



Standish Neighbourhood Development Plan HRA

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Footprint Ecology is a small, employee-owned, ecological consultancy with an ethical focus. Founded in 2004 and based in Purbeck, Dorset we are catalysts for change, collaborating with organisations that share our commitment to sustainability and social responsibility. We create practical solutions to complex ecological challenges across a diverse portfolio including nature conservation, outdoor recreation and associated strategic planning.

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Summary

The Conservation of Habitats and Species Regulations 2017 (as amended) require local authorities to assess the impact of their plan on the internationally important nature conservation sites in and around their administrative areas. The task is achieved by means of a Habitats Regulations Assessment (HRA). Sites that are relevant to the assessment are 'European sites' and include Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites. These European sites are the top tier of protected sites in the UK.

This document is the HRA of the Standish Neighbourhood Plan ('the Plan'). Neighbourhood plans give communities direct power to develop a shared vision for their neighbourhood and shape the development and growth of their local area. Relevant European sites to the Standish Neighbourhood are the Cotswold Beechwoods SAC, Rodborough Common SAC and the Severn Estuary SAC/SPA/Ramsar site.

An HRA asks very specific questions of a plan. Firstly, it 'screens' the plan to identify if there is a risk that certain policies or allocations may have a 'likely significant effect' on a European site, alone or (if necessary) in-combination with other plans and projects. If the risk of likely significant effects can be ruled out, then the plan may be adopted but if they cannot, the plan must be subjected to the greater scrutiny of an 'appropriate assessment'. Following an appropriate assessment, a Plan may be adopted if an adverse effect on the integrity of the site can be ruled out, alone or in-combination with other plans or projects.

The Standish Neighbourhood Plan does not allocate particular sites for development or set any kind of quantum of growth. However, Policies 6A and 6B, relating to Stagholt Farm and a protected area of search do create the potential for development at this location and were therefore screened in on a precautionary basis for likely significant effects for all relevant European sites and a number of impact pathways. We recommend that protective wording is added to the Plan to highlight the need for project level HRA and rule out adverse effects on integrity for all European sites, were Stagholt Farm to come forward for development.

With such protective wording added, the Plan can be concluded to be compliant with the Habitats Regulations 2017, as amended. The additional wording would eliminate any doubt and enable a conclusion of no adverse effect on integrity, for all European sites, alone or in-combination.

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Acknowledgements

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1. Introduction

- 1.1 This document is a Habitat Regulations Assessment (HRA) report to accompany the draft Standish Neighbourhood Development Plan ('the Plan'). The report has been prepared by Footprint Ecology on behalf of Standish Parish Council. An HRA assesses the implications of a plan for the top tier of nature conservation sites, 'European sites', in the area.

The Standish Neighbourhood Development Plan

- 1.2 Neighbourhood plans give communities direct power to develop a shared vision for their neighbourhood and shape the development and growth of their local area.
- 1.3 The Standish Neighbourhood Development Plan has been prepared by Standish Neighbourhood Plan Steering Group. A previous version (in 2022) did not progress beyond examination. The current plan has been extensively rewritten and revised but draws on the earlier work, findings at Examination and guidance from Stroud District Council. The Plan covers the period from 2026 – 2040 and contains six policies and supporting text.
- 1.4 This HRA report accompanies the pre-submission, draft plan ('Regulation 14') and is based on a version of the Plan shared with Footprint Ecology in February 2026. The draft plan will be subject to consultation, following which it may be changed prior to being submitted to Stroud Council who will organise the examination and referendum. The HRA will be finalised at the point at which the plan is finalised and ready for adoption.
- 1.5 Neighbourhood plans form part of the development plan for a planning authority and must be in general conformity with the strategic policies of the development plan in force at the time. For Standish, the relevant planning authority is Stroud District Council and the relevant plan is Stroud District Local Plan¹, adopted in November 2015.
- 1.6 Stroud District Council have submitted an updated Local Plan in 2021, the Stroud District Local Plan Review. Local Plan Review seeks to allocate a site for 700 homes and 5 hectares of employment land on the site identified as

¹ https://www.stroud.gov.uk/media/2iqhaixj/stroud-district-local-plan_november-2015_low-res_for-web.pdf

PS19a, which lies entirely within Standish Parish and is part of the 'Stonehouse Cluster' within the Plan.

- 1.7 As of March 2026, the Inspectors have written to SDC, National Highways, Gloucestershire County Council and South Gloucestershire Council requesting further clarification on the previously raised highways matters. This consultation closes on 4 May 2026 and is open only to those organisations named above. The Examination remains paused, and at present there is no clear indication from the Inspectors regarding the next steps.
- 1.8 Separately, the Government's new plan-making framework places a legal requirement on SDC to commence a new Local Plan during 2026. This requirement is not optional and applies even though the submitted Local Plan remains under examination. The Government's intention is to ensure nationwide coverage of up-to-date Local Plans and to transition all authorities into the new streamlined process.

Habitats Regulations Assessment Process

- 1.9 The designation, protection and restoration of European wildlife sites is embedded in the Conservation of Habitats and Species Regulations 2017, as amended, which are commonly referred to as the 'Habitats Regulations'. These are domestic law and remain in place post-Brexit. The most recent amendments (the Conservation of Habitats and Species (amendment) (EU Exit) Regulations 2019²) take account of the UK's departure from the EU.
- 1.10 Regulation 105 *et seq* addresses the assessment of local plans and determines the scope of this HRA alongside recent Government Guidance on the interpretation and application of the Regulations³.

European sites

- 1.11 'European sites' are those over which the provisions of the Habitat Regulations exert an influence, through statute or policy. They are the top tier of protected sites in the UK and are of international importance for

² The amending regulations generally seek to retain the requirements of the 2017 Regulations but with adjustments for the UK's exit from the European Union. See Regulation 4, which also confirms that the interpretation of these Regulations as they had effect, or any guidance as it applied, before exit day, shall continue to do so.

³ Habitats regulations assessments: protecting a European site. Defra and Natural England. 24 February 2021. <https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site>

nature conservation. Prior to Brexit, these were part of the Natura 2000 network of sites which formed the largest global network of protected sites.

