



Habitat Regulations Screening for the Renhold Neighbourhood Plan

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TABLE OF CONTENTS

Executive Summary

- 1 The legislative context
- 2 AA Stage 1 – Screening Methodology
- 3 AA Stage 1 – Results
- 4 Reasoning for Results
- 5 AA Stage 1 – Conclusions
- 6 Conclusions

Appendix 1 – European Site Objectives

European Site Conservation Objectives for Portholme Special Area of Conservation

European Site Conservation Objectives for Ouse Washes Special Area of Conservation

European Site Conservation Objectives for Ouse Washes Special Protection Area

European Site Conservation Objectives for The Wash and North Norfolk Coast Special Area of Conservation

European Site Conservation Objectives for The Wash Special Protection Area

European Site Conservation Objectives for Eversden and Wimpole Woods Special Area of Conservation

European Site Conservation Objectives for Upper Nene Valley Gravel Pits Special Protection Area Site

European Site Conservation Objectives for Nene Washes Special Protection Area

European Site Conservation Objectives for Chilterns Beechwoods Special Area of Conservation

1 EXECUTIVE SUMMARY

- 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.
- 1.2 Neighbourhood plans are independent of, but linked to, Local Plans. A HRA must determine whether significant effects on a National Site Network site can be ruled out on the basis of objective information and best scientific knowledge.
- 1.3 Appropriate Assessment for any development plan is a three-stage process: screening; the appropriate assessment itself that identifies whether the integrity of National Site Network sites could be compromised; and alternative solutions that include avoidance and mitigation measures.
- 1.4 The HRA for the Bedford Borough Local Plan 2030 identified likely significant effects on two National Site Network sites, The Ouse Washes (SAC/SPA/Ramsar) and Portholme (SAC), downstream of Bedford. Although the policies within the Local Plan should protect the National Site Network sites if followed, 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.
- 1.5 Screening of the Renhold Neighbourhood Plan (RNP) showed that the likely significant effects on the two National Site Network sites identified in the Bedford Borough Local Plan 2030 are not present. Appropriate assessment (AA Stage 2) was therefore not necessary.
- 1.6 This HRA screening 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 National Site Network sites along it is that those plans will each have their own HRA.
- 1.7 This HRA screening concludes that the Renhold Neighbourhood Plan can proceed as it will not have adverse impacts on any National Site Network 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

- 2.1 Paragraph 185 of the National Policy Planning Framework (December 2023) (NPPF) states that to protect and enhance biodiversity and geodiversity, plans should:
- a) 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
 - b) 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.
- 2.2 In addition to the requirements of the NPPF, the Conservation of Habitats and Species 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 of the implications for the site in view of that site's conservation objectives where:
- 2.3 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
 - 2.4 b) is not directly connected with or necessary to the management of the site (Paragraph 102 of the Habitats Regulations 2017).
- 2.5 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.
- 2.6 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 National Site Network 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.
- 2.7 Neighbourhood plans are nested within Local Plans. HRA identifies whether a plan is likely to have a significant effect on the integrity of a National Site Network site's conservation objectives because it may adversely impact the qualifying features, either alone or in combination with other plans or projects. This assessment must determine whether significant effects on a National Site Network site can be ruled out on the basis of objective information. Neighbourhood Plans must therefore be considered in combination with the Bedford Borough Local Plan 2030.

