DARTMOOR NATIONAL PARK MANAGEMENT PLAN REVIEW 2020-2045

HABITATS REGULATIONS ASSESSMENT (HRA) REPORT

January 2020

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HRA SCREENING REPORT

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1.0 INTRODUCTION

The Dartmoor National Park Management Plan 2020-2045

1.1 Dartmoor National Park Authority (DNPA) is undertaking a review[1] of the Dartmoor National Park Management Plan (DNPMP). Fundamental to the review of the Management 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

1.2 The draft DNPMP has been developed through technical studies and with wide consultation including the Dartmoor Debates over the summer/autumn 2018, workshops for staff and members, and a Next Generation event for the 18-30 age group. It was decided to develop a bold long-term vision for the National Park through to 2045 – this would set the overall framework within which a focus could be developed for the next 5 years 2020-2025.

1.3 The Management Plan sits alongside the Dartmoor National Park Local Plan (DNPLP) that provides the statutory planning framework for decisions regarding development and the use of land. Both Plans are designed to help deliver the statutory purposes of the National Park. Both Plans have been prepared during a similar timeframe and therefore, they are closely aligned in what they are seeking to achieve. The decisions that the Dartmoor Park Authority makes in relation to planning are also an important element of how the Management Plan will be delivered.

1.4 The preparation of the DNP Local Plan has been informed by Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA). The DNPA commissioned independent specialist consultants Enfusion Ltd to undertake the statutory SA process and the HRA process for both the DNPLP and the DNPMP.

[1] https://www.dartmoor.gov.uk/living-and-working/management-plan/management-plan-review
[2] National Parks & Access to the Countryside Action 1949 as amended by the Environment Act 1995

Habitats Regulations Assessment (HRA)

1.5 Habitats Regulations Assessment (HRA) refers to assessments that must be undertaken in accordance with the Habitats Regulations[3] to determine is a plan or project may affect the protected features of a habitats site. The aim of the HRA process is to assess the potential effects arising from a plan or project against the nature conservation objectives of any site designated for its nature conservation importance. The initial HRA screening stage considers if the potential impacts arising as a result of the plan or project are likely to have a significant effect on these sites either alone or in combination with other plans and projects. If a risk of Likely Significant Effects (LSEs) is identified, then the process should progress to the Appropriate Assessment (AA) stage.

1.6 The HRA of the draft DNPMP has been undertaken in parallel to the SA, and the findings of the HRA have informed 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

1.7 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 (NE). The Habitats Regulations leave consultation with other bodies and the public to the discretion of the plan making authority. For the HRA of the DNPMP, the DNPA will also consult with the Environment Agency (EA) due to the presence of Atlantic Salmon, Otters and Blanket Bog – for which the EA advises it is the lead HRA partner.

1.8 The DNPA has been in iterative and ongoing discussions with Natural England during the preparation of the draft DNP Local Plan 2018-2036[4] that has recently completed its pre-submission stage public consultation. The DNPA and NE are continuing to liaise as the draft Local Plan progresses towards examination and a Statement of Common Ground is being developed. This HRA has taken into account the comments made by NE on the developing Local Plan and the ongoing discussions, particularly with regard to recreational pressures on designated sites.

Purpose & Structure of Report

1.9 This report documents the condition of European and Ramsar designated sites (Appendix I). Methods are outlined in Section 2; Section 3 describes the HRA Screening, with summary and conclusions provided in Section 4.

[3] Conservation of Habitats & Species Regulations 2017 (as amended)
[4] https://www.dartmoor.gov.uk/living-and-working/business/planning-policy/local-plan-review

2.0 HABITATS REGULATIONS ASSESSMENT & THE DRAFT DARTMOOR NATIONAL PARK MANAGEMENT PLAN

Requirements for Habitats Regulations Assessment

2.1 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) that are designated under European Directive (2009/147/EC) on the conservation of wild birds [the Birds Directive]. The UK Government also requires that Ramsar sites (that support internationally important wetland habitats and are listed under the Convention on Wetlands of International Importance [Ramsar Convention]) are included within the HRA process – and as required by the Regulations.

2.2 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 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 the objectives for that site. Where effects are considered uncertain, the potential for adverse impacts should be assumed.

Guidance & Good Practice

2.3 Initial 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 Government's 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: Mitigation Measures and Alternatives Assessment

2.4 If alternative solutions or avoidance/mitigation measures to remove adverse effects on site integrity cannot be delivered, then guidance recommends an additional stage to consider Imperative Reasons of Overriding Public Interest (IROPI) for why the plan should proceed.

2.5 Subsequently, the nature conservation regulator Natural England produced detailed guidance[6] on the HRA of development planning documents that

[5] DCLG, 2006, Planning for the Protection of European Sites: Appropriate Assessment
[6] Tyldesley, D., 2009, The Habitats Regulations Assessment of Local Development Documents (Natural England)

built 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 document relating to the Habitats & Wild Birds Directive, providing information on decision making and the HRA process for developers, regulators and land/marine managers.

2.6 A High Court Judgment in 2017 provided clarification on interpretation of the AQTAG guidance on HRA in-combination assessment relating to industrial installations and emissions to air, and the DMRB guidance on environmental assessment including implications for European sites. The court found that Natural England's advice on the in-combination assessment of air quality impacts in this case was flawed. The case concerned the approach to assessment of in-combination effects with regard to vehicle emissions and nitrogen deposition effects on heathland habitat in the Ashdown Forest SAC. Natural England was required to reconsider its advice regarding in-combination assessment and Highways England has been required to re-examine its Design Manual for Roads & Bridges (DRMB)[7][3].

2.7 As a result of this Judgment, Natural England developed internal guidance[8] in 2018 and advises that usually only those European sites present within 200m of the edge of a road on which a plan or project will generate traffic will need to be considered when checking for LSEs from road traffic emissions with regard to HRAs. Any revision to DMRB has not yet been advised by Highways England. This HRA has been carried out with consideration of the recent internal NE guidance.

2.8 In 2018, the Court of Justice of the European Union (CJEU) issued a judgment[9], which ruled that Article 6(3) of the Habitats Directive must be interpreted as meaning that mitigation measures (referred to in the judgment as measures which are intended to avoid or reduce effects) should be assessed within the framework of an appropriate assessment (AA) and that it is not permissible to take account of measures intended to avoid or reduce the harmful effects of the plan or project on a European site at the screening stage.

2.9 The implication of this judgment is that competent authorities cannot take account of any integrated or additional avoidance or reduction measures when considering at the Habitats Regulations Assessment (HRA) screening stage whether a plan is likely to have an adverse effect on a European Site – and as had been the standard approach applied in the UK. A second judgment (Sweetman II) was issued on 25 July 2018 and provided further clarification on the interpretation of mitigation measures. This HRA has been undertaken with consideration of these two recent Judgments and the updated Government guidance (2019)[10] on HRA screening and the appropriate assessment of plans and projects.

[7] http://www.standardsforhighways.co.uk/ha/standards/dmrb/vol11/index.htm Highways Agency Design Manual for Roads & Bridges (DMRB) Volume 11

[8] NE Internal Guidance – Approach to advising competent authorities on Road Traffic Emissions and HRAs (June 2018)

[9] People over Wind & Sweetman v Coillte Teoranta Case C-323/17

[10] https://www.gov.uk/guidance/appropriate-assessment

Methods

2.10 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

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

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.

