
**Huntley Neighbourhood Development Plan (HNDP)
2022-2026:
Consultation Draft July 2022**

**Strategic Environmental Assessment (SEA) &
Habitats Regulations Assessment (HRA)
Screening Report**

**August 2022
updated November 2022**

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Screening Report**

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1.0 INTRODUCTION

Strategic Environmental Assessment (SEA); Sustainability Appraisal (SA) & Habitats Regulations Assessment (HRA)

- 1.1 Strategic Environmental Assessment (SEA)¹ is a systematic process used during the preparation of plans and policies and it aims to provide a high level of protection for the environment; it contributes to the integration of environmental considerations in plan preparation with a view to promoting sustainable development.
- 1.2 Sustainability Appraisal (SA) is a process that similarly investigates plans and policies, including consideration of socio-economic factors in the same way as environmental factors and to the same level of detail. SA incorporating SEA is a mandatory requirement for Local Plans in accordance with planning legislation² and paragraph 32 of the National Planning Policy Framework (revised July 2021)³. Government advises⁴ that an integrated approach is taken so that the SA process incorporates the requirements for SEA – and to the same level of detail.
- 1.3 There is no statutory requirement⁵ for Neighbourhood Plans to be subject to SA. However, a qualifying body (in this case, Huntley Parish Council) must demonstrate how its plan will contribute to achieving sustainable development. In some limited circumstances, where a Neighbourhood Plan is likely to have significant environmental effects, it may require a SEA. This is determined through a SEA screening process. It is the responsibility of the local planning authority to ensure that all the regulations appropriate to the nature and scope of a neighbourhood plan submitted to it have been met.
- 1.4 Plan-makers are also required to consider whether a Habitats Regulations⁶ Assessment (HRA)/Appropriate Assessment (AA) is required. The aim of the HRA process is to assess the potential effects arising from a plan against the nature conservation objectives of any site designated for its nature conservation importance. The Neighbourhood Planning Regulations (2012, as amended) indicate that the making of an NDP is not likely to have a significant effect on a designated nature conservation site. However, a CJEU Judgment (People over Wind, 2018)⁷ clarified that when making screening decisions on whether an appropriate assessment is required, competent authorities cannot take into account any mitigation measures - such as

¹ Environmental Assessment of Plans and Programmes Regulations, 2004

<http://www.legislation.gov.uk/uksi/2004/1633/contents/made>

² Section 19(5) of the 2004 Act and Regulation 22(a) of the Town and Country Planning (Local Planning) (England) Regulations 2012

³ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

⁴ <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

⁵ <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

⁶ The Conservation of Habitats & Species Regulations 2010

<http://www.legislation.gov.uk/uksi/2010/490/contents/made>

⁷ <https://curia.europa.eu/juris/document/document.jsf?docid=200970&doclang=EN>

policies in a higher-level strategic plan. Mitigation measures intended to avoid or reduce the harmful effects of a plan can only be taken into account as part of an appropriate assessment itself⁸.

- 1.5 The two processes SA/SEA and HRA can inform each other; and summary HRA findings are incorporated into SA/SEA. The Huntley Neighbourhood Development Plan Group on behalf of the Huntley Parish Council has commissioned independent SA, SEA, HRA specialists Enfusion Ltd to undertake the SEA and HRA screening.

The Forest of Dean Local Plan (FDLP) 2026

- 1.6 The Forest of Dean District Council (FDDC) has prepared a Local Plan⁹ (comprising the Core Strategy adopted 2016 and the Allocations Plan adopted 2018) to guide future development in the Local Authority area during the period up to 2026. In accordance with legislative and policy requirements¹⁰, the Council must carry out a Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) of its Local Plan. The SA/SEA and HRA of the Local Plan was undertaken alongside the preparation of the plan documents with SA/SEA and HRA Reports published as evidence to support at each stage of plan-making.
- 1.7 A neighbourhood plan attains the same legal status as the Local Plan once it has been agreed at a referendum and is adopted or “made” (brought into legal force) by the local planning authority. At this point it becomes part of the statutory development plan. Applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise¹¹.

This SEA & HRA Screening Report

- 1.8 This document provides a screening determination of the need to carry out an SEA and an HRA of the Huntley Neighbourhood Development Plan 2022-2026 (HNNDP Consultation draft July 2022). The Forest of Dean District Council, as the “Responsible Authority”¹² under the SEA Regulations, and the “Competent Authority”¹³ under the HRA Regulations, is responsible for ensuring that this screening process meets with regulatory requirements. The SEA and HRA screening have been undertaken on behalf of the Parish Council and is submitted to the District Council. This Screening Report was sent to the environmental consultation bodies (Environment Agency, Historic England & Natural England) for the statutory 5 weeks consultation period.

