APPENDIX 4 DETAILED POLICY ASSESSMENT AND MITIGATION

Element of Allocations Plan	Closest Designated site	River Wye	W V Woodlands	Severn Estuary	Walmore Common	WV & FoD Bat Sites	Re-Screening Conclusion	Potential to Mitigate through Avoidance Measures and Policy Measures/safeguards	Residual Effects?
AP17 Stowfield Lydbrook	Borders River Wye SAC.			P	0	Р	Screened In - Proximity to European sites, scale of proposal and past uses. A former cable works at Lydbrook and on the banks of the River Wye SAC. There is potential for development at this site to have direct impacts on the River Wye SAC through habitat loss and fragmentation (loss of vegetation adjacent to river corridor), disturbance (noise, light and vibration) and changes to the water environment (reduced water quality through pollution/contamination impacts and changes to water regimes). (River Wye joins the River Severn hence potential effects) (Park Wood SSSI is on the opposite bank). The site is just upstream from the nearest of the Wye Valley Woodland SAC sites (less than 1.5km). Potential impacts to the Wye Valley Woodlands relate to water quality and disturbance.	As part of the iterative process of HRA and following the preliminary HRA the policy wording for this site has been amended to further strengthen site protection. There are site specific caveats in place that set a framework to ensure all impacts arising from proposals are avoided on mitigated.	No

AP 42 Lydney Harbour

Estuary SAC/SPA and Ramsar

Borders

Severn

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qualifying feature of the bat SACs may be impacted.

Screened In - Proximity to European sites, scale of proposal and past uses

The harbour from the sea gates to the termination of the wider canal section near the railway station together with the surrounding area is identified for tourism and recreational uses.

The site is an existing and active harbour but borders the River Severn. The policy promotes access for walking and cycling as well as the potential for new facilities café, toilets etc. There is an existing cycle track and path to the south of the harbour

River Severn: There is therefore potential for direct habitat loss, and fragmentation (loss of vegetation adjacent to river corridor), disturbance (noise, light and vibration) and changes to the water environment (reduced water quality through pollution/contamination impacts and changes to water regimes).

Wye Valley and Forest of Dean Bat Sites: There is also theoretical potential for fragmentation and lighting impacts to bat flight ways. Whilst Core Strategy Policy 1 provides for protection of designated sites it is recommended the wording in this policy is strengthened. In addition there is a specific issue of increased disturbance. The allocation site is part of a larger complex of sites and proposals in the Lydney Harbour area that could lead to significant effects on the qualifying species of the Estuary.

It is recommended the council make a commitment to working with neighbouring Severn authorities on this issue. The Association of Severn Estuary Relevant Authorities (ASERA) already exists and the District Council is a member of the group, an estuary wide recreational strategy would seem to be the ultimate aim particularly in association with the Environment Agency and Natural England.

It is recommended the following wording is added to the last paragraph of the policy wording of AP42:

Special requirements as set out in "Lydney European Sites" are likely to be required"

In addition the following text box in the general chapter on Lydney should also be added to the policy:

Lydney European Sites

The Severn Estuary is one of the most dramatic such features in the country. It is also with some justification one of the most protected and is a designated SSSI, SAC, SPA and Ramsar site. It shapes the settlements along its banks and is the reason for the existence of many of them. In the case of Lydney the Plan seeks to take advantage of the setting but No. But changes needed

must do so in a manner that ensures the proper protection of the environment which includes the identified nature conservation interests.

One of the constituent sites of the Wye Valley and Forest of Dean Bat SACs is also within 2km of Lydney.

Appropriate consideration of the close proximity of European sites is a key element of proposals within the town and Lydney Harbour. The Policies for the town and harbour will provide for approximate 1700 new dwellings during the life of the plan as well as employment uses on existing sites and new sites. Potential adverse impacts are possible to the European sites from the scale of development proposed. Potential impacts from additional recreation, noise, lighting, and habitat fragmentation are possible as well as impacts to water quality. Given the potential for adverse effects there are special requirements for proposals which may affect the integrity of these sites. Policies in the Lydney area which are relevant particularly relevant include: AP 42, AP43, AP44, AP46 and AP47.

Development proposals will be required to demonstrate that it will not have an adverse effect on the integrity of European sites. All proposals must be compatible with the Habitats Regulations and the conservation status of the estuary and bat sites.

Specific detailed studies are likely to be required to support the planning applications in the Lydney area and are set out below:

Development will need to be laid out and designed in order to avoid adverse effects on the European sites, their qualifying habitats and species. Any new residential units (particularly those associated with AP 43 Pine End Works and Land to the North) should ensure layout separates them from the SAC/SPA/Ramsar site thus avoiding urban pressures.

Employment use such as that associated with AP43, AP 44 and AP47 and should also maximise its separation from the SAC/SPA/Ramsar site given the potential of this type of development to result in noise and other disturbance. Any new facilities associated with the docks and marina must be delivered in such a way as to ensure impacts are avoided. Recreation impacts to the Severn Estuary are a particular concern in relation to AP42 Lydney Harbour and in general terms from the increased population in Lydney.

