DARTMOOR NATIONAL PARK AUTHORITY LOCAL PLAN REVIEW

HABITATS REGULATIONS (HRA) INITIAL SCREENING REPORT:

July 2017

enfusion

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HABITATS REGULATIONS ASSESSMENT (HRA)

INITIAL SCREENING REPORT

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1.0 INTRODUCTION

The Dartmoor Local Plan Review

1.1 Dartmoor National Park Authority is undertaking a review[1] of the Dartmoor Local Plan. The previous Core Strategy was adopted in 2008, with the Development Management & Delivery DPD adopted in 2013. A Minerals Plan was also included within the previous Local Plan. The New Local Plan will replace these separate Plans with a single document and cover such issues as: house extensions, design, the environment, listed buildings, housing, farming, tourism, quarrying, and land for development. It will include its own waste and minerals policies as the National Park is not included in the Devon County Waste & Minerals Plan.

1.2 Fundamental to the review of the Local Plan are the two statutory[2] purposes of the National Park designation:

- to conserve and enhance the natural beauty, wildlife and cultural heritage
- to promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public

Also, the duty of National Park Authorities in pursuing National Park purposes:

- to seek to foster the economic and social well-being of local communities (within the National Park) by working closely with the agencies and local authorities responsible for these matters

1.3 The Dartmoor Local Plan Regulation 18 draft will comprise a Vision and Strategic Objectives, Core, Strategic and Development Management Policies organised within themes appropriate to planning and caring for the National Park. It will also include proposed site allocations for housing and employment land.

Habitats Regulations Assessment

1.4 The DNPA is required to undertake a Habitats Regulations Assessment (HRA[3]) of the Dartmoor Local Plan Review. The aim of the HRA process is to assess the potential effects arising from a plan against the nature conservation objectives of any site designated for its nature conservation importance. The DNPA has commissioned Enfusion Ltd, independent specialists in sustainability and environmental assessment processes, and who are also undertaking the Sustainability Appraisal of the emerging DNPA Local Plan, to undertake the HRA of the DNPA Local Plan. The HRA process will be undertaken in parallel to

[1] http://www.dartmoor.gov.uk/living-and-working/business/planning-policy/local-plan-review
[2] National Parks & Access to the Countryside Action 1949 as amended by the Environment Act 1995
[3] European Directive (92/43/EEC) on the Conservation of Natural Habitats and Wild Flora and Fauna (1992) Article 6.3

the SA, and the findings of the HRA will inform the SA. The HRA process has its own legislative drivers and requirements and while the different processes can inform each other, it is important that the HRA remains distinguishable from the wider SA process; the detailed method and findings are reported separately.

Consultation

1.5 The Habitats Regulations require the plan-making or competent authority (the Dartmoor National Park Authority) to consult the appropriate nature conservation statutory body – for England, Natural England. The Habitats Regulations leave consultation with other bodies and the public to the discretion of the plan making authority. For the HRA of the Dartmoor Local Plan, DNPA have indicated that they will also consult with the Environment Agency due to the presence of Atlantic Salmon, a qualifying feature for the Dartmoor SAC. The DNPA, in accordance with good practice, will make this Initial HRA Screening Report available for wider public consultation alongside the SA Scoping Report that requires statutory consultation with the environmental bodies at the scoping stage.

Purpose & Structure of Report

1.6 This report documents the updating on the condition of European and Ramsar designated sites; the updating of the plans and programmes review; and sets out how the HRA will be undertaken during the review of the DNPA Local Plan. Following this introductory section, the requirements for HRA are described in section 2, together with the proposed methods. Section 3 explains this consultation and the next steps.

2.0 HABITATS REGULATIONS ASSESSMENT

Requirements for Habitats Regulations Assessment

2.1 The Conservation of Habitats and Species Regulations 2010 (as amended) [the Habitats Regulations] require that HRA is applied to all statutory land use plans in England and Wales. The aim of the HRA process is to assess the potential effects arising from a plan against the conservation objectives of any site designated for its nature conservation importance.

2.2 The Habitats Regulations transpose the requirements of the European Directive (92/43/EEC) on the Conservation of Natural Habitats and Wild Flora and Fauna [the Habitats Directive] which aims to protect habitats and species of European nature conservation importance. The Directive establishes a network of internationally important sites designated for their ecological status. These are referred to as Natura 2000 sites or European Sites, and comprise Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) which are designated under European Directive (2009/147/EC) on the conservation of wild birds [the Birds Directive]. In addition, Government guidance[4] also requires that Ramsar sites (which support internationally important wetland habitats and are listed under the Convention on Wetlands of International Importance [Ramsar Convention]) are included within the HRA process as required by the Regulations.

2.3 The process of HRA is based on the precautionary principle and evidence should be presented to allow a determination of whether the impacts of a land-use plan, when considered individually or in combination with the effects of other plans and projects against the conservation objectives of a European Site (and Ramsar site), would adversely affect the integrity of that site. Where effects are considered uncertain, the potential for adverse impacts should be assumed.

Guidance & Good Practice

2.4 The application of HRA to Local Plans has been informed by key guidance and practice documents. Guidance for HRA was published by the Government[5] based on the European Commission's (2001) guidance for the Appropriate Assessment (AA) of Plans. The Governments guidance recommends three main stages to the HRA process:

- **Stage 1**: Screening for Likely Significant Effect
- **Stage 2:** Appropriate Assessment, Ascertaining Effects on Integrity
- **Stage 3**: Mitigations Measures and Alternatives Assessment.

