

HARDEN NEIGHBOURHOOD PLAN

HARDEN VILLAGE COUNCIL

DETERMINATION STATEMENT

STRATEGIC ENVIRONMENTAL ASSESSMENT (SEA) SCREENING REPORT

&

HABITATS REGULATION ASSESSMENT (HRA) SCREENING REPORT

PREPARED BY INTEGREAT PLUS

AUGUST 2021



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Abbreviations

CBMDC	-	City of Bradford Metropolitan District Council
HNP	-	Harden Neighbourhood Plan
HRA	-	Habitat Regulations Assessment
HVC	-	Harden Village Council
LPA	-	Local Planning Authority
NPPF	-	National Planning Policy Framework
NPPG	-	National Planning Policy Guidance
SAC	-	Special Area of Conservation
SEA	-	Strategic Environmental Assessment
SPA	-	Special Protection Area
SSSI	-	Site of Special Scientific Interest

1. Introduction to SEA/HRA Determination Statement

1.1 This statement provides the determination (under Regulation 9 of the Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations)) that the draft Harden Neighbourhood Plan (HNP) is unlikely to result in significant environmental effects and therefore does not require a Strategic Environmental Assessment.

This statement also includes the reasons for this determination (in line with Regulation 11 of the SEA Regulations).

This statement also determines that the making of the draft HNP is unlikely to result in any significant effects on any European sites and therefore the HNP does not require a Habitat Regulation Assessment.

The statement also intends to demonstrate that the HNP is compatible with certain European Union obligations as required by the basic conditions, specifically:

- Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment; and
- Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora.

This determination has been made on 24th August 2021. Within 28 days of this determination, Harden Village Council will publish this determination statement in accordance with its regulatory requirements (as per Regulation 11 of the SEA Regulations). Statutory consultees will be sent a copy of this statement and copies of the statement will be available for inspection on Bradford Council's website www.Bradford.gov.uk and on the Village Council's website www.hardenvillagecouncil.gov.uk

1. Determination Statement

1.2 A Strategic Environmental Assessment (SEA) and Habitat Regulations Assessment (HRA) screening opinion was prepared on behalf of Harden Village Council for the draft Harden Neighbourhood Plan. This opinion, included in the appendix to this statement was made available to the statutory environmental bodies (Natural England, Historic England and Environment Agency) for comment in February 2021. Consultation responses were received from all three bodies. Their conclusions are summarised below and detailed responses are included as Appendix 2.

Natural England

Strategic Environmental Assessment & Habitat Regulations Assessment

- It is our advice, on the basis of the material supplied with the consultation, that, in so far as our strategic environmental interests (including but not limited to statutory designated sites, landscapes and protected species, geology and soils) are concerned, **that there are unlikely to be significant environmental effects from the proposed plan.**

Historic England

Strategic Environmental Assessment

- *On the basis of the information supplied, and in the context of the criteria set out in Schedule 1 of the Environmental Assessment Regulations [Annex II of 'SEA' Directive], **Historic England concurs with your conclusion 'that it is unlikely that any significant environmental effects will arise as a result of the Harden Neighbourhood Plan. Consequently the assessment within table 1 concludes (subject to HRA screening outcome), that an SEA is not required when judged against the application of the SEA Directive criteria.'** and that therefore preparation of a Strategic Environmental Assessment is not required.*

Environment Agency

Strategic Environmental Assessment

- *We note that the Council has a responsibility to advise the Parish Council if there is a need for formal Strategic Environmental Assessment of the draft Neighbourhood Plan. You are seeking our views in order to inform the Council's decision on this matter. We have considered the draft plan and its policies against those environmental characteristics of the area that fall within our remit and area of interest. Having considered the nature of the policies in the Plan, **we consider that it is unlikely that significant negative impacts on environmental characteristics that fall within our remit and interest will result through the implementation of the plan.***

In summary, it is determined that the Harden Neighbourhood Plan would not have a significant effect on the environment because:

- It does not allocate land for development
- As detailed in the SEA screening report, the policies were found to have no impacts on the environmental criteria set out in Schedule 1 of the Environmental Assessment Regulations.

The HRA screening concludes that the Neighborhood Plan is not predicted to have any likely significant effects on any European site, either alone or in combination with other plans and projects. Based on the screening opinion prepared by Harden Village Council in April 2021 and having considered the consultation responses from the statutory environmental bodies, Harden Village Council determines that the Harden Neighbourhood Plan is unlikely to result in significant environmental effects and therefore does not require a strategic environmental assessment. This screening determination is applicable to the pre-submission version of the Harden Neighbourhood Plan.

2. INTRODUCTION

- 2.1 This report sets out the screening assessment for the Harden Neighbourhood Plan (HNP). The purpose of screening is to establish if the HNP will require a full Strategic Environmental Assessment (SEA) and/or a Habitat Regulation Assessment (HRA). Sections 6 and 8 shows the conclusions of the screening assessment.
- 2.2 An SEA is a process for evaluating the environmental effects of a plan before it is made. The SEA screening determines whether the plan is likely to have significant environmental effects. If likely significant environmental effects are identified, an environmental report must be produced.
- 2.3 A Habitats Regulations Assessment identifies whether a plan is likely to have a significant effect on a European site, either alone or in combination with other plans or projects. A HRA is required when it is deemed that likely negative significant effects may occur on protected European Sites (Natura 2000 sites) as a result of the implementation of a plan/project. The HRA screening will determine whether significant effects on a European site are likely.
- 2.4 This report explains the legislative background to SEA and HRA screening, provides details of the draft HNP before undertaking a SEA and HRA screening exercise and providing conclusions.
- 2.5 Integreat Plus has prepared this screening report on behalf of the Harden Village Council (HVC) who is the qualifying body for the HNP. Bradford City Council has a responsibility to advise the HVC if there is a need for formal SEA/HRA of the draft plan. One of the basic conditions that will be tested by the independent examiner is whether the making of the neighbourhood plan is compatible with European Union obligations (this includes the SEA Directive).
- 2.6 For the purposes of this assessment the draft version of the plan produced in January 2021 has been screened. This version of the plan is an informal third draft and is considered to be an appropriate stage to undertake the screening assessments as the general scope and content of the plan has emerged and has been informally consulted on with both the community and CBMDC.

3. LEGISLATIVE BACKGROUND

STRATEGIC ENVIRONMENTAL ASSESSMENT

- 3.1 The basis for Strategic Environmental Assessments and Sustainability Appraisal legislation is European Directive 2001/42/EC and was transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004, or SEA Regulations. Detailed Guidance of these regulations can be found in the Government publication 'A Practical Guide to the Strategic Environmental Assessment Directive' (ODPM 2005).

3. LEGISLATIVE BACKGROUND

STRATEGIC ENVIRONMENTAL ASSESSMENT

3.2 The Planning and Compulsory Purchase Act 2004 required Local Authorities to produce Sustainability Appraisals (SA) for all local development documents to meet the requirement of the EU Directive on SEA. It is considered best practice to incorporate requirements of the SEA Directive into an SA as discussed within the NPPF at paragraph 165. However, the 2008 Planning Act amended the requirement to undertake a Sustainability Appraisal for only development plan documents (DPD's), but did not remove the requirement to produce a Strategic Environmental Assessment. As a Neighbourhood Plan is not a development plan document it therefore does not legally require a Sustainability Appraisal. Where appropriate, however, an SEA still needs to be undertaken in line with the SEA regulations.

3.3 In February 2015 amendments to the Neighbourhood Plan Regulations came into force. Regulation 2(4) of these amendments adds additions to the list of documents that a qualifying body must submit to a local planning authority with a Neighbourhood Plan. The additional document which must be submitted is either an environmental report prepared in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004, or a statement of reasons why an environment assessment is not required. The amendment to the Regulations is to ensure that the public can make informed representations and that independent examiners have sufficient information before them to determine whether a neighbourhood plan is likely to have significant environmental effects.

3.4 The legislation advises that draft neighbourhood plan proposals should be assessed to determine whether the plan is likely to have significant environmental effects. This process is commonly referred to as a 'screening' assessment and the requirements are set out in regulation 9 of the Environmental Assessment of Plans and Programmes Regulations 2004. The regulations state that before an authority makes a determination on a plan it should:

- a) Take into account the criteria for determining the likely significance of effects on the environment specified in schedule 1 of the Regulations.
- b) Consult the environmental consultation bodies.

3.5 The National Planning Practice Guidance (NPPG) provides further guidance on SEA screening. It advises that whether a neighbourhood plan proposal requires a Strategic Environmental Assessment, and (if so) the level of detail needed, will depend on what is proposed. A SEA may be required, for example, where:

- A neighbourhood plan allocates sites for development.
- The neighbourhood area contains sensitive natural or heritage assets that may be affected by proposals in the plan.
- The neighbourhood plan is likely to have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan.

