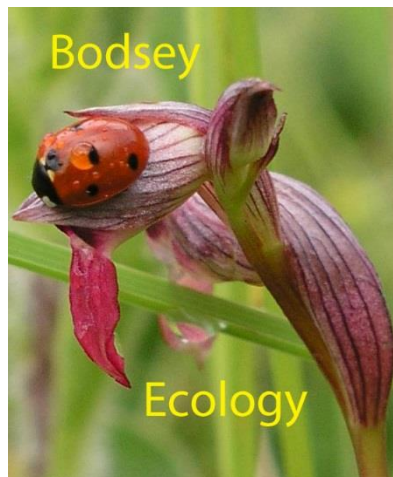


# Habitat Regulations Assessment for the Harrold Neighbourhood Plan

**Bodsey Ecology Limited**

**29 April 2020**

[www.bodseyecology.co.uk](http://www.bodseyecology.co.uk)



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Harrold Neighbourhood Plan – Habitats Regulations Assessment 2020

Issue 2 Harrold Neighbourhood Plan HRA (29th April 2020)

Prepared by: Pete Carey

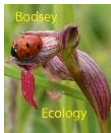
Date: 29 April 2020

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Director: Bodsey Ecology Limited



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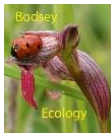
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# 1 EXECUTIVE SUMMARY

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- 1.1.1 The Conservation of Habitats and Species Regulations 2017 [the Habitats Regulations] require that Habitats Regulation Assessment (HRA) is applied to all statutory land use plans in England and Wales. HRA is achieved by carrying out an Appropriate Assessment.
- 1.1.2 Neighbourhood plans are nested within Local Plans. A HRA must determine whether significant effects on a Natura 2000 site can be ruled out on the basis of objective information and best scientific knowledge.
- 1.1.3 Appropriate Assessment for any development plan is a three stage process: screening, the appropriate assessment itself that identifies whether the integrity of Natura 2000 sites could be compromised; and alternative solutions that include avoidance and mitigation measures. Until a ruling by the European Court of Justice in 2018 it was assumed that existing planned mitigation measures against likely significant effects to Natura 2000 sites could allow those Natura 2000 sites to be 'screened out' at the first stage of the appropriate assessment process. The "People Over Wind" ruling has changed that assumption. It is no longer possible to screen out predicted adverse impacts on Natura 2000 sites where they are avoided or mitigated against without appropriate assessment. It is possible, however, to screen out threats that are neither likely nor significant during the screening stage. HRA allows for a fourth stage that only applies in cases where adverse impacts are predicted even after alternative solutions have been tried and where there are imperative reasons of overriding national interest that the project should go ahead. It would be extremely unlikely that a Neighbourhood Plan could ever reach this fourth stage.
- 1.1.4 The HRA for the Bedford Borough Local Plan 2030 (Bodsey Ecology, 2018) identified likely significant effects on two Natura 2000 sites, The Ouse Washes (SAC/SPA/Ramsar) and Portholme (SAC), downstream of Bedford. Although the policies within the Local Plan should protect the Natura 2000 sites if followed (Bodsey Ecology, 2019), detail was not available from the emerging Neighbourhood Plans to confirm this for all developments. Further screening of the Neighbourhood Plans will ensure that there were no unforeseen likely significant effects whilst undertaking the HRA or its addendum for the Bedford Borough Local Plan 2030. The HRA of Neighbourhood Plans will also ensure that they all avoid or mitigate against likely significant effects identified in the Bedford Borough Local Plan 2030 by their own policies or by complying with those of Bedford Borough.
- 1.1.5 Screening of the Harrold Neighbourhood Plan identified the same likely significant effects on the two Natura 2000 sites as the Bedford Borough Local Plan 2030 but at a reduced scale. Appropriate assessment (AA Stage 2) showed that the policies of the Harrold Neighbourhood Plan Version V4 did not offer protection to the Natura 2000 sites. The rewording of objectives and policies are required to protect the River Great Ouse from small developments of dwellings that are to be built. The new policy and rewording of the objectives and other policies do provide the framework to avoid or mitigate against the likely significant effects and their subsequent adverse impact on the qualifying features and site integrity.
- 1.1.6 This HRA has to assume that water quantity and quality in the River Great Ouse will not be compromised because the future strategic plans of Anglian Water will prevent this from happening. The safeguard that these future plans will protect the River Great Ouse and consequently the Natura 2000 sites along it is that those plans will each have their own HRA.
- 1.1.7 This HRA concludes that the Harrold Neighbourhood Plan can proceed as it will not have adverse impacts on any Natura 2000 sites, the qualifying features and/or the integrity of those sites itself or in combination with other plans that have currently been adopted.