⁸ <https://www.gov.uk/guidance/appropriate-assessment>

⁹ [Our current Local Plan - Forest of Dean District Council](#)

¹⁰ Town & Country Planning Regulations (2011, 2012); National Planning Policy Framework (NPPF 2012, revised 2018, updated 2019, revised 2021)

<https://www.gov.uk/government/publications/national-planning-policy-framework--2>

¹¹ PCPA 2004 section 38(6)

¹² The organisation that adopts (“makes”) the neighbourhood plan

¹³ The organisation that ensures that the plan will not have any likely significant effects on the integrity of the designated nature conservation sites

2.0 LEGISLATIVE REQUIREMENTS & GUIDANCE; METHOD

Legislative Requirements

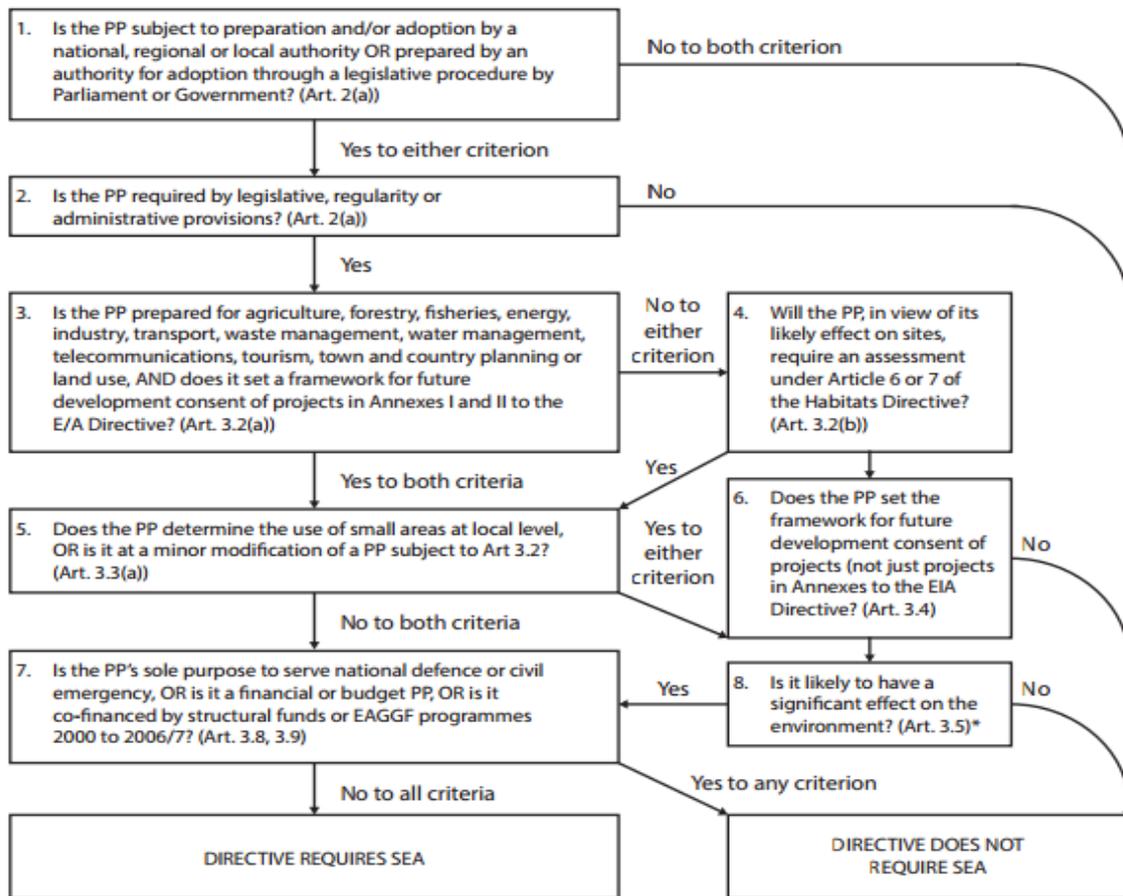
- 2.1 The Localism Act 2011 requires neighbourhood plans to comply with EU legislation. Regulation 5 of the SEA Regulations requires an environmental assessment of plans which:
1. *are prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use (Regulation 5, para. (2)(a), and which set the framework for future development consent of projects listed in Annex I or II to Council Directive 85/337/EEC (EIA Directive) on the assessment of the effects of certain public and private projects on the environment (Regulation 5, para. (2)(b)*
 2. *in view of the likely effect on sites, have been determined to require an assessment pursuant to Article 6 or 7 of the Habitats Directive (92/43/EEC) (Regulation 5, para. (3)*
 3. *set the framework for future development consent of projects¹⁴ (Regulation 5, para. (4)(b)*
 4. *are determined to be likely to have significant environmental effects as determined under regulation 9(1) (Regulation 5, para. (4)(c)*
- 2.2 An environmental assessment need not be carried out for:
- a) *plans which determine the use of a small area¹⁵ at local level (Regulation 5, para. (6)(a); or*
 - b) *plans which are a minor modification¹⁶ to a plan or programme (Regulation 5, para. (6)(b) unless it has been determined under regulation 9(1) that the plan is likely to have significant environmental effects.*
- 2.3 UK Government guidance provides a flow diagram with questions/criteria for the SEA Directive and its application to the plan-making process as follows:

¹⁴ European Commission guidance states that plans and programmes which *set the framework for future development consent of projects* would normally contain 'criteria or conditions which guide the way a consenting authority decides an application for development consent'. *Development consent* is defined in the EIA Directive as "the decision of the competent authority or authorities which entitled the developer to proceed with the project" (Article 1(2) of the EIA Directive).

¹⁵ European Commission guidance suggests that *plans which determine the use of small areas at local level* might include "a building plan which, for a particular, limited area, outlines details of how buildings must be constructed, determining, for example, their height, width or design"

¹⁶ 'Minor modifications' should be considered in the context of the plan or programme which is being modified and of the likelihood of their having significant environmental effects. A modification may be of such small order that it is unlikely to have significant environmental effects.

Figure 2.1: Flow Diagram¹⁷ for Determining if a Plan is likely to have Significant Environmental Effects



Note: The figure is intended as a guide to the criteria for application of the Directive to plans & programmes (PPs); it does not have legal status. Where a Neighbourhood Plan is likely to have a significant effect on the environment, a strategic environmental assessment (SEA) must be carried out and an Environmental Report (ER) prepared.