The Dartmoor National Park Management Plan 2020-2045

2.12 The draft Dartmoor National Park Management Plan 2020-2045 comprises a long-term Vision for Dartmoor in 2045 with more detail set out in seven Themes. The draft DNPMP sets the context with an introduction, explains the purpose of the Management Plan the purpose and duty of the National Park and the significance of the Dartmoor Commons Act, and demonstrates the Special Qualities for which the Dartmoor National Park is designated. The DNPMP explains the forces of change, including the Government's 25 Year Environment Plan (2018) and the Glover Report (September 2019) that recommends specific proposals to improve and strengthen Management

Plans. The DNPMP has been prepared in the spirit of the Glover Report but it is noted that its' recommendations will require agreement by Government, legislative changes, and new funding.

2.13 The seven Themes are as follows:

- Climate Change (Cross-Cutting)
- Better for the Next Generation (Cross-Cutting & with Next Generation Vision)
- Better for Nature & Natural Beauty
- Better for Cultural Heritage
- Better for Farming & Forestry
- Better for People
- Better for Communities & Business

For each specific theme, the DNPMP considers "*What are we trying to achieve*?" and "*How will we achieve this*? The final section of the Plan proposes "*How do we measure success*?" with indicators to consider progress towards the Vision and outcomes to be monitored through periodic updates to the State of the Park report.

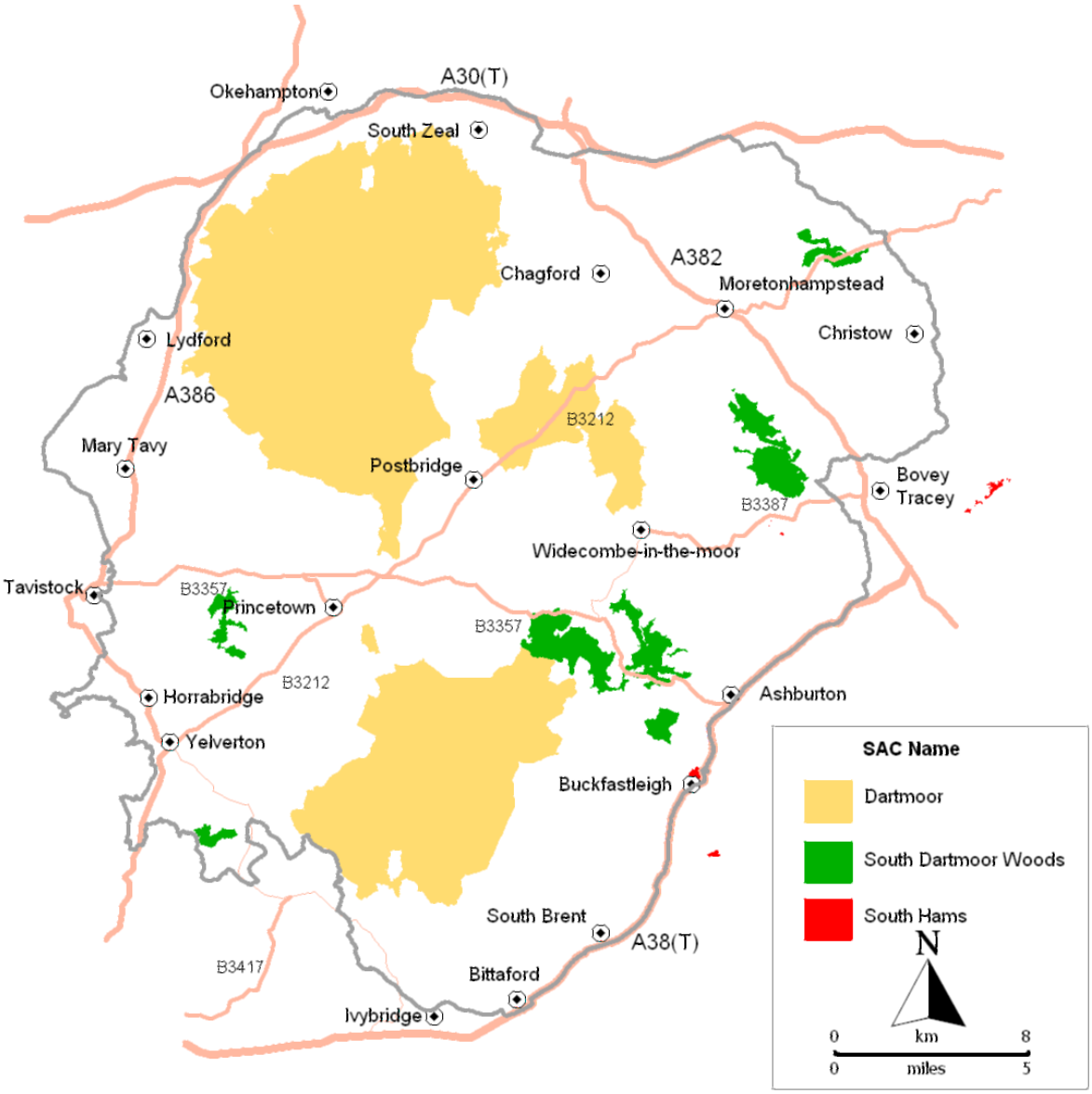
2.14 In preparing the Management Plan, it was clear that there are a number of conflicting or competing objectives and also 'grit issues' where opinions are divided about how the DNPMP should address them. Whilst the Authority will always refer back to the statutory purposes of the National Park when considering such issues, the draft DNPMP sets out Principles to guide decision-making on such Key Challenges, as follows:

- Landscape Management & Nature Recovery
- More Trees
- Existing Conifer Plantations
- A Grazed Moorland Landscape
- More Visitors
- Changing Demographics
- Communication Infrastructure
- Renewable Energy & Energy Efficiency
- Military Training

2.15 The links to other plans and strategies for the Management Plan is explained, including an illustrative diagram. The Management Plan and the Local Plan are the two important statutory documents that guide activity, decision-making and investment on Dartmoor. Both have the same overall objective to help deliver National Park purposes. The Local Plan sets the policies that guide planning decisions about development and the use of the land. The Management Plan is a broader strategic plan that sets out the long-term vision for Dartmoor and provides the framework for partnership working to deliver this. It also provides the strategic context for more specific plans and strategies, for example on nature recovery or recreation management.

2.16 The location of the Dartmoor area with European Sites is shown in the figure as follows:

Figure 2.2: Location of European Sites for the Dartmoor area



Overall Approach to the HRA of the Management Plan

2.17 Whilst the Habitats Regulations require assessment for both plans and projects, it is recognised that the level of detail within a strategic plan, such as a National Park Management Plan, is often insufficient to enable a comprehensive assessment. This contrasts with the assessment of a specific plan or project that might have very detailed information, for example, the Dartmoor Local Plan includes detailed Policies on specific topics and detailed

Site Allocations – and these have been subject to HRA screening and appropriate assessment[11].

2.18 When undertaking HRA on a plan, it is important to ensure that the assessment is carried out at an appropriate scale and level of detail. The Dartmoor National Park Management Plan provides a strategic framework comprising a long-term Vision with aspirational objectives for seven Themes and Principles for guiding decision-making when considering Key Challenges. The Management Plan does not include Policies nor locationally specific plans or projects that are more likely to have identified significant effects on the protected European sites.

