



SOLWAY COAST AREA OF OUTSTANDING NATURAL BEAUTY

Management Plan – HRA and SEA Reports
Habitats Regulations Assessment and
Strategic Environmental Assessment Reports

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**Solway Coast Area of Outstanding Natural Beauty
Management Plan**

Habitats Regulations Assessment

Screening Report: December 2019

1. Introduction

Under the provisions of the Countryside and Rights of Way Act (2000), the Solway Coast Area of Outstanding Beauty (AONB) Partnership is required to produce an AONB Management Plan in partnership with Cumbria County Council, Carlisle City Councils and Allerdale Borough Council.

A Strategic Environment Assessment (SEA) Screening Report is being undertaken in relation to the Management Plan which will determine whether this new Plan will need to be subject to a Strategic Environmental Assessment. There is also a requirement under European and UK legislation to undertake a Habitats Regulations Assessment on the Plan. The Habitats Regulations Assessment is a test of the effect of the plan on the integrity of European nature conservation sites (referred to from this point on as 'European sites')¹. In this sense the objectives of the Habitats Regulations Assessment process initiated by this report are simply to test whether the AONB Management Plan will have a significant effect on European Nature Conservation Sites and, if it does, if that effect can be reduced to levels that are below 'significant'.

This report sets out the methodology for undertaking the Habitats Regulations Assessment, and it also sets out to describe which European sites will be considered in this assessment and the ways in which they may be sensitive to changes in the environment. This report also establishes whether the AONB Management Plan is likely to have a significant effect on European sites and establishes whether it is possible to reduce impacts on those Sites to non-significant levels.

¹ In this report European Nature Conservation Sites, namely Special Protection Areas and Special Areas of Conservation are considered alongside international Ramsar Wetland Sites, consistent with UK Government Policy (see section 3).

2. Description of Solway Coast AONB Management Plan

The primary objective of designation of the AONB is to conserve and enhance the natural beauty of the area (including flora, fauna, geological and landscape features); in pursuing this aim, the Solway Coast Management Plan also states that account should be taken of the needs of agriculture, forestry, other rural industries and the economic and social needs of communities (with particular regard to sustainable development). Although recreation is not an objective of designation, the Management Plan also states that the demand for recreation should be met so far as this is consistent with the conservation of natural beauty and the needs of agriculture, forestry and other uses. Therefore, the Management Plan should take account of these features and the changing status of many of the issues currently facing the AONB.

The AONB Management Plan may have influence on the following development issues within the Plan area as key relevant authorities, including local authorities and National Park Authorities that may take planning decisions, have a duty, when exercising their functions, to have regard to AONB purposes²: planning control - including lessening the likelihood for intrusive development, control over domestic extensions, telecommunications, minerals exploitation and greater control over resale of council houses to help meet the needs of local residents; and action for conservation - including securing funding from Government for conservation and sustainable development principles, helping farmers, land managers and communities to make landscape and biodiversity improvements, and application of the Conditional Inheritance Tax exemption in areas of outstanding scenic value.

The Management Plan set out by the Solway Coast AONB Partnership contains a Vision, together with a set of Outcomes. It further identifies specific actions for the conservation and enhancement of some of the area's special qualities or in relation to matters such as education and responsible tourism. Taken together, the plan formulates the local authority policy for the AONB (allied to those in local planning documents) and defines key partners' functions in relation to the AONB. In the Solway Coast AONB, the constituent local authorities agreed that a sub-group of the Joint Advisory Committee should co-ordinate preparation of the Management Plan on behalf of the constituent local authorities. The Management Plan aims to provide a framework for partnership working with all stakeholders who have an interest or involvement in the AONB's management. The Plan specifically provides a focus for:

- Drawing together up-to-date information on the AONB.
- Considering conflicting pressures and issues.
- Establishing clear and practical outcomes and actions to guide integrated decision-making and progress on the ground.

² The Duty is set out under Section 85 of the Countryside and Rights of Way Act, 2000.

3. Habitats Regulations Assessment

The Habitats Directive and the Requirement to Undertake Appropriate Assessment

The United Kingdom and its Overseas Territory of Gibraltar are subject to Council Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Fauna and Flora, which is often referred to as the Habitats Directive. The principal aim of the Directive is to promote biodiversity *'by requiring Member States to take measures to maintain or restore natural habitats and wild species listed in the Annexes to the Directive at a favourable conservation status'* (JNCC, 2012a)³. Amongst the measures the Directive requires to achieve this is the creation of *'a coherent European ecological network of special areas of conservation'*. This network also includes Special Protection Areas (SPAs) for birds, designated under Directive 79/409/EEC ('The Birds Directive') and is termed the Natura 2000 Network.

Article 6(3) of the Directive puts in place requirements on certain plans and projects:

*"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"* (European Commission, 1992)⁴.

The Conservation of Habitats and Species Regulations, 2010 (as amended)

As is normal practice, the Habitats Directive was transposed into UK law in 1994 as the Conservation (Natural Habitats &c.) Regulations, 1994. These Regulations were amended and consolidated on a number of occasions in the years following 1994 (2010, 2012 and most recently in 2017). Paragraph 63 'the Conservation of Habitats and Species (Amendment) Regulations, sets out the requirements for the undertaking of appropriate assessment where a plan *'is likely to have a significant effect on a European Site or a European Offshore Marine Site (either alone or in combination with other plans or projects)'*.

The Regulations also provide clarity on what is meant by 'European Site' under Regulation 8. This includes both terrestrial and marine Special Protection Areas (SPAs), Special Areas of Conservation (SACs), Sites of Community Importance (SCIs)⁵ potential SACs (pSACs) and potential SPAs (pSPAs).

While this legislation makes significant changes to the implementation of the Birds Directive in the UK, including a requirement for competent authorities to avoid pollution or deterioration of bird habitat wherever it may occur, the protocols for undertaking Appropriate Assessment, at least in terms of the Solway Coast AONB Management Plan, remain the same.

³ <http://jncc.defra.gov.uk/page-1374>.

⁴ European Commission, 1992. Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora [<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:31992L0043:EN:HTML>].

⁵ SCIs are sites that have been adopted by the European Commission but are not yet formally designated by the government of the country within which the site is situated.

What is a 'European Site'?

According to the Joint Nature Conservation Committee, which is the public body that advises the UK Government on UK-wide and international nature conservation, European sites include:

Special Areas of Conservation - *'strictly protected sites designated under the EC Habitats Directive. Article 3 of the Habitats Directive requires the establishment of a European network of important high quality conservation sites that will make a significant contribution to conserving the 189 habitat types and 788 species identified in Annex 1 and II of the Directive (as amended).'*

Special Protection Areas - *'strictly protected sites classified in accordance with Article 4 of the EC Birds Directive, which came into force in April 1979. They are classified for rare and vulnerable birds (as listed on Annex I of the Directive), and for regularly occurring migratory species.'*

Although not designated under European legislation **Ramsar Sites** are also considered as European sites in this assessment. These are wetlands of international importance designated under the Ramsar Convention on Wetlands that was established in Iran in 1971.

Sources: JNCC, undated. Special Areas of Conservation [URL: jncc.defra.gov.uk/default.aspx?page=23]/JNCC, undated. Special Protection Areas [URL: jncc.defra.gov.uk/default.aspx?page=162], Wetlands International, undated. Ramsar Wetland Data Gateway [URL: sedac.ciesin.columbia.edu/ramsardg/]

Consideration of Ramsar Sites and Other Sites

Unlike European sites, Ramsar sites are sites of international, rather than just European, importance, designated for wetlands. In practice in the UK most Ramsar sites also receive protection as Special Protection Areas. However, paragraph 118 of the Government's National Planning Policy Framework gives Ramsar sites and proposed Ramsar sites the same protection as European sites. The NPPF also states that pSACs⁶, pSPAs⁷ and 'sites identified, or required' as *compensatory measures for adverse effects on European sites*' should be given the same protection as European sites. While the AONB Management Plan is not a planning document, and thus not regulated by the NPPF, the NPPF is taken as reflective of wider Government policy. To address this indication of policy all Ramsar sites, where they lie in the study area (see section 4), will be considered alongside European sites, terrestrial or marine, in this assessment.

At the time of writing there is one Ramsar site in the study area, and no pSACs or pSPAs, or candidate sites.

As previously mentioned, for reasons of brevity, when this report refers to European sites, Ramsar sites are included in that definition.

⁶ Possible SACs. Potential

⁷ SPAs.

A Staged Approach to Appropriate Assessment: Habitats Regulations Assessment

The Habitats Regulations refer to the undertaking of 'appropriate assessment' in relation to plans and projects. However, in practice many organisations have addressed the requirement to undertake appropriate assessment via a series of steps. For instance, it is necessary to first determine the extent to which plans require appropriate assessment before the assessment can practically proceed, and to do this it is necessary to assess whether significant effects on European sites are likely and to establish what the 'appropriate assessment' itself should focus on. Following this an appropriate assessment report may be drafted that considers the effects of the plan on the integrity of European sites. In some cases, where no alternative solutions can be found, it will be necessary to undertake further work to identify the extent to which a plan should proceed because of imperative reasons of overriding public interest.

Since the appropriate assessment proper is a discreet stage of a potentially multi-staged process, to avoid confusion the process as a whole is usually referred to as Habitats Regulations Assessment.

In this assessment we have divided the full Habitats Regulations Assessment process, including appropriate assessment, into 4 key stages, as illustrated by Table 1, below. This report documents the undertaking of Stages 1 and 2 of this Habitats Regulations Assessment process.

