

BROAD CHALKE NEIGHBOURHOOD PLAN HABITATS REGULATIONS ASSESSMENT (HRA)

1. Introduction

- 1.1. This iteration of the Habitats Regulations Assessment (HRA) has been undertaken to inform a Regulation 14 consultation response from Wiltshire Council to the Broad Chalke Neighbourhood Plan 2019 – 2026 (Regulation 14 Consultation Draft Version – January 2020), hereafter referred to as the NP.
- 1.2. The HRA has been carried out to comply with Regulation 105 of the Habitats Regulations 2017. Under these Regulations, a competent authority must consider whether a relevant plan is likely to have a significant effect on any European sites before deciding to give any consent, permission or other authorisation. If the screening exercise demonstrates significant effects are likely, whether or not these are addressed through mitigation measures¹, the competent authority must undertake an appropriate assessment to examine the effects of the plan on the conservation objectives of the European Sites in question, consult the appropriate nature conservation body and have regard to its representations. Both the screening, and any subsequent appropriate assessment, must consider the impacts of the plan alone and in combination with other plans or projects.
- 1.3. It is usually the case that a plan of this nature does not go into the detailed aspects of development proposals and therefore the full effects of potential development cannot be accurately assessed at the plan making stage. Those details will typically be identified through a planning application which would be subject to further, more detailed HRA. The principle that a HRA need only consider the effects of a proposal or policy in as much detail as is specified by the plan was explained by Advocate General Kokott in a judgement brought against the UK government in 2005:

“Many details are regularly not settled until the time of the final permission. It would also hardly be proper to require a greater level of detail in preceding plans or the abolition of multi-stage planning and approval procedures so that the assessment of implications can be concentrated on one point in the procedure. Rather, adverse effects on areas of conservation must be assessed at every relevant stage of the procedure to the extent possible on the basis of the precision of the plan. This assessment is to be updated with increasing specificity in subsequent stages of the procedure.”²
- 1.4. Where appropriate assessment is undertaken, the competent authority may go on to authorise the plan or project provided it will not adversely affect the integrity of any European sites. Otherwise the plan cannot be authorised unless it meets specific statutory tests.
- 1.5. Wiltshire Council has conducted the following HRA as competent authority for the Broad Chalke NP. Where risks to European Sites are identified, changes are recommended to remove or reduce the risks, and these should be incorporated into the plan before it is made. Likewise,

¹ Court of Justice of the European Union, Case C 323/17 “People Over Wind”/P. Sweetman v Coillte Teoranta

² Commission of the European Communities v UK and NI, opinion of Advocate General KoKott, 9 June 2005, Case C-6/04

if the policies or planning context change after the HRA is completed, the HRA process must be repeated before the final plan is considered by a referendum and adopted.

2. Screening Methodology

2.1. Each element of the plan has been categorised against screening criteria developed by Natural England to provide a clear audit trail for the screening assessment.

2.2. The screening criteria used are 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.

2.3. The effect of each policy has been considered both individually and in combination with other plans and projects (see table in section 4 below). Where potential for likely significant effects have been identified, an appropriate assessment is undertaken in subsequent sections.

3. Higher Level HRAs

Wiltshire Core Strategy

3.1 The Wiltshire Core Strategy HRA (October 2009, February 2012³, March 2013⁴, February 2014⁵ and April 2014⁶) identified general parameters to determine the likelihood of potential impacts on Natura 2000 (European protected) sites. The following potential impact pathways and associated parameters were identified and assessed for the Natura 2000 sites stipulated below.

