

HABITATS REGULATIONS ASSESSMENT

Fylde Local Plan to 2032: Publication Local Plan Screening
Report

AUGUST 2016

CONTACTS

LIZ TURLEY
Senior Ecologist

Arcadis.
The Mill
Brimscombe Port
Stroud
GL5 2QG
United Kingdom

hABITATS REGULATIONS ASSESSMENT

Fylde Local Plan to 2032: Publication Local Plan Screening Report

Author Michelle Robertson/ Liz Turley

Checker Samantha Walters

Approver Stuart Lowther/David Hourd

Report No 011-UA004283-EEC-03-F

Date AUGUST 2016

VERSION CONTROL

Version	Date	Author	Changes
V1	November 2015	Liz Turley	First draft to Fylde Council and Natural England
V2	July 2016	Liz Turley	Changes based on consultation with Fylde Council and Natural England
V3	August 2016	Jo Weaver	Fylde Council comments addressed

This report dated 08 August 2016 has been prepared for Fylde Council (the "Client") in accordance with the terms and conditions of appointment dated 29 June 2015 (the "Appointment") between the Client and **Arcadis Consulting (UK) Limited** ("Arcadis") for the purposes specified in the Appointment. For avoidance of doubt, no other person(s) may use or rely upon this report or its contents, and Arcadis accepts no responsibility for any such use or reliance thereon by any other third party.

ABBREVIATIONS

BHS	Biological Heritage Site
cSAC	Candidate Special Area of Conservation
DPD	Development Plan Documents
FCS	Favourable Conservation Status
GIS	Geographic Information System
HRA	Habitats Regulations Assessment
IRZ	Impact Risk Zone
LSE	Likely Significant Effect
NE	Natural England
OS	Ordnance Survey
pSPA	Potential Special Protection Area
SAC	Special Area of Conservation
SCI	Sites of Community Importance
SEA	Strategic Environmental Assessment
SPA	Special Protection Area
WeBS	Wetland Bird Surveys

CONTENTS

1	INTRODUCTION AND PURPOSE OF THIS REPORT	1
1.1	Introduction	1
1.2	Purpose of this report	1
1.3	Background to Habitat Regulations Assessment	1
1.4	Legislation and Guidance	2
2	INTRODUCTION TO THE LOCAL PLAN	3
2.1	Background and Purpose	3
2.2	Consultation	3
2.3	Strategic Objectives	5
2.4	Strategic Locations for Development	5
2.5	Non-Strategic Locations for Development	5
2.6	Local Plan Policies	5
2.7	Policies within Fylde Local Plan	6
3	THE HABITAT REGULATIONS ASSESSMENT PROCESS	8
3.1	Stages in HRA	8
3.2	Approach to Screening	8
3.3	In-Combination Effects	8
3.4	Consideration of Effects	11
3.5	Potential Impact Pathways	13
4	IDENTIFYING THE EUROPEAN SITES	15
4.1	Approach to Identifying Sites	15
4.2	European Sites within Fylde	15
4.3	European Sites Outside of Fylde	15
4.4	Conservation Objectives of the European Sites	20
5	SCREENING	22
5.1	Context	22
5.2	Screening Approach taken for the Local Plan	22
5.3	Initial Screening of the Local Plan Policies	22
6	DETAILED SCREENING OF THE FYLDE LOCAL PLAN POLICIES AND SITES	28
6.2	Potential Impacts	28
6.3	Embedded Avoidance and Mitigation	30

6.4	Further Assessment of Fylde Local Plan Policies	30
6.5	Further Assessment of Fylde Local Plan Sites	34
6.6	Screening Summary	44
6.7	In-Combination Effects	45
6.8	Other Plans and projects	46
7	CONCLUSION	50
	APPENDIX A	51
	APPENDIX B	64
	APPENDIX C	77
	APPENDIX D	86

1 Introduction and purpose of this report

1.1 Introduction

- 1.1.1 This Screening Report has been prepared by Arcadis Consulting UK (Ltd) (previously Hyder Consulting) on behalf of Fylde Council as part of the statutory Habitats Regulations Assessment (HRA) of the Fylde Local Plan to 2032: Publication Local Plan (hereafter referred to as the Fylde Local Plan or the Plan).
- 1.1.2 Future development within Fylde up to 2032 will be guided by the plans and policies within the Fylde Local Plan. The Fylde Local Plan will supersede the adopted Fylde Borough Local Plan (as altered) October 2005.

1.2 Purpose of this report

- 1.2.1 This report is the first stage in the HRA process, commonly referred to as Screening. It identifies whether or not the Fylde Local Plan is likely to result in significant effects upon one or more European sites, either alone or in-combination with other plans or programmes and subsequently whether or not an Appropriate Assessment will be required. Further details on the HRA stages are provided in Section 3.

1.3 Background to Habitat Regulations Assessment

- 1.3.1 Under Article 6 of the Habitats Directive, an assessment is required where a plan or project may give rise to significant effects upon any Natura 2000 sites (also known as 'European sites'). Within Fylde there are four European sites; however, it is considered there are also a further five sites which form part of the Natura 2000 network that could potentially be affected by the Fylde Local Plan.
- 1.3.2 Natura 2000 is a network of areas designated to conserve natural habitats and species that are rare, endangered, vulnerable or endemic within the European Community. This includes Special Areas of Conservation (SACs), designated under the Habitats Directive for their habitats and/or species of European importance, and Special Protection Areas (SPAs), classified under Directive 2009/147/EC on the Conservation of Wild Birds (the codified version of Directive 79/409/EEC as amended) for rare, vulnerable and regularly occurring migratory bird species and internationally important wetlands.
- 1.3.3 In addition, it is a matter of law that candidate SACs (cSACs) and Sites of Community Importance (SCI) are considered in this process; furthermore, it is Government Policy that sites designated under the 1971 Ramsar Convention for their internationally important wetlands (Ramsar sites) and potential SPAs (pSPAs) are also considered.
- 1.3.4 The requirements of the Habitats Directive are transposed into English and Welsh law by means of the Conservation of Habitats and Species (Amendment) Regulations 2010¹, as amended.

Paragraph 3, Article 6 of the Habitats Directive states that:

'Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject to paragraph 4 (see below), the competent national authority shall agree to the plan or project only having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public.'

Paragraph 4, Article 6 of the Habitats Directive states that:

'If, in spite of a negative assessment of the implications for the site and in the absence of alternative solutions, a plan or project must nevertheless be carried out for imperative reasons of overriding public interest, including those of social or economic nature, the Member State shall take all compensatory measures to ensure that the overall coherence of Natura 2000 is protected. It shall inform the Commission of the compensatory measures adopted.'

¹ SI 2010/490: Explanatory memorandum to the conservation of habitats and species regulations 2010.

1.3.5 The overarching aim of HRA is to determine, in view of a site's conservation objectives and qualifying interests, whether a plan, either in isolation and/or in combination with other plans, is likely to have a significant adverse effect on the European site. If the Screening (the first stage of the process, see Section 3 for details) concludes that significant adverse effects are likely, then Appropriate Assessment must be undertaken to determine whether there will be adverse effects on a site's integrity.

1.4 Legislation and Guidance

1.4.1 This HRA screening report has drawn upon the following legislation and guidance:

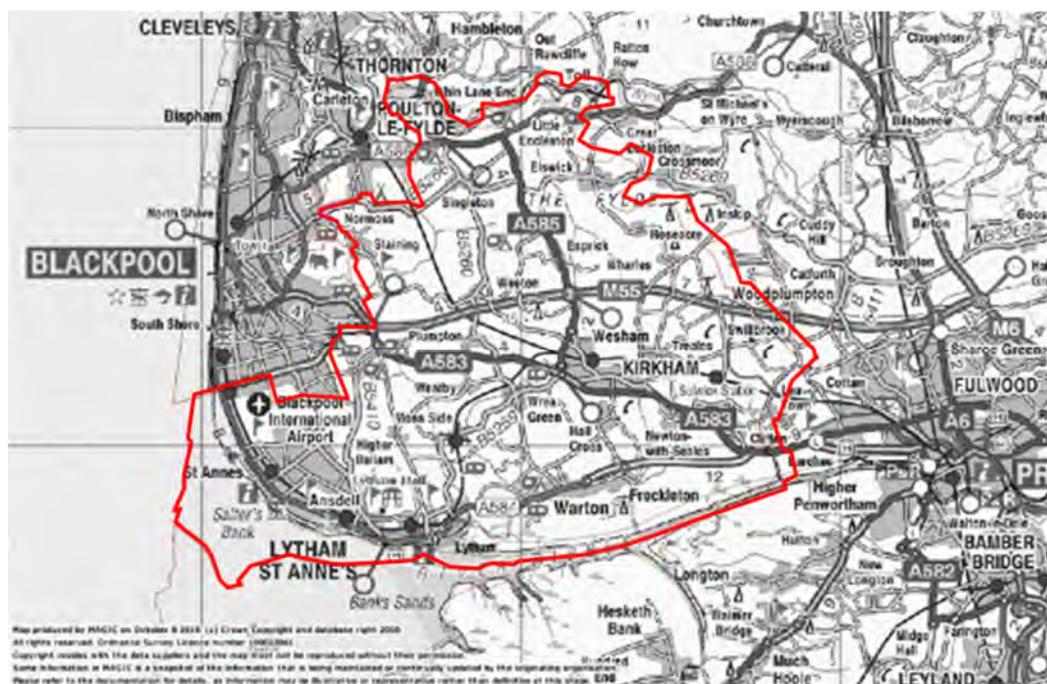
- The Conservation of Habitats and Species Regulations 2010, as amended. In 2012, these Regulations were amended to transpose more clearly certain aspects of the Habitats Directive. No fundamental changes to the Regulations were made.
- European Commission, Managing Natura 2000 sites: The provisions of Article 6 of the Habitats Directive 92/43/EEC.
- European Commission, Guidance document on Article 6(4) of the Habitats Directive 92/43/EEC.
- Department for Communities and Local Government (2006) Planning for the Protection of European Sites: Appropriate Assessment. Guidance for Regional Spatial Strategies and Local Development Documents.
- DTA Publications Limited, The Habitats Regulations Assessment Handbook, accessed online October 2015.

2 Introduction to the Local Plan

2.1 Background and Purpose

2.1.1 Fylde is a predominantly rural Borough occupying the southern part of the Fylde peninsula in western Lancashire. It is bounded to the north by Wyre Borough Council and the River Wyre, to the west by the densely populated urban area of Blackpool and the sea, by Preston City Council to the east and by the Ribble Estuary to the south (Figure 2-1).

Figure 2-1 Map of Fylde Borough



2.1.2 The Fylde Local Plan will provide the locally specific part of the development plan for Fylde, whilst the National Planning Policy Framework (NPPF) provides the national framework against which all development in Fylde will be assessed. Once adopted, the Fylde Local Plan will supersede the adopted Fylde Borough Local Plan (as altered) October 2005.

2.1.3 Future development within Fylde will be guided by the plans and policies within the Fylde Local Plan, which runs from 1 April 2011 to 31 March 2032, to ensure a 15 year plan period from the date of adoption in 2017.

2.2 Consultation

2.2.1 The Local Plan: Part 1 Preferred Option was prepared for consultation for an eight week period running from June to August 2013. The Preferred Option has informed a Revised Preferred Option which was consulted upon in October – December 2015. This has since informed the Publication version of the Fylde Local Plan (on which this HRA Screening Report is based), which includes both strategic and non-strategic sites for new homes and employment land, sites for gypsies, travellers and travelling show people, leisure, retail, tourism and community use, or a mixture of such uses. The Fylde Local Plan also contains Development Management policies, which will inform decisions on planning applications and appeals; together with policies to protect the natural and built environment and heritage assets.

2.2.2 A draft HRA Screening Report (based on the Revised Preferred Option of the Fylde Local Plan) was sent to Fylde Council and Natural England (NE) for comment in November 2015.

2.2.3 Fylde Council incorporated a number of recommendations set out within the draft HRA Screening Report (November 2015) into the current version of the Fylde Local Plan (dated June 2016). In particular,

strengthening policies to include reference to the need for project-level HRA, and the need for developers to consider potential impacts on European Sites through Policy ENV2 (further detail in paragraph 2.2.8). This current HRA Screening Report therefore assesses the Policies and Plans set out within the current version of the Fylde Local Plan (dated June 2016).

- 2.2.4 A consultation response was also received from NE on 1st April 2016 (a copy of which is presented in Appendix D). NE advised that there was currently not sufficient information in the draft HRA Screening Report to conclude no Likely Significant Effect (LSE) on all site allocations, and further assessment would be required. This current HRA Screening Report addresses these issues and sets out a more detailed assessment (refer to Section 6).
- 2.2.5 To validate the screening process and make it more robust NE advised that the following additional sources of information be reviewed:
- *Wetland Bird Surveys (WeBS) records;*
 - *Natural England's Impact Risk Zones (which now includes a new Impact Risk Zone (IRZ) for pink-footed geese;*
 - *Local bird/ ornithological groups/clubs records to assist in the screening in/out of allocations;*
 - *Local Record Centres;*
 - *Relevant survey information from current and recent planning applications; and*
 - *Morecambe Bay Wader Roost Study (acknowledging that this is primarily for Morecambe Bay but provides context and reference to the Ribble).*
- 2.2.6 Further email correspondence with NE confirmed that the additional assessment, in relation to bird data, would only need to be carried out on sites which do not currently have planning permission. All other sites would only need to be included as part of the in-combination effects assessment (if required). Section 6.5 of this report provides details of the additional assessment which has taken place.
- 2.2.7 NE also provided three further comments. These comprised:
1. A series of recommendations in Table 10 that the wording of certain policies should be strengthened to avoid potential impacts from future development on functionally linked land. This includes reference to the need for project level assessment at the development management stage.
- 2.2.8 The draft HRA Screening Report (November, 2015) recommended that project-specific HRAs should be included within the following policies: EC5, EC6, INF1, T1, T2, and CL3. The current version of the Fylde Local Plan (dated June 2016), on which this current version of the HRA Screening is based, comprises additional recommendations for project-specific HRAs to be undertaken within the following policies: EC6 (Leisure, culture and Tourism development), CL3 (Renewable and low carbon energy generation) and ENV1 (Landscape). References to ensuring potentially damaging effects to European Sites are avoided are also included within Policies M1 and ENV2.
2. Where Appropriate Assessment identifies potential adverse effects, the Plan should be clear where there are potential constraints and that further assessment will be needed at the project stage.
- 2.2.9 Table 11 to Table 14 provide further information on the assessment of each strategic and non-strategic site. For sites which do not currently have planning permission, it is a requirement of the Plan for future planning applications to comply with ENV2.
3. Strategic mitigation will need to be built in to the Plan to deal with effects arising from proposed allocations as well as any future development. The scope of the mitigation needs to be presented in the Plan along with an identified mechanism to deliver it. There should also be clear evidence that all alternative sites for the allocations have been explored. In assessing avoidance and mitigation there may be opportunities for cross-boundary solutions with neighbouring authorities.
- 2.2.10 Policies within the Plan have been amended to ensure they include the requirement for project-level HRA (refer to paragraph 2.2.8) to confirm that no significant effects would occur upon European sites and where impacts cannot be avoided to ensure an appropriate level of mitigation or compensation is

provided to off-set the effect and such measures would be secured through planning conditions and/or obligations (refer to Section 6.3). A number of alternative sites for development have been considered throughout the Plan process, details of which are provided within the accompanying Sustainability Appraisal (SA). In terms of the HRA, consideration of alternatives is not considered at the Screening stage. This does not come into consideration until Stage 3 of the assessment i.e. after a Plan goes to Appropriate Assessment and significant effects cannot be mitigated/ compensated, refer to Section 3.1, below.

2.3 Strategic Objectives

2.3.1 In order to achieve the Vision for Fylde, five strategic objectives have been produced. They express the purpose of the Fylde Local Plan and are important as they will be used as a measure of the success of the plan in delivering the Vision.

2.3.2 These objectives are as follows:

Objective 1: To create sustainable communities.

Objective 2: To maintain, improve and enhance the environment.

Objective 3: To make services accessible.

Objective 4: To diversify and grow the local economy.

Objective 5: To develop socially cohesive, safe, diverse and healthy communities.

2.4 Strategic Locations for Development

2.4.1 The Development Strategy within the Local Plan identifies the proposed Settlement Hierarchy and the Strategic and Non-strategic Locations for Development which will accommodate the level of growth in new homes, jobs and associated services, required across Fylde during the entire plan period to 2032. The proposed Settlement Hierarchy by the end of the plan period, is set out in policy S1 and it provides the basis for sustainable communities.

2.4.2 Under Policy DLF1, the Local Plan will deliver a minimum of 7,768 new homes and 62 ha of development land for employment use over the plan period to 31 March 2032.

2.4.3 Four Strategic Locations for Development (employment and housing) have been identified in the Fylde Local Plan. These are:

- Lytham and St Annes.
- Fylde-Blackpool Periphery.
- Warton.
- Kirkham and Wesham.

2.5 Non-Strategic Locations for Development

2.5.1 Non-strategic development sites (between 10 and 99 homes) are situated within the four Strategic Locations for Development. Non-strategic development sites also occur within and on the edge of the Tier 1: Larger Rural Settlements of Newton, Staining and Wrea Green and the Tier 2: Smaller Rural Settlements of Clifton, Elswick, Singleton and Weeton (as defined in the Settlement Hierarchy – Policy S1).

2.6 Local Plan Policies

2.6.1 There are 52 policies contained within the Fylde Local Plan which relate to the Strategic Objectives above. These are set out under the following chapter headings:

- National Policy.
- The Development Strategy.
- Strategic Locations for Development.
- General Development Policies.

- The Fylde Economy.
- Provision of Homes in Fylde.
- Health and Wellbeing.
- Infrastructure, Service Provision and Transport.
- Water Resource Management, Flood Risk and Addressing Climate Change.
- Conserving and Enhancing the Natural, Historic and Built Environment.

2.7 Policies within Fylde Local Plan

2.7.1 The policies within the Fylde Local Plan (2016) are listed below:

National Policy

Policy NP1- Presumption in favour of sustainable development

The Development Strategy

Policy S1 – The proposed settlement hierarchy

Policy DLF1- Development locations for Fylde.

Strategic Locations for Development

Policy M1 Masterplanning the strategic locations for development

Policy SL1 Lytham and St Annes Strategic location for development

Policy SL2 The Fylde-Blackpool periphery strategic location for development

Policy SL3 Warton strategic location for development

Policy SL4 Kirkham and Wesham strategic location for development

Policy SL5 Development sites outside the strategic locations for development

General Development Policies

GD1: Settlement boundaries

GD2: Green belt

GD3: Areas of separation

GD4: Development in the countryside

GD5: Large developed sites in the countryside

GD6: Promoting mixed use development

GD7: Achieving good design in development

GD8: Demonstrating viability

GD9: Contaminated land

The Fylde Economy

EC1: Overall provision of employment land and existing employment sites

EC2: Employment opportunities

EC3: Lancashire advanced engineering and manufacturing (AEM) enterprise zone at BAE Systems, Warton

EC4: Blackpool Airport Enterprise Zone

EC5: Vibrant town, district and local centres

EC6: Leisure, culture and tourism development

EC7: Tourism accommodation

Provision of Homes in Fylde

H1: Housing delivery and the allocation of housing land

H2: Density and mix of new residential development

H3: Conversions and change of use to residential

H4: Affordable housing

H5: Gypsies, travellers and travelling show people's sites

H6: Isolated new homes in the countryside

H7: Replacements of, and extensions to, existing homes in the countryside

Health and Wellbeing

HW1: Health and wellbeing

HW2: Community facilities

HW3: Provision of indoor and outdoor sports facilities

HW4: Contaminated land

Infrastructure, Service Provision and Transport

INF1: Services accessibility and infrastructure

INF2: Developer contributions

T1: Strategic highway improvements

T2: Warton Aerodrome

T3: Blackpool Airport

T4: Enhancing sustainable transport choice

T5: Parking standards

Water Resource Management, Flood Risk and Addressing Climate Change

CL1: Flood alleviation, water quality and water efficiency

CL2: Surface water run-off and sustainable drainage

CL3: Renewable and low carbon energy generation

CL4: Decentralised energy networks and district heating systems

Conserving and Enhancing the Natural, Historic and Built Environment

ENV1: Landscape

ENV2: Biodiversity

ENV3: Protecting existing open space (the green infrastructure network)

ENV4: Provision of New Open Space (the green infrastructure network)

ENV5: Historic environment

3 The Habitat Regulations Assessment Process

3.1 Stages in HRA

3.1.1 This section provides an outline of the stages involved in HRA and the specific methods that have been used in preparing this report.

3.1.2 The requirements of the Habitats Regulations Assessment comprise four distinct stages:

1. **Screening** is the process which initially identifies the likely impacts upon a European site of a project or plan, either alone or in-combination with other projects or plans, and considers whether these impacts may have a significant effect on the integrity of the site's qualifying habitats and/or species. It is important to note that the burden of evidence is to show, on the basis of objective information, that there will be no significant effect; if the effect may be significant, or is not known, that would trigger the need for an Appropriate Assessment. There is European Court of Justice case law to the effect that unless the likelihood of a significant effect can be ruled out on the basis of objective information, and adopting the precautionary principle, then an Appropriate Assessment must be made.
2. **Appropriate Assessment** is the detailed consideration of the impact on the integrity of the European site of the project or plan, either alone or in combination with other projects or plans, with respect to the site's conservation objectives and its structure and function. This is to determine whether or not there will be adverse effects on the integrity of the site. This stage also includes the development of mitigation measures to avoid or reduce any possible impacts.
3. **Assessment of alternative solutions** is the process which examines alternative ways of achieving the objectives of the project or plan that would avoid adverse impacts on the integrity of the European site, should avoidance or mitigation measures be unable to cancel out adverse effects.
4. **Assessment where no alternative solutions exist and where adverse impacts remain.** At Stage 4, an assessment is made with regard to whether or not the development is necessary for imperative reasons of overriding public interest (IROPI). If it is, this stage also involves detailed assessment of the compensatory measures needed to protect and maintain the overall coherence of the Natura 2000 network

3.2 Approach to Screening

3.2.1 This Screening Report takes into account the requirements of the Habitats Regulations and relevant guidance produced by David Tyldesley Associates².

The following stages have been completed:

- Identification of all European sites potentially affected (including those outside of the Fylde Local Plan area);
- A review of each site, including the features for which the site is designated, the Conservation Objectives, and an understanding of the current conservation status and the vulnerability of the individual features to threats;
- A review of the policies which have the potential to affect the European sites, and whether the sites are vulnerable to these effects (this has included a categorisation of the potential effects of the Policy, in line with current guidance);
- A consideration of any impacts in-combination with other plans or projects;
- Where potential effects are identified, avoidance or mitigation measures have been considered in order to avoid significant effects.

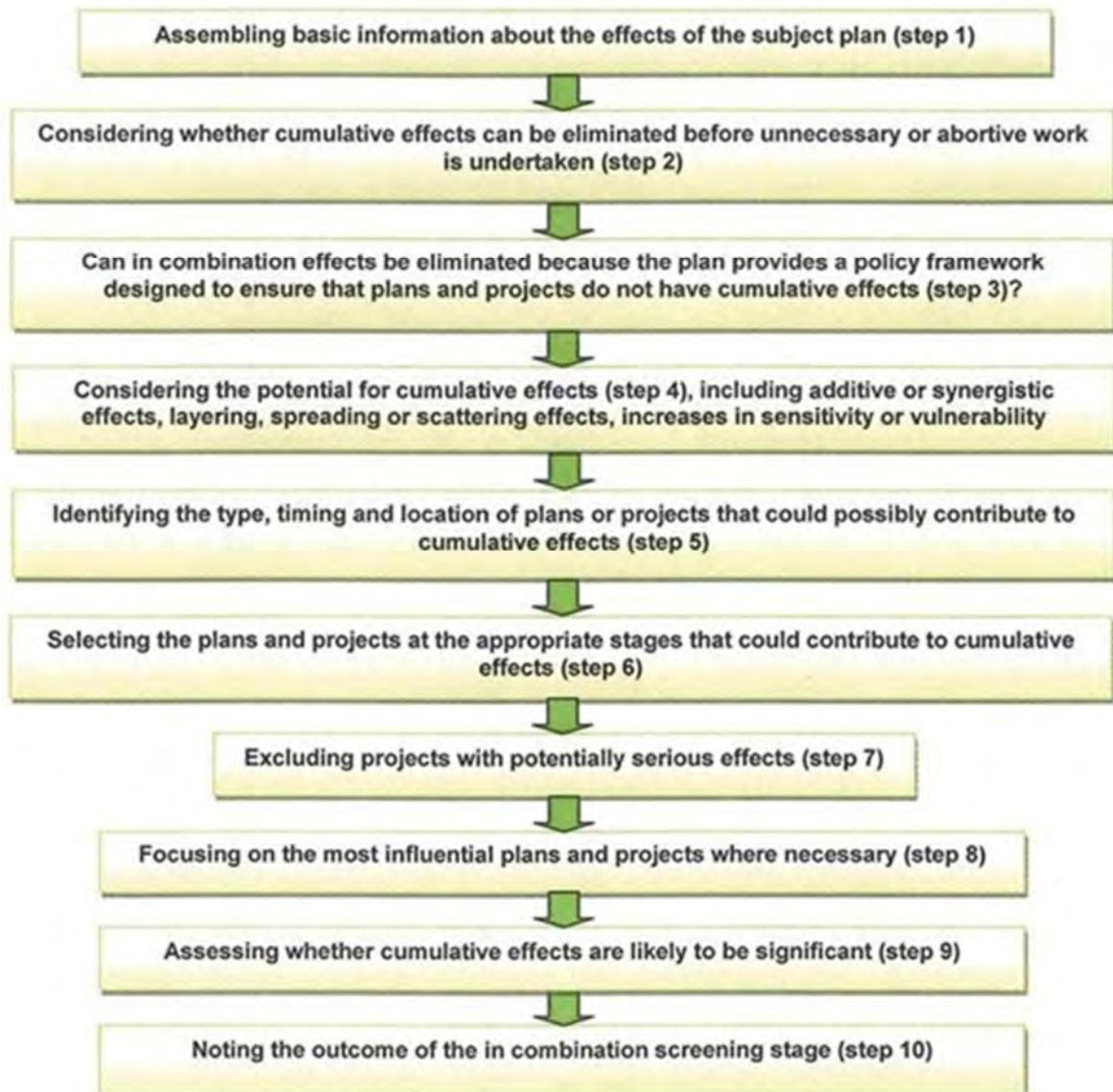
3.3 In-Combination Effects

3.3.1 As outlined in Section 3.1, it is necessary for HRA to consider in-combination effects with other plans and projects.