## 2 THE LEGISLATIVE CONTEXT

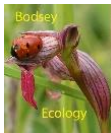
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- 2.1.1 The National Policy Planning Framework (July 2018)<sup>1</sup> (NPPF) states that to protect and enhance biodiversity and geodiversity, plans should:
- Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and
  - promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.
- 2.1.2 In addition to the requirements of the NPPF, the Conservation of Habitats and Species Regulations 2017 [the Habitats Regulations] require that Habitats Regulation Assessment (HRA) is applied to all statutory land use plans in England and Wales, including Neighbourhood Plans. The Parish Council, as the 'plan-making' or 'relevant competent' authority, must before the plan is given effect, make a HRA through Appropriate Assessment (AA) of the implications for the site in view of that site's conservation objectives where (a) the plan is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects), and (b) is not directly connected with or necessary to the management of the site (Paragraph 102 of the Habitats Regulations 2017).
- 2.1.3 The aim of the HRA process is to assess the potential effects arising from a plan against the conservation objectives of any European site designated for its nature conservation importance.
- 2.1.4 The Habitats Regulations transpose the requirements of the European Directive (92/43/EEC) on the Conservation of Natural Habitats and Wild Flora and Fauna [The Habitats Directive] which aims to protect the habitats and species of European nature conservation importance. The Directive establishes a network of internationally important sites designated for their ecological status. These are referred to as European sites or Natura 2000 sites, and comprise Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) which are designated under European Directive (2009/147/EC) on the conservation of wild birds [the Birds Directive]. In this report they are henceforth referred to as Natura 2000 sites.
- 2.1.5 SACs and SPAs were included as designations referred to in the NPPF (paragraph 2.11 above). In addition, the NPPF<sup>1</sup> also requires that Ramsar sites (which support internationally important wetland habitats and are listed under the Convention on Wetlands of International Importance [Ramsar Convention]) are included within the HRA process as required by the Regulations.
- 2.1.6 The process of HRA is based on the precautionary principle and evidence should be presented to allow a determination of whether the impacts of a land-use plan, when considered in combination with the effects of other plans and projects against the conservation objectives of a Natura 2000 site; would adversely affect the integrity of that site. Where effects are considered uncertain, the potential for adverse impacts should be assumed. Whether those effects reach a threshold where they can be considered 'significant' has to be interpreted using objective information and best ecological knowledge. Neighbourhood plans are nested within Local Plans. HRA identifies whether a plan is likely to have a significant effect on the integrity of a Natura 2000 site's conservation objectives because it may adversely impact the qualifying features listed, either alone or in combination with other plans or projects. This assessment must determine whether significant effects on a Natura 2000 site can be ruled out on the basis of objective information<sup>2</sup>. Neighbourhood Plans must therefore be considered in combination with the Bedford Borough Local Plan 2030.

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<sup>1</sup>[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/740441/National\\_Planning\\_Policy\\_Framework\\_web\\_accessible\\_version.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/740441/National_Planning_Policy_Framework_web_accessible_version.pdf)

<sup>2</sup> <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal#neighbourhood-plan-require-sustainability-appraisal>  
Paragraph: 047 Reference ID: 11-046-20150209

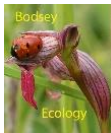


- 2.1.7 It is important to recognise that this HRA deals exclusively with the requirements of the Habitats Regulations 2017, which in turn are concerned only with sites designated for their importance at the European level. It is not a comprehensive review of interactions of the Bedford Borough Local Plan 2030 with biodiversity and important components such as SSSIs, Local Wildlife Sites, Green Infrastructure and Protected Species and Habitats of Principal Importance that are included within the Sustainability Appraisal for that plan.

### 3 AA STAGE 1 – SCREENING METHODOLOGY

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- 3.1.1 The methodology for this Appropriate Assessment (AA) stage 1 of the Harrold Neighbourhood Plan is an extension of that used for the HRA for the Bedford Borough Local Plan 2030 (Bodsey Ecology 2018).
- 3.1.2 The HRA for the Bedford Borough Local Plan 2030 considered the following possible threats identified through pre-screening:
- Increased public recreation, causing disturbance to birds, damage to vegetation, increased littering / flytipping or leading to management compromises (e.g. grazing being restricted).
  - Air pollution, air-borne pollutants
  - Human induced changes in hydraulic conditions
  - Invasive non-native species
  - Pollution to groundwater (point sources and diffuse sources)
  - Reduction in water quality, from increased discharges of sewage and surface water drainage, or from pollution incidents, either during or after construction.
  - Disruption to the flight paths of birds and mammals.
- 3.1.3 The threats were assessed for a number of Natura 2000 sites that are geographically connected by environmental pathways to Bedford Borough. The site objectives of each Natura 2000 site were considered at this stage for Harrold (Appendix 1) in order to determine if there were ecological pathways that could connect the Harrold Neighbourhood Plan to the Natura 2000 sites. The seven Natura 2000 sites were: Portholme SAC; The Ouse Washes SAC/SPA/Ramsar; The Wash SPA/Ramsar; Upper Nene Valley Gravel Pits SPA/Ramsar; The Nene Washes SAC/SPA/Ramsar; Eversden and Wimpole Woods SAC; Chilterns Beechwoods SAC. The AA stage 1 for the Bedford Borough Local Plan 2030 demonstrated that there would be no likely significant effects on all but Portholme SAC and The Ouse Washes SAC/SPA/Ramsar.
- 3.1.4 The threat from “Air pollution, air borne pollutants” was screened out of the Bedford Borough Local Plan 2030 because none of the Natura 2000 sites were close enough to Bedford Borough for there to be an effect and extra road-use would mostly avoid the main routes passing close by the Upper Nene Gravel Pits SPA because there are more direct routes from Bedford to major national routes. Therefore, this threat will not be considered in any Appropriate Assessment for Neighbourhood Plans within Bedford Borough.



- 3.1.5 The conclusions of the full appropriate assessment for the HRA of the Bedford Borough Local Plan 2030 were:

*Climate change impacts on flows and therefore flooding in the River Great Ouse catchment are predicted to be much larger than impacts from urban developments in the long-term. However, protection from urbanisation should not be omitted because of this as it is still a likely significant effect. It is assumed policies in The Local Plan will be followed and permission will only be given to development by the consenting bodies on the understanding that there will not be increased output of pollutants from water recycling centres into the River Great Ouse.*

*The Local Plan in isolation or in combination with the Huntingdonshire Local Plan to 2036 and Central Bedfordshire "Shaping where you live 2035" should not have adverse effects on the two identified Natura 2000 sites on the River Great Ouse assuming policies are followed, although it should be stated that there are not HRA tasks 2 and 3 available from other Local Authorities in the catchment.*

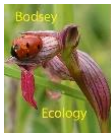
*This HRA finds that as it stands The Local Plan could have significant effects on two of the sites, Portholme (SAC) and The Ouse Washes (SAC/SPA/Ramsar). Portholme (SAC) and The Ouse Washes (SAC) could be affected by a reduction in the quality of flood water. The Ouse Washes (SPA/Ramsar) could be affected by increased flooding. The effects could be avoided by rewording and subsequent adherence to policies and with Anglian Water following its commitments and any findings of future HRA of its Asset Management Plans or other plans.*

*The HRA concludes that, if policies identified as key in this report are retained, and/or the wording changes recommended for policies highlighted are adopted, The Local Plan will not have adverse effects on site integrity of any European site. Therefore, Bedford Borough Council can proceed with The Local Plan 2030 in the context of Habitats Regulations 2017.*

- 3.1.6 Since the HRA (Bodsey Ecology, 2018), the Local Plan 2030 has been updated, policies have been modified and the concerns of the HRA have been met. The changes made that were included in the adopted Local Plan 2030 and their impact on the HRA are covered in an addendum to the HRA (Bodsey Ecology, 2019).

