



[www.landuse.co.uk](http://www.landuse.co.uk)

# **Mid Devon Local Plan Review Publication Draft**

## **Habitats Regulations Assessment Report**

Prepared by LUC  
March 2015

**Project Title:** Habitats Regulations Assessment of Mid Devon’s Local Plan Review

**Client:** Mid Devon District Council

Version	Date	Version Details	Prepared by	Checked by	Approved by
1	16/04/14	Interim HRA Report for the Mid Devon Local Plan Review Options Consultation	Kate Nicholls Ifan Gwilym Rosie MacLellan	Kate Nicholls	
2	09/05/14	Draft HRA Report for the Mid Devon Local Plan Review Options Consultation	Kate Nicholls Ifan Gwilym Rosie MacLellan	Jeremy Owen	Jeremy Owen
3	14/08/14	Draft updated HRA Report for the Mid Devon Local Plan Review: Publication Draft	Kate Nicholls Ifan Gwilym Rosie MacLellan Kieran Moroney	Kate Nicholls	
4	28/08/14	Final updated HRA Report for the Mid Devon Local Plan Review: Publication Draft	Kate Nicholls Ifan Gwilym Rosie MacLellan Kieran Moroney	Kate Nicholls	Jeremy Owen
5	10/10/14	Final updated HRA Report for the Mid Devon Local Plan Review: Publication Draft taking into account Natural England’s comments	Kate Nicholls Ifan Gwilym Rosie MacLellan Kieran Moroney	Kate Nicholls	Jeremy Owen
6	09/03/15	Final updated HRA Report for the Mid Devon Local Plan Review: Publication Draft incorporating updated in-combination effects assessment	Kate Nicholls Ifan Gwilym Rosie MacLellan Kieran Moroney	Kate Nicholls	Jeremy Owen



[www.landuse.co.uk](http://www.landuse.co.uk)

# Mid Devon Local Plan Review Publication Draft

## Habitats Regulations Assessment Report

Prepared by LUC  
March 2015

Planning & EIA  
Design  
Landscape Planning  
Landscape Management  
Ecology  
Mapping & Visualisation

LUC BRISTOL  
14 Great George Street  
Bristol BS1 5RH  
Tel:0117 929 1997  
Fax:0117 929 1998  
[bristol@landuse.co.uk](mailto:bristol@landuse.co.uk)

Offices also in:  
London  
Glasgow  
Edinburgh



FS 566056  
EMS 566057

Land Use Consultants Ltd  
Registered in England  
Registered number: 2549296  
Registered Office:  
43 Chalton Street  
London NW1 1JD

LUC uses 100% recycled paper

# Contents

<b>1</b>	<b>Introduction</b>	<b>1</b>
	The requirement to undertake Habitats Regulations Assessment of Development Plans	1
	Stages of the Habitats Regulations Assessment	2
	Structure of the HRA Report	3
<b>2</b>	<b>The Local Plan Review</b>	<b>5</b>
	Potential impacts of the Local Plan Review on European Sites	6
<b>3</b>	<b>Screening Methodology</b>	<b>9</b>
	Identification of European sites which may be affected by the Local Plan Review and the factors contributing to and defining the integrity of these sites	9
	Assessment of 'likely significant effects' of the Local Plan Review	12
	Screening assumptions and information used in reaching conclusions about likely significant effects	12
	Interpretation of 'likely significant effect'	15
	Mitigation provided by the policies	15
	Identification of other plans and projects which may have 'in-combination' effects	15
<b>4</b>	<b>Screening Findings</b>	<b>17</b>
	Screening of the Local Plan Review: Publication Draft	17
	Potential Mitigation	19
	In-combination Effects	20
<b>5</b>	<b>Appropriate Assessment Methodology and Findings</b>	<b>21</b>
	Appropriate Assessment Methodology	21
	Appropriate Assessment Findings	23
	Recommendations	25
<b>6</b>	<b>Conclusions</b>	<b>26</b>
<b>Appendix 1</b>		<b>27</b>
	Attributes of European Sites within Mid Devon District (+10km)	27
<b>Appendix 2</b>		<b>43</b>
	Plans, Policies and Programmes with the Potential for In-Combination Effects	43
<b>Appendix 3</b>		<b>52</b>
	HRA Screening of the Local Plan Review Publication Draft (January 2015)	52
<b>Appendix 4</b>		<b>75</b>
	Appropriate Assessment Matrix for the Local Plan Review Options	75
<b>Tables</b>		
	Table 1.1 Stages in HRA	2
	Table 2.1 Potential Impacts and Activities Adversely Affecting European Sites	7
	Table 3.1 European Sites within 10km of Mid Devon District	10
<b>Figures</b>		
	Figure 3.1 European sites within 10km of Mid Devon District	11

# 1 Introduction

- 1.1 Mid Devon District Council is carrying out a review of its adopted Local Plan in order to bring it up to date and to reflect the National Planning Policy Framework (NPPF). The existing Local Plan comprises three separate documents:
  - The Core Strategy (2007).
  - The Allocations and Infrastructure DPD (2010).
  - The Local Plan Part 3: Development Management Policies (2013).
- 1.2 The new Local Plan, known as the Local Plan Review, will include detailed policies to support development decisions (development management policies) as well as allocating specific sites for housing, employment and other development.
- 1.3 LUC was appointed by Mid Devon District Council in March 2014 to undertake Habitats Regulations Assessment (HRA) of the emerging Local Plan Review on its behalf. This HRA report relates to the Local Plan Review: Publication Draft (January 2015) and it should be read in conjunction with that document.
- 1.4 An earlier draft version of this HRA report was produced in relation to the Options Consultation version of the Local Plan Review (January 2014) and was sent to Natural England for comment. The Publication Draft version of the Local Plan Review has now been produced by the Council and the draft HRA report has been updated to present the findings of the HRA for this latest version. An earlier version was again sent to Natural England for comment.
- 1.5 The conclusions of the HRA report may need to be revised again if further changes are made to the Local Plan Review prior to adoption.

## The requirement to undertake Habitats Regulations Assessment of Development Plans

- 1.6 The requirement to undertake HRA of development plans was confirmed by the amendments to the Habitats Regulations published for England and Wales in July 2007 and updated in 2010<sup>1</sup> and again in 2012<sup>2</sup>. Therefore when preparing the Local Plan Review, Mid Devon District Council is required by law to carry out a Habitats Regulations Assessment. The requirement for authorities to comply with the Habitats Regulations when preparing a Local Plan is explained in the National Planning Practice Guidance (NPPG).
- 1.7 The HRA refers to the assessment of the potential effects of a development plan on one or more European Sites, including Special Protection Areas (SPAs) and Special Areas of Conservation (SACs):
  - SPAs are classified under the European Council Directive 'on the conservation of wild birds' (79/409/EEC; 'Birds Directive') for the protection of wild birds and their habitats (including particularly rare and vulnerable species listed in Annex 1 of the Birds Directive, and migratory species).
  - SACs are designated under the Habitats Directive and target particular habitats (Annex 1) and/or species (Annex II) identified as being of European importance.

---

<sup>1</sup> The Conservation (Natural Habitats, &c.) (Amendment) Regulations 2007. HMSO Statutory Instrument 2007 No. 1843. From 1 April 2010, these were consolidated and replaced by the Conservation of Habitats and Species Regulations 2010 (SI No. 2010/490). Note that no substantive changes to existing policies or procedures have been made in the new version.

<sup>2</sup> The Conservation of Habitats and Species (Amendment) Regulations 2012. Statutory Instrument 2012 No. 1927.

- 1.8 Potential SPAs (pSPAs)<sup>3</sup>, candidate SACs (cSACs)<sup>4</sup>, Sites of Community Importance (SCIs)<sup>5</sup> and Ramsar sites should also be included in the assessment.
- Ramsar sites support internationally important wetland habitats and are listed under the Convention on Wetlands of International Importance especially as Waterfowl Habitat (Ramsar Convention, 1971).
- 1.9 For ease of reference during HRA, these designations are collectively referred to as European sites despite Ramsar designations being at the international level.
- 1.10 The overall purpose of the HRA is to conclude whether or not a proposal or policy, or whole development plan, would adversely affect the integrity of the site in question either alone or in combination with other plans. This is judged in terms of the implications of the plan for a site's 'qualifying features' (i.e. those Annex I habitats, Annex II species, and Annex I bird populations for which it has been designated). Significantly, HRA is based on the precautionary principle meaning that where uncertainty or doubt remains, an adverse impact should be assumed.

## Stages of the Habitats Regulations Assessment

- 1.11 **Table 1.1** below summarises the stages involved in carrying out a full HRA, based on various guidance documents<sup>6,7,8</sup>.

**Table 1.1 Stages in HRA**

Stage	Task	Outcome
Stage 1: Screening (the 'Significance Test')	Description of the plan. Identification of potential effects on European Sites. Assessing the effects on European Sites (taking into account potential mitigation provided by other policies in the plan).	Where effects are unlikely, prepare a 'finding of no significant effect report'. Where effects judged likely, or lack of information to prove otherwise, proceed to Stage 2.
Stage 2: Appropriate Assessment (the 'Integrity Test')	Gather information (plan and European Sites). Impact prediction. Evaluation of impacts in view of conservation objectives. Where impacts considered to affect qualifying features, identify alternative options. Assess alternative options. If no alternatives exist, define and evaluate mitigation measures where necessary.	Appropriate Assessment report describing the plan, European site baseline conditions, the adverse effects of the plan on the European site, how these effects will be avoided through, firstly, avoidance, and secondly, mitigation including the mechanisms and timescale for these mitigation measures. If effects remain after all alternatives and mitigation measures have been considered proceed to Stage 3.
Stage 3: Assessment where no alternatives exist and adverse impacts remain taking into	Identify and demonstrate 'imperative reasons of overriding public interest'	This stage should be avoided if at all possible. The test of IROPI and the requirements

<sup>3</sup> Potential SPAs are sites that have been approved by Government and are currently in the process of being classified as SPAs.

<sup>4</sup> Candidate SACs are sites that have been submitted to the European Commission, but not yet formally adopted.

<sup>5</sup> SCIs are sites that have been adopted by the European Commission but not yet formally designated as SACs by the Government.

<sup>6</sup> *Assessment of plans and projects significantly affecting European Sites. Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC.* European Commission Environment DG, November 2001.

<sup>7</sup> *Planning for the Protection of European Sites. Guidance for Regional Spatial Strategies and Local Development Documents.* Department for Communities and Local Government (DCLG), August 2006.

<sup>8</sup> *The Appropriate Assessment of Spatial Plans in England. A guide to why, when and how to do it.* RSPB. August 2007.

Stage	Task	Outcome
account mitigation	(IROPI). Demonstrate no alternatives exist. Identify potential compensatory measures.	for compensation are extremely onerous.

- 1.12 In assessing the effects of the Mid Devon Local Plan Review in accordance with Regulation 102 of the Conservation of Habitats and Species Regulations 2010, there are potentially two tests to be applied by the competent authority: a 'Significance Test', followed if necessary by an Appropriate Assessment which will inform the 'Integrity Test'. The relevant sequence of questions is as follows:
- Step 1: Under Reg. 102(1)(b), consider whether the plan is directly connected with or necessary to the management of the sites. If not –
  - Step 2: Under Reg. 102(1)(a) consider whether the plan is likely to have a significant effect on the site, either alone or in combination with other plans or projects (the 'Significance Test'). *[These two steps are undertaken as part of Stage 1: Screening shown in Table 1.1 above.]* If Yes –
  - Step 3: Under Reg. 102(1), make an Appropriate Assessment of the implications for the site in view of its current conservation objectives (the 'Integrity Test'). In so doing, it is mandatory under Reg. 102(2) to consult Natural England, and optional under Reg. 102(3) to take the opinion of the general public. *[This step is undertaken during Stage 2: Appropriate Assessment shown in Table 1.1 above.]*
  - Step 4: In accordance with Reg.102(4), but subject to Reg.103, give effect to the land use plan only after having ascertained that the plan will not adversely affect the integrity of the European site.
- 1.13 It is normally anticipated that an emphasis on Stages 1 and 2 of this process will, through a series of iterations, help ensure that potential adverse effects are identified and eliminated through the inclusion of mitigation measures designed to avoid, reduce or abate effects. The need to consider alternatives could imply more onerous changes to a plan document. It is generally understood that so called 'imperative reasons of overriding public interest' (IROPI) are likely to be justified only very occasionally and would involve engagement with both the Government and European Commission.
- 1.14 The HRA should be undertaken by the 'competent authority' - in this case Mid Devon District Council, and LUC has been commissioned to do this on its behalf. The HRA also requires close working with Natural England as the statutory nature conservation body<sup>9</sup> in order to obtain the necessary information and agree the process, outcomes and any mitigation proposals. The Environment Agency, while not a statutory consultee for the HRA, is also in a strong position to provide advice and information throughout the process as it is required to undertake HRA for its existing licences and future licensing of activities.

## Structure of the HRA Report

- 1.15 This chapter has introduced the requirement to undertake HRA of the Local Plan Review. The remainder of the report is structured as follows:
- **Chapter 2: The Local Plan Review** summarises the content of the Publication Draft document (January 2015), which is the subject of this report.
  - **Chapter 3: Screening Methodology** sets out the approach used and the specific tasks undertaken during the screening stage of the HRA.
  - **Chapter 4: Screening Findings** describes the findings of the screening stage of the HRA.

<sup>9</sup> Regulation 5 of *The Conservation of Habitats and Species Regulations 2010*. HMSO Statutory Instrument 2010 No. 490.

- **Chapter 5: Appropriate Assessment Methodology and Findings** describes the Appropriate Assessment stage of the HRA.
- **Chapter 6: Conclusions** summarises the HRA conclusions for the Publication Draft version of the Local Plan and describes the next steps to be undertaken.

## 2 The Local Plan Review

### 2.1 The Local Plan Review: Publication Draft (January 2015) sets out the following long-term vision for Mid Devon:

*Mid Devon will be a prosperous and sustainable rural district, where individuals, families and communities can flourish as a result of access to good quality local employment, housing and services and a clean, green, safe environment. Local communities and private, public and voluntary organisations will work in partnership to meet social and economic needs in ways that enhance the environment and reduce the area's carbon footprint. High quality development in the right places with appropriate infrastructure will bring regeneration, social and economic benefits and enhance towns, villages and countryside while promoting sustainable use of energy and other resources and tackling the causes and effects of climate change. The Council will use planning and related powers to:*

#### **Promote community well-being**

- *Diverse, inclusive communities with a vibrant mix of accessible uses and local services*
- *Sufficient 'fit for purpose', decent homes which people can afford*
- *Safe, healthy and crime free neighbourhoods*
- *Active, involved, well-educated citizens*
- *A good range of opportunities to travel by active and sustainable modes*
- *Strong town and village communities*
- *Green Infrastructure for personal leisure amenity space*

#### **Support sustainable economic success**

- *A good range of jobs in urban and rural areas*
- *Growth that respects Mid Devon's relationship with Exeter and Taunton*
- *Profitable and expanding local businesses, attracting inward investment*
- *Attractive, lively and successful town centres*
- *Tourism and leisure enterprises that benefit the whole district*
- *Recognition of the role of heritage as a tourism attraction*

#### **Conserve and enhance the area**

- *High quality design in new developments*
- *Clean air and water*
- *Countryside, environment and heritage assets conserved and enhanced*
- *Attractive countryside providing for biodiversity and employment*
- *Effective reuse of existing buildings*
- *Conservation and enhancement of protected landscapes*

#### **Respect environmental limits**

- *Social and environmental benefits of development are optimised*
- *Developments use land, energy and resources effectively*
- *Waste is minimised and recycling rates are high*
- *Public transport, walking and cycling are encouraged*

- *Floodplains remain undeveloped*
- *Renewable energy projects within environmental limits*

An overall spatial strategy is then set out, stating that:

*In order to move towards achieving the Vision, development will be managed to:*

- *Create a prosperous economy which increases inward investment into the district.*
- *Guide appropriate levels of development to locations which are or can be made sustainable, achieving a suitable balance of housing, employment, facilities and other uses within towns, villages, neighbourhoods and rural areas.*
- *Reduce the need to travel by car, increasing the potential of public transport, cycling and walking.*
- *Reduce carbon emissions in support of national targets.*
- *Promote social inclusion and reduce inequalities by enhancing access for all to employment, services and housing.*

2.2 The spatial strategy is then followed by more specific strategies for the towns, villages and countryside.

2.3 Fifteen strategic policies are then set out, covering the following topics:

- S1: Presumption in favour of sustainable development.
- S2: Sustainable development priorities.
- S3: Amount and distribution of development.
- S4: Meeting housing needs.
- S5: Ensuring housing delivery.
- S6: Public open space.
- S7: Employment.
- S8: Town centres.
- S9: Infrastructure.
- S10: Environment.
- S11: Tiverton.
- S12: Cullompton.
- S13: Crediton.
- S14: Villages.
- S15: Countryside.

2.4 The 'Site Allocations' section of the document then goes on to identify development site allocations at Tiverton, Cullompton and Crediton, as well as the rural areas of the District.

2.5 Development management policies were included in the recently adopted Local Plan Part 3 (October 2013) and those policies are being brought forward into the new Local Plan, largely in their current form. However, a small number of changes have been made to the policies as they appear in the Local Plan Review in order to reflect recent changes to national policy, and these changes have been taken into account in the HRA.

## Potential impacts of the Local Plan Review on European Sites

2.6 **Table 2.1** below sets out the range of potential impacts that development in general and related activities may have on European sites.

**Table 2.1 Potential Impacts and Activities Adversely Affecting European Sites**

Broad categories and examples of potential impacts on European sites	Examples of activities responsible for impacts
<p><b>Physical loss</b></p> <ul style="list-style-type: none"> <li>• Removal (including offsite effects, e.g. foraging habitat)</li> <li>• Mine collapse</li> <li>• Smothering</li> <li>• Habitat degradation</li> </ul>	<p>Development (e.g. housing, employment, infrastructure, tourism)                      Infilling (e.g. of mines, water bodies)                      Alterations or works to disused quarries                      Structural alterations to buildings (bat roosts)                      Afforestation                      Tipping                      Cessation of or inappropriate management for nature conservation</p>
<p><b>Physical damage</b></p> <ul style="list-style-type: none"> <li>• Direct mortality</li> <li>• Sedimentation / silting</li> <li>• Prevention of natural processes</li> <li>• Habitat degradation</li> <li>• Erosion</li> <li>• Trampling</li> <li>• Fragmentation</li> <li>• Severance / barrier effect</li> <li>• Edge effects</li> <li>• Fire</li> </ul>	<p>Flood defences                      Dredging                      Mineral extraction                      Recreation (e.g. motor cycling, cycling, walking, horse riding, water sports, caving)                      Development (e.g. infrastructure, tourism, adjacent housing etc.)                      Vandalism                      Arson                      Cessation of or inappropriate management for nature conservation</p>
<p><b>Non-physical disturbance</b></p> <ul style="list-style-type: none"> <li>• Noise</li> <li>• Vibration</li> <li>• Visual presence</li> <li>• Human presence</li> <li>• Light pollution</li> </ul>	<p>Development (e.g. housing, industrial)                      Recreation (e.g. dog walking, water sports)                      Industrial activity                      Mineral extraction                      Navigation                      Vehicular traffic                      Artificial lighting (e.g. street lighting)</p>
<p><b>Water table/availability</b></p> <ul style="list-style-type: none"> <li>• Drying</li> <li>• Flooding / stormwater</li> <li>• Water level and stability</li> <li>• Water flow (e.g. reduction in velocity of surface water)</li> <li>• Barrier effect (on migratory species)</li> </ul>	<p>Water abstraction                      Drainage interception (e.g. reservoir, dam, infrastructure and other development)                      Increased discharge (e.g. drainage, runoff)</p>
<p><b>Toxic contamination</b></p> <ul style="list-style-type: none"> <li>• Water pollution</li> <li>• Soil contamination</li> <li>• Air pollution</li> </ul>	<p>Agrochemical application and runoff                      Navigation                      Oil / chemical spills                      Tipping                      Landfill                      Vehicular traffic                      Industrial waste / emissions</p>
<p><b>Non-toxic contamination</b></p> <ul style="list-style-type: none"> <li>• Nutrient enrichment (e.g. of soils and water)</li> <li>• Algal blooms</li> <li>• Changes in salinity</li> <li>• Changes in thermal regime</li> <li>• Changes in turbidity</li> <li>• Air pollution (dust)</li> </ul>	<p>Agricultural runoff                      Sewage discharge                      Water abstraction                      Industrial activity                      Flood defences                      Navigation                      Construction</p>
<p><b>Biological disturbance</b></p> <ul style="list-style-type: none"> <li>• Direct mortality</li> <li>• Out-competition by non-native species</li> </ul>	<p>Development (e.g. housing areas with domestic and public gardens)                      Predation by domestic pets</p>

<b>Broad categories and examples of potential impacts on European sites</b>	<b>Examples of activities responsible for impacts</b>
<ul style="list-style-type: none"> <li>• Selective extraction of species</li> <li>• Introduction of disease</li> <li>• Rapid population fluctuations</li> <li>• Natural succession</li> </ul>	<p>Introduction of non-native species (e.g. from gardens)</p> <p>Fishing</p> <p>Hunting</p> <p>Agriculture</p> <p>Changes in management practices (e.g. grazing regimes, access controls, cutting / clearing)</p>

## 3 Screening Methodology

- 3.1 HRA Screening of the Local Plan Review has been undertaken in line with current available guidance and seeks to meet the requirements of the Habitats Regulations. The tasks that have been undertaken during the screening stage of the HRA are described in detail below.
- 3.2 As described in **Chapter 1**, a draft version of the HRA report, including the screening exercise, was first produced in relation to the Options Consultation document (this was sent to Natural England for comment but was not made publicly available at that time). Comments made by Natural England at that time have been taken into account as the HRA report has been finalised to reflect the Publication Draft version of the Local Plan Review. An earlier draft of the updated HRA report was again sent to Natural England for comment and a small number of amendments were made in this final version on the basis of those comments.
- 3.3 The findings of the screening exercise for the Publication Draft version of the Local Plan (January 2015) are set out in full in **Appendix 3** of this report and are summarised in **Chapter 4**. Although the same broad approach was taken to the screening of the Options and Publication Draft versions of the Local Plan, certain tasks involved (such as identifying the European sites within and around the District) did not need to be undertaken again after the Options stage as the findings from that stage remain valid.

