

Habitats Regulations Assessment



Border Group Neighbourhood Area

Addendum

November 2016

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Appendix 1: Revised list of options

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1.0 Introduction

- 1.1 To ensure that the requirements of the Habitats Directive and Regulations are met, it is necessary to consider the modifications through the HRA process to the draft Border Group NDP. The parish council are undertaking an additional reg14 draft consultation to ensure that all procedural issues regarding parish council approval have been sought prior to submission. Some changes have occurred between the first and second drafts of the NDP.
- 1.2 The purpose of this HRA Addendum Report is to detail the findings of the screening of proposed changes to policies and consider if they significantly affect the conclusions of the earlier HRA Report (December 2015).
- 1.3 The refinements are not considered to significantly affect the conclusions of the earlier HRA report.

2.0 Screening of proposed modifications to the NDP

- 2.1 Regulation 102 of the Habitats Regulations 2010 requires that a Screening Assessment be undertaken, in order to identify the 'likely significant effects' of a NDP. Accordingly, a screening matrix was prepared (December 2015) and this determined the extent to which any of the policies and the site allocation in the Border Group NDP would be likely to have a significant effect on the River Wye SAC, the River Clun SAC and Downton Gorge SAC.
- 2.2 The findings of the screening matrix can be found in Appendices 1 and 2 of that report (December 2015).
- 2.3 The screening matrix took the approach of screening each policy, objective and site allocation individually, which is consistent with current guidance. The results from the HRA reports for the Herefordshire Local Plan (Core Strategy) were also taken into consideration.
- 2.4 For full details of the European Sites' attributes which contribute to and define their integrity and vulnerable data see Appendix 1 of the Border Group Initial Screening Report. The Initial Screening Report, September 2014, can be found in Appendix 3 of the HRA report (December 2015). This information made it possible to identify the features of each site which determine site integrity, as well as the specific sensitivities of each site, therefore enabling later analysis of how the potential impacts of the Border Group Neighbourhood Plan may affect site integrity.
- 2.5 None of the Border Group NDP objectives and policies (December 2015) were concluded to be likely to have a significant effect on the European site. This conclusion is based on assumptions and information contained within the Border Group NDP, the Herefordshire Local Plan (Core Strategy) and the latest version of the HRA for the Local Plan (Core Strategy) published on the Council's website.
- 2.6 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 mitigation measures to help support the natural environment including biodiversity, and therefore no significant effect conclusion could be reached. These policies have the potential to mitigate some of the possible adverse effects arising from other policies within the NDP. Downton Gorge SAC is vulnerable to air quality associated with poultry units and other intensive agricultural practices, Border Group is not proposing either of these within its policies.
- 2.7 It was also concluded that the Border Group NDP will be unlikely to have any in-combination effects with any plans from neighbouring parishes, as any sites currently allocated in the adjacent parishes' NDP is within the parameters set out within the Herefordshire Local Plan (Core Strategy), in addition across the County border in Shropshire the development identified within the SAMDev Plan identified a number of criteria to ensure mitigation against any development so that a no adverse impact on the River Clun SAC could be reached. There are no Neighbourhood plans directly adjacent to Border Group within Shropshire.

2.8 Therefore it was concluded that the **Border Group draft NDP will not have a likely significant effect on the water quality of the River Wye SAC and the River Clun SAC nor air quality on the Downton Gorge SAC.**

2.9 The proposed amendments to the first Draft NDP following the Regulation 14 consultation are screened to consider if they are likely to significantly affect the findings of the previous HRA Report, prepared in December 2015. A summary of the main findings are provided below.

3.0 Summary of main findings following Regulation 14 consultation

3.1 The revised draft NDP incorporates suggestions made by consultees during the Regulation 14 Draft Plan consultation, by adding clarity and emphasis throughout the document. There have been some additions to the criteria in some of the policies which are strengthening up the protection of the area, encouraging active travel, and ensuring that the NPPF guidance of undertaking sequential and exception testing for flooding.