1.12 Sites that are afforded statutory protection and included within Regulation 8 of the Habitats Regulations are now part of the 'national network' and referred to as Habitats sites. Statutory sites comprise:

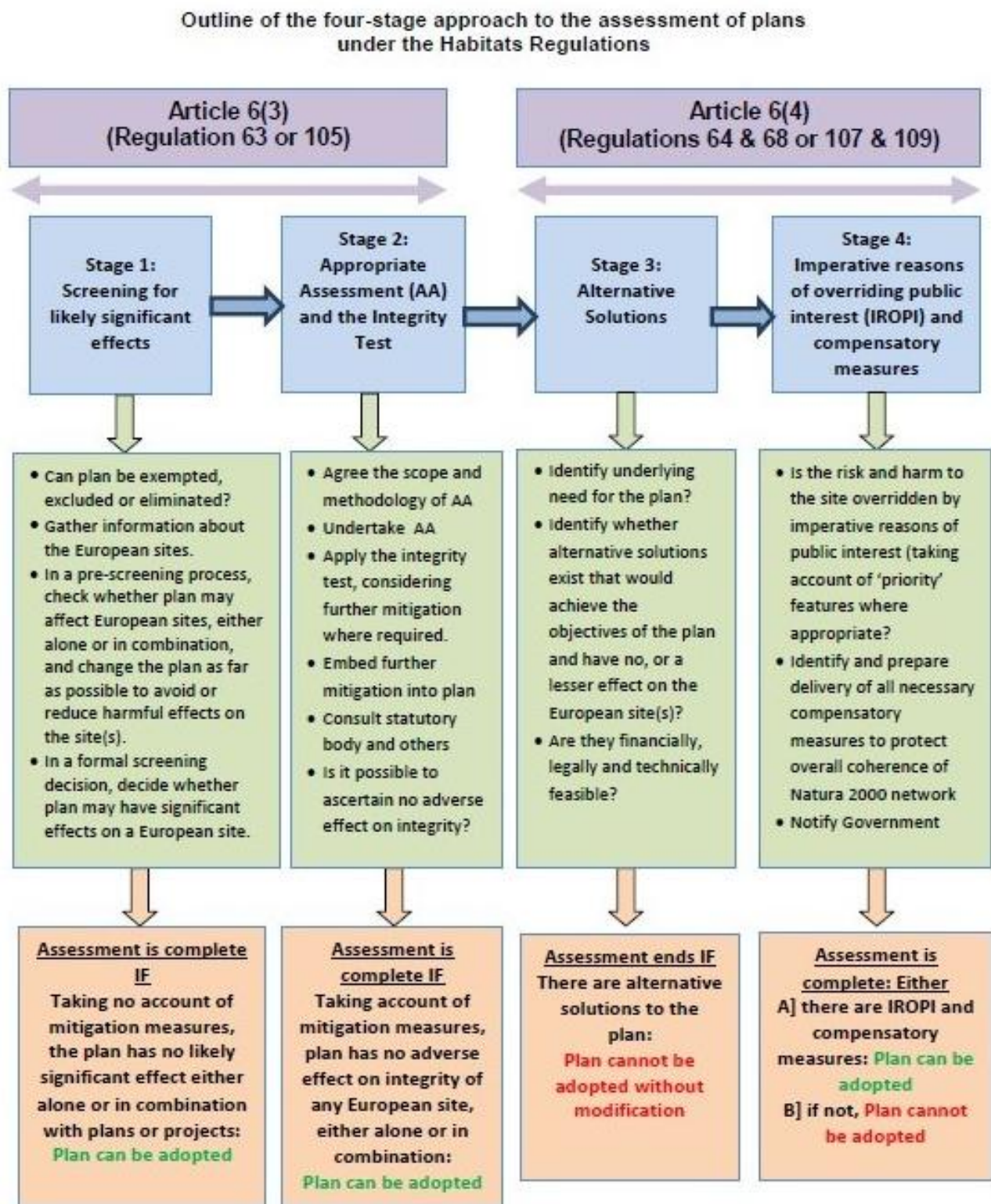
- Special Areas of Conservation (SACs) designated under the 1992 Habitats Directive;
- Sites of Community Importance (SCI) included on the list of such sites compiled by the European Commission and submitted before the UK left the EU;
- Candidate SACs (cSACs), submitted by the UK government to the European Commission before Exit day as eligible for selection as an SCI;
- Special Protection Areas (SPAs) classified under the 1979 Birds Directive;
- Potential SPAs (pSPAs) include potential sites as designated by the European Commission under the Conservation of Wild Birds Directive (2009).
- Areas providing formal compensation for damage to a European site.
- Ramsar sites (wetlands of international importance); the Planning and Infrastructure Act 2025 modified the Regulations to provide statutory protection for Ramsar in England.

1.13 The overarching objectives of the national network are to maintain, or where appropriate, restore habitats and species listed in Annexes I and II of the Habitats Directive to a Favourable Conservation Status. They also contribute to ensuring, in their area of distribution, the survival and reproduction of wild birds and securing compliance with the overarching aims of the Wild Birds Directive.

1.14 The appropriate authorities must have regard to the importance of protected sites, coherence of the national site network and threats of degradation or destruction (including deterioration and disturbance of protected features) on SPAs and SACs.

Process

1.15 Plans and projects which are directly connected with or necessary to the management of a European site may be exempt from the HRA process. For all other plans and projects, assessment proceeds through a step-by-step process. The step-by-step process of an HRA is summarised in Figure 1.



Extract from *The Habitats Regulations Assessment Handbook*, www.dtapublications.co.uk
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Figure 1: Outline of the assessment of plans under the Habitat Regulations, taken from the Habitat Regulations Handbook (now withdrawn by DTA Publications). Though dated prior to the latest amendments to the Regulations, the same tests still apply and remain valid.

- 1.16 Throughout all stages, there is a continual consideration of the options available to avoid and mitigate any identified potential impacts. A competent authority may consider that there is a need to undertake further levels of evidence gathering and evaluation at the appropriate assessment stage in order to provide the necessary certainty. At this point the competent authority may identify the need to add to or modify a plan in order to adequately protect the European site, and these mitigation measures may be added through the imposition of particular restrictions and conditions.
- 1.17 For plans, the stages of HRA are often quite fluid, with the plan normally being prepared by the competent authority itself. This gives the competent authority the opportunity to repeatedly explore options to prevent impacts, refine the plan and rescreen it to demonstrate that all potential risks to European sites have been successfully dealt with.
- 1.18 When preparing a plan, a competent authority may therefore go through a continued assessment as the plan develops, enabling the assessment to inform the development of the plan. For example, a competent authority may choose to pursue an amended or different option where impacts can be avoided, rather than continue to assess an option that has the potential to significantly affect European site interest features.
- 1.19 After completing an assessment, a competent authority should only adopt a plan where it can be ascertained that there will not be an adverse effect on the integrity of the European site(s) in question. In order to reach this conclusion, the competent authority may have made changes to the plan, or modified the project with restrictions or conditions, in light of their Appropriate Assessment findings.
- 1.20 Where adverse effects cannot be ruled out, further exceptional tests are set out in Regulation 107. In exceptional cases, this allows a plan to be taken forward where there are no 'alternative solutions', where 'imperative reasons of overriding public interest' apply and where compensation can be delivered. It should be noted that meeting these tests is a rare last resort and ordinarily, competent authorities seek to ensure that a plan or project is fully mitigated for, or it does not proceed.

Definitions, references to case law and guidance

- 1.21 This HRA follows the principles of case law, both UK and EU. Drawing on case law and other relevant guidance, we clarify the following terms used in the flow chart (Figure 1).