2.4 There is no legal requirement for a Neighbourhood Plan (NP)¹⁸ to have a Sustainability Appraisal as set out in section 19 of the Planning & Compulsory Purchase Act 2004. Government advises that in some limited circumstances, where a Neighbourhood Plan is likely to have significant environmental effects, it may require a Strategic Environmental Assessment. In order to decide whether a draft NP might have significant environmental effects, it must be screened at an early stage according to the requirements set out in regulation 9 of the SEA Regulations. This includes a requirement to consult with the SEA consultation bodies (in England - Environment Agency, Historic England, Natural England); each body can advise on particular topics relevant to its specific area of expertise and responsibility.

¹⁷ Based on ODPM 2005 - 'A Practical Guide to the SEA Directive' 2005

¹⁸ <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

Guidance on SA/SEA & HRA

- 2.5 The National Planning Policy Framework (NPPF) and Planning Practice Guidance (NPPG) have advised that a Neighbourhood Plan:
- would need SEA “...in limited circumstances...”
 - should be screened early
 - screening should consult with the consultation bodies
 - if ‘screened out’, should have a ‘statement of reasons’ prepared
- 2.6 Whether a Neighbourhood Plan proposal requires a SEA, and (if so) the level of detail needed, will depend on what is proposed. An SEA may be required, for example, where:
- a neighbourhood plan allocates sites for development
 - the neighbourhood area contains sensitive natural or heritage assets that may be affected by the proposals in the plan
 - the neighbourhood plan is likely to have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan.
- 2.7 Government planning guidance further advises that before deciding whether significant environmental effects are likely, the local planning authority should take into account the criteria specified in Schedule 1¹⁹ to the SEA Regulations (2004) and consult the statutory environmental consultation bodies. Schedule 1 sets out the criteria for determining likely significant effects on the environment taking into account the characteristics of plans and the characteristics of the effects and the area likely to be affected. The qualifying body (ie HPC for the HNDP 2026) is required to provide the following – to demonstrate that the basic condition²⁰ in the planning legislation has been met:
- “a statement of reasons for a determination... that the proposal is unlikely to have significant environmental effects; or
 - An environmental report”
- 2.8 Planning practice guidance²¹ also provides advice on HRA screening and the subsequent appropriate assessment stage of the process for neighbourhood planning. An appropriate assessment for a more strategic plan, such as the Local Plan, can consider the impacts on sites and confirm the suitability or likely success of mitigation measures for associated non-strategic policies and projects. An individual assessment of non-strategic policies and projects may not be necessary in some limited cases where the strategic appropriate assessment is sufficiently robust. This needs to contain conclusions capable of

¹⁹ <http://www.legislation.gov.uk/uksi/2004/1633/schedule/1/made>

²⁰ A Neighbourhood Plan should not breach, and must be compatible with, European Union obligations in order for it to be legally compliant.

²¹ <https://www.gov.uk/guidance/appropriate-assessment>

removing all reasonable scientific doubt on the impacts of non-strategic policies, such as in neighbourhood plans.

Method

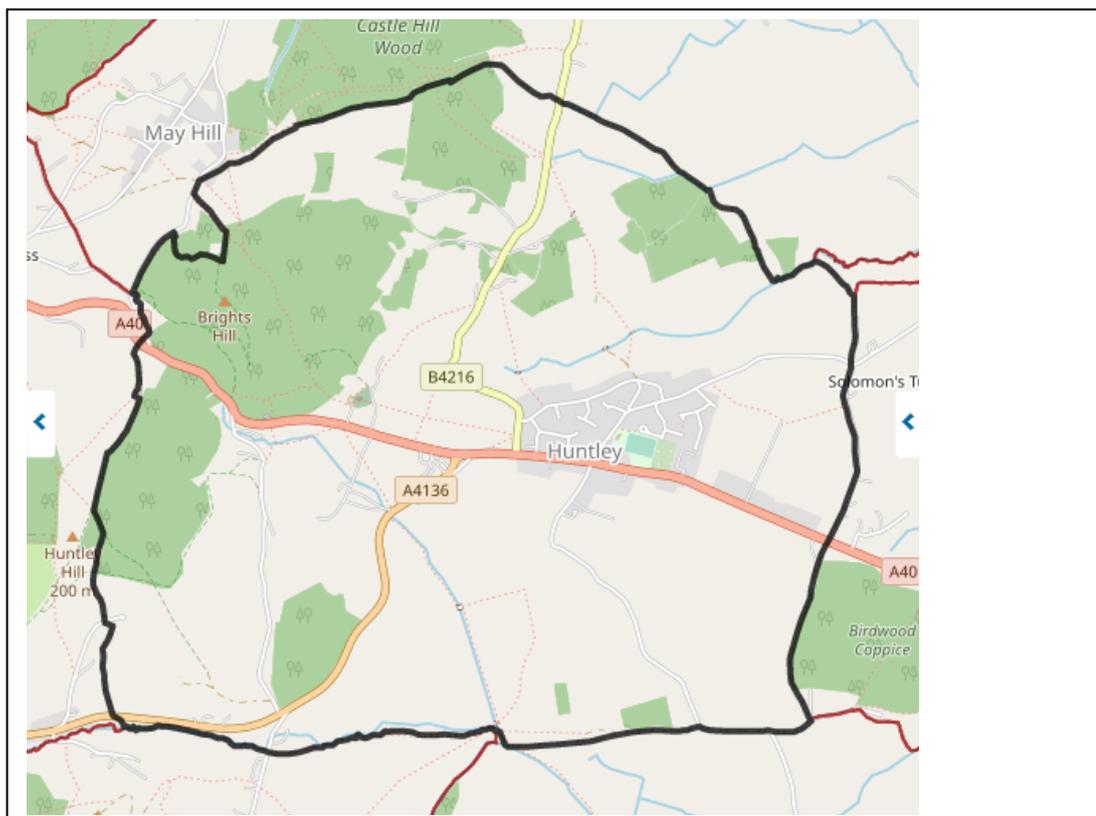
- 2.9 In order to be able to decide whether a SEA will be required, it is necessary to know about the policies and proposals in the Neighbourhood Plan, and in particular, as follows:
- how they might affect the environment, community, or economy
 - whether they propose a higher level of development than is already identified in FDLP planning policies
 - whether any of the proposals are likely to affect a "sensitive area", such as a Site of special Scientific Interest (SSSI) or designated European Site for nature conservation (Special Area of Conservation SAC, Special Protection Area SPA)
 - whether implementation of policies in the plan might lead to new development in the future
 - whether the cumulative impact of the policies and proposals when assessed together may give rise to a likely significant effect, for example, several relatively small housing proposals may have cumulative significant effects on a nearby important wildlife habitat
- 2.10 Available information from Defra MAGIC maps, Environment Agency flood risk maps, the Council's evidence base for the FDDC Local Plan, and the evidence base for the HNBP, together with professional judgment, was used to identify the sensitivity of the Huntley area environment and whether significant effects are likely that have not been previously assessed through SA, such that an SEA would be required, and whether an HRA/Appropriate Assessment is necessary.