Table 1: Habitats Regulations Assessment: Key stages

Stage 1		Progress
Pre-screening	1) Establish the outline methodology for undertaking the Assessment. 2) Identify whether the plan is subject to Habitats Regulations Assessment.	Undertaken in this report.
Stage 2		
Scoping and initial screening for likely significant effects	1) Identify international sites in and around the plan area. 2) Identify the conservation objectives and threats to site integrity of European sites. 3) Identify potential effects on European sites and the possible ways in which this might affect conservation objectives. 4) Make a high level assessment of whether significant effects can be ruled out by alone. (<i>see note 1</i>) 5) Examine other plans and programmes that could contribute to 'in combination' effects, where an impact alone cannot be concluded.	Undertaken in this report.
	<i>If no effects are likely - report no significant effects and consult Natural England on the findings.</i> <i>If effects are judged likely or any uncertainty exists - the precautionary principle applies - proceed to Stage 3.</i>	

1 Stage 3		
<p>Assessment under Regulation 63 of the Habitat Regulations, 2017: Appropriate Assessment</p>	<p>Consider how the elements of the plan identified as potentially having likely significant effects 'in combination' with other plans and projects will cause direct and indirect effects on the integrity of European sites in light of their conservation objectives (the 'Appropriate Assessment').</p> <p>1) Consider how any effects on the integrity of a site could be avoided by changes to plan and the consideration of alternatives.</p> <p>2) Develop mitigation measures (including timescale and mechanisms).</p> <p>3) Report outcomes of Appropriate Assessment including mitigation measures, consult with Natural England, the Environment Agency and wider (public) stakeholders as necessary.</p> <p><i>If plan will not have an adverse effect on the integrity of European sites alone or in combination with other sites (the AEol decision⁸) proceed without further reference to Habitat Regulations.</i></p> <p><i>If effects or any uncertainty remains following the consideration of alternatives and development of mitigation measures proceed to Stage 4.</i></p>	<p>This will be undertaken prior to the finalisation of the Management Plan if, and where necessary, though it is anticipated that this will not be required for a plan of this nature</p>
Stage 4		
<p>Procedures where significant effect on integrity of international site remains (Derogations)⁹</p>	<p>If impacts remain, a plan or programme can only proceed provided a series of 'sequential tests' (Habitat Directive's article 6 (4) derogation requirements) are satisfied. These are:</p> <p>Test 1: There must be no feasible <u>alternative solutions</u> to the plan or project which are less damaging to European Sites;</p> <p>Test 2: There must be <u>'imperative reasons of overriding public interest'</u> (IROPI) for the plan or project to proceed;</p> <p>Test 3: All necessary <u>compensatory measures</u> must be secured to ensure that the overall coherence of the network of European Sites is protected.</p>	<p>This will be undertaken prior to adoption of the Management Plan if, and where necessary, though it is anticipated that this will not be required for a plan of this nature.</p>

Note 1

²Account should be taken of the 'People over Wind' EU Court ruling - measures built into a project or possible adjustments to mitigate for potential impacts on European sites (e.g. rescheduling programmed works to avoid sensitive times of year for breeding birds) cannot be taken into consideration at the Likely Significant Effect screening stage, and the project would have to be taken forward to the Appropriate Assessment stage.

⁸ 'The AEol decision' is used in Defra's guidance and refers to deciding whether or not the Plan will result in 'adverse effects on integrity'.

⁹ Derogation is a provision that often features in EU legislation that allows part or all of a legal measure to be applied differently or not at all. In the case of the habitats directive the satisfaction of the three tests (outlined in Table 1) enable plans or projects to be adopted in spite of a likely effect on the European Sites.

Source - Pathway - Receptor Approach

While Table 1 sets out the broad steps that will be undertaken in this assessment, an underlying principle of the assessment is that a '*source - pathway -receptor*' approach will be followed to establish whether significant effects will occur or are likely.

A 'source-pathway-receptor' approach is often used in environmental risk management. It is a way of developing a conceptual understanding of how environmental harm can occur.

It stands to reason that if environmental or any other form of hazard is to occur it must come from somewhere. For instance a water pollution incident wouldn't occur unless there is some source or causal agent for that pollution (e.g. agricultural run off or an industrial facility). This is the **source**.

Environmental hazards would not present any problems unless there were a **receptor**, or a place that would be vulnerable to damage, that would be damaged when exposed to whatever hazard originates from the source. So an already sterile water body would be unlikely to be significantly affected by a pollution incident, whereas a freshwater ecosystem that relies on high water quality may be significantly affected by water pollution. However, there may also be secondary environmental effects if the water body drains to a location which is sensitive to pollution. In this assessment receptors are the European sites themselves or features (such as species) that may be functionally linked with those sites.

If, however, a sump or interceptor collected the pollution before it entered the water body receptor then significant effects on any ecosystem would be unlikely to occur. This is because there is no **pathway** by which the hazard (in this case pollution) can reach the receptor (the freshwater ecosystem).

Where the European sites are considered vulnerable to certain impacts those impacts can only be considered possible where there is a source for that impact and a pathway to the receptor.

Stage 1: Task 2. Identification of whether the plan is subject to Habitats Regulations Assessment

The Habitats Regulations give information on the types of plans that should be subject to Appropriate Assessment by stating:

"A competent authority, before deciding to undertake, or give any consent, permission, or other authorisation for, a plan or project which:

- (a) Is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects), and;*
- (b) Is not directly connected with or necessary to the management of that site,*

must make an appropriate assessment of the implications for that site in view of that site's conservation objectives"¹⁰.

While the definition of what constitutes a plan is not made clear under the Habitats Directive or the Regulations, the term 'plan' is considered to have a 'broad meaning'¹¹ Here it is considered that, as the Solway Coast AONB Management Plan influences the strategic direction for future project work, including land management and the advocacy position taken on future development proposals (which could have an environmental effect) it meets the definition a plan consistent with the guidance.

A second consideration required by the regulations is whether or not the 'plan' is 'directly connected with or necessary to the management of [a European Site]'. As the Solway Coast AONB Management Plan is concerned with sustainable development within the AONB as a whole, rather than being necessary to the management nature conservation sites, it can be considered to be subject to the Regulations.

In addition, guidance¹² states that AONB Management Plans which may have significant effects on sites covered by the Habitats Regulations must be assessed for these effects. The decision as to whether the Plan should then be subject to Appropriate Assessment will depend on the identification of any significant effects throughout this screening process.

It is not possible to determine whether the Solway Coast AONB Management Plan is 'likely to have a significant effect on a European Site' without first examining both the objectives and actions of the Plan alongside the conservation objectives of European sites in the Plan area. This is the purpose of stage 2 of this Habitats Regulations Assessment methodology. So the conclusion of Stage 1, Task 2 - the identification of whether the plan is subject to Habitats

¹⁰ Legislation.gov.uk, 2017. The Conservation of Habitats and Species Regulations 2017 [URL: www.legislation.gov.uk/ukxi/2010/490/contents/made].

¹¹ See Levett - Therivel et al, 2006. Appropriate Assessment of Plans [URL: www.levett-therivel.co.uk/index_files/AA.pdf], also Department of the Environment (Northern Ireland), 2002. The Habitats Regulations: A guide for competent authorities [URL: www.doeni.gov.uk/niea/habitat_regs_guidance_notes.pdf].

¹² Natural England, Landscapes for Life, The National Association for Areas of Outstanding Natural Beauty and Defra, 2012. Advice Note to AONB Partnerships, the Conservation Boards and Relevant Authorities on Management Plan Reviews. [URL: [http://www.aonb.org.uk/wba/naaonb/naaonbpreview.nsf/bde8521bf448d64080256ceb004a1670/4be3084534ef806280257a1e004d6220/\\$FILE/MP%20advice%20June%201.pdf](http://www.aonb.org.uk/wba/naaonb/naaonbpreview.nsf/bde8521bf448d64080256ceb004a1670/4be3084534ef806280257a1e004d6220/$FILE/MP%20advice%20June%201.pdf)].

Regulations Assessment' - is that such assessment is necessary for the Solway Coast AONB Management Plan, and that the assessment methodology should proceed until it can demonstrate that no significant effects are likely to result from the Plan, either alone or in combination with other plans and projects.

5. Stage 2: Scoping and initial screening for likely significant effects

5.1 Stage 2, Task 1: Identification of international sites in and around the plan area

The Plan Area of the Solway Coast AONB is shown at Figure 1. This map also shows any European and Ramsar Sites¹³ in the area.

Figure 1: The area of coverage of the Solway Coast Area of Outstanding Natural Beauty Management Plan



As impacts from the Management Plan may occur beyond the administrative boundary of the AONB, provided there is a pathway between the source of impacts and a European/Ramsar Site, a 15km buffer has been applied to the outer boundary of the AONB area and the European/Ramsar Sites within that buffer are also considered. However, it should be noted that for certain impacts, longer range pathways may exist. These will be investigated on a case-by-case basis. The European Sites within the AONB and a 15km buffer zone are:

1. Bolton Fell Moss SAC
2. Clints Quarry SAC
3. Raeburn Flow SAC
4. River Derwent (and Bassenthwaite Lake) SAC
5. River Eden and Tributaries SAC
6. Solway Firth SAC
7. Solway Mosses North SAC
8. South Solway Mosses SAC
9. Upper Solway Flats and Marshes SPA and Ramsar site
10. Walton Moss SAC

Figure 2: General location of the European sites

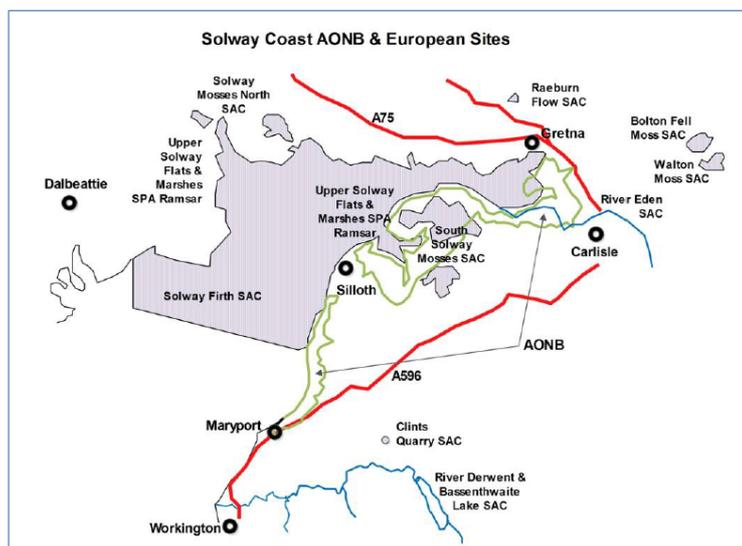


Figure 2 shows their locations

Sites which will not be considered further

The previous HRA report for the 2015-2020 AONB Management Plan identified a range of sites which could be removed from further consideration at this stage. There is no reason to believe that the situation in this regard has changed. These sites are:

Solway Mosses North and Raeburn Flow

In preparation for previous plan, "Scottish Natural Heritage (J Warren 21/01/14) confirmed that there is very unlikely to be interaction between the management of the AONB and the land-based Solway Mosses North and Raeburn Flow (both are SACs designated solely for bog habitat qualifying features)." These two sites, therefore, are not considered further.