To demonstrate no adverse effect, planning applications must therefore include:

• A visitor survey of the Severn Estuary SAC/SPA/Ramsar site within the vicinity of Lydney Docks in order to inform an evaluation of what increase in recreational activity in the SAC/SPA/Ramsar site would result (from the presence of new recreational facilities, cycle ways, new employment and housing), and define management interventions required to ensure no adverse effect and form a basis for future monitoring;

• A non-breeding bird survey of the Lydney Docks area in order to identify any parts of the site which currently constitute important habitat for the SPA/Ramsar site bird populations and set out any necessary mitigation;

• A management plan for protecting the natural environment (focussed on the interest features of the SAC/SPA/Ramsar site), particularly with regard to recreational pressure;

• An analysis of construction and operational noise within the SAC/SPA/Ramsar site due to developments in the Lydney Harbour area compared to the current noise baseline and details of any mitigation measures (such as seasonal restrictions on some activities, damping of pile-hammers, or use of close-board fencing during construction) that will be deployed to ensure that disturbance of SPA/Ramsar site birds does not occur;

Careful lighting design, both with regard to security

lighting during construction and permanent lighting during occupation, to ensure no increase in illumination of the SAC/SPA/Ramsar site or of important bat foraging areas of commuting routes. Lighting levels in the site should not exceed levels above the ILP classification E1 (Natural Lighting Zone that is intrinsically dark) for the Severn Estuary and its foreshore;

• Details of potential mitigation measures, such as: identifying and safeguarding foraging areas, flight lines and dark corridors for bats; identifying and securing bird refuge areas within or close to the development area; and of potential on-site management (to mitigate both recreational pressure during the non-breeding period and incidences of fly tipping) that would be undertaken to ensure no adverse effect.

• A sediment contamination assessment as part of any future marina planning application; and

• Landscaping to create appropriate visual and noise buffers between the development and the Severn Estuary SAC SPA/Ramsar site or to bat flight lines and foraging areas."

Whilst the above requirements arise through the implementation of policies outside the AP itself, the consequences of non-compliance could mean development is unable to take place. It is therefore essential that development fully assesses its impacts and that they are shown to not have adverse effects on the integrity of the sites concerned.

Existing Policy wording states (under special requirements)

• All proposals will need to take full account of and be compatible with the estuary, its protected status (SAC) and the Habitats Regulations.

Whilst Core Strategy Policy 1 provides for protection of designated sites it is recommended the wording in this policy is strengthened.

The following changes are recommended:

AP 43 Pine Borders End Works Severn and Land to Estuary the North SAC/SPA and Ramsar

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P Screened In - Proximity to European sites, scale of proposal and past uses

Approx. 10.6 ha of land including the existing Pine End Works as well as arable land is allocated for employment led mixed use. With the emphasis on employment generating uses and leisure and tourism related activities.

River Severn: There is therefore potential for habitat fragmentation (loss of vegetation adjacent

to river corridor), disturbance (noise, light and vibration) and changes to the water environment (reduced water quality through pollution/contamination impacts and changes to water regimes).

Wye Valley and Forest of Dean Bat Sites: There is also theoretical potential for fragmentation and lighting impacts to bat flight ways Change the sentence in the section "Special Requirements" in policy wording:

All proposals will need to take full account of and be compatible with the estuary, its protected status (SAC) and the Habitats Regulations.

То

All proposals will need to take full account of the conservation status of the estuary and be compatible with the Habitats Regulations. Special requirements as set out in "Lydney European Sites" are likely to be required.

Policies with possible in combinatio n effects AP18 1.9km from Taurus Severn Craft Estuary Centre near SAC/SPA Lydney and Ramsar

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Check for likely significant effects in combination
 Existing site: policy reaffirms continued use and

allows for some intensification.

Potential in combination

River Severn: There is potential for changes to the water environment (reduced water quality through pollution/contamination impacts and changes to water regimes).

The site is connected to the River Severn SAC, SPA and Ramsar site via a direct water course (Stockwell Brook).

There are hydrological inks to the Severn and any development at the site must ensure that water

The Appropriate Assessment identified regulatory process (Severn Trent Water, Welsh Water and the Environment Agency) address the majority of the concerns. There are also existing policy safeguards in the Core Strategy, CSP1. - Design and Environmental Protection and CSP2 – Climate Change No. But changes needed

Project Level requirements: For those policies identified as having a potential in-combination impact individual proposals will be required to provide hydrological modelling and/or Construction Environmental Management plans. This is ensured through existing Core Strategy Policies.

It is recommended that for polices identified with potential incombination impacts that additional wording is added to the policies special requirements.

"Development proposals must demonstrate that the treatment

of waste water and any run off can be adequately provided for and that no adverse effects on the integrity of the River Severn SAC, SPA and Ramsar sites result" Check for likely significant effects in combination former colliery site connected to the Cinderford The Appropriate Assessment identified regulatory process changes Brook within Severn Estuary catchment and (Severn Trent Water, Welsh Water and the Environment needed Agency) address the majority of the concerns. There are also connected to the existing policy safeguards in the Core Strategy, CSP1. - Design The policy allocates 3.7ha for employment use. and Environmental Protection and CSP2 - Climate Change The site is in current use and the allocation Project Level requirements: For those policies identified as promotes possible recreational and tourism uses. having a potential in-combination impact individual proposals Former engine house on site will be required to provide hydrological modelling and/or construction Environmental Management plans. This is River Severn: There is potential for changes to the ensured through existing Core Strategy Policies. water environment (reduced water quality through pollution/contamination impacts and

It is recommended that for polices identified with potential incombination impacts that additional wording is added to the policies special requirements.

No. But

Development proposals must demonstrate that the treatment of waste water and any run off can be adequately provided for and that no adverse effects on the integrity of the River Severn SAC, SPA and Ramsar sites result"

The Appropriate Assessment identified existing policy safeguards in the Core Strategy, CSP1. - Design and Environmental Protection and CSP2 – Climate Change and the AP Policy AP7 Biodiversity with regards to potential habitat fragmentation impacts to the Wye Valley and Forest of Dean Bat SAC.

AP20 Bat SAC. Colliery River

0 0 Ρ 0 P 1.1km from 7.6km from

management is incorporated into any CEMP.

changes to water regimes).

incorporated into any CEMP.

