

**Habitat Regulations Assessment of the Plymouth City Council
North Plymstock Area Action Plan**

Screening Report

March 2007

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1. Introduction

This document has been produced to determine whether policies and proposals of Plymouth City Council's (PCC) Local Development Framework (LDF) Area Action Plan (AAP) for North Plymstock will have a significant adverse impact on nearby Natura 2000 sites.

1.1 Background

The Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Flora and Fauna – the 'Habitats Directive' provides legal protection for habitats and species of European importance. Article 2 of the Directive requires the maintenance or restoration of habitats and species of interest to the EU in a favourable condition. This is implemented through a network of protected areas referred to as Natura 2000 sites.

Articles 6(3) and 6(4) of the Habitats Directive requires Appropriate Assessment of plans and projects likely to have a significant effect on a European site. This means that the effects of such plans/projects on Natura 2000 sites need to be assessed to ensure that the integrity of these sites is maintained. The North Plymstock Area Action Plan is such a plan.

The Natura 2000 sites are of two types – Special Area of Conservation (SAC) and Special Protection Areas (SPA). SAC's stem from the Habitats Directive, and are mainly habitat features, whereas SPA's are features comprising populations of bird species. Each Natura 2000 site has a number of qualifying features, for which conservation objectives have been developed.

The purpose of a Habitat Regulations Assessment (HRA) is to assess the impacts of a land-use plan against the conservation objectives of the Natura 2000 Site. The assessment must determine whether the plan would adversely affect the integrity of the site in terms of its nature conservation objectives. Where negative effects are identified other options should be examined to avoid any potential damaging effects.

The Habitats Directive applies the precautionary principle to SPA's and SAC's. Plans can only be permitted having ascertained that there will be no adverse effect on the integrity of the site(s) in question. Plans may still be permitted if there are no alternatives to them and there are imperative reasons of overriding public interest as to why they should go ahead. Previous rulings show that these cases are rare. In such cases, compensation will be necessary to ensure the overall integrity of the site network.

The requirement to undertake HRA of these plans was clarified at the national level in March 2006. This was after PCC had published its North Plymstock AAP Preferred Options document and timescales were too short to complete HRA prior to the publication of the submission stage document in July 2006. It is intended that this HRA will be used to identify any necessary changes (in the form of alternatives or mitigation) to the AAP in advance of the hearing in March 2007.

The HRA for Plymouth's LDF Core Strategy was completed in early February 2007. This identified a number of necessary avoidance measures required to manage impacts associated with the Core Strategy and identified a number of suggested changes to the document that will be incorporated before it is adopted. A summary of the conclusions from Core Strategy Habitat Regulation Assessment is include in Appendix 1. Consideration of the potential for the North Plymstock AAP to have a significant effect will be made in the light of this existing work.

1.2 Methodology used for this Habitat Regulations Assessment

DCLG (2006) guidance on Planning for the Protection of European Sites: Appropriate Assessment (consultation document) recommends a 3 stage process:

1. Screening. Determining whether the plan 'either alone or in combination with other plans or projects ' is likely to have a significant effect on a European site

2. Appropriate Assessment. Determining whether, in view of the site's conservation objectives, the plan 'either alone or in combination with other plans or projects ' would have an adverse effect (or risk of this) on the integrity of the site. If not, the plan can proceed.

3. Mitigation & Alternatives. Where the plan is assessed as having an adverse effect (or risk of this) on the integrity of a site, there should be an examination of mitigation measures and alternative solutions. If it is not possible to identify mitigation and alternatives it will be necessary to establish the '*imperative reasons of overriding public interest*' (IROPI). This is not considered a standard part of the process and will only be carried out in exceptional circumstances.

All 3 stages of the process are referred cumulatively as Habitat Regulations Assessment, to clearly distinguish the whole process from the step within it referred to as the Appropriate Assessment.

1.3 Consultation with Natural England

Natural England (NE) has been positively engaged in PCC's work on Habitat Regulations Assessment since its inception in November 2006. An open & constructive dialogue has been maintained throughout the process, and NE have endorsed the conclusions of Plymouth's LDF Core Strategy HRA.

NE has been consulted on this screening report for the North Plymstock Area Action Plan and they are happy with the recommendations and conclusions reached.