2.19 Government guidance[12] on HRA and appropriate assessment of plans or projects advises that where the potential for likely significant effects (LSEs) cannot be excluded, a competent authority must make an appropriate assessment of the implications of the plan or project for that site, in view of the site's conservation objectives. The scope and content of an appropriate assessment will depend on the nature, location, duration and scale of the proposed plan or project and the interest features of the relevant site. The assessment should be proportionate and only need be sufficient to support the determination of whether the plan or project will adversely affect the integrity of the site.

2.20 This HRA has considered the findings of the HRA screening and appropriate assessment, together with comments from Natural England and ongoing discussions, on the emerging draft Dartmoor Local Plan. This HRA has also taken into account the broader strategic role of the Management Plan, together with the role of the Local Plan to help implement many of the aspirations in the Management Plan.

[11] HRA of Final Draft Local Plan (Regulation 19) June 2019 available at https://www.dartmoor.gov.uk/living-and-working/planning/planning-policy/background-evidence

[12] https://www.gov.uk/guidance/appropriate-assessment

3.0 HRA SCREENING

Identification of European Sites & Characterisation

3.1 The current DNPMP 2015-2019[13] was subject to HRA in 2014 and 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 that can vary in distance - such as recreational pressure and water pollution, no specific distance is now recommended in HRA guidance. Therefore, professional judgment was used to determine which Natura 2000 sites were relevant for the HRA of the emerging new Local Plan, as follows:

Table 3.1: Scoped European Sites

Designated Site	Distance from National Park Boundary	Scoped into the MP HRA?
Dartmoor SAC	Within the National Park	Yes
South Dartmoor Woods SAC	Within the National Park	Yes
South Hams SAC	Within the National Park in part	Yes
Culm Grasslands SAC	Approximately 10.5km	No
Blackstone Point SAC	Approximately 13km	No
Plymouth Sound Estuaries SAC	Approximately 3.5km	Yes
Dawlish Warren SAC	Approximately 17km	No
Tamar Estuaries Complex SPA	Approximately 3.5km	Yes
Exe Estuary SPA	Approximately 16km	No
Exe Estuary Ramsar	Approximately 16km	No

3.2 The characterisations of European sites are detailed in Appendix I. It is considered that the scoped sites are relevant for screening assessment of the new DNPMP through the HRA process. The **Culm Grasslands SAC** is located to the north of the National Park and is comprised of individual blocks located across North Devon. The meadows with moor grass *Molinia* species are present due to human activity and contain extremely diverse examples of wet heaths. It is the most important site for the Marsh Fritillary in the south-west. It is considered that any activities arising from the aspirations of the Management Plan would not lead to likely significant effects (LSEs) as the site is approximately 10 km distance and there are no relevant environmental impact pathways identified.

3.3 The **Blackstone SAC** comprises sea cliffs, shingle beach and islets – it is over 10 km distant from the National Park boundary and therefore environmental pathways are unlikely. The site would be sensitive to loss/fragmentation of habitat, but it is considered that any activities arising from the aspirations of the Management Plan would not lead to likely significant effects (LSEs).

[13] https://www.dartmoor.gov.uk/living-and-working/management-plan

3.4 The **Dawlish Warren SAC** is situated at the mouth of the Exe Estuary; it comprises a large sand-spit with a dune system and a wide variety of habitats including sand dunes, dune grassland, dune slacks and heath. It would be vulnerable to air pollution, increased recreational disturbance, and loss or fragmentation; the site is not vulnerable to water-related changes. It is considered that any activities arising from the aspirations of the Management Plan would not lead to likely significant effects (LSEs) as the site is approximately 17 km distance and no relevant environmental impact pathways were identified.

3.5 The **Exe Estuary SPA/Ramsar** is designated for populations of Avocet and Slavonian Grebe as well as being a wetland supporting over 20,000 waterfowl. The site is vulnerable to air quality changes, noise and light pollution, increased recreational disturbance, and loss or fragmentation of habitats. It is considered that any activities arising from the aspirations of the Management Plan would not lead to likely significant effects (LSEs) as the site is approximately 16 km distance and no relevant environmental pathways were identified. The site is within the same water catchment as the National Park and activities arising from the Management Plan could affect water quality or changes in hydraulic conditions. However, it is considered that with the Park boundary approximately 16 km distance, any activities arising from the Management Plan are not likely to be significant when taking into account the distances.

3.6 The **Dartmoor SAC** 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 SAC is largely dependent on long-established farming techniques which have helped form the ecological character of the site; it is the southernmost blanket bog in Europe. The qualifying features include wet and dry heaths, blanket bogs, and old sessile oak woods; the rivers and streams contain populations of Otter and Atlantic Salmon. The site is vulnerable to human disturbances and grazing, and air and water pollution and changes to hydraulic conditions. The dry heaths and blanket bogs are also sensitive to erosion and changes in land management.

3.7 The **South Dartmoor Woods SAC** is located in the east of the National Park and is largely comprised of old sessile oak woods that support 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. Old sessile oak woods are the primary reason for designation, and dry heaths are also a qualifying feature. The site is vulnerable to air pollution, recreational disturbance, and grazing levels.

3.8 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. This SAC is thought to hold the largest population of greater

horseshoe bats in the UK with both maternity and hibernation sites 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. Many of the roosts are within caves not open to the public. The SAC is important for its extensive limestone grassland. The limestone headland cliffs of Torbay support calcareous grassland and scrubland facies. The site is exceptional in that it supports a number of rare and scarce vascular plants.

3.9 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 landscape's linear features for navigation purposes. The greater horseshoe bats are vulnerable to air pollution, changes to hydraulic conditions, recreational and urbanisation disturbance (including noise and light), and modification of cultivation practices.

3.10 The South Hams SAC has been highlighted as a particularly sensitive area for the Greater Horseshoe Bat. Initial guidance was published in 2010[14] 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 have been ongoing and Natural England published updated conservation objectives for the SAC in November 2018 and provided Supplementary Advice in March 2019[15]. Population targets for both maternity and hibernation attributes for greater horseshoe bat have been updated, the use of transitional roosts has been recognised and reference to swarming activity has been removed, a 'supporting off-site (foraging areas)' attribute has been added and text has been amended to acknowledge the use of buildings for hibernation. The local planning authorities continue to consider the situation and have prepared HRA Guidance (June 2019)[16] to guide plan-making and planning applications. This guidance updates and replaces the previous guidance published by Natural England in 2010.

3.11 The **Plymouth Sound & 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 that are of international marine conservation importance because of their wide variety of salinity conditions and sedimentary and reef habitats. The high diversity of habitats and conditions gives rise to communities both representative of ria systems and some very unusual features. 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 habitats are vulnerable to urbanisation, pollution to groundwater and changes to hydraulic conditions, and recreational disturbance.

