

Submission
Appendix U
*Strategic
environmental
assessment*





Strategic Environmental Assessment (SEA) Screening Report

for the

Coleford Neighbourhood Development Plan

Undertaken by Forest of Dean District Council

Submission Draft – February 2018

The logo for Forest of Dean District Council, featuring a stylized green tree and a blue stream, with the text "Forest of Dean" and "DISTRICT COUNCIL" below.	Version Submission Version (February 2018) Assessment Version 1.2	Assessor: AC	Reviewer:
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Summary

The assessment considers the Coleford Neighbourhood Development Plan for the period up to 2026 (C-NDP) and is a plan to which the Environmental Assessment of Plans and Programmes Regulations 2004 applies.

Following the assessment (tables 1 -3) the Forest of District Council has concluded that the C-NDP, will not result in significant environmental effects.

Therefore an Environmental Assessment is currently not required for the C-NDP

It has been concluded that:

- i. The geographic spread of the NDP is limited
- ii. The locations, scale and effects of the NDP are very limited
- iii. The NDP does not create a significant new framework or programme in addition to the existing Core Strategy, Allocations Plan, Saved Local Plan or Local Transport Plan.
- iv. The NDP is generally supportive and interpretive rather than instructive.
- v. The NDP in combination with the Core Strategy and Allocations Plan contains environmental mitigation and 'cancelation' factors

The three statutory bodies (for the purposes of SEA Screening, English Heritage, the Environment Agency and Natural England) were consulted on draft assessment in summer 2017. No objections to the conclusions of the assessment, screening the NDP of out of requirements for SEA, were raised.

Limitations

An objective assessment has been undertaken by the Forest of Dean District Council, the Local Planning Authority and is based on local knowledge and understanding of the area.

The copy of the plan used to complete the assessment was dated 21st February 2018 following earlier assessments in December 2017 and response to revisions document (NDP 15-11-17). It has been considered that supporting text provided the context and ambition for policies and therefore was used to qualify the intended effects of the plan.

General consideration of the appropriateness or otherwise of the plan objectives or policies contained within the NDP has not been a considered as part of this assessment.

