

## 3 Approach to HRA

- 3.1 This chapter describes the approach that will be taken to the HRA of the GCLP throughout its development including the specific tasks that will be undertaken and the assumptions that will underpin the HRA judgements made.

### Scoping

- 3.2 For many of the types of impacts, screening for likely significant effects will be determined on a proximity basis, using GIS data to determine the proximity of potential development locations to the European sites that are the subject of the assessment. However, there are many uncertainties associated with using set distances as there are very few standards available as a guide to how far impacts will travel. Therefore, the following section applies a number of precautionary assumptions to enable specific impacts on European Sites to be either scoped in or out of the subsequent HRA screening.

### Physical damage and loss

- 3.3 Any development resulting from the GCLP would take place within Greater Cambridge; therefore only European sites within the boundary could be affected direct by physical damage or loss of habitat within the site boundaries. Eversden and Wimpole Woods SAC is the only site located within Greater Cambridge and therefore with the potential to be directly affected by physical damage and/or loss from development.
- 3.4 Habitat loss from development in areas outside of the European site boundaries may also result in likely significant effects where that habitat contributes towards maintaining the interest feature for which the European site is designated. This includes land which may provide offsite movement corridors or feeding and sheltering habitat for mobile species such as bats, birds and fish.
- 3.5 With regards to bird, Natural England has advised that their recognised distance for the consideration of offsite functionally linked land is generally 2km, but for certain species, including most notably golden plover and lapwing, a greater distance of 15km may be appropriate. The Ouse Washes SPA and Ramsar sites are located immediately adjacent to the north of Greater Cambridge and support wetland bird species with potential to be affected by indirect physical damage and/or loss to offsite habitat, and therefore the potential for physical damage and loss of habitat to affect functionally linked land will require assessment within the HRA.
- 3.6 The Ouse Washes SAC is designated for supporting populations of spined loach. This species occur patchily in a variety of waterbodies, including small streams, large rivers and both large and small drainage ditches. Whilst it appears to have limited means of dispersal, potentially suitable waterbodies within Greater Cambridge share direct hydrological connectivity with the Ouse Washes SAC, and therefore the potential for physical damage and loss of habitat to affect functionally

linked land upon which this species may depend will require assessment within the HRA

- 3.7 Important foraging areas for the barbastelle bat, which is the qualifying feature of the Eversden and Wimpole Woods SAC, are likely to be focused within 8km of their core breeding zones. Development as a result of the GCLP will include areas located within 8km of Eversden and Wimpole Woods SAC, and therefore the potential for physical damage and loss of habitat to affect functionally linked land upon which the SAC qualifying feature depends will require assessment within the HRA.
- 3.8 Other sites have been scoped out from further assessment on the basis of distance from Greater Cambridge and/or because their qualifying features are unlikely to be dependent upon habitats occurring within the Greater Cambridge area.
- 3.9 **Therefore, the potential for likely significant effects as a result of physical damage and loss needs to be considered in relation to Ouse Washes SAC, SPA and Ramsar sites, and Eversden and Wimpole Woods SAC.**

### Non-physical disturbance

- 3.10 Noise and vibration effects, e.g. during the construction of new housing or employment development, are most likely to disturb bird and bat species and are thus a key consideration with respect to European sites where these species are the qualifying features. Artificial lighting at night (e.g. from street lamps, flood lighting and security lights) has the potential to affect species where it occurs in close proximity to key habitat areas, such as key roosting sites of SPA birds and movement or feeding areas of bats.
- 3.11 It has been assumed that the effects of noise, vibration and light are most likely to be significant within a distance of 500 metres. There is also evidence of 300 metres being used as a distance up to which certain bird species can be disturbed by the effects of noise<sup>18</sup>; however, it has been assumed (on a precautionary basis) that the effects of noise, vibration and light pollution are capable of causing an adverse effect if development takes place within 500 metres of a European site with qualifying features sensitive to these disturbances. Scoped in European sites that support qualifying species which are therefore vulnerable to non-physical disturbance are Ouse Washes SPA and Ramsar sites, and Eversden and Wimpole Woods SAC.
- 3.12 All other European sites were scoped out of the assessment because they occur over 500 metres from the Greater Cambridge boundary.
- 3.13 **Therefore, the potential for likely significant effects as a result of non-physical disturbance needs to be considered in relation to Ouse Washes SPA and Ramsar sites, and Eversden and Wimpole Woods SAC.**

### Non-toxic contamination

- 3.14 Habitats can be subject to non-toxic contamination, such as nutrient enrichment, changes in salinity and smothering from dust, due to industrial action, agriculture, construction and water abstraction and discharge. European sites with potential to be affected by non-toxic contamination are likely to be those sites that lie within close proximity, or those that are hydrologically connected to areas of development

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<sup>18</sup> British Wildlife Magazine. October 2007

provided for by the plan but potential changes to water quantity and quality are considered separately below.