- 1.22 In Stage 1, a **'likely significant effect'** following Waddenzee⁴, is a *'possible significant effect; one whose occurrence cannot be excluded on the basis of objective information'*. It is a low threshold and simply means that there is a risk or doubt regarding such an effect. The screening stage is a preliminary examination, sometimes described as a coarse filter, or following Sweetman⁵, as *'a trigger for the obligation to carry out an appropriate assessment'*. There should however be credible evidence to show that there is a real rather than a hypothetical risk of effects that could undermine a site's conservation objectives. This was amplified in the Bagmoor Wind⁶ case where *'if the absence of risk... can only be demonstrated after a detailed investigation, or expert opinion, [then] the authority must move from preliminary examination to appropriate assessment'*.
- 1.23 Following the People Over Wind judgement⁷, when making screening decisions for the purposes of deciding whether an appropriate assessment is required, competent authorities cannot take into account any measures intended to avoid or reduce harmful effects upon a European site.
- 1.24 Stage 2 involves the **appropriate assessment and integrity test**. Here a plan can only be adopted if the competent authority can demonstrate that it will not adversely affect the integrity of the European site. This is precautionary approach and means it is necessary to show the absence of harm.
- 1.25 Following Champion⁸ **'appropriate'** is not a technical term but simply indicates that the assessment needs to be appropriate to the task in hand.
- 1.26 The **integrity** of a European site has been described as the 'coherence of its ecological structure and function, across its whole area, that enables it to sustain the habitat, complex of habitats and/or the levels of populations of the species for which it was classified⁹. An alternative definition, after Sweetman¹⁰, is 'the lasting preservation of the constitutive characteristics of the site'.

⁴ Waddenzee: European Courts C-127/02 Waddenzee 7th September 2004, reference for a preliminary ruling from the Raad van State.

⁵ Sweetman: European Court C – 258/11 Sweetman 11th April 2013, reference for a preliminary ruling from the Supreme Court of Ireland.

⁶ Bagmoor Wind: UK courts Bagmoor Wind v The Scottish Ministers, Court of Session [2012] CSIH 93.

⁷ People Over Wind and Sweetman v Coillte Teoranta (323-17) [2018] PTSR 1668.

⁸ R (on the application of Champion v North Norfolk District Council) [2015] 1 WLR 3170 at para 41.

⁹ Para 20 of the ODPM Circ. 06/2005.

¹⁰ Sweetman v An Bord Pleanála (C–258-11) [2014] PTSR 1092 at paragraph 39.

- 1.27 In terms of the burden of proof, the HRA of development plans was first made a requirement in the UK following a ruling by the European Court of Justice in *EC v UK*¹¹. However, the judgement¹² recognised that any assessment had to reflect the actual stage in the strategic planning process and the level of evidence that might or might not be available. This was given expression in the High Court (*Feeney*)¹³ which stated: “*Each ... assessment ... cannot do more than the level of detail of the strategy at that stage permits*”.
- 1.28 The need to consider possible **in-combination** effects arises at stage 1 – the screening and also at stage 2 – the appropriate assessment and integrity test. The effects of the plan in-combination with other plans or projects are the cumulative effects which will or might arise from the addition of the effects of other relevant plans or projects alongside the plan under consideration. If during the stage 1 screening it is found the subject plan would have no likely effect alone but might have such an effect in-combination, then the appropriate assessment at stage 2 will proceed to consider cumulative effects. Where a plan is screened as having a likely significant effect alone, the appropriate assessment should initially concentrate on its effects alone.

Role of the competent authority

- 1.29 This HRA has been prepared to help Stroud District Council discharge its duties under the Habitats Regulations on behalf of Standish Parish Council. It is therefore Stroud District Council that is the competent authority and must decide whether to accept this report or otherwise. Further, it should be noted that this HRA has been prepared for the purposes of preparing and examining the Plan. The Plan itself does not contain any allocations; any future individual planning applications within the Neighbourhood Plan area will need to be subject to further assessment under the Habitat Regulations and any approval be dependent on the outcome of that assessment.

Planning reform

- 1.30 The UK government has set ambitious targets for house building over the current parliament. The Planning and Infrastructure Act¹⁴, enacted in

¹¹ *Commission v UK* (C-6/04) [2005] ECR I-9017.

¹² *Commission of the European Communities v UK* Opinion of Advocate General Kokott.

¹³ *Feeney v Oxford City Council* [2011] EWHC 2699 Admin at paragraph 92.

¹⁴ The Planning and Infrastructure Act received Royal Assent on 18th December 2025, see <https://bills.parliament.uk/bills/3946> for background and details.

December 2025, is proposed to speed up and streamline the delivery of new homes, with a focus on strategic mitigation to enable development. The Act establishes Natural England (as the delivery body) responsible for the production and administration of Environmental Delivery Plans (EDPs), determining standardised levels of environmental mitigation needed for certain types and scales of development in a specific area. At the time of writing, EDPs will initially focus on nutrient related issues such as water and air quality but there is scope in the future for these to cover a wider range of issues such as recreation, individual species and other sensitive features.

- 1.31 Until EDPs are adopted in a given area it is important that Stroud District Council (as the competent authority) ensures necessary assessment work is undertaken and that, where required, strategic mitigation schemes are in place to address the impacts of development across the District. The Plan will need to be assessed in light of the legislation and legal requirements in place at the time, and as such it is necessary to ensure all impacts are identified in the early stages of the Plan and necessary mitigation identified and secured.

Other relevant HRAs

- 1.32 It is usually the case with neighbourhood plans that the HRA can defer to the strategic HRA work completed to accompany the local plan. In this case, the adopted local plan is dated and cannot be relied upon to inform this HRA. More recent strategic HRA work in relation to the 2021 Local Plan Review provides useful strategic context but given the status of the Local Plan Review can also not be relied on. Therefore, it will be important to ensure that policies and supporting text in this plan conform with nature conservation policies that have been put in place since the current local plan was adopted. This report takes the approach that this HRA work is complete, stands alone and does not simply defer to conclusions of the adopted local plan and accompanying HRA.

