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Habitats Regulations Assessment of New Forest National Park Local Plan 2016-2036

Assessment of Regulation 19 Submission Draft

Prepared by LUC
January 2018

Project Title: HRA of New Forest National Park Local Plan 2016-2036

Client: New Forest National Park Authority

Version	Date	Version Details	Prepared by	Checked by	Approved by
1.0	14 November 2017	Draft for client review	Jonathan Pearson David Green	Jonathan Pearson Jeremy Owen	Jeremy Owen
2.0	17 November 2017	Draft for client review: Addition of Table A5.1 + changes to Chapter 5 re. offsite supporting habitat for Dartford warbler	Jonathan Pearson David Green	Jonathan Pearson Jeremy Owen	Jeremy Owen
3.0	27 November 2017	Revised draft, responding to client comments received 23/11/17	Jonathan Pearson David Green	Jonathan Pearson Jeremy Owen	Jeremy Owen
4.0	1 December 2017	Revised draft, reflecting changes made to Local Plan in response to recommendations of V3.0 HRA and revised approach to collision risk screening	Jonathan Pearson David Green	Jonathan Pearson Jeremy Owen	Jeremy Owen
5.0	5 December 2017	Revised draft, reflecting changes made to Local Plan in response to recommendations of V4.0 HRA in relation to Solent water quality	Jonathan Pearson David Green	Jonathan Pearson Jeremy Owen	Jeremy Owen
6.0	5 January 2018	Amended text to reference separate HRA of air pollution effects; updated reference to Solent Recreation Mitigation Strategy	Jonathan Pearson David Green	Jonathan Pearson Jeremy Owen	Jeremy Owen



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1 Introduction

- 1.1 LUC has been commissioned by New Forest National Park Authority (NFNPA' or 'the Authority') to carry out a Habitats Regulations Assessment (HRA) of its Local Plan 2016-2036. This report presents the methodology and findings of that HRA.

Background to preparation of the Local Plan 2016-2036

- 1.2 The Government has made National Park Authorities the sole planning authorities for their areas, including responsibilities for plan-making, enforcement, development control and minerals and waste planning. The planning system is a vital tool in helping to deliver the two statutory purposes of National Parks¹ and the related socio-economic duty².
- 1.3 The first set of dedicated planning policies for the whole of the New Forest National Park was adopted in December 2010 in the form of a Core Strategy and Development Management Policies Development Plan Document.
- 1.4 The national planning system has changed significantly in recent years and NFNPA is therefore updating its planning policies to ensure that they continue to provide a clear framework for planning decisions in the Park. Once adopted, the 'Local Plan 2016-2036' will set out the planning framework for the National Park, including the scale and location of new development and the need to conserve the local distinctiveness of the area.
- 1.5 Development of the Local Plan 2016-2036 started in summer 2015 and included a formal public consultation on the main issues to be addressed. NFNPA also launched a 'Call for Sites' process through which landowners and other parties were invited to put forward land which they would like to be considered for development. In October 2016 NFNPA published a Draft Local Plan for an eight-week period of public consultation. In Spring 2017 NFNPA received advice from Natural England on the issue of greenfield residential development close to the protected habitats of the National Park. This led to re-assessment of a number of the proposed Local Plan housing site allocations. Between June and July 2017, NFNPA invited feedback on potential alternative housing sites and this informed the preparation of the Regulation 19 Submission draft of the Local Plan.
- 1.6 The indicative timetable for the remaining stages of preparation of the Local Plan 2016-2036 is for Regulation 19 consultation on the Regulation 19 Submission draft in early 2018, submission to the Secretary of State in April 2018, Examination in Summer 2018, and Adoption in late 2018.

The requirement to undertake Habitats Regulations Assessment of development plans

- 1.7 The requirement to undertake HRA of development plans was confirmed by the amendments to the Habitats Regulations published for England and Wales in July 2007 and updated in 2010³ and again in 2012⁴. Therefore, when preparing its Local Plan NFNPA is required by law to carry out an HRA although consultants can undertake the HRA on its behalf. The requirement for authorities to

¹ Under the Environment Act 1995, the statutory purposes of national parks in England and Wales are: 1. Conserve and enhance the natural beauty, wildlife and cultural heritage; and 2. Promote opportunities for the understanding and enjoyment of the special qualities of national parks by the public

² Seek to foster the economic and social well-being of local communities within the national parks

³ The Conservation (Natural Habitats, &c.) (Amendment) Regulations 2007. HMSO Statutory Instrument 2007 No. 1843. From 1 April 2010, these were consolidated and replaced by the Conservation of Habitats and Species Regulations 2010 (SI No. 2010/490). Note that no substantive changes to existing policies or procedures have been made in the new version.

⁴ The Conservation of Habitats and Species (Amendment) Regulations 2012. Statutory Instrument 2012 No. 1927.

comply with the Habitats Regulations when preparing a Local Plan is explained in the government's online planning practice guidance.

- 1.8 The HRA refers to the assessment of the potential effects of a development plan on one or more European sites, including Special Protection Areas (SPAs) and Special Areas of Conservation (SACs):
- SACs are designated under the European Habitats Directive and targets particular habitat types (Annex 1) and species (Annex II). The listed habitat types and species are those considered to be most in need of conservation at a European level (excluding birds).
 - SPAs are classified in accordance with Article 4(1) of the European Union Birds Directive⁵ for rare and vulnerable birds (as listed in Annex I of the Directive), and under Article 4(2) for regularly occurring migratory species not listed in Annex I.
- 1.9 Potential SPAs (pSPAs)⁶, candidate SACs (cSACs)⁷, Sites of Community Importance (SCIs)⁸ and Ramsar sites should also be included in the assessment.
- Ramsar sites support internationally important wetland habitats and are listed under the Convention on Wetlands of International Importance especially as Waterfowl Habitat (Ramsar Convention, 1971).
- 1.10 For ease of reference during HRA, these designations can be collectively referred to as European sites⁹, despite Ramsar designations being at the international level.
- 1.11 The overall purpose of the HRA is to conclude whether or not a proposal or policy, or whole development plan, would adversely affect the integrity of the European site in question either alone or in combination with other plans and projects. This is judged in terms of the implications of the plan for the 'qualifying features' for which the site was designated, i.e.:
- SACs – Annex I habitat types and Annex II species; as listed in the site's citation on the JNCC website (all features of European importance, both primary and non-primary, need to be considered);
 - SPAs – Annex 1 birds and regularly occurring migratory species not listed in Annex I, as identified in sections 3.1, 3.2 and 4.2 of the SPA's standard data form on the JNCC website;
 - Ramsar sites – the reasons for listing the site under the Convention, as set out in section 14 of the relevant 'Information Sheet on Ramsar Wetlands' available on the JNCC website.
- 1.12 Significantly, HRA is based on the precautionary principle meaning that where uncertainty or doubt remains, an adverse impact should be assumed.

Stages of HRA

- 1.13 Table 1.1 summarises the stages typically involved in carrying out an HRA, based on various guidance documents^{10,11,12}.

⁵ Directive 2009/147/EC (Birds Directive) on the conservation of wild birds (the codified version of Council Directive 79/409/EEC as amended)

⁶ Potential SPAs are sites that have been approved by Government and are currently in the process of being classified as SPAs.

⁷ Candidate SACs are sites that have been submitted to the European Commission, but not yet formally adopted.

⁸ SCIs are sites that have been adopted by the European Commission but not yet formally designated as SACs by the Government.

⁹ The term 'Natura 2000 sites' can also be used interchangeably with 'European sites' in the context of HRA, although the latter term is used throughout this report.

¹⁰ *Assessment of plans and projects significantly affecting Natura 2000 sites. Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC.* European Commission Environment DG, November 2001.

¹¹ *Planning for the Protection of Natura 2000 sites. Guidance for Regional Spatial Strategies and Local Development Documents.* Department for Communities and Local Government (DCLG), August 2006.

¹² *The Appropriate Assessment of Spatial Plans in England. A guide to why, when and how to do it.* RSPB. August 2007.

Table 1.1 Stages of HRA

Stage	Task	Outcome
Stage 1: Screening (the 'Significance Test')	<p>Description of the plan.</p> <p>Identification of potential effects on European sites.</p> <p>Assessing the effects on European sites (taking into account potential mitigation provided by other policies in the plan).</p>	<p>Where effects are unlikely, prepare a 'finding of no significant effect report'.</p> <p>Where effects judged likely, or lack of information to prove otherwise, proceed to Stage 2.</p>
Stage 2: Appropriate Assessment (the 'Integrity Test')	<p>Gather information (plan and European sites).</p> <p>Impact prediction.</p> <p>Evaluation of impacts in view of conservation objectives.</p> <p>Where impacts considered to affect qualifying features, identify alternative options.</p> <p>Assess alternative options.</p> <p>If no alternatives exist, define and evaluate mitigation measures where necessary.</p>	<p>Appropriate Assessment report describing the plan, European site baseline conditions, the adverse effects of the plan on the European site, how these effects will be avoided through, firstly, avoidance, and secondly, mitigation including the mechanisms and timescale for these mitigation measures.</p> <p>If effects remain after all alternatives and mitigation measures have been considered proceed to Stage 3.</p>
Stage 3: Assessment where no alternatives exist and adverse impacts remain taking into account mitigation	<p>Identify and demonstrate 'imperative reasons of overriding public interest' (IROPI).</p> <p>Demonstrate no alternatives exist.</p> <p>Identify potential compensatory measures.</p>	<p>This stage should be avoided if at all possible. The test of IROPI and the requirements for compensation are extremely onerous.</p>

- 1.14 It is normally anticipated that an emphasis on Stages 1 and 2 of this process will, through a series of iterations, help to ensure that potential adverse effects are identified and eliminated through the inclusion of mitigation measures designed to avoid, reduce or abate effects. The need to consider alternatives could imply more onerous changes to a plan document. It is generally understood that so called 'imperative reasons of overriding public interest' (IROPI) are likely to be justified only very occasionally and would involve engagement with both the Government and European Commission.
- 1.15 In assessing the effects of the Local Plan in accordance with Regulation 102 of the Conservation of Habitats and Species Regulations 2012, there are potentially two tests to be applied by the competent authorities: a 'Significance Test', followed if necessary by an Appropriate Assessment which will inform the 'Integrity Test'. The relevant sequence of questions is as follows:
- Step 1: Under Reg. 102(1)(b), consider whether the plan is directly connected with or necessary to the management of the sites; if not proceed to Step 2.
 - Step 2: Under Reg. 102(1)(a) consider whether the plan is likely to have a significant effect on the site, either alone or in combination with other plans or projects (the 'Significance Test') *[These two steps are undertaken as part of Stage 1: Screening shown in Table 1.1 above.];* if so proceed to Step 3.
 - Step 3: Under Reg. 102(1), make an Appropriate Assessment of the implications for the site in view of its current conservation objectives (the 'Integrity Test'). In so doing, it is mandatory under Reg. 102(2) to consult Natural England, and optional under Reg. 102(3) to take the opinion of the general public. *[This step is undertaken during Stage 2: Appropriate Assessment shown in Table 1.1 above.]*
 - Step 4: In accordance with Reg. 102(4), but subject to Reg. 103, give effect to the land use plan only after having ascertained that the plan will not adversely affect the integrity of the European site.

- 1.16 The HRA should be undertaken by the 'competent authority', in this case NFNPA, and LUC has been commissioned to do this on the Authority's behalf. The HRA also requires close working with Natural England as the statutory nature conservation body¹³ in order to obtain the necessary information and agree the process, outcomes and any mitigation measures. The Environment Agency, while not a statutory consultee for HRA, is also in a strong position to provide advice and information throughout the process as it is required to undertake HRA for its existing licences and future licensing of activities. Consultation has also been undertaken with relevant, non-governmental conservation organisations, as described later in this report.

HRA work carried out previously

HRA of the adopted development plan

- 1.17 The adopted development plan for New Forest National Park was subject to HRA throughout its development. The final HRA documents for the adopted plan are:
- New Forest National Park Authority Core Strategy and Development Management Policies Habitat Regulations Assessment Report (prepared by Scott Wilson for the New Forest National Park Authority, January 2010).
 - New Forest National Park Authority Core Strategy and Development Management Policies Habitat Regulations Assessment Report – Addendum (prepared by Scott Wilson for the New Forest National Park Authority, May 2010).
- 1.18 The adopted SPD on 'Development Standards' (September 2012) also provides relevant information in relation to avoiding significant effects on the integrity of European sites as a result of implementing the adopted Core Strategy. In addition, an HRA Screening Report was prepared by the New Forest NPA in July 2015 in relation to the National Park Management Plan 2015-2020.
- 1.19 This body of work relating to New Forest National Park was drawn on, as appropriate, in carrying out the HRA of the Local Plan 2016-2036.

HRA at earlier stages of the Local Plan 2016-2036

- 1.20 The HRA process for the Local Plan 2016-2036 began with the production in April 2016 by LUC of a non-statutory HRA Scoping Report, which was jointly prepared with New Forest District Council (NFDC) to inform the approach to HRA of both the New Forest National Park Authority (NFNPA) Local Plan and the NFDC Local Plan. The proposed approach to HRA set out in this joint scoping document was subject to consultation with Natural England, the Royal Society for the Protection of Birds (RSPB), Hampshire and Isle of Wight Wildlife Trust (HIWWT), Dorset Wildlife Trust, Wiltshire Wildlife Trust, and NFDC during April-May 2016. Table A4.1 of Appendix 5 sets out the comments received and LUC's responses to these.
- 1.21 In August 2016 LUC then prepared an HRA Discussion Document that responded to consultation comments on the HRA Scoping Report and provided initial observations on the potential for development proposals in NFNPA's Draft Local Plan to have adverse effects on European sites, as well as commenting on mitigation available from the emerging Local Plan and from NFNPA's existing recreation mitigation strategy. This supported further informal consultation with Natural England.

Structure of this report

- 1.22 This chapter (**Chapter 1**) has introduced the requirement to undertake HRA of the Local Plan. The remainder of the report is structured as follows:
- **Chapter 2: The Local Plan** summarises the content of the Regulation¹⁹ Submission draft of the New Forest National Park Local Plan, which is the subject of this report;

¹³ Regulation 5 of *The Conservation of Habitats and Species Regulations 2010*. HMSO Statutory Instrument 2010 No. 490.

- **Chapter 3: HRA Screening methodology** sets out the approach used and the specific tasks undertaken during the screening stage of the HRA;
- **Chapter 4: HRA Screening findings** describes the findings of the screening stage of the HRA;
- **Chapter 5: Appropriate Assessment** sets out the methodology and findings of the Appropriate Assessment stage of the HRA; and
- **Chapter 6: Summary and conclusions** summarises the findings of the HRA of the Regulation 19 Submission draft of the Local Plan and provides its overall conclusions.

1.23 Appendices to this report contain information on the European sites scoped into the HRA (Appendix 1); recreation pressure in the New Forest (Appendix 2); other relevant plans and projects that could have effects in combination with the New Forest National Park Local Plan (Appendix 3); the detailed results of the initial screening of individual Local Plan policies and site allocations (Appendix 4); stakeholder comments received at earlier stages of the HRA process and how these have been taken into account (Appendix 5); and additional information relating to the Appropriate Assessment of loss or damage to offsite supporting habitat (Appendix 6).

2 The Local Plan

- 2.1 As part of its statutory planning role, NFNPA is required to prepare, monitor and review a Local Plan for the National Park. Once adopted, the Local Plan will form part of the statutory development plan (alongside any Neighbourhood Plans and the separate Minerals and Waste Local Plan) for the New Forest and is the principal guide for planning decisions within the National Park. The Local Plan focuses on the area within the National Park boundary. New Forest District Council, Wiltshire Council and Test Valley Borough Council are responsible for preparing the development plans for their respective planning areas outside the National Park.
- 2.2 The policies in the Local Plan include both strategic policies (prefixed with 'SP') and more detailed development management policies (prefixed with 'DP'). The structure and policies of the Local Plan are summarised in Table 2.1. Outlines of relevant elements of the provisions of the individual policies are provided in the screening matrix in Appendix 4.

Table 2.1 Structure and policies of New Forest National Park Local Plan

Chapter 1. Introduction
Contains no policies
Chapter 2. Profile of New Forest National Park
Contains no policies
Chapter 3. Vision and objectives
Contains no policies
Chapter 4. Strategic policies and development principles
Policy SP1: Supporting sustainable development
Policy DP2: General Development Principles
Policy SP3: Major Development in the National Park
Policy SP4: Spatial Strategy
Chapter 5. Protecting and Enhancing the Natural Environment
Policy SP5: Nature Conservation Sites of International Importance
Policy SP6: The Natural Environment
Policy SP7: Landscape Character
Policy DP8: Safeguarding and Improving Water Resources
Policy SP9: Green Infrastructure
Policy DP10: Open Space
Policy SP11: Climate Change
Policy DP12: Flood Risk
Policy DP13: Coastal Development
Policy SP14: Renewable Energy
Policy SP15: Tranquillity
Chapter 6. Protecting and Enhancing the Historic and Built Environment
Policy SP16: The Historic and Built Environment
Policy SP17: Local Distinctiveness
Policy DP18: Design Principles
Chapter 7. Vibrant Communities

Policy SP19: New residential development in the National Park
Policy SP20: Specialist Housing for Older People (Use Class C2)
Policy SP21: The size of new dwellings
Policy SP22: Land at Whartons Lane, Ashurst
Policy SP23: Land at the former Lyndhurst Park Hotel, Lyndhurst
Policy SP24: Land south of Church Lane, Sway
Policy SP25: Land adjacent to the former Fawley Power Station
Policy SP26: Land at Calshot Village
Policy SP27: Affordable Housing provision within the defined villages and on allocated sites
Policy SP28: Rural Exceptions Sites
Policy SP29: New Forest Commoners Dwellings
Policy SP30: New Forest Estate Workers Dwellings
Policy DP31: Agricultural and Forestry Workers Dwellings
Policy DP32: Removal of Agricultural Occupancy Conditions
Policy SP33: Gypsies, Travellers and Travelling Showpeople
Policy DP34: Residential Character of the Defined Villages
Policy DP35: Replacement Dwellings
Policy DP36: Extensions to Dwellings
Policy DP37: Outbuildings
Policy SP38: Infrastructure Provision and Developer Contributions
Policy SP39: Local Community Facilities
Policy DP40: Change of Use from retail in the Defined Villages
Policy DP41: Retail Development outside the Defined Villages
Chapter 8. A Sustainable Local Economy
Policy SP42: Business and Employment Development
Policy SP43: Existing Employment Sites
Policy DP44: Redevelopment of Existing Employment Sites
Policy DP45: Extensions to Non Residential Buildings and Uses
Policy SP46: Tourism Development
Policy DP47: Holiday Parks and Camp Sites
Policy SP48: The Land-based Economy
Policy DP49: Re-use of Buildings outside the defined villages
Policy DP50: Agricultural and Forestry Buildings
Policy DP51: Recreational Horse Keeping
Policy DP52: Field Shelters and Stables
Policy DP53: Maneges
Chapter 9. Transport and Access
Policy SP54: Transport Infrastructure
Policy SP55: Access
Chapter 10. Monitoring and Implementation
Contains no policies

3 HRA Screening methodology

- 3.1 HRA Screening of the Local Plan has been undertaken in line with current available guidance and good practice in order to meet the requirements of the Habitats Regulations. The tasks that have been undertaken during the screening stage of the HRA are described below.

Identification of European sites which may be affected

European sites included in the previous HRA work for the New Forest National Park

- 3.2 In the HRA work undertaken previously for NFNPA's adopted Core Strategy and Development Management Policies DPD, the following eight European sites were included:
- The New Forest SAC;
 - New Forest SPA;
 - The New Forest Ramsar site;
 - Solent Maritime SAC;
 - Solent and Isle of Wight Lagoons SAC;
 - Solent and Southampton Water SPA;
 - Solent and Southampton Water Ramsar site;
 - Mottisfont Bats SAC.
- 3.3 Mottisfont Bats SAC was originally scoped out of the HRA but was later included in the assessment following a consultation response from Natural England which advised that the SAC should be included in the scope of the HRA, due to the distance over which the qualifying bat species are known to commute for foraging.
- 3.4 Six European sites that had originally been included within the scope of the HRA for the Core Strategy were screened out at the Submission stage. This was the case for River Avon SAC, Avon Valley SPA, Avon Valley Ramsar site, Dorset Heaths SAC, Dorset Heathlands SPA and the Dorset Heathlands Ramsar site. In the case of the Avon Valley sites, these sites were scoped out of the HRA because development locations within the National Park did not derive water supplies from the Avon Valley catchment and the Environment Agency consenting regime was thought likely to avoid significant effects. The Dorset Heaths sites were scoped out because the spatial distribution of development in the National Park in relation to the Dorset Heaths meant that recreational effects on sites were not considered likely. Natural England did not object to the scoping out of these sites in its consultation responses.

European sites to be included in the HRA for the new Local Plan

- 3.5 Since Natural England did not object to the list of European sites considered in the HRA of the adopted Core Strategy and Development Management Policies DPD, the joint HRA Scoping Report for the NFDNPA and NFDC Local Plans initially proposed that the same eight sites be included in the HRA work for NFNPA's new Local Plan for the same reasons. This was subject to the caveat that if at any point information gathered during the HRA indicated that other European sites could be affected by either Local Plan, they would be considered in the assessment(s) as appropriate.
- 3.6 Further consideration of potential mechanisms for effects of the Local Plan, as documented in an internal HRA Discussion Document, and further consultation with Natural England and other stakeholder bodies indicated that the Avon Valley and Dorset Heathlands European designations should be scoped in to the HRA of the NFNPA Local Plan on a precautionary basis. This was because of the potential for loss of supporting habitat for qualifying bird populations (Avon Valley

SPA and Ramsar site, Dorset Heathlands SPA), potential air quality effects due to traffic growth on roads outside of the National Park boundary (Dorset Heaths SAC and Dorset Heathlands Ramsar site), potential recreation pressure (Avon Valley SPA and Ramsar site, Dorset Heaths SAC and SPA), and potential water quality effects from treated wastewater discharges (River Avon SAC, Avon Valley SPA, Avon Valley Ramsar site). Consultation on the HRA Scoping Report also identified a need to consider the potential for the Local Plan to have adverse effects on the River Itchen SAC in relation to water supply/changes in water quantity. Finally, Solent and Dorset Coast potential SPA (pSPA) was subject to formal consultation until January 2017 on its possible designation to protect marine feeding areas used by designated birds and has also been scoped into the HRA.

3.7 The European sites that have been considered in the HRA of the Local Plan are therefore as follows:

- River Avon SAC;
- Avon Valley SPA;
- Avon Valley Ramsar site;
- Dorset Heaths SAC;
- Dorset Heathlands SPA;
- Dorset Heathlands Ramsar site;
- Mottisfont Bats SAC;
- The New Forest SAC;
- New Forest SPA;
- The New Forest Ramsar site;
- River Itchen SAC;
- Solent and Dorset Coast pSPA;
- Solent and Isle of Wight Lagoons SAC;
- Solent Maritime SAC;
- Solent and Southampton Water SPA;
- Solent and Southampton Water Ramsar site.

3.8 The locations of the European sites above are shown in Figure 3.1. The designated features and conservation objectives of the European sites, together with current pressures on and potential threats to these are described in Appendix 1. This information was drawn from the Standard Data Forms for SACs and SPAs and the Information Sheets for Ramsar Wetlands published on the JNCC website¹⁴, Natural England's Site Improvement Plans¹⁵, conservation objectives (only available for SACs and SPAs) published on the Natural England website¹⁶, and consultation information for potential marine SPAs published by DEFRA¹⁷.

¹⁴ www.jncc.defra.gov.uk

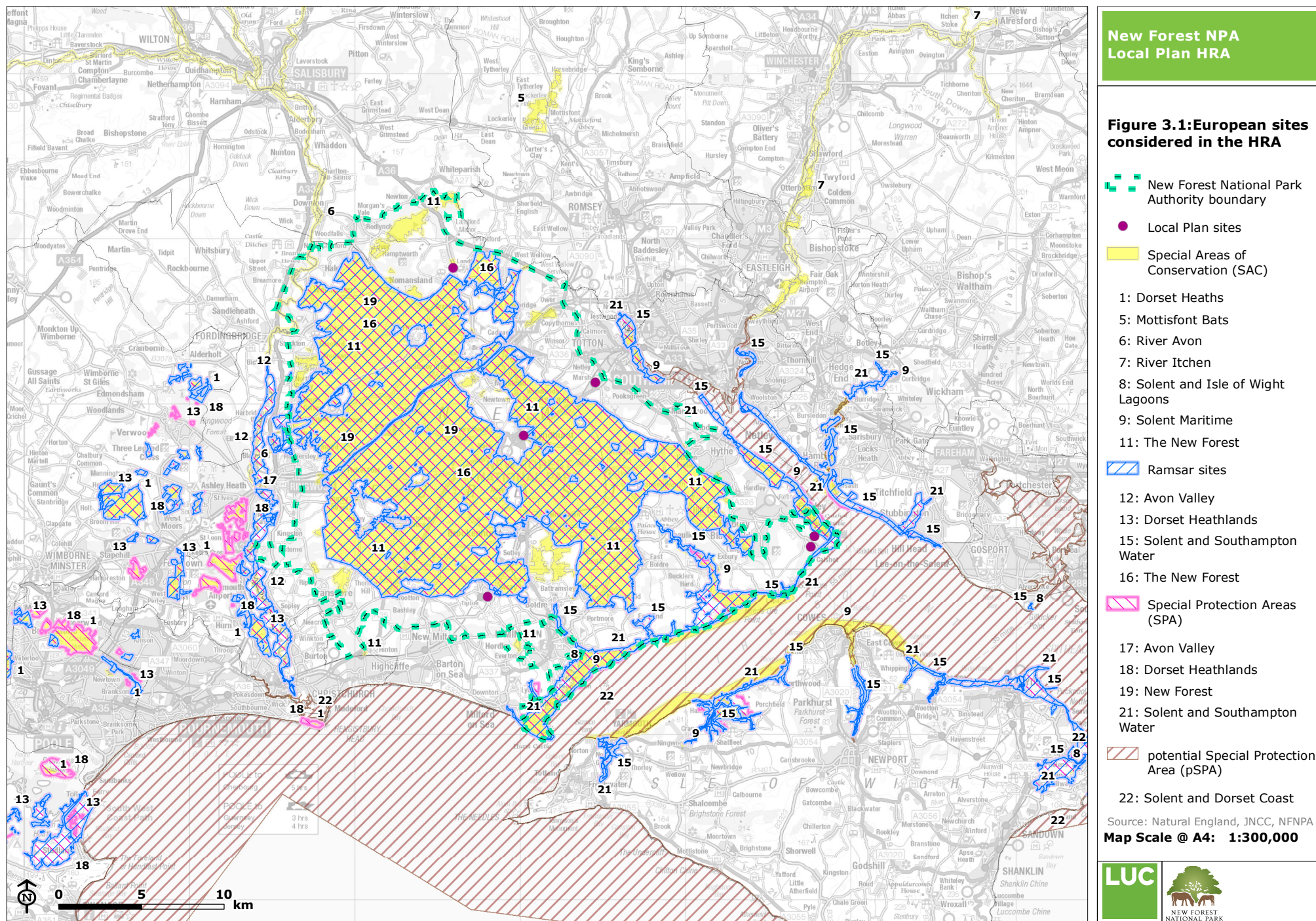
¹⁵ <http://publications.naturalengland.org.uk/category/5458594975711232>

¹⁶ <http://publications.naturalengland.org.uk/category/6490068894089216>

¹⁷ <https://www.gov.uk/government/consultations/solent-and-dorset-coast-potential-special-protection-area-comment-on-proposals>

New Forest NPA Local Plan HRA

Figure 3.1: European sites considered in the HRA



Approach to HRA Screening

- 3.9 As required under Regulation 102 of the Conservation of Habitats and Species Regulations 2010¹⁸ an assessment has been made of the 'likely significant effects' of the Local Plan. A risk-based approach involving the application of the precautionary principle was adopted in the screening assessment, such that a conclusion of 'no significant effect' was only reached where it was considered very unlikely, based on current knowledge and the information available, that a policy or site allocation would have a significant effect on the integrity of a European site.

Interpretation of 'likely significant effect'

As required under Regulation 102 of the Conservation of Habitats and Species Regulations 2010 an assessment of the 'likely significant effects' of the Local Plan has been undertaken.

Relevant case law helps to interpret when effects should be considered as a likely significant effect, when carrying out HRA of a land use plan.

In the Waddenzee case, the European Court of Justice ruled on the interpretation of Article 6(3) of the Habitats Directive (translated into Reg. 102 in the Habitats Regulations), including that:

- An effect should be considered 'likely', "*if it cannot be excluded, on the basis of objective information, that it will have a significant effect on the site*" (para 44).
- An effect should be considered 'significant', "*if it undermines the conservation objectives*" (para 48).
- Where a plan or project has an effect on a site "*but is not likely to undermine its conservation objectives, it cannot be considered likely to have a significant effect on the site concerned*" (para 47).

A recent opinion delivered to the Court of Justice of the European Union commented that:

"The requirement that an effect in question be 'significant' exists in order to lay down a de minimis threshold. Plans or projects that have no appreciable effect on the site are thereby excluded. If all plans or projects capable of having any effect whatsoever on the site were to be caught by Article 6(3), activities on or near the site would risk being impossible by reason of legislative overkill."

This opinion (the 'Sweetman' case) therefore allows for the authorisation of plans and projects whose possible effects, alone or in combination, can be considered 'trivial' or *de minimis*; referring to such cases as those "*that have no appreciable effect on the site*". In practice such effects could be screened out as having no likely significant effect; they would be 'insignificant'.

Initial screening assessment

- 3.10 An initial screening assessment was undertaken to identify which components of the Local Plan have the potential to have likely significant effects on European sites, either alone or in combination with other plans or projects and the results are recorded in the table in Appendix 4. This initial screening was undertaken prior to consideration of the mitigation which may be provided by other policies in the Local Plan or by other regulatory mechanisms. Where a policy does not have the potential to result in a likely significant effect, the relevant cell was shaded green and the policy screened out from any further assessment.
- 3.11 To reduce repetition and aid consistency, reasons for screening out policies were categorised according to the following scheme and reference made to these 'reason codes' in the 'Justification' column of the initial screening table:
- A. General statement of policy or general aspiration;
 - B. Policy listing general criteria for testing the acceptability or sustainability of proposals;
 - C. Proposal referred to but not proposed by the Local Plan;

¹⁸ SI No. 2010/490

- D. Environmental protection or site safeguarding policy;
- E. Policy or proposal which steers change in such a way as to protect European sites from adverse effects;
- F. Policy that cannot lead to development or other change;
- G. Policy or proposal that could not have any conceivable effect on a site;
- H. Policy or proposal the (actual or theoretical) effects of which cannot undermine the conservation objectives of European sites (either alone or in combination with other aspects of this or other plans or projects).

3.12 Where a component of the Local Plan could potentially have a likely significant effect, the relevant cell was shaded orange and the types of effect and potentially affected European sites were highlighted. Each type of potential likely significant effect was then subject to further screening in Chapter 4, taking into account mitigation, in order to conclude whether likely significant effects could be ruled out.

Identification of other plans and projects which may have 'in combination' effects

- 3.13 Regulation 102 of the Habitats Regulations 2010 requires an 'Appropriate Assessment' where "*a land use plan is likely to have a significant effect on a European site (either alone or in combination with other plans or projects) and is not directly connected with or necessary to the management of the site*". Therefore, as well as considering the likely effects of the Local Plan alone on European sites, it was necessary to consider whether there may be significant effects from the Local Plan in combination with other plans or projects.
- 3.14 The potential for 'in combination' effects need only be considered for those Local Plan components identified as unlikely to have a significant effect alone, but which could act in combination with other plans and projects to produce a likely significant effect. This approach accords with recent guidance on HRA¹⁹.
- 3.15 The first stage in identifying potential in combination effects involves identifying which other plans and projects in addition to the Local Plan may affect the European sites that are the focus of the HRA.
- 3.16 Case law and guidance suggest that a plan or project at any of the following stages may be relevant to the in combination assessment:
- applications lodged but not yet determined;
 - projects subject to periodic review e.g. annual licences, during the time that their renewal is under consideration;
 - refusals subject to appeal procedures not yet determined;
 - projects with consent but not yet started;
 - projects started but not yet completed;
 - known projects that do not need consent;
 - proposals in adopted plans;
 - proposals in finalised draft plans formally published or submitted for final consultation or adoption.
- 3.17 The review of other plans focussed on Local Plans for authorities adjacent to New Forest National Park as well as Minerals Local Plans, Waste Local Plans and Local Transport Plans; the findings of any associated HRA work for those plans was also reviewed, if available.

¹⁹ DTA: The Habitats Regulations Assessment Handbook: <http://www.dtapublications.co.uk/handbook/browse>

- 3.18 Based on a review of the National Infrastructure Planning website²⁰ and discussion with NFNPA, no other projects of significant scale that could result in in combination effects with the Local Plan were identified.
- 3.19 Appendix 3 presents the review of other plans and projects, outlining the components of each plan or project that could have an impact on nearby European sites and considering the findings of the accompanying HRA work, where available. The following authorities' plans and HRA work were included:
- Bournemouth Borough Council;
 - Christchurch Borough Council;
 - Dorset County Council;
 - East Dorset District Council;
 - Hampshire County Council;
 - Isle of Wight Council;
 - New Forest District Council;
 - Poole Borough Council;
 - Southampton City Council;
 - Test Valley Borough Council;
 - Wiltshire Council.
- 3.20 While this HRA report has presented the initial screening results for each policy and site allocation individually, which is consistent with current guidance, the screening assessments also considered the potential for the effects of each Local Plan component to become significant in combination with other Local Plan components or with other plans and projects.

Mitigation

- 3.21 Some of the potential effects identified during the initial HRA Screening may be mitigated by other policies in the Local Plan, or by other plans or regulatory mechanisms. Such mitigation was referenced where relevant and taken into consideration in reaching the HRA conclusions. It is not appropriate for the HRA to rely solely on generic policy protection for European sites such as that provided by the first part of Local Plan *Policy SP5: Nature Conservation Sites of International Importance* since this does not provide sufficient certainty that the mitigation could be effectively delivered when implementing the screened in policies. This policy was therefore not relied upon in the HRA. Instead, the HRA took account of existing policies or regulatory mechanisms that directly address the identified potential effect.

Methodological points established via consultation on NFDC Local Plan Part 1

- 3.22 Subsequent to consultation on the joint HRA Scoping Report for New Forest Local Plans, an HRA Discussion Document, similar to that prepared for NFNPA, was prepared in relation to the NFDC Local Plan Part 1 and was subject to consultation with the same group of stakeholders that were invited to comment on the HRA Scoping Report at a meeting on 9 August 2016 and via subsequent correspondence. Since this second round of consultation related to NFDC's Local Plan rather than NFNPA's, the consultee's comments and LUC's responses are not reproduced in full in this HRA report. However, we have outlined below the key points of agreement that are also relevant to the methodology and evidence for the HRA of NFNPA Local Plan.
- 3.23 *Indirect effects on supporting habitat* – the HRA should be limited to considering direct loss of or damage to supporting habitat beyond European site boundaries; other effects on supporting habitat such as recreation pressure are judged to be non-significant.

²⁰ National Infrastructure Planning website <http://infrastructure.planningportal.gov.uk/>

- 3.24 *Potential loss of supporting habitat to Avon Valley SPA and Ramsar site qualifying bird populations* – based on information provided by Natural England, the HRA Screening should assume that supporting habitat for Avon Valley SPA and Ramsar site qualifying bird populations only exists in the Harbridge area to the west of the European site and north of Ringwood.
- 3.25 *Water quality of Solent* – on the advice of Natural England, the HRA Screening should reference any emerging findings that are available from the South Hampshire Integrated Water Management Strategy (IWMS).
- 3.26 *Increased traffic using Roger Penny Way (B3078) across New Forest* – on the advice of Natural England, 'Traffic collision risk' should be added to the types of potential effect that were identified in the joint HRA Scoping Report.
- 3.27 *Private sewerage systems* – based on research commissioned by Natural England²¹ and discussion with Natural England, the HRA Screening should assume that, prior to mitigation, likely significant effects on water quality cannot be ruled out where development is not likely to be connected to a public sewer and is within 30 m of a European site. The HRA Screening can rely on mitigation provided by the fact that any new discharge to the ground from a septic tank or small sewage treatment plant within 50 m of a European site requires a permit from the Environment Agency.²² This should allow likely significant effects to be ruled out post-mitigation..

²¹ MAY, L., WITHERS, P.J., STRATFORD, C., BOWES, M., ROBINSON, D. & GOZZARD, E. 2015. Development of a risk assessment tool to assess the significance of septic tanks around freshwater SSSIs: Phase 1 – Understanding better the retention of phosphorus in the drainage field. Natural England Commissioned Reports, NECR171.

²² Environment Agency. (2015) *General binding rules: small sewage discharge to the ground*. [Online] Available from: <https://www.gov.uk/guidance/general-binding-rules-small-sewage-discharge-to-the-ground>

4 HRA Screening findings

- 4.1 As described in Chapter 3, a screening assessment was carried out to identify which components of the Local Plan have the potential to result in likely significant effects on European sites. The results of that initial screening are presented below followed by further assessment in relation to each type of potential likely significant effect identified in the initial screening.

Results of initial screening

- 4.2 The initial screening of each Local Plan component, prior to consideration of mitigation provided by other Local Plan policies or other policies or regulatory mechanisms, is detailed in Appendix 4.
- 4.3 It was found that likely significant effects, either from the policy alone or in-combination with other Local Plan policies or with other plans and projects, could be ruled out for most Local Plan components. This was because the policies fell into one or more of the following screening categories:
- A. General statement of policy / general aspiration;
 - B. Policy listing general criteria for testing the acceptability /sustainability of proposals;
 - D. Environmental protection / site safeguarding policy;
 - E. Policy or proposal which steers change in such a way as to protect European sites from adverse effects;
 - F. Policy that cannot lead to development or other change.
- 4.4 Some Local Plan components, however, required further assessment including consideration of available mitigation, before a screening conclusion could be reached. The Local Plan policies for which the initial screening identified a potential for likely significant effects and the types of potential effect identified are summarised in Table 4.1. The following section then considers each of these types of potential likely significant effect from the screened in components of the Local Plan in more detail, identifies the European sites potentially affected, and concludes whether further evidence gathering and/or an Appropriate Assessment is required.