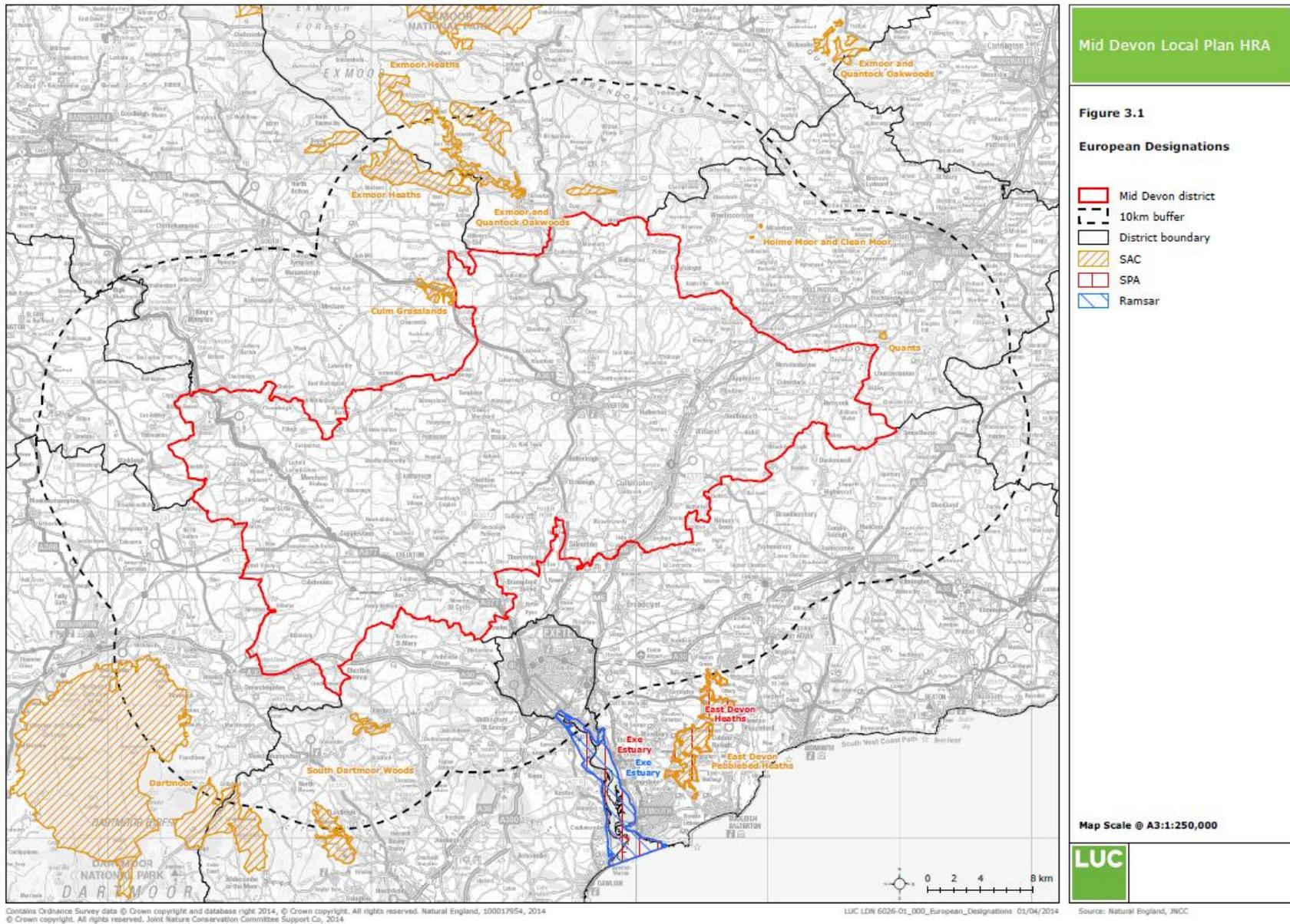
### Identification of European sites which may be affected by the Local Plan Review and the factors contributing to and defining the integrity of these sites

- 3.4 An initial investigation was undertaken to identify European sites within or adjacent to the Mid Devon District boundary which may be affected by the Local Plan Review. This involved the use of GIS data to map the locations and boundaries of European sites using publicly available data from Natural England. All European sites lying partially or wholly within 10km from the District boundary were included in order to address the fact that Local Plan policies may affect European sites which are located outside the administrative boundary of the District. This distance has been agreed with Natural England and is considered reasonable to ensure that all designated sites that could potentially be affected by development are identified and included in the assessment.
- 3.5 For some local authorities there is the possibility that sites beyond the 10km distance could be affected by development within the district in question, for example where the water resources used to supply the district come from a source that lies further afield and which is subject to European designation. Therefore, where information gathered during the HRA indicates that other European sites could be affected they should be considered in the assessment as appropriate.
- 3.6 There are no European sites within Mid Devon although there are 11 within 10km, the closest being the Culm Grasslands SAC which lies immediately adjacent to the north western boundary of Mid Devon District. The European sites within 10km are listed overleaf in **Table 3.1** and are mapped in **Figure 3.1** on the next page.

**Table 3.1 European Sites within 10km of Mid Devon District**

Special Areas of Conservation (SACs)	Special Protection Areas (SPAs)	Ramsar Sites
East Devon Pebblebed Heaths	Exe Estuary	Exe Estuary
Culm Grasslands	East Devon Heaths	
South Dartmoor Woods		
Holme Moor and Clean Moore		
Dartmoor		
Exmoor Heaths		
Quants		
Exmoor and Quantock Oakwoods		

**Figure 3.1 European sites within 10km of Mid Devon District**



- 3.7 The attributes of these sites which contribute to and define their integrity have been described (see **Appendix 1**). In doing so, reference was made to Standard Data forms for SACs and SPAs<sup>10</sup>. This analysis enabled European site interest features to be identified, along with the features of each site which determine site integrity and the specific sensitivities of the site. This information allows an analysis of how the potential impacts of the Local Plan Review may affect the integrity of each site.

## Assessment of 'likely significant effects' of the Local Plan Review

- 3.8 As required under Regulation 102 of the Conservation of Habitats and Species Regulations 2010<sup>11</sup> an assessment of the 'likely significant effects' of the Local Plan Review: Publication Draft document was undertaken. A screening matrix was prepared in order to assess which policies or site allocations would be likely to have a significant effect on European sites. The findings of the screening assessment are summarised in **Chapter 4** and the detailed matrix can be found in **Appendix 3**. A 'traffic light' approach was used to record the likely impacts of the policies and site allocations on European sites and their qualifying habitats and species, using the colour categories shown below.

Red	There are likely to be significant effects (Appropriate Assessment required).
Amber	There may be significant effects, but this is currently uncertain (Appropriate Assessment required).
Green	There are unlikely to be significant effects (Appropriate Assessment not required).

- 3.9 A risk-based approach involving the application of the precautionary principle was adopted in the assessment, such that a conclusion of 'no significant effect' was only reached where it was considered very unlikely, based on current knowledge and the information available, that a policy or site allocation would have a significant effect on the integrity of a European site.
- 3.10 Note that many of the development management policies in Section 4 of the Local Plan Review (Managing Development) have not been changed since they were brought forward from the adopted Local Plan Part 3 document, which was subject to HRA during its preparation. Therefore, only those policies that have been amended have been subject to HRA as part of the Local Plan Review.

## Screening assumptions and information used in reaching conclusions about likely significant effects

- 3.11 The screening stage of the HRA has taken the approach of screening each development strategy (policies S1-S15) individually, although the site allocations were grouped by geographical location where the likely significant effects that could be identified during the screening stage of the HRA would be broadly the same. During the screening stage the following assumptions were applied in relation to assessing the likely significant effects on European sites that may result from the Local Plan Review.

### Physical loss of habitat

- 3.12 Any development resulting from the Local Plan Review would be located within Mid Devon District; therefore loss of habitat from within the boundaries of a European site can be ruled out as there are none located within the District boundary. However, loss of habitat outside of the boundaries

<sup>10</sup> These were obtained from the Joint Nature conservation Committee and Natural England websites ([www.jncc.gov.uk](http://www.jncc.gov.uk) and [www.naturalengland.org.uk](http://www.naturalengland.org.uk))

<sup>11</sup> SI No. 2010/490

of a European site could still affect the integrity of that site if it occurs in an area used for offsite breeding, foraging or roosting by the qualifying species of the site. While most European sites within 10km of Mid Devon are located several kilometres from the District boundary or do not have transient species amongst their qualifying features, and so this potential effect would not be expected to occur, the Culm Grasslands SAC lies immediately adjacent to the District boundary and therefore the potential for the qualifying features of that site to be affected by habitat loss cannot be ruled out if development were to be located in that area of the District.

- 3.13 While the Exe Estuary SPA and East Devon Heaths SPA have bird species as their qualifying features, they are located at least 8km from Mid Devon at the closest point, with the city of Exeter in between. HRA work that was carried out for the Exeter City Core Strategy (Exeter lies between Mid Devon and the SPAs) indicates that the areas of offsite habitat that those birds depend on are located within closer proximity of the SPAs than Mid Devon District.

### **Noise, vibration and light pollution**

- 3.14 Noise and vibration effects, e.g. during the construction of new housing or other development, are most likely to disturb bird species and are thus a key consideration with respect to European sites where birds are the qualifying features, although such effects may also impact upon some mammals and fish species. Artificial lighting at night (e.g. from street lamps, flood lighting and security lights) is most likely to affect bat populations, and therefore have an adverse effect on the integrity of European sites where bats are a qualifying feature. We have assumed that the effects of noise, vibration and light are most likely to be significant if development takes place within 500 metres of a European site with qualifying features sensitive to these disturbances, or mapped off-site breeding, foraging or roosting areas. Therefore, only the Culm Grasslands SAC, which lies immediately adjacent to the District boundary, is close enough to potentially be affected by development within that area of Mid Devon District in relation to noise, vibration and light pollution.

### **Air pollution**

- 3.15 Air pollution is most likely to affect European sites where plant, soil and water habitats are the qualifying features, but some qualifying animal species may also be affected, either directly or indirectly, by any deterioration in habitat as a result of air pollution. Deposition of pollutants to the ground and vegetation can alter the characteristics of the soil, affecting the pH and nitrogen availability that can then affect plant health, productivity and species composition.
- 3.16 In terms of vehicle traffic, nitrogen oxides (NO<sub>x</sub>, i.e. NO and NO<sub>2</sub>) are considered to be the key pollutants. Deposition of nitrogen compounds may lead to both soil and freshwater acidification, and NO<sub>x</sub> can cause eutrophication of soils and water.
- 3.17 Based on the Highways Agency Design for Road and Bridges (DMRB) Manual Volume 11, Section 3, Part 1<sup>12</sup> (which was produced to provide advice regarding the design, assessment and operation of trunk roads (including motorways)), it is assumed that air pollution from roads is unlikely to be significant beyond 200m from the road itself. Where increases in traffic volumes are forecast, this 200m buffer needs to be applied to the relevant roads in order to make a judgement about the likely geographical extent of air pollution impacts.
- 3.18 The DMRB Guidance for the assessment of local air quality in relation to highways developments provides criteria that should be applied at the screening stage of an assessment of a plan or project, to ascertain whether there are likely to be significant impacts associated with routes or corridors. Based on the DMRB guidance, affected roads which should be assessed are those where:
- Daily traffic flows will change by 1,000 AADT (Annual Average Daily Traffic) or more; or
  - Heavy duty vehicle (HDV) flows will change by 200 AADT or more; or
  - Daily average speed will change by 10 km/hr or more; or
  - Peak hour speed will change by 20 km/hr or more; or

---

<sup>12</sup> *Design Manual for Road and Bridges*. Highways Agency. <http://dft.gov.uk/ha/standards/dmrb/index.htm>

- Road alignment will change by 5 m or more.
- 3.19 Traffic forecast data (based on the planned level of growth) are therefore needed to determine if increases in vehicle traffic in and around Mid Devon are likely to be significant. This data is set out in the study *Renewables and Air Quality: Reduced Transport Assessment in Support of Local Plan Review* (October 2014) which has been produced by Arup on behalf of the Council.
- 3.20 It has been assumed that only those roads forming part of the primary road network (motorways and 'A' roads) might be likely to experience any significant increases in vehicle traffic as a result of development (i.e. greater than 1,000 AADT). As such, where a site is within 200m of only minor roads, no significant effect from traffic-related air pollution was considered to be the likely outcome.
- 3.21 The European sites around Mid Devon that are within 200m of strategic roads are the Culm Grasslands SAC, Exe Estuary SPA and Exe Estuary Ramsar site. Therefore, where the Local Plan Review could result in an increase in vehicle traffic in and around Mid Devon, the potential for these sites to be affected as a result of increased air pollution was highlighted in the screening matrix and the potential for significant effects was considered further during the Appropriate Assessment stage of the HRA in light of transport assessment data.

### Impacts of recreation

- 3.22 Recreation activities and general human presence can have an adverse impact on the integrity of a European site as a result of physical disturbance, e.g. through erosion and trampling. Where policies or site allocations in the Local Plan Review are likely to result in an increase in the local population, or where an increase in tourism is considered likely, the potential for an increase in visitor numbers and the associated impacts at sensitive European sites has been identified.
- 3.23 At this stage of the assessment the broad potential for this type of impact to affect any of the European sites around Mid Devon District was highlighted, although it was recognised that those sites closest to the District, and the sites within National Parks where tourism is more likely to be focussed, are most likely to be affected.

### Water Quantity and Quality

- 3.24 South West Water's Water Resources Management Plan<sup>13</sup> (WRMP) states that sufficient water resources are expected to be available up to 2050 in both of the Water Resource Zones that cover Mid Devon District (Roadford and Wimbleball WRZs). This conclusion was based on population projections in the WRMP area which took into account the planned levels of growth in each Local Authority as well as other factors. Therefore, potential significant effects on European sites associated with increased demand for water abstraction were able to be ruled out of the assessment.
- 3.25 In terms of water quality, South West Water has advised<sup>14</sup> that, in terms of the identified growth to 2020 they would be able to accommodate this in terms of sewage treatment works capacity and potable water. While some localised improvements may be required to the sewerage networks/water distribution systems, these will be established once proposals for specific sites begin to come forward. Post-2020, South West Water will review any capacity issues in its subsequent business plans which are prepared on a five year cycle. Therefore, bearing in mind the mitigation provided by policies in the emerging Local Plan Review in relation to the provision of appropriate infrastructure to support new development (i.e. policy S9: Infrastructure), potential significant effects associated with water quality were able to be ruled out of the assessment.
- 3.26 It should also be noted that there are established regulatory mechanisms over the treatment of waste water that take into account environmental impacts including likely significant effects on European sites, which should provide safeguards to ensure no adverse effects on integrity arise.

<sup>13</sup> South West Water Water Resources Management Plan (June 2014)

<sup>14</sup> Email from South West Water to Mid Devon District Council 22<sup>nd</sup> May 2014

## Interpretation of 'likely significant effect'

- 3.27 Relevant case law helps to interpret when effects should be considered as a likely significant effect, when carrying out HRA of a land use plan.
- 3.28 In the Waddenzee case<sup>15</sup>, the European Court of Justice ruled on the interpretation of Article 6(3) of the Habitats Directive (translated into Reg. 102 in the Habitats Regulations), including that:
- An effect should be considered 'likely', "if it cannot be excluded, on the basis of objective information, that it will have a significant effect on the site" (para 44).
  - An effect should be considered 'significant', "if it undermines the conservation objectives" (para 48).
  - Where a plan or project has an effect on a site "but is not likely to undermine its conservation objectives, it cannot be considered likely to have a significant effect on the site concerned" (para 47).
- 3.29 A recent opinion delivered to the Court of Justice of the European Union<sup>16</sup> commented that:
- "The requirement that an effect in question be 'significant' exists in order to lay down a de minimus threshold. Plans or projects that have no appreciable effect on the site are thereby excluded. If all plans or projects capable of having any effect whatsoever on the site were to be caught by Article 6(3), activities on or near the site would risk being impossible by reason of legislative overkill."*
- 3.30 This opinion (the 'Sweetman' case) therefore allows for the authorisation of plans and projects whose possible effects, alone or in combination, can be considered 'trivial' or *de minimus*; referring to such cases as those "that have no appreciable effect on the site". In practice such effects could be screened out as having no likely significant effect; they would be 'insignificant'.

## Mitigation provided by the policies

- 3.31 Some of the potential effects identified could be mitigated through the implementation of policies in the Local Plan Review, including the development management policies that are being carried forward from the adopted Local Plan Part 3. These include policies relating to the provision of improved sustainable transport links which could help to mitigate potential increases in air pollution associated with increased vehicle traffic, and the provision of green infrastructure within new developments which may help to relieve increases in visitor pressure at European sites. There are also policies with the specific purpose of protecting and enhancing the environment, including biodiversity. In addition, the site allocations policies include detailed criteria relating to issues such as sustainable transport and the provision of green infrastructure, which may provide further mitigation for the potential effects of development.
- 3.32 This potential mitigation has been taken into consideration during the screening process and has influenced the screening conclusions (see **Appendix 3** and **Chapter 4**). Where it has been possible to conclude that there would be no likely significant effects taking into account mitigation, then there is no need to consider 'in-combination effects', nor to carry out Appropriate Assessment.

## Identification of other plans and projects which may have 'in-combination' effects

- 3.33 Regulation 102 of the Amended Habitats Regulations 2010 requires an Appropriate Assessment where "a land use plan is likely to have a significant effect on a European site (either alone or in combination with other plans or projects) and is not directly connected with or necessary to the

---

<sup>15</sup> ECJ Case C-127/02 "Waddenzee" Jan 2004.

<sup>16</sup> Advocate General's Opinion to CJEU in Case C-258/11 Sweetman and others v An Bord Pleanala 22nd Nov 2012.

*management of the site*". Therefore, where likely significant effects are identified, it is necessary to consider whether there may also be significant effects in combination with other plans or projects.

- 3.34 The first stage in identifying 'in-combination' effects involves identifying which other plans and projects in addition to the Local Plan Review may affect the European sites that were the focus of this assessment. There are a large number of potentially relevant plans and projects which could be considered; therefore the review at this stage focused on planned spatial growth within the authorities adjacent to Mid Devon District as well as other relevant plans such as minerals and waste plans, transport plans and water-related plans. **Appendix 2** lists the plans that were reviewed, outlining the components of each plan that could have an impact on nearby European sites and considering the findings of the accompanying HRA work (where available).
- 3.35 The purpose of the review of other plans was to identify any components that could have an impact on the European sites that could also be significantly affected by the Local Plan Review, e.g. proposals for development near to these sites which could have implications in terms of increased traffic, water use and recreation pressures and infrastructure development. The potential for the effects of these plans to combine with the effects of the Local Plan Review has been considered in the next chapter and will continue to be assessed where necessary during further iterations of the HRA.

## 4 Screening Findings

### Screening of the Local Plan Review: Publication Draft

- 4.1 As described in **Chapter 3**, a screening assessment was carried out in order to identify the likely significant effects of the Local Plan Review: Publication Draft (January 2015) on the European sites around Mid Devon District. The detailed screening matrix used for this assessment can be found in **Appendix 3** and the findings are summarised below.

Note that where the Screening findings suggested that a significant effect was either likely or uncertain, a more detailed assessment was triggered under Stage 2 of the HRA, Appropriate Assessment – the findings of which are described in **Chapter 5** of this report. The screening findings below are therefore not the final conclusions of this HRA; indeed a number of the screening conclusions are superseded by the findings of the Appropriate Assessment stage, i.e. some of the uncertainty regarding the likelihood of significant effects was able to be clarified with the result that an adverse effect on the integrity of the European site in question was able to be ruled out.

#### Significant effects likely

- 4.2 None of the policies or site allocations in the Local Plan Review Publication Draft document are considered likely to have a significant effect on the European sites within 10km of Mid Devon.

#### Significant effects unlikely

- 4.3 Significant effects are considered unlikely in relation to the Vision and Spatial Strategy as well as for several of the strategic policies, as listed below. In most cases this was because the policies would not directly result in development, either because they relate to qualitative criteria for development or because they are of a more strategic nature and will be delivered through other, more specific policies which have been screened separately for their effects on European sites. A small number of the policies include specific measures intended to conserve or enhance the natural environment and so are considered unlikely to have an adverse effect on European sites for that reason.
- 4.4 The Vision and Spatial Strategy and the following policies were screened out (i.e. considered unlikely to have significant effects) on the basis that they will not lead directly to development:
- Policy S1: Presumption in favour of sustainable development.
  - Policy S5: Ensuring housing delivery.
  - Policy S6: Public open space.
- 4.5 The following policies were screened out on the basis that they include measures designed to protect or enhance the quality of the natural environment:
- Policy S2: Sustainable development priorities.
  - Policy S10: Environment.
- 4.6 One policy was screened out on the basis that it would steer development into urban areas and therefore away from sensitive European sites:
- Policy S8: Town Centres.
- 4.7 Another policy was screened out on the basis that, while it could result in small-scale development, effects on European sites would not be expected to be significant:
- Policy S15: Countryside.

- 4.8 On the basis of these screening conclusions the policies listed above did not need to be considered further during the Appropriate Assessment stage (although some are relevant in terms of the potential mitigation they might help to provide for other proposals that may affect European sites).

### Screening effects uncertain

- 4.9 Uncertain effects have been highlighted in the Screening matrix (see **Appendix 3**) for some of the strategic policies and all of the site allocations. In most cases this is because a proposal makes provision for development on a scale which may result in effects on European sites (either alone or in combination), but until the nature of likely significant effects on the integrity of the European sites have been examined in more detail it is not possible to rule out the possibility of likely significant effects.
- 4.10 Those policies for which it is uncertain whether significant effects on European sites are likely to occur are summarised below and, on the basis of this screening conclusion, were considered in more detail during Stage 2 of the HRA, the Appropriate Assessment (see **Chapter 5**).

#### *Strategic policies*

- 4.11 The uncertainties associated with the strategic policies listed below exist because development of some form will result, although until the nature of likely significant effects on the integrity of the European sites have been examined in more detail, it is not possible to rule out the possibility of likely significant effects:
- Policy S3: Amount and distribution of development
  - Policy S4: Meeting housing needs.
  - Policy S7: Employment.
  - Policy S9: Infrastructure.
  - Policy S11: Tiverton.
  - Policy S12: Cullompton.
  - Policy S13: Crediton.
  - Policy S14: Villages.
- 4.12 The potential effects of these policies are broad ranging. All could result in increased recreation pressure which may result in erosion/trampling and disturbance at European sites. This effect could potentially be experienced at any of the European sites around Mid Devon. Increased air pollution from vehicle traffic may also result, which could affect the European sites that lie within 200m of the strategic road network (Culm Grasslands SAC, Exe Estuary SPA and Exe Estuary Ramsar site).
- 4.13 In the case of strategic policies S3, S4, S7 and S9 it is possible that effects relating to the physical loss of offsite habitat as well as non-physical disturbance (such as noise/vibration and light pollution) could occur at the Culm Grasslands SAC as these policies could result in development anywhere in the District, including potentially along the north western edge of Mid Devon in close proximity of the SAC.
- 4.14 However, strategic policies S11, S12, S13 and S14 would not be expected to result in non-physical disturbance or loss of offsite habitat at the Culm Grasslands SAC or any other European sites as development under those policies would be focussed in locations that are too far from the nearest European sites for such effects to occur.

#### *Site allocation policies*

- 4.15 All of the site allocation policies at Tiverton, Cullompton and Crediton, as well as the site allocations in the rural areas, have been identified as potentially having significant effects on European sites. The allocations in combination will deliver development of a scale that may result in increased vehicle traffic and associated air pollution, and increased pressure for recreation that could result in disturbance at European sites. The allocation of development sites in rural areas may be particularly likely to generate additional vehicle traffic as a result of the relatively poorer public transport provision in those areas.

- 4.16 The site allocations at Tiverton, Cullompton and Crediton and in the rural areas would not be expected to result in the loss of offsite habitat or non-physical disturbance from noise/vibration or light pollution, due to the distance of all of the site allocations from the nearest European sites.

