



Habitats Regulations Assessment and Mitigation Strategy for the Greater Exeter Strategic Plan

European Site Sensitivity Analysis

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Summary

This report is the first of a series of reports that support the assessment of potential impacts on European wildlife sites arising from the emerging Greater Exeter Strategic Plan (GESP). The GESP will be a statutory planning document, providing strategic policy across local planning authorities of Exeter, East Devon, Mid Devon and Teignbridge. Footprint Ecology has been commissioned by the four local planning authorities to undertake the HRA, working with a steering group of planning and specialist officers from the four authorities and the GESP team.

The County Ecologist initially prepared a table of baseline information on the relevant European sites within 20km of the GESP boundary. This table included reference to a number of sources of information, including advice from Natural England, various research and evidence base documents and individual European site approaches currently in place to protect European site interest. This sensitivity table is needed to provide a methodology for screening broad areas of search for potential site allocations in the emerging GESP. This report therefore will inform the screening of the GESP for likely significant effects, but it does not function alone as the screening stage in the HRA.

This report provides a review of the sensitivity table, checking the methodology, refining and systematising the approach and looking for any inaccuracies or omissions. This has involved a review of all Site Improvement Plans (SIPs), European site conservation objectives and a check of the site specific supplementary advice available, a check of any relevant plans or mitigation approaches and a thorough check through the table to add relevant information based on Footprint Ecology's knowledge of the European sites.

The review and revision of the European site sensitivity table enabled the table to be trailed on potential site options, with discussions between the HRA steering group and Footprint Ecology to ensure that the table is performing as required.

This report provides a basis to inform emerging site options. The final update to this report was made in 2019, after trailing, in order to ensure that key matters for the HRA are highlighted to be taken forward into the HRA report.

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1. Introduction

Context

- 1.1 This report is the first of a series of reports that support the assessment of potential impacts on European wildlife sites arising from the emerging Greater Exeter Strategic Plan (GESP). The GESP is being prepared by the local planning authorities of Exeter, East Devon, Mid Devon and Teignbridge. Devon County Council is also a partner in the joint planning work. The GESP will be a statutory planning document, providing strategic policy across the four local planning authority areas and therefore forming the strategic part of each authority's Local Plan.
- 1.2 The GESP will include high level strategic policies for housing, economic growth, transport and the environment. It will also include some large-scale site allocations and infrastructure proposals. Each authority's Local Plan will also include individual authority development management policies, local level site allocations and any additional planning documents relevant to each local area, such as Supplementary Planning Documents and Neighbourhood Plans.
- 1.3 The four local planning authorities have recognised the importance of early commencement of Habitats Regulations Assessment (HRA) related work to support the preparation of the GESP. HRA is the step by step process of ensuring that a plan or project being undertaken by, or permitted by a public body, will not adversely affect the ecological integrity of a European wildlife site. Where it is deemed that adverse effects cannot be ruled out, a plan or project must not proceed, unless exception tests are met. This is because European legislation, which is transposed into domestic legislation and policy, affords European sites the highest levels of protection in the hierarchy of sites designated to protect important features of the natural environment.
- 1.4 The relevant European legislation is the Habitats Directive 1992¹ and the Wild Birds Directive 2009², which are transposed into domestic legislation through the Conservation of Habitats and Species Regulations 2017, as amended. These Regulations are normally referred to as the 'Habitats Regulations.' The legislation sets out a clear step by step approach for decision makers considering any plan or project. In England, those duties are also supplemented by national planning policy through the National Planning Policy Framework (NPPF). This national planning policy also refers to Ramsar sites, which are listed in accordance with the international Ramsar Convention. The NPPF requires decision makers to apply the same protection and

¹ Council Directive 92/43/EEC

² Council Directive 2009/147/EC

process to Ramsar sites as that set out in legislation for European sites. Formally proposed site, i.e. sites proposed for European designation and going through the designation process, and those providing formal compensation for losses to European sites, are also given the same protection. The HRA work for the GESP refers to all the above sites as 'European sites' for assessment purposes, as the legislation is applied to all such sites, either directly or as a result of policy.

- 1.5 The duties set out within the Habitats Regulations apply to any public body or individual holding public office with a statutory remit and function, referred to as 'competent authorities.' The requirements are applicable in situations where the competent authority is undertaking or implementing a plan or project, or authorising others to do so. The four local planning authorities preparing the GESP are therefore competent authorities.
- 1.6 The HRA work for the GESP will include a number of reports, which will be prepared over the period in which the GESP is being prepared and consulted on. HRA is an iterative process, undertaken alongside and informing the development of a plan. The various strands of work being undertaken as part of the HRA will include this report on a methodology for screening potential site allocations, a HRA of the draft GESP, and a mitigation strategy for avoiding and minimising any potential impacts on European sites that may arise as a result of the GESP.
- 1.7 Footprint Ecology has been commissioned by the four local planning authorities to undertake the HRA work, and is working with a steering group of planning and specialist officers from the four authorities and the GESP team. Other external partners are also involved in the work, particularly in the stakeholder workshop. The commission also includes visitor survey work at key European sites to inform the assessment.
- 1.8 This work progresses from earlier HRA and mitigation strategy work for the currently adopted Local Plans. This includes a strategic mitigation scheme in place for the Exe Estuary SPA/Ramsar site, Dawlish Warren SAC, East Devon Pebblebed Heaths SAC and East Devon Heaths SPA.

2. European Site Sensitivity analysis

- 2.1 The County Ecologist initially prepared a table of baseline information on the relevant European sites within 20km of the GESP boundary. This table (drafted in May 2017) included reference to a number of sources of information, including advice from Natural England, various research and evidence base documents and individual European site approaches currently in place to protect European site interest.
- 2.2 This sensitivity table is needed to provide a methodology for screening broad areas of search for potential site allocations in the emerging GESP. This report will inform the screening of the GESP for likely significant effects, but it does not function alone as that screening stage in the HRA. This analysis is for information gathering purposes only. It does not assess any potential impact, but rather provides a collation of information to inform the HRA of the GESP.
- 2.3 For the first step of this contract Footprint Ecology has been asked to review the sensitivity table, checking the methodology, refining and systematising the approach and looking for any inaccuracies or omissions. This has involved a review of all Site Improvement Plans (SIPs), European site conservation objectives and a check of the site specific supplementary advice available, a check of any relevant plans or mitigation approaches and a thorough check through the table to add relevant information based on Footprint Ecology's knowledge of the European sites.