² DTA Publications Limited The Habitats Regulations Assessment Handbook, accessed online October 2015.

3.3.2 Where an aspect of a plan could have some effect on the qualifying feature(s) of a European site, but the effects of that aspect of the plan alone would not be significant, the effects of that aspect of the plan will need to be checked in-combination firstly, with other effects of the same plan, and then with the effects of other plans and projects.

3.3.3 The flow chart below is taken from DTA Publications Limited, The Habitats Regulations Assessment Handbook (accessed online October 2015), and illustrates the outline methodology for the in-combination assessment.



3.3.4 If the prospect of cumulative effects cannot be eliminated in steps 2 and 3 in the figure above, it is necessary to consider how the addition of effects from other plans or projects may produce a combined adverse effect on a European site that would be significant. Taking the effects which would not be likely to be significant alone, it is necessary to make a judgement as to whether these effects would be made more likely or more significant if the effects of other plans or projects are added to them. Most cumulative effects can be identified by way of the following characteristics. Could additional effects be cumulative because they would:

- a. Increase the effects on the qualifying features affected by the subject plan in an additive, or synergistic way
- b. Increase the sensitivity or vulnerability of the qualifying features of the site affected by the subject plan?
- c. Be felt more intensely by the same qualifying features over the same area (a layering effect), or by the same qualifying feature over a greater (larger) area (a spreading effect), or by affecting new areas of the same qualifying feature (a scattering effect)?

3.3.5 It will be necessary to look for plans or projects at the following stages:

- a. Applications lodged but not yet determined.
- b. Projects subject to periodic review e.g. annual licences, during the time that their renewal is under consideration.
- c. Refusals subject to appeal procedures and not yet determined.
- d. Projects authorised but not yet started.
- e. Projects started but not yet completed.
- f. Known projects that do not require external authorisation.
- g. Proposals in adopted plans.
- h. Proposals in finalised draft plans formally published or submitted for final consultation, examination or adoption.

3.3.6 Consideration of in-combination effects is included in Section 6.5.

3.3.7 Plans under consideration may range from neighbouring authorities' planning documents down to sector-specific strategic plans on such topics as flood risk. A review has been undertaken of plans and projects with the potential for an in-combination effect with the Fylde Local Plan, and these are listed in Table 1.

Table 1: Plans and Projects considered to potentially contribute to In-Combination Effects

Authority	Relevant Plan/Project
Blackpool Council	<p>Blackpool Local Plan Part 1: Core Strategy 4,200 dwellings to 2027. Also 182.1 ha of employment land to 2027</p> <p>Proposed Enterprise Zone at Blackpool Airport boundary, includes 144 ha, 55 ha are already developed and 89 ha are available for development. 3000 jobs over 20 years.</p> <p>Proposed extension of the Blackpool Tramway from the promenade at North Pier to Blackpool North railway station which will improve access to the UK national rail network from Blackpool, Fleetwood and Cleveleys.</p> <p>Fylde Highways and Transport Masterplan</p>
Wyre Council	<p>Wyre Local Plan Issues and Options (three options included in the plan, but the amount of housing/employment etc. not set out in detail). Objectively Assessed Need for 340-485 dwellings per annum (Strategic housing market assessment - SHMA 2014).</p> <p>Safeguarding the line of the M55 Norcross Link (Blue Route) implementation through the Highways England.</p> <p>A585 Skippool – Windy Harbour Improvements commence 2019 open 2021 (Issues and Options 2015, Preferred Option 2016, Development Consent Order 2017), commence 2019/20, open 2021/22.</p> <p>Hillhouse Chemicals and Energy.</p> <p>Fylde Highways and Transport Masterplan</p>

Authority	Relevant Plan/Project
Lancaster City Council	People, Homes, Jobs – how should we plan for the districts future? 13,000 – 14,000 new homes between 2011- 2031. Heysham to M6 Link (under construction) Lancaster District Highways and Transport Masterplan
Preston City Council	Total requirement of 8,637 dwellings from 2014 – 2026. 2,837 will be delivered after 2026. 99.52 ha of employment land, 2.1 ha at North West Preston Junction 2 on M55 plus Preston Western Distributor Road (commence 2017 open 2019) Cottam Parkway Railway Station accessed off Preston Western Distributor open 2022/23. Broughton Bypass (Under construction).
West Lancashire District Council	The Local Plan 2012- 2027 identifies a need for 4,860 new dwellings and 75ha of employment land.
South Ribble Council	Duelling the A582 from Penwortham to Farington Completion of Penwortham By Pass
Sefton Council	A total requirement for 11,070 dwellings from 2012-2030 plus 84.5ha of employment land.
Lancashire County Council	Lancashire Minerals and Waste Local Plan Site Allocations and Development Management Policies Local Plan DPD adopted 2013
Dong Energy	Walney Offshore Wind Farm - active Walney Extension – under construction West of Duddon Sands Offshore Wind –active
National Grid - North West Coastal Connections	Construction of a new nuclear power station at Sellafield. Power will be transmitted via a crossing under Morecambe Bay to the new Middleton substation at Heysham, Lancashire.

3.4 Consideration of Effects

Definition of Significant Effects

- 3.4.1 A critical part of the HRA screening process is determining whether or not the proposals are likely to have a significant effect on European Sites and, therefore, if they will require an Appropriate Assessment. Judgements regarding significance should be made in relation to the qualifying interests for which the site is of European importance and also its conservation objectives. A useful definition of 'likely' significant effects is as follows:

'...likely means readily foreseeable not merely a fanciful possibility; significant means not trivial or inconsequential but an effect that is potentially relevant to the site's conservation objectives³'.

³ Welsh Assembly Government Annex to Technical Advice Note 5: Nature conservation and planning. The Assessment of Development Plans in Wales Under the Provision of The Habitats Regulations' (October 2006).

3.4.2 In considering whether the plan is likely to have a significant effect on a European site, a precautionary approach must be adopted:

- The plan should be considered ‘likely’ to have such an effect if the plan making authority is unable (on the basis of objective information) to exclude the possibility that the plan could have significant effects on any European site, either alone or in combination with other plans or projects.
- An effect will be ‘significant’ in this context if it could undermine the site’s conservation objectives. The assessment of that risk must be made in the light of factors such as the characteristics and specific environmental conditions of the European site in question.

Categorising Effects

3.4.3 All elements of the Fylde Local Plan, have been screened for likely significant effects on European sites and categorised in accordance with DTA Publications Limited The Habitats Regulations Assessment Handbook (accessed online October 2015).

3.4.4 The effects associated with the Fylde Local Plan can be allocated into one of 12 categories according to the ways in which the option, policy or proposal could affect the European site. These are described in Table 2 below.

Table 2: Screening Assessment Categories

Category	Description
Category A:	General statements of policy/general aspirations. Policies which are no more than general statements of policy or general political aspirations should be screened out because they cannot have a significant effect on a site.
Category B:	Policies listing general criteria for testing the acceptability/sustainability of proposals. These general policies cannot have any effect on a European site and should be screened out.
Category C:	Proposal referred to but not proposed by the plan. Screen out any references to specific proposals for projects, such as those which are identified, for example, in higher policy frameworks such as the Wales Spatial Plan or National Policy Statements, relating perhaps to nationally significant infrastructure projects. These will be assessed by the Secretary of State or Welsh Ministers. A useful ‘test’ as to whether a project should be screened out in this step is to ask the question: ‘Is the project provided for/proposed as part of another plan or programme and would it be likely to proceed under the other plan or programme irrespective of whether this subject plan is adopted with or without reference to it?’ If the answer is ‘yes’ it will normally be appropriate to screen the project out in this step.
Category D:	Environmental protection/site safeguarding policies. These are policies, the obvious purpose of which is to protect the natural environment, including biodiversity, or to conserve or enhance the natural, built or historic environment, where enhancement measures will not be likely to have any adverse effect on a European Site. They can be screened out because the implementation of the policies is likely to protect rather than adversely affect European sites and not undermine their conservation objectives.
Category E:	Policies or proposals that steer change in such a way as to protect European sites from adverse effects. These types of policies or proposals will have the effect of steering change away from European sites whose qualifying features may be affected by the change and they can therefore be screened out.

Category	Description
Category F:	Policies or proposals that cannot lead to development or other change. Policies that do not themselves lead to development or other change, for example, because they relate to design or other qualitative criteria for development, such as materials for new development. They do not trigger any development or other changes that could affect a European site and can be screened out.
Category G:	Policies or proposals that could not have any conceivable adverse effect on a site. Policies which make provision for change but which could have no conceivable effect on a European site, because there is no causal connection or link between them and the qualifying features of any European site, and can therefore be screened out.
Category H:	Policies or proposals the (actual or theoretical) effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects). Policies or proposals which make provision for change but which could have no significant effect on a European site, either alone or in combination with other aspects of the same plan, or in combination with other plans or projects, can be screened out. These may include cases where there are some potential effects which (and theoretically even in combination) would plainly be insignificant and could not undermine the conservation objectives.
Category I:	Policies or proposals with a likely significant effect on a site alone. Policies or proposals which are likely to have a significant effect on a European site alone, should be screened in.
Category J:	Policies or proposals not likely to have a significant effect alone. These aspects of the plan would have some effect on a site, but the effect would not be likely to be a significant effect; so they must be checked for in-combination (cumulative) effects. They will then be re-categorised as either Category K (no significant effect in combination) or Category L (likely to have a significant effect in-combination), as explained below.
Categories K and L:	Policies or proposals not likely to have a significant effect either alone or in-combination (K) or likely to have a significant effect in-combination (L) after the in-combination test. Where an aspect of a plan could have some effect on the qualifying feature(s) or a European site, but the effects of that aspect of the plan alone would not be significant, the effects of that aspect of the plan will need to be checked in-combination firstly, with other effects of the same plan, and then with the effects of other plans and projects.

3.5 Potential Impact Pathways

3.5.1 During the HRA screening stage, the likely nature, magnitude, frequency, timing, duration, location and spatial extent of changes resulting from implementation of the Local Plan will be assessed. As a part of this, mechanisms through which the Fylde Local Plan could impact upon European sites will be considered. Further details on the potential impact pathways are presented in Section 6.2.

3.5.2 The main impact pathways could be:

- Direct habitat and species loss within European sites.
- Habitat degradation as a result of increased air pollution.
- Loss of habitat functionally linked to a European site (i.e. used by overwintering birds for foraging).
- Disturbance to habitats and species through increased recreational activity, during operational stage
- Changes in water quality where sites are hydrologically linked to European sites.

- Disturbance to species as a result of construction activities/ operational stage.

4 Identifying the European Sites

4.1 Approach to Identifying Sites

- 4.1.1 Fylde is a predominantly rural Borough occupying the southern part of the Fylde peninsula in western Lancashire. It is bound to the north by Wyre Borough Council and the River Wyre estuary to the north, to the west by the densely-populated urban area of Blackpool and the Irish Sea, by Preston City Council to the east and by the Ribble Estuary to the south.
- 4.1.2 There are European sites located within, and on, the Borough boundary which need to be taken into consideration in this assessment. In addition, European sites outside of the Borough may be affected by activities undertaken in Fylde if they are connected through an impact pathway, for example, hydrological links, or, if mobile species (i.e. birds) use land which is functionally linked to a European site, for example for foraging.
- 4.1.3 European sites which may be affected by the Local Plan activities through an identifiable impact pathway have been considered, within a 20 km distance from the Borough boundary.
- 4.1.4 The following approach to identifying European sites to be included within the HRA Screening Report involved:
- 1 Sites within Fylde: Identify all sites within / partially within Fylde; and
 - 2 Sites outside Fylde: Identify the likely impact pathways of the Fylde Local Plan and hence identify whether features of European sites outside of the Borough may be affected by the Fylde Local Plan. Give due consideration to the likely distances that mobile species from other European sites would travel to land within Fylde (or indeed to the distances people from Fylde might be likely to travel to a sensitive site outside the Borough). European sites within 20km of the boundary of Fylde were considered.

4.2 European Sites within Fylde

- 4.2.1 Four European sites have been identified on or within the Fylde Borough boundary. These are listed in Table 3. Figure 4-1 also shows the locations of the European sites.

Table 3: Summary of European Sites within or partially within Fylde

Name of Site	Identification Number	Designation
Morecambe Bay	UK9005081	SPA
Morecambe Bay	UK11045	Ramsar Site
Ribble and Alt Estuaries	UK9005103	SPA
Ribble and Alt Estuaries	UK11057	Ramsar Site

4.3 European Sites Outside of Fylde

Impacts and Effects of the Local Plan

- 4.3.1 The Revised Preferred Option Local Plan was reviewed and, in conjunction with the parallel SA, the following potential impact types, shown in Table 4, were identified that may have some effect on European sites and their qualifying species.

Table 4: Potential Impacts and Effects of the Local Plan on European Sites outside Fylde boundaries

Potential impacts and effects of the Local Plan	European sites and features potentially affected
Increased disturbance of species through increased recreational pressure as a result of population growth within Fylde.	Overwintering / migratory bird populations of Martin Mere SPA/Ramsar. Breeding populations of marsh harrier, merlin and lesser black-backed gull of Bowland Fells SPA.
Degradation of habitat due to increased recreational pressure as a result of population growth.	Coastal habitats (particularly sand dunes) of Sefton SAC and Morecambe Bay SAC.
Impacts on European sites outside the Borough boundary as a result of changes in air quality from increased traffic and development.	Blanket bog habitats that support the bird population of Bowland Fells SPA.
Direct loss of habitat within Fylde that is functionally linked to a European site outside the Fylde boundary.	Agricultural land used by foraging pink-footed geese, a feature of Martin Mere SPA, Ramsar.
Adverse impact on water quality through pollution of watercourses linked to European sites, by an increase in the number of potential pollution sources in Fylde.	Sefton Coast SAC and Morecambe Bay SAC have both been identified as being hydrologically linked to watercourses within Fylde.
Impacts on groundwater on those European sites that are hydrogeologically linked to aquifers under Fylde, for example through increased water abstraction as a result of development.	A review of aquifers has been undertaken. Much of Fylde is underlain by a Secondary B Aquifer; however, the east of the Borough is underlain by a Principal Aquifer. These are permeable layers capable of supporting water supplies at a local rather than strategic scale, in some cases forming an important source of base flow to rivers or otherwise yielding limited groundwater. Martin Mere SPA/Ramsar is underlain by the same broad aquifer.

Sites outside of Fylde identified due to mobile species

4.3.2 The mobile species listed in Table 5 are qualifying features of European designated sites outside of Fylde and have been identified as potentially using (non-designated) land within Fylde that could be affected by the Fylde Local Plan or use watercourses or areas downstream of Fylde which may be affected by hydrogeological changes.

Table 5: Relationship between mobile species and European Sites in Fylde and surrounding areas

Species	Relevant information about distribution	European sites supporting this species in and surrounding Fylde	Reason for inclusion or otherwise
Little tern	A strictly coastal species found around the UK coastline at suitable breeding beaches.	Morecambe Bay SPA within Fylde.	Morecambe Bay SPA is already included.
Herring Gull	Resident bird, found in habitats around coasts and inland around rubbish tips, fields, large reservoirs and lakes.	Morecambe Bay SPA and Ramsar site in Fylde	Morecambe Bay SPA and Ramsar site are already included.

Species	Relevant information about distribution	European sites supporting this species in and surrounding Fylde	Reason for inclusion or otherwise
Lesser Black-backed Gull	Resident bird, found on coastlines in summer and on some inland high moors.	Morecambe Bay SPA / Ramsar site and Ribble and Alt Estuaries SPA / Ramsar site all within Fylde. Bowland Fells SPA outside the Borough boundary.	Morecambe Bay SPA and Ramsar site and Ribble and Alt Estuaries SPA and Ramsar site are already included. Feature for which the Bowland Fells SPA has been designated, have potential to use land within Fylde.
Ringed Plover	Largely resident bird, that breeds on beaches around the coast, but has also now been recorded breeding inland in sand and gravel pits and former industrial sites. Nests on the ground in open areas with little or no plant growth.	Morecambe Bay SPA / Ramsar site and Ribble and Alt Estuaries SPA / Ramsar site all within Fylde.	Morecambe Bay SPA and Ramsar site and Ribble and Alt Estuaries SPA and Ramsar site are already included.
Golden Plover	Lowland fields.	Morecambe Bay SPA / Ramsar site and Ribble and Alt Estuaries SPA / Ramsar site all within Fylde.	Morecambe Bay SPA and Ramsar site and Ribble and Alt Estuaries SPA and Ramsar site are already included.
Sanderling	Largely a winter visitor and passage migrant. Habitats include long, sandy beaches on the coast.	Morecambe Bay SPA / Ramsar site and Ribble and Alt Estuaries SPA / Ramsar site all within Fylde.	Morecambe Bay SPA and Ramsar site and Ribble and Alt Estuaries SPA and Ramsar site are already included.
Curlew	Winter occurrence in coastal areas.	Morecambe Bay SPA and Ramsar site within Fylde.	Morecambe Bay SPA and Ramsar site are already included.
Dunlin	Coastal areas.	Morecambe Bay SPA / Ramsar site and Ribble and Alt Estuaries SPA / Ramsar site all within Fylde.	Morecambe Bay SPA and Ramsar site and Ribble and Alt Estuaries SPA and Ramsar site are already included.
Grey Plover	Found only along coasts, preferring large muddy and sandy estuaries.	Morecambe Bay SPA / Ramsar site and Ribble and Alt Estuaries SPA / Ramsar site all within Fylde.	Morecambe Bay SPA and Ramsar site and Ribble and Alt Estuaries SPA and Ramsar site are already included.
Knot	Many knots use UK estuaries as feeding grounds in winter, and therefore the population is vulnerable to any changes such as barrages, sea-level rises and human disturbance. Large numbers of birds visit the UK in winter from their Arctic breeding grounds.	Morecambe Bay SPA / Ramsar site and Ribble and Alt Estuaries SPA / Ramsar site all within Fylde.	Morecambe Bay SPA and Ramsar site and Ribble and Alt Estuaries SPA and Ramsar site are already included.

Species	Relevant information about distribution	European sites supporting this species in and surrounding Fylde	Reason for inclusion or otherwise
Sandwich Tern	Coastal habitats – i.e. sandy seacoasts. Breed in dense colonies on coasts and islands and inland on suitable large freshwater lakes close to the coast,	Morecambe Bay SPA and Ramsar site within Fylde.	Morecambe Bay SPA and Ramsar site are already included.
Pink-footed Goose	Large numbers of birds spend the winter in the UK on large estuaries or on surrounding farmland where birds go in the day to feed.	Morecambe Bay SPA / Ramsar site and Ribble and Alt Estuaries SPA / Ramsar site all within Fylde. Martin Mere SPA and Ramsar site outside of Fylde.	Features for which the Martin Mere SPA and Ramsar is designated, have potential to use land within Fylde.
Pintail	Pintails occur on sheltered coasts and estuaries over winter.	Morecambe Bay SPA / Ramsar site and Ribble and Alt Estuaries SPA / Ramsar site all within Fylde. Martin Mere SPA and Ramsar site outside of Fylde.	Features for which the Martin Mere SPA and Ramsar is designated, have potential to use land within Fylde.
Redshank	During winter largely seen on estuaries and coastal lagoons.	Morecambe Bay SPA / Ramsar site and Ribble and Alt Estuaries SPA / Ramsar site all within Fylde.	Morecambe Bay SPA and Ramsar site and Ribble and Alt Estuaries SPA and Ramsar site are already included.
Shelduck	Common around coastlines where it frequents salt marshes and estuaries. Can also be found around inland waters such as reservoirs and gravel workings.	Morecambe Bay SPA / Ramsar site and Ribble and Alt Estuaries SPA / Ramsar site all within Fylde.	Morecambe Bay SPA and Ramsar site and Ribble and Alt Estuaries SPA and Ramsar site are already included.
Turnstone	Found all around the UK coastline. Likes rocky shores as well as sandy and muddy ones. Particularly likes feeding on rocks covered with seaweed, and will feed along seawalls and jetties.	Morecambe Bay SPA and Ramsar site within Fylde.	Morecambe Bay SPA and Ramsar site are already included.
Great cormorant	Found around the UK coastline on rocky shores, coastal lagoons and estuaries, it is increasingly being seen inland at reservoirs, lakes and gravel pits.	Morecambe Bay Ramsar site within Fylde.	Morecambe Bay Ramsar site is included.
Common eider	Coastal areas.	Morecambe Bay Ramsar site within Fylde.	Morecambe Bay Ramsar site is included.

Species	Relevant information about distribution	European sites supporting this species in and surrounding Fylde	Reason for inclusion or otherwise
Oystercatcher	Most UK birds spend the winter on the coast.	Morecambe Bay SPA / Ramsar site and Ribble and Alt Estuaries SPA / Ramsar site all within Fylde.	Morecambe Bay SPA and Ramsar site and Ribble and Alt Estuaries SPA and Ramsar site are already included.
Great crested grebe	Found along coasts in winter.	Morecambe Bay Ramsar site within Fylde.	Morecambe Bay Ramsar site is included.
Whooper swan	Estuaries and wetlands for winter roosts.	Ribble and Alt Estuaries SPA and Ramsar site both within Fylde. Martin Mere SPA and Ramsar site outside Fylde.	Features for which the Martin Mere SPA and Ramsar is designated, have potential to use land within Fylde.
Bewick's swan / Tundra swan	Wintering bird, favours lakes, ponds and rivers along with estuaries.	Ribble and Alt Estuaries SPA and Ramsar site within Fylde. Martin Mere SPA and Ramsar site outside Fylde.	Features for which the Martin Mere SPA and Ramsar is designated, have potential to use land within Fylde.
Wigeon	Wintering bird, large numbers found on the coast. Wigeon is largely a coastal species, feeding on mud-flats, coastal flooded grassland and saltmarsh pastures. The species is also widespread on inland flooded grassland ⁴ .	Morecambe Bay Ramsar site) and Ribble and Alt Estuaries SPA / Ramsar site all within Fylde. Martin Mere Ramsar site outside Fylde.	Features for which the Martin Mere SPA and Ramsar is designated, have potential to use land within Fylde. Wet grassland may constitute functionally linked land in relation to this species.
Goldeneye	Wintering bird in the area found on lakes, large rivers and sheltered coasts.	Morecambe Bay Ramsar site within Fylde.	Morecambe Bay Ramsar site is included.
Red-breasted merganser	UK birds start to flock on the coast from July, reaching a peak in December.	Morecambe Bay Ramsar site within Fylde.	Morecambe Bay Ramsar site is included.
Northern lapwing	In the breeding season prefer spring sown cereals, root crops, permanent unimproved pasture, meadows and fallow fields. They can also be found on wetlands with short vegetation. In winter they flock on pasture and ploughed fields.	Morecambe Bay Ramsar site within Fylde.	Morecambe Bay Ramsar site is included.

