

Strategic Environmental Assessment and Habitats Regulations Assessment Screening Report

March 2020

Draft SCREENING OPINION

SEA

Having taken all of the relevant policies of the draft Highampton Neighbourhood Plan (Submitted Plan 6v1:11th February 2020) into account, and assessed the potential environmental impact on designated sites and landscapes, it is the Council's opinion that a full SEA is not required for the Neighbourhood Plan, due to the limited nature of development proposed and the continuity in land use. The full reasons for this conclusion are set out in the screening report in Appendix 1.

HRA

Due to geographical separation of Highampton from European Sites and accordingly the absence of impact pathways, and against a backdrop of a limited amount of development proposed, the Council considers that the Highampton Neighbourhood Plan will not have any likelihood of significant effect on a European site alone or in-combination with other development and that therefore further assessment under the Habitats Regulations is not required. The full reasons are set out in Appendix 2 of this report.

NB. This is a draft screening opinion, subject to consultation with the statutory bodies. A determination has not yet been made under regulation 9(1) of the Environmental Assessment of Plans and Programmes Regulations 2004.

Summary

SEA

This statement has been produced to comply with Regulation 15(1) e (ii) of the Neighbourhood Planning (General) (Amendment) Regulations 2015.

A neighbourhood plan is required to meet a number of basic conditions, one of which being it must not breach, and must be otherwise compatible with EU and Human Rights obligations. This requires neighbourhood plans to fully consider the requirements of the SEA regulations which transpose the EU's SEA Directive into law and which requires those making plans that could impact on the environment to consider whether they are likely to have a significant effect or not.

A Strategic Environmental Assessment (SEA) Screening Opinion was prepared by West Devon Borough Council for the Highampton Neighbourhood Plan (see Appendix 1). The statutory environmental bodies (Natural England, Historic England and Environment Agency) were consulted on 31st March 2020.

Having taken all of the relevant policies of the draft Neighbourhood Plan into account, and assessed the potential environmental impact on designated sites and landscapes, it is the Council's opinion that a full SEA is not required for the Highampton Neighbourhood Plan. The reasons for this conclusion are set out in the screening report in Appendix 1.

HRA

The legislative basis for the **Habitats Regulations Assessment (HRA)** is EU Habitats Directive Article 6(3) and Regulation 61 of the Conservation of Habitats and Species Regulations 2010 (as amended).

The 'Natura 2000 network' (more commonly referred to as 'European Sites') of sites are designated for the importance of habitats, species and birds (under the 'Habitats Directive' for Special Areas of Conservation, and the 'Birds Directive' for Special Protection Areas). The designation of European Sites was intended to provide legal protection for this flora and fauna of a European importance, requiring their maintenance or restoration in a favourable condition.

The process of HRA encompasses the requirements of the Habitats Directive and Habitats Regulations, and includes a decision on whether the plan (including Neighbourhood Plans) should be subject to appraisal. The 'screening' process is used to consider whether the plan would be likely to have significant effects on a European Sites, and if so whether an 'appropriate assessment' is necessary.

Due to the geographical separation of Highampton from European Sites and accordingly the absence of impact pathways, and against a backdrop of a limited amount of development proposed, the Council considers that the Highampton Neighbourhood Plan will not have any likelihood of significant effect on a European site alone or in-combination with other development and that therefore further assessment under the Habitats Regulations is not required. The full reasons are set out in Appendix 2 of this Screening Opinion.

Consultation

Consultation with the three Statutory Consultees was carried out on 31st March 2020. These will be included in the final document once received.

Appendix 1

Highhampton Neighbourhood Plan

Strategic Environmental Assessment Screening Opinion

1.1 - Strategic Environmental Assessment (SEA) Process

The need for environmental assessment of plans and programmes is set out in the EU Directive 2001/42/EC, this was transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004 or SEA Regulations. The Localism Act 2011 requires neighbourhood plans to comply with EU legislation, although not all neighbourhood plans will require full environmental assessment, depending on what they propose and what effect this might have on the environment.

