



North Somerset Council
Site Allocations Plan (Oct 2016)
Habitat Regulations Assessment



HABITATS REGULATIONS ASSESSMENT OF THE OCTOBER 2016 NORTH SOMERSET SITE ALLOCATIONS PLAN
PUBLICATION VERSION

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1.0 Introduction.

- 1.1 This report documents the Habitats Regulations Assessment (HRA) work which has been carried out on the North Somerset [Site Allocations Plan Publication Version](#) (SAP), The relevant regulations are the Conservation of Habitats and Species Regulations 2010, which relate to Articles 6(3) and (4) of the Habitats Directive.
- 1.2 Screening work has been undertaken. It considers whether policies in the SAP are likely to have significant effects (LSEs) on the integrity of European Sites having regard to their conservation objectives. Screening determines whether an Appropriate Assessment is necessary, under section 102 of the above regulations.
- 1.3 “European sites” are Natura 2000 sites. They include Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar sites, under the EC Birds and Habitats Directives. Screening has considered all four European Sites in North Somerset, (which were also considered in HRA of the North Somerset Core Strategy): Severn Estuary SAC, Mendip and Limestone Grasslands SAC, North Somerset and Mendip Bats SAC, and Avon Gorge Woodlands SAC. They are shown on a plan in Appendix C.
- 1.4 Consistent with the regulations, the screening exercise has taken account of whether significant effects are likely from individual policies in the SAP alone, and also whether in-combination effects are likely (taking account of possible cumulative effects of policies in the plan, and also potential effects of other plans and projects in combination with the SAP).
- 1.5 The HRA concludes that, with the appropriate mitigation measures identified in the HRA, the Plan would not have likely significant effects on the European sites; (see paragraph 9 below).
- 1.6 For reasons set out in Appendix A below, the HRA was prepared in stages and sent to Natural England for comment in two parts (firstly the parts just concerning three of the European sites, and later the full document including the parts concerning the fourth site, the Bats SAC, highlighted in purple italics.) Natural England fully agreed with the HRA’s conclusion of no likely significant effects in respect of the first three European sites, but later had specific comments regarding the Bats SAC, as set out in Appendix A. Nevertheless their comments were generally very positive. As explained in the HRA, the council has prepared guidance on development for the Bats SAC which would be applied, where appropriate, as mitigation against adverse impacts on bats. The guidance, close to being finalised, was sent to Natural England alongside the full HRA, to help their consideration of the HRA. Natural England’s response included the following: “whilst this guidance currently provides strong evidence that the Site Allocations Plan for North Somerset will not have a likely significant effect, until the guidance is confirmed by Natural England as adequate, we cannot confirm that the Plan will not have a likely significant effect”. The guidance that was sent to Natural England was very close to being finalised, and we hope that by the time the Examination into the Plan is held, the guidance will have been finalised and confirmed by Natural England to be adequate.

2.0 The Site Allocations Plan in relation to the North Somerset Core Strategy

- 2.1 A consultation draft version of the Site Allocations Plan was advertised for public consultation in March 2016. Following consideration of comments received the council has produced a revised [Site Allocations Plan Publication Version](#) (SAP), on which the HRA screening has been based. The SAP goes forward to 2026, and allocates sites in line with development requirements that have been determined through the Core Strategy. The SAP does not include development management policies, because they are contained in another plan [Development Management Policies Plan \(Sites and Policies Plan Part 1\)](#) which was adopted in July 2016. It includes an important policy, DM8, on nature conservation, which refers to the European sites. Application of this policy in determining planning applications would significantly reduce the likelihood of development proposals having adverse effects on European sites.
- 2.2 The Core Strategy has itself been subject to HRA screening at each stage of its evolution, such as the Consultation Draft and Publication stages, and when proposed changes to development levels have occurred. At each stage it was found that, with appropriate mitigation measures identified there would not be likely significant effects (LSEs) on the four European sites in North Somerset. This is important because significant levels of development were considered, including uplift in housing numbers for the district 2006-2026 to 20,985 dwellings. That level of housing requirement has been agreed for the district by the Secretary of State, so there is no need for further HRA of the Core Strategy, which has been signed off by Natural England. The relevant report can be seen at [HRA of Core Strategy](#)
- 2.3 Because the Site Allocations Plan delivers the development requirements which have set by the Core Strategy, the HRA of the Core Strategy is relevant to, and has helped to inform the HRA of the SAP. However the HRA of the Site Allocations Plan is appropriately more detailed, notably in considering the potential effects of specific site allocations.
- 2.4 In particular the Core Strategy HRA considered air pollution issues, taking account of point source and traffic related pollution, and in-combination effects relating to those. The HRA concluded that with mitigation, there would not be likely significant air pollution effects from the Core Strategy, either alone or in combination with other plans and projects. Thus the HRA of the Site Allocations Plan has not needed to re-explore this issue. The mitigation included implementation of measures to promote non-car travel modes as promoted in relevant Core Strategy policies, and sustainable transport policies in the [Bristol Core Strategy](#) and West of England Joint Local Transport Plan. (Note: the latest version of the latter can be seen at [Joint Local Transport Plan 3](#) ; it goes forward to 2026.)
- 2.5 Similarly the Core Strategy HRA considered water-related issues. It noted that there are significant safeguards through regulatory mechanisms to help ensure that there are no adverse effects on European sites relating to water quality. They include water companies' Water Resource Plans, the Environment Agency's Review of Consents Procedure and Environment Agency (EA) catchment

abstraction management strategies (CAMS). The Review of Consents Procedure requires the EA to review their existing consents for water resources (abstraction) water quality (discharges), and groundwater authorisations that may affect SAC or SPA sites, and where such a site might be significantly affected (alone or in combination with nearby permissions) an appropriate assessment is undertaken. Also the EA is required to do an appropriate assessment of the implications for NK2 sites when granting new consents for water abstraction. Taking account of such robust regulatory mechanisms the Core Strategy HRA concluded that the Core Strategy is unlikely to have significant effects on European sites regarding water abstraction. It was noted that the HRA of the former Draft South West Regional Spatial Strategy, which had proposed significantly higher levels of development than the Core Strategy, concluded that such mechanisms should avoid any adverse effects on a number of European sites including the Severn Estuary SAC, SPA and Ramsar.

- 2.6 In view of these findings, and particularly the robust regulatory mechanisms, it is unlikely that the Site Allocations Plan would have significant water-related effects on European sites.

3.0 **SCREENING FOR THE SEVERN ESTUARY SITE**

3.1 **Summary site description and issues in the Site Improvement Plan (SIP):**

3.2 Note: Qualifying features for the Severn Estuary Ramsar overlap with those of the SAC and the SPA. The qualifying features are provided in Appendix B below.

3.3 In summary the Severn Estuary site is a large estuary with extensive intertidal mud flats and sand flats, rocky platforms and islands. Saltmarsh fringes the coast backed by grazing marsh with freshwater ditches and occasional brackish ditches. The site is of importance during the spring and autumn migration periods for waders, as well as in winter for large numbers of waterbirds, especially swans, ducks and waders. The fish fauna is very diverse and the site also supports marine worms forming an important food source for waders and fish.

3.4 The site is of particular importance for migratory fish.

3.5 The Severn Estuary Site Improvement Plan (SIP) identifies a number of issues of which the ones most likely to relate to development is (1) public access/disturbance to wildfowl and (2) impacts of development. The identified measures for these are to 1) identify/reduce impacts of disturbance to birds and damage to habitats, and 2) inform strategic planning decisions to minimise impact of development. Account of those points has been taken below.

3.6 Screening matrices

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| Plan policy or proposal | Policy SA1 Housing allocations Indicates that residential sites of 10 or more units are shown on the Policies Map and Schedule 1, with any specific site-related requirements or key considerations to take into account. Also the schedule states that development on the sites will need to conform to the Core Strategy, Sites and Policies Plan Part 1 (Development Management Policies), relevant Supplementary Planning Documents and Neighbourhood Development Plans. The proposed housing sites adjacent to (within 10m of) the Severn Estuary site are: <u>Weston super Mare (WsM):</u> -Birbeck Pier site; no current planning consent, allocated for 50 dwellings; (housing part of mixed use site which includes Birbeck island itself, land on mainland including land at Birkett Road, Madeira Road. Claremont Crescent etc.) Area is already largely developed. Likely to include subdivision of existing properties. |
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| | <p>-the Royal Pier Hotel, already with planning consent, subject to legal agreement; 63 dwellings. The relevant application is 11/P/0006/F – erect a new building of between four and seven storeys accommodating 63 apartments, (and other uses). This site adjoins the Birnbeck Pier site.</p> <p><u>Clevedon:</u> -Royal Pier Hotel, Clevedon, with full planning consent, allocation carried over from the adopted NSRLP; 17 dwellings. The permission is for restoration, partial demolition, alteration, extension and conversion of the former Royal Pier Hotel, into 17 flats with associated parking provision.</p> <p>There are some other housing allocations within 100m of the Severn Estuary site (SPA/SAC), but they are all separated from the coast by other land uses or woodland etc. They are as follows:</p> <p><u>Weston super Mare</u></p> <p>-Phase 4 of the Dolphin Square redevelopment in Weston super Mare town centre, no current consent, 220 dwellings. About 65 m from the town beach and separated from it by roads and tourist attractions such as the pirate ship and seasonal 40m tall wheel;</p> <p><u>Clevedon</u> -the Highcliffe Hotel, Wellington Terrace, Clevedon, with full planning permission, (2/P/0430/F); 14 dwellings. About 50m from the coast and separated from it by woodland. The permission is for refurbishment of two villas and construction of a full height infill extension to accommodate a change of use from a hotel into 14 self-contained two bedroom apartments.</p> <p>Marine Hill House, Marine Hill, Clevedon, full planning permission, partly completed development (9 dwellings remaining to be provided). The relevant permission involves subdivision of a listed building to 8 flats, with one adjacent dwelling to remain, and construction of 5 new homes. The latter have already been completed. Separated from the coast by housing and a road.</p> <p>Clevedon Hall, Clevedon, full planning permission, under construction, 42 dwellings remaining to be provided. Separated from the coast by a road, bowling green, buildings, etc.</p> |
| <p>Without mitigation, might there be likely significant effects (LSEs), what sort? If</p> | <p>As indicated above the SIP for the site refers to public access/disturbance to wildfowl, and impacts of development as issues, and it is considered that the development sites need to be considered with that in mind.</p> |

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| <p>so, can the likely significant effects be mitigated, so there would not be LSEs?</p> | <p>The HRA of the Core Strategy identified potential for impact of development on the Severn Estuary site from disturbance of birds, possibly from noisy activities during construction such as piling on sites close to wading bird foraging zones, and from recreational pressures. However the Core Strategy HRA predicted that those impacts could be mitigated, by such means as 1) carrying out piling outside the winter months, thus avoiding the time when most birds are likely to be present; and 2) consideration of a strategic approach to visitor management, including appropriate zonation to protect undisturbed areas.</p> <p><u>Consideration of waterbird roost project</u> For the more detailed HRA of the Site Allocations Plan, the council has drawn on relevant information, notably the Severn Estuary High Tide Waterbird Roost Project (Brean Down to Clevedon) . It identifies a total of 35 wintering waterbird high tide roosts for the Severn Estuary site in four sectors between Brean Down/River Axe and the southern edge of Clevedon. However none are within close proximity of any of the above development sites. Maps show that the identified roost sites are in the following broad locations:</p> <p>sector 1) Brean Down to Anchor Head, incorporating Weston Bay and also the lower reaches of the River Axe. The roosts are mainly mixed waterbird high tide roost sites on the west side of the River Axe in Sedgemoor District, with some immediately east and south east of Brean Down at the mouth of the river, and others further south on the west river bank. However, one roost 1E is a wader high tide roost site on the east side of the river, near Uphill, by Slimbridge Farm.</p> <p>sector 2) Anchor Head to Sand Point, incorporating Sand Point. The roosts include mixed waterbird high tide roosts sites 2A and 2B immediately south of Sand Point, and a much larger (in area) roost 2C, west of Kewstoke (north of Worlebury Hill) which includes a large area gull high tide roost (2C.2) and a smaller wildfowl high tide roost site (2C.1).</p> <p>sector 3) Sand Point to the River Yeo There are fairly large (in area) mixed waterbird high tide roosts in Woodspring Bay east of Sand Point, at the mouth of the River Banwell, and also north of Wick Warth, with a wildfowl high tide roost further east. There is a gull high tide roost site immediately north east of Sand Point.</p> <p>sector 4) River Yeo to Clevedon Beyond the shore there is a very large (in area) gull high tide roost immediately south west of Clevedon off Gullhouse Point, and a still larger mixed waterbird high tide roost site further south west (west of Kingston Seymour near the mouth of the River Yeo). Closer to/along the shore near Kingston Seymour and the mouth of the River Yeo there are smaller wader high tide roost sites, and also smaller mixed waterbird high tide roost sites near Seawall Farm.</p> |
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Possible implications regarding housing allocations

Only three of the allocated sites referred to above are likely to include new build development (including redevelopment) as opposed to conversion/refurbishment, and are either not yet granted planning consent or not yet under construction. They (all at Weston super Mare) are: Birnbeck Pier and environs, the Royal Pier, and Phase 4 of Dolphin Square. All are previously developed land.

The closest of these allocations to an identified roost site is Birnbeck Pier and environs, (closely followed by the adjoining Royal Pier Hotel site) but the relevant roost (2C) is over 1km away. It is described as an area of open water in Sand Bay, which is typically dominated by black headed gulls and also supports small numbers of Larus gulls, but they are not relevant to this HRA as they are not SPA qualifying species.

However the study suggests that this roost site also supports one of the three SPA qualifying species (shelduck), and that it is assumed that it should be classified as SPA Priority Roost for that species for the purposes of the study. (There are high wintering populations of the qualifying species within sector 2, and the birds are distributed across one or two roost sites only.)

However, while the study identifies jet skiing and life boat manoeuvres in Sand Bay as potential sources of disturbance to waterbirds at Roost 2C, the activities tend to occur more frequently in the summer when waterbirds are present with less frequency and abundance, and any disturbance is not perceived to be significant. This, with the fact that the Birnbeck Pier and Royal Pier Hotel sites are over a kilometre away, suggests that they are unlikely to have likely significant effects (LSEs) on Roost 2C, nor on the other identified roost sites which are over 2km away.

