

Habitats Regulations Assessment



Marden Neighbourhood Area

February 2015

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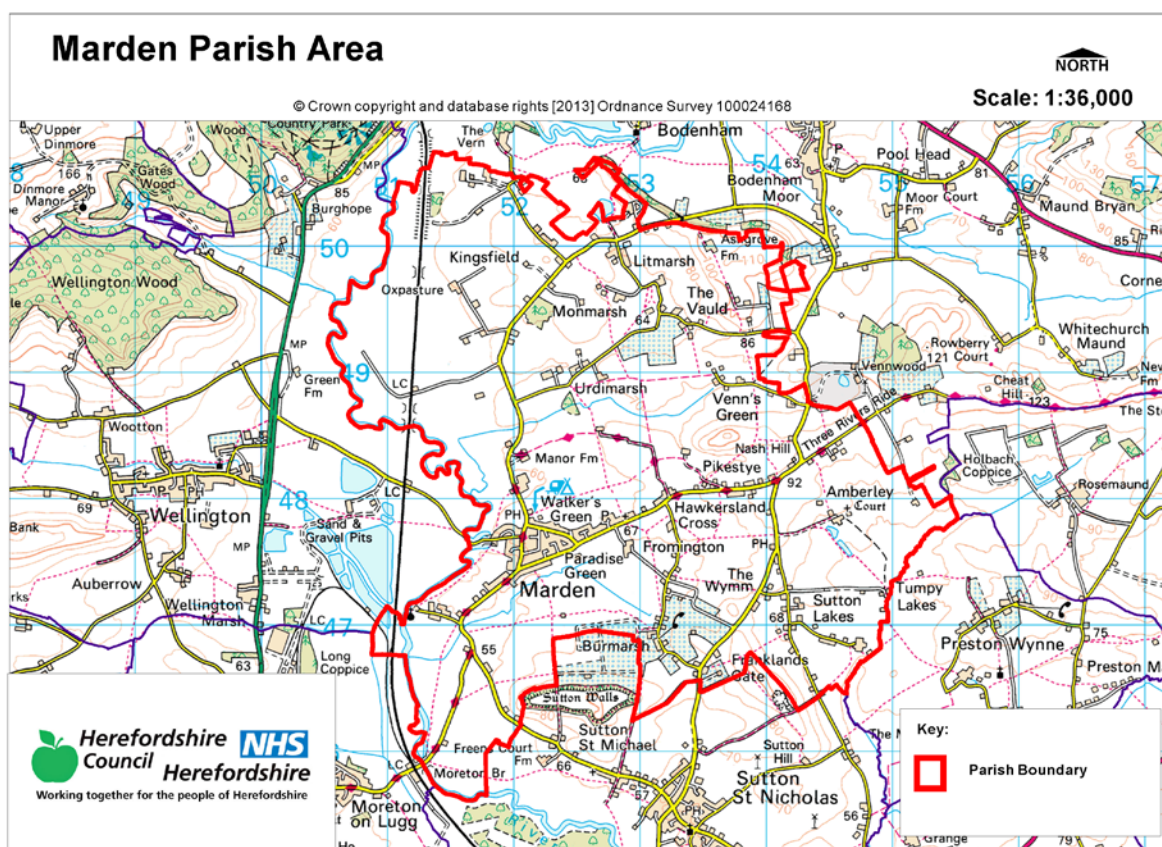
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Appendix 1: Initial SEA Screening Report (January 2014)

Appendix 2: Screening of policy matrix

1.0 Introduction

- 1.1 This Screening Assessment relates to a Neighbourhood Development Plan (NDP) that is considered to be in general conformity with higher level strategic plans, such as the Herefordshire Local Plan (Core Strategy) and the National Planning Policy Framework. The screening stage involves assessing broadly whether the Draft Marden NDP is likely to have a significant effect on any European site(s).
- 1.2 Marden Parish Council is preparing an NDP for whole administrative area of the parish, in order to set out the vision, objectives and policies for its development of the Parish up to 2031 (Draft plan January 2015, being assessed).
- 1.3 The NDP allocates sites for housing and provides general policies that clarify and add locally specific detail to the policies within the Herefordshire Local Plan (Core Strategy). Therefore it requires a high level screening assessment to build upon the HRA Screening Assessment Report undertaken in respect of strategic policies.
- 1.4 This high level screening assessment, which should be read in conjunction with the Pre-submission publication of the Herefordshire Local Plan (Core Strategy) and Habitat Regulations Assessment Report (May 2014), ensures that there will not be any significant impacts upon Natura 2000 sites.
- 1.4 The map below shows Marden Neighbourhood Area and parish boundary.



2.0 The requirement to undertake Habitats Regulations Assessment of plans

2.1 The requirement to undertake HRA of development/neighbourhood plans was confirmed by the amendments to the "Habitats Regulations" published for England and Wales in July 2007 and updated in 2013. Therefore when preparing its NDP, Marden Parish Council is required to carry out an assessment known as "Habitats Regulations Assessment" pursuant to Reg 32 Schedule 2 Neighbourhood Planning Regulations.

2.2 Article 6(3) of the EU Habitats Directive provides that:

'Any plan or project not directly connected with or necessary to the management of the [European] site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public'.

2.3 HRA is an impact-led assessment and refers to the assessment of the potential effects of a development plan on one or more European sites, including Special Protection Areas (SPAs) and Special Areas of Conservation (SACs):

