

Habitat Regulations
Assessment Screening:
Buckland Monachorum
Neighbourhood Plan (Draft
4.5 December 2016)

Buckland Monachorum Parish Council

June 2017

Quality information

HABITAT REGULATIONS ASSESSMENT OF THE: BUCKLAND MONACHORUM NEIGHBOURHOOD PLAN (DRAFT 4.5
DECEMBER 2016)

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1. Introduction

1.1. Background to the Project

AECOM was appointed by Buckland Monachorum Parish Council to produce a report to assist West Devon District Council and Dartmoor National Park Authority (as competent authorities) in making a Habitats Regulations Assessment (HRA) of the Buckland Monachorum Neighbourhood Plan (hereafter referred to as the 'Neighbourhood Plan' or the 'Plan'). The objectives of the assessment were to:

- Identify any aspects of the Neighbourhood Plan that would cause an adverse effect on the integrity of Natura 2000 sites, otherwise known as European sites (Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and, as a matter of Government policy, Ramsar sites), either in isolation or in combination with other plans and projects; and
- To advise on appropriate policy mechanisms for delivering mitigation where such effects were identified.

The Parish of Buckland Monachorum is located within West Devon District, which is the process of preparing the Pre-Submission Plymouth and South West Devon Joint Local Plan (hereafter referred to as the 'Joint Local Plan') with Plymouth City Council. Although not yet submitted to the Secretary of State, an advanced draft Local Plan is still a material consideration according to the NPPF and the Neighbourhood Plan should be in general conformity with it.

The Neighbourhood Plan seeks to allocate two development sites (one in Buckland and one in Yelverton) and correspondence from Natural England¹ advises that, since these specific allocations are not made in the Local Plan, the implications of allocating these two specific sites need consideration.

1.2. Legislation

The need for Habitats Regulations Assessment is set out within Article 6 of the EC Habitats Directive 1992, and interpreted into British law by the Conservation of Habitats and Species Regulations 2010. The ultimate aim of the Directive is to "*maintain or restore, at favourable conservation status, natural habitats and species of wild fauna and flora of Community interest*" (Habitats Directive, Article 2(2)). This aim relates to habitats and species, not the European sites themselves, although the sites have a significant role in delivering favourable conservation status.

The Habitats Directive applies the precautionary principle to European sites. Plans and projects can only be permitted having ascertained that there will be no adverse effect on the integrity of the site(s) in question. Plans and projects with predicted adverse impacts on European sites may still be permitted if there are no alternatives to them and there are Imperative Reasons of Overriding Public Interest (IROPI) as to why they should go ahead. In such cases, compensation would be necessary to ensure the overall integrity of the site network.

In order to ascertain whether or not site integrity will be affected, a Habitats Regulations Assessment should be undertaken of the plan or project in question:

¹ Letter from C. Reeder (Natural England) to R Cheadle (Buckland Monachorum Parish Council) dated 21/03/17. Natural England reference 205461

Box 1: The legislative basis for Appropriate Assessment

Habitats Directive 1992

Article 6 (3) states that:

“Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives.”

Conservation of Habitats and Species Regulations 2010 (as amended)

The Regulations state that:

“A competent authority, before deciding to ... give any consent for a plan or project which is likely to have a significant effect on a European site ... shall make an appropriate assessment of the implications for the site in view of that sites conservation objectives... The authority shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the European site”.

Over the years the phrase ‘*Habitats Regulations Assessment*’ has come into wide currency to describe the overall process set out in the Conservation of Habitats and Species Regulations from screening through to IROPI. This has arisen in order to distinguish the process from the individual stage described in the law as an ‘*appropriate assessment*’. Throughout this report we use the term Habitats Regulations Assessment for the overall process.

1.3. Scope of the Project

There is no pre-defined guidance that dictates the physical scope of a HRA of a Neighbourhood Plan. Therefore, in considering the physical scope of the assessment, we were guided primarily by the identified impact pathways rather than by arbitrary ‘*zones*’. Current guidance suggests that the following European sites be included in the scope of assessment:

- All sites within the Neighbourhood Plan area boundary; and
- Other sites shown to be linked to development within the boundary through a known ‘*pathway*’.

Briefly defined, pathways are routes by which a change in activity as a result of the Neighbourhood Plan can lead to an effect upon a European site. In terms of the second category of European site listed above, guidance from the former Department of Communities and Local Government states that the HRA should be ‘*proportionate to the geographical scope of the [plan policy]*’ and that ‘*an AA need not be done in any more detail, or using more resources, than is useful for its purpose*’ (CLG, 2006, p.6). More recently, the Court of Appeal ² ruled that providing the Council (competent authority) was duly satisfied that proposed mitigation could be ‘*achieved in practice*’ to satisfied that the proposed development would have no adverse effect, then this would suffice. This ruling has since been applied to a planning permission (rather than a Neighbourhood Plan document)³. In this case the High Court ruled that for ‘*a multistage process, so long as there is sufficient information at any particular stage to enable the authority to be satisfied that the proposed mitigation can be achieved in practice it is not necessary for all matters concerning mitigation to be fully resolved before a decision maker is able to conclude that a development will satisfy the requirements of the Habitats Regulations*’.

Plymouth Sound and Estuaries SAC and the Tamar Estuaries Complex SPA lie immediately adjacent the south western corner of the area covered by the Buckland Monachorum Neighbourhood Plan; South Dartmoor Woods

² No Adastral New Town Ltd (NANT) v Suffolk Coastal District Council Court of Appeal, 17th February 2015

³ High Court case of R (Devon Wildlife Trust) v Teignbridge District Council, 28 July 2015

SAC (Shaugh Prior Woods SSSI) is located 1.2km southeast of the Neighbourhood Plan area, and Dartmoor SAC at its closest is located 4.6km east of the Buckland Monachorum Neighbourhood Plan area.

1.4. This Report

Chapter 2 of this report explains the process by which the report to inform an HRA has been carried out. Chapter 3 details the features for which the Plymouth Sound and Estuaries SAC, South Dartmoor Woods SAC, Dartmoor SAC and the Tamar Estuaries Complex SPA are designated and identifies potential environmental vulnerabilities. Chapter 4 is the screening assessment of the policies and allocations within the Neighbourhood Plan. In-combination assessment is undertaken in Chapter 5, along with recommendations; and the key findings are summarised in Chapter 6: Conclusions. Appendix A, Figure A1 illustrates the location of internationally designated sites in relation to the Buckland Monachorum Neighbourhood Plan area.