### Changes to LP3 policies

- 4.17 As well as the strategic policies and site allocation options, the Local Plan Review document also includes policies that have been brought forward from the adopted Local Plan Part 3: Development Management Policies. Although most of these policies are unchanged, a number have been either deleted or amended and those policies have been included in this HRA screening exercise.
- 4.18 The following proposed changes would have no likely significant effects as they would not result in development:
- Replacement of policy relating to Presumption in favour of Sustainable Development with Policy S1 in the strategic section of the new Local Plan (and renumbering of subsequent policies in this section).
  - Removal of text from policy relating to High Quality Design stating that 'major residential development proposals will be required to achieve 'green' status under at least 8 of the 12 Building for Life criteria.'
  - Deletion of policy relating to Sustainable Design.
  - Amendment to policy relating to Parking – addition of the word 'minimum' before the non-residential car and cycle parking standards and deletion of standards for electric vehicle infrastructure.
  - Deletion of policy relating to Cross Subsidy of Affordable Housing on Exception Sites.
  - Removal of text from policy relating to Design of Housing stating that 'on sites of 10 houses or more the provision of 20% of dwellings built to the lifetime homes standard'.
  - Deletion of policy relating to Dwelling Sizes.
  - Revisions to policy relating to Protection of Local Green Space and Recreational Land/Buildings.
  - Revisions to policy relating to Green Infrastructure in Major Developments.
  - Revisions to policy relating to Other Protected Sites.
- 4.19 The following change could permit small-scale development, but would not be expected to have significant effects on European sites due to the scale and likely location of the development:
- Replacement of adopted Local Plan Part 3 policy relating to Cross Subsidy of Affordable Housing on Exception Sites with a new rural exceptions site policy.

### Potential Mitigation

- 4.20 A number of the policies in the Local Plan Review: Publication Draft document include reference to measures which could provide mitigation against some of the potential significant effects identified. These include strategic policy S10: Environment which makes specific reference to the protection of biodiversity sites, and policies that refer to providing sustainable transport links (reference to this is made in strategic policy S2: Sustainable Development Priorities as well as a number of the site allocations policies). Policy S2 also specifically refers to the need to protect European designated wildlife sites. In addition, where policies refer to the provision of open space and green infrastructure within new development (in particular strategic policy S6: Public Open Space), this may help to relieve potential increases in recreation pressure at European sites.
- 4.21 Some of the policies that have been brought forward into the new Local Plan from the adopted Local Plan Part 3: Development Management Policies will also provide mitigation. These include DM4: Transport and Air Quality, DM5: Pollution and DM26: Green Infrastructure in Major Development.

## In-combination Effects

- 4.22 As described in **Chapter 2**, where likely significant effects have been identified in relation to the Local Plan Review, it is necessary also to consider the potential for in-combination effects. A review was undertaken of other plans and projects that may result in in-combination effects with the new Mid Devon Local Plan. The findings of this exercise can be seen in full in **Appendix 2** and are summarised below.
- 4.23 In many cases, the HRA work carried out in relation to neighbouring districts plans and other local plans and strategies did not highlight any likely significant negative effects and therefore the potential for in-combination effects with Mid Devon's Local Plan could be ruled out. This was the case for:
- North Devon and Torrridge Local Plan (Publication Draft version, June 2014)
  - West Somerset Local Plan to 2032 (Revised Draft Preferred Strategy).
  - Teignbridge Local Plan 2013-2033 (Proposed Submission).
  - Taunton Deane (Adopted Core Strategy 2011-2028).
  - Dartmoor National Park Adopted Core Strategy (2008).
  - Dartmoor National Park Adopted Development Management and Delivery Development Plan Document (2013).
  - Exmoor National Park Draft Local Plan (Consultation ended December 2013).
  - Exeter City Council Adopted Core Strategy (2012).
  - The Devon Waste Plan Pre-Submission Consultation (2013).
  - Devon and Torbay Local Transport Plan 3 2011-2026.
  - Somerset Future Transport Plan 2011-2026 (Somerset County Council).
- 4.24 In a number of other cases, HRA work does not appear to be available, either because the plan in question is at an early stage in its development or because HRA work has not been published for the plan, or because the HRA has not yet reached a stage where a final conclusion has been reached. In these cases, further consideration will need to be given to the potential for in-combination effects during any further HRA work that may be carried out for the Mid Devon Local Plan Review once the HRA work for other plans may have been progressed further. This was the case for:
- West Devon Adopted Core Strategy (2006-2026).
  - East Devon Local Plan 2006 – 2026 (Proposed Submission Publication, November 2012).
  - Taunton Deane Site Allocations and Development Management Plan Preferred Options (Consultation ended December 2013).
  - Exeter City Council Draft Development Delivery DPD (2013). Devon Minerals Plan 2011-2031 Options Consultation (2011).
- 4.25 It is also important to consider the potential effects of the Mid Devon Local Plan Review as a whole on European sites. The total number of new homes required in Mid Devon District is 7,100, and the Local Plan Review includes site allocations that will result in over-delivery of about 8% (a total of 7,694 new homes). The majority of this development will be focussed in and around the three main towns of Tiverton, Cullompton and Crediton, all of which are located some distance from the nearest European sites. However, the overall scale of the development proposed in Mid Devon could combine to result in increases in vehicle traffic, particularly on the M5, and an increase in recreation pressure. Therefore, the potential for the development proposed in the District to cumulatively affect European sites as a result of those pressures is recognised and has been considered during the Appropriate Assessment stage of the HRA.

# 5 Appropriate Assessment Methodology and Findings

## Appropriate Assessment Methodology

- 5.1 Following the screening stage, the plan-making authority is required under Regulation 102 of the Habitats Regulations 2010 to make an 'Appropriate Assessment' of the implications of the plan for European sites, in view of their conservation objectives. EC Guidance<sup>17</sup> states that the Appropriate Assessment should consider the impacts of the plan (either alone or in combination with other projects or plans) on the integrity of European sites with respect to their conservation objectives and to their structure and function.
- 5.2 A site's integrity depends on it being able to sustain its 'qualifying features' (i.e. those Annex 1 habitats, Annex II species, and Annex 1 bird populations for which it has been designated) and to ensure their continued viability. A high degree of integrity is considered to exist where the potential to meet a site's conservation objectives is realised and where the site is capable of self-repair and renewal with a minimum of external management support. The Appropriate Assessment therefore needs to focus on those impacts judged likely to have an effect on the qualifying features of European sites, or where insufficient certainty regarding this remained at the screening stage.
- 5.3 An Appropriate Assessment has therefore been undertaken for all of the European sites in Mid Devon District (+10km) where likely significant or uncertain effects from the Local Plan Review were identified (or were not able to be ruled out) during the screening stage (the screening findings are summarised in **Chapter 4** and are shown in full in **Appendix 3**). The Appropriate Assessment findings are summarised in this chapter and are set out in full in **Appendix 4**.
- 5.4 The Appropriate Assessment focuses on those impacts that are judged likely to have a significant effect on the qualifying features of a European site, or where insufficient certainty regarding this remained at the screening stage. As described in **Chapter 1**, a conclusion needs to be reached as to whether or not a policy or site allocation in the Local Plan Review would adversely affect the integrity of a European site. In order to try to reach a conclusion, consideration was given to whether the predicted impacts of the proposals (either alone or in combination) have the potential to:
- Delay the achievement of conservation objectives for the site.
  - Interrupt progress towards the achievement of conservation objectives for the site.
  - Disrupt factors that help to maintain the favourable conditions of the site.
  - Interfere with the balance, distribution and density of key species that are the indicators of the favourable condition of the site.
- 5.5 In order to make a judgement about the likelihood of proposals having an adverse effect on the integrity of a European site, an Appropriate Assessment matrix was drawn up (see **Appendix 4**), which considered separately each of the sites which may be affected by a policy or group of site allocations, allowing for the fact that the qualifying features of each site vary. The conservation objectives for each European site are generally to maintain the qualifying features in favourable condition.
- 5.6 For each European site where an uncertain effect was identified at the screening stage in relation to a policy or group of site allocations in the Local Plan (i.e. those shaded orange in the screening matrix in **Appendix 3**), the potential impacts were set out and judgements made (based on the

---

<sup>17</sup> *Assessment of plans and projects significantly affecting European sites. Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC.* European Commission Environment DG, November 2001.

information available) regarding whether the impact is likely to affect the integrity of the site and if mitigation measures may be implemented to reduce the likelihood or severity of the potential impact. In making these judgements, the following assumptions and data sources were used in relation to the potential impacts identified at the screening stage.

### Physical loss or damage to habitat

- 5.7 For direct loss of habitat, it was assumed at the screening stage that effects from development would not be significant unless the development extends within an offsite area of known foraging, roosting or breeding habitat that supports species for which a European site is designated. This meant that only the Culm Grasslands SAC had the potential to be affected through physical loss or damage to habitat as all other European sites (including offsite foraging, breeding and roosting areas) were too far from Mid Devon to be affected in this way by development taking place within the District.
- 5.8 During the Appropriate Assessment, consideration has been given to the qualifying features of the Culm Grasslands SAC. Only transient species that rely on the presence or quality of particular habitats (e.g. hedges) for offsite movements and activities could be significantly affected. Therefore, it is assumed that only the marsh fritillary butterfly could be the subject of a significant effect in relation to loss or damage to habitats (the other qualifying features of the site are not transient species). Closer consideration has also been given to the potential mitigation for this possible effect.

### Noise, vibration and light pollution

- 5.9 Noise and vibration effects, e.g. those caused by the construction of new development are most likely to disturb bird species and are thus a key consideration with respect to European sites where birds are the qualifying features, although other species including insects may also be affected. Artificial lighting at night (e.g. street lamps, flood lighting and security lights) is more likely to affect bat populations but some bird species may also be affected.
- 5.10 It has been assumed that the effects of noise, vibration and light in relation to direct impacts from development are more likely to be significant if development takes place within 500 metres of a European site with qualifying features that are sensitive to these types of disturbance. There is also evidence of 300m being used as a distance up to which certain bird species can be disturbed by the effects of noise<sup>18</sup>. However, it has been assumed (on a precautionary basis) that the effects of noise, vibration and light pollution are most likely to cause an adverse effect if development takes place within 500 metres of a European site with qualifying features sensitive to these disturbances, or mapped off-site breeding, foraging or roosting areas. Therefore, only the Culm Grasslands SAC could be close enough to be affected by noise, vibration or light pollution as a result of development in Mid Devon District.

### Air pollution

- 5.11 As described in **Chapter 2**, based on the Highways Agency Design for Road and Bridges Manual<sup>19</sup> it is assumed that air pollution from roads is most likely to be significant up to 200 metres from the road itself. On this basis, air pollution-related impacts were able to be ruled out for most of the European sites around Mid Devon at the screening stage as those sites do not lie within 200m of the strategic road network. At the screening stage the following European sites were identified as having the potential to be affected by air pollution as a result of proposals in the new Local Plan, due to their proximity to strategic roads: Culm Grasslands SAC (within 200m of the A361 between Tiverton and Barnstaple), Exe Estuary SPA and Exe Estuary Ramsar site (both within 200m of the M5 between junctions 30 and 31).
- 5.12 Air pollution from traffic is most likely to affect European sites which have plant, soil and water habitats amongst their qualifying features but some qualifying animal species may also be directly affected, or indirectly affected by deterioration in habitat. Therefore, where European sites do not include species that are vulnerable to these impacts amongst their qualifying features, air pollution-related effects can be ruled out. The qualifying heathland habitats of the Culm

---

<sup>18</sup> *British Wildlife Magazine*. October 2007.

<sup>19</sup> Highways Agency Design for Road and Bridges Manual Volume 11, Section 3, Part 1

Grassland SAC are known to be vulnerable to the effects of air pollution; however the Exe Estuary SPA and Ramsar site have only bird species that are not known to be sensitive to air pollution as their qualifying features.

- 5.13 Nitrogen dioxides (NOx) are considered to be the key pollutants from traffic emissions. Deposition of nitrogen compounds may lead to both soil and freshwater acidification, and NOx can cause eutrophication of soils and water.
- 5.14 For the Culm Grasslands SAC, consideration was given to the potential for increases in traffic volume and speed on the A361 between Tiverton and Barnstaple to be significant, based on the criteria set out in **Chapter 2**.

### Recreation pressure

- 5.15 Consideration was given to the specific features and characteristics of each European site and its particular vulnerability to recreation activities, including whether it is known to already be under pressure from visitors. Where available, other plans and evidence studies were reviewed for information, such as the Management Plan for Dartmoor National Park (which includes Dartmoor SAC) and the Exe Estuary Visitor Survey.
- 5.16 The distance between European sites and proposed development locations in Mid Devon, as well as general accessibility, was also considered and this informed judgements about the likely nature of visits (i.e. whether day-to-day activities such as dog walking might be expected to take place).

### Water quantity and quality

- 5.17 As described in **Chapter 2**, significant effects on water quality and quantity were able to be ruled out at the screening stage and therefore did not need to be included in the Appropriate Assessment.

## Appropriate Assessment Findings

### Physical loss or damage to habitat and noise/vibration or light pollution

- 5.18 Only the Culm Grasslands SAC is within close enough proximity of Mid Devon to be affected by physical loss of, or disturbance to, offsite habitat, or noise, vibration and light pollution as a result of development within the District. While some of the qualifying features of the SAC are habitats that are not vulnerable to these effects, the qualifying marsh fritillary butterfly is a transient species which may make use of offsite areas for breeding and other activities and is also potentially vulnerable to the effects of noise/vibration. It is not likely to be affected by light pollution.
- 5.19 However, the area of the District in which development would need to occur for these effects to be possible is small and peripheral and does not include any major towns/villages or locations where site allocations are included in the Local Plan review. Any such development in that area is therefore expected to comprise only individual rural dwellings in exceptional circumstances and is not expected to be of a scale that is likely to affect the integrity of the SAC in relation to offsite loss of habitat or noise/vibration, particularly taking into account mitigation.
- 5.20 There is already some mitigation in the Local Plan Review in relation to the potential effects on offsite areas of importance to the integrity of the SAC or disturbance from construction, including the implementation of policies S2: Sustainable Development Priorities and S10: Environment, both of which aim to ensure that new development conserves and enhances the natural environment including biodiversity. In particular, policy S2 requires developments to minimise impacts on biodiversity by protecting European designated wildlife sites. Therefore, it is concluded that there will be no likely significant effect from the new Local Plan on the integrity of the Culm Grasslands SAC in relation to the loss of or damage to offsite habitat or noise/vibration or light pollution.

## Air pollution

- 5.21 The only European site that has qualifying features that are vulnerable to air pollution and that is within 200m of a main route leading into and out of Mid Devon District is the Culm Grasslands SAC (the A361 between Tiverton and Barnstaple cuts directly through the site).
- 5.22 Mid Devon District Council has commissioned a transport assessment<sup>20</sup> in relation to the growth resulting from the Local Plan Review. This assessment is based on the levels of growth proposed and the specific site allocations in the Publication Draft version of the Local Plan Review.
- 5.23 The transport assessment identifies baseline flows for various routes in and around Mid Devon District in 2033, in the absence of the Local Plan Review. It then sets out the likely increases in traffic movements along those routes as a result of the development proposed through the Local Plan Review. In order to identify whether these increases are potentially significant in terms of the HRA it is necessary to consider the increases in terms of Average Annual Daily Traffic movements (AADT), as well as projected increases in daily average speed.
- 5.24 The supporting data for the transport assessment<sup>21</sup> shows that the implementation of the Local Plan Review is expected to result in an increase in AADT along the A361 between Tiverton and Barnstaple of 251 in a north westerly direction and 256 in a south easterly direction – an increase in AADT of 507). Therefore, in relation to the criteria set out in the Design Manual for Roads and Bridges (described in **Chapter 2**), this increase is not considered to be significant as it is an increase of less than 1,000 AADT.
- 5.25 It is noted that there is a small discrepancy between the site allocations that were taken into account in the traffic assessment and those set out in the Local Plan Review – the Lapford rural site allocation for 18 houses that is referred to in the transport assessment is no longer included in the Publication Draft version of the Local Plan Review. This minor change is not expected to have a notable impact on the predicted increase in AADT along the A361, and any change that did occur would be expected to represent a decrease in traffic growth as the site allocation has not been included in the latest version of the Local Plan Review.
- 5.26 The transport assessment also concludes that the increased traffic is unlikely to result in a change in daily average speed of 10 km/hr or more in the vicinity of the Culm Grassland SAC.
- 5.27 **It is therefore possible to conclude that there will be no likely significant effect on the Culm Grasslands SAC as a result of increased air pollution.**

## Recreation pressure

- 5.28 Many of the European sites around Mid Devon are vulnerable to the effects of erosion/trampling from recreation (e.g. heathland habitats) and several sites include birds and other qualifying species that could be affected by disturbance, in particular the sites to the south of Mid Devon (Exe Estuary SPA and Ramsar Site, East Devon Pebblebed Heaths SAC and East Devon Heaths SPA).
- 5.29 However, the distance of most European sites around Mid Devon from the District, and in particular the locations that will be the main focus of development (Tiverton, Crediton and Cullompton) means that a significant increase in day-to-day visitor numbers at any of the European sites for activities such as dog walking is not considered likely.
- 5.30 While there may still be some increase in visits to sites such as Dartmoor SAC, South Dartmoor Woods SAC and the East Devon Heaths SAC which are known to be popular visitor destinations, there are a wide range of mitigation measures already in place, for example through the Dartmoor National Park Management Plan and the South East Devon European Site Mitigation Strategy that should help to avoid adverse effects. In addition, policies within the new Local Plan will help to ensure that green infrastructure is included within development sites.
- 5.31 **Therefore, it is concluded that there are no likely significant effects as a result of increased recreation pressure from the new Local Plan.**

---

<sup>20</sup> Arup (October 2014) Renewables and Air Quality Reduced Transport Assessment in Support of Local Plan Review.

<sup>21</sup> Provided by Arup 13/08/14

## Recommendations

5.32 The draft version of this HRA report that was produced made a number of recommendations for the new Local Plan as it was progressed. These recommendations (shown in bold) have been addressed, as set out below.

- **Specific reference to the protection of European sites, in particular the Culm Grasslands, should be incorporated into the development management policies as they are brought forward into the new Local Plan from LP3.** Policy DM30 in LP3 could be strengthened to this effect and specific reference to the need to protect habitats that support the marsh fritillary butterfly should be incorporated into the supporting text. *In the Publication Draft version of the Local Plan Review, policy S2 has been amended to make reference to the need to protect biodiversity at European sites.*
- **The traffic assessment work that is being carried out currently should give particular consideration to the likely increase in traffic flows along the stretch of the A361 that runs through the Culm Grasslands SAC,** so that this work can be drawn on to inform later iterations of the HRA. *The emerging traffic assessment that is being produced by Arup on behalf of Mid Devon District Council (described earlier in this chapter) has demonstrated that the increase in Average Annual Daily Traffic movements along the A361 between Tiverton and Barnstaple that will result from the implementation of the Local Plan Review (Publication Draft version) will not be of a level considered to have potential significant effects in terms of air quality at the Culm Grasslands SAC.*
- **The Council must satisfy itself through discussions with South West Water that the proposed growth can be accommodated without exceeding the capacity of sewage treatment works and within the available water supply.** This will involve ongoing discussions between the Council and South West Water once more detailed proposals have been worked up by the Council in relation to the sites to be allocated. This information can then be drawn upon to inform later iterations of the HRA. *Mid Devon District Council has been advised by South West Water that it expects to be able to accommodate the planned growth up to 2020 in terms of sewage treatment works capacity and potable water. Beyond that period, South West Water will review any capacity issues in its subsequent business plans which are prepared on a five year cycle.*

## 6 Conclusions

- 6.1 The HRA of the Mid Devon Local Plan Review (Publication Draft version) has been undertaken in accordance with currently available guidance and based on a precautionary approach as required under the Habitats Regulations. The overall HRA findings reached during the Appropriate Assessment stage have been summarised in **Chapter 5** of this report, and the justification for these is explained in more detail in **Appendix 4**. The HRA conclusions and recommendations are summarised below.
- 6.2 Providing that the identified mitigation is implemented, adverse effects on the integrity of European sites around Mid Devon from policy and site options in the new Local Plan, either alone or in combination with other plans, will not occur in relation to:
- Air pollution.
  - Changes to water quality or quantity.
  - Physical loss or damage to offsite habitat, or noise/vibration and light pollution.
  - Recreation.
- 6.3 A number of recommendations for the new Local Plan were made in the earlier draft HRA Report for the Options Consultation version of the Local Plan Review in order to reduce the potential for significant effects on European sites, and these have now been addressed, as described in **Chapter 5**.

### Next Steps

- 6.4 This HRA report will be sent to Natural England for comment, and the findings will be taken into account as the Local Plan Review is finalised. The HRA (both screening and Appropriate Assessment stages) will need to be updated to reflect any further changes that may be made to the policies and site allocations in the Local Plan Review before it is submitted for Examination.