3 AA STAGE 1 - SCREENING METHODOLOGY

- 3.1 The methodology for this Appropriate Assessment (AA) stage 1 of the Draft Renhold Neighbourhood Plan is based upon the approach adopted for the HRA for the Bedford Borough Local Plan 2030.
- 3.2 The HRA for the Bedford Borough Local Plan 2030 considered the following possible threats identified through pre-screening:
- a) Increased public recreation, causing disturbance to birds, damage to vegetation, increased littering / fly-tipping or leading to management compromises (e.g. grazing being restricted).
 - b) Air pollution, air-borne pollutants.
 - c) Human-induced changes in hydraulic conditions.
 - d) Invasive non-native species.
 - e) Pollution to groundwater (point sources and diffuse sources).
 - f) Reduction in water quality, from increased discharges of sewage and surface water drainage, or from pollution incidents, either during or after construction.
 - g) Disruption to the flight paths of birds and mammals.
- 3.3 The threats were assessed for a number of National Site Network sites that are geographically connected by environmental pathways to Bedford Borough. The site objectives of each National Site Network site were considered at this stage for Renhold (Appendix 1) in order to determine if there were ecological pathways that could connect the Neighbourhood Plan to the National Site Network sites. The seven National Site Network sites were:
- a) Portholme SAC.
 - b) The Ouse Washes SAC/SPA/Ramsar.
 - c) The Wash SPA/Ramsar.
 - d) Upper Nene Valley Gravel Pits SPA/Ramsar.
 - e) The Nene Washes SAC/SPA/Ramsar.
 - f) Eversden and Wimpole Woods SAC.
 - g) Chilterns Beechwoods SAC.
- 3.4 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.
- 3.5 The threat from 'Air pollution, air borne pollutants' was screened out of the Bedford Borough Local Plan 2030 because none of the National Site Network 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.

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

- a) 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.
- b) 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 National Site Network 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.
- c) 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.
- d) The HRA concludes that, if the recommended policies 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.

4 AA STAGE 1 - RESULTS

4.1 The screening matrix between the threats listed in paragraph 3.2 and the National Site Network sites listed in paragraph 3.3 for the Renhold Neighbourhood Plan is shown below:

National Site Network 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	No	No	No	No	No
Ouse Washes SAC/SPA/RAMSAR	No	No	No	No	No	No
Nene Washes (SAC/SPA/RAMSAR)	No	No	No - not connected	No - not connected	No - not connected	No
Eversden and Wimpole Woods (SAC)	No	No	No - not connected	No - not connected	No - not connected	No
The Wash (SPA/RAMSAR)	No	No	No	No	No	No
Upper Nene Valley Gravel Pits (SPA/RAMSAR)	No	No	No - not connected	No - not connected	No - not connected	No
Chilterns Beechwoods	No	No	No	No	No	No
Reason	a	b	c	d	e	f

4.2 The results of the screening showed that there are no likely significant effects on National Site Network sites. The reasons for of this conclusion are as follows:

- a) The Bedford Borough Local Plan 2030 in its entirety is predicted to have no adverse impact on the integrity of the National Site Network sites in question for this threat.
- b) The developments planned for Renhold are not directly linked to the River Great Ouse but are linked to it via the Renhold Brook and so may affect the hydrology which could, when combined with those of all the other developments in the Bedford Borough Local Plan 2030, impact the National Site Network sites downstream. The 'in combination' impacts of all developments in the River Great Ouse catchment are dependent 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 National Site Network sites in question. However, the RNP specifically mentions that the River Great Ouse will be protected under the policies of the Bedford Borough Plan and that this is in part to protect the National Site Network sites downstream.

Renhold Neighbourhood Plan HRA Screening

- c) 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. But the risk is small and is unmeasurable. The area covered by Renhold 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 Renhold Neighbourhood Plan and Eversden and Wimpole Woods or the Chilterns Beechwoods that would allow the dispersal of propagules and therefore there is no threat.
- d) The same connections (or lack of them) between Renhold Neighbourhood Plan and the River Great Ouse as for reason c apply for pollution incidents to ground water.
- e) The same connections (or lack of them) between RNP and the River Great Ouse as for reason c apply for pollution incidents.
- f) No dwelling proposed in the Renhold 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.

4.3 Supplementary analysis shows which of the qualifying features of National Site Network sites might be affected by the threats and whether these adverse effects would lead to a loss of site integrity. These are tabulated below.