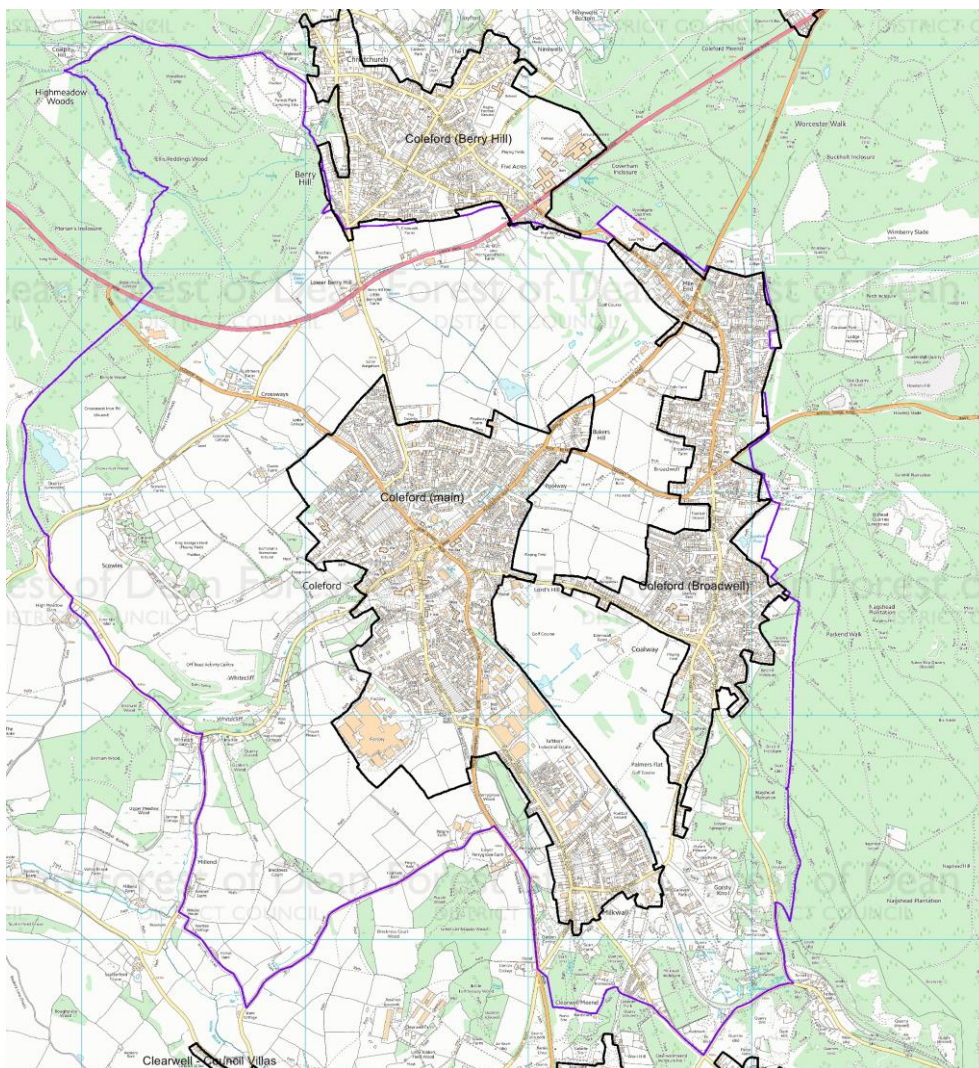
1.0 Introduction

1.1 This screening report is designed to determine whether or not the contents of the C-NDP, hereafter referred to as the NDP or plan, requires a Strategic Environmental Assessment (SEA) in accordance with the European Directive 2001/42/EC and associated Environmental Assessment of Plans and Programmes Regulations 2004.

1.2 NDP's can establish general or detailed planning policies for development and use of land in a local area (neighbourhood). NDP's must take account of higher plans such as those developed by District or County Councils.

1.3 When adopted an NDP forms part of the Development Plan for the area. An NDP is an influencing document in planning decisions and wider strategies/decisions.

Figure 1 NDP Area



1.4 When adopted NDP's form part of the development plan and will be used in considering planning applications along with other relevant planning policy documents and other material planning considerations.

1.5 The NDP sets out the vision for the plan area:

“The Vision for Coleford by 2026:

Coleford Parish will be valued by its residents as a friendly, easily accessible market town, at the hub of a cluster of thriving and diverse settlements within a wider Forest community. Future development will sustain the needs of the community and also conserve the close relationship with the countryside that forms a green ring between the town and the surrounding settlements.

The town centre will have a range of interesting shops which provide local and regionally produced foods, goods and gifts for residents and visitors. There will be attractive gateways to the town and comfortable green places to sit and relax, surrounded by the well conserved natural and built heritage.

There will be a range of educational, leisure and employment opportunities available within and closer to the parish. All these, and the health and social support services will be easily accessed through good transport infrastructure and communication networks.

Visitors of all ages will remember their enjoyable experience of a wide range of interesting tourist events and heritage trails around the town and surrounding countryside”

1.6 The plan contains 24 policies set within a framework of seven identified key areas; Town Centre, Economy, Housing, Community Facilities, Historic Environment, Natural Environment; and Transport.

1.7 The plan covers a period up to 2026, however it acknowledged that that periods of review will be required through this epoch.

1.8 The legislative background set out below outlines the regulations that require the need for this screening exercise. Section 4 provides a screening assessment of the likely significant environmental effects of the NDP and examines the need for a SEA.

2.0 Legislative Background

2.1 The requirement for a Strategic Environmental Assessment (SEA) stems from the European Directive 2001/42/EC “on the assessment of the effects of certain plans and programmes on the environment” (SEA Directive). This Directive was transposed in UK law by The Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations). This legislation places an obligation to undertake a SEA on any plan or programme prepared for town and country planning or land use purposes and which sets

the framework for future development consent of certain projects. Guidance on the SEA process is provided in “A Practical Guide to the Strategic Environmental Assessment Directive (ODPM et al, 2005).

