



Habitats Regulations Assessment of the Exeter Plan: Publication Draft (Regulation 19)

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Summary

The Conservation of Habitats and Species Regulations 2017 (as amended) require local authorities to assess the impact of their local plan on the internationally important sites for biodiversity in and around their administrative areas. Together, these Special Protection Areas, Special Areas of Conservation and Ramsar sites are known as European sites. The task is achieved by means of a Habitats Regulations Assessment (HRA).

An HRA asks very specific questions of a plan. Firstly, it ‘screens’ the plan to identify if there is a risk that certain policies or allocations may have a ‘likely significant effect’ on a European site, alone or (if necessary) in-combination with other plans and projects. If the risk of likely significant effects can be ruled out, then the plan may be adopted but if they cannot, the plan must be subjected to the greater scrutiny of an ‘appropriate assessment’ to find out if the plan will have an ‘adverse effect on the integrity’ of the European sites.

Following an appropriate assessment, a Plan may only be adopted if an adverse effect on the integrity of the site can be ruled out. If necessary, a plan should be amended to avoid or mitigate any likely conflicts. This usually means that some policies or allocations will need to be modified or, more unusually, may have to be removed altogether.

This document is an HRA report to accompany the Exeter Plan at the Publication Draft Plan (Regulation 19) stage, in December 2024.

Likely significant effects were identified with respect to the following pathways and European sites:

- General Urban Effects: Exe Estuary SPA/Ramsar;
- Recreation: Exe Estuary SPA/Ramsar, East Devon Heaths SAC/SPA, Dawlish Warren SAC;
- Hydrological Effects: Exe Estuary SPA/Ramsar.

Following appropriate assessment, adverse effects on integrity for all European sites can be ruled out, alone or in-combination. As the Plan-making process proceeds, there will be further consultations and examination. The Plan may well be subject to modification prior to adoption and any changes to the Plan should be accompanied by additional HRA work and updates to the HRA. The HRA will be finalised at the point at which the plan is adopted.

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1. Introduction

Overview

- 1.1 This document is a Habitats Regulations Assessment (HRA) report to accompany the Exeter Plan ('the Plan') at the Publication Draft Plan (Regulation 19) stage. This report has been prepared by Footprint Ecology on behalf of Exeter City Council. An HRA assesses the implications of a plan for legally protected European sites. The HRA will be finalised at the point at which the Plan is ready for adoption.

The Exeter Plan

- 1.2 Exeter City covers an area just under 4,800ha and is the capital of Devon. It is home to around 130,000 people and lies at the head of the Exe Estuary, around 10km from the open coast.
- 1.3 The Exeter Plan will be the main planning policy document for Exeter and will set out where development should take place and provide the policies which will be used in making decisions on planning applications. It will eventually replace the policies in the Core Strategy and the Local Plan First Review.
- 1.4 Work on the Exeter Plan commenced in 2020. The Publication Draft Plan (Regulation 19) builds on the Outline Draft Plan (2022) and the Full Draft Plan (2023). The Publication Draft provides a full set of proposed planning policies and more detailed information on brownfield development sites. This version of the Plan will be subject to a formal representation period prior to being submitted to the Planning Inspectorate for examination. All previous stages have been accompanied by an HRA report, which has been updated and refined as the Plan has progressed. Natural England have provided comment and advice in representations to earlier iterations and the HRA has been adapted accordingly.

Habitats Regulations Assessment process

- 1.5 The designation, protection and restoration of European wildlife sites is embedded in the Conservation of Habitats and Species Regulations 2017, as amended, which are commonly referred to as the 'Habitats Regulations'. These are domestic law and remain in place post-Brexit. The most recent amendments (the Conservation

of Habitats and Species (amendment) (EU Exit) Regulations 2019¹) take account of the UK's departure from the EU.

- 1.6 Regulation 105 *et seq* addresses the assessment of local plans and determines the scope of this HRA alongside recent Government Guidance on the interpretation and application of the Regulations².

European sites

- 1.7 'European sites' are those over which the provisions of the Habitats Regulations exert an influence, through statute or policy. They are the top tier of protected sites in the UK and are of international importance for nature conservation. Prior to Brexit, these were part of the Natura 2000 network of sites which formed the largest global network of protected sites.
- 1.8 Sites that are afforded statutory protection and included within regulation 8 of the Habitats Regulations are now part of the 'national network' and referred to as Habitats sites. Statutory sites comprise of the following:
- Special Areas of Conservation (SACs) designated under the 1992 Habitats Directive;
 - Sites of Community Importance (SCI) included on the list of such sites compiled by the European Commission and submitted before the UK left the EU;
 - Candidate SACs (cSACs), submitted by the UK government to the European Commission before Exit day as eligible for selection as an SCI;
 - Special Protection Areas (SPAs) classified under the 1979 Birds Directive;
 - Potential SPAs (pSPAs) include potential sites as designated by the European Commission under the Conservation of Wild Birds Directive (2009).
 - Areas providing formal compensation for damage to a European site.

¹ The amending regulations generally seek to retain the requirements of the 2017 Regulations but with adjustments for the UK's exit from the European Union. See Regulation 4, which also confirms that the interpretation of these Regulations as they had effect, or any guidance as it applied, before exit day, shall continue to do so.