³ Wiltshire Core Strategy Submission Draft – Assessment under the Habitats Regulations, Wiltshire Council, February 2012

⁴ Wiltshire Core Strategy – Assessment under the Habitats Regulations, Wiltshire Council, March 2013

⁵ Update to the Wiltshire Core Strategy habitats Regulations Assessment, February 2014 (Exam/89)

⁶ Wiltshire Core Strategy Updated Habitats Regulations Assessment, April 2014

- *Recreation – Natura 2000 sites within 5km, or where Salisbury Plain SPA/SAC is within 15km (it should be noted that the relevant parameter for the latter has since been revised on the basis of data obtained by means of visitor surveys and is now 6.4km):*
 - Salisbury Plain SPA / SAC
 - River Avon SAC
 - New Forest SAC / SPA
 - Bath and Bradford on Avon Bats SAC (added post adoption of Wiltshire Core Strategy)
- *Hydrology / Hydrogeology - Sites that fall wholly or partly within the Wessex Water Resource Zone may be susceptible to impact:*
 - Salisbury Plain SAC / SPA
 - Bath and Bradford on Avon Bats SAC
 - Pewsey Downs SAC
 - North Meadow and Clattinger Farm SAC
 - River Avon SAC
 - River Lambourn SAC
 - Kennet & Lambourn Floodplain SAC
- *Air Pollution / Nitrogen Deposition – Natura 2000 sites within 200m of a main road*
 - Porton Down SPA
 - Salisbury Plain SAC / SPA
 - Southampton Water SPA
 - North Meadow and Clattinger Farm SAC
 - River Avon SAC
 - Rodborough Common SAC
 - Cotswolds Beechwoods SAC
- *Physical Damage / Interruption of Flight Lines / Disturbance*
 - Bath and Bradford on Avon Bats SAC
 - Porton Down SPA
 - Chilmark Quarries SAC (added post adoption of Wiltshire Core Strategy)
 - Mottisfont Bats SAC (added post adoption of Wiltshire Core Strategy)

Recreation

- 3.2 In terms of recreational pressure, the NP area lies beyond the 8km radius around the New Forest SAC/SPA within which the majority (75%) of day visitors to the New Forest originate⁷.
- 3.3 Recreational pressure on the River Avon SAC is recognised to occur in limited circumstances predominately where significant development lies immediately adjacent or in close proximity to the river, which will not occur as a result of this NP.
- 3.4 In relation to Salisbury Plain, the SAC habitat features were screened out of appropriate assessment for the Core Strategy on the advice of Natural England. The Salisbury Plain SPA can also be screened out of appropriate assessment with respect of this NDP as the NDP area is beyond the 6.4km zone around the SPA within which the majority (75%) of visitors to the Plain are expected to live. This is based on the data collated by means of a visitor survey commissioned by the Council in 2015.

Hydrology / Hydrogeology

- 3.5 In terms of hydrology/hydrogeology, the whole of the Broad Chalke NP area lies within the catchment of the River Avon SAC. Consequently, any proposals for development within the NP area will need to be phosphate neutral and demonstrate that it will not diminish the ability of the SAC to achieve its conservation objectives within timescales identified in the River Avon Nutrient Management Plan (NMP). The Council is working with the Environment Agency and Natural England to ensure appropriate mitigation is in place for development coming forward under the Core Strategy and Local Plan Review; the associated implications in relation to this NP will need to be considered further and taken forward to Appropriate Assessment.

Air Pollution / Nitrogen Deposition

- 3.6 The Wiltshire Core Strategy HRA identified that increased traffic would lead to potential effects through an increase in atmospheric pollution and nitrogen deposition upon a range of Natura 2000 sites within 200m of a main road. Such effects were considered to be very small and difficult to predict at the strategic level⁸. The allocation in the NP for approximately nine dwellings is considered to be a small number in relation to the total for the county. Furthermore, the majority of the Natura 2000 sites listed above, with the exception of the River Avon SAC, Chilmark Quarries SAC and also Prescombe Down SAC (located approximately 2.1km to the west of the NP area at its nearest point) are a considerable distance from the NP area and effects are likely to be negligible. In relation to the River Avon SAC, the Wiltshire Core Strategy HRA concluded no likely significant effect where the existing approach to mitigation in Core Policy 55 is implemented. It is therefore concluded that the proposals for housing in this NP would not have an adverse effect on Natura 2000 sites or the integrity of its qualifying features as a result of nitrogen or particulate matter deposition.