- 3.15 Ouse Washes SAC, SPA and Ramsar sites, and Eversden and Wimpole Woods SAC lie within or adjacent to Greater Cambridge and have potential to be susceptible to impacts from non-toxic contamination. Due to the distance, all other European sites have been scoped out of the assessment.
- 3.16 **Therefore, the potential for likely significant effects of non-toxic contamination needs to be considered in relation to Ouse Washes SAC, SPA and Ramsar sites, and Eversden and Wimpole Woods SAC.**

### Air pollution

- 3.17 Air pollution is most likely to affect European sites where plant, soil and water habitats are the qualifying features, but some qualifying animal species may also be affected, either directly or indirectly, by deterioration in habitat as a result of air pollution. Deposition of pollutants to the ground and vegetation can alter the characteristics of the soil, affecting the pH and nitrogen levels, which can then affect plant health, productivity and species composition.
- 3.18 In terms of vehicle traffic, nitrogen oxides (NO<sub>x</sub>, i.e. NO and NO<sub>2</sub>) are considered to be the key pollutants. Deposition of nitrogen compounds may lead to both soil and freshwater acidification, and NO<sub>x</sub> can cause eutrophication of soils and water.
- 3.19 Based on the Highways Agency Design Manual for Road and Bridges (DMRB) Manual Volume 11, Section 3, Part 114 (which was produced to provide advice regarding the design, assessment and operation of trunk roads including motorways), it is assumed that air pollution from roads is unlikely to be significant beyond 200m from the road itself. Where increases in traffic volumes are forecast, this 200m buffer needs to be applied to the relevant roads in order to make a judgement about the likely geographical extent of air pollution impacts.
- 3.20 The DMRB Guidance for the assessment of local air quality in relation to highways developments provides criteria that should be applied at the Screening Stage of an assessment of a plan or project, to ascertain whether there are likely to be significant impacts associated with routes or corridors. Based on the DMRB guidance, affected roads which should be assessed are those where:
- Daily traffic flows will change by 1,000 AADT (Annual Average Daily Traffic) or more; or
  - Heavy duty vehicle (HDV) flows will change by 200 AADT or more; or
  - Daily average speed will change by 10 km/hr or more; or
  - Peak hour speed will change by 20 km/hr or more; or
  - Road alignment will change by 5 m or more.
- 3.21 Where significant increases in traffic are possible on roads within 200m of European sites, traffic forecast data may be needed to determine if increases in vehicle traffic are likely to be significant. In line with the Wealden judgment<sup>19</sup>, the traffic growth considered by the HRA should be based on the effects of development provided for by the Plan in combination with other drivers of growth such as development proposed in neighbouring districts and demographic change.

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<sup>19</sup> Wealden v SSCLG [2017] EWHC 351 (Admin)

- 3.22 It has been assumed that only those roads forming part of the primary road network (motorways and 'A' roads) are likely to experience any significant increases in vehicle traffic as a result of development (i.e. greater than 1,000 AADT). As such, where a site is within 200m of only minor roads, no significant effect from traffic-related air pollution is considered to be the likely outcome.
- 3.23 The key commuting corridor for new housing and employment development will likely include the M11, A10, A11, A14, A142, A428, A603 and A1307, which are highlighted in **Figure 3.1** in **Appendix 4**. European sites within 15km of the Greater Cambridge boundary and also within 200m of a strategic road include Devils Dyke SAC (A14), Ouse Washes SAC, SPA and Ramsar (A1123 and A142), and Portholme SAC (A14).
- 3.24 In addition to this, it was advised by Natural England that "*the HRA should provide sufficient evidence to demonstrate that there is no credible risk of air pollution beyond the 200m threshold that could potentially result in an adverse effect to*" Wicken Fen Ramsar, Chippenham Fen Ramsar and Fenland SAC. In line with a precautionary approach, these European sites were considered further in relation to air pollution.
- 3.25 All other sites were situated over 200m from a strategic road and were therefore scoped out.
- 3.26 **Therefore, likely significant effects relating to increased air pollution need to be considered in relation to Devils Dyke SAC, Ouse Washes SAC, SPA and Ramsar, Portholme SAC, Wicken Fen Ramsar, Chippenham Fen Ramsar and Fenland SAC.**