2. Screening

The principle aim of this chapter is to ‘screen’ the potential of North Plymstock AAP for its likely impact on the Natura 2000 sites within 15 kilometres of the Area Action Plan boundary.

The screening process aims to be a first sieve of the European sites that the AAP could possibly affect. This section identifies

- Identifies European sites within 15km of the North Plymstock AAP boundary (section 2.1);
- Summarises what the possible effects of the AAP on those sites could be (Section 2.2);
- Lists existing trends that could affect the sites ‘in combination’ with the AAP; (Section 2.3)
- Consider possible effects of the AAP in relation to the ecological requirements of the sites qualifying features & screen out sites that are unlikely to be affected by the Core Strategy. (Section 2.4)
- Considers the specific AAP visions, objectives, policies & proposals that may cause an adverse impact relevant to the Natura 2000 sites, and screen out those that will have no significant effect (Section 2.5)

In undertaking the screening stage of Plymouth's LDF Core Strategy HRA a highly precautionary approach was adopted. At that stage no assumptions or allowances were made for existing regulatory mechanisms (eg EA's regulatory role), management structures (eg. Tamar Estuaries Consultative Forum), or the LDF's policies or proposals that seek to conserve, or enhance the natural environment. The role these tools have to play in ensuring that the Plymouth's LDF does not adversely affect the integrity of the Natura 2000 sites where examined in detail as part of Core Strategy Appropriate Assessment.

The policies and proposals contained with the AAP are built upon the foundations expressed with the Core Strategy. Therefore in determining whether there is a risk of significant effect this assessment will 'screen out' those impacts already identified and addressed through the Core Strategy HRA. The screening stage of this HRA will also take a precautionary approach but will seek to identify the impacts that are at risk of becoming significant as a result of the area specific detail identified in the AAP.

2.1 European Sites

Table 1 lists the European sites that are within 15 km of the boundary of North Plymstock.

