

GRAFTON NEIGHBOURHOOD PLAN HABITATS REGULATIONS ASSESSMENT (HRA)

1. Introduction

- 1.1. This Habitats Regulations Assessment (HRA) relates to the Grafton Parish Neighbourhood Plan 2025 – 2040 Version 7: December 2024, hereafter referred to as the NP, which comprises the Pre-Regulation 14 consultation draft and which was submitted to Wiltshire Council in December 2024.
- 1.2. The HRA has been carried out to comply with Regulation 105 of the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019¹, hereafter referred to as the Habitats Regulations. Under these Regulations, a competent authority must consider whether a relevant plan is likely to have a significant effect on any European sites (formerly also referred to as Natura 2000 sites and now known as the national site network²) before deciding to give any consent, permission or other authorisation. If the screening exercise demonstrates significant effects are likely, whether or not these are addressed through mitigation measures³, the competent authority must undertake an appropriate assessment to examine the effects of the plan on the conservation objectives of the European sites in question, consult the appropriate nature conservation body and have regard to its representations. Both the screening, and any subsequent AA must consider the impacts of the plan alone and in combination with other plans or projects.
- 1.3. It is usually the case that a plan of this nature does not go into the detailed aspects of development proposals and therefore the full effects of potential development cannot be accurately assessed at the plan making stage. Those details will typically be identified through a planning application which would be subject to further, more detailed HRA. The principle that a HRA need only consider the effects of a proposal or policy in as much detail as is specified by the plan was explained by Advocate General Kokott in a judgement brought against the UK government in 2005:

“Many details are regularly not settled until the time of the final permission. It would also hardly be proper to require a greater level of detail in preceding plans or the abolition of multi-stage planning and approval procedures so that the assessment of implications can be concentrated on one point in the procedure. Rather, adverse effects on areas of conservation must be assessed at every relevant stage of the procedure to the extent possible on the basis of the precision of the plan. This assessment is to be updated with increasing specificity in subsequent stages of the procedure.”⁴

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

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

² Due to the Conservation of Habitats and Species Regulations 2017 (as amended) being amended by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 on 1st January 2021.

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

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

- 1.5. Wiltshire Council has conducted the following HRA as competent authority for the Grafton Parish NP. Where risks to European sites are identified, changes are recommended to remove or reduce the risks, and these should be incorporated into the plan before it is made. Likewise, if the policies or planning context change after the HRA is completed, the HRA process must be repeated before the final plan is considered by a referendum and adopted.

2. Screening Methodology

- 2.1. Each element of the plan has been categorised against screening criteria developed by Natural England (NE) to provide a clear audit trail for the screening assessment.
- 2.2. The screening criteria used are as follows:
- Category A1: The policy will not itself lead to development e.g., because it relates to design or other qualitative criteria for development.
 - Category A2: The policy is intended to protect the natural environment.
 - Category A3: The policy is intended to conserve or enhance the natural, built or historic environment.
 - Category A4: The policy would positively steer development away from European sites and associated sensitive areas.
 - Category A5: The policy would have no effect because no development could occur through the policy itself, the development being implemented through other policies in the same plan, which are more specific and therefore more appropriate to assess for their effects on European Sites and associated sensitive areas.
 - Category B: No significant effect.
 - Category C: Likely significant effect alone.
 - Category D: Likely significant effects in combination.
- 2.3. The effect of each policy has been considered both individually and in combination with other plans and projects (see Table 1 in Section 4 below). Where potential for likely significant effects have been identified, an appropriate assessment is presented in subsequent sections.

3. Higher Level HRAs

Wiltshire Core Strategy

- 3.1 The Wiltshire Core Strategy (WCS) HRA (October 2009, February 2012⁵, March 2013⁶, February 2014⁷ and April 2014⁸) identified general parameters to determine the likelihood of potential impacts on European sites/Natura 2000 sites (now known as the national site network⁹). The following potential impact pathways and associated parameters were identified and assessed for the European sites stipulated below.

