

**HEREFORDSHIRE CORE STRATEGY
REVISED PREFERRED OPTIONS
Habitats Regulations Assessment Note**

**Prepared for Herefordshire Council
by
Land Use Consultants**

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43 Chalton Street
London NW1 1JD
Tel: 020 7383 5784
Fax: 020 7383 4798
london@landuse.co.uk

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

37 Otago Street
Glasgow G12 8JJ
Tel: 0141 334 9595
Fax: 0141 334 7789
glasgow@landuse.co.uk

28 Stafford Street
Edinburgh EH3 7BD
Tel: 0131 202 1616
edinburgh@landuse.co.uk

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1 Introduction

1. Herefordshire Council is producing a Core Strategy, in order to set out the vision, spatial strategy and core policies for the spatial development of the county. The Core Strategy will form part of the Local Development Framework (LDF) along with a number of other documents including the Hereford Area Plan (HAP).
2. Land Use Consultants (LUC) was appointed by Herefordshire Council in 2010 to undertake Habitats Regulations Assessment (HRA) of both the Herefordshire Core Strategy and the Hereford Area Plan DPDs. The HRA of the Hereford Area Plan will be carried out and reported on separately as that DPD is prepared.
3. Herefordshire Council began the HRA process in relation to the Core Strategy by producing the following documents:
 - Developing Options Paper Habitats Regulations Assessment Screening Report (June 2008)
 - Developing Options Paper Habitats Regulations Assessment Screening Report Addendum (April 2009)
 - Joint SA and HRA Report for the Place Shaping Paper (January 2010)

HRA work already undertaken in relation to the 2010 Core Strategy Preferred Options

4. Following on from the Place Shaping Paper, a partial set of preferred options for the Core Strategy was produced by Herefordshire Council in June-July 2010, in relation to the policies for:
 - Affordable housing
 - Employment
 - Gypsy and traveller sites
 - Natural and Built Heritage Assets
 - Minerals
 - Waste
 - Movement
 - Open space, sport and recreation
 - Social and community infrastructure
 - Rural areas
 - The market towns of Ledbury, Bromyard and Ross-on-Wye

5. At this stage, preferred options for Hereford were still to be produced. The initial preferred options (listed above) were subject to HRA by LUC, as reported on in the interim HRA Report for the Preferred Options (August 2010). This interim HRA report is available to download from Herefordshire Council's website¹.
6. The interim HRA report was then circulated by Herefordshire Council to Natural England (NE) and Countryside Council for Wales (CCW), as a targeted consultation exercise. Although both organisations were advised that the HRA report had yet to be completed as further preferred options for Hereford were still to be produced and subject to the HRA, CCW submitted detailed comments and recommendations regarding the HRA process and the emerging conclusions.
7. Herefordshire Council then produced the preferred options for Hereford, and the HRA report was updated to include these in the assessment. In addition, CCW's comments and recommendations were taken into account. The full HRA report was completed in draft in November 2010 as a working document with uncertainties highlighted for discussion with NE and CCW at a meeting held on 16th November 2010. The full draft HRA report (November 2010) was circulated to NE and CCW for comment in advance of the meeting. As discussions were ongoing with NE and CCW regarding the impacts of the Core Strategy, the draft HRA report was not published as part of the preferred options consultation which took place in stages during summer-autumn 2010. The full draft HRA report is available on Herefordshire Council's website, the contents of which, alongside the comments received from NE and CCW, have shaped the policy content of the revised Core Strategy preferred options. A final complete HRA will be produced with the pre-submission version of the Core Strategy which will address the issues raised thus far.
8. The outcomes of the 2010 Core Strategy preferred options consultation indicated that there was considerable opposition to the scale of housing development proposed in Herefordshire. As a result of this, as well as various other factors (described below), the Council has now revised certain aspects of the preferred options for the Core Strategy and the HRA conclusions to date needed to be revisited to reflect the revised preferred options. This note reports on the findings of this HRA review.
9. It should be noted that where reference is made to the HRA conclusions for the 2010 preferred options, this relates to the conclusions of the full draft HRA report (November 2010) and not the interim HRA report (August 2010). However, the detailed methodology and background information (e.g. the description of the qualifying features of relevant European sites) set out in the interim HRA report remains valid and has been referred to in support of this note.