Revising the sensitivity table

- 2.4 The following points set out the steps taken to revise the draft sensitivity table:
- The central column has been reformatted to provide a more consistent and easy to follow checklist for each European site, showing which impact pathways are and are not relevant, what information is currently available, and the status of that information.
 - Where it appears that potentially relevant impact pathways have been omitted, we have added these have been added to the table.
 - All relevant SIPs have been checked, and the table now includes all actions from the SIPs which are relevant to the GESP.
 - Relevant information from the site specific supplementary advice to support the conservation objectives has been added.
 - The table has been expanded to collate references and comments under an 'Other information' heading. This has separated out the references and information from recommended screening actions, which are now in a new column, as per point below.
 - A new final column has been added to the table to clearly identify the recommended approaches for screening. Previously this was together with the underpinning evidence and other information that has informed the recommended approaches.

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- Sites listed in the original table as having been screened out have been moved to a list at the end of the tables.
- Further detail has been added in relation to impact pathways. The types of pathway referred to are explained in Table 1 below.
- An explanation of the codes and text colours added to the table is provided in Table 2 below.

Table 1: Impact Pathways

Pathway	Explanation
Direct loss of interest feature	Direct, physical loss of European site habitat. Mortality of fauna from collision (e.g. traffic, wind turbines)
Fragmentation/ Isolation	Development around a European site which causes site to become more isolated in the landscape.
Loss of supporting habitat	Loss, deterioration or compromise of habitat outside a European site boundary that serves a supporting role for the European site, as reservoirs of mobile species migrating in and out of a European site or providing genetic exchange, as roosting, foraging or breeding sites for species present in SAC, or as stepping stones between European sites and equivalent habitat.
Recreation impacts	Effects on a European site caused by human use of site for recreational activities and their consequences, including walking, riding, sports, organised activities etc. Effects may include direct disturbance of species by people, dogs or vehicles, trampling, erosion, fire, vandalism, fly tipping.
Air Quality	Effects on a European site from altered local air quality. DMRB current guidance is to consider traffic impacts within 200m of a road. <i>May 2017 update – air quality issues need to be looked at and discussed with NE in light of Wealden v SSCLG – 20/03/2017 – this applies to wherever air quality is mentioned in this table.</i>
Water Quality	Effects on a European site from altered local water quality.
Water Availability	Effects on a European site from interruption, reduction or other interference of local hydrology, including groundwater, surface standing water or watercourses.
General urbanisation effects	Effects on a European site from nearby development, including light, noise, domestic cats, spread of invasive species, etc. Either adding to existing levels in urban areas or creating new issues in non-urban areas, for example affecting the ability of light sensitive species to navigate the landscape or deterring use of existing habitat/feeding/roosting sites.

Table 2: Codes and text colours for the European site sensitivity analysis tables

Codes/colours	Explanation
Red text	Mitigation not possible / very difficult.
Amber text	Mitigation <i>may be</i> possible, but needs to be assessed at site selection stage in terms of viability, etc.
Yellow text	Mitigation is considered possible.

3. European Site Sensitivity Analysis Table

3.1 Table 3 provides the reviewed and revised sensitivity analysis. The table includes all sites within the GESP area and within 20km of the GESP border. The table is supported by a GIS layer prepared by the GESP team, which maps some of the key zones referred to within the table. Table 4 lists the sites screened out by the County Ecologist in the initial draft of the sensitivity analysis table.

Recommended approaches to screening

3.2 The final column of the table sets out the recommended approaches to screening emerging GESP sites as either:

- Avoid – particular areas or distances need to be avoided for built development allocations.
- Flag – there is a risk that requires further consideration. This may be a need for more detailed information or a re-check pending further review.
- Discuss – there is a need for further discussion between the local planning authorities, County Ecologist, Natural England and Footprint Ecology in order to establish a position.
- Follow – current strategic mitigation is in place and needs to be followed. This will be developed for the longer term as part of the GESP, but the principles are likely to still apply.

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Table 3: European site sensitivity analysis table

Site details	Features for which site is designated	Analysis of potential impact pathways			Relevant references and data sources	Recommended approach to addressing impacts
		Impact pathway	Relevance to site	Mitigation potential		
BEER QUARRY & CAVES SAC SY215892 West of Seaton on East Devon coast	Annex I Habitats None	<i>Direct loss</i>	Direct loss of SAC roost	Red	Relevant Site Improvement Plan refs: <ul style="list-style-type: none"> Action 1A: The need for an access strategy to resolve recreational issues. This requires appropriate management of cave entrances and is not an impact related to development. Action 5A: The need for planning guidance covering surrounding landscape to work alongside agri-environment scheme targeting to enhance as well as protect habitat Other relevant information: <ul style="list-style-type: none"> Footprint Ecology suggests a 400m avoidance zone for this site to avoid impacts from urban effects, especially cats. NE suggested that this should be yellow. To discuss further if any development is proposed in this area. Bat guidance for SAC is being developed by East Devon AONB, LPAs, NE and Dr FM, Exeter University. (South Devon equivalent guidance suggests 4km radius zone around roosts.) Draft SAC sustenance zones have been obtained from EDAONB. Not clear if LHB roosts outside SAC are functionally linked and should be included in SAC consultation zone. Contact for updates on the guidance is PY at East Devon AONB. 	Main issues are immediate disturbance effects from development taking place close by, and indirect impacts on bat foraging and commuting habitat if development takes place further away: <ul style="list-style-type: none"> Avoid - Any development locations coming within 400m of SAC boundary. Avoid - Use SAC bat sustenance zones data to identify and avoid areas of strategic foraging and commuting habitat in surrounding landscape, noting the potential for impacts on the zone from some distance outside (data is draft but precautionary approach taken unless updated) Flag - potential for impacts within a 4km radius of SAC, and review once sustenance zones agreed. Consider potential for inclusion in a strategic approach Flag - potential for impacts within a 4km radius of SAC, and connections between 4km zones: review once
	Annex II Species Hibernating Bechstein's bat <i>Myotis bechsteinii</i> (Primary reason for selection) greater horseshoe bat <i>Rhinolophus ferrumequinum</i> Lesser Horseshoe Bat <i>Rhinolophus hipposideros</i>	<i>Fragmentation/ Isolation</i>	Development could interrupt bat routes to supporting roosts and to foraging areas.	Amber		
		<i>Loss of supporting habitat</i>	Impacts on bat population due to effects on habitat outside SAC boundary, within the draft sustenance zone (loss and deterioration)	Amber		
		<i>Recreation impacts</i>	Disturbance from unauthorised access to caves	Yellow		
		<i>Air Quality</i>	No			