3.12 The **Tamar Estuaries Complex SPA** is a large marine inlet on the English Channel coast comprising the estuaries of the rivers Tamar, Lynher and Tavy

[14] Natural England (2010) South Hams SAC- Greater Horseshoe Bat Consultation Zone Planning Guidance
[15] http://publications.naturalengland.org.uk/publication/6279422093033472
[16] https://www.devon.gov.uk/planning/planning-policies/other-county-policy-and-guidance/south-hams-sac-guidance

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 mudflats bordered by saltmarsh communities. The mudflats contain extensive and varied communities rich in bivalves and other invertebrates and feeding grounds for water birds in numbers of European importance. Saltmarshes provide important feeding and roosting areas for large numbers of wintering water birds. The habitats of the qualifying features (Little Egret & Avocet) are vulnerable to urbanisation, pollution to groundwater, and recreational disturbance.

3.13 Across the relevant European sites, including sites within and outside the boundary of the National Park, there are several common vulnerabilities and threats that have been highlighted through the characterisation process, as follows:

- Recreational disturbance, including noise and light
- Pollution - groundwater, air
- Hydrological changes – water flow/quantity, and water quality
- Urbanisation, industrial and development activities
- Changes in cultivation practices
- Loss or fragmentation of habitats, including supporting habitats

Other Plans & Projects

3.14 The plans and projects review found that several plans have the potential for a range of in-combination effects with the DNPMP – particularly Local Plans in the area surrounding Dartmoor that are proposing new housing and employment development, as follows:

Table 3.2: Plans that could cause in-combination effects

Local Plans	Relevant Protected Sites
North Devon & Torridge Local Plan to 2031 (adopted Oct 2018)	Dartmoor SAC
Mid Devon Local Plan (submitted 2018; at examination – ongoing)	Dartmoor SAC
Teignbridge Local Plan to 2033 (adopted 2014)	Dartmoor, South Dartmoor Woods, & South Hams SACs
Torbay Local Plan to 2030 (adopted Dec 2015)	South Hams SAC
East Devon Local Plan to 2030 (adopted 2016); Exeter City Local Plan to 2026 (adopted 2012);	Dartmoor, South Dartmoor Woods, & South Hams SACs Culm Grasslands SAC Dawlish Warren SAC

Local Plans	Relevant Protected Sites
Greater Exeter Strategic Plan (GESP)[17] (early stage)	Exe Estuary SPA & Ramsar
Plymouth City; South Hams & West Devon – Plymouth & SW Devon Joint Local Plan[18] (adopted March 2019)	Dartmoor, South Dartmoor Woods, & South Hams SACs Blackstone Point SAC Plymouth Sound & Estuaries SAC Tamar Estuaries SPA

3.15 As well as the surrounding Local Plans, the review identified 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, including through an increase in noise and light pollution. Water management planning could have in-combination effects for water quality and water levels/hydrologic changes with the South West Water Resource Management Plan. There are 5 Areas of Outstanding Beauty (AONBs) in Devon. Three are wholly within the County (North Devon Coasts, East Devon and South Devon) and two (Tamar Valley and Blackdown Hills) are cross-boundary with neighbouring authorities. There is the potential for in-combination effects. It may be noted that these plans are also subject to HRA and SEA.

3.16 Taking into account the detailed HRA screening and appropriate assessment, together with comments made from Natural England through the consultation stages of the emerging draft Dartmoor Local Plan, the key issues for potential in-combination effects with other plans were identified to be disturbance and loss/fragmentation of habitat due to recreational disturbance. This HRA has sought to retain a proportionate approach relevant to a strategic level Management Plan that has close links with the Dartmoor Local Plan for delivery of its' bold aspirations.

Possible Effects from Management Plan Activities

3.17 A summary of the types of effects and impacts that could arise from activities in the DNPMP are set out in Table 3.3, as follows:

Table 3.3: Possible Effects & Impacts on European Sites

Effects on European Sites	Impact Types
Habitat & species fragmentation & loss	Direct land take or land use change – farming/grazing, forestry/woodlands Removal of green/connecting corridors supporting habitat Changes to sediment patterns (rivers and coastal areas)

[17] https://www.gesp.org.uk/

[18] https://www.plymouth.gov.uk/planningandbuildingcontrol/plymouthandsouthwestdevonjointlocalplan

Effects on European Sites	Impact Types
	Loss/erosion of soil, change in quality (visitors, change in use – farming/grazing, forestry) Introduction of invasive species (predation)
Disturbance	Increased recreational activity (population increase) Noise and light pollution (from development, change of use, and increased traffic)
Changes to hydrological regime/water levels	Increased abstraction levels (new development or changes to farming/forestry) Increased hard standing non-permeable surfaces/accelerated run-off Laying pipes/cables (surface & ground) Topography alteration, including changes to a more natural flood management Changes in land use, including farming/grazing, rewilding & new woodland planting Loss of soils (new development on greenfield land)
Changes to water quality	Increase in run-off/pollutants from non-permeable surfaces (roads, built areas) & agricultural/forestry practices, including use of fertilisers & emissions from vehicles – increasing issues for nitrogen neutrality[19] Increased air pollution (traffic, housing) Changes to volume of discharges (consented)
Changes in air quality	Increased traffic movements Changes to air pollution, including acid deposition, nitrogen dioxide, ozone, particulates Increased/changed emissions from buildings

3.18 Appendix I details for each relevant European site:

- The qualifying features
- The conservation objectives
- Any vulnerabilities including existing pressures and trends

Considering these characteristics, and the possible effects from the Management Plan activities, potential impact pathways were identified for each relevant European site, as follows:

[19] For example, in the Solent Estuary – see Natural England Advice for LPAs version 2 June 2019 available at http://www.newforest.gov.uk/media/39460/Advice-on-achieving-nutrient-neutrality-for-new-development-in-the-Solent-region/Pdf/SolentNutrientAdviceV2June2019.pdf

Table 3.4: Potential Impact Pathways

Designated Site	Air Quality	Water Quality	Hydrology	Land Use Change	Recreational Pressure	Species Disturbance
Dartmoor SAC	√	√	√	√	√	?
South Dartmoor Woods SAC	√	0	0	?	√	?
South Hams SAC	0	0	0	√	√	√
Plymouth Sound Estuaries SAC	0	?	?	?	√	0
Tamar Estuaries Complex SPA	0	?	?	?	√	0

Key:

√	Potential environmental impact pathway identified
0	No environmental impact pathway identified
?	Uncertainty of any relevant impact pathway

Screening Assessment of Management Plan Themes

3.19 HRA screening assessment considers those elements of a plan that could have impacts and potential effects where potential environmental impact pathways have been identified and in the light of the environmental conditions necessary to maintain site integrity for the European sites scoped into the assessment.

3.20 It was considered that the seven Themes in the Management Plan comprise the essence of the Plan for delivery of the long-term Vision to 2045. These Themes are the strategic aspirations for activities and actions that could have effects on European sites. Therefore, each Theme was considered for its potential for Likely Significant Effects (LSEs), as follows:

3.21

DNPMP Theme (Cross-Cutting): Climate Change

- Mitigating climate change by reducing emissions
- Adapting to climate change

Aspirations for reducing emissions include a major focus on increasing Dartmoor's carbon storage and sequestration through peatland restoration, natural regeneration, woodland planting and management. Aspirations for adapting to climate change includer a fundamental shift in nature recovery,

establishing nature recovery areas and restoring natural hydrological systems and well managed soils. These climate change aspirations have been integrated into the five specific Themes and therefore, the implications of their potential effects on European sites are addressed later in the following sections.