2.5 If alternative solutions or avoidance/ mitigation measures to remove adverse effects on site integrity cannot be delivered, then current guidance

[4] DEFRA, 2012. The Habitats and Wild Birds Directives in England and its seas- Core guidance for developers, regulators & land/marine managers
[5] DCLG, 2006, Planning for the Protection of European Sites: Appropriate Assessment

recommends an additional stage to consider Imperative Reasons of Overriding Public Interest (IROPI) for why the plan should proceed. For the HRA of land use plans, IROPI is only likely to be justified in a very limited set of circumstances and must be accompanied by agreed, deliverable compensation measures for the habitats and species affected.

2.6 Subsequently, the nature conservation regulator Natural England produced additional, detailed guidance[6] on the HRA of Local Development Documents that complements the DCLG guidance, and builds on assessment experience and relevant court rulings. However, this remained in draft format and is not available on the Natural England website. In 2012, DEFRA published a Core Guidance[7] document relating to the Habitats & Wild Birds Directive, providing information on decision making and the HRA process for developers, regulators and land/marine managers.

2.7 A High Court judgment was handed down on 20 March 2017 in Wealden District Council v Secretary of State for Communities and Local Government, Lewes District Council and South Downs National Park Authority [2017] EWHC 351 (Admin). Wealden District Council brought a challenge against a Joint Core Strategy produced by two of its neighbouring authorities. Natural England provided advice to Lewes District Council and the South Downs National Park Authority on the assessment of air quality impact on Ashdown Forest SAC. This advice was based on nationally developed guidance agreed with other UK statutory nature conservation bodies. The court found that Natural England's advice on the in-combination assessment of air quality impacts in this case was flawed. Natural England is still considering the details of this decision and the implications for their advice; they are advising competent authorities to seek their own legal advice on any implications of this recent judgment for their decisions. The HRA of the emerging DNPA will monitor progress with this situation and take account of any changed advice from the regulator.

Approach & Methods

2.8 This HRA is being undertaken in accordance with good practice, the available guidance on process, and using principles as follows:

- Use existing information
- Early consultation with Natural England (and ongoing, as necessary)
- Proportionate assessment
- Systematic and as simple as possible whilst retaining clear process robustness

2.9 The key stages of the HRA process and the specific tasks undertaken for each stage are set out in Table 2.1 as follows:

[6] Tyldesley, D., 2009, The Habitats Regulations Assessment of Local Development Documents (Natural England)
[7] DEFRA, 2012. The Habitats and Wild Birds Directives in England and its seas - Core guidance for developers, regulators & land/marine managers

Table 2.1: HRA Key Stages:

Stages	Habitats Regulations Assessment
Stage 1: Screening for Likely Significant Effects	1. Identify European sites in and around the plan area.
	2. Examine the conservation objectives of each interest feature of the European site(s) potentially affected.
	3. Analyse the policy/ plan and the changes to environmental conditions that may occur as a result of the plan. Consider the extent of the effects on European sites (magnitude, duration, and location) based on best available information.
	4. Examine other plans and programmes that could contribute (cumulatively) to identified impacts/ effects.
	5. Produce screening assessment based on evidence gathered and consult statutory nature conservation body on findings.
	6. If effects are judged likely or uncertainty exists – the precautionary principle applies proceed to Stage 2.
Stage 2: Appropriate Assessment	1. Agree scope and method of Appropriate Assessment with statutory nature conservation body.
	2. Collate all relevant information and evaluate potential impacts on site(s) in light of conservation objectives.
Stage 3: Mitigation Measures and Alternatives Assessment	1. Consider how effect on integrity of site(s) could be avoided by changes to plan and the consideration of alternatives (e.g. an alternative policy/ spatial location). Develop mitigation measures (including timescale and mechanisms for delivery).
	2. Prepare HRA/ AA report and consult statutory body.
	3. Finalise HRA/AA report in line with statutory advice to accompany plan for wider consultation.

2.10 The European site characterisation and the plans/programmes review has been updated as in Tasks 1, 2 & 4 of Stage 1 HRA as described above.

3.0 INITIAL HRA SCREENING

Updating European Sites Characterisation

3.1 In 2014 DNPA published the Dartmoor National Park Management Plan, and as required, a HRA was undertaken (by DNPA) to assess the potential effect of the Plan on Natura 2000 designations. For the HRA of the Local Plan Review it is necessary to assess whether there has been any update in information for the European sites, and whether additional sites may need to be scoped into the assessment.

3.2 The HRA of the Dartmoor National Park Management Plan used a buffer of 12km from the National Park boundary to calculate which European sites had the potential to be affected by the plan. Due to the nature of the potential effects on European sites, which include effects that can vary in distance such as recreational pressure and water pollution, no specific distance is recommended in HRA guidance when determining which European sites need to be assessed by the HRA. Therefore, the 12km buffer was not used in scoping the European sites for the HRA of the Local Plan, but professional judgement was used to determine which Natura 2000 sites were relevant for the HRA. This led to an additional 3 Natura 2000 sites which were not in the Management Plan HRA being scoped into the Local Plan HRA.