### Recreation

- 3.27 Recreational activities and human presence can result in significant effects on European sites as a result of erosion and trampling, associated impacts such as fire and vandalism or disturbance to sensitive features, such as birds through both terrestrial and water-based forms of recreation.
- 3.28 The GCLP will result in housing growth, and associated population increase within Greater Cambridge. Where increases in population are likely to result in significant increases in recreation at a European site, either alone or in-combination, the potential for likely significant effects will require assessment. At this stage, there is no definitive figure of the number and location of dwellings the GCLP will make provision for over the plan period.
- 3.29 European sites with qualifying bird species are likely to be particularly susceptible to recreational disturbances from walking, dog walking, angling, illegal use of off-road vehicles and motorbikes, wildfowling, and water sports. An increase in recreational pressure from development therefore has the potential to disturb bird populations of SPA and Ramsar sites as a result of both terrestrial and water-based recreation.
- 3.30 In addition, recreation can physically damage habitat as a result of trampling and also through erosion associated with boat wash and terrestrial activities such as use of vehicles.
- 3.31 Following advice provided by Natural England on an earlier draft of this Scoping Report, a 'zone of potential risk' for recreational pressure of 2km and 5km, which has been derived from the Impact Risk Zones (IRZ), has been applied to inform initial impacts to recreation on European sites. IRZs have been developed by

Natural England as a tool to define zones of key sensitivities, including recreational pressure to SSSIs from proposed development. Given the overlap between SSSI and European sites, this zone of potential influence can therefore be used to appropriately identify the potential risks to European sites from the Local Plan in this assessment. **Table 3.1** below outlines the zones of potential of risk for each European site, which are considered to be at a significant risk from recreational pressure.

**Table 3.1 Cambridgeshire Recreational Pressure IRZ Component SSSIs**

SSSI	Zone of Potential Risk: Higher (H) or Lower (L)
Eversden and Wimpole Woods SAC	H – 5km
Ouse Washes SAC, SPA and Ramsar	L – 2km
Portholme SAC	H – 5km
Devil’s Dyke SAC	H – 5km

- 3.32 All other SSSIs (including overlapping European sites) within Cambridgeshire were not considered be at significant risk from recreational pressure and therefore have not been given a zone of potential risk. However, to ensure that a precautionary approach is taken, this assessment has applied a 5km zone of potential risk to all remaining European sites within 15km of Greater Cambridge.
- 3.33 More specific Zones of Influence (ZOI) may be defined following targeted visitor surveys and discussions with land managers, such as National Trust at Wicken Fen Ramsar, as it is not always appropriate to apply a generic ZOI. It may also for example be possible to extrapolate appropriate ZOIs from studies and approaches used for similarly comparable sites elsewhere in the UK.
- 3.34 This approach is precautionary and broadly consistent with the approach that was established for the Thames Basin Heath Delivery Framework, which identified a ZOI of 7km from the European site.
- 3.35 A review of the European sites in Greater Cambridge and within 15km from the boundary identified the following European sites within 5km of the district boundary:
- Eversden and Wimpole Woods SAC
  - Ouse Washes SAC
  - Portholme SAC
  - Fenland SAC
  - Ouse Washes SPA
  - Ouse Washes Ramsar
  - Wicken Fen Ramsar
- 3.36 On the basis of the above, Devils Dyke SAC and Chippenham Fen Ramsar have been scoped out of the assessment from significant recreational effects because they are located over 5km from Greater Cambridge.

