

Chesil Bank Neighbourhood Plan

Habitats Regulation Assessment

Chesil Bank Parish Council

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1. Introduction

Background to the Project

- 1.1 AECOM was appointed by Chesil Bank Parish Council to assist in undertaking a Habitats Regulations Assessment (HRA) for the Chesil Bank Neighbourhood Plan (NP). This is to inform the Parish Council and Dorset Council of the potential effects of the NP development on European sites and how they are being or should be addressed in the draft NP.

Legislative Framework

- 1.2 The UK left the EU on 31 January 2019 under the terms set out in the European Union (Withdrawal Agreement) Act 2020 (“the Withdrawal Act”). This established a transition period, which ended on 31 December 2020. The Withdrawal Act retains the body of existing EU-derived law within our domestic law. During the transition period EU law applies to and in the UK. The most recent amendments to the Habitats Regulations – the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 – make it clear that the need for HRA has continued after the end of the Transition Period.
- 1.3 Under the Regulations, an appropriate assessment is required, where a plan or project is likely to have a significant effect upon an international site, either individually or in combination with other projects. The Directive is implemented in the UK by the Conservation of Habitats and Species Regulations 2017 (as amended) (the “Habitats Regulations”).

The legislative basis for Appropriate Assessment

Conservation of Habitats and Species Regulations 2017 (as amended)

With specific reference to Neighbourhood Plans, Regulation 106(1) states that:

‘A qualifying body which submits a proposal for a neighbourhood development plan must provide such information as the competent authority [the Local Planning Authority] may reasonably require for the purposes of the assessment under regulation 105 [which sets out the formal process for determination of ‘likely significant effects’ and the ‘appropriate assessment’]...’.

- 1.4 It is therefore important to note that this report has two purposes:
- To assist the Qualifying Body (Chesil Bank Parish Council) in preparing their plan by recommending (where necessary) any adjustments required to protect international sites, thus making it more likely their plan will be deemed compliant with the Conservation of Habitats and Species Regulations 2017 (as amended); and
 - On behalf of the Qualifying Body, to assist the Local Planning Authority (Dorset Council) to discharge their duty under Regulation 105 (in their role as ‘plan-making authority’ within the meaning of that regulation) and Regulation 106 (in their role as ‘competent authority’).
- 1.5 As ‘competent authority’, the legal responsibility for ensuring that a decision of ‘likely significant effects’ is made, for ensuring an ‘appropriate assessment’ (where required) is undertaken, and for ensuring Natural England are consulted,

falls on the local planning authority and the Neighbourhood Plan examiner. However, they are entitled to request from the Qualifying Body the necessary information on which to base their judgment and that is a key purpose of this report.

- 1.6 Over the years the phrase 'Habitats Regulations Assessment' has come into wide currency to describe the overall process set out in the Conservation of Habitats and Species Regulations from screening through to Imperative Reasons of Overriding Public Interest (IROPI). This has arisen in order to distinguish the process from the individual stage described in the law as an 'Appropriate Assessment'. Throughout this report we use the term Habitats Regulations Assessment for the overall process.

2. Methodology

Introduction

- 2.1 The HRA has been carried out with reference to the general EC guidance on HRA (European Commission, 2001) and general guidance on HRA published by the UK government in 2021 (Department for Environment, Food & Rural Affairs, 2021).
- 2.2 Plate 1 below outlines the stages of HRA according to current Department for Levelling Up, Housing & Communities guidance. The stages are essentially iterative, being revisited as necessary in response to more detailed information, recommendations, and any relevant changes to the Plan until no significant adverse effects remain.

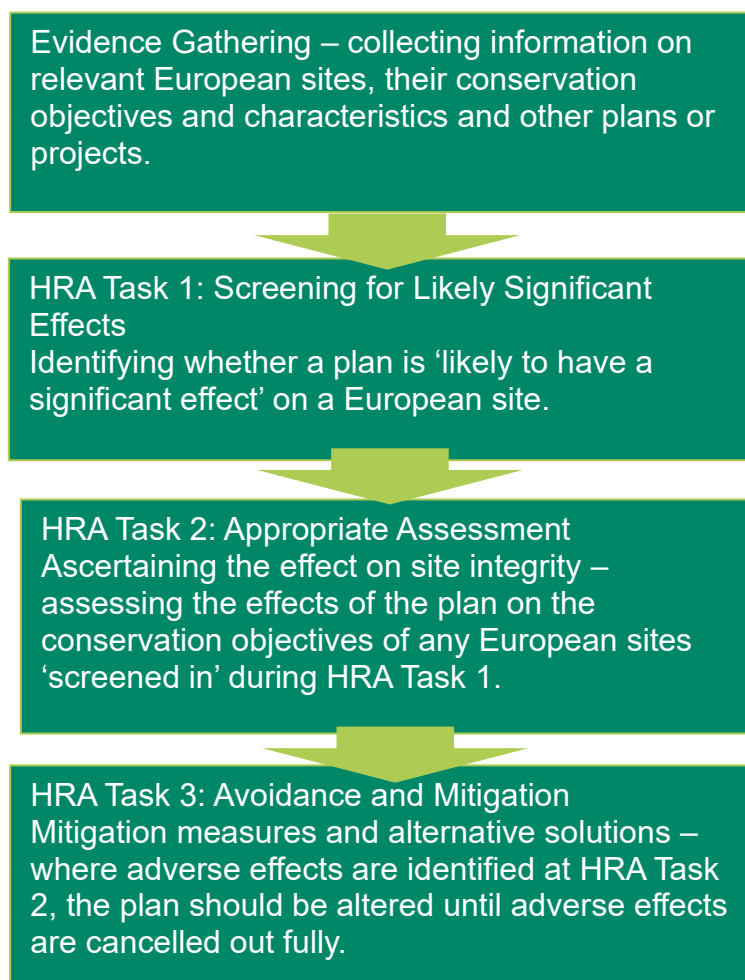


Plate 1. Four Stage Approach to Habitats Regulations Assessment (Department for Environment, Food & Rural Affairs, 2021)

HRA Task 1 – Likely Significant Effects (LSE)

2.3 Following evidence gathering, the first stage of any Habitats Regulations Assessment is a Likely Significant Effect (LSE) test - essentially a risk assessment to decide whether the full subsequent stage known as Appropriate Assessment is required. The essential question is:

“Is the project, either alone or in combination with other relevant projects and plans, likely to result in a significant effect upon European sites?”

2.4 The objective is to 'screen out' those plans and projects that can, without any detailed appraisal, be said to be unlikely to result in significant adverse effects upon European sites, usually because there is no mechanism for an adverse interaction with European sites. This stage is undertaken in Chapter 4 of this report.

HRA Task 2: Appropriate Assessment (AA)

2.5 Where it is determined that a conclusion of 'no likely significant effect' cannot be drawn, the analysis has proceeded to the next stage of HRA known as Appropriate Assessment. Case law has clarified that 'Appropriate Assessment' is not a technical term. In other words, there are no particular technical analyses, or level of technical analysis, that are classified by law as belonging to

Appropriate Assessment rather than determination of likely significant effects. It literally means *'whatever level of further assessment is appropriate to form a conclusion regarding effects on the integrity of relevant European sites'*.

- 2.6 During July 2019 the Department for Levelling Up, Housing and Communities (DLHC) published guidance for Appropriate Assessment (Department for Levelling Up, Housing and Communities, 2019). Paragraph: 001 Reference ID: 65-001-20190722 explains: *'Where the potential for likely significant effects cannot be excluded, a competent authority must make an appropriate assessment of the implications of the plan or project for that site, in view of the site's conservation objectives. The competent authority may agree to the plan or project only after having ruled out adverse effects on the integrity of the habitats site. Where an adverse effect on the site's integrity cannot be ruled out, and where there are no alternative solutions, the plan or project can only proceed if there are imperative reasons of over-riding public interest and if the necessary compensatory measures can be secured'*.
- 2.7 One of the key considerations during Appropriate Assessment is whether there is available mitigation that would address the potential effect.

HRA Task 3 – Avoidance and Mitigation

- 2.8 Where necessary, measures are recommended for incorporation into the Plan in order to avoid or mitigate adverse effects on European sites. There is considerable precedent concerning the level of detail that a Neighbourhood Plan document needs to contain regarding mitigation for recreational impacts on European sites. The implication of this precedent is that it is not necessary for all measures that will be deployed to be fully developed prior to adoption of the Plan, but the Plan must provide an adequate policy framework within which these measures can be delivered.
- 2.9 In evaluating significance, AECOM has relied on professional judgement and the LP HRA regarding development impacts on the European sites considered within this assessment.
- 2.10 When discussing 'mitigation' for a Neighbourhood Plan document, one is concerned primarily with the policy framework to enable the delivery of such mitigation rather than the details of the mitigation measures themselves since the Local Development Plan document is a high-level policy document. A Neighbourhood Plan is a lower level constituent of a Local Development Plan.

3. Physical Scope of the HRA

Introduction

- 3.1 There is no guidance that dictates the general physical scope of an HRA of a Plan document. Therefore, in considering the physical scope of the assessment, we were guided primarily by the identified impact pathways (called the source-pathway-receptor model).
- 3.2 Briefly defined, impact pathways are routes by which the implementation of a project can lead to an effect upon a European designated site. An example of this would be visual and noise disturbance arising from the construction/decommissioning work or operational phase associated with a project. If there are sensitive ecological receptors within a nearby European site (e.g. non-breeding overwintering birds), this could alter their foraging and roosting behaviour and potentially affect the site's integrity. For some impact pathways (notably air pollution) there is guidance that sets out distance-based zones required for assessment. For others, a professional judgment must be made based on the best available evidence.

European Sites Relevant to the Neighbourhood Plan

- 3.3 In the case of the Chesil Bank NP, it has been determined that the European sites identified in Table 1 require consideration. The background to these European sites are discussed in **Appendix A**.
- 3.4 The locations of the below European sites in relation to the DDNP boundary and allocated sites are illustrated in **Appendix B, Figure 1**.