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Site details	Features for which site is designated	Analysis of potential impact pathways			Relevant references and data sources	Recommended approach to addressing impacts
		Impact pathway	Relevance to site	Mitigation potential		
		<i>Water Quality</i>	No		Any use of material to be checked with NE	<p>sustenance zones agreed.</p> <ul style="list-style-type: none"> • Discuss - TDC have been considering producing guidance/policy re turbines/PV and biodiversity, including mapping of sensitive zones. TDC would be happy to do this in collaboration with other LPAs. <p><u>HRA to consider whether mortality due to increased traffic may be a concern</u></p>
		<i>Water Availability</i>	No			
		<i>General urbanisation effects</i>	From development within 400m of the designated roosts and supporting roosts. Light pollution and potentially domestic cat predation affecting bat flyways, supporting roosts and foraging areas	<p>Yellow</p> <p>Amber</p>		

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Site details	Features for which site is designated	Analysis of potential impact pathways			Relevant references and data sources	Recommended approach to addressing impacts
		Impact pathway	Relevance to site	Mitigation potential		
<p>CULM GRASSLANDS SAC</p> <p>SS843214</p> <p>Several sites, the most relevant being Knowstone and Hare's Down adjacent to the A361 near Rackenford – just outside the GESP area</p>	<p><u>Annex I Habitats</u> Molinia meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinia caeruleae</i>); Northern Atlantic wet heaths with <i>Erica tetralix</i></p> <p><u>Annex II Species</u> Marsh fritillary butterfly <i>Euphydryas</i> (<i>Eurodryas</i>, <i>Hypodryas</i>) <i>aurinia</i></p>	<i>Direct loss</i>	Direct loss of SAC	Red	<p><u>Relevant Site Improvement Plan refs:</u></p> <ul style="list-style-type: none"> • Action 1A: Need for a Site Nitrogen Action Plan (means not yet determined) • Action 3A: Need for research into effects on SAC from drainage in surrounding land (via Devon WT) • Action 5A: <i>Investigate management to maintain a healthy Marsh fritillary meta-population on the SAC and associated areas.</i> <p><u>Other relevant information:</u></p> <ul style="list-style-type: none"> • Footprint aware of MF research being undertaken by Butterfly Conservation and Exeter Uni for the Pewsey Downs NNR – in 2017 SJ contacted NB (BC) who said - <i>Early days - using the Wiltshire SACs as a model but our intention is to use the models in other systems once they have been developed and tested.</i> • Air quality issues to be considered at site allocation stage. In 2016 NE advised adding a 200m buffer along the A361 where it passes through the SAC. The SAC itself is outside the GESP area. Supporting Marsh Fritillary sites will need to be 	<p>Main impact would be via air quality issues or loss of surrounding habitat patches which support satellite populations of Marsh Fritillary, or connecting habitat which enables movement between populations:</p> <ul style="list-style-type: none"> • Avoid - built development or traffic increases affecting known/potential (mapped) Marsh Fritillary sites on supporting habitat outside SAC. • Flag - any potential air quality impacts if allocations likely to lead to increased traffic close to supporting Marsh Fritillary sites. Link to Mitigation Strategies. • Flag - air quality impacts if development suggested for Tiverton area. • Flag - potential for hydrological effects in close proximity to SAC. <p>HRA to collate available data on <u>Marsh Fritillary use of supporting habitat through discussions with NE and DBRC, and to consider whether mortality due to increased traffic may be a concern.</u></p>
		<i>Fragmentation/ Isolation</i>	Potential impacts on the Marsh Fritillary populations on habitat fragments actually or potentially supporting the species within 10km of the SAC	Amber		
		<i>Loss of supporting habitat</i>	Potential impacts on corridors between these sites within 10km of the SAC	Amber		
		<i>Recreation impacts</i>	Potential for disturbance from increased short-stay visitors to car parks at	Yellow		

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Site details	Features for which site is designated	Analysis of potential impact pathways			Relevant references and data sources	Recommended approach to addressing impacts
		Impact pathway	Relevance to site	Mitigation potential		
			Knowstone – <u>NE advice to feed into HRA</u>		<ul style="list-style-type: none"> checked. <u>If development is proposed in the Tiverton area, work is required looking at how the North Devon and Torridge Local Plan HRA and Mid Devon District Council Local Plan Review HRA and Appropriate Assessment are considering air quality issues.</u> Some Marsh Fritillary habitats have been mapped using DBRC records, data may be old and out of date. Recommend establishing if development is proposed in this area before further mapping work progresses. 	<p><u>HRA air quality work will need to build on MDDC/NDC/TDC in-combination report which concluded no adverse effect on the integrity of the Culm SAC alone or in combination with other plans.</u></p> <p><u>HRA to look at Torridge local plan and working wetlands project for the Culm Grasslands</u></p>
	<i>Air Quality</i>	Potential impact on habitat and hence Marsh Fritillary populations due to nitrous oxide emissions from traffic	Amber			
	<i>Water Quality</i>	No				
	<i>Water Availability</i>	Allocations close to habitat fragments could impact on hydrology of mire/wetland sites	Amber			
	<i>General urbanisation effects</i>	No				

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		Impact pathway	Relevance to site	Mitigation potential		
DARTMOOR SAC SX590864 South of Okehampton, within National Park	<u>Annex I Habitats</u> Northern Atlantic wet heaths with <i>Erica tetralix</i> European dry heaths Blanket bogs Old sessile oak woods with <i>Ilex</i> and <i>Blechnum</i> in the British Isles <u>Annex II Species</u> Southern damselfly <i>Coenagrion mercuriale</i> Atlantic salmon <i>Salmo salar</i> Otter <i>Lutra lutra</i>	<i>Direct loss</i>	No		Relevant Site Improvement Plan refs: <ul style="list-style-type: none"> Action 2A: Partnership agreement on wildfire/arson Action 3A: Need for a Site Nitrogen Action Plan (means not yet determined) No actions relating to recreation Other relevant information: <ul style="list-style-type: none"> Footprint raised possible issue of disturbance to salmon spawning sites by canoes, paddlers but thought that this could be a localised issue. Impacts of trampling on habitats was reviewed in the TDC HRA and it was suggested that impacts are localised due to levels of recreation and extensive areas of habitat. Monitoring recommended. Fire risk and other land management issues associated with development were also mentioned. <u>For the HRA – check with RK re. salmon issue + recreational issues.</u> <u>Dartmoor are producing their Local Plan – need to ensure that HRAs are consistent. Evidence available (by</u>	Main impacts would arise from recreational disturbance from additional visitor traffic, on terrestrial and riverine features: <ul style="list-style-type: none"> Discuss – Need to have a consensus on localised recreation and disturbance of salmon spawning sites Discuss – need to evaluate recreational impacts in conjunction with TDC and DNPA’s HRA work. Flag - any potential air quality impacts if allocations likely to lead to increased traffic within 200m. HRA may need to look at multiple small contributions (In light of Wealden decision). Flag – potential for light pollution will need to be considered in terms of distance from site and nature of development.
		<i>Fragmentation/ Isolation</i>	No			
		<i>Loss of supporting habitat</i>	No			
		<i>Recreation impacts</i>	Recreational impacts on habitat; salmon and otter in rivers which link to the SAC; possible fire risk, nutrient enrichment and trampling	Yellow		
		<i>Air Quality</i>	Potential impact on habitat due to nitrous oxide emissions from traffic – enrichment of low fertility habitats and pollution directly killing lichens	Amber		
		<i>Water Quality</i>	Water quality impacts on migratory salmon and otter in rivers which link to SAC	Yellow		
<i>Water Availability</i>	Water availability impacts on migratory salmon and otter in rivers which link to SAC	Yellow				