Bolton Fell, Clints Quarry, the River Derwent / Bassenthwaite Lake, Walton Moss

In preparation for previous plan, "Natural England (B Donato 07/02/14) suggested that Bolton Fell (13 km from AONB boundary), Clints Quarry (8 km), the River Derwent (6 km) / Bassenthwaite Lake (14.5 km) and Walton Moss (14 km) are not likely to be affected by the management plan. As a precaution, these sites were the subject of a pre-screening exercise undertaken in 2014."

Bolton Fell is a commercial peat-extraction site. There are no interactions with the Solway Coast AONB and this site is not considered further.

Clints Quarry is an abandoned quarry. Its great crested newt population has developed since quarrying ceased in the 1980s. There are no interactions with the Solway Coast AONB and this site is not considered further.

The previous screening report concluded, "The River Derwent is to the south of the AONB but there may be connectivity through migratory fish (e.g. salmon). However, the River Eden receives the same species and it flows through a part of the AONB. Any mitigation found necessary for the River Eden will also protect the River Derwent. For this reason, the River Derwent SAC is not considered in the detailed screening." This was accepted in consideration of the last SEA and is considered to still be sound.

Walton Moss is a largely intact raised bog. There are no interactions with the Solway Coast AONB and this site is not considered further.

The remaining sites are all adjacent (or partly in) the AONB. Therefore, the AONB Management Plan may have the potential to affect four European sites. These are:

1. Solway Firth SAC;
2. South Solway Mosses SAC;
3. River Eden SAC;
4. Upper Solway Flats and Marshes SPA and Ramsar Site

The summary map in Figure 2 shows their general location.

¹³ See section 1.2.3 for a full list of designations considered in this assessment.

¹⁴ SAC, SPA and AONB boundary map layers are copyright Natural England 2013, issued under Open

Section 2 – The Four European sites in and around the Solway Coast AONB which are under assessment

SOLWAY FIRTH SAC

Designation:	Special Area of Conservation – (SAC)
SAC EU Code	UK0013025
Grid reference:	NY144648
Local Authority Areas	Cumbria County Council / Carlisle City Council/Allerdale Borough Council/Dumfries and Galloway
Area:	43636.72ha

The Solway is a large, complex estuary on the west coast of Britain. It is one of the least industrialised and most natural large estuaries in Europe. Tidal streams in the estuary are moderately strong and levels of wave energy can be high. There is considerable seasonal fluctuation in water temperature, owing to the shallow nature of the estuary. The Solway is an unusually dynamic estuarine system, with mobile channels and banks. The sediment habitats present are separated by six main river channels, which are continually changing their patterns of erosion and accretion. The Solway Firth has been little affected by enclosure, with the result that it demonstrates unusually large areas of upper marsh and transitions to freshwater grassland communities.

1. The characteristics of the European site:

General Site Character: Tidal rivers, Estuaries, Mud flats, Sand flats, Lagoons (including saltwork basins) (90%) Salt marshes, Salt pastures, Salt steppes (10%) Broad-leaved deciduous woodland (2.6%)

Vulnerability: This large site is subject to a number of activities. These include flood defence and coastal erosion work, fishing and shellfisheries (including a cockle fishery which is currently closed to allow stocks to recover), saltmarsh / merse grazing, oil and gas exploration (outwith the site), and industrial development. A management strategy to consider and co-ordinate these activities is being produced by the Solway Firth Partnership. This will set out the means by which it is proposed to secure the sustainable use of the estuary.

2. Conservation objectives: 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. Key Qualifying Features:

Primary habitat:

- Sandbanks which are slightly covered by sea water all the time
- Estuaries Mudflats and sandflats not covered by seawater at low tide
- Salicornia and other annuals colonizing mud and sand
- Atlantic salt meadows (*Glauco-Puccinellietalia maritimae*)

Qualifying Features

- Reefs
- Perennial vegetation of stony banks
- Fixed coastal dunes with herbaceous vegetation ('grey dunes')

Primary Species

- Sea lamprey *Petromyzon marinus*
- River lamprey *Lampetra fluviatilis*

Note: The Solway Firth provides migratory passage to and from spawning and nursery grounds in a number of rivers, including the Eden, which is designated as a SAC for the primary species

4. Relevant plans or projects:

PLANS:

- Plans within Carlisle City Council's Local Development Framework (LDF)
- Plans within Allerdale Borough Council's Local Development Framework (LDF)
- Cumbria Minerals and Waste Local Plan
- Cumbria Local Transport Plan
- Cumbria Rights of Way Improvement Plan

PROJECTS:

- Any major development identified in development plans (or elsewhere) with the potential to have a significant effect on Solway Firth SAC

Comment on plans or projects:

The attached spreadsheet addresses the likely significant effect of the management plan's suggested short-term outcomes and indicative actions.

SOUTH SOLWAY MOSSES SAC

Designation:	Special Area of Conservation – (SAC)
SAC EU Code	UK0030310
Grid reference:	NY203597
Local Authority Areas	Cumbria County Council / Carlisle City Council/Allerdale Borough Council/Dumfries and Galloway

Area: 1962.36ha

This is a complex of estuarine raised bogs to the south of the Solway, and is comprised of Wedholme Flow, Bowness Common, Drumburgh Moss and Glasson Moss. At 759 ha, Bowness Common is one of the largest Active raised bogs remaining in the UK. Although affected by past drainage and peat cutting, much of these sites support typical bog vegetation. Wedholme Flow contains the largest area of almost-intact active raised bog in England, but also some degraded raised bog in which peat cutting has recently ceased. The central part of Glasson Moss displays some of the most diverse raised bog vegetation in the UK today, with bog-moss species including abundant *Sphagnum pulchrum* as well as *S. fuscum*.

1. The characteristics of the European site:

General Site Character: Bogs, Marshes, Water fringed vegetation, Fens (100%)

Vulnerability: Past draining, peat extraction and agricultural reclamation has modified this site, along with fire damage. The implementation of a National Nature Reserve Management Plan in part of the area, including a major programme of installation of drains to raise water levels, is benefiting this site, and its condition is improving. Peat extraction has now ceased.

2. Conservation objectives: 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,
- The supporting processes on which qualifying natural habitats rely

3. Key Qualifying Features:

Primary habitat:

- Active raised bogs
- Degraded raised bogs still capable of natural regeneration

Qualifying Features n/a

Primary Species n/a

4. Relevant plans or projects:

PLANS:

- Plans within Carlisle City Council's Local Development Framework (LDF)
- Plans within Allerdale Borough Council's Local Development Framework (LDF)
- Cumbria Minerals and Waste Local Plan
- Cumbria Local Transport Plan
- Cumbria Rights of Way Improvement Plan

PROJECTS:

- Any major development identified in development plans (or elsewhere) with the potential to have a significant effect on Solway Firth SAC

Comment on plans or projects:

The attached spreadsheet addresses the likely significant effect of the management plan's suggested short-term outcomes and indicative actions.

Upper Solway Flats and Marshes SPA (and RAMSAR)

Designation:	Special Protection Area – (SPA)
SAC EU Code	UK0013025
Location:	54 54 20 N / 03 25 27 W
Local Authority Areas	Cumbria County Council / Carlisle City Council/Allerdale Borough Council/Dumfries and Galloway
Area:	43636.73ha

The Upper Solway Flats and Marshes SPA lies on the west coast on the border between England and Scotland. The flats and marshes of the Upper Solway form one of the largest continuous areas of intertidal habitat in Britain. The geomorphology and vegetation of the estuarine saltmarshes or merses are of international importance, with broad transitions to mature 'upper-marsh' being particularly well represented. The complete estuarine complex is of importance for wintering wildfowl (ducks, geese and swans) and waders, and is a vital link in a chain of west coast UK estuaries used by migrating waterbirds. The SPA supports virtually all of the Svalbard population of Barnacle Goose (*Branta leucopsis*) over the winter.

1. The characteristics of the European site:

General Site Character: Tidal rivers, Estuaries, Mud flats, Sand flats, Lagoons (including saltwork basins) (90%). Salt marshes, Salt pastures, Salt steppes (10%)

Vulnerability: The Solway Firth Partnership has been implementing a management strategy for the site. This addresses threats to the SPA interest and how the Firth can be used sustainably. The medium term impacts flood defence and coastal erosion works elsewhere within the site require monitoring. Shell fisheries are regulated by Government to ensure sustainability and reduce impact on birdlife. Roosts and feeding areas are vulnerable to disturbance.

2. Conservation objectives: Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;

- The extent and distribution of the habitats of the qualifying features
- The structure and function of the habitats of the qualifying features
- The supporting processes on which the habitats of the qualifying features rely
- The population of each of the qualifying features, and,
- The distribution of the qualifying features within the site.

