Monmouthshire Council Local Flood Risk Management Strategy

Habitats Regulations Assessment - Screening

July 2025

Prepared for:
Monmouthshire Council

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Document Status

Issue date	July 2025
Issued to	Monmouthshire County Council
BIM reference	KYW-JBAU-XX-XX-RP-EN-0002-S3-P02-HRA
Revision	S3-P02
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This report describes work commissioned by Monmouthshire County Council. The Client's representative for the contract was Ross Price of Monmouthshire County Council. Isabella Kelsey BSc and Katie Ford BSc of JBA Consulting carried out this work.

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The methodology adopted and the sources of information used by JBA in providing its services are outlined in this Report. The work described in this Report was undertaken in January 2024, and has been updated in July 2025, and is based on the information available during the said period. The scope of this Report and the services are accordingly factually limited by these circumstances.

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Abbreviations

DPD	Development Planning Document
EC	European Community
FCERM	Flood and Coastal Erosion Risk Management (R&D programme)
FRMP	Flood Risk Management Plan
JNCC	Joint Nature Conservation Committee
IROPI	Imperative Reasons of Overriding Public Interest
LFRMS	Local Flood Risk Management Strategy
LLFA	Lead Local Flood Authority
LRF	Local Resilience Forum
MCC	Monmouthshire County Council
Ramsar	The intergovernmental Convention on Wetlands, signed in Ramsar, Iran, in 1971
RMA	Risk Management Authority
SAC	Special Area of Conservation, protected under the EU Habitats Directive
SEA	Strategic Environmental Assessment
SPA	Special Protection Area for birds, protected under the EU Habitats Directive
SSSI	Site of Special Scientific Interest
WFD	Water Framework Directive

Executive Summary

The Welsh Government's National Strategy for Flood and Coastal Erosion Risk Management (FCERM) in Wales (National Strategy) sets out that over 245,000 properties across Wales are at risk of flooding from rivers, the sea and surface water, with almost 400 properties also at risk from coastal erosion. The National Strategy explains that, as the climate changes, we can expect those risks to increase, with more frequent and severe floods, rising sea levels and faster rates of erosion of the coast.

Storm events such as those of October 2019, February and December 2020 demonstrated how vulnerable some communities within Monmouthshire are to flooding, with that risk likely to increase with the onset of climate change. Storm Dennis (February 2020) alone resulted in flooding to almost 200 homes and 50 business across Monmouthshire. These events emphasise the need for Monmouthshire County Council (MCC) to have in place robust strategic priorities for managing local flood risk to help improve community resilience and adaptation to climate change.

Under the Flood and Water Management Act 2010, MCC has been established as the Lead Local Flood Authority (LLFA) for its administrative area. This Act requires all 22 LLFAs in Wales to produce, develop, maintain, apply and monitor a Local Flood Risk Management Strategy (Local Strategy) for their administrative area.

Different Risk Management Authorities (RMAs) in Wales are responsible for different sources of flood risk. As a LLFA, MCC are responsible for "local flood risk" which is defined as flood risk from:

- Surface water runoff
- Groundwater; and
- Ordinary watercourses (generally smaller watercourses)

This report details the Screening Stage of the Habitats Regulations Assessment of the Local Flood Risk Management Strategy (LFRMS) that has been developed by Monmouthshire Council. It is intended to identify, describe, and assess the likely significant effects of implementing the strategy on European designated sites (Special Areas of Conservation (SAC) and Special Protection Areas (SPA)) and also Ramsar sites within and around Monmouthshire district.

The screening Assessment for the Local Flood Risk Management Scheme concluded that no significant impacts as a result of The Monmouthshire LFRMS will occur from the objectives of the strategy, and therefore in-combination assessment and further assessment is not required.

1 Introduction

1.1 Introduction

This report details the Screening Stage of the Habitats Regulations Assessment of the Local Flood Risk Management Strategy (LFRMS) that has been developed by Monmouthshire County Council. It is intended to identify, describe and assess the likely significant effects of implementing the strategy on European designated sites (Special Areas of Conservation (SAC) and Special Protection Areas (SPA)) and also Ramsar sites within and around Monmouthshire.

1.1.1 The Local Flood Risk Management Strategy

The Flood and Water Management Act 2010 determined the need for flood risk to be managed within the framework of National Strategies for England and Wales and within Local Strategies for each Local Flood Authority Area.

This Local Strategy focuses on these local sources of flood risk within Monmouthshire but acknowledges and considers other sources of flood risk (including main rivers, sea, and sewers) and associated responsible RMAs.

The National Strategy sets out the legislative context to FCERM activities in Wales. In certain cases, Local Authorities are also required to produce Flood Risk Management Plans (FRMP), under the 2009 Flood Risk Regulations.

1.2 Habitats Regulations Assessment

1.2.1 Legislative Context

The Conservation of Habitats and Species Regulations 2017 (as amended by the Conservation of Habitats and Species (amendment) (EU Exit) Regulations 2019), also known as the 'Habitats Regulations', provide legal protection to habitats and species of national importance. The regulations also secure an ecological network of protected sites, consisting of SACs and SPAs. Government guidance also requires that Ramsar sites (which support internationally important wetland habitats and are listed under the Convention on Wetlands of International Importance [Ramsar Convention]) are given the same level of protection as SACs and SPAs.

Prior to the UK's withdrawal from the EU, SACs were designated and protected under domestic legislation transposed from European Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Flora and Fauna (Habitats Directive), and SPAs under European Directive 2009/147/EC on the Conservation of Wild Birds (Birds Directive). Together these sites formed a European-wide Natura 2000 network of protected sites.

Since 31 December 2020, SACs and SPAs within the UK no longer fall within the Natura 2000 network, and instead form a National Site Network. SPAs and SACs continue to be referred to collectively as ‘European sites’ within the context of the Habitats Regulations, reflecting their international importance for the conservation of biodiversity.