2. Relevant European sites

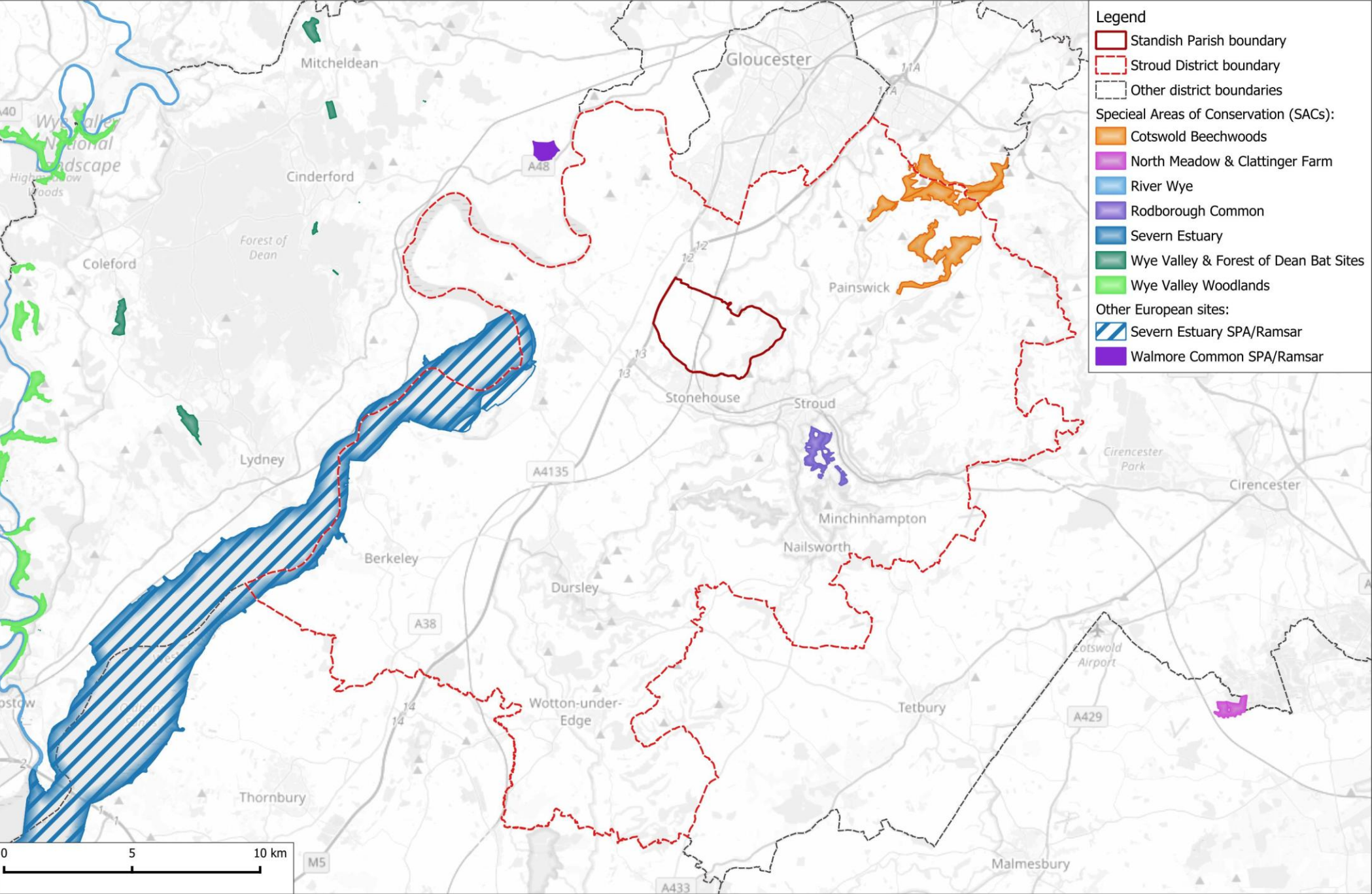
- 2.1 We use a precautionary approach to identify the relevant European sites and follow the approach used in the HRA of the Local Plan Review. This used an initial area of search of 20km from the District Boundary. Air quality impacts at a plan level are typically considered from a 10km distance (Chapman & Kite, 2021), while generic analysis of Footprint Ecology visitor data to countryside sites across the UK suggests that the majority of visitors originate within a 12.6km radius. The choice of 20km is therefore precautionary.
- 2.2 All sites that fall within 20km of the Stroud District boundary are listed in Table 1, with the table also giving the shortest distance from the European site to boundary of the Neighbourhood Plan. It can be seen that there are a total of 11 European sites identified in the table, however a number of these can be discounted from any further consideration (grey shading in the table) on the basis that they were discounted from further consideration in the Local Plan Review HRA and as such there is no possible way they might be impacted by the Standish Neighbourhood Plan. These are all located well away from the Standish Neighbourhood Plan area and have no plausible links in terms of water catchments, traffic or recreation use.
- 2.3 Based on Table 1 there are therefore five relevant European sites that can be the focus for the screening of the Standish Neighbourhood Plan. These are the Cotswold Beechwoods SAC, Rodborough Common SAC and the Severn Estuary SAC, SPA and Ramsar. The Severn Estuary sites have a contiguous boundary and therefore, throughout this HRA we typically refer to the Severn Estuary SAC/SPA/Ramsar unless there is a need to refer to a specific designation or feature. Further details on the five European sites are provided in Appendix 1, which gives the qualifying features, description of the site and provides links to the conservation objectives for each site.

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Table 1: European Sites within a 20km radius of Stroud District and checked as part of the HRA of the Local Plan Review. Grey shading indicates sites that can be eliminated from further consideration in this HRA as there were no possible risks or impact pathways identified in the Stroud Local Plan Review HRA.

European site	Screened in the Local Plan Review HRA	Distance from Standish NP area (km)
Cotswolds Beechwoods SAC	✓	4.5
North Meadow and Clattinger Farm SAC		22.1
River Wye SAC		20.3
Rodborough Common SAC	✓	3.3
Severn Estuary SAC	✓	4.6
Severn Estuary SPA	✓	4.7
Severn Estuary Ramsar	✓	4.7
Walmore Common SPA		6.7
Walmore Common Ramsar		6.7
Wye Valley and Forest of Dean Bat sites SAC		11.9
Wye Valley Woodlands SAC		22.2

Map 1: European sites near Standish Parish



Potential impact pathways

2.4 The following broad impact pathways can be used to assess the ways in which a plan could conceivably have an impact on relevant European sites and trigger likely significant effects:

- **Habitat loss and land-take**, i.e. the direct loss of land within European sites, e.g. from development;
- **General urban effects**, covering impacts associated with development in very close proximity to European sites, through for example light pollution, noise, domestic cats, spread of garden waste and invasive species etc. This pathway would only be relevant where European sites are within the Standish boundary. Also only relates to sites with existing boundaries with extensive urban fringe or qualifying features potentially vulnerable to cat predation (e.g. heathland birds, herptiles);
- **Mobile species and impacts to functionally-linked land**, i.e. impacts to supporting habitat (loss of land or change of use) or risks for species moving outside European site boundaries (e.g. where lighting or development hinders movement or use of areas).
- **Recreation**, covering impacts relating to public access to sensitive areas, including disturbance, increased fire risk and contamination from dogs. Relevant where sites are accessible to the public and the accessible areas include habitats vulnerable to recreation/fire, such as heathland, chalk grassland, reedbeds, vegetated shingle, sand dunes or particular species (ground-nesting birds, colonial waterbirds, Dartford Warbler, wintering waterbirds etc.);
- **Water quality**, covering the impacts from increased nutrients and pollution and relevant for European sites with water-dependent qualifying features and a catchment within Standish;
- **Water quantity**, covering impacts relating to abstraction of water and a reduction in the amount of water available, relevant for European sites with water-dependent qualifying features;
- **Air quality**, covering the impacts of air pollution including those associated with increased traffic. Relevant to European sites with roads within 200m and qualifying features potentially vulnerable to changes in air quality.

2.5 These are simplified, umbrella terms to facilitate screening and simplify a range of complex issues. The European sites have different qualifying features and as such the impacts will vary depending on the site. The local geography and distance from Standish Neighbourhood Development Plan area to the European site boundary will also determine which sites are vulnerable and which impact pathways might be relevant.