3.2 The plan is essential criteria based, and only allocates one site for development in Lingen. The sites is bordered by the Limebrook stream which is within the hydrological catchment of the River Lugg; a tributary of the River Wye SAC. The policy itself and the accompanying development brief contain a number of mitigation measures to ensure it has no significant impact.

3.3 In the HRA for the Core Strategy it states that only 1km of the River Clun SAC is within Herefordshire and none of the 4 settlements highlighted for proportional growth within the Border Group NDP are within the River Clun catchment area. It is acknowledged that the NDP policies will not have an adverse impact upon the River Clun SAC.

3.4 No poultry units or intensive agricultural practices are promoted within the plan, therefore the NDP will not have a likely significant effect on the Downton Gorge SAC

3.5 The revised NDP policies are therefore unlikely to result in significant effects on either of the European sites, a conclusion of which is based on assumptions and information contained within the Border Group NDP, the Herefordshire Local Plan (Core Strategy) and the latest version of the HRA for the Local Plan (Core Strategy). There is no likely in combination effects with the SAMDev proposals in Shropshire County.

4.0 Conclusion

4.1 With reference to section 3 above, amendments have been made to Policies BG6, BG10, BG13, BG15, BG16 and BG17. However none are considered to affect the findings of the previous HRA report. Policy BG14 includes reference to safeguards on water quality within the catchment area.

4.2 Therefore the earlier conclusion that the **Border Group NDP will not have a likely significant effect on the River Wye SAC and the River Clun SAC and Downton Gorge SAC** remains valid.

5.0 Next steps

5.1 This Addendum Report will be published alongside both the revised draft Reg14 NDP and earlier HRA Report for consultation. Any changes to the plan that arise from this consultation will be subject to further screening, in order to consider their impact on the water quality of the River Wye SAC and the River Clun SAC and the air quality of Downton Gorge SAC.

Appendix 1

Border Group Neighbourhood Development Plan

Options considered

Strategic

- Option 1 Do nothing
- Option 2 Rely on the Rural Area DPD
- Option 3 Neighbourhood Plan with allocations and designation of settlement boundary

Growth proportions

- Option 4 individual / very small
- Option 5 small
- Option 6 up to 10 dwellings
- Option 7 over 10 dwellings

Settlement boundary

- Option 8 within a settlement boundary
- Option 9 within and adjacent to a settlement boundary

Location of development

- Option 10 within Adforton
- Option 11 within Brampton Bryan
- Option 12 within Lingen
- Option 13 within Walford

Spread of development

- Option 14 spread around all 4 settlements
- Option 15 spread between 3 settlements (excluding Walford)
- Option 16 spread between 2 settlements
- Option 17 development in 1 settlement

Appendix 2

NDP options / objectives / policies	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?	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 Rely upon the Rural Areas Plan	Small scale proportionate growth where the location would be determined through a site allocation within the development plan document	Greater degree of certainty over the impact of future development on the European sites, 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 Clun SAC, Downton Gorge and River Wye (including 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.	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 (Preferred option) Neighbourhood plan with allocated 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 within a neighbourhood plan.	Greater degree of certainty over the impact of future development on the European sites, 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 Clun SAC, Downton Gorge and River Wye (including 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.	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 policy stage.
Option 4 Individual / small groups of dwellings	Small scale proportional growth, the location would be determine by criteria based policy	Greater degree of certainty over the impact of future development on the European sites, 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 Clun SAC, Downton Gorge and River Wye (including River Lugg) SAC	Specific environmental issues could be investigated during the site search and be positively addressed within the policy wording.	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 policy stage