SACs and SPAs within the National Site Network are also still designated for habitats listed on Annex I and for species listed on Annex II of the Habitats Directive, and criteria listed under the Birds Directive, and it is these Annex I habitats, Annex II species and Birds Directive Criteria against which assessments under the Habitats Regulations are still made.

It is a requirement of Regulation 105 of the Habitats Regulations that where a plan is likely to have a significant effect on a European site, either alone or in-combination with other plans or projects, and where it is not directly connected with or necessary to the management of the site "the plan-making authority for that plan must, before the plan is given effect, make an appropriate assessment of the implications for the site in view of that site's conservation objectives".

Therefore, for all plans that are not wholly directly connected with, or necessary to, the conservation management of the site’s qualifying features, a formal Screening for any Likely Significant Effects (either alone or in-combination with other plans or projects) on a European site is required. This Screening Assessment is based on available ecological information on the designated site(s), other plans, projects, and policies relevant to the area and details of the proposed development/policy.

If the Screening Assessment concludes that the plan is likely to have a significant effect on the conservation objectives of the site(s), or that such an effect cannot be ruled out (adopting a precautionary approach) an Appropriate Assessment must be carried out. An Appropriate Assessment involves an assessment of the potential effects of the plan on the conservation objectives of the site(s). If significant effects are identified, avoidance measures or mitigation to reduce impacts can be applied.

If it cannot be concluded that the plan will not adversely impact upon the integrity of the site(s), the development will not be able to proceed without further conditions and/or assessment. The plan will need to prove that all alternatives have been considered and that there are imperative reasons of overriding public interest (IROPI) that outweigh the potentially damaging impacts that the plan may have before it can proceed. In this case compensatory measures will be required.

Plans, such as the Monmouthshire LFRMS, are required to undergo HRA if there is the potential for significant impacts and they are not directly connected with or necessary to the management of a European site. As the Plan is not connected with or necessary to the management of SACs, SPAs or Ramsar sites, it is necessary to undertake a HRA of the Plan.

2 HRA Methodology

2.1 HRA Process

HRA follows a four-stage process, based on that detailed in the Department for Communities and Local Government (DCLG) guidance Planning for the Protection of European sites: Appropriate Assessment (2006) and subsequent Government Guidance on the Use of Habitats Regulations Assessment (2019). These stages are described in Table 2-1. This report documents the first stage of the process; Screening.

Other guidance documents have been used to help inform the methodology of this assessment, including:

- Assessment of Plans and Projects Significantly Affecting Natura 2000 Sites: Methodological Guidance on the Provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC (European Commission 2002)
- The Habitats Regulations Assessment Handbook (DTA Publications, 2023).
- Managing Natura 2000 sites: The provisions of Article 6 of the 'Habitats' Directive 92/43/EEC (European Communities, 2018)
- Guidance document on Article 6(4) of the 'Habitats Directive' 92/43/EEC (European Communities, 2007)
- Managing Natura 2000 sites: The provisions of Article 6 of the 'Habitats' Directive 92/43/EEC (European Communities, 2018)
- Guidance document on Article 6(4) of the 'Habitats Directive' 92/43/EEC (European Communities,2007)
- The Planning Inspectorate PINS Note 05/ 2018: Consideration of avoidance and reduction measures in Habitats Regulations Assessment: People over Wind, Peter Sweetman, v Coillte Torana (The Planning Inspectorate, 2018)
- UK Government Guidance on the use of Habitats Regulations Assessment (July 2019) [https://www.gov.uk/guidance/appropriate-assessment]

Table 2-1 The Habitats Regulations Assessment Handbook (DTA Publications, 2023).

Stage / Task	Description
HRA Stage 1: Screening	This process identifies the likely impacts upon a European site of a project or plan, either alone or in-combination with other projects or plans and determines whether these impacts are likely to be significant. If no likely significant effect is determined, the project or plan can proceed. If a likely significant effect is identified, Stage 2 is commenced. Following the People over Wind & Sweetman v Coillte Teoranta Case C-323/17, the assessment does not consider protective, avoidance or mitigation measures for Stage 1 Screening. These measures are carried forward and considered as part of Stage 2.

Stage / Task	Description
HRA Stage 2: Appropriate Assessment	This assessment determines whether a project or plan would have an adverse impact on the integrity of a European site, either alone or in-combination with other projects or plans. This assessment is confined to the effects on the important habitats and species for which the site is designated (i.e. the qualifying interests of the site). Appropriate Assessments, in line with CJEU: Case C-461/17 Holohan v An Bord Pleanála, must also consider impacts upon habitats and species within or outside of a site boundary if they support a qualifying feature and could impact upon the conservation objectives of the site. If no adverse impact is determined, the project or plan can proceed. If an adverse impact is identified, Stage 3 is commenced.
HRA Stage 3: Assessment where no alternatives and adverse impacts remain (Mitigation and Alternatives)	Where a plan or project has been found to have adverse impacts on the integrity of a European site, potential avoidance/mitigation measures or alternative options should be identified. If suitable avoidance/mitigation or alternative options are identified, that results in there being no adverse effects from the project or plan on European sites, the project or plan can proceed. If no suitable avoidance/mitigation or alternative options are identified, as a rule the project or plan should not proceed. However, in exceptional circumstances, if there is an 'imperative reason of overriding public interest' for the implementation of the project or plan, consideration can be given to proceeding in the absence of alternative solutions. In this case, compensatory measures must be put in place to offset negative impacts (Stage 4).
HRA Stage 4: Compensatory measures	Stage 4 comprises an assessment of the compensatory measures where, in light of an assessment of imperative reasons of overriding public interest, it is deemed that the project should proceed.