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

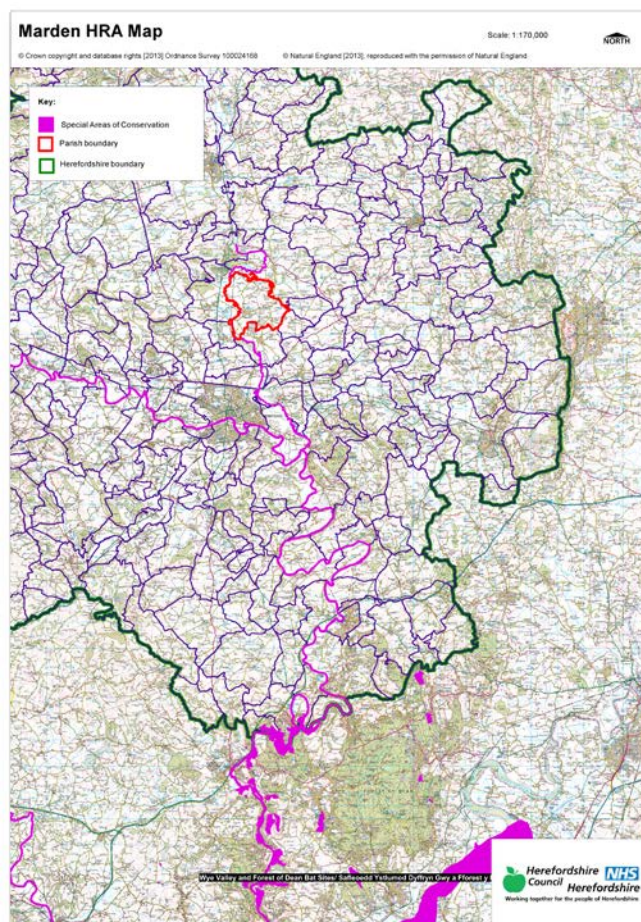
2.4 For ease of reference during HRA, general practice has been that these three designations are collectively referred to as either **Natura 2000** or **European sites**. This means that a Screening Assessment is carried out with regard to the Conservation Objectives of the European Sites and with reference to other plans or projects to identify if any significant effect is likely for any European Site.

3.0 Methodology

- 3.1 As the Marden NDP is not directly connected with the management of any European sites, and includes proposals for development which may affect European sites, it is necessary under Regulation 102(1)(a) of the Habitats Regulations 2010 to undertake screening for likely significant effects on European sites.
- 3.2 The HRA of NDPs is undertaken in stages and should conclude whether or not a proposal or policy in a neighbourhood plan would adversely affect the integrity of the site in question. This is judged in terms of the implications of the plan for a site's 'qualifying features' (i.e. those Annex I habitats, Annex II species, and Annex I bird populations for which it has been designated) and are measured with reference to the conservation objectives for those qualifying features as defined by Natural England.
- 3.3 The first process is to undertake an initial screening report to determine the need to undertake the requirement for a HRA; this initial screening identifies whether the NDP would impact upon any European site that could be within the neighbourhood area or nearby.
- 3.4 If a European Site is within the neighbourhood area or the neighbourhood area could impact upon a European site then this will need to be taken into account and a full screening assessment must be undertaken.
- 3.5 The full screening stage consists of a description of the plan, identification of potential effects on European Sites, assessing the effects on European Sites (taking into account potential mitigation provided by other policies in the plan). In the context of NDPs, the outcome should demonstrate there are no likely effects upon the European sites. If any likely effects occur there will be a need to make amendments to the NDP, which will then have to be re-screened until all likely effects have been mitigated.

4.0 Results of the Initial Screening Report and options

- 4.1 The initial Screening Report (29 August 2013) shown in Appendix 1 revealed that the River Wye (including the River Lugg) SAC is located less than 1km away from the western edge of the Marden neighbourhood area and therefore a full screening assessment would be required.
- 4.2 The following map highlights the location of River Wye SAC in relation to the neighbourhood area.



- 4.3 European sites can be sensitive to changes in water quantity and quality. As outlined within the Habitat Regulation Assessment to the Herefordshire Local Plan (Core Strategy), the water supply in this area comes from Dwr Cymru Welsh Water (DCWW) and no likely significant effects on European sites as a result of changes in water quality are expected in relation to the proportional growth outlined with the Herefordshire Local Plan (Core Strategy).
- 4.4 In relation to water quality, the preparation of the Nutrient Management Plan for the River Wye SAC should ensure that developments within the area can be accommodated by existing water discharge permits and would not be likely to have a significant effect upon the River Wye SAC.
- 4.5 For full details of the River Wye's attributes which contribute to and define their integrity and vulnerable data see Appendix 1 of the Marden Initial Screening Report (Full report in Appendix 1 of this HRA report).
- 4.6 Options for initial policy choices have been assessed to determine their environmental impact on the River Wye SAC (refer to Appendix 2). In general, the majority of the options concerning new development would appear to depend on location and scale in relation to environmental impact.

5.0 Description of the Marden NDP

- 5.1 The Draft Marden NDP presents criteria based policies and associated site allocations for development in the neighbourhood area, which is equivalent to the administrative parish boundary, up to 2031.
- 5.2 The NDP sets out the vision for the parish over the plan period and seven objectives for achieving this vision on the ground. These objectives are as follows:
1. To deliver a vibrant village centre through a level of housing growth that is proportionate to the size and scale of Marden village and the surrounding countryside so that it retains its rural character.
 2. To ensure that housing development in the surrounding hamlets of Litmarsh, Burmarsh, The Vauld and other hamlets is managed appropriately.
 3. To ensure all new development is informed by best practices current at the time of development and is designed to be in keeping with the surrounding character of the parish while promoting a heterogeneous appearance.
 4. To ensure that new housing is provided in a suitable range of tenures, types, sizes, affordability ranges and is flexible in usage so that local people of all ages can continue to live in the parish in a suitable home, whilst families are attracted to the area and local housing needs are met.
 5. To ensure that Marden has the appropriate local and community facilities to support present demand, future projected growth and demographic change. Developments must make a positive and tangible impact on the range and availability of community facilities and infrastructure by creating a focal point for the village.
 6. To welcome employment opportunities including working from home while ensuring current, new or expanded businesses within the parish are sympathetic to the environment or residential amenity.
 7. To ensure that the natural and built environment of the parish is protected and enhanced for future generations through sustainable development by protecting key environmental and heritage assets (e.g. green spaces and landscapes, natural environment designations) and taking account of constraints.
- 5.3 The Neighbourhood Plan also sets out 13 general policies on themes based on the objective headings above:
- Policy M1: Scale and type of new housing development
 - Policy M2: Scale and type of new housing development in the countryside
 - Policy M3: Scale and type of new housing development in designated hamlets
 - Policy M4: General design principles
 - Policy M5: Ensuring an appropriate range of tenures, types and sizes of houses
 - Policy M6: Protection/extension of local community facilities
 - Policy M7: New local employment opportunities
 - Policy M8: Supporting, enhancing and protecting existing local employment
 - Policy M9: Supporting development of communications infrastructure
 - Policy M10: Protection of local greenspaces
 - Policy M11: Landscape character
 - Policy M12: Surface water runoff
 - Policy M13: Public rights of way/connectivity