3. Key Qualifying Features:

Primary habitat: n/a

Qualifying Features n/a

Primary Species

Cygnus cygnus; Whooper swan (Non-breeding)

Branta leucopsis; Barnacle goose (Non-breeding)

Pluvialis apricaria; European golden plover (Non-breeding)

Limosa lapponica; Bar-tailed godwit (Non-breeding)

Qualifying Species

Anas acuta: Pintail

Anas clypeata: Shoveler

Anas crecca: Teal

Anser brachyrhynchus; Pink-footed goose (Non-breeding)

Arenaria interpres; Ruddy turnstone (Non-breeding)

Aythya marila: Scaup

Bucephala clangula: Goldeneye

Calidris alba; Sanderling (Non-breeding)

Calidris alpina alpine: Dunlin

Calidris canutus; Red knot (Non-breeding)

Haematopus ostralegus; Eurasian oystercatcher (Non-breeding)

Numenius arquata; Eurasian curlew (Non-breeding)

Pluvialis squatarola: Grey Plover

Tadorna tadorna; Common shelduck (Non-breeding)

Tringa totanus; Common redshank (Non-breeding)

UPPER SOLWAY FLATS AND MARSHES RAMSAR

The flats and marshes of the Upper Solway Firth form one of the largest continuous areas of intertidal habitat in Britain. The complete estuarine complex is a site of national and international importance for wintering wildfowl and wading birds and is a vital link in a chain of west coast estuaries used by migrating birds. The site is also noted for its populations of breeding birds, natterjack toad *Bufo calamita* and invertebrates. The geomorphology and vegetation of the estuarine saltmarshes or meres is also of international importance with broad transitions to mature 'upper-marsh' being particularly well represented. A number of rare plant species and geological exposures also occur within the site.

Site Details

As SPA plus:

RAMSAR Code UK11079

Designated 1972

Ramsar criterion: 2 (Supports over 10% of the British population of natterjack toad *Bufo calamita*)

5 (International important assemblages of species – overwintering waterfowl)

Further species with important populations identified post-designation for possible inclusion under Criterion 6 - Lesser black-backed gull, *Larus fuscus graellsii*, Herring gull, *Larus argentatus argentatus*, Ringed plover, *Charadrius hiaticula*, Dunlin, *Calidris alpina alpina*

1. Characteristics of the Site

The most extensive areas of saltmarsh in the Solway are Rockcliffe and Burgh marshes towards the head of the estuary, the Caerlaverock and Kirkconnell Merse on the Scottish side and the marshes of Moricambe Bay in England. The saltmarsh vegetation reflects the age, substrate type and management of the marshes and shows a well-represented sequence of communities from the shore moving inland.

The seaward edge is usually typified by pioneer species, notably *Puccinellia maritima* and some *Salicornia europaea*. Other pioneering plants include *Glaux maritima*. Above this, there is a transition to a grassy saltmarsh dominated by *Festuca rubra*, *Armeria maritima* and *Juncus gerardii*. In places, *Agrostis stolonifera*, *Plantago maritima*, *Triglochin maritima*, *Oenanthe lachenalii* and various sedges are prominent in this central marsh zone. A number of other salt-tolerant plants such as *Glaux maritima* and *Limonium vulgare* are more local in their distribution. Towards the landward edge of the marshes, the proportion of halophytes gradually decreases leaving a sward dominated by *Agrostis* and *Festuca* grasses with species such as *Leontodon autumnalis*, *Juncus effusus*, *Holcus lanatus* and *Trifolium repens*. Brackish water areas to the inland edge of the marshes support some extensive stands of *Phragmites australis* or pools with aquatic plants such as *Catabrosa aquatica* and *Butomus umbellatus*.

In other areas, there are transitions to species-rich freshwater fen, in which *Filipendula ulmaria* and *Iris pseudacorus* are typical components, or to wind-pruned cliff-side oak woodland. In places there is development of scrub to the inland margins of the marshes; this mostly comprises of *Ulex europaeus*, often with *Ononis repens*, *O. spinosa* and *Rosa pimpinellifolia*.

The shingle and sand dune areas of Grune Point and Preston Merse support a typical range of plant species including *Eryngium maritimum*, *Geranium sanguineum* and *Coincya monensis* ssp. *Monensis*.

The intertidal muds and sands support large numbers of invertebrates, vitally important for the wading birds of the estuary. The main species present include *Hediste diversicolor*, *Arenicola marina*, various bivalves such as *Macoma balthica*, snails e.g. *Hydrobia ulvae*, and the amphipod *Corophium volutator*. There are mussel scars in places.

2. **Vulnerability:** As SPA

3. **Conservation measures**

Site/ Area of Special Scientific Interest designation and associated protection

National Nature Reserve designation and associated protection

Special Protection Area designation and associated protection

Land owned by a conservation NGO

Management agreement in place

Site management statement/plan implemented

Area of Outstanding National Beauty designation and associated protection

Special Area of Conservation designation and associated protection

4. **Relevant plans or projects:**

PLANS:

- Plans within Carlisle City Council's Local Development Framework (LDF)
- Plans within Allerdale Borough Council's Local Development Framework (LDF)
- Cumbria Minerals and Waste Local Plan
- Cumbria Local Transport Plan
- Cumbria Rights of Way Improvement Plan

PROJECTS:

- Any major development identified in development plans (or elsewhere) with the potential to have a significant effect on Solway Firth SAC

Comment on plans or projects:

The attached spreadsheet addresses the likely significant effect of the management plan's suggested short-term outcomes and indicative actions.

RIVER EDEN

Designation:	Special Area of Conservation – (SAC)
Grid reference:	NY462237 (centroid)
County:	Cumbria
Constituent SSSIs:	River Eden and Tributaries <i>Note: Only a small area of this SSSI lies within the Solway Coast AONB.</i>
Area:	2463.23 ha

1. The characteristics of the site:

General Site Character: Tidal rivers. Estuaries. Mud flats. Sand flats. Lagoons (including saltwork basins) (1%); Inland water bodies (standing water, running water) (93.4%); Bogs. Marshes. Water fringed vegetation. Fens (3%); Broad-leaved deciduous woodland (2.6%)

2. Vulnerability:

The maintenance of breeding and nursery areas for the species on this site depends on the habitat quality of streams and their margins. Many of the streams within the site suffer from overgrazing of riverbanks and nutrient run-off. This is being addressed by a number of measures, including a conservation strategy with actions to address river quality issues, and a partnership approach to funding habitat improvements. The water-crowfoot communities as well as the species are sensitive to water quality, particularly eutrophication. Again, actions have been identified for getting improvements in water quality and they will be carried forward in the periodic reviews of water company expenditure and reviews of consents under the Habitats Regulations.

Practices associated with sheep-dipping pose a potential threat at this site, and are currently under investigation. Much of the alluvial forest cover (not within the Solway Coast AONB) is fragmented and/or in poor condition. It is hoped to address this through management agreements or Woodland Grant Schemes with individual owners.

3. Conservation objectives:

Maintain* in favourable condition:

- floating formations of water crowfoot (*Ranunculus*) of plain and sub-mountainous rivers
- oligotrophic to mesotrophic standing waters with vegetation of the *Littorellerea uniflorae* and/or of the *Isoeto-Nanojuncetea*
- residual alluvial forests with *Alnion glutinoso-incanae*

Maintain* in favourable condition the habitats of:

- Atlantic salmon (*Salmo salar*)
- Bullhead (*Cottus gobio*)
- Brook lamprey (*Lampetra planeri*)
- River lamprey (*Lampetra fluviatilis*)
- Sea lamprey (*Petromyzon marinus*)
- White-clawed crayfish (*Austropotamobius pallipes*)
- Otter (*Lutra lutra*)

Annex I habitats that are a primary reason for selection of this site

- **Oligotrophic to mesotrophic standing waters with vegetation of the *Littorelletea uniflorae* and/or of the *Isoëto-Nanojuncetea***

Ullswater (not in the Solway Coast AONB), in the catchment of the River Eden, is the second-largest of the Cumbrian lakes. It is chosen as an example of a relatively deep lake with both oligotrophic and mesotrophic elements in its fauna and flora. The south-western part of the lake is surrounded by high fells of the Borrowdale Volcanics with enclosed farmland confined to the valley bottoms. The north-eastern arm is in gentler terrain with deeper soils and a greater extent of enclosed farmland. The lake flows into the River Eamont, one of the major tributaries of the River Eden. The lake has an extremely rich aquatic flora, including eight species of *Potamogeton*. These include various-leaved pondweed *P. gramineus*, red pondweed *P. alpinus* and long-stalked pondweed *P. praelongus*. The nationally scarce six-stamened waterwort *Elatine hexandra* is also found in some of the bays. Ullswater supports one of the few populations of powan *Coregonus lavaretus* in the UK. Arctic charr *Salvelinus alpinus* was formerly present but is believed to have become extinct in the 1940s, possibly because of mining pollution in spawning areas. *Note: No part of the River Eden catchment within the Solway Coast AONB drains into Ullswater.*

- **Water courses of plain to montane levels with the *Ranunculion fluitantis* and *Callitricho-Batrachion* vegetation**

The Eden is a north-western representative of sub-type 2. The river flows over both calcareous limestone and sandstone, giving a diversity of ecological conditions, ranging from oligotrophic to mesotrophic. This river has 184 recorded plant species, more than any other river in the UK. The *Ranunculus* species of the river system include stream water-crowfoot *Ranunculus penicillatus* ssp. *penicillatus* occurring here at the edge of its range, and others, such as *R. penicillatus* ssp. *pseudofluitans* and river water-crowfoot *R. fluitans*.