2.2 Under Article 3(3) and 3(4) of the SEA Directive, SEA is required for plans and programmes which “determine the use of small areas at a local level” or which only propose “minor modifications to plans and programmes”, and which would otherwise require SEA, only where they are determined to be likely to have significant environmental effects.

This screening opinion has been prepared by Forest of Dean District Council to ascertain whether or not a ‘full’ Strategic Environmental Assessment is required. This is to ensure that the NDP is in accordance with Regulations 5 and 9 of the Environmental Assessment of Plans and Programmes Regulations 2004 and to meet the ‘Basic Conditions’ for Neighbourhood Development Plans set out in the Town and Country Planning Act 1990 (amended).

3.0 Screening for SEA

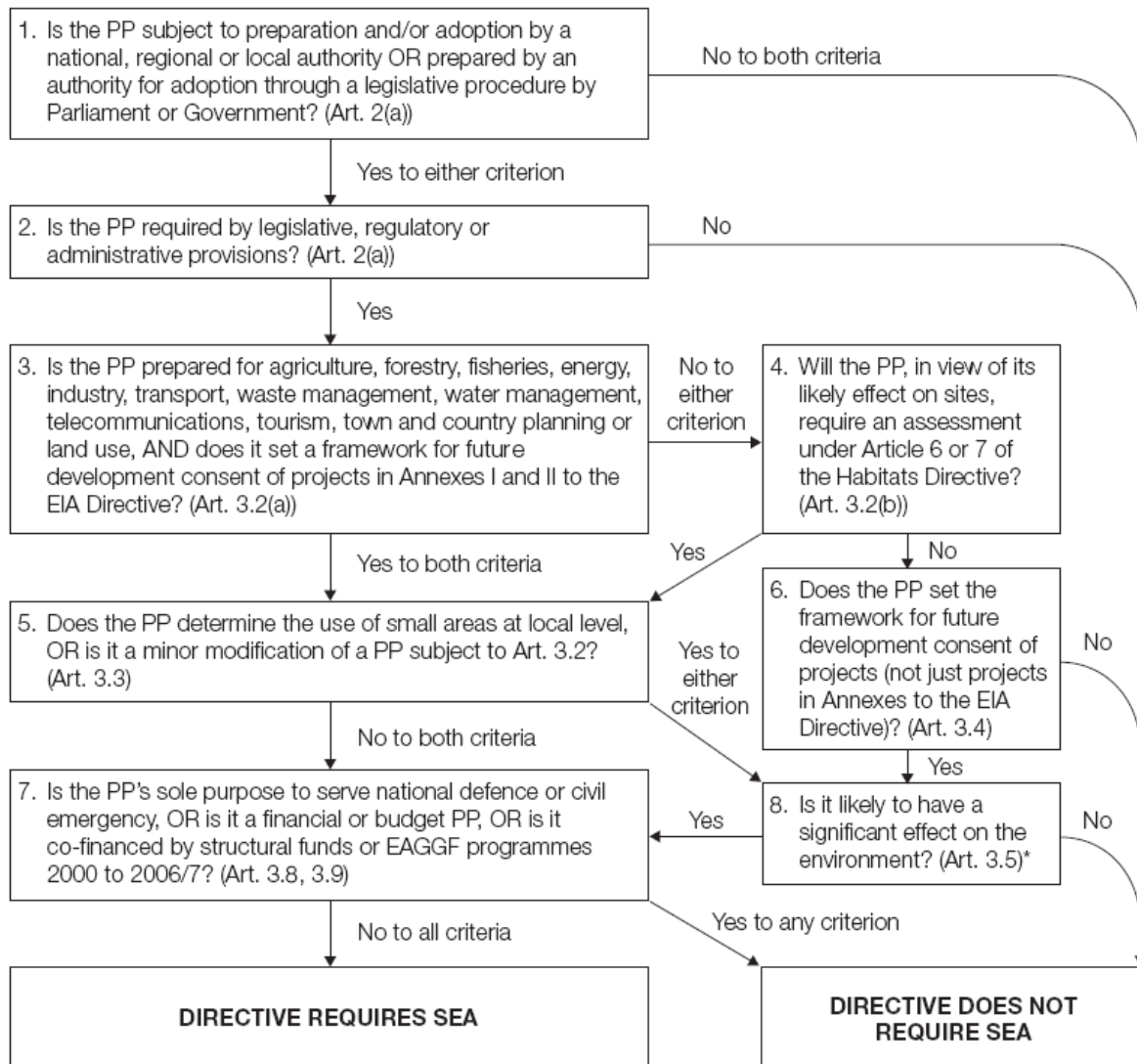
3.1 The screening process is based upon consideration of criteria to determine whether the plan is likely to have “significant environmental effects”, this is known as ‘screening’. The three “consultation bodies” (Natural England, English Heritage and the Environment Agency) were be consulted on the outcome of the draft screening. In accordance with Regulation 9 of the SEA Regulations, only after these bodies have been consulted will the local planning authority confirm whether SEA will be required.