3.22

DNPMP Theme (Cross-Cutting): Better for the Next Generation

- Infrastructure & Services
- Communities
- Housing
- Job Opportunities & Skills
- Businesses
- Dartmoor's Natural & Cultural Heritage
- Opportunities to Experience Dartmoor
- Understanding & Respect

These aspirations for the next generation also relate to the other Themes in the Management Plan and therefore, are addressed in the relevant Theme in the sections following.

3.23

DNPMP Theme: Better for Nature & Natural Beauty

- Soils are well managed and functioning to improve biodiversity, maximise carbon storage and reduce flood risk
- Hydrological systems are functioning naturally, providing clean, plentiful water and supporting abundant biodiversity
- Existing priority habitats are managed adaptively to reflect environmental change at landscape scale, delivering larger, connected and diverse habitats
- Dynamic, diverse well-functioning ecosystems will be present at landscape scale and maintained by natural processes to ensure resilience and adaptation
- There is an abundance and diversity of species to Dartmoor, which are widespread and thriving
- Key species lost to Dartmoor have been successfully reintroduced, enhancing biodiversity and building future resilience
- Damaging invasive non-native species will be eradicated
- New development will deliver a net gain in biodiversity
- Strategy developed with partners to identify and deliver in areas where biodiversity net gain opportunities would lead to multiple environment net gain benefits
- Maintain and enhance the open moorland landscape whilst encouraging natural woodland expansion along upland river valleys
- Maintain the small-scale pastoral landscape by enhancing boundaries of historic field systems
- Restore treed and wooded landscapes lost through Ash Die Back and other tree diseases
- Through Local Plan policies and development management, ensure that Dartmoor's natural beauty and distinctive landscape character is maintained and enhanced

3.24 These aspirations for nature and natural beauty are general statements with not enough detail yet to investigate whether there would be any adverse effects on the European sites. Overall, the aspirations are likely to protect and enhance the natural environment and therefore, no adverse LSEs are indicated – alone or in-combination with other plans. The intention to eradicate damaging invasive non-native species will contribute to protecting the qualifying habitats and species for the relevant European sites. The intention that new development will deliver a net gain in biodiversity will be guided through the Local Plan Policies that will ensure that there are no adverse LSEs on the European sites.

3.25 The intention to maintain and enhance the open moorland landscape whilst encouraging natural woodland expansion along upland river valleys will ensure that there are no adverse LSEs on the wet and dry heaths, blanket bogs, and old sessile oak woods of the Dartmoor SAC. The rivers and streams contain populations of Otter and Atlantic Salmon and it is not considered that

encouraging natural woodland expansion would have any adverse LSEs on these fish species.

3.26 The intention to ensure that Dartmoor's natural beauty and distinctive landscape character will be maintained and enhanced through the Local Plan Policies and these will ensure that there are no adverse LSEs on the European sites.

DNPMP Theme: Better for Cultural Heritage

- The archaeological heritage will be conserved, enhanced and visible
- The character of Dartmoor's historic built environment and historic vernacular is conserved and enhanced
- Increase understanding of the cultural heritage of Dartmoor and its importance internationally
- Foster and promote a sense of community and place through engagement and experience

3.27

3.28 The aspiration for the archaeological heritage to be conserved, enhanced - and visible - suggests that there could be some investigation and exposure of the archaeological resource that might affect European sites. However, any such investigations would be temporary and be subject to other policy guidance and controls such that adverse LSEs are not indicated. The intention to develop and implement a process for assessing strategic historic environment priorities recognises that there may be competing priorities in relation to other conservation objectives. As this process is developed, the need for any further HRA would be identified and as further details are developed, including any potential locational specificity.

3.29 The intention to ensure that conservation management of cultural heritage is a key focus of the new Environmental Land Management Scheme (ELMS) further recognises the potential for competing conservation objectives and seeks to resolve this. Again, as the ELMS process is developed, the need for any further HRA can be identified.

DNPMP Theme: Better for Farming & Forestry

- The principal drivers for both agriculture and forestry are government policy and the marketing of produce. Specific initiatives include a re-focus for the Dartmoor Hill Farm Project; by 2022 develop a local ELMS; develop the Dartmoor Moorland Vision for the whole of the Park; re-establish the link between moorland and farmland for equitable environmental benefits; support landscape scale action; develop Integrated Land Management Plans for key commons and priority areas; support during Brexit transition; actively engage next generation
- Secure a greater understanding and support amongst the public, policy makers and local communities of the value of high environment, low carbon farming and forestry systems. Better understanding and appreciation will lead to lower levels of anti-social behaviour.
- Value from land-based products (including beef and sheep production) is added and retained in the local economy through local supply chains, processing infrastructure and well-known point-of-sale brands and quality assurance

3.30

3.31 The draft Management Plan acknowledges that the support to farming, and especially hill farming as practiced on Dartmoor, and to forestry is "*undergoing seismic change*" with the Brexit transition and the implementation of the new Environmental Land Management Scheme (ELMS). The Plan recognises that the challenge is to ensure that future farming and forestry practices are viable and deliver the impressive array of public benefits associated with Dartmoor.

3.32 A grazed moorland landscape is recognised and discussed as a key challenge. During development of the draft Management Plan concerns were raised about over-grazing in some areas and under-grazing in other areas, together with conflicts for archaeology and wildlife. The Plan includes the Principle that grazing animals are one of the main tools to deliver the objectives of the Plan; also, the Principle to support high nature/environment value farming (low intensity farming systems which are managed with the production of public goods at the heart) through new ELMS.

3.33 As the Integrated Land Management Plans for key commons and priority areas, and the ELMSs, are developed, the need for any further HRA can be considered - particularly as any locational specificity of proposed schemes and actions are identified. At this stage, the aspirational intentions do not include sufficient details to identify any adverse LSEs.

3.34

DNPMP Theme: Better for People

- Understanding needs & building partnerships
- Reaching out to new audiences & spreading the benefits
- Looking to the future – a focus on young people from all backgrounds
- Continue to deliver the Dartmoor Recreation Strategy – with priorities identified
- Trial innovative approaches at peak times
- Continue with the Rural Crime Initiative
- By 2022 develop an ambitious Green Transport Strategy

3.35 The Management Plan recognises that visitor numbers are expected to increase significantly over the next 10 years arising from the major new housing development planned around the National Park. Sometimes visitor behaviour or the sheer numbers of visitors can cause conflict with local communities and land managers; there also needs to be space for nature recovery. The Plan proposes various initiatives aligned with understanding diverse needs and building partnerships – as these are developed, more sustainable and targeted accessibility is likely to be progressed. At this stage of assessment and strategic plan-making, there is insufficient information to determine the likely effects on European sites. For example, as the identified priorities for the Dartmoor Recreation Strategy are further developed, including consideration of the new Nature Recovery Areas (to be defined), it may be appropriate to consider further HRA.

3.36 The Management Plan seeks to develop an ambitious Green Transport Strategy by 2022 and this is likely to have beneficial effects for European sites by reducing vehicle emissions and potential for nitrogen deposition, as well as contributing to the mitigation of climate change effects that will reduce likely adverse effects on designated sites.