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Option 5 Small groups of dwellings	Small scale proportional growth, the location would be determined by criteria based policy	Greater degree of certainty over the impact of future development on the European sites, 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 Clun SAC, Downton Gorge and River Wye (including River Lugg) SAC	Specific environmental issues could be investigated during the site search and be positively addressed within the policy wording.	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 policy stage
Option 6 Up to 10 dwellings	Small scale proportional growth, the location would be determined by site allocations within the plan.	Greater degree of certainty over the impact of future development on the European sites, 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 Clun SAC, Downton Gorge and River Wye (including River Lugg) SAC	Specific environmental issues could be investigated during the site search and allocation process. Additional criteria safeguards could be positively addressed within the accompanying policy wording.	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 policy stage
Option 7 Over 10 dwellings	Small scale proportional growth, the location would be determined by site allocations within the plan.	Greater degree of certainty over the impact of future development on the European sites, 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 Clun SAC, Downton Gorge and River Wye (including River Lugg) SAC	Specific environmental issues could be investigated during the site search and allocation process. Additional criteria safeguards could be positively addressed within the accompanying policy wording.	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 policy stage
Option 8 Development within settlement boundary	Small scale proportionate growth on specific sites identified on a proposals map and within a defined settlement boundary area within a neighbourhood plan.	Greater degree of certainty over the impact of future development on the European sites, 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 Clun SAC, Downton Gorge and River Wye (including River Lugg) SAC	Specific environmental issues could be investigated during the site search and allocation process. Additional criteria safeguards could be positively addressed within the accompanying policy wording.	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 policy stage

NDP options / objectives / policies	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?	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 9 Development within or adjacent to a settlement boundary	<p>Small scale proportionate growth on specific sites identified on a proposals map and within a defined settlement boundary area within a neighbourhood plan.</p> <p>Policy RA2 of the Core Strategy uses the terminology 'within and adjacent' to the built form of the settlement.</p>	<p>Greater degree of certainty over the impact of future development on the European sites, 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.</p>	<p>River Clun SAC, Downton Gorge and River Wye (including River Lugg) SAC</p>	<p>Specific environmental issues could be investigated during the site search and allocation process. Additional criteria safeguards could be positively addressed within the accompanying policy wording.</p>	<p>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.</p> <p>Policy criteria should be included within the NDP which reflects this. Further assessments will be undertaken at policy stage</p>
Option 10 Locate development within Adforton	<p>Adforton is included within the Core Strategy figure 4.14 for proportional growth. The A4110 runs north-south through the village. The brook also runs west-east separating the village.</p> <p>The village is not within the Lugg or the Clun catchment area</p>	<p>Any development site or criteria policy for Adforton will need to reflect the access and potential water issues within the settlement. This could also have an impact on the water quality in the wider catchment and the ability to reduce the vulnerability to climate change.</p>	<p>River Clun SAC, Downton Gorge and River Wye (including River Lugg) SAC</p>	<p>Specific environmental issues could be investigated during the site search and allocation process. Additional criteria safeguards could be positively addressed within the accompanying policy wording.</p>	<p>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.</p> <p>Policy criteria should be included within the NDP which reflects this. Further assessments will be undertaken at policy stage</p>
Option 11 Locate development within Brampton Bryan	<p>Brampton Bryan is included within the Core Strategy figure 4.14 for proportional growth. This is a historic estate village</p> <p>The village is not within the Lugg or the Clun catchment areas</p>	<p>Any development site or criteria policy for Brampton Bryan will need to reflect the historic heritage aspects of the settlement. This could also have an impact on the wider landscape and quality of the surroundings within the area.</p>	<p>River Clun SAC, Downton Gorge and River Wye (including River Lugg) SAC</p>	<p>Specific environmental issues could be investigated during the site search and allocation process. Additional criteria safeguards could be positively addressed within the accompanying policy wording.</p>	<p>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.</p> <p>Policy criteria should be included within the NDP which reflects this. Further assessments will be undertaken at policy stage</p>
Option 12 Locate development within Lingen	<p>Lingen is included within the Core Strategy figure 4.14 for proportional growth. The villages has a Conservation Area and a number of historic assets.</p> <p>The village is partly within the Lugg catchment area</p>	<p>Any development site or criteria policy for Lingen will need to reflect the historic heritage aspects of the settlement. This could also have an impact on the wider landscape and quality of the surroundings within the area. .</p>	<p>River Clun SAC, Downton Gorge and River Wye (including River Lugg) SAC</p>	<p>Specific environmental issues could be investigated during the site search and allocation process. Additional criteria safeguards could be positively addressed within the accompanying policy wording.</p>	<p>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.</p> <p>Policy criteria should be included within the NDP which reflects this. Further assessments will be undertaken at policy stage</p>