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

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

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

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

⁸ Wiltshire Core Strategy Updated Habitats Regulations Assessment, April 2014

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

where HRA indicates this is necessary) of the plan area or where Salisbury Plain SPA/SAC is within 15km (it should be noted that the relevant parameter for the latter has since been revised on the basis of data obtained by means of visitor surveys and is now 6.4km):

- Salisbury Plain SPA / SAC
 - River Avon SAC
 - New Forest SAC / SPA
 - Bath and Bradford on Avon Bats SAC (added post adoption of Wiltshire Core Strategy)
- *Hydrology / Hydrogeology – European sites that fall wholly or partly within the Wessex Water Resource Zone may be susceptible to impact:*
 - Salisbury Plain SAC / SPA
 - Bath and Bradford on Avon Bats SAC
 - Pewsey Downs SAC
 - North Meadow and Clattinger Farm SAC
 - River Avon SAC
 - River Lambourn SAC
 - Kennet & Lambourn Floodplain SAC
- *Air Pollution / Nitrogen Deposition – European sites within 200m of a main road*
 - Porton Down SPA
 - Salisbury Plain SAC / SPA
 - Southampton Water SPA
 - North Meadow and Clattinger Farm SAC
 - River Avon SAC
 - Rodborough Common SAC
 - Cotswolds Beechwoods SAC
- *Physical Damage / Interruption of Flight Lines / Disturbance*
 - Bath and Bradford on Avon Bats SAC
 - Porton Down SPA
 - Chilmark Quarries SAC (added post adoption of Wiltshire Core Strategy)
 - Mottisfont Bats SAC (added post adoption of Wiltshire Core Strategy)

Wiltshire Housing Site Allocations Plan

- 3.2 Since the WCS was adopted, the Council published a pre-submission draft of the Wiltshire Housing Site Allocations Plan (WHSAP) together with a HRA dated 21 June 2017. A schedule of proposed changes was considered by Cabinet supported by an Addendum to the HRA dated May 2018. A further schedule of changes and an Addendum to the HRA incorporating minor factual changes were published in September 2018 for public consultation. Subsequently, the WHSAP (Council Version, February 2020) was adopted by Full Council on 25th February 2020, and this was accompanied by the final WHSAP Assessment under the Habitats Regulations (Wiltshire Council, February 2020).

- 3.3 The screening criteria for the adopted WHSAP and final HRA were modified for some European sites from those used for the WCS subsequent to the acquisition of results from new surveys, and in light of advice from Natural England. This includes the zone of influence (Zoi) around the Salisbury Plain SPA used to screen for likely significant effects as a result of recreational pressure being revised from 15km to 6.4km on the basis of data obtained by means of visitor surveys.
- 3.4 Furthermore, since the Core Strategy was adopted, NE has advised Wiltshire Council of its concerns regarding the growing number of visitors to the North Meadow and Clattinger Farm SAC in recent years which has led to an increase in trampling. NE has advised that this is particularly evident at North Meadow (which is also a National Nature Reserve (NNR)) during April and May when visitors come to see the Snake's-head fritillaries in flower. NE considers that the increase in recreational pressure upon the SAC is primarily as a result of increases in the local population, and that major new housing developments within a short travel distance of North Meadow are likely to add to the existing visitor pressure and trampling effects.
- 3.5 The North Meadow and Clattinger Farm SAC Interim Recreation Mitigation Strategy 2023 – 2028 (May 2023, strategy approved for use by Wiltshire Council in November 2023) sets out the mitigation strategy for the North Meadow component of the SAC with regards to new residential and tourism accommodation developments within the identified Zoi. The Clattinger Farm component of the SAC is not subject to the strategy. The Interim Recreation Mitigation Strategy sets out two Zoi, an Inner Zone of 0km - 4.2km and an Outer Zone of 4.2km – 9.4km. The Inner Zone represents the area within which 75% of local year round users (e.g. dog walkers) originate. The Outer Zone represents the area within which 75% of those people who visit to view the Snake's-head fritillaries during the main flowering season originate¹⁰. Mitigation will be achieved through financial contributions to Strategic Access Management Monitoring (SAMM), Infrastructure Mitigation Projects (IMP) and/or Suitable Alternative Natural Greenspace (SANGs). Developments of over 50 units within the Inner Zone will be expected to provide their own SANG unless a financial contribution to the IMP/SANG project system can be robustly justified. The strategy is an interim approach and will be reviewed within 5 years following further monitoring and surveys.
- 3.6 Potential recreational impacts on the New Forest SPA/SAC were initially identified by the HRA to the South Wiltshire Core Strategy which was adopted in 2012. The HRA identified an 8km Zoi around the SPA/SAC. Core Policy 50 of the WCS addressed the New Forests mitigation requirements, identifying the need for a New Forest Mitigation Strategy. Since the WCS was adopted, the council has joined a partnership of local authorities seeking to develop a strategic approach to mitigation including the extent of the zone of influence and how to fairly reflect different visit rates within it. This evidence informed the preparation of an Interim Recreation Mitigation Strategy by Wiltshire Council.
- 3.7 The WCS adopted the 8km zone of influence, however, as discussed in the latest iteration of the council's strategy, from 1st September 2021, this was revised to 13.8km, and may be extended to include applications within 15km, where demonstrated to be necessary through a bespoke appropriate assessment.
- 3.8 At a Cabinet meeting on the 7th May 2024, a revised mitigation approach with regards to recreational impacts on the New Forest SPA/SAC was agreed for all new residential and tourism developments within the Zois around the SPA/SAC. This revised approach maintains the 13.8km and 15km Zois and came into effect immediately. The revised Recreation Mitigation Strategy document will be published on the Council's website shortly.