LUC  
March 2015

## **Appendix 1**

### Attributes of European Sites within Mid Devon District (+10km)

Site Name	Area (ha)	Location	Qualifying Features	Key vulnerabilities and environmental conditions to support site integrity
Culm Grasslands SAC	768.7	Adjacent to the north western boundary of Mid Devon District.	<p><u>Annex I habitats that are a primary reason for selection of this site</u></p> <p>6410 Molinia meadows on calcareous, peaty or clayey-silt-laden soils (Molinion caeruleae)</p> <p>Culm Grasslands represents Molinia meadows in south-west England. This site contains extremely diverse examples of the heathy type of M24 Molinia caerulea – Cirsium dissectum fen-meadow, ranging from short, grazed swards through to stands that are transitional to scrub. Structural diversity accounts for the conservation of a wide range of flora and fauna, particularly of species characteristic of south-western Europe, such as meadow thistle Cirsium dissectum and whorled caraway Carum verticillatum.</p> <p><u>Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site</u></p> <p>4010 Northern Atlantic wet heaths with Erica tetralix</p> <p><u>Annex II species that are a primary reason for selection of this site</u></p> <p>1065 Marsh fritillary butterfly Euphydryas (Eurodryas, Hypodryas) aurinia</p> <p>Culm Grasslands in south-west England contains the largest cluster of sites for marsh fritillary Euphydryas aurinia in the south-west peninsula. It is judged to be the most important location for the species in its major south-west stronghold.</p>	<p>Culm Grassland is the local name given to the unimproved pastures which support a distinctive array of wildlife on the Culm Measures of northern Devon and north-east Cornwall. The grassland is a result of human activity, and to survive it must continue to be managed. The traditional methods upon which these meadows depend are rough summer grazing, selective burning and topping, and no application of fertilisers.</p> <p>Such management may no longer be economic; therefore, a Wildlife Enhancement Scheme (WES) is being used to promote the continuation of traditional management. The scheme has achieved a 95% uptake rate with owner-occupiers.</p> <p>The site is generally too wet to attract many visitors, so is not under significant pressure from walkers or dogs.</p> <p>The A361 runs through the SAC and is the main trunk road between the M5 and north Devon, providing a vital tourism link to the coast and far south west and Natural England has advised that species sensitive to nitrite pollution from vehicle emissions are present within 200m of the road.</p>

Site Name	Area (ha)	Location	Qualifying Features	Key vulnerabilities and environmental conditions to support site integrity
Quants SAC	20.3	Approximately 600m to the east of Mid Devon.	<p><u>Annex II species that are a primary reason for selection of this site</u></p> <p>1065 Marsh fritillary butterfly <i>Euphydryas</i> (<i>Eurodryas</i>, <i>Hypodryas</i>) <i>aurinia</i></p> <p>This damp and sheltered site supports a medium-sized but strong marsh fritillary <i>Euphydryas aurinia</i> population in a neutral grassland/fen mosaic. It is strategically placed close to other smaller sub-populations, with which it forms a metapopulation, and may exchange individuals with the large population at Southey Moor (outside the SAC series).</p>	<p>The marsh fritillary population here is restricted to a comparatively small area (c. 2 ha) and is kept high by a considerable level of management directed at producing 'ideal' habitat in this area. If the highly interventionist nature of management is disrupted or discontinued the population may drop.</p> <p>Beyond the designated SAC itself, marsh fritillary butterflies are dependent on habitat configurations that help the butterflies to disperse, and this is an important factor in maintaining the butterfly population.</p>
Exmoor Heaths SAC	10,705.7	Approximately 1.3km to the north of Mid Devon District.	<p><u>Annex I habitats that are a primary reason for selection of this site</u></p> <p>4010 Northern Atlantic wet heaths with <i>Erica tetralix</i></p> <p>Exmoor is representative of upland wet heath in south-west England. M15 <i>Scirpus cespitosus</i> – <i>Erica tetralix</i> wet heath predominates on gently-sloping and level ground. It is extremely variable in nature and has in places been modified by management, particularly burning. Typically, heather <i>Calluna vulgaris</i> dominates, with scattered plants of purple moor-grass <i>Molinia caerulea</i>, cross-leaved heath <i>Erica tetralix</i>, bilberry <i>Vaccinium myrtillus</i> and deergrass <i>Trichophorum cespitosum</i>. In other areas <i>Molinia</i> and <i>Calluna</i> are more-or-less co-dominant, with the former forming tussocks. There are transitions to H12 <i>Calluna vulgaris</i> –</p>	<p>These heathlands retain significant areas of mature heather stands. This habitat is dependent upon low-intensity, traditional agricultural management by grazing and controlled burning. Such management is becoming less economic, except with agri-environment funds. An ESA scheme has been useful in promoting traditional grazing management, as have other management agreements and conservation body ownership. Illegal and uncontrolled burning is adversely affecting heathland structures in some areas, and localised winter feeding of cattle and overgrazing has caused some losses to grassland. These problems are particularly apparent on common land. Grazing problems are being tackled by</p>

Site Name	Area (ha)	Location	Qualifying Features	Key vulnerabilities and environmental conditions to support site integrity
Exmoor Heaths SAC (cont.)			<p>Vaccinium myrtillus heath on well-drained, steeper slopes and to M17 Scirpus cespitosus – Eriophorum vaginatum blanket mire on deeper peat, where the northern species crowberry Empetrum nigrum occurs.</p> <p>4030 European dry heaths</p> <p>Exmoor is representative of upland heath in south-west England. The site is notable because it contains extensive areas of H4 Ulex gallii – Agrostis curtisii heath, a type most often found in the lowlands, and H12 Calluna vulgaris – Vaccinium myrtillus heath, a predominantly upland type, together with areas of H8 Calluna vulgaris – Ulex gallii heath. In wetter situations or on peat there can be a high frequency of purple moor-grass Molinia caerulea and cross-leaved heath Erica tetralix, which results in frequent transitions to wet heaths. The associated valley mires support the oceanic species pale butterwort Pinguicula lusitanica and ivy-leaved bellflower Wahlenbergia hederacea. The Exmoor heaths are also important as the largest stronghold for the heath fritillary butterfly Mellicta athalia, associated with sheltered slopes in the transition to woodland. The site holds a small breeding population of merlin Falco columbarius that is the most southerly in the western Palearctic.</p> <p><u>Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site</u></p> <p>1230 Vegetated sea cliffs of the Atlantic and</p>	<p>action using the environmental conditions attached to livestock subsidy schemes, as well as the ESA scheme. Incentive payments are currently seen as the only effective means of influencing burning practices. Rhododendron has spread in some areas. Natural England and Exmoor National Park Authority management agreements are being used to eliminate infestations from affected heathland.</p> <p>The SAC is popular for recreational use, attracting many walkers and dogs. Heathland habitats are vulnerable to the effects of visitors, with dwarf shrubs reduced by 50% cover with less than 200-400 passages per year. Nitrogen enrichment from dog fouling can change heath to grassland. Wet heath plants are more sensitive.</p> <p>Additional tourism would potentially result in increased visitor pressure and potential habitat damage. The site is not within close proximity to the strategic road network. However, existing acid deposition at the site is 6 times the critical load for upland heathland. It is uncertain what the sources of acid deposition are but any increase in traffic due to tourism may have an adverse effect.</p>

Site Name	Area (ha)	Location	Qualifying Features	Key vulnerabilities and environmental conditions to support site integrity
			<p>Baltic Coasts</p> <p>7130 Blanket bogs (* if active bog) * Priority feature</p> <p>7230 Alkaline fens</p> <p>91A0 Old sessile oak woods with Ilex and Blechnum in the British Isles</p>	
South Dartmoor Woods SAC	2,156.4	Approximately 1.7km to the south of Mid Devon District.	<p><u>Annex I habitats that are a primary reason for selection of this site</u></p> <p>91A0 Old sessile oak woods with Ilex and Blechnum in the British Isles</p> <p>This complex is the most southerly of the sites selected and is representative of old sessile oak woods in south-west England, with regionally important assemblages of lower plants and dry Lobarion communities that are unique in Western Europe. The woods are notable for the variations in stand type that reflect past management (old coppice and high forest) and also include grazed and ungrazed areas. The woodland is part of a complex mosaic that includes heathland and species associated with open ground, such as the high brown fritillary <i>Argynnis adippe</i> and pearl-bordered fritillary butterfly <i>Boloria euphrosyne</i>. Variations also arise due to geology, resulting in the presence of small-leaved lime <i>Tilia cordata</i>, ash <i>Fraxinus excelsior</i>, wild service tree <i>Sorbus torminalis</i>, and small areas of wet woodland dominated by alder <i>Alnus glutinosa</i> and willow <i>Salix</i> spp.</p> <p><u>Annex I habitats present as a qualifying feature, but not a primary reason for selection</u></p>	<p>South Dartmoor Woods lies within Dartmoor National Park and has a high degree of visual appeal and areas of heavy recreational pressure. Yarner Wood and Trendlebere Down and part of the Bovey Valley are managed as National Nature Reserves. The whole area has a mixture of grazed and ungrazed woodlands plus a mixture of old coppice and high forest stands. Lichens are an important component of the woodlands and some long-term decline has been taking place due to air pollution and/or climate change.</p> <p>The areas of dry heath are all common land and for the most part are subject to heavy grazing and uncontrolled fires (arson). The Dartmoor ESA scheme offers a mechanism to reduce grazing levels but the issue of grazing is legally complex. Measures to reduce the adverse effects of uncontrolled fires are being carried out by Dartmoor National Park Authority and the Dartmoor Commoners' Council in conjunction with Natural England and other statutory bodies. They include</p>

Site Name	Area (ha)	Location	Qualifying Features	Key vulnerabilities and environmental conditions to support site integrity
South Dartmoor Woods SAC (cont.)			<p><u>of this site</u></p> <p>4030 European dry heaths</p>	<p>enhanced communication through a Fire Liaison Group and the agreement of burning plans on commons.</p>
Exmoor and Quantock Oakwoods SAC	1,895.2	<p>A fragmented site lying to the north and north east of Mid Devon District. Approximately 2.8km from the District boundary at the closest point.</p>	<p><u>Annex I habitats that are a primary reason for selection of this site</u></p> <p>91A0 Old sessile oak woods with Ilex and Blechnum in the British Isles</p> <p>This site supports extensive tracts of old sessile oak woods in conjunction with heath. They are rich in bryophytes, ferns (including Dryopteris aemula) and epiphytic lichens, the latter often associated with old pollards, since parts are former wood-pasture rather than the oak coppice that is more common with this type. In the Barle Valley the woods also occur in mosaic with glades and small fields and the combination results in good populations of fritillary butterflies.</p> <p><u>Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site</u></p> <p>91E0 Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae) * Priority feature</p> <p><u>Annex II species that are a primary reason for selection of this site</u></p> <p>1308 Barbastelle Barbastella barbastellus</p> <p>A maternity colony of barbastelles Barbastella barbastellus utilises a range of tree roosts in this area of predominantly oak Quercus spp.</p>	<p>Some grazing/browsing is essential to maintain conditions suitable for lower plant assemblages, which are a key feature of the woodlands. However, many woods are grazed by sheep and/or red deer and this can prevent regeneration and change the ground flora. Cases of overgrazing may require action using environmental conditions of livestock subsidy schemes. Invasive non-native species are a problem in some woods, particularly Rhododendron and Japanese knotweed. These species are being eliminated by conservation bodies or management agreements. Beech is also a problem, as it is replacing oak in places and does not support such a diverse or specialist wildlife on Exmoor as oak.</p> <p>Dense monocultures of coppiced oak occur, of little structural or species diversity. Although minimum intervention is mostly desirable, opportunities are being taken to diversify age and species composition to restore near-natural conditions where possible.</p> <p>Wind turbine development would have a potential impact on the Barbastelle</p>

Site Name	Area (ha)	Location	Qualifying Features	Key vulnerabilities and environmental conditions to support site integrity
Exmoor and Quantock Oakwoods SAC (cont.)			<p>woodland.</p> <p><u>Annex II species present as a qualifying feature, but not a primary reason for site selection</u></p> <p>1323 Bechstein`s bat Myotis bechsteini</p> <p>1355 Otter Lutra lutra</p>	<p>bats roosting on the site.</p> <p>Additional tourism would potentially result in increased visitor pressure and potential habitat damage.</p>
Holme Moor and Clean Moor SAC	7.6	Approximately 4.5km to the north east of Mid Devon District.	<p><u>Annex I habitats that are a primary reason for selection of this site</u></p> <p>7210 Calcareous fens with Cladium mariscus and species of the Caricion davallianae * Priority feature</p> <p>This is a relatively small site but it is important as an outlier of calcareous fens in south-west England, where Cladium is a local and rare species. The site occupies an unusual ecological situation on the spring line at the foot of a scarp slope. Although not currently managed, management continued until comparatively recently and in part explains the high species-richness of this site. There are important species-rich transitions from Cladium fen to mire with black bog-rush Schoenus nigricans and blunt-flowered rush Juncus subnodulosus, as well as to fen-meadow vegetation with purple moor-grass Molinia caerulea and meadow thistle Cirsium dissectum.</p> <p>7230 Alkaline fens</p> <p>These sites are situated on the north-facing slope of the upper reaches of a small valley and are fed by a mix of acidic and base-rich</p>	<p>The fen communities here had been neglected for several decades and as a result had deteriorated a great deal through the invasion of woody species. This situation has now been entirely reversed through management agreements with Natural England. However, it is important to note that neither of the two owner/occupiers has expressed any interest in undertaking or organising essential management themselves and Natural England (previously English Nature) has had to do this directly with their permission.</p>

Site Name	Area (ha)	Location	Qualifying Features	Key vulnerabilities and environmental conditions to support site integrity
Holme Moor and Clean Moor SAC (cont.)			<p>springs. The most species-rich example of alkaline fen is on Clean Moor, where black bog-rush <i>Schoenus nigricans</i> and blunt-flowered rush <i>Juncus subnodulosus</i> have many associates including the moss <i>Scorpidium scorpioides</i>, small sedges such as <i>Carex pulicaris</i>, <i>C. panicea</i> and <i>C. viridula</i> ssp <i>brachyrrhyncha</i>, and other low growing species such as lousewort <i>Pedicularis palustris</i> and the orchids <i>Gymnadenia conopsea</i>, <i>Dactylorhiza fuchsii</i> and <i>D. praetermissa</i>. In addition to NVC type M13 <i>Schoenus nigricans</i> – <i>Juncus subnodulosus</i> mire around the base-rich seepages there is also species-poor swamp with great fen-sedge <i>Cladium mariscus</i> and hemp agrimony <i>Eupatorium cannabinum</i>, and fen meadow on Holme Moor. Holme Moor &amp; Clean Moor is important as a south-westerly site for alkaline fen.</p> <p><u>Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site</u></p> <p>6410 <i>Molinia</i> meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinion caeruleae</i>)</p>	
Dartmoor SAC	23,165.8	Approximately 5.5km to the south west of Mid Devon District.	<p><u>Annex I habitats that are a primary reason for selection of this site</u></p> <p>4010 Northern Atlantic wet heaths with <i>Erica tetralix</i></p> <p>Dartmoor is representative of upland wet heath in south-west England. M15 <i>Scirpus cespitosus</i> – <i>Erica tetralix</i> wet heath predominates and together with other mire communities and small areas of drier</p>	The ecological character of the site is, to a large extent, dependent upon long-established traditional farming methods. However, much of Dartmoor's blanket bog and wet heath has been affected by uncontrolled and unplanned fires, some of which start naturally in hot, dry summers, but most of which are started deliberately.

Site Name	Area (ha)	Location	Qualifying Features	Key vulnerabilities and environmental conditions to support site integrity
Dartmoor SAC (cont.)			<p>heathland, forms a distinctive mosaic of vegetation types not fully represented elsewhere. Smaller amounts of M16 Erica tetralix – Sphagnum compactum wet heath occur. Additionally, there are transitions to areas of M21 Narthecium ossifragum – Sphagnum papillosum valley mire.</p> <p>4030 European dry heaths</p> <p>Dartmoor is representative of upland heath in south-west England. The site is notable because it contains extensive areas of H4 Ulex gallii – Agrostis curtisii heath, a type most often found in the lowlands, and H12 Calluna vulgaris – Vaccinium myrtillus heath, a predominantly upland type. Calluna – Vaccinium heath generally occupies the steeper, better-drained slopes, with Ulex – Agrostis heath occurring on the lower slopes of the moor. A number of predominantly northern species occur on the southern edge of their national range. Plants found on dry heaths that are rare in south-west England include crowberry Empetrum nigrum and stag’s-horn clubmoss Lycopodium clavatum.</p> <p>7130 Blanket bogs (* if active bog) * Priority feature</p> <p>Dartmoor is the southernmost blanket bog in Europe and is representative of blanket bogs in south-west England. The main vegetation community is M17 Scirpus cespitosus – Eriophorum vaginatum blanket mire. Many of the bogs are dominated by purple moor-grass Molinia caerulea and micro-topography is poorly developed. There are also widespread</p>	<p>A programme of alerting the public to the dangers of starting accidental fires is already undertaken by the National Park Authority. In addition, a Moorland Management Group is to be established so that farmers and conservationists can share knowledge on moorland management and reduce the potential for damage by fires.</p> <p>One of the key nature conservation objectives for Dartmoor is to reverse the degradation of blanket bog and wet heath by providing stable conditions that favour bog vegetation. This objective is being pursued by the production of burning plans in collaboration with the Commoners' Council, Commons Associations and the National Park Authority, and by promoting the Environmentally Sensitive Area programme. Dartmoor is used for military training and artillery and mortar fire has led to the formation of numerous craters, and gully erosion in some areas. However, the use of heavy munitions has ceased since 1998 and the craters are healing naturally.</p> <p>Dry heath on Dartmoor has suffered extensive damage through overgrazing and frequent burning. Consequently, some areas of former dry heath have been converted to grass moorland, and large areas are in unfavourable condition because of low dwarf-shrub</p>

Site Name	Area (ha)	Location	Qualifying Features	Key vulnerabilities and environmental conditions to support site integrity
Dartmoor SAC (cont.)			<p>peat-cuttings, dug by hand in the 19th Century, but these have revegetated and many once again support a healthy cover of Sphagnum bog-mosses. Nevertheless, good areas are frequently encountered that are very wet, support frequent and widespread Sphagnum mosses of a range of species, and display small-scale surface patterning. Of particular note is the rare Sphagnum imbricatum, which occurs at two localities.</p> <p>91A0 Old sessile oak woods with Ilex and Blechnum in the British Isles</p> <p>Three main areas of oak woodland are included within this site. Wistman's Wood is notable as a high-altitude relict surviving on a granite clitter slope. Unusually for old oak woods in the UK, it is dominated by pedunculate oak <i>Quercus robur</i> rather than sessile oak <i>Q. petraea</i>. The epiphytic and ground-covering bryophyte flora, with filmy ferns, is species-rich, although there are some indications that some species may have declined in recent years, possibly because as the tree canopy has grown conditions below it have become less humid. Wistman's Wood has a well-documented record of changes over the last century.</p> <p>Dendles Wood is dominated by pedunculate oak <i>Q. robur</i>, but with substantial areas of beech <i>Fagus sylvatica</i> on the lower slopes (considered to be a possible outlier of the native range of beech). The ground flora is a mixture of grasses, bracken <i>Pteridium aquilinum</i>, bluebell <i>Hyacinthoides non-scripta</i>,</p>	<p>cover. Through the implementation of Environmental Cross-Compliance and by promoting the Environmentally Sensitive Area programme, the condition of dry heath should improve.</p> <p>Wistman's Wood and Black Tor Copse are not fenced to exclude livestock. The low-intensity grazing provides ideal conditions for rich moss and lichen floras. Livestock are excluded from Dendles Wood however.</p>

Site Name	Area (ha)	Location	Qualifying Features	Key vulnerabilities and environmental conditions to support site integrity
Dartmoor SAC (cont.)			<p>with locally many boulders supporting a species-rich bryophyte mat. There is a luxuriant epiphytic lichen flora including several rare species. Although selected for its oakwood community, the beechwood is a fragmentary outlier of Ilicio-Fagion.</p> <p>Black Tor Copse has similarities to Wistman's Wood, consisting of stunted trees developed on granite clitter. The vascular plant species-richness is limited, with much bilberry <i>Vaccinium myrtillus</i>, hard-fern <i>Blechnum spicant</i> and ivy <i>Hedera helix</i>, but the bryophyte and lichen assemblages are very rich including nationally-rare species and others seldom found outside the uplands of Scotland and Wales.</p> <p><u>Annex II species that are a primary reason for selection of this site</u></p> <p>1044 Southern damselfly <i>Coenagrion mercuriale</i></p> <p>A valley mire at 280 m altitude supports a southern damselfly <i>Coenagrion mercuriale</i> population of 20–100 individuals, first discovered on the site in 1998. The stronger population occurs in the northern portion of the mire, where springs feed shallow soakways that flow through wet heath. The southern part of the mire has a higher water table with <i>Sphagnum</i> bog-mosses dominating.</p> <p><u>Annex II species present as a qualifying feature, but not a primary reason for site selection</u></p>	

Site Name	Area (ha)	Location	Qualifying Features	Key vulnerabilities and environmental conditions to support site integrity
Dartmoor SAC (cont.)			1106 Atlantic salmon <i>Salmo salar</i> 1355 Otter <i>Lutra lutra</i>	
Exe Estuary SPA	2,345.6	Approximately 8km to the south of Mid Devon District.	<p><u>ARTICLE 4.1 QUALIFICATION (79/409/EEC)</u> Over winter the area regularly supports: <i>Podiceps auritus</i> (North-western Europe) - 5% of the GB population <i>Recurvirostra avosetta</i> (Western Europe/Western Mediterranean - breeding) - 28.3% of the GB population</p> <p><u>ARTICLE 4.2 QUALIFICATION (79/409/EEC)</u> Over winter the area regularly supports: <i>Branta bernicla bernicla</i> (Western Siberia/Western Europe) - 0.6% of the population <i>Calidris alpina alpina</i> (Northern Siberia/Europe/Western Africa) - 1.1% of the population in Great Britain <i>Haematopus ostralegus</i> (Europe &amp; Northern/Western Africa) - 1.2% of the population in Great Britain <i>Limosa limosa islandica</i> (Iceland - breeding) - 7.2% of the population in Great Britain <i>Pluvialis squatarola</i> (Eastern Atlantic - wintering) - 1.1% of the population in Great Britain</p> <p><u>ARTICLE 4.2 QUALIFICATION (79/409/EEC): AN INTERNATIONALLY IMPORTANT</u></p>	The Exe comprises a variety of habitats which together provide one of the most important sites for wintering and passage waterfowl in the south-west. The area is subject to a variety of recreational uses which has potential for disturbance to waterfowl. Dredging takes place in the approach channel which could have an adverse effect on the Dawlish Warren Sandspit and sediment movement patterns. The Exe Estuary Management Plan addresses the recreational, disturbance and potential oil spill issues whilst dredging operations and mussel bed proposals are subject to the provisions of the Habitats Regulations which require assessment of any plans or projects which may affect the site. A Regulatory Order is proposed which would make further mariculture projects licenceable and Natural England would then be fully consulted. Substantial areas are managed as nature reserves by the RSPB, local wildlife Trust and local authorities.