- 3.37 **Therefore, the potential for likely significant effects needs to be assessed in relation to Eversden and Wimpole Woods SAC, Ouse Washes SAC, Portholme SAC, Fenland SAC, Ouse Washes SPA, Ouse Washes Ramsar, and Wicken Fen Ramsar.**

### Water quantity and quality

- 3.38 An increase in demand for water abstraction and treatment resulting from the growth proposed in the Strategic Plan could result in changes in hydrology at European sites. Depending on the qualifying features and particular vulnerabilities of the European sites, this could result in likely significant effects; for example, due to changes in environmental or biotic conditions, water chemistry and the extent and distribution of preferred habitat conditions. To fully understand the potential impacts of proposed development on European sites a review of relevant Water Cycle Studies (WCS) and liaison with the Environment Agency and relevant water companies will be required.
- 3.39 Portholme SAC, Ouse Washes SAC, SPA and Ramsar, Fenland SAC, Devils Dyke SAC and Wicken Fen Ramsar are hydrologically linked to waterbodies in Greater Cambridge, so at this stage hydrological connectivity or a reliance on water resources connected with the European sites cannot be ruled out. Changes in water quantity and quality through increased demand for water supply and increased wastewater discharges is therefore considered likely to be a key issue for these sites.
- 3.40 In addition to this, it was advised that the HRA *'demonstrate the lack of hydrological connectivity between water resources which could be affected as a result of the GCLP and Chippenham Fen.'* In line with a precautionary approach, this European site was considered further in relation to air pollution.
- 3.41 Eversden and Wimpole Woods SAC was scoped out because the qualifying features were not considered susceptible to changes in water quantity and quality and because there was a lack of hydrological connectivity to water resources which could be affected as a result of the GCLP.
- 3.42 Following consultation from the Environment Agency (EA) of the Sustainability Appraisal Scoping Report, it was highlighted that phosphates and nitrates arising from growth and development and those from agriculture *"will be a significant issue in the HRA to consider the in-combination effects of development in other plan areas (duty to cooperate) and other pollutant sources including nitrates from air pollution"*. In-combination impacts from water quantity and quality will be considered in detail at the screening stage.
- 3.43 **Therefore, likely significant effects relating to changes in water quality and quantity need to be considered in relation to Portholme SAC, Ouse Washes SAC, SPA and Ramsar, Devils Dyke SAC, Fenland SAC, Wicken Fen Ramsar and Chippenham Fen Ramsar.**

### Summary of Scoping

- 3.44 **Table 3.1** below summarises the results of scoping and identifies those potential impacts on European sites which will require further consideration at the HRA Screening stage or can be scoped out from further assessment. Where certain



types of effects are scoped out in **Table 3.1** they do not need to be considered further.

**Table 3.2 Summary of Scoping Assumptions**

	Physical damage/ loss of habitat	Non-physical disturbance	Non-toxic contamination	Air pollution	Recreation pressure	Water quantity and quality
Eversden and Wimpole Woods SAC	Scoped in	Scoped in	Scoped in	Scoped out	Scoped in	Scoped out
Ouse Washes SAC	Scoped in	Scoped out	Scoped in	Scoped in	Scoped in	Scoped in
Portholme SAC	Scoped out	Scoped out	Scoped out	Scoped in	Scoped in	Scoped in
Devils Dyke SAC	Scoped out	Scoped out	Scoped out	Scoped in	Scoped out	Scoped in
Fenland SAC	Scoped out	Scoped out	Scoped out	Scoped in	Scoped in	Scoped in
Ouse Washes SPA	Scoped in	Scoped in	Scoped in	Scoped in	Scoped in	Scoped in
Ouse Washes Ramsar	Scoped in	Scoped in	Scoped in	Scoped in	Scoped in	Scoped in
Wicken Fen Ramsar	Scoped out	Scoped out	Scoped out	Scoped in	Scoped in	Scoped in
Chippenham Fen Ramsar	Scoped out	Scoped out	Scoped out	Scoped in	Scoped out	Scoped in

### Stage 1: Screening Methodology

- 3.45 As required under Regulation 105 of The Conservation of Habitats and Species Regulations 2017 (the 'Habitats Regulations'), an assessment will be undertaken of the 'likely significant effects' of the Plan. The assessment will be prepared in order

to identify which policies or site allocations would be likely to have a significant effect on European sites. The screening assessment will be conducted without taking pre-embedded mitigation into account, in accordance with the 'People over Wind' judgment.