¹ <http://www.herefordshire.gov.uk/housing/planning/34823.asp>

Revisions to the Core Strategy Preferred Options 2011

10. The reasons for revising the preferred options are described in full in Herefordshire Council's *Herefordshire LDF Core Strategy Revised Preferred Options Background Paper* (September 2011) and include:
- The impact of the recession and the downturn in the housing market.
 - Publication of the latest Government Household Projections, which indicate a smaller increase in the number of household likely to exist in the county in the future than previous projections.
 - The requirement for the Core Strategy to set out proposals for housing delivery over a 15 year period – as a result of delays in advancing the Core Strategy this would no longer be possible without extending or re-basing the plan period.
 - Consultation responses received in 2010 in relation to the emerging preferred options, which showed significant opposition to the scale of new housing development proposed.
11. The changes that have been made to the Core Strategy preferred options as a result of these factors are summarised below:
- The plan will cover the period 2011-2031 instead of 2006-2026.
 - The housing target for the county as a whole over the plan period has been reduced from 18,000 to 16,500.
 - The housing allocation for Hereford has been reduced by 2,000 dwellings, mainly through reductions in the housing allocations for Holmer West and the removal of the Whitecross urban extension.
 - The retail floorspace requirement for Hereford has been increased from 40,000sqm to 46,000sqm.
 - The employment site allocation at Holmer East has been removed.
 - The proposed new 420 place primary school at Three Elms will now be provided instead of schools at Whitecross and Holmer West.
 - The preferred option for the Hereford relief road remains broadly as set out in the 2010 preferred option, for a western route. However, minor amendments have been made to the route (between the A465 Abergavenny and A49 Ross roads) to avoid residential properties and lessen landscape impacts.
 - The housing distribution in the rural areas has increased by 800.
 - The allocations for the market towns have been retained as similar to the 2010 preferred options, although the housing requirement for Ross-on-Wye has decreased slightly, from 1,000 to 900 new homes over the plan period, and the housing allocation for Leominster has been reduced by

200. There is also a new allocation for 5ha of employment land at Leominster's urban extension.

12. The revised preferred options have not been set out as detailed policies as the 2010 preferred options were, but are instead summarised as broad changes to the 2010 preferred options in the consultation leaflet '*Help Plan the Future of Herefordshire*' (September 2011).
13. The preferred options from 2010 that are affected by the revisions described above, and for which the HRA conclusions therefore needed to be reviewed, are:
 - Rural Areas - **Policy RAI** (the revised preferred option increases the housing numbers in rural areas and market towns by 800).
 - Rural Areas - **Policy RA5** (the revised preferred option creates more local jobs).
 - Market Towns - **Ross-on-Wye policy** (the revised preferred option reduces the total number of homes to be provided over the plan period from 1,000 to 900 and the number in the Hildesley urban extension from 350 to 200).
 - Hereford - **Policy H1: City Centre** (the revised preferred option increases the amount of retail floorspace from 40,000sqm to 46,000sqm).
 - Hereford – **Policy H2: Movement** (the route for the relief road has been slightly amended).
 - Hereford - **Policy H3: Growth Distribution** (the revised preferred option reduces the overall amount of new homes to be built in Hereford by 2,000, mainly as a result of reduced housing allocations at Holmer West and removal of the Whitecross site. It also removes the employment site at Holmer East).
 - Hereford - **Policy H4: Northern Urban Expansions** (the revised preferred option reduces the number of homes at Holmer West and removes the employment site at Holmer East. The allocation for a new primary school at Holmer West has also been removed with improvements to existing facilities instead).
 - Hereford - **Policy H5: Western Urban Expansions** (the revised preferred option removes the strategic site at Whitecross and the primary school previously planned at Whitecross will now be built at Three Elms instead).
14. The revisions that have been made to the preferred options also include changes to the proposal for Leominster (as described above, the housing allocation for the town has been reduced by 200 and a new allocation has been made for 5ha of employment land at the urban extension). However, the preferred option for Leominster was decided on at the Place Shaping Paper stage, and was not reproduced as a policy at the 2010 preferred options stage. As such, in the case of Leominster, the November 2010 HRA

report took account of the preferred option set out in the earlier Place Shaping Paper. It is the HRA findings for that preferred option, therefore, which have been updated here on the basis of the revisions described above.

