

Habitats Regulation Assessment (Stage 1 Screening) of the East Cambridgeshire SIR Local Plan (Regulation 19)

Main Report

May 2022

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List of Abbreviations

AA	Appropriate Assessment
EOMS	European Offshore Marine Sites
HRA	Habitats Regulations Assessment
IROPI	Imperative Reasons of Over-Riding Public Interest
IRZ	Impact Risk Zone
JNCC	Joint Nature Conservation Committee
LSE	Likely Significant Effects
NPPF	National Planning Policy Framework
SAC	Special Areas of Conservation
SIP	Site Improvement Plan
SPA	Special Protection Areas
SSSI	Site of Special Scientific Interest
WFD	Water Framework Directive

1. Introduction and Background

1.1 Introduction

- 1.1.1 East Cambridgeshire District Council (ECDC) is currently preparing a very limited 'Single Issue Review' (SIR) update of its 2015 Local Plan. The SIR is at Publication Draft (Regulation 19) stage.
- 1.1.2 This report is the Habitats Regulations Assessment (HRA) of the SIR Local Plan (May 2022). It sets out the methodology, findings and conclusions of the HRA process, to determine whether the SIR Local Plan, either alone or in combination with other plans or projects, is likely to have a significant effect on a European site. It has been prepared in accordance with the requirements of the Habitats Regulations 2017 (as amended) (the 'Regulations').¹
- 1.1.3 The first stage of the HRA process is the preparation of a Stage 1 Screening Assessment, which assesses whether the SIR Local Plan is likely to have a significant effect, either alone or in-combination with other plans and projects, on the integrity of European nature conservation sites. This report presents the results of Stage 1. Should the Stage 1 assessment conclude that the SIR Local Plan, either alone or in combination with other plans or projects, is likely to have a significant effect, then the HRA process proceeds to Stage 2 Appropriate Assessment.
- 1.1.4 ECDC has also prepared a Sustainability Appraisal (incorporating Strategic Environmental Assessment) report and this work has been undertaken alongside the HRA, with the two assessments informing each other where appropriate.

1.2 SIR Local Plan

- 1.2.1 East Cambridgeshire District Council is undertaking a narrowly focused Single Issue Review (SIR) of its adopted Local Plan.
- 1.2.2 The purpose of the SIR is to partially replace a very small part of the Local Plan adopted in April 2015. The intention is for the vast majority of the Local Plan (2015) to remain unaltered and remain part of the development plan for East Cambridgeshire. Only policy GROWTH 1, and some supporting text, is proposed to be amended. That policy sets, inter alia, the housing requirement for the district.
- 1.2.3 In 2021-2022, two consultations took place on the initial proposal of the SIR Local Plan. After giving due consideration to the comments made, revised versions of document were produced leading to the Publication Draft or Proposed Submission (regulation 19) draft SIR Local Plan. This HRA report is based on the latest SIR document.
- 1.2.4 Further details on the timetable for preparing the SIR can be found in the separate Local Development Scheme (LDS) available on the Council's website.

¹The Conservation of Habitats and Species Regulations 2017 SI No. 2017/1012, TSO (The Stationery Office), London. Available at: <https://www.legislation.gov.uk/uksi/2017/1012/contents>; The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. Available at: <https://www.legislation.gov.uk/ukdsi/2019/9780111176573>

1.3 Purpose, Scope and Structure of this Report

- 1.3.1 The purpose of this report is to document the HRA assessment of the SIR Local Plan, as required under Regulation 105 of the Regulations.
- 1.3.2 The scope of the HRA covers only the proposals set out in the SIR Local Plan. Out of scope is the remaining (and vast majority of) the Local Plan adopted in 2015, because the content of that will remain unchanged as a consequence of the SIR proposals.
- 1.3.3 This HRA report therefore focusses only on the proposal to update the housing requirement in policy GROWTH 1, that being the only policy subject to proposed change.
- 1.3.4 The report sets out the methodology, findings and conclusions of Stage 1 Screening Assessment of the HRA process. It is structured into the following sections:
- **Section 1 Introduction and Background:** provides an overview of the SIR Local Plan and the purpose and structure of this report;
 - **Section 2 Habitats Regulations Assessment Legislation and Requirements:** provides an overview of HRA legislation, guidance and best practice and consultation with Natural England;
 - **Section 3 Habitats Regulations Assessment Process:** identifies the key stages in the HRA process;
 - **Section 4 Identification of European Sites:** sets out those European sites that are included in the assessment and their key pressures, threats and vulnerabilities;
 - **Section 5 HRA Methodology:** sets out the approach taken for the Stage 1 Screening Assessment process, including the main assumptions in relation to potential effects, and the screening categories;
 - **Section 6 Stage 1 HRA Screening Assessment and Conclusions:** identifies whether the plan, either alone or in combination with other plans or projects, is likely to have a significant effect on European sites;