## 4 AA STAGE 1 - RESULTS

- 4.1.1 The screening matrix between the threats listed in paragraph 3.1.2 and the Natura 2000 sites listed in paragraph 3.1.3 for the Harrold Neighbourhood Plan is shown in Table 1.
- 4.1.2 The results of the screening showed that there are possible likely significant effects on the Portholme SAC and The Ouse Washes SAC/SPA/Ramsar. Subsequent analysis showed which of the qualifying features of those Natura 2000 sites might be affected by the threats and whether these adverse effects would lead to a loss of site integrity (these are summarised in Table 2) and are based on the site objectives (Appendix 1). Non-native invasive species are a likely effect because seeds and vegetative parts of plants capable of regeneration could escape from gardens and be transported down the River Great Ouse. Cumulatively across the whole of the River Great Ouse catchment the threat that non-native invasive species (some as yet unidentified or even present in the UK) remains very small and unquantifiable using evidence or with best ecological knowledge. Arguably, the escape of non-native invasive species cannot be discounted for any plan anywhere in England, UK or even the European Union below the threshold of 1 in 500,000 per year (as suggested by DTA Publications Limited, 2018 as being *de minimis*). However, this author believes in his expert opinion that the statement from the Advocate General in Sweetman



*'48 the requirement that the effect in question should be significant exists to lay down a de minimis threshold. Plans or projects that have no appreciable effect on the site are thereby excluded. If all plans or projects capable of having any effect whatsoever on the site were to be caught by Article 6(3), activities on or near the site would risk being impossible by reason of legislative overkill'.*

is pertinent because no development anywhere could take place with the threshold of 1 in 500,000 per year for the spread of invasive non-native species. This author suggests that the criteria for a causal link between plans or projects and Natura 2000 sites should be based on the presence of existing invasive non-native species in the plan or project area and/or projects that suggest non-native planting will take place as part of the project.

- 4.1.3 Pollution of groundwater and Reduction in water quality could have likely significant effects from pollution incidents emanating from new housing before, during or after construction.
- 4.1.4 In determining the likelihood of significant impacts, and hence the need for an appropriate assessment, mitigation measures (i.e. measures to avoid or reduce negative effects) cannot be taken into account. This is confirmed by the European Court of Justice in its ruling in case C-323/17 (commonly known as "People Over Wind"): 'Article 6(3) of Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora must be interpreted as meaning that, in order to determine whether it is necessary to carry out, subsequently, an appropriate assessment of the implications, for a site concerned, of a plan or project, it is not appropriate, at the screening stage, to take account of the measures intended to avoid or reduce the harmful effects of the plan or project on that site'<sup>3</sup> Reversing the logic of this statement, a consequence of "People Over Wind" is that no Natura 2000 site can be screened out at AA stage 1 if there are likely significant effects identified from the perceived threats that come from an analysis of the plan in question, even if there are avoidance or mitigation steps put in place. However, perceived threats can be screened out if there is, on inspection, no chance of a likely significant effect on any Natura 2000 site because there is not actually a causal link. An example of this would be the potential threat from water pollution to the Natura 2000 sites on the River Nene, as the catchment is partly within Bedford Borough. On inspection, there is no development proposed in that part of Bedford Borough, i.e. the River Nene catchment, and so there is no causal link between the threat and the Natura 2000 sites and therefore no likely significant effect. That threat can be screened out for the Natura 2000 sites along the River Nene. "The People Over Wind" ruling means that although the Bedford Borough Local Plan 2030 policies have been reworded to mitigate against the likely significant effects (identified in the HRA (Bodsey Ecology, 2018)) at the scale of Bedford Borough it is assumed that they cannot be screened out at the finer scale of the Harrold Neighbourhood Plan.

## REASONING FOR TABLE 1 RESULTS

1. The Bedford Borough Local Plan 2030 in its entirety is predicted to have no adverse impact on the integrity of the Natura 2000 sites in question for this threat (Bodsey Ecology, 2018).
2. The Harrold Neighbourhood Plan includes provision for 30 homes and this is not large enough to have a measurable effect on the hydrology of the River Great Ouse but in combination with all other developments along the River it could affect the Natura 2000 sites downstream. The in combination impacts of all developments in the River Great Ouse catchment are dependant on the plans of Anglian Water which are themselves subject to an HRA. It can only be assumed for this HRA that the plans of Anglian Water will prevent effects on the Natura 2000 sites in question.
3. It is possible that non-native species could escape from new gardens and be dispersed along the River Great Ouse to Portholme and/or The Ouse Washes. Although the risk is small and is almost

<sup>3</sup><http://curia.europa.eu/juris/document/document.jsf?text=&docid=200970&pageIndex=0&doclang=en&mode=req&dir=&occ=first&part=1>



unmeasurable it is still a possible significant effect that requires further attention. The Harrold Neighbourhood Plan is not connected by river to the Nene Washes or the Upper Nene Valley Gravel Pits and so there is no threat. There is no tangible connection between the Harrold Neighbourhood Plan and Eversden and Wimpole Woods or the Chilterns Beechwoods that would allow the dispersal of propagules and therefore there is no threat.

