

CHIPPENHAM WITHOUT NEIGHBOURHOOD PLAN HABITATS REGULATIONS ASSESSMENT (HRA)

1. Introduction

- 1.1. This Habitats Regulations Assessment (HRA) relates to the Chippenham Without Neighbourhood Plan 2022 – 2036 Draft August 2022, hereafter referred to as the NP, which was submitted to Wiltshire Council together with a formal screening request in March 2023. This HRA has been undertaken to inform a Regulation 16 consultation response from Wiltshire Council to the NP.
- 1.2. The HRA has been carried out to comply with Regulation 105 of the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019¹, hereafter referred to as the Habitats Regulations. Under these Regulations, a competent authority must consider whether a relevant plan is likely to have a significant effect on any European sites (formerly also referred to as Natura 2000 sites and now known as the national site network²) 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 measures³, 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.”⁴

- 1.4. Where appropriate assessment is undertaken, the competent authority may go on to authorise the plan provided that it will not adversely affect the integrity of any European sites. Where an **adverse effect on the integrity (AEol)** of any European sites cannot be ruled out, and where there are no alternative solutions, the plan can only be authorised and proceed if there are **imperative reasons of over-riding public interest (IROPI)** and if the necessary compensatory measures can be secured.

¹ On 1st January 2021 the Conservation of Habitats and Species Regulations 2017 were amended by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. Most of these changes involved transferring functions from the European Commission to the appropriate authorities in England and Wales. All other processes or terms in the 2017 Regulations remain unchanged and existing guidance is still relevant. The obligations of a competent authority in the 2017 Regulations for the protection of sites or species do not change [Changes to the Habitats Regulations 2017 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/news/changes-to-the-habitats-regulations-2017)

² On 1st January 2021 the Conservation of Habitats and Species Regulations 2017 (as amended) were amended by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019

³ Court of Justice of the European Union, Case C 323/17 “People Over Wind”/P. Sweetman v Coillte Teoranta

⁴ Commission of the European Communities v UK and NI, opinion of Advocate General Kokott, 9 June 2005, Case C-6/04

- 1.5. Wiltshire Council has conducted the following HRA as competent authority for the Chippenham Without 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, 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 (NE) 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 other 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.
 - 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 1 in Section 4 below). Where potential for likely significant effects have been identified, an appropriate assessment is presented in subsequent sections.

3. Higher Level HRAs

Wiltshire Core Strategy

- 3.1 The Wiltshire Core Strategy (WCS) HRA (October 2009, February 2012⁵, March 2013⁶, February 2014⁷ and April 2014⁸) identified general parameters to determine the likelihood of potential impacts on European sites (now known as the national site network⁹). The following potential impact pathways and associated parameters were identified and assessed for the European sites stipulated below.

- *Recreation – European sites within 5km of the plan area, or where the New Forest Special Protection Area (SPA)/Special Area of Conservation (SAC) is within 13.8km (extended to 15km where HRA indicates this is necessary) of the plan area or where Salisbury Plain SPA/SAC is within*

⁵ Wiltshire Core Strategy Submission Draft – Assessment under the Habitats Regulations, Wiltshire Council, February 2012

⁶ Wiltshire Core Strategy – Assessment under the Habitats Regulations, Wiltshire Council, March 2013

⁷ Update to the Wiltshire Core Strategy habitats Regulations Assessment, February 2014 (Exam/89)

⁸ Wiltshire Core Strategy Updated Habitats Regulations Assessment, April 2014

⁹ On 1st January 2021 the Conservation of Habitats and Species Regulations 2017 (as amended) were amended by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019

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 WCS)
- North Meadow and Clattinger Farm SAC (added post adoption of WCS)
- *Hydrology / Hydrogeology – European 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 – European 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)

Wiltshire Housing Site Allocations Plan

- 3.2 Since the WCS 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 further 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).