² Habitats regulations assessments: protecting a European site. Defra and Natural England. 24 February 2021. <https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site>

- 1.9 According to long-established Government policy³, European sites also comprise 'Wetlands of International Importance' (or Ramsar sites) although these do not form part of the national network.
- 1.10 The overarching objectives of the national network are to maintain, or where appropriate, restore habitats and species listed in Annexes I and II of the Habitats Directive to a Favourable Conservation Status. They also contribute to ensuring, in their area of distribution, the survival and reproduction of wild birds and securing compliance with the overarching aims of the Wild Birds Directive.
- 1.11 The appropriate authorities must have regard to the importance of protected sites, coherence of the national site network and threats of degradation or destruction (including deterioration and disturbance of protected features) on SPAs and SACs.

Role of the competent authority

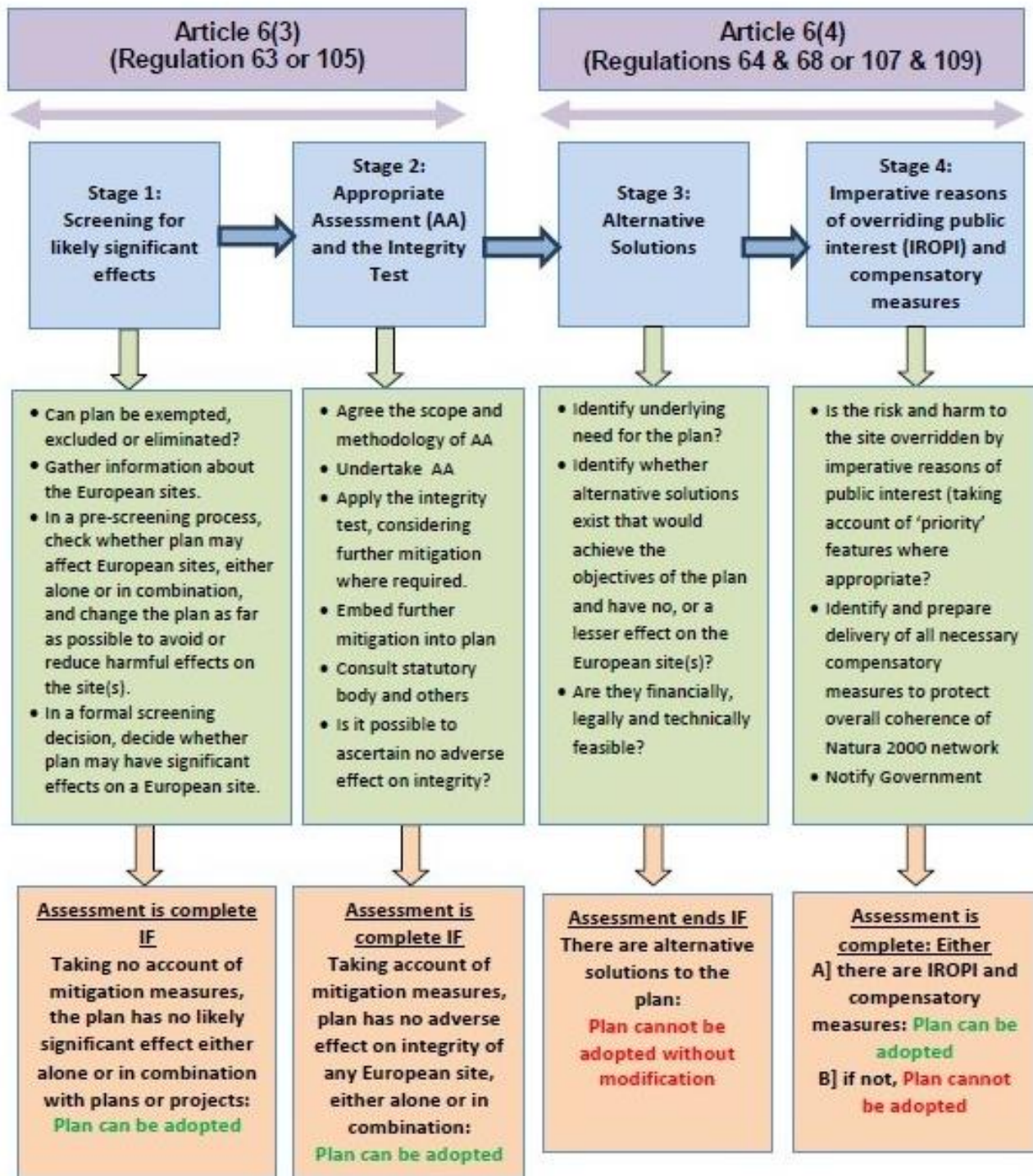
- 1.12 Although this HRA has been prepared to help the Council discharge its duties under the Habitats Regulations, the Council is the competent authority, and it must decide whether to accept this report or otherwise. Further, it should be noted that this HRA has been prepared for the purposes of preparing and examining the Plan. Individual allocations will need to be reviewed when they become the subject of an individual planning application, to ensure that if further assessment under the Habitats Regulations is necessary, it is undertaken in accordance with the requirements of appropriate assessment.

Process

- 1.13 Plans and projects which are directly connected with or necessary to the management of a European site may be exempt from the HRA process. For all other plans and projects, assessment proceeds through a step-by-step process. The step-by-step process of HRA is summarised in Figure 1.

³ ODPM Circular 06/2005: Biodiversity and Geological Conservation – Statutory Obligations and their Impact within the Planning System (16 August 2005), to be read in conjunction with the current NPPF, other Government guidance and the current version of the Habitats Regulations.

