

Greetham Neighbourhood Plan

Sustainability Appraisal/ Strategic Environmental Assessment & Habitat Regulations Assessment

Screening Report



Rutland
County Council

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Strategic Environmental Assessment and Habitat Regulations Assessment Screening Report for Greetham Neighbourhood Plan

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Strategic Environmental Assessment and Habitat Regulations Assessment Screening Report for Greetham Neighbourhood Plan

1. Introduction

- 1.1 This screening report is designed to determine whether or not the contents of the Pre-submission draft Greetham Neighbourhood Plan (January 2015) (GNP) requires a Strategic Environmental Assessment (SEA) in accordance with the European Directive 2001/42/EC and associated Environmental Assessment of Plans and Programmes Regulations 2004.
- 1.2 This report will also screen whether or not the GNP requires a Habitats Regulations Assessment (HRA) in accordance with Article 6(3) of the EU Habitats Directive and with Regulation 61 of the Conservation of Habitats and Species Regulations 2010 (as amended). A HRA is required if 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. As a general 'rule of thumb' sites with pathways of 10-15km of the plan/project boundary should be included with a HRA. Rutland Water Special Protection Area (SPA)/RAMSAR is the only international designated site within a 15km radius of the GNP boundary
- 1.3 This report will also screen whether or not the GNP requires a Habitats Regulations Assessment (HRA) in accordance with Article 6(3) of the EU Habitats Directive and with Regulation 61 of the Conservation of Habitats and Species Regulations 2010 (as amended). A HRA is required if 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. As a general 'rule of thumb' sites with pathways of 10-15km of the plan/project boundary should be included with a HRA. Rutland Water Special Protection Area (SPA)/RAMSAR is the only international designated site within a 15km radius of the GNP boundary.
- 1.4 The purpose of the GNP is to provide a set of statutory planning policies to guide development within Greetham Parish over the life of the plan. The plan sets out the community's views in the emerging vision which is to conserve the historic character and the built character where possible and to significantly enhance the landscape setting and the landscape of the village whilst enhancing biodiversity value and enhancing employment and social opportunities.
- 1.5 The legislative background is referred to in section 2 which outlines the regulations that require the need for this screening exercise. Section 3, provides a screening assessment for both establishing the need for a SEA and the criteria for determining the likely significant environmental effects of the GNP on the environment. Section 4, provides a screening assessment for the GNP of both the likely significant effects of the implementation of the GNP and the need for a Habitats Regulation Assessment
- 1.6 The report is split in two parts. The first part will cover the screening for the SEA and the second will cover the screening process for the HRA. A summary of findings and conclusions for both screening processes can be found in Section 5 at the end of this document.

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2. Legislative Background

Strategic Environmental Assessment (SEA)

- 2.1 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).
- 2.2 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. This is also discussed within the NPPF para 165.
- 2.3 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. This is also discussed within the NPPF para 165.
- 2.4 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. A Neighbourhood Plan is not a development plan document and therefore does not legally require a Sustainability Appraisal. Where appropriate, however, an SEA assessment still needs to be undertaken in line with the SEA regulations.
- 2.5 To fulfil the legal requirement, this report focuses on screening for a SEA and the criteria for establishing whether a full assessment is needed.

Habitat Regulation Assessment (HRA)

- 2.6 It is required by article 6 (3) of the EU Habitats Directive and by regulation 61 of the Conservation of Habitats and Species Regulations 2010 (as amended) 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.
- 2.7 To fulfil the legal requirements to identify if likely significant effects will occur with the implementation of the GNP upon the European Sites (Natura 2000 sites) a screening assessment has been undertaken in Section 4 of this report.

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3. SEA Screening

Criteria for Assessing the Effects of GNP

3.1 Criteria for determining the likely significance of effects referred to in Article 3(5) of Directive 2001/42/EC are set out below:

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 transboundary 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
 - intensive land-use,
 - the effects on areas or landscapes which have a recognised national, Community or international protection status.