- 3.3 The screening criteria for the adopted WHSAP and final HRA were modified for some European sites from those used for the WCS subsequent to the acquisition of results from new surveys, and in light of advice from NE. This includes the zone of influence (Zoi) around the Salisbury Plain SPA used to screen for likely significant effects as a result of recreational pressure being revised from 15km to 6.4km on the basis of data obtained by means of visitor surveys.
- 3.4 Furthermore, since the WCS was adopted, NE has advised Wiltshire Council of its concerns regarding the growing number of visitors to the North Meadow and Clattinger Farm SAC in recent years which has led to an increase in trampling. NE has advised that this is particularly evident at North Meadow (which is also a National Nature Reserve (NNR)) during April and May when visitors come to see the Snake’s-head fritillaries in flower. NE considers that the increase in recreational pressure upon the SAC is primarily as a result of increases in the local population, and that major new housing developments within a short travel distance of North Meadow are likely to add to the existing visitor pressure and trampling effects. An interim Zoi of 8km for the North Meadow element of the North Meadow and Clattinger Farm SAC is being used by Wiltshire Council as this is consistent with the approach being applied by Swindon Borough Council. The Zoi will be refined once bespoke visitor surveys have been undertaken.
- 3.5 Impacts of development in Wiltshire on the New Forest SPA were considered in the HRA for the South Wiltshire Core Strategy (SWCS) adopted in 2012¹⁰. The assessment used data from the Tourism South East PROGRESS survey for 2004/05 and census data from 2001 for the former Salisbury District to examine patterns of visitors to the New Forest from across south Wiltshire. That HRA concluded that the development in south Wiltshire would increase visitor pressure by less than 1% and 89% of this would be through additional local day visits from within 8 km of the National Park. The WCS addressed the New Forest’s mitigation requirements through Core Policy 50, identifying that a New Forest Mitigation Strategy would be prepared to address recreational impacts. Since the WCS was adopted, the council has joined a partnership of local authorities seeking to develop a strategic approach to address the impacts of recreational pressure on the New Forest SPA. A Government grant through the Planning Delivery Fund enabled visitor surveys to be conducted across the New Forest in 2018/19. This work was recently published, and the Council is now part of a steering group working to agree a common approach to mitigation including the extent of the Zoi and how to fairly reflect different visit rates within it. This evidence has informed the preparation of an Interim Recreation Mitigation Strategy by Wiltshire Council.
- 3.6 The WCS adopted the 8km zone of influence, however, as discussed in the latest iteration of the council’s strategy¹¹, from 1st September 2021 this has been revised to 13.8 km. Before this date, the mitigation scheme only applied to permitted dwellings lying within 8km of the New Forest designated sites whereas thereafter the scheme has been extended to apply to new residential and tourism development within 13.8 km of any of the New Forest designated sites and may be extended to include applications within 15km, where demonstrated to be necessary through a bespoke appropriate assessment.
- 3.7 Since the WCS was adopted and on the advice of NE, any plan or project that will lead to development within the catchment of the River Avon SAC must be phosphorous neutral and be subject to appropriate assessment which concludes no adverse effect on the SAC alone or in-combination with other plans or projects in order to be authorised.

Emerging Evidence and Advice from Natural England Subsequent to Adoption of WHSAP

- 3.8 Similarly, it came to light in spring 2020 that any plan or project that will lead to development within the catchment of the River Test must be nitrogen neutral as the Test drains into the Solent and this region is protected by a number of European and international designations including the Solent Maritime SAC, Chichester and Langstone Harbours SPA, Portsmouth Harbour SPA and Solent and Southampton Water

¹⁰ South Wiltshire Proposed Submission Core Strategy HRA Report, Appendix 13. NPA for Wiltshire Council, July 2009

¹¹ The Interim Recreation Mitigation Strategy has not been reviewed by Natural England at the time of writing.

SPA and Ramsar site. In 2018 and 2019 NE undertook a number of condition assessments of the features of these designated sites around the Solent. These assessments identified that high levels of nitrogen and phosphorus are entering this water environment and that there is sound evidence that nitrogen in particular is causing eutrophication at the aforementioned designated sites and that the resulting excessive growth of green algae and plants, which reduces oxygen and light levels, is leading to negative effects on the special features for which the European sites are designated. These nutrient inputs currently mostly come either from agricultural sources or from wastewater from existing housing and other development. These findings were published by NE in June 2020 in *Advice on Achieving Nutrient Neutrality for New Development in the Solent Region*. This advice also stipulates that:

“There is uncertainty as to whether new growth will further deteriorate designated sites. This issue has been subject to detailed work commissioned by local planning authorities (LPAs) in association with Natural England, Environment Agency and water companies. This strategic work, which updates early studies, is on-going. Until this work is complete, the uncertainty remains and the potential for future housing developments across the Solent region to exacerbate these impacts creates a risk to their potential future conservation status.