Site Name	Area (ha)	Location	Qualifying Features	Key vulnerabilities and environmental conditions to support site integrity
Exe Estuary SPA (cont.)			<p><u>ASSEMBLAGE OF BIRDS</u></p> <p>Over winter the area regularly supports: 23811 waterfowl including:</p> <p>Podiceps auritus , Branta bernicla bernicla , Haematopus ostralegus , Recurvirostra avosetta , Pluvialis squatarola , Calidris alpina alpina , Limosa limosa islandica.</p>	
Exe Estuary Ramsar Site	2,366.8	Approximately 8km to the south of Mid Devon District.	<p><u>Ramsar criterion 5 - Assemblages of international importance: Species with peak counts in winter:</u></p> <p>20263 waterfowl (5 year peak mean 1998/99-2002/2003)</p> <p><u>Ramsar criterion 6 – Species/populations occurring at levels of international importance</u></p> <p>Qualifying Species/populations (as identified at designation):</p> <p>Species with peak counts in winter:</p> <p>Dark-bellied brent goose, Branta bernicla bernicla (1509 individuals, representing an average of 1.5% of the GB population)</p> <p>Species/populations identified subsequent to designation for possible future consideration under criterion 6.</p> <p>Species with peak counts in winter:</p> <p>Black-tailed godwit , Limosa limosa islandica, (Iceland/W Europe, 857 individuals, representing an average of 2.4% of the population)</p>	<p>The site encompasses the waters, foreshore, low-lying land, three marshes and an unusual double spit across the mouth of the estuary and sand dunes of Dawlish Warren. This complex of habitats supports internationally important numbers of wintering and passage waterfowl, as well as populations of breeding birds and nationally important rare plants and invertebrates.</p> <p>The site is used for recreation, including walking, bird watching, angling, sailing and other water-based activities.</p>

Site Name	Area (ha)	Location	Qualifying Features	Key vulnerabilities and environmental conditions to support site integrity
Exe Estuary Ramsar Site (cont.)				
East Devon Pebblebed Heaths SAC	1,119.9	Approximately 9.5km to the south of Mid Devon District.	<p><u>Annex I habitats that are a primary reason for selection of this site</u></p> <p>4010 Northern Atlantic wet heaths with Erica tetralix</p> <p>This is the largest block of lowland heathland in Devon and is associated with various other mire communities. The wet element occupies the lower-lying areas and includes good examples of M16 Erica tetralix – Sphagnum compactum wet heath. Among the 21 breeding dragonfly species is the Annex II species 1044 Southern damselfly Coenagrion mercuriale. There is also an important assemblage of birds, including European nightjar Caprimulgus europaeus, Eurasian hobby Falco subbuteo and Dartford warbler Sylvia undata.</p> <p>4030 European dry heaths</p> <p>The East Devon Pebblebed Heaths in south-west England include extensive areas of lowland European dry heaths. This site has representative examples of H4 Ulex gallii – Agrostis curtisii heath, characterised by the presence of heather Calluna vulgaris, bell heather Erica cinerea, western gorse Ulex gallii, bristle bent Agrostis curtisii, purple moor-grass Molinia caerulea, cross-leaved heath E. tetralix and tormentil Potentilla erecta. The presence of plants such as cross-</p>	<p>The East Devon Pebblebed Heaths is the largest block of lowland heath in Devon. The majority of the site is under positive conservation management. However, parts are vulnerable to changes in agricultural management and quarrying occurring in the immediate vicinity. These may have an adverse impact on the water chemistry and on water levels and may result in changes to the vegetation characteristics of the site.</p> <p>Water abstraction from local groundwater sources is another potential problem that could have adverse consequences for the hydrology of the site. Mineral permissions and water abstraction licences will be reviewed under the relevant review provisions of the Habitats Regulations.</p>

Site Name	Area (ha)	Location	Qualifying Features	Key vulnerabilities and environmental conditions to support site integrity
East Devon Pebblebed Heaths SAC (cont.)			<p>leaved heath illustrates the more oceanic nature of these heathlands, as this species is typical of wet heath in the more continental parts of the UK.</p> <p><u>Annex II species that are a primary reason for selection of this site</u></p> <p>1044 Southern damselfly <i>Coenagrion mercuriale</i></p> <p>This site holds two relatively small populations representing southern damselfly <i>Coenagrion mercuriale</i> in the south-west of its range in England. These populations occur in wet flushes within the site.</p>	
East Devon Heaths SPA	1,119.9	Approximately 9.5km to the south of Mid Devon District.	<p><u>ARTICLE 4.1 QUALIFICATION (79/409/EEC)</u></p> <p>During the breeding season the area regularly supports:</p> <p><i>Caprimulgus europaeus</i> (2.4% of the GB breeding population)</p> <p><i>Sylvia undata</i> (8% of the GB breeding population)</p>	<p>The East Devon Pebblebed Heaths comprises approximately 1,110 hectares of lowland heath in South West England. This is the largest block of lowland heath in Devon and is an internationally important representative of the inland Atlantic-climate lowland heaths of Britain and North West Europe.</p> <p>The majority of the site is under positive conservation management. However, parts of the site are under threat because of changes in agricultural management, water abstraction and quarrying occurring in the immediate vicinity which may have an adverse impact on the water chemistry or result in major changes to the vegetation and/or affect the ability of the site to provide food supplies on</p>

Site Name	Area (ha)	Location	Qualifying Features	Key vulnerabilities and environmental conditions to support site integrity
East Devon Heaths SPA (cont.)				<p>which the birds depend. The effects of these activities will largely be mitigated by the review of mineral permissions and water abstraction licenses under the relevant provisions of the Habitat Regulations.</p>

## **Appendix 2**

### Plans, Policies and Programmes with the Potential for In-Combination Effects

## Local Plans and Strategies

### West Somerset Local Plan to 2032 (Revised Draft Preferred Strategy)

West Somerset lies to the north of Mid Devon District.

#### Housing:

New Policies SC2/A: Housing Provision states that during the period to 2032 the Plan will deliver approximately 2,900 dwellings in the Local Plan Area. A minimum of 1,450 will be provided on allocated key strategic sites at Minehead/Alcombe, Watchet and Williton. New housing within the Local Plan Area will be delivered at an average annualised rate of 145 dwellings per year. These will be distributed as below, with strategic sites providing:

- An average of 38 dwellings per year at Minehead/Alcombe
- An average of 15 dwellings per year at Watchet
- An average of 21 dwellings per year at Williton

In addition to the key strategic sites provision will be made for

- An average of 43 dwellings per year through other development at Minehead/Alcombe, Watchet and Williton
- An average of 30 dwellings per year will be provided at the primary and secondary villages

#### Employment Land Provision:

Policy EC2: Major development sites at Mart Road, Minehead and Roughmoor were identified, within which there will be a general presumption on favour of uses in the B1, B2 and B8 use classes. Employment and service based land uses falling outside these classes will be permitted where it can be demonstrated that this will result in a positive contribution to the overall vitality and viability of the local economy.

#### HRA Findings

The HRA Report for the West Somerset Local Plan: Draft Preferred Strategy (January 2012) concluded that, provided a number of specific measures were incorporated into the final Local Plan, the Plan would be unlikely to have a significant effect on any European sites. These additions (including the addition of policies relating to a bat consultation zone and a wetland birds consultation zone) appear to have been incorporated into the Revised Draft Referred Strategy. **Therefore, in-combination effects with the Mid Devon Local Plan Review are not expected.**

### North Devon and Torridge Publication Draft Local Plan (June 2014)

North Devon and Torridge lie to the north/north-west of Mid Devon District.

#### Housing and employment land provision:

Policy ST08: 16,469 houses and 110ha of employment will be provided in northern Devon between 2011 and 2031. This development will be distributed as follows:

- Barnstaple: 4,885 dwellings and 26.2ha of employment land
- Bideford: 4,161 dwellings and 30ha of employment land
- Braunton/Wrafton: 382 dwellings and 10ha of employment land
- Fremington/Yelland: 426 dwellings and 7ha of employment land
- Great Torrington: 499 dwellings and 4ha of employment land
- Holsworthy: 640 dwellings and 9.5ha of employment land
- Ilfracombe: 1,426 dwellings and 5ha of employment land
- Northam: 1,782 dwellings and no employment land
- South Molton: 1,208 dwellings and 17.5ha of employment land
- Local centres: 952 dwellings and 0.9ha of employment land
- Villages: 912 dwellings and 0.3ha of employment land
- Rural settlements and countryside: 196 dwellings and no employment land

#### HRA Findings

The HRA Report for the Publication Draft Local Plan (June 2014) identified a number of potential significant

effects on European sites that may occur; however recommendations for mitigation were incorporated into the Plan and in light of those amendments, the HRA report concluded that the Local Plan is acceptable in terms of its impacts on European sites. However, Natural England's consultation response to the draft version of this HRA report for Mid Devon's Local Plan raised specific concerns regarding the potential for in-combination effects with the North Devon and Torridge Local Plan as, although the HRA report for the North Devon and Torridge Local Plan concluded that it would have no adverse effects on the integrity of European sites (including effects on the Culm Grasslands SAC as a result of increased air pollution), this conclusion had not yet been accepted by Natural England and mitigation or compensatory arrangements had not yet been agreed. Since that consultation response was received from Natural England, North Devon and Torridge District Councils have commissioned an air quality assessment to examine the potential for its Local Plan to have likely significant effects on the integrity of the Culm Grasslands SAC as a result of increased air pollution. The report concluded that there would be no likely significant effects, and this conclusion has been accepted by Natural England<sup>22</sup>. **Therefore, in-combination effects with the Mid Devon Local Plan are not considered likely.**

### **West Devon Adopted Core Strategy (2006-2026)**

West Devon lies to the west of the area of Mid Devon. A new Local Plan is being prepared to replace the adopted Core Strategy, and an initial consultation is expected to be undertaken in 2014.

#### **Housing:**

The scale of housing development for West Devon has been based on the original requirements set out in the South West Regional Spatial Strategy (now revoked), which was to provide at least 4400 dwellings in the Borough for the period 2006-2026.

Most of the proposed future housing development is in the form of relatively large extensions to Okehampton and Tavistock. Strategic Policy 7 outlines that new housing will be delivered at an average rate of 220 per year over the period to 2026. The following shows the approximate levels of housing to be delivered:

- Okehampton: 163 new dwellings on average per year
- Tavistock: 88 new dwellings on average per year
- Local Centres and Villages: 58 new dwellings on average per year

#### **Employment Land Provision:**

It is estimated that there is currently about 19 hectares of employment land available in West Devon, significantly less than is expected to be needed for the period to 2026. Focus is likely to be given to areas with reasonable access to the national road network. West Devon has only limited opportunities with Okehampton, and to a lesser extent Tavistock, being the readily identifiable locations.

#### **HRA Findings:**

No HRA work appears to be available for the 2006 adopted Core Strategy; therefore **it is not currently possible to determine the likelihood of in-combination effects with the Mid Devon Local Plan.**

### **Adopted Teignbridge Local Plan 2013-2033 (May 2014)**

Teignbridge is located to the south of Mid Devon.

#### **Housing:**

Policy S4 specifies that by 2016, 640 new dwellings will be being built per year in the Local Plan area. This rate will be maintained until 2033, giving an average of 620 new dwellings per year over the Local Plan period.

The approximate distribution of dwellings between towns including allocations and commitments should be:

- Heart of Teignbridge (Kingskerswell, Kingsteignton, Newton Abbot) about 50%
- South West Exeter about 15%
- Dawlish about 10%
- Teignmouth about 5%
- Bovey Tracey about 5%

<sup>22</sup> Letter from Natural England to North Devon District Council, 2<sup>nd</sup> March 2015.

- Chudleigh about 5%

### **Employment Land Provision:**

Policy S3 outlines that the Teignbridge Local Plan will:

- Allocate sufficient land for the development of about 3 hectares of business, industrial and warehousing sites per year;
- promote a range of scales and types of economic development land; and
- ensure a deliverable supply of 15 hectares of land for business, industrial and warehousing uses at any one time.

The approximate distribution of employment development between the towns during the 2013-2033 period is estimated as being:

- Heart of Teignbridge (Kingskerswell, Kingsteignton, Newton Abbot) 60%+
- South West Exeter 5%+
- Dawlish 3%+
- Bovey Tracey 3%+
- Chudleigh 3%+

### **HRA Findings:**

The HRA report for the Proposed Submission version of the Local Plan (June 2013) concluded that in the absence of mitigation measures, adverse effects on European sites cannot be ruled out. However, the report made a number of specific recommendations for mitigation and these appear to have been incorporated into the Submitted Local Plan. In light of those amendments, it is concluded that significant effects from the Local Plan are not likely and **therefore in-combination effects with the Mid Devon Local Plan are also not considered likely.**

## **East Devon Local Plan 2006 – 2026 (Proposed Submission Publication, November 2012)**

East Devon is situated to the south-east of Mid Devon.

### **Housing:**

Strategy 1 outlines that planning provision will be made in the Local Plan Area for approximately 15,000 new dwellings in the 2006 to 2026 period. East Devon's West End will accommodate around 50% of these new homes, with the planned pattern for residential development as follows:

- Phase 1 – 2011/12 to 2015/16 – 1,933 (387 per year on average)
- Phase 2 – 2016/17 to 2020/21 – 2,533 (507 per year on average)
- Phase 2 – 2021/22 to 2025/26 – 2,981 (596 per year on average)

The seven main towns of East Devon will also form the focal points for development, with around 40% of the new homes being located within them. Villages and rural areas will see lower levels of growth as development will primarily be focused on meeting local needs. Approximately 10% of new homes will be built in these areas.

Appendix 3 of the Local Plan provides fuller details on the scale and distribution of the proposed housing development.

### **Employment Land Provision:**

Strategy 1 specifies that development for employment purposes will take place on around 150 hectares of land in the Local Plan Area. Of this 122 hectares will come forward through strategic allocations.

15 hectares of employment land in the West End which will be allocated in addition to sites with planning permission that already exist for development of the following proposals:

- Land at Cranbrook - 5 hectares already committed
- Land at Science Park - 25 hectares already committed
- Land at Skypark - 40 hectares already committed

### **HRA Findings:**

The HRA Screening Report for the Core Strategy (now referred to as the Local Plan) in August 2010 concluded

that significant effects on European sites could not be ruled out in relation to a number of the options for the Plan that were set out at that stage, and that Appropriate Assessment would be required in order to consider these in more detail. No more recent HRA work appears to be available for the 2006-2026 Proposed Submission Publication Local Plan; therefore **it is not currently possible to determine the likelihood of in-combination effects with the Mid Devon Local Plan.**

### **Taunton Deane (Adopted Core Strategy 2011-2028)**

Taunton Deane is located to the east of Mid Devon.

#### **Housing:**

Policy CP 4 outlines that provision will be made by Taunton Deane Council for the delivery of at least 17,000 new dwellings during the 2008 – 2028 period. The Taunton Urban Area will act as the primary focus for this new housing, and spatial distribution will be consistent with the settlement hierarchy established in Policy SP1.

Development will be phased broadly as follows:

- 1 April 2011 - 31 March 2016: at least 3,500 new dwellings
- 1 April 2016 - 31 March 2021: at least 4,500 new dwellings
- 1 April 2021 - 31 March 2028: at least 7,500 new dwellings

#### **Employment Land Provision:**

Policy CP 2 states that in order to meet the economic forecast for the growth of around 11,900 net additional jobs in Taunton Deane provision will be made for:

- Around 36.5 hectares of land for Class B1 b.c., B2, B8 and Sui Generis uses, focused within the Taunton urban area with complementary provision at Wellington;
- around 49,500 square metres of additional Class B1a. office space, focused on Taunton town centre;
- around 93,150 sq.m. of additional retail floorspace focused on Taunton town centre, with complementary provision at Monkton Heathfield and Wellington.

#### **HRA Findings:**

The HRA report for the Taunton Deane Core Strategy (May 2011) concluded that, provided a number of specific mitigation measures were incorporated into the final version of the Core Strategy, significant effects on European sites were not considered likely. Those amendments appear to have been incorporated into the final version of the Plan; **therefore in-combination effects with the Mid Devon Local Plan are also not considered likely.**

### **Taunton Deane Site Allocations and Development Management Plan Preferred Options (Consultation ended December 2013)**

The Site Allocations and Development Management Plan (SADMP) sets out policies for the management of development in Taunton Deane, and will also steer the delivery of the 17,000 new dwellings identified in the adopted Core Strategy. Site options for residential and employment development are put forward for Taunton, Wellington and major and minor rural centres. The SADMP acknowledges that given the limited availability of brownfield sites to accommodate future development, the majority of development at Taunton will occur on greenfield sites, beyond Taunton's existing settlement limits.

#### **HRA Findings:**

Habitats Regulations Assessment for the emerging Site Allocations and Development Management Plan does not yet appear to have been undertaken; therefore **it is not yet possible to draw any conclusions about the potential for in-combination effects with the Mid Devon Local Plan.**

### **Exmoor National Park Draft Local Plan (Consultation ended December 2013)**

Exmoor National Park covers a loosely defined area of land in West Somerset and North Devon, lying roughly to the north of Mid Devon.

#### **Housing:**

Policy HC-S1 states that the purpose of housing development will be to address the housing needs of local

communities. Provision will not be made for housing solely to meet open market demand. Housing land will not be allocated in the development plan. Policy HC-S1 aims to ensure, in terms of its size, type and tenure that the mix of all housing permitted in the National Park contributes to that which is needed by Exmoor's communities.

#### **Employment Land Provision:**

In accordance with the spatial strategy set out in GP4, new employment sites and buildings will be focused in existing settlements and be of a type, scale and design appropriate to the local and National Park context (SE-S2). In the open countryside, Policy SE-S3 provides opportunities for employment development through the extension of existing employment sites or buildings and the reuse of existing buildings.

#### **HRA Findings:**

The HRA report for the Draft Local Plan (October 2013) concluded that, provided a number of specific mitigation measures are incorporated into the final Local Plan, it is unlikely to have a significant effect on the conservation objectives of European sites. Therefore, **in-combination effects with the Mid Devon Local Plan are also not considered likely at this stage although it will be necessary to review the next iteration of Exmoor's Local Plan to ensure that the recommendations are addressed.**

### **Dartmoor National Park Adopted Core Strategy (2008)**

Dartmoor National Park covers land in West Devon, Teignbridge and South Hams, in addition to the south western tip of Mid Devon District.

#### **Housing:**

Policy COR15 states that the Authority will work with the local housing authorities to provide for the housing needs of communities within the Dartmoor National Park, with a strong priority for the provision of affordable housing to meet identified local needs. The Core Strategy (informed by the now revoked Regional Spatial Strategy) identifies a need to deliver 50 dwellings per year in the National Park during the plan period. This housing will be delivered in the Local Centres, which are: Ashburton, Buckfastleigh, Chagford, Horrabridge, Moretonhampstead, Princetown, South Brent, and Yelverton. Small scale developments serving identified needs will be acceptable in principle within smaller settlements defined as Rural Settlements.

#### **Employment Land Provision:**

The Core Strategy seeks to assist in the provision of local employment and business opportunities, particularly in the Local Centres, and in the diversification of the rural economy in ways that are beneficial to the National Park and its community. This focuses on small scale developments, and no specific sites are allocated in the Core Strategy.

#### **HRA Findings:**

The HRA Report for the Core Strategy (2008) concluded that, in light of the mitigation measures already in place, the Core Strategy would not have significant effects on any European sites. Therefore, **in-combination effects with the Mid Devon Local Plan are also not considered likely.**

### **Dartmoor National Park Adopted Development Management and Delivery Development Plan Document (2013)**

The Development Management and Delivery Development Plan (DMDDP) provides more detail in relation to the delivery of housing in the National Park. Within the Local Centres, new dwellings will be permitted, with preference given to sites on previously developed land or buildings. All developments will need to deliver 50% affordable housing. Within Rural Settlements, all new housing will need to be affordable and located on small infill plots within an existing built frontage and within the settlement or provided through the acceptable conversion of an existing building.

There are no specific proposals for the Rural Settlement of Cheriton Bishop/Cheriton Cross (which lies within Mid Devon District, but falls under the control of Dartmoor National Park as the local planning authority).

#### **HRA Findings:**

The HRA Report for the Development Management and Delivery DPD (2013) concluded that, in light of the mitigation measures already in place, the DPD would not have significant effects on any European sites. Therefore, **in-combination effects with the Mid Devon Local Plan are also not considered likely.**

## Exeter City Council Adopted Core Strategy (2012)

Although not adjacent to Mid Devon, Exeter is very near to the southern boundary of Mid Devon, and is approximately 18km south of Tiverton.

### Housing:

Core Policy CP1 of the Core Strategy targets the delivery of 12,000 dwellings in the city between 2006 and 2026. This includes the allocation of three urban extensions, two to the east of Exeter (4,800 dwellings), and one to the southwest (500 dwellings). The proposals were based on approximately 4,900 dwellings that were completed or had planning permission at the time the Core Strategy was published.

### Employment Land Provision:

CP1 also targets the delivery of 60ha of employment land, 21ha of which will be delivered in the urban extensions to the east of Exeter, and 15ha of which will be delivered in the urban extension to the southwest. In addition, 5.5ha of employment land is proposed at Pinhoe to the east of the city. The proposals were based on approximately 20ha of employment land that was completed or had planning permission at the time the Core Strategy was published.

Further details on the strategic allocations to the east and southwest of the city are provided in Core Policy CP19.

### HRA Findings:

The HRA Report for the Core Strategy (2010) concluded that the Core Strategy will not have a significant negative effect on any European sites provided that all of the recommended measures set out in the HRA report are implemented. Those measures appear to have been incorporated into the final version of the Core Strategy; therefore **in-combination effects with the Mid Devon Local Plan are not considered likely.**

## Exeter City Council Draft Development Delivery DPD (2013)

The Development Delivery Plan (DDP) provides more detail in relation to the delivery of housing and employment sites in the city that is not delivered through the strategic allocations outlined within the Core Strategy (see policy CP19).

Draft Policy DD2 allocates two sites that together will deliver 20ha of employment land, at Exeter Business Park and south of the A379., Newcourt. Draft Policy DD7 allocates 2 regeneration areas that will deliver 939 dwellings, at Grecian Quarter and Water Lane Area. Draft Policy DD8 allocates 18 housing sites that will deliver 10 dwellings or more (1,083 dwellings in total).

### HRA Findings:

Habitats Regulations Assessment for the emerging Development Delivery DPD does not yet appear to have been undertaken; therefore **it is not yet possible to draw any conclusions about the potential for in-combination effects with the Mid Devon Local Plan.**

## The Devon Waste Plan (Tracked Changes Version Incorporating Proposed Main and Additional Modifications, August 2014)

Once adopted the Devon Waste Plan will provide the planning policy framework for waste management in Devon (excluding Plymouth, Torbay and the National Parks of Dartmoor and Exmoor) for the period to 2031. The Plan provides a vision and objectives, together with core policies for the delivery of waste management capacity and development management policies addressing the potential impacts of development.

### HRA Findings:

The Habitats Regulations Assessment Draft Final Report (November 2013) screened all policies in the emerging Plan for their likely significant effects on European sites. No likely significant effects were identified for any of the objectives or core policies in the Plan. The potential locations for energy recovery facilities were also screened separately for their likely effects and in all cases it was concluded that there was no reason to exclude the site options from the Plan. **Therefore in-combination effects with the Mid Devon Local Plan are not considered likely.**

## Devon Minerals Plan 2011-2031 Options Consultation (2011)

Devon County Council is preparing the Devon Minerals Plan in order to replace the existing Minerals Local Plan. It will contain the Council's vision and objectives for minerals planning and provide the policy framework and site proposals to maintain the supply of minerals and limit the impacts of their working. The latest version, the Options consultation (2011) set out a vision and six strategic objectives and options for the overarching spatial strategy and other policies for inclusion in the Plan. These options included options for sand and gravel in eastern Devon, ball clay and aggregates in the Newton Abbot area and tungsten and china clay in south Devon.

### HRA Findings:

The HRA Screening Report for the Options consultation paper (January 2012) screened the options and did not identify any options that were considered likely to have a significant effect on European sites, either alone or in combination with other plans and strategies. However, a number of the options were found to have potential effects but it was considered that the effects will be more appropriate for lower tier assessments, e.g. the assessment of specific minerals sites. For those options, European sites that could be affected included Dartmoor SAC, Culm Grassland SAC, East Devon Pebblebeds SAC/East Devon SPA, South Hams SAC, South Dartmoor Woods SAC, Plymouth Sounds & Estuaries SAC, Prawle Point to Plymouth Sound cSAC. Such effects would need to be subject to HRA at a lower tier of plan-making. **Therefore in-combination effects with the Mid Devon Local Plan cannot be ruled out and will need to be considered in relation to these lower tier plans and associated HRA work.**

## Devon and Torbay Local Transport Plan 3 2011-2026

The Devon and Torbay Local Transport Plan 3 is a 15 year plan aiming to deliver a transport system that can meet economic, environmental and social challenges. Proposals set out in the Plan include lobbying for improved rail services including:

- Delivery of the intermodal freight terminal at Cranbrook.
- Delivery of the South Devon Link Road in partnership with the Department for Transport.
- Support improved road connections to Cornwall and safety improvements to the A30.
- Support modest enhancements to A303.
- Devon Metro project at Exeter.