2 Methodology

15. The HRA process involved considering whether any of the proposals in the Herefordshire Core Strategy preferred options are likely to affect the integrity of any European site(s) in and around Herefordshire. The full detailed methodology for the HRA, including the assumptions used for making judgements about the likelihood of particular effects occurring, is described in the August 2010 interim HRA report. This section outlines the approach that has been taken to the review of the 2010 HRA findings, in light of the revisions that have now been made to the preferred options.
16. As described above, the HRA was undertaken in August 2010 for some of the preferred options, and was updated in November 2010 to also include the preferred options for Hereford. The HRA conclusions from the complete November 2010 HRA report have now been revisited, and an assessment made regarding whether or not the revisions that have been made to the preferred options will affect the HRA conclusions, i.e. whether particular effects on European sites in and around Herefordshire are more or less likely to occur if the revised preferred options are implemented.
17. On this basis, the HRA conclusions reached in the November 2010 HRA report for the following policies needed to be reconsidered:
 - Rural Areas - **Policy RA1.**
 - Rural Areas - **Policy RA5.**
 - Market Towns - **Ross-on-Wye policy.**
 - Hereford - **Policy H1: City Centre.**
 - Hereford – **Policy H2: Movement.**
 - Hereford - **Policy H3: Growth Distribution.**
 - Hereford - **Policy H4: Northern Urban Expansions.**
 - Hereford - **Policy H5: Western Urban Expansions.**
18. In addition, the conclusions relating to the preferred option for Leominster also needed to be reviewed (as described above, the 2010 HRA was carried out on the basis of the preferred option for Leominster that was set out in the earlier Place Shaping Paper).

Conclusions of the draft November 2010 HRA Report

19. The draft conclusions from both the Screening and Appropriate Assessment (AA) stages of the November 2010 HRA Report, which needed to be reviewed to consider the revisions to the preferred options, are set out in

Table I below. The table shows which policies were able to be screened out of the assessment and where policies required further consideration through the Appropriate Assessment, as well as summarising the AA conclusions of this stage. It is these conclusions which needed to be revisited in light of the revisions to the preferred options. Note that **Table I** shows the HRA conclusions for all of the Core Strategy policies, and not just those affected by the revisions to the preferred options (the policies affected by the 2011 revisions are highlighted in **bold** in the table).

Table I: Summary of screening and AA findings for the 2010 Core Strategy Preferred Options (from November 2010 HRA Report)

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
Gl.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.
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

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?
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 and quality.
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.
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.
HI: Hereford City Centre Policy	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?
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.
H6: Southern Urban Expansion	Taken forward for AA.	Uncertain – effects may remain in relation to air pollution and water quantity and quality.

20. Where policies could not be screened out, they were taken forward to be considered further during the Appropriate Assessment stage of the HRA. The third column in the table above details the draft conclusions that were reached following the Appropriate Assessment of the whole Core Strategy in November 2010, and it can be seen that for all of the policies that have now been affected by the 2011 revisions to the preferred options, potential effects on European sites remained uncertain. These potential effects included air pollution and changes to water quality/availability. It is these conclusions that have been reviewed to understand the potential effects of the 2011 revised preferred options.
21. It should be noted that the Appropriate Assessment stage of the HRA for the Core Strategy is ongoing. Further work is still to be carried out to try to reduce the uncertainties remaining regarding the likely effects of a number of the Core Strategy policies following the November 2010 HRA report. For example, more technical information is needed in relation to the potential

effects on water quantity and quality in the River Wye, and this will be sought through further discussions with the Environment Agency, Natural England and Welsh Water. However, this work will be undertaken and reported on in a revised full HRA report at the Pre-Submission stage of the Core Strategy, so that the effects of the full suite of Core Strategy policies can be assessed.