3.0 THE HUNTLEY NEIGHBOURHOOD DEVELOPMENT PLAN 2026 (HNDP)

Context

- 3.1 The Huntley Parish Council (HPC)²² is the qualifying body designated for the purpose of preparing the HNDP. The Neighbourhood Plan Steering Group is comprised of Parish Councillors and local residents. The Steering Group has sought the views of the wider community through the process of preparing the draft HNDP with public consultation events and the creation of the NDP website²³ with process progress and a document library reporting the minutes of meetings, formal updates for the HPC, the evidence base, and details of all engagement and consultations.
- 3.2 Huntley Parish was formally designated²⁴ as a Neighbourhood Area by the Forest of Dean District Council²⁵ on 7 June and 21 September 2021 and the boundary is shown in the figure following:

Figure 3.1: Boundary²⁶ for the Area Designation of the Huntley NDP Area



²² <https://huntleypc.weebly.com/>

²³ <https://www.huntley-ndp.org/>

²⁴ Localism Act 2011

²⁵ <https://www.fdean.gov.uk/planning-and-building/planning-policy/neighbourhood-planning/neighbourhood-plans-in-development/>

²⁶ As shown in the draft NDP - source Gloucestershire County Council

- 3.3 The HNBP must be in general conformity with the strategic policies set out in the Forest of Dean Local Plan 2026²⁷. The FDLP identifies Huntley as a service village such that new housing and employment opportunities are likely to be small in scale (except for possible affordable housing) – as set out in CSP 16. The Site Allocations Plan includes one allocation AP 87 for Land adjacent the Poplars, Huntley for up to 12 dwellings and associated open space on land off Tibberton Lane.
- 3.4 This Report sets out the screening assessments and decisions to demonstrate that due processes have been followed in line with regulatory requirements.

The draft Huntley NDP 2026 (July 2022)

- 3.5 Huntley is a small rural parish lying under May Hill approximately 8 miles west of Gloucester and 5 miles south of Newent. The Huntley Brook runs through the parish and the Ley Brook runs to the south of the parish area. The village is surrounded by gentle sloping fields and orchards that provide an attractive setting. The population is around 1,100 with a higher proportion of over 65 year olds than Gloucestershire. Local employment was traditionally woodland management and pastoral farming, together with apple and pear orchards. Agriculture remains the key focus of employment.
- 3.6 Huntley was mentioned in the Domesday book and has a range of heritage assets. The parish area is crossed by numerous rights of way giving access to for local use and to the open green spaces. There are several areas of ancient and semi-natural woodland within Huntley and including some veteran trees. The area supports a range of habitats and species including some on national priority lists – for example, Curlew, Lapwing. Nationally protected Bat species thrive in the area as the network of caves, disused mines and old buildings provide substantial roosting opportunities, and the rural wooded landscape provides high quality and well-connected foraging habitat.
- 3.7 The overall Vision for the HNBP is that “*Huntley will continue to be an attractive village with a strong historic character, an unspoilt rural setting and a range of high-quality homes fulfilling local needs, together with the infrastructure, public services and community facilities required to support this growth. Development will occur with the minimum of intrusion on the existing surrounding green space resulting in a healthy, safe and pleasant environment for its residents to live, learn, work and play in.*”
- 3.8 The HNBP contains 8 strategic aims for Huntley based on the main issues that the Parish faces. Each strategic aim has a corresponding set of objectives, supplemented with a policy framework to guide the development necessary to deliver it. The aims, objectives, and NDP Policies relate to topics, set out as follows:

²⁷ <https://www.fdean.gov.uk/planning-and-building/planning-policy/our-current-local-plan/>

- Housing Mix and Need – Policies HM1; HM2
- Built Environment – Policies BE1, BE2, BE3
- Community Infrastructure – Policies C1, C2, C3
- Natural Environment – Policies NE1 NE2, NE3
- Transport and Travel – Policy TT1
- Economy – Policies E1-E5
- Tourism – Policies TM1-2

3.9 The HNDP is supported by Appendices A-L that provide details on consultation and the evidence base.

4.0 SEA SCREENING ASSESSMENT

4.1 It is considered that the Huntley Neighbourhood Development Plan (HNDP) 2026 is within the scope of the SEA Regulations since it is a plan that:

- is subject to preparation or adoption by an authority at national, regional or local level (Regulation 2)
- is prepared for town and country planning or land use and it is a plan that sets the framework for future development consent of projects generally (Regulation 5, para. 4)
- will apply to a wider area other than a small area at local level and is not a minor modification to an existing plan or programme (Regulation 5, para. 6).