2. Methodology

2.1. Introduction

The HRA has been carried out in the continuing absence of formal central Government guidance, although general EC guidance on HRA does exist⁴. The former Department for Communities and Local Government released a consultation paper on the Appropriate Assessment of Plans in 2006⁵. As yet, no further formal guidance has emerged. However, Natural England has produced its own internal guidance⁶ as has the RSPB⁷. Both of these have been referred to alongside the guidance outlined in section 1.2 in undertaking this HRA.

Figure 1 below outlines the stages of HRA according to current draft CLG guidance. The stages are essentially iterative, being revisited as necessary in response to more detailed information, recommendations and any relevant changes to the plan until no significant adverse effects remain.

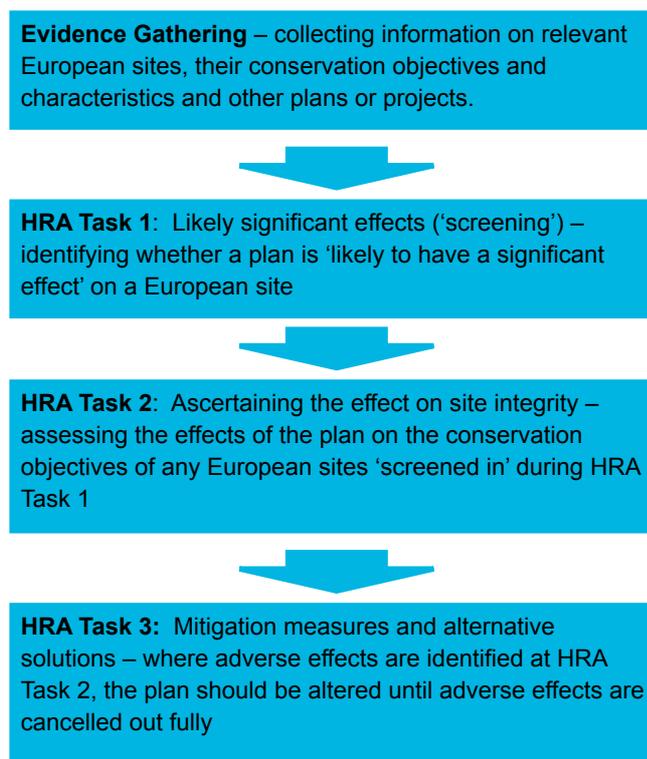


Figure 1: Four Stage Approach to Habitats Regulations Assessment. Source CLG, 2006.

2.2. HRA Task 1 – Likely Significant Effects (LSE)

Following evidence gathering, the first stage of any Habitats Regulations Assessment is a Likely Significant Effect (LSE) test - essentially a risk assessment to decide whether the full subsequent stage known as Appropriate Assessment is required. The essential question is:

⁴ European Commission (2001): Assessment of plans and projects significantly affecting Natura 2000 Sites: Methodological Guidance on the Provisions of Article 6(3) and 6(4) of the Habitats Directive.

⁵ CLG (2006) Planning for the Protection of European Sites, Consultation Paper

⁶ http://www.ukmpas.org/pdf/practical_guidance/HRGN1.pdf

⁷ Dodd A.M., Cleary B.E., Dawkins J.S., Byron H.J., Palframan L.J. and Williams G.M. (2007) *The Appropriate Assessment of Spatial Plans in England: a guide to why, when and how to do it*. The RSPB, Sandy.

"Is the Plan, either alone or in combination with other relevant projects and plans, likely to result in a significant effect upon European sites?"

The objective is to 'screen out' those plans and projects that can, without any detailed appraisal, be said to be unlikely to result in significant adverse effects upon European sites, usually because there is no mechanism for an adverse interaction with European sites. This stage is undertaken in Chapter 4 of this report.

In evaluating significance, AECOM have relied on our professional judgement as well as the results of previous stakeholder consultation regarding development impacts on the European sites listed in Section 1.3.

The level of detail in land use plans concerning developments that will be permitted under the plans will never be sufficient to make a detailed quantification of adverse effects. Therefore, we have again taken a precautionary approach (in the absence of more precise data) assuming as the default position that if an adverse effect cannot be confidently ruled out, avoidance or mitigation measures must be provided. This is in line with the former Department of Communities and Local Government guidance that the level of detail of the assessment, whilst meeting the relevant requirements of the Habitats Regulations, should be 'appropriate' to the level of plan or project that it addresses (see Appendix B for a summary of this 'tiering' of assessment).

2.3. Other Plans and Projects That May Act in Combination

It is a requirement of the Regulations that the impacts of any land use plan being assessed are not considered in isolation but in combination with other plans and projects that may also be affecting the European site(s) in question.

For the purpose of this assessment, the following documents will be considered in combination with the Neighbourhood Plan as these provide for strategic levels of development within areas associated with the Plymouth Sound and Estuaries SAC, South Dartmoor Woods SAC, Dartmoor SAC and the Tamar Estuaries Complex SPA.

- Pre-Submission Plymouth & South West Devon Joint Local Plan 2014-2034 (Regulation 19 consultation 15/03/17–26/04/17);
- Dartmoor National Park Local Development Framework Core Strategy Development Plan Document 2006 - 2026 (Adopted 2008; currently under review, consultation closed 13/01/17); and
- The Cornwall Local Plan (2010 -2030) (adopted November 2016)

When undertaking this part of the assessment it is essential to bear in mind the principal intention behind the legislation i.e. to ensure that those projects or plans which in themselves have minor impacts are not simply dismissed on that basis, but are evaluated for any cumulative contribution they may make to an overall significant effect. In practice, in combination assessment is therefore of greatest relevance when the plan would otherwise be screened out because its individual contribution is inconsequential.

3. European Sites

3.1. Plymouth Sound and Estuaries SAC

3.1.1. Introduction

Plymouth Sound and Estuaries SAC is 6386.95 ha in size and incorporates the Plymouth Sound, River Tavy and River Tamar situated around and north of the City of Plymouth. It contains the component Tamar – Tavy Estuary SSSI.

The SAC is considered to be one of the best areas of Sandbanks slightly covered by sea water all the time, estuaries, large shallow inlets and bays, reefs, Atlantic salt meadows (*Glauco-Puccinellietalia maritima*) and areas of shore dock (*Rumex rupestris*) in the UK. It also supports a significant presence of Allis shad (*Alosa alosa*) and mudflats and sandflats not covered by seawater at low tide.