Table 1. European site descriptions and distance from Chesil Bank NP area

Site Name/Designation	Site Description	Distance from Chesil Bank Neighbourhood Area
Chesil Beach and The Fleet SPA	Chesil Beach and The Fleet SPA, Ramsar and SAC consists of a long linear shingle beach enclosing a	Within Parishes
Chesil Beach & The Fleet Ramsar	brackish lagoon on the south coast of England in Dorset.	
Chesil & The Fleet SAC	The site comprises of The Fleet, the largest and best example of a barrier-built saline lagoon and Chesil Bank, one of the three major shingle structures in the UK. The salinity gradient, peculiar hydrographic regime and varied substrates, together with associated reedbed and intertidal habitats have resulted in The Fleet being extraordinarily rich in wildlife, supporting large numbers of wintering waterbirds,	

Site Name/Designation	Site Description	Distance from Chesil Bank Neighbourhood Area
	including Wigeon. Chesil Bank is an important breeding site for Little Terns and supports important shingle plant communities.	
Crookhill Brick Pit SAC	Crookhill Brick Pit SAC is a disused brick pit which has important geological features and contains several ponds that support great crested newts. The site also contains a variety of habitats used by the newt, including grassland, scrub and quarry spoil.	Borders the NP area to the east
Isle of Portland to Studland Cliffs SAC	The outstanding geology supports extensive swathes of calcareous grassland with early spider orchid and the endemic early gentian; sea cliff vegetation on hard rocks and a diversity of habitat on seepage rich slumping clays. Sea caves and mine adits, a legacy of the stone quarrying industry, have created a highly ephemeral drift line on sandy shingle throughout the site	5.7 km east of the NP area
West Dorset Alder Woods SAC	The West Dorset Alder Woods SAC comprises mixed ash-alder woods found along the sinuous valleys in West Dorset. They have developed along the headwaters of alkaline streams and seepages having their origin in the chalk downland and issuing from the underlying Upper Greensand at its junction with the Gault Clay. The wetter woods or carr form transitions to drier oak-ash woodland as well as associated further transitions to base-rich fens, reedswamp, fen meadow and acid grassland.	8.5 km north of the NP area
Cerne & Sydling Downs SAC	Cerne & Sydling Downs SAC consists of a large area of semi-natural dry grassland on the west Dorset chalk. Dry valley slopes with a variety of aspects support extensive examples of CG2 <i>Festuca ovina</i> – <i>Avenula pratensis</i> grassland in the south-west of its UK	8.7 km north of the NP area

Site Name/Designation	Site Description	Distance from Chesil Bank Neighbourhood Area
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range. A particular feature of this site is the presence of the *Succisa pratensis* – *Leucanthemum vulgare* sub-community, especially on south- and west-facing slopes. This type of calcareous grassland is almost entirely restricted to parts of Wiltshire and Dorset. On south-west-facing slopes, the nationally scarce dwarf sedge *Carex humilis* can be abundant in this sub-community.

This site supports a large marsh fritillary *Euphydryas aurinia* metapopulation composed of two large and one smaller sub-populations which regularly expand into other nearby areas in favourable years. These colonies occupy calcareous downland situations and complement the wet grassland habitats of the other Dorset strongholds.

Dorset Heathlands SPA	The Dorset heathlands designated for its extensive lowland heathland.	9.7 km east of the NP area
Dorset Heathland Ramsar	Formerly a single tract divided only by river valleys it is now fragmented. The heathlands comprise a wide range of different habitat types related to	
Dorset Heaths SAC	variation in soils, hydrology, water chemistry and land use history.	
	The SPA is also significant for breeding birds including European nightjar <i>Caprimulgus europaeus</i> , Dartford warbler <i>sylvia undata</i> , woodlark <i>Lullula arborea</i> , hen harrier <i>Circus cyaneus</i> , and merlin <i>Falco columbarius</i> and the SAC for southern damselfly <i>Coenagrion mercuriale</i> and great crested newt <i>Triturus cristatus</i> .	
Sidmouth to West Bay SAC	Sidmouth to West Bay is an example of a highly unstable soft cliff coastline subject to mudslides and landslips. The principal rock types are soft mudstones, clays and silty limestones, with a small chalk outlier in the west.	10 km west of the NP area

Site Name/Designation	Site Description	Distance from Chesil Bank Neighbourhood Area
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Vegetation is very varied and includes pioneer communities on recent slips, calcareous grassland and scrub on detached chalk blocks, and extensive self-sown woodland dominated by ash *Fraxinus excelsior* or sycamore *Acer pseudoplatanus*. This mosaic of habitats makes this site rich in invertebrates, especially bees and wasps. The Red Data Book lichen *Parmelia quercina* occurs on ash *Fraxinus excelsior* trees.

Relevant Impact Pathways

- 3.5 The European sites that are described in Table one and Appendix A are located within 10 km radius of the Chesil Bank NP area.
- 3.6 Based upon Natural England Site Improvement Plans and Supplementary Advice on Conservation Objectives, there are several pathways that require consideration regarding increased development within the Chesil Bank NP area and said European sites. These are:
- Public access and recreation
 - Functionally linked land
 - Water pollution
 - Air Quality

'In Combination' Scope

- 3.7 It is a requirement of the Regulations that the impacts of any land use plan being assessed are not considered in isolation but in combination with other plans and projects that may also be affecting the European site(s) in question.
- 3.8 When undertaking this part of the assessment it is essential to bear in mind the principal intention behind the legislation, i.e., to ensure that those projects or plans (which in themselves may have minor impacts) are not simply dismissed on that basis but are evaluated for any cumulative contribution they may make to an overall significant effect. In practice, in-combination assessment is therefore of greatest relevance when the plan or policy would otherwise be screened out because its individual contribution is inconsequential.
- 3.9 It is a requirement of the Regulations that the impacts and effects of any land use plan being assessed are not considered in isolation but in combination with other plans and projects that may also be affecting the internationally designated site(s) in question.

3.10 When undertaking this part of the assessment it is essential to bear in mind the principal intention behind the legislation i.e., to ensure that those projects or plans which in themselves have minor impacts are not simply dismissed on that basis but are evaluated for any cumulative contribution they may make to an overall significant effect. In practice, in combination assessment is therefore of greatest relevance when the plan would otherwise be screened out because its individual contribution is inconsequential. The overall approach is to exclude the risk of there being unassessed likely significant effects in accordance with the precautionary principle. This was first established in the seminal Waddenzee¹ case.

3.11 For the purposes of this assessment, we have determined that, due to the nature of the identified impacts, the key other plans and projects with potential for in combination likely significant effects are those schemes that have the following impact pathways: Loss of functionally linked land, recreational pressure, air quality impacts, water quality impacts and water quantity level and flow. The following plans have been assessed for their in-combination impact to interact with the Chesil Bank Neighbourhood Plan:

- Emerging Dorset Local Plan (Options Consultation) (Dorset Council, 2021)
- West Dorset, Weymouth and Portland Local Plan (Dorset Council, 2015)

¹ Waddenzee case (Case C-127/02, [2004] ECR-I 7405)

4. Test of Likely Significant Effects

Summary of Policy Screening

4.1 Chesil Bank Parish Council covers the four parishes of Abbotsbury, Fleet (FL), Langton Herring (LH) and Portesham (PO). The Neighbourhood Area therefore includes all four parishes. Three of these parishes border and partly include Chesil & The Fleet SAC and Chesil Beach & The Fleet SPA. The Chesil Bank Neighbourhood Plan (CBNP) has a total of 31 policies. Of these policies five have the potential to cause a likely significant effect:

- CBNP5 – Land east of North Mead Farm (PO-03) – policy does not cite a number of dwellings for the site in Portesham but the supporting text indicates 3-6 dwellings;
- CBNP6 – Land adjoining Stone Cottage (FL-05) – allocates a single dwelling in Fleet;
- CBNP7 – Land at Higher Farmhouse (LH-01) – allocates a single dwelling in Langton Herring;
- CBNP8 – Land adjoining 4 Court Close (LH-02) – allocates a single dwelling in Langton Herring; and,
- CBNP10 – Sustainable business growth – is a development management policy for employment development. However, it also relays that new tourist and care-related accommodation will be supported.

4.2 The test of likely significant effects will focus on these policies with regards to the vulnerabilities of the European sites within Table 1. The impact pathways relating to the European sites vulnerabilities are listed below and will each be discussed:

- Recreational Pressure;
- Functionally Linked Land;
- Air Quality; and,
- Water Resources and Water Quality.

Recreational Pressure

4.3 Increased development could lead to higher numbers of visitors to European Sites. For example, the nature, scale, timing and duration of some human activities can result in the disturbance of birds at a level that may substantially affect their behaviour, and consequently affect the long-term viability of the population. This is possible for European Sites to be visited by new residents in combination with the surrounding villages. Recreational use of a European site has the potential to:

- Prevent appropriate management or exacerbate existing management difficulties;
- Cause damage through erosion and fragmentation;
- Cause eutrophication as a result of dog fouling; and
- Cause disturbance to sensitive species, particularly ground-nesting birds and wintering wildfowl.

Chesil Beach & The Fleet

- 4.4 Chesil Beach & The Fleet SAC/SPA/Ramsar is located within the Chesil Bank Neighbourhood Area and consists a long linear shingle beach, enclosing a brackish lagoon, with the SAC being designated for a number of habitats including coastal shingle vegetation and annual vegetation of the drift lines. The SPA is designated for breeding little tern and over wintering wigeon and the Ramsar is designated for a number of rare and scarce wetland plants and invertebrates. The European sites are privately owned and managed as a nature reserve. Part of Chesil is Crown Common Land and while the majority of the site is largely inaccessible to casual visitors, the south-western part of the site is subject to considerable visitor recreational pressure with regards to SPA features (Liley, et al., 2015).
- 4.5 Recreational pressure stemming from the CBNP is unlikely to act upon the Chesil Beach European sites alone due to the small number of dwellings allocated within the plan (three sites with one dwelling each and one site with an unconfirmed but likely 3-6 dwellings). However, as the site is already experiencing high pressure from recreation further increases in net new dwellings from the CBNP may act in combination with other developments from neighbouring plans including other Neighbourhood Plans and the Dorset Plan. Therefore, the CBNP could produce likely significant effects in combination with other plans and project and **will therefore be discussed further within the Appropriate Assessment.**

Dorset Heathlands

- 4.6 The Dorset Heathlands SAC is designated for its extensive lowland heathland, which forms one of the best developed and most significant tracts of heathland in the lowlands of the UK. The SPA is designated for breeding nightjar *Caprimulgus europaeus*, woodlark *Lullula arborea*, Dartford warbler *Sylvia undata* as well as wintering hen harrier *Circus cyaneus* and merlin *Falco columbarius*.
- 4.7 It is widely understood that the Dorset Heathlands European sites are vulnerable to recreational pressure. The Supplementary Conservation Advice states; *“without avoidance measures, the cumulative effect of new housing would be likely to lead to an increase in urban pressures (e.g. an increase in wildfires, damaging recreational uses, introduction of incompatible plants and animals, loss of vegetation and soil erosion and disturbance by humans and their pets) on parts of the SPA with possible harmful effects to [qualifying features].”*
- 4.8 A strategic approach to avoiding and mitigating the potential impacts of increasing recreational pressure has been developed for the Dorset Heathlands. This is set out within the Dorset Heathlands Planning Framework Supplementary

Planning Document (SPD) (Dorset Council, 2016). The SPD details that *“it is the view of Natural England that the cumulative effect of a net increase of dwellings up to 5 kilometres from protected heathland in Dorset would have a significant effect on Dorset’s lowland heaths that are covered by several international designations.”*

- 4.9 Given that the Dorset Heathlands European sites are 9.7 km from the Chesil Bank NP area it is regarded that a net increase in new dwellings within the NP area is out of the core catchment zone and is unlikely to have a significant effect on increasing recreational pressure within the European sites even in combination with other projects and plans. Therefore, the Chesil Bank NP will not cause a likely significant effect upon the European sites either alone or in combination with other plans and projects and can be screened out.