The Neighbourhood Planning Regulations (General) 2012 as amended in January 2015 require qualifying bodies to submit to the LPA with their neighbourhood plan either a SEA report or a statement of reasons as to why this has not been necessary (Regulation 15(1)e). The latter will only be appropriate where the neighbourhood plan has been assessed using the criteria referred to in Regulation 9 (1) of the Environmental Assessment of Plans and Programmes Regulations 2004; and where this assessment has shown that the neighbourhood plan is plan proposal is unlikely to have significant environmental effects. The 'Regulation 9' criteria are set out in Schedule 1 as follows:

1. The characteristics of plans and programmes, having regard, in particular, to—
 - (a) the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;
 - (b) the degree to which the plan or programme influences other plans and programmes including those in a hierarchy;
 - (c) the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;
 - (d) environmental problems relevant to the plan or programme; and
 - (e) the relevance of the plan or programme for the implementation of Community legislation on the environment (for example, plans and programmes linked to waste management or water protection).

2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to—
 - (a) the probability, duration, frequency and reversibility of the effects;
 - (b) the cumulative nature of the effects;
 - (c) the transboundary nature of the effects;
 - (d) the risks to human health or the environment (for example, due to accidents);
 - (e) the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);
 - (f) the value and vulnerability of the area likely to be affected due to—
 - (i) special natural characteristics or cultural heritage;
 - (ii) exceeded environmental quality standards or limit values; or
 - (iii) intensive land-use; and
 - (g) the effects on areas or landscapes which have a recognised national, Community or international protection status.

As part of its duty to support neighbourhood plans, West Devon Borough Council agreed to undertake the screening process to determine whether the Highhampton Neighbourhood Plan is likely to have significant environmental effects, and consequently whether SEA is required.

1.2. Highampton and environmental constraints in the Neighbourhood Plan Area

The Neighbourhood Plan Area covers Highampton Parish in West Devon Borough, Devon. Highampton is a largely rural parish with a population of around 322 (2011 Census). The Plymouth & South West Devon Joint Local Plan (JLP) identifies the small settlement of Highampton as a 'Sustainable Village' (Policy TTV25) with an indicative level of 20 new houses to be provided over the period of the JLP.

Highampton Parish contains part of a Site of Special Scientific Interest at Hollow and Odham Moor one of the largest continuous areas of Culm Grassland which forms part of the Culm Grassland SAC. Also situated in the Highampton Parish are the adjacent SSSIs at Ribson and Coombe Meadows noted for their herb-rich grassland.

1.3. Highampton Neighbourhood Plan

The Highampton Draft Neighbourhood Plan (the Plan) sets out policies and approaches which will add local detail to policies within the Joint Local Plan. The Plan sets out a vision for Highampton as follows:

To formulate and programme a plan for future growth and development that will integrate with the existing village and surrounding countryside and make a positive contribution to the community and its continued sustainability.

The Plan contains thirteen policies as summarised in the table below.

Table 1. Summary of policies in the Plan

Policy	Summary of aims and key environmental effects
<p>HNPH1</p> <p>Land comprising approx. 1.2ha at HNP HS1 as identified on the plan is allocated for the development of a minimum of 14 residential dwellings together with related community facilities. The development shall include:</p> <ul style="list-style-type: none">• A minimum of 14 new homes, designed and built to eco-standards, including at least 4 affordable homes.• A mixture of two and three bedroom semi-detached and terraced dwellings.	<p>Allocates a 1.2 ha site for the development of a minimum 14 dwellings.</p> <p>The site lies within the settlement of Highampton and relates well to villages built form. Policy HNPH 1 linked to other policies in the Plan seek to mitigate the environmental effects of this development.</p>