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		<i>General urbanisation effects</i>	Light pollution may be an issue	Amber	<p><u>SWEEP team at Exeter University) - 'Population futures and Dartmoor National Park: Implications of development around the outskirts of Dartmoor for recreational use and management of access' (2018).</u></p> <ul style="list-style-type: none"> Air quality, water quality and recreational impacts issues to be considered at site allocation stage. 	<p><u>HRA to cross reference to Dartmoor NP plan and Recreation Futures work</u></p>
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Site details	Features for which site is designated	Analysis of potential impact pathways			Relevant references and data sources	Recommended approach to addressing impacts
		Impact pathway	Relevance to site	Mitigation potential		
<p>DAWLISH WARREN SAC</p> <p>SX984792</p> <p>At mouth of Exe Estuary on south coast</p>	<p><u>Annex I Habitats</u></p> <p>Humid dune slacks</p> <p>Shifting dunes along the shoreline with <i>Ammophila arenaria</i> (`white dunes`)</p> <p>Fixed dunes with herbaceous vegetation</p>	<i>Direct loss</i>	Direct loss of SAC	Red	<p>Relevant Site Improvement Plan refs: (SIP part of Exe Estuary document)</p> <ul style="list-style-type: none"> Action 5A: Visitor management planning being addressed through initiative led by Teignbridge DC. <p>Other relevant information:</p> <ul style="list-style-type: none"> At Nov 2016 meeting NE advised that this zone should remain amber due to unknowns in terms of recreational pressure. NE also suggested that the area from which 75% of visitors are drawn should be coloured amber as done in other parts of the country. Further discussion regarding the applicability of the existing <i>SE Devon European Sites Mitigation Strategy</i> to the 	<p>Impacts would relate to additional recreational disturbance from increased visitor pressure:</p> <ul style="list-style-type: none"> Avoid - any development locations coming within 400m of SAC boundary. Follow – the revised mitigation strategy if development allocations are proposed within 10km of SAC, assume a recreational impact, which will need to be assessed and mitigated for.
		<i>Fragmentation/ Isolation</i>	Possible loss of adjacent County Wildlife Site dune grassland habitat (providing genetic exchange with the SAC).	Yellow		
		<i>Loss of supporting habitat</i>	Possible loss of adjacent County Wildlife Site dune grassland habitat (providing genetic exchange with the SAC).	Yellow		
		<i>Recreation impacts</i>	Recreational impacts (trampling of dunes, urban effects etc). 10km risk zone (as per existing/ revised mitigation guidance)	Amber		

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(`grey dunes`) <u>Annex II Species</u> Petalwort <i>Petalophyllum ralfsii</i>	<i>Air Quality</i>	No - isolated from roads		GESP is required when more known about possible site allocation. Decisions to be informed by learning from other areas e.g. Thames Basin Heaths.
	<i>Water Quality</i>	No (although localised golf course management needs continual checking)		
	<i>Water Availability</i>	No (although localised golf course management needs continual checking)		
	<i>General urbanisation effects</i>	No		

Site details	Features for which site is designated	Analysis of potential impact pathways			Relevant references and data sources	Recommended approach to addressing impacts
		Impact pathway	Relevance to site	Mitigation potential		
EAST DEVON PEBBLEBED HEATHS SAC + EAST DEVON HEATHS SPA SY040868 East of Woodbury, East Devon	<u>Annex I Habitats</u> Northern Atlantic wet heaths with <i>Erica tetralix</i> ; European dry heaths	<i>Direct loss</i>	Direct loss of SAC/SPA habitat	Red	<u>Relevant Site Improvement Plan refs:</u> <ul style="list-style-type: none"> Action 4A/B: Visitor and access management plans for RSPB and Clinton land (in implementation) Action 5A: Need for a Site Nitrogen Action Plan (means not yet determined) Action 7A: investigation of impacts of groundwater abstraction (means not yet determined) <u>Other relevant information:</u> <ul style="list-style-type: none"> 400m avoidance zone for urban effects is in EDDC Local Plan. Potential foraging habitat has been mapped based on habitat type and data from RSPB. Footprint identified that nightjars recorded foraging 7km from nest 	Potentially complex set of direct and indirect impacts if allocations are within 10km of SAC/SPA boundary: <ul style="list-style-type: none"> Avoid - any development locations coming within 400m of SAC/SPA boundary. Flag - Mapped potential nightjar foraging habitat using the agreed 2km and 5km buffers. Discuss - Likely impacts if development proposed within 10km - consider capacity for existing Visitor Man Plan to accommodate added pressure. Discuss - Air quality and water quality issues are likely
		<i>Fragmentation/ Isolation</i>	Fragmentation of habitat from supporting sites.	Red		
		<i>Loss of supporting habitat</i>	Loss of functionally linked nightjar foraging and breeding habitat in a 2km radius.	Amber		
	<u>Annex II Species</u> Southern damselfly <i>Coenagrion mercurial</i>	<i>Recreation impacts</i>	Disturbance to nightjar and Dartford Warbler from trampling, fire risk, nutrient enrichment. 10km risk zone as per revised strategic mitigation guidance.	Yellow Amber		
	<u>Article 4.1</u> European nightjar					