Table 3.1- Scoped European Sites

Site Name	Distance from National Park Boundary	Scoped into the Management Plan HRA?
Dartmoor SAC	Within the National Park	Yes
South Dartmoor Woods SAC	Within the National Park	Yes
South Hams SAC	Partially within the National Park	Yes
Culm Grasslands SAC	Approx.10.5km	Yes
Blackstone Point SAC	Approx. 13km	No
Plymouth Sound & Estuaries SAC	Approx. 3.5km	Yes
Dawlish Warren SAC	Approx. 17km	No
Tamar Estuaries Complex SPA	Approx. 3.5km	Yes
Exe Estuary SPA	Approx. 16km	Yes
Exe Estuary Ramsar	Approx. 16km	No

3.3 For the Dartmoor Management Plan HRA a characterisation of the scoped Natura 2000 sites was undertaken. For the HRA of the Local Plan Review, it was necessary to examine if any of the information had been updated since 2014. It was found that since 2014, for all of the Natura 2000 sites assessed in the Management Plan HRA, there had been an update in the listed vulnerabilities as published by JNCC in 2016. These have been taken into

account and the characterisations updated accordingly. The characterisations of European sites are detailed in Appendix I.

3.4 Across the relevant European sites, including sites within and outside the boundary of the National Park, there are several common vulnerabilities and threats which have been highlighted through the characterisation process. Some of these can be seen listed below, with further details in Appendix I:

- Recreational Pressure
- Pollution (groundwater, air)
- Hydrological changes
- Urbanisation, industrial and developmental activities
- Changes in cultivation practises

3.5 South Hams SAC has been highlighted as a particularly sensitive area for the Greater Horseshoe Bat. Specific planning guidance has been published[8] by Natural England for the SAC to protect the flight paths and foraging areas of the bats, and aid the conservation of the species. Studies are ongoing and it is understood that the technical guidance is being updated, and this will underpin a supplementary Planning Document which will be used by all the Local Planning Authorities. The guidance is scheduled to be ready in 2018, and will focus on changes relating to the bat roosts and the thresholds for HRA requirement.

Plans & Programmes Review

3.6 An initial review of the relevant Plans & Programmes has been undertaken to assess the potential in-combination effects of relevant Plans with the Dartmoor Local Plan.

3.7 The Plans & Programmes review found that several Plans have the potential for a range of in-combination effects with the Dartmoor Local Plan. Overall there are 7 Local Plans in the area surrounding Dartmoor that are proposing new housing and employment development. Arising from this development is the potential for a range of effects on Natura 2000 sites, which can be seen outlined in Table 3.2 and in-combination effects with the Dartmoor Local Plan.

3.8 As well as the surrounding Local Plans, the review concluded that there is the potential for in-combination effects with the Devon Local Transport Plan, the Devon Minerals Plan and the Devon Waste Plan, which all have the potential to increase atmospheric pollution, result in the loss or fragmentation of key habitats and cause disturbance through an increase in noise and light pollution.

Likely Effects from Development

3.9 A summary of the types of effects and impacts that can arise from housing and employment development is provided in Table 3.2 as follows:

[8] Natural England (2010) South Hams SAC- Greater Horseshoe Bat Consultation Zone Planning Guidance

Table 3.2: Housing, Employment and Infrastructure Development - Possible Effects & Impacts on European Sites

Effects on European Sites	Impact Types
Habitat (& species) fragmentation and loss	Direct land take, removal of green/ connecting corridors/ supporting habitat, changes to sediment patterns (rivers and coastal locations) Introduction of invasive species (predation)
Disturbance	Increased recreational activity (population increase) Noise and light pollution (from development and increased traffic)
Changes to hydrological regime/ water levels	Increased abstraction levels (new housing) Increased hard standing non-permeable surfaces/ accelerated run-off Laying pipes/ cables (surface & ground) Topography alteration Changes in land use Loss of soils (new development on greenfield land)
Changes to water quality	Increase in run-off/ pollutants from non-permeable surfaces (roads, built areas) Increased air pollution (eutrophication) (traffic, housing) Increased volume of discharges (consented)
Changes in air quality	Increased traffic movements Increased air pollution, including acid deposition, nitrogen dioxide, ozone Increased emissions from buildings

3.10 The first stage in the screening process will consider the likely significant effects (LSEs) arising from implementation of the draft policies and proposed local sites - and whether these have the potential to lead to potential impacts. The method will consider whether there are any environmental pathways that proposed development can affect or be connected; these may be several kilometres' distance. The regulation draft 18 DNPA Local Plan will include proposed site allocations and policies that can provide mitigation for potential effects of development. These will be investigated through completion of Tasks 3 & 5 in HRA Stage 1 as discussed in the previous section 2.

Next Steps

3.11 Any comments received on this Initial Screening Report and the methods proposed will be taken into consideration during the next stage of assessment and plan-making.

Dartmoor Local Plan Review HRA- Initial Screening: European Site Characterisations

European sites within Dartmoor National Park

Site Name: Dartmoor **Grid Reference: SX590864** **JNCC Site Code: UK0012929** **Size: 23158.64ha** **Designation: SAC**	**Habitats Regulations Assessment: Data Proforma**
Site Description	The site is the largest designated site in the National Park, and consists of three separate blocks of upland with a diverse range of habitats contained within the site. The site is largely dependent on long-established farming techniques which have helped form the ecological character of the SAC. The SAC is also the southernmost blanket bog in Europe. The bogs are dominated by purple moor-grass, with the areas of the bog that are very wet supporting widespread *Sphagnum* mosses. The SAC contains extensive areas of western gorse, with bristle bent dry heath found in lowland areas and heather-bilberry found in upland areas. There are 3 main areas of upland oak woods within the SAC, largely and the rivers and streams located within the SAC contain populations of otter and Atlantic salmon. The habitats within the SAC also support a range of invertebrate and bird species, including Southern damselfly
Qualifying Features	Annex I habitats that are primary reason for selection of the site: ▪ Northern Atlantic wet heaths with *Erica tetralix* ▪ European dry heaths ▪ Blanket bogs ▪ Old sessile oak woods with *Ilex* and *Blechnum* in the British Isles Annex II species that are primary reason for selection of the site: ▪ Southern damselfly Qualifying features but nor primary reason for site selection: ▪ Atlantic Salmon ▪ Otter
Conservation Objectives	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the