Source: Annex II of SEA Directive 2001/42/EC

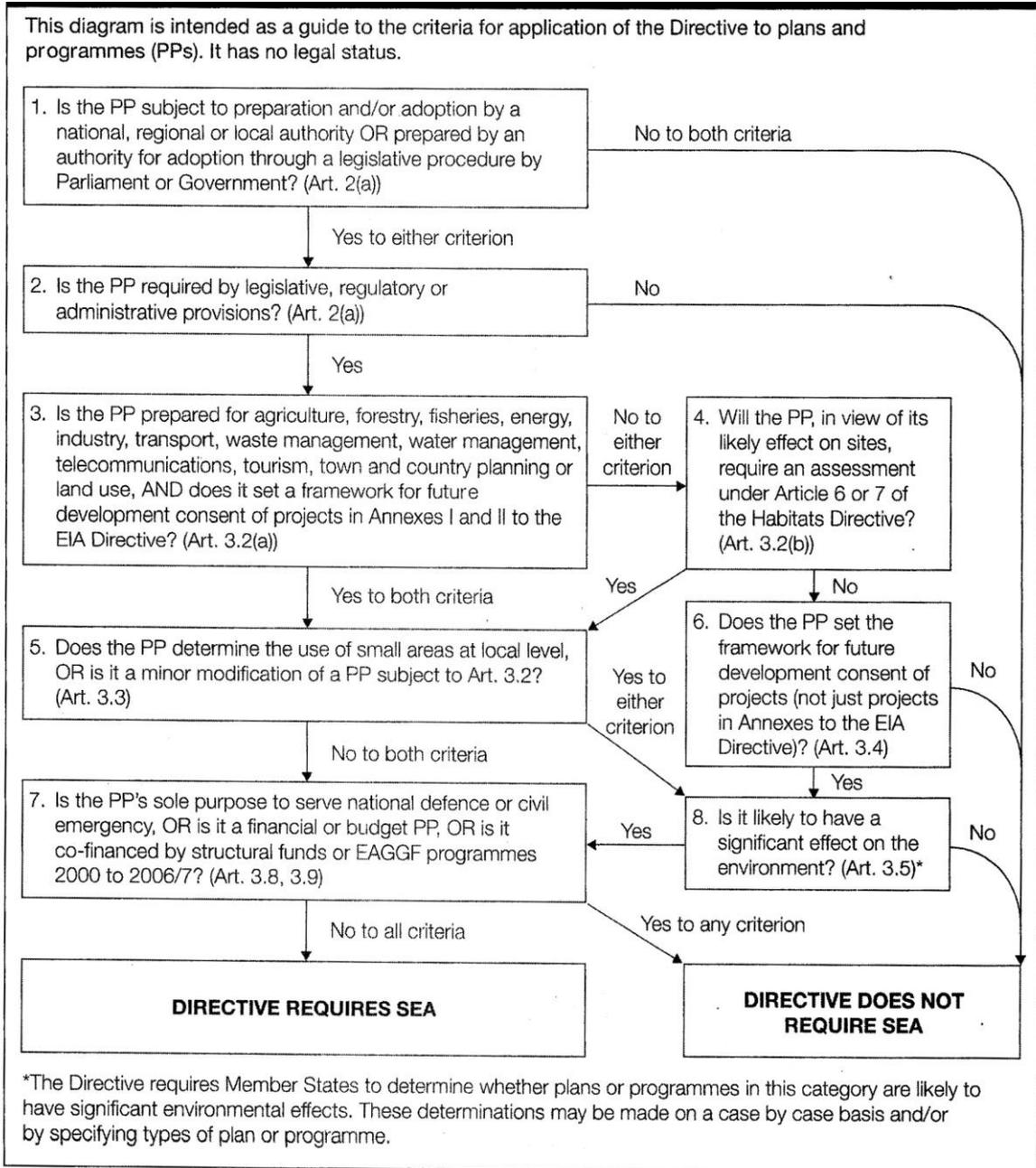
Assessment

- 3.2 The Localism Act (2011) requires that Neighbourhood Plans must be in general conformity with the strategic policies of the Local Plan. Rutland County Council has a Core Strategy Development Plan Document (DPD) which was adopted in July 2011 and a Site Allocations & Policies DPD adopted in October 2014.
- 3.3 The GNP must be in general conformity with the adopted Core Strategy and Site Allocations & Policies DPD. Both documents were subject to a full Sustainability Appraisal which included a SEA assessment. The assessment established there were no likely significant effects arising from the implementation of the Core Strategy and the Site Allocations & Policies DPD, as the assessments ensured mitigation measures were in place.

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3.4 The diagram in figure 1 illustrates the process for screening a planning document to ascertain whether a full SEA is required.

Fig. 1. Application of the SEA Directive to plans and programmes



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3.5 Table 1 shows the assessment of whether the GNP will require a full SEA. The questions below are drawn from the diagram in figure 1 which sets out how the SEA Directive should be applied.