3.2 The ODPM publication A Practical Guide to the Strategic Environmental Assessment Directive (ODPM et al, 2005) provides a checklist approach based on the SEA Regulations to help determine whether SEA is required. This has been used as the basis for this assessment and is set out below.

3.3 Figure 2 below illustrates the process for screening a planning document to ascertain whether a plan or project (PP) is one to which SEA should apply. If the PP is one to which SEA applies the screening assessment will consider if the plan is likely to have significant environmental effects and therefore an environmental assessment must be undertaken.

Figure 2 – Application of the SEA Directive to plans and programmes

This diagram is intended as a guide to the criteria for application of the Directive to plans and programmes (PPs). It has no legal status.



*The Directive requires Member States to determine whether plans or programmes in this category are likely to have significant environmental effects. These determinations may be made on a case by case basis and/or by specifying types of plan or programme.

Source: A Practical Guide to the Strategic Environmental Assessment Directive (Accessed 06.04.2017: <https://www.gov.uk/government/publications/strategic-environmental-assessment-directive-guidance>)

4.0 Assessment

4.1 Table 1 below considers whether the NDP is a plan or project to which SEA should apply. The questions below are drawn from and should be read in conjunction with Figure 2 above.

Table 1: Establishing the Need for SEA		
Stage	Y/N	Reason
1. Is the PP (plan or programme) subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority for adoption through a legislative procedure by Parliament or Government? (Art. 2(a))	Y	The NDP is adopted through a legislative procedure and supports the implementation of the Local Development Framework / Local Plan.
2. Is the PP required by legislative, regulatory or administrative provisions? (Art. 2(a))	Y	Where one is undertaken it is controlled by regulatory and legislative provisions. It is required to be taken account of in relation to other PP's.
3. (a) Is the PP prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use, AND (b) does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive? (Both parts of this criterion (a & b) need to be answered 'yes' for SEA to apply. Art 3.2(a))	N	The NDP is for Town and Country Planning purposes (a), it does not set a consent framework for Annex I & II EIA projects.
4. Will the PP, in view of its likely effect on sites, require an assessment for future development under Article 6 or 7 of the Habitats Directive? (Art. 3.2 (b))	Y See Fig 2	Due to the proximity to The River Wye, Wye Valley Woodlands, Wye Valley & FoD Bat sites and the Severn Estuary a Habitats Regulations screening assessment is required.

5. Does the PP Determine the use of small areas at local level, OR is it a minor modification of a PP subject to Art. 3.2? (Art. 3.3)	Y	The NDP determines the use of small areas at a local level.
6. Does the PP set the framework for future development consent of projects (not just projects in annexes to the EIA Directive)? (Art 3.4)	Y See Fig 2	The NDP determines the use of small areas at a local level. The Core Strategy and Allocations plan set a wider framework for the District including this area. However there is the potential for the plan to set a development framework for smaller sites.
7. Is the PP's sole purpose to serve the national defence or civil emergency, OR is it a financial or budget PP, OR is it co-financed by structural funds or EAGGF programmes 2000 to 2006/7? (Art 3.8, 3.9)	N See Fig 2	
8. Is it likely to have a significant effect on the environment? (Art. 3.5)	N	See Table 2 below 'Assessment of the likely significance of effects of the NDP.