In River Severn catchment. Connected via ditches to the Cinderford Brook. There are hydrological

inks to the Severn and any development at the site

intensification/change to tourism and recreation

lighting). There are existing buildings on site

to theoretical possible impacts to bat SAC.

may impact on wider Wye Valley and FoD bat SAC due to fragmentation and disturbance (noise,

which may have potential to support bats leading

must ensure that water management is

Site in current use but potential that

Former Lightmoor

Severn SAC

AP 24 Cannop Depot	11.8km from Severn Estuary	0	0	Ρ	0	Ρ	Check for likely significant effects in combination, former colliery site connected to the Cannop Brook within Severn Estuary catchment.	See Appropriate Assessment sections on Water Management, Air quality and disturbance (recreation) for in combination effects.	No. But changes needed
							Existing recreational site, provision for increases use in AP.	The Appropriate Assessment identified regulatory process (Severn Trent Water, Welsh Water and the Environment	
							River Severn: There is potential for changes to the water environment (reduced water quality through pollution/contamination impacts and changes to water regimes).	Agency) address the majority of the concerns. There are also existing policy safeguards in the Core Strategy, CSP1 Design and Environmental Protection and CSP2 – Climate Change	
							In River Severn catchment. Connected to the Cannop Brook. There are hydrological inks to the Severn and any development at the site must ensure that water management is incorporated into any CEMP.	Project Level requirements: For those policies identified as having a potential in-combination impact individual proposals will be required to provide hydrological modelling and/or construction Environmental Management plans. This is ensured through existing Core Strategy Policies.	
							Site in current use but potential that intensification/change to tourism and recreation may impact on wider Wye Valley and FoD bat SAC	It is recommended that for polices identified with potential in- combination impacts that additional wording is added to the policies special requirements.	
							due to fragmentation and disturbance (noise, lighting). Leading to theoretical possible impacts to bat SAC.	Development proposals must demonstrate that the treatment of waste water and any run off can be adequately provided for and that no adverse effects on the integrity of the River Severn SAC, SPA and Ramsar sites result"	
								The Appropriate Assessment identified existing policy safeguards in the Core Strategy, CSP1 Design and Environmental Protection and CSP2 – Climate Change and the AP Policy AP7 Biodiversity with regards to potential habitat fragmentation impacts to the Wye Valley and Forest of Dean Bat SAC.	
AP 25 Whitemead Park	7km from Severn Estuary	0	0	Ρ	0	Ρ	Check for likely significant effects in combination, former colliery site adjacent to The Lyd within Severn Estuary catchment.	See Appropriate Assessment sections on Water Management, Air quality and disturbance (recreation) for in combination effects.	No. But changes needed
							Existing site, provision for additional development within site.	The Appropriate Assessment identified regulatory process	

River Severn: There is potential for changes to the water environment (reduced water quality through pollution/contamination impacts and changes to water regimes).

In River Severn catchment. Site adjacent to the river Lyd. There are hydrological inks to the Severn and any development at the site must ensure that water management is incorporated into any CEMP.

Site in current use but potential that intensification/change to tourism and recreation may impact on wider Wye Valley and FoD bat SAC due to fragmentation and disturbance (noise, lighting). There are existing buildings on site which may have potential to support bats leading to theoretical possible impacts to bat SAC. (Severn Trent Water, Welsh Water and the Environment Agency) address the majority of the concerns. There are also existing policy safeguards in the Core Strategy, CSP1. - Design and Environmental Protection and CSP2 – Climate Change

Project Level requirements: For those policies identified as having a potential in-combination impact individual proposals will be required to provide hydrological modelling and/or construction Environmental Management plans. This is ensured through existing Core Strategy Policies.

It is recommended that for polices identified with potential incombination impacts that additional wording is added to the policies special requirements.

Development proposals must demonstrate that the treatment of waste water and any run off can be adequately provided for and that no adverse effects on the integrity of the River Severn SAC, SPA and Ramsar sites result"

The Appropriate Assessment identified existing policy safeguards in the Core Strategy, CSP1. - Design and Environmental Protection and CSP2 – Climate Change and the AP Policy AP7 Biodiversity with regards to potential habitat fragmentation impacts to the Wye Valley and Forest of Dean Bat SAC.

No. But

changes needed

AP 26Not aPPPPPPPAdditionalspecific siteCycleallocationbut policysthatpromotesnew cycleconnections.

Check for likely significant effects in combination

General policy statement promoting the establishment of additional cycle paths, especially linkages between settlements.

The provision of cycle ways can have the potential to cause habitat fragmentation and noise, lighting and recreational disturbance within the Forest of Dean. This may impact the wider bat pollutions in the district leading to theoretical possible impacts Whilst Core Strategy Policy 1 provides for protection of designated sites, as the policy promotes the establishment of cycle ways throughout the district it is recommended the wording in this policy is strengthen to include:

"Development will only be permitted where it can be demonstrated that it will not have an adverse effect on the integrity of any designated SAC, SPA or Ramsar sites."

			to the bat SACs.		
			Cycle ways through woodland areas have the potential to impact the Wye Valley Woodlands both in term of recreational disturbance and habitat loss and fragmentation. Construction may cause potential water quality issues if adjacent to water courses close to SACs.		
AP 27	1.2km from	РРР	Distinct policies cover existing proposals AP27 – 29. Therefore this policy generally promotes cycle ways in a wider landscape which may impact any of the SACs in the district. Check for likely significant effects in combination.	Whilst Core Strategy Policy 1 provides for protection of	No. But
Lydney to Parkend Cycle Route	bat SAC		River Severn: There is potential for changes to the water environment (reduced water quality through pollution/contamination impacts and changes to water regimes).	designated sites , this policy promotes the establishment of a cycle ways alongside the River Lyd and just over 1km from the Wye Valley and Forest of Dean Bat SAC . It is therefore recommended the wording in this policy is strengthen to include:	changes needed
			In River Severn catchment. The route runs alongside the river Lyd. There are hydrological inks to the Severn and any development of the route must ensure that water management is incorporated into any CEMP.	"Development will only be permitted where it can be demonstrated that it will not have an adverse effect on the integrity of any designated SAC, SPA or Ramsar site.	
			The route would result in recreational activity which may impact on the wider Wye Valley and FoD bat SACs; due to fragmentation and disturbance from recreation as well as noise and possibly lighting). Leading to theoretical possible		
AP29 Wye Valley	1.3km from PPP river Severn Borders River Wye SAC	РРР	impacts to bat SAC. This is a scheme with lapsed planning permission. The scheme was subject to an Environmental Statement and Habitats Regulations Assessment which found no Likely Significant Effects after mitigation measures.	Whilst Core Strategy Policy 1 provides for protection of designated sites, this policy promotes the establishment of a cycle way alongside the River Wye and through the Wye Valley Woodlands and close to bat sites (bats are known within the disused tunnel. It is therefore recommended the wording in this policy is strengthen to include:	No. But changes needed