Isle of Portland to Studland Cliffs SAC

- 4.10 The Isle of Portland to Studland Cliffs SAC supports species rich calcareous grassland with particularly large populations of several species that are scarce in the UK. The South West Coastal Path runs the length of the Isle of Portland to Studland Cliffs SAC. Over 1 million people walk some of the South West Coastal Path between Poole and Lyme Regis each year. Visitor numbers for individual locations are not generally available, although it is likely that recreational pressure is locally high. Portland is also renowned for its sport climbing, with over 900 routes of varying difficulty².
- 4.11 Recreational pressure at the SAC relates mainly to climbing activities and coastal walking (with and without dogs) (Natural England, 2019). Climbing activities can damage ledges and the vegetation on them through trampling and the abrasion of ropes, although climbing is a national niche activity rather than something directly relatable to local population growth. Additionally, the volume of footfall and the narrow depth of SAC in some areas can cause rapid trampling of calcareous grassland as well as nutrient enrichment from dog faeces degrading calcareous grassland to neutral grassland.
- 4.12 The Supplementary Conservation Advice (Natural England, 2019) highlights that *“the type and frequency of activity needs to be monitored and action taken to reduce pressure where it is having an adverse impact”*. This suggests that although there is a pressure, the extent or whether this significantly affects the SAC is not yet understood.
- 4.13 The distance over which visitors will travel to coastal sites can vary extensively. A small selection of visitor studies undertaken by Footprint Ecology provides a view of this variation. Poole Harbour visitor surveys recorded a core catchment (i.e the distance from the home postcode to interview location of 75% of interviewees) of 4.8 km (Panter & Liley, 2016), the Solent visitor studies showed a core catchment of 5.0 km (Liley & Panter, 2018), Thanet Coast and Sandwich Bay in Kent a core catchment of 9.8 km (Fearnley, et al., 2014) and Debden Estuary in Suffolk recorded a core catchment of 14.2 km from visitor studies (Lake, et al., 2014). Given the lack of visitor data for the Portland area, professional judgement would regard the areas in a similar geographical location to Portland (e.g. the south coast), such as Poole Harbour and the Solent to be somewhat similar in terms of visitor attraction and therefore coastal areas around

² <https://rockandsun.com/climbing-locations/uk/portland/> [Accessed 20 March 2019]

Portland are likely to have a similar core catchment to these locations e.g. 75% of visitors living within 5 km of the European sites.

- 4.14 Portland to Studland Cliffs SAC is 5.7 km from the eastern boundary of the NP area and 8.4 km from the nearest allocated site in Fleet (a single dwelling). Given the distance from the nearest allocation site and the very small number of dwellings in the Neighbourhood Plan as a whole (a likely maximum of 6-9 dwellings) it is concluded that such a small increase in net new dwellings (which may not necessarily translate into any net increase in population) at this distance from the SAC is likely to be outside of the core catchment of the SAC and inconsequential in scale, and is unlikely to have a significant effect on increasing recreational pressure within the European sites. Therefore, the Chesil Bank NP will not cause a likely significant effect upon the European site either alone or in combination with other plans and projects and can be screened out.

Functionally Linked Land

- 4.15 While most European sites have been geographically defined in order to encompass the key features that are necessary for coherence of their structure and function, this is not the case for all such sites. Due to the highly mobile nature of waterfowl, it is inevitable that areas of habitat of crucial importance to the maintenance of their populations are outside the physical limits of the European site for which they are an interest feature. However, this area will still be essential for maintenance of the structure and function of the interest feature for which the site was designated and land use plans that may affect this land should still therefore be subject to further assessment. This has been underlined by a recent European Court of Justice ruling (C-461/17, known as the Holohan ruling³) which in paragraphs 37 to 40 confirms the need to consider the implications of a plan or project on habitats and species outside the European site boundary provided that those implications are liable to affect the conservation objectives of the site.

Chesil Beach & The Fleet

- 4.16 Areas of functionally linked land typically provide habitat for foraging or other ecological functions essential for the maintenance of the designated population e.g. high tide roost on coastal populations. Functionally linked land may extend up to the maximum foraging distances for the bird species. However, the number of birds foraging will tend to decrease further away from the protected site and thus the importance of the land to the maintenance of the designated population will decrease.
- 4.17 The site allocation at Fleet for a single dwelling is located approximately 400m from the Chesil Beach & The Fleet European sites. Wigeon which comprises part of the designation for the SPA can forage up to a maximum of 2km (Natural England, 2019) from the designated sites and wetland areas, or grassland borders to wetlands, within this distance could have potential as functionally linked land. As a rule of thumb functionally linked land is usually considered significant where the parcel of land is over 2 ha in size and/or large enough to accommodate at least 1% of the SPA designation (SPA designation 4594 over wintering individuals (JNCC, 2017)). The parcel of land within which the single

³ The Holohan ruling also requires all the interest features of the European sites discussed to be catalogued (i.e. listed) in the HRA. That is the purpose of Appendix B.

dwelling is allocated is approximately 1.6 ha in size and appears from aerial mapping (www.magic.defra.gov.uk) to be used for arable crops which would not be used by wigeon. The land is located adjacent to several other residential dwellings with a woodland strip to the west and south of the next field, which blocks the view across to the SPA. Wigeon generally forage upon short-cropped grass in areas with an open aspect and no trees nearby (Cheshire & Wirrel Ornithological Society, 2008). Given this information on foraging suitability and the size of the plot of land, it is considered unlikely that the location of the site allocation would be considered functionally linked to the Chesil Beach & The Fleet SPA, therefore would not cause any likely significant effects either alone or in combination with other plans or projects and can be screened out.

Air Quality

- 4.18 The main pollutants of concern for European sites are oxides of nitrogen (NO_x), ammonia (NH₃) and sulphur dioxide (SO₂). Other pollutants that are of relevant to human health (e.g. particulates such as PM₁₀) are not relevant to impacts on ecological receptors. NO_x can have a directly toxic effect upon vegetation. In addition, greater NO_x or ammonia concentrations within the atmosphere will lead to greater rates of nitrogen deposition to soils. An increase in the deposition of nitrogen from the atmosphere to soils is generally regarded to lead to an increase in soil fertility, which can have a serious deleterious effect on the quality of semi-natural, nitrogen-limited terrestrial habitats.
- 4.19 Sulphur dioxide emissions are overwhelmingly influenced by the output of power stations and industrial processes that require the combustion of coal and oil as well as (particularly on a local scale) shipping.
- 4.20 Ammonia emissions are dominated by agriculture, with some chemical processes also making notable contributions including some vehicles. NO_x emissions are dominated by the output of vehicle exhausts (more than half of all emissions). Within a 'typical' housing development, by far the largest contribution to NO_x (92%) will be made by the associated road traffic. Other sources, although relevant, are of minor importance (8%) in comparison⁴. Emissions of NO_x and ammonia could therefore be reasonably expected to increase as a result of greater vehicle use as an indirect effect of the Local Plan.
- 4.21 According to the World Health Organisation, the critical NO_x concentration (critical threshold) for the protection of vegetation is 30 µg m⁻³; the threshold for ammonia is 1-3 µg m⁻³. In addition, ecological studies have determined "critical loads"⁵ of atmospheric nitrogen deposition (that is, NO_x combined with ammonia NH₃). These are bespoke to particular habitats and are available on the Air Pollution Information System apis.ac.uk.
- 4.22 According to the Department of Transport's Transport Analysis Guidance, "Beyond 200m, the contribution of vehicle emissions from the roadside to local pollution levels is not significant"⁶. This is because traffic exhausts are situated only a few inches above the ground and are horizontal to it, such that the vast majority of emitted pollutants are never dispersed far and are very quickly

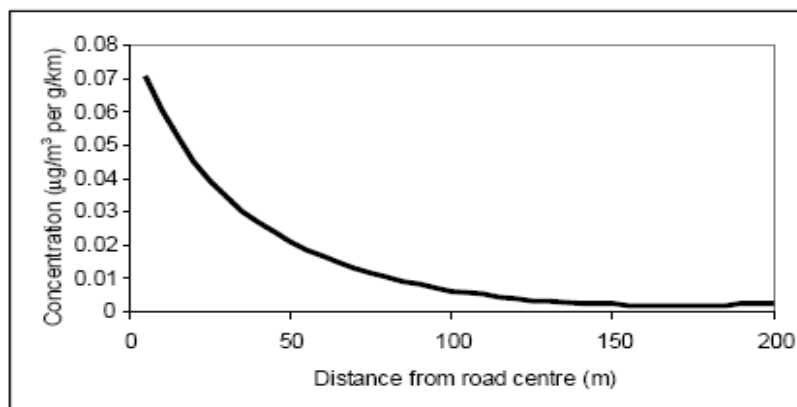
⁴ Proportions calculated based upon data presented in Dore CJ et al. 2005. UK Emissions of Air Pollutants 1970 – 2003. UK National Atmospheric Emissions Inventory. <http://www.airquality.co.uk/archive/index.php>

⁵ The critical load is the rate of deposition beyond which research indicates that adverse effects can reasonably be expected to occur

⁶ www.webtag.org.uk/archive/feb04/pdf/feb04-333.pdf

deposited. This distance is also related to the mix of the exhaust gases, the small dimension of the exhausts and the velocity of the exhaust gases leaving the exhaust.