Within the SAC lies the Tamar - Tavy Estuary SSSI, designated as the site supports a nationally important wintering population of the uncommon Avocet (*Recurvirostra avosetta*), and encompasses a section of the River Tamar that is considered to be of national significance for its marine biological interest. The site includes estuarine habitats, with uncommon species, that are notable in their extent and also supports the only British population of the Triangular Club-rush (*Schoenoplectus triqueter*).

3.1.2. Reasons for Designation

The site is designated as an SAC for the following features:

- Sandbanks slightly covered by sea water all the time;
- Estuaries;
- Large shallow inlets and bays;
- Reefs;
- Atlantic salt meadows (*Glauco-Puccinellietalia maritima*);
- Mudflats and sandflats not covered by seawater at low tide;
- Shore dock (*Rumex rupestris*) and;
- Allis shad (*Alosa alosa*).

3.1.3. Potential Environmental Vulnerabilities

- Urbanisation, industrial and similar activities;
- Pollution to groundwater (point sources and diffuse sources);
- Human induced changes in hydraulic conditions;
- Outdoor sports and leisure activities, recreational activities; and
- Changes in abiotic conditions.

3.1.4. Conservation Objectives⁸

With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features', listed in Section 3.1.2), and subject to natural change, the following 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;

⁸ Natural England (2014). European Site Conservation Objectives for Plymouth Sound and Estuaries SAC (UK0013111)

- 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 the habitats of qualifying species rely;
- The populations of qualifying species; and
- The distribution of qualifying species within the site.

3.2. South Dartmoor Woods SAC

3.2.1. Introduction

South Dartmoor Woods SAC is 2159.06 ha in size and is divided in to 7 sites:

- Bovey Valley Woodlands SSSI;
- Hembury Woods SSSI;
- Holne Woodlands SSSI;
- Sampford Spiney SSSI;
- Shaugh Prior Woods SSSI;
- Teign Valley Woods SSS; and
- Yarner Wood & Trendlebere Down SSSI.

The closest site to the Buckland Monachorum Neighbourhood Plan area is the Shaugh Prior Woods SSSI;

The SAC surrounds the Dartmoor SAC and is made up of a complex of old sessile oak woods in south-west England and supports nationally important assemblages of lower plants and dry Lobarion communities that are unique in Western Europe. The woods are notable for the variations in stand type that reflect past management (old coppice and high forest) and also include grazed and ungrazed areas.

3.2.2. Reasons for Designation

The site is designated as an SAC for the following features:

- European dry heaths; and
- Old sessile oak woods with *Ilex* and *Blechnum* in the British Isles. (Western acidic oak woodland).

3.2.3. Potential Environmental Vulnerabilities

- Air pollution, air-borne pollutants

3.2.4. Conservation Objectives⁹

With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features', listed in Section 3.2.2), and subject to natural change, the following 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;
 - The structure and function (including typical species) of qualifying natural habitats; and

⁹ Natural England (2014). European Site Conservation Objectives for South Dartmoor Woods SAC (UK0012749)

- The supporting processes on which qualifying natural habitats rely the distribution of qualifying species within the site.

3.3. Dartmoor SAC

3.3.1. Introduction

Dartmoor SAC is 23158.64 ha in size and has 6 component SSSI sites:

- Dendles Wood SSSI;
- East Dartmoor SSSI;
- North Dartmoor SSSI;
- South Dartmoor SSSI;
- Tor Royal Bog SSSI; and
- Wistman's Wood SSSI.

The closest site to the Buckland Monachorum Neighbourhood Plan area is the Dendles Wood SSSI.

The SAC lies within the centre of Devon and encompasses the majority of the Nation Park. Dartmoor is the southernmost blanket bog in Europe and the main vegetation community is deergrass – hare's-tail cottongrass (*Trichophorum cespitosum* – *Eriophorum vaginatum*) blanket mire.

3.3.2. Reasons for Designation

The site is designated as a SAC for the following features:

- Northern Atlantic wet heaths with *Erica tetralix*;
- European dry heaths;
- Blanket bogs (* if active bog) * Priority feature;
- Old sessile oak woods with *Ilex* and *Blechnum* in the British Isles;
- Southern damselfly (*Coenagrion mercurial*);
- Atlantic salmon (*Salmo salar*); and
- Otter (*Lutra lutra*).

3.3.3. Potential Environmental Vulnerabilities

- Other human intrusions and disturbances;
- Grazing;
- Air pollution, air-borne pollutants;
- Pollution to groundwater (point sources and diffuse sources); and
- Human induced changes in hydraulic conditions.

3.3.4. Conservation Objectives¹⁰

With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features', listed in Section 3.3.2), and subject to natural change, the following conservation objectives apply;

¹⁰ Natural England (2014). European Site Conservation Objectives for Dartmoor SAC (UK0012929)

- 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 the habitats of qualifying species rely;
 - The populations of qualifying species; and
 - The distribution of qualifying species within the site.

3.4. Tamar Estuaries Complex SPA

3.4.1. Introduction

The Tamar Estuaries Complex SPA is 1955 ha in size and lies within the Plymouth Sound and Estuaries SAC. The Tamar Estuary lies on the border between Devon and Cornwall on the southern coast of England. The estuary system is a large marine inlet on the English Channel coast comprising the estuaries of the rivers Tamar, Lynher and Tavy which collectively drain an extensive part of Devon and Cornwall. The Tamar river and its tributaries provide the main input of fresh water into the estuary complex, and form a ria (drowned river valley) with Plymouth lying on the eastern shore. The broader lower reaches of the rivers form extensive tidal mud-flats bordered by saltmarsh communities. The mud-flats contain extensive and varied infaunal communities rich in bivalves and other invertebrates, and feeding grounds for waterbirds in numbers of European importance. Saltmarshes provide important feeding and roosting areas for large numbers of wintering and passage waterbirds.

3.4.2. Reasons for Designation

The site is designated as a SPA for the following features:

- On passage;
 - Little Egret (*Egretta garzetta*), 72 individuals representing at least 9.0% of the population in Great Britain (Count as at 1993)
- Over winter;
 - Avocet (*Recurvirostra avosetta*), 201 individuals representing at least 15.8% of the wintering population in Great Britain (5 year peak mean 1991/2 - 1995/6); and
 - Little Egret (*Egretta garzetta*), 42 individuals representing at least 8.4% of the wintering population in Great Britain (Count as at 1993).