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	<i>Caprimulgus europaeus</i> Dartford warbler <i>Sylvia undata</i> <u>Article 4.2</u> -	<i>Air Quality</i>	Impact on low nutrient habitats from nitrous oxide emissions from traffic	Amber	sites in Dorset but no more than 2km from sites in Thetford, presumably due to greater habitat availability. Initial HRA work therefore decided to set precautionary 5km and 2km buffers. • Recreational impacts – see discussion for Dawlish Warren above. Impacts need to be assessed in light of Visitor Man Plan for Pebblebeds (in implementation)	to be development specific, but an agreed position within the steering group should be sought. • Follow – the revised mitigation strategy if development allocations are proposed within 10km of SAC/SPA, assume a recreational impact, which will need to be assessed and .
<i>Water Quality</i>		Water quality impacts from inflowing surface water or watercourses affected by development.	Yellow			
<i>Water</i>		Alterations to hydrology	Yellow			

Site details	Features for which site is designated	Analysis of potential impact pathways			Relevant references and data sources	Recommended approach to addressing impacts
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		<i>Availability</i>	and risk of un-attenuated flows of surface water from development	Yellow	• <i>Air quality to be looked at further during site allocation stage. NE advised that SAC already exceeding annual critical loads and that they are producing site nitrogen action plans in 2018.</i> • NE suggested adding catchment map + looking at NE's Integrated Risk Zone mapping. To be done at site allocation stage in liaison with EA and NE	• mitigated for. • Flag – Any allocations within NE's Integrated Risk Zone, for checking with NE and EA. <u>HRA to look at NE's Integrated Risk Zone mapping, and potentially include a catchment map if available and consider whether</u>
		<i>General urbanisation effects</i>	From development within 400m Lighting could be an issue, but revised mitigation strategy excludes 400m.	Red		

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		Impact pathway	Relevance to site	Mitigation potential		
					<ul style="list-style-type: none"> • NE suggested screening out groundwater issue. 	<u>mortality due to increased traffic may be a concern.</u>

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Site details	Features for which site is designated	Analysis of potential impact pathways			Relevant references and data sources	Recommended approach to addressing impacts
		Impact pathway	Relevance to site	Mitigation potential		
EXE ESTUARY SPA SX981840	<u>Article 4.1</u> Slavonian grebe <i>Podiceps auritus</i> Pied Avocet <i>Recurvirostra avosetta</i> <u>Article 4.2</u> Regularly supports at least 20,000 overwintering waterfowl - Oystercatcher <i>Haematopus ostralegus</i> , grey plover <i>Pluvialis squatarola</i> , black-tailed godwit <i>Limosa limosa islandica</i> , dunlin <i>Calidris alpina</i> , dark-bellied brent goose <i>Branta bernicla bernicla</i> , wigeon <i>Anas Penelope</i> . Ringed plover <i>Charadrius hiaticula</i> and greenshank, <i>Tringa nebularia</i>	Direct loss	Direct loss of SPA habitat.	Red	Relevant Site Improvement Plan refs: <ul style="list-style-type: none"> Action 1 A-D: Review and management planning of recreational use and disturbance Other relevant information: Footprint suggests a 400m avoidance zone for this site to avoid urban impacts, especially cats. This is not included in current Local Plans. High tide roosts – map taken from previous Footprint work. SB has pulled together more info on high tide roosts which needs adding to the GIS layer. <u>HRA to check with Steering Group.</u> Need to have confidence that there is a comprehensive map of high tide roost locations. Recreational impacts – see discussion for Dawlish Warren above. Further discussion needed with EA, NE and SWW <u>as early as possible when options are discussed.</u> Poole Harbour SPD provides a useful reference for a strategic approach to dealing with nitrogen:	Potentially complex set of impacts stemming from urban and recreational disturbance, effects on water quality and loss of supporting habitat: <ul style="list-style-type: none"> Avoid – any development locations coming within 400m of SPA boundary. Follow – the revised mitigation strategy if development allocations are proposed within 10km of SPA, assume a recreational impact, which will need to be assessed and mitigated for. Avoid – high tide roost locations (to be mapped and buffer to be agreed). Discuss – approach to be taken re WWTW point source pollution – EA, NE, SWW. <u>HRA to obtain confirmation from EA regarding whether water quality is an issue and consider whether bird</u>
		Fragmentation/ Isolation	Possibility of fragmentation from associated non-SPA habitats (eg tidal rivers and grazing marsh upstream from SPA, grazing marsh west of Exminster Marshes)	Amber		
		Loss of supporting habitat	Loss of functionally linked waterbird roosting and foraging sites outside SPA boundary	Amber		
		Recreation impacts	Recreational disturbance to wintering waterfowl. 10km risk zone as per revised mitigation guidance	Amber		
		Air Quality	No			
		Water Quality	Impacts from elevated nutrient levels due to point source waste water treatment discharges (especially Countess Weir) and from pollution of surface water discharges from developments.	Yellow		
		Water Availability	Changes to incoming water flows from development surface water if unattenuated – may be especially relevant at Exminster Marshes. Development specific checks required.	Yellow		
		General urban effects	From development within 400m of roosts (unless a robust barrier between development and the site	Red		

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		Impact pathway	Relevance to site	Mitigation potential		
			can be demonstrated). Could include light pollution.		http://www.poole.gov.uk/planning-and-buildings/planning/planning-policy/spds/nitrogen-reduction-in-poole-harbour/	<u>mortality due to increased traffic may be a concern.</u>

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Site details	Features for which site is designated	Analysis of potential impact pathways			Relevant references and data sources	Recommended approach to addressing impacts
		Impact pathway	Relevance to site	Mitigation potential		
EXMOOR & QUANTOCK OAK WOODS SAC SS894440 Nearest part of SAC is c.3km from GESP area boundary	<u>Annex I Habitats</u> Old sessile oak <i>Quercus petraea</i> woods with <i>Ilex</i> and <i>Blechnum</i> in the British Isles Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (<i>Alno-Padion</i> , <i>Alnion incanae</i> , <i>Salicion albae</i>)	<i>Direct loss</i>	Direct loss of SAC habitat ruled out due to distance		Relevant Site Improvement Plan refs: <ul style="list-style-type: none"> Action 4A: "Further investigate potential atmospheric nitrogen impacts on the site, based on the application of guidance from Chief Scientist's Group Nitrogen Task and Finish Group" (means not yet determined) Other relevant information: Likely to be able to screen out all impacts at site selection stage. Air quality to be assessed at site allocation stage by mapping roads within 200m of all SACs.	Issues are all likely to be very localised. Can be screened out unless in close proximity. <ul style="list-style-type: none"> Flag – any localised risks to bat roost locations. Flag – any localised impacts on water quality. Flag - any potential air quality impacts if allocations likely to lead to increased traffic within 200m. HRA may need to look at multiple small contributions (In light of Wealden decision)
		<i>Fragmentation/ Isolation</i>	Fragmentation ruled out due to distance			
		<i>Loss of supporting habitat</i>	Effects on SAC bat populations due to impacts on habitat outside SAC boundary	Amber		
		<i>Recreation impacts</i>	Vandalism to bat roosts	Yellow		
	<u>Annex II Species</u> Barbastelle <i>Barbastella barbastellus</i> Bechstein`s bat <i>Myotis bechsteinii</i> Otter <i>Lutra lutra</i>	<i>Air Quality</i>	Impacts on habitats from nitrous oxide emissions from traffic	Yellow?		
		<i>Water Quality</i>	Water quality impacts on otter in rivers which link to SAC	Yellow		
		<i>Water Availability</i>	No			
		<i>General urbanisation effects</i>	Possibly some localised risks to bat habitat outside SAC			