Plate 2: Traffic contribution to concentrations of pollutants at different distances from a road (Source: DfT)



4.23 This is therefore the distance that has been used throughout this HRA in order to determine whether European sites are likely to be significantly affected by traffic generated by development under the Spatial Strategy.

Chesil Beach & The Fleet

4.24 The A354 (Chesil Beach Road) is immediately adjacent to Chesil & The Fleet SAC and Chesil Beach & The Fleet Ramsar. Both of which are designated for habitat features. Annual drift line vegetation, vegetation on stony banks, lagoonal specialist species and saltmarsh. According to www.magic.gov.uk the main habitat types within 200m of the A354 are saline lagoon, mudflat and coastal vegetated shingle. The habitat types are currently classed (by Natural England with reference to all the following Chesil and The Fleet SSSI units: 1, 2 and 37) (Natural England, 2012-2016) as 'Favourable' (unit 1 and 37) and 'Unfavourable Recovering' (unit 2) The reason behind the impact classification for unit 2 is due to fluctuating populations of little tern and ringed plover that breed on the beach within this unit; the vegetated shingle within this unit is classified as 'Favourable'. According to the Air Pollution Information System (2013-2015) (APIS) the nitrogen critical load for the habitat type perennial vegetation of stony banks (which is part of the coastal vegetated shingle habitat classification) is 8 – 15 Kg/N/ha/yr. The minimum nitrogen deposition calculated for this habitat at this site is 8.5 Kg/N/ha/yr and the maximum is 16.4 Kg/N/ha/yr, with an average of 10.1 Kg/N/ha/yr. All of these deposition rates are above the minimum critical load. The impact of exceedance within this habitat is an increase in tall grasses, decrease in prostrate plants, increased nitrogen leaching, soil acidification and loss of typical lichen species.

4.25 As the deposition of nitrogen is already over the critical load, increasing this deposition could cause deterioration of the habitats and increases in net new dwellings from the CBNP may act in combination with other developments from neighbouring plans. Therefore, the CBNP could produce likely significant effects in combination with other plans and project and **will therefore be discussed further within the Appropriate Assessment.**

Portland to Studland Cliffs SAC

- 4.26 The Isle of Portland to Studland Cliffs SAC is also immediately adjacent to the A354 to the east of Southwell Road and east of Priory Road at the King Barrow disused quarries. MAGIC states that the main habitat type immediately adjacent to the road at King Barrow quarry is lowland calcareous grassland (dry grassland and scrubland facies: on calcareous substrates) and east of Southwell Road lowland calcareous grassland and maritime cliffs and slopes (vegetated sea cliffs of the Atlantic and Baltic coasts). The habitat types are currently classed as, with reference to Isle of Portland SSSI Unit 55 (Natural England, 2011), 'Unfavourable Recovering'. The reason behind the impact classification for Unit 55 is due to invasive cotoneaster and high levels of scrub. However, a three year scrub control plan is in operation and therefore was attributed the 'recovering' assessment. Other herb indicator species are in 'Favourable' condition. However, Unit 39 east of Southwell Road is recorded as 'Favourable' with frequent favourable condition indicator species and an acceptable level of scrub cover. According to APIS the nitrogen critical load for the habitat type semi-natural dry grassland and scrubland facies on calcareous substrates is 15 – 25 Kg/N/ha/yr. The minimum nitrogen deposition calculated for this habitat at this site is 7.5 Kg/N/ha/yr and the maximum is 17.6 Kg/N/ha/yr with an average of 12.5 Kg/N/ha/yr. All but the maximum nitrogen deposition rates are well below the minimum critical load. Vegetated sea cliffs of the Atlantic and Baltic coasts do not have a comparable habitat with established critical loads to enable an estimate.
- 4.27 At the distance of 5.7 km from the NP area at its closest point and further to the roads adjacent to the SAC and with so few net new dwellings, it is unlikely that the increase in population within the NP will extend to an increase in car journeys past these SSSI components alone. But given the deposition of nitrogen is already over the critical load, increasing this deposition could cause deterioration of the habitats and increases in net new dwellings from the CBNP may act in combination with other developments from neighbouring plans. Therefore, the CBNP could produce likely significant effects in combination with other plans and project and **will therefore be discussed further within the Appropriate Assessment.**

Cerne & Sydling Downs SAC

- 4.28 Cerne & Sydling Downs SAC is located adjacent to the A37 (Long Ash Lane) between Frampton and Holywell. Several small areas of the SAC are within 200m of the main road. According to MAGIC, the main habitat type within 200m of the road is lowland calcareous grassland (dry grassland and scrubland facies: on calcareous substrates) with small areas of deciduous woodland. The only section of the SAC within 10km of the Parish is the Hog Cliff SSSI. The condition of Unit 9 of the Hog Cliff SSSI (Natural England, 2013) is also classed as 'Favourable with sufficient positive indicators. The SSSI Unit has also benefited from a scrub control program. According to APIS the nitrogen critical load for the habitat type semi-natural dry grassland and scrubland facies on calcareous substrates is 15 – 25 Kg/N/ha/yr. the minimum nitrogen deposition calculated for this habitat at this site is 23.1 Kg/N/ha/yr and the maximum is 27 Kg/N/ha/yr, with an average of 25.5 Kg/N/ha/yr. All but deposition rates are already over the critical load.
- 4.29 However, at the distance of the almost 10km from the NP area and with so few net new dwellings, it is unlikely that the increase in population within the NP will

extend to an increase in car journeys past this SSSI component alone. But given the deposition of nitrogen is already over the critical load, increasing this deposition could cause deterioration of the habitats and increases in net new dwellings from the CBNP may act in combination with other developments from neighbouring plans. Therefore, the CBNP could produce likely significant effects in combination with other plans and project and **will therefore be discussed further within the Appropriate Assessment.**

Dorset Heathlands

4.30 The only component part of the Dorset Heaths SAC and Dorset Heathlands Ramsar within 10 km of the NP area is Warmwell Heath SSSI, specifically Unit 4 (Natural England, 2009), although Units 1 and 3 are part of the same site. Unit 4 is classified as 'Unfavourable – Recovering', with Unit 3 Unfavourable – Declining' and 1 'Unfavourable – No Change'. The main road through this section of Dorset is the A352 between Dorchester and Wareham. Warmwell Heath SSSI is approximately 1.2km north of this road. However, a smaller B-road the B3390 does pass immediately adjacent to the east of the SSSI. The main habitat type within 200m of the B3390 is lowland heathland (Northern Atlantic Wet Heaths with *Erica Tetralix*). According to APIS the critical load for this habitat is 10 – 20 Kg/N/ha/yr and with the minimum nitrogen deposition at 12 Kg/N/ha/yr the habitat at the SSSI is well above the critical load.

4.31 However, at the distance of the almost 10km from the NP area and with so few net new dwellings, it is unlikely that the increase in population within the NP will extend to an increase in car journeys past this SSSI component alone. But given the deposition of nitrogen is already over the critical load, increasing this deposition could cause deterioration of the habitats and increases in net new dwellings from the CBNP may act in combination with other developments from neighbouring plans. Therefore, the CBNP could produce likely significant effects in combination with other plans and project and **will therefore be discussed further within the Appropriate Assessment.**

Sidmouth to West Bay SAC

4.32 Only a very small section (c. <500m) of this SAC is within 10 km of the NP area. The closest point where the SAC is within 200 m of a main road is around Lyme Regis which is approximately 20 km west of the NP area, as the crow flies and much further by road. At this distance from the NP area and with so few net new dwellings, it is unlikely that the increase in population within the NP will extend to an increase in car journeys past this SAC either alone or in combination with other plans and projects and can be screened out.

West Dorset Alder Woodlands SAC

4.33 The West Dorset Alder Woodlands SAC is recorded as vulnerable to Air Quality as the nitrogen deposition critical load is exceeded for the SAC (Natural England, 2014). Only a few component SSSI Units of the West Dorset Alder Woodland SAC are within 10km of the NP area. There are no main roads within 200 m of any of the SSSI units within 10 km of the NP area and the closest main road to the SAC, further outside of the 10 km buffer is the A356 between Maiden Newton and Crewkerne which is located approximately 215 m east of Toller Porcorum SSSI Unit 5 (Natural England, 2012) which is currently in 'Favourable' condition. Given that there are no main roads within 200 m of the SAC the CBNP does not

present a linking impact pathway and therefore the CBNP cannot cause a likely significant effect either alone or in combination with other plans and projects and can be screened out.

Water Pollution

4.34 Increased amounts of housing or business development can lead to reduced water quality of rivers and estuarine environments. Sewage and industrial effluent discharges can contribute to increased nutrients on European sites leading to unfavourable conditions. In addition, diffuse pollution, partly from urban run-off has been identified during an Environment Agency Review of Consents process and a joint Environment Agency and Natural England evidence review, as being a major factor in causing unfavourable condition of European sites.

4.35 The quality of the water that feeds European sites is an important determinant of the nature of their habitats and the species they support. Poor water quality can have a range of environmental impacts:

- At high levels, toxic chemicals and metals can result in immediate death of aquatic life, and can have detrimental effects even at lower levels, including increased vulnerability to disease and changes in wildlife behaviour. Eutrophication, the enrichment of plant nutrients in water, increases plant growth and consequently results in oxygen depletion. Algal blooms, which commonly result from eutrophication, increase turbidity, and decrease light penetration. The decomposition of organic wastes that often accompanies eutrophication deoxygenates water further, augmenting the oxygen depleting effects of eutrophication. In the marine environment, nitrogen is the limiting plant nutrient and so eutrophication is associated with discharges containing available nitrogen;
- Some pesticides, industrial chemicals, and components of sewage effluent are suspected to interfere with the functioning of the endocrine system, possibly having negative effects on the reproduction and development of aquatic life; and
- Increased discharge of treated sewage effluent can result both in high levels of macroalgal growth, which can smother the mudflats of value to SPA birds and in greater scour (as a result of greater flow volumes).

4.36 At sewage treatment works, additional residential development increases the risk of effluent escape into aquatic environments in addition to consented discharges to the catchment. In many urban areas, sewage treatment and surface water drainage systems are combined, and therefore a predicted increase in flood and storm events could increase pollution risk.