Table 1: Establishing the Need for SEA

Stage	Y/ N	Reason
1. Is the PP (plan or programme) subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority for adoption through a legislative procedure by Parliament or Government? (Art. 2(a))	Y	This neighbourhood plan is prepared by Greetham Parish Council (as the Qualifying Body) under the provisions of the Town and Country Planning Act 1990 as amended by the Localism Act 2011. Once the plan is 'made' subject to examination and having received 50%+ or more 'yes' votes through a referendum it will be adopted by Rutland County Council and become part of the Statutory Development Plan for the area.
2. Is the PP required by legislative, regulatory or administrative provisions? (Art. 2(a))	N	Communities have a right to produce a Neighbourhood Plan; however communities are not required by legislative, regulatory or administrative purposes to produce a Neighbourhood Plan. However, once 'made' the Greetham Neighbourhood Plan would form part of the statutory development plan, and will be used when making decisions on planning applications within the Neighbourhood Area. Therefore it is considered necessary to answer the following questions to determine further if an SEA is required
3. Is the PP prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water 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? (Art 3.2(a))	Y	The plan covers some of the topics identified in the list and it could sets out a framework for future development of the scale that would fall under Annex II of the EIA Directive. However for Neighbourhood Plans, developments which fall under Annex I of the EIA Directive are "excluded development" as set out in Section 61k of the Town and Country Planning Act 1990 (as amended by the Localism Act)
4. Will the PP, in view of its likely effect on sites, require an assessment for future development under Article 6 or 7 of the Habitats Directive? (Art. 3.2 (b))		N/A
5. Does the PP Determine the use of small areas at local level, OR is it a minor modification of a PP subject to Art. 3.2? (Art. 3.3)	Y	The Greetham Neighbourhood Plan covers the parish of Greetham (local level). A neighbourhood plan can determine the use of small areas at a local level.
6. Does the PP set the framework for future development consent of projects (not just projects in annexes to the EIA Directive)? (Art 3.4)	Y	Once 'made' the Greetham Neighbourhood Plan will form part of the statutory development plan and sets policies which planning applications within the GNP area must adhere to. It therefore sets the framework for future developments at a

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		local level.
7. Is the PP's sole purpose to serve the national defence or civil emergency, OR is it a financial or budget PP, OR is it co-financed by structural funds or EAGGF programmes 2000 to 2006/7? (Art 3.8, 3.9)		N/A
8. Is it likely to have a significant effect on the environment? (Art. 3.5)	N	None identified. See Table 2 to understand the determination of likely significant effects

Table 2: Criteria for determining the likely significance of effects on the environment from Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004

Criteria (from Annex II of the SEA Directive and Schedule 1 of Regulations)			
1. Characteristics of the plans and programmes, having regard, in particular to:		Is there a significant environmental impact?	Justification
1a	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.	N	The GNP will provide policies in addition to existing policies within the Core Strategy and Site Allocations & Policies DPD (which have already been subject to SA and SEA) that set the broad framework. The GNP does not allocate any land for development.
1b	The degree to which the plan or programme influences other plans and programmes including those in a hierarchy	N	The GNP will introduce new policies but will be in general conformity with other plans in the hierarchy. It supports the implementation of higher tier policies at the Neighbourhood Plan Area level. It is not therefore considered to have significant influence on other plans and programmes or their effects on the environment.
1c	The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development	N	The GNP aims to support sustainable development through determining applications. It is anticipated that the GNP may have a positive impact in the local area to which the policy is applied. The likelihood of significant effects on the environment therefore is minimised.
1d	Environmental problems relevant to the plan or programme	N	The GNP itself will not result in any environmental problems beyond those already identified in the SA of the Core Strategy & Site Allocations & Policies DPD. It is anticipated that the GNP may have a positive impact in the local area to which the policy is applied through minimising environmental problems arising
1e	The relevance of the plan or programme for the implementation of [European] Community legislation on the	n/a	The GNP has to be in conformity with the Local Plan. The Local Plan for Rutland has had regard to European Community legislation on the