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Option 13 Locate development within Walford	Walford is included within the Core Strategy figure 4.15 for proportional growth. Prone to flooding (Zone 2 and 3), number of watercourses. The village is not within the Lugg or the Clun catchment areas	Any development site or criteria policy for Walford will need to reflect the flooding issues within the settlement. This could also have an impact on the water quality in the wider catchment and the ability to reduce the vulnerability to climate change.	River Clun SAC, Downton Gorge and River Wye (including River Lugg) SAC	Specific environmental issues could be investigated during the site search and allocation process. Additional criteria safeguards could be positively addressed within the accompanying policy wording.	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 policy stage
Option 14 Spread development between 4 settlements	This would reflect the policy within the Core Strategy which highlighted these four locations are suitable for proportionate growth.	Any development sites or criteria based policies would need to reflect the character and constraints of the individual settlements concerned.	River Clun SAC, Downton Gorge and River Wye (including River Lugg) SAC	Specific environmental issues could be investigated during the site search and allocation process. Additional criteria safeguards could be positively addressed within the accompanying policy wording.	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 policy stage
Option 15 Spread development between 3 settlements	Excludes Walford which is the smallest village within the list and included with para 4.15. Development within Brampton Bryan would need to remain as previous option due to lack of available sites. Therefore the majority of the development would be distributed between Adforton and Lingen.	Any development sites or criteria based policies would need to reflect the character and constraints of the individual settlements concerned.	River Clun SAC, Downton Gorge and River Wye (including River Lugg) SAC	Specific environmental issues could be investigated during the site search and allocation process. Additional criteria safeguards could be positively addressed within the accompanying policy wording.	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 policy stage
Option 16 Spread development between 2 settlements	Would require additional sustainable sites to be identified in Adforton and Lingen. This could result in the villages doubling in size and pressure being placed on the historic and natural environments of the two settlements	Any development sites or criteria based policies would need to reflect the character and the constraints of the individual settlements concerned.	River Clun SAC, Downton Gorge and River Wye (including River Lugg) SAC	Specific environmental issues could be investigated during the site search and allocation process. Additional criteria safeguards could be positively addressed within the accompanying policy wording.	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 policy stage

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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?	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 17 Development in one settlement	Placing all development within one settlement was seen as an impractical option.	Any development sites or criteria based policies would need to reflect the character and the constraints of the individual settlement concerned.	River Clun SAC, Downton Gorge and River Wye (including River Lugg) SAC	Specific environmental issues could be investigated during the site search and allocation process. Additional criteria safeguards could be positively addressed within the accompanying policy wording.	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 policy stage
NDP Objectives					
Objective 1 Increase supply of homes for local people (no changes)	Small scale proportional growth in line with policy RA2 of the Core Strategy.	Only Lingen is within the hydrological catchment of the River Lugg. No identified settlements are within close proximity to the River Clun SAC.	River Wye (including the River Lugg) SAC	Development will be small scale. Criteria may be required with regards to development proposals within Lingen to ensure that water quality issues are taken account of.	No, this objective will not lead to development itself; rather it acknowledges that proportional growth will occur across in highlighted settlements in the neighbourhood area in line with the Local Plan (Core Strategy).
Objective 2 Diversification within the rural economy (no changes)	Farm diversification, increased tourism activity, support for home working and producing local energy from alternative crops.	This will be locational dependant. Only a small area of the parish is within the catchment of the Clun and the southern parishes within the catchment of the Wye. Safeguards exist within the Core Strategy policies. Nutrient Management Plans exist for both the River Clun and the River Wye with regards to water quality and farming.	River Clun SAC and River Wye SAC	n/a	No, potential damage to the interests of species using the aquatic SACs would be significantly reduced by the criteria within various policies.
Objective 3 Increase road safety, reduce traffic and address surface water flooding (no changes)	Reduce effects of heavy traffic, address surface water on highway	n/a	n/a	n/a	No, the objective is aiming to improve road safety and reduce heavy traffic.
Objective 4 Improve access to local health and education (no changes)	Access to local facilities including health and education	n/a	n/a	n/a	No, the plan acknowledge the difficulties in supporting new community facilities in a rural area such as this. This objective is supporting small expansions of