4.2 In considering the results of table 1, in the context of figure 2, it can be seen that the SEA directive does apply when there are likely significant effects on the environment, see table 2.

4.3 Criteria for determining the likely significance of effects referred to in Article 3(5) of Directive 2001/42/EC are set out below:

Table 2: Assessment of the likely significant effects of the C-NDP		
SEA Directive Criteria	Response	Is there a significant or specific effect beyond that anticipated by the parent policy framework? Yes/No
1. The characteristics of plans and programmes, having regard, in particular, to:		
1a) The degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources.	The NDP is not considered to set a programme or framework for large scale projects. The plan is consistent with the Core Strategy, saved Local plan, the local transport plan and the emerging district Allocations Plan and therefore does not set an additional framework.	No
1b) The degree to which the plan or programme influences other plans and programmes including those in a hierarchy.	The NDP will form part of the Development Plan for the District. The NDP would be an influencing document in planning decisions and transport strategies. It is considered 'supportive & interpretive' rather than 'instructive'.	No
1c) The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development.	The NDP is developed within the framework for sustainable development as set out in the NPPF. The NDP provides supporting policies in respects of the Town Centre, Economy, Housing, Community Facilities, Historic Environment, Natural Environment; and Transport.	No

	Environmental factors are integrated within the plan.	
1d) Environmental problems relevant to the plan or programme.	None identified.	No
1e) The relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste management or water protection).	None identified	No
2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:		
2a) The probability, duration, frequency and reversibility of the effects.	Having regard to existing measures, controls and plans the NDP is considered to significantly restrict potential for any additional impacts by virtue of the small scale nature of proposals.	No
2b) The cumulative nature of the effects.	Cumulative impacts are those in connection with development proposals outlined in the Core Strategy/Allocations Plan. The NDP does not contribute additionally to factors already identified in the Core Strategy, Allocations Plan, Saved local Plan or Local Transport Plan.	No
2c) The trans boundary nature of the effects.	Whilst the NDP is expected to influence a wider area than that of just the NDP area, no trans boundary effects are identified.	No
2d) The risks to human	None Identified	No

health or the environment (e.g. due to accidents).		
2e) The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected).	The spatial coverage of the NDP is limited. On its own the spatial extent of proposals is not considered to give rise to likely significant environmental effects.	No
2f) The value and vulnerability of the area likely to be affected due to:		
i. special natural characteristics or cultural heritage.	Having regard to existing measures, controls and plans the NDP is considered to significantly restrict potential for any additional impacts by virtue of the small scale nature of proposals, the overall quantum of development proposed and restrictive environmental policies.	No
ii. exceeded environmental quality standards or limit values.	The NDP is not considered to set a programme or framework for larger scale development or impacts which are to lead to environmental limits being exceeded. The plan is consistent with the Core Strategy, saved Local plan, the local transport plan and emerging district Allocations Plan. In addition the plan also provides specific policy content which provides for environmental safeguards.	No
iii. intensive land-use.	On its own the intensification of land use is not considered to give rise to likely significant environmental effects.	No

<p>2g) the effects on areas or landscapes which have a recognised national, Community or international protection status.</p>	<p>Although the NDP borders and incorporates a small area of AONB. Overall it is considered that the plan, NPPF and Core strategy provide sufficient protection measures to this nationally designated landscape including landscape policy elements.</p>	<p>No</p>
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Source: Annex 2 of SEA Directive 2001/42/EC

5.0 Consultation

5.1 Three statutory bodies (for the purposes of SEA Screening, English Heritage, the Environment Agency and Natural England) were consulted in May 2017. No objections to the recommendations of the draft assessment, that the NDP can be screened out from SEA, were made (Appendix 1).