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Site details	Features for which site is designated	Analysis of potential impact pathways			Relevant references and data sources	Recommended approach to addressing impacts
		Impact pathway	Relevance to site	Mitigation potential		
EXMOOR HEATHS SAC SS864419 Nearest part of SAC is c.1.5km north of GESP boundary	<u>Annex I Habitats</u> Northern Atlantic wet heaths with Erica tetralix European dry heaths Vegetated sea cliffs of the Atlantic and Baltic coasts *Blanket bogs Alkaline fens Old sessile oak woods with Ilex and Blechnum in the British Isles <u>Annex II Species</u> -	<i>Direct loss</i>	Direct loss of SAC habitat ruled out due to distance		HRA to confirm that NE are happy to screen this site out due to distances.	Issues are all likely to be very localised. Can be screened out unless traffic increases in close proximity. <ul style="list-style-type: none"> Flag - any potential air quality impacts if allocations likely to lead to increased traffic within 200m. HRA may need to look at multiple small contributions (In light of Wealden decision). Discuss - need to evaluate recreational impacts in conjunction with LPA's HRA work.
		<i>Fragmentation/ Isolation</i>	Development that severs or sterilises part of the SAC			
		<i>Loss of supporting habitat</i>	Development that severs or sterilises supporting habitat			
		<i>Recreation impacts</i>	Some potential for habitat deterioration from recreation	Amber		
		<i>Air Quality</i>	Impacts on habitats and lichen from nitrous oxide emissions from traffic	Yellow?		
		<i>Water Quality</i>	Water quality impacts on migratory salmon and otter in rivers which link to SAC	Yellow?		
		<i>Water Availability</i>	Water availability impacts on migratory salmon and otter in rivers which link to SAC	Yellow?		
		<i>General urbanisation effects</i>	No, due to distance			

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Site details	Features for which site is designated	Analysis of potential impact pathways			Relevant references and data sources	Recommended approach to addressing impacts
		Impact pathway	Relevance to site	Mitigation potential		
LYME BAY & TORBAY SCI SY31583 Reefs offshore from Lyme Bay and the coastline + subtidal areas between Mackerel Cove and Dartmouth	<u>Annex 1 Habitats</u> Reefs Submerged or partially submerged sea caves	<i>Direct loss</i>	No, but potential for local plan level concerns		<u>Relevant Site Improvement Plan refs:</u> <ul style="list-style-type: none"> Action 3A mentions desire to support local partners in continuing to work with recreational interests to manage impacts on sea caves. <u>Other relevant information:</u> Further discussion needed with EA, NE and SWW regarding water quality at site allocation stage	Potential impacts re disturbance to sea caves and water quality are localised, but need further discussion: <ul style="list-style-type: none"> Discuss - impacts on sea caves should be addressed through dialogue with stakeholders and associated management planning efforts. Discuss - approach to be taken re water quality – EA, NE, SWW
		<i>Fragmentation/ Isolation</i>	No, but potential for local plan level concerns			
		<i>Loss of supporting habitat</i>	No, but potential for local plan level concerns			
		<i>Recreation impacts</i>	Potential for additional disturbance from recreational diving, water sports etc	Yellow		
		<i>Air Quality</i>	No			
		<i>Water Quality</i>	Water quality impacts on habitats	Yellow		
		<i>Water Availability</i>	No			
		<i>General urbanisation effects</i>	No			

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Site details	Features for which site is designated	Analysis of potential impact pathways			Relevant references and data sources	Recommended approach to addressing impacts
		Impact pathway	Relevance to site	Mitigation potential		
QUANTS SAC ST 186178 Blackdown Hills, 0.5km on Somerset side of county boundary	<u>Annex II Species</u> Marsh Fritillary butterfly <i>(Eurodryas aurinia)</i>	<i>Direct loss</i>	No, due to distance		Relevant Site Improvement Plan refs: <ul style="list-style-type: none"> Action 1B: Suitable Marsh Fritillary habitat within 10km of the site should be identified, managed and protected. Action 2A: "Further investigate potential atmospheric nitrogen impacts on the site, based on the application of guidance from Chief Scientist Group Nitrogen Task and Finish Group" (means not yet determined) Other relevant information: Potential and known marsh fritillary habitats have been mapped - see mapping notes below.	Impacts could occur on Marsh Fritillary supporting habitat (possibly minimal given isolated location of site, unless significant allocations in Hemyock area): <ul style="list-style-type: none"> Flag - development allocations affecting known/potential (mapped) Marsh Fritillary sites on supporting habitat outside SAC. Map needs to be checked if within 10km, especially within Blackdown Hills (ie Hemyock area).
		<i>Fragmentation/ Isolation</i>	Potential impacts on SAC marsh fritillary population from loss, fragmentation or isolation of habitat supporting or potentially supporting this species within 10km of the SAC	Amber		
		<i>Loss of supporting habitat</i>	Potential impacts on corridors between these sites?	Yellow?		
		<i>Recreation impacts</i>	No			
		<i>Air Quality</i>	Potential impacts due to nitrous oxide emissions from traffic - can be screened out due to the distance of the site from the GESP area			
		<i>Water Quality</i>	No			
		<i>Water Availability</i>	No			
		<i>General urbanisation effects</i>	No – too far from GESP area			