<ul style="list-style-type: none"> • A single vehicular access from Church Road to serve the whole development. • An area of land suitable for outdoor recreational use with a minimum area of 0.3 ha. <p>A masterplan for the site will be required, prepared in consultation with the local community, showing how the whole of the development can be safely and satisfactorily laid out and delivered. Development shall not commence until that masterplan has been approved in writing by Highampton Parish Council and the local planning authority.</p> <p>The development of the site to be in accordance with a Development Brief (Appendix 9) and the requirements of Policy HNPH4</p>	
<p>HNPH2</p> <p>There will be a presumption against development outside of the defined settlement boundary.</p>	<p>The Plan identifies a settlement boundary. This policy sets a presumption against development outside that boundary.</p>
<p>HNPH3</p> <p>All sites for development must provide for an appropriate mix of dwelling types and sizes, including</p>	<p>This policy seeks to ensure that housing development that takes place in the Parish meets local need.</p>

<p>affordable housing to meet the needs of all sectors of the community.</p>	
<p>HNP4</p> <p>The design and layout of housing in locations which are considered acceptable and meet other relevant policies of this Plan should:</p> <ul style="list-style-type: none"> • reflect the character of the area in which it is located; • where appropriate utilise natural local materials consistent with other buildings in the locality that harmonise with the existing rural character of the area; • be of a scale and appearance that integrates into the existing development within the village; • retain important natural features including trees, hedges and verges and include proposals to enhance the landscaping of the site and improve biodiversity; • not have an unacceptable impact on neighbouring properties through loss of amenities, noise or light pollution; • be designed and constructed to high levels of 	<p>.</p> <p>This Policy sets out criteria aimed to offset the environmental effects of development and retain the character of the Parish.</p>

<p>sustainability that aim for zero levels of carbon emissions.</p>	
<p>HNP5 Development should ensure that all vehicles can enter and leave the site from the existing highway in a forward direction.</p>	<p>This policy seeks to ensure vehicular activity arising from development can be accommodated safely.</p>
<p>HNP6 Parking provision will be required for each property on the basis of:</p> <ul style="list-style-type: none"> • 1 space for one-bedroom dwellings; • 2 spaces for two and three bedroom dwellings; • 3 spaces for dwellings of four bedrooms and above. <p>In addition, dwellings with direct access from existing roads will be required to make additional provision for visitor parking.</p>	<p>This policy defines parking provision that should accompany development.</p>
<p>HNP7 All relevant new development should, where possible, provide a refuge for pedestrians either as part of the site layout or, by contribution, on other principal routes within the</p>	<p>This policy seeks to ensure that development takes account of and where possible contributes towards pedestrian safety.</p>

<p>village.</p>	
<p>HNPE1</p> <p>Proposals for small scale employment development will be favourably considered provided that they:</p> <ul style="list-style-type: none"> • are appropriately located in relation to the existing residential areas and road network; • be of a scale and appearance that integrates into the existing development within the parish; • do not have an unacceptable impact on neighbouring properties through loss of amenities, noise or light pollution; • reflect the character of the area in which it is located; • where appropriate utilise natural local materials consistent with other buildings in the locality that harmonise with the existing rural character of the area; • retain important natural features including trees, hedges and verges and include proposals to enhance the landscaping of the site and improve biodiversity; • be designed and constructed to high levels of sustainability that aim for zero levels of carbon emissions; 	<p>This policy seeks to encourage employment development whilst offsetting any environmental effects that may result.</p>

<ul style="list-style-type: none"> • do not generate unacceptable vehicle movements given the restrictions of the existing road network; • provide sufficient off-road space for any loading, unloading and any parking for all employees and potential customers. In no circumstances should any development rely the future use of on-road parking, loading or unloading at any time. 	
<p>HNPE2</p> <p>Proposals for diversification of agricultural use will be supported provided that they:</p> <ul style="list-style-type: none"> • retain and support the existing agricultural use; • are appropriately located in relation to the existing residential areas and road network; • do not adversely impact the environment by generating noise, air pollution or loss of landscape and natural environment; • retain the essential rural character of the Parish and 	<p>This policy seeks to encourage diversification of agricultural uses whilst setting criteria which seek to limit environmental effects.</p>