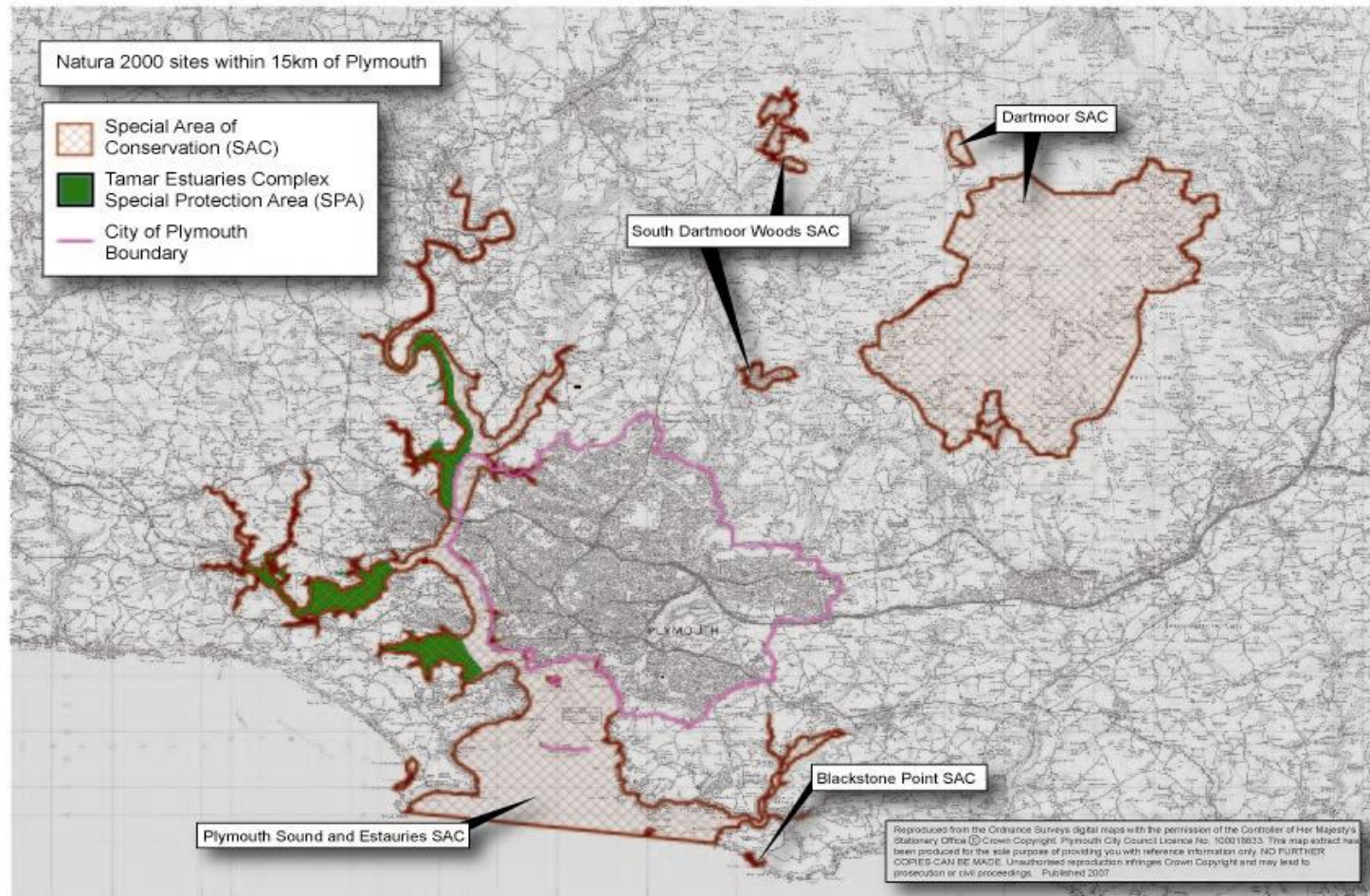
Name of Site	Reasons for Designation
Plymouth Sound & Estuaries SAC	Sandbanks which are slightly covered by sea water all the time. Estuaries. Mudflats and sandflats not covered by seawater at low tide. Large shallow inlets and bays. Reefs. Shore dock. Allis shad.
Tamar Estuaries Complex SPA	Internationally important populations of Avocet & Little Egret
Dartmoor SAC	Northern Atlantic wet heath with <i>Erica tetralix</i> . European dry heath. Blanket bog. Old sessile oak woodlands <i>Ilex</i> and <i>Blechnum</i> in the British Isles. Southern damselfly, <i>Coenagrion mercuriale</i> Otter <i>Lutra lutra</i> Atlantic salmon <i>Salmo salar</i>
South Dartmoor Woods SAC	Old sessile oak woodlands <i>Ilex</i> and <i>Blechnum</i> in the British Isles European dry heath
Blackstone Point SAC	Shore dock

Table 1: European sites that could possibly be adversely affected by the Plymouths Core Strategy

Map 1 shows the position of North Plymstock Area Action Plan in relation to the city boundary



Map 2 Distribution of Nature 2000 sites within 15km of Plymouth city boundary



2.2 Possible effects of the North Plymstock Area Action Plan

PCC's North Plymstock AAP provides for

- The development of sustainable mixed use neighbourhood at Plymstock Quarry
- Contributions towards the creation of a neighbourhood at Sherford that integrates effectively with the wider Plymouth urban area
- New high quality public transport infrastructure
- New areas of accessible natural green space within a countryside park
- 2500 homes between 2006 - 2021
- 3.5 hectares of employment land
- Protection of Mineral reserves

As such, the possible impacts of the AAP on the Natura 2000 sites are identified as arising from:

- Urbanisation generally: more development, more activity, more noise, light etc.
- Increased visits to the European sites, possibly with associated disturbance of fauna and impacts on the habitats (e.g. through trampling on the moors , increases in water borne recreation)
- Increased traffic, leading to increased air pollution, which could affect habitats / species sensitive to air quality
- Increased water use, which could, depending on where the water comes from (or goes to) affect water levels or water quality within the European sites.
- Pressure for land claim & associated loss or modification of coastal habitats

2.3 Existing Trends and Possible Future Development

The South West Regional Spatial Strategy (RSS) Sustainability Appraisal report identifies a range of 'likely negative effects' of the draft RSS. These are that could have an 'in combination' effect with the impacts of Plymouth's Core Strategy:

- Increased carbon dioxide emissions due to increases in air travel within the region
- Reduction in air quality due to increased car travel within the region
- A gradual increase in light & noise pollution

These should be considered as having the potential to act in combination with Plymouth's LDF Core Strategy

Table 2 below summarises developments in other areas of Plymouth, or nearby districts that could also lead to 'in combination' impacts with Plymouth's Core Strategy

Area	Development Plans or Proposals
Plymouth	Plymouth's LDF Core Strategy sets out a vision to deliver 24,500 dwellings between 2006 – 2026, 130ha of employment land between 2006 – 2026, and to achieving the city's potential as ' <i>economic hub of the far South-West</i> '. Impacts identified for North Plymstock AAP may work in combination with other impacts generated through the Core Strategy or other submitted Local Development Documents. e.g. Millbay & Stonehouse AAP Devonport AAP
Caradon DC	1000 Residential dwellings (Draft RSS for South West 2006 - 2026)
South Hams DC	Sherford Area Action Plan - 4,000 dwellings by 2016 with potential expansion to 5500 dwellings Plymouth Urban Fringe AAP 500 dwellings, Existing permission for Langage Power Station
Dartmoor National Park	LDF Core Strategy Preferred Options report

Table 2: Plans or projects with potential 'In combination' impacts

2.4 Screening – Site qualifying features and potential impacts

Table 3 documents the screening process for the SPA's/SAC's potentially affected by the North Plymstock Area Action Plan, and considers the significance of a range of possible impacts in relation to the individual sites qualifying features. A significant effect is considered to be one that is not trivial or inconsequential, but an effect that is potentially relevant to the sites conservation objectives.

Table 3: Significant effects matrix for Plymouth City Council North Plymstock Area Action Plan

Site	Qualifying Features	Possible impacts arising from the North Plymstock Area Action Plan	Is there a risk of significant effect?	Possible impacts from other trends, plans etc	Is there a significant risk of In combination effects?
Plymouth Sound & Estuaries SAC	Sandbanks which are slightly covered by sea water all the time. Estuaries. Mudflats and sandflats not covered by seawater at low tide. Large shallow inlets and bays. Reefs. Shore dock. Allis shad.	Toxic or non toxic contamination – changes in water quality due to changes in run-off regimes or increased pressure on existing water treatment works .	No (see Core Strategy HRA)	Impacts on water quality upon the SAC due to high levels of growth within sub region	No
		Toxic or non toxic contamination due to increased water borne recreation.	Yes	Increased recreational pressures due to high levels of growth within the sub region	Yes
		Physical Damage – increased threats to seagrass beds by / recreational pressures of anchoring & mooring.	Yes	Increased recreational pressures due to high levels of growth within the sub region	Yes
		Biological disturbance – Impacts of increased demand for recreational angling	Yes	Increased recreational pressures due to high levels of growth within the sub region	Yes
Tamar Estuaries Complex SPA	Little Egret 9% passage population in the UK & 8.4% wintering population; Avocet 15.8% of the wintering population in the UK.	Non-physical disturbance - increased noise & visual presence associated with recreational disturbance	Yes	Increased recreational pressures due to high levels of growth within the sub region	Yes
		Biological disturbance - (e.g. impacts of bait digging / shore crab fishery	Yes	Increased recreational pressures due to high levels of growth within the sub region is likely increase bait digging activity within the Tamar catchments	Yes
		Toxic or non toxic contamination – changes in water quality due to changes in runoff regimes &	No (see Core Strategy HRA)	Impacts on water quality upon the SPA due to high levels of growth within sub region	No