Table 4.1: Elements of Local Plan flagged for further screening

Screened in policy	Amount, type and location of development	Potentially significant effects
Policy SP4: Spatial Strategy	The 'Defined Villages' of Ashurst, Brockenhurst, Lyndhurst, and Sway are the main focus for development of housing, employment, retail and community facilities	Direct loss or physical damage to European sites Loss or damage to offsite supporting habitat Urban edge effects Changes in air quality Traffic collision risk Recreation pressure Changes in water quantity Changes in water quality
Policy SP19: New residential development in the National Park	800 dwellings comprising site allocations (300); extant planning permissions (100); windfalls (400)	As for Policy SP4

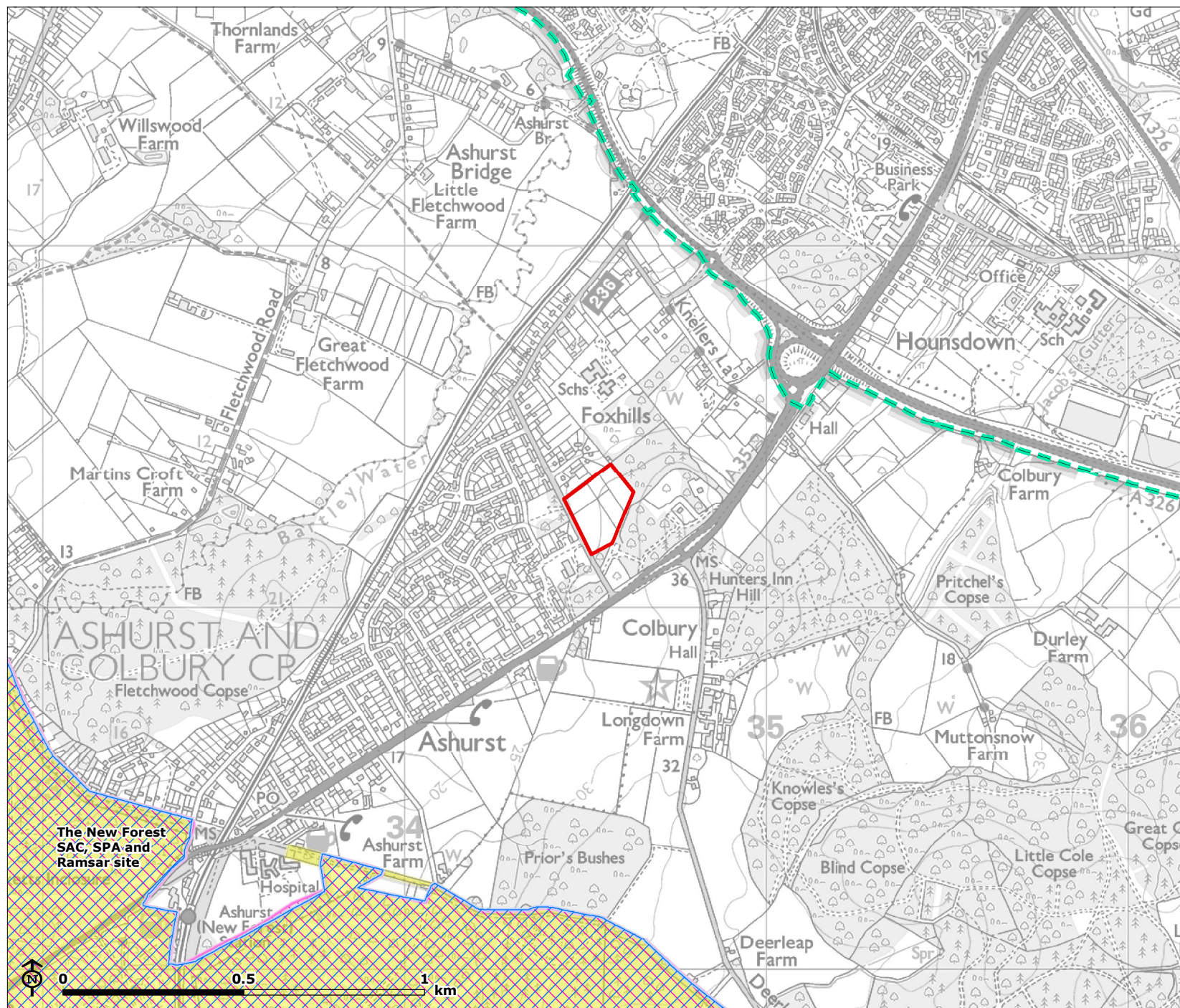
Screened in policy	Amount, type and location of development	Potentially significant effects
Policy SP20: Specialist Housing for Older People (Use Class C2)	Specialist housing for older people to be focussed in the Defined Villages	As for Policy SP4
Policy SP22: Land at Whartons Lane, Ashurst	60 dwellings	As for Policy SP4
Policy SP23: Land at the former Lyndhurst Park Hotel, Lyndhurst	50 dwellings + tourism use	As for Policy SP4
Policy SP24: Land south of Church Lane, Sway	40 dwellings on part of site more than 400 m from New Forest SPA	As for Policy SP4
Policy SP25: Land adjacent to the former Fawley Power Station	120 dwellings, habitat mitigation, supporting infrastructure, community facilities (including a primary school)	As for Policy SP4
Policy SP26: Land at Calshot Village	30 dwellings + cemetery use	As for Policy SP4
Policy SP33: Gypsies, Travellers and Travelling Showpeople	1 additional pitch	As for Policy SP4

- 4.5 The locations of the development allocations made by Policies SP22-S26 and Policy SP33 are illustrated in Figure 4.1 to Figure 4.5.

New Forest NPA Local Plan HRA

**Figure 4.1: Land at
Whartons Lane, Ashurst
(Policy SP22)**

-  Local Plan allocation site
-  New Forest National Park Authority boundary
-  Special Areas of Conservation (SAC)
-  Ramsar sites
-  Special Protection Areas (SPA)

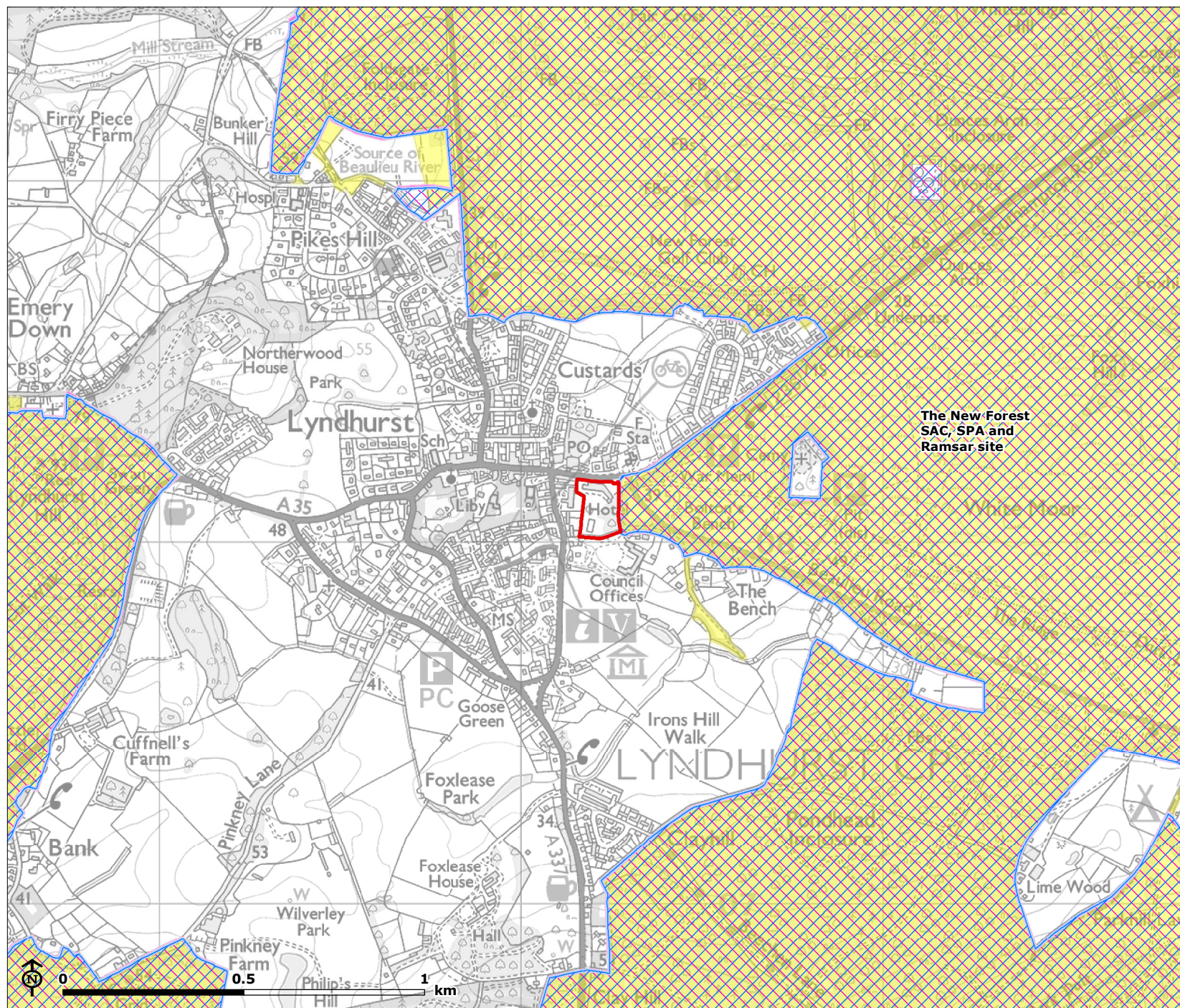


Source: Natural England, JNCC, NFNPA
Map Scale @ A4: 1:15,000



New Forest NPA Local Plan HRA

Figure 4.2: Land at the former Lyndhurst Park Hotel, Lyndhurst (Policy SP23)

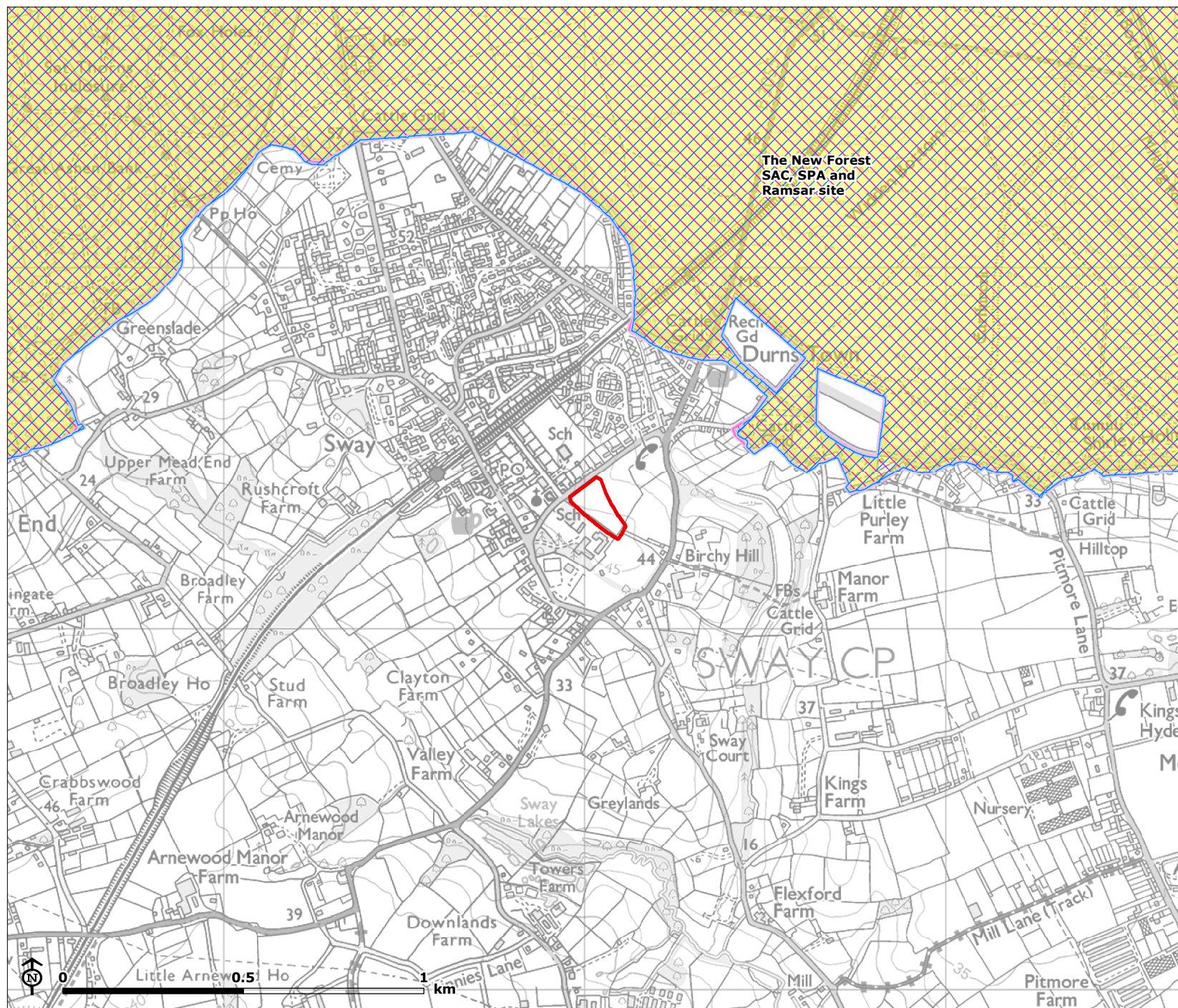


- Local Plan allocation site
- New Forest National Park Authority boundary
- Special Areas of Conservation (SAC)
- Ramsar sites
- Special Protection Areas (SPA)

Source: Natural England, JNCC, NFNPA
Map Scale @ A4: 1:15,000



Figure 4.3: Land south of Church Lane, Sway (Policy SP24)



- Local Plan allocation site
- New Forest National Park Authority boundary
- Special Areas of Conservation (SAC)
- Ramsar sites
- Special Protection Areas (SPA)

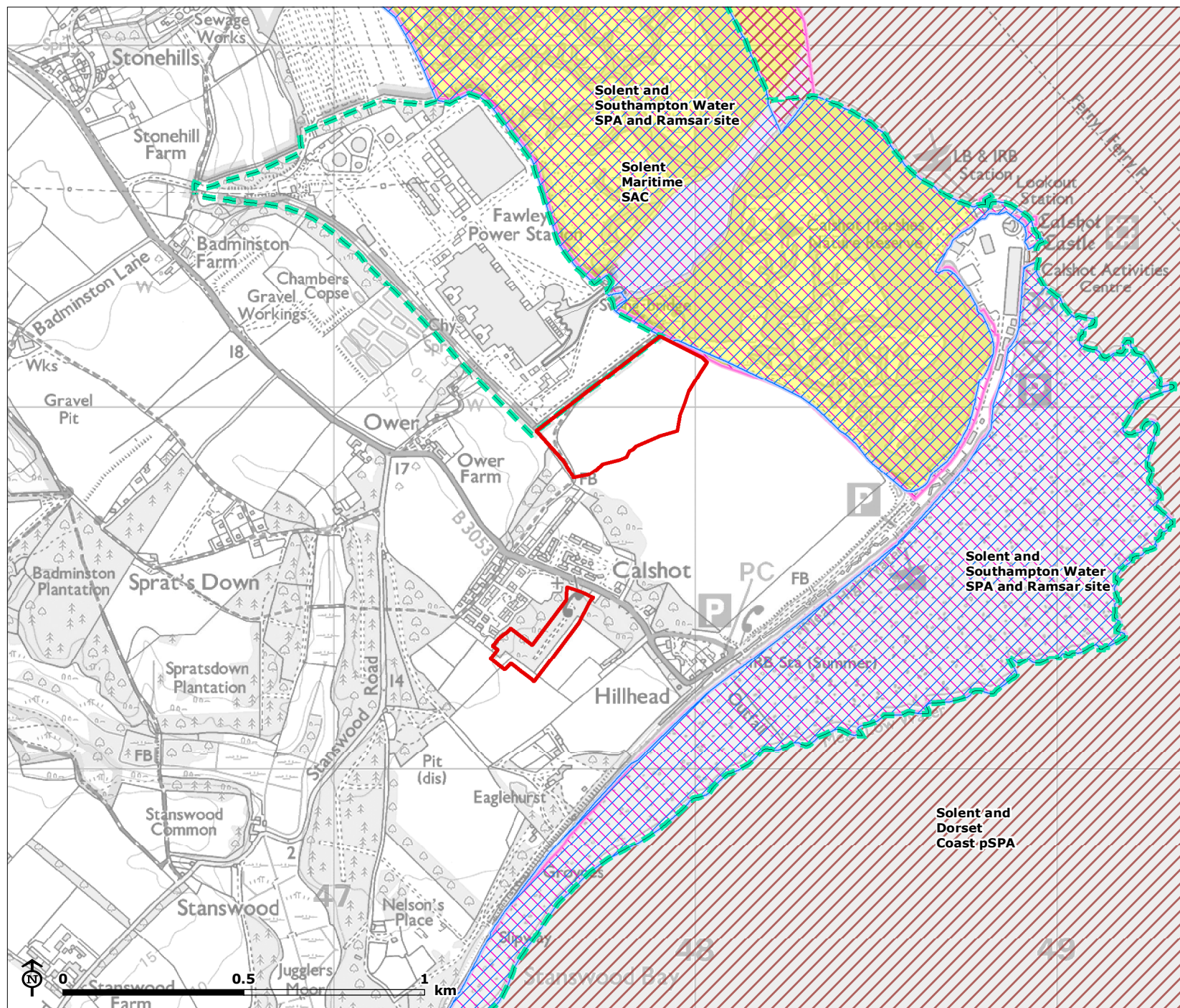
Source: Natural England, JNCC, NFNPA
Map Scale @ A4: 1:15,000



New Forest NPA Local Plan HRA

Figure 4.4: Land adjacent to the former Fawley Power Station (Policy SP25) and Land at Calshot Village (Policy SP26)

-  Local Plan allocation site
-  New Forest National Park Authority boundary
-  Special Areas of Conservation (SAC)
-  Ramsar sites
-  Special Protection Areas (SPA)
-  potential Special Protection Area (pSPA)



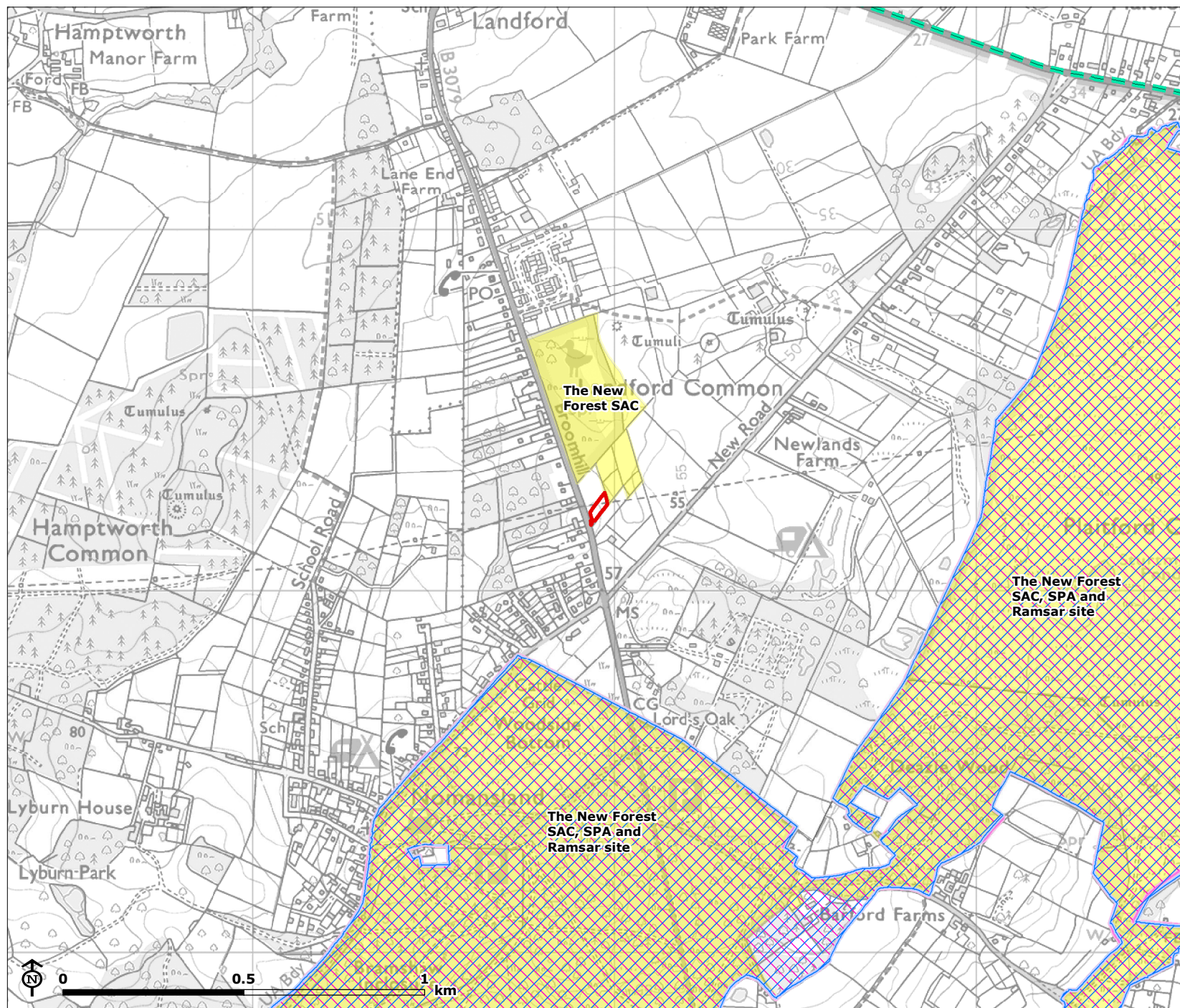
Source: Natural England, JNCC, NFNPA
Map Scale @ A4: 1:15,000



New Forest NPA Local Plan HRA

**Figure 4.5: Gypsy site at
Forest View, Landford
(Policy SP33)**

-  Local Plan allocation site
-  New Forest National Park Authority boundary
-  Special Areas of Conservation (SAC)
-  Ramsar sites
-  Special Protection Areas (SPA)



Source: Natural England, JNCC, NFNPA
Map Scale @ A4: 1:15,000



Assumptions and information used in further screening

- 4.6 There are many uncertainties associated with assessing the potential for particular types of development to significantly affect European sites therefore, to guide the assessment process and assist consistency and transparency, a number of assumptions were made. These primarily seek to establish 'zones of influence' within which certain types of effect are capable of being significant or relevant significance thresholds or limits. Where possible, reference was made to relevant standards or research but in many cases it was necessary to base the assumptions on professional judgement, discussion with stakeholders²³ and current practice in HRA. The basis for the assumptions is documented in the assumptions section of each type of effect considered below. For the spatially specific components of the Local Plan, screening for many of the potential types of likely significant effects was carried out using GIS data to determine the proximity of development locations to the scoped-in European sites; these distances were then compared to the assumed zones of influence.

Direct loss or physical damage to European sites

- 4.7 This HRA topic considers the potential effects of the development proposed by the Local Plan in terms of direct loss of or physical damage to designated habitats or direct mortality of designated species.

HRA Screening assumptions

- 4.8 It was assumed that it would not be possible to rule out likely significant effects prior to mitigation if a Local Plan policy or site allocation would result in development which overlaps with any European site.
- 4.9 Habitat loss/damage and mortality of designated species on site only needed to be considered in relation to the European sites that intersect with the Local Plan area, i.e.:
- River Avon SAC;
 - Solent and Isle of Wight Lagoons SAC; Solent Maritime SAC; Solent and Southampton Water SPA and Ramsar site;
 - The New Forest SAC and Ramsar site; New Forest SPA.
- 4.10 Any amount of development proposed by the Local Plan within the boundary of a European site was assumed to give rise to a likely significant effect therefore consideration of in combination effects at the HRA Screening stage was not required.

Potential for likely significant effects from Local Plan prior to mitigation

- 4.11 The allocated development sites in the Local Plan do not overlap any European sites.
- 4.12 *Policy SP4: Spatial Strategy* and *Policy SP20: Specialist Housing for Older People* directs most development to within the defined settlement boundaries of Ashurst, Brockenhurst, Lyndhurst, and Sway where it would also avoid European sites. While the Spatial Strategy also allows for development outside of allocated sites and the four Defined Villages (for example under Policy SP28: Rural Exception Sites), this is more appropriately assessed via project level HRA as specific proposals come forward, as described in the initial screening of spatially non-specific development policies in Appendix 1.

Mitigation provided by the Local Plan

- 4.13 No mitigation measures are included in the Local Plan that are specific to the policies screened in by the initial HRA Screening or to the types of potential effect identified.

²³ Assumptions were developed in consultation with Natural England and other stakeholders, as described in Chapter 1 and Appendix 5

Conclusions and recommendations

- 4.14 **Likely significant effects** due to direct loss or physical damage due to construction within the boundaries of European sites **can be ruled out**.

Loss or damage to offsite supporting habitat

- 4.15 This section of the HRA Screening examines the potential for direct loss of or physical damage by development to habitats that are located beyond designated site boundaries but which are relied upon by designated species populations of scoped-in European sites.

HRA Screening assumptions

- 4.16 It was assumed that it would not be possible to rule out likely significant effects prior to mitigation if a Local Plan policy or site allocation would result in development that:
- is used by the qualifying bird populations of Avon Valley SPA and Ramsar site; Dorset Heathlands SPA; New Forest SPA; Solent and Dorset Coast pSPA; or Solent and Southampton Water SPA and Ramsar site; or
 - that overlaps offsite habitat areas of importance to the qualifying bat population of Mottisfont Bats SAC. Based on the SAC's 'Protocol for Planning Officers'²⁴, HRA Screening assumed that likely significant effects prior to mitigation cannot be ruled out for any development within 7.5 km of the SAC which would result in loss of or damage to open water, deciduous woodland, riparian, or unimproved grassland habitats or in construction of a significant linear feature such as a new road.
- 4.17 Any amount of development proposed by the Local Plan within an area of potential supporting habitat was assumed to give rise to a likely significant effect, therefore consideration of in combination effects at the HRA Screening stage was not required.

Potential for likely significant effects from Local Plan prior to mitigation

Supporting habitat for qualifying birds

- 4.18 The Local Plan allocates a number of development sites in areas where qualifying bird species may make use of offsite habitat for foraging, roosting and loafing. The European sites' bird populations that could potentially be affected are those that are qualifying features of Avon Valley SPA and Ramsar site, Dorset Heathlands SPA, New Forest SPA, or Solent and Southampton Water SPA and Ramsar site. In line with comments provided by Natural England and HIWWT during the consultation process, a detailed desk-based study was necessary to determine whether adverse effects on the integrity of these sites could be ruled out.

Supporting habitat for qualifying bats

- 4.19 The Local Plan does not allocate any development sites within 7.5 km of the Mottisfont Bats SAC.

Mitigation available

- 4.20 No mitigation measures are included in the Local Plan that are specific to the policies screened in by the initial HRA Screening or to the types of potential effect identified.

Conclusions and recommendations

Supporting habitat for qualifying birds

- 4.21 **Likely significant effects cannot be ruled out** from the Local Plan site allocations on offsite habitat used by the qualifying bird species of the Avon Valley SPA and Ramsar site, Dorset Heathlands SPA, New Forest SPA, or Solent and Southampton Water SPA and Ramsar site. An **Appropriate Assessment was therefore carried out**, as described in Chapter 5.

²⁴ Mottisfont Bats Special Area of Conservation (SAC) Protocol for Planning Officers: Report to Natural England, Jonathan Cox Associates, 2010.

Supporting habitat for qualifying bats

- 4.22 Based on the absence of proposed development within the 7.5 km zone of influence defined by the Mottisfont Bats SAC 'Protocol for Planning Officers'²⁵, **likely significant effects can be ruled out.**

Urban edge effects

- 4.23 A variety of different types of effect are associated with increased human populations close to sensitive European sites (e.g. noise pollution, light pollution, increased numbers of predators such as foxes and crows, increased incidence of fires, etc.). This HRA topic considers the potential effects of the Local Plan relating of these 'urban edge effects'.

HRA Screening assumptions

- 4.24 Based on the HRA work carried out for adopted Local Plan documents plus discussion with Natural England, the most important types of urban edge effect in the context of development in the New Forest National Park are thought to be:
- Cat predation - hunting by domestic cats;
 - Increased fly-tipping - particularly risk of introduction of invasive alien species from garden waste.
- 4.25 It was therefore assumed that the potential for urban edge effects to be significant only exists for residential development (including gypsy and traveller sites and rural exception sites but excluding visitor accommodation/ tourism use as it is unlikely that these will be associated with cats on the premises or domestic garden waste). The HRA Screening assumed that likely significant effects cannot be ruled out, prior to mitigation, if residential development will occur within 400 m of European sites with qualifying features sensitive to these types of effect. Based on their designated features and the pressures and threats facing them (see Appendix 1), these were judged to be:
- Dorset Heaths SAC and SPA (but effects on these can be ruled out as the Local Plan area is more than 400 m from the European site boundaries); and
 - New Forest SAC and SPA.
- 4.26 A distance of 400 m was chosen because:
- New Forest SPA is located within New Forest National Park and Policy CP1 of the adopted Core Strategy for New Forest NPA, which was agreed with Natural England, states that:
"...any housing that is proposed to be located within 400 metres of the boundary of the New Forest Special Protection Area (SPA) will be required to demonstrate that adequate measures are put in place to avoid or mitigate any potential adverse effects on the ecological integrity of the SPA."
 - Natural England's view, documented in The Dorset Heathlands Planning Framework 2015-2020²⁶, is that residential development within 400 m of the Dorset Heathlands European designations is likely to have a significant adverse effect, either alone or in combination with other developments due to a variety of 'urban effects', including cat predation of ground nesting birds.
 - Natural England confirmed at a New Forest HRA stakeholder meeting on 9/8/16 that it is happy with the use of a 400 m distance when screening for potential 'urban edge effects from construction or occupation of buildings' on heathland sites.

²⁵ Mottisfont Bats Special Area of Conservation (SAC) Protocol for Planning Officers: Report to Natural England, Jonathan Cox Associates, 2010.

²⁶ The Dorset Heathlands Planning Framework 2015-2020 Supplementary Planning Document: An implementation plan to mitigate the impact of new housing development upon the Dorset Heaths Special Protection Area, 2016.

- 4.27 It should be noted that while the Dorset Heathlands SPA has a number of similar designated features to New Forest SPA, the New Forest SPA is considered to be more resilient and hence less likely to suffer adverse effects on its integrity as a result of the potential harmful effects of housing within 400 m of its boundary. This is because New Forest SPA provides a larger (more than three times the area) and less fragmented area of habitat than the Dorset Heathlands SPA and therefore has a much lower edge to area ratio, so that urban edge effects are likely to be much less pronounced. As a National Park the New Forest National Park also has a more developed system of habitat and visitor management than Dorset Heathlands SPA. These important differences mean that a different approach to urban edge effects is justifiable in the New Forest compared to the virtual ban on housing development within 400 m of Dorset Heathlands SPA imposed by the Dorset Heathlands Planning Framework.

Potential for likely significant effects from Local Plan prior to mitigation

- 4.28 In total, the Draft Local Plan (Policy 18) provides for 800 new dwellings to be delivered in the National Park between 2016 and 2036, comprising 300 dwellings on allocated sites, 100 dwellings from the implementation of extant planning permissions, and 400 dwellings from windfall development (unidentified or unallocated sites).
- 4.29 Three of the Local Plan residential or mixed-use allocations are located within the 400 m zone of influence for urban edge effects on New Forest SAC and SPA, and therefore have the potential for likely significant effects on that European site. These are:
- Land at the former Lyndhurst Park Hotel, Lyndhurst (Policy SP23) – wholly within 400 m zone;
 - Land south of Church Lane, Sway (Policy SP24) – strip of land along north eastern edge of site within 400 m zone; and
 - Gypsies, Travellers and Travelling Showpeople (Policy SP33) – existing gypsy site at Forest View, Landford is adjacent to the New Forest SAC.
- 4.30 Proposals with extant planning permissions will have been subject to project level HRA if required and to the adopted Core Strategy Policy CP1 which requires that adequate measures are put in place to avoid or mitigate any potential adverse effects on the ecological integrity of the SAC and SPA so it is assumed that this development will not give rise to likely significant effects.
- 4.31 In addition to Local Plan allocations, some of the 400 dwellings estimated to come forwards within the plan period as windfall development are likely to be within the 400 m zone of influence for urban edge effects on New Forest SAC and SPA. This is particularly likely since *Policy SP4: Spatial Strategy* prioritises development in the four Defined Villages (Ashurst, Brockenhurst, Lyndhurst, and Sway), all of which are partially within the 400 m zone of influence. The housing provision to be met by windfalls equates to an average of 20 new dwellings per annum and individual windfall development proposals are therefore likely to be substantially smaller. In contrast, Local Plan allocations are used to bring forward larger scale developments with site allocations ranging in size from 30 dwellings to 120 dwellings.
- 4.32 Due to the expected small scale and wide distribution of individual windfall developments it was judged that these are not likely to give rise to significant urban edge effects on New Forest SAC or SPA, either individually or in combination with other windfall developments within 400 m of the New Forest SAC and SPA. This approach is also broadly consistent with the approach to 'Urbanisation' effects that was found to be acceptable in the HRA of the adopted NFNPA Core Strategy. In the event that a larger number of windfall dwellings were to come forward on a single site or closely related cluster of sites within 400 m of the New Forest SAC and SPA, reliance can be placed on the Habitats Regulations' requirement for individual projects to also be subject to HRA.

Mitigation available

- 4.33 As noted at paragraph 3.21 above, it is not considered appropriate for the HRA to rely solely on the generic protection for European sites offered by *Policy SP5: Nature Conservation Sites of International Importance*. It is nonetheless relevant to note that the policy states that avoidance or mitigation may not be possible in some cases due to the scale, type, or proximity of the proposed development in relation to European sites and that each case will therefore be assessed on its merits. Supporting text notes that if a larger number of windfall dwellings were to come

forward on a single site or closely related cluster of sites within 400 m of the New Forest SAC and SPA, then the Authority will require the applicant to supply sufficient evidence for an Appropriate Assessment of the urban edge effects.

- 4.34 Policy SP5 highlights the opportunity for proposals to avoid or fully mitigate any likely significant effects on European sites by putting in place sufficient and effective measures and to secure mitigation via contributions to the Authority's Habitat Mitigation Scheme and/or the Solent Recreation Mitigation Partnership's Scheme. NFNPA's revised Habitat Mitigation Scheme²⁷ is, however, focussed on alleviating the potential in combination effects of recreation pressure on New Forest SAC, SPA and Ramsar site (which could arise from residential development or visitor accommodation anywhere in the Plan area) rather than urban edge effects (which could arise from residential development within 400 m of the New Forest SAC and SPA). The key elements of the revised scheme are: access management within the New Forest European designations; alternative recreation sites and routes outside the designated sites; education, awareness and promotion; monitoring and research; and in-perpetuity funding.
- 4.35 In LUC's view, it is not possible to rule out the potential for urban edge effects such as cat predation or fly-tipping from residential allocations within 400 m of New Forest SAC or SPA by reliance on contributions to NFNPA's Habitat Mitigation Scheme since it is not clear that any of the scheme elements would address these types of effect.
- 4.36 HRA of the Local Plan did not initially identify any policies that specifically addressed the potential urban edge effects from development of land at the former Lyndhurst Park Hotel, Lyndhurst (Policy SP23) or the additional gypsy and traveller pitch at Forest View, Landford (Policy SP33). This resulted in the Draft HRA making recommendations for additional safeguards within these policies and these have now been implemented as follows:
- *Policy SP23 Land at the former Lyndhurst Park Hotel, Lyndhurst* – the policy requires that development proposals incorporate measures to mitigate potential significant urban edge impacts on the adjacent protected habitats; supporting text notes that urban edge impacts to be considered include cat predation and the introduction of invasive species from fly-tipping of garden waste and that mitigation measures could include the use of legal covenants and arrangements for grounds maintenance.
 - *Policy SP33: Gypsies, Travellers and Travelling Showpeople* - due to the proximity of the New Forest SAC, measures must be put in place to adequately mitigate the potential for the introduction of invasive species from fly tipping of garden waste.
- 4.37 Policy SP24 avoids the potential for likely significant urban edge effects by a stipulation that residential development on the site will be limited to the part of the site that is located more than 400 m from New Forest SPA; instead, informal recreation use is supported along the north eastern edge of the site that is within 400 m of the SPA.

Conclusions and recommendations

- 4.38 As described above, it was possible to rule out likely significant urban edge effects on New Forest SAC or SPA, from windfall development due to the expected small scale and wide distribution of individual windfall developments.
- 4.39 Specific risks were initially identified from the residential allocations within 400 m of New Forest SAC or SPA made by *Policy SP23: Land at the former Lyndhurst Park Hotel, Lyndhurst* and on New Forest SAC from the allocation of an additional gypsy and traveller pitch at Forest View, Landford (Policy SP33). This resulted in additional safeguards being added to these allocation policies, as described above.
- 4.40 **Likely significant urban edge effects from the Local Plan can therefore be ruled out, either alone or in combination.**

²⁷ This mitigation scheme was previously set out in the adopted Development Standards SPD but reference here is to the Revised Habitat Mitigation Scheme currently in draft

Changes in air quality

- 4.41 This HRA topic considers the potential effects of the Local Plan in terms of air pollution from new or more congested roads as a result of new development, resulting in toxic contamination or nutrient enrichment of habitats.