<ul style="list-style-type: none"> • do not generate unacceptable vehicle movements given the restrictions of the existing road network • In other respects meet the requirements of Policy HPPE1 where appropriate. 	
<p>HNPE3 Proposals for the redevelopment of, or change of use of, existing employment land or premises will not be permitted if it results in a net loss of jobs.</p> <ul style="list-style-type: none"> • <input type="checkbox"/> Unless it has been demonstrated that the existing use or an alternative employment use is no longer viable. • In order to demonstrate the non-viability of any employment use it is a requirement that the business and premises has been shown to have been actively marketed for employment use for a period of at least 12 months • Proposals for the redevelopment of, or 	<p>This policy seeks to protect existing employment land/uses against unacceptable changes of use.</p>

<p>change of use of, existing employment land or premises will not be permitted if it results in a net loss of jobs.</p>	
<p>HNPR1 At least 0.3ha of land suitable for outdoor recreational use will be identified and developed within the allocation for residential development under Policy HNPH1. Details of the development and provisions for future ownership and maintenance as a Local Green Space will be the subject of an agreement between the developer and Highampton Parish Council.</p>	<p>This Policy seeks to protect an area of at least 0.3ha of land associated with the development proposed under policy HNPH1 as Local Green Space for future public use.</p>
<p>HNPR2 Proposals for the change of use of agricultural or amenity land to open space, sport or recreational use will be supported provided the proposal will make a positive contribution to the wellbeing and social needs of the local community and would not prejudice the existing related agricultural use.</p>	<p>This policy seeks to encourage the provision of Public Open Space in the Highampton Parish whilst safeguarding against prejudicing agricultural use.</p>
<p>HNPEN1</p>	<p>This Policy sets out criteria against which development proposals will be considered and</p>

<p>Development proposals within the Parish should demonstrate that the following landscape design principles and environmental safeguards are met as and where applicable:</p> <ul style="list-style-type: none"> • the scale, form and character of the existing settlement is maintained; • new development is of a scale to complement the traditional character of the village; • landscaping and boundary treatments use native species and, where practical and possible retain mature trees. However, where this is not possible, non-native species which are beneficial for wildlife will be acceptable alternatives; • the landscape character and residents' amenities are protected from any noise, light or other pollution; <ul style="list-style-type: none"> • existing local habitats and wildlife corridors are identified, protected and new ones created where practical and possible; • environmental gain is included as set out in the Government's 25 year plan; 	<p>seeks to minimise environmental effects that could potentially result.</p>
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<ul style="list-style-type: none"> • the design and construction are to a high level of sustainability that aims for zero levels of carbon emissions; • the site, surrounding land and natural water courses are all adequately protected from air or water borne pollution. 	
<p>HNPHE1</p> <p>The historic environment must be preserved and enhanced. Proposals that affect the significance of heritage assets are to be judged on the scale of damage or loss to the Parish.</p>	<p>This policy seeks to preserve and enhance the historic environment and protect heritage assets from harmful effects.</p>

2.0. SEA Screening and Statement of Reasons

Table 2 below provides the screening determination of the need to carry out a full Strategic Environmental Assessment for the Highampton Neighbourhood Plan, including a statement of reasons for why this has not been considered necessary. The statutory consultees consisting of Natural England, Historic England and the Environment Agency will be consulted to ask for their comments.