3.37 Overall, at this strategic stage, the aspirational intentions of the Management Plan are to understand needs and build partnerships, deliver the Dartmoor Recreation Strategy, and develop a Green Transport Strategy. Greater understanding and building partnerships will contribute to a greater understanding of the needs of nature and nature recovery – with potential beneficial effects for European sites. As priorities in the Recreation Strategy are further investigated and developed, including potential locational specificities, the need for any further HRA can be considered.

3.38

DNPMP Theme: Better for Communities & Business

- Support delivery of affordable housing, mix of types & tenures, modern vernacular design, sustainable, access to local services & facilities
- Encourage businesses to locate & grow, ensure businesses have suitable premises
- Support Dartmoor's ageing population – encourage skills development that promote health & social care
- Sustain Dartmoor as a tranquil place with Dark Night Skies
- Promote & enable sustainable travel choices
- Help communities make good choices about how they use resources
- Promote local food & Dartmoor brand, develop natural capital markets,
- Enable high quality digital connectivity
- Enable connections with skills & training providers, encourage knowledge based & skilled sectors, promote innovation & depth in the tourist sector, encourage entrepreneurships & new businesses
- Help businesses transition to a low carbon economy

3.39 The Management Plan recognises the needs of Dartmoor's communities and businesses that are so closely associated with the Special Qualities of the National Park, including the designated sites. The aspirational intentions to sustain the local communities and their working lives will help to support and retain the purposes of the Park, including the designated sites. Therefore, it is considered that such aspirations will not have adverse LSEs on the European sites. Intentions for housing, services and facilities will be delivered through the new Local Plan that has been subject to detailed HRA screening and appropriate assessment. The Local Plan includes Policies and Site Allocations that will ensure that there are no adverse significant effects on the European sites.

3.40 Overall, it is considered that the draft Dartmoor National Park Management Plan is not likely to have any significant adverse effects on the integrity of the identified European sites – alone or in-combination with other plans or projects. The Management Plan is an aspirational plan that sets a strategic framework for development of more specific strategies, plans and actions; at this strategic stage there is insufficient information or locational specificity to assess the effects on the European sites. The table following summarises the findings of the HRA screening and this is discussed further for each of the relevant environmental impact pathways and the Key Challenges with proposed Principles set out in the draft Management Plan.

Table 3.5: HRA Screening Summary

European Site	LSEs			
	Air Quality	Water	Recreation Disturbance	Habitat Loss Fragmentation
Dartmoor SAC	No	No	No	No
South Dartmoor Woods SAC	No	No	No	No
South Hams SAC	No	No	No	No
Plymouth Sound Estuaries SAC	No	No	No	No
Tamar Estuaries Complex SPA	No	No	No	No

Key:

Likely Significant Effect	Yes	Appropriate Assessment required
No Likely Significant Effect	No	No further assessment required
Significant Effect Uncertain	?	Uncertain, precautionary approach taken, and Appropriate Assessment required

Air Quality:

3.41 Natural England advises[20] that usually only those European sites present within 200m of the edge of a road on which a plan or project will generate traffic will need to be considered when checking for LSEs from road traffic emissions.

3.42 The Dartmoor SAC comprises three separate blocks of upland with a range of habitats; the heathlands, blanket bogs and oak woodlands are sensitive to atmospheric pollution. Critical loads for nitrogen are not being exceeded at the site[21]. The A386 runs to the western boundary of the Dartmoor SAC in the north-western area of the DNP. However, the boundary is approximately at least 300m distance at the nearest points. The southernmost boundary of this part of the SAC is adjacent to the B3212 for only about 150m. The northern boundary of the central smaller element of the Dartmoor SAC is about 500m south of a small lane that is not a thoroughfare and reverts to a track. For the other element of the Dartmoor SAC to the south, there are only local roads that are not thoroughfares and tend to revert to tracks around the designated area; none are within 200m.

3.43 The South Dartmoor Woods SAC is composed of three areas of woodland adjacent to the northeast of the southern area of the Dartmoor SAC and to the north of Buckfastleigh. Critical loads for nitrogen are not being exceeded

[20] NE Internal Guidance – Approach to advising competent authorities on Road Traffic Emissions and HRAs (June 2018)
[21] Air Pollution Information System Site Relevant Critical Loads (2014-16) http://www.apis.ac.uk/ [Accessed September 2018]

at the site[22] . There are various minor roads and trackways that are within 200m in some places. There is also a smaller area of woodland at Shaugh Prior in the southwest of the DNPA area and this is adjacent to a minor road for a short distance. The oak woods and the dry heath habitats are vulnerable to air pollution.

3.44 The Greater Horseshoe Bat is the primary reason for designation of the South Hams SAC which (apart from the coast some 25 km away) is located in caves in Buckfastleigh some 100m from the A384. There are also several sites in the Haytor and Smallacombe Iron Mines area of the SAC. Air pollution and nitrogen deposition is listed as a vulnerability for the Greater Horseshoe Bat. Critical loads for nitrogen are being exceeded for broadleaved deciduous woodland (supporting habitat for Greater Horseshoe Bats)[23]; also, for dry heaths and Quercus woodland habitats.

3.45 The aspirational intentions for the Management Plan include more sustainable and focused access according to the type of activities, and more sustainable travel – both of these intentions should contribute to reducing vehicle emissions and reduced vulnerabilities for the SACs. It may be necessary to consider HRA screening again for any strategies or plans that are developed, for example, for heavily used recreational sites on the moorland, and for any projects that might affect the bats and the South Hams SAC (although planning guidance exists to avoid any LSEs).

Recreational Disturbance:

3.46 The Plymouth Sound & Estuaries SAC comprises a complex area of marine inlets for the large bay of the Sound itself and its tributaries that are ria systems with extensive waters, sandbanks, mudflats, and salt meadows important for a high diversity of habitats and species. Saltmarsh provides an important roosting area for birds. The SAC is vulnerable to pollution; nitrogen critical loads are not being exceeded[24].

3.47 The Tamar Estuaries SPA is a large marine system comprising the estuaries of the rivers Tamar, Lynher, and Tavy that collectively drain an extensive part of Devon and Cornwall. The mudflats and saltmarshes contain extensive varied communities that provide important feeding and roosting areas for large numbers of wintering waterbirds. The qualifying features of the SPA are the Little Egret and the Avocet, and vulnerabilities include pollution.

3.48 The nearest boundary of the National Park is some 3.5 km away from the nearest part of the designated SAC/SPA area. Part of the south-west of the National Park was identified through studies for the Plymouth & South West Joint Local Plan (PSWJLP)[25] and draft Plymouth Sound & Estuaries SAC/ Tamar

[22] ibid
[23] Air Pollution Information System Site Relevant Critical Loads (2014-16) http://www.apis.ac.uk/ [Accessed September 2018]
[24] ibid
[25] SWJLP adopted 2019
https://www.plymouth.gov.uk/planningandbuildingcontrol/plymouthandsouthwestdevonjointlocalplan

Complex SPA and JLP SPD[26] as falling within some of the zones of influence identified in scenario testing within which development may be considered to have a likely significant impact for recreational disturbance on the SAC/SPA. This issue is an ongoing matter that is being discussed for resolution through a Statement of Common Ground between Natural England, the Plymouth & South West Joint Plan authorities, and the Dartmoor National Park Authority in respect of the new draft Local Plan. The draft Management Plan is not proposing any development in itself; certain delivery mechanisms will be through the Local Plan and subject to Policies that avoid adverse effects on European sites and promote biodiversity net gain.