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	environment (for example, plans and programmes linked to waste management or water protection)		environment and therefore this legislation is not considered relevant to this criterion.
2. Characteristics of the effects and of the area likely to be affected [by the GNP], having regard, in particular, to:		Is there a likely significant environmental impact?	Justification
2a	The probability, duration, frequency and reversibility of the effects	N	The duration of the effects is specific to the outcome of the planning permission but it is anticipated that this guidance will minimise detrimental effects.
2b	The cumulative nature of the effects	N	The cumulative effects of the GNP are likely to be positive although only on a local scale.
2c	The trans-boundary nature of the effects	N	The GNP is unlikely to have a significant impact on neighbouring areas..
2d	The risk to human health or the environment (for example, due to accidents)	N	It is considered that the GNP presents no risks to human health or the environment.
2e	The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)	N	The GNP will be applied to all planning applications in the parish of Greetham determined by Rutland County Council. The effects of the GNP will more likely be felt at a much more local scale (i.e. site or neighbourhood).
2f	The value and vulnerability of the area likely to be affected due to: i) Special natural characteristics or cultural heritage; ii) ii) exceeded environmental quality standards or limit values; or iii) intensive land-use	N	These issues will be dealt with through the planning application process. The GNP provides policies for Greetham parish in addition to the existing Development Plans. The anticipated effects should therefore be positive for this criterion. The GNP provides additional planning policy for Greetham which in itself it will not have a significant effect.
2g	The effects on areas or landscapes which have a recognised national, Community or international protection status.	N	None identified. The GNP provides additional planning policy for Greetham which in itself will not have a significant effect. Any applications for development will be required to satisfy the relevant policies for protection of the character of the area before permission is granted.

Screening Outcome

- 3.6 On the basis of the assessments in Table 1 & 2, it is considered there will not be any likely significant environmental effects arising from the Greetham Neighbourhood Plan. The Full SA/SEA of the Core Strategy and the Site Allocations and Policies Development Plan Documents established there were no likely significant effects arising from the implementation of policies on these documents in the area, as the assessments ensured mitigation measures were in place. . As such, the GNP does not require a full SEA to be undertaken.

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4. HRA Screening

HRA Process

- 4.1 The initial stage of the HRA process is called the screening stage and determines if there are any likely significant effects possible as a result of the implementation of the plan with reference to other plans or projects, in particular the Core Strategy and the Site Allocations & Policies DPD for any European site. Only if a 'significant effect' is likely would trigger the need for an Appropriate Assessment of the Greetham Neighbourhood Plan to be undertaken.
- 4.2 The screening process should provide a description of the plan and an identification of the Natura 2000 sites which may be affected by the plan and assess the significance of any possible effects on the identified sites.

Relevant Natura 2000 sites

- 4.3 Rutland Water Special Protection Area (SPA)/RAMSAR is the only international designated site within a 15km radius of the GNP boundary. Therefore the HRA screening assessment needs to identify if any likely significant effects will be caused by the implementation of the GNP.

Rutland Water SPA/RAMSAR

- 4.4 Rutland Water is a man made pump storage reservoir created by the damming of the Gwash Valley in 1975 and is the largest reservoir in the United Kingdom. In general the reservoir is drawn down in the summer and filled during the autumn and winter months when river levels are high. The main habitats are open water and a mosaic of lagoons, reedswamp, marsh, old meadows, scrub and woodland. The lagoons are one of the most important areas for wintering wildfowl.
- 4.5 The interest features in relation to the site as an SPA and RAMSAR are provided in table 3.

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Table 3. Interesting Features of Rutland Water SPA/RAMSAR

Designation	Interesting Features
SPA	<p>Qualifies under Article 4.2 by supporting populations of European importance of the following migratory species over winter:</p> <ul style="list-style-type: none"> - Shoveler <i>Anas clypeata</i> - Teal <i>Anas crecca</i>* - Wigeon <i>Anas Penelope</i>* - Gadwall <i>Anas strepera</i> - Tufted Duck <i>Aythya fuligula</i>* - Goldeneye <i>Bucephala clangula</i>* - Mute Swan <i>Cygnus atria</i>* - Goosander <i>Mergus merganser</i>* - Great Crested Grebe <i>Podiceps cristatus</i>* <p>Qualifies under Article 4.2 by regularly supporting at least 20,000 waterfowl.</p> <p>* Species that may be removed following the SPA Review *Stroud et al, 2001; The UK SPA network: its scope and content, JNCC)</p>
RAMSAR	<p>RAMSAR criterion 5 – Assemblages of international importance</p> <p>Species with peak counts in winter:</p> <ul style="list-style-type: none"> - 19274 waterfowl (5 year peak mean 1998-99 – 2002/2003) <p>RAMSAR criterion 6 – Species/populations occurring at levels of international importance</p> <p>Qualifying Species:</p> <ul style="list-style-type: none"> - Gadwall <i>Anas strepera</i> - Northern shoveler <i>Anas clypeata</i>