¹⁰ North Meadow and Clattinger Farm SAC Interim Recreation Mitigation Strategy 2023 – 2028. Cotswold District Council, Swindon Borough Council and Wiltshire Council in partnership with Natural England. May 2023

- 3.9 The revised approach requires developers to provide a contribution of £600 per dwelling/unit towards Strategic Access Management and Monitoring (SAMM) for all new residential and tourism developments within the Zols, including those coming forward under permitted development. Residential developments of 50 or more dwellings on greenfield or brownfield sites would also be required to provide an area of Suitable Alternative Natural Greenspace (SANG).
- 3.10 The details of the revised approach are set out in the Cabinet paper dated 7th May and can be found here: [Cabinet paper 7th May - Revised New Forest Mitigation Strategy](#).
- 3.11 Since the WCS was adopted and on the advice of NE, any plan or project that will lead to development within the catchment of the River Avon SAC must be phosphorous neutral and be subject to appropriate assessment which concludes no adverse effect on the SAC alone or in-combination with other plans or projects in order to be authorised.

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

- 3.12 Similarly, it came to light in spring 2020 that any plan or project that will lead to development within the catchment of the River Test must be nitrogen neutral as the Test drains into the Solent and this region is protected by a number of European and international designations including the Solent Maritime SAC, Chichester and Langstone Harbours SPA, Portsmouth Harbour SPA and Solent and Southampton Water SPA and Ramsar site. In 2018 and 2019 Natural England undertook a number of condition assessments of the features of these designated sites around the Solent. These assessments identified that high levels of nitrogen and phosphorus are entering this water environment and that there is sound evidence that nitrogen in particular is causing eutrophication at the aforementioned designated sites and that the resulting excessive growth of green algae and plants, which reduces oxygen and light levels, is leading to negative effects on the special features for which the European sites are designated. These nutrient inputs currently mostly come either from agricultural sources or from wastewater from existing housing and other development. These findings were published by Natural England in June 2020 in *Advice on Achieving Nutrient Neutrality for New Development in the Solent Region*. This advice also stipulates that:

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

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

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

- 3.13 In accordance with Natural England’s advice, any plan or project which will lead to development within the catchment of the River Test cannot be approved unless nitrogen neutrality has been demonstrated via quantitative means, and an AA conducted by the competent authority has concluded beyond reasonable scientific doubt that there would be no adverse effects on the integrity of any of the Solent region European sites.

- 3.14 In 2022 the River Lambourn SAC and the Somerset Levels and Moors Ramsar site were identified by NE as being in unfavourable condition due to excessive phosphorus inputs. A very small area of both of these sites are located within Wiltshire. Any overnight accommodation development within the catchment of the SAC or Ramsar site are now required to demonstrate phosphorous neutrality and be subject to an appropriate assessment which concludes no adverse effect on the SAC or Ramsar site alone or in combination with other plans or projects in order to be authorised.