- **Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior* (*Alno-Padion*, *Alnion incanae*, *Salicion albae*)** - Priority feature

Throughout the length of the River Eden stands of alder *Alnus glutinosa* and willow *Salix* spp. occur associated with backwaters and seasonally-flooded channels. The least-disturbed stands are on the tributary River Irthing, where they occur on the shingle and gravels of actively-moving channels. The ground flora includes patches of common nettle *Urtica dioica*, butterbur *Petasites hybridus* and hogweed *Heracleum sphondylium* that grade into hollows with greater tussock-sedge *Carex paniculata*.

Annex II species that are a primary reason for selection of this site

- **White-clawed (or Atlantic Stream) crayfish *Austropotamobius pallipes***

The Eden is a river with high water quality that supports a large population of **white-clawed crayfish *Austropotamobius pallipes*** in the northern part of its range in England. The tributaries of the Eden, especially those flowing off limestone, are of particular importance.

- **Sea Lamprey *Petromyzon marinus***

The Eden represents a **sea lamprey *Petromyzon marinus*** population associated with an extensive river system on a varied and base-rich geology in northern England. The highly erodible nature of the rock results in extensive areas of gravel and finer silts being deposited throughout the system, providing conditions for spawning and nursery areas. A large and healthy population of sea lamprey is supported in the middle to lower regions of the river.

- **Brook lamprey *Lampetra planeri***

The Eden is an example of a **brook lamprey *Lampetra planeri*** population associated with an extensive river system on a varied and base-rich geology in northern England. The highly erodible nature of the rock results in extensive areas of gravel and finer silt being deposited

throughout the system, providing conditions for spawning and nursery areas. Brook lamprey is supported widely within the catchment.

- **River lamprey *Lampetra fluviatilis***

The Eden is an example of a **river lamprey *Lampetra fluviatilis*** population associated with an extensive river system on a very varied and base-rich geology in northern England. The highly erodible nature of the rock results in extensive areas of gravel and finer silt being deposited throughout the system, providing conditions for spawning and nursery areas. The high quality of these habitats and their accessibility, even in the upper reaches, means that a large, healthy population of river lampreys occurs widely within the catchment.

- **Atlantic salmon *Salmo salar***

The Eden represents one of the largest populations of **Atlantic salmon *Salmo salar*** in northern England. It is an excellent example of a large river system that flows over varied, base-rich geology. This coupled with its large range in altitude, results in the development of distinct habitat types, supporting diverse plant and invertebrate communities. The high ecological value of the river system and the fact that the salmon are able to use most of the catchment mean that the Eden is able to maintain a large population of salmon.

- **Bullhead *Cottus gobio***

The Eden represents **bullhead *Cottus gobio*** in a high-quality, relatively unmodified river in the northern part of its range in England. The presence of extensive areas of gravel and generally good quality water provides good habitat for bullheads, which are widely distributed throughout the system. The tributaries, in particular those flowing over limestone, hold abundant numbers of bullhead.

- **Otter *Lutra lutra***

The River Eden provides an example of lowland **otter *Lutra lutra*** habitats in north-west England and complements the selection of the River Derwent and Bassenthwaite Lake.

4. Relevant plans or projects:

PLANS:

- Plans within Allerdale Borough Council's Local Development Framework (LDF)
- Plans within Carlisle City Council's Local Development Framework (LDF)
- Cumbria Minerals and Waste Local Plan
- Cumbria Local Transport Plan
- Cumbria Rights of Way Improvement Plan

PROJECTS: Any major development identified in development plans (or elsewhere) with the potential to have a significant effect on the River Eden SAC

Comment on plans or projects: *The attached spreadsheet addresses the likely significant effect of the management plan's suggested short-term outcomes and actions..*

6. Stage 2: Task 2: Identifying the Conservation Objectives and Threats to the Integrity of European/Ramsar Sites

Section 5 of this report lists the European/Ramsar Sites contained within the area of study, and their conservation objectives, along with threats to site integrity.

Conservation objectives are broad objectives that define the key aims of the designated status (SPA/SAC/Ramsar) of a Site. While additional conservation objectives may exist to support other designations at the site, the Habitats Regulations Assessment is concerned with implications on the European/Ramsar status of the site and whether the features of interest that contribute to that status are likely to be maintained in favourable condition. Therefore, conservation objectives are listed as those pertaining to sites' European/international status¹⁵. It may, however, be necessary to gather additional information from SSSI conservation objectives, for example, where they contribute to the achievement of the broad SAC/SPA/Ramsar conservation objectives.

This report lists the European and Ramsar Sites identified as being within the Solway Coast AONB and the 15 km buffer around it. While many threats to site integrity are linked to a likely category of source of impacts - for instance inappropriate grazing or housing development - it is important for this assessment to consider that threats to integrity may also result from other operations that may not be listed. For instance, if inappropriate grazing levels may lead to colonisation of a grassland by scrub, causing loss of habitat, other unforeseen operations could cause a similar effect (for example deliberate planting of trees). It is possible to begin to identify the sorts of impacts for which each individual site could be a potential receptor. So if a site is vulnerable to hydrological change, for example, it could be inferred that flood management processes that have the potential to affect hydrology could be a potential source for an impact to occur. However, whether or not that impact can occur will depend on whether a pathway exists over which the source of hydrological change can project significant impacts to a European Site vulnerable to hydrological change (the receptor) (see Section 1 part 4 for a description of the 'source -pathway- receptor approach used in this assessment).

¹⁵ Conservation objectives in this Habitats Regulations Assessment report have been mainly drawn from those produced as a result of Defra's Report of the Habitats and Wild Birds Directive Implementation Review, as published on Natural England's website (See Natural England, undated. Conservation Objectives [URL: <http://www.naturalengland.org.uk/ourwork/conservation/designations/sac/conservationobjectives.aspx>].

7. Stage 2: Tasks 3-5. Screening for Likely Significant Effects in Combination with other Plans and Programmes

Potential Sources of Impacts from the Solway Coast AONB Management Plan

The Solway Coast AONB Management Plan sets the strategic framework across the AONB through the setting of Objectives and Actions for the future land and development management. The Management Plan, including the Outcomes and Actions, will be screened for likely significant impacts on European sites in this Habitats Regulations Assessment.

Because the Solway Coast AONB Management Plan is a strategic document in many cases it will not exhibit specific direct impacts on individual European and Ramsar Sites as it will not show the specific type of intervention that would, or would not occur at a specific location. However, there still exists the potential for these more strategic AONB Management Plan actions to steer local interventions in a direction that may result in the conservation objectives of European/Ramsar sites being compromised. Tyldesley, 2009¹⁷ describes some of the ways in which impacts on European sites may arise at the strategic plan making stage. Table 2, below summarises the observations made by Tyldesley and makes observations of potential relevance to an AONB Management Plan.

Table 2: Strategic-level impacts on European Sites (categories of impact and some source material for the mechanisms by which effects may occur are adapted from text in Tyldesley, D. 2009¹⁸)

Category of impact that could arise from a Strategic change	How such impacts might occur
Type of change	Theoretically a specific type of change might be proposed in an AONB management plan that may have a significant effect on one or more European sites regardless of the quantum of change or the location of that change. For instance, an objective that proposes that tourism should be focussed towards European sites rather than the AONB as a whole may have implications for European sites if they are sensitive to recreational pressure.
Quantity of change	In some cases a significant effect may occur as a result of the quantum of change that is likely to occur due to a specific objective. For instance, if a strategy would result in an increase in the quantity of farmers employing alternative management practices for farmland, designated habitats adjacent to farmland may be impacted by the change in management of large areas of land.

¹⁷ Tyldesley, D. 2009. The Habitats Regulations Assessment of Local Development Documents Revised Draft Guidance for Natural England. Natural England, Sheffield.

¹⁸ Tyldesley, D. 2009. The Habitats Regulations Assessment of Local Development Documents Revised Draft Guidance for Natural England. Natural England, Sheffield.

Location of change	There may be a strategic need to focus on, for example, traffic routing problems in a specific area. In such cases the necessary interventions may take place close to a European Site and exhibit direct effects, or may indirectly steer other forms of development to a location so that they exhibit an effect. In the outcomes of the Management Plan locations are not referred to; the strategic nature of the plan means that actions recommended are also not directly place-specific.
Blocking of other proposals or approaches	Future alternative approaches may be blocked by policies in a strategy. For instance a non-damaging policy approach may no longer be an option if the strategy commits an area to a specific approach that may in the longer term be damaging.
Justifying damaging development	Inclusion within a strategy may give justification to interventions that would have otherwise been considered on their merits alone. This may form part of a case to justify 'imperative reasons of overriding public interest' that would allow certain development or actions to go ahead under various regulatory controls, whereas were a project considered in its own right a different case may need to be made. It is therefore important to ensure that only interventions that are consistent with the Habitats Regulations' requirements are included in the Management Plan.
Combined/cumulative effects	Where on its own the Management Plan may not be likely to have significant effects, certain outcomes or actions may work in combination with other plans and projects in such a way that a significant effect may occur.

In Combination Impacts: Consideration of other Plans and Projects in this Assessment

The Habitats Directive requires that all significant effects of plans and projects, whether they be alone or in combination with other plans and projects, be assessed in view of European Sites' conservation objectives. This means that, even where an effect of the plan is deemed not to be significant on its own, it could be significant when added to the effects of one or more other plans and projects.

By the same token, it is important that in-combination assessment remains a manageable exercise. Therefore, the focus of in-combination assessment in this HRA will be on plans that direct future land management or development as these plans are considered to be the key sources of potential impacts.

It is recognised that the Solway Coast AONB Management Plan will be implemented in the context of changing spatial patterns and housing growth, as directed by other local spatial strategies, such as Local Plans. Many of the plans that will be reviewed during in combination assessment will have had Habitats Regulations Assessments carried out for them. These HRA documents will be useful in ascertaining the extent to which those plans are expected to impact on European sites.