- 4.6 The sensitivities and vulnerabilities of the site have been identified in HRA assessments for Rutland County Council's Core Strategy and Site Allocations and Policies Development Plan Documents.
- 4.7 The HRA identified that the most noticeable species are the populations of gadwall and shoveler. Data on the use of the site by these species indicate the gadwall and shoveler numbers peak in the autumn, generally around September/October, before declining over the winter period.
- 4.8 This suggests that Rutland is mainly used as a refuge whilst species are moulting in early autumn, before dispersing from the site to other wintering areas as winter progresses. During the winter, gadwall and shoveler occupy more extensive open waters of lakes, reservoirs and gravel pits.

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- 4.9 Threats include disturbance and water pollution. The principle sensitivities and vulnerabilities of Rutland Water include:
- Water Quality. The level of phosphate can vary above the recommended level at certain times of the year. This increases the risk of a shift in the trophic status of the water body to an algae dominated system, which would adversely affect the site;
 - Water level. The water level is linked to abstraction and affects accessible aquatic plants are for wildfowl feeding on the site. The ecological perturbation that frequent lowering and raising of water levels causes could be an important factor in whether or not a switch in trophic status occurs.
 - Recreation. Management of the trout fishery has caused some debate over potential effects on site ecology. In addition, water sports such as sailing have the potential to affect the site through disturbance. Casual recreation around the site margins may also affect some interest features. The site and the interest features are most likely to be vulnerable to disturbance during the key autumn period.
- 4.10 The HRA considered that both the Core Strategy and the Site Allocations & Policies DPDs would have no likely significant effects on any European sites in combination with any other adopted planning documents; the protective policies contained within the DPD, and similar policies within other plans, will ensure this outcome.
- 4.11 Therefore, in the context that the Greetham Neighbourhood Plan does not propose to allocate land specifically for new development and the policies within the GNP are in conformity with the Core Strategy and Site Allocations & Policies DPD, it is considered that there will be no requirement to undertake an Appropriate Assessment of the Greetham Neighbourhood Plan.
- 4.12 Although the Greetham Neighbourhood Plan does not propose to allocate land specifically for new development, any windfall development that comes forward in the Greetham Neighbourhood Plan area will be subject to Core Strategy Polices CS4 – ‘Location of Development’ and Site Allocations & Policies DPD Policy SP5 – ‘Built Development in the towns and villages’.
- 4.13 An assessment of likely significant effects has been undertaken for all policies in the Greetham Neighbourhood Plan. Table 4 below presents a HRA Screening for the Greetham Neighbourhood Plan (Please note: Table 4 has been updated at the pre-submission stage and can be found as an Addendum to this report).

Table 4: Establishing the Need for an Appropriate Assessment

Greetham NP Policy	Detail of Policy to be Screened	Comment	Likely Significant Effect
HD1	Housing Numbers	This policy does not specifically allocate land for development – it supports up to 60 new houses which already have planning consent and up to 1 or 2 additional houses on windfall sites each year. This policy itself will not lead to	No likely significant effect

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Greetham NP Policy	Detail of Policy to be Screened	Comment	Likely Significant Effect
		development, it supports Rutland Local Plan policy which has been assessed as having no negative effects by a HRA	
HD2	Housing Stock	Policy is similar to existing Rutland Local Plan policy which has been assessed as having no negative effects by a HRA	No likely significant effect
HD3	Housing Density	This Policy proposes a lower density than in the Local Plan and would not lead to additional development beyond that expected to come forward in the Local Plan. The existing Rutland Local Plan policy has been assessed as having no negative effects by a HRA	No likely significant effect
HD4	Car Parking	This Policy sets out the minimum parking standards for residential development to reduce on road parking.	No likely significant effect
HD5	Built Form	This policy itself will not lead to development, it sets criteria for appropriate building materials	No likely significant effect
HD6	Housing Levy	This Policy itself will not lead to development, it supports CIL expenditure on improvements to the village.	No likely significant effect
HD7	Housing for the Elderly	This policy itself will not lead to development, it sets out design criteria for housing for the elderly.	No likely significant effect
HD8	Housing Development and the Environment	This Policy itself will not lead to development, it sets out landscaping criteria for around development	No likely significant effect
HD9	Protection of Important Open Spaces	This Policy itself will not lead to development, it supports Local Plan Policy SP21 for important open spaces which has been assessed as having no negative effects by a HRA	No likely significant effect

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- 4.14 The findings show that the policies will have no likely significant effect upon Rutland Water. Most policies are similar and in conformity to those in both the adopted Core Strategy and Site Allocations & Policies DPD, which were subject to a HRA that confirms no significant effects are likely. As such, the implementation of the GNP will not result in any likely significant effects upon Rutland Water.