Site Name: Dartmoor **Grid Reference: SX590864** **JNCC Site Code: UK0012929** **Size: 23158.64ha** **Designation: SAC**	**Habitats Regulations Assessment: Data Proforma**
	site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; ▪ The extent and distribution of qualifying natural habitats and habitats of qualifying species ▪ The structure and function (including typical species) of qualifying natural habitats ▪ The structure and function of the habitats of qualifying species ▪ The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely ▪ The populations of qualifying species ▪ The distribution of qualifying species within the site
Vulnerabilities (includes existing pressures and trends)	Vulnerabilities listed on the Natura 2000 Standard Data Form: ▪ Human intrusions and disturbances (including recreational activity) (Threat from inside) ▪ Grazing- (Threat from inside) ▪ Air pollution, air-borne pollutants- (Threat from inside & outside) ▪ Pollution to groundwater (point sources and diffuse sources)- (Threat from inside & outside) ▪ Human induced changes in hydraulic conditions- (Threat from inside & outside) Other Vulnerabilities and affected features: ▪ Wildfire/Arson- Features affected: Wet heathland and Blanket bogs ▪ Invasive Species- Features affected: European dry heath ▪ Erosion- Features affected: Blanket bogs, European dry heaths ▪ Disease- Features affected: Western acidic oak woodland ▪ Changes in Land Management- Features affected: Wet heathland, European dry heaths, Blanket bogs

Site Name: South Dartmoor Woods **Grid Reference: SX710701** **JNCC Site Code: UK0012749** **Size: 2159.06ha** **Designation: SAC**	**Habitats Regulations Assessment: Data Proforma**
Site Description	The South Dartmoor Woods SAC site is located in the east of the National Park, and is largely comprised of old sessile oak woods which supports nationally important assemblages of lower plants that are unique in Western Europe. The site is a popular recreational area, The woodland is part of a complex mosaic that includes heathland and species associated with open ground, such as the nationally rare high brown fritillary and pearl-bordered fritillary butterfly. Secondary birch has also developed with bracken on the sites of old field systems, where there is active regeneration of oak.
Qualifying Features	Annex I habitats that are primary reason for selection of the site: ▪ Old sessile oak woods with *Ilex* and *Blechnum* in the British Isles Qualifying feature but not a primary reason for site selection: ▪ European dry heaths
Conservation Objectives	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; ▪ The extent and distribution of qualifying natural habitats ▪ The structure and function (including typical species) of qualifying natural habitats ▪ The supporting processes on which qualifying natural habitats rely
Vulnerabilities (includes existing pressures and trends)	Vulnerabilities listed on the Natura 2000 Standard Data Form: ▪ Air pollution, air-borne pollutants- (Threats from inside & outside) Other Vulnerabilities and affected features: ▪ Grazing levels- Features affected: Lower plants, Dry heaths ▪ Recreational pressure- Features affected: Whole site

Site Name: South Hams **Grid Reference: SX942565** **JNCC Site Code: UK0012650** **Size: 126.87ha** **Designation: SAC**	**Habitats Regulations Assessment: Data Proforma**
Site Description	The South Hams SAC is partially located within the National Park boundary, with the rest of the site located to the south east of Dartmoor, on the Devon coastline. The South Hams SAC is thought to hold the largest population of Greater horseshoe bat in the UK, and is the only one containing more than 1,000 adult bats. It contains the largest known maternity roost in the UK and possibly Europe. The site contains both maternity and hibernation sites. Many of the roosts are within caves not open to the public. However, within the National Park boundary there are 3 bat roosts (on the south-eastern edge of Dartmoor), with associated flightpaths and sustenance zones. The unlit countryside of the moor is beneficial for the bats who use the landscapes linear features for navigation purposes. Guidance related to the South Hams SAC and associated bat feature is currently being updated. The SAC is important for its extensive limestone grassland. The limestone headland cliffs of Torbay supports calcareous grassland and scrubland facies. The site is exceptional in that it supports a number of rare and scarce vascular plants. The SAC also supports areas of *Tilio-Acerion* ravine forest, which is woodland containing ash, elm and small leaved lime and field maple. A number of the specific habitat features of the SAC are not relevant for the areas of the SAC located within the National Park boundary. These include the vegetated sea cliffs and limestone grasslands, which are located in the SAC area on the Devon coastline. The SAC area within Dartmoor has a designation focused on the caves and associated bat roosts at Buckfastleigh, and are the relevant features to consider in this HRA.
Qualifying Features	Annex I habitats that are primary reason for selection of the site: ▪ European dry heaths ▪ Semi-natural dry grasslands and scrubland facies on calcareous substrates Annex 1 habitats that are a qualifying feature but not primary reason for site selection ▪ Vegetated seas cliffs of the Atlantic and Baltic Coasts ▪ Caves not open to the public ▪ *Tilio-Acerion* forests of slopes, screes and ravines