3.49 The Annex I key features of the Dartmoor SAC are wet and dry heaths, blanket bogs and old oak woods and the site is sensitive to disturbance from recreational activities. The key features of the South Dartmoor Woods SAC include old oak woods and dry heath which are sensitive to disturbance from recreational activities. Recent studies (SWEEP, 2018)[27] focus on the recreational impacts relevant to these habitats of Dartmoor and confirm that population growth in the region around Dartmoor will result in significant increases in recreational use with impacts for wildlife and people.

3.50 The SWEEP Report advises: "For those new residents of the region, Dartmoor offers a significant resource that will likely be the source of substantial economic welfare and also the backdrop that encourages significant physical activity. Of course, that activity will also have impacts on the National Park and drawing on best available evidence the report identifies the possible extent of increased erosion along Dartmoor's paths network and the species and locations most vulnerable to disturbance as a result of increasing recreational pressure". It identifies those areas that might be a focus of concern and the locations in which they are made vulnerable by rising recreation pressures, as follows: the areas around Burrator, the Dart Valley and Venford Reservoir, Haytor, Warren House, Soussons and Fernworthy.

3.51 The SWEEP Report identifies 12 species that stand as examples of species that might be vulnerable to disturbance from increased intensity of recreational activity. For these 12 listed species, 4 are relevant for the Dartmoor SAC: the Greater Horseshoe Bat as an Annex II species is the primary reason for the designation of the site; Southern Damselfly is also listed as an Annex II species; the Atlantic Salmon and Otter are listed as qualifying features (details in Appendix I of this report).

3.51 The sensitivity of the Greater Horseshoe Bat to recreational impacts is identified as high and likely[28]. For the Southern Damselfly and the Atlantic Salmon, the sensitivities are considered to have possible, minor impacts from recreational activities; recreational impacts for the Otter were determined as unlikely for this species.

[26] https://www.plymouth.gov.uk/sites/default/files/JLPSPD2019.pdf
[27] SWEEP for DNPA (August 2018) Population Futures & Dartmoor National Park Implications of development around the outskirts of Dartmoor for recreational use and management of access; available at: https://sweep.ac.uk/population-futures/sweep-dnpa-dartmoor-recreation-futures-extended-summary/
[28] Ibid Table 12, page 65

3.52 Appendix 4 of the SWEEP Report details information on Greater Horseshoe Bats - they can be found roosting in caves, mines, old slate-roofed barns and buildings. Their foraging and commuting requirements include linear features, woodland edges, hedgerows, meadows and cattle-crazed habitats. They feed on a range of insects such as moths, dung beetles and craneflies. Impacts are likely from cars on the road and activities such as caving; other activities such as walking are unlikely to cause issues unless close to roosts or at night with torches. Other threats arise through increases in night-time lighting, for example during large events or through changes in infrastructure and street-lighting and can cause severe detrimental effects by impacting bat commuting routes. Land-use change resulting in losses of foraging sites and commuting routes is a threat - loss of meadows, pastures and grazed areas could have negative effects by causing a reduction in important invertebrate prey species.

3.53 Whilst studies undertaken for the DNPA have indicated significant impacts from the increased recreational access associated with the major new development planned around the National Park, Natural England disagree with the concern raised for potential in-combination effects with the SWJLP and the emerging Greater Exeter Strategic Plan (GESP)[29]. NE has advised that recreational impacts are not identified as a pressure or threat for the Dartmoor or South Dartmoor Woods SACs. However, it is noted that recreational disturbance was investigated through the HRA for the SWJLP. It is assumed that NE consider that the policies in the SWJLP and emerging GESP will ensure that in-combination effects are avoided. Discussions are ongoing and some of the proposals in the management Plan, such as the definition/identification of Nature Recovery Areas and plans for heavily used sites/areas, will help inform the consideration of implications for recreational impacts and the need for any further HRA. It may also be noted that the focus of the DNPMP is on welcoming and managing the visitors who do come and accepting that numbers will increase given the growth in surrounding areas and predictions in the SWEEP report – rather than positively seeking to attract new visitors.

Water Levels & Water Quality

3.54 The European sites outside of the DNPA area are vulnerable to changes in the water environment but environmental pathways and significant effects are unlikely for reasons, as follows:

- Plymouth Sound & Estuaries SAC some 3.5 km away from nearest DNP boundary
- Tamar Estuaries SPA is a large marine area comprising three estuaries and at least 3.5km from the DNP boundary
- Exe Estuary SPA/Ramsar is some 16 km away

[29] https://www.gesp.org.uk/

3.35 It is understood that distance is not a factor when considering changes to water quality and the hydrological regime. The Management Plan recognises that Dartmoor hosts the headwaters of 9 main river catchments, is the principal source of drinking water for much of Devon, and its deep peat, soils and woodlands are important stores of carbon. The Management Plan proposes ambitious nature recovery at a landscape scale by the restoration of natural processes – including rivers & streams, wetland habitats, and the hydrological functions of degraded blanket bogs. Whilst it seems unlikely that proposals from the Plan would be of sufficient scale and proximity to adversely affect the estuarial SACs/SPAs (and the objectives of the DNPMP are more likely to have positive effects), as any specific plans or projects are developed, the need for further HRA may be considered.

Habitat Loss and Fragmentation

3.36 For the European sites outside of the DNPA area, there will be no loss or fragmentation of habitats as there is no land take proposed through the Management Plan, and therefore, no LSEs alone or in-combination with other plans.

3.37 The key challenge for landscape management and nature recovery is recognised and discussed. The bold ambitions in the Management Plan for nature recovery and enhancement means being open to change, but also noting that this brings challenges for other objectives of the Plan including archaeology and landscape character. The Plan sets out Principles that will be applied to guide decision-making – where potential conflict exists between nature recovery areas (to be defined) and archaeology, an initial assessment will be undertaken, and any mitigation measures identified. Such assessment will also indicate whether there is any need for further HRA.

3.38 The Management Plan recognises the key challenge for more trees. There are potential conflicts between more trees and other objectives of the Management Plan, including landscape character and cultural heritage. Ancient and semi-natural woodlands are considered of greater value for cultural heritage and wildlife, whereas conifer plantations are more economically valuable and have the capacity to absorb greater numbers of visitors, including more active recreation such as mountain biking. The Principles to be applied include "enhance biodiversity" such that any implications for the European sites will be addressed, including the need for any further HRA for any specific projects identified and progressed.

3.39 The issue of conifer plantations is recognised with opinions divided between those supporting a long-term aim to remove conifers from the high moor and those who wish to retain the plantations. The Management Plan proposes Principles that phase a longer-term ambition to remove such plantations from the deep peat and restore these peatlands for nature recovery and carbon capture. The SACs are not designated for conifer trees and the intentions will not have any adverse LSEs.

3.40 The Management Plan discusses the issue for a grazed landscape again, with concerns about overgrazing in some areas and under grazing in others, and

the interactions with other objectives including cultural heritage and business/farming. The proposed Principles recognise the issues and understand the links with the new ELMSs such that it is considered that the intentions will not have any adverse LSEs.