3.6 Where it is determined that the plan is unlikely to have significant environmental effects, and accordingly, does not require an environmental assessment, the authority is required to prepare a statement for its reasons for the determination. If likely significant environmental effects are identified then an environmental report must be prepared in accordance with paragraphs (2) and (3) of regulation 12 of the Environmental Assessment of Plans and Programmes Regulations 2004.

3. LEGISLATIVE BACKGROUND

HABITATS REGULATIONS ASSESSMENT

- 3.7 Habitats Regulations Assessment (HRA) has its origins in European law under the Habitats Directive. This has been translated into UK law via Conservation of Habitats and Species Regulations 2019 as amended (known as the Habitats Regulations).
- 3.8 Article 6 (3) of the EU Habitats Directive and regulation 63 of the Conservation of Habitats and Species Regulations 2019 as amended (known as the Habitats Regulations), require that an appropriate assessment is carried out with regard to the Conservation Objectives of the European Sites and with reference to other plans and projects to identify if any significant effect is likely for any European Site.
- 3.9 The NPPG advises that it is required to determine whether significant effects on a European site can be ruled on the basis of objective information. If the conclusion of the screening is that the plan is likely to have a significant effect on a European site then an appropriate assessment of the implications of the plan for the site, in view of the site's conservation objectives, must be undertaken. If a plan is one which has been determined to require an appropriate assessment under the Habitats directive then it will normally also require a SEA.

4. HARDEN NEIGHBOURHOOD PLAN

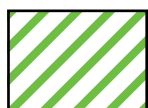
- 4.1 Whether a Neighbourhood Plan requires an SEA or HRA depends on what is being proposed in the plan. The draft HNP includes locally specific policies and guidance for the plan area but importantly does not allocate any sites for development.
- 4.2 This section of the report sets out the context of the Harden and details the characteristics of the Plan Area.

The HNP Area is a small rural community situated 7 miles northwest of Bradford City centre. The population of Harden is around 2,000 people. There is one conservation area within Harden named Ryecroft. It is a small agricultural settlement west of the village centre. There are many listed buildings and monuments in Harden, including a listed landscape (St Ives Country Park). Locally there are several Local Wildlife Sites and sites within the Bradford Wildlife Habitat Network. There are limited employment opportunities locally with only minimal local businesses and facilities or services.

There are no designated sites within the HNP area but within a 10km buffer there are: Bingley South Bog SSSI, Trench Meadows SSSI, Yeadon Brickworks and Railway Cutting SSSI, South Pennine Moors SSSI, Crimsworth Dean SSSI. There is also South Pennine Moors SAC and South Pennine Moors Phase 2 SPA.

4. HARDEN NEIGHBOURHOOD PLAN

The HNP boundary with 10km buffer, layers showing SSSI, SPA, SAC



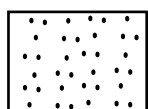
Sites of Special Scientific Interest (SSSI)



10km buffer



Special Area of Conservation (SAC)



Special Protection Area (SPA)



Harden Neighbourhood Plan Boundary

4. HARDEN NEIGHBOURHOOD PLAN

4.4 VISION

Harden will be a vibrant, inclusive, sustainable rural community, with attractive green spaces and high quality housing and facilities, making it a desirable place for people to live and enjoy, now and into the future.

4.5 AIMS & OBJECTIVES

1. Improve resilience to the effects of, and take urgent action against, the climate emergency, working towards becoming a sustainable and low-carbon village.
2. Ensure that new housing meets local needs both now and in the future.
3. Promote high quality design in all new developments, which responds to and reinforces local character and is built to high levels of sustainable design and performance.
4. Conserve and enhance green spaces, heritage assets and the character of the village for everyone to enjoy now and in the future, including access and amenity, and provision of allotments/community gardening.
5. Improve pedestrian and cycle infrastructure and support and enable greater use of sustainable and healthy transport methods, and greater mobility for all.
6. Work towards better management of parking issues in the village centre that negatively affect the community.
7. Encourage new leisure and recreational opportunities, especially for young people.
8. Protect existing facilities, and support the expansion and development of new community facilities in line with local needs and aspirations.
9. Protect existing businesses and encourage appropriate new business activity.
10. Encourage better, high-speed internet coverage.

4. HARDEN NEIGHBOURHOOD PLAN

4.6 POLICIES

HOUSING

POLICY H1: SUSTAINABLE DESIGN & RENEWABLE ENERGY

Policy encouraging development of homes to be designed with sustainable principles in mind and incorporating renewable energy technologies.

POLICY H2: HOUSE TYPE & MIX

Policy encouraging a certain mix of housing in line with community needs.

POLICY H3: HIGH QUALITY DESIGN

Policy encouraging high quality design that relates to the Harden Design Code.

POLICY H4: HOMEWORKING

Policy promoting new residential development to include space to facilitate homeworking

POLICY H5: BUILDING FOR A HEALTHY LIFE & LIFETIME HOMES

Policy promoting homes to be built to Lifetime Homes standards and to include Building for a Healthy Life Assessments

POLICY H6: HIGH-SPEED BROADBAND

Policy encouraging enhanced broadband connections

4. HARDEN NEIGHBOURHOOD PLAN

4.6 POLICIES

TRANSPORT & MOVEMENT POLICIES

POLICY TM1: HARDEN TO BINGLEY ACTIVE TRAVEL

Policy encouraging and supporting a new active travel corridor connecting to Bingley

POLICY TM2: ELECTRIC VEHICLE CHARGING POINTS

Policy encouraging new developments to include EV charging points

POLICY TM3: PARKING SOLUTIONS

Policy encouraging new dwellings to provide cycle storage, adequate parking space and setting minimum internal dimensions of garages

POLICY TM4: PEDESTRIAN & CYCLE CONNECTIONS

Policy encouraging developments to connect with existing pedestrian and cycle connections

COMMUNITY FACILITIES & SERVICES POLICIES

POLICY C1: COMMUNITY INFRASTRUCTURE LEVY

Policy promoting use of CIL funds on active travel and local biodiversity

POLICY C2: COMMUNITY ENERGY SCHEMES

Policy supporting community energy schemes

POLICY C3: COMMUNITY FACILITIES & SERVICES

Policy supporting retention of essential community facilities and services

POLICY C4: ENHANCING THE VILLAGE CENTRE

Policy supporting proposals that enhance the public realm in the village centre

GREEN SPACES POLICIES

POLICY GS1: GREEN INFRASTRUCTURE

Policy requiring proposals to provide biodiversity net gain, connect with and enhance green infrastructure and biodiversity

POLICY GS2: HARDEN WILDLIFE & HABITAT NETWORK

Policy supporting biodiversity enhancements on local wildlife sites in line with their objectives