4.37 The following sites are vulnerable to water quality impacts:

- Chesil Beach and The Fleet SPA Ramsar and Chesil and The Fleet SAC
- Crookhill Brick Pit SAC
- Isle of Portland to Studland Cliffs SAC
- West Dorset Alder Woods SAC

- Dorset Heathlands SPA Ramsar and Dorset Heaths SAC
- Sidmouth to West Bay SAC

4.38 Although the increase net new dwellings is small (3 single affordable homes and one site with unconfirmed but likely small number of dwellings) and therefore unlikely to cause an impact on any site alone. The increase in net new dwellings within the CBNP area could act in combination with an increase in net new dwellings outside of the NP area. Therefore, the CBNP could produce likely significant effects in combination with other plans and project and **will therefore be discussed further within the Appropriate Assessment.**

5. Appropriate Assessment In-combination

Recreational Pressure

Chesil Beach & The Fleet

- 5.1 Concern regarding the effects of disturbance on birds stems from the fact that they are expending energy unnecessarily and the time they spend responding to disturbance is time that is not spent feeding (Riddington, et al., 1996). Disturbance therefore risks increasing energetic output while reducing energetic input, which can adversely affect the 'condition' and ultimately survival of the birds. In addition, displacement of birds from one feeding site to others can increase the pressure on the resources available within the remaining sites, as they have to sustain a greater number of birds (Gill, et al., 1998). Moreover, the more time a breeding bird spends disturbed from its nest, the more its eggs are likely to cool and the more vulnerable they, or any nestlings, are to predators.
- 5.2 The potential for disturbance may be less in winter than in summer, in that there are often a smaller number of recreational users. In addition, the consequences of disturbance at a population level may be reduced because birds are not breeding. However, winter activity can still cause important disturbance, especially as birds are particularly vulnerable at this time of year due to food shortages, such that disturbance which results in abandonment of suitable feeding areas through disturbance can have severe consequences. Several empirical studies have, through correlative analysis, demonstrated that out-of-season (October-March) recreational activity can result in quantifiable disturbance:
- Tuite, et al., (1983) found that during periods of high recreational activity, bird numbers at Llangorse Lake decreased by 30% as the morning progressed, matching the increase in recreational activity towards midday. During periods of low recreational activity, however, no change in numbers was observed as the morning progressed. In addition, all species were found to spend less time in their 'preferred zones' (the areas of the lake used most in the absence of recreational activity) as recreational intensity increased.
 - Underhill, et al., (1993) counted waterfowl and all disturbance events on 54 water bodies within the South West London Water Bodies Special Protection Area and clearly correlated disturbance with a decrease in bird numbers at weekends in smaller sites and with the movement of birds within larger sites from disturbed to less disturbed areas.
 - Evans & Warrington (1997) found that on Sundays total water bird numbers (including shoveler and gadwall) were 19% higher on Stocker's Lake LNR in Hertfordshire and attributed this to observed greater recreational activity on surrounding water bodies at weekends relative to weekdays. However, in this study, recreational activity was not quantified in detail, nor were individual recreational activities evaluated separately.

- Tuite, et al., (1984) used a large (379 site), long-term (10-year) dataset (September – March species counts) to correlate seasonal changes in wildfowl abundance with the presence of various recreational activities. They found that shoveler was one of the most sensitive species to disturbance. The greatest impact on winter wildfowl numbers was associated with sailing/windsurfing and rowing.
- 5.3 More recent research has established that human activity including recreational activity can be linked to disturbance of wintering waterfowl populations (Cruickshanks, et al., 2010; Liley, et al., 2011).
- 5.4 Chesil and The Fleet SAC and Chesil Beach and The Fleet SPA and Ramsar are considered to have current high recreational pressure upon the sites, although this is mainly focused on the breeding little tern colony. Although much of the site is inaccessible to the public, off lead dog walking is responsible for the highest proportion of disturbance events with regards to over-wintering wigeon, where dogs can access the shoreline (Liley, et al., 2015). Supplementary Conservation Advice (Natural England, 2020) goes further to say with regards to the breeding little tern colony *“disturbance at the colony in 2017 came from kayakers landing in close proximity to the breeding colony area, anglers, and off lead dogs. Aircraft also caused disturbance of incubating adults.”* Kayaking and angling are both niche activities that attract users from a wide area and activity does not necessarily increase in direct proportion to an increase in the local population. Dog walking may do so.
- 5.5 However, although the Neighbourhood Plan is allocating sites for development that were not allocated in the adopted West Dorset, Weymouth and Portland Local Plan (2015), the HRA for the Local Plan included an allowance for growth beyond allocated sites and therefore the effect of 15,000 net new dwellings in West Dorset, Weymouth and Portland has been assessed at the Local Plan level. As such, the conclusions of the Local Plan HRA will hold for the CBNP as well which considered this issue cumulatively from growth across Dorset. The Local Plan concluded that the Plan presented no significant adverse effects upon European sites either alone or in-combination with other plans and projects.
- 5.6 This is ensured by providing policies which protect European sites including Policy ENV 2 *“Internationally designated wildlife sites (including proposed sites and sites acquired for compensatory measures), will be safeguarded from development that could adversely affect them, unless there are reasons of overriding public interest why the development should proceed and there is no alternative acceptable solution.”* This is the over-riding policy consideration where development may cause an adverse effect upon the integrity of a European site. In addition to this Policy ENV 1 also states in relation to the landscape, seascape and sites of geological interest; *“Appropriate measures will be required to moderate the adverse effects of development on the landscape and seascape”*. The NP must comply with the Local Plan and any revisions thereof, and therefore these policies together provide protection from adverse effects to the integrity of the SAC.
- 5.7 In addition to this, Chesil Beach and The Fleet is managed for recreation by relevant European Marine Sites authorities including Natural England, Weymouth and Portland Borough Council and Ilchester Estates which have a management scheme (Natural England, 2001) and appoint a warden to carry this

out. This operates alongside Natural England advice under the Habitats Directive. The management scheme includes wardening to monitor levels of disturbance and promote responsible behaviour as well as maintaining Abbotsbury embayment and mid Fleet as a sanctuary area.

- 5.8 Supplementary conservation advice (Natural England, 2020) also states *“There is currently successful management in place aimed at reducing levels of anthropogenic disturbance. The RSPB and partners currently maintain a fence around the breeding colony for the duration of the breeding season. They also have interpretation on the fencing and live footage is streamed at the Chesil Visitor Centre, informing the public of the colony and discouraging them from approaching the site.”*
- 5.9 The management scheme and wardening has seen the colony make year on year increases in breeding pairs since the decline to zero in 2009 with a five year mean of 34 breeding pairs between 2013 and 2017 (Natural England, 2020) and a total of 50 breeding pairs recorded in 2020 (Dadds & Archer, 2020).
- 5.10 Nonetheless, Dorset Council in collaboration with Natural England have identified the need for a specific recreation management strategy to help address any impacts on the SAC/SPA from a net increase in residential development. According to Natural England, there is an unacceptable level of existing recreational pressure at Chesil Beach and the Fleet which is likely to be compromising the integrity of the SAC site features. The SACO identified significant concerns regarding recreational pressures on the features of the site, in particular Little Tern, which is in unfavourable condition with a target to restore to the former population as it was upon designation.
- 5.11 The interim mitigation strategy, currently an interim strategy⁷, which consists of two strands:
- Strategic Access Management and Monitoring - focusing on wardening, education and monitoring the strategy.
 - Infrastructure projects - Providing facilities to manage visitor access to Chesil and the Fleet. This includes the creation or improvement of an alternative access around the shoreline or rationalising multiple access points into one principal access point to an area of shoreline.
- 5.12 To support delivery of this strategy Dorset Council levies a charge for all net new residential development within 5km of the SAC/SPA. As of 2020 the charge was £499.73 per net new dwelling.
- 5.13 This issue post-dates the adopted Local Plan and its policies. **It is therefore recommended that Policies CBNP18 of the Neighbourhood Plan makes specific reference to the need for net new residential dwellings within the Neighbourhood Area to make a financial contribution to delivery of the Chesil & The Fleet Interim Recreation Mitigation Strategy, in line with Dorset Council guidance. With that requirement included, and given that the Neighbourhood Plan is only allocating between three and nine net new dwellings, it is considered that an appropriate framework would be in place to ensure no adverse effect on the integrity of European sites.**

⁷ <https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning/mitigation/chesil-and-the-fleet-mitigation#:~:text=In%20compliance%20Dorset%20Council%20have,education%20and%20monitoring%20the%20strategy.>

Air Quality

5.14 The test of likely significant effects concluded that although the CBNP is unlikely to cause significant effects with regards to air quality alone, there is a linking impact pathway. In other words, there is a main road within 200 m of a component part of the SAC or Ramsar site and therefore the potential to cause a likely significant effect in combination with other plans and projects. Therefore, the follow European sites will be discussed further below:

- Chesil and The Fleet SAC/ Chesil Beach and The Fleet Ramsar;
- Portland to Studland Cliffs SAC;
- Cerne and Sydling Downs SAC; and,
- Dorset Heaths SAC and Dorset Heathlands Ramsar

5.15 Chesil Beach and The Fleet SAC and Portland to Studland Cliffs SAC do both lie within 200m of the A354, but the stretches of road in question would only be used while accessing the Isle of Portland itself which is less likely to be a significant journey to work destination for residents of the Neighbourhood Area than Weymouth, Dorchester or other large towns further afield. Moreover, for all the European sites listed above, the number of dwellings to be delivered under the NP (6 to 9) is so small that it may not result in any net change in the resident population of the four parishes and any change that does result will be well within the normal daily variation in traffic flows on the local road network and therefore statistically imperceptible.

5.16 The West Dorset, Weymouth and Portland Adopted Local Plan (2015) intends to delivery at least 15,500 net new dwellings and 60 ha of employment land, which could increase the number of car journeys past the above European sites and given that all of the sites are above their critical nitrogen deposition loads, this has the potential to cause an impact on the integrity of the European sites.

5.17 However, the Adopted Local Plan has undertaken a Habitats Regulations Assessment of its own (West Dorset District Council & Weymouth and Portland Borough Council, 2015), which concluded “*the Local Plan was unlikely to result in significant effects upon protected sites*”. This was ensured by including several policies within the Plan including:

- Policy ENV 16 which states: “*Development proposals will only be permitted provided:... they do not generate unacceptable pollution, vibration or detrimental emissions unless it can be demonstrated that the effects on amenity and living conditions, health and the natural environment can be mitigated to the appropriate standard.*”; and,
- Policy ENV 2 which states: “*Internationally designated wildlife sites (including proposed sites and sites acquired for compensatory measures), will be safeguarded from development that could adversely affect them...*”.