HRA Screening assumptions

- 4.42 Increased traffic flows as a result of the amount and broad location of development proposed by the Local Plan alone or in-combination with other drivers of traffic growth could adversely affect local air quality. This is a potentially significant issue for the HRA where roads are located close to European sites that are sensitive to air pollution (principally nitrogen deposition).
- 4.43 The assessment methodology in the Design Manual for Roads and Bridges (Department for Transport, 2007) states that there is a potential for likely significant effects where road corridors are within 200 m of a European site having interest features that are sensitive to changes in air quality.

Potential for likely significant effects from Local Plan prior to mitigation

- 4.44 Based on an examination of their interest features and their locations, scoped-in European sites that may be sensitive to changes in air quality that are within 200 m of major roads (motorways or 'A' roads) are:
- Dorset Heaths SAC and Dorset Heathlands Ramsar site;
 - The New Forest SAC and Ramsar site; New Forest SPA;
 - Solent Maritime SAC;
 - Solent and Southampton Water SPA and Ramsar site.
- 4.45 Natural England's Site Improvement Plans²⁸ list air pollution in the form of atmospheric nitrogen deposition as a current pressure or future threat to all of these European sites.
- 4.46 A review of the Air Pollution Information System (APIS) website indicates that rates of Nitrogen deposition exceed critical loads²⁹ for some sensitive features of Dorset Heaths SAC, The New Forest SPA, New Forest SPA,; and Solent Maritime SAC.
- 4.47 An Air Quality Management Area (AQMA) has been designated in Lyndhurst High Street due to the presence of excessive transport related pollutants. Whilst AQMAs are designated to protect human health this nevertheless indicates the presence of existing high levels of nitrogen dioxide pollution in a location where 50 additional dwellings are allocated (Policy SP23) and which is adjacent to the New Forest European sites.
- 4.48 The Transport and Access section of the Local Plan states that there are high levels of commuter traffic crossing the Park, particularly from the surrounding areas. A significant proportion of the local workforce is either self-employed and work from home (about 11%) or commute to work outside the area, particularly to Southampton. Overall there is a significant net outflow of people from the National Park travelling to work in urban areas such as Southampton (providing employment for 15% of the National Park's working population) and Bournemouth (providing employment for 8% of the National Park's working population). The Local Plan also notes that road traffic volumes across the National Park are high, especially during the summer months, and that trends indicate a general increase each year on a number of routes.
- 4.49 The National Park receives an estimated 13.5 million visitor days each year, with the vast majority of both staying and day visitors using the car to reach their destination³⁰. Thus, while the amount of traffic growth associated with the small scale of development proposed by the Local Plan alone is unlikely to be significant, when this is combined with commuter and visitor traffic

²⁸ <http://publications.naturalengland.org.uk/category/5458594975711232>

²⁹ Comparing maximum deposition rates to the lower end of the stated critical load ranges on a precautionary basis

³⁰ Tourism South East visitor survey 2004-2005

growth from neighbouring areas, roads within and close to the New Forest could experience a significant increase in road traffic and associated air pollution.

Mitigation available

- 4.50 The Local Plan resists major development within the National Park (Policy SP3) and seeks to direct most supported housing and employment development to its larger settlements, which have most services, facilities and local employment opportunities (Policy SP4), helping to reduce the need to travel. The Local Plan resists expansion of development of strategic transport infrastructure in the National Park (Policy SP54) which would include the strategic road network. It also supports appropriate improvements to more sustainable forms of transport (Policy SP55) which should help to limit road traffic growth.

Conclusions and recommendations

- 4.51 The development proposed by the Local Plan is small in scale and focussed on relatively sustainable locations adjacent to existing, larger settlements in New Forest National Park. This together with the support for more sustainable forms of transport and resistance to strategic transport development means it is reasonable to conclude that traffic growth and associated increases in air pollution from the Local Plan alone are unlikely to be significant. However, as acknowledged in the Local Plan, traffic flows within and across the National Park relating to visitors and commuters are large and growing.
- 4.52 It was therefore recommended that a more detailed examination of potential in-combination air quality effects on the Dorset Heaths, New Forest and Solent European sites listed at paragraph 4.44 above be carried out. In response, NFNPA and NFDC jointly commissioned third party consultants to carry out an air quality assessment³¹ and linked ecological assessment³² which are reported on separately and together constitute the HRA of air quality effects for both the New Forest National Park and New Forest District Local Plans; at the time of writing, these documents had not yet been finalised although draft results and conclusions are presented within them. The results and conclusions of the HRA in relation to changes in air quality are set out in those separate reports but for ease of reference their emerging draft conclusions are also summarised below.
- 4.53 The draft air quality assessment³³ concludes that it is not possible to discount the potential for significant effects in relation to increased NOx concentrations, nutrient nitrogen deposition, or increased ammonia concentrations without further analysis of the sensitivity of designated habitats to these impacts at identified locations.
- 4.54 The draft ecological assessment concludes as follows for the various European sites considered.

The New Forest SAC, SPA and Ramsar site

- 4.55 Implementation of the NFNPA Local Plan and NFDC Local Plan in isolation is not likely to have a significant effect on the New Forest SAC, SPA and Ramsar site. **In combination effects will result in exceedances for ammonia and acid deposition**, although exceedance of critical loads / levels is also predicted in the absence of the Local Plans. Advice published by APIS³⁴ indicates that site-specific information on the effects of ammonia and acid deposition on vegetation is limited. The ecological assessment therefore **recommends that NFNPA and NFDC undertake periodic vegetation monitoring** to determine the current condition of sensitive vegetation and to identify any changes that occur during the life of the two Local Plans (measured at appropriate intervals). The monitoring would need to be **complemented by a mitigation strategy** that sets out actions that will be implemented if required. Habitat management measures that can be used to mitigate the impact of airborne pollutants are also summarised in the ecological assessment.

³¹ Air Quality Consultants (2017) Air quality input for Habitats Regulations Assessment: New Forest – Draft Report provided 21 December 2017

³² BSG Ecology (2018) Ecological Consultancy Advice on Air Quality Risks – Draft Report provided 3 January 2018

³³ Air Quality Consultants (2017) Air quality input for Habitats Regulations Assessment: New Forest – Draft Report provided 21 December 2017

³⁴ <http://www.apis.ac.uk/>

Dorset Heaths SAC and Dorset Heathlands SPA and Ramsar site

- 4.56 Implementation of the NFNPA Local Plan and NFDC Local Plan is not likely to have a significant effect on the Dorset Heaths SAC or the Dorset Heathlands SPA and Ramsar site. Although the resultant increase in traffic will result in localised exceedances of the screening criteria and critical levels or loads, this is likely to be mitigated in part by existing vegetation alongside roads. Where impacts do occur it is expected that they will be limited in their extent and area.

Solent Maritime SAC

- 4.57 Implementation of the NFNPA Local Plan and NFDC Local Plan is not likely to have a significant effect on the Solent Maritime SAC. The modelling scenarios employed mean that this conclusion is also reached when considering the effects of the Local Plan in combination with other plans and projects.

Solent and Southampton Water SPA and Ramsar site

- 4.58 Implementation of the NFNPA Local Plan and NFDC Local Plan is not likely to have a significant effect on the Solent and Southampton Water SPA and Ramsar site. The modelling scenarios employed mean that this conclusion is also reached when considering the effects of the Local Plan in combination with other plans and projects.

Traffic collision risk

- 4.59 Correspondence with Natural England³⁵ identified a type of potential adverse effect not previously included in the joint HRA Scoping document for NFDC and NFNPA: the responsible officer for the New Forest expressed concerns that development could result in an increase in traffic using Roger Penny Way (B3078 across the northern part of the New Forest) and roads near Hordle, making them unsafe for grazing animals and necessitating fencing along the roadsides. If fencing is needed to protect animals, changes to the grazing pattern in the New Forest could, without mitigation, lead to loss of open habitats for which New Forest SAC and Ramsar site is designated, with knock-on effects on New Forest SPA designated bird species and New Forest Ramsar site fauna reliant on those habitats. There is potential for similar problems to arise close to all road commuting routes across the New Forest where conservation grazing is important for habitat management.

HRA Screening assumptions

- 4.60 In the absence of any other benchmark, HRA Screening assumed that likely significant effects due to traffic collision risk cannot be ruled out where transport modelling indicates that road traffic growth from the Local Plan, alone or in-combination with other plans and projects, will exceed 8,000 AADT (the figure provided by the Design Manual for Roads and Bridges, volume 11, to indicate a scale of traffic flows on a new road that would begin to result in moderate severance of a community). This threshold was agreed with Natural England.

Potential for likely significant effects from Local Plan prior to mitigation

- 4.61 Hordle is some distance from the European sites of the New Forest and there is therefore limited potential for likely significant effects. In relation to Roger Penny Way, none of the development sites allocated by the Local Plan is close to this route. Small increases in traffic on Roger Penny Way may, however, result from windfall development and other routes crossing the New Forest European designations are also likely to see some traffic increases from the development proposed by the Local Plan.
- 4.62 As described under the 'Changes in air quality' topic above, while the amount of traffic growth associated with the small scale of development proposed by the Local Plan alone is unlikely to be significant, when this is combined with commuter and visitor traffic growth from neighbouring areas, roads within and close to the New Forest could experience a significant increase in road traffic.

³⁵ Dated 22 August 2016, following up on various point discussed at a 9 August 2016 stakeholder consultation meeting

Mitigation available

- 4.63 Local Plan policies will help to limit traffic growth, as described under 'Changes in air quality' above. It is assumed that traffic modelling represents the expected future traffic flows after the effects of these policies.

Conclusions and recommendations

- 4.64 The development proposed by the Local Plan is small in scale and focussed on relatively sustainable locations adjacent to existing, larger settlements in New Forest National Park. This together with the support for more sustainable forms of transport and resistance to strategic transport development means it is reasonable to conclude that traffic growth from the Local Plan alone is unlikely to be significant. However, as acknowledged in the Local Plan, traffic flows within and across the National Park relating to visitors and commuters are large and growing and there is therefore a potential for effects to be significant in combination.
- 4.65 At the time that the 8,000 AADT screening threshold for in combination traffic growth was agreed with Natural England it was anticipated that the air quality study would report traffic growth in a suitable format to allow identification of roads running within or alongside the New Forest European sites where traffic growth is forecast to exceed this figure. NFDC, which commissioned this work joint work to inform HRA of both the New Forest District and National Park Local Plans, reports that the approach taken to traffic modelling means that these in combination traffic growth figures cannot readily be reported. The HRA has therefore assumed on a precautionary basis that in combination traffic growth may exceed 8,000 AADT and has proceeded to an Appropriate Assessment of the potential for traffic collision risk to adversely affect the integrity of the New Forest European designations.

Recreation pressure

- 4.66 This HRA topic considers the potential effects of the Local Plan in terms of:
- Designated species mortality or disturbance: direct mortality of ground nesting birds' eggs or young by visitor trampling or dogs off leads; disturbance of ground nesting birds by recreational visitors and their dogs; mortality due to increased incidence of fires; mortality due to tipping/littering.
 - Designated habitats loss or damage: path erosion or soil compaction by walkers, cyclists, horse riders etc.; eutrophication of soils by dog faeces; increased incidence of fires; tipping/littering.

HRA Screening assumptions

- 4.67 European sites scoped into the HRA which are judged to be vulnerable to recreation pressure, based on their designated features and the pressures and threats facing them (see Appendix 1) are:
- Avon Valley SPA;
 - Avon Valley Ramsar site;
 - Dorset Heaths SAC;
 - Dorset Heathlands SPA;
 - New Forest SAC;
 - New Forest SPA;
 - Solent Maritime SAC;
 - Solent and Southampton Water SPA;
 - Solent and Southampton Water Ramsar site.
- 4.68 The HRA therefore considered the potential for increased recreation pressure on these sites as follows.

Avon Valley SPA and Ramsar site

- 4.69 Dog walkers disturbing the designated population of Bewick's Swan in areas outside public rights of way are identified by the Site Improvement Plan as a concern. It is understood that Natural England has not previously been concerned about recreational pressure on this site arising from development in the New Forest, due in part to very limited public access. The Gadwall population for which the SPA is also designated is focussed on Blashford Lakes Gravel Pits which is managed as a nature reserve so access is controlled. It also seems likely that the extensive outdoor recreation opportunities within the New Forest National Park and Solent Coast European sites exert a stronger pull on many residents of New Forest District and New Forest National Park than the Avon Valley.
- 4.70 The HRA therefore assumed that recreational users of the Avon Valley are overwhelmingly local and that a potential for a contribution to in combination recreational pressure on the Bewick's Swan population only exists for any residential development or visitor accommodation within 1.0 km of Avon Valley SPA and Ramsar site.

Dorset Heaths SAC and SPA

- 4.71 Based on research into the behaviour of visitors to the Dorset Heaths^{36,37} and Natural England's views documented in The Dorset Heathlands Planning Framework 2015-2020³⁸, the HRA assumed that prior to consideration of mitigation, all residential development or visitor accommodation within 5 km of Dorset Heaths SAC or Dorset Heathlands SPA is likely to have a likely significant effect in combination.

New Forest SAC and SPA

- 4.72 Prior HRA work for the NFDC Local Plan Part 2³⁹ which is also relevant to the HRA of the NFNPA Local Plan provides a detailed review of evidence on recreation pressure on New Forest SAC and SPA; key elements of this are reproduced in Appendix 2. The HRA of the NFDC Local Plan Part 2 concludes that whilst the best available evidence is inconclusive, the risk of residential development in New Forest District leading to increased visitor pressure on the New Forest European sites cannot be ruled out for development anywhere within New Forest District. Given that the National Park is surrounded by New Forest District, it is consistent to assume that such effects cannot be ruled out for development anywhere within New Forest National Park. This evidence remains valid and the HRA of the Local Plan therefore assumed that prior to mitigation, likely significant in combination effects on New Forest SAC and SPA cannot be ruled out for any residential development or visitor accommodation within New Forest National Park.

Solent Maritime SAC, Solent and Southampton Water SPA and Ramsar site

- 4.73 The Solent Disturbance and Mitigation Project (SDMP) has established that 75% of visitors to the Solent European sites come from within 5.6 km (as the crow flies) of Solent and Southampton Water SPA and recommends that avoidance and mitigation measures be sought for residential development within this zone of impact⁴⁰. The HRA therefore assumed that prior to mitigation, likely significant in combination effects on Solent Maritime SAC and Solent and Southampton Water SPA and Ramsar site cannot be ruled out for residential development or visitor accommodation within this zone.

Potential for likely significant effects from Local Plan prior to mitigation

Avon Valley SPA and Ramsar site

- 4.74 In line with the methodology described above, it is assumed that prior to mitigation, a potential for a contribution to in combination recreation pressure on the Bewick's Swan population exists for any residential or visitor accommodation development within 1.0 km of Avon Valley SPA and

³⁶ R. T. Clarke, J. Sharp and L. D, "Access Patterns in South-east Dorset. The Dorset Household Survey: Consequences for Future Housing and Greenspace Provision," Footprint Ecology, Unpublished report, 2008.

³⁷ D. Liley, J. Sharp and C. R. T, "Access Patterns in South-east Dorset. Dorset Household Survey and Predictions of Visitor Use of Potential Greenspace Sites," Footprint Ecology, Unpublished report, 2008.

³⁸ The Dorset Heathlands Planning Framework 2015-2020 Supplementary Planning Document: An implementation plan to mitigate the impact of new housing development upon the Dorset Heaths Special Protection Area, 2016.

³⁹ See Appendix 1 of Local Plan (Part 2) Sites and Development Management Habitats Regulations Assessment of Submission Document and Main Modifications, NFDC, 2013.

⁴⁰ Solent Disturbance and Mitigation Project (SDMP) Briefing Note, Solent Forum / SDMP Project Group, 2013.

Ramsar site. Only a few small areas of the National Park to the north of Ringwood and to the west of Bisterne fall within this distance of the Avon Valley SPA and Ramsar site. No development allocations are made to these areas and they are not identified by the spatial strategy as a focus for growth. Therefore it is judged that the Local Plan will not result in likely significant effects from recreation pressure on Avon Valley SPA and Ramsar site, either alone or in-combination.

Dorset Heaths SAC and SPA

- 4.75 In line with the methodology described above it is assumed that, prior to mitigation, likely significant effects in combination cannot be ruled out for any residential or visitor accommodation development within 5.0 km of Dorset Heaths SAC or SPA. Only a narrow band along the western edge of the National Park falls within this distance of the Dorset Heaths SAC or SPA. No development allocations are made to this area and it is not identified by the spatial strategy as a focus for growth therefore it is assumed that the Draft Local Plan will not result in significant recreation pressure on Dorset Heaths SAC or SPA either alone or in combination.

New Forest SAC and SPA

- 4.76 In line with the methodology described above it is assumed that, prior to mitigation, likely significant effects in combination cannot be ruled out for any residential or visitor accommodation development within New Forest National Park. All of the 800 dwellings as well as the visitor accommodation provided for by the Local Plan are therefore assumed to contribute to recreation pressure on New Forest SAC and SPA.

Solent Maritime SAC, Solent and Southampton Water SPA and Ramsar site

- 4.77 In line with the methodology described above it is assumed that, prior to mitigation, likely significant effects in combination cannot be ruled out for any residential or visitor accommodation development within 5.6 km of Solent Maritime SAC, Solent and Southampton Water SPA, and Solent and Southampton Water Ramsar site. The Draft Local Plan allocates the following development sites for residential or visitor accommodation within this zone of influence:
- Policy SP22 - Land at Whartons Lane, Ashurst (60 dwellings);
 - Policy SP24 - Land south of Church Lane, Sway (40 dwellings);
 - Policy SP25 - Land adjacent to the former Fawley Power Station (120 dwellings);
 - Policy SP26 - Land at Calshot Village (30 dwellings).
- 4.78 Ashurst, Sway and most of Brockenhurst are within 5.6 km of the Solent designations – all forms of development including housing are directed to these Defined Villages (as well as to Lyndhurst, which is outside the 5.6 km zone) by *Policy SP4: Spatial Strategy*, making it likely that a significant proportion of the 400 windfall dwellings will be developed at these settlements. In addition visitor accommodation is supported at the Defined Villages by *Policy SP46: Tourism Development*. This development is also likely to add to recreation pressure on the Solent and Southampton Water European sites.

Mitigation available

- 4.79 As noted at paragraph 3.21 above, no reliance is placed by the HRA on the generic protection for European sites offered by *Policy SP5: Nature Conservation Sites of International Importance*. However, Policy SP5 also refers to more specific mitigation, noting the opportunity for developers to avoid or fully mitigate any likely significant effects on European sites by putting in place sufficient and effective measures, as well as the opportunity to secure mitigation via contributions to the Authority's Habitat Mitigation Scheme and/or the Solent Recreation Mitigation Partnership's Scheme.
- 4.80 NFNPA's revised Habitat Mitigation Scheme is described in the Authority's Habitat Mitigation Guidance Note⁴¹. The scheme is focussed on alleviating the potential in combination effects of recreation pressure on New Forest SAC, SPA and Ramsar site. The key elements of the revised scheme are access management within the New Forest European designations; alternative

⁴¹ This mitigation scheme was previously set out in the adopted Development Standards SPD but reference here is to the Revised Habitat Mitigation Scheme currently in draft

recreation sites and routes outside the designated sites; education, awareness and promotion; monitoring and research; and in-perpetuity funding. This revised scheme has been developed in discussion with the Authority's Habitat Mitigation Steering Group, which includes representatives from Natural England, HIWWT and the RSPB.

- 4.81 The Authority's Solent Recreation Mitigation Project Explanatory Note⁴² explains that the Solent Scheme is based on evidence that residential development within 5.6 km of the Solent Maritime SAC, Solent and Southampton Water SPA, or Solent and Southampton Water Ramsar site will require mitigation. The Strategy⁴³ proposes:
- a team of 5-7 coastal rangers to advise people on how to avoid bird disturbance, liaise with landowners, host school visits, etc.;
 - communications, marketing and education initiatives and an officer to implement them;
 - initiatives to encourage responsible dog walking and an officer to implement them;
 - preparation of codes of conduct for a variety of coastal activities;
 - site-specific projects to better manage visitors and provide secure habitats for the birds;
 - providing new/enhanced greenspaces as an alternative to visiting the coast;
 - a partnership manager to coordinate and manage all the above.
- 4.82 The supporting text to Policy SP5 also notes that mitigation may not be possible in all cases and that applicants are not precluded from assessing the potential impact of their proposal on the designated sites and devising their own appropriate mitigation measures rather than contributing to the Authority's Habitat Mitigation Scheme and/or the Solent Recreation Mitigation Partnership's Scheme.
- 4.83 *Policy SP9: Green Infrastructure* supports creation and enhancement of green infrastructure, particularly where it increases habitat connectivity or relieves recreational pressure on internationally important nature conservation sites. It also rules out provision of a new Suitable Alternative Natural Green space (SANG) within the National Park to mitigate development outside the National Park, other than in exceptional circumstances. It also commits NFNPA to working with adjoining authorities and other partners to develop green infrastructure.

Conclusions and recommendations

- 4.84 Prior to consideration of mitigation, likely significant in combination recreation pressure effects from the Local Plan cannot be ruled out on New Forest SAC; New Forest SPA; Solent Maritime SAC; Solent and Southampton Water SPA; and Solent and Southampton Water Ramsar site.
- 4.85 LUC believes that it is not a realistic prospect to create new accessible natural greenspace of a scale and character that would effectively deflect all potential additional visits from the residents of new housing development away from the New Forest or Solent coast European designations, as new greenspace could not recreate the vast open character and visitor experience of the New Forest or an alternative coastal experience which draws people from such a large area. We therefore support use of the more diverse packages of measures set out in NFNPA's revised Habitat Mitigation Scheme and in the Solent Recreation Mitigation Partnership's scheme and believe that these are capable of providing effective mitigation of the recreation pressure that might otherwise occur as a result of the development proposed in the Local Plan in combination with that provided in New Forest District and other neighbouring authorities.
- 4.86 In light of the above, it is concluded that reliance can be placed on the NFNPA and Solent schemes to adequately mitigate potential recreation pressure from development within the New Forest National Park and that **likely significant effects due to recreation pressure can be ruled out either alone or in combination.**

⁴² Solent Recreation Mitigation Partnership - Mitigating impacts on designated nature conservation sites in the Solent, Explanatory Note, May 2015, New Forest National Park Authority

⁴³ Solent Recreation Mitigation Strategy, Solent Recreation Mitigation Partnership, December 2017.

Changes in water quantity

- 4.87 This HRA topic considers the potential likely significant effects of the Local Plan in terms of water abstraction to supply new development resulting in harmful changes to water levels or flows at European sites.

HRA Screening assumptions

- 4.88 The HRA assumed that it would not be possible to rule out likely significant effects unless the proposed level of development would not affect the water levels and flows at European sites that are vulnerable to changes in water levels and flows. These sites may be located outside of the Plan area and the 10 km buffer used in the HRA Scoping Report to establish the study area. In this regard, it was noted that Southern Water supplies the eastern half of the New Forest which falls within their 'Hampshire South' Water Resources Zone, much of the water supply for which comes from the River Itchen SAC and this European site was therefore added to the list of European sites scoped into the HRA, as noted in Chapter 3. Based on the New Forest Catchment Abstraction Management Strategy (CAMS)⁴⁴, other European site that could potentially be affected by abstractions within the New Forest include New Forest SAC, SPA and Ramsar sites; Solent Maritime SAC; and Solent and Southampton Water SPA and Ramsar site. It was assumed that the very large, marine extent of Solent and Dorset Coast pSPA means that it is not sensitive to changes in changes in water flows these rivers.

Potential for likely significant effects from Local Plan prior to mitigation

Regulation of water abstraction by the Environment Agency

- 4.89 In 2013 the Environment Agency⁴⁵ looked at the current and future water usage against climate change scenarios to provide an indicative assessment of water stress situation for each water company. Southern Water is identified as being in both current and future water stress. The South Hampshire area of Southern Water takes approximately two-thirds of its water from the River Test (drains to Solent and Southampton Water European sites) and the River Itchen (designated as a SAC and drains to Solent and Southampton Water European sites). Southern Water's Water Resource Management Plan 2015-2040 sets out a number of initiatives to reduce water usage and improve efficiency in supply.
- 4.90 The Environment Agency is responsible for regulating the use of water resources in England and uses the Catchment Abstraction Management Strategy (CAMS) process and abstraction licensing to do this. Where abstractions cause or potentially cause actual flows to fall short of Environmental Flow Indicators (EFIs) and result in environmental damage, the Environment Agency may change or even revoke existing abstractions to achieve a sustainable abstraction regime. The CAMS covering the New Forest⁴⁶ reports there is one water body in which recent actual flows have fallen below the EFI and two waterbodies where fully licensed flows might fall below the EFI. The abstraction licences within these water bodies that cause these environmental issues have been identified by the CAMS and are being investigated as part of the Environment Agency's Restoring Sustainable Abstraction (RSA) programme to better understand the impacts caused by these licences, individually or cumulatively, and to develop mitigation options with licence holders.
- 4.91 Under the Habitats Regulations, the Environment Agency also assesses the effects of existing abstraction licences and applications for new abstractions to make sure they are not impacting on European sites. The New Forest CAMS reports that a review of consents in the New Forest was undertaken in 2005 and concluded that no licences were having an adverse effect on the riverine and wetland (groundwater dependent) New Forest SAC, SPA and Ramsar sites. It also states that Site Action Plans for Solent Maritime SAC and Solent and Southampton Water SPA and Ramsar site were published in 2007, setting out the changes needed to abstraction licences.

⁴⁴ New Forest Abstraction Licensing Strategy, March 2013, Environment Agency

⁴⁵ Water stressed areas – final classification, 2013, Environment Agency

⁴⁶ New Forest Abstraction Licensing Strategy, March 2013, Environment Agency

Water resources management by the water companies

- 4.92 Water companies have a statutory duty to service planned development in their area; the eastern part of the New Forest lies within Southern Water's supply area whilst the western part lies within Sembcorp Bournemouth Water's (SBW) supply area. Water Resources Management Plans (WRMP)⁴⁷ set out how the water company intends to secure its water supply over a 25 year plan period to ensure that a balance between supply availability and forecast water demand is maintained and these WRMPs are subject to HRA. Investments to deliver the plans are based on five year planning cycles known as Asset Management Periods (AMP) so the water company programme for water infrastructure upgrades may constrain the rate at which residential growth can be supported.
- 4.93 HRA Screening of the Southern Water WRMP 2015-2040 concluded that likely significant effects could not be ruled out due to potential effects of the Candover groundwater scheme for river augmentation on the River Itchen SAC, and of the Ford Waste Water Treatment Works (WwTW) effluent transfer scheme on the Arun Valley SAC, SPA and Ramsar site. In light of legally enforceable abstraction licence conditions, a monitoring programme, and other considerations, Appropriate Assessment of the Candover scheme was able to rule out adverse effects on the integrity of the River Itchen SAC. Appropriate Assessment of the Ford WwTW effluent transfer scheme allayed water quality concerns with the water treatment process as well as potential adverse effects on flows.⁴⁸
- 4.94 SBW's WRMP 2014-2039 states that as there is currently a surplus of supply versus demand within the SBW supply area, the SBW WRMP does not contain any proposals for the development of new water resource options. It further states that the potential effects of existing water abstraction operations on European sites have been assessed through the National Environment Programme (NEP) developed by the Environment Agency. The NEP assessment concluded that no sustainability reductions were necessary, i.e. reductions in permitted abstraction from surface or groundwater sources where abstraction has been found to be adversely affecting European sites, Sites of Special Scientific Interest (SSSIs), or sites identified under the Water Framework Directive (WFD). The WRMP states that it was screened for potentially significant environmental effects under the Strategic Environmental Assessment (SEA) Regulations and that it was agreed, in consultation with Natural England, the Environment Agency, and English Heritage, that the WRMP was not likely to have a significant effect on the environment. In light of the results of this SEA Screening and the fact that no new abstractions were proposed and no effects were identified from existing abstractions, adverse effects on European sites from the SBW WRMP will not arise.⁴⁹
- 4.95 It is noted that the WRMPs above were completed prior to the increase in housing provision now being contemplated by NFNPA and that housing provision targets in other local authority areas within the supply network of Southern Water and Bournemouth Water may also have changed since those WRMPs were prepared. Comfort can, however, be taken from the following:
- Both WRMPs are based on Office for National Statistics (ONS) population projections rather than local authority housing provision targets, the SBW WRMP stating that these have performed well in predicting population growth at local area level.
 - Both WRMPs were subject to sensitivity testing, including of population and household projections. For example, sensitivity testing of the SBW WRMP showed that water demand remained below water available for use in a dry year under all tested scenarios, including a 10% increase in the annual growth rate of households and population.
 - An update to the SBW WRMP⁵⁰ did not identify the need to change any of its forecasts.

⁴⁷ WRMPs are statutory plans that set out how the water company intends to secure its water supply over a 25 year plan period to ensure that a balance between supply availability and forecast water demand is maintained.

⁴⁸ Water Resources Management Plan 2015-40 Habitats Regulations Assessment (Summary), 2014, Cascade Consulting for Southern Water

⁴⁹ Water Resources Management Plan 2014: Para 2.5 and Appendix 6 SEA Position Paper, 2014, Atkins for Sembcorp Bournemouth Water

⁵⁰ Water Resources Management Plan annual review and annual data return, Bournemouth Water, June 2016

Mitigation available

- 4.96 *Policy DP8: Safeguarding and Improving Water Resources* requires that development avoids harm to the quality and yield of water resources and requires all residential development within the part of the National Park supplied by Southern Water to be designed to achieve the Government's Optional Technical Standard for water efficiency (110 litres per person per day).
- 4.97 Water companies are subject to the Environment Agency's licensing regime which regulates the amount of water that can be abstracted in order to protect the environment via the CAMS process and associated review of existing abstraction licences and granting of new ones. The ongoing operation of these controls, as described above, helps to ensure that water abstractions do not have a detrimental impact on European sites.

Conclusions and recommendations

- 4.98 In light of the information above, **likely significant effects from changes in water quantity** due to the development proposed by the Local Plan alone or in combination **can be ruled out**.

Changes in water quality

- 4.99 This HRA topic considers the potential likely significant effects of the Local Plan in terms of development leading to:
- increased volumes of treated wastewater discharges, resulting in nutrient enrichment of water and potential lowering of dissolved oxygen as well as increased water velocities and levels downstream of outfalls of WWTW or off-sewage-network private septic tanks and small 'packaged' sewage treatment systems;
 - overloading of combined sewer networks during storm events, resulting in overflows and contamination of water bodies;
 - contaminated surface runoff from urban surfaces and roads.

HRA Screening assumptions

- 4.100 Effects relating to changes in water quality only need to be considered in relation to the European sites that are potentially vulnerable to a reduction in water quality. Based on their designated features and the pressures and threats facing them (see Appendix 1), these were judged to be:
- River Avon SAC;
 - Avon Valley SPA;
 - Avon Valley Ramsar site;
 - Dorset Heaths SAC;
 - Dorset Heathlands Ramsar site;
 - The New Forest SAC;
 - The New Forest Ramsar site;
 - Solent and Dorset Coast pSPA;
 - Solent and Isle of Wight Lagoons SAC;
 - Solent Maritime SAC;
 - Solent and Southampton Water SPA;
 - Solent and Southampton Water Ramsar site.
- 4.101 Key information sources for the following assessments included representations received by NFNPA from the water companies and Environment Agency during consultation on earlier stages

of the Local Plan, a guidance note⁵¹ on managing wastewater discharges to the Solent, and a Nutrient Management Plan⁵² for the River Avon SAC.

Treated wastewater discharges from wastewater treatment works (WwTWs)

- 4.102 The HRA Screening assumed that it was not possible to rule out likely significant effects unless there is sufficient evidence to conclude whether the development proposed is likely to affect water quality at hydrologically connected European sites due to increased volumes of treated wastewater discharged from WwTWs serving the Plan area.

Sewer overflows

- 4.103 The HRA Screening assumed that it is not possible to rule out likely significant effect unless there is sufficient evidence to conclude that any sewer network capacity issues can feasibly be addressed.

Discharges from private septic tanks or small sewage treatment plants

- 4.104 Research commissioned by Natural England⁵³ has shown that phosphorus originating from septic tank discharges can move laterally through the soil profile for a distance of 20-30 m in a variety of soil types. It therefore concluded that the Building Regulations' legislative value of 10 m for the separation of a septic tank soakaway from a watercourse is probably insufficient to protect that waterbody from phosphorus pollution from this source, even where the local hydrology does not provide a shortcut for the delivery of septic tank discharges to water.
- 4.105 The HRA Screening therefore assumed that, prior to mitigation, likely significant effects on water quality cannot be ruled out where development is not likely to be connected to a public sewer and is within 30 m of a European site or a watercourse draining to a European site.

Contaminated surface runoff

- 4.106 The HRA Screening assumed that it is not possible to rule out likely significant effects unless there is sufficient evidence to conclude whether the development proposed is likely to result in an increase in contaminated surface water runoff in proximity to vulnerable European sites. In the absence of guidance and for consistency with the treatment of septic tank soakaways (above), a zone of influence of 30 m from a European site or a watercourse draining to a European site was used.

Potential for likely significant effects from Local Plan prior to mitigation

Evidence from NFNPA consultation with Southern Water and the Environment Agency

- 4.107 The Environment Agency and Southern Water made representations during the October 2016 consultation on the Draft Local Plan and June 2017 consultation on alternative housing sites as follows.
- 4.108 The Environment Agency⁵⁴ referred NFNPA to Southern Water as the sewerage undertaker to ensure that foul water arising from the proposed developments could be accommodated; Southern Water⁵⁵ did not raise any issues in relation to the capacity of its WwTWs to accommodate the development proposed in the National Park.
- 4.109 The Environment Agency also suggested that NFNPA determines whether there are any opportunities in the Sway and Lyndhurst drainage catchments to reduce diffuse pollution, thereby increasing the headroom of WwTWs in these catchments to discharge to water bodies which, under the Water Framework Directive, are currently failing to meet Good status in relation to nutrient levels. *Policy SP4: Spatial Strategy* directs development to both Sway and Lyndhurst as Defined Villages and allocations are made to these settlements (*Policy SP23: Land at the former*

⁵¹ Addressing the needs of housing growth and protecting the Marine Environment in the Solent area, Environment Agency and Natural England, October 2015

⁵² River Avon Special Area of Conservation Nutrient Management Plan for Phosphorus, Natural England, the Environment Agency and Wiltshire Council, 2015

⁵³ May, L., Withers, P.J., Stratford, C., Bowes, M., Robinson, D. & Gozzard, E. 2015. Development of a risk assessment tool to assess the significance of septic tanks around freshwater SSSIs: Phase 1 – Understanding better the retention of phosphorus in the drainage field. Natural England Commissioned Reports, NECR171.

⁵⁴ Letter to NFNPA re. 'New Forest National Park Local Plan Review – Consultation Draft, Environment Agency, November 2016

⁵⁵ October 2016 Draft Local Plan consultation response form

Lyndhurst Park Hotel, Lyndhurst; Policy SP24: Land south of Church Lane, Sway). Such development would be likely to add to the volume of discharges from the WwTWs serving these settlements and hence to nutrient levels in the receiving waters.

- 4.110 Sway is assumed to be served by the WwTW on Flexford Lane, for which the receiving water appears to be a stream called Avon Water that drains to the Solent at Keyhaven. Lyndhurst is assumed to be served by the WwTW at Dunces Arch Inclosure off the A35 Southampton Road. The receiving water appears to be a headwater stream of the Beaulieu River that drains to the Solent to the west of Lepe. Both waters drain to parts of the Solent forming part of Solent Maritime SAC, Solent and Southampton Water SPA and Ramsar site, and Solent and Dorset Coast pSPA. The designated features of these European designations are sensitive to water quality effects. While not mentioned in the consultation responses, it appears that development in the other two Defined Villages identified by *Policy SP4: Spatial Strategy*, Ashurst and Brockenhurst, would also be likely to be served by WwTWs that are hydrologically connected to these same Solent European sites.
- 4.111 Southern Water's representations on the Draft Local Plan⁵⁶ in relation to development sites still being allocated in the Regulation 19 Submission draft of the Local Plan identified limited capacity in those parts of the sewerage network in closest proximity to the development allocations at Wharton's Lane, Ashurst and South of Church Lane, Sway. The representation notes that Southern Water has limited powers to prevent new connections to the sewerage network, even when capacity is insufficient, and therefore recommends inclusion in the Local Plan allocation policies a requirement for development proposals to '*provide a connection to the nearest point of adequate capacity in the sewerage network, as advised by the service provider*'. The representation also requests generic support in the policy on Infrastructure Provision and Developer Contributions for new and improved utility infrastructure to meet identified community needs. No WwTW capacity issues were raised in Southern Water's representations on alternative housing sites⁵⁷.