2.2 HRA Stage 1: Screening Methodology

The principles of ‘screening’ are applied to a plan or its components to allow the assessment stage to focus on those aspects that are most likely to have potentially significant or adverse effects on European sites, as well as shape the developing plan. Screening aims to determine whether the plan will have any ‘likely significant effects’ on any European site as a result of its implementation. It is intended to be a coarse filter for identifying effects (positive and negative) that may occur, to allow the assessment stage to focus on the most important aspects. A plan should be considered ‘likely’ to have an effect if it is not possible (on the basis of objective information) to exclude the likelihood that the plan could have significant effects on any European site, either alone or in-combination with other plans or projects; an effect will be ‘significant’ if it could undermine the site’s conservation objectives.

Screening can be used to 'screen-out' European sites and plan components from further assessment, if it is possible to determine that significant effects are unlikely (e.g., if sites or interest features are clearly not vulnerable (exposed and/or sensitive) to the outcomes of a plan due to the absence of any reasonable impact pathways).

In order to undertake screening of the LFRMS, it is necessary to:

- Identify the European sites within and outside the plan/strategy area likely to be affected, reasons for their designation and their conservation objectives.
- Describe the plan/strategy and their aims and objectives and also those of other plans or projects that in-combination have the potential to impact upon the European sites.
- Identify the potential effects on the European sites.
- Assess the significance of these potential effects on the European sites.

2.2.1 The Precautionary Principle

If there is uncertainty, and it is not possible, based on the information available, to confidently determine no significant effects on a site then the precautionary principle will be applied, and the plan will be subject to an appropriate assessment (HRA Stage 2).

2.2.2 Consultation

It is a requirement of the Habitat Regulations to consult the appropriate nature conservation statutory body (i.e. Natural Resources Wales/Natural England). No formal consultation with Natural Resources Wales/Natural England has been undertaken at this stage.

2.2.3 Mitigation, Avoidance and Protective Measures

Following the People over Wind & Sweetman v Coillte Teoranta Case C-323/17, the assessment does not consider protective, avoidance or mitigation measures for stage 1 Screening. These measures are carried forward and considered as part of the stage 2 Appropriate Assessment, if required.

3 European Sites

3.1 Introduction

As discussed in section 1.2, European sites in the UK collectively form the National Site Network. The objectives of the National Site Network are to:

a. maintain at, or where appropriate restore habitats and species listed in Annexes I and II of the Habitats Directive to a favourable conservation status in their natural range (so far as it lies in the United Kingdom's territory, and so far, as is proportionate).
b. contribute to ensuring, in their area of distribution, the survival and reproduction of wild birds listed in Annex I to the new Wild Birds Directive which naturally occur in the United Kingdom's territory and regularly occurring migratory species of birds not listed in that Annex which naturally occur in the United Kingdom's territory, and so securing compliance with the overarching aims of the Wild Birds Directive.

The National Site Network consists of:

- SACs - these are designated to protect those habitat types and species that are most in need of conservation (excluding birds).
- SPAs - these are designated to protect rare and vulnerable birds, and also regularly occurring migratory species.

Although not included in the legislation, as a matter of policy, Ramsar sites in England and Wales are protected in the same way as European sites, and therefore considered in the HRA process. The vast majority are also classified as SPAs and Sites of Special Scientific Interest (SSSIs). All SPAs and terrestrial SACs in England and Wales are also designated as SSSIs under the Wildlife and Countryside Act (1981) as amended.

For simplicity in this report, SACs, SPAs and Ramsar sites are collectively referred to as European sites.

3.2 European Sites in and Around Monmouthshire District

Best practice guidance suggests that sites occurring within a wider area of approximately 10km to 15km from the boundary of the area directly affected by a plan should be identified and assessed, in addition to those sites located within the plan area (Therivel, 2009). However, it is important to consider the possibility of impacts for any European site that might be affected, whatever its location, given the activities included in the plan and their range of influence. This may extend some distance from the area within the immediate influence of a plan.

There are nine SACs and one SPA located within Monmouth District. A further three SACs, are located within the 10km and/or 15km buffer surrounding Monmouthshire and have been deemed to be potentially within the influence of the Monmouthshire LFRMS. These sites are listed in Table 3-1 and shown in Figure 3-1.

Data on the European site interest features, their distribution, and their sensitivity to potential effects associated with the Monmouthshire LFRMS were obtained from various sources and reports, including the Joint Nature Conservation Committee (JNCC) and Natural Resources Wales and Natural England websites (citations, boundaries, management plans, site improvement plans etc). Information on these sites is provided in Table 3-2.

Table 3-1 European Designations in and around Monmouthshire District.

Designation	Within Monmouthshire District	Within the 10km and/or 15km buffer to Monmouth District and deemed to be within the influence of the LFRMS
SAC	Severn Estuary Wye Valley Woodlands Wye Valley & Forest of Dean Bat Sites River Wye Cwm Clydach woodlands River Usk Sugar Loaf Woodlands Usk Bat Sites Coed y Cerrig	Severn Estuary Wye Valley & Forest of Dean Bat Sites River Wye River Usk Usk Bat Sites Llangorse Lake Aberbargoed Grasslands Avon Gorge Woodlands
SPA	Severn Estuary	Severn Estuary
Ramsar	Severn Estuary	Severn Estuary