5.18 Clearly if the Local Plan is delivering 15,000 dwellings and concluded European sites would not be negatively affected then a maximum of 6-9 dwellings (which may not be associated with any increase in population) won't change that

conclusion, particularly since the overall allowance will have been captured in the Local Plan considerations.

- 5.19 As the CBNP must comply with the overarching Adopted Local Plan and the quantum of housing planned for in the CBNP is in line with the allowance made within the adopted Local Plan, **it can be concluded that the CBNP will not contribute to a significant adverse effect on the integrity of any European site with regards to air quality either alone or in-combination with other plans and projects.**

Water Pollution

- 5.20 As the quantum of development to be provided by the CBNP is in conformity with the overarching West Dorset, Weymouth and Portland Adopted Local Plan (Dorset Council, 2015) (which has been subject to HRA that concluded no adverse effects on integrity), impact pathways relating to increase water demand provided by the additional business/housing, that could result in an increase in water abstraction and increased effluent has been addressed at a higher tier level within the West Dorset, Weymouth and Portland Adopted Local Plan.
- 5.21 Moreover, the CBNP will need to comply with the West Dorset, Weymouth and Portland Adopted Local Plan which states “*Development will not be permitted where the problems associated with the lack of necessary utilities service infrastructure, including energy suppliers, drainage, sewerage, sewerage treatment and water supply, cannot be overcome.*” The Local Plan also goes on to say “*both councils will work with utility service providers to assess the quality and capacity of energy supplies, water supplies, telecommunications, drainage, sewerage, and sewage treatment provision, and their ability to meet forecast demands. Where adequate capacity is not available within existing systems, assurances will be required that the necessary infrastructure will be provided.*”
- 5.22 The CBNP must comply with the overarching adopted Local Plan. However, on 16th March 2022 a letter was sent to Chief Planners by Natural England which identified European sites where a new requirement for nutrient neutrality had been identified. Natural England’s advice to planners is that the affected European sites are suffering from excessive nutrient enrichment (known as hypereutrophication) and this is resulting in negative effects on the interest features of the sites, such as through smothering macroalgal growth, a process called eutrophication. In Table 2 of the letter Chesil & The Fleet SAC and SPA are identified to be suffering from excessive nitrogen and phosphorus levels.
- 5.23 In Natural England’s view any further ‘in combination’ release of nutrients from development, through discharge of treated sewage effluent, will contribute to the continuing failure of the SPA/SAC to achieve its conservation objectives. This is an important consideration since a plan cannot legally be adopted, or a project consented, if it will have an adverse effect on the integrity of a European site ‘in combination’ with other plans and projects. While the amount of growth in the Neighbourhood Plan is very small (so small that it may not translate at all into an actual net change in the local population) it is nonetheless captured by the new requirement to undertake calculations to determine if the growth it is allocating is likely to be nutrient neutral.
- 5.24 Using the nutrient neutrality calculator tool provided by Natural England for Chesil & The Fleet SAC/SPA, the three to nine dwellings allocated in the

Neighbourhood Plan would result in a net surplus of 11.38 kg/yr phosphorus and 75.87 kg/yr nitrogen. Therefore, offsetting or mitigation for this net increase would be required. Note that due to the early stage of development proposals on these sites assumptions have been made in this HRA to derive the above figures for phosphorus and nitrogen surplus. As such, the calculations would need repeating for each planning application.

- 5.25 It is also necessary for the Neighbourhood Plan to contain a sufficient policy framework is in place to ensure planning applications for the allocated sites can demonstrate they can achieve nutrient neutrality through mitigation if necessary, in order to gain Neighbourhood Plan support. Therefore, the original HRA of the Neighbourhood Plan recommended that a new policy requirement should be added to the Neighbourhood Plan which states that *'Applications for net new residential development within the Neighbourhood Area will only be supported if they are able to demonstrate nutrient neutrality and, where necessary, deliver appropriate mitigation to ensure this requirement is met'*. This has now been included as Policy CBNP9 (Ensuring Nutrient Neutrality). With that requirement in place, the Neighbourhood Plan will contain a sufficient policy framework to protect the SAC/SPA from nutrient pollution.

6. Conclusions

6.1 The Chesil Bank Neighbourhood Plan (CBNP) has a total of 31 policies. Of these policies five had the potential to cause a likely significant effect and were discussed with regards to their impacts upon European sites. These sites were;

- CBNP5 – Land east of North Mead Farm (PO-03) – the policy does not cite a number of dwellings for the site in Portesham but the supporting text indicates 3-6 dwellings;
- CBNP6 – Land adjoining Stone Cottage (FL-05) – allocates a single dwelling in Fleet;
- CBNP7 – Land at Higher Farmhouse (LH-01) – allocates a single dwelling in Langton Herring;
- CBNP8 – Land adjoining 4 Court Close (LH-02) – allocates a single dwelling in Langton Herring; and,
- CBNP10 – Sustainable business growth – is a development management policy for employment development. However, it also relays that new tourist and care-related accommodation will be supported.

6.2 The test of likely significant effects focused on the above policies with regards to the vulnerabilities of the European sites within Table 1. The impact pathways relating to the European sites vulnerabilities are listed below:

- Recreational Pressure;
- Functionally Linked Land;
- Air Quality; and,
- Water Pollution.

6.3 The policies were found to have a potential likely significant effect upon the European sites within Table 1 with regards to the following impact pathways; recreational pressure, air quality and water resources and water quality in combination with other plans and project. These pathways and the policies were discussed within the Appropriate Assessment.

6.4 The overarching Local Plan – West Dorset, Weymouth and Portland (2015) was discussed to provide protective policies (e.g. ENV2) for European sites, and the HRA of this Plan was able to conclude that the Plan would not cause likely significant effects upon any European site either alone or in combination with other plans and projects. As the CBNP is not allocating net new dwellings above the level of the Adopted Local Plan and is required to comply with policies within the Local Plan it could be concluded that the CBNP would not adversely impact European sites either alone or in-combination with other plans and projects.

6.5 However, policy wording recommendation has been made to cover recreational pressure for Chesil & The Fleet SAC/SPA:

- **Policy CBNP18 should make specific reference to the need for net new residential dwellings within the Neighbourhood Area to make a**

**financial contribution to delivery of the Chesil & The Fleet Interim
Recreation Mitigation Strategy, in line with Dorset Council guidance.**

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Appendix A European Sites Background

A.1 Chesil Beach and The Fleet SPA/Ramsar and Chesil and The Fleet SAC

Conservation Objectives

- 7.1 With regard to the SPA (Natural England, 2019) and the individual species and/or assemblage of species for which the site has been classified (the 'Qualifying Features' listed below), and subject to natural change;
- 7.2 Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;
- The extent and distribution of the habitats of the qualifying features
 - The structure and function of the habitats of the qualifying features
 - The supporting processes on which the habitats of the qualifying features rely
 - The population of each of the qualifying features, and,
 - The distribution of the qualifying features within the site.
- 7.3 With regard to the SAC (Natural England, 2018) and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change:
- 7.4 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

Qualifying Features

- 7.5 With regards to the SPA:
- Eurasian wigeon *Anas penelope* (non-breeding)
 - Little tern *Sternula albifrons* (breeding)
- 7.6 With regards to the SAC
- Coastal lagoons
 - Annual vegetation of drift lines

- Perennial vegetation of stony banks; Coastal shingle vegetation outside the reach of waves
- Atlantic salt meadows *Glauco-Puccinellietalia maritimae*
- Mediterranean and thermo-Atlantic halophilous scrubs *Sarcocornetea fruticosi*; Mediterranean saltmarsh scrub

7.7 With regards to the Ramsar (JNCC, 2008):

- Ramsar Criterion 1:
 - The fleet is an outstanding example of rare lagoon habitat and is the largest of its kind in the UK. In Europe lagoons are classified as priority habitat by the EC Habitats and Species Directive. The site also supports rare salt marsh habitats.
- Ramsar Criterion 2:
 - The fleet supports 15 specialist lagoon species – more than any other UK site – and five nationally scarce wetland plants as well as ten nationally scarce wetland animals. Chesil bank is one of the most important UK sites for shingle habitats and species.
- Ramsar Criterion 3:
 - The site is the largest barrier-built saline lagoon in the UK, and has the greatest diversity of habitats and of biota.
- Ramsar Criterion 4:
 - The site is important for a number of species at a critical stage in their life cycle including post larval and juvenile bass *Dicentrarchus labrax*.
- Ramsar Criterion 8:
 - The site is important as a nursery for bass
- Ramsar Criterion 6:

Species/Populations occurring at levels of international importance

 - Dark-bellied brent goose *Branta bernicula bernicula* (non-breeding)
 - Mute-swan *Cygnus olor* (non-breeding)

Environmental Vulnerabilities (Natural England, 2018)

- Water pollution
- Changes in species distribution
- Public access/disturbance
- Fisheries: commercial marine and estuarine
- Invasive species
- Natural changes to site conditions

- Air quality
- Inappropriate coastal management

A.2 Crookhill Brick Pit SAC

Conservation Objectives

7.8 With regard to the SAC (Natural England, 2018) and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change:

7.9 Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring:

- The extent and distribution of the habitats of qualifying species
- The structure and function of the habitats of qualifying species
- The supporting processes on which the habitats of qualifying species rely
- The populations of qualifying species, and,
- The distribution of qualifying species within the site.