POLICY GS4: LOCAL GREEN SPACES

Designation of 5 sites to be Local Green Spaces

4. HARDEN NEIGHBOURHOOD PLAN

4.6 HERITAGE POLICIES

POLICY HT1: HERITAGE

Designation of 46 properties as Non-designated Heritage Assets

POLICY HT2: STONE WALLS

Policy supporting retention of stone walls

POLICY HT3: KEY VIEWS

Policy identifying key views and seeking their retention

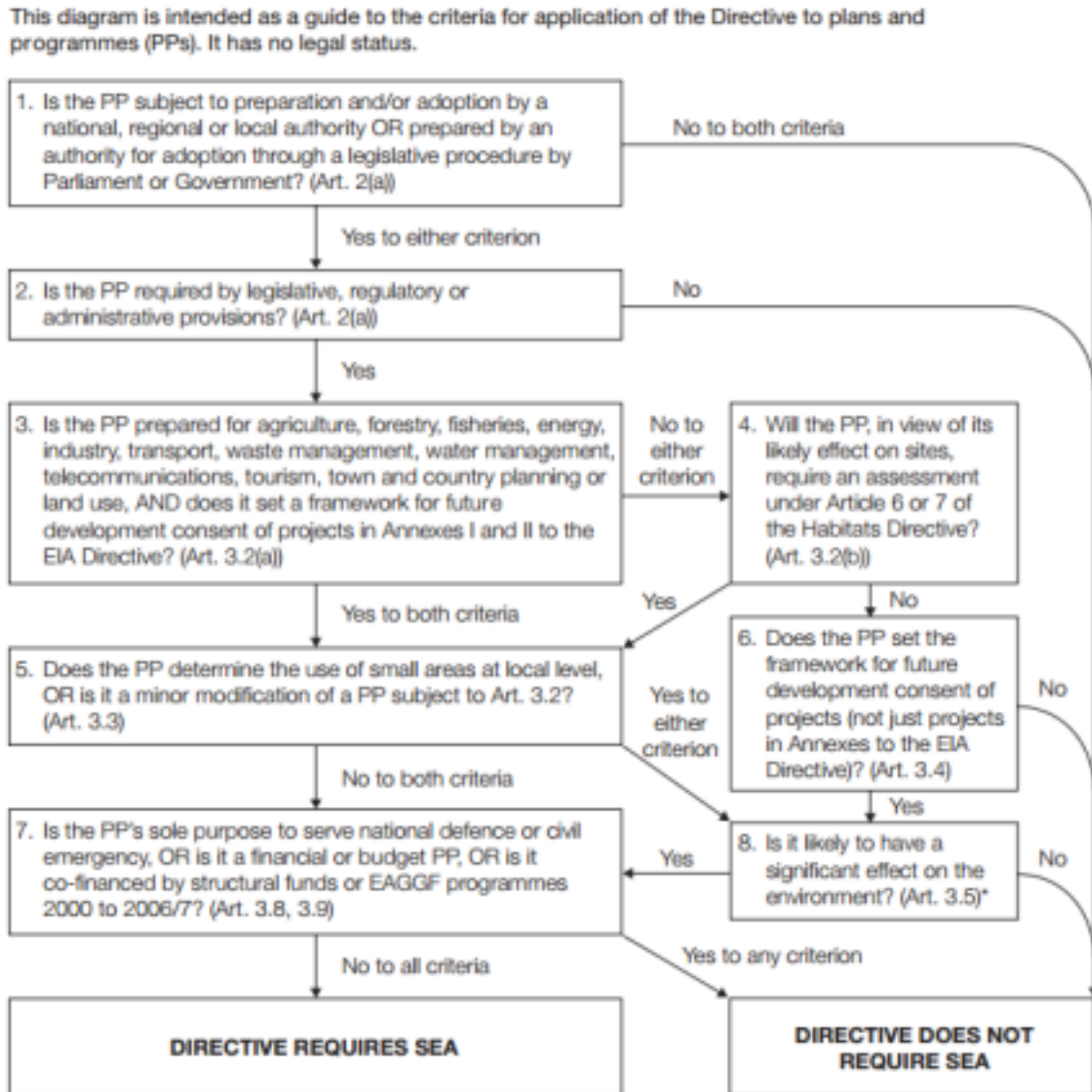
BUSINESS & EMPLOYMENT POLICY

POLICY BE1: BUSINESS & EMPLOYMENT

Policy supporting new small scale commercial enterprise, development of co-working space

5. STRATEGIC ENVIRONMENTAL ASSESSMENT

The flowchart below illustrates the process for screening a planning document to ascertain whether a full SEA is required:



*The Directive requires Member States to determine whether plans or programmes in this category are likely to have significant environmental effects. These determinations may be made on a case by case basis and/or by specifying types of plan or programme.

5. STRATEGIC ENVIRONMENTAL ASSESSMENT

Table 1:
Application of the SEA Directive to the Harden Neighbourhood Plan

STAGE	YES/NO	REASON
1. Is the Plan subject to preparation and/or adoption by a national, regional or local authority or prepared by an authority through a legislative procedure by Parliament or Government? (Article 2(a))	Yes	Neighbourhood Plans are prepared by a qualifying body (Village Council) under the Town and Country Planning Act 1990 (as amended). This Neighbourhood Plan is prepared by Harden Village Council (as the “relevant body”) and will be ‘made’ by City of Bradford Metropolitan District Council as the Local Authority, if successful at referendum. The preparation of Neighbourhood Plans is subject to The Neighbourhood Planning (General) Regulations 2012 and The Neighbourhood Planning (Referendums) Regulations 2012.
2. Is the Plan required by legislative, regulatory or administrative provisions? (Article 2(a))	No	Communities have the right to produce a Neighbourhood Plan. However, communities are not required by legislative, regulatory or administrative purposes to produce a Neighbourhood Plan. However, if ‘made’, the Harden Neighbourhood Plan would form part of the statutory development plan; it is therefore considered necessary to answer the following questions to determine further if SEA is required.
3. Is the Plan prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, telecommunications, tourism, town and country planning or land use, and does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive? (Article 3.2(a))	Yes	A Neighbourhood Plan can include these policy areas and could provide, at a Neighbourhood Area level, the framework for development that would fall within Annex II of the EIA Directive. Developments that fall within Annex I are ‘excluded’ development for Neighbourhood Plans, as set out in Section 61(k) of the Town and Country Planning Act 1990 (as amended). It is not anticipated that the Harden Neighbourhood Plan would be the tool to manage development of the scale and nature envisaged by Annex I and Annex II of the EIA Directive.
4. Will the Plan, in view of its likely effects on sites, require an assessment of future development under Article 6 or 7 of the Habitats Directive? (Article 3.2(b))	No	The screening section for the HRA is included later in this report.

5. STRATEGIC ENVIRONMENTAL ASSESSMENT

Table 1:
Application of the SEA Directive to the Harden Neighbourhood Plan

STAGE	YES/NO	REASON
5. Does the Plan determine the use of small areas at local level or is it a minor modification of a plan or proposal subject to Article 3.2? (Article 3.3)	Yes	Once made the HNP will be part of the land use framework for the area and will help determine the use of small areas at the local level.
6. Does the Plan set the framework for future development consent of projects (not just projects in annexes to the EIA Directive)? (Article 3.4)	Yes	The HNP will form part of the statutory Development Plan and will be used in the determination of planning applications in the Neighbourhood Area. Therefore, it sets the framework for future developments at a local level within the context of the Bradford Core Strategy and the NPPF. The plan gives support to certain types of development and projects within the plan area but these conform to the strategic aims of the Core Strategy.
7. Is the Plan's sole purpose to serve the national defence or civil emergency, or is it a financial or budget plan or proposal, or is it co-financed by structural funds or EAGGF programmes 2000 to 2006/7? (Article 3.8, 3.9)	No	The Harden Neighbourhood Plan does not deal with these issues.
8. Is it likely to have a significant effect on the environment? (Article 3.5)	No	<p>The Neighbourhood Plan does not propose any significant development but instead provides guidance on how local people would like to see the area developed. The plan contains both policies and design guidance which seek to protect and enhance natural and historic assets. The plan promotes the safeguarding of wildlife and biodiversity and encourages the creation of wildlife corridors and green buffers. It supports green and renewable energy technologies and promotes sustainable transport methods. The plan supports local economic development that is of appropriate in terms of siting, location and type.</p> <p>It is therefore considered unlikely the plan will have a significant effect on the environment.</p>

5. STRATEGIC ENVIRONMENTAL ASSESSMENT

The criteria for determining the likely significance of effects referred to in Article 3(5) of Directive 2001/42/EC are set out below in Figure 2.

FIGURE 2 - CRITERIA FOR DETERMINING LIKELY SIGNIFICANT EFFECTS

1. The characteristics of plans and programmes, having regard, in particular, to

- the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources,
- the degree to which the plan or programme influences other plans and programmes including those in a hierarchy,
- the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development,
- environmental problems relevant to the plan or programme,
- the relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste-management or water protection).

2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to

- the probability, duration, frequency and reversibility of the effects,
- the cumulative nature of the effects,
- the trans-boundary nature of the effects,
- the risks to human health or the environment (e.g. due to accidents),
- the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected),
- the value and vulnerability of the area likely to be affected due to:
 - special natural characteristics or cultural heritage,
 - exceeded environmental quality standards or limit values,
 - intensive land-use,
 - the effects on areas or landscapes which have a recognised national, community or international protection status.

5. Table 2:
Assessment of the likelihood of significant effects on the environment

Criteria (Schedule 1)	
The characteristics of plans and programmes, having regard, in particular, to:	
(a) the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources.	<p>Alongside the Local Plan (currently the Replacement Unitary Development Plan 2005 alongside the Core Strategy adopted in 2017), the HNP will provide a statutory development plan for the area. This mean planning applications will be determined against its policies and design guidance. The policies can be categorised into the following themes:</p> <p>Protection & enhancement policies Natural and historic environment, green infrastructure, local green spaces, footpaths and cycle ways, community facilities and services</p> <p>Design & development policies Ensuring high quality design, parking and street design guidance, housing type and mix, SUDS, green and renewable technologies</p> <p>Aspirational & encouragement policies Broadband, homeworking spaces, small-scale business space, lifetime homes and building for life standards.</p>
(b) the degree to which the plan or programme influences other plans and programmes including those in a hierarchy.	<p>The Harden Neighbourhood Plan dovetails the Bradford Core Strategy and the NPPF and is in-line with the strategic context of both documents. It adds fine-grain, locally specific policies which complement and add value to higher-level plans. It is unlikely to influence other Plans and programmes as this Plan is at the bottom of the planning hierarchy.</p>
(c) The relevance of the plan for the integration of environmental considerations in particular with a view to promoting sustainable development;	<p>The Plan promotes sustainable development, defined as “meeting the needs of the present generation without compromising the ability of future generations to meet their own needs.” It has an emphasis on protecting the natural environment, wildlife, biodiversity, promoting better flood and water management and protecting heritage and historic assets. It promotes greater use of existing buildings. These are included in both policy and design guidance. Before the plan is made it will go through the basic conditions test, this includes a requirement to contribute towards sustainable development.</p>