⁴<http://jncc.defra.gov.uk/pdf/UKSPA/UKSPA-A6-28B.pdf> accessed 10/10/15

Species	Relevant information about distribution	European sites supporting this species in and surrounding Fylde	Reason for inclusion or otherwise
Bar-tailed godwit	Largest numbers occur on large estuaries – wintering bird.	Morecambe Bay SPA and Ramsar site, Ribble and Alt Estuaries SPA and Ramsar site all within Fylde.	Morecambe Bay SPA and Ramsar site and Ribble and Alt Estuaries SPA and Ramsar site are already included.
Black-tailed godwit	Estuaries and coastal lagoons though they also visit wetland sites inland.	Ribble and Alt Estuaries SPA and Ramsar site both within Fylde.	Ribble and Alt Estuaries SPA and Ramsar site are already included.
Teal	In winter birds congregate in low-lying wetlands.	Ribble and Alt Estuaries SPA and Ramsar site both within Fylde.	Ribble and Alt Estuaries SPA and Ramsar site are already included.
Common tern	Breeds along coasts with shingle beaches and rocky islands, on rivers with shingle bars, and at inland gravel pits and reservoirs, feeding along rivers and over freshwater.	Ribble and Alt Estuaries SPA within Fylde.	Ribble and Alt Estuaries SPA is already included.
Ruff	Grassy tundra, lakes, farmland.	Ribble and Alt Estuaries SPA in Fylde.	Ribble and Alt Estuaries SPA is already included.

Relevant European Sites Outside of Fylde

As a result of Table 4 and Table 5, the following European designated sites outside Fylde will be considered further in this Screening Report.

Table 6: Summary of European Sites Outside Fylde Boundary

Name of Site	Identification Number	Designation
Morecambe Bay	UK 0013027	SAC
Sefton Coast	UK 0013076	SAC
Martin Mere	UK 9005111	SPA
Martin Mere	UK 11039	Ramsar Site
Bowland Fells	UK 9005151	SPA

4.3.3 Appendix A provides further information regarding the European sites including current conservation status, threats and the results of the most recent condition assessments.

4.4 Conservation Objectives of the European Sites

4.4.1 Under Regulation 35(3) of the Conservation of Habitats and Species Regulations 2010 (as amended) the appropriate statutory nature conservation body (in this case Natural England) has a duty to communicate the conservation objectives for a European site to the relevant/competent authority

responsible for that site. The information provided under Regulation 35 must also include advice on any operations which may cause deterioration of the features for which the site is designated.

4.4.2 The conservation objectives for a European site are intended to represent the aims of the Habitats and Birds Directives in relation to that site. To this end, habitats and species of European Community importance should be maintained or restored to 'favourable conservation status' (FCS), as defined in Article 1 of the Habitats Directive below:

4.4.3 The conservation status of a natural habitat will be taken as 'favourable' when:

- Its natural range and the area it covers within that range are stable or increasing;
- The specific structure and functions which are necessary for its long term maintenance exist and are likely to continue to exist for the foreseeable future; and
- Conservation status of typical species is favourable as defined in Article 1(i).

4.4.4 The conservation status of a species will be taken as favourable when:

- Population dynamics data on the species concerned indicate that it is maintaining itself on a long-term basis as a viable component of its natural habitats;
- The natural range of the species is neither being reduced nor is likely to be reduced for the foreseeable future; and
- There is, and will probably continue to be, a sufficiently large habitat to maintain its populations on a long-term basis.

4.4.5 Guidance from the European Commission⁵ indicates that the Habitats Directive intends FCS to be applied at the level of an individual site, as well as to habitats and species across their European range. Therefore, in order to properly express the aims of the Habitats Directive for an individual site, the conservation objectives for a site are essentially to maintain (or restore) the habitats and species of the site at (or to) FCS.

4.4.6 Conservation Objectives for Morecambe Bay SPA / Ramsar site / SAC, Ribble and Alt Estuaries SPA / Ramsar site and Martin Mere SPA / Ramsar site, Bowland Fells SPA, Martin Mere SPA and Ramsar site were obtained from Natural England's website and are provided in Appendix B⁶.

⁵ Managing Natura 2000 sites: the provisions of Article 6 of the Habitats Directive 92/43/EEC. (European Commission 2000)

⁶ <http://publications.naturalengland.org.uk/category/4582026845880320> accessed 10/10/15

5 Screening

5.1 Context

5.1.1 The Fylde Local Plan contains a vision and strategy that sets out how the Council would like Fylde to develop over the Plan period. It seeks to not only ensure that new homes, jobs and services required by communities are located in the most sustainable locations, but also that the framework for delivering the necessary infrastructure, facilities and other development will be provided to make this possible.

5.2 Screening Approach taken for the Local Plan

5.2.1 The screening process has been split into two distinct stages, initial screening and detailed screening. The initial screening stage has provided a high level screening 'matrix style' assessment to determine if the Fylde Local Plan could possibly lead to significant adverse effects on European sites identified in Section 4. The purpose of this was to eliminate those policies from the assessment which very clearly would not affect European sites in order to focus on those policies where there was potential for effects or uncertainty about potential effects. These policies were generally those that could not lead to 'direct development', or could have no impact pathway to any of the European sites identified. The policies that were identified as having potential impacts on the European sites or those policies for which impacts were uncertain, were carried forward into a more detailed screening assessment.

5.2.2 All strategic and non-strategic sites were carried forward into the detailed screening assessment.

5.2.3 When identifying the elements of the Fylde Local Plan that could potentially affect European sites, it was important to focus upon those elements that would have the greatest likelihood of impacting the sites. Therefore, the definition of significance identified in Section 3.2 was very important for the detailed screening. Consultation with NE also determined that additional bird data was required to aid the detailed screening assessment of strategic and non-strategic sites (refer to Section 2.2).

5.2.4 The Fylde Local Plan is intended to be read as a single document rather than a series of separate policies, and has been assessed as such. Proposals in one area of the Local Plan may mitigate potentially damaging activities promoted in another area and should be understood in the wider context of the Plan's aims and purposes.

5.2.5 The sections below outline the initial and detailed screening of the Fylde Local Plan.

5.3 Initial Screening of the Local Plan Policies

5.3.1 The initial screening of the Fylde Local Plan is presented in Table 7 below.

The policies within the sub-headings were initially examined to determine their need for further detailed screening. The notations below were used to indicate if further detailed assessment screening is required:

✓ Further detailed screening is required to determine the nature of effects on the European site.

X No further screening is required as no effects are predicted on the European site.

Table 7: Initial Screening of the Local Plan

European Sites	National, Policy	The Development Strategy	Strategic Locations for Development	General Development Policies	The Fylde Economy	Provision of Homes in Fylde	Health and Wellbeing	Infrastructure, Services Provision and Transport	Water Resource Management, Flood Risk and Addressing Climate Change	Conserving and Enhancing the Natural, Historic and Built Environment
Morecambe Bay SPA	X	✓	✓	✓	✓	X	X	✓	X	X
Morecambe Bay Ramsar	X	✓	✓	✓	✓	X	X	✓	X	X
Ribble and Alt Estuaries SPA	X	✓	✓	✓	✓	X	X	✓	X	X
Ribble and Alt Estuaries Ramsar	X	✓	✓	✓	✓	X	X	✓	X	X
Morecambe Bay SAC	X	✓	✓	✓	✓	X	X	✓	X	X
Sefton Coast SAC	X	✓	✓	✓	✓	X	X	✓	X	X
Martin Mere SPA	X	✓	✓	✓	✓	X	X	✓	X	X
Martin Mere Ramsar	X	✓	✓	✓	✓	X	X	✓	X	X
Bowland Fells SPA	X	✓	✓	✓	✓	X	X	✓	X	X
Policies Screened In		DLF1	SL1, SL2, SL3, SL4, SL5	GD4, GD5	EC1, EC4 EC5			T1, T3		
Policies Screened out	NP1	S1	M1	GD1, GD2, GD3, GD6, GD7, GD8, GD9	EC2, EC3, EC6, EC7	H1, H2, H3, H4, H5, H6, H7	HW1, HW2, HW3	INF1, INF2, T2, T4, T5	CL1, CL2, CL3, CL4	ENV1, ENV2, ENV3, ENV4, ENV5, ENV6

5.3.2 Following the initial screening of the Fylde Local Plan, policies contained within four of the sub-headings in the plan can be screened out completely from further assessment, on the basis that no identifiable impact pathway exists linking the policies with the European Sites and/or because there will be no foreseeable adverse impact on European sites through Policy implementation. In addition, several further policies under each of the sub-headings have been screened out of further assessment on a similar justification. Table 8 provides a justification for the policies screened out of further assessment, and the assessment categories set out within Table 2, above.

Table 8: Policies screened out of further assessment

Policy	Justification	Assessment Category
National, Regional and Sub-regional Policy: NP1	Policy NP1 sets out the presumption in favour of sustainable development and would not lead directly to any impacts on European sites.	D
The Development Strategy: S1	Policy S1 provides details on the settlement hierarchy, development that is appropriate to the scale and character of settlements at each level of the settlement hierarchy, will be promoted in accordance with the development strategy. The policy itself does not provide for change.	F
Masterplanning the Strategic Locations for Development: M1	This policy details the criteria developments need to meet. The Policy states that <i>'The conservation and enhancement of important environmental assets and natural resources, biodiversity (nature conservation) and ecological networks. Ecological connectivity within the site and with the surroundings should be maintained and enhanced through appropriate site layout; the retention of existing important features including trees, woods and water bodies and their integration within a well-designed landscape with appropriate habitat protection. The site designs should be informed by appropriate ecological surveys to ensure appropriate mitigation measures are implemented. Potentially damaging effects of development on sites of nature conservation value, especially Natura 2000 sites should be avoided, unless the potential effects can be mitigated.'</i> If this is adhered to European sites will not be impacted. However, individual sites should be assessed on a case by case basis, therefore Policies SL1 to SL5 have been screened in.	D
General Development Policies: GD1, GD2, GD3, GD6, GD7, GD8, GD9	Policies GD1 GD2, GD3 relate to issues such as settlement boundaries, retaining green belts and maintaining an area of separation between settlements. GD6 and GD7 relate to the requirement to provide mixed development. GD8 seeks to retain employment uses in that use, unless certain tests are met. GD9 relates to preference for development on contaminated land. There is no impact pathway from the implementation of these policies to the European sites.	F
The Fylde Economy: EC2, EC3, EC6 and EC7	Policy EC2 seeks to retain continued employment use of existing employment sites. Sustainable growth and expansion of business is supported where this is in accordance with other policies in this Local Plan, requirements within ENV2 would therefore need to be taken into consideration ensuring protection of Natura 2000 sites. The implementation of policy EC3 provides for continued support of Lancashire advanced engineering and manufacturing (AEM) enterprise zone at BAE	G

Policy	Justification	Assessment Category
	Systems, Warton. Policy EC6 relates to promoting leisure and tourism in the coastal town of St Annes, such plans have the potential to impact European sites, however, the Policy also specifies that a project-specific HRA is required for any proposal near the Ribble and Alt Estuaries SPA /Ramsar, therefore sufficient safeguards are included within this policy to ensure no adverse impacts on the integrity of European sites; Policy EC7 supports development of tourism accommodation, but specifically states that such developments will not impact on European sites.	
Provision of Homes in Fylde: H1, H2, H3, H4, H5, H6, H7	Policies H1 to H7 relate to the allocation of housing, density and mix of residential developments, conversion of buildings to residential, providing affordable housing, gypsy, traveller and travelling show people sites, isolated new homes in the countryside and replacements and extensions to existing dwellings in the countryside. None of these policies are anticipated to have any impacts on European sites.	G
Health and Wellbeing: HW1, HW2, HW3	Policies HW1 and HW2 concern the reduction of health inequalities through the integration of public health principles and planning, the integration of community and health facilities. The implementation of these Policies is not expected to have any implications on European sites. Policy HW3 concerns the provision of indoor and outdoor sport facilities, and the requirement for these to be accessible by public transport, walking and cycling. Therefore these facilities will be located near urban areas and are unlikely to have an impact on European sites.	G
Infrastructure, Services Provision and Transport: INF1, INF2, T2, T4, T5	Policy INF1 relates to the provision of new sustainable infrastructure in relation to new developments. Construction of new infrastructure may have potential impacts on European sites, however the policy states that mitigation for any environmental impacts will be required. Policy INF2 concerns developer contributions to infrastructure development and has no direct impact on European sites. T2 details that Warton Aerodrome development, which will occur only as extension to existing properties. T4 relates to enhancing sustainable transport choice, which will have no adverse impact on the European sites (sufficient safeguards are included within Policy ENV2 to ensure no adverse impacts on the integrity of European sites) T5 relates to car parking provision to ensure no detrimental effect on highway safety, this will have no adverse impact on European sites.	G
Water Resource Management, Flood Risk and Addressing Climate Change:	Policy CL1 concerns flood alleviation, water quality and water efficiency. Policy CL2 relates to surface water run-off and sustainable drainage. Policy CL4 promotes small scale decentralised energy networks and district heating system.	D

Policy	Justification	Assessment Category
CL1, CL2, CL3, CL4	None of these policies are anticipated to have adverse impacts on the European sites. CL3 promotes renewable and low carbon energy generation (excluding onshore wind turbines), such developments have the potential to impact on European sites that are designated for mobile species such as migratory birds. Within the policy a clause states project specific HRA for any proposal near to European designated sites will be required and HRAs will need to demonstrate no likely significant effect before permission is granted.	
Conserving and Enhancing the Natural, Historic and Built Environment: ENV1, ENV2, ENV3, ENV4, ENV5, ENV6	Policy ENV1 is related to the protection of the landscape and its character through visual impact, landscape character amenity and tranquillity. Coastal change management is also incorporated in this policy, and specifies that any tourist or coastal defence development will require a project level HRA to demonstrate no LSE on the Ribble or Alt Estuaries SPA/Ramsar. Policy ENV 2 provides protection and enhancement of biodiversity. Policy ENV 3 protects existing open space of the green infrastructure network. Policies ENV4 is concerned with new provision of open space and the green infrastructure network. Policy ENV5 relates to heritage assets. The implementation of these policies is considered to have no adverse impacts and potentially some beneficial effects on the European sites.	D

5.3.3 Table 9 provides a justification for the policies screened in for further assessment.

Table 9: The policies screened in for further assessment

Policy	Justification
The Development Strategy: DLF1	Policy DLF1 provides details of the proposed housing and employment development locations for Fylde. The policy aims to focus development at the four strategic locations for development, with smaller amount of development at the tier 1 larger rural settlements and tier 2 smaller rural settlements. Some development will be located in rural areas, therefore, there are potential impacts on European sites as a result of the implementation of this policy.
Strategic Locations for Development, Strategic Development Sites and Non-Strategic Development Sites: SL1, SL2, SL3, SL4 and SL5,	Policies SL1, SL2, SL3, SL4 and SL5 lead to development of housing and employment that could have impacts on the European sites through increased recreational and other disturbance pressure leading to degradation of habitats and disturbance of species.
General Development Policies: GD4, GD5	Policy GD4 concerns development in the countryside, specifically restricting this to that needed for agriculture, horticulture or forestry. However, this does included building of some new homes in the countryside and development essential for continuation of an enterprise facility or operation. Policy GD5 concerns the redevelopment of large developed sites in the countryside. Such developments as outlined within policies GD4 and GD5 has the potential to affect European sites.

Policy	Justification
<p>The Fylde Economy: EC1, EC4, EC5</p>	<p>Policy EC1 concerns the overall provision of employment land, the development of which may lead to impacts on European sites.</p> <p>Policy EC4 relates to the Blackpool Airport Enterprise Zone. Development within this area has the potential to impact upon European sites, through functionally linked land.</p> <p>Policy EC5 relates to maintaining vibrant town, district and local centres, much of the planned polices are within towns, however, 'edge of centre' or 'out of centre' locations will be considered in line with the Framework, bearing in mind the impact on existing centres These have a higher potential to impact upon European sites.</p>
<p>Infrastructure, Services Provision and Transport: T1, T3</p>	<p>Policy T1 deals with strategic highway improvements including new highways. These have the potential to adversely affect the European sites. Further development of Blackpool International Airport (Policy T3) may have the potential to affect European sites.</p>

6 Detailed Screening of the Fylde Local Plan Policies and Sites

- 6.1.1 The detailed screening of the Fylde Local Plan policies and sites (strategic and non-strategic) in relation to the European Sites is presented in Table 10 to Table 14, and is based on the findings of the initial screening exercise. In Table 10, where a policy is implemented through a later policy within the Fylde Local Plan (which specifies particular strategic sites), the potential for significant effects on European sites have been categorised in accordance with the classification for the later policy. For example, Policy DLF1 is implemented through the Strategic Locations for Development policies (presented in Table 11).
- 6.1.2 The detailed screening of the Fylde Local Plan policies and sites (strategic and non-strategic) contained details of the potential impacts (refer to Section 6.2), potential avoidance and mitigation (Section 30.3) and whether further Appropriate Assessment would be required (refer to Section 6.4). Each policy and site also included a categorisation of the potential effects in line with current guidance³ (refer to Section 3.3, Table 2).
- 6.1.3 The detailed screening of strategic and non-strategic sites (not policies) also takes into consideration consultation with NE (refer to Section 2.2). Additional bird data has been obtained to provide a more robust assessment. The bird data is presented within Appendix C and summarised within Table 11 to Table 14. A detailed methodology of how the bird data has been interpreted is also presented within Section 6.5.

6.2 Potential Impacts

- 6.2.1 The following potential impacts have been considered:

Direct habitat and species loss associated with European sites

- 6.2.2 Construction works could result in the direct destruction of habitats, leading to a net loss in the extent of habitat area. The southern extent of Morecambe Bay SPA/Ramsar is situated on the northern boundary of the Borough, and the Ribble and Alt SPA/Ramsar site is located on the southern boundary of the Borough. None of the proposed strategic and non-strategic sites are within a designated site so direct habitat loss is not anticipated with new housing and employment sites.
- 6.2.3 Mortality of birds as a result of collision with new renewable energy projects (Policy CL3), including small scale wind and solar farm developments, could also affect species associated with European Sites, although HRA of any such projects would be required to ensure potentially significant effects are avoided or mitigated prior to approval of planning consent to comply with Policy ENV2.

Habitat degradation as a result of increased air pollution

- 6.2.4 Changes in air quality from increased traffic and development could have impacts on European sites. For example, changes in air quality as a result of increased population and road traffic may affect habitats that are sensitive to increased nitrogen deposition. In addition, as the prevailing winds are from a south westerly direction, there is a risk that any increases in air pollution could eventually deposit on the Bowland Fells SPA. However, this is considered to be negligible given the distances involved, and has been scoped out of further assessment.
- 6.2.5 Any construction sites or routes used by construction vehicles within 50m of a European site⁷; and any European site within 200 m of the main access roads used by HGVs accessing the site⁸ could lead to significant effects and would require assessment at the project level.

⁷ Institute of Air Quality Management (IAQM), Guidance on the assessment of dust from demolition and construction (2014)

⁸ Design Manual for Roads and Bridges, Volume 11, Section 3, Part 1, HA 207/07 – Air Quality, Highways Agency, 2007.

Loss of habitat functionally linked to a European site (i.e. used by overwintering birds for foraging)

6.2.6 Functionally linked land is considered to be any land outside of the European designated site which is used by species that are qualifying interest features of that designated site. In relation to this Screening Report, this includes land used by qualifying bird species during the winter and on passage for foraging or roosting, such as pink-footed geese.

Disturbance to habitats and species through increased recreational activity, during operational stage

6.2.7 An increase in population (as a result of new development and improved road infrastructure) could result in increased recreational pressure as a result of additional people in an area and the consequent increases in people visiting the European sites. A Recreational Disturbance Study carried out by Footprint Ecology for the Morecambe Bay Partnership⁹ identified that visitors to Morecambe Bay who were on a day-trip/short visit from home travelled a median distance of 3.454km to get to the designated site.

6.2.8 The southern extent of Morecambe Bay SPA/Ramsar is situated on the northern boundary of the Borough and Sefton Coast SAC is located approximately 9.3km to the south. Although the potential exists for increased disturbance through a rise in visitor pressure as the housing developments are progressively completed, the risk is low that significant numbers of residents in Fylde will choose to visit Morecambe Bay SAC (approximately 7km from Fylde), Sefton Coast SAC (approximately 9km from Fylde) and/or the Bowland Fells SPA (approximately 15km from Fylde) in preference to more local destinations. Similarly, it is considered that increased visitor pressure will not adversely affect Martin Mere SPA/Ramsar as this site is effectively managed by the Wildfowl and Wetlands Trust. However, the Morecambe Bay SPA/Ramsar and Ribble and Alt Estuaries SPA/Ramsar are within close proximity for residents of Fylde. Therefore, increased disturbance to birds (as a result of recreational pressure) at these European site could occur.

Changes in water quality where sites are hydrologically linked to European sites

6.2.9 Changes in water quality as a result of new development could have impacts on European sites. For example, increased risk of potential pollution incidents, and potential increases in suspended sediments resulting in ecological effects, such as the direct loss of habitats caused by re-deposition of suspended sediment, and the consequential health or mortality effects on prey species, particularly invertebrates associated with the intertidal mudflats.

6.2.10 Although Sefton Coast SAC, Morecambe Bay SAC/SPA/ Ramsar site and Ribble and Alt Estuaries SPA/ Ramsar site have all been identified as being hydrologically linked to watercourses within Fylde; adverse impacts on water quality are considered to be unlikely as all new developments would follow strict water quality/pollution prevention measures, such as the Environment Agency Pollution Prevention Guidelines (PPG).

6.2.11 A review of aquifers has also been undertaken. Much of Fylde is underlain by a Secondary B Aquifer; however, the east of the Borough is underlain by a Principal Aquifer. These are permeable layers capable of supporting water supplies at a local rather than strategic scale, in some cases forming an important source of base flow to rivers or otherwise yielding limited groundwater. Martin Mere SPA/Ramsar is underlain by the same broad aquifer. However, the likelihood is that there will be no adverse impacts on groundwater links between Fylde and European Sites (Martin Mere SPA/Ramsar) as a result of increased abstraction for drinking water as all drinking water is sourced from outside the Borough, in the Lake District, with no impact pathway to the European sites.

⁹ Liley, D., Underhill-Day, J., Panter, C., Marsh, P. & Roberts, J. (2015). Morecambe Bay Bird Disturbance and Access Management Report. Unpublished report by Footprint Ecology for the Morecambe Bay Partnership

Disturbance to species as a result of construction activities/ operational stage

- 6.2.12 There is the potential to disturb species associated with European sites, in particular birds, during the construction and operational phases of new developments. Disturbance could occur as a result of increased visual, noise, vibration and lighting, with a resultant potential loss of fitness and the consequential health or mortality effects on birds and their prey species. Fragmentation effects could also cause a barrier to the movement and dispersal of species, thereby limiting access to foraging opportunities.
- 6.2.13 In addition, a number of the strategic and non-strategic sites are located adjacent to land which could potentially constitute functionally-linked land. These developments could lead to significant effects, in terms of noise and visual disturbance (during both the construction and operational phase of new developments). This could affect foraging birds, associated with Morecombe Bay SPA/ Ramsar site, the Ribble and Alt Estuaries SPA/Ramsar site and Martin Mere SPA/Ramsar.

6.3 Embedded Avoidance and Mitigation

- 6.3.1 Throughout the consultation period a number of revisions have been made to the Plan to ensure the final Plan avoids or minimises the potential for impacts upon the European sites (refer to Section 2.2). The avoidance/mitigation measures included within the Plan include Policy ENV2 which outlines the hierarchy of nature conservation sites and details the requirement to ensure there is no net loss of biodiversity within the district. The policy also states that any proposals with the potential to adversely affect designated sites will be required to provide adequate mitigation measures or compensatory measures and that “*where significant harm cannot be avoided, mitigated or as a last resort replaced or compensated then planning permission will be refused*”.
- 6.3.2 The requirement for project level HRA to be undertaken is also included within Policies EC6, ENV1 and CL3. This will also provide assurance that projects proposed under these policies, with the potential to adversely affect European sites, are adequately assessed to ensure no likely significant effects on European Sites.

6.4 Further Assessment of Fylde Local Plan Policies

- 6.4.1 The Fylde Local Plan policies were examined in detail to determine the need for further Assessment (Table 10, below).
- 6.4.2 In a number of cases, insufficient information is currently available to conclude that a policy has no likely significant effects. In these instances, it was considered that other policies within the plan would act to safeguard the European sites through the requirement to assess the potential impacts upon European sites prior to planning consent being granted (i.e. Policy ENV2).