	Within Wye Valley Woodlands SAC 300m from WV Bat SAC						The cycleway would run from near the the Severn Estuary SAC, SPA and Ramsar, past (and crosses) the River Wye SAC, through the Wye Valley Woodlands SAC and through tunnels used by lesser horseshoe bats, a qualifying feature of the Wye Valley and Forest of Dean Bat SAC. The previously agreed scheme had a number of specific requirements to ensure the resulting significant issues are appropriately addresses and impacts avoided or satisfactorily mitigated.	Add to ends of policy wording: Change sentence from policy: Development will only be permitted where it can be demonstrated that it will not have an adverse effect on the integrity of any designated SAC, SPA or Ramsar.	
AP 33 Station Street, Cinderford Housing Allocation	Approximat ely 5km from River Severn and 9km from designated section.	0	0	Р	0	0	 Possible In Combination. Water Quality. Check for likely significant effects in combination – Previously developed land most former employment site. Site connected to the Cinderford Brook within Severn Estuary catchment and connected to the Severn Estuary SAC, SPA and Ramsar. The policy allocates about 150 dwellings. The area has been partially redeveloped for housing and this allocation completes the process. River Severn: There is potential for changes to the water environment (reduced water quality through pollution/contamination impacts and changes to water regimes). In River Severn catchment. Connected directly to the Cinderford Brook. There are hydrological inks to the Severn and any development at the site must ensure that water management is incorporated into any CEMP. 	 See Appropriate Assessment sections on Water Management, Air quality and disturbance (recreation) for in combination effects. The Appropriate Assessment identified regulatory process (Severn Trent Water, Welsh Water and the Environment Agency) address the majority of the concerns. There are also existing policy safeguards in the Core Strategy, CSP1 Design and Environmental Protection and CSP2 – Climate Change Project Level requirements: For those policies identified as having a potential in-combination impact individual proposals will be required to provide hydrological modelling and/or construction Environmental Management plans. This is ensured through existing Core Strategy Policies. It is recommended that for polices identified with potential in- combination impacts that additional wording is added to the policies special requirements. Development proposals must demonstrate that the treatment of waste water and any run off can be adequately provided for and that no adverse effects on the integrity of the River Severn SAC, SPA and Ramsar sites result" 	No. But changes needed

AP 39 Lydney Town Centre, Retail and mixed use including Public Space	Over 2km from Severn Estuary SAC/SPA and Ramsar	0 0	Ρ	0	0	Check for likely significant effects in combination, proximity to water course connected to Severn Estuary. 1.9ha is allocated for mixed use, including public open space and access along the riverside. River Severn: There is potential for changes to the water environment (reduced water quality through pollution/contamination impacts and changes to water regimes). In River Severn catchment. Connected directly to the river Lyd. There are hydrological inks to the Severn and any development at the site must ensure that water management is incorporated into any CEMP.	 See Appropriate Assessment sections on Water Management, Air quality and disturbance (recreation) for in combination effects. The Appropriate Assessment identified regulatory process (Severn Trent Water, Welsh Water and the Environment Agency) address the majority of the concerns. There are also existing policy safeguards in the Core Strategy, CSP1 Design and Environmental Protection and CSP2 – Climate Change Project Level requirements: For those policies identified as having a potential in-combination impact individual proposals will be required to provide hydrological modelling and/or construction Environmental Management plans. This is ensured through existing Core Strategy Policies. It is recommended that for polices identified with potential in- combination impacts that additional wording is added to the policies special requirements. Development proposals must demonstrate that the treatment of waste water and any run off can be adequately provided for and that no adverse effects on the integrity of the River Severn SAC, SPA and Ramsar sites result" 	No. But changes needed
AP 40 Hill Street Lydney	Over 2km from Severn Estuary SAC/SPA and Ramsar	0 0	Ρ	o	0	Check for likely significant effects in combination, proximity to water course connected to Severn Estuary 1.1 ha adjacent to River Lyd for mixed use. Allocated for about 25 dwellings. River Severn: There is potential for changes to the water environment (reduced water quality through pollution/contamination impacts and	See Appropriate Assessment sections on Water Management, Air quality and disturbance (recreation) for in combination effects. The Appropriate Assessment identified regulatory process (Severn Trent Water, Welsh Water and the Environment Agency) address the majority of the concerns. There are also existing policy safeguards in the Core Strategy, CSP1 Design and Environmental Protection and CSP2 – Climate Change	No. But changes needed

