

Cricklade Neighbourhood Plan Habitats Regulations Assessment (HRA) Screening

1. Screening Methodology

Each element of the plan¹ has been categorised against the screening criteria developed on behalf of, and endorsed by Natural England². This approach is advised to help provide a clear audit trail for the assessment of local planning documents (which may be applied to neighbourhood plans), and if necessary identify the need for the policies to be removed / amended or new policies added to be certain that the 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.

2. Wiltshire Core Strategy HRA

Wiltshire Core strategy HRA screened in the following potential effects of development at in the Royal Wootton Bassett and Cricklade Community Area upon the Natura 2000 network³:

Hydrology / Hydrogeology

- Kennet and Lambourne Floodplain SAC
- North Meadows and Clattinger Farm SAC
- Kackpenn Hill SAC
- Kennet Valley Alderwoods SAC
- River Lambourne SAC
- Cotswold Beechwood SAC
- Rodborough Common SAC

¹ Cricklade Neighbourhood Plan – Draft Plan November 2016

² The Habitats Regulations Handbook

<http://www.dtapublications.co.uk/Login.aspx?ReturnUrl=%2fHandbook%2fBrowse.aspx>

³ Wiltshire Core Strategy: Assessment under the Habitats Regulations, Appendix A. (March 2013)

Nitrogen Deposition

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

Policies within the emerging Cricklade Neighbourhood Plan have been screened against each of the above potential impacts, for each Natura 2000 site.

3. Draft Cricklade Neighbourhood Plan

The Cricklade Neighbourhood Plan includes policies to address the following objectives:

- Housing
- Traffic and Transport
- Business
- Look and Feel

All parts of the plan have been screened for potential impacts upon the Natura 2000 network, as set out in Section 4.

4. Other Plans and Projects

Plans

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 the adopted Wiltshire Core Strategy, the Swindon Borough Local Plan and the emerging Cotswold District Council Local Plan (2011 – 31).

Projects

A review of recent projects in the local area has provided further information on the issue of residential pressure on the North Meadows and Clattinger Farm SAC, which was raised in the previous version of the HRA screening assessment (31/03/16). Recent dialogue with Natural England officers has confirmed that increasing recreational pressure is a concern, largely due to trampling effects and difficulties with managing the site. Natural England's raise an objection to a major residential scheme on greenfield land at Stone's Farm (16/12052/OUT) on the basis of the potentially adverse effects upon the SAC. The Council carried out a HRA screening, confirming that a full appropriate assessment of the effects would be required, and raising significant concerns with the applicant that the effects of further development to the north of the town will be difficult to mitigate and should be avoided where possible. The application has not been withdrawn and does not currently contribute to in combination effects, however this provides useful context when assessing the neighbourhood plan.

A smaller residential scheme at Stone's Farm was approved by the Council in 2016 (15/01159/OUT), before it was aware of the potentially significant effects of development in this location on the SAC.

No appropriate assessment was carried out and as a result no mitigation was secured, therefore this project will have likely significant effects on the SAC which need to be considered in combination.

Similar concerns were raised in relation to the redevelopment the Culverhay estate (15/08666/FUL), however it was agreed that that project would have considerably lower effects on the SAC than the Stone's Farm proposals. That project requires full appropriate assessment, however it is anticipated that it will pass that process, subject to securing appropriate mitigation measures. It is reasonable to assume that there may be some residual effects of the Culverhay project which will contribute to increasing pressures on the SAC, which are relevant to future in combination assessments.

5. Initial Habitats Regulations Screening Assessment of the Ashton Keynes Neighbourhood Plan

a. Screening assessment of individual policies

A / B (Green) – Screened out

C / D (Red) – Screened in

Policy Area	Policy	Initial screening	Comments and recommendations
Core Objectives - Housing	Policy H1: The Settlement boundary	A4	<p>This policy seeks to limit development at the town to infill within the settlement boundaries as shown in the plan until 2026. No further development is proposed through the plan.</p> <p>This policy will help to contain development at the town and prevent it from extending any closer towards North Meadow and Clattinger Farm SAC, where it could contribute to recreational pressure on the site; in that respect the policy would have positive effects in helping to protect the SAC. Infill development is likely to be small scale and unlikely to have significant effects.</p> <p>Optional modification: The supporting text to this policy could potentially highlight the importance of containing development at the town in order to help protect the SAC.</p>
	Policy H2: Visual Separation of Settlements	A3	
	Policy H3: Design of New Housing	A1	
	Policy H4: Housing Mix on Sites	A1	
	Policy H5: Affordable Housing	A1	
	Policy H6: Local Connection and Strong Communities	A1	
	Policy H7: Housing for the Elderly	A1	
	Policy H8: Nursing Home Provision	B	
	Policy H9: Residential Car Parking	A1	

Policy Area	Policy	Initial screening	Comments and recommendations
	Policy H10: Foul Water Management	A3	
	Policy H11: Flood Risk	A3	
Transport and Traffic	Policy TT1: Traffic Impact	A3	
	Policy TT2: Traffic Calming	A3	
	Policy TT3: Off-road routes in Cricklade	A3	
Business	Policy B1: The Primary Shopping Area	B	
	Policy B2: The Town Centre Area	B	
	Policy B3: Town Centre Car Parking	B	
	Policy B4: Police Station Site	B	
	Policy B5: Promotion of Business	C	<p>This policy will support tourism facilities and the growth of the tourism economy through increased visitors to the town and local area. Proposals which significantly increase tourism at the town could potentially exacerbate recreational pressures upon the SAC, increasing the risk of a gradual deterioration of the site. Very modest proposals are unlikely to generate any likely significant effects on the SAC, however it is possible that proposals which would increase visitors to the SAC may require further HRA and may need to contribute to appropriate mitigation measures as a result.</p> <p>Require modification: The supporting text to the policy should highlight potential effects of increasing tourism at the town upon the North Meadows SAC and the potential need to contribute to mitigation measures. Individual planning applications for tourism development may be subject to HRA by Wiltshire Council in order to assess these effects and any need for mitigation measures.</p>
	Policy B6: The Chelworth Commercial Area	A3	
Look and Feel	Policy LAF1: Public Open Space	A3	Protection of public open space for recreation is increasingly important for avoiding increasing recreational pressure on the North Meadows SAC.