Screening of the Grafton Parish NP Area

Recreation

- 3.15 The SAC habitat features were screened out of appropriate assessment for the Wiltshire Core Strategy in respect of recreational pressure on the advice of Natural England. Recreational/visitor pressure is a known issue for the Salisbury Plain SPA. Two small areas in the west and south west of the NP area lie within the 6.4km zone around the SPA within which the majority (75%) of visitors to the Plain are expected to live. This data was collated by means of a visitor survey commissioned by the Council in 2015. The NP does not allocate any sites for development within the small areas of the NP area which fall within the 6.4km zone around the SPA and the other policies in the NP do not support development within the wider NP area. As such, appropriate assessment has been screened out with respect of the Salisbury Plain SPA. If a subsequent version of the NP were to promote development within these areas the NP may need to be screened in to appropriate assessment with respect to Salisbury Plain SPA.
- 3.16 Recreational pressure on the River Avon SAC is recognised to occur in limited circumstances predominately where significant development lies immediately adjacent or in close proximity to the river, which will not occur as a result of this NP as the closest component of the River Avon SAC lies approximately 6.8km to the west of the NP area at its closest point and has therefore been screened out of appropriate assessment.
- 3.17 The NP area lies a substantial distance beyond the 13.8km ZoI around the New Forest SPA/SAC within which the majority of day visitors to the New Forest originate¹¹. Appropriate assessment with respect to the New Forest SPA/SAC has therefore been screened out.
- 3.18 The NP area lies approximately 40.4km from the nearest component of the Bath and Bradford on Avon Bats SAC and there are no core roosts functionally linked to the SAC or core areas associated with core roosts within the NP area.
- 3.19 The NP area lies a substantial distance beyond the outer 4.2km – 9.4km recreational ZoI around the North Meadow and Clattinger Farm SAC, at its closest point, and as such appropriate assessment with respect of this European site can be screened out.

Hydrology / Hydrogeology

- 3.20 The majority of the NP area is located within the catchment of the River Kennet and tributaries, within the River Thames Basin District. This is within the Thames Water Swindon and Oxfordshire Water Resource Zones (WRZ). The closest component of the Kennet and Lambourn Floodplain SAC is located approximately 8.3km to the north east of the NP area. The Kennet and Lambourn Floodplain SAC supports one of the most extensive known populations of Desmoulin's whorl snail *Vertigo moulinsiana* in the UK.
- 3.21 It is known that there is limited water available for abstraction from the Upper Kennet and Og rivers, both of which drain into the Kennet and Lambourn Floodplain SAC. Some of the components of the SAC have been assessed as being in unfavourable condition as they fail to meet target moisture levels which has been attributed to water abstraction. The Environment Agency (EA) has therefore declared a water resource status of 'Water not available for licencing' for much of these catchments in Wiltshire.

¹¹ Wiltshire Core Strategy Updated Habitats Regulations Assessment, April 2014

- 3.22 The area of the NP area that falls within the River Kennet and tributaries catchment, falls within the Upper Dun sub catchment and not the Upper Kennet and Og sub catchments. With regards to the potential for likely significant effects on the Kennet and Lambourn Floodplain SAC from water abstraction, the Upper Dun catchment has not been identified in the HRA (2012,2013,2014) for the Core Strategy or the HRA (2020) for the WHSAP as being at risk of low flows from abstraction. Therefore, abstraction for public water supply (PWS) due to the allocations within the NP is not considered likely to cause likely significant effects on the Kennet and Lambourn Floodplain SAC.
- 3.23 Less than half of the NP area is located within the catchment of the Hampshire Avon and a very small area of the NP area is located within the River Test catchment. Residential development within the Hampshire Avon catchment is expected to demonstrate phosphorus neutrality in perpetuity and within the River Test catchment is expected to demonstrate nitrogen neutrality in perpetuity. None of the allocated sites are located within or within close proximity to these two catchment areas and the other policies in the NP do not support development in the wider NP area therefore appropriate assessment with regards to the River Avon SAC and the Solent designated sites¹² has been screened out. If a subsequent version of the NP were to promote development within these areas the NP may need to be screened in to appropriate assessment.

Air Pollution / Nitrogen Deposition

- 3.24 The Wiltshire Core Strategy HRA identified that increased traffic would lead to potential effects through an increase in atmospheric pollution and nitrogen deposition upon a range of European sites within 200m of a main road. Such effects were considered to be very small and difficult to predict at the strategic level¹³. The NP allocates three sites (across 2 policies) for approximately 26 dwellings and all three sites are adjacent to the A338, however the closest European sites to the NP are Salisbury Plain SPA/SAC and the River Avon SAC which are located over 5km to the south west and west respectively. As such it is concluded that the NP will not result in significant effects on European sites as a result of nitrogen or particulate matter deposition.