Table 10: Detailed Screening of Fylde Local Plan Policies in relation to European Sites Within and Outside of Fylde

Local Plan Policy	Potential Impacts on European Sites	European Sites Potentially Affected	Potential Impacts on functionally-linked land associated with the European Sites	Further Assessment	Assessment Category	Conclusion
Policy DLF1 – Development locations in Fylde	This policy is implemented through other policies in the Local Plan, in this case the Strategic Locations for Development policies. The Strategic Locations for Development (as set out in Table 11 and Table 13 below) has the potential for significant effects on European sites and this policy is therefore classified in accordance with the classification for the Strategic Locations.	Morecambe Bay SPA/Ramsar Ribble and Alt Estuaries SPA/Ramsar Martin Mere SPA/ Ramsar	The main focus of the development strategy is concentrating development at the four strategic locations for development (78%), 9.7% of development will be at non-strategic locations, and 12.6 % as allowances and on unallocated sites. Fylde has very little brownfield land therefore most development will be on greenfield sites adjacent to the main settlements. As a number of the development sites at the Strategic Locations for Development are located on agricultural land, impacts on species using land which could potentially constitute functionally linked land associated with European sites are possible.	Sites associated with the Strategic Locations detailed in SL2 as outlined in Policy DLF1 could not confirm that no significant effects would occur, as such, the potential for likely significant effects as a result of this overarching policy cannot be ruled out. Nevertheless, compliance with Policy ENV2 would ensure appropriate safeguards for protected European sites are incorporated into any proposed developments in these areas. This could include re-screening at the project-level, in order to update the bird information and to consider the implications of the detailed project proposals.	H	No likely significant effect.
Policies SL1, SL3, SL4 and SL5	The Strategic Locations for Development (as set out in SL1, SL3 and SL5) have the potential for significant effects on European sites and these policies therefore classified in accordance with the classification for the Strategic Locations.	Morecambe Bay SPA/Ramsar Ribble and Alt Estuaries SPA/Ramsar Martin Mere SPA/ Ramsar	The policies identify sites which are proposed for development. Whilst other policies within the Plan provide for safeguarding biodiversity and protected sites (ENV2 and M1) there are no specific references within the policies themselves and therefore developments located on agricultural land which could constitute functionally linked land could lead to impacts upon species associated with European sites.	The sites associated with these policies have been assessed in further detail, the results of which are outlined below in Tables 11 to 14. No likely significant effects alone or in-combination with other sites have been identified and therefore no significant effects upon European sites as a result of these policies are anticipated.	K	No likely significant effect.
Policy SL2	The Strategic Locations for Development (as set out in SL2 and SL4) have the potential for significant effects on European sites and these policies are therefore classified in accordance with the classification for the Strategic Locations.	Morecambe Bay SPA/Ramsar Ribble and Alt Estuaries SPA/Ramsar Martin Mere SPA/ Ramsar	The policies identify sites which are proposed for development. Whilst other policies within the Plan provide for safeguarding biodiversity and protected sites (ENV2 and M1) there are no specific references within the policies themselves and therefore developments located on agricultural land which could constitute functionally linked land could lead to impacts upon species associated with European sites.	The sites associated with this policy has been assessed in further detail, the results of which are outlined below in Tables 11 and 13. Two sites, HSS4 and MUS2, were identified as having the potential for significant effects alone. Nevertheless, compliance with Policy ENV2 would ensure appropriate safeguards for protected European sites are incorporated into any proposed developments in these areas. This could include re-screening at the project-level, in order to update the bird information and to consider the implications of the detailed project proposals.	H	No likely significant effect

Local Plan Policy	Potential Impacts on European Sites	European Sites Potentially Affected	Potential Impacts on functionally-linked land associated with the European Sites	Further Assessment	Assessment Category	Conclusion
<p>General Development Policies:</p> <p>GD4 Development in the Countryside</p> <p>GD5 Large Developed Sites in the Countryside</p>	<p>Policy GD4 concerns development in the countryside. Policy GD5 allows complete or partial redevelopment of certain sites, outside of settlement boundaries, under certain criteria. It should be noted that redevelopment is not restricted to those sites listed in GD5. Impacts on European sites outside Fylde are unlikely to be significant, given the small scale nature of such development. There should not be any additional road building or major infrastructure expenditure as a result of any proposals to redevelop these areas.</p> <p>However, potential impacts on the Ribble and Alt Estuaries SPA/Ramsar relate to potential increases in pollution incidents if the sites are hydrologically-linked to proposed development areas. There is also likely to be an increase in recreational pressure on the Ribble and Alt Estuaries SPA/Ramsar associated with development on these sites.</p>	<p>Morecambe Bay SPA/Ramsar</p> <p>Ribble and Alt Estuaries SPA/Ramsar</p> <p>Martin Mere SPA/Ramsar</p>	<p>Given that there could be loss of agricultural land associated with these policies, significant effects on land which could potentially constitute functionally linked land associated with European sites, could occur.</p>	<p>Potential impacts as a result of pollution incidents would be avoided through compliance with Policy CL1.</p> <p>Compliance with Policy ENV2 would ensure appropriate safeguards for protected European sites are incorporated into any proposed developments in these areas. This could include re-screening at the project-level, in order to update the bird information and to consider the implications of the detailed project proposals.</p>	H	No likely significant effect
<p>The Fylde Economy:</p> <p>EC1: Overall Provision of Employment Land and existing employment sites.</p>	<p>This policy sets out the overall provision of employment land and existing employment sites within Fylde. These sites (as set out in Error! Reference source not found. Table 13 below) have the potential for significant effects on European sites and this policy is therefore classified in accordance with the classification for the Strategic Locations.</p>	<p>Morecambe Bay SPA/Ramsar</p> <p>Ribble and Alt Estuaries SPA/Ramsar</p> <p>Martin Mere SPA/Ramsar</p>	<p>Significant effects on land which could potentially constitute functionally linked land associated with European sites are anticipated and individual site assessments need to be undertaken.</p>	<p>One proposed employment site identified by this policy could not be ruled out from having a potentially significant effect upon the Ribble and Alt Estuaries SPA – Due to presence of functionally linked land within the allocation site, MUS2 was considered to have the potential for significant effects upon Pink-footed geese.</p> <p>Compliance with Policy ENV2 would ensure appropriate safeguards for protected European sites are incorporated into any proposed developments in these areas. This could include re-screening at the project-level, in order to update the bird information and to consider the implications of the detailed project proposals.</p>	H	No likely significant effect
<p>The Fylde Economy</p> <p>EC4: Blackpool Enterprise Zone</p>	<p>Increasing the use of the airport, is likely to increase any potential disturbance to the European sites in close proximity (Alt and Ribble SPA/Ramsar).</p>	<p>Morecambe Bay SPA/Ramsar</p> <p>Ribble and Alt Estuaries SPA/Ramsar</p> <p>Martin Mere SPA/Ramsar</p>	<p>Policy EC4 relates to the Blackpool Airport Enterprise Zone development within this area has the potential to impact upon European sites, through functionally linked land. However, relocation of airport buildings at this site would be on previously development land.</p>	<p>Compliance with Policy ENV2 would ensure appropriate safeguards for protected European sites are incorporated into any proposed developments in these areas. This could include re-screening at the project-level, in order to update the bird information and to consider the implications of the detailed project proposals</p>	H	No likely significant effect
<p>The Fylde Economy:</p> <p>EC5: Vibrant Town, District and Local Centres.</p>	<p>No potential impacts on European Sites anticipated through town centre development.</p>	<p>Morecambe Bay SPA/Ramsar</p> <p>Ribble and Alt Estuaries SPA/Ramsar</p> <p>Martin Mere SPA/Ramsar</p>	<p>Out of centre locations that may be considered under this policy and these may be associated with land functionally linked to European sites and used by mobile species. However, these proposals will be considered in line with the Framework, bearing in mind impacts on existing centres.</p>	<p>Compliance with Policy ENV2 would ensure appropriate safeguards for protected European sites are incorporated into any proposed developments in these areas. This could include re-screening at the project-level, in order to update the bird information and to consider the implications of the detailed project proposals.</p>	H	No likely significant effect

Local Plan Policy	Potential Impacts on European Sites	European Sites Potentially Affected	Potential Impacts on functionally-linked land associated with the European Sites	Further Assessment	Assessment Category	Conclusion
<p>Infrastructure, Service Provision and Transport:</p> <p>T1 Strategic Highway Improvements</p> <p>a) The M55 to Heyhouses (St Annes) Link Road;</p> <p>b) The M55 Fleetwood corridor improvement; and</p> <p>c) The A585 Skippool – Windy Harbour Improvements.</p>	<p>Policy T1 relates to new road construction to facilitate new development, and replace the most direct route from St Annes to the M55 which is currently closed.</p> <p>Water quality may be affected where there are hydrological links due to increased polluted surface water run-off from roads, although this is very unlikely to be significant.</p> <p>Increases in recreational pressure as a result of road construction making it easier to reach the Ribble and Alt Estuaries SPA/Ramsar may also adversely affect the birds through increased disturbance.</p> <p>There is also the potential for adverse impacts on air quality as a result of increased population and road traffic, which may affect habitats in close proximity to the new roads.</p>	<p>Morecambe Bay SPA/ Ramsar</p> <p>Ribble and Alt Estuaries SPA/Ramsar</p> <p>Martin Mere SPA/Ramsar</p>	<p>The habitat lost through road development is likely to be arable or pastoral and as such is likely to be located on land which could potentially constitute functionally linked land associated with European sites.</p> <p>Road development also has the potential to increase access to functionally linked land and therefore increase disturbance at such sites.</p>	<p>Compliance with Policy ENV2 would ensure appropriate safeguards for protected European sites are incorporated into any proposed developments in these areas. This could include re-screening at the project-level, in order to update the bird information and to consider the implications of the detailed project proposals.</p>	H	No likely significant effect
<p>Infrastructure, Service Provision and Transport:</p> <p>T3 Blackpool International Airport</p>	<p>The proximity of Blackpool International Airport to the Ribble and Alt Estuaries SPA/ Ramsar means that any further development at this location has the potential to increase disturbance of birds using the designated habitats adjacent to the site, particularly if the proposals result in increased air traffic.</p> <p>An HRA of future development proposals is likely to be required.</p>	<p>Morecambe Bay SPA/ Ramsar</p> <p>Ribble and Alt Estuaries SPA/Ramsar</p> <p>Martin Mere SPA/Ramsar</p>	<p>Land within the boundaries of Blackpool Airport masterplan is not considered to be functionally linked to the European sites.</p> <p>Given the close proximity of the airport to the Ribble and Alt Estuaries SPA/Ramsar, development within this area has the potential to impact the European sites through increased disturbance.</p>	<p>Compliance with Policy ENV2 will ensure potential impacts upon designated sites are assessed and fully mitigated where necessary.</p>	H	No likely significant effect

6.5 Further Assessment of Fylde Local Plan Sites

- 6.5.1 The Fylde Local Plan sites were examined in detail to determine the need for further assessment (Tables 11 to 14, below). The sites have been split into those with planning permission in progress/granted and those with no current planning permission (allocations). Tables 11 and 13 provide details of the strategic sites and Tables 12 and 14 provides details of the non-strategic sites.
- 6.5.2 When assessing non-strategic sites which are already within the planning system (Table 12), the sites have been grouped into one of four categories (based on their type, size or location), in order to avoid unnecessary repetition in the table. A number of non-strategic sites have already been completed or have been withdrawn from the plan, these sites are included for completeness but have not been assessed further within this HRA.
- 6.5.3 As outlined within Section 1, the detailed screening of strategic and non-strategic sites (not policies) also takes into consideration consultation with NE (refer to Section 2.2). Additional bird data has been obtained to provide a more robust assessment. The bird data is presented within Appendix C and summarised within Table 11 to Table 14. A detailed methodology of how the bird data has been interpreted is presented below.
- 6.5.4 Following the review of the potential impact, and the additional information available to inform the assessment, a conclusion has been drawn as to whether any of the individual sites could have a potentially significant impact upon European sites either alone or in-combination with other plans or projects.

Bird data sources

- 6.5.5 As advised by NE during consultation on an earlier iteration of this report (refer to Section 2.2), additional information to inform this assessment in relation to SPA qualifying bird species using functionally linked land, has been gathered.
- 6.5.6 The following data sources have been reviewed in order to determine the likelihood that land parcels included within the Fylde Local Plan support birds associated with an SPA/Ramsar site.

Fylde Bird Club Records

- 6.5.7 This data included almost 50,000 bird records from the most recent five years available (January 2010 to January 2015). Records were plotted according to the Ordnance Survey (OS) grid reference (where available), or according to the survey tetrad location. Where records related to a tetrad, further interrogation of the data was carried out to determine if additional location information was available and a review of aerial photographs was undertaken to provide further context to the records and therefore establish whether the records related to areas within strategic and non-strategic sites or other areas nearby.

Natural England pink-footed geese distribution¹⁰

- 6.5.8 A five point scale has been used by NE to reflect the relative abundance of geese recorded in a 1 km square, called the 'Goose Index'. Each square, where geese have been recorded feeding, has been weighted according to how many times they have been recorded, as well as how many birds were actually counted. The draft map provided indicates that pink-footed geese have been recorded feeding in five 1 km squares within the Fylde Borough; and have been recorded flying through within 14, 1 km squares within the Borough.

WeBS data

- 6.5.9 The location of WeBS core count areas was assessed against the Fylde Local Plan strategic and non-strategic sites. Only one small part of an existing employment site coincided with one of the count areas. Obtaining bird records from the WeBS count areas was therefore not required for this assessment.

¹⁰ Pink-footed geese Ribble and Alt Estuary Martin Mere. A draft map showing the distribution of pink-footed geese records using the 'Goose index' produced by Natural England (21/07/2015).

Local Records Centre

6.5.10 Given the extent of bird records received from the local bird club, data held by the local records centre was considered unlikely to provide additional information. The Local Records Centre was therefore not contacted.

Morecambe Bay Wader Roost Study

6.5.11 The Morecambe Bay Wader Roost Study has been reviewed in relation to the Fylde Local Plan strategic and non-strategic sites. No roost sites identified within the Morecambe Bay Wader Roost Study fall within Fylde District. It is acknowledged that the Ribble and Alt Estuaries also support significant wader roost sites, however, details of the locations of these sites are not included and therefore more detailed assessment is not possible at this stage.

Survey information from recent planning applications

6.5.12 For sites where planning applications have been submitted, survey documents have been reviewed (where available) to identify potential impacts that were identified for individual projects in order to enable a more robust in-combination assessment of the Fylde Local Plan to be undertaken.

Bird data interpretation

6.5.13 The assessment of the additional bird data was split into a two stage process, as agreed with NE (email correspondence dated 10th June 2016). The two stages comprised a rapid review of the existing sites which already have planning permission (excluding those which are already completed), and a more comprehensive assessment of sites which do not currently hold planning permission. The bird data is presented within Appendix C. These two stages are described in more detail below.

Strategic and non-strategic sites which already have planning permission (but are not yet complete)

6.5.14 Sites which already have planning permission (but are not yet complete) have been assessed to determine whether there are any previously unassessed impacts from these permissions by looking at the existing data/ evidence for the sites (i.e. a review of planning applications and associated documentation). Where there are no records for SPA/ Ramsar birds on the sites, these are not considered further at the plan level.

6.5.15 If SPA/ Ramsar birds are present but in low numbers (i.e. the developments had no LSE alone) then these are considered for in-combination impacts to determine whether the impact is significant when combined with the plan allocations which do not yet have planning permission (i.e. whether a significant effect is triggered by adding the allocations in the plan to the existing impact). The evidence gathering above has informed this assessment.

6.5.16 If SPA/ Ramsar birds were present in significant numbers alone or in-combination at the time of project assessment, then mitigation should have been provided at a project level. For these cases where mitigation has been provided, this is recorded in the conclusion in the plan HRA e.g. site X had significant numbers of birds and this mitigation was provided at a project level and therefore there are no additional impacts are anticipated as a result of the plan.

Strategic and non-strategic sites which do not have planning permission

6.5.17 For sites with no planning permission within the Local Plan (allocations) a more detailed review of the available data sources (as set out above) has been undertaken. The presence of any SPA bird records within a 300 m buffer of the allocation has been considered and additional information (from each bird record) in relation to the likely location of birds only recorded to the detail of the 2 km tetrad using the other available data sources has been carried out to allow for a realistic assessment of the likelihood of the allocation site supporting SPA birds.

Other data sources

6.5.18 In addition to the bird data, Natural England's SSSI Impact Risk Zone (IRZ) Geographic Information System (GIS) data was reviewed where appropriate to determine the types of development that would

require further consultation with Natural England to ensure impacts upon the SSSI (and therefore the associated European designations) are properly assessed.

Table 11: Detailed screening with respect to Fylde local plan strategic sites on European sites within and outside Fylde (planning permission in progress/granted)

Local Plan Strategic Site	European Sites Potentially Affected	Project Level planning/ HRA information	Additional bird data review summary	Assessment Category	Potential for significant effect alone?	Potential for in-combination effects with other sites where planning permission has not yet been granted?
Sites associated with Policy SL1 Lytham and St Annes Strategic Location for Development						
HSS1 - Queensway, St Annes	Morecambe Bay SPA/Ramsar Ribble and Alt Estuaries SPA/Ramsar Martin Mere SPA/Ramsar	Project level HRA has been undertaken and confirmed no likely significant effects (with mitigation in place).	SPA bird records present within site, potential impacts addressed within project-level HRA and appropriate mitigation provided.	K	No	No
MUS4 - Heyhouses Lane, St Annes	Ribble and Alt Estuaries SPA/Ramsar	Planning application documents show no impact pathways to SPA identified.	No SPA bird records associated with this site.	H	No	No
HSS3 - Lytham Quays, Lytham (built/ under construction)	Ribble and Alt Estuaries SPA/Ramsar	No HRA undertaken, NE objected to planning applications on grounds of insufficient detail (with regard to discharge into SPA) to rule out potential for significant effects. The planning application was amended to ensure discharge into the SPA was avoided. No further comments from NE were received.	No SPA bird records associated with this site.	H	No	No
Sites associated with Policy SL2 Blackpool Periphery Strategic Location for Development						
HSS4 - Coastal Dunes, Clifton Drive North, Blackpool Airport Corridor	Ribble and Alt Estuaries SPA/Ramsar	<p>Potential for significant effects as a result of increased human disturbance either alone or in-combination cannot be ruled out. The HRA Screening Report for the proposed development states the following:</p> <p><i>...Lytham Beach ranks fifth highest (out of a total of sixteen areas between the northern end of the Ribble SPA and the southern end of Liverpool Bay) for very high levels of recreational pressure. Recreational pressure from the holiday camp would have been seasonal (highest during the summer months when SPA qualifying bird species are at their lowest level), the increased public pressure from the proposed development will be year-round, dogs running loose on the beach has been identified as one of the most significant negative impacts on birds.</i></p> <p><i>Using a precautionary approach, this screening assessment has concluded that given the already very high levels of human disturbance experienced by Lytham Beach and St. Anne's Beach, adverse effects on the qualifying features of the Ribble & Alt Estuaries SPA/Ramsar cannot be ruled out as a result of the proposed development with regard to overwintering and passage waders and wildfowl...</i></p> <p>An Appropriate Assessment is therefore recommended, and NE are in agreement with this.</p>	No SPA bird records associated with this site.	I	Yes	Yes. Project-level Appropriate Assessment is required to ensure that this site complies with ENV2, in order to obtain planning consent. Appropriate compensation/mitigation will be required.

Local Plan Strategic Site	European Sites Potentially Affected	Project Level planning/ HRA information	Additional bird data review summary	Assessment Category	Potential for significant effect alone?	Potential for in-combination effects with other sites where planning permission has not yet been granted?
MUS2 - Whyndyke Farm, Preston New Road, Whitehills	Morecambe Bay SPA/Ramsar Ribble and Alt Estuaries SPA/Ramsar Martin Mere SPA/Ramsar	Project-level HRA has been undertaken which concluded no likely significant effect. This conclusion has been agreed with NE. NE's response included recommendations for incorporating mitigation into the development to reduce the potential impacts of recreational pressures upon the SPA.	One record of 3,000 pink-footed geese (from 2013), as well as other SPA records north of Mythop Road. Although this record of 3,000 birds was after the publication of the HRA (in 2011), site specific surveys were undertaken and the potential impacts upon pink-footed geese and other SPA species were assessed. It is likely that the single record of a large flock of geese was a one-off and that fields within the surrounding area are of higher importance for this species, as identified within the HRA. Sufficient mitigation included within the HRA to conclude no likely significant effects on SPA species.	H	No	No
Sites associated with Policy SL3 Warton Strategic Location for Development						
HSS2- Blackfield End Farm, Church Road, Warton	Ribble and Alt Estuaries SPA/Ramsar	Consultation with NE by the applicant confirmed no likely significant effect on any European Sites as a result of the proposed development	No SPA bird records associated with this site.	H	No	No
HSS7 - Highgate Park, Lytham Road, Warton	Ribble and Alt Estuaries SPA/Ramsar	Project-level HRA has been undertaken which concluded no likely significant effect. This conclusion has been agreed with NE.	No SPA bird records associated with this site.	H	No	No
Sites associated with Policy SL4 Kirkham and Wesham Strategic Location for Development						
HSS8 - The Pastures, Fleetwood Road, Wesham (built/ under construction)	Morecambe Bay SPA/Ramsar Ribble and Alt Estuaries SPA/Ramsar Martin Mere SPA/Ramsar	Consultation with NE by the applicant confirmed no likely significant effect on any European Sites as a result of the proposed development.	No SPA bird records associated with this site.	H	No	No
HSS9 - Land North of Blackpool Road, Kirkham (built/ under construction)	Morecambe Bay SPA/Ramsar Ribble and Alt Estuaries SPA/Ramsar Martin Mere SPA/Ramsar	Consultation with NE by the applicant confirmed no likely significant effect on any European Sites as a result of the proposed development.	Records for 600 black-headed gull, 200 lesser black-backed gull and 100 herring gull within the site. However, all recorded from one single date (in 2013), therefore no likely significant effect considered likely.	H	No	No

Local Plan Strategic Site	European Sites Potentially Affected	Project Level planning/ HRA information	Additional bird data review summary	Assessment Category	Potential for significant effect alone?	Potential for in-combination effects with other sites where planning permission has not yet been granted?
HSS10 - Willowfields, Derby Road, Wesham (built/ under construction)	Ribble and Alt Estuaries SPA/Ramsar	Fylde Council confirms no outstanding issues relating to ecology for this development	No SPA bird records associated with this site.	H	No	No
MUS3 - Mill Farm Sports Village, Fleetwood Road, Wesham (built/ under construction)	Morecambe Bay SPA/Ramsar Ribble and Alt Estuaries SPA/Ramsar Martin Mere SPA/Ramsar	Fylde Council confirms that ecology was only considered to include local effects, no HRA required, and no comment from NE.	No SPA bird records associated with this site.	H	No	No

Table 12 Detailed Screening of Fylde Local Plan Non-Strategic Sites in relation to European Sites within and outside of Fylde (planning permission in progress/granted)

Local Plan Non-Strategic Sites	European Sites Potentially Affected	Project level planning/HRA information	Assessment Category	Additional bird data review summary	Potential significant effect alone?	Potential for in-combination effects with new allocations?
Re-development, brown field sites or conversions adjacent to coastal areas						
HS2, HS6, HS8, HS9, HS21, HS23	Ribble and Alt Estuaries SPA/Ramsar	These sites are located adjacent to coastal areas and include conversions of existing buildings, demolition of existing building, or are located on hardstanding within an urban setting. NE have concluded no likely significant effect for all applications submitted associated with these sites (refer to Appendix C).	H	No SPA bird records associated with this site.	No	No
Re-development, brown field sites or conversions away from coastal areas						
HS3, HS4, HS5, HS7, HS10, HS11, HS12, HS13, HS14, HS22, HS26, HS28, HS30, HS31, HS37, HS56,	Ribble and Alt Estuaries SPA/Ramsar	These sites are located away from coastal areas and include conversions, re-development of brownfield sites, sub-division of existing properties or re-development of former urban areas. NE have concluded no likely significant effect for all applications submitted associated with these sites (refer to Appendix C).	H	No SPA bird records associated with this site.	No	No
Small pastoral/greenfield and caravan sites away from coastal areas						
HS15, , HS24, HS25, HS27, , HS32, HS38, HS39, HS40, HS41, HS44 HS45, HS46, HS47, HS49, HS50,	Ribble and Alt Estuaries SPA/Ramsar	These sites are located away from coastal areas and include small pastoral/ greenfield sites and caravan. NE have concluded no objection, or no likely significant effect in relation to HS24, HS25, HS27, HS39 and HS50. The remaining applications have had no comment from NE, or are awaiting further response.	H	No SPA bird records associated with this site.	No. Although not all sites have received comment from NE, given their small size, locations (away from coastal areas), and lack of SPA bird species recorded on, or near to the sites, no likely significant effects are considered likely.	No
Sites that have been completed or have been withdrawn						
HS1, HS16, HS17, HS18, HS19, HS20, HS29, HS33, HS34, HS35, HS36, HS42, HS43, HS48, HS53, HS54, HS55						

Table 13 Detailed screening of Fylde local plan strategic locations for development sites in relation to European sites within and outside Fylde (allocations with no planning permission)