A determination under Regulation 9 is therefore required as to whether HNDP 2026 is likely to have significant effects on the environment.

4.2 The screening requirements set out in Regulation 9 and Schedule 1 of the SEA Regulations include two sets of characteristics for determining the likely significance of effects on the environment:

- the characteristics of the plan itself and
- the characteristics of the effects and of the area likely to be affected by the plan

Therefore, this screening assessment is structured in the following table according to the criteria specified in Schedule 1 of the Regulations:

Table 4.1: Screening Assessment of the draft HNDP 2026 (Regulation 14 Consultation Draft July 2022)

Criteria (Schedule 1 SEA Regulations)	Are significant environmental effects likely? Yes/ No	
Justification and evidence		
1.The characteristics of plans, having regard, in particular, to:		
(a) the degree to which the plan sets a framework for projects and other activities, either with regard to the location, nature, size and operating	No	The NDP does not set a programme or framework for large scale projects. The plan is consistent with the district Local Plan (which was subject to SA/SEA during its preparation) and therefore, does not set an additional framework. The NDP does not propose allocation of sites for development projects.

Criteria (Schedule 1 SEA Regulations)	Are significant environmental effects likely? Yes/ No	
	Justification and evidence	
conditions or by allocating resources		
(b) the degree to which the plan influences other plans and programmes including those in a hierarchy	No	The NDP is prepared by the local community to influence development at the parish level. It does not strongly influence strategic plans higher up in the spatial planning hierarchy, although the District Council does need to consider the proposals in the NDP during preparation of the Local Plan. The NDP is considered to be supportive and interpretive rather than instructive in its influence.
(c) the relevance of the plan for the integration of environmental considerations in particular with a view to promoting sustainable development	No	The NP is a spatial/land-use plan that seeks to promote the objectives of sustainable development and it is developed within the framework for sustainable development as set out in the NPPF. The NDP provides supporting local policies in regard to housing, built environment, community infrastructure, natural environment, transport, economy and tourism. It is not specifically relevant as a plan for integrating environmental considerations. Any development proposed must be in accordance with the environmental protection policies in the adopted FDLP and the NPPF.
(d) environmental problems relevant to the plan	No	There are no specific significant environmental problems relevant to this plan that have not been identified and assessed through the higher-level Local Plan and its accompanying SA/SEA. The plan seeks to protect and enhance the local environment with regard to landscape and biodiversity; it seeks to address localised issues for flooding in the west of the Parish.
(e) the relevance of the plan for the implementation of Community legislation on the environment (for example, plans and programmes linked to waste management or water protection).	No	The NP is not relevant as a plan for implementing community legislation.
2.Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:		
(a) the probability, duration, frequency and reversibility of the effects	No	This has been tested through SA/SEA at the Local Plan level & with strong mitigation measures through LP policies, the SA/SEA concluded that there will be no significant residual negative environmental effects. The HNPP does not propose allocation of sites for development projects. The potential for effects from the NDP is restricted by the small-scale nature of proposals and overall policy requirements.

Criteria (Schedule 1 SEA Regulations)	Are significant environmental effects likely? Yes/ No	
	Justification and evidence	
(b) the cumulative nature of the effects	No	As above in 2(a) – the HNDP does not contribute additionally to the factors already identified as part of the development plan.
(c) the transboundary nature of the effects	No	No significant transboundary effects are likely from the proposals.
(d) the risks to human health or the environment (for example, due to accidents)	No	No significant negative environmental effects are considered likely to risk human health or the environment.
(e) the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);	No	The HNDP does not propose allocation of sites for development projects. The geographical size of the plan area is small, and the size of the population is relatively small. Therefore, no likely significant environmental effects.
(f) the value and vulnerability of the area likely to be affected due to— (i) special natural characteristics or cultural heritage; (ii) exceeded environmental quality standards or limit values; or (iii) intensive land-use;	No	As above. No likely significant negative effects on locally important characteristics – the HNDP does not propose allocation of sites for development projects; it seeks to protect and enhance the natural environment. The HNDP is not within any area that has exceeded environmental quality standards, for example, it is not within an Air Quality Management Area (AQMA). ²⁸ The limited spatial extent and small-scale of the plan indicates limited intensification of land use
(g) the effects on areas or landscapes which have a recognised national, Community or international protection status.	No	The HNDP area does not include (nor nearby) any sites/areas designated for their international or national significance with regard to landscape and Scheduled Monuments ²⁹ ; there are 22 Grade II Listed Buildings ³⁰ . The internationally protected habitats of the Wye Valley & Forest of Dean Bat Sites (Special Area of Conservation SAC) are located approximately 6.5 km to the west and 6.5/17.5 km south-west of the Parish. The Walmore Common Special Protection Area SPA/Ramsar site is located approximately 4.5 km to the south-east of the Parish. The Severn Estuary SAC/SPA/Ramsar is located approximately 11.4 km to the south. Most are also nationally protected SSSIs. (Distances measured to nearest boundary edge using Magic graphics). The HRA screening process determined that the HDNP does not itself promote areas, locations, or quanta of development; it sets out policies for evaluating the acceptability of proposals. Therefore, the NDP's policies were screened out & there was no requirement identified for appropriate assessment.