Site Name: South Hams **Grid Reference: SX942565** **JNCC Site Code: UK0012650** **Size: 126.87ha** **Designation: SAC**	**Habitats Regulations Assessment: Data Proforma**
	Annex II Species that are primary reason for selection of the site: ▪ Greater horseshoe bat
Conservation Objectives	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; ▪ The extent and distribution of qualifying natural habitats and habitats of qualifying species ▪ The structure and function (including typical species) of qualifying natural habitats ▪ The structure and function of the habitats of qualifying species ▪ The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely ▪ The populations of qualifying species ▪ The distribution of qualifying species within the site
Vulnerabilities (includes existing pressures and trends)	Vulnerabilities listed on the Natura 2000 Standard Data Form: ▪ Other urbanizsation, industrial and similar activities- (Threats from inside & outside) ▪ Human induced changed in hydraulic conditions- (Threats from inside & outside) ▪ Outdoor sports and leisure activities, recreational activities- (Threats from inside & outside) ▪ Modification of cultivation practices- (Threats from inside & outside) ▪ Biocenotic evolution, succession- (Threats from inside & outside) Other Vulnerabilities and affected features: ▪ Physical modification- Features affected: Greater horseshoe bat ▪ Air pollution, risk of atmospheric nitrogen deposition- Features affected: Greater horseshoe bat

European sites outside of the Dartmoor National Park boundary

Site Name: Culm Grasslands **Grid Reference: SS843214** **JNCC Site Code: UK0012679** **Size: 774.21ha** **Designation: SAC**	**Habitats Regulations Assessment: Data Proforma**
Site Description	The Culm Grasslands SAC is located to the north of the National Park, and is comprised of individual blocks located across North Devon. The Culm Grasslands SAC represents *Molinia* meadows in south-west England, and is present as a result of human activity. This site contains extremely diverse examples of the heathy type of fen-meadow, ranging from short, grazed swards through to stands that are transitional to scrub. The 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. The Culm Grasslands SAC also contains the largest cluster of sites for Marsh fritillary in the south-west peninsula. It is judged to be the most important location for the species in its major south-west stronghold.
Qualifying Features	Annex I habitats that are primary reason for selection of the site: ▪ *Molinia* meadows on calcareous, peaty or clayey-silt-laden soils ▪ Northern Atlantic wet heaths with *Erica textrallix* Annex 1 habitats that are a qualifying feature but not primary reason for site selection ▪ Northern Atlantic wet heaths with *Erica textrallix* Annex II species that are primary reason for selection of the site: ▪ Marsh fritillary butterfly
Conservation Objectives	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; ▪ The extent and distribution of qualifying natural habitats and habitats of qualifying species ▪ The structure and function (including typical species) of qualifying natural habitats ▪ The structure and function of the habitats of qualifying species ▪ The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely ▪ The populations of qualifying species

Site Name: Culm Grasslands **Grid Reference: SS843214** **JNCC Site Code: UK0012679** **Size: 774.21ha** **Designation: SAC**	**Habitats Regulations Assessment: Data Proforma**
	▪ The distribution of qualifying species within the site
Vulnerabilities (includes existing pressures and trends)	Vulnerabilities listed on the Natura 2000 Standard Data Form: ▪ Human induced changed in hydraulic conditions- (Threats from inside & outside) ▪ Modification of cultivation practices- (Threats from inside) ▪ Changes in biotic conditions- (Threats from inside & outside) ▪ Air pollution, air-borne pollutants- (Threats from inside & outside) ▪ Cultivation- (Threats from inside) Other Vulnerabilities and affected features: ▪ Hydrological changes- Features affected: Marsh fritillary butterfly ▪ Invasive species- Features affected: Marsh fritillary butterfly

Site Name: Blackstone Point **Grid Reference: SX535462** **JNCC Site Code: UK0030091** **Size: 7.81ha** **Designation: SAC**	**Habitats Regulations Assessment: Data Proforma**
Site Description	Blackstone Point SAC consists of sea cliffs, shingle beach and islets, and supports one of the largest concentrations of shore dock on rocky sea-cliffs in south-west England. In 1999 there were five discrete colonies totalling at least 29 plants.
Qualifying Features	Annex II species that are primary reason for selection of the site: ▪ Shore dock *Rumex rupestris*
Conservation Objectives	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; ▪ The extent and distribution of the habitats of qualifying species ▪ The structure and function of the habitats of qualifying species ▪ The supporting processes on which qualifying species rely ▪ The populations of qualifying species ▪ The distribution of qualifying species within the site
Vulnerabilities (includes existing pressures and trends)	None listed

Site Name: Plymouth Sound & Estuaries **Grid Reference: SX472506** **JNCC Site Code: UK0013111** **Size: 6386.95ha** **Designation: SAC**	**Habitats Regulations Assessment: Data Proforma**
Site Description	Plymouth Sound and Estuaries SAC is located on the south coast of England and straddles the border between Devon and Cornwall. Plymouth Sound and its associated tributaries comprises a complex site of marine inlets. The ria systems entering Plymouth Sound (St John's Lake and parts of the Tavy, Tamar and Lynher), the large bay of the Sound itself, Wembury Bay, and the ria of the River Yealm are of international marine conservation importance because of their wide variety of salinity conditions and sedimentary and reef habitats. The extensive mudflats present throughout the SAC are a highly productive system, forming a critical part of the food chain. The high diversity of habitats and conditions gives rise to communities both representative of ria systems and some very unusual features, including abundant southern Mediterranean-Atlantic species rarely found in Britain. There are extensive and important areas of saltmarsh present, particularly on the Lynher Estuary, with natural transitions to reedbed and fringing woodland. Saltmarsh is an uncommon habitat in the south west and provides important roosting areas for birds. The reef communities which are located in the SAC are important due to the number of species present, with the Devonian limestone reef of particular importance as this is one of only two sites in the south west with coastal Devonian limestone. Intertidal reefs with rockpools at Wembury, Penlee, Hooe Lake Point and the mouth of the Yealm support a nationally uncommon sponge, seasquirt and red algae community.
Qualifying Features	Annex I habitats that are primary reason for selection of the site: ▪ Sandbanks which are slightly covered by sea water all the time ▪ Estuaries ▪ Large shallow inlets and bays ▪ Reefs ▪ Atlantic salt meadows ▪ Mudflats and sandflats not covered by seawater at low tide Annex I habitats that are a qualifying feature but not primary reason for site selection: ▪ Mudflats and sandflats not covered by seawater at low tide