Site	Qualifying Features	Possible impacts arising from the North Plymstock Area Action Plan	Is there a risk of significant effect?	Possible impacts from other trends, plans etc	Is there a significant risk of In combination effects?
		increased pressure on existing water treatment works			
Dartmoor SAC	Northern Atlantic wet heath with <i>Erica tetralix</i> . European dry heath. Blanket bog. Old sessile oak woodlands <i>Ilex</i> and <i>Blechnum</i> in the British Isles. Southern damselfly, <i>Coenagrion mercuriale</i> Otter <i>Lutra lutra</i> Atlantic salmon <i>Salmo salar</i>	Physical damage - Increased recreational pressure causing damage due to trampling / fire	No (see Core Strategy HRA)	Increased recreational pressures due to high levels of growth within the sub region	No
		Increased water extraction	No (see Core Strategy HRA)	Levels of growth within the sub region will also increase water demand within the sites catchments	No
		Air Pollution - changes in air quality may have detrimental effect on blanket bog, Old sessile oak woods, wet heaths and dry heath features	No (see Core Strategy HRA)	Langage Power Station General reduction in air quality due to increased car travel within the region	No
		Water quality changes – impacts on breeding & migratory salmon populations & otter	No (see Core Strategy HRA)	Levels of growth within the sub region will also increase water use within the sites catchments	No
South Dartmoor Woods SAC	Old sessile oak woodlands <i>Ilex</i> and <i>Blechnum</i> in the British Isles European dry heath	Physical damage - Increased recreational pressure at woodlands at Damage due to trampling / fire.	No (see Core Strategy HRA)	Increased recreational pressures due to high levels of growth within the sub region	No
		Air pollution	No (see Core Strategy HRA)	Langage Power Station General reduction in air quality due to increased car travel within the region	No
Blackstone Point SAC	Shore dock	Physical damage - Increased recreational pressure	No - shore dock is confined to areas not normally associated with high visitor pressure.	Increased recreational pressures due to high levels of growth within the sub region	No

2.5 Screening - Policy Review

2.5.1. Review Criteria

To refine the assessment a detailed review of objectives & proposals within the AAP has been undertaken. To build upon the work completed in Table 3 this review focus on the effect of these policies on levels of recreational disturbance and identifies those that:

- a) could have no effect on the Natura 2000 sites
- b) could possibly have an effect on the Natura 2000 sites
- c) would be likely to have a significant effect on the Natura 2000 sites

This screening of the potential effects of the document used the criteria set out in Table 4. These criteria are based on the approach proposed in 'The Assessment of Regional Spatial Strategies and Sub-regional strategies under the provisions of the Habitats Regulations' Draft Guidance English Nature August 2006. They have been modified to reflect the content & characteristic of Plymouth's LDF.

Effect of LDF Objective, Vision or Policy on Nature 2000 sites	Criteria Number	Rationale
No significant adverse effect on the Natura 2000 sites (Shown green on Table 5)	1	The policy will not itself lead to development (e.g. it relates to design or other qualitative criteria for development, or it is not a land use planning policy)
	2	No development could occur through this policy alone, because it is implemented through sub-ordinate policies or DPDs, which are more detailed and therefore more appropriate to assess for their effects on European Site, and associated sensitive areas.
	3	The policy steers a quantum or type of development that can have no foreseeable, direct or indirect effect upon the Natura 2000 sites
	4	The policy is intended to conserve or enhance the historic or natural environment, including biodiversity, and enhancement measures will not be likely to have any effect on a European Site.
Possible adverse effect on the Natura 2000 sites (shown yellow on Table 5)	5	The policy steers a quantum or type of development towards, or encourages development in, an area that includes a European Site or an area where development could possibly indirectly affect a European Site.
Likely to have a significant adverse effect on Natura 2000 sites (shown Red on Table 5)	6	The policy makes provision for a quantum, or type of development that in the location(s) proposed would be likely to have a significant effect on a European Site. The proposal must be subject to appropriate assessment to establish, in light of the site's conservation objectives, whether it can be ascertained that the proposal would not adversely affect the integrity of the site.

Table 4: Habitat Regulations assessment - Screening criteria for North Plymstock AAP Policies.

2.5.2. Policy Review Results

Table 5 displays the results of applying the criteria shown above to the individual policies.