2. Habitats Regulations Assessment Legislation, Guidance and Best Practice

2.1 Legislation

- 2.1.1 The HRA process assesses the potential effects of a plan or project on the conservation objectives of sites afforded the highest level of protection in the UK. These were classified under European legislation (the ‘Habitats Directive’ and the ‘Birds Directive’), but since 1 January 2021, they are protected in the UK by the Habitats Regulations 2017 (as amended).
- 2.1.2 The sites previously formed a network of internationally important sites throughout Europe designated for their ecological status – known as the ‘Natura 2000’ Network. Sites within the network were referred to as ‘Natura 2000 sites’. However, a UK Government Policy Paper² on changes to the Habitats Regulations 2017 post Brexit stated that any references to Natura 2000 in the Regulations and in guidance now refers to ‘European’ sites and the new ‘national site network’. The national site network includes Special Protection Areas (SPAs) and Special Areas of Conservation (SACs) designated under these Regulations.
- 2.1.3 The Policy Paper goes on to state that proposed SACs, potential SACs, Ramsar sites and any areas secured as sites compensating for damage to a European site, also require a HRA because they are protected by government policy. Ramsar sites (Designated Wetlands of International Importance) do not form part of the national site network, however they remain protected in the same way as SPAs and SACs. Many Ramsar sites overlap with SPAs and SACs and may be designated for the same or different species and habitats.
- 2.1.4 Provision 105 (1) of the Conservation of Habitats and Species Regulations 2017 requires Appropriate Assessment (AA) to be undertaken for plans and projects which are likely to have a significant effect on one or more European sites, either individually, or in combination with other plans and projects. This does not apply to plans or projects directly connected to the conservation management of the features for which the European site was designated.
- 2.1.5 The term ‘Habitats Regulations Assessment’ has emerged to refer to the several distinct stages of the overall assessment process, from screening through to Imperative Reasons of Over-Riding Public Interest (IROPI). The purpose of HRA is to assess the impacts of a plan or project, in combination with the effects of other plans and projects, against the conservation objectives of a European site and to ascertain whether it would adversely affect the integrity of that site. Where significant negative effects are identified, alternative options or mitigation measures should be examined to avoid any potential damaging effect.

2.2 Recent Case Law

- 2.2.1 In April 2018, the Court of Justice for the European Union, in *People Over Wind & Sweetman v Coillte Teoranta*³, ruled that when making screening decisions for the purposes of deciding whether an appropriate assessment is required, competent authorities cannot take into account any mitigation measures. This means that measures which have been specifically added to a plan or project to achieve the purpose of avoiding or reducing its harmful effects on a habitats site should not be considered at the screening stage. A full and precise analysis of the measures capable of avoiding or reducing any significant effects

² DEFRA (2021) Habitats Regulations Assessments: Protecting a European Site

³ <http://curia.europa.eu/juris/document/document.jsf?docid=200970&doclang=EN>

on the site concerned must be carried out specifically at Stage 2 Appropriate Assessment, and not as part of the Screening stage. This is a departure from the approach established by domestic case law. The Habitats Regulations have been amended to reflect this change in the law⁴.

2.2.2 In March 2017, a high court ruling⁵ found that traffic increases and subsequent air pollution in roads within 200m of a European site, should be considered alone and in-combination with relevant plans and projects.