6.0 Changes to the plan following draft SEA assessment (April 2017)

6.1 Between the Consultation version (May 2017) and the draft Submission version (November 2017) of the plan there have been a number of changes to the plan. The majority, in policy terms, are small changes such as rewording or layout changes. Some changes are more significant and it is important to note these changes (table 3 below) and consider if they would result in any change to the screening assessment.

Table 3 - Key changes to the NDP from the Consultation draft (May 2017) and the Submission draft (November 2017).

Policy		Nature of change
CE3	Additional Policy - Improved Connectivity	Policy sets out development must be designed to connect to high quality communications infrastructure. Does not promote locations, areas or quantum's of development.
CE4	Additional Policy – Development other than housing	Policy relates to a site identified for employment development. Previously identified in CH3. Also identified in the allocations plan.
CH1	Amendment to Small housing development policy	Context of within defined settlement boundary added.
CH3	Amendments to the sites outside the Town centre policy	Addition of Poolway farm allocated for 80 houses. A larger area, incorporating the NDP allocation, is also allocated in the Allocations Plan. Additional land allocated at North Road and Kings Meade, is also allocated in the allocations plan. SAC policy requirement added.
CNE1	Amendments to protecting and enhancing local landscape	Policy rewording

Policy		Nature of change
CHE1	Additional policy text	Reinforcing the protection and enhancement of attractiveness of the town and gateway routes.
CITPA3	Additional Policy – Local infrastructure for health and well-being.	Policy sets out specific requirements for health related development in around Coleford.
CITPA	Policy renumbering	The CITPA policies have been renumbered following the inclusion of CITPA3.

6.2 The changes outlined above have been reviewed and it is considered that the impact of changes between the May 2017 and November 2017 versions of the plan do not result in a change to the SEA screening assessment.

5.10. Following November 2017 further changes to the plan have been made. There were many changes principally around the ordering and wording of the policies and the way the document is presented. Two policies were also deleted CTC5 (Tourism in the Town Centre) and CITPA 5 (Flooding). The topics highlighted by these policies can be found in amendments to other policies. These subsequent changes are considered not to have altered the plan substantially to an extent which would require re-consultation with the statutory consultees.

7.0 Statement of Reasons for Determination

7.1 Following the assessment set out above (tables 1-3) and consultation with statutory bodies the Forest of District Council has concluded that the Coleford Neighbourhood Development Plan will not result in significant environmental effects.

The plan:

- i. The geographic spread of the NDP is limited
- ii. The locations, scale and effects of the NDP are very limited
- iii. The NDP does not create a significant new framework or programme in addition to the existing Core Strategy, Allocations Plan, Saved Local Plan or Local Transport Plan.
- iv. The NDP is generally supportive and interpretive rather than instructive.

- v. The NDP in combination with the Core Strategy and Allocations Plan contains environmental mitigation and 'cancelation' factors

Appendix 1:

Responses from Statutory bodies to consultation draft of SEA screening (April 2017)

Historic England

From: Stuart, David [mailto:David.Stuart@HistoricEngland.org.uk]
Sent: 13 June 2017 15:53
To: Alastair Chapman
Cc: info@colefordtownplan.com
Subject: Coleford (Gloucestershire) Neighbour Development Plan - Strategic Environmental Assessment & Habitats Regulations Consultation

Dear Alastair

Thank you for your consultation on the SEA Screening for the Coleford Neighbourhood Plan.

Our apologies for not responding before now. Your consultation coincided with a consultation from the community on the draft Plan and so we have taken this opportunity to combine related activities. Apart from some liaison with the community on views analysis in April last year this is our first opportunity to familiarise ourselves with the Plan and its supporting evidence. This exercise has taken us a little while, especially given the need to understand the regime of site allocations proposed and the basis upon which it has emerged.

We are impressed with the scope of the Plan, and the depth of information which has informed its contents. We are always pleased when a Plan is underpinned by a desire to protect and reinforce locally distinctive character and of course to do so relies on an awareness of what it is that makes the area special. So the undertaking of character assessments and the provision of policies such as CTC1, CC4, CHE1, CHE2, CNE1, and CNE2 are particularly welcome.