Evidence on water quality issues in Southampton Water and the Solent European sites

- 4.112 Natural England and the Environment Agency have produced a guidance note⁵⁸ on the challenges in the Solent area in managing nutrients and sewage discharges to the marine environment whilst meeting the need for growth. This states that:
- elevated nitrogen levels are contributing to the growth of opportunistic green seaweed mats in many parts of the Solent area and that these mats smother estuarine habitats and restrict the growth, distribution and variety of food available for wetland birds;
 - although much of this nitrogen is from agriculture, a smaller but still substantial proportion is from wastewater discharges;
 - there is currently little certainty that future development of the scale proposed in the Partnership for Urban South Hampshire (PUSH) area can ensure no adverse effect on the integrity of the Solent's European designations without mitigation;
 - while various actions to reduce nutrient inputs to the Solent have already been taken, further reductions are required from both agricultural and development growth sources and Natural England and the Environment Agency are keen to work with the PUSH authorities and water companies to develop a strategic solution.
- 4.113 While no water cycle study is available for New Forest National Park, the Partnership for Urban South Hampshire (PUSH) has commissioned an Integrated Water Management Strategy (IWMS)⁵⁹ to investigate whether the combined housing growth planned in the PUSH area (covers a large area immediately to the east of New Forest National Park and also drains to the Solent and Southampton Water) can be accommodated whilst protecting the water environment. The overall conclusion of the IWMS in relation to potential effects of growth on European sites and SSSIs is that:

⁵⁶ October 2016 Draft Local Plan consultation response form

⁵⁷ June-July 2017 Local Plan Potential Alternative Housing Site Allocations consultation response form

⁵⁸ Addressing the needs of housing growth and protecting the Marine Environment in the Solent area, Environment Agency and Natural England, October 2015

⁵⁹ Integrated Water Management Study: Final Report, Amec Foster Wheeler for PUSH, August 2017

"there are not many water quality issues for nitrate from WwTW and that in total nitrate loading from WwTWs only account for 3-18% of the loading to designated areas. As such, impacts from individual works may not be significant. However, Natural England have stated that the conditions of some of the areas are unfavourable due to current nitrate loading from continuous and intermittent discharges from WwTWs and sewer networks and that any future housing growth could exacerbate water quality issues and ecological impacts. This discrepancy in understanding of the baseline indicates that further study maybe required on nitrate impacts on designated areas on the South coast."

4.114 Specific conclusions of the IWMS for the European sites relevant to this HRA are as follows:

- Solent Maritime SAC: *"Information provided by the EA and Natural England indicates that there is evidence of eutrophication within parts of the SAC."*
- Solent and Southampton Water SPA: *"Information provided by the EA indicates that there is a eutrophication problem in the area and that measures are required now to reduce nitrate input."*

4.115 There is currently a divergence between the views of Natural England and the conclusions of the IWMS on the significance of housing growth in the PUSH area for nutrient enrichment of the Solent. Nevertheless, the IWMS concludes with a phased action plan of recommended improvements in the PUSH area to support planned housing growth to 2036. These comprise upgrades to WwTWs and sewer networks as well as catchment solutions in the form of targeted agri-environment schemes to reduce nitrate levels and protect water quality in the WFD catchments within the PUSH area, including Southampton Water and the Solent.

4.116 Representations on the Draft Local Plan and Alternative Housing Allocations do not explicitly address the issue of nutrient enrichment of the Solent and Southampton Water European sites from WwTW discharges despite this having been identified as an issue by a Natural England and the Environment Agency guidance note⁶⁰.

4.117 While the relatively small scale of development proposed by the NFNPA Local Plan is judged unlikely, on its own, to result in significant adverse water quality effects on the Solent European, the information above indicates a potential for likely significant effects in combination with development in the PUSH area whose WwTWs are also hydrologically connected to the Solent and Southampton Water.

Evidence of potential water quality effects on the River Avon/Avon Valley European sites

4.118 As noted in Appendix 1, River Avon SAC and Avon Valley SPA and Ramsar site are known to be sensitive to and already suffering from elevated phosphorus levels. This is confirmed by information on the Hampshire Avon catchment within the South West river basin management plan⁶¹ which cites poor water quality, particularly diffuse sources of phosphorus, nitrate and sediment from rural areas. A Nutrient Management Plan⁶² (NMP) has been published to facilitate reduction and management of phosphorus levels in the River Avon SAC. This is to comply with Habitats Directive obligations since phosphorus is identified as posing the most significant threat to the site's qualifying features. The effects of nitrogen and other pollutants are addressed in a separate plan for the Avon catchment but this is not considered further since it relates to diffuse sources (primarily agriculture) rather than WwTW discharges that are linked to housing growth.

4.119 Parallel HRA work by LUC on the New Forest District Local Plan Part 1 has identified the potential for likely significant water quality effects, in combination, on the European designations of the River Avon, giving rise to the need for additional assessment, which is ongoing. This work for New Forest District has identified that one or more of the STWs draining to the River Avon appear to have a catchment which also serves the National Park, for example Burley is served by Ringwood STW. However, *Policy SP4: Spatial Strategy* of NFNPA's Local Plan does not focus growth in the western parts of the National Park that drain to the River Avon and none of the site allocations are in this area. Based on the spatial distribution of planned growth and the relatively

⁶⁰ Addressing the needs of housing growth and protecting the Marine Environment in the Solent area, Environment Agency and Natural England, October 2015

⁶¹ Part 1: South West river basin district river basin management plan, Environment Agency & Defra, Dec 2015.

⁶² River Avon Special Area of Conservation Nutrient Management Plan for Phosphorus, Natural England, the Environment Agency and Wiltshire Council, 2015

small scale of growth proposed by the Local Plan as a whole, likely significant water quality effects in relation to WwTW discharges to the River Avon European designations are ruled out from the NFNPA Local Plan alone or in combination.

Discharges from private septic tanks or small sewage treatment plants or contaminated surface water runoff

- 4.120 In line with the screening methodology described above, the Local Plan site allocations were reviewed to determine whether any of them was within 30 m of a European site or a watercourse draining to a European site, as set out in Table 4.2.

Table 4.2 Proximity of site allocations to European sites or watercourses connected to these

Allocation policy	Within 30 m of European site?	Within 30 m of watercourse draining to European site?
Policy SP22: Land at Whartons Lane, Ashurst	No	No
Policy SP23: Land at the former Lyndhurst Park Hotel, Lyndhurst	Yes – directly adjacent to New Forest SAC, SPA and Ramsar site	No
Policy SP24: Land south of Church Lane, Sway	No	No
Policy SP25: Land adjacent to the former Fawley Power Station	Yes - directly adjacent to Solent Maritime SAC, Solent and Dorset Coast pSPA, Solent and Southampton Water SPA and Ramsar site	No
Policy SP26: Land at Calshot Village	No	No
Policy SP33: Gypsies, Travellers and Travelling Showpeople	Yes – directly adjacent to The New Forest SAC	No

- 4.121 Prior to consideration of mitigation, this indicates a potential for allocations made by Policies SP23, SP25, and SP33 to have water quality effects in the form of discharges from private septic tanks or small sewage treatment plants or contaminated surface water runoff. Such effects could also arise in relation to the unallocated residential development provided for by *Policy SP19: New residential development in the National Park* (400 windfall dwellings; rural exception sites; housing for New Forest Commoners; housing for estate workers; tied agricultural dwellings) and by *Policy SP20: Specialist Housing for Older People*.

Mitigation available

- 4.122 *Policy DP8: Safeguarding and Improving Water Resources* states that development will not be permitted if it would risk harm to the quality of water resources, including abstraction sites, groundwater, rivers, streams and still waters. Following recommendations made by the Draft HRA Report, additional safeguards were added to this policy requiring development to either implement appropriate Sustainable Drainage Systems (SuDS) or demonstrate that surface water run-off from the development will not adversely affect any European nature conservation sites. In addition, a commitment was added in the supporting text to Policy DP8 to support the Environment Agency, Southern Water and Natural England in the development of any strategic solution to reducing nutrient inputs to the Solent from wastewater discharges.
- 4.123 In line with the recommendations made by Southern Water during consultation on the draft Local Plan, *Policy SP22: Land at Whartons Lane, Ashurst* and *Policy SP24: Land south of Church Lane,*

Sway both require that development proposals provide a connection to the nearest point of adequate capacity in the sewerage network.

- 4.124 *Policy SP38: Infrastructure Provision and Developer Contributions* requires development proposals to make provision for the infrastructure necessary to ensure that the development is acceptable in planning terms. NFNPA has also incorporated the support for utility infrastructure requested by Southern Water in its comments on the Draft Local Plan.
- 4.125 The volume and quality of treated wastewater discharges from WwTWs to receiving water courses is subject to regulation by the Environment Agency via the grant and review of environmental permits. This Environmental permitting regime operated by the Environment Agency should ensure that any development requiring variation in the discharge consent for a WRC does not result in deterioration in downstream water quality as a result of that variation.
- 4.126 Any new discharge to the ground from a septic tank or small sewage treatment plant within 50 m of a European site requires a permit from the Environment Agency.⁶³ Granting of such a permit would take into account the requirements of the Habitats Regulations.

Conclusions and recommendations

Treated wastewater discharges from wastewater treatment works (WwTWs)

- 4.127 While the study area for the PUSH IWMS⁶⁴ does not extend to New Forest National Park (and NFNPA has not carried out its own water cycle study), it provides relevant information on in combination water quality issues in the Solent and Southampton Water. This study, together with the Natural England and the Environment Agency guidance note⁶⁵, indicates that there is a eutrophication problem in the European sites of the Solent and Southampton Water to which WwTW discharges contribute. There is a potential for the housing growth proposed by the Local Plan to have significant effects in combination with that proposed by New Forest District Council and the other PUSH authorities on Solent and Isle of Wight Lagoons SAC, Solent Maritime SAC, Solent and Dorset Coast pSPA, Solent and Southampton Water SPA, and Solent and Southampton Water Ramsar site.
- 4.128 In recognition of the potential for the NFNPA Local Plan to contribute to these effects, the Local Plan includes a commitment to support the Environment Agency, Southern Water and Natural England in the development of any strategic solution to reducing nutrient inputs to the Solent from wastewater discharges. In light of the fact that the majority of the nitrogen inputs to the Southampton Water and Solent European sites are from agriculture rather than WwTW discharges and that the scale of growth proposed in New Forest National Park over the 20 year Local Plan period is very small (40 dwellings per annum) relative to the total growth planned in the PUSH area (approximately 20,000 dwellings per annum⁶⁶), it is judged that this commitment provides sufficient certainty that the contribution of NFNPA's Local Plan to nutrient enrichment of the Southampton Water and Solent European sites will be negligible and that **likely significant effects from treated wastewater discharges associated with the growth proposed by the Local Plan can be ruled out.**

Sewer overflows

- 4.129 As described above, NFNPA's consultation with Southern Water identified capacity issues in the closest part of the sewerage network to development allocations at Wharton's Lane, Ashurst and South of Church Lane, Sway. In response to this, NFNPA has amended the corresponding Local Plan allocation policies (SP22, SP24) to require that development proposals provide a connection to the nearest point of adequate capacity in the sewerage network and has also added generic support for the provision of utility infrastructure to Policy SP38. The potential risk of sewer overflows from connection of other development provided for by the Local Plan to the sewerage network, including 400 windfall dwellings, is judged to be adequately mitigated by the requirement in Policy SP38 for development proposals to make provision for the infrastructure

⁶³ Environment Agency. (2015) *General binding rules: small sewage discharge to the ground*. [Online] Available from: <https://www.gov.uk/guidance/general-binding-rules-small-sewage-discharge-to-the-ground>

⁶⁴ Integrated Water Management Study: Final Report, Amec Foster Wheeler for PUSH, August 2017

⁶⁵ Addressing the needs of housing growth and protecting the Marine Environment in the Solent area, Environment Agency and Natural England, October 2015

⁶⁶ Appendix A of Integrated Water Management Study: Final Report, Amec Foster Wheeler for PUSH, August 2017

necessary to ensure that the development is acceptable in planning terms. It is therefore concluded that **likely significant effects on water quality from sewer overflows either alone or in-combination can be ruled out.**

Discharges from private septic tanks or small sewage treatment plants

- 4.130 As described above, generic protection for water quality is provided by Policy DP8 and a generic requirement for developers to provide necessary infrastructure is provided by Policy DP38. It is judged that these policies adequately mitigate the risk to water quality from unallocated development provided for by the Local Plan as a result of potential discharges from private septic tanks or small sewage treatment plants.
- 4.131 It is judged that the specific risk identified from the allocations within 30 m of European sites (Policies SP23, SP25 and SP33) requires more specific mitigation but that this is provided by the fact that any new discharge to the ground from a septic tank or small sewage treatment plant within 50 m of a European site requires a permit from the Environment Agency.⁶⁷
- 4.132 **Likely significant water quality effects in relation to discharges from private septic tanks or small sewage treatment plants can therefore be ruled out**, either alone or in combination.

Contaminated surface water runoff

- 4.133 As described above, generic protection for water quality is provided by Policy DP8 and a generic requirement for developers to provide necessary infrastructure is provided by Policy DP38. It was judged that these policies adequately mitigate the risk to water quality from unallocated development provided for by the Local Plan as a result of contaminated surface water runoff.
- 4.134 However, it was judged that the specific risks identified from the allocations within 30 m of European sites (Policies SP23, SP25 and SP33) required more specific mitigation. This resulted in additional safeguards being added to Policy DP8, as described above.
- 4.135 **Likely significant water quality effects in relation to contaminated surface water runoff can therefore be ruled out**, either alone or in combination.

⁶⁷ Environment Agency. (2015) *General binding rules: small sewage discharge to the ground*. [Online] Available from: <https://www.gov.uk/guidance/general-binding-rules-small-sewage-discharge-to-the-ground>

5 Appropriate Assessment

- 5.1 As described in the HRA Screening in Chapter 4, a need for Appropriate Assessment was identified in relation to the following two types of likely significant effect:
- loss or damage to offsite supporting habitat;
 - traffic collision risk.
- 5.2 This chapter considers each of these types of likely significant effects in turn and concludes whether adverse effects on the integrity of European sites can be ruled out.

Loss or damage to offsite supporting habitat for qualifying bird populations

Background

- 5.3 The Local Plan allocates a number of development sites in areas where certain qualifying SPA and Ramsar bird species may make use of offsite habitat for foraging, roosting and loafing. The screening stage was unable to rule out the potential for likely significant effects on the Avon Valley SPA and Ramsar site, Dorset Heathlands SPA, New Forest SPA, and Solent and Southampton Water SPA and Ramsar site, as a result of the loss of offsite habitat. As a result, Appropriate Assessment was undertaken, as detailed below, to determine whether the loss of offsite habitat would result in adverse effects on the integrity of any of these European sites.

Approach

- 5.4 In response to comments provided by Natural England and HIWWT during the consultation process, the Appropriate Assessment commenced with a detailed desk-based study to identify potential impacts from proposed site allocations on offsite habitat used by the qualifying bird species of the European sites. For each of the proposed development allocations, sites were reviewed using aerial imagery to determine their potential suitability for supporting SPA species. This included identifying broad habitat types present, current land usage, shape and size of site, degree of openness, and information regarding the context of the site within the wider landscape, including in terms of habitat connectivity and proximity to habitats of known importance for SPA birds. This review also considered the presence of potential adverse factors such as proximity of sources of disturbance and/or habitat features likely to reduce the potential for SPA bird species, such as the effect of prominent edge features in reducing the openness typically preferred by foraging waders and wildfowl.
- 5.5 Hampshire Biodiversity Information Centre (HBIC) Desk Study Reports were then reviewed, if required, to identify whether records of relevant bird species have been recorded within the site, or in close proximity. Where necessary, the habitat types affected were cross-checked against the habitat preferences identified for specific bird species. Where habitats of potential importance for specific bird species are likely to be affected, a more detailed assessment was undertaken which used the following additional information sources to identify whether such habitats are likely to be important for the bird species:
- Brent goose/wader strategy data for the Solent (available from Solent Forum);
 - various Natural England/New Forest Authority Bird Survey reports (e.g. for nightjar);
 - HBIC bird records and GIS files.

Assessment of importance of allocated sites for SPA/Ramsar birds

- 5.6 To determine the potential importance of each site allocation to provide supporting offsite habitat it was necessary to establish which habitat types have the potential to be of importance for each of the bird species for which the SPA and Ramsar sites are designated. Known habitat preferences for each species, as set out in Table 5.1, were taken from *Birds of the Western Palearctic* (British Trust for Ornithology), and further refined in light of local preferences via consultation with Natural England officers and HIWWT.
- 5.7 Bird habitat preferences were then cross referenced against the habitat types present within each allocation (taking into account any of the factors listed above) to determine the suitability of offsite parcels for SPA and Ramsar bird species.
- 5.8 The detailed assessment of habitat suitability for each site allocation is shown in Table A5.1 in Appendix 6 and is summarised below and in Table 5.1:
- **Policy SP22 Land at Whartons Lane, Ashurst** – The site comprises horse grazed pasture and given its relatively small size, distance from European sites, proximity of the urban edge of Ashurst and the presence of negative edge factors, including woodland and tree lines at the site periphery which significantly reduce the openness typically preferred by feeding wader and wildfowl species, the grassland is considered unsuitable for SPA/Ramsar species. Tree lines along the site boundary and woodland adjacent to the site provide suitable habitat for foraging nightjar, but any project level development at the site would be expected to minimise the effect of potential impacts on these receptors, for example as a result of lighting, through standard planning processes, and therefore development at the site allocation would not be expected to affect the suitability of these habitat features for foraging nightjar.
 - **Policy SP23 Land at the Former Lyndhurst Park Hotel, Lyndhurst** – The site is primarily comprised of a former hotel building in the north of the site, together with mature gardens and woodland habitats in the southern part. Despite the presence of woodland, the site is surrounded by the urban area of Lyndhurst and given its small size, and presence of negative factors such as levels of disturbance and lighting, together with its relative isolation within the landscape, it is considered to be of negligible value for foraging SPA species, including those species which are reliant upon woodland habitats.
 - **Policy SP24 Land South of Church Lane, Sway** – The site comprises horse grazed pasture and given the proximity of the urban edge of Sway and the presence of negative edge factors, including woodland and tree lines at the site periphery which significantly reduce the openness of the site, the grassland is considered unsuitable for SPA/Ramsar species. Mature tree lines along the south and west site boundary provide suitable habitat for foraging nightjar, but any project level development at the site would be expected to minimise the effect of potential impacts on these receptors, for example as a result of lighting, through standard planning processes, and therefore allocation of the site for development would not be expected to affect the suitability of these habitat features for foraging nightjar.
 - **Policy SP25 Land Adjacent to the Former Fawley Power Station Site** – A review of aerial imagery indicates that the site comprises tall grasslands and dense scrub. A separate study which was undertaken to inform the impact of development within the site on the Tom Tiddlers Ground SINC⁶⁸ confirms that the site is predominantly comprised of acid grassland, dense scrub and reedbed. Small areas of scrub succeeding to woodland, and degraded saltmarsh habitat are also present. These habitat types are generally considered of low importance for waders, wildfowl, wetland, heathland and woodland species listed above. The rough grasslands and dense scrub habitats provide opportunities for hunting and roosting hen harrier, whilst merlin may also utilise the open rough grassland habitats for hunting. The scrub habitats and reed bed also provides suitable habitat for supporting Dartford warbler during both the breeding and wintering period. Hen harrier and merlin are wide roaming and including large areas of semi-natural habitat within their wintering grounds, and whilst this site allocation may contribute to the total extent of suitable habitat within the region, given the relative size of the site allocation, and the roaming nature of these bird species during winter, the site is unlikely to be important in contributing to the maintenance of wintering

⁶⁸ Tom Tiddlers Ground SINC Impact Assessment

populations of these species. The scrub and reed bed habitats may support breeding Dartford warbler but the site is located over 3.5km from the New Forest SPA and therefore the presence of this species at the site is likely to be additional to the breeding SPA population and alone is unlikely to be important in maintaining the population. On a precautionary basis, mitigation measures which provide the safeguards to ensure that Policy SP25 will not result in adverse effects on the integrity of the Dorset Heathlands SPA/Ramsar and New Forest SPA on account of the effect of loss of offsite habitat on hen harrier, merlin and Dartford warbler, is provided below.

- **SP26 Land at Calshot Village** - The site is primarily comprised of rough grassland, scrub and scattered trees. The site's linear shape, existing levels of use and proximity to existing housing development means that it is unlikely to be utilised by hen harrier, merlin or Dartford warbler. Furthermore, the site is unlikely to be utilised by foraging woodland species such as nightjar due to its distance and relative isolation from the New Forest SPA, being separated by the urban areas of Langley and Blackfield. In summary this site allocation is considered unsuitable for all of the SPA/Ramsar bird species listed above.
- **SP33 Gypsy Site at Forest View, Landford** - The Site comprises a relatively small field of horse grazed pasture, plus hard standing, and an agricultural building. Given the small size of the site and the habitats present it is considered likely to be of negligible importance for SPA/Ramsar birds.

5.9 The assessment of the suitability of offsite habitats located within the site allocations is provided below for each of the SPA/Ramsar species.

Table 5.1 Assessment of offsite habitat suitability by species

Bird species	Season to which qualifying species ⁶⁹ relate	Broad habitat types of potential importance	Potential for reliance on habitats within sites allocated by New Forest Local Plan
Avon Valley SPA			
Bewick's swan	Winter	Arable; grazed pasture	No – key habitat types not present within, or affected by site allocations
Gadwall	Winter	Riparian; open water	No – key habitat types not affected
Avon Valley Ramsar site			
Northern pintail	Winter	Open water; coastal wetlands	No – key habitat types not affected
Black-tailed godwit	Winter	Coastal wetlands; wet grasslands; grazed pasture; arable. Grasslands managed as meadows, especially when grazed and hay-cut and flooded in winter are also favoured. Outside the breeding season, favoured habitats include sewage farms, lake margins, tidal marshes, mudflats and sheltered coastal inlets.	No – Policy SP25 (Land adjacent to the former Fawley Power Station site) supports development of extensive grasslands adjacent to Solent and Southampton Water SPA/Ramsar but the rank nature of the grassland sward, together with the presence of extensive areas of scattered and dense scrub represents habitat conditions of low suitability for this species.
Lesser black-backed gull	Spring/autumn passage	Open water; coastal wetlands; riparian; arable; grazed pasture	No – key habitat types not affected
Little grebe	Winter	Riparian; open water	No – key habitat types not affected
Little egret	Winter	Riparian; open water	No – key habitat types not

⁶⁹ Emails to LUC during August 2016

Bird species	Season to which qualifying species ⁶⁹ relate	Broad habitat types of potential importance	Potential for reliance on habitats within sites allocated by New Forest Local Plan
			affected
Greater white-fronted goose	Winter	Arable; grazed pasture	No – key habitat types not affected
Northern shoveler	Winter	Open water	No– key habitat types not affected
Dorset Heathlands SPA			
Dartford warbler	Summer (breeding)	Heathland, open scrub habitats, occasionally reed bed.	Yes – SP25 supports extensive areas of dense scrub and this species has been recorded breeding and overwintering in the Tom Tiddlers SINC which encompasses the site.
Nightjar	Summer (breeding)	Heathland and open woodlands Foraging habitats additionally include tree lines; hedgerows; grazed pasture; meadows	No – nightjar will forage several km from their heathland nest sites, typically utilising woodland edges, linear habitats and invertebrate rich grasslands. Whilst treelines and mature trees occur within Policies SP22, SP24, SP26 and SP33, the majority of these site allocations comprise habitats of low suitability for foraging nightjar and their position in the landscape is such that the features present would not be expected to be important in maintaining foraging habitat or connectivity.
Woodlark	Summer (breeding)	Heathland; open woodlands; arable (winter)	No – the habitats present within the site allocations are either of low suitability or are sufficiently small in area that they are unlikely to be important for this species for offsite foraging.
Hen harrier	Winter	In winter, often on arable farmland or rough pastures, or on heathland, coastal sand-dunes, and marshy areas. Habitat selection largely governed by availability of preferred prey species which can be seized in the open; otherwise, not discriminating but choosing spacious, relatively undisturbed landscapes rather than areas in intensive human use.	Yes - Wide ranging during winter and typically reliant on coastal, river floodplains and heathland habitats. Extensive areas of rough grassland and scrub within site allocation SP25 have the potential to contribute to the extent of suitable winter foraging and roosting habitat but would not be expected to be important alone in maintaining populations of this species.
Merlin	Winter	Various open habitats including heathland; coastal wetlands; arable; grasslands	Yes - Wide ranging during winter and typically reliant on open habitats. Extensive areas of rough grassland within site allocation SP25 have the potential to contribute to the extent of suitable winter foraging habitat but would not be expected to be important alone in maintaining populations of this species.
Dorset Heathlands Ramsar site			

Bird species	Season to which qualifying species ⁶⁹ relate	Broad habitat types of potential importance	Potential for reliance on habitats within sites allocated by New Forest Local Plan
As per SPA above (Dartford warbler, hen harrier and merlin only)	As above	As per Dorset Heathlands SPA above	No - See above
New Forest SPA			
Dartford warbler, nightjar, woodlark	Summer (breeding)	See Dorset Heathlands SPA above	Yes – Dartford warbler. No - other species. As per Dorset Heathlands SPA above.
Honey buzzard	Summer (breeding)	Woodland and associated heathland	No – key habitat types not affected
Hen harrier	Winter	Heathland; coastal wetlands; reedbed; rough grassland; arable	Yes – see above. As per Dorset Heathlands SPA
Solent and Southampton Water SPA			
Common tern	Summer (breeding)	Open water; riparian; coastal wetland	No – key habitat types not affected
Little tern	Summer (breeding)	Open water; coastal wetland	No – key habitat types not affected
Mediterranean gull	Summer (breeding)	Open water; coastal wetland	No – key habitat types not affected
Roseate tern	Summer (breeding)	Open water; coastal wetland	No – key habitat types not affected
Sandwich tern	Summer (breeding)	Open water; coastal wetland	No – key habitat types not affected
Black-tailed godwit	Winter	See above	No – see above
Dark-bellied brent goose	Winter	On leaving breeding quarters, resorts to shallow sea coasts and estuaries, especially with extensive mudflats rich in sea grass. Strongly attached to intertidal feeding zones, but in Britain since 1970's increasing numbers have moved inland to feed on grass and cultivated crops. When not feeding, prefers to rest or sleep on sea surface.	No – key habitat types not affected
Ringed plover	Winter	A bird of sea coasts. Secondly occupies adjoining hinterlands up to substantial distance inland, where estuaries, rivers, lakes, tundra, gravel beds, sand bars, grasslands of spare and low growth, or other suitable well-drained terrain exists. Whether breeding, migrating or wintering, tends to be most numerous and concentrated on wide sandy or shingle tidal beaches, with access to suitable resting or nesting places above high-water mark.	No – key habitat types not affected

Bird species	Season to which qualifying species ⁶⁹ relate	Broad habitat types of potential importance	Potential for reliance on habitats within sites allocated by New Forest Local Plan
Teal	Winter	On passage or in winter will frequent open habitats such as shallow tidal coasts, large estuaries, salt-marshes, and lagoons, brackish or saline, flooded fields, and artificial waters such as reservoirs devoid of vegetation.	No – key habitat types not affected
Bird assemblage (species listed above plus great crested grebe, cormorant, wigeon, redshank, red breasted merganser, grey plover, lapwing, dunlin, curlew and shelduck)	Winter	<p>As above</p> <p>Lapwing - Requires ready access to soil carrying appreciable biomass of surface or subsurface organisms, not arid and preferably moist or near saturation. Invariably chooses unenclosed terrain affording unbroken all-round views. Throughout historical times, natural habitat has been encroached with suitable substitutes created through farming, with a shift from natural to agricultural land.</p> <p>Grey plover - After breeding, some use of inland staging points, often by lakes on sand bars, mudflats, pools, and moist places, including short grassy fields and floodlands.</p> <p>Curlew - After breeding season, shifts mainly to marine coastal habitat, especially mudflats and sands extensively exposed at low tide, resting on adjoin saltmarshes, foreshores, and floodlands. Rocky beaches with many pools, muddy estuaries and comparable habitats beside large inland waters, including riverside and swamp edges are also favoured. This species is known to regularly utilise coastal grasslands and arable fields within search area.</p> <p>Wigeon - Winter habitat lowland and largely maritime, especially along coasts where shallow, fairly sheltered waters and extensive tracts of mud, sand, or salt marsh offer sustenance and security for gatherings. Freshwater and brackish lagoons and tracts of flooded grassland also attractive, and may be used in preference to coastal waters.</p>	No – key habitat types not affected. Whilst many of the wader species will utilise grassland habitats, those present within Policy SP25 (land adjacent to the former Fawley Power Station site support rough grasslands and scrub habitats considered to be of low suitability for these species.
Solent and Southampton Water Ramsar site (species in addition to SPA of same name)			
Black headed gull	Summer (breeding)	Coastal wetland; open water; riparian; grazed pasture; arable	No – key habitat types not affected
Little egret	Spring/autumn	Riparian; open water	No – key habitat types not affected
Spotted redshank	Spring/autumn	Coastal wetland	No – key habitat types not affected
Greenshank	Spring/autumn	On leaving breeding grounds, continental birds, especially, pause at inland flooded meadows, dried up lakes, sandy bars, and marshes on the way to winter resorts. These are varied including seashores which are not too rocky or dominated by cliffs, salt	No – key habitat types not affected

Bird species	Season to which qualifying species ⁶⁹ relate	Broad habitat types of potential importance	Potential for reliance on habitats within sites allocated by New Forest Local Plan
		marshes, pools on tidal reefs, estuaries and muddy or sandy tidal inlets, lagoons, inland rivers, lakes, reservoirs, pools, ponds, sewage farms, sand banks, and mudspits.	
Slavonian grebe	Winter	Coastal wetland; open water	No – key habitat types not affected
Black necked grebe	Winter	Coastal wetland; open water	No – key habitat types not affected
Cormorant	Winter	Coastal wetland; open water; riparian	No – key habitat types not affected
Water rail	Winter	Wetland; riparian; reedbed (densely vegetated)	No – key habitat types not affected

Summary and mitigation requirements

5.10 In summary, the assessment concluded that none of the strategic site allocations supported habitats which would be likely to be important in maintaining populations of SPA/Ramsar birds for the reasons outlined above and in Table A5.1 in Appendix 6. However, in order to provide the necessary level of certainty that the loss of habitat associated with 'SP25 Land Adjacent to the Former Fawley Power Station Site' will not result in adverse effects on the integrity of the Dorset Heathlands SPA/Ramsar and New Forest SPA on account of the effect of loss of offsite habitat for hen harrier, merlin and Dartford warbler, the **following mitigation was recommended** for inclusion within the Local Plan:

- **Site allocation Policy SP25: Land Adjacent to the Former Fawley Power Station Site should include a requirement to undertake site-specific bird surveys to confirm the status of SPA/Ramsar species at the site, particularly merlin, hen harrier and Dartford warbler, to inform appropriate mitigation requirements as part of site specific development and masterplanning.**

5.11 This recommendation has been accepted by NFNPA and the mitigation included within the allocation Policy SP25.

5.12 It is considered acceptable to defer this further HRA work to the project/development management stage because, as specified in Table A5.1 in Appendix 6, site SP25 is considered unlikely on its own to be of importance in maintaining SPA/Ramsar bird populations, and the proposals for ecological restoration and enhancement within the wider landscape⁷⁰ provide sufficient confidence that any impact identified would be expected to be capable of being mitigated for on-site or in the vicinity, if required.

5.13 The following provides an example of guidance to proposers of development that could be incorporated in supporting text to the allocation policy:

'Project level development for Land Adjacent to the Former Fawley Power Station Site will be required to provide an assessment of impacts on SPA/Ramsar bird species, particularly hen harrier, merlin, and Dartford warbler. This assessment should incorporate a suitable level of data collection and/or bird surveying to determine the individual and cumulative importance of the site for SPA/Ramsar species. Where the assessment identifies the potential for adverse effects on integrity resulting from the offsite habitat loss, appropriate and timely measures must be taken to mitigate such impacts. Such mitigation is likely to be in the form of on-site habitat, managed specifically for the affected bird species and/or contributions towards the provision of strategic mitigation sites in the vicinity. All such measures must be in place and operational prior to the relevant impact(s), and must be maintained for the duration of the impact(s).'

⁷⁰ Fawley and Calshot Nature Conservation Management Plan; Draft, Version 5ii (Oct 2017)

Conclusion of Appropriate Assessment of loss of offsite habitat

- 5.14 The detailed desk study and review of site information presented above indicated that with the exception of Policy SP25, the sites are of negligible importance for SPA/Ramsar species. Site SP25 Land Adjacent to the Former Fawley Power Station Site, provides suitable habitat for merlin hen harrier and Dartford warbler, but given the behaviour of these species, the limited extent of suitable habitat, and the numbers of birds the site is likely to be capable of supporting, it is considered unlikely to be important in contributing to the maintenance of SPA/Ramsar populations for these species. Therefore, the mitigation measures provided above were recommended on a precautionary basis to provide the necessary level of certainty that the habitat loss associated with SP25 would not result, cumulatively or in-combination, in adverse effects on the integrity of European Sites.
- 5.15 In light of the desk study findings presented above and the fact that the recommended mitigation has now been incorporated in Policy SP25, **adverse effects on the integrity of European sites as a result of loss of offsite habitat will be avoided**, assuming that policy requirements are implemented as part of any site specific development proposals.

Traffic collision risk

Background

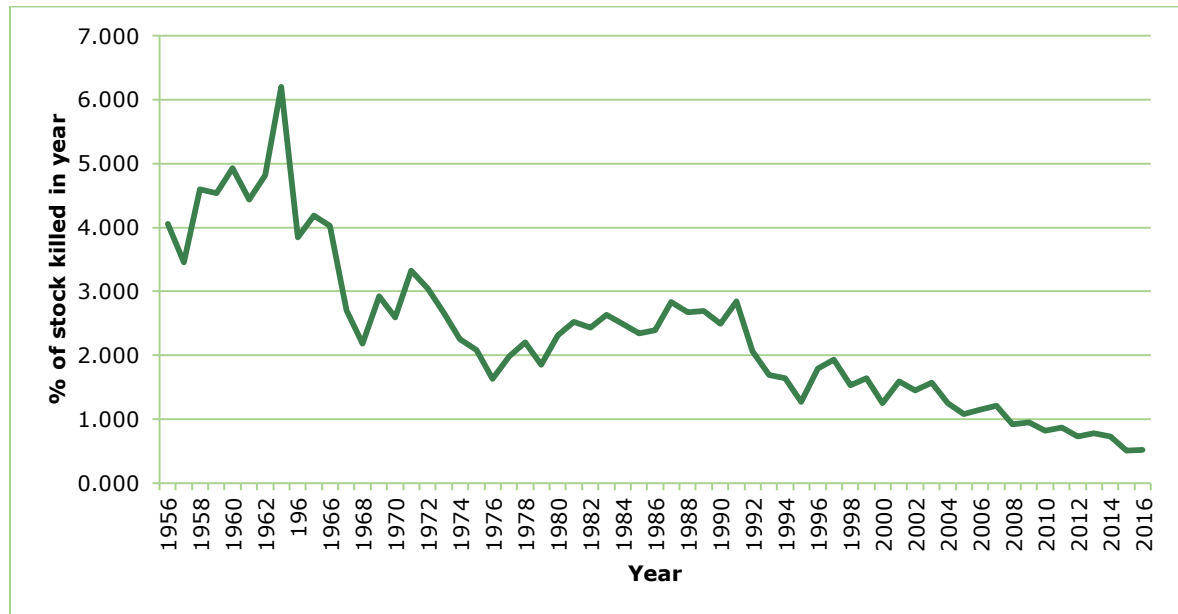
- 5.16 Rights exercised by commoners of the New Forest include the right to graze ponies, cattle, donkeys, sheep, and pigs on the Forest. Many of these animals are semi-wild and their browsing and grazing suppresses the growth of brambles, gorse and other coarse vegetation, helping to maintain the designated open habitats of New Forest SAC and Ramsar site.
- 5.17 During consultation on earlier stages of the HRA, Natural England raised a concern that development could result in an increase in traffic across the New Forest, making roads unsafe for grazing animals and necessitating fencing along the roadsides. If fencing is needed to protect animals, changes to the grazing pattern in the New Forest could, without mitigation, lead to loss of open habitats for which New Forest SAC and Ramsar site is designated, with knock-on effects on New Forest SPA designated bird species and New Forest Ramsar site fauna reliant on those habitats. While the amount of traffic growth associated with the small scale of development proposed by the NFNPA Local Plan alone is unlikely to be significant, when this is combined with commuter and visitor traffic growth from neighbouring areas, roads within and close to the New Forest could experience a significant increase in road traffic.
- 5.18 Traffic flows within and across the National Park relating to visitors and commuters are large and growing but data were unavailable to quantify the in combination traffic growth expected on roads that pass through or adjacent to the New Forest European designated sites. This section therefore assumes that road traffic through the New Forest will continue to grow and considers the available evidence on the likelihood that this will result in a significant increase in collisions with grazing animals and whether this, in turn, would be likely to necessitate roadside fencing which could adversely affect management of the designated open habitats of New Forest SAC and Ramsar site.

Is traffic growth likely to result in increased collisions with grazing animals?

- 5.19 The Verderers of the New Forest work in conjunction with the Forestry Commission (which manages the Forest on behalf of the Crown), Natural England, and with owners of other areas of common land within the Forest, such as the National Trust to protect and administer the New Forest's commoning practices and its related traditional landscape and wildlife. Their offices, powers and responsibilities are derived from an Act of Parliament in 1877 and subsequent Acts. As part of their work, the Verderers monitor and report⁷¹ on the numbers of commoners' livestock present in the New Forest and the number of these killed in road traffic accidents. Drawing on these data, Figure 5.1 shows the proportion of commoners' livestock killed in road traffic accidents in each year since 1956.

⁷¹ 'Road Traffic Accidents' report available from <http://www.verderers.org.uk>

Figure 5.1 Proportion of New Forest commoners' stock killed in road traffic accidents



- 5.20 As previously described, road traffic across the New Forest has grown significantly over the past years but it is clear from Figure 5.1 that the proportion of New Forest commoners' stock being killed in road traffic accidents has nevertheless shown a steady decline. This decline is thought to be a result of various management measures, as discussed below.

Would an increase in traffic collisions with grazing animals be likely to be managed by fencing?