Table 5: Matrix to show results of North Plymstock AAP HRA Policy Impact Review

Site Name			Plymouth Sound & Estuaries SAC	Tamar Estuaries Complex SPA
Objective Or Proposal Ref.	Objective or Proposal Area	Review Criteria	Potential Effect or Impact	
			Recreational Disturb.	Recreational Disturb.
Objective 1:	Plymstock Quarry	1,2		
NP01	Plymstock Quarry new neighbourhood	5		
NP02	Pomphlett Industrial Estate	5		
NP03	Wakehams Quarry	5		
NP04	Billacombe Green	4		
Objective 2:	Contributions to Sherford new neighbourhood	1,2		
NP05	Sherford & Sport Hub (North Elburton)	5		
NP06	Future development options north of Elburton	2		
Objective 3:	Transport Infrastructure	2		
NP07	High Quality Public Transport Route	3		
NP08	Public transport Improvements	3		
NP09	Highway Infrastructure Improvements & Traffic Management	3		
NP10	National Cycle Network	3		
Objective 4:	Countryside Park	4		
NP11	Countryside Park	4		
NP12	Chelson Meadow restored landfill site	4		
Objective 5:	Eastern Gateway	2		
Objective 6:	Mineral Reserves	2		
NP13	Hazeldene Quarry	3		
Objective 7:	Waste Management	2		
NP14	Chelson Meadow waste management centre	3		
NP15	Moorcroft Quarry	3		
Objective 8:	Safeguard post 2016 development options	2		
NP16	Land north of Hazeldene Quarry	2		

2.6 Conclusions – Habitat Regulations Assessment - Screening Stage

The potentially significant adverse impacts of the North Plymstock AAP identified through Section 2.4 are:

- Recreational disturbance impacts at Plymouth Sound & Estuaries SAC
- Recreational disturbance impacts at Tamar Estuaries Complex SPA

Section 2.5.2 identifies the following proposals from the North Plymstock Area Action Plan that could be seen as increasing the recreational disturbance within the Natura 2000 sites, and which could '*possibly cause adverse effect on the Natura 2000 sites*' (shown yellow on Table 5):

- NP01 Plymstock Quarry
- NP02 Pomphlett Industrial Estate
- NP03 Wakehams Quarry
- NP05 Sherford & Sport Hub

Guidance outlined in 'The Assessment of Regional Spatial Strategies and sub-regional strategies under the provisions of the Habitats Regulations' (English Nature August 2006 Draft Guidance) indicates that policies which could '*possibly cause adverse effect on the Natura 2000 sites*' should require the inclusion within the policy, or the explanatory text, wording that makes it clear any development directed or encouraged by this policy, would not be in accordance with the plan.

In the absence of any specific national guidance in relation to the assessment of LDF's it is proposed that this approach is modified to:

1. Reflect the greater level of detail being brought forward within the Area Action Plans,
2. Reflect the fact that higher level policies within the Core Strategy that have already been modified in line with this guidance as a result of the Core Strategy HRA
3. Provide a signpost towards the avoidance mechanisms for dealing with recreational impacts already identified as part of Core Strategy HRA.

Using this approach it is recommended that each of the policies identified in Section 2.5.2 as having '*possible adverse effect on the Natura 2000 sites*' should be amended to include reference to the need to provide *appropriate contributions towards managing off site recreational impacts within Plymouth Sound & Estuaries SAC and Tamar Estuaries SPA*.

This recommendation is made in light of PCC's existing commitment made as a result of the Core Strategy HRA to provide within the forthcoming Planning Obligations SPD appropriate provisions for negotiating individual contributions towards managing recreational impact within Plymouth Sound & Estuaries European Marine site. Consultation on this document is expected to start in June 2007.

Subject to the above amendments to proposals within the North Plymstock AAP, this screening stage Habitat Regulations Assessment can conclude that there will be no significant adverse impact on the integrity of the Natura 2000 sites.

Appendix 1: Summary of conclusions from Core Strategy Habitat Regulation Assessment

The results of Plymouth LDF Core Strategy Habitat Regulation Assessment are summarised as :

Screening the potential impacts of Plymouth's LDF Core Strategy against the local Natura 2000 sites qualifying features identified the following potentially significant adverse impacts:

- Water quality impacts at Plymouth Sound & Estuaries SAC, Tamar Estuaries Complex SPA & Dartmoor SAC
- Recreational disturbance impacts at South Dartmoor Woods SAC, Dartmoor SAC, Plymouth Sound & Estuaries & Tamar Estuaries Complex SPA
- Biological Disturbance impacts from shore crab fishery & bait digging at Tamar Estuaries Complex SPA
- Impacts linked to water abstraction at Plymouth Sound & Estuaries SAC, Tamar Estuaries Complex SPA, Dartmoor SAC & South Dartmoor Woods SAC,
- Impacts linked to air quality changes at South Dartmoor Woods SAC & Dartmoor SAC
- Cumulative impacts of habitat loss associated with numerous small scale land claim events within Plymouth Sound & Estuaries SAC & Tamar Estuaries Complex SPA