For the purposes of the SEA Screening our attention has focused on policies CTC3, CTC4, CH3 as these appear to be the only policies specially allocating sites for development. Our interest is to ensure that the potential or likelihood of environment effects does not constitute harm to designated heritage assets. However, we appreciate that many of these sites have already been allocated for development in the Local Plan, are currently the subject of an associated review, or have the benefit of previously granted planning consents. Table 1a (p48), Table 4 (p67), Table 1b (p75) and Table 9 (p77), as well as the individual site assessments on the website, are useful in that respect, and the latter in particular possess generally a fine degree of analytical understanding of the role of the historic environment which is rare in our experience of neighbourhood plans.

CTC3. Includes Police Hub (already allocated), Marshes, Lords Hill (previous consent), and Lawnstone Site (modification to an existing allocation). We are happy that the principle of developing these sites has been established and that any potential for harm can be prevented by complementary policies.

CTC4. St John's Church. We endorse the presumption to retain the building in accordance with provisions for the historic environment in the National Planning Policy Framework (NPPF). The "if at all possible" qualifier should be removed to ensure conformity and unambiguity. Reference is made to a degree of enabling development being acceptable but the potential for this needs to be informed by an understanding of the significance of the Grade II Church and particularly its setting. Such accommodation within the policy needs to

be demonstrably deliverable and may therefore be premature without evidence and potentially a hostage to fortune.

Coleford House. Refers to “redevelopment”. It may be useful to more precisely define what is intended ie retention, conversion and possibly some new build, to avoid the suggestion that demolition would be acceptable.

CH3. Ellwood Road. Identified as a “last resort” allocation as against existing policy. We are not sure if such an allocation can demonstrate conformity but as it is outside the development boundary and in the protected Green Ring it may generate significant environmental effects. The Site Assessment confirms that there are “Listed Building comments” but it is not clear what these might be. Reference is made to the Dark Hill Scheduled Ancient Monument but not what its relationship is with the site. It may be useful to make more explicit what, if any, the heritage considerations and potential for impact might be.

Tuffhorn Avenue. An existing allocation with planning consent granted.

Based on our conclusions above, and allowing for the need to affirm the suitability of Ellwood Road, we would have no objection to the conclusion that an SEA is not required.

Our only additional thought is whether the schedule of negative and detracting elements identified on p37 could be used to more conspicuously inform the Developer Contribution List on p125.

Otherwise, it only remains for us to congratulate the community on its progress to date.

Please note that all communications on neighbourhood planning should be addressed to me.

Kind regards

David Stuart

David Stuart | Historic Places Adviser South West
Direct Line: 0117 975 0680 | Mobile: 0797 924 0316

Historic England | 29 Queen Square | Bristol | BS1 4ND



Date: 25 May 2017
Our ref: 215237
Your ref: Coleford NDP



Alastair Chapman
Sustainability Team Leader
Sustainability Team
Forest of Dean District Council

Hornbeam House
Crewe Business Park
Electra Way
Crewe
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BY EMAIL ONLY

T 0300 060 3900

Dear Mr Chapman,

Planning consultation: Coleford (Gloucestershire) Neighbourhood Development Plan – Strategic Environmental Assessment & Habitats Regulation Consultation.

Thank you for your consultation on the above dated 09/05/2017.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Strategic Environmental Assessment Screening

We welcome the production of this SEA Screening report. Natural England notes and concurs with the screening outcome i.e. that no SEA is required.

Further guidance on deciding whether the proposals are likely to have significant environmental effects and the requirements for consulting Natural England on SEA are set out in the [National Planning Practice Guidance](#).

Habitats Regulations Assessment Screening

Natural England notes the screening process applied to this Neighbourhood plan. We agree with the Council's conclusion of no likely significant effect upon the named European designated sites:

- Wye Valley and Forest of Dean Bat Sites SAC
- Wye Valley Woodlands SAC
- River Wye SAC
- Severn Estuary SAC/SPA
- Walmore Common SPA / Ramsar

Natural England's conclusion is subject to the points raised by the Sustainability Team being actioned and the draft Plan being amended, as appropriate.