2.2.3 In November 2018, the *Holohan v An Bord Pleanala* judgement stated that:

“Article 6(3) of Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora must be interpreted as meaning that an ‘appropriate assessment’ must, on the one hand, catalogue the entirety of habitat types and species for which a site is protected, and, on the other, identify and examine both the implications of the proposed project for the species present on that site, and for which that site has not been listed, and the implications for habitat types and species to be found outside the boundaries of that site, provided that those implications are liable to affect the conservation objectives of the site.”

2.2.3 This means that a HRA must consider the potential for effects on habitats and species located beyond the boundaries of European sites that may be important in supporting the ecological processes of the qualifying features.

2.3 HRA Guidance and Best Practice

2.3.1 The Regulations do not prescribe a particular methodology for carrying out the HRA of Local Plans.

2.3.2 The HRA of the SIR Local Plan will be carried out in accordance with current available guidance and best practice, and seeks to meet the requirements of the Regulations. The main guidance includes:

- 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, 2001);
- Appropriate Assessment – Guidance on the Use of Habitats Regulations Assessment (Ministry of Housing, Communities & Local Government July 2019⁶; and
- Scottish Natural Heritage guidance on HRA of Plans: ‘Habitats Regulation Appraisal of Plans Guidance for Plan Making Bodies in Scotland’ (David Tyldesley and Associates for Scottish Natural Heritage, August 2010 and updated January 2015).

2.3.2 Although the later guidance is for Scottish Plan making bodies, it is considered that the general principles and approaches set out in this guidance are transferable and can be applied to HRA in England, subject to minor revisions.

2.4 Definition of Key Terms

2.4.1 **“Integrity”** is defined as “...*the site’s coherence, ecological structure and function across its whole area that enables it to sustain the habitat, complex of habitats and/or the levels of*

⁴ <http://www.legislation.gov.uk/ukxi/2018/1307/contents/made>

⁵ *Wealden District Council v Secretary of State for Communities and Local Government & ors:* <http://www.bailii.org/ew/cases/EWHC/Admin/2017/351.html>

⁶ <https://www.gov.uk/guidance/appropriate-assessment>

populations of species for which it was classified” (ODPM Circular 06/2005, para 20.). The ‘integrity test’ is undertaken during Stage 2 Appropriate Assessment.

- 2.4.2 Regulation 105 of the Habitats Regulations, requires an assessment of the ‘likely significant effects’ of a land use plan. A “**Significant**” effect is one that could adversely impact on a European site’s integrity, i.e. it would undermine the conservation objectives for the site. It is typically determined by considering the extent, complexity, probability, duration, frequency and reversibility of the effect.
- 2.4.3 The likelihood of it occurring should adopt the precautionary principle⁷, taking into account the ecological circumstances of the site. 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.*” (ECJ Case C-127/02 “Waddenzee” Jan 2004).
- 2.4.4 Significance will vary from site to site according to conservation sensitivities and magnitude of potential impact. Assessment is triggered by likelihood, not certainty, in line with the precautionary principle. Therefore Stage 1 of the HRA considers where the effects are ‘likely’ and ‘significant’. Those effects which are trivial may be disregarded. Significant effects are also determined in-combination with other plans or projects and take account of cumulative effects.

2.5 Consultation with Natural England

- 2.5.1 Natural England is the statutory nature conservation body for HRA, and who has a general duty to assist in obtaining the necessary information, help agree the process and work with the competent authority on agreeing the outcomes and mitigation proposals. East Cambridgeshire District Council must consult Natural England, and have regard to its advice, under provision 105 (2) of the Habitats Regulations.
- 2.5.2 The authorities may also consult other bodies and the general public, if considered appropriate (provision 105 (3)). This HRA Report has been published on the ECDC website and as such, views on the report are welcomed from anybody, during the consultation period of the SIR Local Plan.
- 2.5.3 This HRA Report has been sent to Natural England in accordance with provision 105 (2).

⁷ This is described by the European Commission as being: “*If a preliminary scientific evaluation shows that there are reasonable grounds for concern that a particular activity might lead to damaging effects on the environment, or on human, animal or plant health, which would be inconsistent with protection normally afforded to these within the European Community, the Precautionary Principle is triggered*”.