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

- 6.1 Regulation 102 of the Habitats Regulations 2010 requires an appropriate assessment where a land use plan (not directly connected with or necessary to the management of the site) is likely to have a significant effect on a European site, either alone or in combination with other plans or projects. It should be noted, however, that NDP cannot be Made (adopted) if likely significant effects occur.
- 6.2 There are a number of potentially relevant plans and projects which may result in in-combination effects with the Herefordshire Local Plan (Core Strategy), and these plans have been reviewed and can be found at Appendix 2 of the Pre-submission publication of the Herefordshire Local Plan (Core Strategy) Habitats Regulations Assessment (May 2014).
- 6.3 Whilst the Marden NDP allocates two sites for housing, neither these allocations nor the supporting policies, as well as its general plan policies would result in greater levels of development than envisaged by strategic policies, as set out in the Herefordshire Local Plan (Core Strategy). Therefore this review will suffice for the purposes of the NDP. Adjacent neighbourhood plans (Wellington, Sutton St Nicholas, Bodenham and to a lesser extent Moreton on Lugg) are at varying stages of their production, but none of the proposals within these plans go over and above the requirements set within the Local Plan (Core Strategy) for their respective neighbourhood areas at this stage.
- 6.4 The HRA for the Local Plan (Core Strategy) also identifies that both the Water Cycle Study for Herefordshire, which indicates the potential for planned water abstraction requirements combined with pressures on European Sites from the plan’s policies, and the work on the Nutrient Management Plan, to ensure the favourable conservation status of the SAC in respect of phosphate levels as soon as possible and at the latest by 2027, have both been considered as part of the in-combination assessment.

7.0 Assessment of the 'likely significant effects' of the Marden NDP

- 7.1 As required under Regulation 102 of the Habitats Regulations 2010, a Screening Assessment has been undertaken to identify the 'likely significant effects' of the NDP. This involved the preparation of a screening matrix, which determined whether any of the policies and allocations in the NDP would be likely to have a significant effect on the River Wye SAC.
- 7.2 The findings of the screening matrix can be found in Appendix 2 of this report. Colour coding was used to record the likely impacts of the policies (as well as associated site allocations) on the European site and its qualifying habitats and species as shown in the table below.

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

- 7.3 The screening matrix took the approach of screening each policy and objective individually, which is consistent with current guidance. The results from the HRA report for the Pre-submission version of the Herefordshire Local Plan (Core Strategy) were also taken into consideration.
- 7.4 Mitigation of some of the identified potential effects could be achieved through implementation of the other policies within the NDP and the Local Plan (Core Strategy), subject to EiP outcome. The Marden NDP will safeguard any proposal or development against detrimental impacts on the environment within Policies M4 and M11 in particular.

8.0 Conclusions from the Screening Matrix

- 8.1 None of the Marden NDP objectives and policies (January 2014) were concluded to be likely to have a significant effect on the River Wye SAC. This conclusion is based on assumptions and information contained within the Marden NDP, the Pre-submission version of the HRA for the Local Plan (Core Strategy) and the Herefordshire Local Plan (Core Strategy), albeit subject to EiP outcome.
- 8.2 In many cases this is because the policies themselves would not result in development, i.e. they related instead to criteria for development. In several cases the policies also included measures to help support the natural environment including biodiversity and they all have the potential to mitigate some of the possible adverse effects arising from other policies.
- 8.4 For those policies which relate to site allocations and could potentially have some impact upon the River Wye SAC, it was determined that due to the location of these sites, i.e. not directly on the river banks or adjacent to a watercourse that feeds into the river, and due to the scale of growth that is required by the Local Plan (Core Strategy), their proposed allocation would not have an appreciable effect on the River Wye SAC.
- 8.5 On that basis no significant effect conclusion could be reached and it is also unlikely that the Marden NDP will have any in-combination effects with any plans from neighbouring parishes.
- 8.6 Therefore it is concluded that the **Marden NDP will not have a likely significant effect on the River Wye SAC.**
- 8.7 Any further amendments to the policies (post January 2015) will be re-screened if required and an addendum to this report will be produced.

Appendix 1

Initial Habitat Regulations Assessment and Strategic Environmental Assessment Screening Notification

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

Conservation of Habitats and Species Regulations 2010 (d)

Neighbourhood Area:	Marden Neighbourhood Area
Parish Council:	Marden Parish Council
Neighbourhood Area Designation Date:	14/10/2013

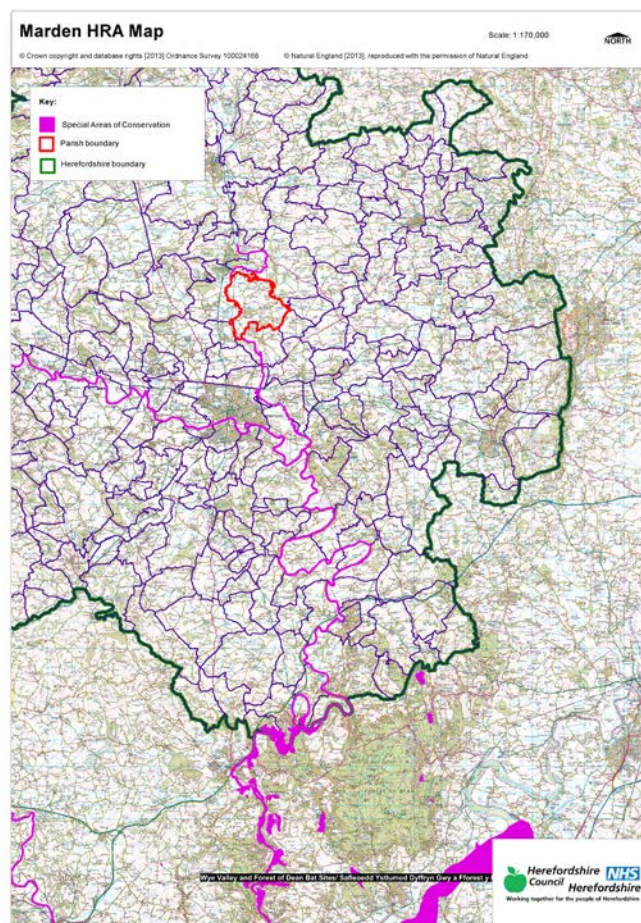
Introduction

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

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

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



Initial HRA Screening

River Wye (including the River Lugg) SAC:

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

Downton Gorge SAC:

Is the Neighbourhood Area within 10km of Downton Gorge SAC?	N	Downton Gorge is 23.8km away from the Parish
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River Clun SAC:

Does the Neighbourhood Area include: Border Group Parish Council or Leintwardine Group Parish Council?	N	River Clun does not border the Parish
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Usk Bat Sites SAC:

Is the Neighbourhood Area within 10km of the SAC boundary?	N	Usk Bat Sites are 43km away from the Parish
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Wye Valley & Forest of Dean Bat Sites SAC:

Is the Neighbourhood Area within 10km of any of the individual sites that make up the Wye Valley & Forest of Dean Bat Sites?	N	The Parish is 28.5km away from Wye Valley and Forest of Dean Bat Sites
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Wye Valley Woodlands SAC:

Is the Neighbourhood Area within 10km of any of the individual sites that make up the Wye Valley Woodlands Site?	N	The Parish is 31.4km away from the Wye Valley Woodlands
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HRA Conclusion:

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

European Site

(List only those which are relevant from above)

River Wye (including the River Lugg) SAC

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

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

SEA features	Total	Explanation	SEA required
Air Quality Management Areas	0	There are no AQMA's within the Parish	N
Ancient Woodland	5	Burling Wood; Venns Wood (border); Long Coppice (border); Wellington Wood (border); Dinmore Hill Wood (border)	Y
Areas of Archaeological Interest	0	There are no AAls within the Parish	N
Areas of Outstanding Natural Beauty	0	There are no AONBs within the Parish	N
Conservation Areas	3	Bodenham (border); Sutton St Nicholas (border); Wellington (border)	Y
European Sites	1	River Lugg	Y
Flood Areas		Flood Zones 2 & 3 run along the northern and western borders of the Parish	Y
Listed Buildings	Numerous	There are numerous Listed buildings throughout the Parish	Y
Local Sites (SWS/SINCs/RIGS)	7 (SWS)	River Lugg; Venns Wood (border); Sutton Hill Gravel Pit (border); Wellington Marsh (border); Wellington Wood and adjoining woodland (border); Dinmore Hill and adjoining woodland (border); Gravel Pits at Bodenham (border)	Y
Long distance footpaths/trails	1	Three Rivers Ride	Y
Mineral Reserves	6	Area 1 Moreton-on-Lugg and Wellington; Upper Paradise Farm to Marden Court, Marden; South of Moreton-on-Lugg (border); Bodenham Moor north west of Maund Bryan (border); East of Burmarsh, west of Sutton Lakes; Area around Wellington constrained by 200m zone and area north of Wellington outside 200m zone	Y
National Nature Reserve	0	There are no NNRs within the Parish	N
Registered & Unregistered parks and gardens	3	Venn Wood; The Vern (border); Dinmore Manor (border)	Y
Scheduled Ancient Monuments	3	Sutton Walls Camp (border); Freens Court Magnates residence, moat and fishponds, Sutton St Michael (border); Deserted Medieval Village, Sutton St Nicholas (border)	Y
Sites of Special Scientific Interest	3	River Lugg (Unfavourable Recovering); Wellington Wood (Unfavourable No	Y

		Change) (border); Dinmore Hill Woods (Favourable (part) Unfavourable Recovering (part)) (border)	
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Decision Notification:

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

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

Assessment date: 29/08/2013

Assessed by: James Latham

Appendix 1: European Sites

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

Downton Gorge
Site Features: <i>Tilio-Acerion</i> forests of slopes, screes and ravines
Vulnerability data: 10km for air quality associated with poultry units or other intensive agricultural practices.

River Clun
Site Features: Freshwater pearl mussel <i>Margaritifera margaritifera</i>
Vulnerability data: Water quality is important to maintain the site feature. Parishes either side of the River Clun will be affected.