Local Plan Strategic Site (Policy)	European Sites Potentially Affected	Site location description	Additional bird data review summary	Assessment Category	Potential Impacts	Potential for significant effect alone?	Potential for in-combination effects with other sites?	Conclusion
Sites associated with Policy SL2 Blackpool Periphery Strategic Location for Development								
MUS1 - Cropper Road East, Whitehills (SL2)	Morecambe Bay SPA/Ramsar Ribble and Alt Estuaries SPA/Ramsar Martin Mere SPA/Ramsar	Series of small fields close to existing industrial estate with scattered development to east, north and west, and a road to the south and west	No SPA bird records within these sites. Several records for pink-footed geese and other SPA species on land to the south and south-east from multiple data sources. Sites are not considered to represent functionally linked land (refer to Appendix C).	J	There is the potential for disturbance to species using adjacent functionally linked land through increased recreational pressure. The area considered to be functionally linked land does not have any public rights of way and is separated from these sites by roads and/or existing development. As such, the likelihood of a significant effect as a result of increased recreational pressure is considered to be negligible. Furthermore, the requirement for adequate green spaces for recreation to be incorporated into development proposals within Policy M1 will ensure potential impacts are minimised. Compliance with Policy ENV2 will ensure potential impacts upon designated sites are assessed and fully mitigated where necessary. This could include re-screening at the project-level, in order to update the bird information and to consider the implications of the detailed project proposals.	No	No	No likely significant effect
HSS5 - Cropper Road West, Whitehills (SL2)	Morecambe Bay SPA/Ramsar Ribble and Alt Estuaries SPA/Ramsar Martin Mere SPA/Ramsar	Series of small fields and existing industrial buildings close to existing industrial estate with scattered development to east, north and west and a road to the south and east		J		No	No	No likely significant effect
HSS6 - Land at Lytham St Annes Way, Whitehills (SL2)	Morecambe Bay SPA/Ramsar Ribble and Alt Estuaries SPA/Ramsar Martin Mere SPA/Ramsar	Situated between two roads forming an extension to an existing site.		J		No	No	No likely significant effect
Sites associated with Policy SL4 Kirkham and Wesham Strategic Location for Development								
HS28- Sunnybank Mill, Kirkham (SL4)	Ribble and Alt Estuaries SPA/Ramsar	Town centre location, redevelopment of existing buildings	No SPA bird species within this site and small number of records within 300m.	H	None anticipated	No	No	No likely significant effect
HSS9- Part of Kirkham Triangle (SL4)	Morecambe Bay SPA/Ramsar Ribble and Alt Estuaries SPA/Ramsar Martin Mere SPA/Ramsar	Edge of town development location between A-road and railway line	No SPA bird species within this site. Single record of a large flock of black-headed gull, lesser black-backed gull and herring gull from adjacent field and a single record of a small flock of pink-footed geese. Given the limited number of records, the adjacent fields are not considered to be functionally linked to the SPA.	J		No	No	No likely significant effect
Employment sites								
ES1 - Queensway Industrial Estate, Snowden Road, St Annes	Morecambe Bay SPA/Ramsar Ribble and Alt Estuaries SPA/Ramsar Martin Mere SPA/Ramsar	Extension of existing industrial estate adjacent to airport and major road.	No SPA species within this site. Single records of 125 whooper swan within 300m, to the east of the main road. Site lies within NE's SSSI IRZ for developments outside existing developed areas.	H	Whilst this site is within NE's SSSI IRZ for developments outside existing developed areas, given that the location is subject to existing disturbance from adjacent development and the limited bird records nearby, no significant effects would be anticipated. Compliance with Policy ENV2 will further ensure potential impacts upon designated sites are assessed and fully mitigated, where necessary. This could include re-screening at the project-level, in order to update the bird information and to consider the implications of the detailed project proposals.	No	No	No likely significant effect

Local Plan Strategic Site (Policy)	European Sites Potentially Affected	Site location description	Additional bird data review summary	Assessment Category	Potential Impacts	Potential for significant effect alone?	Potential for in-combination effects with other sites?	Conclusion
ES2 - Dock Road, Lytham	Ribble and Alt Estuaries SPA/Ramsar	Extension of existing industrial estate utilising brownfield site.	In close proximity to SPA boundary. Records of SPA species within 1km of these sites. Both sites within NE Goose Index Medium Areas; however, habitat within the sites themselves are not suitable for pink-footed geese.	H	Whilst these sites are located in close proximity to the SPA, they are within an existing industrial area which is already subject to disturbance from its current use. Converting these sites into an alternative form of employment land is considered unlikely to give rise to significant effects upon the SPA. Compliance with Policy ENV2 will further ensure potential impacts upon the designated site is assessed and fully mitigated, where necessary. This could include re-screening at the project-level, in order to update the bird information and to consider the implications of the detailed project proposals.	No	No	No likely significant effect
ES3 - Boundary Road, Lytham	Ribble and Alt Estuaries SPA/Ramsar	Brownfield site surrounded on all sides by existing industrial area and a main road.						
ES4 - Blackpool & Fylde Industrial Estate, Whitehills	Ribble and Alt Estuaries SPA/Ramsar	Infilling within an existing industrial estate	No SPA birds within this site, or within 300m of its boundary.	G	None anticipated	No	No	No likely significant effect
ES5 - Blackpool Airport, Squires Gate Lane, Blackpool Airport Corridor	Ribble and Alt Estuaries SPA/Ramsar	Infilling within an existing industrial estate						
ES6 - ITSA, Brunel Way, Whitehills	Ribble and Alt Estuaries SPA/Ramsar	In-filling open areas within an employment area	No SPA bird records within this site. Records of gull species to the north within areas already industrialised and therefore subject to high levels of disturbance.	G	None anticipated	No	No	No likely significant effect
ES7 - Whitehills Business Park, Whitehills	Ribble and Alt Estuaries SPA/Ramsar	In-filling open areas within industrial estate						

* Assessment of functionally linked land based on review of relevant bird data sources to determine likelihood of land being considered to be functionally linked to the SPA

Table 14 Detailed Screening of Fylde Local Plan Non-Strategic Sites (outside the Strategic Locations for Development) with respect to European Sites within and outside of Fylde (allocations with no planning permission)

Local Plan Non-Strategic Sites	European Sites Potentially Affected	Site location description	Additional bird data review summary	Assessment Category	Potential Impacts	Potential for significant effect alone?	Potential for significant in-combination effects with new sites?	Conclusion
HS38 Lower Lane, Freckleton	Ribble and Alt Estuaries SPA/Ramsar	Development of improved grassland field adjacent to existing dwellings. Open farmland to south.	No SPA birds within this site, or within 300 m of its boundary.	H	None anticipated	No	No	No likely significant effect
HS41 Thornfield Caravan Park, Staining	Ribble and Alt Estuaries SPA/Ramsar	Redevelopment of an existing caravan park, surrounded on all sides by development.	No SPA birds within this site, or within 300 m of its boundary.	H	None anticipated	No	No	No likely significant effect
HS51 Newton Hall, School Lane, Newton	Ribble and Alt Estuaries SPA/Ramsar	Southern edge of Newton-with-Scales	Records of curlew 85 (2010), shelduck 52 (2010), teal 40 (2014), and pink-footed goose 310 (2014) within 300 m of these sites.	K	Disturbance to species through increased recreational pressure as a result of increased use of public footpaths close to functionally linked land to the south of the site. Disturbance to species utilising adjacent functionally linked land as a result of construction activities.	No	No	No likely significant effect
HS52 Cobweb Barn, Oak Lane, Newton	Ribble and Alt Estuaries SPA/Ramsar	Western edge of Newton-with-Scales		K	Compliance with Policy ENV2 will further ensure potential impacts upon designated sites are assessed and fully mitigated where necessary. This could include re-screening at the project-level, in order to update the bird information and to consider the implications of the detailed project proposals.	No	No	No likely significant effect
Elswick NDP	Ribble and Alt Estuaries SPA/Ramsar	No individual locations identified, likely to be adjacent to existing developed areas.	Records of lesser black-backed gull 60 (2013), and curlew 14 (2014) within 300 m of this site.	N/A	None anticipated	No	No	No likely significant effect
ES8- Naze Lane, Freckleton	Ribble and Alt Estuaries SPA/Ramsar	Small extension to existing employment site	No records of SPA birds within this site, but close proximity to SPA boundary. Large number of SPA bird records within the vicinity of the site (at the edge of the Estuary).	I	Disturbance to species utilising adjacent functionally linked land as a result of construction activities could occur. However, it is considered unlikely that these impacts would be of sufficient magnitude to lead to a significant effect upon the adjacent European site. No other sites would affect the same functionally linked land, therefore no in-combination would occur. Compliance with Policy ENV2 will further ensure potential impacts upon designated sites are assessed and fully mitigated where necessary. This could include re-screening at the project-level, in order to update the bird information and to consider the implications of the detailed project proposals.	No	No	No likely significant effect

6.6 Screening Summary

6.6.1 Following the initial screening of the Fylde Local Plan, a number of policies were screened out completely from further assessment. This was on the basis either of no identifiable impact pathway linking the policies with the European Sites, or that there will be no foreseeable adverse impact on European sites through Policy implementation (refer to Table 8) all of the strategic and non-strategic sites were carried forward into the detailed screening assessment.

6.6.2 Potential impacts identified comprised:

- Direct habitat and species loss within European sites.
- Habitat degradation as a result of increased air pollution.
- Loss of habitat functionally linked to a European site (i.e. used by overwintering birds for foraging, in particular pink-footed geese).
- Disturbance to habitats and species through increased recreational activity, during the operational stage.
- Changes in water quality where sites are hydrologically linked to European sites.
- Disturbance to species as a result of construction activities/ operational stage.

6.6.3 It is considered that any air quality, water quality or hydrological effects that may arise from the Fylde Local Plan policies are very unlikely to be significant, given the distance between the European Sites and the majority of the development sites. The implementation of standard mitigation measures that are required of developments (such as pollution prevention) to meet with National Policies and frameworks also provide a further 'safety net' to ensure that significant damage to European Sites is avoided.

Local Plan Policies

6.6.4 Policies were selected for further (detailed) screening on the basis that there may be potential impacts on European Sites if they are implemented without any mitigation or avoidance measures. This has also included a categorisation of the potential effects in line with current guidance¹¹ (refer to Table 10). Where a policy is implemented through another policy within the Fylde Local Plan (which specifies particular strategic sites), the potential for significant effects on European sites have been categorised in accordance with the classification for the other policy. In this instance, policies DLF1 and EC1 are implemented through the Strategic Locations for Development policies SL1 to SL5 (refer to Table 10).

6.6.5 The outcome of the detailed assessment for the strategic sites proposed within each of the policies SL1 to SL5 identified one site within SL2 for which significant effects could not be ruled out (this site (HSS4) is discussed in detailed within paragraph 6.6.9 below). The detailed assessment of Policies SL1, SL3, SL4 and SL5, and the employment sites (which relate to EC1) concluded no likely significant effects on European Sites. This was on the basis that these sites have already gone through the planning process and appropriate mitigation/compensation has been put in place to ensure no likely significant effects. Although some additional bird records have been identified for HSS1, MUS2 and HSS9 (refer to Table 11), the project-level HRAs for these sites have taken these species into consideration and therefore no previously unassessed impacts have been identified, and the conclusion of no likely significant effects on European Sites is considered appropriate.

6.6.6 No significant effects on European sites are considered likely as a result of the Policies GD4 and GD5 (General Development Policies). Potential impacts associated with these policies relate to air quality, water quality or hydrological effects, which as described previously, would be readily avoided through standard mitigation measures that are required of developments (such as pollution prevention).

6.6.7 For the remaining policies (EC4, EC5, T1, and T3), it is not possible to conclude no likely significant effects, as sufficient information to inform the assessment (such as specific project proposals) is not currently available at this stage of the Fylde Local Plan. However, it is acknowledged that any changes facilitated by these policies would be required to take into account other policies within the Local Plan. Specifically, individual projects would be required to adhere to Policy ENV2. Policy ENV2 states that

¹¹ The Habitats Regulations Assessment of Local Plan Documents. David Tyldesley and Associates for Natural England (2015).

where significant effects upon a European site cannot '*be avoided, adequately mitigated or, as a last resort, replaced or compensated, then planning permission will be refused*'.

- 6.6.8 Any new proposals would therefore need to comply with Policy ENV2 to ensure an assessment of potential effects upon European Sites is undertaken. At the project-level, more detailed information about each site would be available (including any more recent bird records as well as details of the project proposals themselves), and therefore a more informed assessment could be made of the potential effects on European sites. If it cannot be demonstrated at the project-level that there would be no significant effects on European Sites, planning consent will not be granted.

Local Plan sites with planning permission granted/in-progress

- 6.6.9 The detailed screening of the Fylde Local Plan strategic and non-strategic sites (refer to Table 11 and Table 12) has identified one site (HSS4) that has the potential for significant effects on the Ribble and Alt Estuaries SPA/Ramsar. Further HRA Screening at the project-level has been undertaken of this site which concluded that an Appropriate Assessment was required, as the potential for a significant effect (in relation to recreational pressure) could not be ruled out. NE were in agreement with this. In order for planning consent to be granted, the project would need to comply with Policy ENV2. Further project-level HRA (in the form of an Appropriate Assessment) will therefore need to be undertaken for this site and further mitigation/compensation put in place to avoid any potential impacts on European Sites, before planning consent can be obtained.
- 6.6.10 No significant effects on European sites were considered likely as a result of the development of the remaining strategic and non-strategic sites (with planning permission granted/in-progress) within the Local Plan. As stated in paragraph 6.6.5 above, this is on the basis that sites with planning permission have already gone through the planning process and appropriate mitigation/compensation put in place to ensure no likely significant effects on European Sites. The review of planning applications and associated documentation, and additional bird data, did not identify any previously unassessed impacts.

Local Plan sites with no planning permission (allocations)

- 6.6.11 The detailed screening of the Fylde Local Plan strategic and non-strategic sites with no planning permission (refer to Table 13 and Table 14) has identified two allocations which have the potential for significant effects on the Ribble and Alt Estuaries SPA/Ramsar (HS51 and HS52).
- 6.6.12 HS51 and HS52 are in close proximity to each other, and to an area of land which could be considered to be functionally linked to the Ribble and Alt Estuaries SPA (the review of bird information identified a number of SPA bird species within fields to the south of the site (refer to Appendix C)). Together these sites are proposed to provide 115 homes. Although there is the potential for significant effects as a result of these two developments, any planning applications that are forthcoming in relation to these sites would need to comply with Policy ENV2 (which identifies the need to ensure no potential impacts on European Sites prior to planning permission being granted). No significant effects on European Sites are therefore likely as a result of development of HS51 and HS52, assuming compliance with Policy ENV2.
- 6.6.13 For the remaining strategic and non-strategic sites with no planning permission in place, no significant effects on European sites are considered likely. This is on the basis that the sites are generally small-scale and located in areas which are currently subject to existing levels of noise and visual disturbance (i.e. are on the edge of existing urban settings, and/or are adjacent to the existing road network). Coupled with this, the review of bird data collated to inform this assessment did not indicate that any of these sites were within, or directly adjacent to, areas considered likely to represent functionally-linked land for SPA bird species. In addition, compliance with Policy ENV2 will further ensure potential impacts upon European Sites are assessed and fully mitigated, where necessary. This would likely include re-screening at the project-level, in order to update the bird information and to consider the implications of the detailed project proposals (which are not available at the allocation stage).

6.7 In-Combination Effects

- 6.7.1 The HRA needs to consider not only the 'screened in' policies and sites (strategic and non-strategic) within the Fylde Local Plan that may lead to significant impacts upon European sites on their own, but

also those that may have a significant impact in combination with other plans and projects within the local area. Table 15 outlines relevant plans and projects that were considered in-combination with the Fylde Local Plan.

- 6.7.2 In addition, it is also necessary to consider in-combination effects between the various elements of the Fylde Local Plan itself.

Fylde Local Plan

Policies

- 6.7.3 It is considered that any potential in-combination effects associated with the policies could be resolved through ensuring that each policy takes into consideration other policies within the plan which serve to protect the European sites from adverse effects.
- 6.7.4 At the project-level, more detailed information about each site would be available, and therefore a more informed assessment could be made of the potential in-combination effects on European sites. Therefore, assuming appropriate mitigation and compensation measures are put in place at the project-level, it is considered unlikely that there would be significant in-combination effects between the policies within the Fylde Local Plan on European sites.

Strategic and non-strategic sites

- 6.7.5 It is considered unlikely that there would be significant in-combination effects on European sites as a result of the development of the strategic and non-strategic sites listed with Fylde Local Plan. Further detailed assessments including consultation with NE, and in some cases HRA screening at the project-level, have been undertaken of several strategic sites (refer to Table 11). In all instances where HRA has been undertaken, it was determined that there would be no significant effects on European sites either alone or in-combination with other plans or projects inside or outside of Fylde.
- 6.7.6 The only sites where in-combination effects cannot be ruled are those which have not undergone a project-level HRA. In order to comply with Policy ENV2, projects with the potential for significant effects upon a European site would require an HRA, and therefore any in-combination effects that could arise from these developments would need to be appropriately mitigated in order for planning consent to be granted.

6.8 Other Plans and projects

- 6.8.1 Only the effects of other plans or projects which (like those of the plan under consideration here) alone would not be likely to be significant, need to be included in the in-combination assessment. If the effects of other plans or projects will already be significant on their own, they are not added to those associated with the Fylde Local Plan.
- 6.8.2 The detailed screening exercise has identified that the potential exists for effects on European sites, associated with various elements of the Fylde Local Plan. However, the inclusion of Policy ENV2 safeguards the designated sites from any projects that have potentially damaging effects which cannot be avoided or mitigated from being consented. Those effects with the potential to be significant are disturbance effects on birds during the construction and operation of new developments, the potential loss of important foraging habitat, and possible disturbance effects associated with increased recreational pressures on the European sites or functionally linked land.
- 6.8.3 To be relevant to the in-combination assessment, the residual effects of other plans or projects will need to either make the unlikely effects of the Fylde Local Plan likely, or insignificant effects of the plan significant, or both. An assessment has therefore been made of the 'other' plans and projects listed in Table 15 with a view to determining whether or not they would result in impacts which, in combination with the policies set out in the Fylde Local Plan could lead to significant disturbance, loss of foraging habitat for the birds associated with European sites or increased recreational pressures.
- 6.8.4 Of the plans reviewed, Table 15 illustrates the plans/projects that have been identified as potentially having an in-combination effect.

Table 15: In-combination effects

Plan/project	Potential effect of plan/Policy	Conclusion
Blackpool Council Local Plan	<p>Provides for 4,200 dwellings and the safeguarding of around 13.5ha of employment land (of which 14ha is provided by Fylde), enhancing these sites with new employment development on remaining available land and through redevelopment. Also, proposed enterprise zone at Blackpool Airport. Land-take has the potential to adversely affect land which may be functionally linked to European Sites.</p> <p>Policy DE1 concerns the promotion of Blackpool Business Park adjacent to Blackpool International Airport. The proximity of Blackpool International Airport to the Ribble and Alt Estuaries SPA/ Ramsar means that any further development at this location has the potential to increase disturbance of birds using the designated habitats adjacent to the site. This Policy may have in-combination impacts with Policy T2 (Blackpool International Airport) and Policy SL2 (Blackpool strategic location for development) of the Fylde Local Plan.</p> <p>The plan also includes extension of the Blackpool Tramway from the promenade at North Pier to Blackpool North railway station. However, all works would be within an urban setting and therefore no adverse effects on Europeans Sites are anticipated.</p>	Assuming Policy ENV2 is implemented, no significant in-combination impacts are considered likely.
Wyre Council	<p>The Local Plan assessed the need for 340-485 dwellings per annum, and improvements to the A585 (Skippool – Windy Harbour Improvements). Land-take has the potential to adversely affect land which may be functionally linked to European Sites. Increases in recreational pressure (as a result of road construction making it easier to reach the Ribble and Alt Estuaries SPA/Ramsar) may also adversely affect the birds through increased disturbance.</p> <p>Hillhouse Enterprise Zone comprises a mixed-use development of 137.75ha. The sites is under construction, and comprises appropriate mitigation to ensure no significant impacts.</p>	Assuming Policy ENV2 is implemented, no significant in-combination impacts are considered likely.
Lancaster City Council	<p>The Local Plan assessed the need for 13,000 – 14,000 new homes and the Heysham to M6 Link (under construction). Land-take has the potential to adversely affect land which may be functionally linked to European Sites. Increases in recreational pressure (as a result of road construction making it easier to reach the Ribble and Alt Estuaries SPA/Ramsar) may also adversely affect the birds through increased disturbance.</p>	Assuming Policy ENV2 is implemented, no significant in-combination impacts are considered likely.
Lancashire County Council	<p>Land-take associated with the Lancashire Minerals and Waste Local Plan Site Allocations and Development Management Policies Local Plan has the potential to adversely affect land which may be functionally linked to European Sites.</p>	Assuming Policy ENV2 is implemented, no significant in-combination impacts are considered likely.

Plan/project	Potential effect of plan/Policy	Conclusion
Preston City Council	<p>The plan provides a total requirement of 8,637 dwellings, 99.52ha of employment land, and road improvements at Junction 2 on M55 plus Preston Western Distributor Road, Cottam Parkway Railway Station accessed off Preston Western Distributor; and Broughton By Pass.</p> <p>Land-take has the potential to adversely affect land which may be functionally linked to European Sites. Increases in recreational pressure (as a result of road construction making it easier to reach the Ribble and Alt Estuaries SPA/Ramsar) may also adversely affect the birds through increased disturbance.</p>	Assuming Policy ENV2 is implemented, no significant in-combination impacts are considered likely.
West Lancashire District Council	<p>The Local Plan 2012- 2027 identifies a need for 4,860 new dwellings and 75ha of employment land.</p> <p>Land-take has the potential to adversely affect land which may be functionally linked to European Sites. Increases in recreational pressure (for example as a result of increased housing and associated transport links making it easier to reach the Ribble and Alt Estuaries SPA/Ramsar) may also adversely affect the birds through increased disturbance.</p>	Assuming Policy ENV2 is implemented, no significant in-combination impacts are considered likely.
South Ribble Council	<p>The plan includes the road improvements schemes for duelling the A582 from Penwortham to Farington and completion of Penwortham bypass.</p> <p>Possible land-take for the Penwortham bypass, however, this is currently under construction. Land-take for duelling of the A582 likely to be small. No significant impacts on European sites envisaged.</p>	Assuming Policy ENV2 is implemented, no significant in-combination impacts are considered likely.
Sefton Council	<p>A total requirement for 11,070 dwellings, plus 84.5ha of employment land. Land-take has the potential to adversely affect land which may be functionally linked to European Sites.</p> <p>Increases in recreational pressure (as a result of road construction making it easier to reach the Ribble and Alt Estuaries SPA/Ramsar) may also adversely affect the birds through increased disturbance.</p>	Assuming Policy ENV2 is implemented, no significant in-combination impacts are considered likely.
Dong Energy	<p>Walney offshore wind farm and west of Duddon sands wind farm are already in use, and the extension to Walney is currently under construction. Wind farm developments have the potential to effect mobile species associated with European sites, such as qualifying features of Morecombe Bay SPA/Ramsar, Ribble and Alt Estuaries SPA/ Ramsar and Marin Mere SPA/ Ramsar site.</p>	No in-combination effects of the offshore wind farm on land based developments are considered likely. Therefore, there would be no in-combination effects associated with these developments.

Plan/project	Potential effect of plan/Policy	Conclusion
North West Coastal Connections	Construction of a new power station and associated connections. Power will be transmitted via a crossing under Morecambe Bay to the new Middleton substation at Heysham, Lancashire. Potential impacts on European sites through fragmentation effects, disturbance during construction, collision with power cables and loss of functionally linked land. However, the only potential in-combination effect with the Fylde Local Plan would be through loss of functionally linked land.	Project-level HRA being undertaken for this Scheme. Sufficient mitigation/compensation would be incorporated to ensure no significant effect on European Sites, therefore, any in-combination impacts considered unlikely.

7 Conclusion

- 7.1.1 This HRA Screening of the Preferred Option Local Plan for Fylde Borough has considered the potential implications of the plan for European Sites within and near to the Borough boundary.
- 7.1.2 The detailed screening has identified where potential impacts of some of the policies could occur; however, the inclusion of Policy ENV2 and the safeguards provided to protect European sites from harm within this policy will ensure that any projects (planning applications) which cannot avoid, mitigate or compensate significant adverse effects would not be consented.
- 7.1.3 The detailed screening of the Fylde Local Plan strategic sites (refer to Table 11 and Table 13) has identified one Strategic Location for Development (HSS4) that has the potential for significant effects on the Ribble and Alt Estuaries SPA/Ramsar. Further HRA Screening at the project-level has been undertaken of this site which concluded that an Appropriate Assessment was required as the potential for a significant effect (in relation to recreational pressure) could not be ruled out. NE were in agreement with this. None of the remaining strategic and non-strategic sites were considered likely to have significant effects on European sites alone, or in combination with other elements of the Fylde Local Plan or with other plans and projects adjacent to Fylde. Many of the sites within the Local Plan have already been granted planning permission and have assessed the likelihood of a significant effect upon the European sites. Where such impacts were considered likely, HRA has been undertaken, all of which have concluded no likely significant effects.
- 7.1.4 The assessment of in-combination effects of the Fylde Local Plan itself, and the various plans and policies revealed that, providing the policies comply with Policy ENV2 and that project-level HRA is undertaken where necessary, it is not considered that the Fylde Local Plan would contribute to significant in-combination effects.
- 7.1.5 It has, therefore, been concluded that, assuming appropriate mitigation and compensation measures are implemented at the project level, the Fylde Local Plan is unlikely to have any significant effects on the European sites identified, either alone or in-combination with other plans or projects.
- 7.1.6 We seek NE's opinion and agreement or otherwise with this conclusion.