3 Findings of the HRA Review

22. This note reports on the findings of the HRA review which has been carried out on the basis of the revised preferred options set out in the consultation leaflet '*Help Plan the Future of Herefordshire*' (September 2011). **Table 2** below sets out the assessment of whether the revised preferred options are likely to change the draft HRA conclusions reached for the relevant policies in the November 2010 HRA report.
23. On the basis of the assessment set out in **Table 2**, it has been concluded that none of the 2011 revised preferred options for the Herefordshire Core Strategy are likely to affect the overall HRA conclusions set out in the November 2010 HRA report in terms of the types of impact that are likely to occur. **However, the likelihood of the identified effects on European sites occurring has been increased slightly in some cases** (for Policies RA1: Rural Areas and RA5: Rural economy and H5: Hereford Western Urban Extension as summarised in **Table 3**). This is because the revisions generally comprise amendments to the quantity of development that was already planned and assessed through the HRA of the 2010 preferred options, rather than proposals for additional types of development in entirely new areas.
24. The exception to this is the proposal for a new employment land allocation of 5ha in size at Leominster that was not included in the proposals for Leominster in the Place Shaping Paper (January 2010). However, the types of effects that may result from this employment land allocation had already been identified in relation to the general increase in development that was previously proposed at Leominster. Therefore, there is no change to the HRA conclusion for Leominster as a result of the revised preferred option.

Table 2: Review of the November 2010 HRA conclusions in light of the 2011 revisions to the Core Strategy Preferred Options

Core Strategy policies which are affected by the revisions to the preferred options	Conclusions of the November 2010 HRA report in relation to the Core Strategy policy	Revisions made to the preferred options since the November 2010 HRA Report	Assessment of changes to the HRA conclusions in light of the revisions to the preferred options
<p>Rural Areas - Policy RAI: Rural areas</p>	<p>Effects may remain in relation to air pollution and water quantity and quality.</p> <p>The sites that may be affected by air pollution are:</p> <ul style="list-style-type: none"> • Cwm Cladach Woodlands SAC • Downton Gorge SAC • Usk Bat Sites • Wye Valley Woodlands SAC <p>The sites that may be affected by changes in water quantity are:</p> <ul style="list-style-type: none"> • Coed y Cerrig SAC • Lyppard Grange Ponds 	<p>The revised preferred option increases the housing numbers in rural areas and market towns by 800.</p>	<p>The increased housing allocation for the rural areas would result in an increase in the rural population and therefore associated impacts including increased vehicle traffic and demand for water supply would also be likely. Although the 800 additional homes represent a relatively small increase in the overall number of homes to be developed in the rural areas (the total allocation has increased from 4,500 to 5,300), the increase will make the potential effects already identified in relation to air quality, water quality and water quantity more likely to occur.</p>

Core Strategy policies which are affected by the revisions to the preferred options	Conclusions of the November 2010 HRA report in relation to the Core Strategy policy	Revisions made to the preferred options since the November 2010 HRA Report	Assessment of changes to the HRA conclusions in light of the revisions to the preferred options
	<p>SAC</p> <ul style="list-style-type: none"> • 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>The sites that may be affected by changes in water quality are:</p> <ul style="list-style-type: none"> • River Wye SAC 		
<p>Rural Areas - Policy RA5: Rural economy</p>	<p>Effects may remain in relation to air pollution and water quantity.</p> <p>The sites that may be affected by air pollution are:</p> <ul style="list-style-type: none"> • Cwm Cladach 	<p>The revised preferred option creates more local jobs.</p>	<p>The proposal to increase employment in the rural areas is likely to result in an increase in vehicle traffic movements, depending on the nature of the additional employment opportunities e.g. the potential for home working. In addition, demand for water supply to serve places of employment is also likely to increase, although again the extent to which this will occur will depend on the nature of</p>

Core Strategy policies which are affected by the revisions to the preferred options	Conclusions of the November 2010 HRA report in relation to the Core Strategy policy	Revisions made to the preferred options since the November 2010 HRA Report	Assessment of changes to the HRA conclusions in light of the revisions to the preferred options
	<p>Woodlands SAC</p> <ul style="list-style-type: none"> • Downton Gorge SAC • Usk Bat Sites • Wye Valley Woodlands SAC <p>The sites that may be affected by changes in water quantity are:</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 		<p>the employment sites and the activities undertaken. Overall, the revision to the preferred option means that the potential effects already identified in relation to air quality and water quantity are more likely to occur.</p>