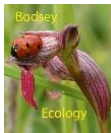
4. The same connections (or lack of them) between Harrold Neighbourhood Plan and the River Great Ouse as for reason “3” apply for pollution incidents to ground water.
5. The same connections (or lack of them) between Harrold Neighbourhood Plan and the River Great Ouse as for reason “3” apply for pollution incidents.
6. No dwelling in Harrold Neighbourhood Plan will be tall enough or close enough to have an effect on flyways for birds or mammals and therefore there is no threat.

Table 1. Screening of Natura 2000 sites for likely significant effects from threats identified from the Harrold Neighbourhood Plan.

Natura 2000 Site	Public Recreation	Human induced changes in hydraulic conditions	Non-native invasive Species	Pollution of Ground Water	Reduction in water Quality	Disruption to flight paths of animals
Portholme SAC	No	Possible	Possible	Possible	Possible	No
Ouse Washes SAC/SPA/RAMSAR	No	Possible	Possible	Possible	Possible	No
Nene Washes (SAC/SPA/RAMSAR)	No	No - too small	No - not connected	No - not connected	No - not connected	No
Eversden and Wimpole Woods (SAC)	No	No - too small	No - not connected	No - not connected	No - not connected	No
The Wash (SPA/RAMSAR)	No	No - too small	No	No	No	No
Upper Nene Valley Gravel Pits (SPA/RAMSAR)	No	No - too small	No - not connected	No - not connected	No - not connected	No
Chilterns Beechwoods	No	No - too small	No	No	No	No
Reason	1	2	3	4	5	6

## 5 AA STAGE 1 - CONCLUSIONS

- 5.1.1 The Harrold Neighbourhood Plan will have no unforeseen likely significant effects on the qualifying features of the two Natura 2000 sites identified in addition to those identified in the HRA of the Bedford Borough Local Plan 2030 (Bodsey Ecology, 2018).
- 5.1.2 The developments included in the Harrold Neighbourhood Plan could contribute to the likely significant effects on qualifying features of the Natura 2000 sites already identified as possible in the HRA of the Bedford Borough Local Plan 2030. All sites close to the River Great Ouse require an appropriate assessment to ascertain that avoidance and mitigation measures are sufficient to prevent any significant effects.

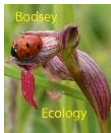


**Table 2. Summary of impacts on Natura 2000 site integrity of the Harrold Neighbourhood Plan and reference required to remove them.**

Natura 2000 Site	Qualifying Feature	Impacted negatively with potential loss of site integrity	Relevant to Harrold Neighbourhood Plan
Portholme SAC	H6510 Lowland hay Meadow	Reduction in water quality	Yes – make reference to BBC Local Plan Policies 92 and 93
		Increased spring/ summer flooding	Yes – make reference to BBC Local Plan Policies 92 and 93
Ouse Washes SPA/ RAMSAR	A051 <i>Anas strepera</i> , Gadwal (breeding)	Increased spring/ summer flooding	Yes – make reference to BBC Local Plan Policies 92 and 93
	A056 <i>Anas querquedula</i> , Garganey (breeding)	Increased winter flooding	Yes – make reference to BBC Local Plan Policies 92 and 93
	A119 <i>Porzana porzana</i> , Spotted Crake (breeding)		Yes – make reference to BBC Local Plan Policies 92 and 93
	A156a <i>Limosa limosa</i> , Black-tailed Godwit (breeding)		Yes – make reference to BBC Local Plan Policies 92 and 93
	Breeding Bird Assemblage (breeding)		Yes – make reference to BBC Local Plan Policies 92 and 93
	A082 <i>Circus cyaneus</i> , Hen Harrier (non-breeding)		Reduction in water quality
Ouse Washes SAC	S1149 <i>Cobitis taenia</i> (Spined Loach)	Reduction in water quality	Yes – make reference to BBC Local Plan Policies 92 and 93

## 6 AA STAGE 2 - APPROPRIATE ASSESSMENT

- 6.1.1 Screening (Table 1) has determined that the Harrold Neighbourhood Plan could add to the likely significant effects of the Bedford Borough Local Plan 2030 and those of other district councils in the River Great Ouse catchment on the Natura 2000 sites at Portholme SAC and The Ouse Washes SAC/SPA/Ramsar.
- 6.1.2 Each of the policies in the document “Harrold Neighbourhood Plan” (Version V4, February 2020) were reviewed. Secondly, the impact of the policies on the threats listed above in paragraph 3.1.2 were evaluated. The following criteria were used in the evaluation:
- 1 Could the policy possibly cause or alter likely significant effects of any of the threats to the Natura 2000 sites.
  - 2 Would the significant effects be positive or negative



- 3 Does the wording of the policy mean that the significant effects will be either avoided or mitigated against if the policy is followed. Noting that at this stage a likely significant effect or Natura 2000 site can be 'discounted and removed' from the Appropriate Assessment if the current policy will mitigate or avoid the adverse impacts on the qualifying features, and there will be no loss of site integrity.
  - 4 Does rewording of the policy allow for significant effects on site integrity of the Natura 2000 sites to be avoided or mitigated against. If the answer is "no" then adverse impacts on site integrity might be a result of the plan if it went ahead (which it should not).
- 6.1.3 Using these criteria the following pathway was followed:
- The answer to criterion 1 could be "yes" or "no".
  - If the answer to criterion 1 was "yes" then the answer to criterion 2 could be "positive" or "negative".
  - If the answer to criterion 2 was "negative" the answer to criterion 3 could be "yes" or "no".
  - If the answer to criterion 3 was "no" then the answer to criterion 4 could be "yes" or "no".
- 6.1.4 For each policy a written reason for the conclusion was added. The results are presented in full in Appendix 2.
- 6.1.5 Note that if any policy or aspect of a plan could lead to adverse impacts on Natura 2000 site integrity the plan should not go forward to adoption. In this rare circumstance, if the plan is to go ahead it would have to have 'imperative reasons of overriding national interest' and compensatory projects would have to be put in place.