3.4.3. Potential Environmental Vulnerabilities

- Coastal squeeze;
- Loss of supporting habitat;
- Water pollution;
- Recreational pressure; and
- Atmospheric pollution.

3.4.4. Conservation Objectives¹¹

With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features', listed in Section 3.3.2), and subject to natural change, the following 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.

¹¹ Natural England (2014). European Site Conservation Objectives for Tamar Estuaries Complex SPA (UK9010141)

4. Likely Significant Effects Test of the Buckland Monachorum Neighbourhood Plan

Following the analysis of the draft Buckland Monachorum Neighbourhood Plan (Draft 4.5 December 2016), Table 1 below provides the HRA screening assessment of the policies included. Green shading in the final column indicates that the policy has been screened out from further consideration due to the absence of any mechanism for an adverse effect on designated sites alone. In combination impacts may still require further consideration. Orange shading indicated that further assessment is required since a pathway of impact potentially exists that cannot be screened out at this point.

Table 1. Screening of Neighbourhood Plan Policies

HABITAT REGULATIONS ASSESSMENT OF THE: BUCKLAND MONACHORUM NEIGHBOURHOOD PLAN (DRAFT 4.5 DECEMBER 2016)

Policy	Policy Description	HRA Implications
Residential Development Policy 1: RD1 - Meeting our housing need	The Parish's future housing need for the period of the Plan will be met by development on two sites; one at Buckland Monachorum and one at Yelverton and the relevant Settlement Boundaries extended to encompass these sites (as indicated at Annexes K(i) and K(ii)). Proposals to build homes suited to young families at Buckland and homes specifically suited to more elderly residents seeking to downsize at Yelverton will be actively supported.	<p>Potential HRA implications.</p> <p>This policy provides for 24 new dwellings within the Plan area during the Plan period at two settlement boundaries, these are:</p> <ul style="list-style-type: none"> • Buckland Monachorum • Yelverton <p><i>The site allocations themselves are discussed further in Table 2. Alone, this policy can be screened out due to the very small quantum of growth expected on these two sites, but the following in-combination impact pathways require further consideration:</i></p> <ul style="list-style-type: none"> • <i>Recreational pressure</i> • <i>Hydrological pathways</i> • <i>Atmospheric pollution</i> <p>This is therefore discussed further in the 'in combination' section.</p>
Residential Development Policy 2: RD2 - Windfall	Applications for windfall development within already developed areas in the Parish will be supported provided they meet the following criteria: (a) they are within existing settlements rather than in the open countryside (b) they do not encroach on land separating villages (c) they are in keeping with adjacent properties and maintain the area's character (d) they do not conflict with the other policies in the Plan.	<p>Potential HRA implications.</p> <p><i>Alone, this policy can be screened out, but the following in-combination impact pathways require further consideration:</i></p> <ul style="list-style-type: none"> • <i>Recreational pressure</i> • <i>Hydrological pathways</i> • <i>Atmospheric pollution</i> <p>This is therefore discussed further in the 'in combination' section.</p>
Residential Development Policy 3: RD 3 - Broad mix of housing type	New housing developments (three houses or more) must provide a mix of housing types. Where practicable and viable, two thirds of housing built on the Buckland site should be starter homes and two thirds of the homes built on the Yelverton site homes suitable for older people. Both these sites are shown at Annex K (and see Policy RD1 above)	<p>No HRA implications.</p> <p>This is a development management policy relating to types of houses. It does not identify any type, location or extent of development (other than they should be starter homes or for older people).</p> <p>There are no impact pathways present.</p>
Residential Development Policy 4: RD4 - Affordable housing	The proposed development of affordable homes at Briar Tor, Yelverton, for which planning approval has been granted, will be actively supported. Other proposals for affordable housing within the Parish, across the NP period will be required to be supported by up to date housing need survey information and designed to meet identified local housing needs.	<p>No HRA implications.</p> <p>This is a residential policy relating to affordable housing. It does specify type of development, extent or area. (other than that it should be "affordable").</p> <p>There are no impact pathways present.</p>

HABITAT REGULATIONS ASSESSMENT OF THE: BUCKLAND MONACHORUM NEIGHBOURHOOD PLAN (DRAFT 4.5 DECEMBER 2016)

<p>R e s i d e n t i a l Development Policy 5: RD5 - Design</p>	<p>The NPPF requires all new development to be sustainable. In order to achieve this, applicants need to demonstrate how sustainability has been addressed in any application and proposals conforming to the Building of Life criteria (at Annex J) will be actively supported with particular focus falling on the need for safe access linking such development to local services.</p>	<p>No HRA implications.</p> <p>This is a residential development policy relating to new development. It does not identify any type, location or extent of development.</p> <p>There are no impact pathways present.</p>
<p>E c o n o m i c Development Policy 1: ED1 - Meeting the E c o n o m i c Development need</p>	<p>Economic Development will be supported provided it meets the following criteria:</p> <ul style="list-style-type: none"> (a) it can demonstrate an ability to provide local employment opportunities. (b) (b) it does not constitute Major Development within the AONB unless supported by Exceptional Circumstances tests as set out in para 116 of the NPPF. (c) (c) it is subject to a satisfactory traffic assessment (d) (e) the proposed business use is appropriate to a rural location (e) (f) it complies with the other Policies in the NP 	<p>No HRA implications.</p> <p>This is an economic policy relating to local employment. It does not identify the type, scale or extent of development it just discusses the criteria that will be planned to test the acceptability of proposals.</p> <p>There are no impact pathways present.</p>
<p>E c o n o m i c Development Policy 2: ED2 - Broadband</p>	<p>New development will only be permitted where provisions are made for High Speed Broadband (in excess of 24Mb/s) to each premises (business or residential).</p>	<p>No HRA implications.</p> <p>This is an economic policy relating to high speed broadband. It does not identify the type or extent of development.</p> <p>There are no impact pathways present.</p>
<p>E c o n o m i c Development Policy 3: E D 3 - Redevelopment of employment to non- employment use</p>	<p>Proposals for the redevelopment or change of use of land or buildings from employment to non-employment uses will only be supported where:</p> <ul style="list-style-type: none"> (a) It can be demonstrated that the existing use is no longer economically viable AND (b) (b) The site has been marketed at a reasonable price for at least 12 months and in an appropriate manner and no other suitable employment or service trade uses or interest has been expressed OR (c) (c) It can be demonstrated that employment use of the site is detrimental to the living conditions of residents or unacceptable in terms of impact on the built or landscape character of the Parish OR (d) (d) Permitted Development Rights allow for such changes 	<p>No HRA implications.</p> <p>This is an economic development policy relating to change of land use. It does not identify location, scale or extent of development, nor does it commit to a particular type (other than that it would from employment to non-employment uses). It just discusses the criteria that will be planned to test the acceptability of proposals.</p> <p>There are no impact pathways present.</p>