						changes to water regimes). In River Severn catchment. Directly adjacent to the river Lyd. There are hydrological inks to the Severn and any development at the site must ensure that water management is incorporated into any CEMP.	 Project Level requirements: For those policies identified as having a potential in-combination impact individual proposals will be required to provide hydrological modelling and/or construction Environmental Management plans. This is ensured through existing Core Strategy Policies. It is recommended that for polices identified with potential incombination impacts that additional wording is added to the policies special requirements. Development proposals must demonstrate that the treatment of waste water and any run off can be adequately provided for and that no adverse effects on the integrity of the River Severn SAC, SPA and Ramsar sites result" 	
AP 41 Lydney Town Centre Highway Improveme nts	Over 2km from Severn Estuary SAC/SPA and Ramsar	0 0	Ρ	0	0	Check for likely significant effects in combination, proximity to water course connected to Severn Estuary Highway improvements including new link road. River Severn: There is potential for changes to the water environment (reduced water quality through pollution/contamination impacts and changes to water regimes). In River Severn catchment. Connected directly to the river Lyd. There are hydrological inks to the Severn and any development at the site must ensure that water management is incorporated into any CEMP.	 See Appropriate Assessment sections on Water Management, Air quality and disturbance (recreation) for in combination effects. The Appropriate Assessment identified regulatory process (Severn Trent Water, Welsh Water and the Environment Agency) address the majority of the concerns. There are also existing policy safeguards in the Core Strategy, CSP1 Design and Environmental Protection and CSP2 – Climate Change Project Level requirements: For those policies identified as having a potential in-combination impact individual proposals will be required to provide hydrological modelling and/or construction Environmental Management plans. This is ensured through existing Core Strategy Policies. It is recommended that for polices identified with potential in- combination impacts that additional wording is added to the policies special requirements. Development proposals must demonstrate that the treatment of waste water and any run off can be adequately provided for and that no adverse effects on the integrity of the River Severn 	No. But changes needed

						SAC, SPA and Ramsar sites result"	
AP 44 Lydney Industrial Estate	150m from ⁰ Severn Estuary SAC/SPA and Ramsar		P	0 0	Check for likely significant effects in combination, proximity to water course connected to Severn Estuary. The existing industrial estate of 24ha. Extensively developed but capable of some re-development. River Severn: There is potential for changes to the water environment (reduced water quality through pollution/contamination impacts and changes to water regimes). In River Severn catchment. Connected directly to the river Lyd. There are hydrological inks to the Severn and any development at the site must ensure that water management is incorporated into any CEMP.	 The policy wording makes reference to the close proximity of the Severn Estuary SAC, SPA and Ramsar and highlights that any scheme may be subject to the requirements of the Habitats Regulations and therefore may require HRA. 1.Existing Policy wording of AP 43 should be repeated (under special requirements) All proposals will need to take full account of and be compatible with the estuary, its protected status (SAC) and the Habitats Regulations. 2. Whilst Core Strategy Policy 1 provides for protection of designated sites it is recommended the wording in this policy is strengthened. The following changes are recommended: Change the sentence in the section "Special Requirements" in policy wording: As with any development near the estuary any scheme is subject to the requirements of the habitats regulations. All proposals will need to take full account of the conservation status of the estuary and be compatible with the Habitats Regulations. 	No. But changes needed
AP 45 Lakes South of the Mainline Railway	500m from ⁰ Severn Estuary SAC/SPA and Ramsar	0	P	0 0	Check for likely significant effects in combination, proximity to water course connected to Severn Estuary Approximately 18ha of land south of the mainline	European Sites" are likely to be required. The policy wording makes reference to the close proximity of the Severn Estuary SAC, SPA and Ramsar and highlights that any scheme may be subject to the requirements of the Habitats Regulations and therefore may require HRA.	No but changes needed

railway is allocated for informal recreation and open space compatible with its existing or enhanced nature conservation value.

River Severn: There is potential for changes to the water environment (reduced water quality through pollution/contamination impacts and changes to water regimes).

In River Severn catchment. Connected directly to the river Lyd. There are hydrological inks to the Severn and any development at the site must ensure that water management is incorporated into any CEMP.

 P Check for likely significant effects in combination, proximity to water course connected to Severn Estuary.

> The policy promotes new and improved cycling and walking routes. It states that new routes will be identified and encouraged in the harbour area.

> River Severn: There is potential for changes to the water environment (reduced water quality through pollution/contamination impacts and changes to water regimes).

In River Severn catchment. Connected directly to the river Lyd. There are hydrological inks to the Severn and any development at the site must ensure that water management is incorporated into any CEMP.

The routes would result in recreational activity which may impact on the wider Wye Valley and FoD bat SACs and Severn Estuary SAC, SPA and Ramsar; due to fragmentation and disturbance from recreation as well as noise and possibly Change the sentence in the section "Special Requirements" in policy wording:

As with any development near the estuary any scheme is subject to the requirements of the Habitats Regulations.

All proposals will need to take full account of the conservation status of the estuary and be compatible with the Habitats Regulations. Special requirements as set out in "Lydney European Sites" are likely to be required.

No. But changes

needed

Whilst Core Strategy Policy 1 provides for protection of designated sites it is recommended the wording in this policy is strengthen to include:

Add to Policy wording:

All proposals will need to take full account of the conservation status of the estuary and be compatible with the Habitats Regulations. Special requirements as set out in "Lydney European Sites" may be required

AP 46BordersLydneySevernHarbourEstuaryArea -SAC/SPACycling andand RamsarwalkingSacconstruction

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estuary. 0 0 Ρ 0 Check for likely significant effects in combination, proximity to water course connected to Severn The Appropriate Assessment identified regulatory process (Severn Trent Water, Welsh Water and the Environment Estuary. Agency) address the majority of the concerns. There are also East of Lydney land (including the remainder of existing policy safeguards in the Core Strategy, CSP1. - Design the planned new neighbourhood. and Environmental Protection and CSP2 – Climate Change Approximately 1684 new dwellings, 25.8ha of Project Level requirements: For those policies identified as employment generating uses (including associated having a potential in-combination impact individual proposals landscaping), a neighbourhood centre, a public will be required to provide hydrological modelling and/or park and associated recreation space and land for construction Environmental Management plans. This is an additional primary school. ensured through existing Core Strategy Policies. There are potential in-combination effects in relation to The intention of this policy is to retain the commitment to the partially completed major disturbance and habitat fragmentation. It is recommended development east of Lydney. the following wording is added to the Policy: The policy is expected to be implemented in All proposals will need to take full account of the conservation phases and by different developers but should status of the estuary and be compatible with the Habitats *Regulations.* Special requirements as set out in "Lydney" result in a single coherent mixed use European Sites" may be required. neighbourhood. The allocation will deliver a major mixed development which may not be complete by the end of the plan period. The allocation re affirms the large employment commitment immediately to the east of the bypass, Hurst Farm. Some 15ha of land will be provided here for a variety of uses within a gross area approaching 22ha. Potential Significant Impacts in combination River Severn: There is therefore potential for disturbance (noise, light and vibration) and changes to the water environment (reduced water