- 2.6 Table 2 summarises which impact pathways are relevant for each of the relevant European sites. This table provides further context for the screening for likely significant effects and shows which impacts pathways and sites need to be checked when screening the Plan. Land take, habitat loss or urban effects will not be relevant as there are no European sites within or in close proximity to the Standish Neighbourhood Plan area. Other impact pathways are potentially relevant for certain European sites.

Table 2: Relevant European sites and potential impact pathways that could be relevant in the screening. 'Ticks' indicate where the impact pathway might be relevant.

European site	Distance to boundary (km)	Habitat loss and Land-take	General urban effects	Mobile species and functionally-linked land	Recreation	Water quality	Water quantity	Air quality	Notes
Cotswold Beechwoods SAC	4.5				✓			✓	Strategic scheme in place for recreation impacts. Site is bisected by roads. Therefore, any plan content that might affect recreation use or traffic a risk.
Rodborough Common SAC	3.3				✓			✓	Strategic scheme in place for recreation impacts. Site is bisected by roads. Therefore, any plan content that might affect recreation use or traffic a risk.
Severn Estuary SAC	4.6			✓	✓	✓	✓		Strategic scheme in place for recreation impacts. Standish is within the catchment and therefore any change with respect to hydrology a risk. Migratory fish are a mobile feature. No main roads within 200m identified within the Local Plan Review HRA and air quality screened out.
Severn Estuary SPA	4.7			✓	✓	✓	✓		As above. Wintering waterbirds relevant in terms of mobile species.
Severn Estuary Ramsar	4.7			✓	✓	✓	✓		As above.

3. Screening for potential likely significant effects

- 3.1 The screening is stage one of the four-stage process and is the point at which the plan is checked for likely significant effects. With a neighbourhood plan the screening is usually a policy-by-policy check to ensure all elements of the plan are considered in the context of the Habitat Regulations. Any areas of concern will then be examined in more detail at the appropriate assessment stage (stage two) of the Habitat Regulations process. In the previous section we have identified the relevant European sites and the potential impact pathways that be relevant to those sites – this facilitates the screening by setting out the different things that need to be checked.
- 3.2 The screening has been undertaken using the draft policies shared in February 2026. The screening will need to be reviewed and updated with any further versions or changes to the Plan. The complete screening of all policies is provided in Table 3.

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Table 3: Screening for likely significant effects ('LSE'). Shading within the table has been used to help demonstrate the screening outcomes with **pale** shading for the plan structure which is irrelevant to the screening, **green** shading for policies screened out (no LSE) and **blue** shading to show any policies screened in for further assessment (potential for LSE).

Policy	Description	Screening outcome	Relevant European sites	Notes
Introduction	Introductory text stating the relevant documents within the Plan.	Introductory text. No LSE.		
Background and policy	Supporting text to state the legal process of neighbourhood planning, planning policy and policies relevant to Standish within the adopted Stroud Local Plan (2015).	Supporting text. No LSE.		
Standish: History and context	Supporting text setting out the history, surroundings and built environment in Standish.	Supporting text. No LSE.		
Parish consultations prior to the NDP	Chapter details the key concerns and outcomes of the consultation ahead of the neighbourhood plan.	Supporting text. No LSE.		
Standish in 2025: Community profile	Tables and supporting text to describe the community.	Supporting text. No LSE.		
Standish Neighbourhood Development Plan	Chapter outlines the vision and objectives for the Plan.	Introductory text. No LSE.		
The Standish Countryside: Our special natural and historic environment	Chapter describes the countryside surrounding Standish, such as the relevant National Landscape, extensive views and discusses the limited scope for development.	Supporting text. No LSE.		
Policy 1 - Standish Landscape Character Areas	Policy sets criteria for future development with regard to character, landscape and appropriate provision of green	Policy gives general criteria. No LSE.		Environmentally positive policy, particularly with mention of green infrastructure for large developments (potentially will include strategic SANG) where

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Policy	Description	Screening outcome	Relevant European sites	Notes
	infrastructure for any larger or strategic developments.			required. Policy does not set out European sites and mitigation requirements and therefore does not need to be screened in (in accordance with People vs Wind).
Policy 2 - Biodiversity	Policy sets environmental considerations such as retaining dark skies, mature trees and using BNG to support habitats and species within the area.	Policy gives general criteria. No LSE.		Environmentally positive policy aimed to protect local greenspaces and biodiversity. Policy does not mention European sites and does not relate to mitigation; therefore, it does not need to be screened in (in accordance with People vs Wind).
Policy 3 – Locally Significant Heritage Assets	Policy sets out the local heritage considerations for any future development, including those which are undesignated.	Policy gives general criteria. No LSE.		
Policy 4 – Sustainable Travel in Standish	Policy describes the requirement for any future development to make links with the multi-user path.	Policy gives general aspiration. No LSE.		
Policy 5 – Community Facilities	Policy safeguards community facilities, which include several greenspaces. Any future development should not lead to the loss or negative adverse effects to these facilities.	Policy gives general criteria. No LSE.		An environmentally positive policy which safeguards (or seeks to enhance) existing community greenspaces if there is new development.
Policy 6A – Protected Area of Seach Stagholt Farm	Policy safeguards the land at Stagholt Farm and sets the conditions for which development at this site would be acceptable.	Policy may have an impact on a European site in combination with other plans or projects. LSE	Cotswold Beechwoods SAC (recreation, air quality); Rodborough Common SAC (air quality); Severn Estuary SAC/SPA/Ramsar (water	Policy simply safeguards the land and sets conditions by which development would be acceptable. In this respect it provides the scope for the site to be developed in the

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Policy	Description	Screening outcome	Relevant European sites	Notes
			quality, water quantity, recreation, mobile species/FLL).	future, and as such is screened in on a precautionary basis.
Policy 6B – Site Allocation PS19A	Policy sets criteria to safeguard existing access to Stagholt Farm and ensure the site does not become landlocked, irrespective of the Stroud Local Plan status.	Policy may have an impact on a European site in combination with other plans or projects. LSE.	Cotswold Beechwoods SAC (recreation, air quality); Rodborough Common SAC (air quality); Severn Estuary SAC/SPA/Ramsar (water quality, water quantity, recreation, mobile species/FLL).	Policy simply safeguards the land and sets conditions by which development would be acceptable. In this respect it provides the scope for the site to be developed in the future, and as such is screened in on a precautionary basis.

Screening conclusions

- 3.3 Likely significant effects were identified for policies 6A and 6B in relation to the Protected Area of Search (PAS) for Stagholt Farm implications for PS19a. Policies 6A and 6B do not set any quantum of growth and are criteria-based policies that simply mean there could be scope for development to occur within the PAS at some point in the future. As such the policies are screened in on a precautionary basis for a range of impact pathways.

4. Appropriate Assessment of Policy 6A and 6B

4.1 Policies 6A and 6B ensure that development could occur at Stagholt Farm at some point in the future. The policies do not provide any detail to assess at this stage, and it is even feasible that development will not come forward on the site at all. Nonetheless, the policies do mean development could be more likely and feasible at Stagholt Farm, and as such the implications need to be considered in more detail.