The nearest of the identified roosts to the Dolphin Square site (WSM), is 1E, a relatively small (in area) roost on an area of sandflat at the mouth of the River Axe near Uphill, (sector 1 of the study), some 2.6km away. It is a wader roost site which typically supports small to moderate numbers of dunlin (a SPA qualifying species) and ringed plover and small numbers of sanderling on a more variable basis. However unlike a number of roosts in sector 1, it is not classified as a SPA Primary Roost, nor as a possible SPA Primary Roost, which may reflect the relatively lower numbers of birds supported which are of qualifying species, relative to the other roosts.

The study states that the presence of walkers, dogs and vehicles on the southern end of the beach at Weston Bay appears to disturb waders using Roost E1, and that when disturbed the birds typically take flight and depart the roost. However it is not considered that the Dolphin Square site alone, (some 2.6km away, much closer to the popular tourist/recreation town beach near the Grand Pier, and separated even from that beach by other uses as described above), would be likely to have significant effects with regard to this.

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| | <p>However, it is considered that some form of mitigation would be appropriate in case of possible cumulative effects from housing developments in WSM and Uphill as a whole regarding recreational disturbance on Roost E1. For example there is a housing allocation (Jackson Barstow House, Uphill) within 500m (crow fly) of Roost 1E, although it is a previously developed site in the midst of housing at Uphill village, and allocated for just 20 dwellings. Such mitigation would appropriately include consideration of visitor management, which might include provision of notice boards at the south end of the beach at Weston Bay, indicating the proximity of an important high tide roost for water birds and the need to keep dogs on leads between October and April.</p> <p>It is interesting that in Sedgemoor district a report on a housing site in that part of the Severn Estuary area recommended the following mitigation measures regarding potential bird disturbance: encouraging dog walkers to use a local park; prevention of access along a path running close to the estuary, and use of appropriate signage to discourage people accessing informal tracks; Source: HRA of Sedgemoor Core Strategy</p> <p>Conclusion: It is not considered likely that any of the housing allocations in policy SA1, individually, would have significant effects on the Severn Estuary site. While there might be potential for some cumulative effects concerning recreational disturbance, it is considered that, with the underlined mitigation measure below, it is unlikely that there would be significant effects on the SAC:</p> <p><u>Consideration of visitor management, which might include provision of notice boards at the south end of the beach at Weston Bay, indicating the proximity of an important high tide roost for water birds and the need to keep dogs on leads between October and April.</u></p> |
| Without mitigation, might there be some minor effects, but not significant? | No |
| Other comments | None |

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| Plan policy or proposal | Policy SA2 Settlement boundaries for towns, service and infill villages. Define area where development will be acceptable in principle, subject to detailed policies in plans. Extension of residential curtilage, including into countryside, permitted subject to no harm to character of surrounding area or amenities of adjoining occupiers. |
| Without mitigation, might there be likely significant effects, what sort? If so, can | No extension of settlement boundaries is proposed in the vicinity of the Severn Estuary site. No LSEs. |

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| the likely significant effects be mitigated, so there would not be LSEs? | |
| Might there be effects but not significant? | No |
| Other comments | None |

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| Plan policy or proposal | <p>Policy SA3 Mixed use sites These overlap with the residential sites of 10 or more units covered by policy SA1, and are on the same Schedule 1. Any specific site-related requirements or key considerations, and any other relevant policy considerations to be taken into account. The relevant mixed use sites to consider (within 100m of the Severn Estuary site and not yet under construction) are all already covered under policy SA1 above (Birnbeck Pier and Dolphin Square) so the points identified above in respect of that policy also apply regarding policy SA3.</p> |
| Without mitigation, might there be likely significant effects, what sort? If so, can the likely significant effects be mitigated, so there would not be LSEs? | <p>As for policy SA1 above. No LSEs predicted for individual site allocations. While there is a possibility of cumulative effects from mixed use developments in WSM as a whole, regarding recreational disturbance, these are mitigatable, with the following measures: <u>Consideration of visitor management, which might include provision of notice boards at the south end of the beach at Weston Bay, indicating the proximity of an important high tide roost for water birds and the need to keep dogs on leads between October and April.</u></p> |
| Might there be effects but not significant? | No |
| Other comments | None |

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| Plan policy or proposal | <p>Policy SA4 Business Development Allocates sites in Schedule 2 for new business development (B1,B2 and B8 uses). Only permits proposals for non B use classes on the sites where criteria are met, including where ancillary to main use, small scale, etc. Also the schedule states that development on the sites will need to conform to the Core Strategy, Sites and Policies Plan Part 1 (Development Management Policies), relevant Supplementary Planning Documents and Neighbourhood Development Plans.</p> |
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| Without mitigation, might there be likely significant effects, what sort? If so, can the likely significant effects be mitigated, so there would not be LSEs? | None of the allocated sites for business development are in close proximity to the Severn Estuary site, the nearest being the Marine View/Portishead Quays site, over 600m away in the middle of the Portishead urban area. It is not considered likely that the allocated sites would have significant effects (LSEs) on the Severn Estuary site. |
| Might there be effects but not significant? | No |
| Other comments | None |

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| Plan policy or proposal | Policy SA5 Safeguarding of existing employment sites Safeguards existing employment sites in Schedule 3 for business development (primarily B1,B2 and B8 uses). Only permits proposals for non B use classes on the sites where criteria are met, including ancillary to main B use, etc. The schedule states that development on the sites will need to conform to the Core Strategy, Sites and Policies Plan Part 1 (Development Management Policies), relevant Supplementary Planning Documents and Neighbourhood Development Plans. |
| Without mitigation, might there be likely significant effects, what sort? If so, can the likely significant effects be mitigated, so there would not be LSEs? | None of the safeguarded sites for business development front or are in close proximity to the Severn Estuary, the nearest being the Pizey Avenue/Knowle Road estates, Clevedon, over 280m away and in the Clevedon urban area. Also the sites are existing employment sites which are merely being safeguarded for that purpose, and new development is not being proposed. Therefore it is not considered likely that the policy would have significant effects (LSEs) on the Severn Estuary site. |
| Might there be effects but not significant? | No |
| Other comments | None |

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| Plan policy or proposal | Policy SA6 Restriction on change of use of land in existing economic use Only permits change of use of land in existing economic use where it can be demonstrated that criteria would be met, including that loss of the site would not harm the range or quality of sites available for business use, etc. |
| Without mitigation, might there be likely significant effects, what sort? If so, can the likely significant effects be mitigated, so there would not be LSEs? | New development is not being proposed. It is not considered likely that the policy would have significant effects (LSEs) on the Severn Estuary site. |
| Might there be effects but not significant? | No |
| Other comments | None |

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| Plan policy or proposal | Policy SA7 Local Green Space Prevents development which adversely affects designated Local Green Space, particularly regarding characteristics underpinning designation, such as beauty, historic importance, recreational value, tranquillity or richness of wildlife, except in very special circumstances. |
| Without mitigation, might there be likely significant effects, what sort? If so, can the likely significant effects be mitigated, so there would not be LSEs? | Protective nature of policy, and particularly reference to wildlife, suggests likely benefit to biodiversity where proposed Local Green Space is on a site of wildlife interest. In any case no proposed area of Local Green Space in the Plan affects the Severn Estuary site. (The only proposed area of Local Green Space affecting a European site is Uphill Hill, Uphill, which includes a component SSSI (Uphill Cliff) for the Mendip and Limestone Grasslands SAC.) No LSEs for Severn Estuary site. |
| Might there be effects but not significant? | No |
| Other comments | None |

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| Plan policy or proposal | Policy SA8 Undesignated Green Space States that within settlements planning permission will not be granted for development that unacceptably affects the value of undesignated green space making a worthwhile contribution to amenity and/or the townscape, character, setting and visual attractiveness of the settlement. |
| Without mitigation, might there be likely significant effects, what sort? If so, can the likely significant effects be mitigated, so there would not be LSEs? | Protective policy which in any case relates only to undesignated areas of green space within defined settlements. No European sites, or their component SSSIs, are within defined settlements. Being undesignated, the areas of green space which would be subject to the policy cannot be identified in advance. Whether a green space would be subject to the policy would only be determined at such time as planning applications are submitted and considered, and depend on whether the planning officer considers the site to make the “worthwhile contribution”. No LSEs. |
| Might there be effects but not significant? | No |
| Other comments | None |

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| Plan policy or proposal | Policy SA9 Strategic gaps Protective policy which only permits development within strategic gaps where the open or undeveloped character of the gap would not be significantly adversely affected, the separate identity and character of the settlements would not be harmed, and the landscape setting of the settlements would not be harmed. |
| Without mitigation, might there be likely significant effects, what sort? If so, can the likely significant effects be mitigated, so there would not be LSEs? | Protective policy not likely to have significant effects on a European site. In any case none of the proposed strategic gaps in the Plan affect European sites. No LSEs. |
| Might there be effects but not significant? | No |
| Other comments | None |

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| Plan policy or proposal | Policy SA10 Sites for community uses Allocates or safeguards land for community uses (facilities), as listed in schedule 5. |
| Without mitigation, might there be likely significant effects, what sort? | None of the proposed community facilities are located within European sites, the nearest to the Severn Estuary site being a replacement primary school site at Kewstoke, next to the village hall. While less |

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| If so, can the likely significant effects be mitigated, so there would not be LSEs? | than 100m from the Severn Estuary site, this proposed facility is separated from it by existing housing and a caravan park, and unlikely to have significant effects on the Severn Estuary site. No LSEs. |
| Might there be effects but not significant? | No |
| Other comments | None |

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| Plan policy or proposal | <p>Policy SA11 Weston super Mare town centre regeneration area Defines the extent of the town centre regeneration area on the Policies Map. States that a Supplementary Planning Document (SPD) will provide detailed guidance for the design and layout of development within the Town Centre.</p> <p>The draft Weston super Mare Town Centre Regeneration SPD is being advertised for public consultation until 12 December 2016. It encourages more people to live in the town centre. Its proposals include:</p> <ul style="list-style-type: none"> -regeneration of underused brownfield sites in a priority zone stretching from the railway station to the seafront, mainly for residential use; -managing traffic to create a core area that provides priority to pedestrians and cyclists, shared space schemes, and delivering a cycle-friendly town; - key development areas. They include: <ul style="list-style-type: none"> -three new major mixed use development sites: Station Gateway (including up to 500-600 dwellings, Dolphin Square (including about 220 dwellings); Walliscote Place (including approximately 70 dwellings); - Dorville House (20 dwellings); -Lynton House Hotel (41 dwellings); <p>former library and BT building (70 dwellings); Bayside Hotel (15 dwellings); the former TJ Hughes Building (18 dwellings).</p> |
| Without mitigation, might there be likely significant effects, what sort? | The proposed Weston town centre regeneration area comprises mainly previously developed land all within the urban area and settlement boundary of the town. It adjoins the sea front to the west, from Anchor Head in the north (south of Birnbeck Pier) to opposite Ellenborough Park in the south. All of the |

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| <p>If so, can the likely significant effects be mitigated, so there would not be LSEs?</p> | <p>key development areas identified in the draft SPD, including the major mixed use development sites, are previously developed land.</p> <p>As indicated above, the council has drawn on the Severn Estuary High Tide Waterbird Roost Project to help assess the likely impact of allocations in the Site Allocations Plan regarding Severn Estuary birds and potential for disturbance. However none of the key development areas in the town centre regeneration area, referred to above, are particularly close to the identified roosts. None are as close as the Birnbeck Pier and adjoining Royal Pier Hotel sites, considered under policies SA1 and SA3. Also one key development area, the Dolphin Square site, is already considered under those policies. The same issues and mitigation measures are relevant as covered under those policies.</p> <p>Therefore it is considered that, with the underlined mitigation measures identified below, it is unlikely that there would be significant effects from policy SA11 on the European site, including consideration of cumulative effects: <u>Consideration of visitor management, which might include provision of notice boards at the south end of the beach at Weston Bay, indicating the proximity of an important high tide roost for water birds and the need to keep dogs on leads between October and April.</u></p> |
| <p>Might there be effects but not significant?</p> | <p>No</p> |
| <p>Other comments</p> | <p>None</p> |

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| <p>Plan policy or proposal</p> | <p>Policy SA12 A370 corridor into Weston super Mare Requires that development proposals affecting and visible from a defined A370 corridor from the M5 to the town centre must contribute to the creation of a continuous coordinated high quality visual approach into Weston super Mare. Priority will be given to a landscaped boulevard approach with street trees supported by high quality design, siting, design and materials to create a corridor of high quality townscape and architectural interest.</p> |
| <p>Without mitigation, might there be likely significant effects, what sort?</p> | <p>This corridor is confined to a relatively restricted area within/adjoining the Weston urban area. While it extends westwards to within 100m of the Severn Estuary site, directly south of the Dolphin Square development site, like that site it is separated from the Severn Estuary by tourism developments (pirate</p> |

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| If so, can the likely significant effects be mitigated, so there would not be LSEs? | ship and seasonal 40m wheel). In any case the policy is seeking the enhancement of an existing corridor rather than new development. No LSEs. |
| Might there be effects but not significant? | No |
| Other comments | None |

3.7 Conclusion

3.8 Screening predicts, with appropriate mitigation as indicated (underlined) above, no LSEs on the Severn Estuary site from the policies in the Site Allocations Plan.

4.0 **SCREENING FOR THE MENDIP LIMESTONE GRASSLANDS SAC**

4.1 **Summary site description and issues in the Site Improvement Plan (SIP):**

4.2 The Mendip Limestone Grasslands SAC comprises two areas in North Somerset: Uphill Cliff, and Crook Peak to Shute Shelve Hill. The sites are located on the Carboniferous Limestone which forms much of the Mendip Hills. The SAC supports the largest area of CG1 *Festuca ovina - Carlina vulgaris* grassland in the British Isles, and also present is CG2 *Festuca ovina - Avenula pratensis* grassland. The site is exceptional in that it supports a number of rare and scarce vascular plants typical of the oceanic southern temperate and Mediterranean elements of the British flora. These include white rock-rose, Somerset hair-grass and honewort. Transitions to limestone heath occur on Crook Peak to Shute Shelve Hill.