3. Main Stages of HRA

3.1 Stages of HRA

3.1.1 There are 4 main stages to the HRA process.

3.1.2 The first step is to decide whether a plan or project should be subject to HRA. This will depend on the type of plan or project and on its potential effects on a European site. All plans and projects (including planning applications) which are not directly connected with, or necessary for, the conservation management of a habitat site, require consideration of whether the plan or project is likely to have significant effects on that site.

3.1.3 A competent authority must therefore first consider: *'Is the plan or project directly connected with or necessary to the management of a European site for nature conservation purposes?'*. If the answer is no, which is the case for the SIR Local Plan, then HRA is required and the following sequence of stages should be undertaken:

Stage 1 Screening for Likely Significant Effects (LSE)

3.1.4 The first stage of the HRA is to identify the likely impacts of a plan or project (alone or in combination with others) upon a European site, and to consider whether these impacts are likely to be 'significant', i.e. Likely Significant Effects (LSE).

3.1.5 The aim of Stage 1 Screening is to identify and screen out those parts of a plan or project that, either alone or in-combination, without detailed assessment, can be determined as unlikely to result in significant effects upon European sites. The screening exercise should be approached on a precautionary basis. If the screening stage concludes that there are likely to be no significant impacts on European sites then there will be no need to progress to Stage 2 Appropriate Assessment. If effects are judged likely or uncertain, the precautionary principle is applied and the Plan is considered in more detail in Stage 2.

Stage 2 Appropriate Assessment (AA)

3.1.6 Where the screening process undertaken in Stage 1 determines that the Plan is likely to have a significant effect on a European site, the assessment proceeds to Stage 2 AA. The Ministry of Housing, Communities & Local Government published guidance on AA explains:

*"Where the potential for likely significant effects cannot be excluded, a competent authority must make an appropriate assessment of the implications of the plan or project for that site, in view the site's conservation objectives. The competent authority may agree to the plan or project only after having ruled out adverse effects on the integrity of the habitats site."*⁸

3.1.7 This stage considers the impact of a plan or project (alone or in combination with others and directly or indirectly) on the integrity of the European site, with respect to the site's conservation objectives and to their structure and function⁹. The scope and content of the AA will depend on the nature, location, duration and scale of the proposed plan or project and the interest features of the relevant protected site. The assessment needs to be proportionate and sufficient to enable the competent authority to determine whether the plan or project will adversely affect the integrity of the site.

3.1.8 Should the AA identify significant effects on a site's integrity, there is a need to consider potential mitigation. Mitigation measures are protective measures forming part of a project and are intended to avoid or reduce any direct adverse effects that may be caused by a

⁸ Paragraph 001 Reference ID: 65-001-20190722

⁹ Natural England's formal advice on conservation objectives for European sites is publicly available online: <http://publications.naturalengland.org.uk/category/6490068894089216>

plan or project, to ensure that it does not have an adverse effect on the integrity of a protected site(s). The mitigation hierarchy should be applied. Alternatives, such as changes to the Plan, should be examined first to avoid any potential damaging effects. If no alternative exists, impact reduction measures should be defined and evaluated. If effects remain after all alternatives and mitigation measures have been considered, the plan or project proceeds to Stage 3.

Stage 3 Assessment of Alternative Solutions

3.1.9 This stage examines and recommends alternative ways of achieving the objectives of the project or plan which avoid adverse impact on the integrity of the European site. If, after mitigation, there will still be a negative effect on the integrity of a European site, the plan should be dropped. The only exceptions are where it can be shown that there are 'imperative reasons of overriding public interest'.

Stage 4 IROPI and Compensatory Measures

3.1.9 After consideration of a plan or project under stages 1 to 3, and if it cannot be ascertained that a proposal will not adversely impact on the integrity of a European site, the proposal can only proceed if there are no alternatives solutions and there are IROPI. Any necessary compensation measures must be taken to secure the integrity of the European site network.

3.1.10 The stages outlined above must be undertaken with the rigorous application of the precautionary principle¹⁰. This requires those undertaking the exercise to be confident that the plan will not have a significant impact on relevant conservation objectives. Where uncertainty or doubt remains, an adverse impact should be assumed.