5. Table 2:
Assessment of the likelihood of significant effects on the environment

Criteria (Schedule 1)	
The characteristics of plans and programmes, having regard, in particular, to:	
d) Environmental problems relevant to the plan;	<p>There are no nationally or internationally designated sites within the Plan Area.</p> <p>There are however 5 sites of international nature conservation importance within a 10km buffer:</p> <p>Bingley South Bog SSSI 4.0(ha)</p> <p>This small mire occupies a peat-filled hollow in undulating ground between the Leeds Liverpool Canal and the River Aire, at Bingley, north of Bradford.</p> <p>Despite drainage and hydroseral succession, the surviving wetland provides a transition from fen to damp neutral grassland, maintained in a species-rich condition, probably by grazing. Open water occurs in a depression caused by the weight of an aqueduct embankment.</p> <p>This central swamp is dominated by water horsetail <i>Equisetum fluviatile</i>, with common spikerush <i>Eleocharis palustris</i>, broad-leaved pondweed <i>Potamogeton natans</i>, thread-leaved crowfoot <i>Ranunculus trichophyllus</i> and mare's-tail <i>Hippuris vulgaris</i>. The last two species are relatively rare in West Yorkshire.</p> <p>Even rarer in the region, the marsh cinquefoil <i>Potentilla palustris</i> is widespread in the surrounding damp transitional fen, extending both into the open water and into the grasslands.</p> <p>The mosaic of neutral grassland and transitional fen supports large quantities of a number of sedges. These include brown sedge <i>Carex disticha</i> – regionally uncommon – hammer sedge <i>C. hirta</i>, yellow sedge <i>C. demissa</i>, oval sedge <i>C. ovalis</i>, carnation sedge <i>C. panicea</i>, glaucous sedge <i>C. flacca</i> and common sedge <i>C. nigra</i>, together with a broad diversity of other marshland plants.</p>

5. Table 2:
Assessment of the likelihood of significant effects on the environment

Criteria (Schedule 1)	
The characteristics of plans and programmes, having regard, in particular, to:	
d) Environmental problems relevant to the plan;	<p>There are no nationally or internationally designated sites within the Plan Area.</p> <p>There are however 5 sites of international nature conservation importance within a 10km buffer:</p> <p>Trench Meadows SSSI 4.69(ha)</p> <p>Trench Meadows are situated in the River Aire valley between the towns of Shipley and Bingley, on the fringe of the Southern Pennines. Occupying a gently-sloping, south facing position, the meadows lies on boulder clay deposits overlying Millstone Grit. The meadows are of special interest for their neutral grassland, which occurs with smaller areas of acid grassland and rush pasture, the latter associated with a number of flushes which run downslope through the fields.</p> <p>The neutral grassland is rich in plant species, with the grasses red fescue <i>Festuca rubra</i>, sweet vernal-grass <i>Anthoxanthum odoratum</i>, crested dog's-tail <i>Cynosurus cristatus</i>, and the herbs black knapweed <i>Centaurea nigra</i> and bird's-foot-trefoil <i>Lotus corniculatus</i> all typical for the habitat, and being found frequently. However, it is the occurrence of heath grass <i>Danthonia decumbens</i>, together with the herbs devil's-bit scabious <i>Succisa pratensis</i>, tormentil <i>Potentilla erecta</i> and betony <i>Stachys officinalis</i>, through the sward, which characterise this particular community. These are among a number of plant species within the neutral grassland which indicate slightly acidic soils, and reflect the underlying parent material. Unimproved speciesrich lowland grassland of this type is now a nationally rare habitat. Acid grassland can be found within the meadows where the soils are thinner and the parent material exerts a greater influence on the vegetation. The presence of wavy hair-grass <i>Deschampsia flexuosa</i>, mat grass <i>Nardus stricta</i> and heath bedstraw <i>Galium saxatile</i> in the sward, together with an increased abundance of common bent <i>Agrostis capillaris</i> and sheep's fescue <i>Festuca ovina</i> distinguish the acid grassland from the more widespread neutral grassland. Three large flushes also occur within the meadows. These have a distinctive suite of plant species associated with them, including sharp-flowered rush <i>Juncus acutiflorus</i>, marsh bedstraw <i>Galium palustre</i>, lesser spearwort <i>Ranunculus flammula</i>, meadowsweet <i>Filipendula ulmaria</i>, and</p>

5. Table 2:
Assessment of the likelihood of significant effects on the environment

Criteria (Schedule 1)	
The characteristics of plans and programmes, having regard, in particular, to:	
d) Environmental problems relevant to the plan;	<p>There are no nationally or internationally designated sites within the Plan Area.</p> <p>There are however 5 sites of international nature conservation importance within a 10km buffer:</p> <p>Yeadon Brickworks And Railway Cutting 3.3(ha)</p> <p>This quarry and adjacent railway cutting display an excellent section through the rocks of late Namurian age, and the importance of this site is recognised by its being the type locality for the Yeadonian Stage. The site, with its exposures of the <i>Gastrioceras cumbriense</i> Marine Bank and, more importantly, the <i>G. cancellatum</i> Marine Band, marking the base of the Yeadonian, is thus a section of considerable stratigraphic significance in a national and international context.</p> <p>In layman's terms, the interest of this site may be expressed more simply, and such a statement is provided below. This should not be taken as definitive and further information as to details of the interest can be obtained from the Nature Conservancy Council.</p> <p>The rock exposures within this site provide a most important cross-section through shales and sandstones of the Namurian Series, originally formed about 350 million years ago during the Carboniferous Period of geological history. The shales include important layers rich in the fossil remains of marine animals known as goniatites, which enable geologists to accurately date the rocks and to compare these shales with other rocks of similar age elsewhere in Britain and overseas. The significance of these exposures is widely recognised by geologists and this site has been proposed as the standard for one of the major subdivisions of the Carboniferous Period, named the Yeadonian Stage.</p>

5. Table 2:
Assessment of the likelihood of significant effects on the environment

Criteria (Schedule 1)	
The characteristics of plans and programmes, having regard, in particular, to:	
d) Environmental problems relevant to the plan;	<p>There are no nationally or internationally designated sites within the Plan Area.</p> <p>There are however 5 sites of international nature conservation importance within a 10km buffer:</p> <p>Crimsworth Dean SSSI 13.8 (ha)</p> <p>A nationally important section exhibiting a sequence of rocks of the Namurian Kinderscoutian Stage, with a number of well developed marine bands present. The section is of considerable importance as it has been proposed as the stratotype for the upper part of the R1 Stage (highest Kinderscoutian), and in conjunction with the River Darwen, provides a complete reference section for the entire Kinderscoutian time interval.</p> <p>In layman's terms, the interest of this site may be expressed more simply, and such a statement is provided below. This should not be taken as definitive and further information as to details of the interest can be obtained from the Nature Conservancy Council.</p> <p>The bed and banks of Crimsworth Dean Beck provide exposures of a series of rock-layers of the Namurian Series formed during the Carboniferous Period of geological history about 320 million years ago. The rocks consist mainly of shales and sandstones formed by the accumulation of sediment on a vast delta, built by a major river which flowed southwards from uplands in Scotland. Some of the shales contain the fossilised remains of marine animals which accumulated during periods when the delta became submerged beneath sea-level. These marine layers are most important as they have enabled geologists to accurately date the rocks, making possible precise comparisons with rocks of similar age elsewhere in Britain and overseas. This river valley is recognised by geologists as a most important section and has been proposed as the standard or "type-locality" for part of one of the major subdivisions of the Carboniferous Period, known as the Kinderscoutian Stage.</p>

5. Table 2:
Assessment of the likelihood of significant effects on the environment

Criteria (Schedule 1)	
The characteristics of plans and programmes, having regard, in particular, to:	
d) Environmental problems relevant to the plan;	<p>Biodiversity: 2 sites of international nature conservation importance, i.e. South Pennine Moors SAC and SPA (incorporating South Pennine Moors SSSI – NB large part of area within SSSI Impact Risk Zone). The South Pennine Moors SPA/SAC covers an area of moorland of 65,024 hectares in northern England.</p> <p>SPA citation – an upland of international importance providing habitat for an important assemblage of breeding moorland and moorland fringe birds. SAC citation - hosts the following habitats listed in Annex I: • Blanket bogs* • European dry heaths • Northern Atlantic wet heaths with Erica tetralix. (Wet heathland with cross-leaved heath) • Old sessile oak woods with Ilex and Blechnum in the British Isles. (Western acidic oak woodland) • Transition mires and quaking bogs.</p> <p>Fauna: South Pennine Moors SPA supports nationally important breeding populations of 2 Annex 1 bird species – merlin & golden plover. Supports, in summer, diverse assemblage of breeding migratory birds of moorland and moorland fringe habitats, including golden plover, lapwing, dunlin, snipe, curlew, redshank, common sandpiper, short-eared owl, whinchat, wheatear, ring ouzel and twite. Supports southernmost assemblage in Britain of breeding merlin, red grouse, golden plover, dunlin, short-eared owl and twite.</p> <p>Flora: SPA/SAC flora characteristic of upland heathland (dry and wet), blanket bog (including uncommon cloudberry), old sessile oak woods and transition mires and quaking bogs.</p> <p>Water - Harden Beck, Local Wildlife Site, breeding population of Brown Trout</p>

5. Table 2:
Assessment of the likelihood of significant effects on the environment

Criteria (Schedule 1)	
The characteristics of plans and programmes, having regard, in particular, to:	
e) the relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste-management or water protection)	There are no conflicts between the HNP and statutory plans linked to waste, water etc.