AP 47 East of Lydney

closest point Severn Estuary SAC/SPA and Ramsar

300m at

lighting). Leading to theoretical possible impacts to bat SAC and the qualifying species of the

No. But changes needed

					quality through pollution/contamination impacts and changes to water regimes). There are identified in combination impacts to Estuary species particularly in relation to employment allocation on east side of Lydney ring road.		
					Wye Valley and Forest of Dean Bat Sites: There is also theoretical potential for fragmentation and lighting impacts to bat flight ways. Potential In-combination effects on European Sites are discussed in Section 6.		
AP 48 Employme nt Uses Including Foundry Site	Approx. 1km Severn Estuary SAC/SPA and Ramsar	0 0	РО	0	Check for likely significant effects in combination, proximity to water course connected to Severn Estuary. About 5.7ha is allocated for employment, some of the land is in current use.	The Appropriate Assessment identified regulatory process (Severn Trent Water, Welsh Water and the Environment Agency) address the majority of the concerns. There are also existing policy safeguards in the Core Strategy, CSP1 Design and Environmental Protection and CSP2 – Climate Change	No. But changes needed
					River Severn: There is potential for changes to the water environment (reduced water quality through pollution/contamination impacts and changes to water regimes). In River Severn catchment. Connected directly to	Project Level requirements: For those policies identified as having a potential in-combination impact individual proposals will be required to provide hydrological modelling and/or construction Environmental Management plans. This is ensured through existing Core Strategy Policies.	

the river Lyd. There are hydrological inks to the

Severn and any development at the site must

into any CEMP.

ensure that water management is incorporated

It is recommended that for polices identified with potential incombination impacts that additional wording is added to the policies special requirements.

Development proposals must demonstrate that the treatment of waste water and any run off can be adequately provided for and that no adverse effects on the integrity of the River Severn SAC, SPA and Ramsar sites result"

AP 49 Mead Lane Lydney	Approx. 1km Severn Estuary SAC/SPA and Ramsar	0	0	Ρ	0	0	Check for likely significant effects in combination, proximity to water course connected to Severn Estuary 6.5ha allocated for employment use, expanding the adjacent existing mead lane site. River Severn: There is potential for changes to the water environment (reduced water quality through pollution/contamination impacts and changes to water regimes). In River Severn catchment. Connected directly to the river Lyd. There are hydrological inks to the Severn and any development at the site must ensure that water management is incorporated into any CEMP.	The Appropriate Assessment identified regulatory process (Severn Trent Water, Welsh Water and the Environment Agency) address the majority of the concerns. There are also existing policy safeguards in the Core Strategy, CSP1 Design and Environmental Protection and CSP2 – Climate Change Project Level requirements: For those policies identified as having a potential in-combination impact individual proposals will be required to provide hydrological modelling and/or construction Environmental Management plans. This is ensured through existing Core Strategy Policies. It is recommended that for polices identified with potential in- combination impacts that additional wording is added to the policies special requirements. Development proposals must demonstrate that the treatment of waste water and any run off can be adequately provided for and that no adverse effects on the integrity of the River Severn	No. But changes needed
AP 50 Mead Lane (existing employme nt area)	Approx. 1.4km Severn Estuary SAC/SPA and Ramsar	0	0	Ρ	0	0	Check for likely significant effects in combination, proximity to water course connected to Severn Estuary Existing employment area of about 22ha, identified for continued use. River Severn: There is potential for changes to the water environment (reduced water quality through pollution/contamination impacts and changes to water regimes). In River Severn catchment. Connected directly to the river Lyd. There are hydrological inks to the	 SAC, SPA and Ramsar sites result" The Appropriate Assessment identified regulatory process (Severn Trent Water, Welsh Water and the Environment Agency) address the majority of the concerns. There are also existing policy safeguards in the Core Strategy, CSP1 Design and Environmental Protection and CSP2 – Climate Change Project Level requirements: For those policies identified as having a potential in-combination impact individual proposals will be required to provide hydrological modelling and/or construction Environmental Management plans. This is ensured through existing Core Strategy Policies. It is recommended that for polices identified with potential in-combination impacts that additional wording is added to the 	No. But changes needed

						Severn and any development at the site must ensure that water management is incorporated into any CEMP.	policies special requirements.	
							Development proposals must demonstrate that the treatment of waste water and any run off can be adequately provided for and that no adverse effects on the integrity of the River Severn SAC, SPA and Ramsar sites result"	
AP 51 Railway Station Area	Approx. 0 C 1km Severn Estuary SAC/SPA and Ramsar	· · · · · · · · · · · · · · · · · · ·	p in	0	0	Check for likely significant effects in combination, proximity to water course connected to Severn Estuary An area of about 2.2ha north of the mainline railway is allocated for the development of the station, its associated facilities and for related mixed uses. Includes housing element. River Severn: There is potential for changes to the water environment (reduced water quality through pollution/contamination impacts and changes to water regimes). In River Severn catchment. Connected directly to the river Lyd. There are hydrological inks to the Severn and any development at the site must	The Appropriate Assessment identified regulatory process (Severn Trent Water, Welsh Water and the Environment Agency) address the majority of the concerns. There are also existing policy safeguards in the Core Strategy, CSP1 Design and Environmental Protection and CSP2 – Climate Change Project Level requirements: For those policies identified as having a potential in-combination impact individual proposals will be required to provide hydrological modelling and/or construction Environmental Management plans. This is ensured through existing Core Strategy Policies. It is recommended that for polices identified with potential in- combination impacts that additional wording is added to the policies special requirements.	No. But changes needed
						ensure that water management is incorporated into any CEMP.	of waste water and any run off can be adequately provided for and that no adverse effects on the integrity of the River Severn SAC, SPA and Ramsar sites result"	
AP 52 Land North of the mainline railway	Approx. 0 C 1km Severn Estuary SAC/SPA and Ramsar		P	0	0	Check for likely significant effects in combination, proximity to water course connected to Severn Estuary. About 18.2ha of land formerly used as a tip but since restored is allocated for recreational use. The site is split into three by the link road to the station and the bypass. It has potential to provide a number of routes for cycling and walking in	Potential In-combination effects on European Sites are The Appropriate Assessment identified regulatory process (Severn Trent Water, Welsh Water and the Environment Agency) address the majority of the concerns. There are also existing policy safeguards in the Core Strategy, CSP1 Design and Environmental Protection and CSP2 – Climate Change Project Level requirements: For those policies identified as	No