¹⁰ The Precautionary Principle, which is referenced in Article 191 of the Treaty on the Functioning of the European Union, has been defined by the United Nations Educational, Scientific and Cultural Organisation (UNESCO, 2005) as: *"When human activities may lead to morally unacceptable harm [to the environment] that is scientifically plausible but uncertain, actions shall be taken to avoid or diminish that harm. The judgement of plausibility should be grounded in scientific analysis."*

4. Identification of European Sites

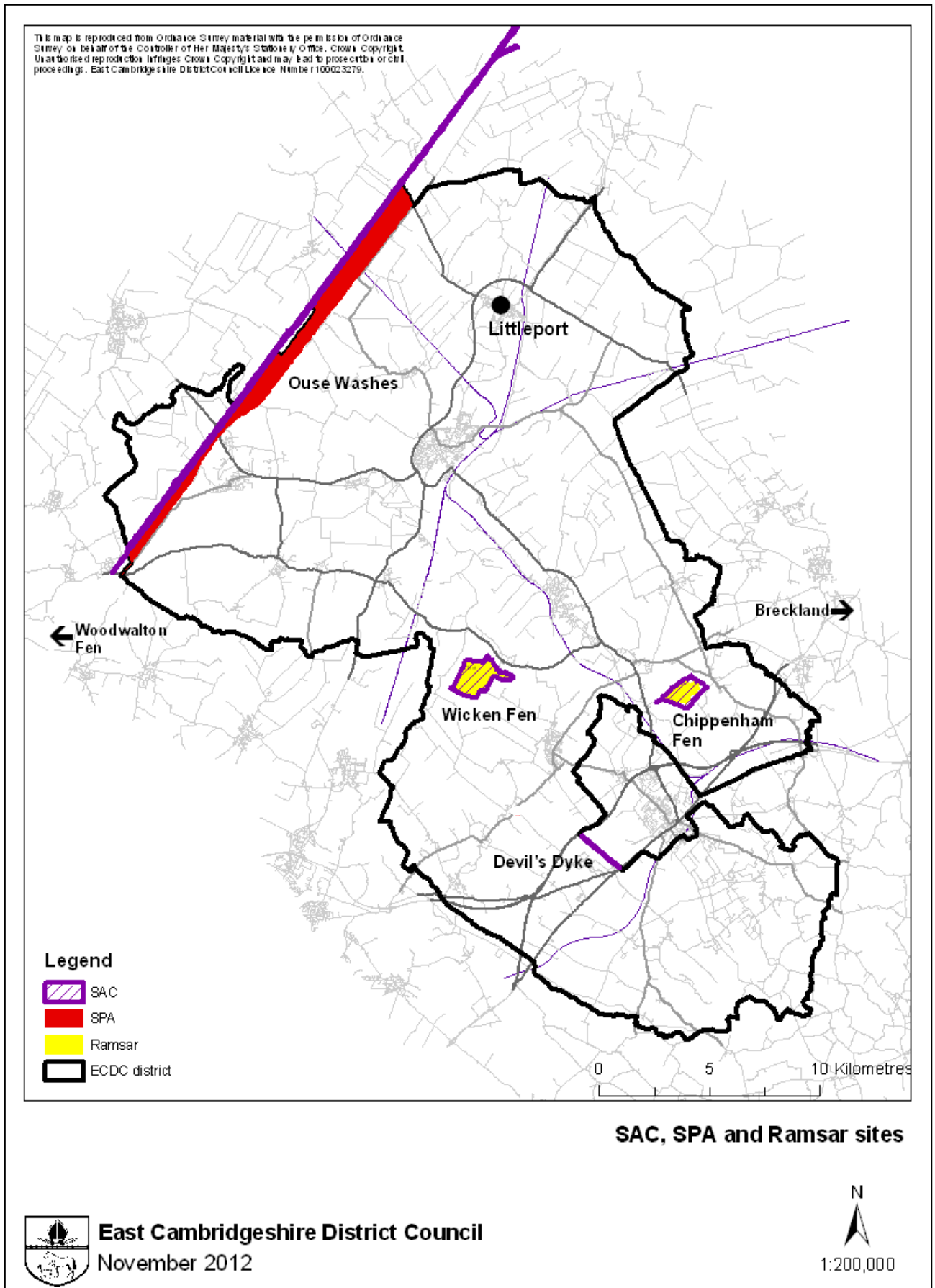
4.1 European sites that may be affected by the Local Plan