3.41 A major challenge is that Dartmoor is predicted to continue to attract more visitors, particularly with the large number of houses being built in surrounding areas. During preparation of the Management Plan, there were conflicting views. The Plan recognises these and proposes Principles that promote understanding and proactively manage visitors through strategic zoning. As any specific projects or plans are developed, the implications for the European sites will be addressed, including the need for any further HRA.

3.42 Changing Demographics is another key challenge that is recognised by the Plan and the proposed Principles link closely with the Local Plan and the Next Generation Vision such that mechanisms are in place to ensure no adverse LSEs.

3.43 Communications and Renewable Energy Infrastructure can be challenging to accommodate without impacts on landscape character and the built environment. Policies are in place through the Local Plan to ensure that there are no adverse LSEs.

3.44 The Management Plan proposes positive management for Military Training with regard to access, nature, cultural heritage, responding to climate and ecological emergency. It is considered that there will be no adverse LSEs.

Further Assessment Needed?

3.45 The HRA screening assessment for the Dartmoor Management Plan identified that there will be no likely significant adverse effects – alone or in - combination with other plans or projects. Therefore, no further assessment is required at this stage of plan-making. The HRA considered the strategic nature of the Plan and identified some elements where the need for further HRA may need to be considered again as specific strategies or plans are developed.

4.0 HRA SUMMARY & NEXT STEPS

Summary

4.1 This report presents the methods used and the findings arising from the HRA Screening of the draft Dartmoor Management Plan. The HRA has been undertaken in accordance with extant guidance, good practice and taken into account the implications from recent CJEU Judgments on HRA screening and the application of mitigation measures. Three European sites within the Dartmoor National Park boundary and two estuarial sites outside the National Park were considered within the HRA screening.

4.2 The HRA screening identified that due to the strategic nature of the Management Plan, and the limited potential environmental pathways for impacts to the European sites outside of the National Park, there were no identified adverse Likely Significant Effects (LSEs) for air quality changes, recreational disturbance, changes to water quality or levels, or habitat loss/fragmentation – alone or in-combination with other plans, specifically the Plymouth & SWJLP and the emerging GESP.

4.3 Overall, it is considered that the draft Dartmoor National Park Management Plan is not likely to have any significant adverse effects on the integrity of the identified European sites – alone or in-combination with other plans or projects. The Management Plan is an aspirational plan that sets a strategic framework for development of more specific strategies, plans and actions; at this strategic stage there is insufficient information or locational specificity to assess the effects on the European sites. As specific projects or plans are developed, there may be a need to consider further HRA.

Next Steps

4.4 The HRA Regulations require that the planning authority should carry out formal consultation with the environmental bodies, in this case Natural England and the Environment Agency. Any comments received on this HRA Report will be taken into consideration in the finalisation and adoption of the Management Plan.

APPENDIX 1: EUROPEAN SITE CHARACTERISATIONS

Dartmoor Management Plan Review 2020-2025
HRA Report: 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[30]) ▪ 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

[30] Inside threats relate to changes from Inside the Natura 2000 site, outside changes relate to changes outside of the Natura 2000 site boundary

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[31]) Other Vulnerabilities and affected features: ▪ Grazing levels- Features affected: Lower plants, Dry heaths ▪ Recreational pressure- Features affected: Whole site

[31] Inside threats relate to changes from Inside the Natura 2000 site, outside changes relate to changes outside of the Natura 2000 site boundary

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 has been recently updated by Natural England with supplementary advice for the conservation objectives[32]. 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. Recent Supplementary Advice[33] from NE confirms that the landscape around the SAC sites is essential for the bats for foraging and other behaviours.
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

[32] http://publications.naturalengland.org.uk/publication/6279422093033472

[33] Ibid

Site Name: South Hams **Grid Reference: SX942565** **JNCC Site Code: UK0012650** **Size: 126.87ha** **Designation: SAC**	**Habitats Regulations Assessment: Data Proforma**
	▪ Vegetated seas cliffs of the Atlantic and Baltic Coasts ▪ Caves not open to the public ▪ *Tilio-Acerion* forests of slopes, screes and ravines Annex II Species that are primary reason for selection of the site: ▪ Greater horseshoe bat ▪ *Updated in November 2018 & with supplementary advice in March 2019:* ▪ Vegetated sea cliffs of the Atlantic and Baltic coasts H4030 ▪ European dry heaths ▪ Semi-natural dry grasslands and scrubland facies: on calcareous substrates (Festuco Brometalia) ▪ Caves not open to the public ▪ Tilio-Acerion forests of slopes, screes and ravines; Mixed woodland on base-rich soils associated with rocky slopes (* priority habitat) ▪ Rhinolophus ferrumequinum; 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

Site Name: South Hams **Grid Reference: SX942565** **JNCC Site Code: UK0012650** **Size: 126.87ha** **Designation: SAC**	**Habitats Regulations Assessment: Data Proforma**
	NE updated these Conservation Objectives for the South Hams SAC in November 2018 and provided Supplementary Advice in March 2019[34], key changes as follows: ▪ Population targets for both maternity and hibernation attributes for greater horseshoe bat have been updated ▪ the use of transitional roosts has been recognised and reference to swarming activity has been removed ▪ a 'Supporting off-site (foraging areas)' attribute has been added ▪ and text has been amended to acknowledge the use of buildings for hibernation.
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[35]) ▪ 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

[34] http://publications.naturalengland.org.uk/publication/6279422093033472
[35] Inside threats relate to changes from Inside the Natura 2000 site, outside changes relate to changes outside of the Natura 2000 site boundary

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 tetralix* Annex 1 habitats that are a qualifying feature but not primary reason for site selection ▪ Northern Atlantic wet heaths with *Erica tetralix* 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 ▪ The distribution of qualifying species within the site

Site Name: Culm Grasslands **Grid Reference: SS843214** **JNCC Site Code: UK0012679** **Size: 774.21ha** **Designation: SAC**	**Habitats Regulations Assessment: Data Proforma**
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[36]) ▪ 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

[36] Inside threats relate to changes from Inside the Natura 2000 site, outside changes relate to changes outside of the Natura 2000 site boundary

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 totaling 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[37]) ▪ 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

[37] Inside threats relate to changes from Inside the Natura 2000 site, outside changes relate to changes outside of the Natura 2000 site boundary

Site Name: Dawlish Warren **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 **Grid Reference: SX984792** **JNCC Site Code: UK0030130** **Size: 58.69ha** **Designation: SAC**	**Habitats Regulations Assessment: Data Proforma**
	▪ Modification of cultivation practices- (Threats from inside[38]) ▪ 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)

[38] Inside threats relate to changes from Inside the Natura 2000 site, outside changes relate to changes outside of the Natura 2000 site boundary

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[39] ▪ 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

[39] Inside threats relate to changes from Inside the Natura 2000 site, outside changes relate to changes outside of the Natura 2000 site boundary

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:

Site Name: Exe Estuary **Grid Reference: UK9010081** **JNCC Site Code: UK9010081** **Size: 2345.71ha** **Designation: SPA**	**Habitats Regulations Assessment: Data Proforma**
	▪ Modification of cultivation practices- (Threats from inside[40]) ▪ 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)

[40] Inside threats relate to changes from Inside the Natura 2000 site, outside changes relate to changes outside of the Natura 2000 site boundary

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)