Physical Damage / Interruption of Flight Lines / Disturbance

- 3.7 In terms of the potential to cause physical damage to features which provide habitat for bats, such as breeding, roosting and foraging habitat, and the potential to interrupt or fragment bat flight lines, or to cause disturbance to such features, it is deemed that the NP area is too

⁷ Wiltshire Core Strategy Updated Habitats Regulations Assessment, April 2014

⁸ Update to the Wiltshire Core Strategy Habitats Regulations Assessment, February 2014 (Exam/89)

remote to have implications for bats at the Bath and Bradford on Avon Bats SAC or the Mottisfont Bats SAC. Chilmark Quarries SAC, which is a hibernation site for all four species of Annex II bats occurring in the UK, is located approximately 4.9km northwest of the NP area at its closest point, and the north-western section of the NP area lies within the SAC's 6km consultation zone for Barbastelle bat. Policies 4A and 4B allocate low numbers of houses at Sites 4 and 5 respectively, neither of which lie within the aforementioned 6km Barbastelle consultation zone. Both of the allocated sites comprise green field land which may have potential to serve as commuting routes and/or foraging habitat for Annex II bat species associated with the Chilmark Quarries SAC. Nonetheless, given the small scale of development proposed at Sites 4 and 5, the considerable alternative habitat in the area and scope to be able to retain and buffer habitat features as part of the design process at the planning application stage, it is deemed that the NP can be screened out of appropriate assessment in respect of Chilmark Quarries SAC. Whilst the risk of impacts is considered low, it will be necessary however, for any development proposals in relation to the allocated sites (or any other sites within the NP area) to be informed by an appropriate level and scope of ecological surveys at the planning application stage; and as such bat surveys may be required.

- 3.8 The NP area is also beyond the potential zone of influence with respect of stone curlews breeding at Porton Down SPA and Salisbury Plain SPA and will not result in physical damage to the habitats within the Natura 2000 sites, nor will it result in the interruption of flight lines or disturbance to breeding stone curlew, such as by means of the introduction of visual stimuli or noise.

Wiltshire Housing Site Allocations Plan

- 3.9 Since the Core Strategy was adopted, the Council published a pre-submission draft of the Wiltshire Housing Site Allocations Plan (WHSAP) together with a HRA dated 21 June 2017. A schedule of proposed changes was considered by Cabinet supported by an Addendum to the HRA dated May 2018. A schedule of changes and an Addendum to the HRA incorporating minor factual changes were published in September 2018 for public consultation. Subsequently, the WHSAP (Council Version, February 2020) was adopted by Full Council on 25th February 2020 and this was accompanied by the final WHSAP Assessment under the Habitats Regulations (Wiltshire Council, February 2020).
- 3.10 The screening criteria for the adopted WHSAP and final HRA were modified for some European sites from those used for the Core Strategy subsequent to the acquisition of results from new surveys, and in light of advice from Natural England. The following screening applies the most up to date criteria available from the WHSAP and HRA.

4. Screening of Policies in Broad Chalke Neighbourhood Plan 2019 – 2026 (Regulation 14 Consultation Draft Version – January 2020)

- 4.1 The Broad Chalke Neighbourhood Plan 2019 – 2026 (Regulation 14 Consultation Draft Version – January 2020) comprises 11 planning policies and several action plans; these are detailed and assessed in Table 1 below.
- 4.2 The HRA screening exercise has ascertained that there is one European Site where a mechanism for effect as a result of the NP and its policies exists, and that is the River Avon SAC. This is because Policies 4A and 4B allocate sites for housing and these sites, as well as the

whole NP area, lie within the catchment of the River Avon SAC. As such, the aforementioned policies have potential to give rise to significant effects upon the SAC and will therefore need to be taken forward to Appropriate Assessment.