- 3.46 Consideration will be given to the potential for the development proposed to result in significant effects associated with:
- Physical loss of/damage to habitat;
  - Non-physical disturbance (noise, vibration and light);
  - Non-toxic contamination;
  - Air pollution;
  - Recreation pressure; and
  - Changes to hydrology including water quality and quantity.
- 3.47 This approach will also allow for consideration to be given to the cumulative effects of the site allocations rather than focussing exclusively on individual developments provided for by the GCLP.
- 3.48 A risk-based approach involving the application of the precautionary principle will be adopted in the assessment, such that a conclusion of 'no significant effect' will only be reached where it is considered very unlikely, based on current knowledge and the information available, that a proposal in the GCLP would have a significant effect on the integrity of a European site.
- 3.49 The below section identifies assumptions that have been applied at this early Scoping Stage to enable specific impacts on European sites to either be scoped in or out of subsequent

#### Interpretation of 'likely significant effect'

- 3.50 Relevant case law helps to interpret when effects should be considered as being likely to result in a significant effect, when carrying out a HRA of a plan.
- 3.51 In the Waddenzee case<sup>20</sup>, the European Court of Justice ruled on the interpretation of Article 6(3) of the Habitats Directive (translated into Reg. 102 in the Habitats Regulations), including that:
- An effect should be considered 'likely', "if it cannot be excluded, on the basis of objective information, that it will have a significant effect on the site" (para 44).
  - An effect should be considered 'significant', "if it undermines the conservation objectives" (para 48).
- 3.52 Where a plan or project has an effect on a site "but is not likely to undermine its conservation objectives, it cannot be considered likely to have a significant effect on the site concerned" (para 47).
- 3.53 An opinion delivered to the Court of Justice of the European Union<sup>21</sup> commented that:

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<sup>20</sup> European Court of Justice in Case C-127/02 Landelijke Vereniging tot Behoud van de Waddenzee



- 3.54 “The requirement that an effect in question be ‘significant’ exists in order to lay down a de minimis threshold. Plans or projects that have no appreciable effect on the site are thereby excluded. If all plans or projects capable of having any effect whatsoever on the site were to be caught by Article 6(3), activities on or near the site would risk being impossible by reason of legislative overkill.”
- 3.55 This opinion (the ‘Sweetman’ case) therefore allows for the authorisation of plans and projects whose possible effects, alone or in combination, can be considered ‘trivial’ or de minimis; referring to such cases as those “which have no appreciable effect on the site”. In practice such effects could be screened out as having no likely significant effect; they would be ‘insignificant’.

### In-combination effects

- 3.56 Regulation 102 of the Amended Habitats Regulations 2017 requires an Appropriate Assessment where “a land use plan is likely to have a significant effect on a European site (either alone or in combination with other plans or projects) and is not directly connected with or necessary to the management of the site”. Therefore, it will be necessary to consider whether any impacts identified from the GCLP may combine with other plans or projects to give rise to significant effects in combination.
- 3.57 This exercise will be carried out as part of the screening stage of the HRA. The potential for in-combination effects will only be considered for those Plan components identified as unlikely to have a significant effect alone, but which could act in combination with other plans and projects to produce a significant effect. This approach accords with recent guidance on HRA.
- 3.58 The first stage in identifying ‘in-combination’ effects involves identifying which other plans and projects in addition to the GCLP may affect the European sites that will be the focus of this assessment. This exercise will seek to identify those components of nearby plans that could have an impact on the European sites considered as part of this HRA, e.g. areas or towns where additional housing or employment development is proposed near to the same European sites (as there could be effects from the transport, water use, infrastructure and recreation pressures associated with the new developments).
- 3.59 There are a large number of potentially relevant plans; therefore the review will focus on planned spatial growth within authorities adjacent to Greater Cambridge. The findings of any associated HRA work for those plans will be reviewed where available. With help from the Councils, any strategic projects in the area that could have in-combination effects with the GCLP will also be identified and reviewed, if applicable.
- 3.60 Should any other plans or projects be identified throughout the HRA process that could lead to in-combination effects on European sites with the GCLP, they will be included in the review.
- 3.61 The HRA Screening will identify and review other plans and projects for consideration of in-combination effects, and will outline the components of each plan or project that could have an impact on nearby European sites and considering the findings of the accompanying HRA work (where available). This information will be

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<sup>21</sup> Advocate General’s Opinion to CJEU in Case C-258/11 Sweetman and others v An Bord Pleanala 22nd Nov 2012.