APPENDIX A

European Sites within and surrounding Fylde

Table A1: European Sites that could be adversely affected by the Local Plan

Site Name	Qualifying Features		Current Condition and Vulnerability ¹²	Site Condition Assessment March 2013
	Habitats	Species		
Morecambe Bay SAC	<p>Annex I habitats that are a primary reason for selection of this site</p> <ul style="list-style-type: none"> ▪ Estuaries ▪ Mudflats and sandflats not covered by seawater at low tide ▪ Large shallow inlets and bays ▪ Perennial vegetation of stony banks ▪ Salicornia and other annuals colonising mud and sand ▪ Atlantic salt meadows (<i>Glaucopuccinellietalia maritima</i>) ▪ Shifting dunes along the shoreline with <i>Ammophila arenaria</i> ('white dunes') ▪ Fixed dunes with herbaceous vegetation ('grey dunes') * Priority feature ▪ Humid dune slacks <p>Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site</p> <ul style="list-style-type: none"> ▪ Sandbanks which are slightly covered by sea water all the time ▪ Coastal lagoons * Priority feature ▪ Reefs ▪ Embryonic shifting dunes 	<p>Annex II species that are a primary reason for selection of this site</p> <p>Great crested newt <i>Triturus cristatus</i></p>	<p>There are a wide range of pressures on Morecambe Bay but the site is relatively robust and many of these pressures have only slight or local effects on its interests. Positive management is being secured through NGO reserve management plans, Natural England's Site Management Statements and Coastal Wildlife Enhancement Scheme, the European Marine Site Management Schemes for the Duddon Estuary and Morecambe Bay, and the Duddon Estuary and Morecambe Bay Partnerships. These aim for sustainable use of the site, taking account of the potential threats including commercial fisheries, aggregate extraction, gas exploration, recreation and other activities.</p>	<p>Area favourable 94.23%</p> <p>Area unfavourable but recovering 5.77%</p> <p>Area unfavourable no change 0%</p> <p>Area unfavourable declining 0%</p> <p>Area destroyed / part destroyed 0%</p>

¹² Taken from Natura 2000 Standard Data Forms (SAC and SPA) and Ramsar Information Sheets.

Site Name	Qualifying Features		Current Condition and Vulnerability ¹²	Site Condition Assessment March 2013
	Habitats	Species		
	<ul style="list-style-type: none"> ▪ Atlantic decalcified fixed dunes (<i>Calluno-Ulicetea</i>) * Priority feature ▪ Dunes with <i>Salix repens ssp. argentea</i> (<i>Salicion arenariae</i>) 			
Morecambe Bay SPA	N/A	<p>This site qualifies under Article 4.1 of the Directive (79/409/EEC) by supporting populations of European importance of the following species listed on Annex I of the Directive:</p> <p>During the breeding season;</p> <ul style="list-style-type: none"> ▪ Little Tern <i>Sterna albifrons</i> ▪ Sandwich Tern <i>Sterna sandvicensis</i>, <p>Over winter;</p> <ul style="list-style-type: none"> ▪ Bar-tailed Godwit <i>Limosa lapponica</i> ▪ Golden Plover <i>Pluvialis apricaria</i>, <p>This site also qualifies under Article 4.2 of the Directive (79/409/EEC) by supporting populations of European importance of the following migratory species:</p> <p>During the breeding season;</p> <ul style="list-style-type: none"> ▪ Herring Gull <i>Larus argentatus</i> ▪ Lesser Black-backed Gull <i>Larus fuscus</i> <p>On passage;</p> <ul style="list-style-type: none"> ▪ Ringed Plover <i>Charadrius hiaticula</i> ▪ Sanderling <i>Calidris alba</i> <p>Over winter;</p> <ul style="list-style-type: none"> ▪ Curlew <i>Numenius arquata</i> ▪ Dunlin <i>Calidris alpina</i> ▪ Grey Plover <i>Pluvialis squatarola</i> 	<p>The site is subject to a wide range of pressures such as land-claim for agriculture, overgrazing, dredging, overfishing, industrial uses and unspecified pollution. However, overall the site is relatively robust and many of those pressures have only slight to local effects and are being addressed through Management Plans. The breeding tern interest is very vulnerable and the colony has recently moved to the adjacent Duddon Estuary. Positive management is being secured through management plans for non-governmental organisation reserves, Natural England's Site Management Statements, European Marine Site Management Scheme, and the Morecambe Bay Partnership.</p>	See above.

Site Name	Qualifying Features		Current Condition and Vulnerability ¹²	Site Condition Assessment March 2013
	Habitats	Species		
		<ul style="list-style-type: none"> ▪ Knot <i>Calidris canutus</i> ▪ Oystercatcher <i>Haematopus ostralegus</i>, ▪ Pink-footed Goose <i>Anser brachyrhynchus</i> ▪ Pintail <i>Anas acuta</i> ▪ Redshank <i>Tringa totanus</i> ▪ Shelduck <i>Tadorna</i> ▪ Turnstone <i>Arenaria interpres</i> <p>Assemblage qualification: A seabird assemblage of international importance</p> <p>The area qualifies under Article 4.2 of the Directive (79/409/EEC) by regularly supporting at least 20,000 seabirds</p> <p>During the breeding season, the area regularly supports 61,858 individual seabirds (5 year peak mean for 1991/92 to 1995/96) including: Herring Gull <i>Larus argentatus</i>, Lesser Black-backed Gull <i>Larus fuscus</i>, Little Tern <i>Sterna albifrons</i>, Sandwich Tern <i>Sterna sandvicensis</i>.</p> <p>Assemblage qualification: A wetland of international importance.</p> <p>The area qualifies under Article 4.2 of the Directive (79/409/EEC) by regularly supporting at least 20,000 waterfowl</p> <p>Over winter, the area regularly supports 210,668 individual waterfowl (5 year peak mean for 1991/92 to 1995/96)</p>		

Site Name	Qualifying Features		Current Condition and Vulnerability ¹²	Site Condition Assessment March 2013
	Habitats	Species		
Morecambe Bay Ramsar site	N/A	<p>Ramsar criterion 4</p> <p>The site is a staging area for migratory waterfowl including internationally important numbers of passage ringed plover <i>Charadrius hiaticula</i>.</p> <p>Ramsar criterion 5</p> <p>Assemblages of international importance:</p> <p>Species with peak counts in winter:</p> <p>223709 waterfowl (5 year peak mean 1998/99-2002/2003)</p> <p>Ramsar criterion 6 – species/populations occurring at levels of international importance.</p> <p>Qualifying Species/populations (as identified at designation):</p> <p>Species regularly supported during the breeding season:</p> <ul style="list-style-type: none"> ▪ Lesser black-backed gull , <i>Larus fuscus graellsii</i>, ▪ Herring gull , <i>Larus argentatus</i> ▪ Sandwich tern , <i>Sterna (Thalasseus) sandvicensis</i> <p>Species with peak counts in spring/autumn:</p> <ul style="list-style-type: none"> ▪ Great cormorant , <i>Phalacrocorax carbo</i> ▪ Northern pintail , <i>Anas acuta</i>, ▪ Common eider , <i>Somateria mollissima mollissima</i>, ▪ Eurasian oystercatcher, <i>Haematopus ostralegus</i>, ▪ Ringed plover , <i>Charadrius hiaticula</i>, 	N/A	See above.

Site Name	Qualifying Features		Current Condition and Vulnerability ¹²	Site Condition Assessment March 2013
	Habitats	Species		
		<ul style="list-style-type: none"> ▪ Grey plover , <i>Pluvialis squatarola</i>, ▪ Sanderling , <i>Calidris alba</i>, ▪ Eurasian curlew , <i>Numenius arquata</i>, ▪ Common redshank , <i>Tringa totanus</i>, ▪ Ruddy turnstone , <i>Arenaria interpres</i>, ▪ Lesser black-backed gull , <i>Larus fuscus graellsii</i>, <p>Species with peak counts in winter:</p> <ul style="list-style-type: none"> ▪ Great crested grebe , <i>Podiceps cristatus</i>, ▪ Pink-footed goose , <i>Anser brachyrhynchus</i> ▪ Eurasian wigeon , <i>Anas Penelope</i> ▪ Common goldeneye , <i>Bucephala clangula</i>, ▪ Red-breasted merganser , <i>Mergus serrator</i> ▪ European golden plover , <i>Pluvialis apricaria</i>, ▪ Northern lapwing , <i>Vanellus</i>, ▪ Red knot , <i>Calidris canutus islandica</i>, ▪ Dunlin , <i>Calidris alpina</i>, ▪ Bar-tailed godwit , <i>Limosa lapponica</i>, 		
Ribble and Alt Estuaries SPA	N/A	<p>This site qualifies under Article 4.1 of the Directive (79/409/EEC) by supporting populations of European importance of the following species listed on Annex I of the Directive:</p> <p>During the breeding season;</p> <ul style="list-style-type: none"> ▪ Common Tern <i>Sterna hirundo</i> ▪ Ruff <i>Philomachus pugnax</i>, <p>Over winter;</p>	<p>Overall, the dunes, intertidal flats and saltmarsh enjoy a relatively robust status and a favourable condition. However, the site is, in places, subject to pressure from recreation, built development (including coastal defence), wildfowling and industry, including sand-winning. Wildfowling is not considered to have a significant impact in terms of direct take; resulting disturbance is</p>	<p>Area favourable 99.10% Area unfavourable but recovering 0% Area unfavourable no change 0.90% Area unfavourable declining 0%</p>

Site Name	Qualifying Features		Current Condition and Vulnerability ¹²	Site Condition Assessment March 2013
	Habitats	Species		
		<ul style="list-style-type: none"> ▪ Bar-tailed Godwit <i>Limosa lapponica</i> ▪ Bewick's Swan <i>Cygnus columbianus bewickii</i> ▪ Golden Plover <i>Pluvialis apricaria</i>, ▪ Whooper Swan <i>Cygnus</i>, <p>This site also qualifies under Article 4.2 of the Directive (79/409/EEC) by supporting populations of European importance of the following migratory species:</p> <p>During the breeding season;</p> <ul style="list-style-type: none"> ▪ Lesser Black-backed Gull <i>Larus fuscus</i> <p>On passage;</p> <ul style="list-style-type: none"> ▪ Ringed Plover <i>Charadrius hiaticula</i> ▪ Sanderling <i>Calidris alba</i> <p>Over winter;</p> <ul style="list-style-type: none"> ▪ Black-tailed Godwit <i>Limosa islandica</i> ▪ Dunlin <i>Calidris alpina</i> ▪ Grey Plover <i>Pluvialis squatarola</i> ▪ Knot <i>Calidris canutus</i> ▪ Oystercatcher <i>Haematopus ostralegus</i>, ▪ Pink-footed Goose <i>Anser brachyrhynchus</i> ▪ Pintail <i>Anas acuta</i> ▪ Redshank <i>Tringa totanus</i> ▪ Sanderling <i>Calidris alba</i> ▪ Shelduck <i>Tadorna</i> ▪ Teal <i>Anas crecca</i> ▪ Wigeon <i>Anas penelope</i> <p>Assemblage qualification: A seabird assemblage of international importance</p>	<p>effectively managed through the provision of refuge areas and strict regulation on shooting activities. Military activities only take place at Altcar Rifle Range which is adjacent to the Alt Estuary. Recreation is informal and of relatively low intensity along most of the Sefton Coast and in the Ribble Estuary. There is no longer a registered beach airfield at Sefton, however occasional landing of pleasure craft may be requested during large events. Beach activities are managed by the Beach Management Plan. Sand-winning was addressed during a Public Inquiry in August 2001, with the result that detailed environmental monitoring will now be incorporated into the renewed planning permission. Much of the site attracts beneficial land management via the implementation of agreed plans for three NNRs, two LNRs and other initiatives developed by the Sefton Coast Partnership. These plans/initiatives are addressing a number of these pressures, whilst other pressures will be addressed following procedures under the Habitat Regulations. Wider land management issues are being developed via the neighbouring Ribble and Mersey Estuary Strategies. The issue of grazing pressure on the saltmarsh will be addressed through a management agreement to reduce the grazing pressure.</p>	<p>Area destroyed / part destroyed 0%</p>

Site Name	Qualifying Features		Current Condition and Vulnerability ¹²	Site Condition Assessment March 2013
	Habitats	Species		
		<p>The area qualifies under Article 4.2 of the Directive (79/409/EEC) by regularly supporting at least 20,000 seabirds</p> <p>During the breeding season, the area regularly supports 29,236 individual seabirds.</p> <p>Assemblage qualification: A wetland of international importance.</p> <p>The area qualifies under Article 4.2 of the Directive (79/409/EEC) by regularly supporting at least 20,000 waterfowl</p>	<p>Although there is little evidence of sea-level rise so far, the extent and distribution of habitats remains vulnerable to changes in the physical environment, either natural or man-induced. In contrast the coast at Formby Point and Ainsdale is suffering intense erosion which is being investigated through the Sefton Shoreline Management Plan, and beach management practices have effectively encouraged the creation of considerable areas of embryo dunes on the upper shore elsewhere. The Ribble Estuary is also evolving as sediment patterns are changing and saltmarsh continues to accrete following past land-claim and the closure of Preston Docks. The intertidal habitats are vulnerable to accidental pollution from the nearby Mersey Estuary and the Irish Sea oil and gas fields. Oil spill contingency plans are being updated to deal with such events. The Ribble in particular has failed to meet the requirements of the Bathing Waters Directive. Government Office North West and the Environment Agency are investigating likely sources of pollution that may have caused this.</p>	
Ribble and Alt Estuaries Ramsar site	N/A	<p>Ramsar criterion 2</p> <p>This site supports up to 40% of the Great Britain population of natterjack toads <i>Bufo calamita</i>.</p> <p>Ramsar criterion 5</p>	<p>Coastal erosion is a factor at Formby Point with an estimated loss of 4 metres per year. It is a concern because pine woodland on the sand dunes is causing coastal squeeze and therefore preventing sand dune habitats</p>	See above.

Site Name	Qualifying Features		Current Condition and Vulnerability ¹²	Site Condition Assessment March 2013
	Habitats	Species		
		<p>Assemblages of international importance: Species with peak counts in winter: 222,038 waterfowl</p> <p>Ramsar criterion 6</p> <p>Species/populations occurring at levels of international importance.</p> <p>Qualifying Species/populations (as identified at designation): Species regularly supported during the breeding season:</p> <ul style="list-style-type: none"> ▪ Lesser black-backed gull , <i>Larus fuscus graellsii</i>, <p>Species with peak counts in spring/autumn:</p> <ul style="list-style-type: none"> ▪ Ringed plover , <i>Charadrius hiaticula</i>, ▪ Grey plover , <i>Pluvialis squatarola</i> ▪ Red knot , <i>Calidris canutus islandica</i> ▪ Sanderling , <i>Calidris alba</i> ▪ Dunlin , <i>Calidris alpina</i> ▪ Black-tailed godwit , <i>Limosa islandica</i> ▪ Common redshank , <i>Tringa totanus</i>, ▪ Lesser black-backed gull , <i>Larus fuscus graellsii</i>, <p>Species with peak counts in winter:</p> <ul style="list-style-type: none"> ▪ Tundra swan , <i>Cygnus columbianus bewickii</i> ▪ Whooper swan , <i>Cygnus</i> ▪ Pink-footed goose , <i>Anser brachyrhynchus</i> ▪ Common shelduck , <i>Tadorna</i> ▪ Eurasian wigeon , <i>Anas penelope</i> ▪ Eurasian teal , <i>Anas crecca</i> 	<p>from rolling back; as such dune slack habitats for natterjack toads are declining/being lost.</p>	

Site Name	Qualifying Features		Current Condition and Vulnerability ¹²	Site Condition Assessment March 2013
	Habitats	Species		
		<ul style="list-style-type: none"> ▪ Northern pintail , <i>Anas acuta</i> ▪ Eurasian oystercatcher , <i>Haematopus ostralegus</i> ▪ Bar-tailed godwit , <i>Limosa lapponica</i> 		
Sefton Coast SAC	<p>Annex I habitats that are a primary reason for selection of this site</p> <ul style="list-style-type: none"> ▪ Embryonic shifting dunes ▪ Shifting dunes along the shoreline with <i>Ammophila arenaria</i> (‘white dunes’) * ▪ Fixed dunes with herbaceous vegetation (‘grey dunes’) * Priority feature ▪ Dunes with <i>Salix repens</i> ssp. <i>argentea</i> (<i>Salicion arenariae</i>) ▪ Humid dune slacks <p>Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site</p> <ul style="list-style-type: none"> ▪ Atlantic decalcified fixed dunes (<i>Calluno-Ulicetea</i>) * Priority feature 	<p>Annex II species that are a primary reason for selection of this site</p> <ul style="list-style-type: none"> ▪ <i>Petalwort</i> <i>Petalophyllum ralfsii</i> <p><i>Annex II species present as a qualifying feature, but not a primary reason for site selection</i></p> <ul style="list-style-type: none"> ▪ <i>Great crested newt</i> <i>Triturus cristatus</i> 	<p>The extensive sand dunes and intertidal areas attract large numbers of summer tourists. This impact is addressed in Sefton Metropolitan Borough Council's Beach Management Plan. Co-ordinated management of the coast is achieved through the long-standing Sefton Coast Management Scheme (now the Sefton Coast Partnership), in which all key landowners play a part. Golf course management achieves a positive balance between play areas and important habitats. Concerns have been raised regarding water abstraction on the coast. This is being addressed through detailed modelling of the dune aquifer by the Environment Agency. The coniferous plantations are also a source of debate, with a balance needed between restoration of dune habitats and public enjoyment of the woodlands.</p>	<p>Area favourable 67.2%</p> <p>Area unfavourable but recovering 21.66%</p> <p>Area unfavourable no change 7.99%</p> <p>Area unfavourable declining 3.15%</p> <p>Area destroyed / part destroyed 0%</p>
Bowland Fells SPA	N/A	<p>This site qualifies under Article 4.1 of the Directive (79/409/EEC) by supporting populations of European importance of the following species listed on Annex I of the Directive:</p> <p>During the breeding season;</p> <ul style="list-style-type: none"> ▪ Hen Harrier <i>Circus cyaneus</i> 	<p>The expansive blanket bog and heather dominated moorland provides suitable habitat for a diverse range of upland breeding birds. Favourable nature conservation status of the site depends on appropriate levels of sheep grazing, sympathetic moorland burning practice,</p>	<p>Area favourable 5.28%</p> <p>Area unfavourable but recovering 71.99%</p> <p>Area unfavourable no change 0%</p>

Site Name	Qualifying Features		Current Condition and Vulnerability ¹²	Site Condition Assessment March 2013
	Habitats	Species		
		<ul style="list-style-type: none"> ▪ Merlin <i>Falco columbarius</i> <p>This site also qualifies under Article 4.2 of the Directive (79/409/EEC) by supporting populations of European importance of the following migratory species:</p> <p>During the breeding season;</p> <ul style="list-style-type: none"> ▪ Lesser Black-backed Gull <i>Larus fuscus</i> 	<p>sensitive water catchment land management practices and on-going species protection. Since designation as an SPA, many localised problems of over-grazing have been controlled through management agreements or the Countryside Stewardship Scheme. To date approximately 20% of SPA is under Section 15 management agreements and Countryside Stewardship to stimulate heather regeneration in order to produce better moorland for grouse and raptors alike. Burning plans and stocking levels have also been agreed for all other areas of the SPA through Site Management Statements, whilst problems of raptor persecution continues to be addressed by the RSPB in conjunction with North West Water, Natural England and Lancashire Constabulary.</p>	<p>Area unfavourable declining 22.72%</p> <p>Area destroyed / part destroyed 0%</p>
Martin Mere SPA	N/A	<p>This site qualifies under Article 4.1 of the Directive (79/409/EEC) by supporting populations of European importance of the following species listed on Annex I of the Directive:</p> <p>Over winter;</p> <ul style="list-style-type: none"> ▪ Bewick's Swan <i>Cygnus columbianus bewickii</i> ▪ Whooper Swan <i>Cygnus</i> <p>This site also qualifies under Article 4.2 of the Directive (79/409/EEC) by supporting</p>	<p>Since the sites designation as a Wetland of International Importance under the Ramsar Convention and as an SPA in 1985 there has been a gradual increase in the usage of the mere by certain species of wildfowl and wading birds as a direct consequence of positive management. The refuge is vulnerable to water levels being adversely affected water abstraction for agriculture, but this is closely monitored /controlled by the Environment Agency in consultation with Natural England. Similarly the refuge is</p>	<p>Area favourable 100.0%</p> <p>Area unfavourable but recovering 0%</p> <p>Area unfavourable no change 0%</p> <p>Area unfavourable declining 0%</p> <p>Area destroyed / part destroyed 0%</p>

Site Name	Qualifying Features		Current Condition and Vulnerability ¹²	Site Condition Assessment March 2013
	Habitats	Species		
		<p>populations of European importance of the following migratory species:</p> <p>Over winter;</p> <ul style="list-style-type: none"> ▪ Pink-footed Goose <i>Anser brachyrhynchus</i> ▪ Pintail <i>Anas acuta</i> <p>Assemblage qualification: A wetland of international importance.</p> <p>The area qualifies under Article 4.2 of the Directive (79/409/EEC) by regularly supporting at least 20,000 waterfowl</p> <p>Over winter, the area regularly supports 46,196 individual waterfowl.</p>	<p>vulnerable to changes in farming practice. Grazing management is largely dependent upon cattle from surrounding farms. Water levels on the Mere are controlled to maintain optimum levels throughout the winter period, then lowered progressively in summer to expose marginal mud and the underlying damp pastures and maintain a mosaic of shallow pools. Ditches are regularly cut and dredged and all areas of pasture are positively managed under a Countryside Stewardship Scheme. Nutrients brought in with the water supply from the surrounding arable farmland and inadequate sewage treatment adds considerably to the large deposits of guano from wintering waterfowl. This results in the refuge being highly eutrophic with extremely poor water quality conditions and creates the possible risk of water borne diseases which could affect waterfowl, although no such outbreaks have been recorded. Water quality issues have started to be addressed by WWT with the creation of reedbed water filtration systems and a series of settlement lagoons helps to reduce suspended solids of effluent water arising from waterfowl areas. Regular herbicide control of trifid burr marigold is necessary in order to prevent this plant from invading lake/scape margins to the detriment of bird populations.</p>	

Site Name	Qualifying Features		Current Condition and Vulnerability ¹²	Site Condition Assessment March 2013
	Habitats	Species		
Martin Mere Ramsar Site	N/A	<p>Ramsar criterion 5 Assemblages of international importance: Species with peak counts in winter: 25,306 waterfowl</p> <p>Ramsar criterion 6 – species/populations occurring at levels of international importance.</p> <p>Qualifying Species/populations (as identified at designation): Species with peak counts in spring/autumn:</p> <ul style="list-style-type: none"> ▪ Pink-footed goose , <i>Anser brachyrhynchus</i>, <p>Species with peak counts in winter:</p> <ul style="list-style-type: none"> ▪ Tundra swan , <i>Cygnus columbianus bewickii</i>, ▪ Whooper swan , <i>Cygnus</i>, ▪ Eurasian wigeon , <i>Anas penelope</i>, ▪ Northern pintail , <i>Anas acuta</i>, 	N/A	See above.

APPENDIX B

Conservation Objectives



European Site Conservation Objectives for Ribble and Alt Estuaries Special Protection Area Site Code: UK9005103

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

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

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

This document should be read in conjunction with the accompanying *Supplementary Advice* document, which provides more detailed advice and information to enable the application and achievement of the Objectives set out above.

Qualifying Features:

- A037 *Cygnus columbianus bewickii*; Bewick's swan (Non-breeding)
- A038 *Cygnus cygnus*; Whooper swan (Non-breeding)
- A040 *Anser brachyrhynchus*; Pink-footed goose (Non-breeding)
- A048 *Tadorna tadorna*; Common shelduck (Non-breeding)
- A050 *Anas penelope*; Eurasian wigeon (Non-breeding)
- A052 *Anas crecca*; Eurasian teal (Non-breeding)
- A054 *Anas acuta*; Northern pintail (Non-breeding)
- A130 *Haematopus ostralegus*; Eurasian oystercatcher (Non-breeding)
- A137 *Charadrius hiaticula*; Ringed plover (Non-breeding)
- A140 *Pluvialis apricaria*; European golden plover (Non-breeding)
- A141 *Pluvialis squatarola*; Grey plover (Non-breeding)
- A143 *Calidris canutus*; Red knot (Non-breeding)

- A144 *Calidris alba*; Sanderling (Non-breeding)
 - A149 *Calidris alpina alpina*; Dunlin (Non-breeding)
 - A151 *Philomachus pugnax*; Ruff (Breeding)
 - A156 *Limosa limosa islandica*; Black-tailed godwit (Non-breeding)
 - A157 *Limosa lapponica*; Bar-tailed godwit (Non-breeding)
 - A162 *Tringa totanus*; Common redshank (Non-breeding)
 - A183 *Larus fuscus*; Lesser black-backed gull (Breeding)
 - A193 *Sterna hirundo*; Common tern (Breeding)
- Waterbird assemblage
Seabird assemblage

This is a European Marine Site

This SPA is a part of the Ribble and Alt Estuaries European Marine Site (EMS). These Conservation Objectives should be used in conjunction with the Regulation 35 Conservation Advice document for the EMS. For further details about this please visit the Natural England website at <http://www.naturalengland.org.uk/ourwork/marine/protectandmanage/mpa/europeansites.aspx> or contact Natural England's enquiry service at enquiries@naturalengland.org.uk or by phone on 0845 600 3078.