²⁸ https://uk-air.defra.gov.uk/aqma/local-authorities?la_id=106

²⁹ <https://magic.defra.gov.uk/magicmap.aspx>

³⁰ Appendix E draft HNDP (July 2022)

Criteria (Schedule 1 SEA Regulations)	Are significant environmental effects likely? Yes/ No Justification and evidence	
		<p>Overall, it is considered that the plan, the FDLP and the NPPF provide sufficient protection for these internationally designated sites.</p> <p>Nationally protected species known to be found in the Huntley Parish area include Lesser & Greater Horseshoe Bats.</p>

5.0 SEA SCREENING DECISION

- 5.1 Regulation 9 of the SEA Regulations requires that the responsible authority shall determine whether or not a plan is likely to have significant environmental effects. The responsible authority shall:
- (a) take into account the criteria specified in Schedule 1 to these Regulations, and
 - (b) consult the consultation bodies
- 5.2 Where the responsible authority determines that the plan is unlikely to have significant environmental effects (and, accordingly, does not require an environmental assessment), it shall prepare a statement of its reasons for the determination.
- 5.3 It is considered that the draft Huntley Neighbourhood Development Plan (HNDP to 2026, July 2022) is unlikely to have significant environmental effects and thus does not require a Strategic Environmental Assessment (SEA). This decision is made for the following key reasons:
- The geographical extent of the HNDP is limited and the policies are small-scale such that effects will not be significant
 - Most HNDP policies aim to restrict the extent of development as well as protecting environmental factors
 - The HNDP does not propose any areas, sites, or quanta for development; its policies aim to evaluate the acceptability of proposals
 - The HNDP is generally supportive and interpretive; the HNDP in combination with the FDLP contains environmental protection, mitigation, and enhancement requirements
 - Likely significant effects have been previously assessed through SA incorporating SEA of the FDLP and therefore, further SEA of the HNDP is not required.
 - There will not be any adverse effects on the integrity of European/international sites designated for nature conservation due to the limited size and extent of any likely development in Huntley and the distance from and/or absence of identified environmental pathways to any designated sites. There is no requirement identified for appropriate assessment.

6.0 HABITATS REGULATIONS ASSESSMENT (HRA) SCREENING

European/Internationally Designated Sites for Nature Conservation

6.1 The HNDDP does influence decision-makers on the outcome of applications for project consents, and it does contain policies that could affect one or more European/international sites designated for nature conservation. Therefore, it does need to be subject to HRA. It is considered that there are five European/internationally designated sites³¹ for nature conservation that the draft HNDDP needs to be screened for Likely Significant Effects (LSEs) and any requirement for subsequent appropriate assessment (AA), as follows:

- The Wye Valley & Forest of Dean Bat Sites Special Area of Conservation (SAC) are located approximately 6.5 km to the west and 6.5/17.5 km south-west of the Parish
- The Walmore Common Special Protection Area (SPA)/Ramsar site is located approximately 4.5 km to the south-east of the Parish
- The Severn Estuary SAC/SPA/Ramsar is located approximately 11.4 km to the south of the Parish
- The Wye Valley Woodlands SAC is located approximately 16.7 km to the south-west of the Parish
- The Cotswold Beechwoods SAC located approximately 17.1 km to the south-east of the Parish and beyond the Gloucester conurbation

The characteristics, key vulnerabilities, and conservation objectives of the designated sites are summarised³², as follows:

6.2 **Wye Valley & Forest of Dean Bat Sites SAC:** Deciduous woodland, villages, roads and industrial areas – the site is composed of buildings in everyday use used by bats for breeding and a series of mines used by bats for hibernation. Within the roost the bats are vulnerable to disturbance at critical times, structural alteration, and changes in ventilation. The bats also depend on features outside the designated sites including intermediate roost, foraging grounds, and hedgerows/tree belts that the bats use as commuting routes. Impacts on these features can also affect the integrity of the designated site.

6.3 The primary reason for selection of the site is the presence of Annex II species Lesser Horseshoe Bat (LHB) *Rhinolophus hipposideros* and Greater Horseshoe Bat (GHB) *Rhinolophus ferrumequinum*. This complex of sites on the border of England and Wales contains the greatest concentration 26% of the UK

³¹ Distances measured using Magic Map (Defra) application <https://magic.defra.gov.uk/magicmap.aspx>

³² Data from JNCC <https://jncc.gov.uk/our-work/special-areas-of-conservation-overview/> and Natural England <http://publications.naturalengland.org.uk/publication/>

population of LHB and was selected due to the exceptional breeding population. The GHB population represents about 6% of the UK population. Conservation Objectives aim to avoid the deterioration of the qualifying natural habitats and the habitats of qualifying species, ensuring the integrity of the site is maintained. This relates to both roosting and foraging habitat – condition, security, access, and disturbance.