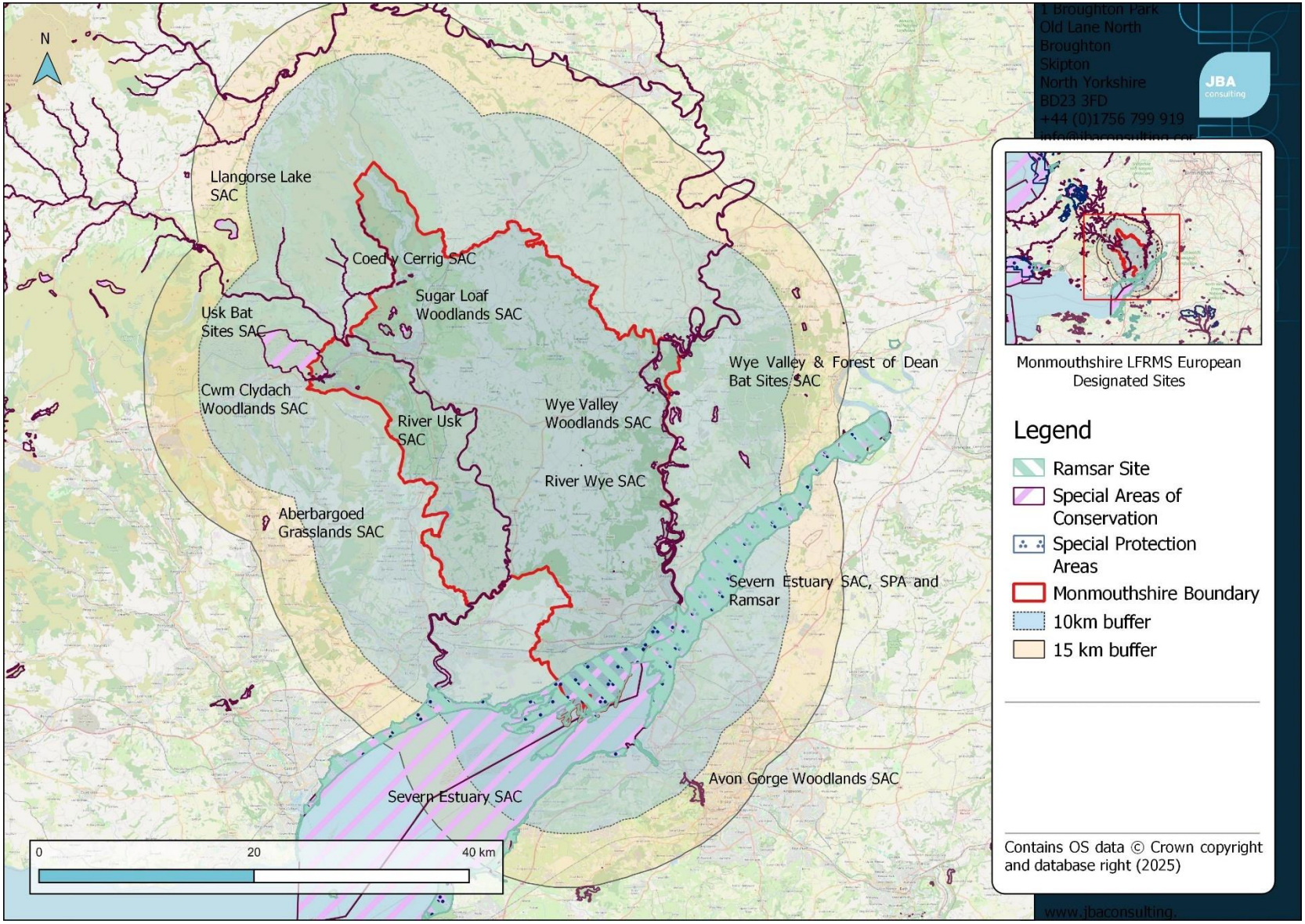

Figure 3—1: European Sites within a 10km and 15km boundary of the Monmouthshire LFRMS

Table 3-2: Details of European Sites within and adjacent to Monmouthshire County. Information from JNCC and Natural Resources Wales/Natural England

European Site	Qualifying Feature (Broad Habitat/Species Groupings)	Qualifying Feature	Site Vulnerability
Severn Estuary SAC UK0013030	Estuarine and intertidal habitats Submerged marine habitats Anadromous fish	**Annex I Habitats** 1130 Estuaries 1140 Mudflats and sandflats not covered by seawater at low tide 1330 Atlantic salt meadows (Glauco-Puccinellietalia maritimae) 1110 Sandbanks which are slightly covered by sea water all the time 1170 Reefs **Annex II Species** 1095 Sea Lamprey *Petromyzon marinus* 1099 River Lamprey *Lampetra fluviatilis* 1103 Twaite shad *Alosa fallax*	The site is vulnerable to: • Public access/disturbance • Physical modification • Impacts of development • Coastal squeeze • Change in land management • Changes in species distributions • Water pollution • Air pollution: impact of atmospheric nitrogen deposition • Marine consents and permits: minerals and waste • Fisheries: recreational marine and estuarine • Fisheries: commercial marine and estuarine • Invasive species • Marine litter • Marine pollution incidents

European Site	Qualifying Feature (Broad Habitat/Species Groupings)	Qualifying Feature	Site Vulnerability
Wye Valley Woodlands SAC UK0012727	Dry woodlands Mammals of wooded habitats	**Annex I Habitats** 9130 *Asperulo-Fagetum* beech forest 9180 *Tilio-Acerion* forests of slopes, screens and ravines 91J0 *Taxus baccata* woods of the British Isles **Annex II Species** 1303 Lesser Horseshoe bat *Rhinolophus hipposideros*	The site is vulnerable to: • Deer • Forestry and woodland management • Invasive species • Habitat connectivity • Species decline • Air pollution: impact of nitrogen deposition • Disease • Public access/disturbance
Wye Valley & Forest of Dean Bat Sites SAC UK0014794	Mammals of wooded habitats	**Annex II Species:** 1303 Lesser Horseshoe bat *Rhinolophus hipposideros* 1304 Greater Horseshoe bat *Rhinolophus ferrumequinum*	The site is vulnerable to: • Physical modification • Public access/disturbance Factors affecting the sites ecological character: • Habitat connectivity