Also present are caves and *Tilio-acerion* woodland, the caves being hibernacula for Greater horseshoe bat.

4.3 The SIP for the SAC identifies the following priorities and issues: 1. inappropriate scrub control; 2. change in land management (for which the counter measure advocated is “ensure stocking levels are maintained”; 3. disease; and 4 air pollution: impact of atmospheric nitrogen pollution, for which the counter measure advocated is “control and reduce the impacts of atmospheric nitrogen deposition”. The only issue which might be linked to new development (regarding traffic pollution) is the fourth, (air pollution) and this issue is considered in the matrices below.

4.4 Screening matrices

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| <p>Plan policy or proposal</p> | <p>Policy SA1 Housing allocations Indicates that residential sites of 10 or more units are shown on the Policies Map and Schedule 1, with any specific site-related requirements or key considerations to take into account. Also the schedule states that development on the sites will need to conform to the Core Strategy, Sites and Policies Plan Part 1 (Development Management Policies), relevant Supplementary Planning Documents and Neighbourhood Development Plans.</p> |
| <p>Without mitigation, might there be likely significant effects, what sort? If so, can the likely significant effects be mitigated, so there would not be LSEs?</p> | <p>The only SIP issue which has any potential link with housing development is air pollution, due to the possibility of traffic- related pollution.</p> <p>However, none of the proposed housing allocations in the Site Allocations Plan lie adjacent to (within 10m of) the Mendip Limestone Grasslands SAC component SSSIs. The nearest allocation, Jackson Burstow House, Uphill, is about 140m to the north of the Uphill Cliff component site. However that site is within the built-up area of Uphill, within its settlement limits, and separated from the SSSI by housing and a road. Also the site is proposed for just 20 dwellings and unlikely in itself to have significant effects on the SSSI.</p> <p>The nearest major allocation which includes housing to the SAC is Winterstoke Village (now called Haywood Village), one of the developing Weston Villages. In April 2016 it had a remaining capacity of 2,233 dwellings. However, work done on air quality for the Core Strategy HRA concluded that for the large housing developments considered (like Weston urban extension (Weston Villages)), the fact that they are generally located over 2km away from the nearest component site at Uphill Cliff means that significant impacts from nitrogen deposition from traffic are unlikely. The HRA looked at potential for in-combination effects of the Core Strategy policies with other plans or projects, and found that there could be increased air pollution if there is traffic growth on roads near the SAC (A38 and A371). However the Weston Villages are not near those roads. In any case the HRA concluded that, even regarding possible in-combination effects, <u>application of sustainable transport policies in the West of England Joint Local Transport Plan</u> would provide appropriate avoidance/ mitigation. (See link in paragraph 2.4 above).</p> <p>In view of this it is considered unlikely that there would be traffic-related significant effects on the SAC from housing allocations in the Site Allocations Plan.</p> |

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| | <p>The HRA of the Core Strategy identified the potential for housing development to impact on the Mendip Limestone Grasslands SAC having regard to the potential for recreational impacts from increased population, such as trampling, erosion, collection/digging, fires and litter. However, the HRA concluded that such impacts could be avoided by appropriate mitigation measures, such as: promotion of opportunities for informal recreation elsewhere on less sensitive sites through policies and proposals for provision of green infrastructure and public open space in local plans and Supplementary Planning Documents; promotion of interpretation boards encouraging restriction of walking to established public footpaths.</p> <p>However, it is noted that the Site Improvement Plan for the SAC by Natural England does not refer to recreational impacts. This suggests they may not be as significant as the Core Strategy HRA might imply.</p> <p>However, there are a number of housing allocations in Weston super Mare within 4km of the Uphill Cliff component site. Because there is a possibility that, in combination, they might together give rise to increased recreational impacts, it would be prudent to promote similar mitigation to that advocated by the Core Strategy, such as <u>promotion of interpretation boards encouraging restriction of walking to established public footpaths at the Uphill Cliff component SSSI</u>.</p> <p>Taking account of the above, with the mitigation measures (underlined) above, it is unlikely that there would be significant effects on the SAC from the housing allocations in policy SA1.</p> |
| Without mitigation, might there be some minor effects, but not significant? | No |
| Other comments | None |

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| Plan policy or proposal | <p>Policy SA2 Settlement boundaries for towns, service and infill villages. Define area where development will be acceptable in principle, subject to detailed policies in plans. Extension of residential curtilage, including into countryside, permitted subject to no harm to character of surrounding area or amenities of adjoining occupiers.</p> |
| Without mitigation, might there be likely significant effects, what sort? If | No extension of settlement boundaries is proposed in the vicinity of the Mendip Limestone Grasslands SAC (its component SSSIs). No LSEs. |

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| so, can the likely significant effects be mitigated, so there would not be LSEs? | |
| Might there be effects but not significant? | No |
| Other comments | None |

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| Plan policy or proposal | Policy SA3 Mixed use sites These overlap with the residential sites of 10 or more units covered by policy SA2, and are on the same Schedule 1. Any specific site-related requirements or key considerations, and any other relevant policy considerations to be taken into account. |
| Without mitigation, might there be likely significant effects, what sort? If so, can the likely significant effects be mitigated, so there would not be LSEs? | <p>The nearest mixed use site on Schedule 1 to a component SSSI is Winterstoke Village, one of the Weston Villages. However, it is mostly over 2km away from the component SSSI (the Uphill Cliff) and separated from it by existing and proposed development within the Weston urban area. The work done on air quality for the Core Strategy HRA found that, for the relevant policy on Weston Villages (CS30) there would not be likely significant effects on the SAC regarding impacts from traffic.</p> <p>However, there are a number of mixed use sites in nearby Weston super Mare, and there is a possibility that, in combination, they might together give rise to increased recreational impacts. Therefore, as with policy SA2 above, it would be prudent to promote similar mitigation to that advocated by the Core Strategy, such as <u>promotion of interpretation boards encouraging restriction of walking to established public footpaths at the Uphill Cliff component SSSI.</u></p> <p>With this mitigation it is unlikely that there would be LSEs on the SAC from the mixed use allocations in policy SA3.</p> |
| Might there be effects but not significant? | No |
| Other comments | None |

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| Plan policy or proposal | Policy SA4 Business Development |
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| | <p>Allocates sites in Schedule 2 for new business development (B1,B2 and B8 uses). Only permits proposals for non B use classes on the sites where criteria are met, including ancillary to main use, small scale, etc.</p> <p>Also the schedule states that development on the sites will need to conform to the Core Strategy, Sites and Policies Plan Part 1 (Development Management Policies), relevant Supplementary Planning Documents and Neighbourhood Development Plans.</p> |
| <p>Without mitigation, might there be likely significant effects, what sort? If so, can the likely significant effects be mitigated, so there would not be LSEs?</p> | <p>The nearest proposed employment site on Schedule 2 to a component SSSI is the 1.4ha Europark, an existing industrial site and residual allocation from the North Somerset Replacement Local Plan. It is mostly over 2km away from the relevant site, the Uphill Cliff, and separated from it by existing and proposed development within the Weston urban area.</p> <p>The next nearest is the 2.4ha Haywood Village Business Quarter, about 3.5km away (at one of the Weston Villages).</p> <p>Regarding air quality, the implications of the much larger Core Strategy proposal for the two Weston Villages, (which included employment development) was considered in the HRA of the Core Strategy. It was found that there would not be likely significant effects on the SAC regarding impacts from traffic.</p> <p>In view of these points it is not considered that there would be likely significant effects from policy SA4.</p> |
| <p>Might there be effects but not significant?</p> | <p>No</p> |
| <p>Other comments</p> | <p>None</p> |

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| <p>Plan policy or proposal</p> | <p>Policy SA5 Safeguarding of existing employment sites</p> <p>Safeguards existing employment sites in Schedule 3 for business development (primarily B1, B2 and B8 uses). Only permits proposals for non B use classes on the sites where criteria are met, including ancillary to main B use, etc. The schedule states that development on the sites will need to conform to the Core Strategy, Sites and Policies Plan Part 1 (Development Management Policies), relevant Supplementary Planning Documents and Neighbourhood Development Plans.</p> |
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| Without mitigation, might there be likely significant effects, what sort? If so, can the likely significant effects be mitigated, so there would not be LSEs? | The nearest safeguarded employment site on Schedule 3 to a component SSSI is Oldmixon Crescent, mostly over 1.3km away from the relevant site, the Uphill Cliff, and separated from it by existing and proposed development within the Weston urban area. It, like the other safeguarded sites for business development, is merely being safeguarded for that purpose, and new development is not being proposed. Therefore it is not considered likely that the policy would have significant effects (LSEs) on the SAC. |
| Might there be effects but not significant? | No |
| Other comments | None |
| Plan policy or proposal | Policy SA6 Restriction on change of use of land in existing economic use Only permits change of use of land in existing economic use where it can be demonstrated that criteria would be met, including that loss of the site would not harm the range or quality of sites available for business use, etc. |
| Without mitigation, might there be likely significant effects, what sort? If so, can the likely significant effects be mitigated, so there would not be LSEs? | New development is not being proposed. It is not considered likely that the policy would have significant effects (LSEs) on the SAC. |
| Might there be effects but not significant? | No |
| Other comments | None |

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| Plan policy or proposal | Policy SA7 Local Green Space Prevents development which adversely affects designated Local Green Space, particularly regarding characteristics underpinning designation, such as beauty, historic importance, recreational value, tranquillity or richness of wildlife, except in very special circumstances. |
| Without mitigation, might there be likely significant effects, what sort? If so, can the likely significant effects be mitigated, so there would not be LSEs? | Protective nature of policy, and particularly reference to wildlife, suggests likely benefit to biodiversity where proposed Local Green Space is on a site of wildlife interest. Uphill Hill, Uphill, which includes Uphill Cliff, a component SSSI for the SAC, is proposed as Local Green Space, and that protective designation is likely to reinforce the protection afforded to biodiversity on that site. |
| Might there be effects but not significant? | No |

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| Other comments | None |
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| Plan policy or proposal | Policy SA8 Undesignated Green Space States that within settlements planning permission will not be granted for development that unacceptably affects the value of undesignated green space making a worthwhile contribution to the townscape, character, setting and visual attractiveness of the settlement. |
| Without mitigation, might there be likely significant effects, what sort? If so, can the likely significant effects be mitigated, so there would not be LSEs? | Protective policy which in any case relates only to undesignated areas of green space within defined settlements, and no European sites, or their component SSSIs, are within such settlements. Being undesignated, the areas of green space which would be subject to the policy cannot be identified in advance. Whether a green space would be subject to the policy would only be determined at such time as planning applications are submitted and considered, and depend on whether the planning officer considers the site to make the “worthwhile contribution”. No LSEs. |
| Might there be effects but not significant? | No |
| Other comments | None |

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| Plan policy or proposal | Policy SA9 Strategic gaps Protective policy which only permits development within strategic gaps where the open or undeveloped character of the gap would not be significantly adversely affected, the separate identity and character of the settlements would not be harmed, and the landscape setting of the settlements would not be harmed. |
| Without mitigation, might there be likely significant effects, what sort? If so, can the likely significant effects be mitigated, so there would not be LSEs? | Protective policy not likely to have significant effects on a European site. In any case none of the proposed strategic gaps in the Plan affect European sites. No LSEs. |
| Might there be effects but not significant? | No |
| Other comments | None |

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| Plan policy or proposal | Policy SA10 Sites for community uses Allocates or safeguards land for community uses (facilities), as listed in schedule 5. |
| Without mitigation, might there be likely significant effects, what sort? If so, can the likely significant effects be mitigated, so there would not be LSEs? | None of the proposed community facilities are located within European sites, the nearest to the Mendip and Limestone Grasslands site (Uphill Cliff component SSSI) being a primary school site at Winterstoke Village, (one of the Weston Villages), but it is about 2.7km away. Also it is separated from the SSSI by existing and proposed development. No LSEs. |
| Might there be effects but not significant? | No |
| Other comments | None |

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| Plan policy or proposal | <p>Policy SA11 Weston super Mare town centre regeneration area Defines the extent of the town centre regeneration area on the Policies Map. States that a Supplementary Planning Document (SPD) will provide detailed guidance for the design and layout of development within the Town Centre.</p> <p>The draft Weston super Mare Town Centre Regeneration SPD is being advertised for public consultation until 12 December 2016. It encourages more people to live in the town centre. Its proposals include:</p> <ul style="list-style-type: none"> -regeneration of underused brownfield sites in a priority zone stretching from the railway station to the seafront, mainly for residential use; -managing traffic to create a core area that provides priority to pedestrians and cyclists, shared space schemes, and delivering a cycle-friendly town; - key development areas. They include: <ul style="list-style-type: none"> -three new major mixed use development sites: Station Gateway (including up to 500-600 dwellings, Dolphin Square (including about 220 dwellings); Walliscote Place (including approximately 70 dwellings); - Dorville House (20 dwellings); -Lynton House Hotel (41 dwellings); -former library and BT building (70 dwellings); -Bayside Hotel (15 dwellings); -the former TJ Hughes Building (18 dwellings). |
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| <p>Without mitigation, might there be likely significant effects, what sort? If so, can the likely significant effects be mitigated, so there would not be LSEs?</p> | <p>The proposed Weston town centre regeneration area comprises mainly previously developed land all within the urban area and settlement boundary of the town. It adjoins the sea front to the west, from Anchor Head in the north (south of Birnbeck Pier) to opposite Ellenborough Park in the south. All of the key development areas identified in the draft SPD, including the major mixed use development sites, are previously developed land.</p> <p>The regeneration area is relatively distant from all the component SSSIs for the Mendip Limestone Grasslands SAC, being over 2.4km from the nearest (the Uphill Cliff), and separated from it by housing and other development in the urban areas of Weston super Mare and Uphill. Therefore significant effects are unlikely.</p> <p>However, housing is proposed on various sites within the regeneration area, and there is a possibility that, in combination, housing allocations in the Plan might together give rise to increased recreational impacts on the SAC. Therefore it would be prudent to promote similar mitigation to that advocated by the Core Strategy, such as <u>promotion of interpretation boards encouraging restriction of walking to established public footpaths at the Uphill Cliff component SSSI</u>. However, it is noted that the Site Improvement Plan for the SAC by Natural England does not refer to recreational impacts. This suggests they may not be as significant as the Core Strategy HRA might imply.</p> <p>Taking account of the above, with the mitigation measures (underlined) above, it is unlikely that there would be significant effects on the SAC from the policy.</p> |
| <p>Might there be effects but not significant?</p> | <p>No</p> |
| <p>Other comments</p> | <p>None</p> |

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| <p>Plan policy or proposal</p> | <p>Policy SA12 A370 corridor into Weston super Mare Requires that development proposals affecting and visible from a defined A370 corridor from the M5 to the town centre must contribute to the creation of a continuous coordinated high quality visual approach into Weston super Mare. Priority will be given to a landscaped boulevard approach with street trees supported by high quality design, siting, design and materials to create a corridor of high quality townscape and architectural interest.</p> |
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| Without mitigation, might there be likely significant effects, what sort? If so, can the likely significant effects be mitigated, so there would not be LSEs? | This corridor is confined to a relatively restricted area within the Weston urban area. It is about 2.3km from the nearest component site at the SAC, (Uphill Hill) and separated from it by development/roads at Weston, a strategic gap, and then further development/roads at Uphill village. In any case the policy is seeking the enhancement of an existing corridor rather than new development. No LSEs. |
| Might there be effects but not significant? | No |
| Other comments | None |

4.5 Conclusion

4.6 Screening predicts, with appropriate mitigation as indicated (underlined) above, no LSEs on the Mendip Limestone Grasslands SAC site from the policies in the Site Allocations Plan.