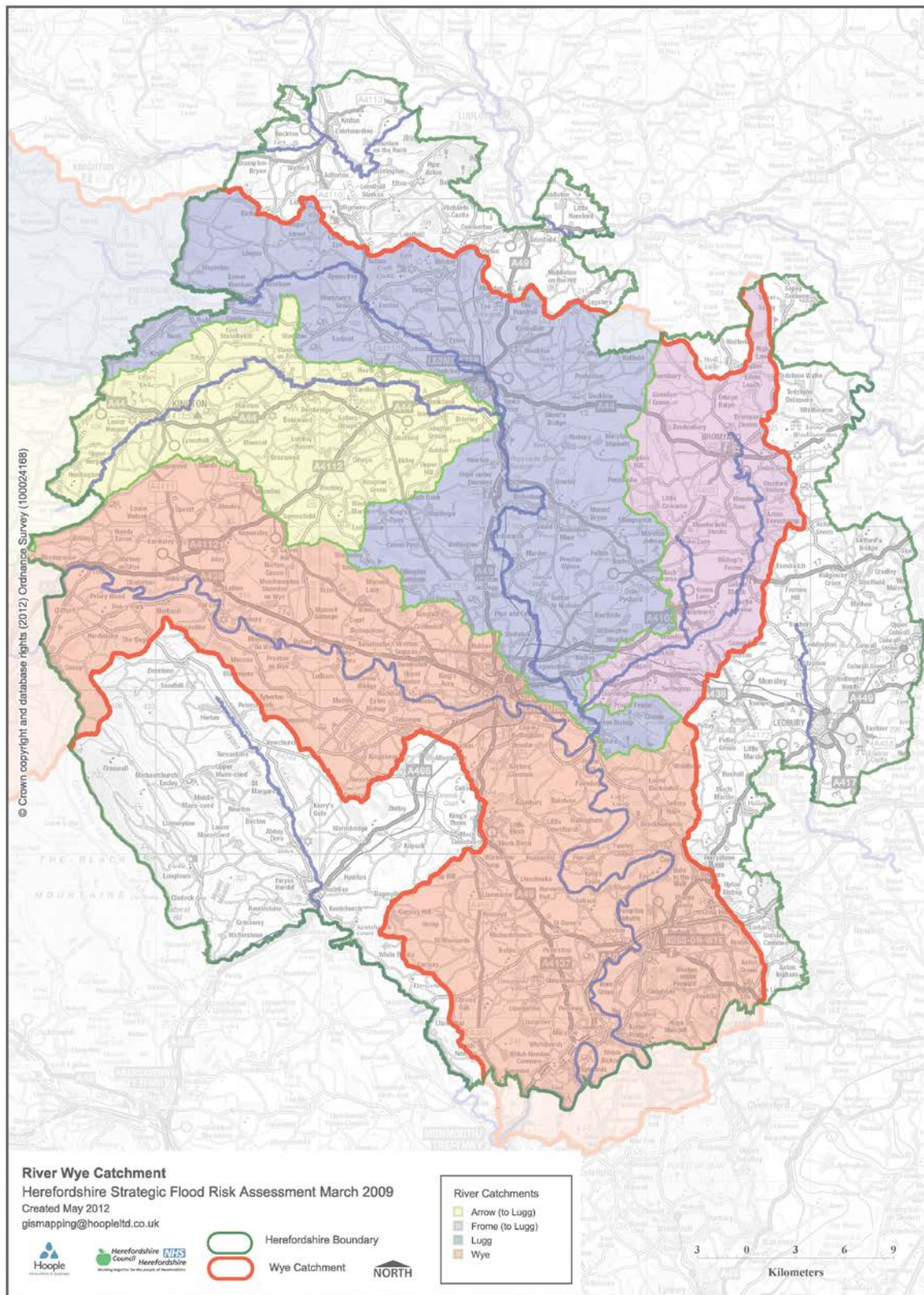
River Wye
Site Features: Water courses of plain to montane levels with the <i>Ranunculion fluitantis</i> and <i>Callitriche-Batrachion</i> vegetation. Transition mires and quaking bogs. White-clawed (or Atlantic Stream) crayfish <i>Austropotamobius pallipes</i> . Sea lamprey <i>Petromyzon marinus</i>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

Usk Bat Site
Site Features: Annex I habitats present as a qualifying feature, but not a primary reason for site selection: European dry heaths, Degraded raised bogs still capable of natural regeneration, Blanket bogs, Calcareous rocky slopes with chasmophytic vegetation, Caves not open to the public, <i>Tilio-Acerion</i> forests of slopes, screes and ravines. 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.
Vulnerability data: Lesser Horseshoe bats are known to migrate between 5km and 10km between their summer and winter roosts. The Lesser Horseshoe Bat is vulnerable to disturbance; light pollution; and habitat loss. Check with the planning ecologist for other issues.

Wye Valley and Forest of Dean Bat Sites
Site Features: Annex II species that are a primary reason for site selection: Lesser horseshoe bat <i>Rhinolophus hipposideros</i> . Greater horseshoe bat <i>Rhinolophus ferrumequinum</i>
Vulnerability data: Lesser Horseshoe bats are known to migrate between 5km and 10km between their summer and winter roosts. The Lesser Horseshoe Bat is vulnerable to disturbance; light pollution; and habitat loss. Check with the planning ecologist for other issues.
Greater Horseshoe bats are known to migrate between 20-30km between their summer and winter roosts.
NDPs closest to the European Site will need to consider: Woodland habitat buffer. Lesser Horseshoe Bat: Old buildings; woodland locations; sheltered valleys, extensive deciduous woods or dense scrub, close to roost sites. In areas of fragmented habitats, linear habitats such as hedgerows are important corridors. Vulnerable to loss or disturbance of both summer and winter roosts and removal of linear habitat. Greater Horseshoe Bat: Large buildings, pasture, edge of mixed deciduous woodland and hedgerows. Mixed land-use especially south-facing slopes, favours beetles, moths and insects they feed on. During the winter they depend on caves, abandoned mines and other underground sites for undisturbed hibernation. A system/series of sites required. Vulnerable to loss of insect food supply, due to insecticide use, changing farming practices and loss of broad-leaved tree-cover and loss / disturbance of underground roosts sites.

Wye Valley Woodlands
Site Features: Annex I habitats that are a primary reason for site selection: Beech forests <i>Asperulo-Fagetum</i> , <i>Tilio-Acerion</i> forests of slopes, screes and ravines, <i>Taxus baccata</i> woods of the British Isles. 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
Vulnerability data: Lesser Horseshoe bats are known to migrate between 5km and 10km between their summer and winter roosts. The Lesser Horseshoe Bat is vulnerable to disturbance; light pollution; and habitat loss. Check with the planning ecologist for other issues. NDPs closest to the European Site will need to consider: Woodland habitat buffer. Lesser Horseshoe Bat: Old buildings; woodland locations; sheltered valleys, extensive deciduous woods or dense scrub, close to roost sites. In areas of fragmented habitats, linear habitats such as hedgerows are important corridors. Vulnerable to loss or disturbance of both summer and winter roosts and removal of linear habitat.