Physical Damage / Interruption of Flight Lines / Disturbance

- 3.24. Two small areas in the south of the NP area are located within the 6.4km ZoI for recreational pressure on the Salisbury Plain SPA. Residential development within this zone could lead to an increase in visitor pressure on the SPA and physical disturbance and fragmentation of breeding or foraging habitat of breeding stone-curlew however the NP does not allocate any sites or support development within these areas and therefore recreational pressure on stone-curlew has been screened out. There are several stone-curlew records within the southern area of the NP area. Stone-curlew are susceptible to disturbance from visual stimuli within 1km. The closest record lies approximately 1.1km from the southern site allocated in Policy 1A and approximately 1.2km from the site allocated in Policy 1B and there are farm buildings and pockets of woodland between the sites and the record. As such appropriate assessment with respect to stone-curlew can be screened out. If a subsequent version of the NP were to promote development within the southern area of the NP area, the NP may need to be screened in to appropriate assessment.
- 3.25. The NP area is located approximately 16.3km from Porton Down SPA at its closest point. Therefore, it is considered that the plan area is sufficiently distant from the SPA and known functionally linked habitat, for any development within the plan area to cause direct physical damage to, or fragmentation of, breeding and foraging habitat for the Annex I species stone-curlew. The plan area is also considered too

¹² Solent Maritime SAC, Chichester and Langstone Harbours SPA and Ramsar site, Portsmouth Harbour SPA and Ramsar site, Solent and Southampton Water SPA and Ramsar site

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

remote for development within the plan area to result in anthropogenic disturbance or visual stimuli that could have an adverse effect on stone-curlew breeding at Porton Down SPA.

- 3.26. In terms of the potential to cause physical damage to features which provide habitat for bats, such as breeding, roosting and foraging habitat, and the potential to interrupt or fragment/sever bat flight lines, or to cause disturbance to such features, it is deemed that the NP area is too remote to have implications for bats at the Bath and Bradford on Avon Bats SAC, the Mottisfont Bats SAC or the Chilmark Quarries SAC.

4. Screening of Policies in Grafton Parish Neighbourhood Plan 2025 – 2040 Version 7: December 2024

- 4.1 The Grafton Parish NP comprises 7 policies (Policy 1 is split into 2 parts); these are detailed and assessed in Table 1 below.
- 4.2 There are three policies within the NP that would lead directly to development, namely Policies 1a, 1b and 4, and they allocate three sites within the NP area for residential development of approximately 26 dwellings in total and one site for a community café and associated infrastructure. It is deemed that development at these allocated sites would not result in likely significant effects on any European sites, either alone or in-combination with other plans or projects. Furthermore, it is considered that none of the other policies within the NP would lead directly to development, nor would they result in a likely significant effect on any European sites, either alone or in-combination with other plans or projects. This is due to the nature, scope and scale of the proposals set out in the NP, and on account of the distance of the NP area from any European sites and the absence of a potential pathway for effect.

TABLE 1: Habitats Regulations Assessment Screening of the Grafton Parish Neighbourhood Plan