Explanatory Notes: European Site Conservation Objectives

These Conservation Objectives are those referred to in the Conservation of Habitats and Species Regulations 2010 (the "Habitats Regulations") and Article 6(3) of the Habitats Directive. They must be considered when a competent authority is required to make a 'Habitats Regulations Assessment' including an Appropriate Assessment, under the relevant parts of this legislation.

These Conservation Objectives and the accompanying Supplementary Advice (where available) will also provide a framework to inform the management of the European Site under the provisions of Articles 4(1) and 4(2) of the Wild Birds Directive and the prevention of deterioration or significant disturbance of its qualifying features under Article 6(2) of the Habitats Directive.

These Conservation Objectives are set for each bird feature for a [Special Protection Area \(SPA\)](#). Where the objectives are met, the site will be considered to exhibit a high degree of integrity and to be contributing to achieving the aims of the Wild Birds Directive.



European Site Conservation Objectives for Morecambe Bay Special Area of Conservation Site Code: UK0013027

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

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.

This document should be read in conjunction with the accompanying *Supplementary Advice* document, which provides more detailed advice and information to enable the application and achievement of the Objectives set out above.

Qualifying Features:

H1110. Sandbanks which are slightly covered by sea water all the time; Subtidal sandbanks

H1130. Estuaries

H1140. Mudflats and sandflats not covered by seawater at low tide; Intertidal mudflats and sandflats

H1150. Coastal lagoons*

H1160. Large shallow inlets and bays

H1170. Reefs

H1220. Perennial vegetation of stony banks; Coastal shingle vegetation outside the reach of waves

H1310. *Salicornia* and other annuals colonising mud and sand; Glasswort and other annuals colonising mud and sand

H1330. Atlantic salt meadows (*Glauco-Puccinellietalia maritimae*)

H2110. Embryonic shifting dunes

H2120. Shifting dunes along the shoreline with *Ammophila arenaria* ("white dunes"); Shifting dunes with marram
H2130. Fixed dunes with herbaceous vegetation ("grey dunes"); Dune grassland*
H2150. Atlantic decalcified fixed dunes (*Calluno-Ulicetea*); Coastal dune heathland*
H2170. Dunes with *Salix repens* ssp. *argentea* (*Salicion arenariae*); Dunes with creeping willow
H2190. Humid dune slacks
S1166. *Triturus cristatus*; Great crested newt

* denotes a priority natural habitat or species (supporting explanatory text on following page)

This is a European Marine Site

This site is a part of the Morecambe Bay European Marine Site. These conservation objectives should be used in conjunction with the Regulation 35 Conservation Advice Package, for further details please contact Natural England's enquiry service at enquiries@naturalengland.org.uk, or by phone on 0845 600 3078, or visit the Natural England website at:

<http://www.naturalengland.org.uk/ourwork/marine/protectandmanage/mpa/europeansites.aspx>

*** Priority natural habitats or species**

Some of the natural habitats and species listed in the Habitats Directive and for which SACs have been selected are considered to be particular priorities for conservation at a European scale and are subject to special provisions in the Directive and the Habitats Regulations. These priority natural habitats and species are denoted by an asterisk (*) in Annex I and II of the Directive. The term 'priority' is also used in other contexts, for example with reference to particular habitats or species that are prioritised in UK Biodiversity Action Plans. It is important to note however that these are not necessarily the priority natural habitats or species within the meaning of the Habitats Directive or the Habitats Regulations.

Explanatory Notes: European Site Conservation Objectives

These Conservation Objectives are those referred to in the Conservation of Habitats and Species Regulations 2010 (the "Habitats Regulations") and Article 6(3) of the Habitats Directive. They must be considered when a competent authority is required to make a 'Habitats Regulations Assessment', including an Appropriate Assessment, under the relevant parts of this legislation.

These Conservation Objectives and the accompanying Supplementary Advice (where available) will also provide a framework to inform the measures needed to conserve or restore the European Site and the prevention of deterioration or significant disturbance of its qualifying features as required by the provisions of Article 6(1) and 6(2) of the Directive.

These Conservation Objectives are set for each habitat or species of a [Special Area of Conservation \(SAC\)](#). Where the objectives are met, the site will be considered to exhibit a high degree of integrity and to be contributing to achieving Favourable Conservation Status for that species or habitat type at a UK level. The term 'favourable conservation status' is defined in Article 1 of the Habitats Directive.

Publication date: 30 June 2014 – version 2. This document updates and replaces an earlier version dated 29 May 2012 to reflect Natural England's Strategic Standard on European Site Conservation Objectives 2014.



European Site Conservation Objectives for Morecambe Bay Special Protection Area Site Code: UK9005081

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

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

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

This document should be read in conjunction with the accompanying *Supplementary Advice* document which provides more detailed advice and information to enable the application and achievement of the Objectives set out above.

Qualifying Features:

- A040 *Anser brachyrhynchus*; Pink-footed goose (Non-breeding)
- A048 *Tadorna tadorna*; Common shelduck (Non-breeding)
- A054 *Anas acuta*; Northern pintail (Non-breeding)
- A130 *Haematopus ostralegus*; Eurasian oystercatcher (Non-breeding)
- A137 *Charadrius hiaticula*; Ringed plover (Non-breeding)
- A141 *Pluvialis squatarola*; Grey plover (Non-breeding)
- A143 *Calidris canutus*; Red knot (Non-breeding)
- A149 *Calidris alpina alpina*; Dunlin (Non-breeding)
- A157 *Limosa lapponica*; Bar-tailed godwit (Non-breeding)
- A160 *Numenius arquata*; Eurasian curlew (Non-breeding)
- A162 *Tringa totanus*; Common redshank (Non-breeding)

A169 *Arenaria interpres*; Ruddy turnstone (Non-breeding)

A191 *Sterna sandvicensis*; Sandwich tern (Breeding)

Waterbird assemblage

Seabird assemblage

This is a European Marine Site

This SPA is a part of the Morecambe Bay European Marine Site (EMS). These Conservation Objectives should be used in conjunction with the Regulation 35 Conservation Advice document for the EMS. For further details about this please visit the Natural England website at <http://www.naturalengland.org.uk/ourwork/marine/protectandmanage/mpa/europeansites.aspx> or contact Natural England's enquiry service at enquiries@naturalengland.org.uk or by phone on 0845 600 3078.

Explanatory Notes: European Site Conservation Objectives

These Conservation Objectives are those referred to in the Conservation of Habitats and Species Regulations 2010 (the "Habitats Regulations") and Article 6(3) of the Habitats Directive. They must be considered when a competent authority is required to make a 'Habitats Regulations Assessment' including an Appropriate Assessment, under the relevant parts of this legislation.

These Conservation Objectives and the accompanying Supplementary Advice (where this is available) will also provide a framework to inform the management of the European Site under the provisions of Articles 4(1) and 4(2) of the Wild Birds Directive, and the prevention of deterioration of habitats and significant disturbance of its qualifying features required under Article 6(2) of the Habitats Directive.

These Conservation Objectives are set for each bird feature for a [Special Protection Area \(SPA\)](#). Where the objectives are met, the site will be considered to exhibit a high degree of integrity and to be contributing to achieving the aims of the Wild Birds Directive.



European Site Conservation Objectives for Bowland Fells Special Protection Area Site Code: UK9005151

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

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

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

This document should be read in conjunction with the accompanying *Supplementary Advice* document, which provides more detailed advice and information to enable the application and achievement of the Objectives set out above.

Qualifying Features:

A082 *Circus cyaneus*; Hen harrier (Breeding)

A098 *Falco columbarius*; Merlin (Breeding)

Explanatory Notes: European Site Conservation Objectives

These Conservation Objectives are those referred to in the Conservation of Habitats and Species Regulations 2010 (the "Habitats Regulations") and Article 6(3) of the Habitats Directive. They must be considered when a competent authority is required to make a 'Habitats Regulations Assessment' including an Appropriate Assessment, under the relevant parts of this legislation.

These Conservation Objectives and the accompanying Supplementary Advice (where this is available) will also provide a framework to inform the management of the European Site under the provisions of Articles 4(1) and 4(2) of the Wild Birds Directive, and the prevention of deterioration of habitats and significant disturbance of its qualifying features required under Article 6(2) of the Habitats Directive.

These Conservation Objectives are set for each bird feature for a [Special Protection Area \(SPA\)](#). Where the objectives are met, the site will be considered to exhibit a high degree of integrity and to be contributing to achieving the aims of the Wild Birds Directive.

Publication date: 30 June 2014 (Version 2). This document updates and replaces an earlier version dated 29 May 2012 to reflect Natural England's Strategic Standard on European Site Conservation Objectives 2014. Previous references to additional features identified in the 2001 UK SPA Review have also been removed.



European Site Conservation Objectives for Martin Mere Special Protection Area Site Code: UK9005111

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

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

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

This document should be read in conjunction with the accompanying *Supplementary Advice* document, which provides more detailed advice and information to enable the application and achievement of the Objectives set out above.

Qualifying Features:

A037 *Cygnus columbianus bewickii*; Bewick's swan (Non-breeding)

A038 *Cygnus cygnus*; Whooper swan (Non-breeding)

A040 *Anser brachyrhynchus*; Pink-footed goose (Non-breeding)

A052 *Anas crecca*; Eurasian teal (Non-breeding)

A054 *Anas acuta*; Northern pintail (Non-breeding)

Waterbird assemblage

Explanatory Notes: European Site Conservation Objectives

These Conservation Objectives are those referred to in the Conservation of Habitats and Species Regulations 2010 (the "Habitats Regulations") and Article 6(3) of the Habitats Directive. They must be considered when a competent authority is required to make a 'Habitats Regulations Assessment' including an Appropriate Assessment, under the relevant parts of this legislation.

These Conservation Objectives and the accompanying Supplementary Advice (where this is available) will also provide a framework to inform the management of the European Site under the provisions of Articles 4(1) and 4(2) of the Wild Birds Directive, and the prevention of deterioration of habitats and significant disturbance of its qualifying features required under Article 6(2) of the Habitats Directive.

These Conservation Objectives are set for each bird feature for a [Special Protection Area \(SPA\)](#). Where the objectives are met, the site will be considered to exhibit a high degree of integrity and to be contributing to achieving the aims of the Wild Birds Directive.

Publication date: 30 June 2014 (Version 2). This document updates and replaces an earlier version dated 29 May 2012 to reflect Natural England's Strategic Standard on European Site Conservation Objectives 2014. Previous references to additional features identified in the 2001 UK SPA Review have also been removed.



European Site Conservation Objectives for Sefton Coast Special Area of Conservation Site Code: UK0013076

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

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.

This document should be read in conjunction with the accompanying *Supplementary Advice* document, which provides more detailed advice and information to enable the application and achievement of the Objectives set out above.

Qualifying Features:

H2110. Embryonic shifting dunes

H2120. Shifting dunes along the shoreline with *Ammophila arenaria* ("white dunes"); Shifting dunes with marram

H2130. Fixed dunes with herbaceous vegetation ("grey dunes"); Dune grassland*

H2150. Atlantic decalcified fixed dunes (*Calluno-Ullicetea*); Coastal dune heathland*

H2170. Dunes with *Salix repens* ssp. *argentea* (*Salicion arenariae*); Dunes with creeping willow

H2190. Humid dune slacks

S1166. *Triturus cristatus*; Great crested newt

S1395. *Petalophyllum ralfsii*, Petalwort

* denotes a priority natural habitat or species (supporting explanatory text on following page)

APPENDIX C

Additional Bird Data

The Table below provides a review of the additional bird data for strategic and non-strategic sites where planning permission has been granted/ in-progress.

Local plan site	European Sites Potentially Affected	Bird Club records within site Y/N*	Bird Club records SPA species detail	Site potentially constitutes functionally linked land (Y/N)	Further planning information received from Fylde Council (email dated 12 th July 2016)
Strategic sites					
HSS1- Queensway, St Annes	Morecambe Bay SPA/Ramsar Ribble and Alt Estuaries SPA/Ramsar Martin Mere SPA/ Ramsar	Y	Bird records within site. SPA species recorded included: pink-footed goose, whooper swan and Bewick's swan, in large numbers.	N	Project level HRA has been undertaken for this Scheme and confirmed no likely significant effects (with mitigation in place)
HSS2- Blackfield End Farm, Church Road, Warton	Ribble and Alt Estuaries SPA/Ramsar	N	N/A	N	13/0674 outline for 360 dwellings: NE says no LSE. No HRA information was supplied. (Appeal allowed Sept 2015)
HSS3- Lytham Quays, Lytham	Ribble and Alt Estuaries SPA/Ramsar	N	N/A	N	15/0348 (third phase) NE placed holding objection, required HRA: application was withdrawn. 16/0276 (resubmission of third phase, 28 dwellings): NE objection, no HRA included, although information contained in ES. 11/0374 reserved matters for previous phase: NE objected on grounds of discharge to watercourse (into SPA) but then amended the application to avoid, NE didn't comment further
HSS4 - Coastal Dunes, , Blackpool Airport Corridor	Ribble and Alt Estuaries SPA/Ramsar	Y	Four oystercatcher records, peak count of 500 and ringed plover, 7 birds, on Pontins site.	N	<p>Potential for significant effects as a result of increased human disturbance either alone or in-combination cannot be ruled out. The HRA Screening Report for the proposed development states the following:</p> <p><i>....'Lytham Beach ranks fifth highest (out of a total of sixteen areas between the northern end of the Ribble SPA and the southern end of Liverpool Bay) for very high levels of recreational pressure. Recreational pressure from the holiday camp would have been seasonal (highest during the summer months when SPA qualifying bird species are at their lowest level), the increased public pressure from the proposed development will be year-round, dogs running loose on the beach has been identified as one of the most significant negative impacts on birds.</i></p> <p><i>Using a precautionary approach, this screening assessment has concluded that given the already very high levels of human disturbance experienced by Lytham Beach and St. Anne's Beach, adverse effects on the qualifying features of the Ribble & Alt Estuaries SPA/Ramsar cannot be ruled out as a result of the proposed development with regard to overwintering and passage waders and wildfowl...</i></p> <p>An Appropriate Assessment is therefore recommended, and NE are in agreement with this.</p>
HSS7 - Highgate Park, Lytham Road, Warton	Ribble and Alt Estuaries SPA/Ramsar	N	N/A	N	12/0550 outline (brownfield site) has HRA within ecological survey, Natural England agrees no LSE
HSS8 - The Pastures, Fleetwood Road, Wesham (built/ under construction)	Ribble and Alt Estuaries SPA/Ramsar	N	N/A	N	14/0779 approved outline: no HRA or NE concern re statutory sites, although very close to Wesham Marsh Biological Heritage Site (BHS) which has some of the same bird species. 15/0724 approved reserved matters, eastern part of site, 159 dwellings: NE says "no comments". 11/0763 (outline for western part of site): NE said "This proposal does not appear to affect any statutorily protected sites or landscapes". Ecological report says Wesham Marsh formerly used by SPA species but no longer, due to rush invasion (pages 3-4).

Local plan site	European Sites Potentially Affected	Bird Club records within site Y/N*	Bird Club records SPA species detail	Site potentially constitutes functionally linked land (Y/N)	Further planning information received from Fylde Council (email dated 12 th July 2016)
HSS9 - Land North of Blackpool Road, Kirkham	Ribble and Alt Estuaries SPA/Ramsar	Y	Black headed gull 600 (2013) Lesser black-backed gull 200 (2013) Herring gull 100 (2013)	Y	None supplied
HSS10 - Willowfields, Derby Road, Wesham	Ribble and Alt Estuaries SPA/Ramsar	N	N/A	N	Formerly part of Wesham Hospital site: 124 homes. Almost complete. 2005 reserved matters (approved 2006) on 1998 outline. No ecology info or consultations for reserved matters application; on outline info not available
MUS2 - Whyndyke Farm, Preston New Road, Whitehills	Morecambe Bay SPA/Ramsar Ribble and Alt Estuaries SPA/Ramsar Martin Mere SPA/ Ramsar	Y	One record of 3,000 pink-footed geese (from 2013), as well as other SPA records north of Mythop Road.	Y	A shadow HRA has been produced for MUS2 by the applicant which concluded no likely significant effect. On the basis of information provided, NE concurs with this view. Fylde Council have yet to produce an assessment, but it is likely that they too will conclude No Likely Significant Effect.
MUS3 - Mill Farm Sports Village, Fleetwood Road, Wesham	Ribble and Alt Estuaries SPA/Ramsar	N	N/A	N	13/0655 outline now approved: ecology only considered local effects, no HRA, no NE response.
MUS4 - Heyhouses Lane, St Annes	Ribble and Alt Estuaries SPA/Ramsar	N	No bird records within this site. SPA species recorded within 300m but separated from site by road network.	N	This site is within the built up area. Planning application documents show no impact pathways to SPA identified
Non-strategic sites in coastal locations					
HS2	Ribble and Alt Estuaries SPA/Ramsar	N	N/A	N	Conversion of existing building
HS6	Ribble and Alt Estuaries SPA/Ramsar	N	N/A	N	Demolition of 2 dwellings and erection of 14 apartments, within urban area
HS8	Ribble and Alt Estuaries SPA/Ramsar	N	N/A	N	Redevelopment of former hotel site. NE response says no LSE
HS9	Ribble and Alt Estuaries SPA/Ramsar	N	N/A	N	Demolition of hotel, erection of 32 apartments
HS21	Ribble and Alt Estuaries SPA/Ramsar	N	N/A	N	70 houses on area of car parking for airport: appeal allowed; no ecological assessment or consultees
HS23	Ribble and Alt Estuaries SPA/Ramsar	N	N/A	N	22 houses on site of former buildings/hardstand in urban area: NE says no LSE.
Non-strategic re-development, brown field sites or conversion sites					
HS3	Ribble and Alt Estuaries SPA/Ramsar	N	N/A	N	Brownfield site (former garden centre)
HS4	Ribble and Alt Estuaries SPA/Ramsar	N	N/A	N	Redevelopment of hotel site in centre of urban area
HS5	Ribble and Alt Estuaries SPA/Ramsar	N	N/A	N	Conversion of existing building
HS7	Ribble and Alt Estuaries SPA/Ramsar	N	N/A	N	Change of use from office to flats

Local plan site	European Sites Potentially Affected	Bird Club records within site Y/N*	Bird Club records SPA species detail	Site potentially constitutes functionally linked land (Y/N)	Further planning information received from Fylde Council (email dated 12 th July 2016)
HS10	Ribble and Alt Estuaries SPA/Ramsar	N	N/A	N	Demolition of traditional 3-storey building, erection of 14 apartments
HS11	Ribble and Alt Estuaries SPA/Ramsar	N	N/A	N	Conversion and extension of existing building
HS12	Ribble and Alt Estuaries SPA/Ramsar	N	N/A	N	Redevelopment of garage/retail site in urban area for 20 dwellings
HS13	Ribble and Alt Estuaries SPA/Ramsar	N	N/A	N	Redevelopment of garage in urban area for 30 extra-care apartments (not decided)
HS14	Ribble and Alt Estuaries SPA/Ramsar	N	N/A	N	Redevelopment of large purpose-built office building and erection of 45 dwellings. LCC ecology said HRA required but NE said "The proposal is unlikely to affect any statutorily protected sites or landscapes" Only ecology information supplied related to bats. Not yet permitted
HS26	Ribble and Alt Estuaries SPA/Ramsar	N	N/A	N	Redevelopment of brownfield garage site for 16 homes: no ecological information or consultees; approved
HS30	Ribble and Alt Estuaries SPA/Ramsar	N	N/A	N	Brownfield site: redevelopment of horticultural buildings and bungalow for 12 apartments, no ecology info or responses
HS31	Ribble and Alt Estuaries SPA/Ramsar	N	N/A	N	Redevelopment of former offices for 24 homes: NE response specifically on bats only
HS37	Ribble and Alt Estuaries SPA/Ramsar	N	N/A	N	Subdivision of existing house and 11 homes to rear on site of former horticultural buildings in centre of Freckleton: no SPA species, no consultation responses
HS56	Ribble and Alt Estuaries SPA/Ramsar	N	N/A	N	Ecology report says no SPA birds found in survey
Non-strategic small pastoral/greenfield and caravan sites					
HS15	Ribble and Alt Estuaries SPA/Ramsar	N	N/A	N	Greenfield site for 12 homes. Ecology report concludes not functionally-linked land, but area to west of development site probably is. No NE response. Under construction.
HS22	Ribble and Alt Estuaries SPA/Ramsar	N	N/A	N	Open land part of former garage site for 14 homes. Current reserved matters 15/0891 ecology report makes no ref to European sites, no HRA info, and no record of SPA birds on site. Previous ecology report for outline 11/0847 similar. No consultee responses
HS24	Ribble and Alt Estuaries SPA/Ramsar	N	N/A	N	83 dwellings mostly greenfield: NE said unlikely there would be significant effects but in same consultation required a HRA to be produced, but then said no objection. Approved
HS25	Ribble and Alt Estuaries SPA/Ramsar	N	N/A	N	Part greenfield, part brownfield redevelopment of glasshouses (almost complete) 0/0766 outline ecology concerned mainly with great crested newts, no NE response; 11/0816 reserved matters: NE said "This proposal does not appear to affect any statutorily protected sites or landscapes, or have significant impacts on the conservation of soils, nor is the proposal EIA development
HS27	Ribble and Alt Estuaries SPA/Ramsar	N	N/A	N	NE response says no likely significant effect (ecological survey did not include HRA)
HS28	Ribble and Alt Estuaries SPA/Ramsar	N	N/A	N	No information

Local plan site	European Sites Potentially Affected	Bird Club records within site Y/N*	Bird Club records SPA species detail	Site potentially constitutes functionally linked land (Y/N)	Further planning information received from Fylde Council (email dated 12 th July 2016)
HS32	Ribble and Alt Estuaries SPA/Ramsar	N	N/A	N	12/0376 (minded to approve subject to s106) only great crested newt mitigation included, no HRA information, no NE response
HS38	Ribble and Alt Estuaries SPA/Ramsar	N	N/A	N	No information
HS39	Ribble and Alt Estuaries SPA/Ramsar	N	N/A	N	42 dwellings, greenfield site: NE says "the proposal is unlikely to affect any statutorily protected sites or landscapes"
HS40	Ribble and Alt Estuaries SPA/Ramsar	N	N/A	N	Greenfield. Includes some land used by Pink Footed Geese includes HRA – LCC ecology says no significant effects; some Pink Footed Geese data included in application
HS41	Ribble and Alt Estuaries SPA/Ramsar	N	N/A	N	None supplied
HS44	Ribble and Alt Estuaries SPA/Ramsar	N	N/A	N	Greenfield site: 12/0408 outline ecological survey includes no HRA info or SPA species, LCC ecology response similar; 13/0097 reserved matters reiterates
HS45	Ribble and Alt Estuaries SPA/Ramsar	N	N/A	N	Greenfield site with some horticultural buildings, for 25 homes; no HRA info provided or required in consultee response
HS46	Ribble and Alt Estuaries SPA/Ramsar	N	N/A	N	Mostly greenfield site with a few buildings. Ecological survey: no SPA species, no HRA, not raised in LCC ecology response
HS47	Ribble and Alt Estuaries SPA/Ramsar	N	N/A	N	Greenfield site. No HRA info, no consultee response
HS49	Ribble and Alt Estuaries SPA/Ramsar	N	N/A	N	15/0763 HRA supplied following NE request; no further response yet
HS50	Ribble and Alt Estuaries SPA/Ramsar	N	N/A	N	30 homes on greenfield site. 15/0165 NE and GM ecology unit say no LSE. No HRA info in ecological survey
Non-strategic sites that have been completed or where applications have been withdrawn					
HS1					<i>Approved in 2005 complete</i>
HS54					<i>Mostly complete. Greenfield site in grounds of village hall. No HRA info in ecological survey or consultee responses</i>
HS55					<i>Mostly complete; ecology report concluded no potential effects on designated sites</i>
HS29					<i>Complete; no ecology information submitted (application was from 2005 approved in 2006)</i>
HS53					<i>Withdrawn</i>
HS16, HS17, HS18, HS19, HS20, HS33, HS34, HS35, HS36, HS42, HS43, HS48					<i>Complete</i>

**specified records are those provided with a 6 figure OS grid reference and therefore provide more accurate location information than records that are only related to a 2km tetrad*

The Table below provides a rapid review of additional bird data for strategic and non-strategic sites with no planning permission (allocations)