### HRA Findings:

The Appropriate Assessment Report for the LTP3 (April 2011), provided the identified mitigation measures are implemented in full, it will be possible to conclude that the integrity of Natura 2000 sites would be maintained and the conservation objectives would be sustained across the County. **Therefore in-combination effects with the Mid Devon Local Plan are not considered likely.**

## Somerset Future Transport Plan 2011-2026 (Somerset County Council)

Somerset's Future Transport Plan sets out the long term strategy for transport in Somerset. The Schedule of Policies sets out the specific proposals, which include maintaining bus and community transport services, encouraging higher levels of sustainable transport use including walking, cycling and train travel, improving the most congested road junctions and improving parking facilities. Specific future actions in the Implementation Plan include:

- Work with other authorities particularly in the South West, to deliver improvements on major road and rail infrastructure.
- Work with the Highways Agency to deliver a workable solution to improving the A303.
- Liaise with government organisations such as Network Rail to ensure the Council can push for future improvements to the rail network in Somerset.
- Continue to push for improvements to rail in the region within the context of a delayed franchise of the Great Western Railway line.

### HRA Findings:

The HRA Report for the Somerset Future Transport Plan (October 2010) screened the policies contained in the Plan and make a number of recommendations for policy amendments and/or additions to ensure compliance with the Habitat Regulations before submission. □In light of those amendments, it could be concluded that the Plan would have no significant effects on European sites. Those amendments appear to have been incorporated into the final version of the Plan; **therefore in-combination effects with the Mid Devon Local Plan are not considered likely.**

**Appendix 3**

HRA Screening of the Local Plan Review Publication  
Draft (January 2015)

Policy/site allocation	Likely activities (operations) to result as a consequence of the policy/site allocation	Likely effects if policy/site allocation is implemented	European site(s) potentially affected	Potential mitigation measures – if implemented could help to avoid likely significant effect	Could the policy/site allocation have likely significant effects on European sites (taking mitigation into account)?
<b>Strategic Policies</b>					
Vision and Spatial Strategy	N/A	N/A	N/A	N/A	No – the Vision and Spatial Strategy will not lead directly to development, but would be delivered through other more specific policies and site allocations which have been considered separately below for their likely effects on European sites.
Policy S1: Presumption in favour of sustainable development	N/A	N/A	N/A	N/A	No – this policy would not lead to development; rather it aims to ensure that development in Mid Devon is undertaken in a sustainable way.
Policy S2: Sustainable development priorities	N/A	N/A	N/A	N/A	No – while this policy refers to the development of housing, employment land and infrastructure, such development would be delivered through other more specific policies. The overarching purpose of this policy is to ensure that such development is delivered in a sustainable way, and it includes specific reference to the need to conserve and enhance the natural environment including European designated wildlife sites.

Policy/site allocation	Likely activities (operations) to result as a consequence of the policy/site allocation	Likely effects if policy/site allocation is implemented	European site(s) potentially affected	Potential mitigation measures – if implemented could help to avoid likely significant effect	Could the policy/site allocation have likely significant effects on European sites (taking mitigation into account)?
Policy S3: Amount and distribution of development	<p>Residential development (7,100 new homes) to be focussed mainly at Tiverton, Cullompton and Crediton</p> <p>Employment development (154,000m<sup>2</sup> commercial floor space)</p> <p>Increased recreation pressure</p> <p>Increased vehicle traffic</p>	<p>Uncertain but may include:</p> <p>Loss of/damage to offsite habitat</p> <p>Non-physical disturbance such as noise/vibration and light pollution</p> <p>Erosion/trampling</p> <p>Air pollution</p>	<p>Potentially any European sites within Mid Devon (+10km) could be affected by increased visitor pressure.</p> <p>Air pollution could affect the Culm Grasslands SAC, Exe Estuary SPA and Exe Estuary Ramsar site.</p> <p>Noise, vibration and light pollution effects, as well as effects relating to the loss of offsite habitat, could only affect the Culm Grasslands SAC due to the distance of other European sites from the District boundary.</p> <p>Most development will be focussed at Tiverton, Cullompton and Crediton – the closest European site to Tiverton is the Culm Grasslands SAC approximately 10km to the north, while Cullompton and Crediton are closest to</p>	<p>Policy S2: Sustainable Development Priorities aims to ensure that new development conserves and enhances the natural environment, including biodiversity. It also aims to reduce the need to travel by car and avoid unacceptable levels of water, air and noise pollution.</p> <p>Policy S6: Public Open Space requires new development to incorporate open space, which may help to mitigate the potential increased pressure on European sites for recreation that could result from development in Mid Devon District.</p> <p>Policy S10: Environment makes specific reference to the protection and enhancement of designated biodiversity sites.</p>	<p>Uncertain – while the Local Plan Review includes a number of policies which should help to mitigate the potential impacts of new housing and employment development, this policy proposes large-scale development throughout the Plan period which could combine to increase visitor pressure at European sites and result in more vehicle traffic and the associated air pollution. While non-physical disturbance from development (e.g. noise, vibration and light pollution) would not be expected as a result of development at the towns due to their distance from European sites, the development proposed in rural areas could result in such effects if it takes place very near to the north western edge of the District where the Culm Grasslands SAC. Development in that location could also result in the loss of or damage to offsite habitat that may be used by the qualifying species of the Culm Grasslands.</p> <p>Until the nature of likely significant effects on the integrity of the European sites have been examined in more detail, it is not possible to rule out the possibility</p>

Policy/site allocation	Likely activities (operations) to result as a consequence of the policy/site allocation	Likely effects if policy/site allocation is implemented	European site(s) potentially affected	Potential mitigation measures – if implemented could help to avoid likely significant effect	Could the policy/site allocation have likely significant effects on European sites (taking mitigation into account)?
			<p>the European sites to the south of the District such as South Dartmoor Woods SAC, the Exe Estuary SPA and Ramsar site and the East Devon Pebblebed Heaths SAC and the East Devon Heaths SPA. However, 710 homes and 30,800m<sup>2</sup> commercial floor space would also come forward in rural areas, and effects associated with traffic and recreation could travel; therefore any European sites could potentially be affected.</p>	<p>Use of good practice construction techniques during the development.</p>	<p>of likely significant effects associated with the overall scale of development proposed in Mid-Devon.</p>
<p>Policy S4: Meeting housing needs</p>	<p>Residential development (7,100 new homes) Development of Gypsy and Traveller sites Increased recreation pressure Increased vehicle traffic</p>	<p>Uncertain but may include: Loss of/damage to offsite habitat Non-physical disturbance such as noise/vibration and light pollution Erosion/trampling Air pollution</p>	<p>Potentially any within Mid Devon District (+10km) could be affected by increased visitor pressure.  Air pollution could affect the Culm Grasslands SAC, Exe Estuary SPA and Exe Estuary Ramsar site.  Noise, vibration and</p>	<p>Policy S2: Sustainable Development Priorities aims to ensure that new development conserves and enhances the natural environment, including biodiversity. It also aims to reduce the need to travel by car and avoid unacceptable levels of water, air and</p>	<p>Uncertain – while the Local Plan Review includes a number of policies which should help to mitigate the potential impacts of new housing development, this policy proposes large-scale residential development throughout the Plan-period which could combine to increase visitor pressure at European sites and result in more vehicle traffic and the associated air pollution. Non-</p>

Policy/site allocation	Likely activities (operations) to result as a consequence of the policy/site allocation	Likely effects if policy/site allocation is implemented	European site(s) potentially affected	Potential mitigation measures – if implemented could help to avoid likely significant effect	Could the policy/site allocation have likely significant effects on European sites (taking mitigation into account)?
			light pollution effects, as well as effects relating to the loss of offsite habitat, could only affect the Culm Grasslands SAC due to the distance of other European sites from the District boundary.	<p>noise pollution.</p> <p>Policy S6: Public Open Space requires new development to incorporate open space, which may help to mitigate the potential increased pressure on European sites for recreation that could result from development in Mid Devon District.</p> <p>Policy S10: Environment makes specific reference to the protection and enhancement of designated biodiversity sites.</p> <p>Use of good practice construction techniques during the development.</p>	<p>physical disturbance from housing development (e.g. noise, vibration and light pollution) could potentially affect the Culm Grasslands SAC if housing development were to take place in the north western edge of the District. Development in that location could also result in the loss of or damage to offsite habitat that may be used by the qualifying species of the Culm Grasslands.</p> <p>Until the nature of likely significant effects on the integrity of the European sites have been examined in more detail, it is not possible to rule out the possibility of likely significant effects associated with the overall scale of housing development proposed in Mid-Devon.</p>
Policy S5: Ensuring housing delivery	N/A	N/A	N/A	N/A	No – this policy would not lead directly to housing development; rather it specifies how the Council will ensure that the housing targets set in other policies will be met. Those other policies have been screened separately for their

Policy/site allocation	Likely activities (operations) to result as a consequence of the policy/site allocation	Likely effects if policy/site allocation is implemented	European site(s) potentially affected	Potential mitigation measures – if implemented could help to avoid likely significant effect	Could the policy/site allocation have likely significant effects on European sites (taking mitigation into account)?
					likely effects on European sites.
Policy S6: Public open space	N/A	N/A	N/A	N/A	No – this policy would not lead to development, rather it aims to ensure that housing development in Mid Devon incorporates an appropriate level of open space. This policy may therefore help to mitigate the potential impacts of new housing development on European sites in relation to increased recreation pressure.
Policy S7: Employment	Employment development (154,000m <sup>2</sup> commercial floor space) Increased vehicle traffic	Uncertain but may include: Loss of/damage to offsite habitat Non-physical disturbance such as noise/vibration and light pollution Erosion/trampling Air pollution	Air pollution could affect the Culm Grasslands SAC, Exe Estuary SPA and Exe Estuary Ramsar site.  Noise, vibration and light pollution effects, as well as effects relating to the loss of offsite habitat, could only affect the Culm Grasslands SAC due to the distance of other European sites from the District boundary.	Policy S2: Sustainable Development Priorities aims to ensure that new development conserves and enhances the natural environment, including biodiversity. It also aims to reduce the need to travel by car and avoid unacceptable levels of water, air and noise pollution.  Policy S10: Environment makes specific reference to the protection and enhancement of designated biodiversity	Uncertain – while the Local Plan Review includes a number of policies which should help to mitigate the potential impacts of commercial development, this policy proposes large-scale commercial development throughout the Plan-period which could combine to result in more vehicle traffic and the associated air pollution. Non-physical disturbance from commercial development (e.g. noise, vibration and light pollution) could potentially affect the Culm Grasslands SAC if development were to take place in the north western edge of the District. Development in that location could also result in the loss of or

Policy/site allocation	Likely activities (operations) to result as a consequence of the policy/site allocation	Likely effects if policy/site allocation is implemented	European site(s) potentially affected	Potential mitigation measures – if implemented could help to avoid likely significant effect	Could the policy/site allocation have likely significant effects on European sites (taking mitigation into account)?
				<p>sites.</p> <p>Use of good practice construction techniques during the development.</p>	<p>damage to offsite habitat that may be used by the qualifying species of the Culm Grasslands.</p> <p>Until the nature of likely significant effects on the integrity of the European sites have been examined in more detail, it is not possible to rule out the possibility of likely significant effects associated with the overall scale of employment development proposed in Mid-Devon.</p>
Policy S8: Town Centres	N/A	N/A	N/A	N/A	No – this policy relates to protecting and enhancing the town centres of Tiverton, Cullompton and Crediton and so could help to steer development towards those town centres and therefore away from sensitive European sites.
Policy S9: Infrastructure	Development of transport and other infrastructure	<p>Uncertain but may include:</p> <p>Loss of/damage to offsite habitat</p> <p>Non-physical disturbance such as noise/vibration and light pollution</p> <p>Air pollution</p>	<p>Noise, vibration and light pollution effects, as well as effects relating to the loss of offsite habitat, could only affect the Culm Grasslands SAC due to the distance of other European sites from the District boundary.</p> <p>Air pollution could</p>	Policy S2: Sustainable Development Priorities aims to ensure that new development conserves and enhances the natural environment, including biodiversity. It also aims to avoid unacceptable levels of noise pollution.	Uncertain – this policy could result in the development of new infrastructure to serve development in the District. Such development could potentially affect the Culm Grasslands SAC as a result of noise/vibration and light pollution if it were to be located near to the north western edge of the District. Development in that location could also result in the loss of or damage to offsite

Policy/site allocation	Likely activities (operations) to result as a consequence of the policy/site allocation	Likely effects if policy/site allocation is implemented	European site(s) potentially affected	Potential mitigation measures – if implemented could help to avoid likely significant effect	Could the policy/site allocation have likely significant effects on European sites (taking mitigation into account)?
			affect the Culm Grasslands SAC, Exe Estuary SPA and Exe Estuary Ramsar site.	<p>Policy S10: Environment makes specific reference to the protection and enhancement of designated biodiversity sites.</p> <p>Use of good practice construction techniques during the development.</p>	habitat that may be used by the qualifying species of the Culm Grasslands. Any European sites could be affected by increased air pollution if the infrastructure improvements are to include improvements to the road network which may encourage car use. Until the nature of likely significant effects on the integrity of the European sites have been examined in more detail, it is not possible to rule out the possibility of likely significant effects associated with infrastructure development in Mid-Devon.
Policy S10: Environment	Development of renewable energy infrastructure	<p>Loss of/damage to offsite habitat</p> <p>Non-physical disturbance such as noise/vibration and light pollution</p>	Noise, vibration and light pollution effects, as well as effects relating to the loss of offsite habitat, could only affect the Culm Grasslands SAC due to the distance of other European sites from the District boundary.	<p>The policy itself states that renewable energy development must be in locations where there is acceptable local impact, including on wildlife.</p> <p>Use of good practice construction techniques during the development.</p>	No – although the policy could encourage the development of renewable energy infrastructure, the policy includes a caveat to ensure that any impacts on wildlife will be of an acceptable level. This is taken to mean that significant impacts on European sites would not be permitted. In addition, the policy includes other criteria specifically aiming to protect the natural environment, including designated biodiversity sites, so should help to mitigate the potential effects of development arising from other Local Plan

Policy/site allocation	Likely activities (operations) to result as a consequence of the policy/site allocation	Likely effects if policy/site allocation is implemented	European site(s) potentially affected	Potential mitigation measures – if implemented could help to avoid likely significant effect	Could the policy/site allocation have likely significant effects on European sites (taking mitigation into account)?
					policies.
Policy S11: Tiverton	Residential development Employment development Increased recreation pressure Higher levels of tourism Increased vehicle traffic	Uncertain but may include: Erosion/trampling Air pollution	Potentially any European sites within Mid Devon (+10km) could be affected by recreation pressure although the closest European site to Tiverton is the Culm Grasslands SAC approximately 10km to the north.  Air pollution could affect the Culm Grasslands SAC, Exe Estuary SPA and Exe Estuary Ramsar site.	Policy S2: Sustainable Development Priorities aims to ensure that new development conserves and enhances the natural environment, including biodiversity. It also aims to reduce the need to travel by car and avoid unacceptable levels of water, air and noise pollution.  Policy S6: Public Open Space requires new development to incorporate open space, which may help to mitigate the potential increased pressure on European sites for recreation that could result from development at Tiverton.  Policy S10: Environment makes specific reference to the protection and enhancement of	Uncertain – while the Local Plan Review includes a number of policies which should help to mitigate the potential impacts of development at Tiverton, and the town lies around 10km from the nearest European site, this policy proposes large-scale development at Tiverton which could combine to result in more vehicle traffic and the associated air pollution and increased pressure for recreation space, particularly as the policy includes a specific aim to increase the tourism role of the town which may in turn increase visitor pressure at nearby European sites. Until the nature of likely significant effects on the integrity of the European sites have been examined in more detail, it is not possible to rule out the possibility of likely significant effects associated with the overall scale of development proposed at Tiverton.  Non-physical disturbance from development at Tiverton (e.g. noise, vibration and light pollution) would not be expected due to the distance of the town from the

Policy/site allocation	Likely activities (operations) to result as a consequence of the policy/site allocation	Likely effects if policy/site allocation is implemented	European site(s) potentially affected	Potential mitigation measures – if implemented could help to avoid likely significant effect	Could the policy/site allocation have likely significant effects on European sites (taking mitigation into account)?
				<p>designated biodiversity sites.</p> <p>Use of good practice construction techniques during the development.</p>	<p>nearest European sites.</p>
<p>Policy S12: Cullompton</p>	<p>Residential development</p> <p>Employment development</p> <p>Construction of an eastern relief road</p> <p>Improvements to the M5 Junction 28</p> <p>Development of public transport infrastructure</p> <p>Increased recreation pressure</p> <p>Higher levels of tourism</p> <p>Increased vehicle traffic</p>	<p>Uncertain but may include:</p> <p>Erosion/trampling</p> <p>Air pollution</p>	<p>Potentially any European sites within Mid Devon (+10km) could be affected by recreation although the closest European sites to Cullompton are those to the south of the District such as the Exe Estuary SPA and Ramsar site and the East Devon Pebblebed Heaths SAC and the East Devon Heaths SPA.</p> <p>Air pollution could affect the Culm Grasslands SAC, Exe Estuary SPA and Exe Estuary Ramsar site.</p>	<p>Policy S2: Sustainable Development Priorities aims to ensure that new development conserves and enhances the natural environment, including biodiversity. It also aims to reduce the need to travel by car and avoid unacceptable levels of water, air and noise pollution.</p> <p>Policy S6: Public Open Space requires new development to incorporate open space, which may help to mitigate the potential increased pressure on European sites for recreation that could result from development at Cullompton.</p>	<p>Uncertain – while the Local Plan Review includes a number of policies which should help to mitigate the potential impacts of development at Cullompton, and the town lies around 12km from the nearest European site, this policy proposes large-scale development at Cullompton which could combine to result in more vehicle traffic and the associated air pollution as well as increased pressure for recreation space, particularly as the policy includes a specific aim to increase the tourism role of the town which may in turn increase visitor pressure at nearby European sites. Increases in vehicle traffic within the District are also likely to result from the development proposed, because the policy proposes improvements to road infrastructure which may encourage ongoing car use. Until the nature of likely significant</p>

Policy/site allocation	Likely activities (operations) to result as a consequence of the policy/site allocation	Likely effects if policy/site allocation is implemented	European site(s) potentially affected	Potential mitigation measures – if implemented could help to avoid likely significant effect	Could the policy/site allocation have likely significant effects on European sites (taking mitigation into account)?
				<p>Policy S10: Environment makes specific reference to the protection and enhancement of designated biodiversity sites.</p> <p>Use of good practice construction techniques during the development.</p>	<p>effects on the integrity of the European sites have been examined in more detail, it is not possible to rule out the possibility of likely significant effects associated with the overall scale of development proposed at Cullompton.</p> <p>Non-physical disturbance from development at Cullompton (e.g. noise, vibration and light pollution) would not be expected due to the distance of the town from the nearest European sites.</p>
Policy S13: Crediton	<p>Residential development</p> <p>Employment development</p> <p>Increased recreation pressure</p> <p>Higher levels of tourism</p> <p>Increased vehicle traffic</p>	<p>Uncertain but may include:</p> <p>Erosion/trampling</p> <p>Air pollution</p>	<p>Potentially any European sites within Mid Devon (+10km) could be affected by increased recreation pressure although the closest European sites to Crediton are those to the south of the District such as South Dartmoor Woods SAC.</p> <p>Air pollution could affect the Culm Grasslands SAC, Exe Estuary SPA and Exe Estuary Ramsar site.</p>	<p>Policy S2: Sustainable Development Priorities aims to ensure that new development conserves and enhances the natural environment, including biodiversity. It also aims to reduce the need to travel by car and avoid unacceptable levels of air and noise pollution.</p> <p>Policy S6: Public Open Space requires new development to incorporate open space,</p>	<p>Uncertain – while the Local Plan Review includes a number of policies which should help to mitigate the potential impacts of development at Crediton, and the town lies around 10km from the nearest European site, this policy proposes large-scale development at Crediton which could combine to result in more vehicle traffic and the associated air pollution and increased pressure for recreation space, particularly as the policy includes a specific aim to increase tourism which may in turn increase visitor pressure at nearby European sites. Until the nature of likely significant effects</p>

Policy/site allocation	Likely activities (operations) to result as a consequence of the policy/site allocation	Likely effects if policy/site allocation is implemented	European site(s) potentially affected	Potential mitigation measures – if implemented could help to avoid likely significant effect	Could the policy/site allocation have likely significant effects on European sites (taking mitigation into account)?
				<p>which may help to mitigate the potential increased pressure on European sites for recreation that could result from development at Crediton.</p> <p>Policy S10: Environment makes specific reference to the protection and enhancement of designated biodiversity sites.</p> <p>Use of good practice construction techniques during the development.</p>	<p>on the integrity of the European sites have been examined in more detail, it is not possible to rule out the possibility of likely significant effects associated with the overall scale of development proposed at Crediton.</p> <p>Non-physical disturbance from development at Crediton (e.g. noise, vibration and light pollution) would not be expected due to the distance of the town from the nearest European sites.</p>
Policy S14: Villages	<p>Residential development</p> <p>Employment development</p> <p>Increased recreation pressure</p> <p>Increased vehicle traffic</p>	<p>Uncertain but may include:</p> <p>Erosion/trampling</p> <p>Air pollution</p>	<p>Potentially any European sites within Mid Devon (+10km) could be affected by increased recreation pressure.</p> <p>Air pollution could affect the Culm Grasslands SAC, Exe Estuary SPA and Exe Estuary Ramsar site.</p>	<p>Policy S2: Sustainable Development Priorities aims to ensure that new development conserves and enhances the natural environment, including biodiversity. It also aims to reduce the need to travel by car and avoid unacceptable levels of air and noise</p>	<p>Uncertain – while the Local Plan Review includes a number of policies which should help to mitigate the potential impacts of new housing and employment development, this policy proposes limited development within the rural areas of Mid Devon, where it may be located within closer proximity of sensitive European sites. The development could combine to increase vehicle traffic</p>

Policy/site allocation	Likely activities (operations) to result as a consequence of the policy/site allocation	Likely effects if policy/site allocation is implemented	European site(s) potentially affected	Potential mitigation measures – if implemented could help to avoid likely significant effect	Could the policy/site allocation have likely significant effects on European sites (taking mitigation into account)?
			<p>Some of the villages named in the policy as being suitable for limited development are within fairly close proximity of European sites which are therefore more likely to be affected, e.g. Hemyock and Culmstock in the east are fairly close to the Quants SAC, Bampton in the north is fairly close to Exmoor and Quantock Oakwoods SAC and Cheriton Bishop in the south is fairly close to the South Dartmoor Woods SAC.</p>	<p>pollution.</p> <p>Policy S6: Public Open Space requires new development to incorporate open space, which may help to mitigate the potential increased pressure on European sites for recreation that could result from development in Mid Devon District.</p> <p>Policy S10: Environment makes specific reference to the protection and enhancement of designated biodiversity sites.</p> <p>Use of good practice construction techniques during the development.</p>	<p>(particularly as public transport options are likely to be more limited in rural areas), and to increase recreation pressure at European sites.</p> <p>Until the nature of likely significant effects on the integrity of the European sites have been examined in more detail, it is not possible to rule out the possibility of likely significant effects associated with the overall scale of development proposed in the rural areas.</p> <p>Non-physical disturbance (e.g. noise, vibration and light pollution) from development at the villages named in this policy would not be expected to occur due to the distance of those villages from the nearest European sites.</p>
Policy S15: Countryside	<p>Affordable housing development</p> <p>Development of Gypsy and Traveller sites</p> <p>Commercial</p>	<p>Loss of/damage to offsite habitat</p> <p>Non-physical disturbance such as noise/vibration and light pollution</p>	<p>Noise, vibration and light pollution effects, as well as effects relating to the loss of offsite habitat, could only affect the Culm Grasslands SAC due to</p>	<p>Policy S2: Sustainable Development Priorities aims to ensure that new development conserves and enhances the natural environment, including</p>	<p>No – this policy could permit various types of development within the countryside, which could contribute to additional vehicle traffic and could potentially result in non-physical disturbance at the Culm Grasslands SAC if the</p>

Policy/site allocation	Likely activities (operations) to result as a consequence of the policy/site allocation	Likely effects if policy/site allocation is implemented	European site(s) potentially affected	Potential mitigation measures – if implemented could help to avoid likely significant effect	Could the policy/site allocation have likely significant effects on European sites (taking mitigation into account)?
	<p>development</p> <p>Extensions and alterations to existing buildings</p> <p>Agricultural and equestrian development</p> <p>Development of community facilities and infrastructure</p> <p>Renewable energy and telecommunications development</p> <p>Tourism and leisure-related development</p> <p>Increased vehicle traffic in the countryside</p>	Air pollution	<p>the distance of other European sites from the District boundary.</p> <p>Air pollution could affect the Culm Grasslands SAC, Exe Estuary SPA and Exe Estuary Ramsar site.</p>	<p>biodiversity. It also aims to reduce the need to travel by car and avoid unacceptable levels of water, air and noise pollution.</p> <p>Policy S10: Environment makes specific reference to the protection and enhancement of designated biodiversity sites.</p> <p>Use of good practice construction techniques during the development.</p>	development were to be located right on the north western edge of the District. However, any development permitted through this policy would be of a small scale meaning that any effects are unlikely to be significant.