- 5.21 It is likely that a significant contributor to the general decline in the traffic collision ratio seen between the mid-1950s and mid-1970s resulted from fencing of the major roads across the New Forest during this period, namely the A31, A35 and A337. However, since fencing of the major roads was completed the traffic collision ratio has continued to fall steadily. This is thought to be attributable to the active management of this issue by the NFNPA, Forestry Commission, Verderers, and other stakeholders, including:
- reducing speed limits on roads crossing the New Forest (for example A337 speed limits were reduced to 40 mph in the early 1990s) and operations to enforce speed limits across the National Park;
 - a Higher Level Stewardship scheme that funds the Verderers Grazing Scheme which contributes to the costs of reflective pony and cattle collars to increase the visibility of stock to drivers;
 - the Verderers work with County Highway staff in the use of warning signs, educational materials about the risk of collision with stock are distributed by stakeholders, and weekly animal accident statistics are distributed to the local press and published on the Verderers website, all of which help to influence driver behaviour;
 - a £1,000 reward for information leading to the successful prosecution and conviction of hit and run drivers;
 - stakeholders publicise a hotline to report traffic accidents involving New Forest stock;
 - a multi-agency Animal Accident Reduction Group which meets twice a year to review recent accident records and consider what more can be done to reduce accidents.
- 5.22 NFNPA monitors animal accident statistics collected by the Verderers and reports these through its State of the Park Reports. This will allow it to identify any reversal in the trend of long term reduction in traffic collision risk associated with development proposed by the Local Plan in combination with other plans and projects and take corrective action.

Conclusion of Appropriate Assessment of traffic collision risk

- 5.23 The review of information above has shown that road traffic growth does not inevitably lead to an increase in the risk of grazing animals on the New Forest being killed in collisions with road traffic. In fact, a suite of measures has been identified and is being actively employed by NFNPA and other stakeholder organisations to successfully manage the risk of road traffic collisions with grazing stock in the New Forest, resulting in a declining trend in the risk of animal accidents. In addition, NFNPA monitors animal accident statistics which will allow it to respond to any reversal of this long term trend by altering the mix and/or degree of such mitigation measures such as driver education and control of traffic speeds on affected roads. Since the roads presenting the highest collision risk have already been fenced and there is a broad range of other measures available with the potential to successfully manage risk, it should be possible to address such a reversal without additional fencing. In addition, any new fencing next to a highway, if over 1 metre in height, would require planning permission, providing an opportunity for project level HRA to assess potential effects on the New Forest European sites.
- 5.24 In light of the findings presented above it is concluded that **adverse effects on the integrity of New Forest European sites as a result of loss of traffic collision risk will be avoided.**

6 Summary and conclusions

Summary

- 6.1 The HRA at this stage has assessed the effects from the Regulation 19 Submission draft of the New Forest National Park Local Plan on European sites and to provide recommendations on how these could be ruled out by inclusion of appropriate safeguards within the emerging policies. In some cases it has also recommended that additional information be gathered to support a full assessment of the likely effects of the Local Plan. Table 6.1 summarises the findings of the HRA and the recommendations for policy changes or further assessment in relation to the types of effect not yet ruled out.

Table 6.1 Summary of HRA draft findings and recommendations

Effect type	HRA finding	Recommendation
Direct loss or physical damage to European sites	Likely significant effects ruled out.	None required.
Loss or damage to offsite supporting habitat	Screening was unable to rule out likely significant effects on the Avon Valley SPA and Ramsar site, Dorset Heathlands SPA, New Forest SPA, and Solent and Southampton Water SPA and Ramsar site, as a result of the loss of offsite habitat. Appropriate Assessment concluded that, adverse effects on the integrity of European sites as a result of loss of offsite habitat will be avoided as mitigation recommended by the Draft HRA has now been included in the Local Plan.	None required.
Urban edge effects	Likely significant effects ruled out.	None required.
Changes in air quality	Initial screening unable to rule out likely significant air quality effects in combination on Dorset Heaths SAC and Dorset Heathlands Ramsar site; New Forest SAC, SPA and Ramsar site; Solent Maritime SAC, Solent and Southampton Water SPA and Ramsar site. Air quality assessment ⁷² and linked ecological assessment ⁷³ carried out by third party consultants and reported on separately constitute the HRA of air quality effects for both the New Forest National Park and New Forest District Local Plans.	See ecological assessment ⁷⁴ carried out by third party consultants.
Traffic collision risk	Unable to rule out likely significant traffic collision risk effects in combination on the New Forest SAC, SPA and Ramsar sites on a precautionary basis due to absence of suitable traffic growth forecast. Appropriate Assessment concluded that adverse effects on the integrity of European sites as a result of traffic collision risk will be avoided.	None required.
Recreation pressure	Likely significant effects ruled out.	None required.
Changes in water quantity	Likely significant effects ruled out.	None required.

⁷² Air Quality Consultants (2017) Air quality input for Habitats Regulations Assessment: New Forest – Draft Report provided 21 December 2017

⁷³ BSG Ecology (2018) Ecological Consultancy Advice on Air Quality Risks – Draft Report provided 3 January 2018

⁷⁴ BSG Ecology (2018) Ecological Consultancy Advice on Air Quality Risks – Draft Report provided 3 January 2018

Effect type	HRA finding	Recommendation
Changes in water quality	Likely significant effects ruled out.	None required.

Conclusions

- 6.2 This report sets out the results and conclusions of the HRA of the NFNPA Regulation 19 Submission draft Local Plan except in relation to changes in air quality. For the effect types considered in this report, it is concluded that the Regulation 19 Submission draft of the Local Plan will not adversely affect the integrity of any European site, either alone or in combination with other plans and projects.
- 6.3 A separate air quality assessment⁷⁵ and linked ecological assessment⁷⁶ reported on separately and together constitute the HRA of air quality effects for both the New Forest National Park and New Forest District Local Plans. At the time of writing, these documents had not yet been finalised but emerging results indicate a requirement for vegetation monitoring complemented by a mitigation strategy in relation to the potential effects of changes in air quality on The New Forest SAC, SPA and Ramsar site. The separate reports should be consulted for a full understanding of this element of the HRA.

⁷⁵ Air Quality Consultants (2017) Air quality input for Habitats Regulations Assessment: New Forest – Draft Report provided 21 December 2017

⁷⁶ BSG Ecology (2018) Ecological Consultancy Advice on Air Quality Risks – Draft Report provided 3 January 2018

Appendix 1
European sites information

This Appendix contains relevant information about the following European sites:

- [River Avon SAC](#);
- [Avon Valley SPA](#);
- [Avon Valley Ramsar site](#);
- [Dorset Heaths SAC](#);
- [Dorset Heathlands SPA](#);
- [Dorset Heathlands Ramsar site](#);
- [Mottisfont Bats SAC](#);
- [The New Forest SAC](#);
- [New Forest SPA](#);
- [The New Forest Ramsar site](#);
- [River Itchen SAC](#);
- [Solent and Dorset Coast pSPA](#);
- [Solent and Isle of Wight Lagoons SAC](#);
- [Solent Maritime SAC](#);
- [Solent and Southampton Water SPA](#);
- [Solent and Southampton Water Ramsar site](#).

River Avon SAC

Site area: 416.57 ha

Overview of site and its location

The River Avon SAC is one of the richest chalk rivers in Europe. It is important for its fish population, invertebrate, which include populations of Desmoulins Whorl Snail and its in-river plant community habitat as well as bankside habitats.

Qualifying Features

H3260 Water courses of plain to montane levels with the *Ranunculion fluitantis* and *Callitriche-Batrachion* vegetation

S1016 *Vertigo moulinsiana*: Desmoulin's whorl snail

S1095 *Petromyzon marinus*: Sea lamprey

S1096 *Lampetra planeri*: Brook lamprey

S1106 *Salmo salar*: Atlantic salmon

S1163 *Cottus gobio*: Bullhead

Pressures and threats

Physical modification

The Strategic Framework for the Restoration of the River Avon (Halcrow and GeoData 2009) found 59% of the length of the River Avon, 36% Nadder, 33% Wylye, 23% Till, 6% Dockens and 2% Bourne to be partially, significantly or severely modified. Physical habitat modifications have caused simplification of the biotope mosaics (substrate types, variations in flow, channel width and depth, in-channel and side-channel sedimentation features, bank profiles, erosion features, in-channel and bankside vegetation cover and woody debris) and impact both on the SAC chalk stream habitat feature itself and also the

levels of populations of the SAC species it supports. The Site Improvement Plan proposes options for the full restoration, rehabilitation or enhancement covering the majority of the River Avon and associated watercourses.

Siltation

Excessive fine sediment supply can lead to the smothering of coarse substrates and the loss of flora and fauna dependent on them. Sources of silt include run-off from agricultural land, roads, sewage and fish farm discharges.

Water pollution

Elevated levels of phosphate (P) lead to dominance by algae and a loss of characteristic plant species. Organic pollution, reducing dissolved oxygen levels (from microbial breakdown of organic material) affects biota and is also an issue. Water quality can also affect the habitat quality necessary to support Desmoulin's whorl snail. Diffuse pollution from agriculture, small point discharges and wastewater treatment works (WwTW) discharges are contributing to elevated levels of nutrients (by 10-50ug/l P) and reduced dissolved oxygen levels in parts of the SAC. Catchment sensitive farming measures (including agri-environment scheme resource protection measures) are estimated to deliver approximately 10% (maximum 20%) reduction in P levels. Whilst nearly all WwTWs within the catchment have been limited to 1mg/l P, and the locations in the Avon catchment that show improving water quality trends generally coincide with improvements to WwTWs in that reach of river, it is likely that further reductions of P will be necessary from WwTWs and also small point sources.

Water abstraction

Water abstraction causes lower than natural river flows that affects a range of habitat factors including current velocity, water depth, wetted area, substrate quality, dissolved oxygen levels and water temperature. The maintenance of both flushing flows and base flows, based on natural hydrological processes, is vital to the sustaining the SAC chalk stream habitat as a whole and to fish species at low flows in particular.

Changes in species distributions

Salmon are declining and the population level is below the critical conservation level. The reason for the decline is not fully understood and may relate to external factors and climate change; however in-channel habitat, flows, siltation and temperature may also be significant contributing factors (refer to the EA River Avon Salmon and Sea Trout Site Action Plan). These factors are being fully or partly addressed through the implementation of various plans; however are limited by budgetary constraints. Desmoulin's whorl snail habitat is fragmented throughout the catchment and of varying quality. The main issue affecting the habitat being site dryness or scrub cover and where hydrologically feasible this is being addressed through agri-environment and Conservation Enhancement Schemes.

Invasive species

Invasive plants cause progressive deterioration of bankside habitats by impoverishing the botanical diversity and causing winter instability due to lack of year round plant cover. This can increase the risk of erosion and siltation and thereby affect fish spawning habitat and gravel habitat supporting characteristic submerged plant communities. Invasive animal species such as Signal crayfish are known to impact on riverine species such as Salmon, but in the Avon their population size, distribution and potential impact is not quantitatively known.

Hydrological changes

Desmoulin's whorl snail is an annual species and requires localities that are stable hydrologically. Changes in the hydrology that may affect the species include flooding or drying out due to low ground water levels which may be linked to either changing climate conditions or over-abstraction.

Inappropriate weed control

Insensitive weed cutting may impact on the chalk stream habitat and the fish species it supports.

Habitat fragmentation

The SAC boundary may not adequately cover the extent of all Annex 1 and Annex 2 features and/or their supporting habitats. Several of the headwaters and the tributaries that are not included within the

boundary of the SAC (or underpinning SSSI) are integral to and important to the natural functioning of the whole river system and also support the habitats and species for which the site is selected and/or notified. The headwaters are also particularly sensitive to abstraction pressures.

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.

Avon Valley SPA

Site area: 1351.1 ha

Overview of site and its location

The Avon Valley SPA is a wide river valley comprising mostly unimproved wet grassland and has importance for wintering wildfowl with Bewick's Swan and Gadwall as the notified features. The population of Bewick's Swan in the Avon Valley has decreased in line with a national trend of decrease, which is felt to be due to decreased breeding success. At the moment the SPA does not meet the threshold for them.

Qualifying Features

A037(NB) *Cygnus columbianus bewickii*: Bewick swan

A051(NB) *Anas strepera*: Gadwall

Pressures and threats

Water Pollution

Elevated levels of phosphate (P) lead to dominance by algae and a loss of characteristic plant species. Within Blashford Lakes high P levels could switch the system from a macrophyte dominated system to an algal dominated one resulting in poorer feeding conditions for gadwall. Organic pollution, reducing dissolved oxygen levels (from microbial breakdown of organic material) effects biota and is also an issue. Water quality can also affect the habitat quality necessary to support SPA species.

Changes in species distributions

Bewick's Swans are choosing to winter elsewhere even though the habitat in the SPA remains good for them.

Public Access/Disturbance

Dog walkers disturbing wildfowl in areas outside public rights of way is a concern.

Change in land management

Areas of wet grassland may become wetter due to higher river levels in summer. This may increase the difficulty of managing some areas of the floodplain by grazing and cutting in some years potentially impacting on the grazing quality for Bewick swans. This may be in part be linked to reduced weed

cutting in the river channel but also changing summer rainfall patterns (e.g. increased summer storminess) related to climate change

Habitat fragmentation

The SAC and SPA boundaries may not adequately cover the extent of all designated features and/or their supporting habitats, e.g. several of the headwaters and the tributaries that are not included within the boundary are integral to and important to the natural functioning of the whole river system and also support the habitats and species for which the site is selected and/or notified. The headwaters are also particularly sensitive to abstraction pressures.

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.

Avon Valley Ramsar site

Site area: 1385.1 ha

Overview of site and its location

The site encompasses the lower reaches of the River Avon and its floodplain between Bickton and Christchurch. The River Avon displays wide fluctuations in water level and parts of the valley are regularly flooded in winter. The Avon valley has a greater range of habitats and a more diverse flora and fauna than any other chalk river in Britain. The valley includes one of the largest expanses of unimproved floodplain grassland in Britain, including extensive areas managed as hay meadow.

Qualifying Features

Criterion 1: The site shows a greater range of habitats than any other chalk river in Britain, including fen, mire, lowland wet grassland and small areas of woodland.

Criterion 2: The site supports a diverse assemblage of wetland flora and fauna including several nationally-rare species.

Criterion 6: The site has species/populations occurring at levels of international importance.

Qualifying Species/populations (as identified at designation):

- Species with peak counts in winter: Gadwall, *Anas strepera strepera*

Species/populations identified subsequent to designation for possible future consideration under criterion 6.

- Species with peak counts in winter: Northern pintail, *Anas acuta* and Black-tailed godwit, *Limosa limosa islandica*.

Pressures and threats

Disturbance to vegetation through cutting / clearing

No information available.

Vegetation succession

Major issue arising from decline in traditional pastoral agriculture and lack of maintenance of ditch network.

Drainage/land-claim for agriculture

Management of water levels driven partly by agriculture but also urban flood risk management continues to have adverse effect on habitats.

Sedimentation/siltation

High levels of silt in river continue to degrade its interest, especially aquatic species but also contribute to silting-up ditches and deterioration of grasslands after flood events.

Introduction/invasion of non-native plant species

Crassula helmsii is increasing problem in Blashford Lakes following restoration of gravel pits, not controlled adequately through planning consents and technically difficult to control following withdrawal of herbicide approval.

Pollution – domestic sewage

No information available.

Pollution – agricultural fertilisers

No information available.

Recreational/tourism disturbance (unspecified)

Site is subject to wildfowling and game shooting, and associated activities (e.g. shooting hides, game cover management, pheasant release pens, etc.); full extent/intensity unknown but known to be considerable. Likewise fishing and related activities (e.g. fish stocking, vehicular and pedestrian access, fencing of river banks, vegetation management etc.). Access by people and dogs both on and off public rights of way is also a significant cause of disturbance in some areas.

Reservoir/barrage/dam impact: flow regime

No information available.

Conservation objectives

None available.

Dorset Heaths SAC

Site area: 5719.54 ha

Overview of site and its location

The Dorset heathlands is an extensive lowland heathland area in southern England. Formerly a single tract divided only by river valleys it is now fragmented. The heathlands comprise a wide range of different habitat types related to variation in soils, hydrology, water chemistry and land use history.

Qualifying Features

H4030 European dry heaths

H7230 Alkaline fens

H6410 *Molinia* meadows on calcareous, peaty or clayey-silt-laden soils (*Molinia caerulea*)

H4010 Northern Atlantic wet heaths with *Erica tetralix*

H7150 Depressions on peat substrates of the *Rhynchosporion*

H7210 Calcareous fens with *Cladium mariscus* and species of the *Caricion davallianae*

H9190 Old acidophilous oak woods with *Quercus robur* on sandy plains

S1044 *Coenagrion mercuriale*: Southern damselfly

S1166 *Triturus cristatus*: Great crested newt

Pressures and threats

Inappropriate Scrub Control

Invasion of heath by trees and scrub results, over the long term, in the loss of heathland vegetation.

Public Access and Disturbance

Public access and disturbance affect large parts of the site mainly in the area of Poole/Bournemouth. Effects include habitat change from nutrients in dog faeces, and dumping of garden rubbish. On a number of sites the illicit use of heaths for motorcycle scrambling is resulting in disturbance and erosion; however motorcycle use on heathlands has generally declined relative to previous levels in response to site wardening and alternative facilities being made available.

Undergrazing

Generally grazing has now been successfully introduced on most of the larger heathland sites but there remain some ungrazed areas which would benefit from the introduction of an extensive grazing regime.

Forestry and Woodland Management

Several of the heathlands have conifer plantations on former heathland (most planted after notification) or mature conifers (or sometimes birch) that have invaded heathland. Favourable condition requires removal of these plantations for heathland restoration or, at least, management to increase the heath component within the woodland.

Drainage

Drainage is generally the result of ditches made within the site to endeavour to drain wet heath or mire. These drains invariably result in adverse changes to wet heath and mire communities in the vicinity.

Water Pollution

Pollution from different sources affects a number of areas. It comprises of pollution from adjacent agricultural land (run-off causing nutrient enrichment); leaching from adjacent landfill sites (3 sites); pollution from foul drainage (septic tanks, sewage discharge); urban run-off. Poor water quality from the sources listed can also impede the ability to restore the sites' natural hydrology. Silt/sand run-off from adjacent sand/gravel workings and now capped landfill have smothered part of a mire system at Upton Heath. Successful remedial work in the above cases is difficult.

Invasive Species

Various invasive plant and fish species are present, and these have the potential to impact negatively on the site's features.

Habitat Fragmentation

Dorset's lowland heathland is a fragmented remnant of a once extensive landscape. Some 86% of Dorset's heathland has been lost since the 1800s, and the surviving area is broken into many fragments. This curtails the genetic and physical interchange of a number of species and leads to edge effects on smaller sites. Moreover, species populations that are dependent on the wider habitat network of heath and forest beyond the designated site boundaries are vulnerable to changes within that wider network.

Conflicting Conservation Objectives

Heathland management aimed at maintaining open heathland does not cater for a number of rare species that require more specific management measures.

Wildfire/Arson

Fire predominantly affects the urban heaths (about a third of the heathland area in and around Poole and Bournemouth) which are subject to arson. The result is that some heaths are burned too frequently and in spring and summer.

Air Pollution: impact of atmospheric nitrogen deposition

Air pollution impacts on the site's vegetation diversity. As with most lowland heathlands and mires in England N deposition is close to, and in some cases exceeds critical loads (e.g. For *Rhynchosporion*).

Deer

High deer numbers have affected heathland and mire on Arne Heath, Holton Heath and Stokeford Heath. Deer numbers are now being reduced and the habitats are recovering

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.

Dorset Heathlands SPA

Site area: 8184.96 ha

Overview of site and its location

The Dorset heathlands is an extensive lowland heathland area in southern England. Formerly a single tract divided only by river valleys it is now fragmented. The heathlands comprise a wide range of different habitat types related to variation in soils, hydrology, water chemistry and land use history.

Qualifying Features

A224(B) *Caprimulgus europaeus*: European nightjar

A246(B) *Lullula arborea*: Woodlark

A302(B) *Sylvia undata*: Dartford warbler

A082(NB) *Circus cyaneus*: Hen harrier

A098(NB) *Falco columbarius*: Merlin

Pressures and threats

Inappropriate scrub control

Invasion of heath by trees and scrub results, in the long term, loss of heathland vegetation which provide habitat for the qualifying bird species.

Public Access/Disturbance

Public access and disturbance affect large parts of the site mainly in the area of Poole/Bournemouth. Disturbance of breeding SPA birds, mostly by dogs, can affect their breeding success, with implications for population level effects e.g. nightjar and woodlark. Other effects include predation by domestic cats and urban foxes. On a number of sites the illicit use of heaths for motorcycle scrambling is resulting in

disturbance and erosion, however motorcycle use on heathlands has generally declined relative to previous levels in response to site wardening and alternative facilities being made available.

Forestry and woodland management

Several of the heathlands have conifer plantations on former heathland (most planted after notification) or mature conifers (or sometimes birch) that have invaded the heathland habitat favoured by the SPA's designated bird species.

Habitat fragmentation

Dorset's lowland heathland is a fragmented remnant of a once extensive landscape. Some 86% of Dorset's heathland has been lost since the 1800s, and the surviving area is broken into many fragments. This curtails the genetic and physical interchange of a number of species and leads to edge effects on smaller sites. Moreover, species populations that are dependent on the wider habitat network of heath and forest beyond the designated site boundaries are vulnerable to changes within that wider network.

Wildfire/ arson

Fire predominantly affects the urban heaths (about a third of the heathland area in and around Poole and Bournemouth) which are subject to arson. The increased frequency of fires and the timing of these (in spring and summer) may adversely affect the SPA's designated heathland birds.

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.

Dorset Heathlands Ramsar site

Site area: 6730.15 ha

Overview of site and its location

Extensive and fragmented, these heathland areas are centred around the estuary of Poole Harbour and are adjacent to the urban conurbation of Bournemouth and Poole. The heathland contains numerous examples of wet heath and acid valley mire, habitats that are restricted to the Atlantic fringe of Europe. These heath wetlands are among the best of their type in lowland Britain. There are also transitions to coastal wetland and fen habitat types. The wetland flora and fauna includes a large assemblage of nationally rare and scarce species, especially invertebrates.

Qualifying Features

Criterion 1: Contains particularly good examples of (i) northern Atlantic wet heaths with cross-leaved heath *Erica tetralix* and (ii) acid mire with *Rhynchosporion*.

Contains largest example in Britain of southern Atlantic wet heaths with Dorset heath *Erica ciliaris* and cross-leaved heath *Erica tetralix*.

Criterion 2: Supports 1 nationally rare and 13 nationally scarce wetland plant species, and at least 28 nationally rare wetland invertebrate species.

Criterion 3: Has a high species richness and high ecological diversity of wetland habitat types and transitions, and lies in one of the most biologically-rich wetland areas of lowland Britain, being continuous with three other Ramsar sites: Poole Harbour, Avon Valley and The New Forest.

Pressures and threats

Acid rain

Modelling by the relevant air quality authority indicates that the average or minimum deposition from airborne SO_x and NO_x exceed the maximum critical load for acidity on at least part of the site.

Pollution – unspecified

No information available.

Conservation objectives

None available

Mottisfont Bats SAC

Site area: 196.55 ha

Overview of site and its location

The Mottisfont woodland, which is near Romsey in Hampshire, supports an important population of the rare Barbastelle bat *Barbastella barbastellus*. Mottisfont contains a mix of woodland types including hazel *Corylus avellana* coppice with standards, broadleaved plantation and coniferous plantation which the bats use for breeding, roosting, commuting and feeding.

Qualifying Features

S1308 *Barbastella barbastellus*: Barbastelle bat

Pressures and threats

Feature location/ extent/ condition unknown

Barbastelle bats use a number of sites for roosts through the breeding season. The last full survey which involved radio-tracking to identify the distribution of bats around the site was carried out in 2002. The current annual Bat Conservation Trust survey contract provides basic presence information on an annual basis in two thirds (4 of 6 compartments) of the designated site through bat detector surveys. Annual knowledge and detailed knowledge of the presence and distribution of the bats over the remaining one third of the site are both needed.

Forestry and woodland management

There are existing felling licences and England Woodland Grant Scheme agreements which do not take account of the designation and are not managing the habitat with the Barbastelle bat population in the woodland in mind.

Offsite habitat availability/ management

Offsite areas of habitat may be important for the SAC bat population but insufficient information is available to guide management of these.

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 the habitats of qualifying species;
- the structure and function of the habitats of qualifying species;
- the supporting processes on which the habitats of qualifying species rely;
- the populations of qualifying species; and

- the distribution of qualifying species within the site.

The New Forest SAC

Site area: 29213.57 ha

Overview of site and its location

The New Forest is a large and complex ecosystem and one of the largest remaining relatively wild areas in the South of England attracting enormous numbers of visitors each year.

The New Forest SAC supports an extensive and complex mosaic of habitats including wet and dry heaths and associated bogs and mires, wet and dry grasslands, ancient pasture woodlands, frequent permanent and temporary ponds and a network of streams and rivers. These habitats support an exceptional variety of flora and fauna including internationally important populations of breeding and over-wintering birds and other notable species such as southern damselfly, stag beetle and great crested newt.

The New Forest is one of the most important sites for wildlife in the UK and recognised as being of exceptional importance for nature conservation throughout the European Union. Over 90% of the SAC comprises the unenclosed land of the Crown Lands and adjacent commons, while the remainder is managed by private owners and occupiers. Of fundamental importance to sustaining the exceptional quality on the open forest is the persistence of commoning- the commoners stock roam freely, maintaining the structural diversity and richness of the habitats complemented by annual heathland cutting and burning programmes.

There are many pressures and threats to the condition of the New Forest SAC the main ones being:

- A significant long term reduction in grazing pressure through loss of commoning. This would lead to a dramatic change in the flora and fauna of the New Forest and the impoverishment of the special features for which it was designated.
- Impacts of recreation including disturbance to qualifying species and compaction, abrasion and other modifications to vegetation, soils and watercourses.
- Historic drainage of wetlands which leads to a loss of extent of wetland habitats such as wet heath, mire, riverine and bog woodland.
- Silviculture plantations with recognisable remnants of SAC Annex 1 habitats such as heathland, mire, lawn, riverine and bog woodland.
- Loss of traditional management practices which can lead to a loss of extent and diversity of open habitats.

The main stakeholders within the New Forest are committed to its protection and as a result there are some key mechanisms already in place:

- Recreational Management Strategy - The Strategy seeks to guide and influence recreation and spatial planning policy and implementation across the whole of the National Park and adjoining areas. The implementation of the Strategy will be overseen by the RMS Steering Group of key statutory bodies this currently consists of the Forestry Commission, the National Park Authority, the Verderers and Natural England.
- Higher Level Environmental Stewardship - currently supports major projects such as restoring wetlands and grasslands, tackling conifer regeneration and restoring plantations, supporting commoning and undertaking surveys of SPA bird populations and other species.
- The Forest Design Plan for the New Forest Inclosures was produced by the Forestry Commission in 2007 and sets out the management proposals for a period of twenty years for the Crown Land inclosure woodlands.
- Commoners Dwelling Scheme - provides a way for commoners to enter into a legal agreement which allows them to apply for planning permission so they can build a home outside the New Forest villages and continue their tradition of commoning in the forest.

- Local Development Plans - both the New Forest National Park and District Council have policies and/or supplementary planning guidance which secures financial contributions (and direct delivery of open space in the case of larger developments in NFDC) to fund the delivery of new open space provision, access management initiatives and other management measures in order to ensure the impacts of new residential developments are avoided or mitigated.

Qualifying Features

H7140 Transition mires and quaking bogs

H7150 Depressions on peat substrates of the *Rhynchosporion*

H3110 Oligotrophic waters containing very few minerals of sandy plains (*Littorelletalia uniflorae*)

H3130 Oligotrophic to mesotrophic standing waters with vegetation of the *Littorelletea uniflorae* and/or of the *Isoëto-Nanojuncetea*

H4010 Northern Atlantic wet heaths with *Erica tetralix*

H4030 European dry heaths

H6410 Molinia meadows on calcareous, peaty or clayey-silt-laden soils (*Molinion caeruleae*)

H7230 Alkaline fens

H9120 Atlantic acidophilous beech forests with *Ilex* and sometimes also *Taxus* in the shrub layer (*Quercion roburipetraeae* or *Ilici-Fagenion*)

H9130 *Asperulo-Fagetum* beech forests

H9190 Old acidophilous oak woods with *Quercus robur* on sandy plains

Pressures and threats

Drainage

A legacy of 150 years of drainage of mires, wet heathlands, wet grasslands and streams to improve grazing has led to a loss of peat, reduction of habitat condition, bracken and scrub encroachment. A programme of restoration has been going on for the past 10 years and around 3500ha of mire and streams has been identified as still requiring restoration.

Inappropriate Scrub Control

Lack of management and grazing, and inappropriate drainage has led to the loss of open habitats through encroachment of scrub and secondary woodland.

Fish Stocking

Hatchet Pond, whilst not actively stocked, is managed as a coarse fishery including carp and bream. The common practice of ground baiting, which is popular with carp fisherman, can introduce nutrients and there may also be deliberate extra feeding to encourage growth of specimen sized fish. In addition, benthivorous fish contribute nutrient through their feeding habits. This has contributed to high turbidity and algal biomass putting the submerged flora at risk. Public disturbance and invasive species have also contributed to the declining condition of Hatchet Pond.

Deer

High levels of browsing prevent regeneration and cause a decline in the shrub and field layer of woodlands. The Forestry Commission and other land owners are actively managing the deer population and cooperating in existing strategies but levels are still perceived to be high.

Air Pollution: impact of atmospheric nitrogen deposition

Air pollution impacts on vegetation diversity. Aerial deposits of nitrogen may exceed the threshold limits above which the quality and character of vegetation begins to be altered and adversely impacted. This could potentially lead to a loss or change of habitat type which in turn will impact on species reliant on that habitat.

Public Access/Disturbance

The New Forest attracts high numbers of visitors annually and there is an assumption that disturbance affects SAC habitats through erosion, compaction and damage to vegetation and water bodies. Investigation into understanding the impact of recreation is required and recreation should be managed to minimise the impact and protect the European features. Hatchet pond attracts high numbers of visitors, walkers along the shoreline have eroded the banks and introduced sediment into the water, this together with feeding of birds and fishing activities has polluted the water and put the habitat at risk. Many of the 10 designated campsites within the New Forest are located in sensitive areas and have impoverished vegetation due to trampling and infrastructure. Sites in or adjacent to pasture woodland in particular are likely to progressively decline due to the impact on tree regeneration, levels of dead wood, lichens and ground flora.

Change in land management

Restoration of conifer plantation to heathland and grassland habitats is taking place throughout the New Forest on private land, on the adjacent commons and on the Crown Lands where the Verderers Inclosures are being returned to open forest. Following initial felling there is often extensive regeneration of conifer which requires management. Lack of funds for follow-up management could lead to a failure of the restoration.

Water Pollution

Many villages have properties that are not on mains sewerage and have domestic treatment units which discharge into ditches and streams that are either within or flow into the SAC. The ditches and streams have seasonal flow and this in combination with a number of properties all discharging into the same channel could lead to an increase in nutrient levels impacting on the habitats they flow through, reducing species richness and diversity.

Forestry and woodland management

Lack of management of woodlands in private ownership has led to loss of characteristic ground flora and shrubs and threat from non-natives such as scots pine, turkey oak and rhododendron. Artificial drainage can impact on wetter habitats leading to loss of sphagnum and bryophytes.

Inappropriate ditch management

Ditches alongside tracks, roads, private property and for forestry practices can impact on wet habitats which causes a loss or conversion of habitat. Drainage into streams and bogs can carry silt adding nutrients and negatively impacting on species relying on the low nutrient status of the habitats.

Invasive species

A wide range of non-native invasive species such as *Crassula helmslii*, parrots feather, pitcher plant, rhododendron, turkey oak and Himalayan balsam can be found within the SAC habitats of the New Forest. Many non-native species invade and out compete native species.

Parking

Much of the SAC is unfenced with open access and numerous roads crisscrossing the site. Although the area is well served by car parks, parking on the verges is common, this is a particular problem in villages with parking on verges outside properties, village greens and Manorial wastes. This leads to a loss of vegetation, compaction of the soil and pollution. There are a variety of solutions available but funding will be required.

Inappropriate cutting/mowing

Loss of traditional hay cutting, grazing and scrub management in privately owned meadows and heathlands leading to a loss or conversion of habitat.

Direct impact from 3rd party

Private property owners modify verges which are SAC habitats outside of their ownership. Issues include: creating new drives; re-turfing; planting hedges; encroachment by moving boundaries, and storage of material and equipment.

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.

New Forest SPA

Site area: 27968.96 ha

Overview of site and its location

The New Forest is a large and complex ecosystem and one of the largest remaining relatively wild areas in the South of England attracting enormous numbers of visitors each year.

Further description of the site is provided under New Forest SAC above

There are many pressures and threats to the condition of the New Forest SPA the main ones being:

- Impacts of recreation including disturbance to qualifying SPA species.
- The pressures and threats described for the New Forest SAC (above), resulting in changes to the flora and fauna of the New Forest and the SPA birds that use these for habitat

This plan does not cover issues where mechanisms are already in place or ongoing management activities which are required for maintenance. Existing mechanisms for protection of the New Forest and its designated features are described under New Forest SAC above.

Qualifying Features

A072(B) *Pernis apivorus*: European honey-buzzard

A082(NB) *Circus cyaneus*: Hen harrier

A099(B) *Falco subbuteo*: Eurasian hobby

A224(B) *Caprimulgus europaeus*: European nightjar

A246(B) *Lullula arborea*: Woodlark

A302(B) *Sylvia undata*: Dartford warbler

A314(B) *Phylloscopus sibilatrix*: Wood warbler

Pressures and threats

Inappropriate scrub control

Lack of management and grazing, and inappropriate drainage has led to the loss of open habitats through encroachment of scrub and secondary woodland with potential knock-on effects on the SPA bird species using these habitats.

Air Pollution: impact of atmospheric nitrogen deposition#

Air pollution impacts on vegetation diversity. Aerial deposits of nitrogen may exceed the threshold limits above which the quality and character of vegetation begins to be altered and adversely impacted. This could potentially lead to a loss or change of habitat type which in turn will impact on species reliant on that habitat.

Public Access/Disturbance

The New Forest attracts high numbers of visitors annually and there is an assumption that disturbance affects the breeding success of SPA birds. The pressures are not fully understood but a recent study concluded that nightjar, woodlark and Dartford warbler densities are notably low compared with other large heathland areas such as the Dorset Heaths and Thames Basin Heaths. Investigation into understanding the impact of recreation is required and recreation should be managed to minimise the impact and protect the European designated features.

Change in land management

Restoration of conifer plantation to heathland and grassland habitats is taking place throughout the New Forest on private land, on the adjacent commons and on the Crown Lands where the Verderers Inclosures are being returned to open forest. Following initial felling there is often extensive regeneration of conifer which requires management. Lack of funds for follow-up management could lead to a failure of the restoration with potential knock-on effects on the SPA birds that rely on open habitats.

Inappropriate cutting/mowing

Loss of traditional hay cutting, grazing and scrub management in privately owned meadows and heathlands leading to a loss or conversion of habitat with potential knock-on effects on the SPA birds that rely on open habitats.

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.

The New Forest Ramsar site

Site area: 28002.81 ha

Overview of site and its location

The New Forest is an area of semi-natural vegetation including valley mires, fens and wet heath within catchments whose uncultivated and undeveloped state buffer the mires against adverse ecological change. The habitats present are of high ecological quality and diversity with undisturbed transition zones.

The suite of mires is regarded as the locus classicus of this type of mire in Britain. Other wetland habitats include numerous ponds of varying size and water chemistry including several ephemeral ponds and a network of small streams mainly acidic in character which have no lowland equivalent in the UK. The plant communities in the numerous valleys and seepage step mires show considerable variation, being affected especially by the nutrient content of groundwater. In the most nutrient-poor zones, Sphagnum bog-mosses, cross-leaved heath, bog asphodel, common cottongrass and similar species predominate. In more enriched conditions the communities are more fen-like

Qualifying Features

Criterion 1: Valley mires and wet heaths are found throughout the site and are of outstanding scientific interest. The mires and heaths are within catchments whose uncultivated and undeveloped state buffer the mires against adverse ecological change. This is the largest concentration of intact valley mires of their type in Britain.

Criterion 2: The site supports a diverse assemblage of wetland plants and animals including several nationally rare species. Seven species of nationally rare plant are found on the site, as are at least 65 British Red Data Book species of invertebrate.

Criterion 3: The mire habitats are of high ecological quality and diversity and have undisturbed transition zones. The invertebrate fauna of the site is important due to the concentration of rare and scarce wetland species. The whole site complex, with its examples of semi-natural habitats is essential to the genetic and ecological diversity of southern England.

Pressures and threats

Commercial-scale forest exploitation

No information available.

Drainage/land-claim (unspecified)

No information available.

Introduction/invasion of non-native plant species

No information available.

Recreational/tourism disturbance (unspecified)

No information available.

Conservation objectives

None available.

River Itchen SAC

Site area: 303.98 ha

Overview of site and its location

The River Itchen is one of the 'classic' chalk rivers of southern England, drawing most of its character from this geological stratum. The Itchen supports an abundant and exceptionally species rich aquatic flora. It river discharges via Southampton Water into the Solent which has a range of habitat designations. The Itchen faces numerous pressures from water abstraction and flow diversions, discharges, agricultural runoff, channel modifications, fisheries management and human impacts associated with the urbanisation alongside much of the river's valley.

Qualifying Features

H3260 Water courses of plain to montane levels with the *Ranunculion fluitantis* and *Callitriche-Batrachion* vegetation

S1044 *Coenagrion mercurial*: Southern damselfly

S1163 *Cottus gobio*: Bullhead

S1092 *Austropotamobius pallipes*: White-clawed (or Atlantic stream) crayfish

S1096 *Lampetra planeri*: Brook lamprey

S1106 *Salmo salar*: Atlantic salmon

S1355 *Lutra lutra*: Otter

Pressures and threats

Water pollution

Numerous issues with diffuse water pollution, in addition to point sources from Waste Water Treatment Works. Pollution causes excessive algal growth, smothering macrophytes, and increased BOD, decreasing oxygen availability for spawning gravels used by salmon and trout.

Physical modification

A range of physical modifications affect the Annex I river habitat, which have adverse consequences for characteristic biological communities of the habitat including specifically notified species. Modifications include weirs and other in-channel structures causing impoundment, siltation and interruptions to biological movements, overdeepening, over-widening and straightening of channels, and bank re-sectioning and reinforcement.