Outline of the four-stage approach to the assessment of plans under the Habitats Regulations



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Figure 1: Outline of the assessment of plans under the Habitat Regulations. Though dated prior to the latest amendments to the Regulations, the same tests still apply and it remains valid.

- 1.14 Throughout all stages, there is a continual consideration of the options available to avoid and mitigate any identified potential impacts. A competent authority may consider that there is a need to undertake further levels of evidence gathering and evaluation at the appropriate assessment stage in order to provide the necessary certainty. At this point the competent authority may identify the need to add to or modify the plan in order to adequately protect the European site, and these mitigation measures may be added through the imposition of particular restrictions and conditions.
- 1.15 For plans, the stages of HRA are often quite fluid, with the plan normally being prepared by the competent authority itself. This gives the competent authority the opportunity to repeatedly explore options to prevent impacts, refine the plan and rescreen it to demonstrate that all potential risks to European sites have been successfully dealt with.
- 1.16 When preparing a plan, a competent authority may therefore go through a continued assessment as the plan develops, enabling the assessment to inform the development of the plan. For example, a competent authority may choose to pursue an amended or different option where impacts can be avoided, rather than continue to assess an option that has the potential to significantly affect European site interest features.
- 1.17 After completing an assessment, a competent authority should only adopt a plan where it can be ascertained that there will not be an adverse effect on the integrity of the European site(s) in question. In order to reach this conclusion, the competent authority may have made changes to the plan, or modified the project with restrictions or conditions, in light of their Appropriate Assessment findings.
- 1.18 Where adverse effects cannot be ruled out, further exceptional tests are set out in Regulation 107. In exceptional cases, this allows a plan to be taken forward where there are no 'alternative solutions', where 'imperative reasons of overriding public interest' apply and where compensation can be delivered. It should be noted that meeting these tests is a rare last resort and ordinarily, competent authorities seek to ensure that a plan or project is fully mitigated for, or it does not proceed.
- 1.19 In such circumstances where a competent authority considers that a plan should proceed under Regulations 107, they must notify the relevant Secretary of State. Normally, planning decisions and competent authority duties are then transferred, becoming the responsibility of the Secretary of State, unless on considering the information, the planning authority is directed by the Secretary of State to make their own decision on the plan or project at the local level. The decision maker, whether the Secretary of State or the planning authority, should give full

consideration to any proposed ‘overriding reasons’ for which a plan or project should proceed despite being unable to rule out adverse effects on European site interest features, and ensure that those reasons are in the public interest and are such that they override the potential harm. The decision maker will also need to secure any necessary compensatory measures, to ensure the continued overall coherence of the European site network if such a plan or project is allowed to proceed. However, it is understood that the Council would not wish to pursue these derogations.

Definitions, references to case law and guidance

- 1.20 This HRA follows principles of case law, both UK and EU. It also refers as appropriate to the Habitats Regulations Assessment Handbook (Tyldesley and Chapman, 2013), to which Footprint Ecology subscribes. We also follow relevant government guidance.

- 1.21 Drawing on the Handbook, other relevant guidance and case law, we clarify the following terms used in the flow chart (Figure 1).

- 1.22 In Stage 1, A **‘likely significant effect’** following Waddenzee⁴, is a *‘possible significant effect; one whose occurrence cannot be excluded on the basis of objective information’*. It is a low threshold and simply means that there is a risk or doubt regarding such an effect. The screening stage is a preliminary examination, sometimes described as a coarse filter, or following Sweetman⁵, as *‘a trigger for the obligation to carry out an appropriate assessment’*. There should however be credible evidence to show that there is a real rather than a hypothetical risk of effects that could undermine a site’s conservation objectives. This was amplified in the Bagmoor Wind⁶ case where *‘if the absence of risk... can only be demonstrated after a detailed investigation, or expert opinion, [then] the authority must move from preliminary examination to appropriate assessment’*.

- 1.23 Following the People Over Wind judgement⁷, when making screening decisions for the purposes of deciding whether an appropriate assessment is required,

⁴ Waddenzee: European Courts C-127/02 Waddenzee 7th September 2004, reference for a preliminary ruling from the Raad van State.

⁵ Sweetman: European Court C – 258/11 Sweetman 11th April 2013, reference for a preliminary ruling from the Supreme Court of Ireland

⁶ Bagmoor Wind: UK courts Bagmoor Wind v The Scottish Ministers, Court of Session [2012] CSIH 93

⁷ *People Over Wind and Sweetman v Coillte Teoranta* (323-17) [2018] PTSR 1668

competent authorities cannot take into account any measures intended to avoid or reduce harmful effects upon a European site.