Previous sections of the report show the plans that will be considered for in combination impact in this assessment. These plans will only be considered where relevant to the outcomes and actions being assessed. This list is not exhaustive as other plans not listed in the table may be seen to be relevant to individual elements of the AONB Management Plan. However, it gives an indicative illustration of the types of plans that are most likely to be considered.

Recording the Results of the Screening Assessment

All 9 short-term outcomes and the indicative actions have been screened for their likely impacts alone or in combination with European and Ramsar Sites. This is tabulated in the spreadsheet which forms **appendix 1**. Potential effects from all outcomes and actions will also be categorised as follows, following Tyldesley, 2009:

-No negative effect: these are element of the plan that would have no negative effect on any European Site;

-No significant negative effect: these are elements of the plan that could have an effect, but the likelihood is there would be no significant negative effect on a European Site either alone or in combination with other plans or projects. This category of effects includes trivial and '*de minimus*'¹⁹ impacts;

-Likely significant effect alone: these elements of the plan will require full appropriate assessment unless the plan can be modified in a way that reduces the effect to no significant negative effect or no negative effect;

-Likely to have a significant effect in combination: as with the above category, elements of the strategy categorised in this way will be subject to appropriate assessment unless the effect made by the strategy alone can be reduced to no significant negative effect or no negative effect.

Uncertain: this is where it is not possible to make a judgement on the likelihood of significant effects occurring. These impacts will require further investigation via an appropriate assessment.

Where actions promoted by the plan would themselves require an individual HRA were they to go ahead, this is clearly identified.

¹⁹ Insignificant, negligible or of minor importance.

See Appendix 1: Assessment of Likely Significant effects from the AONB Management Plan

In common with the approach taken in the SEA screening report, this assessment highlights the short-term outcomes and indicative actions in the plan and their likely impacts. *Where suggested actions, should they be brought forward, be then likely to require their own appropriate assessment before being carried out, this is highlighted.*

8. Conclusions

This assessment has concluded that there are no likely significant effects on Natura 2000 sites (SPAs and SACs) alone or in combination with other plans and projects.

However, the precautionary text "*individual proposals flowing from the management plan that may themselves be considered to be projects for the purposes of the Habitats Regulations will need to be permitted in accordance with those Regulations in order to be compliant with the Plan*", ***has been included in the finalised version of the AONB Management Plan as an extra measure in line with the 'Common Principles' section.***

9. Consultation

The statutory body for the purposes of HRA screening is Natural England. A Strategic Environmental Assessment (SEA) Screening Report has also been submitted to Natural England, Environment Agency and Historic England (statutory bodies for SEA) and the area's local authorities. In addition, this report will be placed on the AONB website.

An HRA screening statement will be published to show the conclusions of the screening exercise.

**Solway Coast Area of Outstanding Natural Beauty
Management Plan 2020-25**

Strategic Environmental Assessment

Screening Report: November 2019

Report by Solway Coast AONB Partnership

Solway Coast Area of Outstanding Natural Beauty Management Plan 2020-2025 Strategic Environmental Assessment - Screening Report October 2019

Introduction

1.1 This screening report has been produced to determine whether it is necessary to undertake a Strategic Environmental Assessment (SEA) of the Solway Coast Area of Outstanding Natural Beauty (AONB) Management Plan for 2020 to 2025. This is to ensure compliance with European Directive 2001/42/EC on ‘the assessment of the effects of certain plans and programmes on the environment’ (‘The SEA Directive’) and ‘The Environmental Assessment of Plans and Programmes Regulations, 2004 (Statutory Instrument 2004 No. 1633), which implements the Directive in England and for relevant non devolved plans and programmes in the UK as a whole.

2. AONB Management Plans and Guidance on SEA

2.1 Part IV, Section 89 of the Countryside and Rights of Way Act 2000 sets out the requirement for Conservation Boards or relevant Local Authorities to publish and review a management plan for their AONB that: *“formulates their policy for the management of the area of outstanding natural beauty and for the carrying out of their functions in relation to it”*. These management plans must be reviewed *‘at intervals of not more than 5 years’*.

2.2 In 2012, Natural England, the National Association for AONBs and the Department for Environment, Food and Rural Affairs (Defra) published an ‘Advice Note to AONB Partnerships, the Conservation Boards and Relevant Authorities on Management Plan Reviews’, which gave some early guidance on considering the need for SEA:

“The requirements of the SEA and Habitats Directives, and the need for compliance with them, apply to new management plans, and to revisions or re-issues of existing management plans.

AONBs and National Park Authorities (protected landscape managing bodies) should screen their revised or amended Management Plan to evaluate whether the individual or cumulative effect of the changes which they are proposing is likely to have a significant effect, as defined under the Strategic Environmental Assessment or Habitats Regulations. They may wish to seek informal guidance from Natural England (and Environment Agency, English Heritage for SEA) at this screening stage”.

That same guidance goes on to state that:

“Given that all the extant AONB Management Plans have been assessed under the regulations, the AONB Partnership / Conservation Board (protected landscape managing body) may decide that the proposed changes to the extant plan are not likely to have a significant effect, and may conclude that there is no requirement to carry out further assessment. The AONB

Partnership / Conservation Board should record the screening decision and supporting reasons for it”.

- 2.4 This Screening Report has been written to enable a judgement to be made on whether an SEA should be undertaken. In line with the ‘tripartite’ guidance outlined above, it discusses whether the Solway Coast AONB Management Plan 2020 to 2025 is likely to exhibit significant environmental effects, and documents supporting reasons for the report’s conclusions. A further screening report, to establish whether appropriate assessment under the Habitats Regulations is necessary, is also published alongside this report.

3. **The Solway Coast AONB Management Plan 2020 - 2025**

The draft Solway Coast AONB Management Plan sets out a vision for a living landscape as well as a series of nine desired short-term plus indicative actions that relate to topics of relevance to the AONB.

The previous plan presented a detailed set of objectives and actions across 17 pages. The new Management Plan removes this detailed action plan tables which were felt to be too prescriptive and narrow and less capable of responding to changing circumstances than might be appropriate. The new plan incorporates what is essentially an ‘outcomes framework’ or simple Theory of Change Model which identifies: a goal, 4 medium term outcomes, nine short term outcomes and a series of less prescriptive themed actions. This is seen as more logical way of brigading the necessary subject matter, with a strong focus on nature recovery.

There is an emphasis on:

- an ecosystems approach and support for bolstering our natural capital and the goods and services it helps to sustain
- nature recovery and conserving and enhancing landscape character
- encouraging responsible access to and enjoyment of natural beauty.

A new section of the plan identifies a series of ‘Common Principles’ which run through the document. These operating principles include the important reference to actions **not delivering one environmental benefit at the expense of another** (e.g. woodland planting on specie-rich grassland). This section of the plan, if fully adhered to, is felt to be an important safeguard against unintentionally damaging activity,

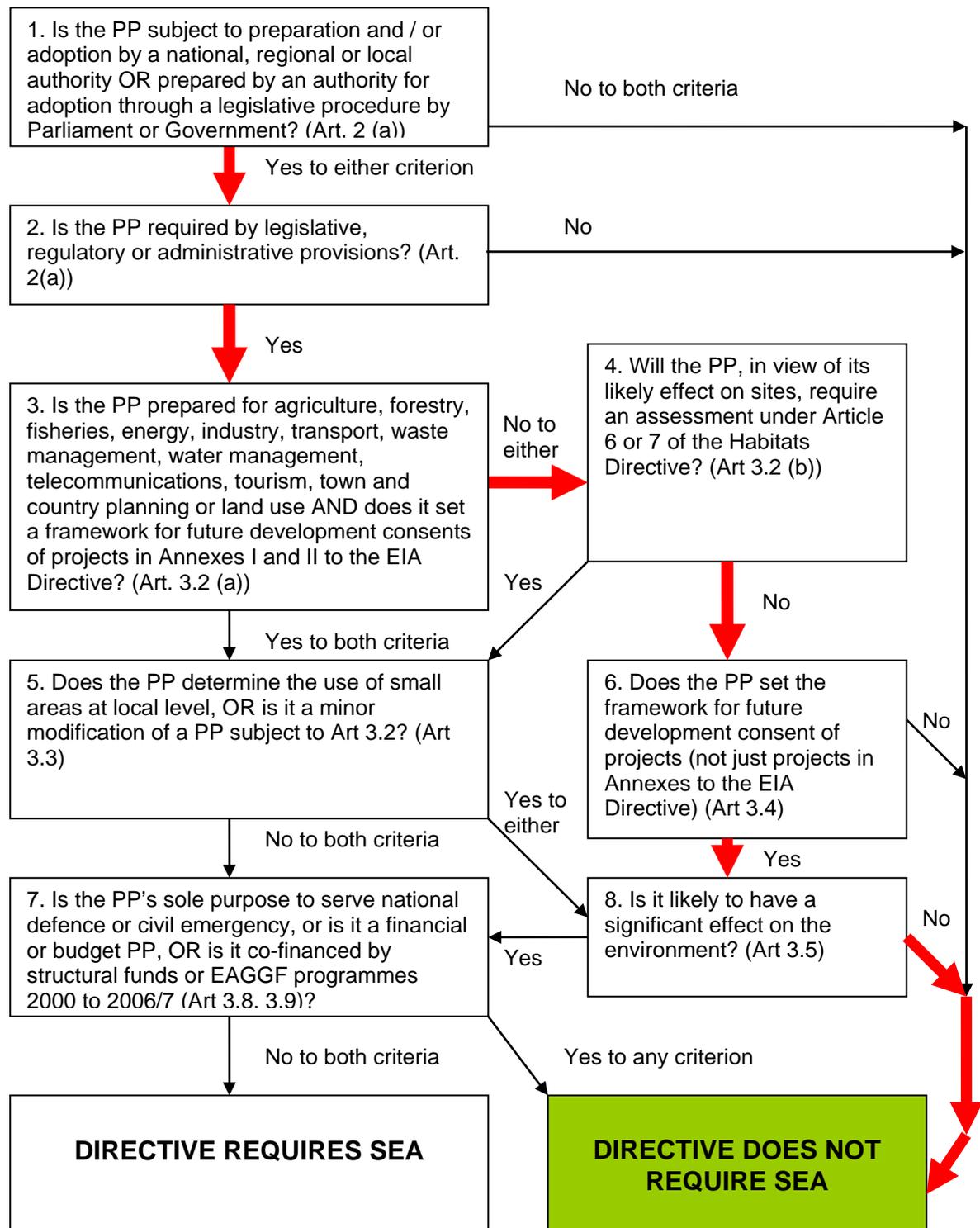
What is clear from this assessment is that plans/projects/initiatives arising from only a very small number of outcomes and indicative actions, depending on how they were realised, could conceivably have any negative effect on a European Site. *Even these would, in their development, be subject to individual SEA/HRA where required.*

4. **Screening**

- 4.1 The SEA Directive and accompanying national regulations describe the types of plans for which the undertaking of SEA is mandatory. There are also a number of other plans where a decision must be taken on whether SEA should be undertaken.
- 4.2 The Government has set out in a series of steps a means to determine which plans and programmes require SEA¹, as required by the SEA Directive. Figure 1 describes the steps that should be taken to determine the need for SEA. The path taken by the AONB Management Plan is indicated by a series of red arrows.