Site Name: Plymouth Sound & Estuaries **Grid Reference: SX472506** **JNCC Site Code: UK0013111** **Size: 6386.95ha** **Designation: SAC**	**Habitats Regulations Assessment: Data Proforma**
	Annex II species that are primary reason for selection of the site: ▪ Shore dock *Rumex rupestris* Annex II species that are a qualifying feature but not primary reason for site selection: ▪ Allis shad *Alosa alosa*
Conservation Objectives	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; ▪ The extent and distribution of qualifying natural habitats and habitats of qualifying species ▪ The structure and function (including typical species) of qualifying natural habitats ▪ The structure and function of the habitats of qualifying species ▪ The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely ▪ The populations of qualifying species, and, ▪ The distribution of qualifying species within the site.
Vulnerabilities (includes existing pressures and trends)	Vulnerabilities listed on the Natura 2000 Standard Data Form: ▪ Other urbanisation, industrial and similar activities- (Threats from inside & outside) ▪ Pollution to groundwater (point sources and diffuse sources)- (Threats from inside & outside) ▪ Human induced change sin hydraulic conditions- (Threats from inside & outside) ▪ Outdoor sports and leisure activities, recreational activities- (Threats from inside and outside) ▪ Changes in abiotic conditions- (Threats from inside & outside) Other Vulnerabilities and affected features: ▪ Inappropriate weirs, dams and other structures- Features affected: Allis shad ▪ Fisheries- Features affected: Reefs, subtidal sandflats, shallow inlets and bays

Site Name: Dawlish Warren SAC **Grid Reference: SX984792** **JNCC Site Code: UK0030130** **Size: 58.69ha** **Designation: SAC**	**Habitats Regulations Assessment: Data Proforma**
Site Description	Dawlish Warren SAC is located to the east of Dartmoor National park, and is situated at the mouth of the Exe Estuary. The SAC is a large sand-spit with a dune system, and contains a wide variety of habitats including sand dunes, dune grassland, dune slacks and heath. The flora includes several plants of local distribution. Short-sward grassland on the warren supports the only mainland British population of the sand crocus *Romulea columnae*. Large populations of petalwort occur in two dune slacks.
Qualifying Features	Annex I Habitats that are primary reason for selection of the site: ▪ Humid dune slacks Annex I habitats that are a qualifying feature but not primary reason for site selection: ▪ White dunes ▪ Grey dunes Annex II Species that are primary reason for selection of the site: ▪ Petalwort, *Petalophyllum ralfsii*
Conservation Objectives	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; ▪ The extent and distribution of qualifying natural habitats and habitats of qualifying ▪ species ▪ The structure and function (including typical species) of qualifying natural habitats ▪ The structure and function of the habitats of qualifying species ▪ The supporting processes on which qualifying natural habitats and the habitats of ▪ qualifying species rely ▪ The populations of qualifying species, and, ▪ The distribution of qualifying species within the site.
Vulnerabilities (includes existing pressures and trends)	Vulnerabilities listed on the Natura 2000 Standard Data Form:

Site Name: Dawlish Warren SAC **Grid Reference: SX984792** **JNCC Site Code: UK0030130** **Size: 58.69ha** **Designation: SAC**	**Habitats Regulations Assessment: Data Proforma**
	▪ Modification of cultivation practices- (Threats from inside) ▪ Outdoor sports and leisure activities, recreational activities- (Threats from inside) ▪ Changes in biotic conditions- (Threats from inside and outside) ▪ Changes in abiotic conditions- (Threats from inside and outside)

Site Name: Tamar Estuaries Complex **Grid Reference: SX472506** **JNCC Site Code: UK9010141** **Size: 1995ha** **Designation: SPA**	**Habitats Regulations Assessment: Data Proforma**
Site Description	The Tamar Estuary lies on the border between Devon and Cornwall on the southern coast of England. The estuary system is a large marine inlet on the English Channel coast comprising the estuaries of the rivers Tamar, Lynher and Tavy which collectively drain an extensive part of Devon and Cornwall. The Tamar river and its tributaries provide the main input of fresh water into the estuary complex, and form a ria (drowned river valley) with Plymouth lying on the eastern shore. The broader lower reaches of the rivers form extensive tidal mud-flats bordered by saltmarsh communities. The mud-flats contain extensive and varied communities rich in bivalves and other invertebrates, and feeding grounds for waterbirds in numbers of European importance. Saltmarshes provide important feeding and roosting areas for large numbers of wintering waterbirds.
Qualifying Features	▪ Little egret *Egretta garzetta*- Non-breeding. 72 individuals representing at least 9.0% of the population in Great Britain (Count as at 1993) ▪ Avocet *Recurvirostra avosetta*, 201 individuals representing at least 15.8% of the wintering population in Great Britain
Conservation Objectives	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring; ▪ The extent and distribution of the habitats of the qualifying features ▪ The structure and function of the habitats of the qualifying features ▪ The supporting processes on which the habitats of the qualifying features rely ▪ The population of each of the qualifying features ▪ The distribution of the qualifying features within the site
Vulnerabilities (includes existing pressures and trends)	Vulnerabilities listed on the Natura 2000 Standard Data Form: ▪ Other urbansation, industrial and similar activities- Inside & outside ▪ Pollution to groundwater (point sources and diffuse sources)- Inside & outside ▪ Outdoor sports and leisure activities, recreational activities- Inside ▪ Changes in abiotic conditions- Inside & outside ▪ Industrial or commercial areas- Outside