Qualifying Features

7.10 With regards to the SAC:

- Create crested newt *Triturus cristatus*

Environmental Vulnerabilities (Natural England, 2015; Natural England, 2019)

- Change in land management
- Scrub encroachment and marginal planting management
- Invasive species
- Water quality

A.3 Isle of Portland to Studland Cliffs SAC

Conservation Objectives

7.11 With regard to the SAC (Natural England, 2018) and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change:

7.12 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

7.13 With regards to the SAC:

- Annual vegetation of drift lines
- Vegetated sea cliffs of the Atlantic and Baltic coasts
- Semi-natural dry grasslands and scrubland facies: on calcareous substrates (*Festuco-Brometalia*); Dry grasslands and scrublands on chalk or limestone
- Early gentian *Gentianella anglica*

Environmental Vulnerabilities (Natural England, 2014; Natural England, 2019)

- Under-grazing
- Inappropriate scrub
- Invasive species
- Agricultural management practices
- Public access/disturbance
- Water pollution
- Habitat fragmentation
- Inappropriate coastal management
- Natural changes to site conditions
- Managed rotational burning
- Changes to site management
- Air quality

A.4 West Dorset Alder Woods SAC

Conservation Objectives

7.14 With regard to the SAC (Natural England, 2018) and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change:

7.15 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

7.16 With regards to the SAC:

- Molinia meadows on calcareous, peaty or clayey-silt-laden soils (Molinion caeruleae);
- Purple moor-grass meadows
- Old acidophilous oak woods with *Quercus robur* on sandy plains; Dry oak-dominated woodland
- Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior* (Alno-Padion, Alnion incanae, Salicion albae); Alder woodland on floodplains
- Marsh fritillary butterfly *Euphydryas* (*Eurodryas*, *Hypodryas*) *aurinia*
- Great crested newt *Triturus cristatus*

Environmental Vulnerabilities (Natural England, 2014; Natural England, 2019)

- Deer over-grazing
- Water pollution
- Forestry and woodland management
- Under-grazing

- Invasive species
- Disease
- Water abstraction
- Habitat fragmentation
- Air quality
- Changes to hydrology
- Changes to illumination

A.5 Cerne & Sydling Downs SAC

Conservation Objectives

7.17 With regard to the SAC (Natural England, 2018) and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change:

7.18 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

7.19 With regards to the SAC:

- Semi-natural dry grasslands and scrubland facies: on calcareous substrates (*Festuco-Brometalia*); Dry grasslands and scrublands on chalk or limestone
- Marsh fritillary butterfly *Euphydryas (Eurodryas, Hypodryas) aurinia*

Environmental Vulnerabilities (Natural England, 2015; Natural England, 2019)

- Habitat fragmentation
- Over-grazing

- Under-grazing
- Inappropriate weed control
- Fertiliser use
- Direct impact from third party
- Inappropriate scrub control
- Air quality

A.6 Dorset Heathlands SPA/Ramsar and Dorset Heaths SAC

Conservation Objectives

7.20 With regard to the SPA (Natural England, 2019) and the individual species and/or assemblage of species for which the site has been classified (the 'Qualifying Features' listed below), and subject to natural change.

7.21 Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring:

- The extent and distribution of the habitats of the qualifying features
- The structure and function of the habitats of the qualifying features
- The supporting processes on which the habitats of the qualifying features rely
- The population of each of the qualifying features, and,
- The distribution of the qualifying features within the site.

7.22 With regard to the SAC (Natural England, 2018) and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change.

7.23 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

7.24 With regards to the SPA:

- Hen harrier *Circus cyaneus* (non-breeding)
- Merlin *Falco columbarius* (non-breeding)
- Nightjar *Caprimulgus europaeus* (breeding)
- Woodlark *Lullula arborea* (breeding)
- Dartford warbler *Sylvia undata* (breeding)

7.25 With regards to the SAC:

- Northern Atlantic wet heaths with *Erica tetralix*; Wet heathland with cross-leaved heath
- European dry heaths
- Molinia meadows on calcareous, peaty or clayey-silt-laden soils (*Molinion caeruleae*); Purple moor-grass meadows
- Depressions on peat substrates of the *Rhynchosporion*; Depressions on peat substrates
- Calcareous fens with *Cladium mariscus* and species of the *Caricion davallianae*; Calcium-rich fen dominated by great fen sedge (saw sedge)
- Alkaline fens; Calcium-rich springwater-fed fens
- Old acidophilous oak woods with *Quercus robur* on sandy plains; Dry oak-dominated woodland
- Southern damselfly *Coenagrion mercuriale*
- Great crested newt *Triturus cristatus*

7.26 With regards to the Ramsar (JNCC, 2008):

- Ramsar Criterion 1:
 - Contains particularly good examples of (i) northern Atlantic wet heaths with cross-leaved heath *Erica tetralix* and (ii) acid mire with *Rhynchosporion*.
 - Contains the largest example in Britain of southern Atlantic wet heaths with Dorset heath *Erica ciliaris* and cross-leaved heath *Erica tetralix*.
- Ramsar Criterion 2:
 - Supports 1 nationally rare and 13 nationally scarce wetland plant species, and at least 28 nationally rare wetland invertebrate species.
- Ramsar Criterion 3:
 - Has a high species richness and high ecological diversity of wetland habitat types and transitions and lies in one of the most biologically-

rich wetland areas of lowland Britain, being continuous with three other Ramsar sites: Pool Harbour, Avon Valley and The New Forest.

Environmental Vulnerabilities (Natural England, 2014; Natural England, 2019; Natural England, 2019)

- Inappropriate scrub control
- Public access/disturbance
- Under-grazing
- Forestry and woodland management
- Drainage
- Water pollution
- Invasive species
- Habitat fragmentation
- Conflicting conservation objectives
- Wildfire/arson
- Air quality
- Deer
- Inappropriate habitat management
- Inappropriate illumination
- Pest control
- Changes in hydrology

A.7 Sidmouth to West Bay SAC

Conservation Objectives

7.27 With regard to the SAC (Natural England, 2018) and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change.

7.28 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.

Qualifying Features

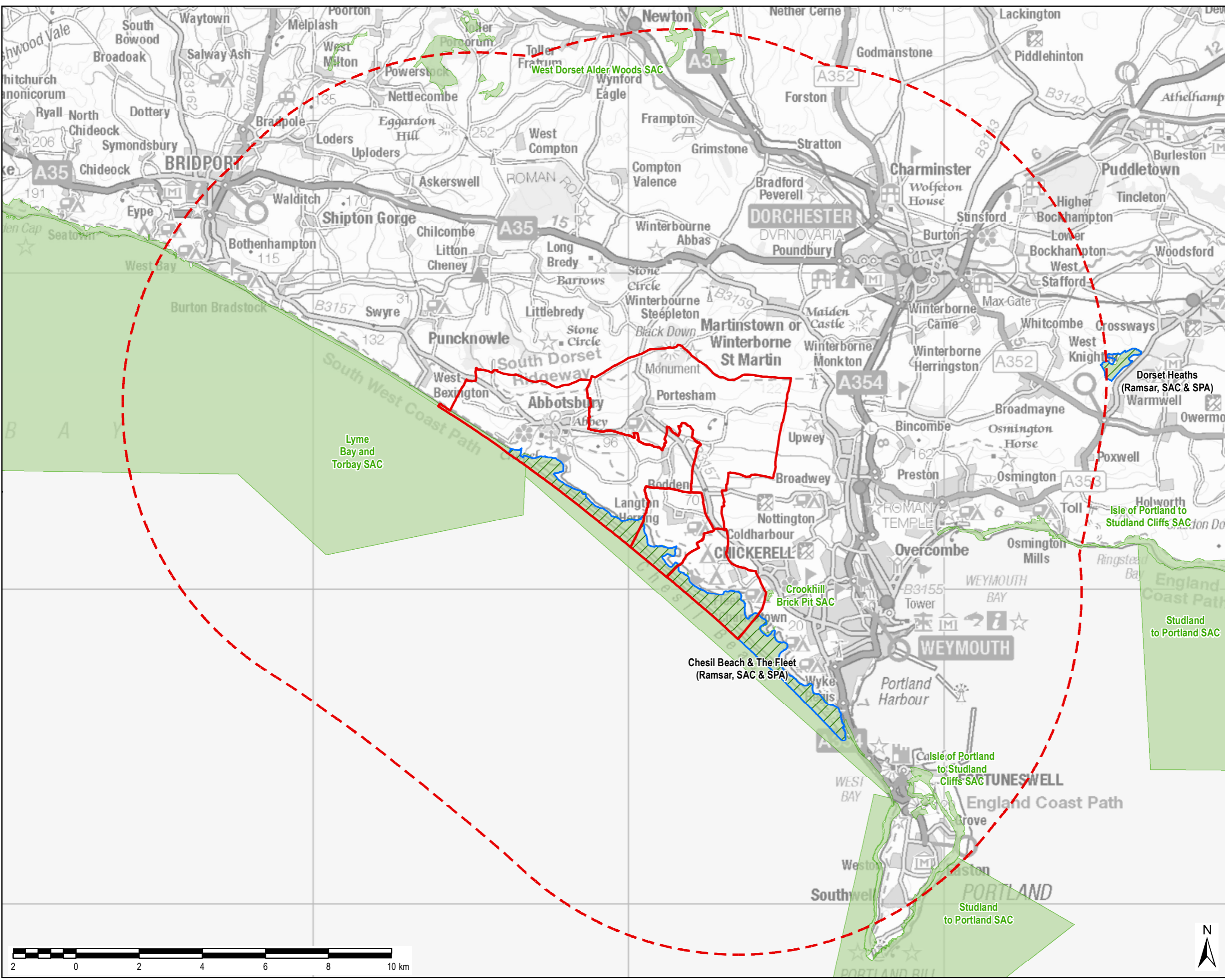
7.29 With regards to the SAC:

- Annual vegetation of drift lines
- Vegetated sea cliffs of the Atlantic and Baltic coasts
- *Tilio-Acerion* forests of slopes, screes and ravines; Mixed woodland on base-rich soils associated with rocky slopes

Environmental Vulnerabilities (Natural England, 2015; Natural England, 2019)

- Invasive species
- Disease
- Direct impact from third party
- Planning permission: general
- Water pollution
- Vehicles
- Habitat fragmentation
- Inappropriate coastal management
- Air quality
- Fly tipping

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LEGEND	
	Chesil Bank Parish Boundary
	Parish Buffer - 10km
	Ramsar
	Special Area of Conservation (SAC)
	Special Protection Area (SPA)