## 7 AA STAGE 2 - RESULTS

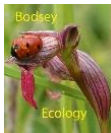
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- 7.1.1 As they stand the policies do not adequately protect the Natura 2000 sites at Portholme SAC or The Ouse Washes SAC/SPA/Ramsar (Appendix 2). The site objectives of the two Natura 2000 sites will not be compromised and there will be no loss of site integrity if the avoidance steps that are recommended in the next section are followed.

## 8 AA STAGE 3 – AVOIDANCE AND MITIGATION

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- 8.1.1 The text in the Harrold Neighbourhood Plan Version V4 is inadequate to ensure protection of the Natura 2000 sites Portholme SAC and The Ouse Washes SAC/SPA/Ramsar and does not fulfil the requirements of the Habitat Regulations 2017. The following additions and rewording of the text and policies of the Harrold Neighbourhood Plan are recommended to ensure that the examiner is made aware that the potential for likely significant effects on Natura 2000 sites has been evaluated and that avoidance or mitigation measures are in place to avoid a loss of site integrity.
- 8.1.2 The key to achieving a standard that will follow the Habitat Regulations is to protect the River Great Ouse. Although the developments in Harrold will be small scale the Habitat Regulations state that all developments in combination with all others must be considered and therefore the standards in Harrold must conform to the standards suggested in the Bedford Local Plan 2030. To protect the River Great Ouse the following policies are required from the Bedford Borough Local Plan 2030: 43S, 44, 45, 52S, 96 and 97. Version 4.0 Of the Harrold Neighbourhood Plan does not include policies 45 and 97 on page 14 and these must be added.
- 8.1.3 "General conformity" to the policies of the adopted Bedford Borough Local Plan 2030, as stated on page 12 of Version 4 is not adequate to ensure the Habitat Regulations 2017 are met. The Harrold Neighbourhood Plan must at least 'adhere' to the policies listed in paragraph 8.1.2.
- 8.1.4 Under Core Objective 3, Sub-Objective 3 should be altered so that it includes the protection of the Natura 2000 sites downstream on the River Great Ouse. This can be most easily achieved by



- adding “ and international” after “special” and also by adding the phrase “in the wider landscape that are connected to the [parish/village/local area]” to the end of the sub-objective.
- 8.1.5 Unusually for a neighbourhood Plan there is no specific policy for biodiversity and wildlife. Probably the easiest way to overcome this omission is by adding to the text relating to Policy HNP5 “Harrold Village Design Statement”. A new paragraph 3.2.15 could read:  
*“The natural environment will be protected, guided by policies 43S, 44, 45, 52S, 96 and 97 of the Bedford Borough Local Plan 2030, through all new developments from construction through to removal. In particular the developments will conform to the Habitat Regulations 2017 by ensuring that the River Great Ouse will be protected and subsequently the Natura 2000 sites downstream of Harrold (Portholme SAC and The Ouse Washes SAC/SPA/Ramsar) will not suffer detrimental effects to their qualifying features and/or loss of site integrity.”*
- 8.1.6 Within Policy HNP5 it would be desirable to state that no building will be built that is over three storeys high. This will ensure no flight path disruption to birds and bats.
- 8.1.7 The addition of a few words to policy HNP7 will ensure the protection of the River Great Ouse is acknowledged. For example, the words “and to protect the environment” after “...needs of the occupiers of the development” would be appropriate. The exact wording is left to the Harrold Development Plan Steering Group.
- 8.1.8 An extra sub-clause should be added to policy HNP12 that reads “shall not adversely affect the environment, specifically water quality of the River Great Ouse”. This policy should also refer to policy HNP5.
- 8.1.9 Should the Harrold Neighbourhood Plan steering group add further policies, notably one for wildlife and biodiversity, the avoidance and mitigation measures suggested above will require further assessment in a brief addendum to this report.

## 9 CONCLUSIONS

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- 9.1.1 There are likely significant effects to the Natura 2000 sites of Portholme SAC and The Ouse Washes SAC/SPA/Ramsar from the Harrold Neighbourhood Plan Version 4, reviewed for this HRA but only in combination with other plans.
- 9.1.2 With the addition of new wording that addresses possible impacts on The River Great Ouse in the Harrold Neighbourhood Plan (Version V4, 18 February 2020), the likely significant effects can be avoided or mitigated against, meaning there are no adverse impacts on qualifying features or site integrity of Natura 2000 sites, assuming other local plans and neighbourhood plans (adopted and emerging) in the catchment of The River Great Ouse similarly avoid or mitigate against the same likely significant effects.
- 9.1.3 The avoidance of the impacts of increased flooding and pollution in the River Great Ouse depends on the efficacy of Anglian Water’s Water Recycling Centres. The assumption has to be made that future HRAs for strategic plans of Anglian Water show that flooding and pollution are avoided or mitigated against. The future plans of Anglia Water also need to ensure that there will be an adequate supply of water for the development (and all other plans in the region) and that this will not reduce the flow of the River Great Ouse to an extent where the integrity of the Natura 2000 sites is affected. This HRA has to assume that the future plans relating to supply will not affect river flow.
- 9.1.4 There is no reason arising from this Habitat Regulations Assessment to prevent the Harrold Neighbourhood Plan from being adopted in the context of the Habitat Regulations 2017.

## 10 REFERENCES

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Bedford Borough Local Plan 2030. [www.bedford.gov.uk/planning-and-building/planning-policy-its-purpose/local-plan](http://www.bedford.gov.uk/planning-and-building/planning-policy-its-purpose/local-plan). Accessed 18<sup>th</sup> April 2020.