Site Name: Exe Estuary **Grid Reference: UK9010081** **JNCC Site Code: UK9010081** **Size: 2345.71ha** **Designation: SPA**	**Habitats Regulations Assessment: Data Proforma**
Site Description	The Exe Estuary is located to the east of the National Park. The site extends 10 km south from Exeter to the open sea at Dawlish Warren. It comprises the waters, foreshore, low-lying land, three saltmarshes and an unusual double spit across the mouth of the estuary, and the sand dunes of Dawlish Warren. The mud- and sand-flats support Eelgrass *Zostera spp.* and *Enteromorpha* beds, and contain an abundance of invertebrates including extensive Mussel beds, which together provide rich feeding habitats for wintering waders and wildfowl. This complex of coastal habitats supports internationally important numbers of wintering and passage waterbirds.
Qualifying Features	▪ Slavonian Grebe (*Podiceps auritus)* ▪ Dark-bellied brent goose (*Branta bernicla bernicla*) ▪ Avocet (*Recurvirostra avosetta)* ▪ Eurasian oystercatcher (*Haematopus ostralegus*) ▪ Grey plover (*Pluvialis squatarola*) ▪ Dunlin (*Calidris alpina alpine*) ▪ Black-tailed godwit (*Limosa limosa islandica*)
Conservation Objectives	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring; ▪ The extent and distribution of the habitats of the qualifying features ▪ The structure and function of the habitats of the qualifying features ▪ The supporting processes on which the habitats of the qualifying features rely ▪ The population of each of the qualifying features ▪ The distribution of the qualifying features within the site.
Vulnerabilities (includes existing pressures and trends)	Vulnerabilities listed on the Natura 2000 Standard Data Form: ▪ Modification of cultivation practices- (Threats from inside) ▪ Changes in biotic conditions- (Threats from inside & outside) ▪ Outdoor sports and leisure activities, recreational activities- (Threats from inside)

Site Name: Exe Estuary **Grid Reference: UK9010081** **JNCC Site Code: UK9010081** **Size: 2345.71ha** **Designation: SPA**	**Habitats Regulations Assessment: Data Proforma**
	▪ Changes in abiotic conditions- (Threats from inside & outside)

Site Name: Exe Estuary **JNCC Site Code: UK11025** **Size: 6806.3ha** **Designation: Ramsar**	**Habitats Regulations Assessment: Data Proforma**
Site Description	The Exe Estuary is located to the east of the National Park. The site extends 10 km south from Exeter to the open sea at Dawlish Warren. 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. 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.
Qualifying Features	▪ Assemblages of international importance ▪ Dark-bellied brent goose (*Branta bernicla bernicla*) ▪ Black-tailed godwit (*Limosa limosa islandica*)
Conservation Objectives	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring; ▪ The extent and distribution of the habitats of the qualifying features ▪ The structure and function of the habitats of the qualifying features ▪ The supporting processes on which the habitats of the qualifying features rely ▪ The population of each of the qualifying features ▪ The distribution of the qualifying features within the site.
Vulnerabilities (includes existing pressures and trends)	Vulnerabilities listed on the Natura 2000 Standard Data Form: ▪ Modification of cultivation practices- (Threats from inside) ▪ Changes in biotic conditions- (Threats from inside & outside) ▪ Outdoor sports and leisure activities, recreational activities- (Threats from inside) ▪ Changes in abiotic conditions- (Threats from inside & outside)

Dartmoor Local Plan Review HRA- Initial Screening: Plans & Programmes Review

Plan/Project	Proposal	Potential impacts that could cause 'in-combination' effects
North Devon & Torridge Local Plan (Adoption planned for 2017)	Will provide 16,469 new homes during the Plan period (up to 2031) and will also provide 110 hectares of employment land.	Proposed housing, employment and infrastructure development has the potential to: increase disturbance (recreational, noise, light); increase atmospheric pollution (diffuse); increase water abstraction; result in the loss or fragmentation of supporting habitat and modify drainage. Potential for in-combination effects with the Dartmoor Local Plan.
Plymouth & South West Devon Joint Local Plan (to be submitted for public examination in Autumn 2017)	The Plan aims for 26,700 new dwellings within the 3 Districts, and 82 hectares of employment land during the Plan period until 2034.	Proposed housing, employment and infrastructure development has the potential to: increase disturbance (recreational, noise, light); increase atmospheric pollution (diffuse); increase water abstraction; result in the loss or fragmentation of supporting habitat and modify drainage. Potential for in-combination effects with the Dartmoor Local Plan.
Teignbridge Local Plan (Adopted 2014)	Will provide 12,400 new homes and 75.7 hectares of employment land during the Plan period until 2033.	Proposed housing, employment and infrastructure development has the potential to: increase disturbance (recreational, noise, light); increase atmospheric pollution (diffuse); increase water abstraction; result in the loss or fragmentation of supporting habitat and modify drainage. Potential for in-combination effects with the Dartmoor Local Plan.