- 1.24 Stage 2 involves the **appropriate assessment and integrity test**. Here a plan can only be adopted if the competent authority can demonstrate that it will not adversely affect the integrity of the European site. This is precautionary approach and means it is necessary to show the absence of harm.
- 1.25 Following Champion⁸ '**appropriate**' is not a technical term but simply indicates that the assessment needs to be appropriate to the task in hand.
- 1.26 The **integrity** of a European site has been described as the 'coherence of its ecological structure and function, across its whole area, that enables it to sustain the habitat, complex of habitats and/or the levels of populations of the species for which it was classified⁹. An alternative definition, after Sweetman¹⁰, is 'the lasting preservation of the constitutive characteristics of the site'.
- 1.27 In terms of the burden of proof, the HRA of development plans was first made a requirement in the UK following a ruling by the European Court of Justice in EC v UK¹¹. However, the judgement¹² recognised that any assessment had to reflect the actual stage in the strategic planning process and the level of evidence that might or might not be available. This was given expression in the High Court (Feeney)¹³ which stated: "*Each ... assessment ... cannot do more than the level of detail of the strategy at that stage permits*".
- 1.28 The need to consider possible **in-combination** effects arises at stage 1 – the screening and also at stage 2 – the appropriate assessment and integrity test. The effects of the plan in-combination with other plans or projects are the cumulative effects which will or might arise from the addition of the effects of other relevant plans or projects alongside the plan under consideration. If during the stage 1 screening it is found the subject plan would have no likely effect alone, but might have such an effect in-combination then the appropriate assessment at stage 2 will proceed to consider cumulative effects. Where a plan is screened as having a likely significant effect alone, the appropriate assessment should initially concentrate on its effects alone.

⁸ *R (on the application of Champion v North Norfolk District Council)* [2015] 1 WLR 3170 at para 41

⁹ Para 20 of the ODPM Circ. 06/2005

¹⁰ *Sweetman v An Bord Pleanála* (C-258-11) [2014] PTSR 1092 at paragraph 39

¹¹ *Commission v UK* (C-6/04) [2005] ECR I-9017

¹² *Commission of the European Communities v UK* Opinion of Advocate General Kokott

¹³ *Feeney v Oxford City Council* [2011] EWHC 2699 Admin at paragraph 92

2. European sites in and around Exeter

Overview of potentially relevant European sites

- 2.1 We have used 20km from the City boundary as an initial area of search (20km providing a reasonable area of search within which policies could reasonably be considered to generate measurable effects). Air quality impacts at plan level are typically considered to relate to a 10km distance (Chapman & Kite, 2021) while generic analysis of Footprint Ecology visitor data to countryside sites in the UK (Weitowitz et al., 2019) indicates that the majority of visitors originate within a 12.6km radius. The choice of 20km is therefore precautionary.
- 2.2 Sites that fall within this initial area of search are listed in Table 1. SAC sites are shown in Map 1 and the map highlights those within 20km. Similarly Map 2 shows SPA and Ramsar sites and those which are within 20km. For the avoidance of doubt Dartmoor SAC lies beyond 20km and is excluded from further consideration. The nearest part of Dartmoor SAC is 20.6km from the edge of the Exeter administrative boundary and most of the SAC lies much further away from the western edge of the city (over 40km for some parts).

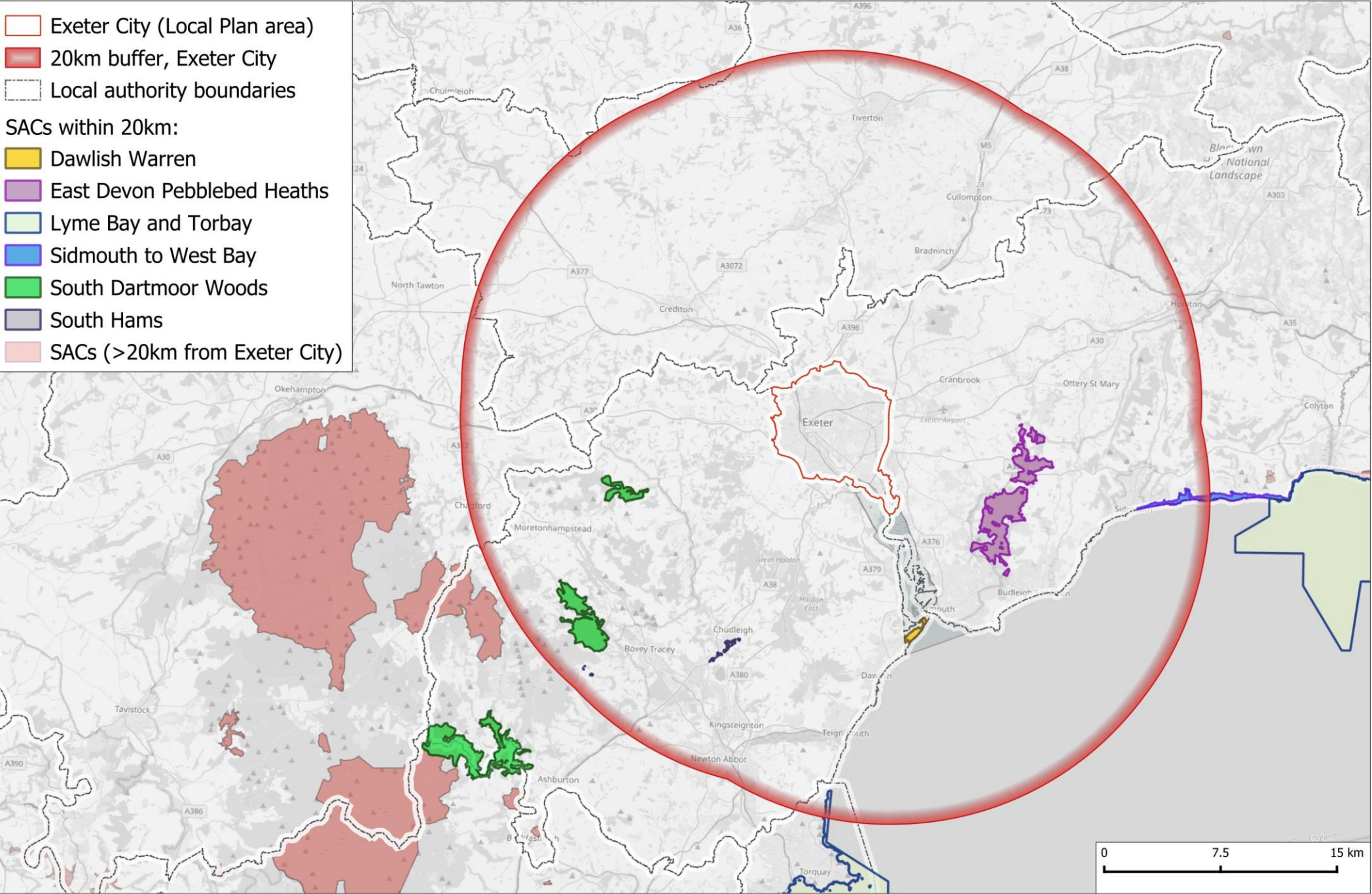
Table 1: European Sites within a 20km radius.