Appendix 2: Wye Catchment Map



Appendix 2

NDP objectives	HRA Screening of NDP objectives and policies				
	Likely activities (operations) to result as a consequence of the objective/policy	Likely effect if objective/policy implemented. Could they have Likely Significant Effects on European Sites? (Yes/No, with reasons)	European Sites potentially affected	Mitigation measures to be considered, as necessary, through redraft of objective/option/policy.	Could the policy have any likely significant effects on European sites (taking mitigation into account)?
Option 1 Do nothing.	No NDP to determine planning applications.	Criteria policies within the Core Strategy would guide further development. Specific policies and proposals for the parish would not exist.	N/A	N/A	N/A
Option 2 Allocate sites for housing.	Small scale proportionate growth on specific sites identified on a proposals map.	Greater degree of certainty over the impact of future development on the River Wye SAC, as the location of housing would be pre-determined and not left to market forces.	River Wye (including the River Lugg) SAC	Specific environmental issues could be investigated during the site search and be positively addressed within the policy wording. Policy would need to take account of the proportional growth requirements of the Core Strategy and potential headroom capacity at the local STW.	No, development in line with the Local Plan (Core Strategy) and the policy safeguards which exist within the Core Strategy should avoid or mitigate any likely significant effects. Policy criteria should be included within the NDP which reflects this. Further assessments will be undertaken at draft policy stage.
Option 3 Manage future housing using a settlement boundary.	Small scale proportionate growth within a defined settlement boundary area.	Uncertain as to the impact on the River Wye SAC as dependant on the location of the development. The River Wye flows immediately west of Marden village.	River Wye (including the River Lugg) SAC	Additional criteria would be required when formulating the accompanying settlement boundary policy to ensure that no likely significant effects could occur. Policy would need to take account of the proportional growth requirements of the Core Strategy and potential headroom capacity at the local STW.	No, development in line with the Local Plan (Core Strategy) and the policy safeguards which exist within the Core Strategy should avoid or mitigate any likely significant effects. Policy criteria should be included within the NDP which reflects this. Further assessments will be undertaken at draft policy stage.

NDP objectives	HRA Screening of NDP objectives and policies				
	Likely activities (operations) to result as a consequence of the objective/policy	Likely effect if objective/policy implemented. Could they have Likely Significant Effects on European Sites? (Yes/No, with reasons)	European Sites potentially affected	Mitigation measures to be considered, as necessary, through redraft of objective/option/policy.	Could the policy have any likely significant effects on European sites (taking mitigation into account)?
Option 4 Allocate sites and identify a settlement boundary.	Small scale proportionate growth on specific sites identified on a proposals map and within a defined settlement boundary area.	Greater degree of certainty over the impact of future development on the River Wye SAC, as the location of housing would be pre-determined and the settlement boundary would provide a clear distinction between open countryside and the built environment.	River Wye (including the River Lugg) SAC	Specific environmental issues could be investigated during the site search and be positively addressed within the policy wording. Additional criteria would be required when formulating the accompanying settlement boundary policy to ensure that no likely significant effects could occur. Policy would need to take account of the proportional growth requirements of the Core Strategy and potential headroom capacity at the local STW.	No, development in line with the Local Plan (Core Strategy) and the policy safeguards which exist within the Core Strategy should avoid or mitigate any likely significant effects. Policy criteria should be included within the NDP which reflects this. Further assessments will be undertaken at draft policy stage.
Option 5 Manage future housing through a development management policy.	Small scale proportionate growth where the location would be determined by a criteria based policy.	Uncertain as to the impact on the River Wye SAC as dependant on the location of the development. The River Wye flows immediately west of Marden Common.	River Wye (including the River Lugg) SAC	Criteria based housing policy would require to include reference to mitigation measures to avoid any non-disturbance effects on the River Wye via its catchment. Policy would need to take account of the proportional growth requirements of the Core Strategy and potential headroom capacity at the local STW.	No, development in line with the Local Plan (Core Strategy) and the policy safeguards which exist within the Core Strategy should avoid or mitigate any likely significant effects. Policy criteria should be included within the NDP which reflects this. Further assessments will be undertaken at draft policy stage.
NDP Objectives					
Objective 1 ¹	Proportional growth in line with Policy RA1 of the Local Plan (Core Strategy).	N/A	N/A	N/A	No, this objective will not lead to development; rather it acknowledges that necessary growth will occur in Marden in line with the Local Plan (Core Strategy).

¹ Refer to Draft Plan for Policy Criteria

NDP objectives	HRA Screening of NDP objectives and policies				
	Likely activities (operations) to result as a consequence of the objective/policy	Likely effect if objective/policy implemented. Could they have Likely Significant Effects on European Sites? (Yes/No, with reasons)	European Sites potentially affected	Mitigation measures to be considered, as necessary, through redraft of objective/option/policy.	Could the policy have any likely significant effects on European sites (taking mitigation into account)?
Objective 2	Small scale proportional growth in line with Policy RA2 of Local Plan (Core Strategy).	N/A	N/A	N/A	No, this objective will not lead to development; rather it acknowledges that small scale growth will occur in smaller settlements in line with the Local Plan (Core Strategy).
Objective 3	Promoting measures to ensure that new developments and land based operations do not have an adverse effect upon the character of the parish.	N/A	N/A	N/A	No, this objective will not lead to development; rather it will seek to ensure that all development is built to the highest standards of energy efficiency.
Objective 4	Promoting measures to ensure that housing developments deliver a suitable range of tenures, types and sizes for residents.	N/A	N/A	N/A	No, this objective will not lead to development; rather it will help to ensure that housing developments match the spatial and financial requirements of residents, thus enabling them to remain in the parish.
Objective 5	Encourage and enhance the use of community facilities, as well as facilitating the provision and development of new ones.	New community facilities.	River Wye (including the River Lugg) SAC	<p>Policies M4 and M11 will help to avoid any adverse impacts on the River Wye for new community uses.</p> <p>Policy LD2 of the Local Plan (Core Strategy) will also help to avoid any unacceptable adverse impacts, subject to EiP outcome.</p>	No, this objective could result in the development of new community facilities or the loss of existing provision to new uses, which depending on location could have potential effect on the River Wye. However, sufficient policy safeguards are in place elsewhere within the NDP policy, all of which will help to avoid or mitigate any likely significant effects on the River Wye.