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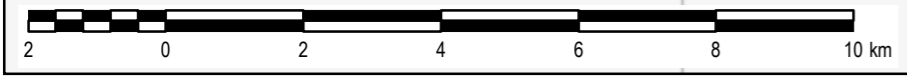
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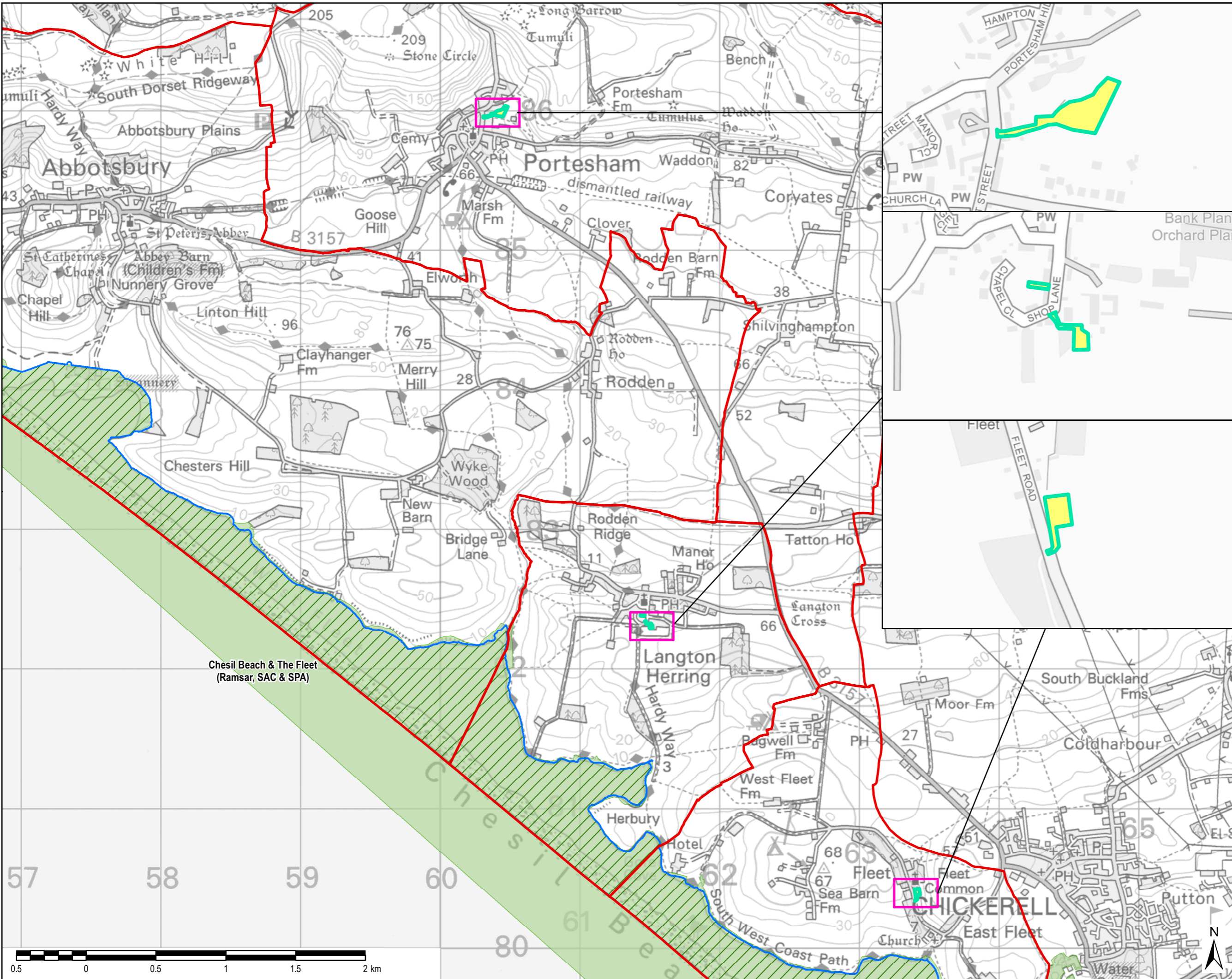
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- LEGEND**
- Site Allocation
 - Chesil Bank Parish Boundary
 - Ramsar
 - Special Area of Conservation (SAC)
 - Special Protection Area (SPA)

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Purpose of Issue **DRAFT**

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Project Title **CHESIL BANK NEIGHBOURHOOD PLAN HRA**

Drawing Title **CHESIL BANK PARISH ALLOCATIONS**

Drawn NS	Checked MLS	Approved MK	Date 16/03/2022
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Drawing Number **FIGURE 2**

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Appendix B Policy Screening

Table 2. Chesil Bank Neighbourhood Plan Policy Screening

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
CBNP1 – Dwelling types	This policy relates to the type and size of dwellings that would be supported	No likely significant effects. The policy is a development management policy and does not have any linking impact pathways.
CBNP2 –Dwelling – extensions	This policy relates to the size of extensions supported for rural extensions	No likely significant effects. The policy is a development management policy and does not have any linking impact pathways.
CBNP3 – Holiday/second home restrictions	This policy relates to the restrictions on second home and holiday home properties within the Parish	No likely significant effects. The policy is a development management policy and does not have any linking impact pathway.
CBNP4 – Affordable housing – local connection	This policy relates to the provision of affordable housing at a priority for local people.	No likely significant effects. The policy is a development management policy and does not have any linking impact pathway.
CBNP5 – Land east of North Mead Farm (PO-03)	Site allocation for mix of affordable and open market homes. Affordable home will 50% of total dwellings. Total number of homes will depend on detailed design but supporting text suggests 3-6 dwellings.	Potential likely significant effects. Although the allocation does not supply a quantum, this policy does allocate a site to provide a net increase of 3-6 dwellings within Portesham and will need to be discussed further within the body of the report.
CBNP6 – Land adjoining Stone Cottage (FL-05)	Site allocation for one affordable dwelling to be accessed from the existing access to Stone Cottage	Potential likely significant effects. The policy allocates a single dwelling at a site in Fleet. This is a net increase in dwellings and will need to be discussed further within the body of the report.
CBNP7 -Land at Higher Farmhouse (LH-01)	Site allocation for one dwelling to be accessed from the existing access to Higher Farmhouse	Potential likely significant effects. The policy allocates a single dwelling at a site in Langton Herring. This is a net increase in dwellings and will need to be discussed further within the body of the report.
CBNP8 – Land adjoining 4 Court Close (LH-02)	Site allocation for one dwelling to be accessed from Shop Lane.	Potential likely significant effects. The policy allocates a single dwelling at a site in Langton Herring. This is a net increase in dwellings and will need to be

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
		discussed further within the body of the report.
CBNP9 – Ensuring nutrient neutrality	This policy sets out a requirement for all net new housing in the Neighbourhood Area to demonstrate nutrient neutrality regarding Chesil & The Fleet SAC	No likely significant effects. The policy is a development management policy and does not have any linking impact pathway.
CBNP10 – Sustainable business growth	This policy relays the criteria by which employment development will be supported. Policy also states that new build tourist and care-related accommodation will also be supported within Portesham.	Potential likely significant effects. The policy is a development management policy for employment development. However, the policy also relays that new tourist and care-related accommodation will be supported. As the policy supports a net increase in new accommodation this will need to be discussed within the body of the report.
CBNP11 – Homeworking	This policy relays the criteria by which outbuildings for homeworking will be supported.	No likely significant effects. The policy is a development management policy and does not have any linking impact pathway.
CBNP12 – Community and recreational facilities	This policy relays the criteria by which community and recreational facilities development will be supported.	No likely significant effects. The policy is a development management policy and does not have any linking impact pathways.
CBNP13 – Recreational access to the countryside	This policy relates to the criteria by which the improvement and expansion of the existing public rights of way network, permissive paths and open access land will be supported.	No likely significant effects. The policy is a development management policy and does not have any linking impact pathways and could have a positive effect on European sites by spreading recreational use around the countryside.
CBNP14 – Local green spaces	This policy states that no development will be permitted within or immediately adjacent to any site designated as a local green space, should it undermine their designation.	No likely significant effects. The policy is a development management policy and does not have any linking impact pathways.
CBNP15 – Local Landscape features	This policy relays the criteria by which development will be resisted should local landscape features and characteristics be removed or degraded within planning applications	No likely significant effects. The policy is a development management policy and does not have any linking impact pathways.
CBNP16 – Local views	The policy relates to the minimising of adverse impact on views from public rights of way over open countryside.	No likely significant effects. The policy is a development management policy and does not have any linking impact pathways.

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
CBNP17 – Dark skies and lighting schemes	This policy relates to the minimising of light pollution.	No likely significant effects. The policy is a development management policy and does not have any linking impact pathways.
CBNP18 – Local wildlife and habitats	This policy states that development must protect and, where practicable, enhance biodiversity to secure an overall biodiversity net gain, taking into account the existing wildlife interest and habitats in the local area.	No likely significant effects. The policy is a development management policy and does not have any linking impact pathways.
CBNP19 – Local heritage assets	Requires development to make a positive contribution to the conservation of heritage assets in the Neighbourhood Area. A number of features are listed for consideration and, where possible, preservation as non-designated heritage assets.	No likely significant effects. The policy is a development management policy and does not have any linking impact pathways.
CBNP20 Local flood risk in Portesham	Requires a flood risk assessment for all development proposals that would result in increased surface water runoff in Portesham village.	No likely significant effects. The policy is a development management policy and does not have any linking impact pathways.
CBNP21 Portesham's development boundary	Amends the development boundary for Portesham.	No likely significant effects. The policy is a development management policy and does not have any linking impact pathways.
CBNP22 – Chesil Bank design guidance	This policy relates to development providing sustainable high-quality design.	No likely significant effects. The policy is a development management policy and does not have any linking impact pathways.
CBNP23 – Settlement pattern	This policy relates to maintaining continuity of the built settlement form and creating connectivity.	No likely significant effects. The policy is a development management policy and does not have any linking impact pathways.
CBNP24 – Streets and spaces	This policy relates to the way which developments should be designed with regards to how their streetscape and public spaces look	No likely significant effects. The policy is a development management policy and does not have any linking impact pathways.
CBNP25 – Views and landmarks	This policy relates to the way which developments should be designed with regards to local views and landmarks	No likely significant effects. The policy is a development management policy and does not have any linking impact pathways.
CBNP26 – Building styles	This policy relates to developments providing a rich mix of architectural	No likely significant effects.

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
	forms and features within the developments.	The policy is a development management policy and does not have any linking impact pathways.
CBNP27 – Materials	This policy relates to developments should be built using a simple and local material palette.	No likely significant effects. The policy is a development management policy and does not have any linking impact pathways.
CBNP28 – Doors and windows	This policy relates to developments using doors, windows and material that respect the local character.	No likely significant effects. The policy is a development management policy and does not have any linking impact pathways.
CBNP29 – Roofs and chimneys	This policy relates to developments creating a varied and interesting roofscape through subtle change in the roofline and use of traditional and local materials.	No likely significant effects. The policy is a development management policy and does not have any linking impact pathways.
CBNP30 – Parking	This policy relates to the design and provision of parking within the developments.	No likely significant effects. The policy is a development management policy and does not have any linking impact pathways.
CBNP31 – Sustainability features	This policy relates to developments seeking to minimise their carbon footprint and to provide sustainable technology.	No likely significant effects. The policy is a development management policy and does not have any linking impact pathways.