SAC	SPA	Ramsar
Dawlish Warren	East Devon Heaths	Exe Estuary
East Devon Pebblebed Heaths	Exe Estuary	
Lyme Bay & Torbay		
Sidmouth To West Bay		
South Dartmoor Woods		
South Hams		

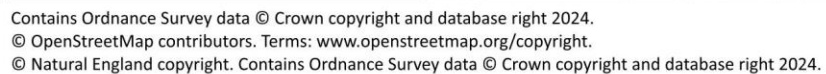
Overlapping site boundaries

- 2.3 It should be noted that the East Devon Pebblebed Heaths SAC and the East Devon Heaths SPA have identical boundaries and in the rest of this report we will refer to the East Devon Heaths SAC/SPA where we mean both sites together. Where we use the specific site name then the text is specific to the relevant site (i.e. the SAC or SPA). Similarly, we use the Exe Estuary SPA/Ramsar when referring to both the Exe Estuary SPA and Ramsar site together (again the boundaries overlap).

Map 1: SACs within 20km



 20km buffer, Exeter City
 Exeter City (Local Plan area)
 Local authority boundaries
 SPA/Ramsar sites within 20km:
 East Devon Heaths SPA
 Exe Estuary SPA/Ramsar



Potential impact pathways

- 2.4 Background information on the European sites and their qualifying features is provided in the appendices. Appendix 1 summarises the generic conservation objectives and Appendix 2 provides detail of the relevant European sites, listing their qualifying features, describing the sites and providing links to the relevant detailed conservation advice from Natural England. Appendix 3 lists the threats and pressures for each identified in the relevant site improvement plan.
- 2.5 The Plan relates to the growth within the city and therefore will predominantly involve brownfield sites and development within the existing urban area. Drawing on the background information relating to the European sites, potential impact pathways - ways in which elements of the Plan might conceivably impact the relevant European sites – could involve:
- General urban effects
 - Loss of functionally-linked land
 - Recreation
 - Hydrological effects (water quantity or quality)
 - Air quality
- 2.6 These are considered in turn below. The European sites have different qualifying features and as such different impacts are relevant for different sites. The local geography and distance from Exeter will also determine which sites are vulnerable in which ways.

General urban effects

- 2.7 Urban effects relate to impacts associated with development in very close proximity to European sites, through for example light pollution, noise, domestic cats, spread of invasive species etc. These can have implications for species present within the sites and can arise where in-filling or new development results in increased development around the periphery of European sites. The Exe Estuary SPA/Ramsar is the only site where these effects could arise, given the SPA/Ramsar boundary extends into the city boundary.

Loss of functionally linked land

- 2.8 The term functional linkage refers to the role or function that land or sea beyond the boundary of a European site might fulfil in terms of ecologically supporting the populations for which the site was designated or classified (see Chapman and Tyldesley, 2016 for discussion and definition).

- 2.9 This pathway is potentially relevant within Exeter only in relation to the Exe Estuary SPA/Ramsar, as wading birds and Brent Geese will sometimes use areas outside the SPA/Ramsar boundary for roosting or feeding. The direct loss of sites to development would have the potential to undermine the conservation objectives for the site. Any disturbance effects (e.g. from recreation use) on such sites would fall under the recreation heading (see below).

Recreation impacts

- 2.10 Recreation impacts involve effects on a European site caused by human use of site for recreational activities, such as walking, riding, sports, organised activities etc. Any increase in local residential accommodation will result in more people and the risk of direct disturbance of species by people, dogs or vehicles, trampling, erosion, fire, vandalism, fly tipping etc.
- 2.11 Risks can occur on any site where there is the scope for public access and sensitive features are present. Recreation impacts are already recognised, and a strategic mitigation scheme relating to impacts from housing growth is in place, for the East Devon Heaths SAC/SPA, Exe Estuary SPA/Ramsar and Dawlish Warren SAC. As such these sites clearly need to be considered in the screening.
- 2.12 The recreation impacts pathway is also potentially relevant for the South Dartmoor Woods SAC. This SAC lies within Dartmoor National Park and consists of seven individual sites within two clusters, one near Lustleigh and one near Buckfastleigh. There are 7 component SSSIs of which the Teign Valley Woods SSSI is the closest to Exeter (8.7km from the city boundary). The next closest are Bovey Valley Woodlands SSSI (around 15.4km at its closest).
- 2.13 High levels of visitor footfall can create a range of problems in woodlands (for general reviews of recreation impacts and woodland see: Anderson and Radford, 1992; Corney et al., 2008; Lowen et al., 2008a; Liley et al., 2010, 2019; Marzano and Dandy, 2012; Ryan, 2012). The paths alongside the rivers provide attractive and popular walks and where people (and their pets) access the water's edge, erosion of the banksides can be damaging. Heathland habitats (another qualifying feature of the SAC) are also vulnerable to recreation impacts, for example from trampling damage, enrichment and increased fire risk (see Underhill-Day, 2005 for review). Natural England¹⁴ have however advised that they do not recognise the potential