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

5 AA STAGE 1 - CONCLUSIONS

- 5.1 The Renhold Neighbourhood Plan will have no unforeseen likely significant effects on the qualifying features of the two National Site Network sites identified in addition to those identified in the HRA of the Bedford Borough Local Plan 2030.
- 5.2 The developments included in the Renhold Neighbourhood Plan will not contribute further to the likely significant effects to National Site Network sites already identified as possible in the HRA of the Bedford Borough Local Plan 2030.

6 CONCLUSIONS

- 6.1 There are no likely significant effects to the National Site Network sites identified as potentially being at risk because the Renhold Neighbourhood Plan specifically mentions that they will be protected under the policies of the Bedford Borough Local Plan 2030.
- 6.2 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 Anglian 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 National Site Network sites is affected. This HRA has to assume that the future plans relating to supply will not affect river flow.
- 6.3 With the assumptions made above there is no reason arising from this Habitat Regulations Assessment to prevent the Renhold Neighbourhood Plan from being adopted in the context of the Habitat Regulations 2017.

APPENDIX 1 – EUROPEAN SITE OBJECTIVES

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: Lowland hay meadows.

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: 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 feature;
- 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:

- Bewick's swan (Non-breeding)
- Whooper swan (Non-breeding)
- Eurasian wigeon (Non-breeding)
- Gadwall (Breeding)
- Eurasian teal (Non-breeding)
- Mallard (Breeding)
- Northern pintail (Non-breeding)
- Garganey (Breeding)
- Northern shoveler (Non-breeding and breeding)
- Hen harrier (Non-breeding)
- Ruff (Breeding)
- 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:

- Sandbanks which are slightly covered by sea water all the time; Subtidal sandbanks
- Mudflats and sandflats not covered by seawater at low tide; Intertidal mudflats and sandflats
- Coastal lagoons
- Large shallow inlets and bays
- Reefs
- Salicornia and other annuals colonising mud and sand; Glasswort and other annuals colonising mud and sand
- Atlantic salt meadows
- Mediterranean and thermo-Atlantic halophilous scrubs; Mediterranean saltmarsh scrub
- Otter
- 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 feature; and
- The distribution of the qualifying features within they sit

Qualifying Features:

- Bewick's swan (Non-breeding)
- Pink-footed goose (Non-breeding)
- Dark-bellied brent goose (Non-breeding)
- Common shelduck (Non-breeding)
- Eurasian wigeon (Non-breeding)
- Gadwall (Non-breeding)
- Northern pintail (Non-breeding)
- Common scoter (Non-breeding)
- Common goldeneye (Non-breeding)
- Eurasian oystercatcher (Non-breeding)
- Grey plover (Non-breeding)
- Red knot (Non-breeding)
- Sanderling (Non-breeding)
- Dunlin (Non-breeding)
- Black-tailed godwit (Non-breeding)
- Bar-tailed godwit (Non-breeding)
- Eurasian curlew (Non-breeding)
- Common redshank (Non-breeding)
- Ruddy turnstone (Non-breeding)
- Common tern (Breeding)
- Little tern (Breeding)
- Waterbird assemblage

European Site Conservation Objectives for Eversden 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.

Qualifying Features:

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; and
- The population of each of the qualifying features, and,
- The distribution of the qualifying features within the site.

Qualifying Features:

- Great bittern (Non-breeding)
- Gadwall (Non-breeding)
- 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:

- Bewick's swan (Non-breeding)
- Eurasian wigeon (Non-breeding)
- Gadwall (Breeding and Non-breeding)
- Eurasian teal (Non-breeding)
- Northern pintail (Non-breeding)
- Garganey (Breeding)
- Northern shoveler (Non-breeding and Breeding)
- Black-tailed godwit (Breeding)

European Site Conservation Objectives for Chilterns 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.

Qualifying Features:

- Semi-natural dry grasslands and scrubland facies on calcareous substrates
- Dry grasslands and scrublands on chalk or limestone
- Beech forests on neutral to rich soils
- Stag beetle.