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<p>E c o n o m i c Development Policy 4: ED4 - Brownfield Sites</p>	<p>Development on land previously developed to stimulate the economy will be supported ahead of similar proposals for green field sites.</p>	<p>No HRA implications.</p> <p>This is an economic development policy relating to the principle of developing on previously developed land before greenfield sites. It does not identify location or extent of development, nor does it commit to a particular type.</p> <p>There are no impact pathways present.</p>
<p>Environmental Policy 1: E1 - Heritage</p>	<p>Development will not be permitted where it would adversely impact on sites of historic significance. DNP and AONB policies provide protection and while the NP does not advocate additional policies in this area, it will vigorously re-enforce those of the two LAs.</p>	<p>No HRA implications.</p> <p>This is an environmental policy relating to protection of sites of historic significance.</p> <p>There are no impact pathways present.</p>
<p>Environmental Policy 2: E2 - Local Character</p>	<p>New development must contribute to the local character by retaining a sense of place appropriate to its location and be able to demonstrate conformity with the relevant Landscape Character Assessments (at Annex C). Development proposals must be designed to retain, or where appropriate, replace, dry stone walls, trees and hedgerows and building materials should, wherever practicable conform to the guidance provided by both Local Authorities.</p>	<p>No HRA implications.</p> <p>This is an environmental policy relating to the protection of local character.</p> <p>There are no impact pathways present.</p>
<p>Environmental Policy 3: E3 - Climate Change</p>	<p>The Plan encourages the development of alternative sources of energy provided that:</p> <p>(a) The siting scale and design of the energy generating infrastructure is appropriate to the surroundings and is as close as possible to the building it serves.</p> <p>(b) Adjoining users are not adversely impacted in terms of noise, vibration or electro-magnetic radiation.</p> <p>(c) The energy generating equipment is removed as soon as reasonably practical once it is no longer used for energy generation.</p>	<p>No HRA implications.</p> <p>This is an environmental policy relating to alternative energy sources. It does not specify type of development, extent or area (other than that it should be in a place appropriate to its location be close to the new building). It just discusses the criteria that will be planned to test the acceptability of proposals.</p> <p>There are no impact pathways present.</p>
<p>Environmental Policy 4 : E4 - Flood risk</p>	<p>Any new development (economic or residential) must ensure and demonstrate that the risk of flooding to low lying settlements (particularly Buckland and Milton Combe) suffer no consequential increase in flooding risk and where possible help to alleviate that risk..</p>	<p>No HRA implications.</p> <p>This is an environmental policy relating to flooding</p> <p>There are no impact pathways present.</p>
<p>Environmental Policy 5: E5 - Recreation & Tourism</p>	<p>Development which improves the provision of, or access to, recreational sites will be actively supported. Infrastructure which encourages tourism to the area will be supported provided it does not impact adversely on residents.</p>	<p>No HRA implications.</p> <p>The context of this policy indicates that this is a reference to provision of recreational sites and encouragement of tourism within Buckland Monachorum parish. Since the parish contains no European sites this specific policy can be screened out.</p> <ul style="list-style-type: none"> • The Joint Local Plan contains policies regarding greenspace provision and tourism across the Local Plan area and those have been subject to their own HRA.

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Services Policy 1: S1 - Transport	Development which restricts the access of public transport to rural locations will not be supported. Conversely, any new development must include provision for access by public transport.	No HRA implications. This is a services policy relating specifically to public transport. It does not identify any location, type or quantum of development and in general improved provision of/access to public transport is positive for air quality. There are no impact pathways present.
Services Policy 2: S2 - Car Parking	Any proposed development, residential or economic, must meet the national standard for parking provision such that open spaces are not compromised by a lack of parking. The removal of parking facilities without adequate provision elsewhere, both public and private, will be strongly resisted.	No HRA implications. This is a services management policy relating to parking provisions. It does not identify any location, type or quantum of development. There are no impact pathways present.
Services Policy 3: - S3 - Footpaths & cycle routes	The Plan supports the provision of footpaths, cycle paths provided they do not have an adverse impact on the local environment, economy or residential amenities. Proposals for development must give consideration to the provision of footpaths with particular attention to facilities suitable for less mobile residents.	No HRA implications. This is a services management policy relating to parking provisions. It does not identify any location, type or quantum of development. In general, improved footpaths and cycle paths are beneficial for air quality. There are no impact pathways present.

Table 2 undertakes screening of the two site allocations identified in policy RD1 (Meeting our Housing Need).

Table 2. Screening of Site Allocations Identified in the Neighbourhood Plan

Settlement of Allocation	Number of dwellings	Distance to European Designated Sites	HRA implications
Buckland Monachorum	24 dwellings to be delivered between these two site allocations. No further details are provided in the Neighbourhood Plan as this will be determined as planning applications are devised.	5.9km from South Dartmoor Woods SAC (Shaugh Prior Woods SSSI); 9.0km from Dartmoor SAC; 3.1km from Plymouth Sound and Estuaries SAC and Tamar Estuaries Complex SPA	Alone this site allocation will not result in likely significant effects upon European designated sites due to the small number of dwellings and the distance from the European sites. However in combination effects require consideration.
Yelverton		3.5km from South Dartmoor Woods SAC Shaugh Prior Woods SSSI); 5.5km from Dartmoor SAC; 5.2km from Plymouth Sound and Estuaries SAC and Tamar Estuaries Complex SPA	Alone this site allocation will not result in likely significant effects upon European designated sites due to the small number of dwellings and the distance from the European sites. However in combination effects require consideration.

Table 1 identifies that all policies could be screened out from having linking impact pathways to European designated sites when considered alone. This is due to the small number of policies that promote development, the very small quantum of development that is allocated in the Plan (24 dwellings) and the distance of these allocations from the nearest sensitive European sites (3-6km). However, in combination impacts as a result of policies RD1 (Meeting our housing need) and RD2 (Windfall), require further discussion of their potential for likely significant effects 'in combination'. Impacts that require further consideration are:

- Recreational pressure;
- Hydrological impacts (both water quantity and water quality); and
- Atmospheric pollution.