¹⁴ Consultation response to Exeter Plan: Outline Plan Consultation, 5th December 2022. NE Ref 407880.

for recreation impacts at this site and, in line with their advice, recreation impacts can be scoped out for this site.

- 2.14 There is also a suite of coastal sites that fall some distance from Exeter: Lyme Bay and Torbay SAC, Sidmouth to West Bay SAC and South Hams SAC. Impacts from recreation can be ruled out for these sites due to the distances involved. While recreation impacts could be relevant (e.g. Liley and Bishop, 2022), risks relate to specialist activities and very specific locations (see Liley and Bishop, 2022 for discussion) which would not be relevant to growth in Exeter. Furthermore, the closer proximity of the Exe Estuary and Dawlish Warren mean these sites are likely to draw the majority of use by any residents of Exeter wanting to visit the coast.

Hydrological effects (water quality & availability)

- 2.15 Hydrological effects can occur as a result of changes to local water quality or from the interruption, reduction or other interference of local hydrology, including groundwater, surface standing water or watercourses.
- 2.16 Such impacts relate primarily to European sites supporting wetland or aquatic habitats and sites that are either subject to abstraction for drinking water or those which are fed directly by relevant wastewater treatment works. The only site potentially at risk in the context of Exeter is therefore the Exe Estuary SPA/Ramsar.
- 2.17 In freshwater habitats and estuaries, increased levels of nutrients (especially nitrogen and phosphorus) can speed up the growth of certain plants, disrupting natural processes and impacting wildlife. This process (called 'eutrophication') damages these water dependent sites and harms the plants and wildlife that are meant to be there. This can put sites in 'unfavourable condition'. Natural England has issued advice¹⁵ for several local planning authorities highlighting the need to carefully consider the nutrients impacts of any new plans and projects on internationally protected Habitats Sites, and whether mitigation is needed to protect sites from additional nutrient pollution. Several water dependent European sites across England are in 'unfavourable condition' for excess nitrogen and/or phosphorus and these are the focus of this advice. None of the sites within 20km of Exeter City have been highlighted by Natural England.

Air Quality

- 2.18 The primary impact mechanism for air quality relates to increased traffic emissions associated with new development. European sites within a 10km radius of a local

¹⁵ <https://publications.naturalengland.org.uk/publication/6687601766694912>

planning authority boundary are potentially relevant (Chapman & Kite, 2021) and Natural England guidance explains that protected sites within 200m of the edge of a road require further assessment. The guidance continues to advise however that, where there is a credible risk that air quality impacts may extend beyond 200m, additional sites can be scoped in.

- 2.19 Using these criteria three European sites have been identified as potentially relevant in respect of effects associated with air quality effects from traffic as they are within 10km of Exeter City and have a motorway, an A road or a B road within 200m:
- Exe Estuary SPA/Ramsar: M5, A376 and A379
 - East Devon Heaths SAC/SPA: A3052, B3180
 - South Dartmoor Woods SAC: B3212
- 2.20 We have not included the Sidmouth to West Bay SAC in the above bullets as while roads such as the B3172 and B3174 are within 200m of the SAC boundary, they are over 26km from the city boundary.
- 2.21 Road sections are shown in Map 3 and a summary of the sensitivity of each European site to air quality impacts is given in Table 2.

Table 2: Inherent sensitivity of sites within 200m of roads to air quality impacts. Quoted figures are drawn from the Air Pollution Information System (APIS) website¹⁶

European site	Inherent sensitivity of site
Exe Estuary SPA/Ramsar	The APIS website shows that none of the qualifying features are sensitive to direct effects of ammonia or nitrogen oxides. The only potential sensitivity is therefore from nitrogen deposition and associated changes to supporting habitats for the qualifying species. The habitat identified as sensitive in APIS is the saltmarsh habitat, and a critical load of 10-20kg/ha/yr has been assigned. Baseline nitrogen deposition levels across the site are between 10-13kg/ha/yr which is within the lower end of critical load range reducing the potential risk to site integrity. Only 6.7% of local nitrogen deposition contributions are attributed to road sources. Saltmarsh habitat is spatially constrained within the site; with Magic map showing saltmarsh communities being present primarily in the northern end of the site (north of Exton), with a smaller presence around Dawlish Warren and along the Royal Avenue in Exmouth. The credible evidence of a real risk from air quality change is therefore constrained to areas within the site where saltmarsh communities are present, but the relative contribution from roads to local nitrogen

¹⁶ <https://www.apis.ac.uk/>

European site	Inherent sensitivity of site
	deposition, the baseline deposition being within the lower end of the critical load range all moderate the risk to site integrity from road sources.
East Devon Heaths SAC/SPA	All qualifying features for which the SAC is designated are potentially sensitive to air quality impacts. The critical load range of 5-15kg N/ha/yr applies alongside the more stringent critical level for ammonia of 1ug/m ³ and the roads affected by the Local Plan run through the site of adjacent to it. Baseline values for ammonia range from 1.5-1.9ug/m ³ and for nitrogen deposition range from 12-15kg/ha/yr). These sites are therefore considered to be sensitive to potential air quality effects from increased traffic flows along affected roads.
South Dartmoor Woods	Both qualifying features (European dry heaths and Old sessile oak woods with Ilex and Blechnum in the British Isles) are potentially sensitive to air quality with the critical load range of 5-15kg N/ha/yr (for dry heath feature) and 10-15kg N/ha/yr for the woodland. The more stringent critical level for ammonia also applies (1ug/m ³).