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Objective 5 Character of landscape and settlements (minor wording change – not significant)	Use of brownfield land, protection of the character of conservation area	This will be locational dependant. Only a small area of the parish is within the catchment of the Clun and the southern parishes within the catchment of the Wye. Safeguards exist within the Core Strategy policies. Nutrient Management Plans exist for both the River Clun and the River Wye with regards to water quality and farming.	River Clun SAC and River Wye SAC	n/a	No, potential damage to the interests of species using the aquatic SACs would be significantly reduced by the criteria within various policies.
Policies					
Policy BG1 Promoting a Sustainable Community (no change)	Encourages small scale development to help create sustainable communities	No likely effects, safeguards existing within the Core Strategy and other policies of the NDP.	n/a	n/a	No. The policy would itself not lead to development; instead it relates to criteria for encouraging sustainable development and sustainable communities.
Policy BG2 Development Strategy (no change)	Encourages small scale development within identified settlements Small scale employment development	Only Lingen is within the hydrological catchment of the River Lugg.	River Wye (including the River Lugg) SAC	Development will be small scale. Criteria may be required with regards to development proposals within Lingen to ensure that water quality issues are taken account of.	No, adequate safeguards exist within the Core Strategy and other policies within the NDP. The criteria relating to Lingen could be further strengthened by additional reference to water quality.
Policy BG3 New homes in Adforton (no change)	Small scale development within the settlement boundary of Adforton	None, Adforton is outside of the hydrological catchments of the Wye/Lugg or Clun.	None	n/a	No, Adforton is outside of the hydrological catchments of the Wye/Lugg or Clun.
Policy BG4 New homes in Brampton Bryan (no change)	Small scale development through conversions and infill within Brampton Bryan	None, Brampton Bryan is outside of the hydrological catchments of the Wye/Lugg or Clun.	None	n/a	No, Brampton Bryan is outside of the hydrological catchments of the Wye/Lugg or Clun.
Policy BG5 New homes in Lingen (no change)	Small scale development within the development boundary of Lingen	Lingen is within the hydrological catchment of the River Lugg.	River Wye (including the River Lugg) SAC	Development will be small scale. Criteria may be required with regards to development proposals within Lingen to ensure that water quality issues are taken account of.	No, adequate safeguards exist within the Core Strategy and other policies within the NDP. The criteria relating to Lingen could be further strengthened by additional reference to water quality.

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Policy BG6 Land at the Nursery, Lingen (change to criteria d and development area of allocation)	Proposed housing site within the south of the village adjacent to the Limebrook stream	The Limebrook is part of the hydrological catchment of the River Lugg. Development would be small scale and the development brief indicated that discharging into the brook will not be acceptable.	River Wye (including the River Lugg) SAC	Policy relating to water quality and the provision of SuDs is included within Policy BG14. This will help strengthen the policy safeguards.	No, policy safeguards currently exist within the Core Strategy SD3 and the development brief included within the plan. Additional criteria within the policy BG14 strengthen this further.
Policy BG7 New homes in Walford (no change)	Small scale development within the settlement boundary of Walford	None, Walford is outside of the hydrological catchments of the Wye/Lugg or Clun.	None	n/a	No, Walford is outside of the hydrological catchments of the Wye/Lugg or Clun.
Policy BG8 Provision of affordable housing (no change)	Small scale housing development within the parish Small increase in traffic movements	This will be locational dependant. Only a small area of the parish is within the catchment of the Clun and the southern parishes within the catchment of the Wye. Safeguards exist within the Core Strategy policies. Nutrient Management Plans exist for both the River Clun and the River Wye	River Clun SAC and River Wye SAC	Many of these developments may deal with their waste water via non main drainage. These applications are subject to distance and volume screening criteria to ensure no likely significant effects on the River Wye SAC. The catchment area for the River Clun in Herefordshire is unlikely to be favourable in policy terms for this type of development.	No, this policy is in line with H2 of the Core Strategy. Sufficient safeguards exist within other policies
Policy BG9 Design criteria for residential development (no change)	Various design criteria to support development proposals including the treatment of waste water	The policy includes criteria for dealing with waste water which will have a positive mitigation effect on any potential adverse effects	River Clun SAC and River Wye SAC	This policy should help to mitigate potential adverse effects in relation to water quality	No, this policy will not itself lead to development, instead it relates to criteria for development. This policy criteria together with Policy SD4 of the Core Strategy provide the safeguard to protect both SACs from deterioration in water quality from developments within the parish.
Policy BG10 Supporting local business (wording changes to criterial v)	Development of small scale local businesses Increase in traffic movements Additional criteria to promote active travel	This will be locational dependant. Only a small area of the parish is within the catchment of the Clun and the southern parishes within the catchment of the Wye.	River Clun SAC and River Wye SAC	n/a	No, development will be small scale and adequate safeguards already exist within the Core Strategy and other policies of the NDP
Policy BG11 Broadband and mobile telephone infrastructure	Provision of infrastructure to facilitate broadband and mobile equipment	Installations are likely to be small scale or on existing facilities	n/a	n/a	No, development will be small scale and adequate safeguards already exist within the Core Strategy and other policies of the NDP