5. Table 2:
Assessment of the likelihood of significant effects on the environment

<p>2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:</p>	
<p>(a) The probability, duration, frequency and reversibility of the effects</p>	<p>The plan does not allocate any sites for development. It does contain several policies and design guidance which seek to protect and enhance the natural and historic environment, including heritage assets, wildlife and biodiversity. It is unlikely the HNP will lead to any environmental effects that have not already been raised and addressed by the Core Strategy. The policies which do promote or encourage any form of development</p>
<p>(b) The cumulative nature of the effects</p>	<p>The cumulative effects of proposals within the NP are unlikely to be significant on the local environment. The effects of the NP need to be considered alongside the Bradford Core Strategy. The NP is required to be in general conformity with the emerging Bradford Local Plan. It is not considered that the NP introduces significant additional effects over and above those already considered in the SA/SEA for the Local Plan. Notably the NP does not propose more development than the Local Plan for the area. It is therefore unlikely the culmination of the plans will have an effect.</p>
<p>(c) The transboundary nature of the effects</p>	<p>The proposals within the NP are unlikely to have a significant impact beyond the Neighbourhood Area boundary.</p>
<p>(d) The risks to human health or the environment (e.g. due to accidents)</p>	<p>None identified</p>
<p>(e) The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected),</p>	<p>The NP is concerned with development within the Harden Neighbourhood Area. The potential for environmental impacts are likely to be local, limited and minimal. CBMDC have allocated around 25 houses over the next 15 years. The population of Harden is currently around 2,000 people.</p>
<p>(f) The value and vulnerability of the area likely to be affected due to:</p> <ul style="list-style-type: none"> • special natural characteristics or cultural heritage, • exceeded environmental quality standards or limit values, • intensive land-use 	<p>The NP is unlikely to adversely affect the value and vulnerability of the area in relation to its special natural characteristics or cultural heritage. The policies within the plan seek to provide greater protection to the character of the area. The NP does not allocate any sites for development.</p>
<p>(g) The effects on areas or landscapes which have a recognised national, Community or international protection status</p>	<p>It is not considered that the draft policies in the NP will adversely affect areas or landscapes which have a recognised national, community or international protection status. There are no AONBs within the plan area.</p>

6. ASSESSMENT OF HNP POLICIES

6.1 HOUSING POLICIES

This section of the plan relates to housing. In summary it aims to encourage sustainable design and renewable energy technologies (H1), encourage a mix of house types to meet local needs (H2), promotes high quality design (H3), encourage space for homeworking (H4), encourages use of Lifetime Homes standards and Building for a Healthy Life assessments (H5), encourages high speed broadband (H6).

6.2 TRANSPORT & MOVEMENT POLICIES

This section of the plan relates to transport and movement. In summary it aims to encourage new active travel routes connecting to Bingley (TM1), encourages installation of EV charging points (TM2), proposes parking solutions that include cycle storage and minimum internal dimensions of garages (TM3), encourages improved pedestrian and cycle connections (TM4).

6.3 COMMUNITY FACILITIES AND SERVICES POLICIES

This section of the plan relates to community facilities and services. In summary it aims to allocate CIL funds to support active travel locally (C1), support community energy schemes (C2), protect community services and facilities (C3), and supports enhancements to the public realm in the village centre (C4).

6.4 GREEN SPACE POLICIES

This section of the plan relates to green spaces and biodiversity. In summary it aims to encourage all new developments to include green infrastructure, achieve biodiversity net gain (GS1), support local wildlife and biodiversity enhancements (GS2), promote and support retention of mature trees and encourage tree planting (GS3), designation of 5 Local Green Spaces.

6.5 HERITAGE POLICIES

This section of the plan relates to local heritage. In summary it seeks to designate 46 properties as non-designated heritage assets (HT1), retain stone walls (HT2) and protect key local views (HT3)

6.6 BUSINESS AND EMPLOYMENT POLICY

This section of the plan relates to business and employment. In summary it gives support to new small-scale commercial enterprise to support the needs of the community, in addition to the creation of co-working spaces (BE1).

7. SEA SCREENING CONCLUSION

7.1 In conclusion, as a result of the assessment carried out in Table 2 above and the more detailed consideration of the draft policies, it is considered that it is unlikely that any significant environmental effects will arise as a result of the Harden Neighbourhood Plan. Consequently, the assessment within Table 1 concludes (subject to HRA screening outcome), that an SEA is not required when judged against the application of the SEA Directive criteria. This section will be updated once the screening opinions from statutory consultees has been received.

7.2 Notably, the draft neighbourhood plan does not propose any allocations. No sensitive natural or heritage assets will be significantly affected by proposals within the plan as they seek to protect and, where possible, enhance them. The plan contains several policies which seek to protect and in places enhance the natural environment including access to and management of. The plan supports both renewable and green energy and promotes sustainable transport methods. The neighbourhood plan's policies seek to guide development within the Neighbourhood Area and are required to be in general conformity with those within the Local Plan. It is unlikely that there will be any significant additional environmental effects that have not already been considered and dealt with through a SEA/SA of the Local Plan.

8. HRA SCREENING

8.1 The HRA involves an assessment of any plan or project to establish if it has potential implications for European wildlife sites. The HRA will consider if the proposals in the neighbourhood plan have the potential to harm the habitats or species for which European wildlife sites are designated. European wildlife sites are:

- Special Protection Areas (SPA) designated under the Birds Directive (79/409/EEC)
- Special Areas of Conservation (SAC) designated under the Habitats Directive (92/43/EEC).

8.2 This section of the report:

- Identifies the European sites within 10km of the plan area
- Summarises the reasons for designation and conservation objectives for each of the sites which have an impact risk zone stretching into the plan area
- Screens the NDP for its potential to impact upon European sites
- Assesses the potential for in-combination effects from other projects and plans in the area

8.3 EUROPEAN SITES WITHIN 10KM OF THE NDP AREA

There are two European sites within a 10km radius of the Harden Neighbourhood Plan area. These are:

- South Pennine Moors Phase 2 SPA
- South Pennine Moors SAC

The South Pennine Moors SPA/SAC covers an area of moorland of 65,024 hectares in northern England stretching at its southern point from just north of Matlock in Derbyshire all the way north to Ilkley in West Yorkshire. Part of the South Pennine Moors fall within the HNP boundary.

A map illustrating the proximity between HNP area the above sites is contained in 3.3 of the document.

8. HRA SCREENING

REASONS FOR DESIGNATION & CONSERVATION OBJECTIVES OF EUROPEAN SITES WITHIN 10KM RADIUS OF HNP

8.4 The South Pennine Moors Phase 2 Special Protection Area (SPA)

The site qualifies under Article 4.1 of the EC Directive on the Conservation of Wild Birds by supporting nationally important breeding population of two species listed in Annex I:

- Merlin (*Falco columarius*)
- Golden Plover (*Pluvialis apricaria*)

The site qualifies under Article 4.2 by supporting a diverse assemblage of breeding migratory birds of moorland and moorland fringe habitats including golden plover, lapwing, dunlin, snipe, curlew, redshank, common sandpiper, short eared owl, whinchat, wheatear, ring ouzel and twite.

8.5 The Conservation Objectives for the South Pennine Moors Phase 2 Special Protection Area (SPA) are published by Natural England. They are:

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

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

8.6 The South Pennine Moors Special Area of Conservation (SAC)

The site is designated under article 4(4) of the Directive (92/43/EEC) as it hosts the following habitats listed in Annex I:

- Blanket bogs
- European dry heaths
- Northern Atlantic wet heaths with *Erica tetralix*.
- Old sessile oak woods with *Ilex* and *Blechnum* in the British Isles.
- Transition mires and quaking bogs.

8.7 The Conservation Objectives for the South Pennine Moors SAC are published by Natural England. They are:

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

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

8. HRA SCREENING

8.8 What possible impacts on the European Sites should be considered as part of the HRA screening on the NP?

The appropriate assessment (2015) undertaken for the Bradford District Core Strategy provides useful context to the HRA screening for the HNP. This led to the identification of a range of likely significant effects on the South Pennine Moorlands that could result from the Core Strategy for Bradford District.