updated as the HRA work for the GCLP progresses. The local plans and associated HRAs of the following authorities will be included as a minimum:

- Huntingdonshire
- Fenland
- East Cambridgeshire
- Forest Heath
- St Edmundsbury
- Braintree
- Uttlesford
- East Hertfordshire
- North Hertfordshire
- Central Bedfordshire
- Bedford
- Stevenage

3.62 In addition, the following key plans will be included as they are developed further:

- The Oxford-Cambridge Arc
- Cambridgeshire and Peterborough Minerals and Waste Local Plan
- Cambridgeshire and Peterborough Strategic Spatial Framework
- Cambridgeshire Local Transport Plan

3.63 The Government's National Infrastructure Planning website<sup>22</sup> will also be reviewed for major projects that could have significant effects in combination with those of the GCLP.

### Stage 2: Appropriate Assessment Methodology

3.64 Should it not be possible at the screening stage to conclude that there will be no significant effects on European sites as a result of the GCLP, it will be necessary to undertake an Appropriate Assessment.

3.65 The Appropriate Assessment stage of the HRA focuses on those impacts judged likely at the screening stage to have a significant effect, and seeks to conclude whether they would result in an adverse effect on the on the integrity of the qualifying features of a European site(s), or where insufficient certainty regarding this remains. The integrity of a site depends on the site being able to sustain its 'qualifying features' across the whole of the site and ensure their continued viability.

3.66 An Appropriate Assessment will be prepared for each of those European sites where significant effects from the GCLP could not be ruled out. The Appropriate Assessment would set out each European site's qualifying features and conservation objectives, standards and factors which are needed to maintain the site's integrity, existing trends and pressures at the site including the use of areas of

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<sup>22</sup> <https://infrastructure.planninginspectorate.gov.uk/projects/south-east/>

off-site functional land (where data are available), as well as the conservation objectives, and the site vulnerabilities identified during the screening stage. For each European site and likely significant effect identified we would aim to distinguish between direct and indirect effects, short or long term effects, construction, operational or decommissioning effects, isolated, interactive or cumulative effects and permanent, intermittent or temporary effects. The impacts will vary, depending on the habitat or species in question for each site.

3.67 As stated in HRA Guidance<sup>23</sup>, assessing the effects on the site(s) integrity involves considering whether the predicted impacts of the plan policies and site allocations (either alone or in combination) have the potential to:

- Cause delays to achieving the conservation objectives of the site.
- Interrupt progress towards achieving the conservation objectives of the site.
- Disrupt those factors that help to maintain favourable condition of the site.
- Interfere with the balance, distribution and density of key species that are the indicators of favourable condition of the site.
- Cause changes to the vital defining aspects (e.g. nutrient balance) that determine how the site functions as a habitat or ecosystem.
- Change the dynamics of relationships that define the structure or function of the site (e.g. Relationships between soil and water, or animals and plants).
- Interfere with anticipated natural changes to the site.
- Reduce the extent of key habitats or the population of key species.
- Reduce the diversity of the site.
- Result in disturbance that could affect the population, density or balance between key species.
- Result in fragmentation.
- Result in the loss of key features

3.68 The latest available data sources will be drawn on to inform the Appropriate Assessment. The results of this analysis should enable a conclusion to be reached regarding whether the integrity of any European site would be affected. If this were the case, an assessment of alternative solutions or the provision of avoidance and mitigation measures which would avoid adverse effects on integrity would be undertaken. In the context of the GCLP, such measures may include the clarification of policies to remove areas of uncertainty leading to predicted impacts or to include avoidance and mitigation measures such as conditions or restrictions relating to their implementation, the modification of policies to include alternative solutions or locations for particular developments or the omission of policies where no alternatives exist.

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<sup>23</sup> *Assessment of plans and projects significantly affecting European sites. Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC.* European Commission Environment DG, November 2001.

### Stage 3: Assessment where no alternatives exist

- 3.69 If adverse effects on the integrity of a European site cannot be ruled out the plan would not be able to proceed in its current form unless IROPI could be demonstrated. At this stage, we consider it unlikely that the GCLP would need to demonstrate IROPI because the plan should, as part of the iterative process of HRA, seek to avoid or mitigate potential adverse effects in the first instance, and therefore this has not been discussed in this document.