A / B (Green) – Screened out			
C / D (Red) – Screened in			
Policy	Screening Category	Policy Summary and Assessment under Habitats Regulations	Comments and Recommendations
Policy 1a: Land Adjoining the A338 is allocated for the development of 18 dwellings	B / A1	<p>This policy allocates 2 sites adjoining the A338 for the development of 18 dwellings. The policy lists 14 criteria which a proposal for the site must comply with, including criteria to preserve the dark skies associated with the National Landscape, to retain vegetation on site boundaries and to ensure the amenity of neighbouring properties east and west of the site is preserved.</p> <p>The supporting text states that a comprehensive review of the reasons for refusal for a previous planning application on the southern parcel of land (20/02218/FUL) has been undertaken.</p> <p>The sites allocated in this policy do not fall within any zones of influence (Zol) associated with any European designated sites, therefore the policy will not lead to likely significant effects on any European sites. Developments will be considered at the planning application stage to ensure they comply with this policy, the NPPF and other relevant Development Plan policies.</p>	
Policy 1b: Land west of Grafton Place is allocated for the development of up to 8 dwellings.	B / A1	<p>This policy allocates land to the west of Grafton Place for the development of up to 8 dwellings. The policy lists 11 criteria which a proposal for the site must comply with, including criteria to preserve the dark skies associated with the National Landscape, minimise impacts on protected species such as bats and to provide safe vehicular access to the A388.</p> <p>The site allocated in this policy does not fall within any zones of influence (Zol) associated with any European designated sites, therefore the policy will not lead to likely significant effects on any European sites. Developments will be considered at the planning application stage to ensure they comply with this policy, the NPPF and other relevant Development Plan policies.</p>	
Policy 2: Community Infrastructure	A2	<p>This policy identifies the following as community services and facilities:</p> <ol style="list-style-type: none"> 1. Coronation Hall 2. St Nicholas' Church 	

Policy	Screening Category	Policy Summary and Assessment under Habitats Regulations	Comments and Recommendations
		<p>3. The Swan Inn 4. Wilton Windmill and barn</p> <p>This policy identifies community services and facilities and will not lead to development. Therefore, the policy will not lead to likely significant effects on any European sites. Developments will be considered at the planning application stage to ensure they comply with this policy, the NPPF and other relevant Development Plan policies.</p>	
Policy 3: Local Green Spaces	A2	<p>This policy designates the following as local green spaces:</p> <ul style="list-style-type: none"> • The Green • Wilton Pond and seating area <p>This policy designates local green spaces and will not lead to development. Therefore, the policy will not lead to likely significant effects on any European sites. Developments will be considered at the planning application stage to ensure they comply with this policy, the NPPF and other relevant Development Plan policies.</p>	
Policy 4: Community Cafe	B / A1	<p>This policy allocates land to the east of the Wilton Windmill with shared access for a community café with shop and associated parking. The policy sets out several criteria which proposals would be subject to including requirements for the Design and Access Statement, the requirement for a full Landscape and Visual Impact Assessment and a sensitive lighting design to minimise light pollution and protect the areas dark skies.</p> <p>The site allocated in this policy does not fall within any zones of influence (Zol) associated with any European designated sites, therefore the policy will not lead to likely significant effects on any European sites. Developments will be considered at the planning application stage to ensure they comply with this policy, the NPPF and other relevant Development Plan policies.</p>	
Policy 5: Sustainable Transport	A1	<p>This policy supports proposals to promote improvements to cycling infrastructure, referred to as Grafton Green Lanes, and states that provision should either be directly or indirectly through developer contributions.</p> <p>The policy goes on to state that proposals which are required to make provision of or improvements to the public right of way network should pay regards to the suggested improvements listed in Table 2 of the NP.</p>	

Policy	Screening Category	Policy Summary and Assessment under Habitats Regulations	Comments and Recommendations
		This policy seeks to improve the cycling and public rights of way provision within the NP area and will not lead to development. Therefore, the policy will not lead to likely significant effects on any European sites. Developments will be considered at the planning application stage to ensure they comply with this policy, the NPPF and other relevant Development Plan policies.	
Policy 6: Dark Skies	A1 / A2	<p>This policy states that <i>'All new development that leads to external light emissions will provide evidence that light pollution will be minimised as set out in the supporting text'</i>.</p> <p>This policy seeks to minimise external light emissions and maintain dark skies. The policy will not lead to development, therefore, the policy will not lead to likely significant effects on any European sites. Developments will be considered at the planning application stage to ensure they comply with this policy, the NPPF and other relevant Development Plan policies.</p>	

5 Conclusion

- 5.1 The HRA screening exercise presented in this document has concluded that the Grafton Parish Neighbourhood Plan 2025 – 2040 Version 7: December 2024 will not result in a likely significant effect on any European sites or their qualifying features either alone or in-combination with other plans and projects. Therefore, it has not been necessary to subject the NP to an appropriate assessment under the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019.
- 5.2 It should be noted that if any changes are made to the NP or the policies contained therein, it will be necessary for the amended NP to be subject to a repeat HRA screening exercise before it can be 'made'.

Prepared by Naomi Harvey, Ecologist, Wiltshire Council, 10 March 2025

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