European Site	Qualifying Feature (Broad Habitat/Species Groupings)	Qualifying Feature	Site Vulnerability
River Wye SAC UK0012642	Riverine habitats and running water Bogs and wet habitats (sensitive to acidification) Anadromous fish Non-migratory fish and invertebrates of rivers Mammals of riverine habitats	**Annex I Habitats:** 3260 Water courses of plain to montane levels with the Ranunculion fluitantis and Callitricho-Batrachion vegetation 7140 Transition mires and quaking bogs **Annex II Species:** 1092 White-clawed (or Atlantic stream) Crayfish *Austropotamobius pallipes* 1095 Sea lamprey *Petromyzon marinus* 1096 Brook lamprey *Lampetra planeri* 1099 River lamprey *Lampetra fluviatilis* 1103 Twaite shad *Alosa fallax* 1106 Atlantic salmon *Salmo salar* 1163 Bullhead *Cottus gobio* 1355 Otter *Luta lutra* 1102 Allis Shad *Alosa alosa*	The site is vulnerable to: • Water pollution • Physical modification • Invasive species • Hydrological changes • Forestry and woodland management • Fisheries: freshwater • Fisheries: fish stocking • Water abstraction • Public access/disturbance • Air pollution: impact of atmospheric nitrogen deposition • Inappropriate scrub control • Undergrazing • Transportation and service corridors

European Site	Qualifying Feature (Broad Habitat/Species Groupings)	Qualifying Feature	Site Vulnerability
Cwm Clydach Woodlands SAC UK0030127	Dry woodlands Mammals of wooded habitats	**Annex I Habitats:** 9130 Beech *Asperulo-Fagetum* forests 9120 Atlantic acidophilous beech forests with Ilex and sometimes also Taxus in the shrublayer (*Quercion robori-petraeae* or *Ilici-Fagenion*) **Annex I species:** 1303 Lesser horseshoe bat *Rhinolophus hipposideros*	Threats, pressures and activities with impacts on the site: F03 Hunting and collection of wild animals (terrestrial), including damage caused by game (excessive density), and taking/removal of terrestrial animals (including collection of insects, reptiles, amphibians, birds of prey, etc., trapping, poisoning, poaching, predator control, accidental capture (e.g. due to fishing gear), etc. inside I01 Invasive non-native species inside and outside

River Usk SAC UK0013007	Estuarine and intertidal habitats Riverine habitats and running water Dry woodlands Bogs and wet habitats Fens and wet habitats Anadromous fish Non-migratory fish and invertebrates of rivers Mammals of riverine habitats	**Annex I habitat:** 1130 Estuaries 1140 Mudflats and sandflats not covered by seawater at low tide 1330 Atlantic salt meadows *Glauco-Puccinellietalia maritimae* 3260 Water courses of plain to montane levels with the Ranunculion fluitantis and Callitricho-Batrachion vegetation 9130 *Asperulo-Fagetum* beech forests 9180 *Tilio-Acerion* forests of slopes, screes and ravines 91A0 Old sessile oak woods with Ilex and Blechnum in the British Isles 91D0 Bog woodland 91E0 Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior* (Alno-Padion, Alnion incanae, Salicion albae) **Annex II species:** 1102 Allis shad *Alosa alosa* 1103 Twait Shad *Alosa fallax* 1092 White-clawed Crayfish *Austropotamobius pallipes* 1163 Bullhead *Cottus gobio* 1099 River Lamprey *Lampetra fluviatilis* 1096 Brook Lamprey *Lampetra*	Threats, pressures and activities with impacts on the site: I01 Invasive non-native species inside and outside A04 Grazing inside B07 Forestry activities not referred to above inside and outside H01 Pollution to surface waters (limnic & terrestrial, marine & brackish) inside and outside H05 Soil pollution and solid waste (excluding discharges) outside J02 Human induced changes in hydraulic conditions inside B02 Forest and Plantation management & use inside and outside J03 Other ecosystem modifications inside

European Site	Qualifying Feature (Broad Habitat/Species Groupings)	Qualifying Feature	Site Vulnerability
		planeri 1355 Otter *Lutra lutra* 1029 Freshwater Pearl Mussel *Margaritifera margaritifera* 1095 Sea Lamprey *Petromyzon marinus* 1303 Lesser Horseshoe Bat *Rhinolophus hipposideros* 1106 Atlantic Salmon *Salmo salar*	
Sugar Loaf Woodlands SAC UK0030072	Dry woodlands	**Annex I habitats:** 9120 Atlantic acidophilous beech forests with Ilex and sometimes also Taxus in the shrublayer (Quercion robori-petraeae or Ilici-Fagenion 91A0 Old sessile oak woods with Ilex and Blechnum in the British Isles	Threats, pressures and activities with impacts on the site: A04 Grazing B01 Forest planting on open ground B07 Forestry activities not referred to above H04 Air pollution, air-borne pollutants I02 Problematic native species I01 Invasive non-native species B02 Forest and Plantation management & use

European Site	Qualifying Feature (Broad Habitat/Species Groupings)	Qualifying Feature	Site Vulnerability
Usk Bat Sites SAC UK0014784	Standing waters (not sensitive to acidification) Dry heathland habitats Bogs and wet habitats (sensitive to acidification) Riverine habitats and running water Fens and wet habitats (not sensitive to acidification) Upland Dry woodlands Mammals of wooded habitats	**Annex I habitats:** 3160 Natural dystrophic lakes and ponds 4030 European dry heaths 7110 Active raised bogs 7120 Degraded raised bogs still capable of natural regeneration 7130 Blanket bogs (* if active bog) 7220 Petrifying springs with tufa formation (Cratoneurion) 7230 Alkaline fens 8210 Calcareous rocky slopes with chasmophytic vegetation 8310 Caves not open to the public 9180 Tilio-Acerion forests of slopes, screes and ravines **Annex II species:** 1308 Barbastelle Bat *Barbastella barbastellus* 1323 Bechstein's Bat *Myotis bechsteinii* 1304 Greater Horsehoe Bat *Rhinolophus ferrumequinum* 1303 Lesser Horseshoe Bat *Rhinolophus hipposideros*	Threats, pressures and activities with impacts on the site: I02 Problematic native species I01 Invasive non-native species A04 Grazing J02 Human induced changes in hydraulic conditions E06 Other urbanisation, industrial and similar activities K04 Interspecific floral relations H04 Air pollution, air-borne pollutants