2.22 Further consideration is given with respect to each road section in Table 3. This includes summary figures from traffic predictions undertaken by Devon County Council¹⁷ that predict the potential changes in traffic as a result of plan-led growth in East Devon and in Exeter (separately and combined).

Table 3: European Sites within 200m of roads and relevant road sections

European site	Roads within 200m	Approx distance of road from European site	Commentary regarding credibility of any risk
Exe Estuary SPA/Ramsar	M5	adjacent	The SPA features are listed as not sensitive to ammonia or NOx concentrations but a critical load of 10-20 kg/ha/yr for saltmarsh should be applied in respect of N deposition. Background levels are 13kg/ha/yr meaning only the lower end of the critical load range is exceeded. The M5 crosses the Exe Estuary on what is predominantly a raised flyover. The M5 is part of the UK strategic road network and flows are subject to control at a national level; the increase in flows represents 0.2% of current baseline flows. Saltmarsh communities are present below the bridge for approximately 160m meaning only a very small spatial extent

¹⁷ Predictions provided as a spreadsheet for the road sections as named in the table. Base traffic conditions were determined using a combination of continuous traffic count sites and manual classified counts on roads of interest through the county. 2022 data has been used as the base in most cases. Background growth was applied using local growth factors obtained from TEMPRO v8; growth on the M5 obtained using growth factors from the National Road Traffic Projections. Development traffic was distributed using usual commute locations determined from 2011 census data. Data has been used at the MSOA level to establish trip destinations, with some additional refinement applied to larger output areas.

European site	Roads within 200m	Approx distance of road from European site	Commentary regarding credibility of any risk
			of sensitive supporting SPA habitat is potentially at risk. The elevation of road above the SPA will influence the dispersion of air pollutants and minimise localised road effects on ground level vegetation. In light of the above it is not considered that there is credible evidence of a real risk to the integrity of the site from traffic flows on the M5 flyover. No credible evidence of a real risk
	A376 (Exmouth)	30m	The nearest saltmarsh communities are located 60m from the road. The distance is such that contributions from traffic on the road will be significantly reduced. Baseline N deposition is 11-12kg/ha/yr which is within the lower end of the critical load range for the supporting SPA habitat. The spatial extent of the SPA within 200m of the A376 is 6.7ha which represents 0.25% of the SPA (which extends to 2677ha overall). The increase in flows represents 2.7% increase from baseline. There is no credible evidence of a real risk.
	A379 (Bridge Road)	adjacent	Bridge road runs adjacent to the northern boundary of the SPA and, saltmarsh habitat is present below the bridge for a stretch of around 150m but the elevation of the road above the SPA will influence the pollutant dispersion and reduce localised impacts. The baseline nitrogen deposition is 13kg/ha/yr which is towards the lower end of the critical load range further reducing the risk to the qualifying features. increase in flows represents 2.7% increase from baseline. There is no credible evidence of a real risk.
	A379 (Sannerville Way)	75m	No saltmarsh habitat present within 200m of the road. No credible evidence of a real risk
	A379 (Starcross)	adjacent	No saltmarsh habitat present within 200m of the road. No credible evidence of a real risk
East Devon Heaths SAC/SPA	B3179 (towards Budleigh Salterton)	adjacent	Traffic modelling indicates no increase in traffic as a result of growth in Exeter. No credible evidence of a real risk
	A3052 (W. of N. Poppleford)	adjacent	Traffic modelling indicates no increase in traffic as a result of growth in Exeter. No credible evidence of a real risk
	B3180 (North)	adjacent	Traffic modelling indicates no increase in traffic as a result of growth in Exeter. No credible evidence of a real risk
	B3180 (South)	adjacent	Traffic modelling indicates no increase in traffic as a result of growth in Exeter. No credible evidence of a real risk
South Dartmoor Wood SAC	B3212 (Strawberry Hill to Docombe)	adjacent	Traffic modelling indicates no increase in traffic as a result of growth in Exeter. No credible evidence of a real risk

2.23 Drawing on the findings in Table 3, there is no credible risk for any of the European sites in terms of air quality and traffic increases along the affected roads. These sites can be scoped out at this stage with respect to air quality and no further assessment in-combination with other plans or projects is required.

Legend:

- Exeter City (Local Plan area)
- Local authority boundaries
- East Devon Pebblebed Heaths
- Exe Estuary
- South Dartmoor Woods

Roads within 200m:

- Motorway
- A Road
- B Road
- other

The map displays the Exeter City area and surrounding regions. Key features include the Exe Estuary (blue), South Dartmoor Woods (green), and East Devon Pebblebed Heaths (purple). Major roads are shown, including the A30, A379, A376, A380, A383, and A3052. The map also shows the locations of Exeter City, Exeter Airport, and various surrounding villages and towns. A scale bar indicates distances up to 5 km.