It is these impact pathways that are discussed in the subsequent chapter.

5. In Combination Assessment

5.1. Recreational Pressure

Whilst the Plan is identified to provide a small quantum of new dwellings in itself (24 in total), this impact needs to be considered in combination with projects and plans provided within neighbouring Authorities as follows:

- The Pre-Submission Plymouth and South West Devon Joint Local Plan (2014-2034) provides for 26,700 new dwellings during the Plan Period (19,000 new homes to be delivered within the Plymouth, and 7,700 located within Thriving Towns and Villages (including 1,294 as windfall));
- Dartmoor National Park Local Development Framework Core Strategy sets an indicative level of Development within the National Park of 50 dwellings per annum (i.e. 1,000 dwellings during the Plan Period; to 2026); and
- The adopted (2016) Cornwall Local Plan provides for a minimum of 52,500 new dwellings during the Plan period (to 2030). Of note are the 1,430 new dwellings to be provided within Caradon CNA (i.e. a 9% increase in housing stock)

Table 1 identifies that the following Neighbourhood Plan policies have potential to link to the above European designated sites via increased recreational pressure in combination with other projects and plans:

- Residential Development Policy 1: RD1 - Meeting our housing need (provides for 24 new dwellings)
- Residential Development Policy 2: RD2 – Windfall (provides for an unspecified quantum of windfall dwellings)

Chapter 3 identified that the following European designated sites have potential to be vulnerable to recreational pressure:

- Plymouth Sound and Estuaries SAC; and
- Tamar Estuaries Complex SPA

Policy RD1 of the Neighbourhood Plan provides for two site allocations (identified in Table 2 and Appendix A, Figure A1) that will provide for 24 new dwellings. These are situated within Buckland Monachorum and Yelverton. Table 2 identifies that the Buckland Monachorum site allocation is located 3.1km from the Plymouth Sound and Estuaries SAC and the Tamar Estuaries Complex SPA and 9.0km from Dartmoor SAC; whilst the Yelverton site allocation is located 5.2km from the Plymouth Sound and Estuaries SAC and the Tamar Estuaries Complex SPA, and 5.5km from Dartmoor SAC.

5.1.1. Plymouth Sound and Estuaries SAC and the Tamar Estuaries Complex SPA

The SPA is designated for its over wintering and passage birds. It is designated for a range of habitats and species which are specialist within the area and both are identified as being sensitive to recreational pressure. The Site Improvement Plan for these sites¹² identifies that *'A range of activities including public access to the foreshore, recreational boat use, anchoring and diving, which are likely to increase, have the potential to cause disturbance or direct impact including shore dock, birds and Allis shad. Damage through anchor usage on Eel grass beds and reef features has the potential to be an issue. Surveys of reef sites within the site have shown significant quantities of angling debris which has the potential to affect the feature through smothering and affecting the growth of reef species.'*

To support the Joint Local Plan and under the Duty to Cooperate the local authorities around the SAC and SPA (Plymouth City Council, Cornwall Council, South Hams District Council and West Devon Borough Council) have undertaken a study into recreational pressure at these sites. This was delivered in partnership with Tamar Estuaries Consultative Forum (TECF) the body that manages the SPA and SAC.

The study investigated the following:

- A sensitivity analysis assessed the sensitivity of designated features of the designated sites to recreational activities to determine which are most at risk; and

¹² Natural England (2010) Site Improvement Plan Plymouth Sound and Tamar Estuary <http://publications.naturalengland.org.uk/file/5305007922479104> [accessed 02/06/2017]

- Visitor surveys undertaken between March and December 2016 recorded activities undertaken, mode of transport used and distance travelled (i.e. the Zone of Influence for recreational pressure).

The study found that recreational users of the designated sites were predominantly local to Devon and Cornwall (87% of visitor groups in the on-site survey and 82% on online survey). A seasonal pattern was apparent with an increase in non-local visitors during the summer months. The most popular terrestrial activities included walking, dog walking and outing with family; whilst the most popular water based activities were canoeing/kayaking, angling, sailing and swimming.

The study identified that the 'Zone of Influence' for recreational activity for the core visitor groups was 12.3 km for the SAC and 12.1 km for the SPA, and as such as 12 km strategic Zone of Influence has been adopted. The entirety of Buckland Monachorum is located within 12 km of the Plymouth Sound and Estuaries SAC and the Tamar Estuaries Complex SPA (even at its furthest point the Parish is located 6.5km from the SAC and 6.6km from the SPA), and as such residential development within this authority has the potential to contribute to 'in combination' increased recreational pressure within these designated sites and have a likely significant effect on these sites.

The Neighbourhood Plan area is split between two local authorities, West Devon Borough Council (WDBC) and the Dartmoor National Park Authority (DNPA). The site allocation in Buckland Monachorum is located in WDBC, whilst the Yelverton site allocation is located with DNPA and as such should be in general conformity with the respective overarching Plans.

Neither of the site allocations provided within the Plan are provided as strategic site allocations within either overarching Plan, and as such to fall within the strategic quantum of housing previously subject to HRA at the overarching plan level the provision of the 24 new dwellings would need to be included in the windfall allocation of these overarching plans. In the case of WDBC the emerging Joint Local Plan provides for a Sustainable Villages allowance of 720 dwellings (according to Figure 3.3 of the Joint Local Plan) specifically to allow for site allocations made in Neighbourhood Plans. The DNPA Core Strategy does not make site allocations; all 1,000 new dwellings will essentially be provided either by existing planning permissions or via 'windfall'. It can therefore be reasonably concluded that the level of growth identified in the Neighbourhood Plan has been allowed for in the overarching HRAs of the two relevant Local Plans/Core Strategies. Since both site allocations are too far from any European sites to result in likely significant effects in themselves, it is only as part of the total Local Plan growth that they are relevant.

The HRA of the Joint Local Plan examined the total quantum of housing in that Local Plan and identified the following avoidance mechanisms necessary to protect the Plymouth Sound and Estuaries SAC and the Tamar Estuaries Complex SPA:

- 'Policy SPT13: European Protected Sites – mitigation of recreational impacts from development.