Bodsey Ecology (2018). *Bedford Borough Local Plan Habitat Regulations Assessment 2018*. Accessed on 4/10/2018 at <http://edrms.bedford.gov.uk/OpenDocument.aspx?id=mWdUC1eYtKneHtAkS7KPeQ%3d%3d&name=26%20-%20Habitats%20Regulations%20Assessment%202018.pdf>

Bodsey Ecology (2019). Addendum to the Habitat Regulations Assessment for the Bedford Borough Local Plan 2030. Accessed on 29/8/2019 at <https://edrms.bedford.gov.uk/OpenDocument.aspx?id=EOaR5U8lZ83mGGKIOyKHtw%3d%3d&name=Habitat%20Regulations%20Assessment%20Addendum.pdf>



## APPENDIX 1 – EUROPEAN SITE OBJECTIVES

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### EUROPEAN SITE CONSERVATION OBJECTIVES FOR PORTHOLME SPECIAL AREA OF CONSERVATION SITE CODE: UK0030054

With regard to the SAC and the natural habitats and/or species for which the site has been designated (the ‘Qualifying Features’ listed below), and subject to natural change;

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of qualifying natural habitats
- The structure and function (including typical species) of qualifying natural habitats, and
- The supporting processes on which qualifying natural habitats rely

#### Qualifying Features:

H6510. Lowland hay meadows (*Alopecurus pratensis*, *Sanguisorba officinalis*)

### EUROPEAN SITE CONSERVATION OBJECTIVES FOR OUSE WASHES SPECIAL AREA OF CONSERVATION SITE CODE: UK0013011

With regard to the natural habitats and/or species for which the site has been designated (the ‘Qualifying Features’ listed below), and subject to natural change;

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of the habitats of qualifying species
- The structure and function of the habitats of qualifying species
- The supporting processes on which the habitats of qualifying species rely
- The populations of qualifying species, and,
- The distribution of qualifying species within the site.

#### Qualifying Features:

S1149. *Cobitis taenia*; Spined loach



## EUROPEAN SITE CONSERVATION OBJECTIVES FOR OUSE WASHES SPECIAL PROTECTION AREA SITE CODE: UK9008041

With regard to the SPA and the individual species and/or assemblage of species for which the site has been classified (the 'Qualifying Features' listed below), and subject to natural change;

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;

- The extent and distribution of the habitats of the qualifying features
- The structure and function of the habitats of the qualifying features
- The supporting processes on which the habitats of the qualifying features rely
- The population of each of the qualifying features, and,
- The distribution of the qualifying features within the site.

### Qualifying Features:

A037 *Cygnus columbianus bewickii*; Bewick's swan (Non-breeding)

A038 *Cygnus cygnus*; Whooper swan (Non-breeding)

A050 *Anas penelope*; Eurasian wigeon (Non-breeding)

A051 *Anas strepera*; Gadwall (Breeding)

A052 *Anas crecca*; Eurasian teal (Non-breeding)

A053 *Anas platyrhynchos*; Mallard (Breeding)

A054 *Anas acuta*; Northern pintail (Non-breeding)

A055 *Anas querquedula*; Garganey (Breeding)

A056 *Anas clypeata*; Northern shoveler (Non-breeding)

A056 *Anas clypeata*; Northern shoveler (Breeding)

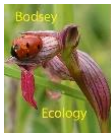
A082 *Circus cyaneus*; Hen harrier (Non-breeding)

A151 *Philomachus pugnax*; Ruff (Breeding)

A156a *Limosa limosa limosa*; Black-tailed godwit (Breeding)

Waterbird assemblage

Breeding bird assemblage



## EUROPEAN SITE CONSERVATION OBJECTIVES FOR THE WASH AND NORTH NORFOLK COAST SPECIAL AREA OF CONSERVATION SITE CODE: UK0017075

With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of qualifying natural habitats and habitats of qualifying species
- The structure and function (including typical species) of qualifying natural habitats
- The structure and function of the habitats of qualifying species
- The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely The populations of qualifying species, and,
- The distribution of qualifying species within the site.

### Qualifying Features:

H1110. Sandbanks which are slightly covered by sea water all the time; Subtidal sandbanks

H1140. Mudflats and sandflats not covered by seawater at low tide; Intertidal mudflats and sandflats

H1150. Coastal lagoons\*

H1160. Large shallow inlets and bays

H1170. Reefs

H1310. Salicornia and other annuals colonising mud and sand; Glasswort and other annuals colonising mud and sand

H1330. Atlantic salt meadows (*Glauco-Puccinellietalia maritimae*)

H1420. Mediterranean and thermo-Atlantic halophilous scrubs (*Sarcocornetea fruticosi*); Mediterranean saltmarsh scrub

S1355. *Lutra lutra*; Otter

S1365. *Phoca vitulina*; Common seal

## EUROPEAN SITE CONSERVATION OBJECTIVES FOR THE WASH SPECIAL PROTECTION AREA SITE CODE: UK9008021

With regard to the SPA and the individual species and/or assemblage of species for which the site has been classified (the 'Qualifying Features' listed below), and subject to natural change;

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;

- The extent and distribution of the habitats of the qualifying features
- The structure and function of the habitats of the qualifying features ☐ The supporting processes on which the habitats of the qualifying features rely
- The population of each of the qualifying features, and,
- The distribution of the qualifying features within the site.