4.2 The likely significant effects would relate to the following impact pathways and European sites:

- Mobile species & functionally-linked land: Severn Estuary SAC/SPA/Ramsar;
- Recreation: Cotswold Beechwoods SAC, Severn Estuary SAC/SPA/Ramsar;
- Hydrological issues (water quality and water quantity): Severn Estuary SAC/SPA/Ramsar;
- Air quality: Cotswold Beechwoods SAC, Rodborough Common SAC.

4.3 All impact pathways relate to indirect effects on European sites that are some distance from the Standish Neighbourhood Plan area. The risks would relate to the general cumulative effects of development across a wide area. The risks are precautionary as, at this stage, there are no details on which an assessment can be based and development at Stagholt Farm is hypothetical. Furthermore, Stagholt Farm would only come forward for development if PS19a is allocated for development in the draft Stroud District Local Plan (currently at Examination in Public) and/or a planning application is approved for PS19a. By that point PS19a will have been subjected to detailed project-level HRA and detailed checks undertaken of European site issues.

4.4 Each pathway is considered in more detail below.

Mobile species and functionally-linked land

4.5 Many European sites support mobile species which can use land outside the European site boundary (Chapman & Tyldesley, 2016), for example waders and wildfowl can use farmland and low-lying land around estuaries as feeding or roost sites. Land around the periphery of European sites may also be important for land management or for future management, for example in relation to realignment and coastal squeeze on estuaries.

- 4.6 These issues are particularly relevant to the Severn Estuary SPA/SAC/Ramsar, where geese, swans and waders will use nearby areas as roost sites (during high tide) and also foraging habitat. In addition, watercourses feeding into the estuary potentially provide supporting habitat and connectivity for migratory fish such as lamprey and European Eel (SAC/Ramsar). The role of supporting habitat for the estuary may well change over time, and the impacts of climate change are relevant. The estuary supports dynamic habitats that will change over time, with change exacerbated by rising sea levels/storminess and the presence of hard sea defences, meaning there is likely to be a loss of habitats within the estuary. Loss of saltmarsh and similar habitats may mean birds increasingly rely on land outside the estuary.
- 4.7 Given the distances and location of Standish and the habitats present at Stagholt Farm risks are potentially very low, however before any risks can be ruled out it will be necessary to understand the details of any development that might come forward and the use of the area by relevant species.

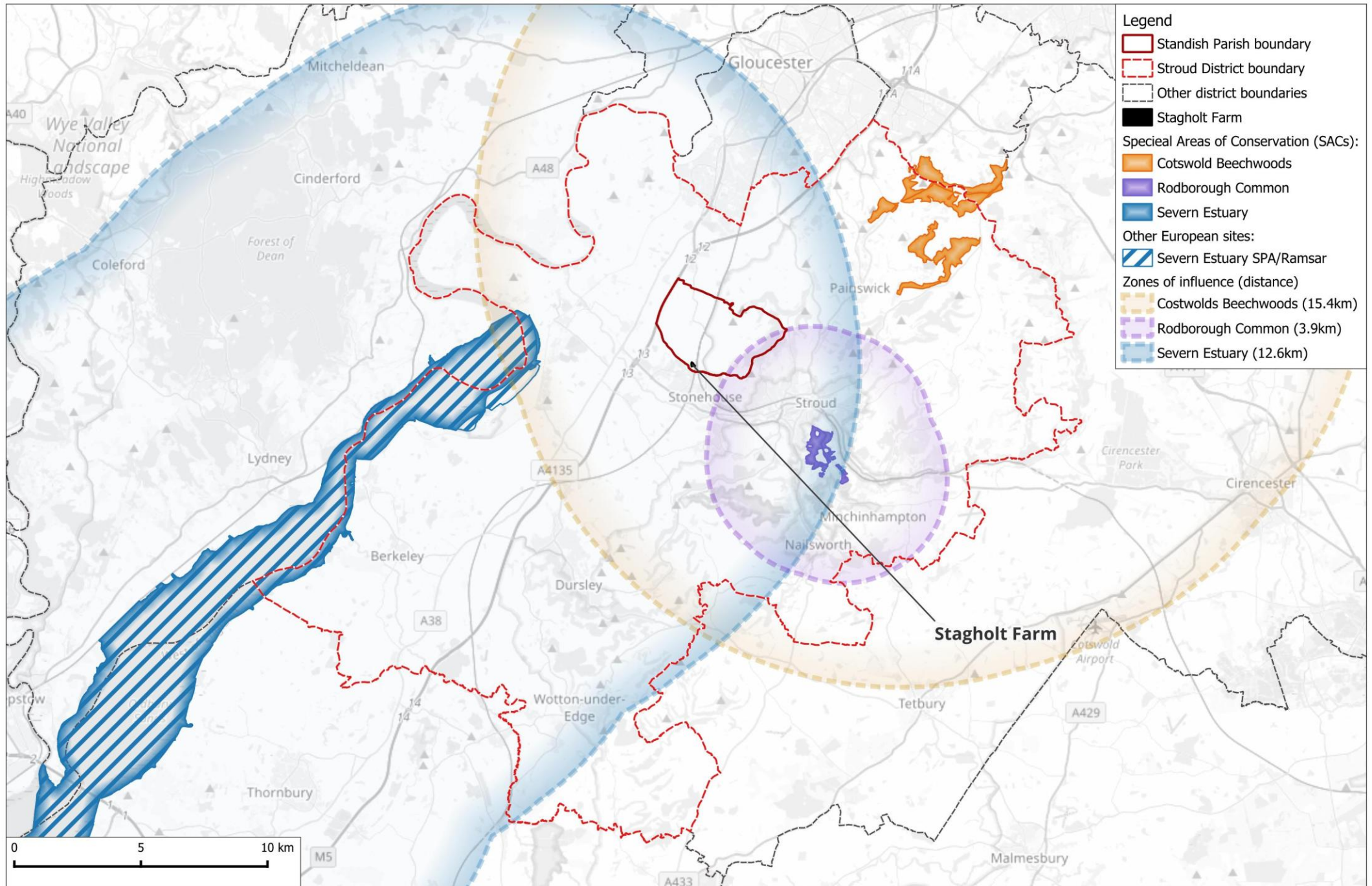
Recreation

- 4.8 New housing growth has the potential to result in more people visiting the countryside and increases the potential for impacts from recreation. The increase in people accessing the countryside is generally positive as it provides wider benefits to society that include benefits to mental/physical health (Bragg & Atkins, 2016; Kondo et al., 2020; Lee & Maheswaran, 2011) and economic benefits (Bateman et al., 2014; Dasgupta, 2021; Day, 2020). Access to greenspaces can also enforce pro-environmental behaviours and instil a greater respect for the world around us (Richardson et al., 2016).
- 4.9 Recreation can nonetheless result in a number of impacts to the nature conservation interest of sites, particularly where there are high levels of use or where sensitive features occur. Impacts from recreation can take a wide range of forms and include:
- **Damage**, encompassing trampling and vegetation wear, soil compaction and erosion, trampling can also cause direct mortality for some fauna;
 - **Contamination**, including nutrient enrichment (e.g. dog fouling), litter, invasive species;
 - **Fire**, increased incidence and risk of fire;

- **Disturbance**, involving birds and other animals changing their behaviour, physiological impacts and even mortality impacts as a result of people (and their pets);
- **Other**, all other impacts, including harvesting and activities associated with site management, for example difficulties in achieving necessary grazing.