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(no change)					
Policy BG12 Renewable energy (no change)	Development of small scale renewable energy particularly solar and hydro	This will be locational dependant. Only a small area of the parish is within the catchment of the Clun and the southern parishes within the catchment of the Wye.	River Clun SAC and River Wye SAC	n/a	No, this policy could result in the development of small scale renewable energy infrastructure which could potentially affect two European Sites depending on its location. However, sufficient policy safeguards area included within the Core Strategy to avoid or mitigate a likely significant on any European Site.
Policy BG13 Highway and transport infrastructure (wording changes to criteria d)	Reduction in speeds and accessibility to public transport and additional criteria regarding active travel	This will be locational dependant. Only a small area of the parish is within the catchment of the Clun and the southern parishes within the catchment of the Wye. Safeguards exist within the Core Strategy policies.	River Clun SAC and River Wye SAC	n/a	No, adequate safeguards exist within the Core Strategy and other policies within the NDP such as LD2, SD1 and M1).
Policy BG14 Flooding and surface and foul water drainage (no change)	Reduce flooding and pollution of watercourses within the parish	The aim of this policy is to protect the River Lugg and Teme from pollution	River Clun SAC and River Wye SAC	Additional specific reference to the SACs would strengthen the policy further	No, the aim of this policy is to prevent pollution of any watercourse within the parish. Additional specific reference to the SACs would strengthen the policy further.
Policy BG15 Accessibility to service and facilities (wording changes)	Small scale expansion of existing community facilities and services and safeguarding of existing	n/a	n/a	n/a	No, any development is only likely to be small scale extensions and therefore not significant. Sufficient policy safeguards exist both with the Core Strategy and the NDP
Policy BG16 Retaining the natural environment and landscape (wording changes)	Policy to protect natural environment and features	n/a	n/a	The criteria includes reference to supporting the biodiversity value of designated sites	No, this policy seeks to protect features of the natural environment
Policy BG17 Protecting local heritage (wording changes)	Policy to protect heritage features	n/a	n/a	n/a	No, this policy is seeking to protect features of the heritage environment

NDP options / objectives / policies	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?	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 BG18 Lingen Conservation Area (no changes)	Design criteria for any development within the Lingen Conservation Area	n/a	n/a	n/a	No, policy safeguards exist within the NDP regarding development in Lingen. This policy is concerning design aspects within the Conservation Area.

Appendix 3

Consultation date: 14 December 2015 to 8 February 2016

Consultation title: Border Group Neighbourhood Plan Regulation 14

*N.B. This consultation feedback is **only** for comments received on the HRA of the draft Neighbourhood Development Plan (December 2015)*

Consultee	Summary of Comments	Response to Comments
Natural England	Section 8.3 needs to be reworded to take account of mains access being limited within the plan area and not available in Brampton Bryan, Lingen and Walford	Noted, reference updated within the addendum
English Heritage / Heritage England	No comments received	
Environment Agency	No comments received	
Natural Resources Wales	No comments received	