Siltation

Siltation resulting from a variety of factors (direct inputs of silt into the system from land use, runoff from diffuse sources, deposition arising from impoundments and overwide channels) is a widespread problem affecting the Annex I river habitat, with consequences for macrophytes, southern damselfly habitat (where in ditches) and spawning gravels for fish.

Overgrazing

Impacts of over-grazing on river banks and wet meadow systems, removing riparian and meadow habitat and causing runoff into watercourses.

Water abstraction

Abstraction modifies the natural flow regime on which the Annex I river habitat depends for its proper functioning. Impacts may occur on habitat character and habitat extent, within the channel or in riparian wetland areas. All parts of the flow regime may be affected but low-to-intermediate flows are most likely to be significantly impacted. Abstraction should not impact on floodplain SAC features such as southern damselfly, as well as riverine features such as salmon. Effects on the habitat can have various effects on individual notified species. Activities outside of the SAC may also have detrimental impacts on site features and habitats. Natural England does not endorse any particular solution at this time.

Inappropriate weed control

Management of aquatic weed for fishery activities affects protected habitats e.g. *Ranunculus*. This is activity is currently exempted under the OLDs list (Operations Likely to Damage), and the extent and level of impacts on the watercourse is not conclusively known.

Hydrological changes

Some locations on the floodplains are too dry, with reasons not clear - impacts on ditches (decreased flowing water) for southern damselfly and meadow flora.

Inappropriate water levels

Water levels are not appropriate. The Water Level Management Plan (Natural England with Environment Agency) agreed options to re-wet the floodplain, benefitting flora and connecting habitat for southern damselfly. These need re-appraisal and implementation where possible.

Change in land management

Risk of non-compliance with HLS agreements may be affecting water quality of the river and floodplain carriers.

Inappropriate cutting/mowing

There are some instances of inappropriate management of riverbanks, which impacts on marginal habitat, with consequences for riparian and in-channel biota. These affect the biota using the riparian zone directly, and the biota of the river channel in terms of reducing bankside cover and enhancing silt inputs. Better bankside management can help prevent runoff from adjacent fields into the river, protecting water quality.

Invasive species

The presence of signal crayfish in parts of the catchment is suspected posing a significant risk to the white-clawed crayfish population through crayfish plague. However, white-clawed crayfish populations are fragmented, and therefore direct impacts from signals suspected not to be significant. Also there are widespread issues with Himalayan and orange balsam along the riparian corridor but the extent of the problem is unknown.

Undergrazing

Undergrazing impacts on wet meadow systems, causing degradation of southern damselfly habitat in particular. Bridges are required to access and manage sites and prevent SAC condition to deteriorate. This requires special project funding, which is currently prohibited in HLS agreements.

Inappropriate ditch management

Some ditches are not managed, leading to reed encroachment, reducing flow and therefore prohibiting southern damselfly breeding habitat.

Inappropriate scrub control

Inappropriate scrub control impacts particularly around ditches for southern damselfly, where scrub shades some ditches, preventing growth of marginal plants for egg-laying, and reduce flow in ditches.

Forestry and woodland management

Some parts of channel are excessively shaded by wet woodland, impacting on the macrophyte community. The River Restoration Strategy identifies some stretches where excessive shading is causing a problem, but it is important to look at whole catchment, and assess against all SAC features when reviewing locations/actions. Some stretches may benefit from tree planting to reduce water temperatures, particularly in light of climate change, but must again be carefully assessed.

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.

Solent and Dorset Coast pSPA

Site area: 89,078.02 ha

Overview of site and its location

The site is located on the south coast within the English Channel and extends from the Isle of Purbeck in the West to Bognor Regis in the East, following the coastline on either side to the Isle of Wight and into Southampton Water.

There are already four Special Protection Areas (SPAs) within the Greater Solent that are designated for breeding terns. These are Chichester & Langstone Harbours SPA (for Sandwich and Little tern), the Solent and Southampton Water SPA (for Common, Sandwich and Little tern) and Pagham Harbour SPA (Little tern). The fourth associated SPA lies within Poole Harbour (Common Tern and Sandwich tern). The potential new SPA covers the principal sea area that the breeding terns use for foraging during April-September. Whilst management measures are already in place in this foraging area due to the existing SPA, the classification of this new site will provide clarity to stakeholders about the areas the terns forage within and the species that require consideration.

Qualifying Features

The site regularly supports more than 1% of the Great Britain breeding populations of the following three species listed in Annex I of the Birds Directive:

A193(B) *Sterna hirundo*: Common tern

A191(B) *Sterna sandvicensis*: Sandwich tern

A195(B) *Sterna albifrons*: Little tern

Pressures and threats

Not yet identified for this pSPA.

Conservation objectives

Not yet defined for this pSPA.

Solent and Isle of Wight Lagoons SAC

Site area: 37.93 ha

Overview of site and its location

The Solent and Isle of Wight Lagoons SAC on the south coast of England encompasses a series of coastal lagoons, including percolation, isolated and sluiced lagoons. The site includes a number of lagoons in the marshes in the Keyhaven – Pennington area, at Farlington Marshes in Langstone Harbour, behind the sea-wall at Bembridge Harbour and at Gilkicker, near Gosport.

The lagoons show a range of salinities and substrates, ranging from soft mud to muddy sand with a high proportion of shingle, which support a diverse fauna including large populations of three notable species:

the nationally rare foxtail stonewort *Lamprothamnium papulosum*, the nationally scarce lagoon sand shrimp *Gammarus insensibilis*, and the nationally scarce starlet sea anemone *Nematostella vectensis*.

Qualifying Features

H1150 Coastal lagoons

Pressures and threats

Hydrological changes

Sluices around the lagoons, particularly in East Hampshire and the Isle of Wight are in poor condition/potentially not functioning fully. This causes water quality issues and changes in the hydrology of the lagoons. Freshwater streams and land and golf course drainage also threaten the salinity and water quality of the lagoons. Lagoon habitat is being created where tidal sluices are not functioning as originally designed and are letting in sea water resulting in good quality lagoon habitat in new areas. Inclusion of the lagoons into the designation will enable effective management of this habitat and ensure the designation is scientifically robust

Inappropriate weed control

There is a history of algaecide application to the Gilkicker lagoons during the management of the golf course. The algaecide can have detrimental effects on the lagoonal vegetation and associated specialist fauna. Should this practice continue unmanaged this could impact on the SAC.

Coastal squeeze

Sea level rise and coastal defence threaten salinity and area of lagoons. Flooding, percolation and infiltration from sea level rise and extreme weather can alter the salinity balance of the lagoons. Flood defences or managed retreat may reduce the area of low-lying fringe habitats. Current compensation provides required habitat for Epoch 1 of the Shoreline Management Plan 2 (SMP2), further investigation is required for Epoch 2 and 3. This project will utilise outputs from Shoreline Management Plans, the Environment Agency's Regional Habitat Creation Project and the New Forest District Council/Channel Coastal Observatory's Solent Dynamic Coast Project.

Invasive species

Marine Invasive Non-Native Species (INNS) are known to be introduced and subsequently spread through commercial shipping (through the release of ballast water and biofouling on hulls); recreational boating (through biofouling on hulls); aquaculture (through contamination of imported/moved stock or escaped stock), and natural dispersal. If present, INNS pose a threat to SAC lagoon habitats by displacing or preying upon native species, by destroying habitats, or by introducing new diseases or parasites.

Air pollution

Nitrogen deposition exceeds the site-relevant critical load for ecosystem protection and hence there is a risk of harmful effects, but the sensitive features are currently considered to be in favourable condition on the site. This requires further investigation.

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

Solent Maritime SAC

Site area: 11243.12 ha

Overview of site and its location

The Solent is a complex site encompassing a major estuarine system on the south coast of England. The Solent and its inlets are unique in Britain and Europe for their hydrographic regime with double tides, as well as for the complexity of the marine and estuarine habitats present within the area. Sediment habitats within the estuaries include extensive areas of intertidal mudflats, often supporting eelgrass *Zostera* spp. and green algae, saltmarshes and natural shoreline transitions, such as drift line vegetation.

All four species of cordgrass found within the UK are present within the Solent and it is one of only two UK sites with significant amounts of the native small cordgrass *Spartina maritima*. The SAC contains rich intertidal mudflats, saltmarsh, shingle beaches and adjacent coastal habitats, including grazing marsh, reedbeds and damp woodland.

Qualifying Features

H1110 Sandbanks which are slightly covered by sea water all the time

H1320 *Spartina* swards (*Spartinion maritimae*)

H1330 Atlantic salt meadows (*Glauco-Puccinellietalia maritimae*)

S1016 *Vertigo moulinsiana*: Desmoulin's whorl snail

H1130 Estuaries

H1210 Annual vegetation of drift lines

H1220 Perennial vegetation of stony banks

H1140 Mudflats and sandflats not covered by seawater at low tide

H2120 Shifting dunes along the shoreline with *Ammophila arenaria* ("white dunes")

H1150 Coastal lagoons

H1310 *Salicornia* and other annuals colonising mud and sand

Pressures and threats

Public Access/Disturbance

Recreational activities can affect annual vegetation of drift lines (H1210) and the vegetation of stony banks (H1220).

Coastal squeeze

Habitats are being lost as they are squeezed between rising sea levels and hard coastal defences that are maintained. There is a direct impact due to loss of the SAC habitats such as saltmarsh. In some areas rising sea levels will result in coastal grasslands being lost to more saline grasslands. The habitats that are lost could be created elsewhere, but there is difficulty in finding suitable areas. The neutral grassland habitats will take a long time to create as mitigation, but intertidal habitat can be created relatively quickly. Current compensation provides required habitat for Epoch 1 of the Shoreline Management Plan 2, further investigation is required for Epoch 2 and 3. This project will utilise outputs from Shoreline Management Plans, the Environment Agency's Regional Habitat Creation Project and the New Forest District Council/Channel Coastal Observatory's Solent Dynamic Coast Project.

Water pollution

Water pollution affects a range of habitat at the site through eutrophication and toxicity. Sources include both point source discharges (including flood alleviation / storm discharges) and diffuse water pollution from agriculture / road runoff, as well as historic contamination of marine sediments, primarily from copper and Tributyltin (TBT). A position statement from the Environment Agency and Natural England on water quality in the Solent and housing growth confirms the need to control nitrogen inputs to the Solent

from development growth.⁷⁷ Environment Agency flood event discharge consents allow untreated waters to be discharged which end up in the SAC and are likely to have a negative impact. There is a threat of spillage from oil transportation and transfer and by the usage by ships and pilotage.

Changes in species distributions

Areas of salt-marsh are eroding and decreasing.

Climate change

Climate change has resulted in rising sea level causing flooding to habitats.

Change to site conditions

There is an increasing loss of salt-marsh in much of the Solent for reasons unknown, and this needs to be investigated.

Invasive species

The highest risk pathways through which marine INNS are introduced and then spread have been identified as: commercial shipping (through release of ballast water, and biofouling on hulls); recreational boating (through biofouling on hulls); aquaculture (through contamination of imported or moved stock - or escaped stock in the case of the pacific oyster), and natural dispersal.

Direct land take from development

Private sea defences are causing disruption to the natural processes of allowing erosion to move sediments around the SAC.

Air Pollution: impact of atmospheric nitrogen deposition

Nitrogen deposition exceeds site relevant critical loads. Locally observed effects are unknown.

Hydrological changes

Titchfield Haven has a high level of water abstraction licences - if all were used then water levels would be too low in the SAC. Percolation of sea water through sea walls is causing saline intrusion into non-saline grassland habitats and changing them.

Direct impact from 3rd party

Off-roading is causing damage to some areas of grassland. Private sea defences are causing disruption to the natural movement processes of natural materials along the coast. House boats are unlicensed and have the potential to cause damage to intertidal habitats. Fly grazing is causing issues affecting large areas of Chichester Harbour.

Extraction: non-living resources

Shingle extraction for aggregates may have an adverse impact upon intertidal fauna and flora, and may affect the movement of coastal sediments that would in turn have an impact upon intertidal habitats.

Other

SAC boundary may not cover the extent of all Annex 1 and Annex 2 features and/or supporting habitats.

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

⁷⁷ Addressing the needs of housing growth and protecting the marine environment in the Solent area, Environment Agency and Natural England, 2015.

- 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.

Solent and Southampton Water SPA

Site area: 5401.12 ha

Overview of site and its location

The Solent is a complex site encompassing a major estuarine system on the south coast of England. The Solent and its inlets are unique in Britain and Europe for their hydrographic regime with double tides, as well as for the complexity of the marine and estuarine habitats present within the area. Sediment habitats within the estuaries include extensive areas of intertidal mudflats, often supporting eelgrass *Zostera* spp. and green algae, saltmarshes and natural shoreline transitions, such as drift line vegetation.

The rich intertidal mudflats, saltmarsh, shingle beaches and adjacent coastal habitats, including grazing marsh, reedbeds and damp woodland, support nationally and internationally important numbers of migratory and over-wintering waders and waterfowl as well as important breeding gull and tern populations.

Qualifying Features

A046a(NB) *Branta bernicla bernicla*: Dark-bellied brent goose

A052(NB) *Anas crecca*: Eurasian teal

A156(NB) *Limosa limosa islandica*: Black-tailed godwit

Waterbird assemblage

A176(B) *Larus melanocephalus*: Mediterranean gull

A191(B) *Sterna sandvicensis*: Sandwich tern

A192(B) *Sterna dougallii*: Roseate tern

A193(B) *Sterna hirundo*: Common tern

A195(B) *Sterna albifrons*: Little tern

A137(NB) *Charadrius hiaticula*: Ringed plover

Pressures and threats

Public Access/Disturbance

Many human activities in the area can disturb birds. This includes activities such as walking; dog walking; bird watching; boating; kayaking; kite surfing; hang gliding; paramotors; jet skis; wildfowling; model helicopters/aircraft; boat mooring, and hovercraft usage.

Coastal squeeze

Habitats are being lost as they are squeezed between rising sea levels and hard coastal defences that are maintained. There is an impact on birds due to the loss of habitat for feeding, roosting and breeding. In some areas rising sea levels will result in coastal grasslands being lost to more saline grasslands, thus losing habitat for some breeding waders of the waterbird assemblage. The habitats that are lost could be created elsewhere, but there is difficulty in finding suitable areas. The neutral grassland habitats will take a long time to create as mitigation, but intertidal habitat can be created relatively quickly. Current compensation provides required habitat for Epoch 1 of the Shoreline Management Plan 2, further investigation is required for Epoch 2 and 3. This project will utilise outputs from Shoreline Management

Plans, the Environment Agency's Regional Habitat Creation Project and the New Forest District Council/Channel Coastal Observatory's Solent Dynamic Coast Project.

Fisheries: Commercial marine and estuarine

Towed gear, hand gathering of shellfish, bait digging and aquaculture are the main fishery activities in this site. These have the potential to adversely affect the prey species on which the designated bird species rely in not appropriately managed.

Water pollution

Water pollution affects a range of habitat and bird species at the site through eutrophication and toxicity. Sources include both point source discharges (including flood alleviation / storm discharges) and diffuse water pollution from agriculture / road runoff, as well as historic contamination of marine sediments, primarily from copper and Tributyltin (TBT). A position statement from the Environment Agency and Natural England on water quality in the Solent and housing growth confirms the need to control nitrogen inputs to the Solent from development growth.⁷⁸ Environment Agency flood event discharge consents allow untreated waters to be discharged which end up in the SAC and are likely to have a negative impact. There is a threat of spillage from oil transportation and transfer and by the usage by ships and pilotage.

Changes in species distributions

Many waders and wildfowl are decreasing in the Solent probably as they move north and east under national trends. Some fish, such as sand eels, may be moving their breeding grounds resulting in less food availability for breeding terns. Invertebrate populations in the intertidal muds are changing and this may disadvantage some wintering wader species. Areas of salt-marsh are eroding and decreasing resulting in decreasing breeding gulls and terns as their habitat decreases and decreasing plant species of salt-marshes.

Climate change

Climate change has impacts upon coastal species, in that gull and tern colonies are more frequently washed out with rising sea levels when storm surges cause flooding to habitats.

Change to site conditions

There is an increasing loss of salt-marsh in much of the Solent for reasons unknown, and this needs to be investigated.

Invasive species

The highest risk pathways through which marine INNS are introduced and then spread have been identified as: commercial shipping (through release of ballast water, and biofouling on hulls); recreational boating (through biofouling on hulls); aquaculture (through contamination of imported or moved stock - or escaped stock in the case of the pacific oyster), and natural dispersal.

Biological resource use

Gull egg collecting occurs in some places, and wildfowling occurs in several places. These activities are likely to be disturbing to breeding and wintering birds even though they are licenced/consented at the moment.

Inappropriate pest control

Predator control is decreasing, resulting in increased predation by foxes etc. and this is the likely cause of decrease in successful breeding of gulls and terns.

Direct impact from 3rd party

Military helicopters cause disturbance to wintering birds.

⁷⁸ Addressing the needs of housing growth and protecting the marine environment in the Solent area, Environment Agency and Natural England, 2015.

Other

SPA boundaries may not cover the extent of all Annex 1 and Annex 2 features and/or supporting habitats.

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.

Solent and Southampton Water Ramsar site

Site area: 5346.44 ha

Overview of site and its location

The area covered extends from Hurst Spit to Gilkicker Point along the south coast of Hampshire and along the north coast of the Isle of Wight. The site comprises of estuaries and adjacent coastal habitats including intertidal flats, saline lagoons, shingle beaches, saltmarsh, reedbeds, damp woodland, and grazing marsh. The diversity of habitats support internationally important numbers of wintering waterfowl, important breeding gull and tern populations and an important assemblage of rare invertebrates and plants.

Qualifying Features

Criterion 1: The site is one of the few major sheltered channels between a substantial island and mainland in European waters, exhibiting an unusual strong double tidal flow and has long periods of slack water at high and low tide. It includes many wetland habitats characteristic of the biogeographic region: saline lagoons, saltmarshes, estuaries, intertidal flats, shallow coastal waters, grazing marshes, reedbeds, coastal woodland and rocky boulder reefs.

Criterion 2: The site supports an important assemblage of rare plants and invertebrates. At least 33 British Red Data Book invertebrates and at least eight British Red Data Book plants are represented on site.

Criterion 5: Assemblages of international importance

- Species with peak counts in winter: 51343 waterfowl (5 year peak mean 1998/99-2002/2003)

Criterion 6: Species/populations occurring at levels of international importance.

Qualifying Species/populations (as identified at designation):

- Species with peak counts in spring/autumn: Ringed plover *Charadrius hiaticula*
- Species with peak counts in winter: Dark-bellied brent goose *Branta bernicla bernicla*, Eurasian teal *Anas crecca*, Black-tailed godwit *Limosa limosa islandica*

Pressures and threats

Erosion

No information available.

Conservation objectives

None available.

Appendix 2

Evidence on recreation pressure in the New Forest

New Forest Visitor Research⁷⁹

Introduction

The Countryside Agency commissioned Tourism South East to undertake a programme of research in 2004-05 to identify the profile of visitors to the New Forest National Park; explore the characteristics of visits; identify the main reasons for visiting; identify access points used, routes taken and activities pursued; and produce estimates of visitor volumes and their economic impact. Although not aimed at identifying potential recreation pressure on biodiversity sites, the study is useful in characterising the scale and pattern of visitors to the New Forest National Park as a whole and is a key source of data for other studies reviewed below, including the PROGRESS Project⁸⁰ and the Footprint Ecology study on changing patterns of visitor numbers within the National Park⁸¹. NFNPA confirmed that there is no visitor survey work that only covers the New Forest European sites.

The two main methods of collecting primary data were:

- A site-based interview and observation survey at 62 locations within the National Park over a 12 month period, to provide a broad spread of users and recreation sites.
- A household telephone interview survey, targeting 2,164 households within the National Park boundary and adjacent areas.

The results of the household survey were broken down into three geographic categories:

- Households within the National Park.
- Households in an area bordering the National Park, within approximately 5 miles (8km) of the Park boundary.
- Households from more distant major urban catchments, including Southampton, Bournemouth and Salisbury.

The study results outlined below relate to the telephone survey of households within the National Park since these provide the best indication of the likely behaviour of occupiers of the residential development proposed by NFNPA's Local Plan.

Household survey results

98% of households in the National Park had a member who had visited it for recreation in the past 12 months, with 93% visiting at least once a month, and 78% visiting at least weekly.

Recreational visits are spread fairly uniformly across the year, with only a small bias towards the Spring and Summer seasons.

The main reasons for householders visiting the National Park were to walk (51%, of whom more than half walk for more than one hour), walk the dog (26%), or go horse-riding (5%).

The places most frequently cited by households located in the National Park as being one of their top three destinations in the New Forest were Lyndhurst (24%), Brockenhurst (19%), Beaulieu (13%) and Lymington (13%).

When planning their visit to the New Forest, households in the National Park rely heavily on local knowledge (57%) or feel no need to use an information source (21%), reducing the need for other sources such as maps (26%), guide books (11%), a visitor information centre (4%) or the internet (2%).

The most commonly cited usual modes of transport for households in the National Park to visit the New Forest for recreation are by car (64%) or walking (28%). The choice of transport mode is influenced mainly by convenience (51%) and ease of access (25%).

⁷⁹ Tourism South East (2005) Visitor Survey of the New Forest National Park 2004-2005

⁸⁰ Gallagher, Kate; Graham, Michael; Colas, Sarah (2007) PROGRESS Project Handbook

⁸¹ Sharp, J; Lowen, J; Liley, D (2008) Changing patterns of visitor numbers within the New Forest National Park

Implications for mitigation of recreation pressure

The survey results show that there is a high probability that new householders in the National Park will regularly visit the National Park by car or on foot for recreation, to walk with or without a dog for a considerable amount of time, and that their choice of where to visit within the National Park will rely heavily on their own/local knowledge. This suggests that measures such as reducing vehicle access, reducing car parking spaces, regulating verge parking, and enforcing parking restrictions (for example during sensitive breeding seasons) may be more effective than visitor education when it comes to influencing choice of recreation destination within the National Park. The success of such access management in reducing disturbance at New Forest European sites could be limited, however, by the long distances walked by recreational visitors. Education and warden supervision may therefore still play an important role in regulating visitor behaviour so as to reduce potential adverse effects on designated biodiversity assets. The fact that choice of transport mode is heavily influenced by convenience and ease of access suggests that SANGS which are close to residential development or which are well served by public transport may also be successful in diverting recreation visits from New Forest European sites.

PROGRESS Project⁸²

Promotion and Guidance for Recreation on Ecologically Sensitive Sites (PROGRESS) was a four year, EU-funded, project. It examined how the needs of conservation and recreation could be reconciled in the New Forest National Park and the Forest of Fontainebleau near Paris, both of which have seen a significant increase in visitor numbers in recent decades, with visible effects on their ecology.

The project's approach was to draw on expert knowledge and extensive surveys (including the visitor survey⁸³ reviewed above) and studies to create a clear picture of the problems to be tackled, to develop and implement a series of community and on-site actions and to develop partnerships with local tourism providers to promote key conservation messages. Although surveys and actions aimed at mitigating recreational disturbance in the New Forest were not limited to the SPA, project objectives included:

- *"To evolve partnerships that secure sustainable recreation in Natura 2000 sites."*
- *"To enhance visitor/user appreciation of, and greater personal responsibility for, the conservation of natural resources and the specific needs of the two Natura 2000 sites (including targeting users' lack of knowledge)."*

Information gathered by this project about outdoor recreation in the New Forest National Park formed a fundamental part of the evidence for the first Footprint Ecology study⁸⁴; the elements of most relevance to this report are reviewed under that study.

Actions implemented in the New Forest National Park by the Forestry Commission as part of this project which are of particular relevance to mitigating recreational disturbance included:

- Trial closure of selected car parks during March-June to limit recreational access to ground nesting bird sites.
- Permanent closure of a number of lay-bys to limit access to sensitive sites.
- Improving three large fenced off areas of the New Forest ('inclosures') to increase their attractiveness for recreational use by, for example, thinning trees, installing picnic areas and improving accessibility to disabled users and horse riders, to relieve pressure on sensitive areas.
- Making plans to upgrade existing car parks at locations capable of coping with additional visitors.
- Placing information boards in and around car parks located close to sensitive ground nesting bird breeding grounds which encourage visitors to stay out of these areas.

⁸² Gallagher, Kate; Graham, Michael; Colas, Sarah (2007) PROGRESS Project Handbook

⁸³ Tourism South East (2005) Visitor Survey of the New Forest National Park 2004-2005

⁸⁴ Sharp, J; Lowen, J; Liley, D (2008) Changing patterns of visitor numbers within the New Forest National Park

Implications for mitigation of recreation pressure

In commenting on work carried out through PROGRESS to manage the impact of recreation within the New Forest, the report states that it is too early to say whether measures such as seasonal car park closures have produced more favourable breeding habitat for birds or led to increased bird numbers, although the RSPB and Forestry Commission planned to monitor this. Similarly, the success of measures designed to relieve visitor pressure on the SPA by offering alternative recreational facilities beyond its boundaries, such as at Watchmoor Wood, was unknown at the time of the report.

Monitoring the effectiveness of access management in the New Forest⁸⁵

The Forestry Commission has carried out bird surveys in areas of New Forest National Park surrounding eight car parks that have undergone seasonal closures each year from 2006 to 2011. As described under the review of the PROGRESS Project (above), these trial car park closures form part of a suite of access management measures undertaken to test their effectiveness in mitigating recreational disturbance on breeding birds in the New Forest. LUC obtained and briefly reviewed copies of the annual survey reports. These reveal that the following wader species were surveyed during the breeding season (March-June): Northern Lapwing, Common Snipe, Eurasian Curlew and Common Redshank. These species were chosen because *"The valley mires and the wetter heathlands have long been recognised as valuable habitats for waders breeding in the New Forest"*.

Implications for mitigation of recreation pressure

Since the species chosen are not Annex I bird species for which the New Forest SPA is designated, this monitoring work is of limited use in assessing the likely effectiveness of seasonal car park closures as a tool for mitigating recreational disturbance on the New Forest SPA. In any event, the survey data do not reveal any definitive trends over the period of car park closures, with bird population numbers fluctuating from year to year. This means that the study cannot help to inform strategies for mitigating recreational disturbance in the New Forest European sites and no better evidence from the New Forest is thought to exist.

Changing patterns of visitor numbers within the New Forest National Park⁸⁶

Introduction

This study has two main strands. Firstly, it explores whether current visitor levels to the New Forest are having a detrimental effect on three Annex 1 heathland bird species (nightjar, woodlark and Dartford warbler). These species are used as indicators of the wider health of the National Park's designated interest since research in other areas of southern England has shown that they are sensitive to human disturbance. This strand is explored by reference to Forestry Commission visitor count data from 2004 and 2005 and national bird surveys from 2004 and 2006.

Secondly, the study models the change in visitor patterns to the Park that can be expected as a result of housing development. This is done by reference to visitor data (largely from the PROGRESS research), the current distribution of housing in distance bands around the New Forest boundary and levels of housing growth provided for each district in the South East and South West Regional Spatial Strategies (RSS)⁸⁷. The report ends by making recommendations on monitoring, refinement of visitor models and visitor management options.

⁸⁵ Wiseman, E (2011) - PROGRESS Project

⁸⁶ Sharp, J; Lowen, J; Liley, D (2008) Changing patterns of visitor numbers within the New Forest National Park

⁸⁷ Both revoked in 2013 except for Policy NRM6 of the South East RSS: Thames Basin Heaths Special Protection Area

Existing visitor patterns

This study drew its visitor pattern information largely from the New Forest Visitor Survey⁸⁸ conducted as part of the PROGRESS Project. That visitor survey and the most relevant data from it are reviewed separately above and have not been reproduced here.

Evidence for existing disturbance impacts to Annex 1 birds

The modelling failed to find a statistically significant impact from visitor pressure on any of the three indicator bird species studied. The study notes that given this finding and the fact that densities of the indicator Annex I bird species are markedly lower in the New Forest than in similar habitats such as the Dorset Heaths and Thames Basin Heaths, further work is needed to understand these comparatively low densities. There is some evidence that two of the species (nightjar and Dartford warbler) avoid areas of suitable habitat where predicted visitor numbers are very high but this avoidance is not enough to account for the low overall densities. The overarching conclusion is that in the absence of further work it is difficult to determine the extent to which disturbance may have consequences for Annex I bird populations.

Current distribution of housing, likely change and consequences of housing growth for visitor patterns

Based on residential address data, population densities in the New Forest are estimated to be high to the east of the National Park (1,000-2,000 people per km²), fairly high to the west and south west of the Park (500-1,000 people per km²) and low to the north of the Park and within it (0-100 people per km²).

The study estimates that development during 2006-2026 within 50 km of the New Forest National Park (but outside its boundary) will result in an additional 1.05 million visitor days per annum, an increase of 7.9%. It estimates that the bulk of these new visitors (85%) associated with housing development in the South East and South West regions will live within 20 km, and particularly 7 km, of the Park and based on existing visitor patterns, they are likely to visit more frequently than visitors from further afield, visit throughout the year, and be more likely to be dog-walkers and rely on local knowledge to plan their visits.

In reflecting on the accuracy of its predictions, the study notes that although it assumes that the number of residents per dwelling will remain constant into the future, current trends actually show a general decline in household size across the South East. This could result in the study over-estimating visitor growth but this could be offset by increases in the average age of the regional population, since older age groups are more likely to be day-visitors to the Park.

Even in the absence of evidence of significant existing recreation pressure on Annex I birds, the predicted scale of increase in visitor numbers (particularly local day-visitors who are more likely to be dog walkers and to stray of the beaten track) combined with uncertainty over the reasons for current low densities of birds leads the study to conclude that *"it would seem necessary that a package of mitigation measures is implemented to ensure no adverse effects"*.

Implications for mitigation of recreation pressure

The study emphasises the need to tailor a package of mitigation measures to the unique nature of the New Forest and its visitor patterns (see above) but also points out that the large area of land, existing expertise in access management, and an infrastructure already geared to cope with large numbers of visitors provide a good starting point. Suggested mitigation measures comprise:

- A monitoring strategy – detailed field work to understand low densities of the three indicator species; regular monitoring of other key species and locations where there are concerns about recreational pressure; annual monitoring of visitor levels; monitoring of changes in visitor patterns associated with access management measures.
- Refinement of visitor models – accounting for the spatial distribution of paths and points of interest within the New Forest; incorporating actual route data; exploring the spatial distribution of other species to predicted visitor pressure.

⁸⁸ Tourism South East (2005) Visitor Survey of the New Forest National Park 2004-2005

- Car-parking – managing car parking to re-distribute visitors.
- Access management measures - promotion of less sensitive areas to visitors; provision of interpretation and path enhancement in less sensitive areas; promotion of issues such as the need to keep dogs on leads.
- Alternative green space – the report states that any alternative green space must be very carefully considered in terms of its ability to attract people who would otherwise visit the New Forest. It notes the lack of long term visitor monitoring at green spaces provided as a means of reducing visitor pressure on sites of nature conservation importance elsewhere and cites a Portsmouth recreation survey which suggested that neither country parks nor tourist attractions are regarded as alternatives to visiting the New Forest. It concludes that the visitors who are likely to be the easiest to divert from the New Forest are those who do not stay overnight and that potential alternative green spaces need to be located closer to development areas than the sensitive site to be protected and might be found within parts of the New Forest that currently have no public access. These would need to be located in area of low sensitivity to disturbance. Sites to attract dog walkers should provide safe off-road parking, a range of routes, and be in locations perceived to maximise enjoyment of the dog.

Urban development and the New Forest SPA⁸⁹

Introduction

This report considers the evidence of impacts from urban development on the designated European interest features in the New Forest SPA, whether measures are necessary to avoid likely significant effects and, if so, the measures that might be required. It draws on existing bird survey data for the three indicator species studied in the earlier Footprint Ecology report⁹⁰ as well as new interviews with New Forest management and conservation experts.

Views of interviewees

The expert interviews revealed the following views:

- New housing has led to increased numbers of people accessing the New Forest SPA, thereby increasing the potential for habitat damage and species disturbance.
- Access levels have increased over time, particularly cycling, horse riding, dog walking and organised events.
- Many recreational visits originate from close to the SPA (i.e. from within or just outside the National Park), with a particular increase over the past 30 years in people travelling by car for daily dog walks.
- Impacts of recreation are not focused around the New Forest's settlements because of the significant proportion of non-local visitors and because even locals tend to travel a short distance by car rather than walking from their front door; it was therefore thought unlikely that the distribution of birds would show any correlation with housing locations.
- Managing access by local visitors is harder than access by tourists as they are less likely to respond to signs or seek guidance on where to go and what to do.
- Habitat management has changed over time, habitat quality is patchy and bird data are incomplete and sometimes inconsistent, making it harder to isolate the effects of development on bird populations.

Results of bird surveys and relationship to housing locations

Survey data for three Annex I bird species (Dartford warbler, nightjar and woodlark) were examined in relation to information about the distribution of their habitats, differences in management of those

⁸⁹ Fearnley, H; Hoskin, R; Liley, D (2012) Urban Development and the New Forest SPA

⁹⁰ Sharp, J; Lowen, J; Liley, D (2008) Changing patterns of visitor numbers within the New Forest National Park

habitats and proximity of habitat areas to existing built development. The findings, which need to be interpreted with caution because of the patchy coverage of bird survey data, indicate that:

- The majority of the suitable (dry heathland) habitat for the Annex I bird species lies within 1 km of existing housing.
- No clear relationship existed between bird population density and habitat management for woodlark or nightjar; areas where winter burning is used as a heathland management tool support lower densities of Dartford warbler for seven years following burning.
- There is no evidence that the current distribution of birds is related to the current distribution of housing.

Summary and interpretation of results

The comparatively low densities of Annex I bird species within the New Forest SPA were flagged up by the earlier Footprint Ecology study⁹¹. This study sought to explain these by examining the potential effects of habitat management (particularly annual burning) and of recreational disturbance but was unable to provide such an explanation. The study concluded that existing data sets on birds and on habitat management are not adequate to determine why densities are low.

The report points out that most of the SPA's dry heath habitat is in relatively close proximity to housing, bringing nesting habitat and recreation together in the same locations. In the absence of any other explanation for the SPA's low densities of Annex I bird species, the study concludes that it is reasonable to suppose that the low densities may, at least in part, be due to recreation pressure. Although other factors, such as variations in habitat quality and habitat management, are likely to be contributing to low bird densities application of the precautionary principle is advised in line with the requirements of the Habitats Regulations until the evidence base is refined.

Implications for mitigation of recreation pressure

The argument above leads the report authors to conclude that the NPA should seek measures to mitigate the potentially significant recreational effects of development. Since recreational disturbance has multiple sources (visitors from within the National Park, day visitors from beyond the Park and overnight tourists from further afield) the NPA is advised to work with partners to seek proportionate contributions to mitigation measures from each source.

In discussing potential mitigation measures, the report finds little merit in establishing a development exclusion buffer zone around the New Forest's existing settlements such as the 400 m zone used for other heathland SPAs in southern England. This reflects, in part, the particular travel patterns of the New Forest's recreational users, as previously discussed. Instead, the report recommends that resources are pooled into a strategic mitigation scheme focused on people management and designed to complement the National Park's existing Recreation Management Strategy. Recommended elements of mitigation include:

- A survey of all parking locations within the National Park to inform management options.
- Heightened ranger presence at key locations during March-August to ensure responsible access.
- Promotion of routes for local residents away from sensitive areas, particularly during the bird breeding season.
- Management of pathways to influence visitor use.
- Community work to communicate issues to local residents.
- Reduction of disturbance around honey buzzard nest sites, for example by providing dedicated bird watching points.
- Further research to identify the factors determining distribution and abundance of Annex I bird species in the New Forest.

⁹¹ Sharp, J; Lowen, J; Liley, D (2008) Changing patterns of visitor numbers within the New Forest National Park

Biodiversity in the New Forest⁹²

Introduction

This book has a large number of contributors and provides an overview of biodiversity in the New Forest, focusing on the current status and trends in species of conservation concern, and the habitats with which they are associated. A brief overview is also provided of current management approaches and future challenges. LUC has reviewed Chapter 20 which integrates this information to identify cross-cutting issues with the aim of informing future management decisions.

Evidence of recreational disturbance

Natural England's Common Standards Monitoring (CSM) approach has formed the basis of habitat monitoring in the New Forest since about the year 2000. Results indicate that 463 units out of 576 are in unfavourable condition (including 366 unfavourable recovering, 75 declining, 20 no change, and 1 partially and 1 totally destroyed); this represents 80% of units, or 68% of the total area. For those units for which data are available, the reasons for the condition being unfavourable provide an insight into the main threats currently affecting New Forest habitats. Results indicate that the threats differ between habitat types. In dry heathland and grassland habitats, the principal threat is overgrazing, although inappropriate scrub control is also a significant factor. In wet heathland, wet grassland and mire habitats, the principal threat is drainage. In woodland habitats, inappropriate forestry or woodland management practices are the principal threat, although drainage is also a significant factor accounting for unfavourable condition. In none of the habitats is public access or disturbance cited as a significant factor. For dry heathland and dry grassland habitat classified as in unfavourable condition, for instance, public access/disturbance was only cited as a reason for this condition in 0.72% of the area, with other reasons such as overgrazing (39.7%) and inappropriate scrub control (34.2%) far more commonly cited. These observations need to be treated with some caution since factors other than disturbance may temporarily cause designated bird species to avoid otherwise suitable areas of habitat; as these factors are addressed and habitat condition improves, recreational disturbance may become apparent. A good monitoring protocol is needed to identify such situations.