4.10 Impacts from recreation have been addressed strategically by Stroud District Council and there are strategic mitigation schemes in place to address risks for Rodborough Common SAC, the Cotswold Beechwoods SAC and the Severn Estuary SAC/SPA/Ramsar. For the avoidance of doubt, Stagholt Farm falls outside the zone of influence that has been identified for Rodborough Common (see Map 2), and therefore likely significant effects are not triggered for that site. For the Cotswold Beechwoods SAC and the Severn Estuary SAC/SPA/Ramsar, recreation use is a recognised threat and Stagholt Farm lies within the relevant zone of influence. As such any development should only proceed with mitigation secured, potentially through the mitigation strategies. These mitigation strategies were not in place or have been significantly updated since the 2015 adopted Stroud Local Plan (but see Policy ES6 for the relevant policy hooks).

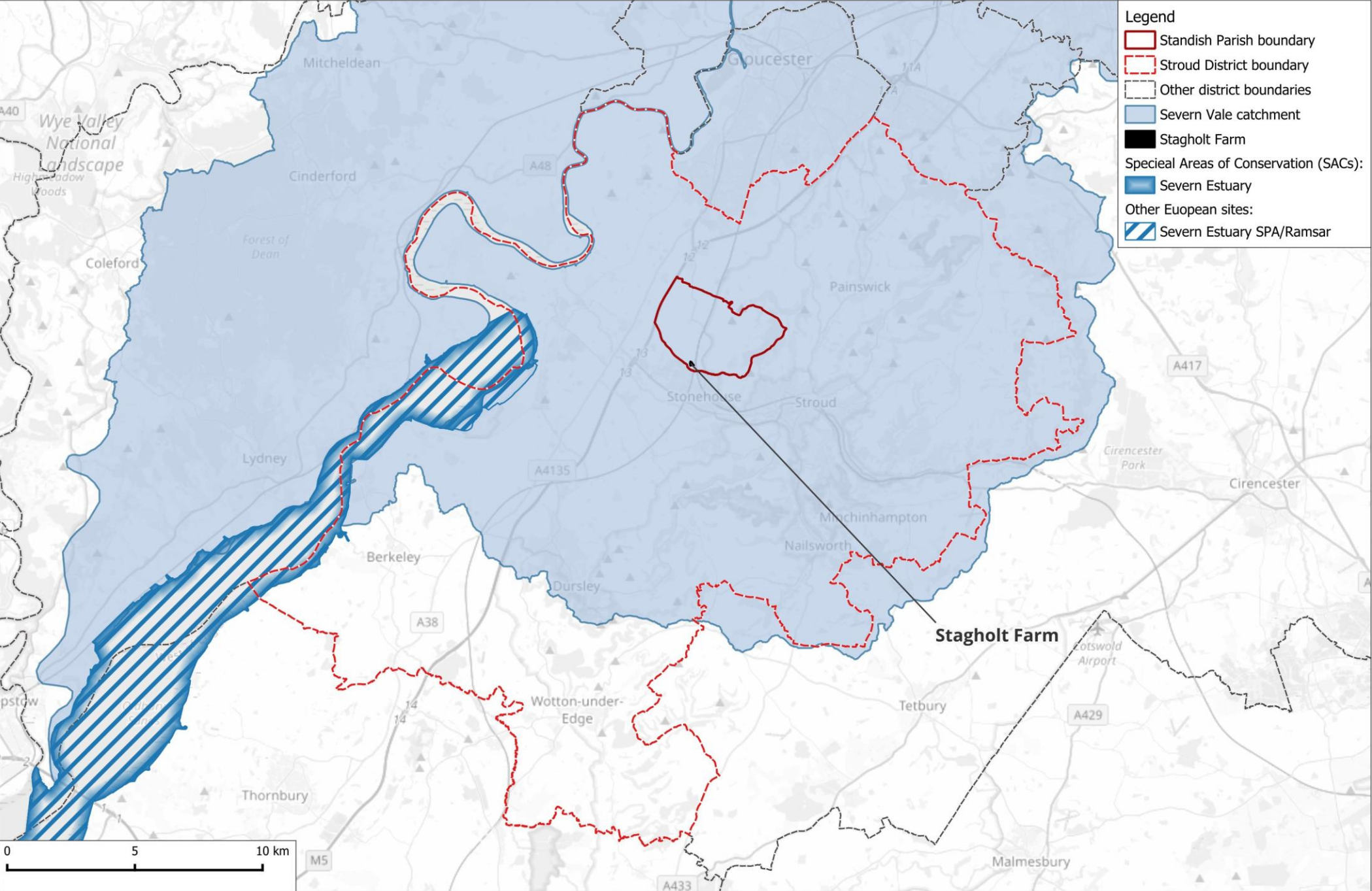
Map 2: Relevant zones of influence for mitigation strategies around Standish Parish



Hydrology

- 4.11 Issues in relation to water quality are relevant to the Severn Estuary SAC/SPA/Ramsar and relate to instances where increased run-off from hard surfaces, outflow from sewage treatments and overflow from septic tanks can lead to increased nutrient load and decreased water quality. These issues have been well-documented. In recent years the need to mitigate for these effects has been emphasised by Natural England in their bid for all new developments to reach 'nutrient neutrality' in relation to potential impacts to water quality. This has resulted in a number of 'nutrient neutrality' schemes across the country, although as yet such scheme does not exist for the Severn Estuary. Water quality issues could be exacerbated by changes in water quantity, for example through abstraction or changes in the way drainage works within the catchment.
- 4.12 Any future development at Stagholt Farm, which lies within the Severn Estuary catchment (see Map 3), will be required to refer to the latest River Basin Management Plans and updated Severn Trent Water's Resources Management Plan. Using these plans, it will be possible to understand how resources will be delivered and ensure that infrastructure is sufficient to cope with any new development and will not lead to a decrease in water quality or quantity.