Core Strategy policies which are affected by the revisions to the preferred options	Conclusions of the November 2010 HRA report in relation to the Core Strategy policy	Revisions made to the preferred options since the November 2010 HRA Report	Assessment of changes to the HRA conclusions in light of the revisions to the preferred options
	<ul style="list-style-type: none"> Walmore Common SPA/Ramsar Site 		
Market Towns - Ross-on-Wye policy	<p>Effects may remain in relation to water quantity and quality.</p> <p>The sites that may be affected by changes in water quantity are:</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>The sites that may be affected</p>	<p>The revised preferred option reduces the total number of homes to be provided over the plan period from 1,000 to 900 and the number in the Hildesley urban extension from 350 to 200.</p>	<p>The reduced housing allocation for Ross-on-Wye may make the identified effects relating to water quality and quantity less likely to occur, as demand for water supply and treatment should reduce in line with the lower housing allocation. However, the reduction represents a relatively small proportion of the overall housing allocation for the town, therefore the potential for these effects to occur still remains.</p>

Core Strategy policies which are affected by the revisions to the preferred options	Conclusions of the November 2010 HRA report in relation to the Core Strategy policy	Revisions made to the preferred options since the November 2010 HRA Report	Assessment of changes to the HRA conclusions in light of the revisions to the preferred options
	by changes in water quality are: <ul style="list-style-type: none"> • River Wye SAC 		
Hereford - Policy HI: City Centre	<p>Effects may remain in relation to air pollution and water quantity and quality.</p> <p>The sites that may be affected by air pollution are:</p> <ul style="list-style-type: none"> • Cwm Cladach Woodlands SAC • Downton Gorge SAC • Usk Bat Sites • Wye Valley Woodlands SAC <p>The sites that may be affected by changes in water quantity are:</p> <ul style="list-style-type: none"> • Coed y Cerrig SAC • Lyppard Grange Ponds 	<p>The revised preferred option increases the amount of retail floorspace from 40,000sqm to 46,000sqm.</p>	<p>The increase in retail floorspace in Hereford may make air pollution effects more likely to occur as vehicle movements may increase with more people travelling to and from shops in the city. However, in the context of all of the other proposals for the city which may also impact on air quality, and considering the relatively small proportional increase in the retail allocation, it is not considered that this revision will change the likelihood of the air quality impacts occurring, and this conclusion will remain unchanged. Similarly, although the increase in retail development may result in some extra demand for water supply and treatment, the relatively small increase in the allocation compared with the overall scale of development planned in the city centre, and considering the nature of retail developments, the likelihood of water quality and quantity effects occurring is not considered likely to be changed by this revision.</p>

Core Strategy policies which are affected by the revisions to the preferred options	Conclusions of the November 2010 HRA report in relation to the Core Strategy policy	Revisions made to the preferred options since the November 2010 HRA Report	Assessment of changes to the HRA conclusions in light of the revisions to the preferred options
	<p>SAC</p> <ul style="list-style-type: none"> • 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>The sites that may be affected by changes in water quality are:</p> <ul style="list-style-type: none"> • River Wye SAC 		
Hereford - Relief Road Option	<p>Effects may remain in relation to air pollution.</p> <p>The sites that may be affected</p>	<p>The route for the relief road has been slightly amended.</p>	<p>The changes that have been made to the route of the relief road are very minor, and it remains some distance from any European sites therefore direct physical impacts would still not occur. The air pollution effects identified in relation to the</p>

Core Strategy policies which are affected by the revisions to the preferred options	Conclusions of the November 2010 HRA report in relation to the Core Strategy policy	Revisions made to the preferred options since the November 2010 HRA Report	Assessment of changes to the HRA conclusions in light of the revisions to the preferred options
	by air pollution are: <ul style="list-style-type: none"> • Cwm Cladach Woodlands SAC² • Downton Gorge SAC • Usk Bat Sites SAC • Wye Valley Woodlands SAC 		2010 preferred option may still occur as this impact would not be affected by the very minor change to the route of the southern part of the road.
Hereford - Policy H3: Growth Distribution	Effects may remain in relation to air pollution and water quantity and quality . The sites that may be affected by air pollution are: <ul style="list-style-type: none"> • Cwm Cladach 	The revised preferred option reduces the overall amount of new homes to be built in Hereford by 2,000, mainly as a result of reduced housing allocations at Holmer West and the removal of the housing allocation at Whitecross. It also removes the employment site at	The reduced housing numbers in Hereford and the removal of the employment land allocation at Holmer East will reduce the additional demand for water supply and treatment as well as the additional vehicle traffic resulting from development; however significant new development is still planned and so the potential for these effects to occur still remains .