Table 2: SEA screening

Criteria	Significant environmental effect?	Reason
1. The characteristics of plans and programmes, having regard, in particular, to—		
(a) the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;	NO	The broader policy framework is set by the NPPF and the Local Plan. The Highampton Neighbourhood Plan does not propose significant new development in addition to or in contradiction to the Local Plan.
(b) the degree to which the plan or programme influences other plans and programmes including those in a hierarchy;	NO	Neighbourhood plans should be taken into account by other proposed plans, including the Local Plan and JLP, but there are no plans or programmes that need to be in conformity with it. The Plan will therefore not significantly influence other plans and programmes.
(c) the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;	NO	The policies in the Highampton Neighbourhood Plan are not considered likely to have a significant environmental impact on the integration of environmental considerations. Any development proposed will be in accordance with environmental protection policies of the adopted Local Plan, the JLP and the National Planning Policy Framework (NPPF).
(d) environmental problems relevant to the plan or programme; and	NO	The Neighbourhood Plan area contains part of the Hollow/Odham Moor SSSI and the Ribson Meadow/Coombe Meadow SSSIs. The nature of the proposals in the Neighbourhood Plan are not

		considered likely to have significant effects on these SSSIs. See the HRA screening opinion below for more detail.
(e) the relevance of the plan or programme for the implementation of Community legislation on the environment (for example, plans and programmes linked to waste management or water protection).	NO	The Neighbourhood Plan is not relevant as a plan for implementing EC legislation.
2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to—		
(a) the probability, duration, frequency and reversibility of the effects;	NO	Any effects are considered to be minimal. Policies in the Plan that support new development also set out environmental criteria that would mitigate against the development.
(b) the cumulative nature of the effects;	NO	The effects from the Plan as a whole are not considered to be significantly greater than those from any individual policy.
(c) the transboundary nature of the effects;		The Plan will not have any transboundary effects.
(d) the risks to human health or the environment (for example, due to accidents);	NO	There are considered to be no risks to human health.
(e) the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);	NO	The Neighbourhood Plan area covers the parish of Highampton. The population of the Neighbourhood Area is approximately 322. This is considered to be a small area in terms of wider environmental effects
(f) the value and vulnerability of the area likely to be affected due to— (i) special natural characteristics or cultural heritage; (ii) exceeded environmental quality standards or limit values; or (iii) intensive land-use; and	NO	As discussed, the only vulnerable area which may be effected is considered to be the SSSIs, and any effects are likely to be minimal.
(g) the effects on areas or landscapes which have a recognised national, Community or international protection status.	NO	As above. In addition, the Plan contains policies which are likely to have a positive effect on the environment generally.

2.1 SEA Screening Opinion

The Highampton Neighbourhood Plan allocates a site for residential development (Policy HNPH1) aimed at fulfilling the indicative level of new housing identified in the JLP.

The site lies within the core of Highampton settlement. The criteria against which development will be considered is provided both generally and specifically in the actual policy and others included in the Plan providing for mitigation to protect against the effects of this development.

The criteria set out for development in the policies contained in the Highampton Neighbourhood Plan are likely to prove beneficial in terms of mitigating against any possible environmental impacts. As indicated above where development is actively encouraged, criteria are given to ensure adverse impacts will be minimised.

The listed buildings. Where development is proposed full recognition of ecological/heritage interest are highlighted and the need for mitigation identified.

No development is proposed that is likely to have any effect on the identified SSSIs, whilst the Neighbourhood Plan is likely to guard against any possible impacts on the built environment arising from development proposed.

HRA screening has been carried out which concluded that the Highampton Neighbourhood Plan will have no unacceptable impacts on any European designated sites

Having taken all of the relevant policies of the Highampton Neighbourhood Plan into account, and assessed the potential environmental impact on designated sites and landscapes, this screening opinion has concluded that a full SEA is not required.

Appendix 2

Highampton Neighbourhood Plan

Habitats Regulations Assessment: Screening

1.0. The HRA process

The legislative basis for the **Habitats Regulations Assessment (HRA)** is EU Habitats Directive Article 6(3) and Regulation 61 of the Conservation of Habitats and Species Regulations 2010 (as amended).