European Site	Qualifying Feature (Broad Habitat/Species Groupings)	Qualifying Feature	Site Vulnerability
Coed y Cerrig SAC UK0012766	Fens and wet habitats (not sensitive to acidification)	**Annex I habitat:** 91E0 Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior* (Alno-Padion, Alnion incanae, Salicion albae)	The main threats and pressures to the integrity of the site are: • Inadequate woodland management • Inappropriate grazing levels • Inappropriate hydrological regime • Atmospheric pollution • Recreational pressure

European Site	Qualifying Feature (Broad Habitat/Species Groupings)	Qualifying Feature	Site Vulnerability
Severn Estuary SPA UK9015022	Birds of lowland freshwaters and their margins Birds of coastal habitats Birds of estuarine habitats	Article 4 of Directive (2009/147/EC) A037 *Cygnus columbianus bewickii*; Bewick's swan (Non-breeding) A048 *Tadorna tadorna*; Common shelduck (Non-breeding) A051 *Anas strepera*; Gadwall (Non-breeding) A149 *Calidris alpina alpina;* Dunlin (Non-breeding) A162 *Tringa totanus*; Common redshank (Non-breeding) A394 *Anser albifrons albifrons*; Greater white-fronted goose (Non-breeding) Waterbird assemblage	The site is vulnerable to: • Public access/disturbance • Physical modification • Impacts of development • Coastal squeeze • Change in land management • Changes in species distributions • Water pollution • Air pollution: impact of atmospheric nitrogen deposition • Marine consents and permits: minerals and waste • Fisheries: recreational marine and estuarine • Fisheries: commercial marine and estuarine • Invasive species • Marine litter • Marine pollution incidents
Severn Estuary Ramsar	Estuarine and intertidal habitats Submerged marine habitats Anadromous fish Birds of lowland	Ramsar criterion 1: Due to immense tidal range, this affects both the physical environment and biological communities including the Annex I features present.	Factors affecting the sites ecological character: • Dredging • Erosion • Recreational/ tourism disturbance

European Site	Qualifying Feature (Broad Habitat/Species Groupings)	Qualifying Feature	Site Vulnerability
	freshwaters and their margins Birds of coastal habitats Birds of estuarine habitats	Ramsar criterion 3: Due to unusual estuarine communities, reduced diversity, and high productivity. Ramsar criterion 4: Important for the run of migratory fish between sea and river via estuary. Species include Salmon *Salmo salar*, Sea Trout *Salmo trutta*, Sea Lamprey *Petromyzon marinus*, River Lamprey *Lampetra fluviatilis*, Allis Shad *Alosa alosa*, Twaite Shad *Alosa fallax,* and Eel *Anguilla anguilla.* Ramsar criterion 5: Waterfowl assemblages of international importance. Ramsar criterion 6: Species/populations occurring at levels of international importance. Ramsar criterion 8: Extremely diverse range of fish species in the whole estuarine.	

European Site	Qualifying Feature (Broad Habitat/Species Groupings)	Qualifying Feature	Site Vulnerability
Llangorse Lake SAC UK0012985	Standing waters (not sensitive to acidification)	**Annex I habitat:** 3150 Natural eutrophic lakes with Magnopotamion or Hydrocharition - type vegetation	The main threats and pressures to the integrity of the SAC are: • Water quality • Sedimentation • Non-native invasive species • Loss of surrounding habitats
Aberbargoed Grasslands SAC UK0030071	Fens and wet habitats (not sensitive to acidification) Vascular plants lower plants and invertebrates of wet habitats	**Annex I habitats:** 6410 Molinia meadows on calcareous, peaty or clayey-silt-laden soils (Molinion caeruleae) **Annex II species:** 1065 Marsh fritillary butterfly Euphydryas (Eurodryas, Hypodryas) aurinia	The main threats and pressures to the integrity of the SAC are the following: • Appropriate grazing levels • Recreational pressure
Avon Gorge Woodlands SAC UK0012734	Dry woodlands Dry grassland	**Annex I habitats:** 9180 Tilio-Acerion forests of slopes, screes and ravines 6210 Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites)	The main threats and pressures to the integrity of the SAC are the following: • Invasive species • Undergrazing • Public access / disturbance • Disease • Changes in species distributions • Air pollution: Impact of atmospheric nitrogen deposition

3.3 Conservation Objectives

There are a number of designated sites that cross the border between England and Wales and therefore the conservation objectives provided by both Natural England and Natural Resources Wales have been used in this assessment.

3.3.1 Natural England Conservation Objectives

For the Severn Estuary SAC, River Wye SAC, Wye Valley and Forest of Dean Bat Sites SAC, Wye Valley Woodlands SAC and Avon Gorge Woodlands SAC the following Natural England conservation objectives apply:

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

For the Severn Estuary SPA the following Natural England conservation objectives apply:

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.

3.3.2 Natural Resources Wales Conservation Objectives

The conservation objectives set by Natural Resources Wales are detailed in the Core Management Plans for each of the designated sites. There is one conservation objective for each feature. Each conservation objective is a composite statement representing a site-specific description of what is considered to be the favourable conservation status of the feature and consists of a vision for the feature and a number of performance indicators.

Given the large number of sites and features being considered in this screening assessment, the conservation objectives have not been provided in this report but these have been reviewed and taken into account when completing the assessment.

4 Potential Hazards to European Sites

4.1 Introduction

Any strategy to manage flooding and the associated infrastructure upon which this strategy relies, can potentially have adverse impacts on the habitats and species for which European sites are designated. These impacts can be direct, such as habitat loss, fragmentation, or degradation, or indirect such as disturbance or pollution from construction, transportation etc.

This section identifies the potential hazards to European sites within and adjacent to Monmouthshire and then goes on to identify the types of hazards to which the qualifying features that are present within the sites are particularly sensitive.