5.0 SCREENING FOR THE NORTH SOMERSET AND MENDIP BATS SAC

5.1 Summary site description and issues in the Site Improvement Plan (SIP):

5.2 *An archipelago site, centred on the Mendip Hills, of highly variable component sites including the largest area of ancient woodland in the former county of Avon, Cheddar Gorge and surrounding sites, as well as caves, mines and buildings in the surrounding areas. The SAC as a whole supports 3% of the UK population of Greater horseshoe bats and internationally significant populations of Lesser horseshoe bats. The site also contains internationally important ravine woodland and calcareous grassland interest as supporting features of the bats and also in their own right.*

5.3 *In North Somerset the component sites for the SAC are the Brockley Hall stables (maternity roost) the Kings Wood and Urchin Wood SSSI (including a maternity roost), and caves at Banwell (including a bone cave) which are hibernation roosts.*

5.4 *The SIP for the SAC identifies the following priorities and issues:*

1. under grazing (that impacts on species rich grassland and foraging bats that rely on dung fauna as prey). The advocated action includes providing information and advice to land managers about appropriate management of calcareous grassland and foraging habitats for bats;

2. *planning permission general (concerns development on land between the component sites that could have an impact on bats through loss of foraging habitat, loss of minor roost sites, and disruption of flightpaths, the latter particularly through light pollution). The advocated action is to produce and promote advice and guidance on development control and strategic planning.*
3. *change to site conditions (relating to unstable mines at risk of collapse which may no longer be used by bats)*
4. *Forestry and woodland management (relating to excessive sycamore growth that may be threatening the species composition of important ravine woodland.)*
5. *Disease (ash die back); the SAC includes a high proportion of Ash woodland, and ash trees are used by commuting bats as linear features and feeding perches.*
6. *air pollution: impact of atmospheric nitrogen deposition. The advocated action is to further investigate this issue.*

5.5 Screening matrices

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| <p>Plan policy or proposal</p> | <p>Policy SA1 Housing allocations <i>Residential sites of 10 or more units are shown on the Proposals Map and Schedule 1, with any specific site-related requirements or key considerations to take into account. All allocations are expected to comply with other relevant policy considerations. Also the schedule states that development on the sites will need to conform to the Core Strategy, Sites and Policies Plan Part 1 (Development Management Policies), relevant Supplementary Planning Documents and Neighbourhood Development Plans.</i></p> |
| <p>Without mitigation, might there be likely significant effects, what sort?</p> | <p><i>The HRA of the Core Strategy identified the potential for housing development to impact on the North Somerset and Mendip Bats SAC (the Bats SAC), particularly having regard to artificial lighting and the sensitivity of the qualifying species (horseshoe bats) to it, and the potential loss of foraging area or</i></p> |

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| <p><i>If so, can the likely significant effects be mitigated, so there would not be LSEs?</i></p> | <p><i>disruption to commuting routes. However, the HRA concluded that such impacts could be avoided by appropriate mitigation measures, including such things as:</i></p> <ul style="list-style-type: none"> <i>- including references in the nature conservation policy of the appropriate Local Plan to the need for lighting schemes to avoid adverse impacts on light-averse wildlife. (That has been added to policy DM8 of the Development Management Policies Plan, which has now been adopted.)</i> <i>-promotion of retention of dark vegetated corridors within green infrastructure to form part of any large-scale development. (Provision of such corridors is proposed in the adopted SPD for the Weston Villages, for example.)</i> <i>-possible buffer zones with suitable habitat.</i> <i>-preparation of guidance on development relating to the Bats SAC, (which is in line with the Site Improvement Plan for the SAC).</i> <p><i>The Core Strategy HRA also refers to the fact that more detailed HRA of the Site Allocations Plan will occur.</i></p> <p><i>Work on guidance for the Bats SAC has progressed, in liaison with Natural England. It has been taken into account in preparing this HRA of the SAP.</i></p> <p><u><i>Key points in the emerging guidance for the Bats SAC</i></u></p> <p><u><i>Juvenile Sustenance Zones for bats</i></u></p> <p><i>The emerging guidance identifies Juvenile Sustenance Zones (JSZ) around bat maternity roosts, which are particularly sensitive. Juvenile horseshoe bats are highly dependent on cattle grazed pasture within these zones. The guidance states that for development proposals within the Juvenile Sustenance Zone it is essential that Natural England and the local planning authority are consulted at an early stage of the process as it is unlikely that new build development on green field sites would be acceptable, due to the critical nature of the area in supporting the population of a maternity roost.</i></p> <p><i>In North Somerset the JSZ have been identified in two areas:</i></p> <ol style="list-style-type: none"> <i>1. Straddling the A370 between Backwell and Cleeve, centred around the maternity roost at Brockley Hall Stables;</i> <i>2, Cleeve area, again straddling the A370, with the largest part south of that road. This JSZ is centred on a maternity roost at King's Wood.</i> |
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Bat Consultation Zone

The guidance identifies a Bat Consultation Zone indicating the area where horseshoe bats may be found. It is divided into three bands, A, B and C reflecting the proximity to maternity and other roosts and the density at which horseshoe bats may be found at a distance from a roost site.

Immediately around each of the maternity roosts at Brockley Hall stables, King's Wood (and, outside North Somerset, at Cheddar Gorge) there are inner circles (bands A). Moving further out are bands B and C. There are also many hibernation roosts in the district which have smaller bands B around them, and bands C around those. Due to the overlapping of the bands, band C covers most of the district.

Need for appropriate consultation, survey and mitigation

The guidance sets out guidelines for developers on the need for appropriate consultation on development proposals, and for appropriate survey and mitigation. The example extracts below give an idea of that:

(Part A)

6.2 Within the Bat Consultation Zone (all bands) developers must employ a consultant ecologist at an early stage to identify and assess any impacts.

6.3 For proposals within bands A and B of the Bat Consultation Zone, full season surveys will be needed (unless minor impacts can be demonstrated), and must include automated bat detector surveys. Survey results will be considered alongside any other relevant considerations, (such as calculations relating to replacement habitat), in determining mitigation requirements for development. (see Annex 5).

6.4 Within band C survey effort required will depend on whether commuting structure is present and the suitability of the adjacent habitat to support prey species hunted by horseshoe bats.

8.1 Within the Bat Consultation Zone (all bands), where SAC bats would be adversely affected or potentially adversely affected by development, (perhaps indicated by consultation and surveys) appropriate mitigation will be required.

8.2 The aim should be to retain and enhance existing habitats and features of value to bats such as those listed paragraph 3.2 of Part B of the guidance. Where this is not possible replacement habitat may be required. The council's ecologist will have regard to relevant considerations in determining the mitigation requirements, including survey results and calculations relating to quantity of replacement habitat. Developers' ecologists should carry out the calculations when requested by the council's ecologist. (See calculation methodology and formulae in Annex 5.)

(Part B)

4.4 Loss of habitat refers not only to physical removal but also from the effects of lighting. A development proposal will be expected to demonstrate that bats will not be prevented from using features by the introduction of new lighting or a change in lighting levels. Reference to specific lux levels will be expected. Lighting refers to both external and internal light sources. Applicants will be expected to demonstrate that considerations of site design, including building orientation; and the latest techniques in lighting design have been employed in order to, ideally, avoid light spill to retained bat habitats. Applicants will similarly be expected to demonstrate use of the latest techniques to avoid or reduce light spill from within buildings.

Consideration of the Plan's housing allocations in policy SA1 against the draft Bat guidance

None of the sites allocated in the Plan (for housing or other uses) are within the identified Juvenile Sustenance Zones (JSZs).

The nearest housing allocation in policy SA2 to a JSZ is the proposed site at Cobthorn Way, Congresbury. It is some 500m to the south west of the nearest area of JSZ which is around the maternity roost at King's Wood south of Cleeve.

The following gives the list of the allocated housing sites in order of proximity to the JSZs. It comments on whether they are within the Bat Consultation Zone, and if so, in which band.

Cobthorn Way, Congresbury, 54 dwellings, about 0.5km from JSZ. Within Bat Consultation Zone band A.

Moor Lane, Backwell, 65 dwellings, about 1.15km from JSZ. Within Bat Consultation Zone band A.

Uplands Nailsea, 100 dwellings, about 1.3km from JSZ. Within Bat Consultation Zone band B.

Venus Street, Congresbury, 14 dwellings, about 1.3km from JSZ. Within Bat Consultation Zone band B.

Engine Lane, Nailsea, 180 dwellings, about 1.4km from JSZ. Within Bat Consultation Zone band B.

Trendlewood Way, Nailsea, 30 dwellings, about 1.9km from JSZ. Within Bat Consultation Zone band B.

West End, Nailsea, 20 dwellings, about 2.1km from JSZ. Within Bat Consultation Zone band B.

Moor Road, Yatton, 80 dwellings, about 2.2km from JSZ. Within Bat Consultation Zone band B.

Yatton Station, Yatton, 21 dwellings, 2.2km from JSZ. Within Bat Consultation Zone band B.

Wemberham Lane, Yatton, 24 dwellings, 2.4km from JSZ. Within Bat Consultation Zone band B.

Oxford Plasma, Yatton, 51 dwellings, 2.4km from JSZ. Within Bat Consultation Zone band B.

Station Rd, Nailsea, 15 dwellings, 2.5km from JSZ. Within Bat Consultation Zone band B.

North End, Yatton, 170 dwellings, 2.5km from JSZ. Within Bat Consultation Zone, on boundary between bands B and C.

North West Nailsea, 450 dwellings, 2.5km from JSZ. Within Bat Consultation Zone, on boundary between bands B and C.

Police station, Nailsea, 40 dwellings, 2.5km from JSZ. Within Bat Consultation Zone band B.

Sycamore House, Nailsea, 30 dwellings, 2.6km from JSZ. Within Bat Consultation Zone band B.

Arnolds Way, Yatton, (Phase (2), 200 dwellings), 2.8km from JSZ. Within Bat Consultation Zone, band C, on edge of band B.

Pudding Pie Lane (East), 141 dwellings, Churchill, 3.1km from JSZ. Within Bat Consultation Zone, band C, very close to band B.

pudding Pie Lane (West) 35 dwellings, 3.3km from JSZ. Within Bat Consultation Zone, band C, very close to band B.

Says Lane, Churchill, 43 dwellings, 3.6km from JSZ. Within Bat Consultation Zone, band C, very close to band B.

In addition to the above sites there are proposed housing allocations at Clevedon. All are over 5km from the JSZs, the nearest being Yeoman's Farm (5.5km). While all are within the Bat Consultation Zone, they are in band C, with lowest likely density of horseshoe bats, and most are brownfield and already have planning permission.

They are as follows:

Highcliffe hotel (with planning permission, proposed for 14 dwellings), brownfield

Marine Hill House (with planning permission, proposed for 9 dwellings), brownfield

Royal Pier hotel (with planning permission, proposed for 17 dwellings), brownfield

Clevedon Hall (with planning permission, proposed for 42 dwellings), largely brownfield

North of Churchill Avenue allocated for 44 dwellings

Land at Byways, Strode Road (with planning permission, proposed for 13 dwellings); brownfield

Land at Millcross (allocated for 70 dwellings), brownfield

Land at Moor Lane Clevedon (allocated for 10 dwellings), brownfield

Yeolands Farm, Clevedon allocated for 15 dwellings

There are six housing allocations at Portishead of which only the three smallest are within the Bat Consultation Zone, all in band C, with one being brownfield. They are St. Joseph's RC School, (24 dwellings, brownfield), Elm Walk, Battens Orchards (10 dwellings), and south of Downside (23 dwellings).

There are two proposed housing allocations at Winscombe, but they are still further (over 7km) from the JSZ, and one, The Chestnuts, for 24 dwellings, has outline planning consent for housing. The other, Woodborough Farm, is for 175 dwellings. Both are within Bat Consultation Zone, band C.

There is one housing allocation at Banwell (off Wolverhill Road). It is 7.3km from the JSZ, in the Bat Consultation Zone, band C.

At Weston super Mare much of the town falls within the Bat Consultation Zone, (mainly band C), due to two hibernation roosts, one being in the north west part of the town, and one near Bleadon. This means that a number of urban housing allocations, (mainly previously developed land/ redevelopment sites) fall within the Bat Consultation Zone.

For example the sites include the gasworks, proposed for 240 dwellings, and a number of sites in/near the town centre, like Station Approach, proposed for 300 dwellings. The latter falls within Weston Regeneration Area, referred to in policy SA11 below.

However it is not predicted that, due to their brownfield nature and urban location, such developments are likely to significantly affect horseshoe bats. Nevertheless the process of following the Bats guidance would point to consultation and survey requirements, and where necessary, mitigation measures that might be appropriate.