The 'Natura 2000 network' (more commonly referred to as 'European Sites') of sites are designated for the importance of habitats, species and birds (under the 'Habitats Directive' for Special Areas of Conservation, and the 'Birds Directive' for Special Protection Areas). The designation of European Sites was intended to provide legal protection for this flora and fauna of a European importance, requiring their maintenance or restoration in a favourable condition.

With respect to this HRA, all of the following designations, to which the HRA process applies, are referred to as 'European sites':

- **Special Areas of Conservation (SACs)** special protection to flora, fauna and habitats
- **Special Protection Areas (SPAs)** are areas of land, water or sea of international importance for the breeding, feeding, wintering or the migration of rare, vulnerable or migratory species of birds
- **Ramsar sites**, identified through the Convention on Wetlands of International Importance
- **Proposed and candidate SPAs and SACs** (pSPA, cSPA, pSAC, cSAC) that are being considered for designation

1.1. The HRA screening process for Neighbourhood plans

There are particular requirements for plans and projects set out within the European Directives (and transposed into domestic legislation in England by the 'Habitats Regulations').

The process of HRA encompasses the requirements of the Habitats Directive and Habitats Regulations, and includes a decision on whether the plan (including Neighbourhood Plans) should be subject to appraisal. The 'screening' process is used to consider whether the plan would be likely to have significant effects on a European Sites, and if so whether further assessment (termed Appropriate Assessment) is necessary.

An Appropriate Assessment will consider the implications for the European Site in view of the conservation objectives (generally to restore or maintain the features which led to the designation of the site), and consider whether the plan could affect the integrity of the site. More detailed mitigation measures may be considered at this stage. A plan should only be agreed once the competent authority has established that the plan will not adversely affect the integrity of the European Sites.

With respect to Neighbourhood Plans, the Neighbourhood Planning (General) Regulations 2012 require a submitted neighbourhood plan to include a statement explaining how the proposed Neighbourhood Plan meets the basic conditions set out in paragraph 8 of Schedule 4B of the Town and Country Planning Act

1990. One of the basic conditions requires Neighbourhood Plans to be compatible with EU obligations and to demonstrate that it is not likely to have a significant effect on a European Site.

The Habitats Regulations do not prescribe a specific methodology for undertaking or reporting the appraisal of plans, however there is guidance within various documents and the following are most relevant:

- ODPM Circular 06/2005
- *The Habitats Regulations Assessment of Local Development Document (David Tyldesley and Associates for Natural England – final draft 2009)*
- *Habitats Regulations Appraisal of Plans, Guidance for Plan-Making bodies in Scotland (David Tyldesley and Associates, 2012).*

As this Neighbourhood Plan is not directly connected with or necessary for the management of a European site for nature conservation purposes it must proceed through the HRA screening process.

2.0. Selecting European sites that should be considered in the HRA screening

The decision about which European Sites should be considered in the Appraisal is based upon the checklist below (*adapted from Figure 2 of HRA of Plans, David Tyldesley and Associates, 2012*).

- Sites within the plan area
- Sites upstream or downstream of the plan area in the case of river or estuary
- Wetland sites with relevant hydrological links to land within the plan area
- Sites which have significant ecological links with land in the plan area (e.g. migratory birds/mobile species)
- Sites which may receive increased recreational pressure from the plan
- Sites that may be used for water abstraction
- Sites that could be affected by discharge of effluent from waste water treatment
- Sites that could be affected by significant increases in emissions from traffic

2.1. Conservation Objectives

Natural England publish Conservation Objectives for each European site. Conservation Objectives are intended to assist competent authorities with meeting their obligations under the Habitats Regulations, providing a framework to inform HRA, in particular the Appropriate Assessment stage of HRA.

Where Conservation Objectives are met for the Qualifying Species, the site is considered to exhibit a high degree of integrity and to be achieving a Favourable Conservation Status for that species or habitat.