Impact pathways considered for likely significant effects on the European sites as part of the HRA work for the Core Strategy were:

- Loss of supporting habitats (directly or indirectly);
- Increased water demand;
- Impacts on water quality;
- Increased emissions to air;
- Collision mortality risk and displacement due to wind turbine developments;
- Recreational impacts, including walkers, dogs, trampling and erosion; and
- A range of urbanisation impacts, including fly-tipping, invasive species, wildfire and increased predation

8.9 The findings of the Core Strategy appropriate assessment were that:

- Adverse effects resulting from wind turbine development, increased water demand or impacts on water quality are not considered likely for any of the European sites.
- Loss of supporting habitats and urbanisation impacts are assessed as likely to affect the South Pennine Moors SAC/SPA, however, they are considered to be adequately avoided and mitigated by the policy response in Core Strategy Policy SC8.
- Recreational impacts are assessed as potentially affecting any of the four sites, however, they are considered to be adequately avoided and mitigated by the Core Strategy policy response.
- The distribution and magnitude of impacts differs between the four designated areas. Evidence is presented to indicate that, if left unmitigated, impacts are likely to be greater in relation to the South Pennine Moors due to their relative proximity to locations for future development and high levels of accessibility, a key influence on the numbers of people visiting the sites and associated impacts

The possible impacts identified as part of the HRA work on the Core Strategy have been taken into account to identify the following impact pathways to be considered for likely significant effects on the European sites as a result of the NP.

- Loss of supporting habitats and urbanisation impacts on the South Pennine Moors SAC/SPA
- Recreational impacts arising from an increase in the number of people visiting the sites

8. HRA SCREENING

8.10 ASSESSMENT OF THE LIKELY EFFECTS OF THE NEIGHBOURHOOD PLAN

Some of the policies in the draft HNP are aimed at shaping how development comes forward and do not themselves guide where development comes forward or lead to additional development coming forward. Such policies need not be considered for their impact on European site and can be ruled out at an early stage of screening.

The table below lists every proposed policy in the draft HNP, provides a summary of what it seeks to achieve and identifies whether or not it is a policy that can be ruled out of the HRA screening assessment. The screening report will then focus on those policies of the HNP which have not been ruled out.

Table 3.

Identification of policies which do not either guide where development comes forward or lead to additional development coming forward

Policy	Policy intention	Impact on HRA	Can policy be ruled out for any impact on European sites?
H1 Sustainable design and renewable	Encourage sustainable design and use of renewables	This policy does not guide where development can come forward or lead to additional development that would not otherwise come forward without the NP being in place.	Yes
H2 Housing Mix	Encourage new houses to meet local needs	As above	Yes
H3 High quality design	New homes to be designed to respect local character	As above	Yes
H4 Home working	Encourage space in new homes for homeworking	As above.	Yes

8. HRA SCREENING

8.10

Table 3.

Identification of policies which do not either guide where development comes forward or lead to additional development coming forward

Policy	Policy intention	Impact on HRA	Can policy be ruled out for any impact on European sites?
H5 Lifetime Homes and Building for a Healthy Life	Encouraging new homes to meet design standards and quality	This policy does not guide where development can come forward or lead to additional development that would not otherwise come forward without the NP being in place.	Yes
H6 Broadband	Encouraging new broadband connections	As Above	Yes
TM1 Active Travel	Encouraging new active travel routes	No route has been identified but potential routes are many kilometers away from any designated European Sites and are likely to follow the route of existing footpaths.	Yes
TM2 EV charging points	Encouraging new homes to have EV charging points	This policy does not guide where development can come forward or lead to additional development that would not otherwise come forward without the NP being in place.	Yes
TM3 Parking standards	Setting minimum internal dimensions of garages and requiring cycle storage	As above	Yes
TM4 Pedestrian and cycle connections	Requiring new homes to connect to pedestrian and cycle routes	As above	Yes

8. HRA SCREENING

8.10

Table 3.

Identification of policies which do not either guide where development comes forward or lead to additional development coming forward

Policy	Policy intention	Impact on HRA	Can policy be ruled out for any impact on European sites?
C1 CIL funds	Funds to support active travel and biodiversity enhancements	This policy may lead to reduction in carbon through increased use of active travel and may have positive impacts on biodiversity locally	Yes
C2 Community energy schemes	Support for community energy schemes	Policy may lead to reduction in carbon usage locally, and have positive impact on environment.	Yes
C3 Protect community facilities	Protect community facilities	This policy does not guide where development can come forward or lead to additional development that would not otherwise come forward without the NP being in place.	Yes
C4 Public realm improvement	Enhancement of village centre	This policy supports light-touch enhancements to village centre such as improved seating and planting. Will not lead to development that will impact designated sites.	Yes
GS1 Green infrastructure	Protect existing GI, achieve biodiversity net gain in new developments	This policy safeguards existing GI and encourages new GI.	Yes
GS2 Local wildlife sites	Protect local wildlife sites and support enhancement	No impact on HRA, policy seeks to protect and enhance wildlife sites	Yes

8. HRA SCREENING

8.10 Table 3. Identification of policies which do not either guide where development comes forward or lead to additional development coming forward

Policy	Policy intention	Impact on HRA	Can policy be ruled out for any impact on European sites?
GS3 Tree planting	Retain existing mature trees and plant new ones	No impact on HRA. Seeks to maintain existing trees and supports planting of new ones. Not promoting development.	Yes
GS4 Local Green Spaces	Designation of 5 sites as Local Green Spaces	Protection of green spaces from development recognising their value in terms of recreation, wildlife and biodiversity. No impact on HRA	Yes
HT1 Heritage assets	Designation of non-designated heritage assets	No impact of HRA. Policy seeks to ensure NDHA are retained and sensitively enhanced/restored.	Yes
HT2 Stone Walls	Retain stone walls	No Impact on HRA. Policy seeks to retain existing stone walls	Yes
HT3 Key Views	Protect key views from development	No impact on HRA. Seeks to ensure any development retains and protects key views	Yes
BE1 Business Space	Support for small scale business space	No impact on HRA. Does not allocate sites or guide where development may come forward.	Yes

8. HRA SCREENING

8.11

The adopted Core Strategy and the HRA of the Core Strategy

As part of the assessment of the HNP, it is important to consider the Core Strategy and the findings of the HRA work into the Core Strategy. Adopted Core strategy policy HO1 provides dwelling targets for the District. Policy HO2 states that the dwellings target set out in Policy HO1 will be met through:

- Housing completions since April 2004
- Existing commitments with planning permission
- Unimplemented but deliverable and developable sites allocated for residential development in the RUDP
- Safeguarded land identified in the RUDP
- Additional new deliverable and developable sites allocated for housing development within the adopted Core Strategy 2017, Bradford City Centre AAP, Shipley & Canal Road AAP and Neighbourhood Plans)

The neighbourhood plan is required to be in general conformity with the policies set out within the adopted Bradford Core Strategy which set the broad parameters for future development within Bradford . The Core Strategy was been subject to HRA, likewise the draft Local Plan will also be subject to the HRA process. The neighbourhood plan gives support for certain development which is in line with the Bradford Core Strategy

The appropriate assessment took into account the broad spatial strategy of the Core Strategy when identifying impacts. Specifically, it took into account (see page 37 of the AA of the Core Strategy):

At least 42,100 dwellings and 135ha of employment land between 2013 and 2030;

The Regional City of Bradford (with Shipley and Lower Baildon) being the prime focus for a wide range of developments, with the principal towns of Ilkley, Keighley and Bingley being the main local focus for housing, shopping, leisure, education, health and cultural activities and facilities. The Local Growth Centres of Burley in Wharfedale, Menston, Queensbury, Silsden, Steeton with Eastburn and Thornton are identified as making a significant contribution to meeting the district's needs for housing, employment and supporting community facilities, with a range of local service centres providing for smaller scale developments; Growth areas including Bradford City Centre and the Shipley & Canal Road Corridor, an urban extension (at Holme Wood), local green belt deletions and a focus on previously developed land;

A wide variety of infrastructure, ancillary and supporting development to achieve regeneration and build sustainable communities; and

A zoned approach to managing and mitigating the effects of development around the South Pennine Moors Phase 2 SPA and South Pennine Moors SAC.