There is a hibernation bat roost between Locking and Hutton which accounts for a small area of Bat Consultation Zone band B immediately around it, and a wider area of band C around that. The latter extends out to the south eastern edge of Weston, including the developing Weston villages (Haywood and Parklands), but they have planning permission and are well underway in terms of completions.

While the Weston villages are major developments (with remaining capacities at April 2015 of over 6,000 dwellings as at April 2015), and affect Bat Consultation Zone band C, the developments are progressing in line with an adopted Supplementary Planning Document (SPD) which includes specific measures to mitigate for any potential impact on bats. They include for example provision of dark corridors alongside important rhynes along which the bats forage. The measures were endorsed by Natural England, and are referred to in the HRA of the Core Strategy, as mentioned above.

*In infill villages and other settlements/countryside there are some allocations as follows:
Bleadon quarry, with planning permission, 42 dwellings. Brownfield. In Bat Consultation Zone, band C.*

Stowell concrete works, Kenn, allocated for 14 dwellings. Partly brownfield. Within Bat Consultation Zone band C.

Jackson Barstow House, Uphill, allocated for 20 dwellings. Brownfield. Within Bat Consultation Zone band C.

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| | <p><i>Barrow hospital, Barrow Gurney, planning permission, 43 dwellings. Brownfield. Within Bat Consultation Zone band C.</i></p> <p><i>Redwood Lodge, Failand, allocated for 167 dwellings. Brownfield. Within Bat Consultation Zone, band C.</i></p> <p><u>Analysis</u></p> <p><i>None of the housing allocations in policy SA2 is within a Juvenile Sustenance Zone (JSZ). The main potential for effects on horseshoe bats relates to the proposed housing allocations within the Bat Consultation Zone in bands A or B. They are mainly in and around the settlements of Yatton, Congresbury, Nailsea and Backwell. There are also some allocations at Churchill which are in band C but close to band B.</i></p> <p><i>As indicated above there are allocations in other settlements, including Weston super Mare, Clevedon, Portishead, Winscombe, Banwell, Bleadon, Barrow Gurney, Kenn, Uphill and Failand which are in band C of the Bat Consultation Zone. However in many of these (Bleadon, Banwell, Barrow Gurney, Kenn, Failand and Uphill) there are just single allocations, and most are at least partly brownfield. Similarly most of the allocations at Weston super Mare and Clevedon are brownfield, many already with planning permission. Regarding the largest allocation (major development at Weston Villages) the SPD has already covered bat mitigation requirements.</i></p> <p><i>As indicated above the Bats guidance refers to guidelines for developers on the need for consultation and surveys concerning development proposals, and also refers to mitigation requirements, including the possible need for replacement of habitat, depending on the proposal and its location.</i></p> <p><i>It is considered that <u>application of the guidance, together with application of relevant policies on nature conservation, such as policy DM8 of the Development Management Policies Plan</u> would ensure there is appropriate mitigation for any adverse effects on horseshoe bats. Therefore the housing allocations in policy SA1 should not have LSEs on the SAC.</i></p> |
| <i>Without mitigation, might there be some minor effects, but not significant?</i> | No |
| <i>Other comments</i> | None |

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| Plan policy or proposal | Policy SA2 Settlement boundaries for towns, service and infill villages. <i>Define area where development may be acceptable subject to detailed policies in plans. Extension of residential curtilage, including into countryside, permitted subject to criteria, including character of surrounding area.</i> |
| Without mitigation, might there be likely significant effects, what sort? If so, can the likely significant effects be mitigated, so there would not be LSEs? | <i>No LSEs. Some boundaries of settlements in the Plan are close to the component sites for the North Somerset and Mendip Bats SAC (hereon called the Bats SAC), an example being Congresbury with an eastern settlement boundary within 100m of the Kingswood and Urchin Wood SSSI. However those boundaries are well established having been carried over from the adopted North Somerset Local Plan, which was adopted in 2007. The Site Allocations Plan does not propose to bring those boundaries closer to the component sites.</i> |
| Might there be effects but not significant? | No |
| Other comments | None |

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| Plan policy or proposal | Policy SA3 Mixed use sites <i>These overlap with the residential sites of 10 or more units covered under policy SA2 above, and are on the same Schedule 1, with any specific site-related requirements or key considerations, and any other relevant policy considerations to take into account.</i> |
| Without mitigation, might there be likely significant effects, what sort? If so, can the likely significant effects be mitigated, so there would not be LSEs? | <p><i>As mentioned above, much of <u>Weston super Mare</u> is within the Bat Consultation Zone (mostly band C), including the Weston Villages, so it includes proposed mixed use sites like Dolphin Square, Birnbeck Pier, Station approach, land west of Winterstoke Road, (comprising sports pitches), and South of Herluin Way (the Avoncrest site formerly used for land fill), for example. However they are mostly on urban previously developed land, in band C. In view of this there is not a great likelihood that development of these sites would have significant effects on the SAC.</i></p> <p><i>The south east part of the town is not within the Bat Consultation Zone, so the greenfield Bridge Farm site is excluded from it.</i></p> <p><i>Weston villages (Haywood and Parklands Village) are covered under policy SA2 above, and the same points apply. Though major developments, they have planning permission and are well underway, and are progressing in line with the Weston Villages SPD which <u>includes specific mitigation measures relating to bats, including provision of dark corridors</u>. Therefore no LSEs are predicted.</i></p> |

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| | <p><i>The <u>Portishead Old Mill Road</u> site is outside the Bat Consultation Zone.</i></p> <p><i><u>Bleadon</u> quarry is a mixed use site with planning consent subject to legal agreement, and though in the Bat Consultation Zone, band C, the site was until recently used as a concrete works.</i></p> <p><i>Analysis</i> <i>It is not considered that the proposed mixed use sites have a great likelihood for potential significant effects. However in any case it is likely that <u>application of the Bats guidance together with application of relevant policies on nature conservation, such as policy DM8 of the Development Management Policies Plan</u> should ensure there is appropriate mitigation for any adverse effects on horseshoe bats. Therefore the mixed use allocations in policy SA3 should not have LSEs on the SAC.</i></p> |
| <i>Might there be effects but not significant?</i> | No |
| <i>Other comments</i> | None |

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| <i>Plan policy or proposal</i> | <p><i>Policy SA4 Business Development</i> <i>Allocates sites in Schedule 2 for new business development (B1,B2 and B8 uses). Only permits proposals for non B use classes on the sites where criteria are met, including ancillary to main use, small scale, etc.</i> <i>Also the schedule states that development on the sites will need to conform to the Core Strategy, Sites and Policies Plan Part 1 (Development Management Policies), relevant Supplementary Planning Documents and Neighbourhood Development Plans.</i></p> |
| <i>Without mitigation, might there be likely significant effects, what sort? If so, can the likely significant effects be mitigated, so there would not be LSEs?</i> | <p><i>At Weston super Mare the proposed employment sites include parts of the Weston villages (Haywood and Parklands Village) covered under policy SA2 above, and the same points apply. Though major developments, they have planning permission and are well underway, and are progressing in line with the Weston Villages SPD which includes specific <u>mitigation measures relating to bats, including provision of dark corridors.</u></i></p> <p><i>Outside the Weston villages, some of the proposed employment sites at Weston (like Weston Gateway south of A370 and Summer Lane north of A370) are in the south east part of the town, which is not</i></p> |

within the Bat Consultation Zone. While West Wick Business Park and the Europark are within it, (in band C), the former has planning consent and the latter is an existing industrial estate.

At Portishead, proposed employment sites at Gordano Gate and Marine View/Portishead Quays are outside the Bat Consultation Zone.

The Clevedon 5/20 Kenn Road Business Park/Yeo Bank and the Estune Business Park, Long Ashton allocations are in the Bat Consultation Zone, band C, but are residual areas (totalling 2.1ha) adjoining existing industrial estates which are not yet developed. Part of the Clevedon 5/20 already has planning permission for employment development.

Land west of Kenn Road Clevedon (8.2ha) is similarly in band C and though green field, has extant planning permission for development of a business park; (13/P/1729/O)).

The Elliott Medway site (0.3ha) at Congresbury is in the Bat Consultation Zone in band A, but is previously developed land and already has planning permission for housing and B1 employment, and the housing has already been built

The 0.42 ha Park Farm site at Yatton is in the Bat Consultation Zone in band C, bordering B, but is previously developed land already developed with a large and smaller building, and hardstandings.

The North West Nailsea (1.5 ha) allocation is similarly on the border of bands B and C, and is green field, though could include an area occupied by farm buildings; (the employment site would be part of the wider mixed use site).

The Burnett industrial estate and Havyatt Business Park, Wrington allocation (0.51ha) is within the Bat Consultation Zone in band B, bordering C. However, though green field it adjoins an existing industrial estate, and already has planning permission for a single storey warehouse.

Analysis:

Regarding the largest employment allocations (major development at Weston Villages) the SPD has already covered bat mitigation requirements. It, like most of the employment allocations, affects band C land only. Most of the allocations affect land at or adjoining existing industrial estates and a number already have planning permission for employment development.

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| | <i>It is considered that <u>application of the Bats guidance together with application of relevant policies on nature conservation, such as policy DM8 of the Development Management Policies Plan should ensure there is appropriate mitigation for any adverse effects on horseshoe bats. Therefore the employment allocations in policy SA4 should not have LSEs on the SAC.</u></i> |
| <i>Might there be effects but not significant?</i> | No |
| <i>Other comments</i> | None |

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| <i>Plan policy or proposal</i> | <i>Policy SA5 Safeguarding of existing employment sites</i> <i>Safeguards existing employment sites in Schedule 3 for business development (primarily B1, B2 and B8 uses). Only permits proposals for non B use classes on the sites where criteria are met, including ancillary to main B use, etc. The schedule states that development on the sites will need to conform to the Core Strategy, Sites and Policies Plan Part 1 (Development Management Policies), relevant Supplementary Planning Documents and Neighbourhood Development Plans.</i> |
| <i>Without mitigation, might there be likely significant effects, what sort? If so, can the likely significant effects be mitigated, so there would not be LSEs?</i> | <i>No LSEs. The policy merely safeguards existing employment sites for that purpose, and new development is not being proposed. Therefore it is not considered likely that the policy would have significant effects (LSEs) on the SAC.</i> |
| <i>Might there be effects but not significant?</i> | No |
| <i>Other comments</i> | None |

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| <i>Plan policy or proposal</i> | <i>Policy SA6 Restriction on change of use of land in existing economic use</i> <i>Only permits change of use of land in existing economic use where it can be demonstrated that criteria would be met, including that loss of the site would not harm the range or quality of sites available for business use, etc.</i> |
| <i>Without mitigation, might there be likely significant effects, what sort? If</i> | <i>No LSEs. New development is not being proposed. It is not considered likely that the policy would have significant effects (LSEs) on the SAC.</i> |

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| so, can the likely significant effects be mitigated, so there would not be LSEs? | |
| Might there be effects but not significant? | No |
| Other comments | None |

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| Plan policy or proposal | Policy SA7 Local Green Space <i>Prevents development which adversely affects designated Local Green Space, particularly regarding characteristics underpinning designation, such as beauty, historic importance, recreational value, tranquillity or richness of wildlife, except in very special circumstances.</i> |
| Without mitigation, might there be likely significant effects, what sort? If so, can the likely significant effects be mitigated, so there would not be LSEs? | <i>No LSEs. Protective nature of policy, and particularly reference to wildlife, suggests likely benefit to biodiversity where proposed Local Green Space is on a site of wildlife interest. In any case, the only European site affected by Local Green Space proposals is Uphill Cliff, relating to the Mendip Limestone Grasslands SAC, not the Bats SAC.</i> |
| Might there be effects but not significant? | No |
| Other comments | None |

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| Plan policy or proposal | Policy SA8 Undesignated Green Space <i>States that within settlements planning permission will not be granted for development that unacceptably affects the value of undesignated green space making a worthwhile contribution to the townscape, character, setting and visual attractiveness of the settlement.</i> |
| Without mitigation, might there be likely significant effects, what sort? If so, can the likely significant effects be mitigated, so there would not be LSEs? | <i>No LSEs. Protective policy which in any case relates only to undesignated areas of green space within defined settlements, and no European sites, or their component SSSIs, are within such settlements.</i> |
| Might there be effects but not significant? | No |
| Other comments | None |

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| Plan policy or proposal | Policy SA9 Strategic gaps |
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| | <i>Protective policy which only permits development within strategic gaps where the open or undeveloped character of the gap would not be significantly adversely affected, the separate identity and character of the settlements would not be harmed, and the landscape setting of the settlements would not be harmed.</i> |
| <i>Without mitigation, might there be likely significant effects, what sort? If so, can the likely significant effects be mitigated, so there would not be LSEs?</i> | <i>No. Protective policy not likely to have significant effects on a European site. In any case none of the proposed strategic gaps in the Plan affect European sites.</i> |
| <i>Might there be effects but not significant?</i> | <i>No</i> |
| <i>Other comments</i> | <i>None</i> |

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| <i>Plan policy or proposal</i> | <p><i>Policy SA10 Sites for community uses</i> <i>Allocates or safeguards land for community uses (facilities), as listed in schedule 5, like strategic open space (typically playing fields/play areas), allotments, cemeteries and primary schools.</i></p> <p><i>Some of the proposed sites are located in bands A or B of the Bats consultation zone. For example, land at Stream Cross, Claverham, proposed for strategic open space is in band A. Land to the south of Church Lane, Backwell proposed for primary school playing fields, is on the border between bands A and B. Land south of Rickyard Road, Wrington, proposed for strategic open space is within band B. All these proposals could have implications for artificial lighting that could potentially affect bats.</i></p> <p><i>However <u>application of the Bats guidance</u>, (which makes particular references to lighting, as shown in the extracts above) <u>together with application of relevant policies on nature conservation, such as policy DM8 of the Development Management Policies Plan</u> should ensure there is appropriate mitigation for any adverse effects on horseshoe bats. Therefore the community use allocations in policy SA4 should not have LSEs on the SAC.</i></p> |
| <i>Without mitigation, might there be likely significant effects, what sort? If so, can the likely significant effects be mitigated, so there would not be LSEs?</i> | <i>No.</i> |
| <i>Might there be effects but not significant?</i> | <i>No</i> |
| <i>Other comments</i> | <i>None</i> |