Local Plan Site	European Sites Potentially Affected	Fylde Bird Club Records					Pink-footed goose index data square? (Y/N)	Further planning information received from Fylde Council (email correspondence July 2016)	Allocation considered to be Functionally Linked / adjacent to Functionally Linked land?
		Records within site Y/N*	SPA species records within 300m Y/N	Detail of records within 300m Species number (year of record)	Next nearest SPA species record	Detail of nearest record			
Strategic Locations for Development :									
The policies listed below identify the site-specific detail of where development is to be located within Fylde.									
MUS1 - Cropper Road East, Whitehills	Morecambe Bay SPA/Ramsar	N	Y	Pink-footed geese 1500 (2013) Pink-footed geese 3000 (2013)	Tetrad data Sandham's way to the north	Lots of lesser black backed gull , herring gull and black headed gull records	N	Queensway & M55 link road swan and goose monitoring, winter 2014/2015 ¹³ - Shows wintering waterfowl distributed to the south east of the proposed development Current outline application 15/0114 has no HRA info, no NE response. Approved outline 12/0717 (western part of site) ecological assessment includes no HRA info, no NE or ecology response. 13/0753 Moss Farm site (small): no HRA info in ecology assessment, no NE response. 15/0472 no ecology/HRA at all but area covered by 12/0717.	Although pink-footed geese were recorded nearby. Records are from south of the site, beyond a road and therefore land where the development is proposed or in close proximity is considered not to be functionally linked.
	Ribble and Alt Estuaries SPA/Ramsar Martin Mere SPA/ Ramsar				Tetrad data Sandham's way to the north	Records of single oystercatchers			
HSS5 - Cropper Road West, Whitehills	Morecambe Bay SPA/Ramsar Ribble and Alt Estuaries SPA/Ramsar Martin Mere SPA/ Ramsar	N	Y	Pink-footed geese 1500 (2013) Pink-footed geese 3000 (2013)	Tetrad data	Black-headed gull 160 (2014) (Sandhams Way) Black-headed gull 140 (2014) (Sandhams Way)	N	Queensway & M55 link road swan and goose monitoring, winter 2014/2015 - Shows wintering waterfowl distributed to the south east of the proposed development	Although pink footed geese were recorded nearby, records are from south of the site, beyond a road. Additionally the gulls that were observed are equally likely to be located on larger fields similar to the habitat pink-footed geese were associated with. Therefore, it is concluded that the site does not constitute functionally linked land.
HSS6 - Land at Lytham St Annes Way, Whitehills	Ribble and Alt Estuaries SPA/Ramsar	N	N	N/A	Tetrad data	Pink-footed goose 200 (2010) Pink footed goose 500 (2012) Mereside Black headed gull 160 (2014) Mereside Black headed gull 140 (2014) Mereside	N	Queensway & M55 link road swan and goose monitoring, winter 2014/2015 ¹³ - Shows wintering waterfowl distributed to the south east of the proposed development Also new application 15/0686: housing is on land outside HSS6 on plan, but pond for mitigation is within the strategic site. Not yet determined (only 14 dwellings). No HRA for any of the original applications. Application 10/0752 (relocated ponds) – no mention of HRA by county ecology, no apparent comment from NE. 10/0751 (only 10 dwellings): no ecology submission or consultation at all. 10/0900 (64 dwellings) county ecology doesn't mention European sites, no NE response.	Although pink-footed geese were recorded nearby, records are likely to be from south of the site, beyond a road. Additionally the gulls that were observed are equally likely to be located on larger fields similar to the habitat pink footed geese were associated with. Therefore, it is concluded that the site does not constitute functionally linked land.
HS28- Sunnybank Mill, Kirkham	Ribble and Alt Estuaries SPA/Ramsar	N	Y	Curlew 3 (2013) Herring gull 1 (2014)	Tetrad 43B	No relevant records	N	No further information supplied	As this existing building is surrounded on three sides by buildings, species associated with European sites are unlikely to be present within this area. Therefore this site is not considered to

¹³ TEP (2015) Queensway & M55 link road swan and goose monitoring, winter 2014/2015 Report Ref:4783.005

Local Plan Site	European Sites Potentially Affected	Fylde Bird Club Records					Pink-footed goose index data square? (Y/N)	Further planning information received from Fylde Council (email correspondence July 2016)	Allocation considered to be Functionally Linked / adjacent to Functionally Linked land?
		Records within site Y/N*	SPA species records within 300m Y/N	Detail of records within 300m Species number (year of record)	Next nearest SPA species record	Detail of nearest record			
									constitute functionally linked land for species associated with European sites.
HSS9- Part of Kirkham Triangle,	Ribble and Alt Estuaries SPA/Ramsar	N	Y and 43 B tetrad	Black-headed gull 600 (2013) Lesser black-backed gull 200 (2013) Herring gull 100 (2013) Pink-footed goose 60 (2012)	929m	Lesser black backed gull 200 (2014)	N	12/0419 and 12/0635 Appeals allowed (recovered joint appeal): ecology was a factor, but only related to protected species: no HRA issue arose. No NE comments. 15/0177 NE response says no LSE. Ecological survey contains no HRA data	Gulls were observed within ploughed fields directly to the south of the site. A single pink-footed goose flock was recorded in Kirkham, all others were recorded in Wesham (north of the site over a railway line). Gull species have less specific habitat requirements than other species associated with European sites (such as waterfowl), therefore the site is not considered to constitute functionally linked land.
Employment sites									
ES1 - Queensway Industrial Estate, Snowden Road, St Annes	Morecambe Bay SPA/Ramsar Ribble and Alt Estuaries SPA/Ramsar Martin Mere SPA/ Ramsar	N	Y	Whooper swan 125 (2011)	795m	Whooper swan 16 (2014)	N	Queensway & M55 link road ecological assessment included swan and goose monitoring, winter 2014/2015 ¹³ – The results show wintering waterfowl are distributed to the south east of the ES1 site	Wintering waterfowl are present within the immediate vicinity of this site, however, according to the Queensway study, higher concentrations of waterfowl, such as pink-footed goose, whooper and Bewick's swan were recorded to the south east of the development. Suggesting that the site is considered to not constitute functionally linked land.
ES2 - Dock Road, Lytham	Ribble and Alt Estuaries SPA/Ramsar	N	N	N/A	Tetrad data (Lytham dock data)	Lapwing 12 (2010) Teal 50 (2010) Shelduck 4 (2010) Teal 6 (2010) Curlew 50 (2010)	Medium goose index area	No further information supplied	This site is currently in use as a scrap yard, and therefore would not be functionally linked land.
					396m	Bewick's swan 8 (2011)			
					408m	Whooper swan 16 (2014)			
ES3 - Boundary Road, Lytham	Morecambe Bay SPA/Ramsar Ribble and Alt Estuaries SPA/Ramsar Martin Mere SPA/ Ramsar	N	Y	Whooper swan 2 (2010)	447m	Curlew 50 (2014)	Medium goose index area	No further information supplied	This site is surrounded on the east side by Boundary Road, to the south by Preston Road and to the north and some of the west by buildings. This suggests that this already is a disturbed area of land and therefore is likely to be suitable for species designated as part of European sites. Therefore, functionally linked land is not associated with the site.
ES4 - Blackpool & Fylde Industrial Estate, Whitehills	Morecambe Bay SPA/Ramsar Ribble and Alt Estuaries SPA/Ramsar Martin Mere SPA/ Ramsar	N	N	N/A	776m	Lapwing 2 2011	N	Queensway & M55 link road ecological assessment included swan and goose monitoring, winter 2014/2015 ¹³ – The results show wintering waterfowl are distributed to the south east of the ES1 site	The pink footed goose record was to the north east, beyond a roundabout for the M55, therefore not linked to the site. The lapwing record was also from a similar location. The gull and oystercatcher records, were located to the north in an industrial estate area. This habitat is likely to be disturbed and therefore it is unlikely that if these species would be excluded from the site if development was undertaken.
					904m	Pink footed goose 320 (2012) (Whyndyke Farm)			
					Tetrad data Sandham's way to the north	Lots of lesser black backed gull , herring gull and black headed gull records			
					Tetrad data Sandham's way to the north	Records of single oystercatchers			

Local Plan Site	European Sites Potentially Affected	Fylde Bird Club Records					Pink-footed goose index data square? (Y/N)	Further planning information received from Fylde Council (email correspondence July 2016)	Allocation considered to be Functionally Linked / adjacent to Functionally Linked land?
		Records within site Y/N*	SPA species records within 300m Y/N	Detail of records within 300m Species number (year of record)	Next nearest SPA species record	Detail of nearest record			
ES5 - Blackpool Airport, Squires Gate Lane, Blackpool Airport Corridor	Ribble and Alt Estuaries SPA/Ramsar	N	N		1286m	Common tern 11 (2013)	N	No further information supplied	This site is surrounded on two sides by airport and roads, with buildings on the other sides. Therefore this locality is likely to be highly disturbed and unsuitable for species designated as part of European sites. Therefore there is not likely to be functionally linked land.
					Tetrad data 33A	Lesser black-backed gull 26 2013 (nesting)			
						Herring gull 15 2013(nesting)			
ES6 - ITSA, Brunel Way, Whitehills	Ribble and Alt Estuaries SPA/Ramsar	N	Tetrad 33L Sandham's way to the north	Records of lesser black backed gull , herring gull and black headed gull records	486m	2 lapwing (2011)	Near to a high pink footed goose index square	No further information supplied	The lapwing record was to the north east, beyond a roundabout for the M55, therefore not linked to the site. The gull and oystercatcher records, were located to the north in an industrial estate area. This habitat is likely to be disturbed currently and therefore it is unlikely that if these species would be excluded from the site if development was undertaken. Therefore, not likely to be functionally linked land.
			Tetrad 33L Sandham's way to the north	Records of single oystercatchers					
ES7 - Whitehills Business Park, Whitehills	Morecambe Bay SPA/Ramsar Ribble and Alt Estuaries SPA/Ramsar Martin Mere SPA/ Ramsar		Y33L Tetrad	Several lesser black backed gull , herring gull and black headed gull records Pink footed goose records for 'Peel' location likely to be either south or east of the site Whooper swan records for 'Peel' location likely to be either south or east of the site	661m	Pink-footed goose 320 (2012)	Near to a high pink footed goose index square	Queensway & M55 link road ecological assessment included swan and goose monitoring, winter 2014/2015 ¹³ – The results show wintering waterfowl are distributed to the south east of the ES1 site	Records of gull species to the north within areas already industrialised and therefore subject to high levels of disturbance.
			Y 237	Lapwing 2 (2011)					
ES8- Naze Lane, Freckleton	Ribble and Alt Estuaries SPA/Ramsar	N	N	N/A	Tetrad data	Large number of wader species associated with Freckleton Naze (whooper swan, Bewick's swan, pink-footed goose, shelduck, wigeon, teal, mallard, cormorant, oystercatcher, golden plover, lapwing, curlew, dunlin, redshank, black-headed gull, herring gull, lesser black- backed gull, pintail, ruff, ringed plover, bar-tailed godwit, whimbrel, Arctic tern, eider, sandwich tern, turnstone, knot, little tern and grey plover).	N	No further information supplied	Due to the large number of species present within the location of the site, it is considered that land in the vicinity of the site is functionally linked.

Local Plan Site	European Sites Potentially Affected	Fylde Bird Club Records					Pink-footed goose index data square? (Y/N)	Further planning information received from Fylde Council (email correspondence July 2016)	Allocation considered to be Functionally Linked / adjacent to Functionally Linked land?
		Records within site Y/N*	SPA species records within 300m Y/N	Detail of records within 300m Species number (year of record)	Next nearest SPA species record	Detail of nearest record			
Non-strategic sites									
HS38- Land rear of High Meadows, Lower Lane, Freckleton,	Ribble and Alt Estuaries SPA/Ramsar	N	N	N/A	Tetrad data	Black-headed gull 201 (2010)	N	No further information supplied	This location had minimal bird records and the site is surrounded on two sides by housing and one side by a road and housing. The land is not considered to be functionally linked land.
HS41, Thornfield Caravan Park, Staining,	Ribble and Alt Estuaries SPA/Ramsar	N	N	N/A	Tetrad data	Pink-footed Goose 2,500 (2011)	N/A –not within goose map area	No further information supplied	This site is surrounded by housing on all sides and is therefore likely to provide poor habitat for bird species. The land is not considered to be functionally linked land.
HS51- Newton Hall, School Lane, Newton,	Ribble and Alt Estuaries SPA/Ramsar	N	Y 43K tetrad	Curlew 85 (2010), shelduck 52 (2010), teal 40 (2014), pink-footed goose 310 (2014)	541m	Whooper swan 15 (2013)	N/A –not within goose map area	No further information supplied	The records from the tetrad are likely to be from fields south of the development location, as the site is in between two roads and situated immediately adjacent to the residential area of Newton. Therefore the habitat is suboptimal for birds associated with European sites. Therefore this location is likely to not be functionally linked land.
HS52- Cobweb Barn, Oak Lane , Newton,	Ribble and Alt Estuaries SPA/Ramsar	N	N	N/A	376 43K tetrad	Curlew 85 (2010), shelduck 52 (2010), teal 40 (2014), pink-footed goose 310 (2014)	N/A –not within goose map area	No further information supplied	The records from the tetrad are likely to be from fields south or west of the development location, as the site is in between a road and situated immediately adjacent to the residential area of Newton. Therefore the habitat is suboptimal for birds associated with European sites and does not constitute functionally linked land.
Elswick non-strategic location for development	Ribble and Alt Estuaries SPA/Ramsar	N	N	N/A	950 43J tetrad	Lesser black-backed gull 60 (2013), curlew 14 (2014)	N/A –not within goose map area	Application 16/0180 'Natural England has no comment on this application'	This allocation will be on the edge of the village, birds designated within European sites are unlikely to be present in this location and the village is outside of NE's IRZ for pink-footed geese. There will be a loss of greenfield land; however, Elswick is surrounded by open countryside and birds will be able to use less disturbed areas.

APPENDIX D

Natural England Consultation Response

Date: 01 April 2016
Reference:



Julie Glaister
Fylde Council
Town Hall
Lytham St. Annes
Lancashire
FY8 1LW
julieg@fylde.gov.uk

BY EMAIL ONLY

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Julie

Fylde Local Plan to 2032: Revised Preferred Option

Thank you for your email dated 1 March 2016 on the above.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Thank you for your recent letter regarding **Fylde Local Plan to 2032: Revised Preferred Option**. As requested I am writing to summarise our advice regarding the Fylde Preferred Options consultation, specifically in relation to functionally linked.

Having reviewed the HRA, we note the series of recommendations in Table 10 that the wording of certain policies should be strengthened to avoid potential impacts from future development on functionally linked land. This includes reference to the need for project level assessment at the development management stage. We would like to see the revised wording before commenting further. As the Local Plan is to run to 2032 there is a need to future proof the plan, as additional allocations will come forward during this plan period, which may have reoccurring issues regarding functionally linked land.

We also note that the HRA concludes no likely significant effect (LSE) from any of the strategic and non-strategic allocations. For LSE to be ruled out at the Plan stage, you will need to be certain that this is the case. We advise that there is currently not enough information to conclude no LSE on all the site allocations and further assessment is required.

To validate the screening process and make it more robust we advise you use the following additional sources of information to further improve your screening assessment:

- WeBS records;
- Natural England's Impact Risk Zones (which now includes a new IRZ for pink footed geese);
- Local bird/ ornithological groups/clubs records to assist in the screening in/out of allocations
- Local Record Centres

- Relevant survey information from current and recent planning applications
- Morecambe Bay Wader Roost Study (acknowledging that this is primarily for Morecambe Bay but provides context and reference to the Ribble)

Where no LSE can be concluded, those sites can go forward. Where it cannot be concluded that there is no LSE, those sites will require Appropriate Assessment. However, we recognise that the Local Plan is behind and planning applications continue to come forward. We are also aware that many of the allocations have existing planning permission and that the remaining sites are relatively few. With this in mind, we would support a proportionate approach whereby the level of Appropriate Assessment is sufficient to determine the scale of impacts and an appropriate scale of mitigation.

Where Appropriate Assessment identifies potential adverse effects, the Plan should be clear where there are potential constraints and that further assessment will be needed at the project stage.

Strategic mitigation will need to be built in to the Plan to deal with effects arising from proposed allocations as well as any future development. The scope of the mitigation needs to be presented in the Plan along with an identified mechanism to deliver it. There should also be clear evidence that all alternative sites for the allocations have been explored. In assessing avoidance and mitigation there may be opportunities for cross-boundary solutions with neighbouring authorities.

Natural England would be happy to meet to clarify any points or to discuss further.

For any queries relating to the specific advice in this letter only please contact Kate Wheeler on 07769 918711. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely

Kate Wheeler
Cheshire, Greater Manchester, Merseyside and Lancashire Area

Date: 05 January 2016
Ref: 168770



planningpolicy@fylde.gov.uk

BY EMAIL ONLY

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Fiona

Fylde Local Plan to 2032: Revised Preferred Option Consultation

Thank you for your consultation received on 14th October 2015.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Neighbourhood Plans

The plan states (1.7) that some Neighbourhood Development Plans are being prepared in advance of the Local Plan. Given this is the case it would be helpful to include the following text in the Local Plan:

Where a Neighbourhood Plan could lead to significant environmental effects it will be necessary to screen the Plan in relation to the Habitats & Species Regulations (as amended) 2010 (the 'Habitats Regulations') and the Environment Assessment of Plans and Programmes Regulations 2004.

In relation to the Habitats Regulations, a Neighbourhood Plan cannot progress if it would result in a likely significant effect on any European Site (see Schedule 2, The Neighbourhood Planning (General) Regulations 2012). Therefore reduction and/or avoidance measures may need to be incorporated into the Neighbourhood Plan to ensure compliance with the Regulations. A screening exercise should be undertaken if there is any doubt about the effects of the Plan on European protected sites. **This will be particularly important if a Neighbourhood Plan is to progress before a Local Plan has been adopted and/or the Neighbourhood Plan proposes development which has not be assessed and/or included in the HRA for the Local Plan.**

In addition to the HRA process, if environmental effects are predicted a SEA screening exercise should also be undertaken. A SEA may be required where:

- a neighbourhood plan allocates sites for development
- a neighbourhood plan contains sensitive natural assets that may be affected by the plan
- a neighbourhood plan may have significant effects that have not already been considered and dealt with in the Sustainability Appraisal for the Local Plan.

Infrastructure

There appears to be a degree of uncertainty from Natural England's perspective in terms of the capacity of existing and proposed infrastructure to meet the demand of future housing. Any uncertainty should be explored to ensure the Plan is compliant with Regulation 102 of the Conservation of Habitats and Species Regulations 2010. Natural England advises that the Local Plan process provides an opportunity to explore strategic infrastructure requirements with the aim of limiting environmental issues at the project stage. Therefore, if further detail on expected infrastructure can be provided at this stage it would help to provide certainty that housing can be

delivered during the plan period.

It may be that Fylde can confirm that further discussion has taken place between the Council and United Utilities with respect to proposed growth and required infrastructure, taking into account of recent Water Cycle Studies and the Infrastructure Delivery Plan. It would be useful to explain what mechanisms are in place to allow the necessary infrastructure to be provided to facilitate growth and how this is transferred to the Asset Management Plans of the water companies. It is also important that this issue is addressed in the revised HRA. Some examples where there are uncertainties are as follows:

6.18 states ... the Fylde-Blackpool Periphery has some wastewater infrastructure issues (meaning development will need to be phased with wastewater infrastructure being delivered prior to development commencing...

7.2 It is important that the strategic development sites are accompanied by the timely provision of infrastructure, otherwise proposals will not be deliverable...

7.24 Foul and surface water runs into the same combined sewer and this can result in flooding problems and detrimental effects on bathing water quality along the Fylde Coast, especially during periods of heavy rainfall and storm surges. A number of watercourses in the area discharge to the combined sewage system. There is some limited capacity in the combined sewer system. However, additional loading of the system caused by further development could impact upon overflow spills into the Ribble Estuary and exacerbate effects on bathing water quality, notifiable features and tourism. Therefore, discharges to the combined sewer system will only be permitted as a last resort.

7.25 Infrastructure capacity for wastewater and water supply is limited for Queensway, St Annes (site HSS1). ...

The Infrastructure Delivery Plan states under:

Water Supply – the next steps

3.48 The council will continue to engage with UU as the Local Plan develops, particularly to decide whether detailed modelling is required to understand more fully the infrastructure that is required to support the proposed level of growth identified in the Local Plan. Natural England maintains this needs to be addressed at this stage to ensure deliverability of the plan.

Water infrastructure capacity and supply impacts could have an impact on the deliverability of some allocations, which is therefore a soundness issue under the effectiveness test. It is critical to detail the provision that must be in place at this stage. However what is lacking is any detail on existing infrastructure and capacity and what future infrastructure is planned other than reference to possible detailed modelling. There must be viable options available in order to meet wastewater drainage demands otherwise there is concern that some sites will not be delivered, resulting in an unsound plan. This detail must be in the HRA at this stage. Natural England therefore advises the following:

The HRA needs to identify the quantum of development within each wastewater treatment works catchment. The HRA at this stage must demonstrate that options are available to ensure wastewater from planned new development can be treated without adverse impact upon European sites. Natural England advises that further detail should be provided to explain how impacts should be avoided and/or mitigated for. This will give a higher level of confidence that the areas in question can be developed without resulting in adverse effects on European sites and are therefore deliverable.

Policy CL3 Renewable and Low Carbon Energy generation

Given the nature of solar development (reduction in land available for SPA birds), and other developments that reduce the amount of available land to SPA birds, it is important that the LPA and their developers understand that the cumulative and in combination effects cut across boundaries and that the HRA's need to take into account this scenario. Developers must be

required to fully assess the loss of Functionally Linked Land across the boundary specifically in relation to PFG (but not restricted to). PFG as you know are very mobile species and therefore whilst a loss in the LPA boundary of Fylde may not be significant, land losses elsewhere will eventually put a strain on the available resources for SPA birds and the in combination of developments in Fylde could trigger LSE. The policy mentions mitigation, which is welcomed but where LSE is triggered in most cases the mitigation needs to be in place prior to development. It is recommended that this policy needs to be re-worded to reflect this.

It is suggested that the LPA may consider the opportunities for developers to come together and consider a more holistic approach for mitigation (areas).

HRA

Natural England advises that further detail should be provided to explain how should impacts can be avoided and/or mitigated for at this stage; the plan is not at an early stage as indicated. This will give a higher level of confidence that the areas in question can be redeveloped without resulting in adverse effects on European sites and are therefore deliverable. Whilst Natural England appreciates that the full details of all schemes may not be yet fully known, it would still be beneficial to explore how the predicted effects can be resolved at project stage to provide further certainty that projects will be deliverable at the planning application stage.

Further detail on the measures that will be taken to avoid potential impacts as result of the Strategic Locations for Development. The HRA outlines that re-wording of the Policy will be required, however no further detail is provided in the policies in terms of the proposed re-wording.

The HRA needs to be able to confidently conclude no LSE, not just that potential effects could be resolved through the recommended changes. As much detail needs to be considered as possible at this stage in the plan to ensure the deliverability at project level.

The overall conclusion reached in the HRA is *It has therefore been concluded that, assuming appropriate mitigation and compensation measures are implemented at the project level, the Fylde Local Plan is unlikely to have any significant effects on the European sites identified, either alone or in-combination with other plans or projects.* Natural England maintains that the conclusions need to be based on a robust detailed assessment.

Before Natural England can agree with the conclusions reached, we would like to see more evidence and explanation to support the view that additional policy wording/strengthening outlined are robust enough to ensure that the preferred options are “unlikely to have any significant effects on the European Sites identified, either alone or in combination with any other plans and projects”.

Once more details are known it is likely that changes will occur between the current draft and the next stage prior to submission; the plan should be rescreened with respect to The Conservation of Habitats and Species Regulations 2010. Natural England should be consulted on any amendments that may lead to a likely significant effect(s) on any European Site.

It is essential that our comments are addressed as soon as possible to ensure that the HRA is compliant with the requirements of The Conservation of Habitats and Species Regulations 2010.

Sustainability Appraisal (SA)

Natural England agrees with the conclusions reached in the SA. The SA clearly outlines both negative and uncertain impacts. We note there are some unresolved uncertainties in the SA. These negative and uncertain effects should be explored further in the next iteration of the SA as avoidance and/or mitigation measures may be required in order to reduce harm to the environment. As more information becomes available the findings should become more refined.

SPD

Natural England welcomes the commitment to produce an SPD. The SPD must also be able to demonstrate deliverability of the strategic solutions relating to designated sites, including Pink Footed Goose (PFG) mitigation to ensure a sound framework in which to guide planning applications. Therefore the SPD must be able to clearly set out how strategic solutions for PFG

mitigation will be delivered. It would be helpful to add some text to the plan outlining the purpose of the SPD.

For any queries relating to the specific advice in this letter only please contact Kate Wheeler on 07769 918711. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely

Kate Wheeler
Cheshire, Greater Manchester, Merseyside and Lancashire Area



Arcadis Consulting (UK) Limited

The Mill
Brimscombe Port
Stroud
GL5 2QG
United Kingdom
T: +44 (0)1453 423 100

[arcadis.com](https://www.arcadis.com)