4.2 Hazards to Sites

The European sites within and adjacent to Monmouthshire district include rivers and estuaries, and woodlands within the river valley and sites supporting important populations of bats, fish and invertebrates. Potential hazards to the interest features are identified in Table 4-1 below.

Table 4-1: Potential Hazards to the European Sites within and adjacent to the district.

Potential Hazard	Description
Change in water levels	Flooding, or altered water levels, may have adverse impacts on water dependent habitats and species. Additionally, changes to groundwater may adversely impact on these habitats.
Changes in hydrological regime	These are changes to existing hydrological processes (e.g. changes to flow rates) that may alter the present characteristics of the European sites.
Changes in water quality	Activities which may impact upon water quality, such as accidental pollution spills as a result of construction of flood defences that may adversely affect wetland and coastal habitats as well as species,such as Annex II species, Sea lamprey *Petromyzon marinus and River Lamprey Lampetra fluviatilis.*
Changes to surface water flooding	Activities which may result in a reduction or increase in the frequency and extent of surface water flooding which may affect riverine, floodplain and other habitats.
Competition from invasive non-native species	Flooding may cause introduction or spread of invasive non-native species, particularly

Potential Hazard	Description
	plants, which could result in changes to community composition and even to the complete loss of native communities.
Disturbance	Human activity (construction or other) can adversely impact on the qualifying features of the site directly (physical disturbance) or indirectly (visual or noise).
Habitat fragmentation	This is where flood events, or flood risk management measures such as defence construction, or alterations in coastal processes.
Habitat loss	This is a loss of habitat within the designated boundaries of a European site, for example as a result of defence construction.
Habitat/community simplification	Changes to environmental conditions that result in a reduction and fragmentation of habitats, reducing biodiversity.
Turbidity and siltation	Increases in turbidity within water environments can impact upon aquatic plants, fish and wildfowl due to sedimentation and reduction in penetrable light. This may arise from construction activities or changed flooding/hydrological regimes.
Pollution	Human activity (construction or other) can result in pollution of soils and or air. Pollution that typically affects habitat will include dust and particulate matter (PM), nitrogen oxides (NOx), ammonia (NH3) and sulphur dioxide (SO2).

4.2.1 Qualifying Features and Sensitivity to Hazards

Table 4-2 below, shows the qualifying features of the European sites within and adjacent to Monmouthshire LFRMS and identifies the hazards to which they are sensitive (see Table 4-1). It must be noted that during the assessment of the potential impacts of the Monmouthshire LFRMS on a European site, all of the potential hazards will be considered.

Table 4-2: Sensitivity of Qualifying Features to Potential Hazards

	Potential Hazards											
	Habitat loss	Habitat fragmentation	Changes in physical regime	Physical damage	Habitat/ community simplification	Disturbance (noise/ visual)	Competition from invasive non-native species	Changes in water levels or table	Changes in water quality	Changes to surface water flooding	Turbidity and siltation	Pollution
SAC/Ramsar Habitat Groups												
Estuarine and intertidal habitats	✓		✓	✓	✓		✓	✓	✓		✓	✓
Submerged marine habitats			✓						✓		✓	✓
Riverine habitats and running water	✓	✓	✓	✓	✓		✓	✓	✓	✓	✓	✓
Fens and wet habitats	✓	✓	✓	✓	✓		✓	✓	✓	✓	✓	✓
Bogs and wet habitats	✓	✓	✓	✓	✓		✓	✓	✓	✓	✓	✓
Dry woodland	✓			✓	✓		✓			✓		✓
Dry grassland	✓			✓	✓		✓			✓		✓

	Potential Hazards											
	Habitat loss	Habitat fragmentation	Changes in physical regime	Physical damage	Habitat/ community simplification	Disturbance (noise/ visual)	Competition from invasive non-native species	Changes in water levels or table	Changes in water quality	Changes to surface water flooding	Turbidity and siltation	Pollution
Dry heathland habitats	✓	✓		✓	✓		✓			✓		✓
Standing waters	✓		✓	✓	✓		✓	✓	✓	✓	✓	✓
Upland	✓			✓			✓			✓		✓
SAC/Ramsar Species Groups												
Vascular plants, lower plants and invertebrates of wet habitats	✓	✓	✓	✓	✓		✓	✓	✓	✓	✓	✓
Anadromous fish	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Non-migratory fish and invertebrates of rivers	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Mammals of riverine habitats	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Mammals of woodland habitats	✓	✓	✓	✓	✓	✓		✓	✓	✓	✓	✓
SPA/Ramsar Bird Species Groups												
Birds of lowland freshwaters and their margins	✓	✓	✓	✓	✓	✓		✓	✓	✓	✓	✓
Birds of coastal habitats	✓	✓	✓	✓	✓	✓		✓	✓	✓	✓	✓
Birds of estuarine habitats	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓

5 Screening Assessment

5.1 Introduction

Table 5-1 considers the objectives and actions of the Monmouthshire LFRMS and identifies whether they are likely to have significant effects on the integrity of the European Sites, either alone or in-combination with other plans and/or projects.

5.2 Assessment of likely significant effects

Table 5-1: Assessment of likely significant effects

LFRMS Objective	LFRMS Action	Potential Interest Feature Affected	Designated Sites Which include Interest Feature Affected	Potential Effect on European Sites	Likelihood of Significant In-Combination Effect
Objective 1: Reduce the risk and impact of flooding to people and property.	Provide an early warning system to allow residents time to move to a safe area. Encourage the residents to produce their own Flood Plan to reduce danger to themselves and damage to their property and its contents and provide advice and guidance on protection and resilience measures.	N/A	N/A	This action is a collation of flooding information and production of an emergency plan. This is a general statement for flooding procedures in areas locally vulnerable to flooding, thus leads to no impacts on the European Sites. ***No effect at all.***	No in-combination assessment required; zero effect alone or in-combination. ***No effect at all.***