In combination effects

- 4.15 Regulation 102 of the Habitats Regulations 2010 requires an appropriate assessment where a land use plan (not directly connected with or necessary to the management of the site) is likely to have a significant effect on a European site, either alone or in combination with other plans or projects
- 4.16 There are a number of potentially relevant plans and projects which may result 'in combination' effects for the GNP, a useful starting point to determine whether the GNP may result in 'in combination' effects is the HRA's undertaken for Rutland County Council's Core Strategy and Site Allocations & Policies DPD's. Both these HRA's identified possible 'in combination' effects in relation to development and regional water resource demands on Rutland Water.
- 4.17 However, in mitigation, the Water Cycle Study identifies that there is either sufficient capacity within the sewerage network to avoid significant effects on Rutland Water, or works will be able to improve their treatment levels within the limits of conventional wastewater treatment technology to allow for increased discharges from the Waste water Treatment Works (WwTWs).
- 4.18 The screening assessment undertaken concludes that no likely significant effects in relation to the Rutland Water SPA/RAMSAR site will occur as a result of the implementation of the Core Strategy and Site Allocations & Policies DPD's.

Screening Outcome

- 4.19 The Greetham Neighbourhood Plan does not go beyond the requirements set out in the Core Strategy & the Site Allocations & Policies DPD, consequently, it is considered that no significant 'in combination' likely effects will occur from the implementation of the GNP. As such, the Greetham Neighbourhood Plan does not require a full HRA to be undertaken.

5. Conclusions and Recommendations of the Screening Assessments

SEA

- 5.1 A screening assessment was undertaken to determine the need for a SEA in line with regulations and guidance and can be found in Section 3 of this report. The assessment finds no likely significant effects will occur as a result of the GNP. The assessment finds many of the policies are in conformity with the local plan policies which have a full SA/SEA and which identified no likely significant effects will occur as a result of the implementation of policies.
- 5.2 From the findings of the screening assessment it is recommended that a full SEA does not need to be undertaken for the GNP.

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HRA

- 5.3 A screening assessment was undertaken to determine the need for a HRA in line with regulations and guidance and can be found in section 4 of this report. The assessment finds no likely significant effects will occur as a result of the GNP. The assessment finds many of the policies are in conformity with the local plan policies, which have undergone a full HRA which identified no likely significant effects will occur as a result of the implementation of policies. It is also identified that no likely in combination significant effects will occur as a result of the implementation of the GNP.
- 5.4 From the findings of the screening assessment it is recommended that a full HRA does not need to be undertaken for the GNP.

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6. Addendum

Table 4: Establishing the Need for an Appropriate Assessment

Greetham NP Policy	Detail of Policy to be Screened	Comment	Likely Significant Effect
CH1	Built Form	This policy itself will not lead to development, it sets criteria for appropriate building materials.	No likely significant effect
CH2	Green Infrastructure	This Policy itself will not lead to development, it sets out landscaping criteria for around development and supports Local Plan Policies SP21 for important open spaces and CS23 for green infrastructure which have been assessed as having no negative effects by a HRA.	No likely significant effect
HD1	Housing Numbers	This policy does not specifically allocate land for development – it supports up to 60 new houses which already have planning consent and up to 1 or 2 additional houses on windfall sites each year. This policy itself will not lead to development, it supports Rutland Local Plan policy which has been assessed as having no negative effects by a HRA.	No likely significant effect
HD2	Housing Mix	Policy is similar to existing Rutland Local Plan policy which has been assessed as having no negative effects by a HRA.	No likely significant effect
HD3	Car Parking	This Policy sets out the minimum parking standards for residential development to reduce on road parking.	No likely significant effect
HD4	Community Infrastructure Levy	This Policy itself will not lead to development, it supports CIL expenditure on improvements to the village.	No likely significant effect
HD5	Locations to avoid for future development	This policy itself will not lead to development and mitigates against the risk of flooding.	No likely significant effect
HD6	Monitoring and Review	This policy itself will not lead to development and ensures the Plan is monitored and reviewed every 3-5 years.	No likely significant effect