4.1.1 This section of the report identifies the European sites that may be affected by a plan or project in East Cambridgeshire and therefore those sites that should be initially considered as the study area for the HRA. In line with the precautionary principle, sites lying wholly, partially or within 15km of the district are included to reflect the fact that a plan or project may affect sites outside the plan area:

Site	Location	SAC	SPA	Ramsar
Fenland (Wicken Fen, Woodwalton Fen, Chippenham Fen)	Within (or partially within) the district (apart from the Woodwalton element, which is in Huntingdonshire district, and around 15km from the East Cambs district border)	✓		✓
Ouse Washes	Within (or partially within) the district	✓	✓	✓
Devil's Dyke	Within (or partially within) the district	✓		
Breckland	Outside the district, but within 15km (Forest Heath)	✓	✓	

Baseline Information

4.1.2 To enable a screening to be undertaken, details of each site, including their vulnerabilities, have been collated by the District Council and regularly updated and used for wider HRA purposes (i.e. for assessing other plans and projects). For reasons explained later in this screening report, it is not necessary to provide such detailed information in this report, but nevertheless a map of the designated sites located within East Cambridgeshire is provided overleaf.



Map of Location of European sites

5 HRA Methodology

5.1 Screening Methodology

Stages in the HRA Screening process

5.1.1 The HRA screening process is summarised in **Table 5.1** below.

Table 5.1: HRA Stage 1 Screening Key Stages

Stages	Habitats Regulation Assessment	Location in this Report
Stage 1. Screening for likely significant effects	Task 1 – Identify European sites in and around the plan area that should be considered in the assessment.	Section 4
	Task 2 – Gather information on the European sites, including the vulnerabilities of their qualifying features, conservation objectives and condition of site. Identify the changes to environmental conditions that may occur as a result of implementing the Plan.	Section 4 (but more detailed information is predominantly contained within in-house monitoring systems)
	Task 3 - Identify key components of the emerging SIR Local Plan, including the plan objectives and policies.	Section 1
	Task 4 – Determine, through a screening exercise, all aspects of the SIR Plan which would have no effect on a European site and those aspects where it is not possible to rule out the risk of significant effects, either alone or in combination with other plans or projects.	Section 6
	Task 5 - Consider whether other plans or projects, in conjunction with the SIR Local Plan, would have the potential for adverse effects on the qualifying features of identified sites.	Section 6
	Task 6 - Conclude whether there are likely significant effects. If there are no likely significant effects, consult Natural England on the screening recommendation that	Section 6

Stages	Habitats Regulation Assessment	Location in this Report
	the further AA stages of the HRA are not necessary.	
	Task 7 – If, after Task 6 significant effects are judged likely or uncertainty exists, or Natural England disagrees with the screening recommendation that an AA is not necessary proceed to Stage 2 AA.	Section 6

Screening Approach

5.1.2 The screening of the SIR Plan involves a series of steps to remove or ‘screen out’ those elements of the SIR Plan that are not likely to have a significant effect on a European Site, and to ensure other aspects of the Plan are ‘screened in’ where further appraisal is required. An assessment of the Plan will be undertaken using the criteria set out in **Table 5.2**.

5.1.3 These are broadly based on the screening categories set out within the HRA guidance for Scotland. When considering significant effects, effects which would not undermine the conservation objectives of a European site should not be regarded as significant: thus, where a policy/aspect of the SIR Plan may potentially have a positive significant effect on a European site, this policy/part can be ‘screened out’ because the impact would not be negative.

Table 5.2: Screening Categories for HRA Screening: Categorising the Potential Effects of the Plan