LFRMS Objective	LFRMS Action	Potential Interest Feature Affected	Designated Sites Which include Interest Feature Affected	Potential Effect on European Sites	Likelihood of Significant In-Combination Effect
Objective 2: Reduce disruption to critical infrastructure and essential services resulting from flooding.	Monmouthshire County Council supports the response planning structure as adopted by the Gwent Local Resilience Forum (Gwent LRF) and ensures roles and responsibilities as agreed in joint plans are reflected in local authority emergency plans.	N/A	N/A	This action is to ensure the roles and responsibilities of emergency plans/responses are clearly set out. This leads to no effect on the European Sites. ***No effect at all.***	No in-combination assessment required; zero effect alone or in-combination. ***No effect at all.***

LFRMS Objective	LFRMS Action	Potential Interest Feature Affected	Designated Sites Which include Interest Feature Affected	Potential Effect on European Sites	Likelihood of Significant In-Combination Effect
Objective 3: Ensure a risk based and sustainable approach to investment and delivery of flood risk management activities	Providing habitats for wildlife and opportunities for biodiversity enhancement. New habitat can provide educational, recreational and community wellbeing benefits and supports the provision of new green infrastructure.	N/A	N/A	This is a general objective for the Monmouthshire LFRMS with no reference to location, type of work thus cannot impact any specific European Sites. ***No effect at all.***	No likely significant affects. ***No effect at all.***

LFRMS Objective	LFRMS Action	Potential Interest Feature Affected	Designated Sites Which include Interest Feature Affected	Potential Effect on European Sites	Likelihood of Significant In-Combination Effect
	Suggesting how water services infrastructure can contribute to sustainable development in terms of increased water efficiency and reduced water consumption in new developments. There are obligations on the Planning process to consider sustainability. Dŵr Cymru/Welsh Water input will also be required as part of the dialogue between all parties.	N/A	N/A	This is a general objective / compliance with Dŵr Cymru/Welsh Water input for the Monmouthshire LFRMS with no reference to location, type of work thus cannot impact any specific European Sites. ***No effect at all.***	No in-combination assessment required; zero effect alone or in-combination. ***No effect at all.***
Objective 4: Ensure flood resilience at environmentally	Identifying the impact of development relating to water	N/A	N/A	This objective aims to protect sites designated for nature	No in-combination assessment required; zero effect alone or in-

LFRMS Objective	LFRMS Action	Potential Interest Feature Affected	Designated Sites Which include Interest Feature Affected	Potential Effect on European Sites	Likelihood of Significant In-Combination Effect
significant and sensitive sites of national, regional and local importance is maintained and enhanced where possible.	quality, nature conservation areas and protected species, then suggesting possible avoidance, mitigation or compensation measures where required. The SEA as part of the LFRM Strategy covers this.			conservation from the harmful effects of flooding through maintaining and enhancing flood resilience. This will not result in adverse effects on European sites. ***No effect at all.***	combination. ***No effect at all.***

LFRMS Objective	LFRMS Action	Potential Interest Feature Affected	Designated Sites Which include Interest Feature Affected	Potential Effect on European Sites	Likelihood of Significant In-Combination Effect
Objective 5: Support the Water Framework Directive by preventing deterioration of watercourses and improve water quality	Reducing pollutant concentration in stormwater, thus protecting the quality of the receiving water body. Encourage natural groundwater recharge to minimise the impact on aquifers and river base flows in the receiving catchment.	N/A	N/A	This is a positive implementation of management to reduce risk of pollution and support the WFD. No adverse effects anticipated on the European Sites. ***No effect at all.***	No in-combination assessment required; zero effect alone or in-combination. ***No effect at all***.
Objective 6: Continue to improve understanding of flood risk and the impact of climate change within Monmouthshire	Strengthen policy on other sources of flooding through the emerging Local Plan for Monmouthshire.	N/A	N/A	This is a general statement of policy to improve understanding of flood risk, with no reference to location, type of work or timeframe, so in itself cannot lead to any impacts on any	No in-combination assessment required; zero effect alone or in-combination. ***No effect at all.***

LFRMS Objective	LFRMS Action	Potential Interest Feature Affected	Designated Sites Which include Interest Feature Affected	Potential Effect on European Sites	Likelihood of Significant In-Combination Effect
				European Sites. ***No effect at all.***	
Objective 7: Raise awareness of flood risk amongst individuals and communities and support them to prepare for, respond to and recover from flood events	Compile and update all local models to ensure compatibility with local communities.	N/A	N/A	This action is a data collection, updating and mapping measure with no potential to impact on European sites. ***No effect at all.***	No in-combination assessment required; zero effect alone or in-combination. ***No effect at all.***
Objective 8: Work collaboratively with other Risk Management Authorities and organisations to effectively manage flood risk	N/A	N/A	N/A	This is a general statement of policy with regards to collaborative working, with no reference to location, type of work or timeframe, so in itself cannot lead to any impacts on any European Sites.	No in-combination assessment required; zero effect alone or in-combination. ***No effect at all.***

LFRMS Objective	LFRMS Action	Potential Interest Feature Affected	Designated Sites Which include Interest Feature Affected	Potential Effect on European Sites	Likelihood of Significant In-Combination Effect
				No effect at all.	

5.3 Summary of the assessment of likely significant effects

Table 4-1 outlines the objectives and actions of the Monmouthshire LFRMS. These objectives are all high-level actions and aspirations that do not lead to activities which could have an effect on European Sites and as no effects have been identified alone. As no effects were identified alone, no in-combination assessment is required.

6 Screening Conclusion

The Monmouthshire LFRMS sets out the overall objectives to manage flooding within Monmouthshire District. The Screening Assessment did not identify any effects arising from the Monmouthshire LFRMS proposed objectives on the European Sites. This is largely due to the high-level nature and general aspirations of the LFRMS as well as the dual purpose of achieving environmental protection and gain. If any further actions and/or projects such as capital flood management/alleviation schemes are to arise in the future from the strategy, further assessment would be required.

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