- 4.3 It is considered that none of the other policies within the NP would lead directly to development, nor would they result in a likely significant effect on any Natura 2000 sites, either alone or in-combination with other plans or projects. This is due to the nature, scope and scale of the proposals set out in the other policies, and on account of the distance of the NP area from Natura 2000 sites and the absence of a potential pathway for effect.

TABLE 1: Habitats Regulations Assessment Screening of the Broad Chalke Neighbourhood Plan

A / B (Green) – Screened out			
C / D (Red) – Screened in			
Policy	Policy Summary and Assessment under Habitats Regulations	Screening Category	Comments and Recommendations
1A Development Strategy for Broad Chalke	<p>This policy sets out an overall strategy for development in Broad Chalke over the Plan period and is augmented by Figure 4. The policy stipulates that development proposals that will support the delivery of the Development Strategy will be supported in principle. It also specifies that infill development within the settlement boundary will only be supported where it conforms to criteria detailed within the policy.</p> <p>The policy will not result in development itself and will not result in a likely significant effect upon any Natura 2000 sites. Details of any development that comes forward would be considered at the planning application stage to ensure it aligns with this policy and that there will be acceptability with respect of other Development Plan policies and the National Planning Policy Framework 2019 (NPPF).</p>	A1	
2A – Important Green Spaces	<p>The NP specifies the objective of this policy is to protect and enhance the environment and to protect open/green spaces and ancient woodland. The policy identifies six green spaces (also illustrated on Figure 5) and stipulates that these are to remain open and that development will only be supported where it is ancillary to the function of these as green spaces and where it will not adversely affect their character or openness.</p> <p>The policy will not result in development itself but instead aims to protect green spaces. Furthermore, the policy will not result in a likely significant effect upon any Natura 2000 sites. Details of any development that comes forward would be considered at the planning application stage to ensure acceptability with respect of other Development Plan policies including Core Policy 50 (Biodiversity and Geodiversity), 51 (Landscape) and 52 (Green Infrastructure) of the Wiltshire Core Strategy (Adopted January 2015), and the National</p>	A2	It may be worth considering a revision to the policy wording to make particular reference to green infrastructure (GI), and for consideration to be given to the potential listing of other GI assets and features that may warrant protection in addition to the six green spaces listed in the policy.

Policy	Policy Summary and Assessment under Habitats Regulations	Screening Category	Comments and Recommendations
	Planning Policy Framework 2019 (NPPF).		
2B – Ecology	<p>The NP specifies the objective of this policy is to protect and enhance the environment and to protect open/green spaces and ancient woodland.</p> <p>The policy states: <i>‘Development proposals in Broad Chalke must demonstrate how they retain, protect and manage sites of biodiversity interest such as the Sites of Special Scientific Interest and County Wildlife Sites identified in Figure 6. Where possible, development should contribute towards providing net gains of biodiversity. The removal or damage of these areas of ecology will only be acceptable where the ecological impacts have been mitigated as far as possible and where ecological networks are retained and appropriate compensatory measures can ensure no net loss of biodiversity. Planning permission will be refused for development resulting in the deterioration or loss of irreplaceable habitats including Broad Chalke’s ancient woodlands, as identified on Figure 6, unless the need for the development and its benefits clearly outweigh the harm.’</i></p> <p>The policy will not result in development itself and will not result in a likely significant effect upon any Natura 2000 sites. Details of any development that comes forward would be considered at the planning application stage to ensure acceptability with respect of other Development Plan policies including Core Policy 50 (Biodiversity and Geodiversity), 51 (Landscape) and 52 (Green Infrastructure) of the Wiltshire Core Strategy (Adopted January 2015), and the National Planning Policy Framework 2019 (NPPF).</p>	A1/A2	<p>The intent of the policy is supported; however, it is recommended the wording be revised as SSSIs are statutorily protected and contrary to the wording of the policy, development proposals should not entail management measures for SSSIs, although measures to protect SSSIs and to ensure no direct or indirect adverse effects upon such sites should be proposed if development is proposed within proximity.</p> <p>Furthermore, the policy suggests that development proposals that could adversely affect SSSIs may be acceptable if mitigation and compensation is proposed. SSSIs are afforded legal protection and no proposals for new development on these sites should be permitted regardless of whether mitigation and/or compensation is put forward. Certain activities are sometimes undertaken within SSSIs, such as those conducted by such ‘statutory undertakers’ as electricity and water companies, however, in these instances assent must be obtained in advance from Natural England. Nonetheless, new development such as residential development, within SSSIs is not acceptable. The policy wording should be amended accordingly.</p> <p>It is also suggested that the policy wording is strengthened so that it accords more closely with CP50 of the Wiltshire Core Strategy as well as the NPPF 2019, specifically paragraphs 118 and 170, in respect of the requirement for biodiversity net gain. For context, the Environment Bill has just gone through its second reading at the House of Commons and the Bill sets out how environmental standards will be maintained and</p>