¹ ODPM, 2006. A Practical Guide to the Strategic Environmental Assessment Directive, ODPM, London

Figure 1: Deciding whether the SEA Directive is applicable to the AONB Management Plan



Anticipated status of the AONB Management Plan 2020 - 2025
(Adapted from ODPM, 2006)

4.3 Figure 1 shows a considered view of the status of the AONB Management Plan 2020 - 2025 in relation to the requirements of the SEA Directive. Further explanation of the reasons for selecting the Management Plan's pathway through the flow chart is shown in Table 1.

Table 1: Establishing the need for SEA

Stage	Answer	Reason
1. Is the PP subject to preparation and / or adoption by a national, regional or local authority OR prepared by an authority for adoption through a legislative procedure by Parliament or Government? (Art. 2 (a))	Yes	The AONB Management Plan will be prepared and adopted by Cumbria County Council, Carlisle City Council and Allerdale Borough Council
2. Is the PP required by legislative, regulatory or administrative provisions? (Art. 2(a))	Yes	The AONB Management Plan is being prepared under section 89 of the Countryside and Rights of Way Act, 2000
3. Is the PP prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use AND does it set a framework for future development consents of projects in Annexes I and II to the EIA Directive? (Art. 3.2 (a))	No	Although the AONB Management Plan covers several of these topics, it is unlikely that any work proposed, framed or required by the management plan would fall into Annexes I and II of the EIA Directive.
4. Will the PP, in view of its likely effect on sites, require an assessment under Article 6 or 7 of the Habitats Directive? (Art 3.2 (b))	No	A Habitats Regulations Assessment Screening Report has been completed. This report concluded that there are unlikely to be significant negative effects on the network of European Sites in and around the AONB. ²
5. Does the PP determine the use of small areas at local level, OR is it a minor modification of	Not applicable	This question need only be answered if questions 3 or 4 are answered in the affirmative.

² The Habitats Regulations Assessment Screening report is being consulted on in parallel with this SEA screening report. Should the consultation result in changes to the conclusions presented, this SEA screening report will be updated in line with those changes.

a PP subject to Art 3.2? (Art 3.3)		
6. Does the PP set the framework for future development consent of projects (not just projects in Annexes to the EIA Directive) (Art 3.4) ³	Yes	<p>A narrower interpretation of ‘framework for development consents’ would exclude the AONB Management Plan as it does not direct projects that would generally fall within the planning system.</p> <p>However, public bodies have a duty to consider the natural beauty of AONBs in their decisions, including in planning decisions⁴. Taking a broader interpretation of ‘framework’ (see footnote 3), the Management Plan may affect the outcome of future development consents, though only in as much as they affect the special qualities of the AONB.</p>
7. Is the PP’s sole purpose to serve national defence or civil emergency, or is it a financial or budget PP, OR is it co-financed by structural funds or EAGGF programmes 2000 to 2006/7 (Art 3.8, 3.9)?	Not applicable	This question need only be answered if the answer to question 6 is ‘no’. Or the answer to question 8 is ‘yes’.
8. Is it likely to have a significant effect on the environment? (Art 3.5) (See appendix for criteria and	No	The improvements to the AONB resulting from the strategic direction given by the AONB management plan are

³ The Directive is not clear on what constitutes a framework for development consents, but a broad interpretation has been taken in this assessment, informed partly by wider experience of SEA as described in the Resource Manual to Support Application of the UNECE Protocol on Strategic Environmental Assessment (United Nations draft document, 2006). This describes such frameworks as documents that place limits on types of activity from an area, contain conditions to be met by applicants if permission is to be granted, or that are designed to preserve certain characteristics of an area. (See: http://www.unece.org/fileadmin/DAM/env/eia/sea_manual/documents/SEA%20Manual%20-%20Chapter%20A3%20-%20slides.pdf)

⁴ Part IV, Section 85 (1) of the Countryside and Rights of Way Act 2000 establishes a general duty on public bodies: “In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty, a relevant authority shall have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty”. Public bodies are listed as relevant authorities.

<p>characteristics determining significance)</p>		<p>considered to be very unlikely to have significant negative effects on the environment. In addition, the outcomes and actions in general seek to conserve and enhance the special qualities of the AONB, mitigating the impact on development and reinforcing the character and quality of the landscape.</p> <p>Criteria for significance are presented in Annex II of the SEA Directive, in which a range of characteristics of plans are listed as influencing judgements on significance, as well as a range of characteristics of the area likely to be effected by the plan. Appendix 2 at the end of this report shows the SEA Directive's significance criteria alongside the likely effects of the plan.</p>
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5. Conclusion

- 5.1 The conclusion of this screening report is that a Strategic Environmental Assessment will not be required for the Solway Coast AONB Management Plan. This is because the plan is unlikely to display negative environmental effects.
- 5.2 Further work is been undertaken via a Habitats Regulations Assessment screening report to clarify whether the AONB Management Plan would require assessment under Article 6 or 7 of the Habitats Directive. This HRA Screening Report on the draft Management Plan has concluded that there will be no significant effects on European Sites and is subject to consultation⁵ with Natural England.

⁵ Section 61(3 and 4) of the Conservation of Habitats and Species Regulations, 2010 state that “(3) *The competent authority must for the purposes of the assessment consult the appropriate nature conservation body and have regard to any representations made by that body within such reasonable time as the authority specify*”, and “(4) *They must also, if they consider it appropriate, take the opinion of the general public, and if they do so, they must take such steps for that purpose as they consider appropriate*”

6. Consultation

- 6.1 The three statutory bodies for the purposes of SEA screening are Natural England, the Environment Agency and Historic England. These bodies will be consulted for their views on the conclusions of this screening assessment.
- 6.2 An SEA screening statement will be published to show the conclusions of the screening exercise.

Appendix 2: Judging Significance in Relation to the SEA Directive

Annex II of the SEA Directive lists criteria for determining the significance of environmental effects of a plan or programme. Taken together these criteria should inform judgements about whether environmental effects can be considered to be significant.

Table 2: Table showing criteria of significance listed in Annex II of the SEA Directive alongside an assessment of their applicability to the AONB Management Plan 2019 to 2024

Characteristic of significance	Is it significant?	Likely effect of plan
1. The characteristics of plans and programmes, having regard, in particular, to:		
The degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources	Yes	The AONB Management Plan will set a framework for a number of projects at a variety of scales.
The degree to which the plan or programme influences other plans and programmes including those in a hierarchy.	Yes	The AONB Management Plan does not influence a hierarchy of subsidiary plans, other than to promote conservation interests within the plans and policies of local authorities; actions include contributing to other plans and programmes of varying significance.
The relevance of the plan or programme for the integration of environmental considerations with a view to promoting sustainable development	Yes	The management plan sets sustainable development at the heart of its vision, and objectives and actions contribute to the maintenance of special qualities in the

		<p>AONB. This ensures that environmental considerations are fully integrated.</p> <p>The plan is considered highly beneficial to the achievement of sustainable development.</p>
Environmental problems relevant to the plan or programme	No	<p>The management plan is highly unlikely to cause negative environmental issues. There are no major shifts in emphasis from the previous 2015 to 2020 management plan, (beyond an explicit and wholly beneficial primary focus on nature recovery) which had been subject to SEA and shown not to exhibit significant negative environmental effects. Its implementation is highly likely to lessen problems such as atmospheric, soil and water pollution, loss of biodiversity, loss of landscape character, and deterioration of cultural heritage.</p>
The relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste-management or water protection).	No	<p>The management plan is carried out as a result of national legislation (the Countryside and Rights of Way Act) which is not transposed from higher Community legislation.</p>

2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:

<p>The probability, duration, frequency and reversibility of the effects,</p>	<p>No</p>	<p>The AONB Management Plan is unlikely to exhibit significant long term / frequent / irreversible effects as:</p> <ul style="list-style-type: none"> -Outcomes and actions generally link to and support national or local initiatives that are designed to enhance the quality of the rural environment; -Outcomes are linked to preserving special qualities so actions which are contrary to this are not promoted as part of the plan. -The condition of the AONB will be monitored as part of the management plan
<p>The cumulative nature of the effects</p>	<p>No</p>	<p>The generally positive environmental improvements are likely to negate / offset cumulative environmental effects arising from outside sources.</p>
<p>The transboundary nature of the effects</p>	<p>No</p>	<p>There is no likelihood of transboundary effects occurring.</p>
<p>The risks to human health or the environment (e.g. due to accidents),</p>	<p>No</p>	<p>Outcomes / actions which aim to promote physical and mental wellbeing would be of obvious benefit to human health</p>