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Site details	Features for which site is designated	Analysis of potential impact pathways			Relevant references and data sources	Recommended approach to addressing impacts
		Impact pathway	Relevance to site	Mitigation potential		
RIVER AXE SAC SY267961 North of Whitford, near Axminster, East Devon	<u>Annex I Habitats</u> Water courses of plain to montane levels with the <i>Ranunculon fluitantis</i> and <i>Callitricho-Batrachion</i> vegetation	<i>Direct loss</i>	Direct loss of SAC habitat	Red	<u>Relevant Site Improvement Plan refs:</u> • Elevated P levels, suspended solids and siltation all identified as issues in the Plan (Action 1A etc), and also in Diffuse Water Management Plan for the Axe. <u>Other relevant information:</u> Run-off from damaged roads a potential problem. Point source impacts to be assessed in combination with diffuse pollution issues (refer to - Axe Nutrient Management Plan, Diffuse Water Management Plan, SIP and Catchment Abstraction Management Strategy).	Indirect impacts could result if development caused additional point source discharges and urban drainage run-off into tributary streams: • Flag –development options leading to additional point source discharges need further consideration. • Flag – any options/roads in close proximity that may lead to run-off to streams and main river. • Discuss – EA, NE and SWW need to agree approach re water quality. • Flag – Development options leading to more traffic within 200m need further consideration.
		<i>Fragmentation/ Isolation</i>	No			
		<i>Loss of supporting habitat</i>	No			
		<i>Recreation impacts</i>	No			
	<i>Air Quality</i>	Impacts on habitats from nitrous oxide emissions from traffic – potential impact unknown	Yellow			
	<i>Water Quality</i>	Water quality impacts on habitats and water availability – elevated P, suspended solids and silt all an issue	Yellow			
	<i>Water Availability</i>	No				
<u>Annex II Species</u> Sea lamprey <i>Petromyzon marinus</i> Brook lamprey <i>Lampetra planeri</i> Bullhead <i>Cottus gobio</i>	<i>General urbanisation effects</i>	Invasive species would be a localised issue				

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Site details	Features for which site is designated	Analysis of potential impact pathways			Relevant references and data sources	Recommended approach to addressing impacts
		Impact pathway	Relevance to site	Mitigation potential		
SIDMOUTH TO WEST BAY SAC SY326912 Adjacent to south west coast path, west of Lyme Regis	<u>Annex I Habitats</u> Vegetated sea cliffs of the Atlantic and Baltic coasts <i>Tilio-Acerion</i> forests of slopes, screes and ravines Annual vegetation of drift lines <u>Annex II Species</u> -	<i>Direct loss</i>	No		Relevant Site Improvement Plan refs: <ul style="list-style-type: none"> Action 4A: "Develop an improved evidence base by assessing the combined impact of existing small-scale developments (such as beach huts, chalets, caravan parks etc) to better understand the cumulative effect of such development on the interest features across local authority boundaries, and seek positive solutions." Action 6: actions relating to managing impact of vehicles Action 7: actions relating to minimising habitat fragmentation Action 8: measures around inappropriate coastal management Action 9A: "Further investigate potential atmospheric nitrogen impacts on the site, based on the application of guidance from Chief Scientist Group Nitrogen Task and Finish Group" (means not yet determined) 	Impacts could arise from additional localised recreational pressure and water pollution. Both need further consideration to determine approach: <ul style="list-style-type: none"> Discuss – approach to localised cumulative recreation impacts. Discuss - water quality impacts need further discussion.
		<i>Fragmentation/ Isolation</i>	No			
		<i>Loss of supporting habitat</i>	No			
		<i>Recreation impacts</i>	Additional recreational pressures from local foot traffic on coast path and beaches would be a localised issue			
		<i>Air Quality</i>	No			
		<i>Water Quality</i>	Water quality impacts on habitats	Yellow		
		<i>Water Availability</i>	No			
		<i>General urbanisation effects</i>	No			

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Site details	Features for which site is designated	Analysis of potential impact pathways			Relevant references and data sources	Recommended approach to addressing impacts
		Impact pathway	Relevance to site	Mitigation potential		
SOUTH DARTMOOR WOODS SAC SX710701 Southern part of National Park west of Newton Abbot	<u>Annex I Habitats</u> Old sessile oak woods with Ilex and Blechnum in the British Isles European dry heaths <u>Annex II Species</u> -	<i>Direct loss</i>	No		Relevant Site Improvement Plan refs: <ul style="list-style-type: none"> Action 1A: "Further investigate potential atmospheric nitrogen impacts on the site, based on the application of guidance from Chief Scientist Group Nitrogen Task and Finish Group" (means not yet determined) Other relevant information: Impacts of trampling on habitats was reviewed in the TDC HRA and it was suggested that impacts are localised due to levels of recreation and extensive areas of habitat. The HRA recommended monitoring (p.51 of HRA). <u>Dartmoor are producing their Local Plan – need to ensure that HRAs are consistent. Evidence available (by SWEEP team at Exeter University) - 'Population futures and Dartmoor National Park:</u>	Main impacts would arise from localised recreational disturbance from additional visitor traffic: <ul style="list-style-type: none"> Discuss approach to evaluating potential recreational impacts in conjunction with TDC and DNPA's HRA work. Flag - any potential air quality impacts if allocations likely to lead to increased traffic within 200m. HRA may need to look at multiple small contributions (In light of Wealden decision). <u>HRA to confirm that nitrous oxide emissions from traffic is an issue that can be screened out (check with NE).</u> <u>HRA to cross reference to Dartmoor NP plan and Recreation Futures work</u>
		<i>Fragmentation/ Isolation</i>	No			
		<i>Loss of supporting habitat</i>	No			
		<i>Recreation impacts</i>	Recreational disturbance from increased visitor pressure (trampling, litter, fire, nutrient enrichment)	Yellow		
		<i>Air Quality</i>	Impact on habitats from nitrous oxide emissions from traffic and other sources– potential impacts unknown. Lichen death and enrichment of low nutrient habitat	Yellow?		
		<i>Water Quality</i>	No			
		<i>Water Availability</i>	No			
<i>General urbanisation effects</i>	No	Yellow				