addition to the approved cycle link between the town and the station.

River Severn: There is potential for changes to the water environment (reduced water quality through pollution/contamination impacts and changes to water regimes).

having a potential in-combination impact individual proposals will be required to provide hydrological modelling and/or construction Environmental Management plans. This is ensured through existing Core Strategy Policies.

In River Severn catchment. Connected directly to the river Lyd. There are hydrological inks to the Severn and any development at the site must ensure that water management is incorporated into any CEMP.

AP 53 Holms Farm-Housing Site

Approx.

1.8km from

Wye Valley

and FoD

bat SAC

0 0

0 0

Screened Out - policy incorporates mitigation measures for SAC features.

About 1.8ha allocated for housing (about 27). It is known that the existing buildings are extensively used by bats and any scheme will need to provide for this. The presence of bats will have a major impact on design and layout and the number of dwellings that be built.

The existing policy wording highlights the need to (under special requirements):

No. But changes needed

Accommodate bats using the site including provision for roosting/ and foraging routes, development is subject to the requirements of the habitats regulations

The bats using the site are likely to be linked to the nearby Wye Valley and Forest of Dean bat SAC and are likely to be regarded as a qualifying feature of the SAC.

Bat flight ways and dark flight paths are essential in maintaining the existing roost and are therefore an essential element of the design and layout of the scheme.

It is therefore recommended the wording of the policy includes important caveats:

"Development will only be permitted where it can be demonstrated that it will not have an adverse effect on the integrity of the Wye Valley and Forest of Dean Bat SAC."

AP 77 High	Approx.	0	0	Р	о	0	Possible in combination. Water quality.		No. But
Street, Drybrook	7km from river Severn and						1.8ha is allocated for residential development of about 50 dwellings.	The Appropriate Assessment identified regulatory process (Severn Trent Water, Welsh Water and the Environment Agency) address the majority of the concerns. There are also	changes needed
	1km to designated section.						STW have expressed concern over the in combination effect of the development taking into	existing policy safeguards in the Core Strategy, CSP1 Design and Environmental Protection and CSP2 – Climate Change	
							account the larger scale developments	Project Level requirements: For those policies identified as	
							downstream in Cinderford on the capacity of the Cinderford STW.	having a potential in-combination impact individual proposals will be required to provide hydrological modelling and/or construction Environmental Management plans. This is	
							River Severn: There is potential for changes to the water environment (reduced water quality	ensured through existing Core Strategy Policies.	
							through pollution/contamination impacts and changes to water regimes).	It is recommended that for polices identified with potential in- combination impacts that additional wording is added to the policies special requirements.	
							In River Severn catchment. Connected directly to the Cinderford Brook. There are hydrological inks to the Severn and any development at the site must ensure that water management is	Development proposals must demonstrate that the treatment of waste water and any run off can be adequately provided for and that no adverse effects on the integrity of the River Severn	
							incorporated into any CEMP.	SAC, SPA and Ramsar sites result"	
AP 90 Land	50m from	0	0	Р	о	0	Check for likely significant effects in combination,		No. But
North of Newnham on Severn	River Severn BUT river not						proximity to Severn estuary and forest of dean bat sites	It is recommended a policy caveat is included in the policy wording to ensure any impacts to the SAC are understood measures put in place to avoid impacts.	changes needed
and	designated						About 2.2ha of land to provide about 40 dwellings		
adjoining Unlawater	at this point.						has been allocated. New access off A48.	It is therefore recommended the wording of the policy includes important caveats. The following policy wording is	
Lane	4.7km						Potential In combination Impacts:	recommended to be added to the section "Landscaping" and	
	upstream from						River Severn: There is potential for changes to the water environment (reduced water quality	"Special Requirements":	
	designation						through pollution/contamination impacts and	Landscaping: "To provide substantial planting to the northern	
	. 2.1km from Bat						changes to water regimes).	edge of the site ."	
	SAC Dean						In River Severn catchment. Connected directly to	Special Requirements:	
	Hall						the Cinderford Brook. There are hydrological inks	"Development must demonstrate that it will not have an	

to the Severn and any development at the site must ensure that water management is incorporated into any CEMP. There is a small theoretical potential for in-combination impact regard to disturbance to qualifying species using the River Severn SPA, Ramsar.

Wye Valley and Forest of Dean Bat SAC. Radio tracking has identified this as a area where greater horseshoe bat was recorded using Unlawater land and the area around the school for foraging. It is not known if this is a important area for greater horseshoe but nevertheless development here could impact flight paths and foraging. Site specific requirements are therefore likely to include retention of linear features, their strengthening and retention of dark corridors.

 O O Check for likely significant effects in combination proximity to Severn Estuary

Approximately 2.6ha of land is allocated for about 35 dwellings.

Potential In combination Impacts: River Wye: There is potential for changes to the water environment (reduced water quality through pollution/contamination impacts and changes to water regimes).