8. HRA SCREENING

8.11

The appropriate assessment assumes the spatial distribution of development as shown below:

Policy HO3: Distribution of Housing Development				
A. In accordance with the vision and spatial principles set out in this Plan, the forthcoming Allocations, Bradford City Centre and Shipley & Canal Road DPD's will allocate sufficient land to meet the residual housing requirement of at least 42,100 for the District between April 2013 and April 2030. This requirement will be apportioned as follows:				
■	3,500	(8.3% of the District total)	within the Bradford City Centre Area AAP;	
■	3,100	(7.4% of the District total)	within the Shipley & Canal Road Corridor AAP;	
■	35,500	(84.3% of the District total)	within the Allocations DPD.	
B. The Apportionments between the different settlements of the District will be as follows:				
The Regional City of Bradford (27,750) Divided as follows:				
■	Bradford City Centre	3,500	■ Bradford NE	4,400
■	Canal Road	3,100	■ Bradford SW	5,500
■	Shipley	750	■ Bradford NW	4,500
■	Bradford SE	6,000		
The Principal Towns (6,900) Divided as follows:				
■	Ilkley	1,000	■ Bingley	1,400
■	Keighley	4,500		
Local Growth Centres (4,900) Divided as follows:				
■	Burley in Wharfedale	700	■ Menston	600
■	Queensbury	1,000	■ Steeton	
			With Eastburn	700
■	Silsden	1,200	■ Thornton	700
Local Service Centres (2,550) Divided as follows:				
■	Addingham	200	■ East Morton	100
■	Balldon	350	■ Harden	100
■	Haworth	400	■ Cottingley	200
■	Cullingworth	350	■ Oakworth	200
■	Denholme	350	■ Oxenhope	100
■	Wilsden	200		

8. HRA SCREENING

8.11

A further key Core Strategy policy which is of direct relevance to the NP is Policy SC8:

Strategic Core Policy (SC8): Protecting the South Pennine Moors SPA and the South Pennine Moors SAC and their zone of influence.

In this Policy:

- *Zone A is land up to 400m from the South Pennine Moors Special Protection Area (“SPA”) and South Pennine Moors Special Area of Conservation (“SAC”) boundary;*
- *Zone B is land up to 2.5km from the SPA and SAC boundary; and*
- *Zone C is land up to 7km from the SPA and SAC boundary.*

Subject to the derogation tests of Article 6(4) of the Habitats Directive, in all Zones development will not be permitted where it would be likely to lead, directly or indirectly, to an adverse effect (either alone or in combination with other plans or projects), which cannot be effectively mitigated, upon the integrity of the SPA or the SAC.

In conducting the above assessment the following approach will apply:

- *In Zone A no development involving a net increase in dwellings would be permitted unless, as an exception, the development and/or its use would not have an adverse effect upon the integrity of the SPA or SAC.*
- *In Zone B it will be considered, based on such evidence as may be reasonably required, whether land proposed for development affects foraging habitat for qualifying species of the SPA.*
- *In Zone C, in respect of residential developments that result in a net increase of one or more dwellings, it will be considered how recreational pressure on the SPA or SAC, that such development might cause, will be effectively mitigated. The mitigation may be:*

(i) such that the developer elects to offer, either on-site and / or deliverable outside the boundary of the development site, such as the provision of accessible natural greenspace and/or other appropriate measures; or

(ii) in the form of a financial contribution from the developer to:

- 1. The provision of additional natural greenspace and appropriate facilities to deflect pressure from moorland habitats and the long-term maintenance and management of that greenspace.*
- 2. The implementation of access management measures, which may include further provision of wardens, in order to reduce the impact of visitors.*
- 3. A programme of habitat management and manipulation and subsequent monitoring and review of measures.*

8. HRA SCREENING

8.11

To mitigate impacts on the SPA and SAC due to the increase in population, an SPD will set out a mechanism for the calculation of the financial contributions, by reference to development types, the level of predicted recreational impact on the SPA or SAC, and the measures upon which such contributions will be spent.

Policy EN2: Biodiversity and Geodiversity of the Core Strategy would also be applicable to all development proposals coming forward in the plan area. This includes the requirement:

The North and South Pennine Moors SPAs and SACs

A. Any development that would be likely to have a significant effect on a European Site either alone or in combination with other plans or projects will be subject to assessment under the Habitat Regulations at project application stage. If it cannot be ascertained that there will be no adverse effects on site integrity then the project will have to be refused unless the derogation tests of Article 6(4) Habitats Directive can be met.

8. HRA SCREENING

8.11 ASSESSMENT OF THE LIKELY EFFECTS OF THE NEIGHBOURHOOD PLAN

Does the HNP propose new development or allocate sites for development?

No. The neighbourhood plan is required to be in general conformity with the policies set out within the adopted Bradford Local Plan which set the broad parameters for future development within Bradford. The Local Plan and Site Allocations Plan have been subject to HRAs. The plan gives support for certain development which is in line with the Bradford Local Plan.

c) Are there any other projects or plans that together with the HNP could impact on the integrity of a European site, the 'in combination' impact?

There is one relevant plan level appropriate assessment that has been carried out. This is the Habitats Regulations Assessment for the Bradford District Core Strategy published in November 2015. This concluded that, taking into account the range of avoidance and mitigation measures incorporated into the strategic plan, the Core Strategy will not result in adverse effects on the ecological integrity of the North Pennine Moors SAC and SPA, South Pennine Moors SAC and South Pennine Moors Phase 2 SPA.

Of key relevance here is that the neighbourhood plan is being brought forward within the wider strategic context provided by the adopted Core Strategy which has already been subjected to appropriate assessment. The neighbourhood plan provides additional detail with regards the shaping development coming forward within the plan area but it does not trigger development in addition to that already envisaged.

In combination effects from other projects and plans in the area can therefore be ruled out.

9. HRA SCREENING CONCLUSION

9.1 It is considered that none of the policies in the HNP are likely to have a significant effect on European Sites, whether alone or in combination with other projects and programmes. The Plan does not specifically allocate land for development and does not promote more land for development than the Local Plan. Furthermore, the policies within the plan are required to be in general conformity with those of the Local Plan (inc Biodiversity policies) which has been subject to HRA assessment.

Screening opinions have been received from the 3 statutory consultees and have been included in section 9 of this report.

10. RESPONSES FROM STATUTORY CONSULTEES

10.1 HISTORIC ENGLAND



Historic England

YORKSHIRE

Mr. Jamie Wilde,
Integreat Plus,
Unit 25,
53 Mowbray Street,
Kelham Island,
Sheffield,
S3 8EN

Our ref: PL00736742
Your ref:

Telephone 01904 601 879
Mobile 0755 719 0988

15 February 2021

Dear Mr. Wilde,

Harden Neighbourhood Plan Strategic Environmental Assessment Screen Opinion

We write in response to your e-mail of Thursday 21st January 2021, seeking a response to your Strategic Environmental Assessment Screening Opinion for the Harden Neighbourhood Plan.

For the purposes of this consultation, Historic England will confine its advice to the question, "Is it likely to have a significant effect on the environment?" in respect to our area of concern, cultural heritage. Our comments are based on the information supplied with the Draft Harden Neighbourhood Plan, June 2020.

The Neighbourhood Plan area includes 1 Grade II* Listed Building, Harden Hall, 34 Grade II Listed Buildings, 3 Scheduled Monuments, the St Ives Estate Registered Parkland and the Rycroft Conservation Areas. There are also likely to be other features of local historic, architectural or archaeological value, and consideration should also be given to the wider historic landscape.

On the basis of the information supplied, and in the context of the criteria set out in Schedule 1 of the Environmental Assessment Regulations [Annex II of 'SEA' Directive], Historic England concurs with the conclusion "*that it is unlikely that any significant environmental effects will arise as a result of the Harden Neighbourhood Plan. Consequently, the assessment within Table 1 concludes (subject to HRA screening outcome), that an SEA is not required when judged against the application of the SEA Directive criteria ...*" and that therefore the preparation of a Strategic Environmental Assessment is not required.



Historic England, 37 Tanner Row, York YO1 6WP
Telephone 01904 60 1948 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.



10. RESPONSES FROM STATUTORY CONSULTEES

10.1 HISTORIC ENGLAND

The views of the other three statutory consultation bodies should be taken into account before the overall decision on the need for an SEA is made.

We should like to stress that this opinion is based on the information available in the Harden Neighbourhood Plan. To avoid any doubt, this does not reflect our obligation to provide further advice on later stages of the SEA process and, potentially, object to specific proposals which may subsequently arise (either as a result of this consultation or in later versions of the plan/guidance) where we consider that, despite the SEA, these would have an adverse effect upon the environment.

We would be pleased if you can send a copy of the determination as required by REG 11 of the Environmental Assessment of Plans and Programmes Regulations 2004.

Historic England strongly advises that the conservation and archaeological staff of the Leeds City Council and the West Yorkshire Archaeological Advisory Service are closely involved throughout the preparation of the plan and its assessment. They are best placed to advise on; local historic environment issues and priorities, including access to data held in the HER (formerly SMR); how the policy or proposal can be tailored to minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of historic assets.

Yours sincerely



Craig Broadwith
Historic Places Adviser
E-mail: Craig.Broadwith@HistoricEngland.org.uk



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Telephone 01904 60 1948 HistoricEngland.org.uk

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10. RESPONSES FROM STATUTORY CONSULTEES

10.2 NATURAL ENGLAND

Date: 16 February 2021
Our ref: 340904/12409



Integreat Plus

FAO Jamie Wilde

BY EMAIL ONLY

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Mr Wilde

Harden Neighbourhood Plan SEA & HRA Screening

Thank you for your consultation on the above dated and received by Natural England on 21 January 2021.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Screening Request: Harden Neighbourhood Plan SEA & HRA Screening

It is our advice, on the basis of the material supplied with the consultation, that, in so far as our strategic environmental interests (including but not limited to statutory designated sites, landscapes and protected species, geology and soils) are concerned, that there are unlikely to be significant environmental effects from the proposed plan.