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Policy	Policy Summary and Assessment under Habitats Regulations	Screening Category	Comments and Recommendations
			<p>aims to build on the Government’s 25 Year Environment Plan. The Government announced in the Spring Statement last year that it will mandate net gains for biodiversity (with certain exceptions) in the Environment Bill. As it stands Policy 2B only specifies that development should contribute towards net biodiversity gains ‘where possible’. I would suggest that in line with the NPPF 2019, CP50 and the forthcoming Environment Bill, ALL development (with certain exceptions) should deliver a biodiversity net gain and reference to this being delivered ‘where possible’ should be removed from the policy wording; instead the policy should specify that it must be delivered. This is particularly important given the climate and ecological emergency which was declared by Wilshire Council last year and in light of the need for climate change adaptation and resilience to be incorporated within new development.</p>
<p>2C – Addressing and Adapting to Climate Change</p>	<p>The NP specifies that the objective of this policy is to contribute to climate change adaptation and mitigation. The policy sets out that planning applications for development that would be achieve high standards of energy efficiency and sustainable construction will be encouraged, and that there is an expectation for new development to integrate renewable technology wherever possible. It also specifies that surface treatments in proposals for residential, commercial and public car parking and hard standing areas should demonstrate how surface water and associated run off will be managed in a sustainable way.</p> <p>The policy will not result in development itself but instead aims to positively steer potential development to be sustainable and resilient to climate change. Moreover, the policy will not result in a likely significant effect upon any Natura 2000 sites. Details of any development that comes forward would be considered at the planning application stage to ensure acceptability with other Development Plan policies including Core Policy 41 (Sustainable Construction and Low-carbon Energy), and</p>	<p>A1</p>	<p>The policy is welcomed. It is suggested that there may be scope for the policy to be extended to require that development proposals also seek to incorporate other sustainability measures wherever possible, such as greywater recycling systems; and for there to be a requirement for the use of low environmental impact materials and materials from sustainable sources; especially wood. Perhaps the policy should advocate the incorporation of electric charging points for electric vehicles.</p> <p>I would also draw the NP Group’s attention to the comments provided above pertaining to Policy 2B and the need for developments to deliver biodiversity net gain. This is likewise pertinent to this policy as habitat enhancements such as tree planting, should also be an element of any new development on account of the</p>