² It should be noted that the conclusions of the November 2010 draft HRA report pre-dated the completion of the HRA Screening report for the Hereford Relief Road options. Therefore, the conclusions from the Relief Road HRA Screening will be reviewed and reflected in the full HRA report at the Pre-Submission stage of the Core Strategy.

Core Strategy policies which are affected by the revisions to the preferred options	Conclusions of the November 2010 HRA report in relation to the Core Strategy policy	Revisions made to the preferred options since the November 2010 HRA Report	Assessment of changes to the HRA conclusions in light of the revisions to the preferred options
	<p>Woodlands SAC</p> <ul style="list-style-type: none"> • Downton Gorge SAC • Usk Bat Sites • Wye Valley Woodlands SAC <p>The sites that may be affected by changes in water quantity are:</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 	<p>Holmer East.</p>	

Core Strategy policies which are affected by the revisions to the preferred options	Conclusions of the November 2010 HRA report in relation to the Core Strategy policy	Revisions made to the preferred options since the November 2010 HRA Report	Assessment of changes to the HRA conclusions in light of the revisions to the preferred options
	<ul style="list-style-type: none"> • Walmore Common SPA/Ramsar Site <p>The sites that may be affected by changes in water quality are:</p> <ul style="list-style-type: none"> • River Wye SAC 		
<p>Hereford - Policy H4: Northern Urban Expansions</p>	<p>Effects may remain in relation to air pollution and water quantity and quality.</p> <p>The sites that may be affected by air pollution are:</p> <ul style="list-style-type: none"> • Cwm Cladach Woodlands SAC • Downton Gorge SAC • Usk Bat Sites • Wye Valley Woodlands SAC <p>The sites that may be affected by changes in water quantity</p>	<p>The revised preferred option reduces the number of homes at Holmer West and removes the employment site at Holmer East. The allocation for a new primary school at Holmer West has also been removed and is now planned at Three Elms instead.</p>	<p>The reduced housing numbers to the north of Hereford will reduce the extent to which demand for water supply and treatment increases, and will reduce the amount of additional vehicle traffic resulting from development; however significant new development is still planned and so the potential for these effects to occur still remains.</p>

Core Strategy policies which are affected by the revisions to the preferred options	Conclusions of the November 2010 HRA report in relation to the Core Strategy policy	Revisions made to the preferred options since the November 2010 HRA Report	Assessment of changes to the HRA conclusions in light of the revisions to the preferred options
	<p>are:</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>The sites that may be affected by changes in water quality are:</p> <ul style="list-style-type: none"> • River Wye SAC 		
Hereford - Policy H5: Western Urban Expansions	Effects may remain in relation to air pollution and water quantity and quality .	The revised preferred option removes the allocation for new homes at Whitecross and the primary school previously	The reduced housing numbers to the west of Hereford will reduce the extent to which demand for water supply and treatment will increase, and will reduce the amount of additional vehicle traffic

Core Strategy policies which are affected by the revisions to the preferred options	Conclusions of the November 2010 HRA report in relation to the Core Strategy policy	Revisions made to the preferred options since the November 2010 HRA Report	Assessment of changes to the HRA conclusions in light of the revisions to the preferred options
	<p>The sites that may be affected by air pollution are:</p> <ul style="list-style-type: none"> • Cwm Cladach Woodlands SAC • Downton Gorge SAC • Usk Bat Sites • Wye Valley Woodlands SAC <p>The sites that may be affected by changes in water quantity are:</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 	<p>planned at Whitecross will now be built at Three Elms instead.</p>	<p>resulting from development; however significant new development is still planned and so the potential for the water-related effects to occur still remains. In addition, the fact that the primary school is now to be built at the Three Elms site instead of at Whitecross may increase the volume of vehicle traffic in the area, therefore the likelihood of air quality impacts occurring may increase slightly.</p>