- 6.4 **Walmore Common Special Protection Area (SPA)/Ramsar:** A low-lying basin in the Severn Vale adjacent to the River Severn, that is subject to extensive winter flooding and high, artificially maintained water levels in summer. The site supports a range of unimproved and improved wet grasslands overlying a large area of peat and is of botanical and ornithological importance. There is also a large network of ditches that has an important hydrological function as well as supporting a diverse community of flora and fauna. The Common is part of a wider important refuge and feeding area for wildfowl. The site qualifies by supporting internationally important numbers of Bewick's Swan *Cygnus columbianus bewickii*. Conservation Objectives aim to prevent deterioration of the habitats and significant disturbance of the qualifying features.
- 6.5 **Severn Estuary SAC/SPA/Ramsar:** A large estuary with extensive intertidal mudflats and sandflats, rocky platforms and islands. Salt marsh fringes the coast backed by ditches and occasional brackish ditches. The seabed is rock and gravel with subtidal sandbanks. The estuary's classic funnel shape, unique in the UK, is a factor causing the Severn to have the second- highest tidal range in the world. Qualifying features: The Severn Estuary SAC hosts the following habitats: estuaries, mudflats and sandflats not covered by seawater at low tide, Atlantic salt meadows (*GlaucoPuccinellietalia maritima*), sandbanks which are slightly covered by sea water all the time, and reefs. The site also supports sea lamprey (*Petromyzon marinus*), river lamprey (*Lampetra fluviatilis*) and twaite shad (*Alosa fallax*). The Severn Estuary SPA supports overwintering Bewick's swan (*Cygnus columbianus bewickii*); on passage ringed plover (*Charadrius hiaticula*) and overwintering curlew (*Numenius arquata*), dunlin (*Calidris alpina alpina*), pintail (*Anas acuta*), redshank (*Tringa tetanus*), and shelduck (*Tadorna tadorna*). It also regularly supports at least 20,000 waterfowl.
- 6.6 The three key activities that may cause the greatest impact on the designated features within this site include paddle sports, powered flying and 'other' (dog walking). There is recent growing awareness of the potential for recreational pressures to impact on the Severn Estuary SAC/SPA/Ramsar site, particularly on the bird populations for which the SPA and Ramsar site are designated and including with regard to functionally linked habitat. The River Severn is functionally linked to the designated site of the estuary and it is approximately 4.5km to the south-east of Huntley, with the estuary itself about 7.5km to the south.
- 6.7 **Wye Valley Woodlands SAC:** Predominantly broad-leaved deciduous woodland (87%) and a significant proportion of the SAC is already positively managed by a group of woodland/environmental organisations, including

Natural England. Annex I habitats that are the primary reason for selection of this site are Beech forests *Asperulo-Fagetum*, considered to be one of the best areas in the UK. Such a variety of woodland types is rare within the UK. In places lime *Tilia* sp., elm *Ulmus* sp. and oak *Quercus* sp. share dominance with the beech. Structurally the woods include old coppice, pollards and high forest types. *Tilio-Acerion* forests of slopes, screes and ravines. The woods of the lower Wye Valley on the border of south Wales and England form one of the most important areas for woodland conservation in the UK. A wide range of ecological variation is associated with slope, aspect and landform. The woodland occurs here as a mosaic with other types, including beech *Fagus sylvatica* and pedunculate oak *Quercus robur* stands. Uncommon trees, including large-leaved lime *Tilia platyphyllos* and rare whitebeams such as *Sorbus porrigentiformis* and *S. rupicola* are found here, as well as locally uncommon herbs, including wood barley *Hordelymus europaeus*, stinking hellebore *Helleborus foetidus*. Also, *Taxus baccata* woods and the Wye Valley is representative of yew *Taxus baccata* woods in the south-west of the habitat's range. Annex II species present as a qualifying feature, but not a primary reason for site selection: Lesser horseshoe bat *Rhinolophus hipposideros*: for which the area is considered to support a significant presence.

- 6.8 The Conservation Objectives for this site are, subject to natural change, to maintain Broadleaved, mixed and yew woodland habitats and geological features in favourable condition (or restored to favourable condition if features are judged to be unfavourable). In particular, to maintain the Broadleaved, mixed, and yew woodland habitat in favourable condition; and to maintain the hibernating population of Horseshoe Bats in favourable condition.
- 6.9 **Cotswold Beechwoods SAC:** The Cotswold Beechwoods represent the most westerly extensive blocks of *Asperulo-Fagetum* beech forests in the UK. The woods are floristically richer than the Chilterns, and rare plants include red helleborine *Cephalanthera rubra*, stinking hellebore *Helleborus foetidus*, narrow-lipped helleborine *Epipactis leptochila* and wood barley *Hordelymus europaeus*. There is a rich mollusc fauna. The woods are structurally varied, including blocks of high forest and some areas of remnant beech coppice. The Annex I habitats that are the primary reason for selection of this site are *Asperulo-Fagetum* beech forests.
- 6.10 Key threats to the Cotswold Beechwood SAC for recreational pressures and air pollution from traffic were identified during studies associated with the preparation of new development plans with significant housing growth for Gloucester, Cheltenham, Tewkesbury, Cotswold, and Stroud. A collaborative approach was required to address adverse impacts – alone and in-combination. A long-term Strategy (2022)³³ for mitigating LSEs has been developed and agreed. The Strategy applies to a zone of influence of 15.4 km from the SAC. Huntley in the Forest of Dean DC area is beyond this

³³ For Stroud DC, Cheltenham BC, Cotswold DC, Gloucester CC, Stroud DC, Tewkesbury DC – Liley D & Panter C 2022. Cotswold Beechwoods SAC Recreation Mitigation Strategy. Report by Footprint Ecology.

identified zone of influence – the centre of the Parish area is approximately 16.5 km measured directly from the nearest boundary of the SAC.