Screening the LDF Core Strategy's objectives & policies against the above sites and potential impacts (identified the following statements that may cause '*Possible adverse effect on the Natura 2000 sites*':

- SO1 Delivering Plymouth's Strategic Role
- AV2 Millbay & Stonehouse
- CS12 Culture & Leisure Considerations
- CS25 Provision for Waste Management
- SO14 Delivering Sustainable Transport
- CS27 Supporting Strategic Infrastructure Proposals

All of the above will now include within the policy, or the explanatory text, wording that makes it clear any development directed or encouraged by this policy, which is determined to have an adverse affect on the Natura 2000 sites, would not be in accordance with the LDF.

The Core Strategy HRA policy review matrix also identified the following objectives & policies of Plymouth's LDF Core Strategy that are '*Likely to have a significant adverse effect on Natura 2000*'

- SO10 Delivering Adequate Housing
- CS16 Spatial Distribution of Housing Sites
- SO6 Delivering the Economic Strategy
- CS04 Employment Provision

An Appropriate Assessment (AA) scrutinised the role of these policies in driving the full range of impacts noted above. **The AA concluded that subject to the avoidance measures identified below the Plymouths LDF Core Strategy will not cause an adverse impact on the integrity of any Natura 2000 sites.** In addition to the avoidance measures each of these policies also should be accompanied by explanatory text that makes it clear any development directed or encouraged by this policy, which is determined to have an adverse affect on the Natura 2000 sites, would not be in accordance with the LDF.

To avoid a significant adverse impact on the integrity of Plymouth Sound & Estuaries SAC, & Tamar Estuaries Complex SPA, arising from future recreational pressure Plymouth City Council will commit to the following:

1. *Partnership funding & support for the Tamar Estuaries Consultative Forum.*
2. *Project funding & support: Provide funding and relevant officer time to support recreation linked actions / projects as identified in Tamar Estuaries Management Plan Chapter 1 and 10. This should include a review and update of Port of Plymouth Area Recreation Study as a priority.*
3. *Preparation of a Planning Obligations SPD - Plymouth's forthcoming Planning Obligations SPD will include appropriate provisions for negotiating individual contributions towards managing recreational impact within Plymouth Sound & Estuaries European Marine site.*
4. *Coastal Planning SPD - Inclusion of relevant guidance in relation to shore side development in respect to managing recreational use of surrounding waters.*

To avoid significant adverse impact on the integrity of Plymouth Sound & Estuaries SAC, arising from numerous small land claim events Plymouth City Council will commit to the following:

1. *Additional explanatory text associated with Policy CS19 that makes clear that the policy relates to the development in inter tidal or sub tidal areas, as well as terrestrial habitats*
2. *Preparation of a Coastal Planning SPD - Inclusion of relevant guidance in relation to inter tidal & sub tidal development*

The Appropriate Assessment process identified a number of impacts that are not significant but that should be addressed as part of raft of measures to improve sustainability of future DPDs, SPDs and site master plans. These are:

1. *The importance of promoting water efficient design to minimise demand and moderate the requirement for waste water treatment. This could be pursued through requiring all new and refurbished buildings achieve the requirements of BREEAM and Eco Homes very good standard, or at least level 3 above minimum building standards in the emerging Code for Sustainable Homes. More detailed guidance in relation to requirements for water efficient design should be included in Plymouth's proposed Design SPD.*
2. *The importance of ensuring that policies such as Plymouth's Core Strategy LDF CS19, CS 20 Resource Use, South West Regional Spatial Strategy Policy G Sustainable Construction, & Policy RE 1 are robustly applied.*
3. *The need to continue the work identified in 'Charter for Countryside & Seas in and around Plymouth' (2005) to work with Natural England/ neighbouring authorities to plan / manage sustainable recreation at key sites within SE Dartmoor.*