With regards to the European sites, natural habitats and/or species for which the site has been designated (the Qualifying Features):

- *Avoid deterioration of the qualifying natural habitats and the habitats of qualifying species, and the significant disturbance of those qualifying species, ensuring the integrity of the site is maintained or restored as appropriate and the site makes a full contribution to achieving Favourable Conservation Status of each of the qualifying features.*
- *Subject to natural change, to maintain or restore:*
 - *The extent and distribution of qualifying natural habitats and habitats of qualifying species;*
 - *The structure and function (including typical species) of qualifying natural habitats and habitats of qualifying species;*
 - *The supporting processes on which qualifying natural habitats and habitats of qualifying species rely;*
 - *The populations of qualifying species;*

- *The distribution of qualifying species within the site.*

EUROPEAN SITES THAT COULD POTENTIALLY BE AFFECTED BY THE HIGHAMPTON NEIGHBOURHOOD PLAN

WEST DEVON EUROPEAN SITES – Delete table as appropriate				
Site Name & Designation	Qualifying Interests	Site vulnerabilities	Potential effects associated with development	Likelihood of a Significant Effect from the Highampton Neighbourhood Plan
Dartmoor SAC	Northern Atlantic wet heath with <i>Erica tetralix</i> European dry heath Blanket bog Old sessile oak woodlands <i>Ilex</i> and <i>Blechnum</i> in the British Isles Southern damselfly <i>Coenagrion mercuriale</i> Otter <i>Lutra lutra</i> Atlantic salmon <i>Salmo salar</i>	Visitor and recreational pressure including accidental and deliberate burning, trampling and erosion particularly of blanket bog, disturbance of otters by activity on/near rivers Nutrient/acid deposition causing habitat loss Water quality – effect on Atlantic salmon and Otter	Increased recreational pressure resulting from new development Air pollution resulting from new development Increased water abstraction reducing river flow	The level of development proposed within the Highampton NP is minimal. Given the geographical separation of Highampton from Dartmoor SAC, and the variety of other recreational opportunities closer to Highampton, there is no likelihood of a significant effect from new residents associated with the development proposed in the Highampton NP. There will be no likelihood of significant effect from air pollution associated with any new development proposed in Highampton on the Dartmoor SAC.
Culm Grasslands SAC	Northern Atlantic wet heaths <i>Molinia</i> meadows Marsh Fritillary butterfly	The grassland is a result of human activity, and to survive it must continue to be managed. Traditional methods depend on rough summer grazing, selective burning and topping and no application of fertilizers. As this is not generally considered economic, agri-environment schemes are used to promote continuation of traditional management. The scheme has achieved a 95% uptake rate with owner-occupiers (Source – Natura 2000 Data Form, JNCC, 2011).	Development causing direct physical loss or damage of culm grassland inside SAC or beyond boundaries reducing potential for linked habitat across landscape. Loss or damage of habitat (through development) used by Marsh Fritillary nearby to Culm Grassland.	Given the physical distance and the limited development proposed in the Highampton Neighbourhood Plan there is no likelihood of significant effect upon the Culm Grasslands.

2.2 Criteria with which to screen the Neighbourhood Plan

The following table sets out criteria to assist with the screening process of policies and proposals within the Neighbourhood Plan to consider their potential effects on European Sites. Policies and proposals that fall within categories A and B are considered not to have an effect on a European Site and are not considered further within the HRA process. Policies and proposals that fall within categories C and D are considered further, including an in-combination consideration. If straightforward mitigation measures cannot be applied to avoid any significant effects, then any remaining policies and proposals that would be likely to have a significant effect on a European site, either alone or in combination must be taken forward to an Appropriate Assessment.