Mitigation measures for recreational impacts on European Sites will be required where development is proposed within the identified zones of influence around those European Sites that are vulnerable to adverse recreational impacts. Residential development, student and tourist accommodation within these zones of influence will be required to provide for appropriate management, mitigation and monitoring on site, and/or financial contributions towards off site mitigation and management. This will need to be agreed and secured prior to approval of the development. Mitigation measures will include:

1. *On-site access and management.*
2. *Off-site provision of suitable alternative recreational facilities.'*

Supporting text to the policy states:

'3.102: All applications within the zone of influence will be screened for Likely Significant Effects. A contribution to management is likely to be required for all European sites listed above, but the study will update the final zones of influence and the types of mitigation required.

3.103: Mitigation measures could potentially include:

- *On-site management of recreational infrastructure, visitor access and visitor management.*
- *Coordination of different activities which have the potential to impact on the features of the European sites.*

3.104: Delivery will be through the Tamar Estuaries Consultative Forum, as the existing management structure that effectively brings together the competent bodies for the waters of Plymouth Sound and the Tamar Estuaries, to which the local authorities of the Plan Area contribute.

3.105: *Monitoring of the policy will be aimed at assessing the impacts of new development on the European sites to establish a better evidence base to inform future refinement of existing Management Plans and mitigation measures.*

Paragraph 3.10 of the Plan states that the Neighbourhood Plan will be in '*general conformity*' with the most recently adopted Local Plan (and this is in any case a requirement even if it wasn't specifically mentioned). As already mentioned even a Local Plan that has not yet been adopted is still a material consideration as per the NPPF. The 12 km recreational Zone of Influence and provision of strategic avoidance measures as provided by Joint Local Plan Policy SPT13: European Protected Sites – mitigation of recreational impacts from development) this is also of relevance and used to inform the Neighbourhood Plan. Clearly, a strategic solution is required to recreational pressure issues and the Neighbourhood Plan cannot address these by itself.

As such, provided that the Neighbourhood Plan accords with the Joint Local Plan with regard to the need for developments to contribute to provision of strategic recreational mitigation and avoidance measures then the Neighbourhood Plan's recreational contribution can be screened out from resulting in likely significant effect alone and in combination.

Since the Local Plan is not yet adopted, for robustness it is recommended that the requirement for developments to contribute to avoidance and mitigation measures as provided within Joint Local Plan policy SPT13 is provided for either within Plan policy or at least clarified in supporting text.

The HRA of the Joint Local Plan was able to screen out likely significant effects of growth on the other European sites and since a suitable quantum of growth to cover the Neighbourhood Plan allocations is already included in that Joint Local Plan the conclusion of the Joint Local Plan HRA can also be applied to the Neighbourhood Plan.

5.2. Hydrological Impacts

Table 1 identifies that the following Neighbourhood Plan policies have potential to link to the above European designated sites via changes to hydrological conditions in combination with other projects and plans:

- Residential Development Policy 1: RD1 - Meeting our housing need (provides for 24 new dwellings)
- Residential Development Policy 2: RD2 – Windfall (provides for an unspecified quantum of windfall dwellings)

Chapter 3 identified that the following European designated sites have potential to be vulnerable to changes in hydrological conditions (water quality: point sources and diffuse sources; and water quantity: changes in abstraction):

- Plymouth Sound and Estuaries SAC;
- Tamar Estuaries Complex SPA; and
- Dartmoor SAC.

5.2.1. Water Quantity

The HRA of the Joint Local Plan screened out impacts relating to changes in water quantity. This was because development provided in the Joint Local Plan would not result in a need for increased abstraction from the Plymouth South and Estuaries SAC or the Tamar Estuaries Complex SPA. The HRA considered further impacts of water volume changes upon Dartmoor SAC features (of note blanket bogs and Atlantic salmon). It identified that the vulnerability to changes in hydrological conditions of the blanket bogs was as a result of '*historic and current land management and drainage practices*' and as such are not linked to the Joint Local Plan or housing development generally. Additionally the impact of changes in water quantity as a result of the Joint Local Plan alone and in combination with other projects and plans was screened out based on the fact that the South West Water Resource Management Plan (2014) identified that there will be a significant surplus of water supply over demand plus necessary headroom until at least 2050. Further the Environment Agency's Review of Consents process examines abstraction licences to avoid adverse impacts upon European designated sites. Historically abstractions had been impacting upon the Dartmoor SAC, however the capacity of these Licenses have been reviewed and reduced accordingly and are subject to monitoring. As such it was concluded that the Joint Local Plan would not result in likely significant effects upon a European designated sites as a result of changes to water quantity.

Since a suitable quantum of growth to cover the Neighbourhood Plan allocations is already included in that Joint Local Plan the conclusion of the Joint Local Plan HRA can also be applied to the Neighbourhood Plan.

5.2.2. Water Quality

Whilst the likely contribution from development provided within the Plan is small and unlikely to result in a likely significant effect alone, when looked at in combination with other projects and plans, this impact pathway could impact upon the integrity of European designated sites.

Changes in water quality from point source inputs (such as licenced Waste Water Treatment Work discharge and factories), diffuse pollution and unplanned pollution events can impact upon European designated sites. The HRA of the Joint Local Plan enabled impacts upon Dartmoor SAC to be screened out from further consideration as there was no linking impact pathway between the pathway and the Joint Local Plan. However, impacts pathways linking the Plymouth Sound and Estuaries SAC and Tamar Estuaries Complex SPA to the Joint Local Plan could not be screened out on first analysis due to the proximity of Plymouth to these designated sites and the potential for new residential, employment and industrial development to result decreased water pollution within these designated sites. They were therefore examined further.

5.2.3. Plymouth Sound and Estuaries SAC and the Tamar Estuaries Complex SPA

The following features have potential to be vulnerable to changes in water quality: avocet (non breeding), subtidal sandbanks, estuaries, shallow inlets and bays, Atlantic salt meadows, allis shad; and shore dock.

The Site Improvement Plan¹³ for these sites states:

'Water pollution can come from a range of sources, including diffuse pollution from agriculture practices around the estuary, point source from sewage outlets and historic mining sites and major pollution incidents from industry located within the river catchment. Contaminants are also locked into sediments within the estuary that if disturbed can be released into the water column. Water pollution would potentially cause nutrient enrichment which can increase the quantity of nuisance algae potentially smothering reef features and reducing available oxygen causing fish kills. Chemical and oil pollution would directly impact all features through toxicity, smothering and impact on food availability. At present the Environment Agency monitor levels of TBT in the sound, but other indicators are not measured throughout the estuary. Therefore, it is important to gain sufficient information on other indicators to conclude what levels of pollution are present within the site, the potential causes, the impact on features and possible solutions.'