Policy Area	Policy	Initial screening	Comments and recommendations
			<p>Optional modification: The supporting text to this policy could potentially highlight the importance of protecting recreational assets at the town in order to help protect the SAC.</p>
	Policy LAF2: Allotments	A1	
	Policy LAF3: Provision of Public Open Space	A3	<p>Provision of public open space for recreation is increasingly important for avoiding increasing recreational pressure on the North Meadows SAC.</p> <p>Optional modification: The supporting text to this policy could potentially highlight the importance of providing adequate recreational sites at the town in order to help protect the SAC.</p>
	Policy LAF4: Local Green Space	A3	<p>Protection of public open space for recreation is increasingly important for avoiding increasing recreational pressure on the North Meadows SAC.</p> <p>Optional modification: The supporting text to this policy could potentially highlight the importance of protecting recreational assets at the town in order to help protect the SAC.</p>
	Policy LAF5: SUSTRANS Cycleway 45 and Thames Path National Trail	A3	
	Policy LAF6: Cricklade Canal	C	<p>As for Policy B5, there is a risk that more significant tourism proposals at the town could increase recreational pressure on the North Meadows SAC. Applications for such development may require HRA and appropriate mitigation.</p> <p>Required modification: The supporting text to the policy should highlight potential effects of increasing tourism at the town upon the North Meadows SAC and the potential need to contribute to mitigation measures. Individual planning applications for tourism development may be subject to HRA by Wiltshire Council in order to assess these effects and any need for mitigation measures.</p>

Policy Area	Policy	Initial screening	Comments and recommendations
	Policy LAF7: Swindon and Cricklade Railway	B	
	Policy LAF8: Community Facilities	B	

The majority of impacts have been screened out for the following reasons:

- Impacts were screened out by the Wiltshire Core Strategy HRA and those conclusions remain valid
- They are qualitative criteria for new development (A1)
- They aim to protect the local environment of the town (A3)

Since the last iteration of the plan the housing policies have been modified to the extent that they would no longer have likely significant effects, and indeed the emphasis on containment within the settlement boundary may have beneficial effects by helping to protect the North Meadows SAC from further greenfield development to the north of the town, where it would have likely significant effects. Policies LAF1, 3 and 4 may also have beneficial effects inasmuch as they will protect the existing recreational resources at the town and ensure that adequate provision is made by new development, therefore helping to avoid increasing recreational pressure on the North Meadows SAC.

The only exceptions to this are policies B5 and LAF6, which could have likely significant effects upon the North Meadows and Clattinger Farm SAC. It is not currently clear what scale or location of tourism / housing development would be supported under these policies, therefore as a proportionate and precautionary measure it is recommended that relevant supporting text recognises this potential constraint to development, highlighting the a possible need for applications to be subject to HRA and for development proposals to provide mitigation measures as a result. Provided the recommended supporting text is included for each of these policies, it is concluded that these policies would not have any likely significant effects on the Natura 2000 network.

- b. Assessment of all policies within the plan 'in combination'
- Policies B5 and LAF6 could have an in-combination effect upon the North Meadows and Clattinger Farm SAC through increased recreational pressure from tourism and housing.
 - This effect could be addressed through the recommended inclusion of supporting text to these policies and through HRA of individual planning applications.
- c. Assessment of the effects of the plan as a whole, in combination with other plans and projects
- The plan could have in-combination effects with the Wiltshire Core Strategy, Swindon Borough Local Plan and the emerging Cotswold District Local Plan which also propose housing development in the local area. Although these housing sites would be more distant from the SAC, they would also be larger, and therefore could generate further recreational visits to the North Meadows and Clattinger Farm SAC site from local residents. HRA of those individual plans has not identified likely significant effects which would require mitigation, and any such effects are considered to be relatively small.
 - The plan itself does not define or propose any development which would directly contribute towards recreational pressure on the SAC which can be assessed at the current time, and as such it can be concluded that the plan would not have any likely significant effects on the SAC in combination with other plans and projects.

6. Conclusion

Supporting text for B5 and LAF6 should be amended to incorporate the recommendations made in this HRA; it is recommended that this is put forward as a proposed minor modification through the examination process. The plan could also have beneficial effects of helping to protect the North Meadows SAC from increasing recreational pressures by avoiding greenfield development to the north of the town and protecting / enhancing local alternative recreational resources, which could be highlighted in the supporting text, however those changes are not required by the HRA and should be at the discretion of the neighbourhood planning group and inspector.

It may be concluded that the plan would not have any likely significant effect upon the Natura 2000 network either alone or in combination with other plans or projects, subject to the recommended minor modifications to B5 and LAF6, and as such no appropriate assessment is required in accordance with Regulation 102 of the Habitats Regulations.