One way to address this uncertainty is for new development to achieve nutrient neutrality. Nutrient neutrality is a means of ensuring that development does not add to existing nutrient burdens and this provides certainty that the whole of the scheme is deliverable in line with the requirements of the Conservation of Habitats and Species Regulations 2017 (as amended).

This report sets out a practical methodology to calculating how nutrient neutrality can be achieved. This methodology is based on best available scientific knowledge, and will be subject to revision as further evidence is obtained. It is our advice to local planning authorities to take a precautionary approach in line with existing legislation and case-law when addressing uncertainty and calculating nutrient budgets.”

- 3.9 In accordance with NE’s advice, any plan or project which will lead to development within the catchment of the River Test cannot be approved unless nitrogen neutrality has been demonstrated via quantitative means, and an appropriate assessment conducted by the competent authority has concluded beyond reasonable scientific doubt that there would be no adverse effects on the integrity of any of the Solent region European sites.
- 3.10 In 2022 the River Lambourn SAC and the Somerset Levels and Moors Ramsar site were identified by NE as being in unfavourable condition due to excessive phosphorus inputs. A very small area of both of these sites are located within Wiltshire. Any overnight accommodation development within the catchment of the SAC or Ramsar site are now required to demonstrate phosphorous neutrality and be subject to an appropriate assessment which concludes no adverse effect on the SAC or Ramsar site alone or in combination with other plans or projects in order to be authorised.

Screening of Chippenham Without NP Area

Recreation

- 3.11 In terms of recreational pressure, the NP area lies more than 55km from the New Forest SPA/SAC and is therefore a substantial distance beyond both the 13.8km and 15km ZoI around the SPA/SAC within which the majority of day visitors to the New Forest originate¹².
- 3.12 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 as the River Avon SAC lies approximately 28.6km southeast of the plan area at its closest point.

¹² Wiltshire Core Strategy Updated Habitats Regulations Assessment, April 2014

- 3.13 In relation to Salisbury Plain, the SAC habitat features were screened out of appropriate assessment for the WCS on the advice of NE. The Salisbury Plain SPA can also be screened out of appropriate assessment in respect of this NP as the plan 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 Wiltshire Council in 2015.
- 3.14 In addition, the NP area is located approximately 18.1km south west of the interim 8km ZoI around the North Meadow element of the North Meadow and Clattinger Farm SAC, at its closest point, and as such appropriate assessment with respect of this European site can be screened out.

Hydrology / Hydrogeology

- 3.15 In terms of hydrology/hydrogeology, Chippenham Without is located within the catchment of the Bristol Avon rather than the Hampshire Avon, and as such there is no pathway for a likely significant effect on the River Avon SAC as a result of the NP.
- 3.16 There have been no water resource issues identified for the Bath and Bradford on Avon Bats SAC which is the only SAC from the above list to lie fully within the Bristol Avon catchment. Furthermore, the Bristol Avon has not identified as a cause of water resource issues for the Salisbury Plain SAC/SPA.

Air Pollution / Nitrogen Deposition

- 3.17 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 European sites within 200m of a main road. Such effects were considered to be very small and difficult to predict at the strategic level¹³. The Chippenham Without NP does not allocate any sites for development and all of the European sites listed above are a considerable distance from the NP area; as such it is concluded that the NP will not result in significant effects on European sites as a result of nitrogen or particulate matter deposition.

Physical Damage / Interruption of Flight Lines / Disturbance

- 3.18 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/sever bat flight lines, or to cause disturbance to such features, it is deemed that the NP area is too remote to have implications for bats at the Bath and Bradford on Avon Bats SAC, the Mottisfont Bats SAC or Chilmark Quarries SAC.
- 3.19 The NP area is also beyond the potential ZoI with respect of stone curlews breeding at Porton Down SPA and Salisbury Plain SPA and as such the NP will not give rise to significant effects on these European sites.