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Policy	Policy Summary and Assessment under Habitats Regulations	Screening Category	Comments and Recommendations
	the National Planning Policy Framework 2019 (NPPF).		benefit in terms of carbon sequestration, flood risk management and climate change resilience. Currently, the policy does not set out requirements in terms of habitat enhancements that would be expected alongside proposals for any new development. As per the comments above, the requirements for biodiversity net gain and ecological enhancements currently set out in the NP could be significantly strengthened to ensure any new development within the NP area delivers both, and to ensure greater alignment with national and county level planning policy, as well as the forthcoming Environment Bill.
3A – Heritage Assets	<p>The policy stipulates that new development should protect and enhance local heritage assets and their settings, and that the potential for development to impact upon below ground archaeology should be assessed when preparing development proposals, and appropriate and proportional archaeological investigation should take place.</p> <p>The policy aims to positively steer development and to protect heritage and archaeological assets and will not result in development itself. Furthermore, the policy would not result in a likely significant effect upon any Natura 2000 sites. Details of any development that comes forward would be considered at the planning application stage to ensure acceptability with respect of other Development Plan policies including Core Policy 58 (Ensuring the Conservation of the Historic Environment) of the Wiltshire Core Strategy (Adopted January 2015), and the National Planning Policy Framework 2019 (NPPF).</p>	A1/A3	
3B – Design and Character	The NP specifies that the objective of this policy is to protect and enhance Broad Chalke’s unique historic and built environment. The policy stipulates that new development should demonstrate its relationship and suitability to its site, setting and context in terms of scale, materials, form, details, layout, public space and historic character. The policy highlights that this is of particular importance within the Broad Chalke Conservation Area, and that new development	A1	With respect of criteria ‘b.’ within Policy 3B please refer to comments provided above regarding the requirement for biodiversity net gain.

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Policy	Policy Summary and Assessment under Habitats Regulations	Screening Category	Comments and Recommendations
	<p>should contribute positively to the character of Broad Chalke. The policy goes on to set out criteria to which any new development should conform.</p> <p>The policy will not itself lead to development but aims to steer and positively influence the design, quality and character of any new development coming forward. The policy will not result in a likely significant effect upon any Natura 2000 sites. Details of any development that comes forward would be considered at the planning application stage to ensure acceptability with respect of other Development Plan policies including Core Policy 57 (Ensuring High Quality Design and Place Shaping) and 58 (Ensuring the Conservation of the Historic Environment) of the Wiltshire Core Strategy (Adopted January 2015), and the National Planning Policy Framework 2019 (NPPF).</p>		
3C – Landscape and Views	<p>This policy stipulates that new development will only be permitted where it can be demonstrated that it will not adversely impact on the Cranborne Chase and West Wiltshire Downs Area of Outstanding Natural Beauty. It also states that all new development should aim to minimise light pollution and avoid obtrusive external property lighting and street lighting; and that development proposals must demonstrate how the dark skies environment will be protected.</p> <p>The policy lists nine identified key views within Broad Chalke which it specifies should be protected and maintained, and these are also shown on the accompanying Figure 10. The policy indicates that any planning application which might impact on these locally valued key views should be accompanied by a visual impact assessment and mitigation proposals where applicable.</p> <p>The policy will not itself lead to development and will not result in a likely significant effect upon any Natura 2000 sites. Details of any development that comes forward would be considered at the planning application stage to ensure acceptability with respect of other</p>	A1/A2	Policy 3C refers to eight identified key views, however nine views are actually listed within the policy and shown on Figure 10; this discrepancy should be amended accordingly.

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Policy	Policy Summary and Assessment under Habitats Regulations	Screening Category	Comments and Recommendations
	Development Plan policies including Core Policy 51 (Landscape) and 52 (Green Infrastructure) of the Wiltshire Core Strategy (Adopted January 2015), and the National Planning Policy Framework 2019 (NPPF).		
4A – Site Allocation: Site 4	<p>This policy allocates land at Site 4 (Knighton Road (Western End, South) for the development of approximately six community-led affordable homes to meet identified local housing needs. The policy details criteria with which any new housing development should conform. The policy stipulates that the intention is for the site to be developed by Broad Chalke Community Land Trust and to provide homes to local people who qualify as being in housing need.</p> <p>The development of the site allocated in this policy has potential to result in a likely significant effect upon the River Avon SAC and as such is screened in to appropriate assessment on this basis.</p> <p>In addition, Site 4 comprises green field land and therefore has the potential to be used as a commuting route and/or foraging habitat by Annex II bat species associated with the Chilmark Quarries SAC. Nonetheless, given the modest scale of development, the ample habitat alternatives in the area and scope to be able to retain and buffer habitat features as part of the design process, it is deemed that this policy can be screened out of appropriate assessment for this SAC.</p> <p>Details of any proposal(s) for development of Site 4 will need to be considered at the planning application stage to ensure acceptability with respect of other Development Plan policies including Core Policy 50 (Biodiversity and Geodiversity) of the Wiltshire Core Strategy (Adopted January 2015), and the National Planning Policy Framework 2019 (NPPF).</p>	D	Site 4, and indeed the whole NP area, lies within the catchment of the River Area SAC and as such this policy is screened into appropriate assessment (AA) on account of the potential for a likely significant effect upon the SAC.
4B – Site Allocation: Site 5	This policy allocates land at Site 5 (Manor Farm Road) for the development of approximately three open market homes to meet identified local market housing need. The policy details criteria with which any new housing development should conform.	D	Site 5, and indeed the whole NP area, lies within the catchment of the River Area SAC and as such this policy is screened into appropriate assessment (AA) on account of the potential for a likely significant effect upon the SAC.