#### Site Allocation Policies

Tiverton Site Allocations (Policies TIV1-TIV16)	<p>Residential development</p> <p>Development of Gypsy and Traveller pitches</p> <p>Employment development</p> <p>Infrastructure development</p> <p>Increased recreation pressure</p>	<p>Uncertain but may include:</p> <p>Erosion/trampling</p> <p>Air pollution</p>	<p>Potentially any European sites within Mid Devon (+10km) could be affected by increased recreation pressure although the closest European site to Tiverton is the Culm Grasslands SAC approximately 10km to the north.</p>	<p>The Tiverton site allocations policies themselves include various criteria which should help to mitigate potential impacts, such as the provision of green infrastructure which may help to relieve increased recreation pressure at</p>	<p>Uncertain – while the Local Plan Review includes a number of policies which should help to mitigate the potential impacts of development at Tiverton (including criteria within the site allocations policies themselves), and the site allocations are all located some distance from the nearest European sites, these site allocations in combination would</p>
---	---	---	--	---	---

Policy/site allocation	Likely activities (operations) to result as a consequence of the policy/site allocation	Likely effects if policy/site allocation is implemented	European site(s) potentially affected	Potential mitigation measures – if implemented could help to avoid likely significant effect	Could the policy/site allocation have likely significant effects on European sites (taking mitigation into account)?
	Increased vehicle traffic		Air pollution could affect the Culm Grasslands SAC, Exe Estuary SPA and Exe Estuary Ramsar site.	<p>nearby European sites, and sustainable transport improvements which may help to mitigate increases in vehicle traffic.</p> <p>Policy S2: Sustainable Development Priorities aims to ensure that new development conserves and enhances the natural environment, including biodiversity. It also aims to reduce the need to travel by car and avoid unacceptable levels of air and noise pollution.</p> <p>Policy S6: Public Open Space requires new development to incorporate open space, which may help to mitigate the potential increased pressure on European sites for recreation that could result from development at Tiverton.</p> <p>Policy S10:</p>	<p>result in fairly large-scale development at the town which could affect European sites through increased pressure for recreation space and increased vehicle traffic in particular. Non-physical disturbance from development (e.g. noise, vibration and light pollution) would not be expected as a result of development at Tiverton, due to the distance from European sites. Until the nature of likely significant effects on the integrity of the European sites have been examined in more detail, it is not possible to rule out the possibility of likely significant effects associated with the site allocations at Tiverton.</p>

Policy/site allocation	Likely activities (operations) to result as a consequence of the policy/site allocation	Likely effects if policy/site allocation is implemented	European site(s) potentially affected	Potential mitigation measures – if implemented could help to avoid likely significant effect	Could the policy/site allocation have likely significant effects on European sites (taking mitigation into account)?
				Environment makes specific reference to the protection and enhancement of designated biodiversity sites.	
Cullompton Site Allocations (Policies CU1-CU22)	<p>Residential development</p> <p>Development of Gypsy and Traveller pitches</p> <p>Employment development</p> <p>Construction of an eastern relief road</p> <p>Improvements to road infrastructure, including improvements to the M5 Junction 28</p> <p>Development of sustainable transport infrastructure</p> <p>Increased recreation pressure</p> <p>Increased vehicle traffic</p>	<p>Uncertain but may include:</p> <p>Erosion/trampling</p> <p>Air pollution</p>	<p>Potentially any European sites within Mid Devon (+10km) could be affected by increased recreation pressure although the closest European sites to Cullompton are those to the south of the District such as the Exe Estuary SPA and Ramsar site and the East Devon Pebblebed Heaths SAC and the East Devon Heaths SPA.</p> <p>Air pollution could affect the Culm Grasslands SAC, Exe Estuary SPA and Exe Estuary Ramsar site.</p>	<p>The Cullompton site allocations policies themselves include various criteria which should help to mitigate potential impacts, such as the provision of green infrastructure which may help to relieve increased recreation pressure at nearby European sites, and sustainable transport improvements which may help to mitigate increases in vehicle traffic.</p> <p>Policy S2: Sustainable Development Priorities aims to ensure that new development conserves and enhances the natural environment, including biodiversity. It also aims to reduce the</p>	<p>Uncertain – while the Local Plan Review includes a number of policies which should help to mitigate the potential impacts of development at Cullompton (including criteria within the site allocations policies themselves), and the site allocations are all located some distance from the nearest European sites, these site allocations in combination would result in fairly large-scale development at the town which could affect European sites through increased pressure for recreation space and increased vehicle traffic in particular (the improvements to road infrastructure proposed, particularly under site allocation policies CU13 and CU20, are particularly likely to result in an increase in vehicle traffic and the associated air quality issues). <b>Non-physical disturbance from development (e.g. noise, vibration</b></p>

Policy/site allocation	Likely activities (operations) to result as a consequence of the policy/site allocation	Likely effects if policy/site allocation is implemented	European site(s) potentially affected	Potential mitigation measures – if implemented could help to avoid likely significant effect	Could the policy/site allocation have likely significant effects on European sites (taking mitigation into account)?
				<p>need to travel by car and avoid unacceptable levels of air and noise pollution.</p> <p>Policy S6: Public Open Space requires new development to incorporate open space, which may help to mitigate the potential increased pressure on European sites for recreation that could result from development at Cullompton.</p> <p>Policy S10: Environment makes specific reference to the protection and enhancement of designated biodiversity sites.</p>	<p>and light pollution) would not be expected as a result of development at Cullompton, due to the distance from European sites.</p> <p>Until the nature of likely significant effects on the integrity of the European sites have been examined in more detail, it is not possible to rule out the possibility of likely significant effects associated with the site allocations at Cullompton.</p>
Crediton Site Options (Policies CRE1- CRE10)	<p>Residential development</p> <p>Development of Gypsy and Traveller pitches</p> <p>Employment development</p> <p>Increased recreation</p>	<p>Uncertain but may include:</p> <p>Erosion/trampling</p> <p>Air pollution</p>	Potentially any European sites within Mid Devon (+10km) could be affected by increased recreation pressure although the closest European sites to Crediton are those to	The Crediton site allocations policies themselves include various criteria which should help to mitigate potential impacts, such as the provision of green infrastructure	Uncertain – while the Local Plan Review includes a number of policies which should help to mitigate the potential impacts of development at Crediton (including criteria within the site allocations policies themselves), and the site allocations are all

Policy/site allocation	Likely activities (operations) to result as a consequence of the policy/site allocation	Likely effects if policy/site allocation is implemented	European site(s) potentially affected	Potential mitigation measures – if implemented could help to avoid likely significant effect	Could the policy/site allocation have likely significant effects on European sites (taking mitigation into account)?
	<p>pressure</p> <p>Increased vehicle traffic</p>		<p>the south of the District such as South Dartmoor Woods SAC.</p> <p>Air pollution could affect the Culm Grasslands SAC, Exe Estuary SPA and Exe Estuary Ramsar site.</p>	<p>which may help to relieve increased recreation pressure at nearby European sites, and sustainable transport improvements which may help to mitigate increases in vehicle traffic.</p> <p>Policy S2: Sustainable Development Priorities aims to ensure that new development conserves and enhances the natural environment, including biodiversity. It also aims to reduce the need to travel by car and avoid unacceptable levels of air and noise pollution.</p> <p>Policy S6: Public Open Space requires new development to incorporate open space, which may help to mitigate the potential increased pressure on European sites for recreation that could result from development at</p>	<p>located some distance from the nearest European sites, these site allocations in combination would result in fairly large-scale development at the town which could affect European sites through increased pressure for recreation space and increased vehicle traffic in particular. Non-physical disturbance from development (e.g. noise, vibration and light pollution) would not be expected as a result of development at Crediton, due to the distance from European sites. Until the nature of likely significant effects on the integrity of the European sites have been examined in more detail, it is not possible to rule out the possibility of likely significant effects associated with the site allocations at Crediton.</p>

Policy/site allocation	Likely activities (operations) to result as a consequence of the policy/site allocation	Likely effects if policy/site allocation is implemented	European site(s) potentially affected	Potential mitigation measures – if implemented could help to avoid likely significant effect	Could the policy/site allocation have likely significant effects on European sites (taking mitigation into account)?
				<p>Crediton.</p> <p>Policy S10: Environment makes specific reference to the protection and enhancement of designated biodiversity sites.</p>	
Site Allocations in the Rural Areas	<p>Residential development</p> <p>Employment development</p> <p>Increased recreation pressure</p> <p>Increased vehicle traffic</p>	<p>Uncertain but may include:</p> <p>Erosion/trampling</p> <p>Air pollution</p>	<p>Potentially any European sites within Mid Devon (+10km) could be affected by increased recreation pressure.</p> <p>Air pollution could affect the Culm Grasslands SAC, Exe Estuary SPA and Exe Estuary Ramsar site.</p> <p>Some of the villages where sites have been allocated are within fairly close proximity of European sites which are therefore more likely to be affected, - Hemyock and Culmstock in the east are fairly close to the Quants SAC, Bampton in the north is fairly</p>	<p>Policy S2: Sustainable Development Priorities aims to ensure that new development conserves and enhances the natural environment, including biodiversity. It also aims to reduce the need to travel by car and avoid unacceptable levels of air and noise pollution.</p> <p>Policy S6: Public Open Space requires new development to incorporate open space, which may help to mitigate the potential increased pressure on European sites for recreation that could result from</p>	<p>Uncertain – while the Local Plan Review includes a number of policies which should help to mitigate the potential impacts of new housing and employment development in the rural areas, these policies propose development within the rural areas of Mid Devon, where it may be located within closer proximity of sensitive European sites. The site allocations in combination could lead to an increase in vehicle traffic (particularly as public transport options are likely to be more limited in rural areas), and an increase in recreation pressure at European sites. Non-physical disturbance (e.g. noise, vibration and light pollution) from development at the villages where rural sites have been allocated would not be expected to occur due to the distance of those</p>

Policy/site allocation	Likely activities (operations) to result as a consequence of the policy/site allocation	Likely effects if policy/site allocation is implemented	European site(s) potentially affected	Potential mitigation measures – if implemented could help to avoid likely significant effect	Could the policy/site allocation have likely significant effects on European sites (taking mitigation into account)?
			close to Exmoor and Quantock Oakwoods SAC and Cheriton Bishop in the south is fairly close to the South Dartmoor Woods SAC.	development in Mid Devon District.  Policy S10: Environment makes specific reference to the protection and enhancement of designated biodiversity sites.	villages from the nearest European sites.  Until the nature of likely significant effects on the integrity of the European sites have been examined in more detail, it is not possible to rule out the possibility of likely significant effects associated with the allocation of development sites in rural areas.

**Managing Development (changes to policies since they were brought forward from the adopted LP3 document)**

Replacement of policy relating to Presumption in favour of Sustainable Development with Policy S1 in the strategic section of the new Local Plan <i>(and renumbering of subsequent policies in this section)</i>	N/A	N/A	N/A	N/A	No – the existing policy has simply been included in the new Local Plan under a different policy number.
Removal of text from policy relating to High Quality Design stating that 'major residential development proposals will be required to achieve	N/A	N/A	N/A	N/A	No – this change would not result in development. The affected policy relates to criteria for development that is proposed under other Local Plan policies.

Policy/site allocation	Likely activities (operations) to result as a consequence of the policy/site allocation	Likely effects if policy/site allocation is implemented	European site(s) potentially affected	Potential mitigation measures – if implemented could help to avoid likely significant effect	Could the policy/site allocation have likely significant effects on European sites (taking mitigation into account)?
'green' status under at least 8 of the 12 Building for Life criteria.'					
Deletion of policy relating to Sustainable Design	N/A	N/A	N/A	N/A	No – this policy relates to criteria for development that is proposed under other Local Plan policies and its deletion would not result in significant effects.
Amendment to policy relating to Parking – addition of the word 'minimum' before the non-residential car and cycle parking standards	N/A	N/A	N/A	N/A	No – this change would not result in development. The affected policy relates to criteria for development that is proposed under other Local Plan policies.
Deletion of policy relating to Cross Subsidy of Affordable Housing on Exception Sites	N/A	N/A	N/A	N/A	No – this policy relates to criteria for development that is proposed under other Local Plan policies and its deletion would not result in significant effects.
Minor amendments to the wording of policy relating to Rural Exceptions Sites	Housing development Increased recreation pressure Increased vehicle traffic	Uncertain but may include: Loss of/damage to offsite habitat Non-physical disturbance such as noise/vibration and	Recreation-related effects could potentially affect any European sites around Mid Devon.  Air pollution could affect the Culm Grasslands SAC, Dartmoor SAC, Exe	Policy S2: Sustainable Development Priorities aims to ensure that new development conserves and enhances the natural environment, including biodiversity. It also	No – While this policy could allow for the development of housing in rural areas of Mid Devon, which could result in increased vehicle traffic and increased recreation pressure, the scale of the development is likely to be small and there are a number of policies

Policy/site allocation	Likely activities (operations) to result as a consequence of the policy/site allocation	Likely effects if policy/site allocation is implemented	European site(s) potentially affected	Potential mitigation measures – if implemented could help to avoid likely significant effect	Could the policy/site allocation have likely significant effects on European sites (taking mitigation into account)?
		light pollution Erosion/trampling Air pollution	Estuary SPA and Exe Estuary Ramsar site.  Noise, vibration and light pollution effects, as well as effects relating to the loss of offsite habitat, could only affect the Culm Grasslands SAC due to the distance of other European sites from the District boundary.	aims to reduce the need to travel by car and avoid unacceptable levels of air and noise pollution.  Policy S10: Environment makes specific reference to the protection and enhancement of designated biodiversity sites.  Use of good practice construction techniques during the development.	within the emerging new Local Plan that could provide mitigation. In addition, the policy requires that exception sites adjoin a settlement; therefore it is very unlikely that any sites would be permitted on the periphery of the District near to the Culm Grasslands SAC.
Removal of text from policy relating to Design of Housing stating that 'on sites of 10 houses or more the provision of 20% of dwellings built to the lifetime homes standard'	N/A	N/A	N/A	N/A	No – this change would not result in development. The affected policy relates to criteria for development that is proposed under other Local Plan policies.
Deletion of policy relating to Dwelling Sizes	N/A	N/A	N/A	N/A	No – this policy relates to criteria for development that is proposed under other Local Plan policies and its deletion would not result in significant effects.

<b>Policy/site allocation</b>	<b>Likely activities (operations) to result as a consequence of the policy/site allocation</b>	<b>Likely effects if policy/site allocation is implemented</b>	<b>European site(s) potentially affected</b>	<b>Potential mitigation measures – if implemented could help to avoid likely significant effect</b>	<b>Could the policy/site allocation have likely significant effects on European sites (taking mitigation into account)?</b>
Revisions to policy relating to Protection of Local Green Space and Recreational Land/Buildings	N/A	N/A	N/A	N/A	No – this policy relates to criteria for development that is proposed under other Local Plan policies would not result in development. The policy may provide mitigation for the potential impacts of other Local Plan Review policies in relation to increased recreation pressure at European sites.
Revisions to policy relating to Green Infrastructure in Major Developments	N/A	N/A	N/A	N/A	No – this policy relates to criteria for development that is proposed under other Local Plan policies would not result in development. The policy may provide mitigation for the potential impacts of other Local Plan Review policies in relation to increased recreation pressure at European sites.
Revisions to policy relating to Other Protected Sites	N/A	N/A	N/A	N/A	No – this policy relates to criteria for development that is proposed under other Local Plan policies would not result in development. The policy specifically aims to protect European sites and ensure that development does not result in significant effects on their integrity.

**Appendix 4**

Appropriate Assessment Matrix for the Local Plan  
Review Options

To help navigate through the matrix, SAC sites are highlighted in pale blue, Ramsar sites in pale yellow and SPA sites are in grey.

In addition, Appropriate Assessment conclusions are also colour coded: green where no adverse effects on integrity will occur, orange where adverse effects are uncertain, and red where adverse effects will occur.

Site likely to be affected	Site details and qualifying features	Potential impact identified at Screening stage and Local Plan Review policies/site allocations that may have an effect	Is an adverse effect on site integrity likely?	Mitigation already in Local Plan, and recommendations for mitigating effects within the Local Plan or further work for the HRA	If the mitigation measures and recommendations are implemented would it be possible that there would be no adverse effect on site integrity?
Culm Grasslands SAC	<p>Lies adjacent to the north western boundary of the District.</p> <p>Qualifying features:</p> <ul style="list-style-type: none"> <li>• Molinia meadows on calcareous, peaty or clayey-silt-laden soils (Molinion caeruleae)</li> <li>• Northern Atlantic wet heaths with Erica tetralix</li> <li>• Marsh fritillary butterfly Euphydryas (Eurodryas, Hypodryas) aurinia</li> </ul>	<p><b>Physical damage/loss of habitat</b> as a result of construction from policies S3, S4, S7 and S9</p>	<p><b>Physical damage/loss of habitat</b> within the boundaries of this SAC is not expected to occur, due to its location outside of Mid Devon District where all development resulting from the Local Plan Review would take place. Some of the qualifying features such as the Molinia meadows and northern Atlantic wet heaths are not transient species; therefore the location of the SAC outside of the District also means that the potential for damage/disturbance offsite can be ruled out in relation to those features.</p> <p>However, one of the qualifying features of the SAC, the marsh fritillary butterfly, is a transient species and may make use of areas of habitat outside of the SAC and possibly within Mid Devon District. Therefore, if development were to occur in the area of the District within close proximity of the SAC, the integrity of the SAC could potentially be affected through offsite physical damage/loss of habitat.</p> <p>However, the area of the District in which development would need to occur for this effect to be possible is small and peripheral and does not include any major towns/villages or locations where site allocations are made in the Local Plan Review. Any such development in that area is therefore</p>	<p>The implementation of policies S2: Sustainable Development Priorities and S10: Environment – both aim to ensure that new development conserves and enhances the natural environment, including biodiversity. In particular, policy S2 requires developments to minimise impacts on biodiversity by protecting European designated wildlife sites.</p>	<p>Yes provided recommendation is implemented.</p>

Site likely to be affected	Site details and qualifying features	Potential impact identified at Screening stage and Local Plan Review policies/site allocations that may have an effect	Is an adverse effect on site integrity likely?	Mitigation already in Local Plan, and recommendations for mitigating effects within the Local Plan or further work for the HRA	If the mitigation measures and recommendations are implemented would it be possible that there would be no adverse effect on site integrity?
			<p>expected to comprise only individual rural swellings in exceptional circumstances and is not expected to be of a scale that is likely to affect the integrity of the SAC in relation to offsite loss of habitat.</p>		
Culm Grasslands SAC	As above.	<p><b>Noise, vibration and light pollution</b> as a result of construction from policies S3, S4, S7 and S9</p>	<p>This SAC lies immediately adjacent to the Mid Devon District boundary; therefore where development occurs within 500m of the District boundary in that area there is the potential for the SAC to be affected as a result of noise, vibration or light pollution from new development. Some of the qualifying features of this site, such as the Molinia meadows and northern Atlantic wet heaths are not vulnerable to the effects of noise, vibration or light pollution; therefore likely significant effects can be ruled out in relation to those features.</p> <p>However, one of the qualifying features of this SAC, the marsh fritillary butterfly, could be vulnerable to noise or vibration, although it is not known to be vulnerable to the effects of light pollution. Therefore, if development were to occur within close proximity of the SAC, it is possible that the integrity of the SAC could be affected by noise/vibration. However, the area of the District in which development would need to occur for this effect to be possible is small and peripheral and does not include any major towns/villages or locations where site allocations are made in the Local Plan Review. Any such development in that area is therefore expected to comprise only individual rural swellings</p>	<p>The implementation of policies S2: Sustainable Development Priorities and S10: Environment – both aim to ensure that new development conserves and enhances the natural environment, including biodiversity. In particular, policy S2 requires developments to minimise impacts on biodiversity by protecting European designated wildlife sites.</p>	<p>Yes provided recommendation is implemented.</p>

Site likely to be affected	Site details and qualifying features	Potential impact identified at Screening stage and Local Plan Review policies/site allocations that may have an effect	Is an adverse effect on site integrity likely?	Mitigation already in Local Plan, and recommendations for mitigating effects within the Local Plan or further work for the HRA	If the mitigation measures and recommendations are implemented would it be possible that there would be no adverse effect on site integrity?
			in exceptional circumstances and is not expected to be of a scale that is likely to affect the integrity of the SAC in relation to noise or vibration.		
Culm Grasslands SAC	As above.	<b>Air pollution</b> as a result of increased vehicle traffic from policies S3, S4, S7, S9, S11, S12, S13 and S14, Tiverton Site Allocations (Policies TIV1-TIV16), Cullompton Site Allocations (Policies CU1-CU22), Crediton Site Options (Policies CRE1-CRE10) and Site Allocations in the Rural Areas	<p>This site is vulnerable to increases in air pollution and the A361, which is the main route between Tiverton and Barnstaple, crosses directly through the middle of the site. Therefore, there is the potential for an increase in vehicle traffic along that route to affect the integrity of the SAC.</p> <p>Supporting data for the transport assessment that has been carried out by Arup on behalf of Mid Devon District Council shows that the implementation of the Local Plan Review is expected to result in an increase in AADT along the A361 between Tiverton and Barnstaple of 251 in a north westerly direction and 256 in a south easterly direction – an increase in AADT of 507). Therefore, in relation to the criteria set out in the Design Manual for Roads and Bridges, this increase is not considered to be significant as it is an increase of less than 1,000.</p>	There are a number of policies in the Local Plan Review encouraging the use of sustainable transport (e.g. policy S2 and criteria in the site allocations policies) that should help to mitigate the potential increase in vehicle traffic in the vicinity of the SAC.	Yes provided mitigation is implemented.
Culm Grasslands SAC	As above.	Erosion/trampling and disturbance as a result of increased <b>recreation pressure</b> from policies S3, S4, S7, S11, S12, S13 and S14, Tiverton Site Allocations (Policies TIV1-TIV16),	There is the potential for adverse effects to be incurred resulting from increased recreation pressure arising from residents within new housing development in Mid Devon, in particular where housing comes forward in the north west of the District. However, Natural England noted in its consultation response to the draft HRA report for the Local Plan Review Options that the wet, boggy ground means that this SAC is not attractive for	The provision of green infrastructure within new developments (e.g. through policy S6 in the Local Plan Review) should help to mitigate the potential increase in visitor numbers at the SAC.	Yes provided mitigation is implemented.