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					Implications of development around the outskirts of Dartmoor for recreational use and management of access' (2018)	
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Site details	Features for which site is designated	Analysis of potential impact pathways			Relevant references and data sources	Recommended approach to addressing impacts
		Impact pathway	Relevance to site	Mitigation potential		
SOUTH HAMS SAC SX 942565	Annex I Habitats European dry heaths Semi-natural dry grasslands and scrubland faces: on calcareous substrates (<i>Festuco-Brometalia</i>) Vegetated sea cliffs of the Atlantic and Baltic coasts Caves not open to the public	<i>Direct loss</i>	Direct loss of SAC habitat	Red	Relevant Site Improvement Plan refs: <ul style="list-style-type: none"> Action 5A: Identify where public recreation may be causing disturbance, and develop a plan of mitigation (Devon CC, targeted for 2016) Action 7A: Investigate the effects of erosion and eutrophication by walkers and dogs on the calcareous grasslands of Berry Head (outside GESP area, but highlights the erosion concern at the site). Action 9A: "Further investigate potential atmospheric nitrogen impacts on the site, based on the application of guidance from Chief Scientist 	Main issues are impacts on foraging and commuting habitat and immediate disturbance effects from development taking place close by: <ul style="list-style-type: none"> Avoid any development locations coming within 400m of SAC boundary. Avoid – Mapped sustenance zone and the new Landscape Connectivity Zone unless risks can be ruled out. Follow – currently agreed strategic approach for this site (being reviewed and new GNB data added). Flag - potential for impacts within a 4km radius of SAC, and connections between 4km zones: review once sustenance zones agreed. Discuss – TDC have been considering producing guidance/policy re Turbines/PV and biodiversity, including mapping of sensitive zones.
		<i>Fragmentation/ Isolation</i>	Development could interrupt bat routes to other parts of SAC, supporting roosts and to foraging areas	Amber		
		<i>Loss of supporting habitat</i>	Effects on bat SAC population due to impacts on functionally linked habitat outside SAC boundary. Impacts within the 4km sustenance zone buffer and interfering with commuting between sustenance zones/SAC roosts	Amber		
		<i>Recreation impacts</i>	Recreational disturbance to bat roosts from	Yellow		

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<p>*Tilio-Acerion forests of slopes, screes and ravines <u>Annex II Species</u> Greater horseshoe bat <i>Rhinolophus ferrumequinum</i></p>		climbing etc needs to be resolved locally		<p>Group Nitrogen Task and Finish Group" (means not yet determined)</p> <p>Other relevant information: Approach based on the 'South Hams SAC Greater Horseshoe Bat Consultation Zone Planning Guidance published by Natural England (2010). This anticipated to be updated imminently with approval of a jointly prepared 'South Hams Special Area of Conservation Habitats Regulations Assessment Guidance' (2019) document.</p>	<p>TDC would be happy to do this in collaboration with other LAs.</p> <p><u>HRA to make links to South Hams SAC: Habitats Regulations Assessment Guidance and consider whether mortality due to increased traffic may be a concern.</u></p>
	<i>Air Quality</i>	Impacts on non-bat elements of SAC, e.g. rare lichens in cited woods at Chudleigh			
	<i>Water Quality</i>	No			
	<i>Water Availability</i>	No			
	<i>General urbanisation effects</i>	<p>Impacts from cats from houses within 400m of the roosts; invasive species in cited non-bat habitats</p> <p>Light pollution on bat flyways, supporting roosts and foraging areas</p>	<p>Red</p> <p>Amber</p>		

3.3 Sites screened out as no likely significant effect by the County Ecologist (with advice from Natural England) are as follows in Table 4.

Table 4: Sites screened out as no likely significant effect

Site	Site information	Explanation
Bracket's Coppice SAC	<p><u>Annex I Habitats</u> <i>Molinia</i> meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinion caeruleae</i>)</p> <p><u>Annex II Species</u> Bechstein's bat (<i>Myotis bechsteinii</i>)</p>	This site can be screened out from impacts as the GESP area falls outside NE's Integrated Risk Zone for the site.
Hestercombe House SAC	<p><u>Annex I Habitats</u> -</p> <p><u>Annex II Species</u> Lesser horseshoe bat maternity roost <i>Rhinolophus hipposideros</i></p>	This site can be screened out from impacts due to the distance of the site and any associated habitat from the GESP area. Natural England has confirmed
Holme Moor & Clean Moor SAC	<p><u>Annex I Habitats</u> Calcareous fens with <i>Cladium mariscus</i> and species of the <i>Caricion davallianae</i> <i>Molinia</i> meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinion caeruleae</i>)</p>	Suggested that this site can be screened out from impacts due to the distance of the site, and any associated habitat, from the GESP area + as no rivers in the GESP area which feed into Holme Moor.
Somerset Levels and Moors SPA/ Ramsar	<p><u>Article 4.1</u> Wintering Bewick's Swan and Golden Plover</p> <p><u>Article 4.2</u> Wintering Shoveler, Teal, Wigeon + wetland assemblage of international importance.</p>	This site can be screened out from impacts due to the distance of the site and any associated habitat from the GESP area. Natural England has confirmed.
West Dorset Alderwoods SAC	<p><u>Annex I Habitats</u> Alluvial forest with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i>, <i>Molinia</i> meadows on calcareous, peaty or clay-silt-laden soils (<i>Molinion caeruleae</i>), old acidophilous oak woods with <i>Quercus robur</i> on sandy plains</p> <p><u>Annex II Species</u> Marsh fritillary butterfly (<i>Euphydryas aurinia</i>) and great crested newt (<i>Triturus cristatus</i>)</p>	<p>Potential impact on associated Marsh Fritillary habitat. However, there is no Marsh Fritillary habitat within 10km of the SAC and within the GESP area.</p> <p>Potential loss of species and associated impact on marsh fritillaries due to nitrous oxide emissions from traffic. This can be screened out due to the distance of the site from the GESP area.</p> <p>Impacts on great crested newts can be screened out due to the distance of the site from Devon.</p> <p>Site therefore screened out.</p>

4. Conclusions

- 4.1 This report provides the output of an initial review and revision of the European site sensitivity analysis table. This review of the European site sensitivity table included testing and discussions between the HRA steering group and Footprint Ecology to ensure that the table performs as required. The revisions made to date are prior to understanding the levels of growth for the GESP and the main locations for large scale allocations.
- 4.2 This report is the first part of the HRA work for the GESP. It will be used to inform potential site options. Key issues to be taken forward into HRA are highlighted and understood (with actions underlined within the table).
- 4.3 It is apparent that within the GESP area the Exe Estuary SPA/Ramsar site, Dawlish Warren SAC, East Devon Pebblebed Heaths SAC and East Devon Heaths SPA, and South Hams SAC sites are the current focus of strategic protection approaches within the currently adopted local plans, with the Exe Estuary, Dawlish Warren and the Pebblebed Heaths being covered by a multi-site mitigation strategy, and the South Hams SAC having a strategic approach to the bat sustenance zones and landscape connectivity zone outside the SAC boundary.
- 4.4 The initial review of information for the sensitivity analysis suggests that the other European sites have more individual screening approaches and avoidance/mitigation requirements. These initial conclusions will be taken forward within the HRA.