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Policy	Policy Summary and Assessment under Habitats Regulations	Screening Category	Comments and Recommendations
	<p>The development of the site allocated in this policy has potential to result in a likely significant effect upon the River Avon SAC and as such is screened in to appropriate assessment on this basis.</p> <p>In addition, Site 5 comprises green field land and therefore has the potential to be used as a commuting route and/or foraging habitat by Annex II bat species associated with the Chilmark Quarries SAC. Nonetheless, given the modest scale of development, the ample habitat alternatives in the area and scope to be able to retain and buffer habitat features as part of the design process, it is deemed that this policy can be screened out of appropriate assessment for this SAC.</p> <p>Details of any proposal(s) for development of Site 5 will need to be considered at the planning application stage to ensure acceptability with respect of other Development Plan policies including Core Policy 50 (Biodiversity and Geodiversity) of the Wiltshire Core Strategy (Adopted January 2015), and the National Planning Policy Framework 2019 (NPPF).</p>		
5A – Local Facilities	<p>This policy specifies that development which would entail the loss of any community facilities that are listed within the policy and shown on the accompanying Figure 15, would not be supported unless a number of criteria stipulated within the policy would be fulfilled.</p> <p>The policy will not itself lead to development and will not result in a likely significant effect upon any Natura 2000 sites. Details of any development that comes forward would be considered at the planning application stage to ensure acceptability with respect of other Development Plan policies and the National Planning Policy Framework 2019 (NPPF).</p>	A1	
5B – Local Employment	<p>This policy sets out that existing local businesses and premises will be protected, and that any proposals for the change of use of an existing business premises away from employment activity will be resisted, unless it can be adequately demonstrated that the existing use is no longer economically viable. It also supports development proposals</p>	A1	

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	<p>which will encourage tourism, subject to certain considerations. Proposals to enhance telecommunications infrastructure including broadband is also supported by the policy, as are proposals for extensions to residential properties in order to facilitate homeworking.</p> <p>The policy will not itself lead to development and will not result in a likely significant effect upon any Natura 2000 sites. Details of any development that comes forward would be considered at the planning application stage to ensure acceptability with respect of other Development Plan policies and the National Planning Policy Framework 2019 (NPPF).</p>		

5. Conclusion

- 5.1 The HRA screening exercise presented in this document has concluded that the Broad Chalke NP may result in a likely significant effect on the River Avon SAC. Therefore, it will be necessary for the NP to be subject to an appropriate assessment under the Conservation of Habitats and Species Regulations 2017.
- 5.2 It should be noted that if any changes are made to the NP or the policies contained therein, it will be necessary for the amended NP to be subject to a repeat HRA screening exercise.
- 5.3 It is also noted that the phosphates issue has not been raised in the NP and as such, for the sake of transparency, I suggest that this subject is referred to at an appropriate place in the NP itself.

Prepared by [REDACTED] Ecologist, Wiltshire Council, 28th February 2020