Site likely to be affected	Site details and qualifying features	Potential impact identified at Screening stage and Local Plan Review policies/site allocations that may have an effect	Is an adverse effect on site integrity likely?	Mitigation already in Local Plan, and recommendations for mitigating effects within the Local Plan or further work for the HRA	If the mitigation measures and recommendations are implemented would it be possible that there would be no adverse effect on site integrity?
		Cullompton Site Allocations (Policies CU1-CU22), Crediton Site Options (Policies CRE1-CRE10) and Site Allocations in the Rural Areas	recreational purposes and that the qualifying features are more likely to be affected by habitat management than by disturbance or trampling. In addition, the location of the site some distance from the main areas proposed for growth in Mid Devon (Tiverton, Cullompton and Crediton in particular) also means that the site is unlikely to be a popular destination for day to day activities such as dog walking.		
Quants SAC	Lies approximately 1km to the east of Mid Devon District.  Qualifying features: <ul style="list-style-type: none"><li>Marsh fritillary butterfly Euphydryas (Eurodryas, Hypodryas) aurinia</li></ul>	Erosion/trampling and disturbance as a result of increased <b>recreation pressure</b> from policies S3, S4, S7, S11, S12, S13 and S14, Tiverton Site Allocations (Policies TIV1-TIV16), Cullompton Site Allocations (Policies CU1-CU22), Crediton Site Options (Policies CRE1-CRE10) and Site Allocations in the Rural Areas	The qualifying butterfly species at this SAC could be disturbed by increased visitor numbers at the site that could result from population growth in the wider area. However, this is a very small site, located some distance from the main areas where development is proposed in Mid Devon (in particular Tiverton, Cullompton and Crediton) and is therefore considered unlikely to experience a significant increase in visitor numbers for day to day activities such as dog walking. It is not known to be currently under pressure from recreation-related activities.	The provision of green infrastructure within new developments (policy S6 in the Local Plan Review) as well as the criteria set out in some of the site allocations policies should help to mitigate the potential increase in visitor numbers at the SAC.	Yes provided mitigation is implemented.
Exmoor Heaths SAC	A fragmented site to the north of Mid Devon. Qualifying features: <ul style="list-style-type: none"><li>Northern Atlantic</li></ul>	Erosion/trampling and disturbance as a result of increased <b>recreation pressure</b> from policies S3, S4,	The SAC is popular for recreational use, attracting walkers and dog walkers. Therefore, population increase in Mid Devon could result in an increase in visitor numbers at the site particularly from housing in the north of the District. Heathland habitats are	The provision of green infrastructure within new developments (policy S6 in the Local Plan Review) as well	Yes provided mitigation is implemented.

Site likely to be affected	Site details and qualifying features	Potential impact identified at Screening stage and Local Plan Review policies/site allocations that may have an effect	Is an adverse effect on site integrity likely?	Mitigation already in Local Plan, and recommendations for mitigating effects within the Local Plan or further work for the HRA	If the mitigation measures and recommendations are implemented would it be possible that there would be no adverse effect on site integrity?
	<p>wet heaths with Erica tetralix</p> <ul style="list-style-type: none"> <li>• European dry heaths</li> <li>• Vegetated sea cliffs of the Atlantic and Baltic Coasts</li> <li>• Blanket bogs</li> <li>• Alkaline fens</li> <li>• Old sessile oak woods</li> </ul>	<p>S7, S11, S12, S13 and S14, Tiverton Site Allocations (Policies TIV1-TIV16), Cullompton Site Allocations (Policies CU1-CU22), CREDITON Site Options (Policies CRE1-CRE10) and Site Allocations in the Rural Areas</p>	<p>vulnerable to the effects of visitors, and additional tourism would potentially result in increased visitor pressure and potential habitat damage. However, the site is not within very close proximity of Mid Devon, or the main locations where development is proposed through the Local Plan Review (particularly Tiverton, Cullompton and Crediton). Therefore, significant increases in day-to-day visitors for dog walking etc. are not considered likely.</p>	<p>as the criteria set out in some of the site allocations policies should help to mitigate the potential increase in visitor numbers at the SAC.</p>	
<p>South Dartmoor Woods SAC</p>	<p>A fragmented site to the south west of Mid Devon.</p> <p>Qualifying features:</p> <ul style="list-style-type: none"> <li>• Old sessile oak woods</li> <li>• European dry heaths</li> </ul>	<p>Erosion/trampling and disturbance as a result of increased <b>recreation pressure</b> from policies S3, S4, S7, S11, S12, S13 and S14, Tiverton Site Allocations (Policies TIV1-TIV16), Cullompton Site Allocations (Policies CU1-CU22), CREDITON Site Options (Policies CRE1-CRE10) and Site Allocations in the Rural Areas</p>	<p>South Dartmoor Woods lies within Dartmoor National Park and has a high degree of visual appeal and areas of heavy recreational pressure. Therefore, population increase in Mid Devon could result in an increase in visitor numbers at the site particularly from housing in the south west of the District. However, the SAC is not within very close proximity of Mid Devon, or the main locations where development is proposed through the Local Plan Review (particularly Tiverton and Cullompton). Therefore, significant increases in day-to-day visitors for dog walking etc. are not considered likely.</p>	<p>The provision of green infrastructure within new developments (policy S6 in the Local Plan Review) as well as the criteria set out in some of the site allocations policies should help to mitigate the potential increase in visitor numbers at the SAC.</p>	<p>Yes provided mitigation is implemented.</p>
<p>Exmoor and Quantack Oakwoods</p>	<p>A fragmented site lying to the north and north east of Mid</p>	<p>Erosion/trampling and disturbance as a result of increased</p>	<p>Additional tourism would potentially result in increased visitor pressure and potential habitat damage at the SAC. However, the site is not within</p>	<p>The provision of green infrastructure within new developments</p>	<p>Yes provided mitigation is implemented.</p>

Site likely to be affected	Site details and qualifying features	Potential impact identified at Screening stage and Local Plan Review policies/site allocations that may have an effect	Is an adverse effect on site integrity likely?	Mitigation already in Local Plan, and recommendations for mitigating effects within the Local Plan or further work for the HRA	If the mitigation measures and recommendations are implemented would it be possible that there would be no adverse effect on site integrity?
SAC	<p>Devon District. Approximately 2.8km from the District boundary at the closest point.</p> <p>Qualifying features:</p> <ul style="list-style-type: none"> <li>• Old sessile oak woods with Ilex and Blechnum in the British Isles</li> <li>• Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae) * Priority feature</li> <li>• Barbastelle Barbastella barbastellus</li> <li>• Bechstein`s bat Myotis bechsteini</li> <li>• Otter Lutra lutra</li> </ul>	<p><b>recreation pressure</b> from policies S3, S4, S7, S11, S12, S13 and S14, Tiverton Site Allocations (Policies TIV1-TIV16), Cullompton Site Allocations (Policies CU1-CU22), Crediton Site Options (Policies CRE1-CRE10) and Site Allocations in the Rural Areas</p>	<p>very close proximity of Mid Devon, or the main locations where development is proposed through the new Local Plan (particularly Tiverton, Cullompton and Crediton). Therefore, significant increases in day-to-day visitors for dog walking etc. are not considered likely.</p>	<p>(policy S6 in the Local Plan Review) as well as the criteria set out in some of the site allocations policies should help to mitigate the potential increase in visitor numbers at the SAC.</p>	
Holme Moor and Clean Moor SAC	<p>A small fragmented site to the north east of Mid Devon.</p> <p>Qualifying features:</p> <ul style="list-style-type: none"> <li>• Calcareous fens with Cladium mariscus and</li> </ul>	<p>Erosion/trampling and disturbance as a result of increased <b>recreation pressure</b> from policies S3, S4, S7, S11, S12, S13 and S14, Tiverton Site</p>	<p>There is the potential for indirect adverse effects to be incurred resulting from increased recreation pressure arising from residents within new housing development in Mid Devon, in particular where housing comes forward in the north east of the District in closest proximity of this SAC. The impacts of off-road vehicles are known to be an</p>	<p>The provision of green infrastructure within new developments (policy S6 in the Local Plan Review) as well as the criteria set out in some of the site</p>	<p>Yes provided mitigation is implemented.</p>

Site likely to be affected	Site details and qualifying features	Potential impact identified at Screening stage and Local Plan Review policies/site allocations that may have an effect	Is an adverse effect on site integrity likely?	Mitigation already in Local Plan, and recommendations for mitigating effects within the Local Plan or further work for the HRA	If the mitigation measures and recommendations are implemented would it be possible that there would be no adverse effect on site integrity?
	species of the <i>Caricion davallianae</i> <ul style="list-style-type: none"> <li>• Molinia meadows</li> </ul>	Allocations (Policies TIV1-TIV16), Cullompton Site Allocations (Policies CU1-CU22), Crediton Site Options (Policies CRE1-CRE10) and Site Allocations in the Rural Areas	<b>issue at this site.</b> However, this is a very small site which is not known to be under existing pressure from recreation. In addition, the location of the site some distance from the main areas proposed for growth in Mid Devon (Tiverton, Cullompton and Crediton in particular) also means that the site is unlikely to be a popular destination for day to day activities such as dog walking.	allocations policies should help to mitigate the potential increase in visitor numbers at the SAC.	
Dartmoor SAC	As above.	Erosion/trampling and disturbance as a result of increased <b>recreation pressure</b> from policies S3, S4, S7, S11, S12, S13 and S14, Tiverton Site Allocations (Policies TIV1-TIV16), Cullompton Site Allocations (Policies CU1-CU22), Crediton Site Options (Policies CRE1-CRE10) and Site Allocations in the Rural Areas	<b>This SAC lies within Dartmoor National Park which is very popular for tourism and the SAC is known to be vulnerable to arson and other effects of high visitor numbers.</b> However, the location of the site some distance from the main areas proposed for growth in Mid Devon (Tiverton, Cullompton and Crediton in particular) means that the site is unlikely to be a popular destination for day to day activities such as dog walking.	The Management Plan for Dartmoor National Park includes mitigation for the impacts of tourism, including the production of specific management plans for heavily used areas and the provision of suitable routes and transport links between key areas. The provision of green infrastructure within new developments (policy S6 in the Local Plan Review) as well as the criteria set out in some of the site allocations policies	<b>Yes provided mitigation is implemented.</b>

Site likely to be affected	Site details and qualifying features	Potential impact identified at Screening stage and Local Plan Review policies/site allocations that may have an effect	Is an adverse effect on site integrity likely?	Mitigation already in Local Plan, and recommendations for mitigating effects within the Local Plan or further work for the HRA	If the mitigation measures and recommendations are implemented would it be possible that there would be no adverse effect on site integrity?
				should also help to mitigate the potential increase in visitor numbers at the SAC.	
Exe Estuary SPA	<p>Approximately 8km to the south of Mid Devon.</p> <p>Qualifying features:</p> <ul style="list-style-type: none"> <li>• Podiceps auritus</li> <li>• Recurvirostra avosetta</li> <li>• Branta bernicla bernicla</li> <li>• Calidris alpina alpina</li> <li>• Haematopus ostralegus</li> <li>• Limosa limosa islandica</li> <li>• Pluvialis squatarola</li> </ul> <p>23811 waterfowl including:</p> <ul style="list-style-type: none"> <li>• Podiceps auritus ,</li> <li>• Branta bernicla bernicla ,</li> <li>• Haematopus ostralegus ,</li> <li>• Recurvirostra avosetta ,</li> <li>• Pluvialis squatarola ,</li> <li>• Calidris</li> </ul>	<p><b>Air pollution</b> as a result of increased vehicle traffic from policies S3, S4, S7, S9, S11, S12, S13 and S14, Tiverton Site Allocations (Policies TIV1-TIV16), Cullompton Site Allocations (Policies CU1-CU22), Crediton Site Options (Policies CRE1-CRE10) and Site Allocations in the Rural Areas</p>	<p>The qualifying bird species of this site are not particularly vulnerable to increased air pollution. In addition, the location where the SPA is within 200m of the M5 is well outside of Mid Devon District, between 10-15km away.</p>	<p>Policies in the new Local Plan relating to the provision of sustainable transport links (S2 and many of the policies for site allocation option) should help to mitigate the potential increases in vehicle traffic resulting from the Local Plan Review.</p>	<p>Yes.</p>

Site likely to be affected	Site details and qualifying features	Potential impact identified at Screening stage and Local Plan Review policies/site allocations that may have an effect	Is an adverse effect on site integrity likely?	Mitigation already in Local Plan, and recommendations for mitigating effects within the Local Plan or further work for the HRA	If the mitigation measures and recommendations are implemented would it be possible that there would be no adverse effect on site integrity?
	alpina alpina , Limosa limosa islandica.				
Exe Estuary SPA	As above.	Erosion/trampling and disturbance as a result of increased <b>recreation pressure</b> from policies S3, S4, S7, S11, S12, S13 and S14, Tiverton Site Allocations (Policies TIV1-TIV16), Cullompton Site Allocations (Policies CU1-CU22), CREDITON Site Options (Policies CRE1-CRE10) and Site Allocations in the Rural Areas	The qualifying bird species at this site are vulnerable to disturbance from recreation, and activities such as bait collection can result in the removal of prey, and the estuary is known to be a popular destination for recreation. However, the SPA is located mainly between 10-15km from the southern edge of Mid Devon and even further from the main areas proposed for growth in Mid Devon (Tiverton, Cullompton and Crediton in particular). Surveys of visitor activities and resulting bird disturbances (flight events) <sup>23</sup> have shown that the majority of disturbance is caused by dog walkers which would be expected to be visiting the estuary from the locality rather than further away locations such as Mid Devon. Therefore, the SPA is not expected to come under significant increased pressure from visitors from Mid Devon, in particular for day to day activities such as dog walking.	The South East Devon European site Mitigation Strategy (Footprint Ecology, 2013) provides a strategy to mitigate for the potential in-combination impacts of new housing development on European sites within and in the vicinity of south east Devon in relation to sites including the Exe Estuary Ramsar site. The provision of green infrastructure within new developments (policy S6 in the Local Plan Review) as well as the criteria set out in some of the site allocations policies should also help to	Yes provided mitigation is implemented.

<sup>23</sup> Footprint Ecology (2013) South East Devon European Site Mitigation Strategy.

Site likely to be affected	Site details and qualifying features	Potential impact identified at Screening stage and Local Plan Review policies/site allocations that may have an effect	Is an adverse effect on site integrity likely?	Mitigation already in Local Plan, and recommendations for mitigating effects within the Local Plan or further work for the HRA	If the mitigation measures and recommendations are implemented would it be possible that there would be no adverse effect on site integrity?
				mitigate the potential increase in visitor numbers at the SPA.	
Exe Estuary Ramsar Site	<p>Approximately 8km to the south of Mid Devon.</p> <p>Qualifying features:</p> <ul style="list-style-type: none"> <li>• 20263 waterfowl</li> <li>• Dark-bellied brent goose, <i>Branta bernicla bernicla</i></li> <li>• Black-tailed godwit, <i>Limosa limosa islandica</i></li> </ul>	<p><b>Air pollution</b> as a result of increased vehicle traffic from policies S3, S4, S7, S9, S11, S12, S13 and S14, Tiverton Site Allocations (Policies TIV1-TIV16), Cullompton Site Allocations (Policies CU1-CU22), CREDITON Site Options (Policies CRE1-CRE10) and Site Allocations in the Rural Areas</p>	<p>The qualifying bird species of this site are not particularly vulnerable to increased air pollution. In addition, the parts of the strategic road network that lie within 200m of the site are outside of Mid Devon District, between 10-15km away.</p>	<p>Policies in the new Local Plan relating to the provision of sustainable transport links (S2 and many of the policies for site allocation option) should help to mitigate the potential increases in vehicle traffic resulting from the Local Plan Review.</p>	Yes.
Exe Estuary Ramsar Site	As above.	<p>Erosion/trampling and disturbance as a result of increased <b>recreation pressure</b> from policies S3, S4, S7, S11, S12, S13 and S14, Tiverton Site Allocations (Policies TIV1-TIV16),</p>	<p>The qualifying bird species at this site are vulnerable to disturbance from recreation, and activities such as bait collection can result in the removal of prey, and the estuary is known to be a popular destination for recreation. However, the Ramsar site is located mainly between 10-15km from the southern edge of Mid Devon and even further from the main areas proposed for growth in Mid Devon (Tiverton, Cullompton and CREDITON in particular).</p>	<p>The South East Devon European site Mitigation Strategy (Footprint Ecology, 2013) provides a strategy to mitigate for the potential in-combination impacts of new housing</p>	Yes provided mitigation is implemented.

Site likely to be affected	Site details and qualifying features	Potential impact identified at Screening stage and Local Plan Review policies/site allocations that may have an effect	Is an adverse effect on site integrity likely?	Mitigation already in Local Plan, and recommendations for mitigating effects within the Local Plan or further work for the HRA	If the mitigation measures and recommendations are implemented would it be possible that there would be no adverse effect on site integrity?
		Cullompton Site Allocations (Policies CU1-CU22), Crediton Site Options (Policies CRE1-CRE10) and Site Allocations in the Rural Areas	Surveys of visitor activities and resulting bird disturbances (flight events) <sup>24</sup> have shown that the majority of disturbance is caused by dog walkers which would be expected to be visiting the estuary from the locality rather than further away locations such as Mid Devon. Therefore, the site is not expected to come under significant increased pressure from visitors from Mid Devon, in particular for day to day activities such as dog walking.	development on European sites within and in the vicinity of south east Devon in relation to sites including the Exe Estuary Ramsar site. The provision of green infrastructure within new developments (policy S6 in the Local Plan Review) as well as the criteria set out in some of the site allocations policies should also help to mitigate the potential increase in visitor numbers at the Ramsar site.	
East Devon Pebblebed Heaths SAC	As above.	Erosion/trampling and disturbance as a result of increased <b>recreation pressure</b> from policies S3, S4, S7, S11, S12, S13 and S14, Tiverton Site	The qualifying species at this site are vulnerable to disturbance from recreation and human activities such as arson, and the heaths are known to be a popular destination for recreation. However, the SAC is located mainly between 10-15km from the southern edge of Mid Devon and even further from the main areas proposed for growth in Mid Devon	The South East Devon European site Mitigation Strategy (Footprint Ecology, 2013) provides a strategy to mitigate for the potential in-	Yes provided mitigation is implemented.

<sup>24</sup> Footprint Ecology (2013) South East Devon European Site Mitigation Strategy.

Site likely to be affected	Site details and qualifying features	Potential impact identified at Screening stage and Local Plan Review policies/site allocations that may have an effect	Is an adverse effect on site integrity likely?	Mitigation already in Local Plan, and recommendations for mitigating effects within the Local Plan or further work for the HRA	If the mitigation measures and recommendations are implemented would it be possible that there would be no adverse effect on site integrity?
		<p>Allocations (Policies TIV1-TIV16), Cullompton Site Allocations (Policies CU1-CU22), Crediton Site Options (Policies CRE1-CRE10) and Site Allocations in the Rural Areas</p>	<p>(Tiverton, Cullompton and Crediton in particular). Visitor surveys<sup>25</sup> have shown that the vast majority of visits to the Heaths come from the three neighbouring authorities (Exeter, East Devon and Teignbridge), and that the most popular use of the site is for dog walking. Therefore, the SAC is not expected to come under significant increased pressure from visitors from Mid Devon, in particular for day to day activities such as dog walking.</p>	<p>combination impacts of new housing development on European sites within and in the vicinity of south east Devon in relation to sites including the East Devon Pebblebed Heaths SAC. The provision of green infrastructure within new developments (policy S6 in the Local Plan Review) as well as the criteria set out in some of the site allocations policies should also help to mitigate the potential increase in visitor numbers at the SAC.</p>	
East Devon Heaths SPA	As above.	<p>Erosion/trampling and disturbance as a result of increased <b>recreation pressure</b> from policies S3, S4, S7, S11, S12, S13 and</p>	<p>The qualifying bird species at this site are vulnerable to disturbance from recreation and human activities such as arson, and the heaths are known to be a popular destination for recreation. However, the SPA is located mainly between 10-15km from the southern edge of Mid Devon and even further from</p>	<p>The South East Devon European site Mitigation Strategy (Footprint Ecology, 2013) provides a strategy to mitigate</p>	<p>Yes provided mitigation is implemented.</p>

<sup>25</sup> Footprint Ecology (2013) South East Devon European Site Mitigation Strategy.

Site likely to be affected	Site details and qualifying features	Potential impact identified at Screening stage and Local Plan Review policies/site allocations that may have an effect	Is an adverse effect on site integrity likely?	Mitigation already in Local Plan, and recommendations for mitigating effects within the Local Plan or further work for the HRA	If the mitigation measures and recommendations are implemented would it be possible that there would be no adverse effect on site integrity?
		S14, Tiverton Site Allocations (Policies TIV1-TIV16), Cullompton Site Allocations (Policies CU1-CU22), Crediton Site Options (Policies CRE1-CRE10) and Site Allocations in the Rural Areas	the main areas proposed for growth in Mid Devon (Tiverton, Cullompton and Crediton in particular). Visitor surveys <sup>26</sup> have shown that the vast majority of visits to the Heaths come from the three neighbouring authorities (Exeter, East Devon and Teignbridge), and that the most popular use of the site is for dog walking. Therefore, the SPA is not expected to come under significant increased pressure from visitors from Mid Devon, in particular for day to day activities such as dog walking.	for the potential in-combination impacts of new housing development on European sites within and in the vicinity of south east Devon in relation to sites including the East Devon Heaths SPA. The provision of green infrastructure within new developments (policy S6 in the Local Plan Review) as well as the criteria set out in some of the site allocations policies should also help to mitigate the potential increase in visitor numbers at the SPA.	

<sup>26</sup> Footprint Ecology (2013) South East Devon European Site Mitigation Strategy.