Core Strategy policies which are affected by the revisions to the preferred options	Conclusions of the November 2010 HRA report in relation to the Core Strategy policy	Revisions made to the preferred options since the November 2010 HRA Report	Assessment of changes to the HRA conclusions in light of the revisions to the preferred options
	<p>SAC/SPA/Ramsar Site</p> <ul style="list-style-type: none"> • Usk Bat Sites SAC • Walmore Common SPA/Ramsar Site <p>The sites that may be affected by changes in water quality are:</p> <ul style="list-style-type: none"> • River Wye SAC 		
<p>Market Towns – Leominster</p>	<p>Effects may remain in relation to water quantity and quality.</p> <p>The sites that may be affected by changes in water quantity are:</p> <ul style="list-style-type: none"> • Coed y Cerrig SAC • Lyppard Grange Ponds SAC • Rhos Goch SAC • River Usk SAC • River Wye SAC 	<p>The housing allocation for the town has been reduced by 200 and a new allocation has been made for 5ha of employment land at the urban extension.</p>	<p>The reduced housing numbers at Leominster will reduce the extent to which demand for water supply and treatment increases; however significant new housing development is still proposed. In addition, the new employment land allocation may result in further demand for water supply and treatment, and so the potential for these effects to occur still remains.</p>

Core Strategy policies which are affected by the revisions to the preferred options	Conclusions of the November 2010 HRA report in relation to the Core Strategy policy	Revisions made to the preferred options since the November 2010 HRA Report	Assessment of changes to the HRA conclusions in light of the revisions to the preferred options
	<ul style="list-style-type: none"> • Severn Estuary SAC/SPA/Ramsar Site • Usk Bat Sites SAC • Walmore Common SPA/Ramsar Site <p>The sites that may be affected by changes in water quality are:</p> <ul style="list-style-type: none"> • River Wye SAC 		

Table 3: Summary of changes to November 2010 HRA conclusions arising from the 2011 revised preferred options

2010 Preferred Option	Conclusion from November 2010 HRA Report	Implications for HRA conclusions of the 2011 revised preferred options
RA1: Rural areas	Uncertain – effects may remain in relation to air pollution, water quality and water quantity.	The potential effects already identified in relation to air quality, water quality and water quantity are now more likely to occur.
RA5: Rural economy	Uncertain – effects may remain in relation to air pollution and water quantity.	The potential effects already identified in relation to air quality and water quantity are now more likely to occur.
Market Towns - Ross-on-Wye policy	Uncertain – effects may remain in relation to water quantity and quality.	The potential for these effects to occur still remains.
Hereford - Policy H1: City Centre	Uncertain – effects may remain in relation to air pollution and water quantity and quality.	The potential for these effects to occur still remains.
Hereford - Relief Road Option	Uncertain – effects may remain in relation to air pollution.	The potential for this effect still remains.
Hereford - Policy H3: Growth Distribution	Uncertain – effects may remain in relation to air pollution and water quantity and quality.	The potential for these effects still remains.
Hereford - Policy H4: Northern Urban Expansions	Uncertain – effects may remain in relation to air pollution and water quantity and quality.	The potential for these effects still remains.
Hereford - Policy	Uncertain – effects may	The potential for

2010 Preferred Option	Conclusion from November 2010 HRA Report	Implications for HRA conclusions of the 2011 revised preferred options
H5: Western Urban Expansions	remain in relation to air pollution and water quantity and quality.	the water-related effects to occur still remains. The likelihood of air quality impacts occurring may be slightly increased.
Market Towns – Leominster	Uncertain – effects may remain in relation to water quantity and quality.	The potential for these effects still remains.

NEXT STEPS

25. As explained earlier, the uncertainties regarding the likelihood of certain impacts affecting particular European sites in and around Herefordshire are still being assessed as part of the ongoing AA stage for the full Core Strategy. Further discussions with the Environment Agency, Natural England and Welsh Water need to take place to fully understand the potential for adverse effects on water quality and quantity. In addition, the detailed consultation comments provided by Natural England and Countryside Council for Wales on the November 2010 HRA report will be addressed. This work will be undertaken and reported on in a revised full HRA report at the Pre-Submission stage of the Core Strategy, so that the effects of the full suite of Core Strategy policies as a whole can be assessed.

Land Use Consultants

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