Species monitoring is more patchy than habitat monitoring, with a number of authors in the book highlighting a lack of systematic survey and monitoring data, making it difficult to ascertain trends in abundance of individual species or species groups with any precision. Available evidence does suggest, however, that at least 170 species have been lost from the New Forest in recent decades. Again, a range of different causes of the decline or loss of species is identified. The widespread damage to ancient woodland habitats caused by forestry operations in the 20th century appears to have had a significant negative impact on groups such as vascular plants, fungi and some invertebrates. Another key issue has been the increase in grazing and browsing pressure in recent decades, particularly in the Inclosures, which accounts for the losses of many invertebrates, especially the Lepidoptera. In common with the assessment of habitat condition (see above), inappropriate habitat management interventions are widely cited, including scrub control, tree felling and heathland burning. The study also notes that the loss or decline of some species may be the result of processes occurring in the wider countryside, including agricultural intensification and land use change in areas adjacent to the New Forest. Causes for declines in bird species such as Dartford warbler, snipe, curlew and redshank are described as 'often unclear' and disturbance from human recreation is mentioned only as one of a range of factors which also includes inappropriate habitat management, climate change and nest predation.

Although there is overlap between the designated features of the New Forest's SSSIs and its European sites, it must be remembered that Natural England's condition assessments relate to SSSIs and caution should therefore be exercised in applying the conclusions above to the state of the habitats and populations of the European designations and the impact of recreational disturbance on these.

The book points out that that effective conservation management depends on adequate monitoring, so that management interventions can be amended and adapted in response to available evidence. Despite this, the current distribution of most species in the New Forest is inadequately known, and even less

⁹² Newton, Adrian C (2010) 'Chapter 20. Synthesis: status and trends of biodiversity in the New Forest' in Newton, Adrian C (editor) Biodiversity in the New Forest

information is available regarding trends in abundance of individual species, even for those of international conservation concern for which the area was designated.

The conclusion in respect of recreation pressure is that *"Although there are clearly areas of concern in terms of recreation impacts on biodiversity, such as possible disturbance to ground-nesting birds, there is also a great deal of uncertainty regarding what the precise impacts actually are. Such uncertainty can only be addressed by an increased emphasis on research and monitoring in future."*

Implications for mitigation of recreation pressure

The book does not seek to provide a detailed evaluation of management approaches to conservation management of the New Forest but some cross-cutting issues are briefly considered. The section on recreation notes that much of the evidence of recreational disturbance to wildlife is circumstantial, reports the findings of the PROGRESS project (reviewed separately in this report), and lends support to the New Forest NPA's Recreation Management Strategy. It concludes that *"it is surely appropriate that recreation management should continue to form a central element of any management plan for the New Forest"* whilst noting that restrictions on visitor movements or activities will inevitably be controversial, underlining the need for robust evidence to be gathered to support them. Whilst this conclusion of the study is valid in general terms, in the context of the Habitats Regulations, implementation of such restrictions may be justified even in the absence of robust evidence, on a precautionary basis.

Appendix 3

Review of other relevant plans and projects

District level Local Plans (strategic issues / 'core strategies') providing for development

Bournemouth Local Plan: Core Strategy	
Plan Owner/ Competent Authority:	Bournemouth Borough Council
Related HRA/AA:	Pre-Submission Consultation Document Habitats Regulations Assessment Report (July 2011) ⁹³ Sustainability Appraisal and Habitats and Regulations Assessment: Supplementary Statement based on Proposed Main Modifications (May 2012) ⁹⁴
Notes on Plan documents:	Core Strategy (adopted October 2012)
<p>Conclusions on potential effects of relevance to European sites within scope of HRA of New Forest Local Plans</p> <p>Overall the HRA concluded that there would be no adverse effects on the integrity of any European sites resulting from the Bournemouth Plan either alone or in combination with other plans or projects.</p> <p>The supporting statement on the proposed modifications also concluded that there would be no likely significant effects on European sites resulting from proposed modifications.</p> <p>The HRA identifies the following potential risks to European sites:</p> <p>Physical loss of habitat: Potential adverse effects on the Dorset Heathlands SPA/ Ramsar Site were identified from physical loss of habitat on development sites whose locations are unknown. HRA concludes these effects are ruled out by CS31: Heathland.</p> <p>Pressure on recreation space: Potential adverse effects on Dorset Heathlands SPA/Ramsar complex were identified due to potential for increased pressure on amenity space. These effects were ruled on due to a separate study forecasting lower visitor pressure in inland areas (where heathlands are located), implementation of policies within CS31, CS29 CS33, as well as mitigation measures within the Heathland Planning Framework. Potential adverse effects on the River Avon SAC/Avon Valley SPA and Ramsar site were also identified from in combination effects with neighbouring authority plans. However, these effects were ruled out due mitigation measures in other Core Strategies.</p> <p>Air Pollution: Potential adverse effects on the Dorset Heaths SAC and Dorset Heathlands SPA/Ramsar were identified due to a positive trend of NOx emissions in some parts of the heaths. However these effects where ruled out by the HRA as implementation of mitigation measures outlined in the LTP3 should ensure adverse effects on the integrity of the Dorset Heathlands SPA/Ramsar and SAC are avoided.</p> <p>Noise pollution: Potential adverse effects were identified for the Dorset Heathlands SPA/Ramsar site from noise caused by new development on development sites whose location are currently unknown, as well as noise generated from vehicle traffic. These effects are ruled out due to policy CS12, CS14, CS35 and mitigation measures set out in LTP3.</p> <p>Light pollution: Potential adverse effects on the Dorset Heathlands SPA/Ramsar Site were identified due to potential light pollution from development on sites whose locations are currently unknown. These effects are ruled out due to policy CS31 which requires mitigation measures where adverse impacts are unavoidable.</p> <p>In combination effects: HRA concludes that there are unlikely to be adverse effects on European Sites as long as mitigation measures set out in the Bournemouth Core Strategy, Christchurch and East Dorset Core Strategy (2010) and the Bournemouth, Dorset and Poole LTP3 are implemented.</p>	

Christchurch and East Dorset Joint Core Strategy	
Plan Owner/ Competent	Christchurch Borough Council and East Dorset District Council

⁹³ Land Use Consultants (2011). Bournemouth Core Strategy Pre-Submission Consultation Document: Habitats Regulations Assessment Report.

⁹⁴ Bournemouth Borough Council (2012). Sustainability Appraisal and Habitats Regulations Assessment: Supplementary Statement on Proposed Main Modifications. [online] Available at: <https://www.bournemouth.gov.uk/planningbuilding/PlanningPolicy/PlanningPolicyFiles/H24-Supplementary-Statement-SA-and-HRA.pdf> [Accessed 11 Aug. 2017].

Christchurch and East Dorset Joint Core Strategy

Authority:	
Related HRA/AA:	Christchurch and East Dorset Joint Core Strategy Habitats Regulations Assessment
Notes on Plan documents:	Plan adopted April 2014. Development provided for include 8,490 new homes and 80 ha of employment land between 2013 and 2028.

Conclusions on potential effects of relevance to European sites within scope of HRA of New Forest Local Plans

The HRA Appropriate Assessment ruled out any adverse effects on European sites. The following types of potential likely significant effect were identified:

Habitat loss: *Policy KS9 and KS10*: There was an element of uncertainty at the screening stage, in regards to these policies and whether proposed development and inclusion of cycle and walking routes would result in habitat loss at Dorset Heath SAC, Dorset Heathlands SPA/Ramsar, River Avon SAC, and Avon Valley SPA/Ramsar. It is recommended that habitat loss does not occur from proposals and if that is unavoidable then appropriate compensation should be implemented.

Physical disturbance/damage: *Policy CN3*: proposes development directly adjacent to the Avon SPA/Ramsar and within close proximity to the Avon Valley SPA/Ramsar, Dorset Heaths SAC and Dorset Heathlands SPA/Ramsar are likely to result on significant effects, as a result of recreational pressure. Equally, *Policy KS10*: proposes improvements to the A35, which could have an adverse impact on the River Avon SAC and Avon Valley SPA/Ramsar, due to physical disturbance and damage. Policies relating to gypsy and traveller sites and rural exception sites also have the potential to cause significant adverse impacts as a result of development within 500m of the Dorset Heaths SAC, Dorset Heathlands SPA/Ramsar site, River Avon SAC and/or Avon Valley SPA/Ramsar site. It has been concluded that there will be no significant impacts to the European sites, as long as mitigation proposed in *Policies ME1 and ME2*.

Recreational disturbance: *Policy CN3*: the close proximity of proposed development to Dorset Heaths SAC, Dorset Heathlands SPA/Ramsar site, the River Avon SAC, Avon Valley SPA/Ramsar site and the New Forest SAC/SPA/Ramsar were considered to have adverse effects, in regards to increased visitor pressure. The provision of mitigation from *Policies ME1, ME2 and ME3* was considered adequate in preventing adverse effects on the European sites.

Noise, vibration and light pollution: New Forest SAC/SPA/Ramsar site, Dorset Heathlands SPA and Avon Valley SPA/Ramsar site are all vulnerable to significant adverse effects. However, the provision of mitigation from *Policies ME1 and ME2* can rule out any significant effects on European sites.

Air pollutions: Dorset Heaths SAC, Dorset Heathlands SPA/Ramsar site, the River Avon SAC, Avon Valley SPA/Ramsar site and the New Forest SAC/SPA/Ramsar site were considered to be affected by likely significant effects. It was concluded that it was unlikely for there to be significant adverse effects, as long as appropriate mitigation was implemented.

In combination plans: It is concluded that there will be no adverse effects on European sites, including Dorset Heaths SAC and Dorset Heathlands SPA/Ramsar site if recommendations made within the HRA are implemented.

Isle of Wight Island Plan Core Strategy

Plan Owner/ Competent Authority:	Isle of Wight Council
Related HRA/AA:	Habitats Regulation Assessment for the Isle of Wight Core Strategy Appropriate Assessment Report April 2011 ⁹⁵
Notes on Plan documents:	Plan adopted March 2012. Development provided for include 8320 dwellings and 42 ha of new economic development land between 2011 and 2027.

Conclusions on potential effects of relevance to European sites within scope of HRA of New Forest Local Plans

The HRA concluded that there would be no likely significant effects as a result of strategic-level Core Strategy policies.

Further assessment will be required when identifying site allocations for Area Action Plan DPDs. For example *AAP1: Medina Valley and AAP2: Ryde* both have the potential to cause likely significant effects to the Solent and Southampton Waters SPA, as a result of recreational disturbance from increased visitor pressure. To further understand the impacts project level HRA's will be required for each site allocation.

⁹⁵ <https://www.iwight.com/azservices/documents/2782-FA4-HRA-of-the-IW-Core-Strategy-Appropriate-Assessment-Report.pdf>

Isle of Wight Island Plan Core Strategy

Further work is also necessary to provide evidence that appropriate mitigation will be delivered from the GI strategy. This strategy, along with Council's Open Space, Sport and Recreation Audit will be able to identify more spaces for recreation.

The HRA assessment has also recommended that certain housing development site allocations are not progressed due to adverse impacts on European sites.

New Forest District Council Core Strategy

Plan Owner/ Competent Authority:	New Forest District Council
Related HRA/AA:	Habitats Regulations Assessment Screening Statement and Appropriate Assessment for New Forest District Council Core Strategy - Submission document (September 2008)
Notes on Plan documents:	Core Strategy provides during 2006-2026 for a minimum of 3,920 new dwellings, mainly in the defined towns and villages, plus up to 850 additional dwellings in extensions to the towns and larger villages where these provide an exceptional contribution towards addressing identified local affordable and low cost market housing needs; 15 hectares of new employment sites adjoining Totton, New Milton, and Ringwood (adopted October 2009)

Conclusions on potential effects of relevance to European sites within scope of HRA of New Forest Local Plans

The HRA Screening ruled out likely significant effects on European sites except in relation to recreation effects. In several avoidance of in combination effects required the delivery of mitigation such as open space/Green Infrastructure or transport improvements to air quality through policies within the plan itself or partnership strategies. NFDC acknowledged HRA recommendations such as mitigation in its Core Strategy and adopted policies which commit it to the necessary partnerships for effective delivery. It was considered that policies in place would enable delivery of measures necessary to mitigate any adverse effects.

HRA Screening was unable to rule out significant effects on New Forest SAC, SPA and Ramsar sites as a result of an increase in recreational visits from housing growth, particularly in combination with other growth in the South of England, and an Appropriate Assessment was therefore carried out. This was able to rule out adverse effects on integrity by reliance on the following mitigation, to be implemented through the Core Strategy and subsequent Development Plan Documents:

- adequate protection of international sites from all direct and indirect effects of development, which would allow control of development if adverse effects were identified in the future, with particular reference to in combination effects of visitor pressure;
- promotion of the role of green infrastructure and commitment to resourcing its delivery across a wide area (e.g. the PUSH area) to reduce in combination effects (i.e. provision of new country parks or other informal open space attractions);
- appropriate levels of open space provision within new development and addressing shortfalls in existing provision. In particular for development areas close to the sites, measures to improve open space to avoid regular day visits such as dog walkers;
- management of the sites to address additional recreational pressures and the ability to secure resources from new development to contribute to this where necessary;
- measures to establish a partnership monitoring strategy for the interest features of the sites to inform management measures and trigger additional mitigation if required;
- commitment to active partnership working with key stakeholders in the region to deliver the necessary open space, green infrastructure and site access management measures.

Poole Site Specific Allocations and Development Management Policies

Plan Owner/ Competent Authority:	Borough of Poole
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Poole Site Specific Allocations and Development Management Policies

Related HRA/AA:	Poole Site Specific Allocations and Development Management Policies Sustainability Appraisal including HRA Screening (July 2011) ⁹⁶
Notes on Plan documents:	The Poole Local Plan, once completed, will set a new plan for Poole to meet needs and guide development to 2033

Conclusions on potential effects of relevance to European sites within scope of HRA of New Forest Local Plans

The SA (including HRA Screening) concluded that screening did not identify any significant adverse impacts on European sites that could not be resolved through the application of appropriate avoidance measures taken forward to Submission.

Potential adverse effects were identified at the following sites at Appropriate Assessment stage:

Policy SSA 16 Talbot Village – Houses in Multiple Occupation: SA identifies potential recreational disturbance from proposed residential housing. However, Appropriate Assessment concluded the likely adverse effect on Dorset Heathlands SPA to be minimal given the limited number for HMO properties in Talbot Village.

Policy SSA 19 Bourne House, Langside Avenue: Although within close proximity to the Dorset Heathland SPA/Ramsar, HRA concluded that the nature of development would not have an adverse impact on SPA/Ramsar.

Policy SSA 20 Wallisdown Road: Land to the south of Wallisdown Road is located in the Dorset Heathlands SPA Ramsar site. However, HRA concluded that mitigation measures put in place would result in no adverse impacts on the SPA/Ramsar.

Policy SSA 21 Facilities for Park and Ride: Site identified as having potential adverse effects on the Dorset Heathlands SPA. However, Appropriate Assessment deemed it would not result in any potential adverse impacts on designated sites.

Poole Local Plan Pre submission draft 2017

Plan Owner/Competent Authority:	Borough of Poole
Related HRA/AA:	Poole Local Plan Submission Stage Habitats Regulations Assessment (2017) ⁹⁷
Notes on Plan documents:	The Poole Local Plan, once completed, will set a new plan for Poole to meet needs and guide development to 2033

Conclusions on potential effects of relevance to European sites within scope of HRA of New Forest Local Plans

At Appropriate Assessment stage, the HRA could not rule out the following significant effects:

Recreation: HRA concluded that it is not possible to rule out adverse effects on the integrity of Dorset Heathlands SPA, SAC and Ramsar site owing to absence of housing phasing and work to secure further SANGs. Both phasing of housing and a review of SANGs is recommended.

Habitat loss/interference: HRA concludes that the plan could have significant adverse effects on the Dorset Heathlands SPA due to direct loss of foraging habitat for Nightjars. The HRA recommends that the local plan to recognise the importance of this issue and protect critical habitat corridors.

Air Quality: HRA could not rule out adverse effects on Dorset Heathlands SPA and Ramsar Site owing to the general increase in traffic along existing routes as a result of new employment and housing development sites. It is recommended that the preparation of the Local Transport Plan and its HRA should include ensuring adequate protection for Dorset Heathlands.

Southampton Core Strategy Partial Review and City Centre Action Plan

Plan Owner/Competent Authority:	Southampton City Council
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⁹⁶ <http://www.poole.gov.uk/planning-and-buildings/planning/planning-policy/site-specific-allocations-and-development-management-policies/>

⁹⁷ Hoskin, R., Liley, D. & Underhill-Day, J. (2017). Habitat Regulations Assessment of the Poole Local Plan, Publication Stage

Southampton Core Strategy Partial Review and City Centre Action Plan	
Related HRA/AA:	Core Strategy Habitats Regulations Assessment Summary Report
Notes on Plan documents:	Plan adopted January 2010; partial review adopted March 2015. Development provided for includes 16,300 new homes, 110,000 sq m of office development and 97,000 sq m of industrial/warehouse development between 2006 and 2026.
Conclusions on potential effects of relevance to European sites within scope of HRA of New Forest Local Plans <p>The following likely significant effects were identified:</p> <p>Coastal Squeeze: this is likely to have a significant effect on the Solent and Southampton Water SPA/ Ramsar site and Solent Maritime SAC. The forthcoming North Solent Shoreline Management Plan is expected to be addressed and mitigate for the impacts of coastal squeeze.</p> <p>Recreational disturbance: an increase in visitor numbers could potentially cause significant impacts on Solent and Southampton Water SPA/ Ramsar site, Solent Maritime SAC and the New Forest SAC/SPA/Ramsar site. A Solent Disturbance and Mitigation Study will be undertaken to identify the potential impacts of recreation. Appropriate mitigation measures can be devised from this.</p> <p>Air pollution: could potentially cause significant impacts on Solent and Southampton Water SPA/ Ramsar site and Solent Maritime SAC and the New Forest SAC/SPA/Ramsar. There is potential for in combination effects with Draft South East Plan and Southampton Airport.</p> <p>Tall buildings and flight/view lines: there is potential for likely significant effects Solent and Southampton Water SPA/ Ramsar, however there is insufficient information to assess this.</p> <p>Increased effluent discharge: has potential likely significant impact on Solent and Southampton Water SPA/ Ramsar, Solent Maritime SAC, the New Forest SAC/ SPA/ Ramsar. There is potential for in combination effects with Draft South East Plan.</p> <p>Increased water demand: this could cause likely significant effects on Solent and Southampton Water SPA/ Ramsar, Solent Maritime SAC, the New Forest SAC/ SPA/ Ramsar. This is also considered to be an adverse effect of the Draft South East Plan.</p> <p>Noise/Light pollution: impacts are currently uncertain.</p>	

Test Valley Borough Revised Local Plan DPD 2011-2029	
Plan Owner/ Competent Authority:	Test Valley Borough Council
Related HRA/AA:	Revised Local Plan DPD 2011 – 2029 Regulation 22, July 2014 HRA Assessment for Revised Local Plan DPD, June 2014
Notes on Plan documents:	Plan adopted January 2016. Development provided for includes 10,584 new homes and allocation of 63,000 sq m of employment land between 2011 and 2029.
Conclusions on potential effects of relevance to European sites within scope of HRA of New Forest Local Plans <p>Recreational disturbance was identified as a likely potential threat to European designated sites. The policies relating to this include:</p> <ul style="list-style-type: none"> • <i>COM1 Housing Provision 2011 – 2029</i> • <i>COM3 New Neighbourhood at Whitenap, Romsey;</i> • <i>COM4 New Neighbourhood at Hoe Lane, North Baddesley</i> <p>These policies are likely to cause disturbance to species in the New Forest SPA/ Ramsar and Solent and Southampton Water SPA/ Ramsar through increased visitor numbers from new housing developments. <i>COM1</i> recognises the necessity to identify any impacts to European sites from any future development plans. The potential impacts of strategic allocations provided for by <i>COM3</i> and <i>COM4</i> are mitigated by the requirement within these policies to provide 8.0 Ha of alternative recreation space per 1,000 population at Beggarspath Wood and Luzborough Plantation. <i>Policy E5</i> requires developments to comply with the Habitats Regulations, including provision of measures to mitigate adverse effects; supporting text states that the Council will seek developer contributions towards a range of mitigation measures, including securing access to new areas of land for informal recreation. In this regard, the supporting text</p>	

Test Valley Borough Revised Local Plan DPD 2011-2029

also notes partnership work to mitigate recreational pressures on the New Forest and Solent European sites. In the short term, the Council has approved interim mitigation packages in respect of both of the New Forest⁹⁸ and Solent Coast⁹⁹. Potential in combination effects from the Test Valley Revised Local Plan are therefore considered to have been fully mitigated.

Wiltshire Core Strategy

Plan Owner/ Competent Authority:	Wiltshire Council
Related HRA/AA:	Wiltshire Core Strategy Updated Habitats Regulations Assessment ¹⁰⁰
Notes on Plan documents:	Plan adopted January 2015. Development provided for include at least 42,000 new homes and 178 ha of new employment land.

Conclusions on potential effects of relevance to European sites within scope of HRA of New Forest Local Plans

The following likely significant impacts in combination with other plans were identified:

Water abstraction and pollution: additional housing from policies CP2 – *Delivery Strategy*, CP4 – *Amesbury*, CP17 – *Mere*, CP24 – *Southern Wiltshire*, CP26 – *Tidsworth and Ludgershall* and CP31 – *Warminster* had the potential to contribute to likely significant impact. However, Wessex Water and Thames Water have confirmed that the increased housing numbers can be supplied within licensed abstraction headroom and sewage discharge accommodated for at the Sewage Treatment Works. It was concluded that there would be no adverse effect on the River Avon SAC

Recreation: proposed housing within the South Wiltshire CA was considered to marginally increase recreational pressure to the New Forest SAC. CP50: *Biodiversity and Geodiversity* and Recreational Management Strategy were found to be valid and effective.

Air pollution: there is potential for likely significant effects for any European designated site as a result of increased traffic. The existing mitigation described in CP55: *Air Quality* is considered valid and that it will remain effective.

County level plans providing for development

Hampshire Minerals and Waste Plan¹⁰¹

Plan Owner/ Competent Authority:	Hampshire County Council and its partner authorities, Southampton City Council, Portsmouth City Council, New Forest National Park Authority and South Downs National Park Authority
Related HRA/AA:	Hampshire Minerals & Waste Plan Assessment Under the Habitats Regulations, July 2013 ¹⁰²
Notes on Plan documents:	Adopted October 2013 The Minerals and Waste Local Plan replaces the Minerals and Waste Core Strategy and comprises of strategic approach and policies, strategic sites allocations considered necessary to deliver the Plan objectives and general and site-specific development management policies.

Conclusions on potential effects of relevance to European sites within scope of HRA of New Forest Local Plans

The HRA concludes that there are no likely significant effects on any European sites, as a result of Hampshire's proposed policies on their own and in combination with other plans, as long as recommended measures to avoid and

⁹⁸ New Forest Interim Mitigation Framework 2014 requires mitigation where there would be a net gain in dwellings within 13.6 km of New Forest SPA

⁹⁹ Requires mitigation where there would be a net gain in dwellings within 5.6 km of Solent and Southampton Water SPA

¹⁰⁰ <http://www.wiltshire.gov.uk/planninganddevelopment/planningpolicy/wiltshirecorestrategy/wiltshirecorestrategyexamination.htm>

¹⁰¹ <http://www3.hants.gov.uk/mineralsandwaste/planning-policy-home.htm>

¹⁰² <http://www3.hants.gov.uk/mineralsandwaste/planning-policy-home.htm>

Hampshire Minerals and Waste Plan¹⁰¹

mitigate are implemented.

Hampshire Local Transport Plan 2011-2031¹⁰³

Plan Owner/ Competent Authority:	Hampshire County Council
Related HRA/AA:	Habitats Regulations Assessment for the Hampshire Local Transport Plan 3, March 2011 ¹⁰⁴ : Screening Statement for Part A 20 Year Strategy
Notes on Plan documents:	<p>Approved February 2011</p> <p>Transport priorities for Hampshire are:</p> <ul style="list-style-type: none"> • Supporting the economy through resilient highways; • Management of traffic; • The role of public transport; • Quality of life and place; • Transport and growth areas.

Conclusions on potential effects of relevance to European sites within scope of HRA of New Forest Local Plans

The HRA considers it unlikely that the proposed LTP3 Strategy will generate significant effects at any European site included in the assessment, either alone or in combination with other plans and projects. A stage 2 Appropriate Assessment was not considered necessary.

Bournemouth, Dorset and Poole Minerals Strategy¹⁰⁵

Plan Owner/ Competent Authority:	Dorset County Council, Bournemouth Borough Council and Borough of Poole
Related HRA/AA:	Bournemouth, Dorset & Poole Minerals Core Strategy Pre-Submission Draft Conservation Regulations Assessment, January 2013 ¹⁰⁶
Notes on Plan documents:	<p>Adopted May 2014</p> <p>The Minerals Core Strategy replaces a number of saved minerals policies of the Dorset Minerals and Waste Local Plan (1999). The Minerals Core Strategy is part of the Minerals and Waste Development Framework, which also includes the Minerals Site Allocations Document and the Adopted Policies Map.</p>

Conclusions on potential effects of relevance to European sites within scope of HRA of New Forest Local Plans

The HRA Screening assessment finds all policies to be unlikely to have significant effects on European sites. Providing recommended additions and alterations in wording to policy, criteria and text are included, the Minerals Core Strategy is compliant with Habitat Regulations.

Bournemouth, Dorset and Poole Draft Waste Plan¹⁰⁷

Plan Owner/ Competent Authority:	Dorset County Council, Bournemouth Borough Council and Borough of Poole
Related HRA/AA:	Bournemouth, Dorset & Poole Draft Waste Plan Conservation Regulations Assessment

¹⁰³ <http://www3.hants.gov.uk/transport/local-transport-plan.htm>

¹⁰⁴ <http://www3.hants.gov.uk/transport/local-transport-plan.htm>

¹⁰⁵ <https://www.dorsetforyou.com/mcs>

¹⁰⁶ <https://www.dorsetforyou.com/mcs/examination-library>

¹⁰⁷ <https://www.dorsetforyou.com/waste-plan>

Bournemouth, Dorset and Poole Draft Waste Plan¹⁰⁷	
	Screening Report, July 2015 ¹⁰⁸
Notes on Plan documents:	Consultation on the Draft Waste Plan took place from 15 July to 23 September 2015 The Waste Plan sets out policies and identifies locations to guide development proposals during the Plan period.
Conclusions on potential effects of relevance to European sites within scope of HRA of New Forest Local Plans The HRA Screening report concluded there were no likely significant impacts to European sites. However, there was an element of uncertainty with policies 1-8 and 10. To ensure there are no likely significant impacts to European sites the report recommends that text is incorporated in policies regarding specific allocation of sites for waste development or allow for waste development in general.	

Bournemouth, Dorset and Poole Local Transport Plan¹⁰⁹	
Plan Owner/ Competent Authority:	Dorset County Council, Bournemouth Borough Council and Borough of Poole
Related HRA/AA:	Bournemouth, Poole & Dorset Local Transport Plan 2011-2026 Habitats Regulations Assessment Report, April 2011 ¹¹⁰
Notes on Plan documents:	Covers the period 2011-2026 and came into effect April 2011 Transport priorities for Bournemouth, Dorset and Poole: <ul style="list-style-type: none"> • Enhanced quality of life and sense of place • Meeting the needs of children and young people • Meeting the needs of an ageing population • A thriving and prosperous economy • Safer and stronger communities • Inclusive neighbourhoods promoting equality of opportunity • Protect, respect and enhance the environment • Improved health and wellbeing
Conclusions on potential effects of relevance to European sites within scope of HRA of New Forest Local Plans It is unlikely that the Local Transport Plan will have a significant effect on European designated sites, as long the recommendations provided the report are incorporated. The report recommends the addition of policies in section 9 regarding public transport alternatives to cars and the impacts of air pollution. Other recommendations include project level HRA for projects identified in the HRA Screening to avoid or mitigate for impacts. Equally, the report suggests monitoring commitments from the Strategic Environmental Appraisal should be adhered to.	

Wiltshire Minerals Core Strategy¹¹¹	
Plan Owner/ Competent Authority:	Wiltshire Council
Related HRA/AA:	Wiltshire & Swindon Aggregate Minerals Site Allocations DPD Pre-Submission Habitats Regulations Assessment Screening Report, January 2012
Notes on Plan documents:	The Minerals Core Strategy (adopted June 2009) sets out the spatial vision, key objectives and overall principles for development covering minerals provision up to 2026.
Conclusions on potential effects of relevance to European sites within scope of HRA of New Forest Local Plans The HRA identified three proposed extraction sites to lie in close proximity to European sites that may have potential significant effects. A detailed assessment concluded that these sites would not have a significant effect alone or in	

¹⁰⁸ <https://www.dorsetforyou.com/waste-plan>

¹⁰⁹ <https://www.dorsetforyou.com/article/417819/View-the-Local-Transport-Plan>

¹¹⁰ <https://www.dorsetforyou.com/article/402212/Strategic-Environmental-Assessments>

¹¹¹ http://www.wiltshire.gov.uk/planninganddevelopment/planningpolicy/mineralsandwastepolicy.htm#minerals_core_strategy

Wiltshire Minerals Core Strategy¹¹¹

combination with other plans on the European designated sites. Appropriate site level mitigation should be considered in regards to mineral extraction sites.

It is recommended that individual extraction sites should undergo project level HRA.

Wiltshire Waste Core Strategy¹¹²

Plan Owner/ Competent Authority:	Wiltshire Council
Related HRA/AA:	Habitats Regulations Assessment of the Wiltshire and Swindon Minerals and Waste Development Framework, December 2011
Notes on Plan documents:	The Waste Core Strategy (adopted July 2009) sets out the spatial vision, key objectives and overall principles for development covering the provision of sustainable waste management facilities up to 2026.

Conclusions on potential effects of relevance to European sites within scope of HRA of New Forest Local Plans

The HRA identified two of the 35 proposed sites were situated within a distance to the River Avon SAC and other European sites to have an adverse effect.

The implementation of robust site management plan and restricting the operation of facilities to daylight hours, were identified for waste development at the sites are considered to prevent significant adverse impacts. To address concerns about water pollution from Natural England, it is recommended that surface water management strategy that specifically considers the integration of surface water drainage systems is accompanied by any proposals for the two sites.

Wiltshire Local Transport Plan¹¹³

Plan Owner/ Competent Authority:	Wiltshire Council
Related HRA/AA:	Wiltshire Local Transport Plan 2011 – 2026 Habitat Regulations Assessment Screening, October 2010 ¹¹⁴
Notes on Plan documents:	The Wiltshire LTP sets out the council's objectives, plans and indicators for transport in Wiltshire. The third Wiltshire Local Transport Plan (LTP3) covers the period from March 2011 to March 2026.

Conclusions on potential effects of relevance to European sites within scope of HRA of New Forest Local Plans

The overall conclusion of the HRA is that there no significant effects on European sites, as long as recommended avoidance and mitigation measures are including in the LPT3 plan/daughter documents.

The HRA for the local transport plan of Wiltshire originally could not rule out the following significant effects:

Water quality: the HRA was unable to rule out significant affects to water quality of the River Avon SAC as a result of sedimentation from roads and bridleways. However, the implementation of a robust construction method statement for all works of any nature on roads adjacent to the SAC would remove any significant adverse effects on the features of the SAC.

Significant projects

None identified.

¹¹² http://www.wiltshire.gov.uk/planninganddevelopment/planningpolicy/mineralsandwastepolicy.htm#minerals_core_strategy

¹¹³ <http://www.wiltshire.gov.uk/council/howthecouncilworks/plansstrategiespolicies/transportpoliciesandstrategies/localtransportplan3.htm>
¹¹⁴ <http://www.wiltshire.gov.uk/council/howthecouncilworks/plansstrategiespolicies/transportpoliciesandstrategies/localtransportplan3.htm>

Appendix 4

Initial screening matrix for the Regulation 19
Submission draft Local Plan

Element of Local Plan	Interim screening conclusion (prior to mitigation)	Justification (see key in Chapter 3)	Potentially significant effects	European sites potentially affected
Chapter 1. Introduction				
Contains no policies	Screened out	F - Outlines the purpose of the Local Plan and its links to other plans and policies and describes cross-boundary planning issues. Does not contain any policies and will not lead to development or change.	N/A	N/A
Chapter 2. Profile of New Forest National Park				
Contains no policies	Screened out	F - Provides a social, environmental and economic profile of the National Park. Does not contain any policies and will not lead to development or change.	N/A	N/A
Chapter 3. Vision and objectives				
Contains no policies	Screened out	F - Sets out the planning challenges facing the National Park over the next 20 years and the ambition for the state of the New Forest in 2036.	N/A	N/A
Chapter 4. Strategic policies and development principles				
Policy SP1: Supporting sustainable development	Screened out	A - General support for sustainable development that does not conflict with the statutory purposes of the National Park. Criteria defining sustainable development.	N/A	N/A
Policy DP2: General Development Principles	Screened out	B - Requirement for all development proposals to demonstrate high quality design and construction which enhances local character and distinctiveness and criteria defining this. Cross reference to required standards for car parking (Annex 2) and open space (Policy DP10).	N/A	N/A
Policy SP3: Major Development in the National Park	Screened out	B, E - States that major development in the National Park will only be permitted in exceptional circumstances and lists factors to be assessed when considering applications for such development.	N/A	N/A
Policy SP4: Spatial Strategy	Screened in	A - Sets out the settlement hierarchy with the 'Defined Villages' of Ashurst, Brockenhurst, Lyndhurst, and Sway the focus for appropriate new community facilities, employment, retail, and housing development to meet local needs. States that the Local Plan also makes land use allocations in other parts of the National Park to contribute to meeting local need. States that development proposals will only be permitted outside of these Defined Villages (the boundaries of which have been reviewed as part of the Local Plan process and which are defined in the Policies Map) and allocated sites if they	Direct loss or physical damage to European sites Loss or damage to offsite supporting habitat Urban edge effects Changes in air quality Traffic collision	Potentially affected European sites identified via further screening in Chapter 4.