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| <p>Plan policy or proposal</p> | <p>Policy SA11 Weston super Mare town centre regeneration area <i>Defines the extent of the town centre regeneration area on the proposals Map. States that within it a range and mix of town centre and residential uses are appropriate. A Supplementary Planning Document (SPD) will provide detailed guidance to support implementation.</i> <i>Priorities will include:</i> <i>-provision of approximately 900 new homes</i> <i>-a priority zone for new development between the railway station/Hildesheim Bridge and the town centre through development of underused brownfield sites. Development briefs will be set out for Walliscote Place, Station Approach and Dolphin Square</i> <i>-improvements to Town Square as the main town centre public space</i> <i>-improvements to the public realm, pedestrian, bus and cycle links.</i> <i>Development will be required to respond to and build upon the charm and distinctiveness of Weston's natural setting and seafront location, and complement and enhance the qualities of the urban form, green spaces and heritage qualities.</i></p> |
| <p>Without mitigation, might there be likely significant effects, what sort? If so, can the likely significant effects be mitigated, so there would not be LSEs?</p> | <p><i>The proposed Weston Regeneration Area comprises mainly previously developed land, focussed on the town centre, all within the urban area and settlement boundary of the town. It adjoins the sea front to the west, from Anchor Head in the north (south of Birnbeck Pier) to opposite Ellenborough Park in the south.</i> <i>While the regeneration area is mostly within the Bat Consultation Zone, it is band C only. Also the brownfield nature and urban location of the proposed development sites should reduce the likelihood of significant effects on horseshoe bats. However <u>application of the Bats guidance together with application of relevant policies on nature conservation, such as policy DM8 of the Development Management Policies Plan</u> should ensure there is appropriate mitigation for any adverse effects on horseshoe bats. Therefore the site allocations in policy SA11, which include mixed use sites like Dolphin Square and the station approach (both urban, brownfield, for 220 and 300 dwellings respectively) should not have LSEs on the SAC.</i></p> |
| <p>Might there be effects but not significant?</p> | <p>No</p> |
| <p>Other comments</p> | <p>None</p> |

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| Plan policy or proposal | <p>Policy SA12 A370 corridor into Weston super Mare <i>Requires that development proposals affecting and visible from a defined A370 corridor from the M5 to the town centre must contribute to the creation of a continuous coordinated high quality visual approach into Weston super Mare.</i> <i>Priority will be given to a landscaped boulevard approach with street trees supported by high quality design, siting, design and materials to create a corridor of high quality townscape and architectural interest.</i></p> |
| <p>Without mitigation, might there be likely significant effects, what sort? If so, can the likely significant effects be mitigated, so there would not be LSEs?</p> | <p><i>This policy is seeking the enhancement of an existing corridor rather than new development. It does not allocate land for development but merely applies controls to development proposals which would come forward, either on land allocated by other policies or on windfall sites. In any case it applies to a relatively restricted area (visible from the A370). While much of that falls within the Bat Consultation Zone, it is band C only, and within the Weston urban area, where the likelihood of development having significant effects on the SAC is not great. The policy also advocates a landscaped boulevard approach with street trees which might actually be beneficial to bats. Also development proposals would be subject to application of the Bats guidance together with application of relevant policies on nature conservation, such as policy DM8 of the Development Management Policies Plan.</i> <i>So policy SA12 would not in itself give rise to development proposals, and could potentially help to make any development proposals which do arise better for bats. No LSEs.</i></p> |
| <p>Might there be effects but not significant?</p> | <p>No</p> |
| <p>Other comments</p> | <p>None</p> |

5.6 Conclusion:

5.7 With appropriate mitigation (the underlined measures above), screening predicts no LSEs on the North Somerset and Mendip Bats SAC from the policies in the Site Allocations Plan.

6.0 **SCREENING FOR THE AVON GORGE WOODLANDS SAC**

6.1 **Summary site description and issues in the Site Improvement Plan (SIP):**

- 6.2 The Avon Gorge Woodlands SAC is good example of *Tilio-Acerion* forests in south-west England. It is important because of the high concentration of Small-leaved lime *Tilia cordata* and the presence of rare whitebeams *Sorbus spp.*, including at least two which are unique to the Avon Gorge (*S.bristoliensis* and *S. wilmottiana*), and other nationally scarce plants, such as Angular Solomon's-seal *Polygonatum odoratum*.
- 6.3 The associated species-rich transitions to scrub and herb-rich calcareous open limestone grassland often found on cliff ledges support a high number of Nationally Rare and Scarce species, such as Bristol rock-cress *Arabis scabra*, round-headed leek ('Bristol onion') *Allium sphaerocephalon* and honewort *Trinia glauca*.
- 6.4 Part of the Leigh Woods side of the SAC is considered to be an important remnant wood pasture habitat which was managed as a wood pasture for many hundreds of years. This is shown by the presence of large numbers of veteran pollards, which are also highly likely to be important for saproxylic invertebrates.
- 6.5 The SIP identifies the following priorities and issues: invasive species, undergrazing, public access/disturbance, disease, changes in species distributions, and air pollution: impact of atmospheric nitrogen deposition.
- 6.6 Few of the priorities and issues relate to the Site Allocations Plan, with the possible exceptions of public access/disturbance, and air pollution. The SIP provides the following information on them:
- 6.7 **Public access/disturbance**
Most legal access isn't a problem and the main issues result from inappropriate and often illegal access, an example of which is the use of the steep side of the Gorge on the North Somerset side for downhill mountain biking. Other negative aspects of access ranges from overall visitor pressure to vandalism. Future close monitoring and security work is needed involving various parties, to ensure the site remains protected.
- 6.8 'Legal' or permitted access still needs close monitoring and engagement to ensure that no damage to sensitive SAC habitats occurs. There is increasing pressure to encourage more people onto the site to appreciate it. This could quite conceivably increase over the coming years due to increased interest and a desire to engage further.

- 6.9 There are many opportunities to improve safe multi-user access to certain areas of both sides of the Gorge, and also further possibilities to link both sides together by promoted routes. The understanding of the National and European significance of the site through engagement, promotion and interpretation is key to its sustainable use. Clearly the SAC features should be at the forefront of all future public engagement and access decisions. Nitrogen deposition from dog fouling could lead to further specific local impacts.
- 6.10 The SIP advocates the following “Action”: Development of an Avon Gorge-wide ‘Public access engagement, interpretation, improvement and management plan’. Development of this plan could be coordinated by a new Project Officer role.
- 6.11 Air pollution: impact of atmospheric nitrogen deposition
Nitrogen deposition exceeds site-relevant critical loads. The site is situated on the edge of a city and there are major roads and other transport routes currently running directly through and adjacent to it. The effect of these, general urban pollution and the amount of atmospheric nitrogen deposition has not been fully studied but it is likely to be a potential issue for the SAC features currently and in the long term. Pollution influences from Avonmouth and Severnside should also be considered due to the relatively close proximity to the site.
- 6.12 The SIP advocates the following “Action”: Control, reduce and ameliorate atmospheric nitrogen impacts. Develop a long term monitoring strategy for the effects of nitrogen deposition on rare plants and SAC habitats directly linking to changes in species distribution.
- 6.13 Screening matrices

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| <p>Plan policy or proposal Policy SA1 Housing allocations</p> | <p>Policy SA1 Housing allocations Indicates that residential sites of 10 or more units are shown on the Policies Map and Schedule 1, with any specific site-related requirements or key considerations to take into account. Also the schedule states that development on the sites will need to conform to the Core Strategy, Sites and Policies Plan Part 1 (Development Management Policies), relevant Supplementary Planning Documents and Neighbourhood Development Plans.</p> |
| <p>Without mitigation, might there be likely significant effects (LSEs), what sort? If so, can the likely significant effects be mitigated, so there would not be LSEs?</p> | <p>Most of the housing allocations are at Weston super Mare and therefore at least 20km from the SAC, and unlikely to impact on it significantly. The Core Strategy HRA found that, in view of that distance, the policy (CS28) for development at Weston super Mare would be unlikely to have significant traffic-related air pollution impacts</p> |

The nearest housing allocation to the Avon Gorge Woodlands SAC is 1.8km away (the Redwood Lodge and Country Club, Failand, allocated for 124 dwellings.) It is unlikely to have a significant effect on the SAC, being already developed, and separated from the SAC by the extensive Ashton Court Estate, a Registered historic park or garden and a SSSI.

The next nearest is Barrow Hospital 4.3km away, proposed for 43 dwellings, and a previously developed site, separated from the SAC not only by the Ashton Court Estate but also the entire Long Ashton village and nearby bypass and railway. It is unlikely to have a significant effect on the SAC.

The next nearest housing allocations are the Severn Paper Mill (South West) site, (about 7km away, again a brown field site within the built up area of Portishead); and then the Station Road, site, Nailsea, (nearly 9km away, comprising a dwelling and land to the rear within the built up area of Nailsea). It is unlikely that development of these sites, relatively distant from the SAC, would have significant effects on it.

The Core Strategy HRA identified the potential for possible traffic-related pollution effects on the SAC from traffic growth on roads near to it, such as the A4, A369, A4176 and B3129. However it is unlikely, given their location and limited scale, that there would be significant cumulative (in-combination) effects from the above housing allocations regarding traffic-related pollution. They are not particularly close to those roads. The nearest, (the Redwood Lodge and Country Club, Failand), is over 1.8km away from the nearest of them, the A369.

The Core Strategy HRA considered the potential for in-combination traffic and point source pollution impacts on the SAC, and concluded that, even for all the Core Strategy policies considered, with avoidance/mitigation measures there would not be LSEs. The measures included sustainable transport policies in the Bristol Core Strategy (policy BCS10) and West of England Joint Local Transport Plan, and implementation of measures to promote non-car travel modes as promoted in Core Strategy policies such as CS10. (See link in paragraph 2.4 above).

The Core Strategy HRA found that recreational impacts on the SAC were considered in the HRA of the Bristol Core Strategy, which concluded that the site is not particularly vulnerable to trampling, and largely inaccessible due to steepness. While part of the site is more accessible (Leigh Woods National Nature Reserve) there are lots of footpaths, offering the opportunity for walking without harming habitats.

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| | Thus it is considered that none of the housing allocations in policy SA1 would individually have LSEs on the SAC, and even cumulatively, significant effects are unlikely, particularly with the underlined mitigation measures above. |
| Without mitigation, might there be some minor effects, but not significant? | No |
| Other comments | None |

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| Plan policy or proposal | Policy SA2 Settlement boundaries for towns, service and infill villages. Define area where development will be acceptable in principle, subject to detailed policies in plans. Extension of residential curtilage, including into countryside, permitted subject to no harm to character of surrounding area or amenities of adjoining occupiers. |
| Without mitigation, might there be likely significant effects, what sort? If so, can the likely significant effects be mitigated, so there would not be LSEs? | No extension of settlement boundaries is proposed in the vicinity of the Avon Gorge Woodlands SAC. The nearest settlements to the SAC are both nearly 2km away (Easton in Gordano/Pill and Long Ashton). No LSEs. |
| Might there be effects but not significant? | No |
| Other comments | None |

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| Plan policy or proposal | Policy SA3 Mixed use sites These overlap with the residential sites of 10 or more units covered by policy SA1, and are on the same Schedule 1. Any specific site-related requirements or key considerations, and any other relevant policy considerations to be taken into account. |
| Without mitigation, might there be likely significant effects, what sort? If so, can the likely significant effects be mitigated, so there would not be LSEs? | None of the sites in schedule 1 which are closest to the Avon Gorge Woodlands SAC, considered under policy SA1 above, are mixed use sites. Most of the mixed use sites are at Weston super Mare, at least 20km from the SAC. Therefore it is unlikely that policy SA3 would have significant effects on the SAC. |
| Might there be effects but not significant? | No |

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| Other comments | None |
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| <p>Plan policy or proposal</p> | <p>Policy SA4 Business Development Allocates sites in Schedule 2 for new business development (B1,B2 and B8 uses). Only permits proposals for non B use classes on the sites where criteria are met, including where ancillary to main use, small scale, etc. Also the schedule states that development on the sites will need to conform to the Core Strategy, Sites and Policies Plan Part 1 (Development Management Policies), relevant Supplementary Planning Documents and Neighbourhood Development Plans.</p> |
| <p>Without mitigation, might there be likely significant effects, what sort? If so, can the likely significant effects be mitigated, so there would not be LSEs?</p> | <p>None of the allocated sites for business development are in close proximity to the Avon Gorge Woodlands SAC, the nearest being the Estune Business Park (former Long Aston Research station) at Long Ashton, about 3.7km away. The site is a small (0.38) ha part of a larger (1.16ha) site with outline planning permission for commercial development, partly developed as a Business Park. The permission is still valid as only part of the development has been built. The site is a residual part of a long standing employment allocation which has been carried over from the adopted North Somerset Replacement Local Plan. It is surrounded by existing commercial and housing development.</p> <p>The site is at the far south west end of the village of Long Ashton, furthest from the SAC, and the village is separated from the SAC by the Ashton Court Estate. Given its location it is unlikely that the allocation will have significant effects on the SAC.</p> <p>The next nearest proposed employment sites to the SAC are at Portishead (a 1.6ha site at Gordano Gate and a 1.2ha site at Marine View/Portishead Quays). They are both existing employment sites and residual allocations from the North Somerset Local Plan, located in the middle of the Portishead urban area. They are over 7 km from the Avon Gorge Woodlands SAC.</p> <p>Given their location, it is not considered likely that these allocated sites would have significant effects (LSEs) on the SAC.</p> <p>Also, as indicated under policy SA1 above, the Core Strategy HRA considered the potential for traffic-related in-combination effects on the SAC and concluded that, with the avoidance/mitigation measures referred to, there would not be LSEs. The measures include <u>sustainable transport policies in the Bristol</u></p> |

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| | <p><u>Core Strategy (policy CS10) and West of England Joint Local Transport Plan, and implementation of measures to promote non-car travel modes as promoted in Core Strategy policies such as CS10.</u> (See link in paragraph 2.4 above).</p> <p>Thus it is considered that none of the employment allocations in policy SA4 would individually have LSEs on the SAC, and even cumulatively, significant effects are unlikely, particularly with the underlined mitigation measures above.</p> |
| Might there be effects but not significant? | No |
| Other comments | None |