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	Likely activities (operations) to result as a consequence of the objective/policy	Likely effect if objective/policy implemented. Could they have Likely Significant Effects on European Sites? (Yes/No, with reasons)	European Sites potentially affected	Mitigation measures to be considered, as necessary, through redraft of objective/option/policy.	Could the policy have any likely significant effects on European sites (taking mitigation into account)?
Objective 6	Support for employment opportunities within the parish.	Employment and infrastructure development.	River Wye (including the River Lugg) SAC	<p>This policy should help to reduce the extent to which people need to travel to work especially in connection with policies to improve network connections.</p> <p>Policies M4 and M11 will help to avoid any adverse impacts on the River Wye for new employment or businesses premises.</p> <p>Policy LD2 of the Local Plan (Core Strategy) will also help to avoid any unacceptable adverse impacts, subject to EiP outcome</p>	No; this objective may have a positive effect on reducing the need to travel and there are policy safeguards within other NDP policies that will help mitigate potential likely significant effects.
Objective 7	Protection or enhancement of the parish's natural and built assets.	N/A	N/A	N/A	No, this objective will not lead to new development; rather it aims to ensure that all development proposed will protect or enhance Marden's landscape character, natural environment and cultural heritage assets, as well as habitats.
NDP Policies					

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	Likely activities (operations) to result as a consequence of the objective/policy	Likely effect if objective/policy implemented. Could they have Likely Significant Effects on European Sites? (Yes/No, with reasons)	European Sites potentially affected	Mitigation measures to be considered, as necessary, through redraft of objective/option/policy.	Could the policy have any likely significant effects on European sites (taking mitigation into account)?
Policy M1	<p>Policy to support the delivery of proportional growth in line with Local Plan (Core Strategy) Policy RA1.</p> <p>Development of two sites which the NDP proposes are allocated for housing.</p>	<p>Housing development within the settlement boundary and on allocated sites adjoining the settlement boundary.</p> <p>Land at New House Farm (60 dwellings) and Land at Rose Villa (5 dwellings) have been allocated for housing under this policy.</p> <p>Housing, infrastructure development and possible increase in recreational activities, vehicular movements and demand for water abstraction and treatment. Uncertain as to the impacts upon the River Wye SAC dependent on the location of development.</p>	River Wye (including the River Lugg) SAC	<p>Measures set within this policy itself, together with Policies M4 and M11 should help to avoid adverse impacts on the European site.</p> <p>Improved water efficiency measures, metering and addressing leakages in supply may help to mitigate any additional pressure placed on the water supply as a result of new developments.</p> <p>The implementation of Policies SD3 and SD4 within the Local Plan (Core Strategy), subject to EiP outcome, should help to avoid adverse impacts in relation to hydrological regimes at the River Wye.</p> <p>Water quality in the River Wye SAC is also specifically addressed through the Nutrient Management Plan produced by Natural England and the Environment Agency.</p>	No: this policy would allow for proportional levels of growth and supports the Local Plan (Core Strategy) Policy RA1. In any event, there are additional policy criteria in place within the NDP to avoid or mitigate any likely significant effects.

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	Likely activities (operations) to result as a consequence of the objective/policy	Likely effect if objective/policy implemented. Could they have Likely Significant Effects on European Sites? (Yes/No, with reasons)	European Sites potentially affected	Mitigation measures to be considered, as necessary, through redraft of objective/option/policy.	Could the policy have any likely significant effects on European sites (taking mitigation into account)?
Policy M2	Policy to support the delivery of rural exception housing or dwellings associated with rural enterprises in line with Policies RA3 and RA4 of the Local Plan (Core Strategy).	Some small scale housing development in unknown locations. Housing, infrastructure development and possible increase in recreational activities, vehicular movements and demand for water abstraction and treatment. Uncertain as to the impacts upon the River Wye SAC dependent on the location of development.	River Wye (including the River Lugg) SAC	Measures set within this policy itself, together with Policies M4 and M11 should help to avoid adverse impacts on the European site. Improved water efficiency measures, metering and addressing leakages in supply may help to mitigate any additional pressure placed on the water supply as a result of new developments. The implementation of Policies SD3 and SD4 within the Local Plan (Core Strategy), subject to EiP outcome, should help to avoid adverse impacts in relation to hydrological regimes at the River Wye. Water quality in the River Wye SAC is also specifically addressed through the Nutrient Management Plan produced by Natural England and the Environment Agency.	No: this policy would allow for restricted house building/replacement dwellings and supports the Local Plan (Core Strategy) Policies RA3 and RA4. In any event, there are additional policy criteria in place within the NDP to avoid or mitigate any likely significant effects.

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	Likely activities (operations) to result as a consequence of the objective/policy	Likely effect if objective/policy implemented. Could they have Likely Significant Effects on European Sites? (Yes/No, with reasons)	European Sites potentially affected	Mitigation measures to be considered, as necessary, through redraft of objective/option/policy.	Could the policy have any likely significant effects on European sites (taking mitigation into account)?
Policy M3	Policy to support the delivery of small market housing to meet the needs of local people in line with Local Plan (Core Strategy) Policy RA2.	Some small scale housing development in the hamlets. Housing, infrastructure development and possible increase in recreational activities, vehicular movements and demand for water abstraction and treatment. Uncertain as to the impacts upon the River Wye SAC dependent on the location of development, however the policy would result in small scale growth.	River Wye (including the River Lugg) SAC	Measures set within this policy itself, together with Policies M4 and M11 should help to avoid adverse impacts on the European site. Improved water efficiency measures, metering and addressing leakages in supply may help to mitigate any additional pressure placed on the water supply as a result of new developments. The implementation of Policies SD3 and SD4 within the Local Plan (Core Strategy), subject to EiP outcome, should help to avoid adverse impacts in relation to hydrological regimes at the River Wye. Water quality in the River Wye SAC is also specifically addressed through the Nutrient Management Plan produced by Natural England and the Environment Agency.	No: this policy would allow for small-scale growth and supports the Local Plan (Core Strategy) Policy RA2. In any event, there are additional policy criteria in place within the NDP to avoid or mitigate any likely significant effects.
Policy M4	Promote sustainable development measures for all new development across the parish.	N/A	N/A	N/A	No. This policy will not lead to development; rather it aims to ensure that new development coming forward under the other NDP policies contributes to sustainable development.
Policy M5	Suitable mix of homes provided in response to the spatial and financial requirements of local residents, in accordance with Policy H3 of the Local Plan (Core Strategy).	Uncertain as to the impacts upon the River Wye SAC dependent on the location of development.	N/A	N/A	No, this policy reiterates the criteria within Policy H3 of the Local Plan (Core Strategy). Additional policy criteria will avoid any likely significant effects.