Mid Devon Local Plan (Review, submitted in March for examination)	The Plan will provide 7,860 new homes and 147,000 square metres of commercial development.	Proposed housing, employment and infrastructure development has the potential to: increase disturbance (recreational, noise, light); increase atmospheric pollution (diffuse); increase water abstraction; result in the loss or fragmentation of supporting habitat and modify drainage. Potential for in-combination effects with the Dartmoor Local Plan.
Torbay Local Plan (Adopted 2015	The Local Plan details a need for 8,900 new homes in the area during the Plan period (2015-20130), and 17 hectares of employment land.	Proposed housing, employment and infrastructure development has the potential to: increase disturbance (recreational, noise, light); increase atmospheric pollution (diffuse); increase water abstraction; result in the loss or fragmentation of supporting habitat and modify drainage. Potential for in-combination effects with the Dartmoor Local Plan.
East Devon Local Plan (Adopted 2016)	The Local Plan sets out a need for 17,100 new homes in East Devon during the Plan period (2013-2031), and 150 hectares of land for employment purposes.	Proposed housing, employment and infrastructure development has the potential to: increase disturbance (recreational, noise, light); increase atmospheric pollution (diffuse); increase water abstraction; result in the loss or fragmentation of supporting habitat and modify drainage. Potential for in-combination effects with the Dartmoor Local Plan.
Exeter City Local Plan (Adopted 2012)	During the Plan period (up to 2026) there is an identified need for at least 12,000 new homes, 60 hectares of employment land and 40,000 square metres of retail floorspace.	Proposed housing, employment and infrastructure development has the potential to: increase disturbance (recreational, noise, light); increase atmospheric pollution (diffuse); increase water abstraction; result in the loss or fragmentation of supporting habitat and modify drainage. Potential for in-combination effects with the Dartmoor Local Plan.
Greater Exeter Strategic Plan (Early stages)	The Strategic Plan for the Greater Exeter area, which includes the authorities of East Devon, Mid Devon, Teignbridge, Exeter and	Proposed housing, employment and infrastructure development has the potential to: increase disturbance (recreational, noise, light); increase atmospheric pollution

	Devon County Council, will set strategic policies and proposals for building and land use up to 2040.	(diffuse); increase water abstraction; result in the loss or fragmentation of supporting habitat and modify drainage. Potential for in-combination effects with the Dartmoor Local Plan.
Devon & Torbay Local Transport Plan 3, 2011-2026	Will enhance existing transport Infrastructure in the area and provide new infrastructure to meet the needs of the area. This includes reducing carbon emissions, promoting sustainable transport and promoting economic growth.	Proposed new infrastructure development and enhancements to infrastructure has the potential to: increase disturbance (recreational, noise, light); increase atmospheric pollution (diffuse); increase water abstraction; result in the loss or fragmentation of supporting habitat and modify drainage. Potential for in-combination effects with the Dartmoor Local Plan.
Devon Minerals Plan (2017)	The Devon Minerals Plan provides the policy framework for mineral development in the County, including outlining Mineral Safeguarded Areas and promoting sustainable mineral development.	Potential for an increase in atmospheric pollution through increased traffic, which could reduce air quality; increased levels of disturbance - noise and light pollution; and increased levels of abstraction; surface water run-off and sewerage discharge, which could reduce water quality and levels. Potential for in-combination effects with the Dartmoor Local Plan.
Devon Waste Plan (2014)	Focuses on sustainable waste management within Devon, promoting recycling and reuse, and sustainable waste management.	Potential for an increase in atmospheric pollution through increased traffic, which could reduce air quality and increased levels of disturbance - noise and light pollution. Potential for in-combination effects with the Dartmoor Local Plan.
Dartmoor National Park Management Plan (2014-2019)	The Plan sets out a long-term Vision for Dartmoor, focusing on 3 key themes. The Plan provides a framework for all policies and activities, a focus for the work of the DNPA, and lists priorities which should be actioned within the Plan period.	The HRA of the Plan found that there were no likely significant effects either alone or in-combination, which includes potential in-combination effects with the currently adopted Dartmoor Local Plan. No in-combination effects likely.
South West Water Resource Management Plan (2014)	The Plan outlines how South West Water will manage their water resources to ensure supply levels	The Plan details how South West Water will manage water resources in the district. Due to their conclusion that there are sufficient resources for the Plan period and that therefore

	meet demand levels over the Plan period and outlines forecasts in water consumption and how to promote water efficiency.	there will be no requirement for new infrastructure, the Plan is therefore not likely to have an in-combination effect. The HRA of the Resource Plan concluded that it would not have any individual alone or in-combination effects on European sites. No in-combination effects likely.
South West River Basin Management Plan (2015)	The river basin management plan provides information on the current environmental state of river basin, including the classification (ecological and chemical) of different water bodies. The plan sets objectives for the water bodies in the river basin to achieve, and a framework for action to meet the objectives.	The Plan aims to improve the environmental quality of water bodies in the river basin. The HRA of the Plan concluded that the high level of the Plan and the available mitigation is sufficient to ensure that the Plan will not have any effects on European designated sites. As the Plan will not result in development or an increase in visitors to the National Park, it is not considered that any in-combination effects are likely.