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| Plan policy or proposal | <p>Policy SA5 Safeguarding of existing employment sites Safeguards existing employment sites in Schedule 3 for business development (primarily B1, B2 and B8 uses). Only permits proposals for non B use classes on the sites where criteria are met, including ancillary to main B use, etc. The schedule states that development on the sites will need to conform to the Core Strategy, Sites and Policies Plan Part 1 (Development Management Policies), relevant Supplementary Planning Documents and Neighbourhood Development Plans.</p> |
| Without mitigation, might there be likely significant effects, what sort? If so, can the likely significant effects be mitigated, so there would not be LSEs? | <p>The nearest sites safeguarded for business development are at/near Easton in Gordano/Pill. They are the 3.5ha Eden Office Park, Ham Green, nearly 1.4km away, and the 0.3ha Old Brewery Office Park, Lodway, Pill, about 2.4km away. The former site is separated from the SAC by buildings and/or a tree-lined freight railway line, plus a significant area of countryside. The latter is amidst development in the middle of the settlement of Easton in Gordano/Pill.</p> <p>The next nearest sites for business development are the Long Ashton Business Park about 2.8km away, and the Estune Business Park (former Long Ashton Research Station). They are both 0.7ha. They are south of and on the south west side of Long Ashton respectively, and separated from the SAC by that village and the Ashton Court Estate Registered Historic Park or Garden, which is also further protected as a designated Local Green Space in the Long Ashton Neighbourhood Plan.</p> <p>All of these sites are existing employment sites which are merely being safeguarded for that purpose, and new development is not being proposed.</p> |

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| | Taking account of these points it is not considered likely that the policy would have significant effects on the SAC. |
| Might there be effects but not significant? | No |
| Other comments | None |

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| Plan policy or proposal | Policy SA6 Restriction on change of use of land in existing economic use Only permits change of use of land in existing economic use where it can be demonstrated that criteria would be met, including that loss of the site would not harm the range or quality of sites available for business use, etc. |
| Without mitigation, might there be likely significant effects, what sort? If so, can the likely significant effects be mitigated, so there would not be LSEs? | New development is not being proposed. It is not considered likely that the policy would have significant effects (LSEs) on the Avon Gorge Woodlands SAC. |
| Might there be effects but not significant? | No |
| Other comments | None |

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| Plan policy or proposal | Policy SA7 Local Green Space Prevents development which adversely affects designated Local Green Space, particularly regarding characteristics underpinning designation, such as beauty, historic importance, recreational value, tranquillity or richness of wildlife, except in very special circumstances. |
| Without mitigation, might there be likely significant effects, what sort? If so, can the likely significant effects be mitigated, so there would not be LSEs? | Protective nature of policy, and particularly reference to wildlife, suggests likely benefit to biodiversity where proposed Local Green Space is on a site of wildlife interest. In any case there is no proposed area of Local Green Space (LGS) on the Avon Gorge Woodlands SAC. The nearest proposed LGS to the SAC is a large area on the other side of the A396, and includes the Ashton Court Estate. It is already a designated Local Green Space in the Long Ashton |

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| | Neighbourhood Plan. That designation should help to prevent development occurring near to the SAC. No LSEs |
| Might there be effects but not significant? | No |
| Other comments | None |

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| Plan policy or proposal | Policy SA8 Undesignated Green Space States that within settlements planning permission will not be granted for development that unacceptably affects the value of undesignated green space making a worthwhile contribution to the townscape, character, setting and visual attractiveness of the settlement. |
| Without mitigation, might there be likely significant effects, what sort? If so, can the likely significant effects be mitigated, so there would not be LSEs? | Protective policy which in any case relates only to undesignated areas of green space within defined settlements. No European sites, or their component SSSIs, are within defined settlements. Being undesignated, the areas of green space which would be subject to the policy cannot be identified in advance. Whether a green space would be subject to the policy would only be determined at such time as planning applications are submitted and considered, and depend on whether the planning officer considers the site to make the “worthwhile contribution”. No LSEs. |
| Might there be effects but not significant? | No |
| Other comments | None |

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| Plan policy or proposal | Policy SA9 Strategic gaps Protective policy which only permits development within strategic gaps where the open or undeveloped character of the gap would not be significantly adversely affected, the separate identity and character of the settlements would not be harmed, and the landscape setting of the settlements would not be harmed. |
| Without mitigation, might there be likely significant effects, what sort? If so, can the likely significant effects be mitigated, so there would not be LSEs? | Protective policy not likely to have significant effects on a European site. In any case none of the proposed strategic gaps in the Plan affect European sites. No LSES. |
| Might there be effects but not significant? | No |
| Other comments | None |

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| Plan policy or proposal | Policy SA10 Sites for community uses Allocates or safeguards land for community uses (facilities), as listed in schedule 5. |
| Without mitigation, might there be likely significant effects, what sort? If so, can the likely significant effects be mitigated, so there would not be LSEs? | None of the proposed community facilities are close to the Avon Gorge Woodlands SAC, the nearest being an area of proposed strategic open space adjacent to the Flax Bourton C of E Primary School, over 5.4km away. This proposed facility is unlikely to have significant effects on the SAC. No LSEs. |
| Might there be effects but not significant? | No |
| Other comments | None |

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| Plan policy or proposal | Policy SA11 Weston super Mare town centre regeneration area Defines the extent of the town centre regeneration area on the proposals Map. States that within it a range and mix of town centre and residential uses are appropriate. A Supplementary Planning Document (SPD) will provide detailed guidance to support implementation. Priorities will include: -provision of approx. 900 new homes -a priority zone for new development between the railway station/Hildesheim Bridge and the town centre through development of underused brownfield sites. Development briefs will be set out for Walliscote Place, Station Approach and Dolphin Square -improvements to Town Square as the main town centre public space -improvements to the public realm, pedestrian, bus and cycle links. Development will be required to respond to and build upon the charm and distinctiveness of Weston's natural setting and seafront location, and complement and enhance the qualities of the urban form, green spaces and heritage qualities. |
| Without mitigation, might there be likely significant effects, what sort? | The proposed Weston town centre regeneration area comprises mainly previously developed land all within the urban area and settlement boundary of the town. It adjoins the sea front to the west, from Anchor Head in the north (south of Birnbeck Pier) to opposite Ellenborough Park in the south. All of the |

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| If so, can the likely significant effects be mitigated, so there would not be LSEs? | key development areas identified in the draft SPD, including the major mixed use development sites, are previously developed land. Being in Weston super Mare, the regeneration area is a long way (25km) from the Avon Gorge Woodlands SAC, and the proposed development there is unlikely to have significant effects on it. |
| Might there be effects but not significant? | No |
| Other comments | None |

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| Plan policy or proposal | Policy SA12 A370 corridor into Weston super Mare Requires that development proposals affecting and visible from a defined A370 corridor from the M5 to the town centre must contribute to the creation of a continuous coordinated high quality visual approach into Weston super Mare. Priority will be given to a landscaped boulevard approach with street trees supported by high quality design, siting, design and materials to create a corridor of high quality townscape and architectural interest. |
| Without mitigation, might there be likely significant effects, what sort? If so, can the likely significant effects be mitigated, so there would not be LSEs? | This corridor is confined to a relatively restricted area within the Weston urban area and is over 20km from the Avon Gorge Woodlands SAC. In any case the policy is seeking the enhancement of an existing corridor rather than new development. No LSEs. |
| Might there be effects but not significant? | No |
| Other comments | None |

6.14 Conclusion

6.15 Screening predicts, with appropriate mitigation as indicated (underlined) above, no LSEs on the Avon Gorge Woodlands SAC from the policies in the Site Allocations Plan.

7.0 Analysis of the screening matrices

7.1 The screening matrices found that many policies would not have likely significant effects on any of the European sites even without the need for mitigation. The following policies fell into that category:

SA2 settlement limits

SA5 Safeguarded employment sites

SA6 No change of use of land in existing economic use

SA7 Local Green Space

SA8 Undesignated green space

SA9 Strategic gaps

SA12 A370 corridor into Weston super Mare

7.2 For the other policies it was found that, without mitigation, there was potential for likely significant effects (LSEs) on European sites. However, with mitigation, (as indicated by the underlined measures in the screening matrices) there would not be LSEs.

8.0 Consideration of in combination effects

8.1 Guidance on HRA requires that HRA should consider the likelihood of in-combination effects, (taking account of other plans and projects in combination with the plan). However, it is considered that the scope for in-combination effects from developments in lower tier plans like the Site Allocations Plan (SAP) has already been covered by the HRA of the Core Strategy, since the Core Strategy is the higher level plan which covers development requirements as a whole. The SAP is merely allocating sites to meet those requirements.

8.2 This is borne out by the matrices above which cross-refer where relevant to the Core Strategy HRA, particularly where it refers to possible in-combination effects relating to air quality. The Core Strategy HRA concluded that, with appropriate avoidance/mitigation measures including sustainable transport measures in the Bristol Core Strategy (policy BS10) and West of England Joint Local Transport Plan, and implementation of measures to promote non-car travel modes as in policy CS10 of the North Somerset Core Strategy, there would not be in-combination LSEs on European sites from the Core Strategy. Thus it is reasonable to conclude that that would also apply to the Site Allocations Plan.

8.3 However, as a further check the above screening matrices indicate cases where it was felt that there might be scope for cumulative/in-combination effects from policies in the Site Allocations Plan, (particularly concerning development of a number of allocated sites together, for example), although the likelihood is often very slight. The identified cases are as follows:

8.4 Severn Estuary site

| Policy | Issue | Mitigation | LSEs predicted with mitigation? |
|---|--|---|--|
| Policy SA1 Housing allocations | The presence of walkers, dogs and vehicles on the southern end of the beach at Weston Bay appears to disturb waders using identified Roost E1. Potential for cumulative impact of housing developments at Weston super Mare. | Consideration of visitor management, which might include provision of notice boards at the south end of the beach at Weston Bay, indicating the proximity of an important high tide roost for water birds and the need to keep dogs on leads between October and April. | No |
| Policy SA3 Mixed use allocations | As above. | As above. | No |
| Policy SA11 Weston super Mare town centre regeneration area | As above. Includes housing and mixed use allocations. | As above. | No |

8.5 Mendip Limestone Grasslands

| Policy | Issue | Mitigation | LSEs predicted with mitigation? |
|--------------------------------|---|---|--|
| Policy SA1 Housing allocations | Potential for increased recreational impacts such as trampling of rare plants or erosion of the grassland; (possibly from cumulative impact of housing developments at Weston | Promotion of interpretation boards encouraging restriction of walking to established public footpaths at the Uphill Cliff component SSSI. | No |

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| | super Mare on Uphill component site). | | |
| Policy SA3 Mixed use allocations | As above. | As above. | No |
| Policy SA11 Weston super Mare town centre regeneration area | As above. Includes housing and mixed use allocations. | As above. | No. |

8.6 North Somerset and Mendip Bats SAC

| Policy | Issue | Mitigation | LSEs predicted with mitigation? |
|--|--|--|--|
| <i>Policy SA2 Housing allocations</i> | <i>Potential for adverse impact on horseshoe bats from development, such as loss of or fragmentation of habitat or features, impact of artificial lighting. Potential for cumulative impact of developments occurring together, particularly in bands A or B of the Bat Consultation Zone.</i> | <i>Application of guidance on development for the SAC. Where appropriate retention/provision of dark corridors for bats, such as at the Weston Villages.</i> | <i>No.</i> |
| <i>Policy SA3 Mixed use allocations</i> | <i>As above.</i> | <i>As above.</i> | <i>No.</i> |
| <i>Policy SA4 Employment allocations</i> | <i>As above.</i> | <i>As above.</i> | <i>No.</i> |
| <i>Policy SA10 Community use allocations</i> | <i>As above.</i> | <i>As above.</i> | <i>No.</i> |
| <i>Policy SA11 Weston super Mare town centre regeneration area</i> | <i>As above.</i> | <i>Application of guidance on development for the SAC.</i> | <i>No.</i> |

8.7 Avon Gorge Woodlands SAC

| Policy | Issue | Mitigation | LSEs predicted with mitigation? |
|---------------------------------|--|--|---------------------------------|
| Policy SA1 Housing allocations | <p>The Core Strategy HRA identified the potential for possible traffic-related pollution effects on the SAC from traffic growth on roads near to it, such as the A4, A369, A4176 and B3129. There is a very slight possibility of cumulative (in-combination) effects of traffic-related pollution from housing allocations in the SAP, but the likelihood is very small because the Plan's housing allocations are mostly distant from those roads. Most are at Weston super Mare or the other towns.</p> | <p>The Core Strategy HRA considered the potential for in-combination traffic and point source pollution impacts on the SAC, and concluded that, even for all the Core Strategy policies considered, with avoidance/mitigation measures there would not be LSEs. The measures included sustainable transport policies in the Bristol Core Strategy (Policy BCS10) and West of England Joint Local Transport Plan, and implementation of measures to promote non-car travel modes as promoted in Core Strategy policies such as CS10. Such measures would also ensure there would be no in-combination effects from the Site Allocations Plan.</p> | No |
| Policy SA4 Business Development | <p>The likelihood of traffic-related in-combination effects from the employment allocations is low. Most of the employment allocations are at Weston super Mare and the other towns, distant from the SAC and roads near it referred to above. The only employment allocation within 4km of the SAC is the Estune</p> | As above. | No |

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| | Business Park at Long Ashton, about 3.7km away, and the next nearest are at Portishead, over 7km away. | | |
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8.8 Consideration of other plans and projects

8.9 Guidance on HRA requires consideration of plans in combination with other relevant plans and projects, such as other development plans being brought forward by other public bodies and agencies, or significant projects given planning permission which are not yet started or completed.

8.10 As at 1 October 2016 the council had no record of any approved planning applications for 100 dwellings or more which were on windfall (unallocated) sites, and the allocated sites have already been taken into account in this HRA.

8.11 Regarding other plans and projects, the updated HRA of the Core Strategy (April 2016) considered a number, and found that with the mitigation requirements in that HRA, and those in the plans and projects considered, there would not LSEs on European sites; (See [HRA of Core Strategy](#)).