4. Screening of Policies in Chippenham Without Neighbourhood Plan 2022 – 2036 Draft August 2022

- 4.1 The Chippenham Without NP comprises 15 policies; these are detailed and assessed in Table 1 below.
- 4.2 All parts of the NP have been screened for potential impacts which may arise from the plan alone or in combination with other plans and projects. None of the policies within the NP allocate sites for development or would lead directly to development, nor would any of the policies result in a likely significant effect on any European 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 NP, and on account of the distance of the NP area from any European sites and the absence of a potential pathway for effect.
- 4.3 Any further drafts of the NP and/or changes made to the NP as a result of the examination in public should be subject to a rescreening assessment before the plan is adopted.

¹³ Update to the Wiltshire Core Strategy Habitats Regulations Assessment, February 2014 (Exam/89)

TABLE 1: Habitats Regulations Assessment Screening of the Chippenham Without 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
Policy CWoNP - HE1	<p>The policy states: <i>'All new development within the Neighbourhood Plan Area must demonstrate good quality design by demonstrating a positive response to the local character of the historic rural landscape.'</i></p> <p>This policy relates to housing design and will not in itself lead to development or result in a likely significant effect upon any European sites.</p>	A1	
Policy CWoNP - HE2	<p>The policy stipulates: <i>'All new developments within the Neighbourhood Plan Area must demonstrate good quality design by responding to the local character of the historic built and natural environment.'</i></p> <p>This policy aims to positively influence the design of new development and to conserve and enhance the natural, built and historic environment. The policy will not in itself lead to development or give rise to a mechanism for likely significant effects upon any European sites.</p>	A1 / A3	
Policy CWoNP – HE3	<p>This policy seeks to ensure that all developments within the NP area do not adversely affect either structurally or visually the Parish's heritage assets.</p> <p>This policy seeks to conserve and enhance the natural and built environment and will not lead directly to development or give rise to likely significant effects on any European sites</p>	A3	
Policy CWoNP - NE1	<p>The policy requires that: <i>'Development proposals must:</i></p> <ul style="list-style-type: none"> <i>a. Demonstrate how proposals consider the landscape character of Allington, Sheldon and Lanhill including setting and visual impacts.</i> <i>b. Protect existing rights of way and link in new routes to offer the community opportunities for additional countryside access routes and cycleways where possible.</i> <i>c. Include landscape enhancements of appropriate species mix and character.'</i> 	A1 / A3	

Policy	Policy Summary and Assessment under Habitats Regulations	Screening Category	Comments and Recommendations
	<p>This policy sets out criteria for new development with the objective of conserving and enhancing the natural environment and access to the countryside. Development will not take place as a direct result of the policy and it will not lead to a likely significant effect upon any European sites.</p>		
Policy CWoNP - NE2	<p>This policy specifies: <i>'All new development must seek to contribute to sustainable development. Proposals should:</i></p> <ul style="list-style-type: none"> <i>a. Deliver biodiversity net gains.</i> <i>b. Enhance geodiversity where possible.</i> <i>c. Adopt best practice in sustainable urban drainage.'</i> <p>This policy details biodiversity and sustainability objectives that development must endeavour to meet, and the policy will not itself lead directly to development. As such, there is no pathway for likely significant effects upon any European sites as a result of this policy.</p>	A1 / A3	
Policy CWoNP - BE1	<p>This policy requires that: <i>'All proposals must demonstrate that the distinctive landscape character of the built environment is conserved and where possible enhanced. Proposals that would either individually or cumulatively result in the coalescence of settlements will not be supported.'</i></p> <p>This policy aims to conserve and enhance the natural and built environment and will not lead directly to development or give rise to likely significant effects on any European sites.</p>	A3	
Policy CWoNP - BE2	<p>This policy stipulates: <i>'Development proposals that constitute sustainable construction will be supported.'</i> The policy goes on to state that features and requirements are provided in Annex M of the NP.</p> <p>This policy supports sustainable development and will not itself lead to development, nor will it result in a likely significant effect upon any European sites.</p>	B	
Policy CWoNP - BE3	<p>This policy states: <i>'Development proposals must be of a high quality which respects the Local character, and it must be demonstrated that:</i></p> <ul style="list-style-type: none"> <i>a. New development is of a scale that is appropriate within both its immediate context as well as the character of the local area.</i> <i>b. Materials used within new developments are appropriate and respond to the</i> 	A1 /A3	