Natural England will make further detailed comments on the Regulation 14 consultation to accompany this consultation.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact Tom Amos on 02080 260961. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service

Yours Choose salutation

Tom Amos
Adviser
Sustainable Development
South Mercia Team

Forest Of Dean District Council
Planning Policy
Council Offices
High Street
Coleford
Gloucestershire
GL16 8HG

Our ref: SV/2010/104029/OT-
09/IS1-L01

Your ref:

Date: 25 May 2017

F.A.O: Alastair Chapman

Dear Sir

Coleford Neighbourhood Development Plan – Strategic Environmental Assessment (SEA) and Habitats Regulation Screening Opinion Consultation

Thank you for referring the above consultation, which we received on 9 May 2017. We would offer the following comments to assist your consideration at this time.

Strategic Environmental Assessment:

The European Union directive 200142/EC requires a SEA to be undertaken for certain types of plans and programmes that would have 'significant' environmental effect(s). Furthermore paragraph: 046 in the Flood Risk and Coastal Change section of the National Planning Practice Guidance (NPPG) (Reference ID: 11-046-20150209) states "a strategic environmental assessment 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".

To assist your Council's determination of the SEA Screening opinion, we advise that based on the Screening Report Consultation Draft (dated April 2017) submitted, and in consideration of the matters within our remit, the Neighbourhood Plan is considered unlikely to have significant environmental impacts.

Habitats Regulation Assessment:

Article 6(3) of the European Habitats Directive (1992) requires that any plan (or project), which is not directly connected with or necessary to the management of a European site (also known as a "Natura 2000" site), but would be likely to have a significant effect on such a site, either individually or in combination with other plans or projects, shall be

Environment Agency
Newtown Industrial Estate (Riversmeet House) Northway Lane, Tewkesbury, Gloucestershire, GL20 8JG.
Customer services line: 03708 506 506
www.gov.uk/environment-agency

subject to an 'appropriate assessment' of its implications for the European site in view of the site's conservation objectives.

Based on records, we concur with the HRA Screening Report (Consultation Draft April 2017); there is one internationally designated wildlife sites located within/adjacent to the Coleford Neighbourhood Plan Area (Wye Valley and Forest of Dean Bat Special Area of Conservation (SAC)) and there are three further SACs and two Special Protection Areas (SPAs) within 20km.

We note the Screening Report refers to the HRAs undertaken for the Core Strategy and the Allocations Plan.

To assist your Council's determination of the HRA Screening opinion, we advise that based on the Screening Report submitted (including Appendix 2), and in consideration of the matters within our remit, the Neighbourhood Plan is considered unlikely to have significant effects on the European designated sites. We note section 7 of the Screening report proposes consultation with Natural England.

Going Forwards:

We sent your Council a copy of our Neighbourhood Plan pro-forma guidance for distribution to Parish Councils. The purpose of the guidance is to assist the preparation of Neighbourhood Development Plans, including an appropriate evidence base. This includes consideration of some of the relevant environmental issues that should be considered, including flood risk (from rivers and sea), water quality, water resources and includes latest Climate Change recommendations for flood risk. Since we produced this guidance we have updated our climate change allowances for planners. See [Flood risk assessments: climate change allowances](#) for more information. I have also enclosed a copy of area climate change guide to further assist.

For each proposed site allocation, we recommend completing the pro-forma to check the environmental constraints. This will help collect evidence, identify challenges, inform policy and assist delivery of sustainable solutions.

We would only make substantive further comments if the Plan was seeking to allocate sites for development in Flood Zones 3 and/or 2 (the latter being used as the 1% climate change extent). Furthermore, we do not offer detailed bespoke advice on policy but advise you ensure conformity with your Local Plan and refer to our guidance. This might assist with your consideration of a local environmental enhancements or improvement policies that may be necessary.

I trust that the above is of use to you at this time.

Yours faithfully

Mrs Tessa Jones
Senior Planning Advisor

Direct dial 02030 251700
Direct e-mail tessa.jones@environment-agency.gov.uk

End

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