

Freshford and Limpley Stoke Neighbourhood Plan Habitats Regulations Assessment (HRA) Screening

1. Screening Methodology

Each element of the emerging plan has been categorised against the screening criteria developed by Natural England. This process is necessary to help provide a clear audit trail for the assessment and, if necessary, identify the need for the wording of policies to be amended or new policies added to be certain that the neighbourhood plan will not have a significant negative effect on a European site.

The criteria used were as follows:

- Category A1: The policy will not itself lead to development e.g. because it relates to design or other qualitative criteria for development;
- Category A2: The policy is intended to protect the natural environment;
- Category A3: The policy is intended to conserve or enhance the natural, built or historic environment;
- Category A4: The policy would positively steer development away from European sites and associated sensitive areas;
- Category A5: The policy would have no effect because no development could occur through the policy itself, the development being implemented through later policies in the same plan, which are more specific and therefore more appropriate to assess for their effects on European Sites and associated sensitive areas.
- Category B – no significant effect;
- Category C – likely significant effect alone; and
- Category D – Likely significant effects in combination.

The effect of each policy has been considered both individually, and in combination. The effects of the whole plan have also been considered in combination with both the Wiltshire and Bath and North East Somerset Core Strategies.

2. Wiltshire Core Strategy Habitats Regulations Assessment

Wiltshire Core strategy HRA screened in the following potential effects of development at in the Bradford on Avon Community Area upon the Natura 2000 network¹:

Recreation

- Salisbury Plain SPA and SAC
- Bradford and Bath Bats SAC

Hydrology / Hydrogeology

- Salisbury Plain SAC / SPA
- Bath and Bradford on Avon Bats SAC
- Pewsey Downs SAC

¹ See Appendix A

- North Meadows and Clattinger Farm SAC
- River Avon SAC

Nitrogen Deposition

- Porton Down SPA
- Salisbury Plain SAC / SPA
- Southampton Water SPA
- Clattinger Farm SAC
- River Avon SAC
- Rodborough Common SAC
- Cotswolds Beechwoods SAC

Physical Damage / Interruption of Flight Lines

- Bath and Bradford on Avon Bats SAC

The emerging Freshford and Limpley Stoke neighbourhood plan has been screened against each of these potential impacts, for each Natura 2000 site.

The Wiltshire Core Strategy HRA tested the potential effects of the above development upon the Natura 2000 network and initially identified that it could potentially have significant effects upon the Bath and Bradford Bats SAC in combination with projected development in the wider Wiltshire Core Strategy and neighbouring development plans. However it concluded that the policy would not have significant effects subject to Wiltshire Council issuing and implementing guidance on development within 4km of the SAC component sites, and inclusion of a statement that any development which would have an adverse effect upon and SAC will not be in accordance with the Wiltshire Core Strategy (CP50).

3. Emerging Freshford and Limpley Stoke Neighbourhood Plan

It is understood that the emerging Freshford and Limpley Stoke Neighbourhood Plan will address the following issues (as set out in the 'Making Progress' document):

- HOUSING
- VILLAGE GREEN
- HIGHWAYS AGENCY COLLABORATION
- TRAFFIC CALMING
- PARKING
- FOOTPATHS, PAVEMENTS & CYCLEWAYS
- INTEGRATED COMMUNITY CENTRE
- PUBLIC TRANSPORT
- BUSINESS AND TECHNOLOGY
- ENVIRONMENT

All parts of the plan have been screened for potential impacts upon the Natura 2000 network, as set out in section 2.

4. Initial Habitats Regulations Screening Assessment of the Freshford and Limley Stoke Neighbourhood Plan
 a. Screening assessment of individual elements of the plan

Key:

A / B (Green) – Screened out

C / D (Red) – Screened in

| Section of plan | Element screened | Categorisation in initial screening | Comments and recommendations |
|-----------------|--|-------------------------------------|---|
| Housing | Housing needs | A1 | |
| | Affordable housing | A1 | |
| | New housing | D? | The neighbourhood plan area lies within 4km of the Bath and Bradford Bats SAC – WC guidance has identified that development within this zone could potentially affect the site integrity and will need to be brought forward sensitively. Housing on brownfield sites could result in the loss of horseshoe bat roosts, while development on Greenfield sites could result in the local of foraging / commuting features. Site selection should avoid suitable sites were possible, and include caveats to ensure protection of bat habitats. |
| | Freshford Mill | D? | Redevelopment of this site could potentially affect horseshoe roosts. Presumably the developer has carried out bat surveys as part of the planning process – these should be obtained to identify and potential impacts. |
| | Protect the green lungs of the community | A3 | The NPPE , which now allows local communities to designate Local Green Spaces through neighbourhood plans. Your attention is drawn to Para. 76, which may provide an appropriate mechanism to protect your local green spaces. |
| Village Green | Freshford Tynning | A3 | Please note that DEFRA is currently in the process of scaling back the village green process due to large numbers of vexatious applications. This process is largely being replaced through the NPPE , which now allows local communities to designate Local |

| Section of plan | Element screened | Categorisation in initial screening | Comments and recommendations |
|------------------------------------|------------------------------|-------------------------------------|--|
| | | | Green Spaces through neighbourhood plans. Your attention is drawn to Para. 76, which may be a more appropriate mechanism to protect your local green spaces. |
| | Middle Stoke | A3 | As above |
| Highways agency collaboration | Speed limits | A1 | |
| | Protecting Pedestrians | A1 | |
| Traffic Calming | 20mph zone | A1 | Please note that Freshford is a conservation area. The materials, signage and layout of the street scene will need to respect the heritage assets and character of the town. Please speak to the relevant conservation officer at BNES for further advice. |
| | Gateways | A1 | As above. |
| | Hop pole junction | A1 | As above. |
| | Freshford school | A1 | As above. |
| Parking | Limpley Stoke | D | Parking should avoid potential horseshoe bat habitats and lighting should be restricted where it is adjacent to such features. |
| | Memorial Hall/community shop | D | As above |
| | Freshford | D | As above |
| Footpaths, pavements and cycleways | Church Field footpath | B | Please contact the relevant right of way team to assist with this aspect of the plan. For Wiltshire please contact Michael Crook 01225 713349. |
| | School path | B | As above |
| | Cycleway & Meadow footpath | B | As above |
| | More pavements | B | Please note that Freshford is a conservation area. The materials, signage and layout of the street scene will need to respect the heritage assets and character of the town. Please speak to the relevant conservation officer at BNES for further advice. |
| Integrated community centre | Memorial hall and shop | B | |
| | Memorial hall | B | |
| | Community shop | B | |
| Public transport | Train & Bus Services | A1 | |
| Business and technology | Superfast broadband | B | |
| | Workshops | B | |

| Section of plan | Element screened | Categorisation in initial screening | Comments and recommendations |
|-----------------|--------------------------------------|-------------------------------------|--|
| | Telephone coverage | B | |
| Environment | Environment group | A3 | |
| | Our heritage | A3 | |
| | Flooding and drainage | B | It is recommended that you establish whether the Freshford Stream is classified as an Environment Agency main river. If so, please contact EA about these proposals. If not, then the local authorities will act as the lead drainage authority for these watercourses, please contact the relevant land drainage teams. For Wiltshire the contact will be Danny Everett 01249 445554. |
| | Energy Conservation and Green Energy | B | Wiltshire Council has officers which support and encourage the use of sustainable construction and may be able to provide advice with this part of the plan, please contact Ralph Perry-Robinson 01225 713806. Please note that hydroelectric schemes will require consent from the EA, please contact the local office for advice on this matter. |
| | Street lighting | D | Horseshoe bats are very sensitive to artificial lighting. Any alterations to the street lighting should be planning sensitively to avoid adverse impacts upon horseshoe flight lines / foraging areas. |

- b. Assessment of all elements of the plan 'in combination'
 - Possible significant effects of housing, redevelopment of Freshford Mill, new parking and additional lighting in combination

- c. Assessment of the effects of the plan as a whole, in combination with Wiltshire and BNES Core Strategies
 - Possible in-combination effects due to additional housing within 4km of the SAC in the wider Wiltshire and BNES administrative areas.