Element of Local Plan	Interim screening conclusion (prior to mitigation)	Justification (see key in Chapter 3)	Potentially significant effects	European sites potentially affected
		accord with Policies SP28, DP44 or DP49 (described below), or there is an essential need for a countryside location (Policy SP28), or it meets the specific locational needs for commoners (Policy SP29), Estate Workers (Policy SP30), or agricultural dwellings (Policy SP31). The policy is mostly implemented through other, more detailed Local Plan policies in <i>Chapter 7. Vibrant Communities</i> and <i>Chapter 8. A Sustainable Local Economy</i> but nevertheless defines the overarching principles governing where most development will be located and which uses are appropriate in these locations. Each type of potential effect from the combined operation of these development policies is considered further in Chapter 4.	risk Recreation pressure Changes in water quantity Changes in water quality	
Chapter 5. Protecting and Enhancing the Natural Environment				
Policy SP5: Nature Conservation Sites of International Importance	Screened out	D - Reiterates the need for all development to comply with the Habitats Regulations and notes that contributions to the Authority's Habitat Mitigation Scheme and/or the Solent Recreation Mitigation Partnership's Scheme can enable developers to secure mitigation, cross referencing separate guidance documents on these schemes. Further notes that avoidance or mitigation may not be possible in some cases and that the Authority will therefore assess each case on its merits.	N/A	N/A
Policy SP6: The Natural Environment	Screened out	D - Requires that proposals protect, maintain and enhance nationally, regionally and locally important sites and features of the natural environment.	N/A	N/A
Policy SP7: Landscape Character	Screened out	B, D - Sets out criteria for development proposals to demonstrate that they will conserve and enhance the New Forest's landscapes and seascapes.	N/A	N/A
Policy DP8: Safeguarding and Improving Water Resources	Screened out	D - Requires that development avoids harm to the quality and yield of water resources and requires all residential development within the part of the National Park supplied by Southern Water to be designed to achieve the Government's Optional Technical Standard for water efficiency (110 litres per person per day).	N/A	N/A
Policy SP9: Green Infrastructure	Screened out	D - Supports creation and enhancement of green infrastructure, particularly where it increases habitat connectivity or relieves recreational	N/A	N/A

Element of Local Plan	Interim screening conclusion (prior to mitigation)	Justification (see key in Chapter 3)	Potentially significant effects	European sites potentially affected
		pressure on internationally important nature conservation sites. Also commits the Authority to working with adjoining authorities and other partners to develop green infrastructure. Rules out provision of a new SANG within the National Park, other than in exceptional circumstances.		
Policy DP10: Open Space	Screened out	D - Resists loss of existing open space and requires new development to contribute to the enhancement of existing open space or provide new, on-site open space at a standard of 3.5 hectares per 1,000 population.	N/A	N/A
Policy SP11: Climate Change	Screened out	D - Sets out general principles for development to mitigate and adapt to climate change.	N/A	N/A
Policy DP12: Flood Risk	Screened out	D - Sets criteria that seek to manage flood risk in new development.	N/A	N/A
Policy DP13: Coastal Development	Screened out	A, B, D - General support for small scale coastal development outside of the main settlements subject to setting criteria designed to maintain the character and landscape of the undeveloped coast. Development would have to come forward through more specific proposals which would be subject to HRA through the development management process.	N/A	N/A
Policy SP14: Renewable Energy	Screened out	A, D - Whilst the policy provides generic support for renewable energy schemes and these could potentially have adverse effects on European sites, such schemes supported by this general policy statement would have to come forward through more specific proposals which would be subject to HRA through the development management process. In addition, the policy requires proposals to avoid harm to wildlife.	N/A	N/A
Policy SP15: Tranquillity	Screened out	D - New development is required to avoid noise, visual intrusion, nuisance and other unacceptable environmental impacts on the National Park and its special qualities.	N/A	N/A
Chapter 6. Protecting and Enhancing the Historic and Built Environment				
Policy SP16: The Historic and Built Environment	Screened out	D - Requires development proposals to protect or enhance nationally, regionally and locally important sites and features of the historic and built environment and specifies evidence required where there is the potential for harm.	N/A	N/A
Policy SP17: Local Distinctiveness	Screened out	D - Built development and changes of use which would individually or	N/A	N/A

Element of Local Plan	Interim screening conclusion (prior to mitigation)	Justification (see key in Chapter 3)	Potentially significant effects	European sites potentially affected
		cumulatively erode the Park's local character or result in a gradual suburbanising effect within the National Park will not be permitted.		
Policy DP18: Design Principles	Screened out	F - Requires high design standards in all new development and specifies design priorities in the National Park.	N/A	N/A
Chapter 7. Vibrant Communities				
Policy SP19: New residential development in the National Park	Screened in	<p>Provides for an additional 800 dwellings in the National Park during 2016-2036, specifically:</p> <ul style="list-style-type: none"> Local Plan site allocations (300 dwellings) – assessed via HRA of individual allocation policies below; extant planning permissions (just over 100 dwellings at 31/3/17) – will already have been subject to project level HRA, as appropriate; windfall development (estimated 400 dwellings) – would be subject to project level HRA, if relevant, as they come forward; rural exception sites (see assessment of Policy DP28 below); and housing for New Forest Commoners (see assessment of Policy SP29 below), estate workers (see assessment of Policy SP30 below), and tied agricultural dwellings (see assessment of Policy DP31 below). <p>Although each element of the policy is subject to more specific HRA, as appropriate, it nevertheless defines the total amount of housing to be developed in the plan period. Each type of potential effect from the combined operation of this policy with these more specific development policies is considered further in Chapter 4.</p>	As for Policy SP4	As for Policy SP4
Policy SP20: Specialist Housing for Older People (Use Class C2)	Screened in	<p>Supports provision of specialist housing for older people in the Defined Villages (Ashurst, Brockenhurst, Lyndhurst and Sway); such development elsewhere must not have a 'harmful impact on the locality'.</p> <p>Each type of potential effect from this housing is considered together with the potential effects of non-specialist housing in Chapter 4, drawing out any distinctions between the types of housing, if relevant.</p>	As for Policy SP4	As for Policy SP4

Element of Local Plan	Interim screening conclusion (prior to mitigation)	Justification (see key in Chapter 3)	Potentially significant effects	European sites potentially affected
Policy SP21: The size of new dwellings	Screened out	F - Defines a maximum floor area for new dwellings to ensure that the new housing delivered addresses local housing needs as much as possible.	N/A	N/A
Policy SP22: Land at Whartons Lane, Ashurst	Screened in	Provides for 60 new dwellings. Site-specific requirements of potential relevance to the HRA include contribution to enhancement of the adjacent recreation ground and provision of a connection to the nearest point of adequate capacity in the sewerage network. Each type of potential effect from this housing allocation is considered together with the potential effects of other housing in Chapter 4, drawing out site-specific considerations as relevant.	As for Policy SP4	As for Policy SP4
Policy SP23: Land at the former Lyndhurst Park Hotel, Lyndhurst	Screened in	Provides for mixed use development, including 50 dwellings and tourism use. None of the site-specific requirements are of potential relevance to the HRA. Each type of potential effect from this housing and tourism allocation is considered together with the potential effects of other housing in Chapter 4, drawing out site-specific considerations as relevant.	As for Policy SP4 except that tourism use judged unlikely to give rise to urban edge effects, as explained at paragraph 4.25.	As for Policy SP4
Policy SP24: Land south of Church Lane, Sway	Screened in	Provides for 40 new dwellings. Site-specific requirements of potential relevance to the HRA include that residential development will be limited to that part of the site lying more than 400 m from the boundary of New Forest SPA; that informal recreation on that part of the site within 400 m of the SPA will be supported; and that proposals must provide a connection to the nearest point of adequate capacity in the sewerage network. Each type of potential effect from this housing allocation is considered together with the potential effects of other housing in Chapter 4, drawing out site-specific considerations as relevant.	As for Policy SP4	As for Policy SP4
Policy SP25: Land adjacent to the former Fawley Power Station	Screened in	As an integrated part of a larger approach to regenerating the Fawley Power Station site within adjoining New Forest District local, provision is made in the New Forest National Park for 120 new dwellings, habitat mitigation, supporting infrastructure and community facilities (including a primary school) that cannot reasonably be achieved within the District Council area. Site-specific requirements of potential relevance to the HRA include provision of suitable greenspace for recreation and habitat enhancements to ensure net gains in biodiversity. Each type of potential effect from this	As for Policy SP4	As for Policy SP4

Element of Local Plan	Interim screening conclusion (prior to mitigation)	Justification (see key in Chapter 3)	Potentially significant effects	European sites potentially affected
		housing and supporting infrastructure/facilities allocation is considered together with the potential effects of other housing in Chapter 4, drawing out site-specific considerations as relevant.		
Policy SP26: Land at Calshot Village	Screened in	Provides for 30 new dwellings and cemetery use. None of the site-specific requirements are of potential relevance to the HRA. Each type of potential effect from this housing allocation is considered together with the potential effects of other housing in Chapter 4, drawing out site-specific considerations as relevant.	As for Policy SP4 in relation to the provision for new dwellings	As for Policy SP4
Policy SP27: Affordable Housing provision within the defined villages and on allocated sites	Screened out	F - Sets targets for the proportion of new dwellings to be provided as affordable homes on developments of different sizes.	N/A	N/A
Policy SP28: Rural Exceptions Sites	Screened out	B - Small-scale affordable housing developments may be permitted as exceptions on sites in or adjoining villages to meet the identified needs of local people in these areas. The criteria governing these exceptions are not directly relevant to the HRA. While the policy allows for rural housing development in exceptional circumstances, the general principle of that housing development is established in Policies SP4 and SP19 and assessed in Chapter 4. More detailed assessment is not possible until individual proposals come forward and these will be subject to project level HRA, if relevant, as part of the development management process.	N/A	N/A
Policy SP29: New Forest Commoners Dwellings	Screened out	B - Exceptionally, dwellings to meet the specific needs for New Forest Commoners may be permitted outside an existing settlement. While the policy allows for rural housing development to meet a tightly defined need, the general principle of that housing development is established in Policies SP4 and SP19 and assessed in Chapter 4. More detailed assessment is not possible until individual proposals come forward and these will be subject to project level HRA, if relevant, as part of the development management process.	N/A	N/A
Policy SP30: New Forest Estate Workers Dwellings	Screened out	B - Allows for the development of dwellings for Estate workers within the larger Estates of the National Park. The criteria governing these developments are not directly relevant to the HRA. While the policy allows for rural	N/A	N/A

Element of Local Plan	Interim screening conclusion (prior to mitigation)	Justification (see key in Chapter 3)	Potentially significant effects	European sites potentially affected
		housing development to meet a tightly defined need, the general principle of that housing development is established in Policies SP4 and SP19 and assessed in Chapter 4. More detailed assessment is not possible until individual proposals come forward and these will be subject to project level HRA, if relevant, as part of the development management process.		
Policy DP31: Agricultural and Forestry Workers Dwellings	Screened out	<p>B - Allows for the development of dwellings for those carrying out certain agricultural and forestry activities that require them to live close to the place of activity. The criteria governing these developments are not directly relevant to the HRA.</p> <p>While the policy allows for rural housing development to meet a tightly defined need, the general principle of that housing development is established in Policies SP4 and SP19 and assessed in Chapter 4. More detailed assessment is not possible until individual proposals come forward and these will be subject to project level HRA, if relevant, as part of the development management process.</p>	N/A	N/A
Policy DP32: Removal of Agricultural Occupancy Conditions	Screened out	F - Seeks to ensure that dwellings which have been permitted specifically to meet the needs of the rural economy normally remain available for that purpose by restricting the removal of occupancy conditions.	N/A	N/A
Policy SP33: Gypsies, Travellers and Travelling Showpeople	Screened in	<p>Allocates land within the existing gypsy site at Forest View, Landford for one additional pitch. In addition, further proposals will be supported where there is a need for the site to be located within the National Park and subject to various criteria, including that the development location will not result in a level of traffic generation inappropriate for the roads in the National Park.</p> <p>Each type of potential effect from this gypsy site allocation is considered together with the potential effects of general housing in Chapter 4, drawing out site-specific considerations as relevant.</p>	N/A	N/A
Policy DP34: Residential Character of the Defined Villages	Screened out	D, F - Development proposal densities should reflect the built heritage of the Defined Villages and their location within a nationally protected landscape.	N/A	N/A
Policy DP35: Replacement Dwellings	Screened out	B, D - Seeks to ensure that replacement dwellings are of a similar size to the existing dwelling, thereby avoiding the potential loss of smaller homes suited to local need and increased impact on the protected landscape of the National Park.	N/A	N/A

Element of Local Plan	Interim screening conclusion (prior to mitigation)	Justification (see key in Chapter 3)	Potentially significant effects	European sites potentially affected
Policy DP36: Extensions to Dwellings	Screened out	B, D - Seeks to restrict the size of extensions to existing dwellings other than in exceptional circumstances, thereby avoiding the potential loss of smaller homes suited to local need and increased impact on the protected landscape of the National Park while helping to meet changes in householder requirements.	N/A	N/A
Policy DP37: Outbuildings	Screened out	B, D - Seeks to ensure that the number, scale and design of outbuildings within the curtilage of a dwelling do not detract from the character or appearance of the dwelling, the site and the surrounding area while recognising the role of outbuildings in supporting home-working.	N/A	N/A
Policy SP38: Infrastructure Provision and Developer Contributions	Screened out	A - Requires development proposals to make provision for the infrastructure necessary to ensure that the development is acceptable in planning terms, subject to viability considerations. Any infrastructure coming forward as a result of such contributions would be subject to project level HRA, if relevant, through the development management process, as appropriate.	N/A	N/A
Policy SP39: Local Community Facilities	Screened out	A - Whilst the policy provides generic support for the development of essential, locally accessible and beneficial community facilities proportionate to the local area, these would have to come forward through more specific proposals which would be subject to project level HRA, if relevant, through the development management process, as appropriate.	N/A	N/A
Policy DP40: Change of Use from retail in the Defined Villages	Screened out	F - Restricts change of use from retail to other uses in defined local shopping frontages.	N/A	N/A
Policy DP41: Retail Development outside the Defined Villages	Screened out	E, F - Outside the Defined Villages, small-scale convenience shops within rural settlements that serve local needs, and farm shops that are part of a farm diversification will be permitted. Development should not extend into the open countryside or have impacts on adjoining land uses. By directing rural, retail development to within existing settlements or farm premises the policy helps to steer potential effects away from European sites. In addition, any retail proposals coming forward under the generic support offered by this policy would be subject to project level HRA, if relevant, through the development management process, as appropriate.	N/A	N/A
Chapter 8. A Sustainable Local				

Element of Local Plan	Interim screening conclusion (prior to mitigation)	Justification (see key in Chapter 3)	Potentially significant effects	European sites potentially affected
Economy				
Policy SP42: Business and Employment Development	Screened out	<p>A, E - Permits small scale employment development the four Defined Villages (Ashurst, Brockenhurst, Lyndhurst, and Sway); outside of these villages employment development must also be small scale and is restricted to the re-use or extension of existing buildings, the redevelopment of existing business use employment sites, farm diversification schemes and through home-working.</p> <p>The provisions of this policy help to reduce the potential for significant effects on European sites by ensuring that it is small in scale and is directed to existing villages or buildings. In addition, small scale employment development supported by this general policy statement would have to come forward through more specific proposals which would be subject to HRA, if relevant, through the development management process.</p>	N/A	N/A
Policy SP43: Existing Employment Sites	Screened out	<p>B, F - Policy seeks to retain existing employment sites. Within the four Defined Villages, mixed use developments may also be considered subject to various criteria not directly relevant to the HRA.</p> <p>Retention of existing employment sites will not lead to development. While the policy also allows for housing as part of mixed use development on existing employment sites, such development is directed to the four Defined Villages. The principle of housing development within these villages is tested through the assessment of Policy SP4 in Chapter 4. More detailed assessment is not possible until individual proposals come forward and these will be subject to project level HRA, if relevant, as part of the development management process.</p>	N/A	N/A
Policy DP44: Redevelopment of Existing Employment Sites	Screened out	<p>A, E - Policy supports redevelopment of established employment sites for industrial, office, and business uses within the existing site boundary subject to various criteria not directly relevant to the HRA.</p> <p>The provisions of this policy help to reduce the potential for significant effects on European sites by ensuring that it is directed to existing employment sites. In addition, employment development supported by this general policy statement would have to come forward through more specific proposals which would be subject to HRA, if relevant, through the development management process.</p>	N/A	N/A

Element of Local Plan	Interim screening conclusion (prior to mitigation)	Justification (see key in Chapter 3)	Potentially significant effects	European sites potentially affected
Policy DP45: Extensions to Non Residential Buildings and Uses	Screened out	B, D - The limited extension of existing non-residential buildings and uses will be permitted where it would not materially increase the level of impact of the activity on the site; and is contained within the existing site boundary.	N/A	N/A
Policy SP46: Tourism Development	Screened out	A, E - While the policy provides generic support for tourism development that is consistent with the special qualities of the National Park, this would have to come forward through more specific proposals which would be subject to project level HRA, if relevant, through the development management process. More specific support is provided for: small scale development of new visitor facilities and visitor accommodation in the four Defined Villages; re-use or extension of existing visitor facilities outside the Defined Villages; visitor facilities as part of farm diversification; retaining existing visitor accommodation; opportunities to relieve visitor pressure on designated nature conservation sites. In ensuring that development is small in scale and located in existing villages and buildings, the policy helps to steer potential effects away from European sites.	N/A	N/A
Policy DP47: Holiday Parks and Camp Sites	Screened out	D - Restricts new campsites or extensions to existing holiday parks, caravan or camping sites to those required to move pitches to less environmentally sensitive locations; i.e. a net gain in bed spaces will not be permitted. As such, the policy serves to protect the environment and avoid the potential effects of this form of tourism development on European sites.	N/A	N/A
Policy SP48: The Land-based Economy	Screened out	A - Policy supports affordable housing for commoners (Policy SP29), the supply of land for 'back-up grazing', agricultural and forestry buildings (subject to Policy DP50), farm diversification (in line with Policies SP46 and DP49), and farmers' markets. The strategic nature of the policy means that it will not directly result in development and that assessment is not possible until individual proposals come forward; these will be subject to project level HRA, if relevant, as part of the development management process.	N/A	N/A
Policy DP49: Re-use of Buildings outside the defined villages	Screened out	F - Enables the re-use or change of use of existing buildings which are appropriate to their New Forest setting, are a re-usable resource capable of conversion without significant reconstruction and are on sites which meet highway and other local authority standards. As such it will not result in	N/A	N/A

Element of Local Plan	Interim screening conclusion (prior to mitigation)	Justification (see key in Chapter 3)	Potentially significant effects	European sites potentially affected
		the development of new buildings.		
Policy DP50: Agricultural and Forestry Buildings	Screened out	B – The policy defines the criteria that will apply to the development of buildings required for agriculture or forestry use. This will not directly result in development and assessment is not possible until individual proposals come forward; these will be subject to project level HRA, if relevant, as part of the development management process.	N/A	N/A
Policy DP51: Recreational Horse Keeping	Screened out	D – By restricting recreational horse-keeping that would have adverse impacts on the New Forest in relation to nature conservation and other factors, the policy serves to help avoid the potential for adverse effects on European sites.	N/A	N/A
Policy DP52: Field Shelters and Stables	Screened out	D – By seeking to limit the proliferation of horse-riding related buildings in the New Forest (primarily because of their impact on the landscape), the policy serves to help avoid the potential for adverse effects on European sites.	N/A	N/A
Policy DP53: Maneges	Screened out	D – By seeking to avoid the potential adverse impacts of the development of all-weather riding arenas on the New Forest landscape and ecology, the policy serves to help avoid the potential for adverse effects on European sites.	N/A	N/A
Chapter 9. Transport and Access				
Policy SP54: Transport Infrastructure	Screened out	D – The policy states that development of strategic transport infrastructure in the National Park is not supported other than in exceptional circumstances and therefore serves to help avoid the potential for adverse effects on European sites. Any specific proposals that come forward would be subject to project level HRA, if relevant, through the development management process.	N/A	N/A
Policy SP55: Access	Screened out	F – The policy promotes safer access and more sustainable forms of transport to and within the National Park and will not lead directly to development.	N/A	N/A
Chapter 10. Monitoring and Implementation				
Contains no policies	Screened out	This section of the Local Plan describes arrangements for implementation of policies and monitoring of their outcomes and will not lead to development.	N/A	N/A

Appendix 5

Consultation responses

Table A4.1 Consultation on joint New Forest Local Plans HRA Scoping document

ID	Consultee	HRA Scoping Report ref.	Summary of comment received	LUC response
1	Natural England	Paras. 2.7-2.9: European sites to be included in the HRAs.	Mottisfont Bats SAC planning protocol establishes a buffer distance of 7.5 km beyond which likely significant effects on the designated bat population are unlikely; LUC encouraged to check whether the buffer overlaps with the NFDC boundary before scoping it into the HRA of the New Forest District Local Plan.	NFDC boundary lies just beyond a 7.5 km buffer around Mottisfont Bats SAC therefore potential for likely significant effects will be ruled out for HRA of the New Forest District Local Plan. Mottisfont Bats SAC remains in scope for HRA of the New Forest NPA Local Plan as the National Park is within approximately 6.0 km of the SAC at its closest point.
2	Natural England	Page 11: New Forest NPA's Development Standards SPD calls for developer contributions towards mitigation measures where developments are located within 400 m of the New Forest SPA. The NPA reports that since adopting the SPD it has become apparent that impacts can occur over greater distances and that mitigation is therefore normally sought for all development within the National Park, including visitor accommodation.	Natural England supports this change in approach which is consistent with that applied by NFDC.	See response below to comment 14 from NFNPA.
3	Natural England	Para. 2.25: The need to review NFDC's adopted Mitigation Strategy SPD in light of higher housing numbers. Table 3.2: Section on potential mitigation for recreation pressure.	Natural England would welcome consideration of the emerging 'Green Halo' project led by NFNPA in terms of how this could tie in with mitigation for recreational impacts on the New Forest European designations within both LPA areas.	Emerging 'Green Halo' project envisages a strategic approach to the provision of green infrastructure and the management of natural capital in a ring around the outer boundary of the National Park. It is recommended that NFDC and NFNPA give consideration to the potential contribution of this project to their respective recreation pressure mitigation strategies. The HRAs will take account of all proposed mitigation in the round.
4	Natural England	Paras. 3.23-3.24 The need for the two local planning authorities to review their existing recreation mitigation strategies in discussion with Natural England and other stakeholders to ensure that	Natural England would be happy to be involved in such discussions.	Noted.

ID	Consultee	HRA Scoping Report ref.	Summary of comment received	LUC response
		they will remain effective in light of the revised housing figures being proposed.		
5	Natural England	Appendix 2 Review of other plans and projects: Section on potential recreational disturbance of New Forest European sites from development proposed in Southampton Core Strategy.	Natural England is working with Southampton City Council to develop a mitigation package.	Noted.
6	Hampshire and Isle of Wight Wildlife Trust	Paras. 2.7-2.9: European sites to be included in the HRAs.	Natural England has recently been holding a public consultation in relation to a proposed new SPA along the Dorset and Hampshire coast for the common, sandwich and little terns. We note that this pSPA is not included within the list of European sites in the scoping document.	Sites only require HRA once formally approved by Government as potential Special Protection Areas (pSPA), whilst they await classification as SPAs. At the time of writing Natural England had consulted on a proposal to approve Solent and Dorset Coast as a marine pSPA but this approval had not yet been given. The status of this site will be kept under review.
7	Hampshire and Isle of Wight Wildlife Trust	Paras. 2.7-2.9: European sites to be included in the HRAs.	We question the exclusion of the River Itchen SAC from the scoped-in list of European sites, recognising that whilst largely located outside of the 10km buffer established for the study zone, impact upon the Itchen is a significant concern in relation to water supply to new developments. Southern Water supply the eastern half of the New Forest which falls within their 'Hampshire South' Water Resources Zone; much of the water supply for which comes from the River Itchen SAC. Increased development within this zone puts at risk the planned 'sustainability reductions' which will see reduced abstraction from the Itchen in order to ensure that conservation objectives are achieved. We therefore consider it important that, (in the context of water supply), impacts upon the River Itchen SAC are considered during the HRA of relevant local plans.	Agreed. River Itchen SAC will be scoped into the HRA for both authorities' Local Plans in relation to their potential to have adverse effects in relation to water supply/changes in water quantity.
8	Hampshire and Isle of Wight Wildlife Trust	Mitigation of potential effects of development of water quantity.	Important that local plans encourage adoption of the fullest range of water efficiency measures by new developments; whilst basic measures such as efficient appliances, fixtures and fittings make a valuable contribution, Local Authorities should aspire to see developments in their areas incorporating more substantial solutions such as rainwater harvesting and grey-water recycling. As well as significantly reducing the use of treated drinking water, such interventions can deliver additional benefits for localised water	It is recommended that NFDC and NFNPA take this into account when preparing their Local Plans.

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			management by reducing volumes of runoff or discharges of waste water from a site.	
9	Hampshire and Isle of Wight Wildlife Trust	Table 3.2 Section relating to proposed approach to screening for water quality effects.	Need to consider the potential impacts of private sewerage as well as WwTWs as these are highlighted by the Site Improvement Plan for New Forest SAC and SPA.	<p>Noted - the assessment of potential effects of development on water quality will include the potential impacts of private sewerage on New Forest SAC and SPA.</p> <p>Avoidance may be more appropriate than mitigation in light of the conclusions of research document NECR179¹¹⁵. This finds that the most effective measures are use of low-P detergents, which are beyond the control of a Local Plan, or chemical precipitation, which is <i>"not appropriate for widespread use due to personal & environmental safety issues"</i>.</p> <p>At a HRA stakeholder meeting on 9/8/16, NFDC confirmed that its Local Plan will state that all major allocations must be connected directly to the public mains sewer network. Natural England provided advice subsequent to the meeting which is reflected in the notes below.</p> <p>Research commissioned by Natural England¹¹⁶ has shown that phosphorus originating from septic tank discharges can move laterally through the soil profile for a distance of 20-30m in a variety of soil types. The study therefore concluded and that the current legislative value of 10 m for the separation of a septic tank soakaway from a watercourse (The Building Regulations, 2000) is probably insufficient to protect that waterbody from P pollution from this source, even where the local hydrology does not provide a shortcut for the delivery of septic tank discharges to water.</p> <p>The HRA Screening will therefore assume that, prior to mitigation, likely significant effects on water quality cannot be ruled out where development is not likely to be connected to a public sewer and is within 30 m of a European site. In this regard, it is notable that the Environment Agency will not allow a new discharge from a septic tank or small sewage treatment plant if the property is within 30 m of a public sewer; this distance is multiplied by the number of properties, e.g. if there are 3 properties then the distance will be 3 x 30 metres = 90 metres. Exceptions may be permitted if the Environment</p>

¹¹⁵ May, L. & Woods, H. 2015. A review of the effectiveness of different on-site wastewater treatment systems and their management to reduce phosphorus pollution. Natural England Commissioned Reports, Number 179.

¹¹⁶ MAY, L., WITHERS, P.J., STRATFORD, C., BOWES, M., ROBINSON, D. & GOZZARD, E. 2015. Development of a risk assessment tool to assess the significance of septic tanks around freshwater SSSIs: Phase 1 – Understanding better the retention of phosphorus in the drainage field. Natural England Commissioned Reports, NECR171.

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				<p>Agency judges that connection to a public sewer is not feasible, e.g. because there is a physical barrier in the path of the connection route.</p> <p>Reliance on the following Environment Agency requirements¹¹⁷ for any new discharge from a septic tank or small sewage treatment plant should allow effects post-mitigation to be ruled out:</p> <ul style="list-style-type: none"> the effluent must be discharged to ground via a drainage field (a series of pipes with holes placed in trenches and arranged so that the effluent can trickle through the ground for further treatment), not to surface water, and discharges within 50 metres of a European site require a permit from the Environment Agency.
10	Hampshire and Isle of Wight Wildlife Trust	Table 3.2 Section relating to proposed approach to screening for water quality effects.	Suggest cross-referencing the list of sites listed in Table 3.2 as vulnerable to changes in water quality against Natural England's Site Improvement Plans and including all those with actions for water-dependent features.	European sites listed in the Scoping Report as vulnerable to changes in water quality already take account of information provided in Natural England's Site Improvement Plans, as set out in Appendix 1. Features identified as under current pressure or potential threat from water pollution do not include those for which Dorset Heaths SPA or New Forest SPA are designated; all other in-scope European sites are identified in Table 3.2 for consideration of water quality effects.
11	Hampshire and Isle of Wight Wildlife Trust	Other relevant plans and projects.	<p>Natural England is currently holding pre-consultation discussions with regard to the proposed route of the coastal path in Hampshire and on the Isle of Wight as required under the Coastal Access Act (2009).</p> <p>There is the potential for significant areas of previously inaccessible land, that form part of or lie adjacent to European sites, to be opened up for public access. There is the potential for increased recreational pressure and as such significant effects to occur in on parts of the European sites in affected areas. As such, we consider that these proposals and the potential impacts should be included within this HRA scoping document.</p>	<p>It is accepted that opening up coastal access in Hampshire and the Isle of Wight within or adjacent to European sites could increase recreation pressure on those European sites.</p> <p>The approach to HRA Screening set out in Table 3.2 of the HRA Scoping Report will result in identification of likely significant recreation pressure effects on relevant coastal European sites from the New Forest Local Plans alone, necessitating a mitigation strategy. Provided that the additional recreational pressures arising from the Local Plans are fully mitigated by the Councils' respective mitigation strategies it will not be necessary for HRA Screening to consider whether other plans and projects could result in an in combination recreation pressure effect.</p> <p>Nevertheless, it is recommended that the Councils consider how measures proposed by the mitigation strategies for their</p>

¹¹⁷ Environment Agency. (2015) *General binding rules: small sewage discharge to the ground*. [Online] Available from: <https://www.gov.uk/guidance/general-binding-rules-small-sewage-discharge-to-the-ground>

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				Local Plans can be designed to integrate with likely measures required to mitigate recreation pressure arising from any specific proposals for new coastal Rights of Way.
12	New Forest NPA	Several references throughout the scoping document (e.g. paras. 2.13, 2.21) to "open space" provision as a form of habitat mitigation.	The report may need to clarify the use of this term, as the existing planning policies for both the National Park and the District require the provision of public open space and habitat mitigation measures. In short, the requirement for development to provide public open space is independent of any requirement for habitat mitigation.	This will be clarified in future HRA documents.
13	New Forest NPA	Page 11 Text box on New Forest NPA's Development Standards SPD: Summary of key features of the NPA's existing mitigation package contained in its Development Standards SPD.	The summary is slightly misleading. There is no reference, for example, to "public open space" in Annex 5 of the NPA's Development Standards SPD – a point emphasised by the fact that the SPD has two separate chapters on open space and habitat mitigation. The separate nature of the mitigation and open space requirements is highlighted in paragraph 6.3.6 of the SPD which clarifies that, <i>"Policy DP3 of the Core Strategy also requires new development to contribute towards the provision of public open space in the National Park. It should be noted that this open space contribution – to be directed towards providing open space, sports pitches and children's play areas – is quite separate from mitigation for the impact of new development on protected habitats. The habitat mitigation contribution does not duplicate other open space contributions"</i> .	The summary of the NPA's existing mitigation package will be amended in future HRA documents to reflect the measures described in Annex 5 of the Development Standards SPD, namely access management; education and awareness of the impacts; and promoting and enhancing alternative recreation areas.
14	New Forest NPA	References to New Forest NPA Core Strategy Policy CP1 on pages 11 and 17 of HRA Scoping Report.	Policy CP1 in the Authority's adopted Core Strategy reflects the Habitats Regulations and applies to all development throughout the National Park. The HRA undertaken for the Core Strategy by Scott Wilson in 2009/10 commented that, <i>"All development will need to conform with Policy CP1, and thus development should be sited so as to avoid any adverse impacts on internationally designated sites."</i> Mention in Policy CP1 to housing development within 400 metres of the SPA reflected the conclusions of the HRA at the time and the low quantum of development proposed in the Core Strategy. Given the likelihood of an increase in the level of development in the National Park to be delivered through this Local Plan, the approach taken to habitat mitigation from all development in the National Park will need to be re-assessed as part of	<p>The extract from the 2009/10 HRA of the New Forest NPA Core Strategy appears to suggest that all types of impacts on European sites were ruled out provided that developments were more than 400 m from a European site. We have not placed blanket reliance on the previous position of Policy CP1. Instead, based on the evidence outlined in the Scoping Report, the proposed approach to HRA Screening set out in Table 3.2 of the HRA Scoping Report only uses a distance of 400 m in relation to 'urban edge effects from construction or occupation of buildings' such as cat predation and fly-tipping. Natural England's comments on the HRA Scoping Report do not object to the use of a 400 m assumption in this context.</p> <p>The justification text in Table 3.2 of the HRA Scoping Report will be amended to read:</p> <p><i>"A distance of 400 m was chosen based on the acceptance of</i></p>

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			the Local Plan Review. The HRA needs to look forward at the new planning context within the National Park, rather than referring back to existing policy positions.	<p><i>this distance by Natural England in the HRA of New Forest NPA's Core Strategy and the fact that similar distance buffers have been used elsewhere when considering the potential for effects of residential development on ground nesting birds."</i></p> <p>Natural England confirmed at an HRA stakeholder meeting on 9/8/16 that it is happy with the use of a 400 m distance when screening for potential 'urban edge effects from construction or occupation of buildings' on heathland sites.</p>
15	New Forest NPA	Para. 2.25 Key issues for the HRAs of the new Local Plans	The comments made in Paragraph 2.25 that: (i) the existing mitigation package was prepared in the context of the lower housing figure in the adopted Local Plan; and that (ii) it will be necessary for the HRA to include an assessment of the adequacy of the mitigation provided by the SPD in light of higher housing numbers; applies equally to the NPA's Habitat Mitigation Scheme as well as NFDC's Mitigation Strategy.	Agreed. The HRA of the New Forest NPA Local Plan will also include an assessment of the adequacy of the mitigation provided by the NPA's Habitat Mitigation Scheme, including any amendments in light of higher housing numbers.

Appendix 6

Additional information for the Appropriate Assessment

Loss or damage to offsite supporting habitat for qualifying bird populations

Each allocation site was assessed for its suitability for supporting identified SPA/Ramsar site designated species based on a number of parameters, including habitat type, shape and size of site, presence of negative factors, and presence of relevant bird records, as set out in Table A5.1.

Table A5.1: Suitability of allocated sites for hen harrier and merlin designated populations

Policy	Site Allocation Name	Review of Satellite Imagery	DATA SOURCE											Conclusion	Further site level survey required?
			Priority Habitat Affected?	Relevant HBIC SPA/Ramsar bird records within allocation?	Solent Wader and Brent Goose Strategy?	Undesignate d Solent Strategy Site?	HBIC Potential Wildlife Site?	Statutory wildlife designation?	Non-statutory wildlife designation?	Natural England - National Park Bird Data	Wader Survey - records of target wader species?	Nightjar Survey	Dartford Warbler		
SP22	Lane at Whartons Lane, Ashurst	Site is comprised of short horse grazed pasture encompassed by mature tree lines and woodlands. Whilst the surrounding tree lines may contribute to movements of foraging nightjar the site itself is of low suitability for SPA birds. Grazed pasture represents a habitat type which is used by foraging waders and wildfowl, however the presence and proximity of woodland edge features and the relatively small size of the field enclosure is likely to significantly reduce its suitability for supporting such species.	Unlikely - comprises horse grazed pasture but mature tree lines and woodland at site boundary	N/A due to low suitability of habitats present	No	No	No	No	No	N/A - no data available	No	No	N/A	Given the size and location of the site, it's setting in the ecological landscape, the low suitability of the habitats present, and the presence of negative factors, it is considered to be of negligible importance for SPA birds.	No - the habitats affected are unlikely to be important in maintaining populations of SPA birds
SP23	Land at Former Lyndhurst Park Hotel, Lyndhurst	Site is comprised of existing building(s) and associated car parking in the north, and mature gardens and broadleaved woodland in the south. Whilst the woodland represents a habitat type suitable for supporting foraging nightjar and nesting honey buzzard, the urban edge setting and presence of negative factors including lighting, human presence and severance from the wider landscape by the urban area of Lyndhurst is sufficient to render the site unsuitable for these species for offsite use.	Unlikely - comprises hardstanding, buildings and grazed pasture but mature tree line eastern site boundary	N/A due to low suitability of habitats present	No	No	No	No	Data not available	No	No - but several territories c. 0.5km and more to east	No	N/A	Given the size and location of the site, it's setting in the ecological landscape, the low suitability of the habitats present, and the presence of negative factors, it is considered to be of negligible importance for SPA birds.	No - the habitats affected are unlikely to be important in maintaining populations of SPA birds
SP24	Land South of Church Lane, Sway	Site is comprised of short horse grazed pasture encompassed by mature tree lines and woodlands. Whilst the surrounding tree lines may contribute to movements of foraging nightjar the site itself is of low suitability for SPA birds. Grazed pasture represents a habitat type which is used by foraging waders and wildfowl, however the presence and proximity of woodland edge features and the relatively small size of the field enclosure is likely to significantly reduce its suitability for supporting such species.	Unlikely - comprises horse grazed pasture but mature tree lines and woodland at site boundary	N/A due to low suitability of habitats present	No	No	No	No	Data not available	No	No - but several territories >0.5km to north east	No	N/A	Given the size and location of the site, it's setting in the ecological landscape, the low suitability of the habitats present, and the presence of negative factors, it is considered to be of negligible importance for SPA birds.	No - the habitats affected are unlikely to be important in maintaining populations of SPA birds
SP25	Land Adjacent to the Former Fawley Power Station	The site comprises a mosaic of tall grasslands, dense and scattered scrub and reedbed. The site does not appear to support any open water of areas of open habitat. Whilst the site is immediately adjacent to the Solent and Southampton Water SPA/Ramsar, the habitat types present are considered of low suitability for SPA/Ramsar wader and wildfowl species because of the presence of extensive scrub which is likely to remove the 'openess' typically favoured by these species. Scrub habitats and reedbed have the potential to be utilised by dartford warbler both for breeding and overwintering, whilst they may also be suitable for supporting roosting and hunting hen harrier and merlin.	Yes - includes acid grassland, neutral grassland, dense scrub, and reedbed	A maximum count of 4 Dartford warbler was recorded in 2010 within the tetrad which incorporates the site allocation. Breeding and wintering dartford warbler has been recorded in the Tom Tiddler SINC which encompasses the site and reedbed and dense scrub habitat in the south of the site allocation provides suitable habitat for this species - The site is located 3.5km to the east of the New Forest SPA for which Dartford warbler is a reason for designation, and it is unclear whether the records present at the site represent part of the New Forest SPA population. A single curlew was recorded in 2012 A maximum count of two merlin was recorded in the vicinity of the site in 2008 but only two seperate records have been identified. No records of hen harrier were identified within the vicinity of the site	Yes - the entire land parcel is included within the SWBGS	No	No	No	Yes - The entire site is located within the Tom Tiddlers SINC	N/A - no data available	No	No	HRA report recognises that birds associated with the adjacent SPA have been recorded within the wider Tom Tiddler SINC but in insignificant numbers. The HRA also notes that Dartford Warbler have been recorded nesting and overwintering within the Tom Tiddler SINC which encompasses the site allocation. A draft Fawley and Calshot Nature Conservation Management Plan' sets out proposals for the wider area which would mitigate seek to mitigate for habitat loss, including habitat creation, restoration and management.	In general, the tall grassland, scrub and reedbed habitats which comprise the majority of the site are considered of low suitability for SPA birds. Scrub habitats and reedbed are suitable for supporting wintering and breeding dartford warbler, and wintering merlin and hen harrier. The site alone is considered unlikley to be important in maintaining SPA/Ramsar bird populations, however it may contribute in-combination towards maintaining populations of wintering merlin and hen harrier, and breeding and overwintering dartford warbler. Furthermore, it is unclear whether records of low numbers of dartford warbler within the Tetrad which includes the site relates to the population for which the New Forest SPA is in part designated. Indeed, the 'New Forest Dartford Warbler 2014 Survey Report' did not include this area within the survey of the New Forest area. In light of the above, further survey will be required to determine the extent to which these birds rely upon the area affected (if at all), to inform any specific mitigation requirements. This can be considered a precautionary and acceptable approach at the Local Plan level because it is considered likely that suitable mitigation, if required, could be provided on-site or in the vicinity, for example as part of the emerging 'Fawley and Calshot Nature Conservation Management Plan' through habitat creation and management.	Yes - Whilst the habitats affected are unlikely to be important alone in maintaining populations of SPA birds they may contribute to the network of habitat which supports wintering merlin, hen harrier and Dartford warbler. Site based surveys are required to provide certainty that appropriate mitigation could be provided if required.
SP26	Land at Calshot Village	The site comprises scrub habitats, scattered trees and rough grassland. Given the small and narrow size of the site, its proximity to adjacent existing residential development, and it's location within the wider ecological landscape, it is considered of negligible importance for SPA/Ramsar birds.	possibly - site appears to support dense scrub and rough grassland	N/A due to low suitability of habitats present	Yes - the entire land parcel is included within the SWBGS	No	No	No	No	N/A - no data available	No	No	N/A	The site comprises scrub habitats, scattered trees and rough grassland. Given the small and narrow size of the site, its proximity to adjacent existing residential development, and it's location within the wider ecological landscape, it is considered of negligible importance for SPA/Ramsar birds.	No - the habitats affected are unlikely to be important in maintaining populations of SPA birds
SP33	Gypsy Site at Forest View, Landford	The western half of the site comprises hardstanding and building whilst the eastern half comprises grazed pasture with patches of tall ruderal vegetation. A mature tree line runs along the western edge of the site. Given the small size and the low suitability of the habitats which comprise the majority of the site, it is considered to be of negligible importance for SPA birds.	Possibly - mature tree line runs along western site boundary	N/A due to low suitability of habitats present	No	No	No	No	No	N/A - no data available	No	No	N/A	Given the small size and the low suitability of the habitats which comprise the majority of the site, it is considered to be of negligible importance for SPA birds.	No - the habitats affected are unlikely to be important in maintaining populations of SPA birds