In River Wye catchment. Connected directly to the River Wye. Therefore also hydrological inks to the Severn Estuary. Any development at the site must ensure that water management is incorporated into any CEMP.

Sedbury and Tutshill area identified by Welsh Water as having potential issues with regards to water supply, this is resolved by existing policy adverse effect on the integrity of the Wye Valley and Forest of Dean Bat SAC and Severn Estuary SAC, SPA and Ramsar. All proposals must be compatible with the Habitats Regulations."

The Appropriate Assessment identified regulatory process (Severn Trent Water, Welsh Water and the Environment Agency) address the majority of the concerns. There are also existing policy safeguards in the Core Strategy, CSP1. - Design and Environmental Protection and CSP2 – Climate Change

Project Level requirements: For those policies identified as having a potential in-combination impact individual proposals will be required to provide hydrological modelling and/or construction Environmental Management plans. This is ensured through existing Core Strategy Policies.

The Appropriate Assessment identified existing policy safeguards in the Core Strategy, CSP1. - Design and Environmental Protection and CSP2 – Climate Change and the AP Policy AP7 Biodiversity with regards to potential habitat fragmentation impacts to the Wye Valley and Forest of Dean Bat SAC. No. But changes needed

AP 91 Land adjoining A48 and Bigstone

Meadow, Tutshill

1.6km from Severn Estuary SAC. SAC. 1.8km from

500m from

River Wye,

1km from

Wye Valley

Woodlands

P P

D

Bat SAC

wording.

Recreation impacts Wye Valley Woodlands The site is under 1km from the nearest of the Wye Valley Woodland SAC sites. Potential impacts to the Wye Valley Woodlands relate to disturbance impacts from increase recreation.

There are potential fragmentation, foraging issues relating to the Wye Valley and Forest of Dean Bat SACs. A very close nearby site recorded lesser horseshoe bats, and this site is within 2km of a designated bat SAC. There is theoretical possibility that bats forage on this site and are connected to the bat SAC.

O About 3.6ha allocated for up to 110 dwellings.
 Planning permission already granted (2014).

Potential In combination Impacts: River Wye: There is potential for changes to the water environment (reduced water quality through pollution/contamination impacts and changes to water regimes).

In River Wye catchment. Connected directly to the River Wye. Therefore also hydrological inks to the Severn Estuary. Any development at the site must ensure that water management is incorporated into any CEMP.

Sedbury and Tutshill area identified by Welsh Water as having potential issues with regards to water supply and waste water capacity. However this site has existing planning permission and Welsh Water confirmed there were no issues with supply or sewage and drainage that were not covered by planning conditions.

The Appropriate Assessment identified regulatory process (Severn Trent Water, Welsh Water and the Environment Agency) address the majority of the concerns. There are also existing policy safeguards in the Core Strategy, CSP1. - Design and Environmental Protection and CSP2 – Climate Change

Project Level requirements: For those policies identified as having a potential in-combination impact individual proposals will be required to provide hydrological modelling and/or construction Environmental Management plans. This is ensured through existing Core Strategy Policies.

The Appropriate Assessment also identified existing policy safeguards in the Core Strategy, CSP1. - Design and Environmental Protection and CSP2 – Climate Change and the AP Policy AP7 Biodiversity with regards to potential habitat fragmentation impacts to the Wye Valley and Forest of Dean Bat SAC. No. But changes needed

AP 92 Land adjacent Wyedean School, Sedbury

1.5km from Severn Estuary SAC. SAC. 2.2km from Bat SAC and 1km from WV Woodlands

230m from

River Wye.

AP 97 Lydney Road, Whitecroft	1.6km from ⁰ Bat SAC. 4.8km from River Severn Estuary	O P	0 0	Recreation impacts Wye Valley Woodlands The site is just upstream from the nearest of the Wye Valley Woodland SAC sites (less than 1.5km). Potential impacts to the Wye Valley Woodlands relate to water quality and disturbance. Wye Valley and Forest of Dean Bat Sites: There is also theoretical potential for fragmentation and lighting impacts to bat flight ways. Check for likely significant effects in combination, proximity to water course connected to Severn Estuary About 1.4ha of land is allocated for employment uses.	The Appropriate Assessment identified regulatory process (Severn Trent Water, Welsh Water and the Environment Agency) address the majority of the concerns. There are also existing policy safeguards in the Core Strategy, CSP1 Design and Environmental Protection and CSP2 – Climate Change	No
				River Severn: There is potential for changes to the water environment (reduced water quality through pollution/contamination impacts and changes to water regimes). In River Severn catchment. Connected directly to the river Lyd. There are hydrological inks to the Severn and any development at the site must ensure that water management is incorporated into any CEMP.	Project Level requirements: For those policies identified as having a potential in-combination impact individual proposals will be required to provide hydrological modelling and/or construction Environmental Management plans. This is ensured through existing Core Strategy Policies.	
AP 98 Whitecroft Scovill	1.6km from ^O Bat SAC. 4.8km from River Severn Estuary	О Р	0 0	Check for likely significant effects in combination, proximity to water course connected to Severn Estuary 3.5ha approx of land is allocated for mixed development to include employment generating uses and an element of residential use	The Appropriate Assessment identified regulatory process (Severn Trent Water, Welsh Water and the Environment Agency) address the majority of the concerns. There are also existing policy safeguards in the Core Strategy, CSP1 Design and Environmental Protection and CSP2 – Climate Change Project Level requirements: For those policies identified as having a potential in-combination impact individual proposals will be required to provide hydrological modelling and/or	No
				River Severn: There is potential for changes to the water environment (reduced water quality through pollution/contamination impacts and	construction Environmental Management plans. This is ensured through existing Core Strategy Policies.	

changes to water regimes).

In River Severn catchment. Connected directly to the river Lyd. There are hydrological inks to the Severn and any development at the site must ensure that water management is incorporated into any CEMP.