/August 2010 and the preparation of the document is due to commence in January 2011. As such, no HRA work has yet been carried out.

Given that preparation of the Powys LDP has not yet begun, it is not possible to assess the likelihood of there being in-combination adverse effects on any European sites as a result of the Herefordshire Core Strategy.

List of major projects in Herefordshire for which planning applications have or will be submitted, or permission granted (provided by Herefordshire Council 8/11/10)

Application reference	Site location	Description of development	Key date
DMSW/100855/F	Land at and near Windmill Hill, Harewood End, Hereford, HR2	Erection of 55 hectares of polytunnels	Application approved 01/09/2010
DCCE0009/1595/F	Land between the Yazor Brook adjacent to Credenhill Community Centre and the north bank of the River Wye	Construction of a flood relief culvert from the Yazor Brook at Credenhill to the River Wye including an offtake weir and an energy dissipation chamber and outfall to the River Wye	Application approved 11/11/2009
DCCE2008/2973/CD	Rotherwas Industrial Estate, Rotherwas, Hereford, HR2 6UJ	Demolition of existing ammunitions bunkers and change of use of land for mixed B1, B2, B8 employment use comprising phases 1 and 2 of Rotherwas Futures along with construction of highway and drainage infrastructure for Phase 2.	Decision pending, expected before Christmas
n/a	Former Cattlemarket Site	Major mixed use development being undertaken by Hereford Futures	Application expected to be submitted before Christmas
DMS/102152/CD	Heineken UK Ltd, Plough Lane, Hereford, HR4 0LE	Planning application for Plough Lane car park, access road and bridge across Widemarsh Brook	Application submitted 25/08/2010
DMN/102045/F DMN/102046/F DMN/102047/F DMN/102048/F	Land at Oakchurch Farm, Staunton-on-Wye, Hereford, HR4 7NE	Continue to erect, take down and re erect poly tunnels rotated around fields as required	Application submitted 28/10/2010
DCCW0009/1678/RM DCCW2006/2619/O	Land to the north of Roman Road, Holmer, Hereford, Herefordshire	Residential development of 300 dwellings including access from Roman Road, essential infrastructure, open space balancing pond, landscaping, roads, parking, footpaths, cycleway and engineering earth works	RM application approved 29/10/2010