### Qualifying Features:

- A037 *Cygnus columbianus bewickii*; Bewick's swan (Non-breeding)
- A040 *Anser brachyrhynchus*; Pink-footed goose (Non-breeding)
- A046a *Branta bernicla bernicla*; Dark-bellied brent goose (Non-breeding)
- A048 *Tadorna tadorna*; Common shelduck (Non-breeding)
- A050 *Anas penelope*; Eurasian wigeon (Non-breeding)
- A051 *Anas strepera*; Gadwall (Non-breeding)
- A054 *Anas acuta*; Northern pintail (Non-breeding)
- A065 *Melanitta nigra*; Black (common) scoter (Non-breeding)
- A067 *Bucephala clangula*; Common goldeneye (Non-breeding)
- A130 *Haematopus ostralegus*; Eurasian oystercatcher (Non-breeding)
- A141 *Pluvialis squatarola*; Grey plover (Non-breeding)
- A143 *Calidris canutus*; Red knot (Non-breeding)
- A144 *Calidris alba*; Sanderling (Non-breeding)
- A149 *Calidris alpina alpina*; Dunlin (Non-breeding)
- A156 *Limosa limosa islandica*; Black-tailed godwit (Non-breeding)
- A157 *Limosa lapponica*; Bar-tailed godwit (Non-breeding)
- A160 *Numenius arquata*; Eurasian curlew (Non-breeding)
- A162 *Tringa totanus*; Common redshank (Non-breeding)
- A169 *Arenaria interpres*; Ruddy turnstone (Non-breeding)
- A193 *Sterna hirundo*; Common tern (Breeding)
- A195 *Sterna albifrons*; Little tern (Breeding)
- Waterbird assemblage

### EUROPEAN SITE CONSERVATION OBJECTIVES FOR EVERS DEN AND WIMPOLE WOODS SPECIAL AREA OF CONSERVATION SITE CODE: UK0030331

With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of the habitats of qualifying species
- The structure and function of the habitats of qualifying species
- The supporting processes on which the habitats of qualifying species rely
- The populations of qualifying species, and,
- The distribution of qualifying species within the site.



This document should be read in conjunction with the accompanying Supplementary Advice document, which provides more detailed advice and information to enable the application and achievement of the Objectives set out above and is found at <http://publications.naturalengland.org.uk/publication/6736081810620416>.

### Qualifying Features:

S1308. *Barbastella barbastellus*; *Barbastelle* bat

## EUROPEAN SITE CONSERVATION OBJECTIVES FOR UPPER NENE VALLEY GRAVEL PITS SPECIAL PROTECTION AREA SITE CODE: UK9020296

With regard to the SPA and the individual species and/or assemblage of species for which the site has been classified (the 'Qualifying Features' listed below), and subject to natural change;

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;

- The extent and distribution of the habitats of the qualifying features
- The structure and function of the habitats of the qualifying features
- The supporting processes on which the habitats of the qualifying features rely
- The population of each of the qualifying features, and, ☐ The distribution of the qualifying features within the site.

This document should be read in conjunction with the accompanying Supplementary Advice document, which provides more detailed advice and information to enable the application and achievement of the Objectives set out above. It is available at <http://publications.naturalengland.org.uk/publication/5495529882517504>

### Qualifying Features:

A021 *Botaurus stellaris*; Great bittern (Non-breeding)

A051 *Anas strepera*; Gadwall (Non-breeding)

A140 *Pluvialis apricaria*; European golden plover (Non-breeding)

Waterbird assemblage

## EUROPEAN SITE CONSERVATION OBJECTIVES FOR NENE WASHES SPECIAL PROTECTION AREA SITE CODE: UK9008031

With regard to the SPA and the individual species and/or assemblage of species for which the site has been classified (the 'Qualifying Features' listed below), and subject to natural change;

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;

- The extent and distribution of the habitats of the qualifying features
- The structure and function of the habitats of the qualifying features
- The supporting processes on which the habitats of the qualifying features rely
- The population of each of the qualifying features, and,
- The distribution of the qualifying features within the site.



### Qualifying Features:

- A037 *Cygnus columbianus bewickii*; Bewick's swan (Non-breeding)
- A050 *Anas penelope*; Eurasian wigeon (Non-breeding)
- A051 *Anas strepera*; Gadwall (Breeding)
- A051 *Anas strepera*; Gadwall (Non-breeding)
- A052 *Anas crecca*; Eurasian teal (Non-breeding)
- A054 *Anas acuta*; Northern pintail (Non-breeding)
- A055 *Anas querquedula*; Garganey (Breeding)
- A056 *Anas clypeata*; Northern shoveler (Non-breeding)
- A056 *Anas clypeata*; Northern shoveler (Breeding)
- A156a *Limosa limosa limosa*; Black-tailed godwit (Breeding)

## EUROPEAN SITE CONSERVATION OBJECTIVES FOR CHILTERN BEECHWOODS SPECIAL AREA OF CONSERVATION SITE CODE: UK0012724

With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of qualifying natural habitats and habitats of qualifying species
- The structure and function (including typical species) of qualifying natural habitats
- The structure and function of the habitats of qualifying species
- The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely
- The populations of qualifying species, and,
- The distribution of qualifying species within the site.

This document should be read in conjunction with the accompanying Supplementary Advice document, which provides more detailed advice and information to enable the application and achievement of the Objectives set out above. This is available at <http://publications.naturalengland.org.uk/publication/4808896162037760>

### Qualifying Features:

- H6210. Semi-natural dry grasslands and scrubland facies: on calcareous substrates (*FestucoBrometalia*); Dry grasslands and scrublands on chalk or limestone
- H9130. *Asperulo-Fagetum* beech forests; Beech forests on neutral to rich soils
- S1083. *Lucanus cervus*; Stag beetle



## APPENDIX 2 – RESULTS OF THE ASSESSMENT OF POLICIES

Criteria 1 and 2 of the appropriate assessment (AA Stage 2)

Could Likely Significant Effects Occur Because of Policy								
Policy Number	Policy Title	Increased Public Recreation	Human induced changes in hydraulic conditions	Invasive non-native species	Pollution to groundwater	Reduction in water quality	Disruption to flight paths	Reason
Objective 1	To influence the location, scale, design and type of new housing to ensure that it fits with the distinctive character of Harrold's built heritage and meets identified local housing needs	No	Yes	Yes	Yes	Yes	No	Sub-objective 4 refers to policy HNP5 but this does not protect the River Great Ouse.
Objective 2	To promote infrastructure improvements (such as improved traffic management, car parking, pedestrian walking and cycle routes) needed to support new development and to encourage safe and accessible movement for pedestrians, cyclists, motorists and public transport.	No	No	No	No	No	No	
Objective 3	To protect the place defining characteristics of Harrold's special local environment and enriched countryside and to ensure that new development contributes to the open space needs of the local community and preserves the natural features in the distinctive landscape	No	Yes	Yes	Yes	Yes	No	Sub-objective 3 mentions biodiversity but does not refer to a policy (there is not one for biodiversity) and does not refer to the protection of biodiversity in the wider countryside ie The Natura 2000 sites
Objective 4	To maintain and improve local facilities, amenities and services which provide a community focus and help sustain the vitality, health and quality of life of all residents.	No	No	No	No	No	No	