Policy	Policy Summary and Assessment under Habitats Regulations	Screening Category	Comments and Recommendations
	<p><i>local vernacular.</i></p> <p><i>c. The form of new development must respect the existing character of the area.</i></p> <p><i>d. Designated Heritage Assets and their settings must be thoroughly considered where appropriate.'</i></p> <p>This policy relates to design and other qualitative criteria for development and aims to conserve and enhance the built historic environment. The policy will not in itself lead to development or give rise to a mechanism for likely significant effects upon any European sites.</p>		
Policy CWoNP - E1	<p>The policy requires that: <i>'Development should aim to include improvements to network provisions and internet connectivity to support sustainable work environments.'</i> The policy goes on to state that there is no formal requirement for the development of new roads or for the expansion of the existing network.</p> <p>This policy will not itself lead to development or give rise to a mechanism for likely significant effects upon any European sites.</p>	B	
Policy CWoNP - E2	<p>The policy specifies: <i>'Development that is of a scale to support the local rural economy will be supported provided that:</i></p> <p><i>a. The development results in a viable economic use to facilitate the protection of a designated heritage asset, or</i></p> <p><i>b. The development is demonstrated to contribute to a prosperous rural economy.'</i></p> <p>This policy will not itself lead to development or result in a likely significant effect upon any European sites.</p>	A3 / B	
Policy CWoNP - E3	<p>This policy states: <i>'Development proposals for sustainable farming which are of an appropriate scale within the rural context of the Neighbourhood Plan Area will be supported.'</i></p> <p>This policy will not itself lead to development or result in a likely significant effect upon any European sites.</p>	B	
Policy CWoNP - E4	<p>This policy stipulates: <i>'Proposals for community facilities that are of an appropriate scale will be supported.</i></p> <p><i>Any proposals that would result in the loss of community facilities must clearly demonstrate that a community use is not viable.</i></p>	B	

Policy	Policy Summary and Assessment under Habitats Regulations	Screening Category	Comments and Recommendations
	<p><i>Proposals which are for the loss of a community facility but are able to demonstrate that the facility will be replaced in an alternative location within the Neighbourhood Plan Area will be supported.'</i></p> <p>This policy will not itself lead to development or give rise to a mechanism for likely significant effects upon any European sites.</p>		
Policy CWoNP - H1	<p>This policy states: <i>'Development proposals for new dwellings must be supported by evidence of genuine need:</i></p> <ul style="list-style-type: none"> <i>a. Rural exception site for affordable housing, where it is demonstrated that identified local need is supported, or;</i> <i>b. Agricultural workers housing will be permitted if there is proven need, or;</i> <i>c. Is required in order to maintain a heritage asset of acknowledged importance, or;</i> <i>d. Whereby housing is needed to support older people to remain within the community.'</i> <p>This policy will not directly result in development or give rise to a mechanism for likely significant effects upon any European sites.</p> 	A1 / B	
Policy CWoNP - H2	<p>This policy specifies: <i>'Replacement dwellings will be supported where it would result in an improvement to the quality of the built environment. Any proposals for replacement dwellings within Allington Conservation Area and its setting must demonstrate how the replacement dwelling will provide enhancement to the Conservation Area.'</i></p> <p>This policy will not directly result in development or give rise to a mechanism for likely significant effects upon any European sites.</p>	A3 / B	
Policy CWoNP - H3	<p><i>'Proposals for new dwellings must demonstrate how the dwelling can be adapted to meet changing needs over time.'</i></p> <p>This policy will not directly result in development or give rise to a mechanism for likely significant effects upon any European sites.</p>	A1 / B	

5. Conclusion

- 5.1 The HRA screening exercise presented in this document has concluded that the Regulation 16 consultation draft of the Chippenham Without NP will not result in a likely significant effect on any European sites or their qualifying features either alone or in-combination with other plans and projects. Therefore, it has not been necessary to subject the NP to an appropriate assessment under the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019.
- 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 before it can be 'made'.

Prepared by [REDACTED] Ecologist, Wiltshire Council, 28 March 2023
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