Map 3: Severn Vale Catchment in relation to the Standish Parish boundary



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Air quality

- 4.13 Impacts from air quality are associated with atmospheric pollution (from ammonia, nitrous oxides and nitrogen) related to increased traffic associated with development. The atmospheric pollutants will lead to an increase in nitrogen deposition and as such can lead to a change in species composition (as a result of more acidic soils) and the direct mortality of some species which are less tolerant of these polluted conditions. The impacts will vary markedly, depending on the site fabric, distance from the roadside and volume of traffic. European sites close to or adjacent to the roadside are particularly vulnerable, however prolonged increase in traffic volume can also cause damage over time.
- 4.14 Potential risks from future development at Stagholt Farm and air quality relate to the risks of increased traffic on roads within 200m of the Cotswold Beechwoods SAC and Rodborough Common SAC. Relevant roads are shown in Map 4 of the Local Plan Review HRA. For the avoidance of doubt, this shows there are no roads of concern within 200m of the Severn Estuary SAC/SPA/Ramsar. In relation to Rodborough Common SAC, while the site is bisected by numerous minor roads, there is only a very limited portion of the A46 within 200m and an extended length of the A46 runs through the Cotswold Beechwoods SAC.
- 4.15 If development were to come forward at Stagholt Farm, it would be necessary to rule out harm from increased traffic and air quality, with detailed assessment necessary to take into account the likely increase in traffic and implications in terms of the critical loads/levels for the relevant sites/habitats. Nutrient deposition modelling is likely to be necessary to fully assess the impacts and mitigation may be required.

5. Integrity Test

- 5.1 Policies 6A and 6B relate to the PAS and PS19a. They do not allocate Stagholt Farm for development but nonetheless potentially provide a means by which development could come forward at that location and with the policies in place, development could be more likely. As such, likely significant effects cannot be ruled out for a number of European sites and impact pathways.
- 5.2 The Standish Neighbourhood Development Plan has been subject to an appropriate assessment, however this assessment can only draw on the potential risks that might relate to the location, in the absence of any other details. As such, in the absence of any mitigation and without any protective wording in place, it is not possible to rule out adverse effects on integrity in relation to:
- Mobile species & functionally-linked land: Severn Estuary SAC/SPA/Ramsar;
 - Recreation: Cotswold Beechwoods SAC, Severn Estuary SAC/SPA/Ramsar;
 - Hydrological issues (water quality and water quantity): Severn Estuary SAC/SPA/Ramsar;
 - Air quality: Cotswold Beechwoods SAC, Rodborough Common SAC.

Potential modifications to the Plan

- 5.3 In order to address the uncertainty and ensure protection for European sites we recommend that the Plan include protective wording to ensure, should development come forward, project level HRA and necessary mitigation secured prior to any approval. Wording could be added to Policy 6 (or elsewhere in the Plan) to state:
- 5.4 Any planning application should be supported by a shadow Habitats Regulations Assessment and the necessary evidence to allow Stroud District Council, as competent authority, to rule out adverse effects on integrity, alone or in-combination, for any European site. This may require mitigation measures to be incorporated into the application and contribution to any strategic mitigation scheme in place at the time.
- 5.5 With such protective wording added, the Plan can be concluded to be compliant with the Habitats Regulations 2017, as amended. The protective

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wording would eliminate any doubt and enable a conclusion of no adverse effect on integrity, for all European sites, alone or in-combination.

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Appendix 1: Summary of relevant European sites

Summary of European sites and their interest features. Links in the site column relate to the relevant page on the designated sites part of the Natural England website. # in the interest features column denotes an interest feature for which the UK has a special responsibility. Qualifying features are drawn from the Natural England designated site view; descriptions reflect text on the designated sites view page or that used in other relevant documents (such as the site improvement plan).

European site	Qualifying features	Description
Cotswold Beechwoods SAC	H6210# Semi-natural dry grasslands and scrubland facies: on calcareous substrates (<i>Festuco-Brometalia</i>) H9130 <i>Asperulo-Fagetum</i> beech forests	The Cotswolds Beechwoods represent the most westerly extensive blocks of <i>Asperulo-Fagetum</i> beech forests in the UK. The woods are floristically richer than the Chilterns, and rare plants include red helleborine <i>Cephalanthera rubra</i> , stinking hellebore <i>Helleborus foetidus</i> , narrow-lipped helleborine <i>Epipactis leptochila</i> and wood barley <i>Hordelymus europaeus</i> . There is a rich mollusc fauna. The woods are structurally varied, including blocks of high forest and some areas of remnant beech coppice.
Rodborough Common SAC	H6210# Semi-natural dry grasslands and scrubland facies: on calcareous substrates (<i>Festuco-Brometalia</i>)	Rodborough Common is the most extensive area of semi-natural dry grasslands surviving in the Cotswolds of central southern England, and represents CG5 <i>Bromus erectus</i> – <i>Brachypodium pinnatum</i> grassland, which is more or less confined to the Cotswolds. The site contains a wide range of structural types, ranging from short turf through to scrub margins, although short-turf vegetation is mainly confined to areas of shallower soils.
Severn Estuary SAC	H1170 Reefs H1130 Estuaries H1140 Mudflats and sandflats not covered by seawater at low tide H1110 Sandbanks which are slightly covered by sea water all the time S1099 <i>Lampetra fluviatilis</i> : River Lamprey S1095 <i>Petromyzon marinus</i> : Sea Lamprey	The Severn Estuary is located between Wales and England in south-west Britain. It is a large estuary with extensive intertidal mud-flats and sand-flats, rocky platforms and islands. Saltmarsh fringes the coast backed by grazing marsh with freshwater ditches and occasional brackish ditches. The subtidal seabed is rock and gravel with subtidal sandbanks. The site also supports reefs of the tube forming worm <i>Sabellaria alveolata</i> . The estuary's classic funnel shape, unique in the UK, is a factor causing the Severn to have one of the highest tidal ranges in the world. A

European site	Qualifying features	Description
	S1103 <i>Alosa fallax</i> : Twaite Shad H1330 Atlantic salt meadows (<i>Glaucopuccinellietalia maritima</i>)	consequence of the large tidal range is an extensive intertidal zone, one of the largest in the UK. The tidal regime results in plant and animal communities typical of the extreme physical conditions of liquid mud and tide-swept sand and rock. The species-poor intertidal invertebrate community includes high densities of ragworms, lugworms and other invertebrates forming an important food source for passage and wintering waders and fish. The site is of importance during the spring and autumn migration periods for waders, as well as in winter for large numbers of waterbirds, especially swans, ducks and waders.
Severn Estuary SPA	Waterbird assemblage A394(NB) <i>Anser albifrons albifrons</i> : Greater White-fronted Goose A037(NB) <i>Cygnus columbianus bewickii</i> : Bewick Swan A048(NB) <i>Tadorna tadorna</i> : Common Shelduck A051(NB) <i>Anas strepera</i> : Gadwall A149(NB) <i>Calidris alpina alpina</i> : Dunlin A162(NB) <i>Tringa totanus</i> : Common Redshank	As above.
Severn Estuary Ramsar	The Ramsar listing is for a number of criteria relating to estuarine habitat communities and migratory fish (Salmon <i>Salmo salar</i> , Sea Trout <i>S. trutta</i> , Sea Lamprey <i>Petromyzon marinus</i> , River Lamprey <i>Lampetra fluviatilis</i> , Allis Shad <i>Alosa alosa</i> , Twaite Shad <i>A. fallax</i> , and Eel <i>Anguilla anguilla</i>) in addition to the extensive waterfowl assemblage.	As above