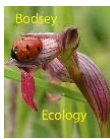
Criteria 1 and 2 of the appropriate assessment (AA Stage 2) – continued

Policy Number	Policy Title	Increased Public Recreation	Human induced changes in hydraulic conditions	Invasive non-native species	Pollution to groundwater	Reduction in water quality	Disruption to flight paths	Reason
Objective 5	To protect and strengthen the economic benefits of harrold as a rural service area and to encourage and support local business and local measures to improve employment prospects in the village.	No	Yes	Yes	Yes	Yes	No	Sub-objective 2 allows for building on brownfield sites but these could still allow pollution or impacts on the River Great Ouse if in the wrong place.
HNP1	General housing needs of the village	No	Yes	Yes	Yes	Yes	Yes	The policy does not refer to protecting the River Great Ouse. It allows for the possibility of tall buildings
HNP2	Land at Odell Road, Harrold	No	Yes	Yes	Yes	Yes	No	Does not protect the Natura 2000 sites because HNP5 is inadequate.
HNP3	Land East of Orchard Lane, Harrold	No	Yes	Yes	Yes	Yes	No	Does not protect the Natura 2000 sites because HNP5 is inadequate.
HNP4	Land at Priory Farm, Harrold	No	Yes	Yes	Yes	Yes	No	Does not protect the Natura 2000 sites because HNP5 is inadequate.
HNP5	Harrold Village design statement	No	Yes	Yes	Yes	Yes	Yes	This policy should include statements that ensure protection of the River Great Ouse or at least refer to the Bedford Borough Local Plan 2030 policies which do.

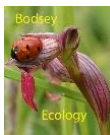


Criteria 1 and 2 of the appropriate assessment (AA Stage 2) - continued

Policy Number	Policy Title	Increased Public Recreation	Human induced changes in hydraulic conditions	Invasive non-native species	Pollution to groundwater	Reduction in water quality	Disruption to flight paths	Reason
HNP6	Heritage assets	No	No	No	No	No	No	
HNP7	Utility services	No	No	No	No	Yes	No	It is not clear that sewerage will be adequately dealt with
HNP8	Financial Contributions	No	No	No	No	No	No	
HNP9	Sustainable Transport	No	No	No	No	No	No	
HNP10	Existing Community facilities	No	No	No	No	No	No	
HNP11	New community and retail facilities	No	No	No	No	No	No	
HNP12	New business uses	No	Yes	Yes	Yes	Yes	Yes	
HNP13	Home businesses	No	No	No	No	No	No	



Criterion 3: Did wording of the policy address the negative likely significant effect in the draft Harrold Neighbourhood Plan of February 2020?							
Policy Number	Policy Title	Increased Public Recreation	Human induced changes in hydraulic conditions	Invasive non-native species	Pollution to groundwater	Reduction in water quality	Disruption to flight paths
Objective 1	To influence the location, scale, design and type of new housing to ensure that it fits with the distinctive character of Harrold's built heritage and meets identified local housing needs		No	No	No	No	
Objective 3	To protect the place defining characteristics of Harrold's special local environment and enriched countryside and to ensure that new development contributes to the open space needs of the local community and preserves the natural features in the distinctive landscape		No	No	No	No	
Objective 5	To protect and strengthen the economic benefits of Harrold as a rural service area and to encourage and support local business and local measures to improve employment prospects in the village.		No	No	No	No	
HNP1	General housing needs of the village		No	No	No	No	
HNP2	Land at Odell Road, Harrold		No	No	No	No	
HNP3	Land East of Orchard Lane, Harrold		No	No	No	No	
HNP4	Land at Priory Farm, Harrold		No	No	No	No	
HNP5	Harrold Village design statement		No	No	No	No	
HNP7	Utility services					No	
HNP12	New business uses		No	No	No	No	No



Criterion 4: Will rewording of the policy in the draft Clapham Neighbourhood Plan of November 2019 avoid or mitigate against the impacts on European sites?							
Policy Number	Policy Title	Increased Public Recreation	Human induced changes in hydraulic conditions	Invasive non-native species	Pollution to groundwater	Reduction in water quality	Disruption to flight paths
Objective 1	To influence the location, scale, design and type of new housing to ensure that it fits with the distinctive character of Harrold's built heritage and meets identified local housing needs		Yes	Yes	Yes	Yes	
Objective 3	To protect the place defining characteristics of Harrold's special local environment and enriched countryside and to ensure that new development contributes to the open space needs of the local community and preserves the natural features in the distinctive landscape		Yes	Yes	Yes	Yes	
Objective 5	To protect and strengthen the economic benefits of Harrold as a rural service area and to encourage and support local business and local measures to improve employment prospects in the village.		Yes	Yes	Yes	Yes	
HNP1	General housing needs of the village		Yes	Yes	Yes	Yes	
HNP2	Land at Odell Road, Harrold		Yes	Yes	Yes	Yes	
HNP3	Land East of Orchard Lane, Harrold		Yes	Yes	Yes	Yes	
HNP4	Land at Priory Farm, Harrold		Yes	Yes	Yes	Yes	
HNP5	Harrold Village design statement		Yes	Yes	Yes	Yes	
HNP7	Utility services					Yes	
HNP12	New business uses		Yes	Yes	Yes	Yes	Yes