Screening Category	Type of Policy
‘N’ categories: screened out or eliminated elements of the Plan (Appropriate Assessment not required) Plan elements assessed as not likely to have a significant effect on a European site if implemented, either alone or in combination with effects from other plans or projects.	
N1	General Policy Statement General strategy statement or general criteria based policy not likely to have a significant effect as the policy will not lead to development itself.
N2	Policy refers to proposals that are not generated by the Plan and therefore excluded from the assessment. For example, a policy that refers to a transport project, which is identified in another Plan and possibly by another authority (and this will have been subject to HRA for the other Plan).
N3	Policies that intend to protect, conserve or enhance the natural (including biodiversity), built or historic environment, or that positively steers development away from European sites.
N4	Policy that will not lead to development or other change, because it is qualitative or design criteria based, which guide development.
N5	Policy makes provision for change or promotes development but would have no likely significant effect on a European site Policies that promote development, but have no likely significant (negative) effect because there is

	no physical, ecological, hydrological, chemical or biological link or pathway between the changes the policy may cause and the site’s qualifying interests of any European site. This category also covers policies that may have a positive effect; or would not otherwise undermine the conservation objectives for the site. A Plan's positive effects on a site cannot be regarded as 'significant' and can therefore be 'screened out'.
N6	Policies that make provision for change/promotes development in specific areas, but would have no significant effect on a European Site Policies that could have effects that are trivial or 'de minimis', or so restricted in scale or remote from a European site, even if combined with other effects, that they would not undermine the conservation objectives for the European site. For example, a policy that focuses development in existing urban areas whereby the likelihood of the policy affecting an isolated, relatively inaccessible European site is remote.
N7	Policies that promote development or change but where it is so general it is not known where, when or how the aspect of the Plan may be implemented or where the potential effects may occur, or which European sites, if any, may be affected. These are very general / strategic policies or proposals which are too general to identify any effect as it is not known where, when or how the aspect of the Plan may be implemented, or where any potential effects may occur, or which European Sites, if any, may be affected. These plan aspects may be very similar to the general policy statements screened under N1, but are different in that they promote overall change.
'P' category: screened in elements of the Plan (Appropriate Assessment required) Plan considered likely to have a significant effect on a European site	
P	Policy/proposal/element of the Plan with potential to have a likely significant effect and therefore subject to further assessment, including consideration of potential mitigation measures. This category will cover: <ul style="list-style-type: none"> • Policies which have been identified as having likely significant effects, either alone or in combination, and directly or indirectly, and are therefore subject to further appraisal; and • Policies where it is not possible to conclude likely significant effects as this is currently uncertain.

5.1.4 The outcome of the screening assessment will be recorded and presented in screening matrices. A colour code will be applied to the categories used to record the potential effects of the SIR Local Plan policies and site allocations on European sites. Green categories record that there are unlikely to be significant effects (and therefore appropriate assessment is not required). Amber categories record that there are likely to be significant effects, or uncertainty remains as to whether there will be likely significant effects (and therefore appropriate assessment is required).

5.2 Potential Impacts of the SIR Local Plan on European Sites

5.2.1 The provisions for growth and new development in a full Local Plan has the potential to generate a range of impacts that, depending on their nature, magnitude, location and duration, can potentially significantly impact on European sites. Most potential impact pathways are associated with 'broad quantum of development' or 'population growth' aspects of a Local Plan.

5.2.2 The main ways by which a Local Plan could impact on European sites are through individual allocations of land for development that are directed to a specific location; through in combination effects resulting from the cumulative impacts of development associated with a Local Plan and with the plans and programmes of external authorities.

5.2.3 The main possible pathways or categories of effect arising from a Local Plan are therefore:

Broad Category of Potential Effects on European Sites	Examples of Activities Resulting in Impacts
Habitat loss/ fragmentation (including loss of functionally linked land) and effects on species away from European Sites	<ul style="list-style-type: none"> • Loss of on-site habitat within European site boundary as a result of direct land take; • Loss of off-site, functional habitat outside of European site boundary as a result of direct land take; • Habitat fragmentation/loss of connectivity. • Species mortality (for example, due to collision risk)
Public access and disturbance: recreation and visitor pressure	<ul style="list-style-type: none"> • Potential for direct damage to habitats from trampling and erosion; • Potential for increased disturbance to species from larger footfall of people and dogs. Impacts will depend on scale, type and predictability of disturbance. Certain species, when breeding and foraging, are particularly sensitive; • Eutrophication from dog fouling; • Spread of invasive species.
Disturbance: urbanisation effects	<ul style="list-style-type: none"> • Noise, vibration, light pollution, both from construction activity and once development is occupied; • Fly-tipping of garden waste can lead to spread of invasive species; • Predation from domestic cats; • Vandalism and anti-social behaviour; • Increased risk of fire.
Hydrological: Changes in water levels and flows	<ul style="list-style-type: none"> • Potential for drying and reduced water levels arising from increase in water abstraction levels to provide supply (e.g. new housing). Changes to water levels can impact on river flow and water quality; • Flooding/storm water; • Potential impact on groundwater in water cycle by buildings altering groundwater flow.