A report by Langston et al¹⁴ noted that *'parts of the system, notably the upper estuaries, are subject to nutrient enrichment. Although the majority of nutrient inputs in the system may be due to diffuse sources such as agricultural run-off, sewage discharges constitute additional loading and result in chronic contamination of the affected areas, and nutrient associated water quality problems. For example low levels of dissolved oxygen have occurred periodically in the upper Tamar and may be responsible for salmonid deaths.'* Langston et al also note that the introduction of hydrocarbons to the estuary environment through road run off & industrial sources (oil depot, dockyard discharges, sediments) as another 'principal area of concern' affecting quality of the SAC/SPA. The EA Review of Consents Stage 3 found six discharge permissions could not be concluded to be having no likely significant effects on the SAC – these all related to levels of metals and non-metallic toxins. Three of the permissions related to STWs in Plymouth. At Stage 4 of the RoC, the preferred approach was to revoke consent conditions for dieldrin at Plymouth Central, revoke TBT consent conditions at Plymouth (Radford) and modify consents (remove headroom) at Plymouth Ernesettle in order to reflect present performance. The consent change approach was also recommended for Torpoint STW. Adjustment of consents was also required for one industrial and one quarry-related permission. The HRA of the Joint Local Plan identified that all STW and WWTW within Plymouth, South Hams and West Devon would receive new residential development within their catchments as a result of the Joint Local Plan.

As outlined in the HRA of the Joint Local Plan, the investment programme currently being undertaken by South West Water will enable the level of new residential development as provided by the Joint Local Plan to be

¹³ Natural England (2010) Site Improvement Plan Plymouth Sound and Tamar Estuary <http://publications.naturalengland.org.uk/file/5305007922479104> [accessed 06/06/2017]

¹⁴ Langston, W.J., Chesman, B.S., Burt, G.R., Hawkins, S.J., Readman, J. and Worsfold, P. (2003) Characterisation of the South West European Marine Sites. Plymouth Sound and Estuaries cSAC, SPA. Occasional Publications. Marine Biological Association of the United Kingdom (9) 202p

accommodated without increasing existing discharge consent volumes. However, the Development Coordinator at South West Water's response to the consultation of the Joint Local Plan (2016) stated that '*South West Water has no comment at present although proposed sites for residential/commercial use will require potential developers to approach ourselves in respect of the individual site they are considering for development to review available capacity within our infrastructure*'. It should be noted that infrastructure capacity covers all aspects of wastewater removal and treatment including pipework connecting development sites to the relevant wastewater treatment works. This statement therefore simply means that in each case applicants for planning permission will need to confirm the adequacy of pipework and all other infrastructure with South West Water.

Since a suitable quantum of growth to cover the Neighbourhood Plan allocations is already included in that Joint Local Plan the conclusion of the Joint Local Plan HRA can also be applied to the Neighbourhood Plan.

Policies within the Joint Local Plan make specific reference to a requirement for any new or improved sewage/ water treatment infrastructure to be in place before housing (or other) development takes place to ensure no adverse impact on European Sites to which the Neighbourhood Plan will accord. **Given this it is recommended that this same requirement is introduced to the Neighbourhood Plan.**

5.3. Atmospheric Pollution

Atmospheric pollution has potential to impact upon European designated sites such as Dartmoor SAC, Dartmoor Woods SAC, Tamar Estuaries Complex SPA and Plymouth Sound and Estuaries SAC. At its closest Tamar Estuaries SPA is located immediately adjacent to the Neighbourhood Plan area boundary. The HRA of the Joint Local Plan considered that the Plymouth Sound and Estuaries SAC at the Tamar Bridge (A38) (namely impacting on the immediately adjacent mudflat habitats) could be subject to impact from atmospheric pollution from increased traffic flows as a result of additional traffic from new development provided by the Neighbourhood Plan. To support the HRA traffic modelling was undertaken along with an air quality assessment to determine potential changes in atmospheric conditions as a result of the Joint Local Plan alone and in combination with development planned within neighbouring authorities. Following initial modelling, Plymouth City Council commissioned WSP Parsons Brinckerhoff (in 2017) to undertake additional modelling of changes to traffic flows and traffic speeds as result of the development allocations in the Joint Local Plan at Tamar Bridge (A38).

Analysis of the modelling allowed the HRA of the Joint Local Plan to conclude that there would be no adverse effect from increased nitrogen deposition upon Qualifying Features of the SAC or SPA as a result of development provided within the Joint Local Plan.

Further to this the nearest settlement within the Neighbourhood Plan area is located 3.1 km from the SPA. According to the Department of Transport's Transport Analysis Guidance and as discussed in the Plymouth and South West Devon Joint Local Plan, "*Beyond 200m, the contribution of vehicle emissions from the roadside to local pollution levels is not significant*". As such the location of the planned level of development provided within the Plan is far beyond 200m from a European designated site and far beyond the sphere of influence for the extent of development provided within the Plan.

Since a suitable quantum of growth to cover the Neighbourhood Plan allocations is already included in that Joint Local Plan the conclusion of the Joint Local Plan HRA can also be applied to the Neighbourhood Plan.

6. Conclusions

The Likely Significant Effects test enabled all policies within the draft Buckland Monachorum Neighbourhood Plan to be screened out from impacting upon European designated sites alone. However further investigations were required in combination with other projects and plans of the following impact pathways:

- Recreational pressure
- Hydrological changes
- Air quality

To ensure that the Neighbourhood Plan does not result in likely significant effect upon European designated sites the following recommendations were made.

6.1. Recreational Pressure Relating to Plymouth Sound and Estuaries SAC and the Tamar Estuaries Complex SPA

Since the Local Plan is not yet adopted, for robustness it is recommended that the requirement for developments to contribute to avoidance and mitigation measures as provided within Joint Local Plan policy SPT13 is provided for either within Plan policy or at least clarified in supporting text.

6.2. Water Quality Relating to Plymouth Sound and Estuaries SAC and the Tamar Estuaries Complex SPA

Policies within the Joint Local Plan make specific reference to a requirement for any new or improved sewage/ water treatment infrastructure to be in place before housing (or other) development takes place to ensure no adverse impact on European Sites to which the Neighbourhood Plan will accord. Given this it is recommended that this same requirement is introduced to the Neighbourhood Plan.

Providing these recommendations are incorporated within the Neighbourhood Plan, it can be concluded that it will not impact upon the integrity of any European designated sites either alone or in combination.

A.Figures

B. 'Tiering' in Habitats Regulations Assessment