<p>The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected),</p>	<p>No</p>	<p>The management plan applies to the entirety of the AONB over 115km² and a population of 13,000 Negative environmental effects are not likely to be felt.</p>
<p>The value and vulnerability of the area likely to be affected due to: special natural characteristics or cultural heritage</p>	<p>No</p>	<p>The AONB is a highly valued area that contains land of high biodiversity and cultural heritage value, making the area sensitive to environmental impacts. However, no such impacts are predicted and, due to the protections given to 'special qualities' emphasised in the management plan, would in any event be unlikely to be significant.</p>
<p>The value and vulnerability of the area likely to be affected due to exceeded environmental quality standards or limit values</p>	<p>No</p>	<p>The AONB management is highly unlikely to provoke the exceeding of any environmental thresholds and is likely to increase environmental capacity in many instances (e.g. by restoring biodiversity).</p>
<p>The value and vulnerability of the area likely to be affected due to intensive land-use</p>	<p>No</p>	<p>The AONB management plan is unlikely to promote intensive land use; rather it helps promotes less intensive farming.</p>
<p>The value and vulnerability of the area</p>	<p>No</p>	<p>The AONB is a highly valued nationally</p>

<p>likely to be affected due to the effects on areas or landscapes which have a recognised national, Community or international protection status</p>		<p>protected landscape designation. However, the management plan is integral to the maintenance of that status and aims to achieve this through positive interventions that are likely to enhance landscape value. Such interventions are shown to be similar in scope to those in the previous 2015 - 2020 management plan for which a previous SEA did not identify significant environmental effects.</p>
<p>Overall level of significance: Unlikely to exhibit negative effects on the environment.</p>		

SEA / HRA- Likely Impact and Mitigation - Solway Coast AONB Management Plan - Outcomes

This table a) identifies the 9 short-term outcomes in the AONB Management Plan b) cites the rationale behind them c) columns c-f considers the potential general impact on priority habitats and species across the AONB of delivering the outcomes identified in the draft management plan. Mitigation is considered where the impacts may be other than post Column F identifies the likely effects in the context of an HRA, after mitigation, the application of common principles in the plan and allowing for actions such as mosses restoration to require individual project by project assessments

Likely Impacts Key	
1	Wholly positive
2	Somewhat positive
3	Neutral
4	Somewhat negative
5	Wholly negative

HRA effect definitions

No negative effect: these are element of the plan that would have no negative effect on any European site

No significant negative effect: these are elements of the plan that could have an effect, but the likelihood is there would be no significant negative effect on a European Site either alone or in combination with other plans or projects. This category of effects includes trivial and de minimus impacts

Likely significant effect alone: these elements of the plan will require full appropriate assessment unless the plan can be modified in a way that reduces the effect to no significant negative effect or no effect

Likely to have a significant effect in combination: as with the above category, elements of the strategy categorised in this way will be subject to appropriate assessment unless the effect made by the strategy alone can be reduced to no significant negative effect or no negative effect.

Uncertain: this is where it is not possible to make a judgement on the likelihood of significant effects occurring. These impacts will require further investigation via an appropriate assessment.

Outcome	Rationale	Potential Impact 1-5 (see key)	Nature of mitigation	Impact after mitigation	Residual HRA Likely Significant Effects	Activity potentially requiring its own HRA on a European site
Outcome 1. The management of land and water increasingly promotes natural processes, increased connectivity and greater resilience to the challenges of climate change and other pressures	This focuses on working with nature rather than against it, increasing resilience to climate change, pests and diseases etc. being better connected across the whole landscape. It accords with the Lawton principles which are acknowledged to be beneficial for conservation	1	None - achieving this outcome would be wholly positive for conservation	1	No negative effect	Yes - Conservation proposals affecting a Natura 2000 site may require their own impact assessment
Outcome 2. Priority habitats and key species are better conserved and enhanced	The conservation and enhancement of species and habitats lies at the heart of nature recovery. It is part of the Lawton principles which are demonstrably beneficial for nature	1	None - achieving this outcome would be wholly positive for conservation	1	No negative effect	Yes - Conservation proposals affecting a Natura 2000 site may require their own impact assessment
Outcome 3. Landscape quality and character is more effectively conserved and enhanced	Change is inevitable and desirable and development must meet community need; it must also not detract from, and should ideally add value to, the purpose of designation	1	None - achieving this outcome would be wholly positive for landscape conservation and unlikely to have a negative impact on the features for which a Natura 2000 site was designated	1	No negative effect	Yes - Conservation proposals affecting a Natura 2000 site may require their own impact assessment
Outcome 4. Farmers deliver a wide range of public goods and are appropriately rewarded for doing so	Farming is the biggest landuse in the area and has the potential to do most good or harm. Farming delivering more for, and rewarding farmers properly, should lead to more biodiverse farmland more sustainable farming	1	None - achieving this outcome would be wholly positive for conservation, providing the public goods delivered on a Natura 2000 site are compatible with the conservation of features for which it was designated	1	No negative effect	Yes - Conservation proposals affecting a Natura 2000 site may require their own impact assessment
Outcome 5. Built heritage and cultural assets are better understood, conserved and managed	Built heritage is a key component of the wider definition of natural beauty	1	None	1	No negative effect	Yes. Where a built or other cultural heritage feature was on a Natura 2000 site any proposals would require their own impact assessment
Outcome 6. There are greater opportunities for people to increase their understanding of Solway's natural beauty	People will not care about and conserve things of which they are unaware and to which they are not exposed. The future of conservation lies with well-informed and motivated young people who are the next (and sometimes current) generation of environmental champions	1 to 3	The provision of this opportunity needs to be focused on those things which minimise waste, pollution and carbon emissions, avoid damage to landscape quality and wildlife, support the principles of sustainable building and employ good design. Should new infrastructure be required on, or in a location influencing, a Natura 2000 site and would need careful planning and delivery. In any development proposals the mitigation hierarchy would apply, with the option of refusal of anything requiring planning permission. Any proposals connected to this outcome which would have a physical impact on a Natura 2000 site would have their own impact assessment	1 to 3	No negative effect	Yes - proposals affecting a Natura 2000 site may require their own impact assessment
Outcome 7. More people, from a wider variety of backgrounds, can more easily and responsibly explore and enjoy the area.	The reference in the outcome to 'enjoying the area responsibly' should be noted. It is appropriate to diversify and democratize audiences for natural and cultural heritage, promote increased care for the environment and support the economy and to provide the information, interpretation and carefully planned, designed and sited infrastructure to enable this. An increase in sensitively delivered nature/culture-based 'things to see and do' increases understanding and enjoyment (and thereby hopefully, care and responsibility), whilst supporting the local economy through adding value to tourism and service businesses	1 to 3	The provision of this opportunity needs to be focused on those things which minimise waste, pollution and carbon emissions, avoid damage to landscape quality and wildlife, support the principles of sustainable building and employ good design. The potential impact of any significant increases in visitor numbers would have to be considered in any new proposal. New infrastructure has the potential to have a damaging impact if located on, or in a location influencing, a Natura 2000 site and would need careful planning and delivery.	1 to 3	No negative effect	Yes - Access and visitor infrastructure proposals affecting a Natura 2000 site may require their own impact assessment
Outcome 8. Skills and knowledge to conserve our natural beauty are increasing	Skills and knowledge are vital assets for the people who will be responsible for conserving and enhancing the area in the future	1 to 3	None	1 to 3	No negative effect	No - this relates to skills training and increasing knowledge
Outcome 9. People conserving and enjoying natural beauty has an increasingly positive impact on local services and the economy	An increase in sensitively delivered nature/culture-based 'things to see and do' increases understanding and enjoyment (and thereby hopefully, care and responsible behaviour), whilst supporting the local economy through adding value to tourism and service businesses	1 to 5	The provision of this opportunity needs to be focused on those things which minimise waste, pollution and carbon emissions, avoid damage to landscape quality and wildlife, support the principles of sustainable building and employ good design. New infrastructure has the potential to have a damaging impact if located on, or in a location influencing, a Natura 2000 site and would need careful planning and delivery. In any development proposals the mitigation hierarchy would apply, with the option of refusal of anything requiring planning permission. Any proposals connected to this outcome which would have a physical impact on a Natura 2000 site would have their own impact assessment	1 to 3	No negative effect	Yes, plans and projects would require their own individual assessments in order to proceed, should any be proposed affecting an N2K site, but in the main no.

ive or neutral



Date: 04 March 2020
Our ref: 310972
Your ref: Solway Coast AONB Management Plan SEA and HRA Screening



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BY EMAIL ONLY

Dear Naomi,

Thank you for your consultation on the above dated 21 February 2020 which was received by Natural England on 21 February 2020.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

This advice relates to the following documents:

- Solway Coast AONB Management Plan Habs Regs Screening Report (Final version received 03/03/2020)
- Solway Coast AONB Management Plan SEA and HRA Table (Final version received 03/03/2020)
- Solway Coast AONB Management Plan SEA Screening Report 2019

Habitat Regulations Assessment Screening

Having reviewed the above referenced documents, Natural England is satisfied the HRA Screening for the Solway Coast AONB Management Plan. We concur with the conclusions that there are no likely significant effects of Natura 2000 sites alone or combination with other plans and projects. We welcome the objective of the Management plan to conserve and enhancing natural beauty, and additional precautionary text to clarify certain proposals may require project level HRA as they come forward.

Strategic Environmental Assessment Screening

It is our advice, on the basis of the SEA Screening Report, that, in so far as our strategic environmental interests are concerned (including but not limited to statutory designated sites, landscapes and protected species, geology and soils), that there are unlikely to be significant environmental effects from the proposed plan.

For any queries relating to the specific advice in this letter only please contact John Dixon on john.dixon@naturalengland.org.uk. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely

John Dixon
Natural England