8.12 The other plans and projects were:

Hinkley Point C Connection Project

Bristol Core Strategy

Sedgemoor Core Strategy

Mendip Core Strategy

9.0 Overall conclusion to this HRA

9.1 The HRA has involved screening of the policies and proposals in the Site Allocations Plan, and consideration of possible cumulative/in-combination effects, drawing on the HRA of the Core Strategy where appropriate.

9.2 The HRA has found that, with appropriate mitigation as identified (underlined) in the matrices above, there would not be likely significant effects on the four European Sites considered, from the Site Allocations Plan. Therefore there is no need for further stages of HRA to occur, such as Appropriate Assessment.

Appendices

Appendix A

Note regarding process of sign-off of the HRA by Natural England

HRA (screening) of the October 2016 Site Allocations Plan Publication version in respect of three of the four European Sites in North Somerset (the Severn Estuary, Mendip Limestone Grasslands and Avon Gorge Woodlands sites) was documented in an initial HRA report (the black, ordinary text in the above report) and sent to Natural England in November 2016. We were pleased that that work was subsequently signed off by Natural England in an e mail dated 12 January 2017 which included: “ *further to our conversation back in December, for the record, I can confirm that we concur with the conclusions as set out in section 9, namely that The HRA has found that, with appropriate mitigation as identified (underlined) in the matrices above, there would not be likely significant effects on the three European Sites considered so far, from the Site Allocations Plan. Therefore, in respect of those European sites, there is no need for further stages of HRA to occur*”.

We had informed Natural England in November 2016 that we would not be sending the full HRA to them for sign-off at that time because we had not yet carried out screening for the fourth site (the North Somerset and Mendip Bats SAC). Work on the emerging guidance for the Bats SAC (North Somerset and Mendip Bats Special Area of Conservation (SAC): Guidance on development) had not yet been completed, and we felt that screening should have regard to that guidance.

Following this, work on the bats guidance progressed, and reached a stage of being very close to being finalised, such that we felt that any further changes would be unlikely to affect the thrust of the guidance or implications for HRA. Therefore screening of the Site Allocations Plan Publication concerning the Bats SAC was carried out early in 2017, taking account of the guidance. The work relating to this was added to the HRA report as purple italics text, and the resulting full HRA document (above) was sent to Natural England on 31 January 2017, (together with the latest version of the bats guidance for them to refer to if necessary).

Natural England responded in an e mail of 8 February 2017, including:

“I can confirm that Natural England agrees with the conclusion in para 5.7, namely that:

“With appropriate mitigation (the underlined measures above), screening predicts no LSEs on the North Somerset and Mendip Bats SAC from the policies in the Site Allocations Plan. ”

However, please note that at the present time, a mechanism for delivering appropriate mitigation (namely the North Somerset and Mendip Bats Special Area of Conservation (SAC): Guidance on Development) is not in place, and so currently LSE cannot be ruled out.

Natural England very much welcomes the work done on the Guidance. While there is some detail yet to be finalised, the general approach to mitigation in it has been agreed by Natural England.

The intent of the guidance is that developments following the guidance will, by that fact, not have a likely significant effect, either alone or in combination in terms of the issues covered by the guidance. Therefore when you have confirmation from Natural England that the approach is adequate for this purpose, it follows that, provided it is implemented for the sites in the site allocation plan, the site allocation plan will not have a likely significant effect on the SACs concerned in terms of the issues covered by the guidance.

Whilst this guidance currently provides strong evidence that the Site Allocations Plan for North Somerset will not have a likely significant effect, until the guidance is confirmed by Natural England as adequate, we cannot confirm that the Plan will not have a likely significant effect.”

The council is pleased that Natural England agree that with the appropriate mitigation measures indicated in the HRA, including application of the bats guidance where appropriate, the Plan would not have likely significant effects on the Bats SAC. The council is pleased that Natural England considers that the “guidance currently provides strong evidence” that the Plan will not have a likely significant effect. The guidance that was sent to Natural England was very close to being finalised, and we hope that by the time the Examination into the Plan is held, the guidance will have been finalised and confirmed by Natural England to be adequate.

Appendix B

Details on the European Sites

Severn Estuary site (SAC, SPA, Ramsar)

Conservation objectives for SAC , SPA

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

Qualifying features for SAC:

H1110. Sandbanks which are slightly covered by sea water all the time; Subtidal sandbanks
H1130. Estuaries
H1140. Mudflats and sandflats not covered by seawater at low tide; Intertidal mudflats and sandflats
H1170. Reefs
H1330. Atlantic salt meadows (*Glauco-Puccinellietalia maritimae*); Atlantic salt meadows
S1095. *Petromyzon marinus*; Sea lamprey
S1099. *Lampetra fluviatilis*; River lamprey
S1103. *Alosa fallax*; Twaite shad

Qualifying Features for SPA:

A037 *Cygnus columbianus bewickii*; Bewick's swan (Non-breeding)
A048 *Tadorna tadorna*; Common shelduck (Non-breeding)
A051 *Anas strepera*; Gadwall (Non-breeding)
A149 *Calidris alpina alpina*; Dunlin (Non-breeding)
A162 *Tringa totanus*; Common redshank (Non-breeding)
A394 *Anser albifrons albifrons*; Greater white-fronted goose (Non-breeding)
Waterbird assemblage

Mendip Limestone Grasslands SAC

EC Directive 92/43 on the Conservation of Natural Habitats and of Wild Fauna and Flora

Citation for Special Area of Conservation (SAC)

Name: Mendip Limestone Grasslands

Unitary Authority/County: North Somerset, Somerset

SAC status: Designated on 1 April 2005

Grid reference: ST401557

SAC EU code: UK0030203

Area (ha): 417.47

Component SSSI: Brean Down SSSI, Crook Peak to Shute Shelve Hill SSSI, Uphill Cliff SSSI

Site description:

This site comprises coastal and inland sections of the Carboniferous Limestone outcrops of the Mendips. It contains a wide range of habitats including ancient and secondary semi-natural broadleaved woodland, unimproved calcareous grassland and a complex mosaic of calcareous grassland and acidic dry dwarf-shrub heath.

The coastal headland and inland hills support the largest area of sheep's-fescue – carline-thistle (*Festuca ovina* – *Carlina vulgaris*) grassland in England, including two sub-types (the dwarf sedge *Carex humilis* and honewort *Trinia glauca* sub-communities) known from no other site in the UK. Areas of short-turf sheep's-fescue – meadow oat-grass *Helictotrichon pratense* grassland also occur inland. The site is exceptional in that it supports a number of rare and scarce vascular plants typical of the oceanic southern temperate and Mediterranean elements of the British flora. These include white rock-rose *Helianthemum apenninum*, Somerset hair-grass *Koeleria vallesiana* and honewort. Transitions to limestone heath situated on flatter terrain also occur. Heath species such as heather *Calluna vulgaris*, bell heather *Erica cinerea* and western gorse *Ulex gallii* are well represented and bracken *Pteridium aquilinum* is often locally dominant.

Rose Wood and King's Wood (in Crook Peak to Shute Shelve Hill SSSI) are ancient woodlands. Canopy species include ash *Fraxinus excelsior*, pedunculate oak *Quercus robur*, small-leaved lime *Tilia cordata* and common whitebeam *Sorbus aria* agg. The understorey is dominated by hazel *Corylus avellana* with some field maple *Acer campestre* and spindle *Euonymus europaeus*. Ground flora species include

dog's mercury *Mercurialis perennis*, columbine *Aquilegia vulgaris* and meadow saffron *Colchicum autumnale*. The nationally rare purple gromwell *Lithospermum purpureocaeruleum* occurs at Rose Wood.

Qualifying habitats: The site is designated under **article 4(4)** of the Directive (92/43/EEC) as it hosts the following habitats listed in Annex I:

- Tilio-Acerion* forests of slopes, screes and ravines. (Mixed woodland on base-rich soils associated with rocky slopes)*
- Caves not open to the public
- European dry heaths
- Semi-natural dry grasslands and scrubland facies: on calcareous substrates (*Festuco-Brometalia*). (Dry grasslands and scrublands on chalk or limestone)

Qualifying species: The site is designated under **article 4(4)** of the Directive (92/43/EEC) as it hosts the following species listed in Annex II:

- Greater horseshoe bat *Rhinolophus ferrumequinum*

Annex I priority habitats are denoted by an asterisk (*).

Conservation objectives:

With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;

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.**

Qualifying Features:

H4030. European dry heaths

H6210. Semi-natural dry grasslands and scrubland facies: on calcareous substrates (*Festuco-Brometalia*); Dry grasslands and scrublands on chalk or limestone

H8310. Caves not open to the public

H9180. *Tilio-Acerion* forests of slopes, screes and ravines; Mixed woodland on base-rich soils associated with rocky slopes*

S1304. *Rhinolophus ferrumequinum*; Greater horseshoe bat

North Somerset and Mendip Bats SAC

Details on the site

EC Directive 92/43 on the Conservation of Natural Habitats and of Wild Fauna and Flora

Citation for Special Area of Conservation (SAC)

Name: North Somerset and Mendip Bats

Unitary Authority/County: Bath and North East Somerset, North Somerset, Somerset

SAC status: Designated on 1 April 2005

Grid reference: ST480544

SAC EU code: UK0030052

Area (ha): 561.19

Component SSSI: Banwell Caves SSSI, Banwell Ochre Caves SSSI, Brockley Hall Stables SSSI, Compton Martin Ochre Mine SSSI, King's Wood and Urchin Wood SSSI, The Cheddar Complex SSSI, Wookey Hole SSSI

Site description:

The Cheddar complex and Wookey Hole areas support a wide range of habitats which provide feeding grounds for bats. These include semi-natural dry grasslands of which the principal community present is sheep's-fescue – meadow oat-grass (*Festuca ovina* – *Helictotrichon pratense*) grassland which occurs on rock ledges and on steep slopes with shallow limestone soil, especially in the dry valleys and gorges and on the south-facing scarp of the Mendips. King's Wood and Urchin Wood have developed over limestone which outcrops in parts of the site and forms a steep scarp to the south-east. There is mostly oak *Quercus robur* and ash *Fraxinus excelsior* woodland, though some areas are dominated by small-leaved lime *Tilia cordata* with both maiden and coppice trees. Other canopy trees include yew *Taxus baccata*, cherry *Prunus avium* and wild service tree *Sorbus torminalis*. There is a rich ground flora including many ferns and mosses.

The limestone caves and mines of the Mendips and the north Somerset hills provide a range of important breeding and hibernation sites for lesser horseshoe bat *Rhinolophus hipposideros* and greater horseshoe bat *Rhinolophus ferrumequinum*.

Qualifying habitats: The site is designated under **article 4(4)** of the Directive (92/43/EEC) as it hosts the following habitats listed in Annex I:

- Tilio-Acerion* forests of slopes, screes and ravines. (Mixed woodland on base-rich soils associated with rocky slopes)*
- Caves not open to the public
- Semi-natural dry grasslands and scrubland facies: on calcareous substrates (*Festuco-Brometalia*). (Dry grasslands and scrublands on chalk or limestone)

Qualifying species: The site is designated under **article 4(4)** of the Directive (92/43/EEC) as it hosts the following species listed in Annex II:

- Greater horseshoe bat *Rhinolophus ferrumequinum*
- Lesser horseshoe bat *Rhinolophus hipposideros*

Annex I priority habitats are denoted by an asterisk (*).

Conservation objectives:

With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;

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.**

Qualifying Features:

H6210. Semi-natural dry grasslands and scrubland facies: on calcareous substrates (*Festuco-Brometalia*); Dry grasslands and scrublands on chalk or limestone

H8310. Caves not open to the public

H9180. *Tilio-Acerion* forests of slopes, screes and ravines; Mixed woodland on base-rich soils associated with rocky slopes*

S1303. *Rhinolophus hipposideros*; Lesser horseshoe bat

S1304. *Rhinolophus ferrumequinum*; Greater horseshoe bat

Avon Gorge Woodlands SAC

Details on the site

EC Directive 92/43 on the Conservation of Natural Habitats and of Wild Fauna and Flora

Citation for Special Area of Conservation (SAC)

Name: Avon Gorge Woodlands

Unitary Authority/County: City of Bristol, North Somerset

SAC status: Designated on 1 April 2005

Grid reference: ST560741

SAC EU code: UK0012734

Area (ha): 152.35

Component SSSI: Avon Gorge SSSI

Site description:

The Avon Gorge is in south-west England. Natural cliffs, quarries and scree of Carboniferous limestone dramatically rise about 100m either side from the tidal River Avon, with grassland and woodland where slopes are less sheer. The site is important because of the small-leaved lime *Tilia cordata* woodland and the associated species-rich transitions to scrub and herb-rich calcareous grasslands. The open limestone grassland and cliff ledges support a high number of uncommon species, including rare whitebeams *Sorbus* spp., with two unique to the Avon Gorge, *S. bristoliensis* and *S. wilmottiana*, and other important plants, such as Bristol rock-cress *Arabis scabra* and honewort *Trinia glauca*. Small groves of yew *Taxus baccata* also occur on some of the stonier situations.

Qualifying habitats: The site is designated under **article 4(4)** of the Directive (92/43/EEC) as it hosts the following habitats listed in Annex I:

- Tilio-Acerion* forests of slopes, screes and ravines (mixed woodland on base-rich soils associated with rocky slopes)*
- Semi-natural dry grasslands and scrubland facies: on calcareous substrates (*Festuco-Brometalia*) (dry grasslands and scrublands on chalk or limestone)

Annex I priority habitats are denoted by an asterisk (*)

Conservation objectives

With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;

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**

This document should be read in conjunction with the accompanying *Supplementary Advice* document, which provides more detailed advice and information to enable the application and achievement of the Objectives set out above.

Qualifying Features:

H6210. Semi-natural dry grasslands and scrubland facies: on calcareous substrates (*Festuco-Brometalia*); Dry grasslands and scrublands on chalk or limestone

H9180. *Tilio-Acerion* forests of slopes, screes and ravines; Mixed woodland on base-rich soils associated with rocky slopes*

Appendix C

Map showing the European Sites in North Somerset which were considered

(Special Protection Areas are shown in red, Special Areas of Conservation in blue, the district boundary in green).



