

Date: 12 May 2017  
Our ref: 215301  
Your ref: -



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Dear Mr Analey

### **Full HRA of Site Allocations Plan for North Somerset**

Thank you for your consultation on the above dated 05 May 2017 which was received by Natural England on the same date.

We have considered the HRA and concur with the Council's conclusion that the Plan would not have likely significant effects on the European sites, alone or in-combination with other relevant plans or projects. This conclusion has been reached on the basis of the avoidance and mitigation measures identified in the HRA.

We would also like to make the following comments:

#### **Bat SAC Guidance**

Natural England welcomes the production of the Bat SAC guidance, which provides a detailed and practical guide for the Council, developers and other interested parties. It will help to ensure the interests of North Somerset and Mendip Bat SAC are understood and a consistent and coordinated approach is taken to its long-term protection, whilst enabling the development requirements for North Somerset to be met. We would like to commend the Council and Larry Burrows, its author, on this document, which Natural England has assisted in preparing and fully endorses.

It will be important to monitor the effectiveness of the bat guidance, which will also need to be updated to reflect new evidence in due course. Natural England would welcome the opportunity to discuss an appropriate mechanism for achieving this with the Council and relevant neighbouring (competent) authorities.

#### **Severn Estuary – Birnbeck Island**

We are pleased the HRA recognises the need to consider the effects of new development on the Severn Estuary designated site and has taken account of the waterbird roost project findings.

As noted in the HRA; Birnbeck Pier and Royal Pier Hotel sites are over a kilometre away from primary high tide roosts used by SPA bird species. Nevertheless the construction and long-term occupation of 50 houses on Birnbeck Island does have implications for the Severn Estuary SPA, SAC and Ramsar site, which lies immediately adjacent to this allocation. For example there is potential for disturbance to SPA birds' species to result from construction activities and/or for pollution or damage to occur that adversely affects SAC habitats and/or qualifying fish species.

Natural England acknowledges the distance of Birnbeck Island from high tide roosts and that it is already largely developed; however this suggests its redevelopment will require considerable

demolition works and removal of materials to the mainland, ahead of construction works and final occupation of housing. Natural England would therefore wish to see a clear reference in the Plan policy for this allocation to the proximity of the Severn Estuary European site, its sensitivities and the need for suitable mitigation measures to be employed in future development in this location. We would recommend the following wording: *“As an island site surrounded by the Severn Estuary European site, future development at this location will need to take account of the sensitivity of the location and the need for suitable mitigation measures.”*

Natural England has discussed this matter with the Council and we understand the intention is to supplement/amend the relevant policy for this allocation accordingly.

If you have any queries relating to the advice in this letter please contact me on 07900 608311.

Yours sincerely

Amanda Grundy  
Somerset, Avon & Wiltshire Area Team