Screening of NDP Policies

- 6.11 The HNDP policies were investigated as to whether they could potentially result in likely significant effects (LSEs) on a European designated nature conservation site either alone or in combination with other plans and policies. Assessment was made considering the likely implications/outcomes that might arise from implementation of the HNDP policies and having regard to the conservation objectives for the European sites and the precautionary principle. It is appreciated that the plan is at the draft Regulation 14 stage and may be subject to further revision after consultation. However, it is understood that the overall policy objectives and content are not expected to substantially change.
- 6.12 The screening of the HNDP Policies for LSEs is set out in the table 6.1, as follows:

Table 6.1: Screening of HNDP Policies for LSEs

HNDP Policies	Screening Assessment Commentary	Screened In/out
Housing		
HM1 New Housing within the Settlement Boundary	Small-scale housing will be supported where it meets certain requirements on type, size & location of site, & with particular aim to contribute to affordable housing needs. It does not promote areas, locations, or quanta of development.	Out
HM2 New Housing outside the Settlement Boundary	New housing will not be supported outside the settlement boundary.	Out
Built Environment		
BE1 Historic Environment & Non-designated Assets	New development is required to protect & conserve the historic environment. The policy does not promote areas, locations, or quanta of development.	Out
BE2 Building Design	Policy supports new and re-developments that present high-quality & inclusive design that conserves local distinctiveness.	Out
Community Infrastructure		
C1 Community Facilities	Policy supports enhancement & new provision of community facilities; it does not support any loss or significant diminution. It does not promote areas, locations, or quanta of development.	Out

C2 New Community & Recreational Facilities	New facilities will be supported subject to certain requirements regarding character, identified need, amenity, and car parking. The policy does not promote areas, locations, or quanta of development.	Out
C3 Green Space	Policy aims to protect identified Green Spaces; it does not promote areas, locations, or quanta of development.	Out
Natural Environment		
NE1 Protecting & Enhancing the Natural Environment	New development must protect, conserve and where possible enhance the natural environment. The policy does not promote areas, locations, or quanta of development.	Out
NE2 Protecting Wildlife & Securing Biodiversity Net Gain	All new development should demonstrate how it will protect & enhance wildlife and create a measurable net gain in biodiversity. The policy does not promote areas, locations, or quanta of development.	Out
NE3 Dark Skies	Policy seeks to minimise light pollution; it does not promote areas, locations, or quanta of development.	Out
Transport & Travel		
TE1 Sustainable Transport & Travel	The Policy does not support new development that would exacerbate existing transport issues; it supports new development that has adequate car parking, provides walking & cycling links, & protects PROWs.	Out
Economy		
E1 Small-Scale Local Employment Development	New local employment development is supported where it meets certain requirements such as size, location & accessibility. The policy does not promote areas, locations, or quanta of development.	Out
E2 Agricultural Development	New agricultural development should demonstrate that it meets certain requirements, including associated with accessibility, amenity, drainage, landscape, & PROWs. The policy does not promote areas, locations, or quanta of development.	Out
E3 Protecting Local Employment	Proposals for change of use or redevelopment will only be supported under certain circumstances associated with identified need, or resolution of any environmental problems. The policy does	Out

	not promote areas, locations, or quanta of development.	
E4 Promoting High Speed Broadband & Mobile Telecommunications	New & improved infrastructure will be supported provided it meets with certain requirements that seek to minimise any adverse effects. The policy does not promote areas, locations, or quanta of development.	Out
E5 Home Working & Live-Work Units	New dwellings or extensions that facilitate homeworking will be supported where they meet certain requirements associated with accessibility & amenity. The policy does not promote areas, locations, or quanta of development.	Out

- 6.13 In consideration of the small geographical area of the HNDP, its distance from European sites outside the Huntley Parish boundary, and that the HNDP does not allocate sites for new development, this HRA screening considers that the HNDP is not likely to have significant effects on European/internationally designated sites, either alone or in combination with other plans and projects.
- 6.14 The HNDP does not allocate any sites or quanta for development such that increases in population are limited. Therefore, potential effects on bat roosts and foraging habitats are limited due to the small-scale and limited new development supported by the plan; potential increases in recreational activities associated with the Severn SPA/SAC/Ramsar are unlikely and not significant. Huntley is located beyond the zone of influence for potential recreational effects on the Cotswold Beechwoods SAC.
- 6.15 The HNDP contains policies for assessing the acceptability of proposed development. There will not be any adverse effects on the integrity of designated sites due to the limited size and extent of any likely development in Huntley and the distance from and/or absence of identified environmental pathways to any sites. The HRA of the Local Plan remains valid and there is no new material and relevant information associated with Huntley that should be considered.

7.0 STATUTORY SCREENING CONSULTATION & OVERALL CONCLUSION

Statutory Screening Consultation

- 7.1 This Screening Report was sent to the environmental bodies for the formal 5 weeks consultation (10 October to 21 November 2022) to demonstrate that due processes have been undertaken to screen the draft Huntley Neighbourhood Development Plan 2026 (July 2022) with regard to HRA and SEA. The statutory environmental consultees (Environment Agency, Historic England, Natural England) have advised that they agree with the conclusions that a full SEA is not required and with the HRA screening determination that appropriate assessment is not required.
- 7.2 Therefore, it is confirmed that the draft Huntley Neighbourhood Development Plan (HNDP to 2026, July 2022) is unlikely to have significant environmental effects and thus does not require a Strategic Environmental Assessment (SEA). HRA screening considers that the HNDP is not likely to have significant effects on European/internationally designated sites, either alone or in combination with other plans and projects.