<p>Hydrological: Changes in water quality</p>	<ul style="list-style-type: none"> • Potential increase in pressure on sewage infrastructure network and capacity; • Potential increase in volume of waste water discharges (consented) which can lead to reduced water quality; • Hydrological cycle impacts from additional take up of land, loss of permeable surfaces and topography alteration, potentially resulting in flood risk and water quality impacts; • Potential increase in accelerated run off arising from new hard standing/non-permeable surfaces of new development; • Potential increase in surface water run off as a result of new development, which can lead to contamination of watercourse links and reduced water quality.
<p>Air pollution</p>	<ul style="list-style-type: none"> • Dust emissions (construction phase); • Increased traffic movements and trips arising from construction and once development is occupied, leading to increased air emissions which could damage vegetation and harm species sensitive to changes in air quality; • Potential for increased emissions from buildings.

In-combination effects

5.3.1 As well as considering whether the SIR Local Plan policies alone may result in likely significant effects, a key requirement of the Regulations is to determine whether the SIR Local Plan is likely to have a significant effect when considered in-combination with other plans and projects. For example, the effect of a plan on air quality may be insignificant when considered alone, but when combined with the effects of increased air pollution from other plans, may lead to significant impacts on site integrity. Regulation 105 of the Regulations requires an appropriate assessment of “*any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or project.*”

5.4. Appropriate Assessment

5.5.1 Should it not be possible at Stage 1 Screening to conclude that there will be no likely significant effects on European sites as a result of the Local Plan, it will be necessary to undertake a Stage 2 Appropriate Assessment.

6 Stage 1 HRA Screening Assessment and Conclusions

6.1 Stage 1 Screening

- 6.1.1 A screening assessment has been undertaken to identify the likely significant effects of the policies and proposals within the SIR (Regulation 19) publication draft Local Plan.
- 6.1.2 The SIR has only 1 main element to it, that being an updating of the policy GROWTH 1, and specifically the housing requirement figure within that policy. The proposed updated housing requirement figure has been tested against the level of commitments of housing growth already (i.e. sites with planning permission or sites allocated in the 2015 Local Plan or subsequent adopted Neighbourhood Plans).
- 6.1.3 It is demonstrated in the SIR that the quantum of housing proposed (the new housing requirement figure) is lower than the quantum of housing already committed (i.e. housing that is anticipated to be delivered with or without the SIR progressing to adoption). It is therefore proposed in the SIR that no further new site allocations be proposed, meaning no additional growth will arise as a consequence of the SIR.
- 6.1.4 The development provided for under those committed sites has already been subject to assessment under the Habitat Regulations at the project stage, including consultation with Natural England as the statutory conservation body. There is therefore no requirement to re-assess such commitments, because they have already been found to be acceptable by the relevant local planning authority as the competent authority, at a project level. In any event, even if they were ‘reassessed’ and such an assessment concluded potential for significant effects, the committed sites could be progressed in any event, with or without the proposals in the SIR. Any reassessment is therefore not only necessary, but would be a futile exercise if undertaken.
- 6.1.5 The same reasons above equally apply when considering the SIR in combination with other plans and projects.
- 6.1.5 The following table summarises the assessment:

Proposal	Potential for LSE	Screening Conclusion	Notes
Policy GROWTH1 (as to be amended by the SIR)	This policy, inter alia, sets out the housing requirement for East Cambridgeshire during the plan period 2011-2031. The SIR proposes to update the housing requirement. The updated figure leads to no new site allocations being required or proposed.	N1	Because the amended policy leads to no additional growth, and in affect is therefore just a general policy statement

- 6.1.6 Overall, therefore, it is the opinion of the Local Planning Authority that the SIR Local Plan, alone or in combination with other plans and projects, is unlikely to have any significant effects on any of the applicable protected sites.