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Policy M6	Encourage and enhance the use of community facilities, as well as facilitating extensions to existing provision.	<p>Extended community facilities and possible new provision.</p> <p>Possible vehicular movements and demand for water abstraction and treatment.</p>	River Wye (including the River Lugg) SAC	<p>Measures set within this policy itself, together with Policies M4 and M11 should help to avoid adverse impacts on the European site.</p> <p>Policy LD2 of the Local Plan (Core Strategy) will aim to help avoid any adverse impacts on the River Wye for new community uses, subject to EiP outcome.</p> <p>Improved water efficiency measures, metering and addressing leakages in the supply may help to mitigate any additional pressures on the water supply as a result of new development.</p> <p>Measures within Policy SD1 of the Local Plan (Core Strategy) should help to mitigate potential impacts relating to non-physical disturbances, subject to EiP outcome.</p> <p>The implementation of Policies SD3 and SD4 within the Local Plan (Core Strategy), subject to EiP outcome, should also help to avoid any adverse impacts in relation to the hydrological regimes at the River Wye.</p> <p>Water Quality in the River Wye is also being specifically addressed through the Nutrient Management Plan.</p>	No, although this policy could result in the development of new or extended community facilities, which depending on location could have potential effect on the River Wye, sufficient policy safeguards are in place within the NDP to avoid or mitigate any likely significant effects on the River Wye.

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	Likely activities (operations) to result as a consequence of the objective/policy	Likely effect if objective/policy implemented. Could they have Likely Significant Effects on European Sites? (Yes/No, with reasons)	European Sites potentially affected	Mitigation measures to be considered, as necessary, through redraft of objective/option/policy.	Could the policy have any likely significant effects on European sites (taking mitigation into account)?
Policy M7	Policy to encourage the provision and development of new employment land and premises.	<p>Employment and infrastructure development within the settlement boundary or on allocated sites.</p> <p>Possible vehicular movements and demand for water abstraction and treatment.</p>	River Wye (including the River Lugg) SAC	<p>Measures set within this policy itself, together with Policies M4 and M11 should help to avoid adverse impacts on the European site.</p> <p>Policy LD2 of the Local Plan (Core Strategy) will aim to help avoid any adverse impacts on the River Wye for new employment or businesses uses, subject to EiP outcome.</p> <p>Improved water efficiency measures, metering and addressing leakages in the supply may help to mitigate any additional pressures on the water supply as a result of new development.</p> <p>Measures within Policy SD1 of the Local Plan (Core Strategy) should help to mitigate potential impacts relating to non-physical disturbances, subject to EiP Outcome.</p> <p>The implementation of Policies SD3 and SD4 within the Local Plan (Core Strategy), subject to EiP outcome, should also help to avoid any adverse impacts in relation to the hydrological regimes at the River Wye.</p> <p>Water Quality in the River Wye is also being specifically addressed through the Nutrient Management Plan.</p>	<p>No: this policy is seeking to allow further small scale businesses. This may have a positive effect on reducing the need to travel.</p> <p>There are policy safeguards within Local Plan (Core Strategy) policies that will help mitigate potential likely significant effects.</p>

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Policy M8	Policy encourages the continued use of existing employment land and premises and would support the provision of expanded premises.	Employment and infrastructure development. Possible vehicular movements and demand for water abstraction and treatment.	River Wye (including the River Lugg) SAC	<p>This policy should help to reduce the extent to which people need to travel to work by allowing incumbent businesses the opportunity to expand.</p> <p>Policy LD2 of the Local Plan (Core Strategy) will aim to help avoid any adverse impacts on the River Wye for new employment or businesses uses, subject to EiP outcome</p> <p>Improved water efficiency measures, metering and addressing leakages in the supply may help to mitigate any additional pressures on the water supply as a result of new development.</p> <p>Measures within Policy SD1 of the Local Plan (Core Strategy) should help to mitigate potential impacts relating to non-physical disturbances, subject to EiP outcome.</p> <p>The implementation of Policies SD3 and SD4 within the Local Plan (Core Strategy), subject to EiP outcome, should also help to avoid any adverse impacts in relation to the hydrological regimes at the River Wye.</p> <p>Water Quality in the River Wye is also being specifically addressed through the Nutrient Management Plan.</p>	<p>No, this policy is seeking retention of existing businesses premises, which may have a positive effect on reducing the need to travel.</p> <p>There are policy safeguards within other NDP policies that will help mitigate potential likely significant effects.</p>

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	Likely activities (operations) to result as a consequence of the objective/policy	Likely effect if objective/policy implemented. Could they have Likely Significant Effects on European Sites? (Yes/No, with reasons)	European Sites potentially affected	Mitigation measures to be considered, as necessary, through redraft of objective/option/policy.	Could the policy have any likely significant effects on European sites (taking mitigation into account)?
Policy M9	Policy to encourage the provision of broadband infrastructure.	Depending on type and location of infrastructure: Physical damage or disturbance and or non-physical disturbance such as noise.	River Wye (including River Lugg) SAC	<p>Measures set within this policy itself, together with Policies M4 and M11 should help to avoid adverse impacts on the European site.</p> <p>Measures included within Policy SD1 of the Local Plan (Core Strategy) should help to mitigate potential impacts relating to non-physical disturbances, subject to EiP outcome.</p> <p>Good practice construction techniques including noise suppression measures, hours of operation may help to mitigate potential adverse effects during construction.</p>	No, as although this policy could result in the development of broadband infrastructure which, depending on its location, may have potential effect on the River Wye, sufficient policy safeguards are in place within the NDP to avoid or mitigate any likely significant effects on the River Wye.
Policy M10	Conservation of specific green areas of land.	N/A	N/A	N/A	No. This policy will not lead to development; rather it seeks to conserve areas of greenspace and prevent alternative forms of use, to the benefit of the natural environment and landscape character.
Policy M11	Requirement for development proposals to provide a greater level of analysis in terms of their effect on landscape character.	N/A	N/A	N/A	No, as the policy merely emphasises the importance of avoiding urban sprawl and enhancing landscapes which are identified within the evidence base as being sensitive.
Policy M12	Policy to minimise the likelihood of surface water running off development sites.	N/A	N/A	N/A	No. This policy will not lead to development; rather it seeks to ensure that development proposals incorporate whatever measures are necessary to maximise surface water retention.
Policy M13	Policy to support enhancements to public rights of way and other green networks.	N/A	N/A	N/A	No. This policy will not lead to development; rather it seeks to ensure that development proposals incorporate measures to maximise accessibility to residents and support opportunities to enrich biodiversity.