Neighbourhood Plan

Guidance on the assessment of Neighbourhood Plans, in light of the Environmental Assessment of Plans and Programmes Regulations 2004 (as amended), is contained within the [National Planning Practice Guidance](#). The guidance highlights three triggers that may require the production of an SEA, for instance where:

- a neighbourhood plan allocates sites for development
- the neighbourhood area contains sensitive natural or heritage assets that may be affected by the proposals in the plan
- the neighbourhood plan may have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan.

We have checked our records and based on the information provided, we can confirm that in our view the proposals contained within the plan will not have significant effects on sensitive sites that Natural England has a statutory duty to protect.

We are not aware of significant populations of protected species which are likely to be affected by the policies / proposals within the plan. It remains the case, however, that the responsible authority should provide information supporting this screening decision, sufficient to assess whether protected species are likely to be affected.

10. RESPONSES FROM STATUTORY CONSULTEES

10.2 NATURAL ENGLAND

Notwithstanding this advice, Natural England does not routinely maintain locally specific data on all potential environmental assets. As a result the responsible authority should raise environmental issues that we have not identified on local or national biodiversity action plan species and/or habitats, local wildlife sites or local landscape character, with its own ecological and/or landscape advisers, local record centre, recording society or wildlife body on the local landscape and biodiversity receptors that may be affected by this plan, before determining whether an SA/SEA is necessary.

Please note that Natural England reserves the right to provide further comments on the environmental assessment of the plan beyond this SEA/SA screening stage, should the responsible authority seek our views on the scoping or environmental report stages. This includes any third party appeal against any screening decision you may make.

For any queries relating to the specific advice in this letter and for any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely
Dawn Kinrade
Consultations Team

10. RESPONSES FROM STATUTORY CONSULTEES

10.3 ENVIRONMENT AGENCY

Thank you for consulting the Environment Agency regarding the above mentioned proposed draft plan. We have reviewed the information submitted and we wish to make the following comments. Apologies for the late response.

Strategic Environmental Assessment

We note that the Council has a responsibility to advise the Parish Council if there is a need for formal Strategic Environmental Assessment of the draft Neighbourhood Plan. You are seeking our views in order to inform the Council's decision on this matter.

We have considered the draft plan and its policies against those environmental characteristics of the area that fall within our remit and area of interest.

Having considered the nature of the policies in the Plan, we consider that it is unlikely that significant negative impacts on environmental characteristics that fall within our remit and interest will result through the implementation of the plan.

Draft Plan

We have no objections to the draft plan.

Following are other environmental issues you could look at putting into your plan.

Flood Risk

I note that the area has a risk of flooding (within Flood Zone 2.3) around the watercourses

We would like to see flood risk policies and that minimising the impact of flooding referred to in an 'Environmental' section. This is a key sustainability issue and will be exacerbated in the future due to climate change.

In terms of both policy and site selection, flood risk should be a major consideration in your plan. In drafting your flood risk policy, you should:

- Emphasise that inappropriate development will not be considered acceptable in areas of high flood risk.
- Highlight, where necessary, the need to undertake the sequential and exception tests.
- Promote a sequential approach to development layout, to ensure the highest vulnerability development is located in areas at lowest flood risk.
- Address the potential impacts of climate change on flood risk.
- Describe what is expected of developers in terms of surface water run-off rates (for both brownfield and Greenfield sites) and sustainable drainage systems.

10. RESPONSES FROM STATUTORY CONSULTEES

10.3 ENVIRONMENT AGENCY

- Where possible, expect development to result in a betterment to the existing flood risk situation.
- Ensure that new development does not increase flood risk to others

A sequential approach to flood risk will also need to be taken when allocating sites.

New development proposals should be encouraged to contribute either financially or through physical works to reduce the flood risk to the wider village. This would require a clear understanding of what the flood risk reduction strategy is. This should be reflected in this section/policy.

Surface Water

The Lead Local Flood Authority is now the responsible authority for commenting on the surface water drainage arrangements. We therefore recommend you consult your LLFA regarding the proposed management of surface water within the Plan.

Allocation of sites

Should you decide to allocate for developments, particularly those outside the local plan you should discuss with the local planning authority as soon as possible.

Those that are not within the local plan we suggest any developer take the opportunity to have pre development advise from ourselves, so no unwanted surprises arise at planning stage.

Water quality

Proper management is important to protect water quality, both for groundwater and surface water resources.

Drainage misconnections can occur in new developments, redevelopments, extensions or through refurbishment. Developers must ensure that they do not connect any foul drainage (including sinks, showers, washing machine/dishwasher outlets and toilets) to a surface water sewer, as this can send polluted water into watercourses. Similarly, developers should ensure that they do not connect surface water drainage (e.g. roof gutter downpipes) into foul sewers as this can cause overloading of the foul sewer during heavy rainfall.

Polluted surface water flows from areas like car parks or service yards should always have sufficient pollution prevention measures in place to ensure the protection of groundwater and watercourses from specific pollutants like petrol (hydrocarbons) and suspended solids. Developers should follow appropriate pollution prevention guidance when designing formal drainage for large areas of hardstanding.

Ideally, applicants should introduce more 'surface' or 'green' drainage solutions to aid improvements in water quality, such as swales along hardstanding boundaries, or a more advanced reed bed system for larger sites. These solutions are easier to access and maintain than engineered solutions like petrol/oil interceptors, which require regular maintenance to ensure they operate correctly.

We would welcome a policy which requires a net gain in biodiversity through all development,

10. RESPONSES FROM STATUTORY CONSULTEES

10.3 ENVIRONMENT AGENCY

River restoration

We would welcome the inclusion of a specific river policy, addressing the following:

- Minimum of 8 metre (m) buffer zones for all watercourses measured from bank top to provide an effective and valuable river corridor and improve habitat connectivity. A 5m buffer zone for ponds would also help to protect their wildlife value and ensure that the value of the adjacent terrestrial habitat is protected.
- Development proposals to help achieve and deliver WFD objectives. Examples of the types of improvements that we may expect developers to make are: removal of obstructions (e.g. weirs), de-culverting, regrading banks to a more natural profile, improving in-channel habitat, reduce levels of shade (e.g. tree thinning) to allow aquatic vegetation to establish, etc. Proposals which fail to take opportunities to restore and improve rivers should be refused. If this is not possible, then financial or land contributions towards the restoration of rivers should be required.
- River corridors are very sensitive to lighting and rivers and their 8m buffer zones (as a minimum) should remain/be designed to be intrinsically dark i.e. Lux levels of 0-2.

It may be useful to include ownership information details for landowners, applicants or developers who have a watercourse running through or adjacent to their site. Many people believe that the Environment Agency own 'main rivers' which is not the case. Whilst we hold permissive powers to carry out maintenance on main rivers, the site owner is the 'riparian owner' of the stretch of watercourse running through their site (whole channel) or adjacent to their site (up to the centre line of the channel) – and this includes culverted watercourses. Our 'Living on the Edge' publication provides important guidance for riverside owners.

Applicants should remove watercourses from existing culverts where this is feasible. This will help to reduce flood risk from blocked or collapsed culverts, and open channels are significantly easier for the landowner to maintain. Culverts that cause blockages of the watercourse are the responsibility of the owner to repair. Additionally, we will usually object to planning applications that propose new culverts.

Your plan policy should also provide details of 'buffer zones' that are left adjacent to watercourses. We will always ask developers to maintain an undeveloped,

Naturalised, 8 metre buffer zone adjacent to main rivers. We ask that applicants do not include any structures such as fencing or footpaths within the buffer zone as this could increase flood risk - through the inclusion of close-board fencing for example. Any works or structures that applicants intend within 8m of a main river will require a flood defence consent from us, which is separate from and in addition to any planning permission granted.

Sustainable construction

You could also help your community save money through sustainable construction. Neighbourhood planning is an opportunity for communities to encouraging efficient water and waste management systems in new buildings, and use locally sourced wood fuel for heating. You could also help to promote the use of sustainable materials in construction, and encourage energy efficiency measures for new builds. These measures will reduce the cost of construction for developers and help to reduce utility bills for those using

10. RESPONSES FROM STATUTORY CONSULTEES

10.3 ENVIRONMENT AGENCY

the building. This will also help the environment by reducing emissions and improving air quality.

We hope this response helps you develop your plan.

Kind Regards

Claire Dennison
Sustainable Places Planning Advisor

MY CONTACT DETAILS:

Direct Dial : 02030256425 (internal 56425)

Email: Claire.Dennison@environment-agency.gov.uk

TEAM CONTACT DETAILS:

Tel: 020 302 56862 (Internal 56862)

Email: sp-yorkshire@environment-agency.gov.uk