Category A: No negative effect	
A1	Options / policies that will not themselves lead to development e.g. because they relate to design or other qualitative criteria for development, or they are not a land use planning policy.
A2	Options / policies intended to protect the natural environment, including biodiversity.
A3	Options / policies intended to conserve or enhance the natural, built or historic environment, where enhancement measures will not be likely to have any negative effect on a European Site .
A4	Options / policies that positively steer development away from European sites and associated sensitive areas.
A5	Options / policies that would have no effect because no development could occur through the policy itself, the development being implemented through later policies in the same plan, which are more specific and therefore more appropriate to assess for their effects on European Sites and associated sensitive areas.
Category B: No significant effect	
B	An option or policy or proposal that could have an effect but would not be likely to have a significant (negative) effect because the effects are trivial or 'de minimis', even if combined with other effects.
Category C: Likely significant effect alone	
C1	The option, policy or proposal could directly affect a European site because it provides for, or steers, a quantity or type of development onto a European site, or adjacent to it.
C2	The option, policy or proposal could indirectly affect a European site e.g. because it provides for, or steers, a quantity or type of development that may be very close to it, or ecologically, hydrologically or physically connected to it or it may increase disturbance as a result of increased recreational pressures.
C3	Proposals for a magnitude of development that, no matter where it was located, the development would be likely to have a significant effect on a European site.
C4	An option, or policy that makes provision for a quantity / type of development (and may indicate one or more broad locations e.g. a particular part of the plan area), but the effects are uncertain because the detailed location of the development is to be selected following consideration of options in a later, more specific plan . The consideration of options in the later plan will assess potential effects on European Sites, but because the development could possibly affect a European site a significant effect cannot be ruled out on the basis of objective information.
C5	Options, policies or proposals for developments or infrastructure projects that could block options or alternatives for the provision of other development or projects in the future, which will be required in the public interest, that may lead to adverse effects on European sites, which would otherwise be avoided.
C6	Options, policies or proposals which depend on how the policies etc are implemented in due course, for example, through the development management process. There is a theoretical

	possibility that if implemented in one or more particular ways, the proposal could possibly have a significant effect on a European site.
C7	Any other options, policies or proposals that would be vulnerable to failure under the Habitats Regulations at project assessment stage; to include them in the plan would be regarded by the EC as 'faulty planning.'
C8	Any other proposal that may have an adverse effect on a European site, which might try to pass the tests of the Habitats Regulations at project assessment stage by arguing that the plan provides the imperative reasons of overriding public interest to justify its consent despite a negative assessment.
Category D: Likely Significant effect in combination	
D1	The option, policy or proposal alone would not be likely to have significant effects but if its effects are combined with the effects of other policies or proposals provided for or coordinated by the Joint Local Plan the cumulative effects would be likely to be significant.
D2	Options, policies or proposals that alone would not be likely to have significant effects but if their effects are combined with the effects of other plans or projects , and possibly the effects of other developments provided for in Our Plan as well, the combined effects would be likely to be significant.
D3	Options or proposals that are, or could be, part of a programme or sequence of development delivered over a period, where the implementation of the early stages would not have a significant effect on European sites, but which would dictate the nature, scale, duration, location, timing of the whole project, the later stages of which could have an adverse effect on such sites.

3.0. Highampton Neighbourhood Plan screening

Table 1: HRA Screening

Policy/ Proposal	Category (A,B,C,D)	Reason for category (unless clear)	Potential impacts on European sites	European sites affected	Mitigation required
Policy HNPH1	B	Housing allocation	Recreational pressures	Dartmoor SAC	None given scale and physical distance from the SAC
Policy HNPH1	B	Housing Allocation	Physical and ecological impacts	Culm Grasslands	None given scale and physical distance from the SAC

3.2. HRA CONCLUSION AND SCREENING OPINION

It is considered that due to geographical separation of Highampton from European Sites and accordingly the absence of impact pathways, and against a backdrop of a limited amount of development proposed, the Highampton Neighbourhood Plan will not have any likelihood of significant effect on a European site alone or in-combination with other development and that therefore further assessment under the Habitats Regulations is not required.

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