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Summary of relevant sites and impact pathways

- 2.24 Potential impact pathways are summarised by European site in Table 4. This table provides the context for the screening for likely significant effects and shows which sites could be relevant and the pathways that need to be checked while screening the Plan.

Table 4: Potential impact pathways with a tick indicating where the pathway is relevant to the site. Distances are the approximate distances from the nearest part of the European site to the nearest part of the city boundary. No distances are given for the Exe Estuary SPA/Ramsar as it falls within the city boundary. Grey shaded rows indicate sites that are scoped out for any further consideration.

Site	Distance (km)	General urban effects	Loss of Functionally-linked	Recreation impacts	Hydrological impacts (water quality & availability)	Air Quality	Summary of key concerns
East Devon Pebblebed Heaths SAC	5.4			✓			Included in existing mitigation strategy relating to recreation. Crossed by roads but traffic modelling indicates no increases in traffic from Exeter. Well outside city boundary and above the city, so no issues from run off etc and hydrology of site linked to groundwater (not likely to be affected by development in Exeter) so no hydrological links. Too far outside city for any risk of urban effects or loss of functionally-linked land.
East Devon Heaths SPA	5.4			✓			As above.
Dawlish Warren SAC	7.0			✓			Included in existing mitigation strategy relating to recreation. Air quality not relevant due to location of site in relation to roads. Train track separates site from housing. Too far from city for risks relating to hydrology, urbanisation etc.
Exe Estuary SPA		✓	✓	✓	✓		Site falls within city boundary. Direct hydrological links and easy recreational access from city. Air quality impacts ruled out predominantly due to locations of roads in relation to sensitive feature (saltmarsh).
Exe Estuary Ramsar		✓	✓	✓	✓		As above.
Lyme Bay & Torbay SAC	17.7						Marine SAC with sea caves and reefs the qualifying interest. Links only plausible from recreation and quite specialist activities (such as coasteering) and therefore ruled out from further assessment.
Sidmouth to West Bay SAC	15.4						Habitat interest relates to cliffs and beaches. Distance from the city means site can be ruled out from further assessment.
South Dartmoor Woods SAC	8.7						Woodland sites within relatively close proximity to city. Recreation impacts scoped out on basis of NE advice; air quality issues ruled out based on traffic modelling.
South Hams SAC	11.2						Site interest relates to bats and coastal (predominantly cliff) habitats. Distance means site can be ruled out from further assessment.

3. Screening for Likely Significant Effects

- 3.1 The screening is the initial stage in the four-stage process of HRA. The screening for likely significant effects of a plan involves checking all aspects of the plan and identifying any areas of potential concern, which are then examined in more detail in the appropriate assessment (stage 2) of the HRA. The check for likely significant effects provides an initial test of the plan. It is undertaken to enable the plan maker as competent authority to do two things. Firstly, it narrows down and highlights those elements of the plan that may pose a risk to European sites. Secondly, where an option poses a risk but is a desired element of the plan, the screening identifies where further assessment is necessary in order to determine the nature and magnitude of potential impacts on European sites and what could be done to avoid, cancel, reduce or eliminate those risks. Early, initial screening at previous iterations of the Plan can allow the Plan maker to refine the Plan or commission further research/modelling work and incorporate the necessary mitigation.

What constitutes a likely significant effect?

- 3.2 Where the screening identifies risks that cannot be avoided with simple clarifications, corrections or instructions for project level HRA, a more detailed assessment is undertaken to gather more information about the likely significant effects and give the necessary scrutiny to potential mitigation measures. This is the appropriate assessment stage of HRA.
- 3.3 A likely significant effect could be concluded on the basis of clear evidence of risk to European site interest, or there could be a scientific and plausible justification for concluding that a risk is present, even in the absence of direct evidence. The latter is an example of the precautionary approach, which is embedded through the HRA process. The precautionary principle should be applied at all stages in the HRA process and follows the principles established in domestic and EU case law.
- 3.4 The screening in this report looks at policies prior to any avoidance/reduction/mitigation measures in line with People Over Wind¹⁸;

¹⁸ People Over Wind: European Court Case C-323/17 People Over Wind & Peter Sweetman v Coillte Teoranta 12 April 2018

mitigation can only be considered at Appropriate Assessment stage. People Over Wind clarified the need to carefully explain actions taken at each HRA stage, particularly at the screening for likely significant effects stage. The Judgment highlights the need for clear distinction between the stages of HRA, and good practice in recognising the function of each. The screening for likely significant effects stage should function as a checking stage (regardless of avoidance/reduction/mitigation measures), to determine whether further assessment is required. Assessing the nature and extent of potential impacts on European site interest features, and the robustness of mitigation options, should be done at the appropriate assessment stage.

The screening

- 3.5 Map 4 shows the allocations within the Plan, showing the broad distribution of growth in relation to the city boundary and the adjacent European sites.
- 3.6 The full screening is set out in Appendix 4, with a policy by policy check of all elements of the Plan. Inevitably there will be precaution in screening elements of the plan, as the purpose of screening for likely significant effects is to identify where there is either no possibility of an effect, or where there are uncertainties.
- 3.7 Appendix 5 provides a summary of the distances from each of the allocation sites to each of the relevant European sites. This gives further context and background for each allocation and the risks posed. The shading and colours used within the table flag sites that fall within particular distance bands and in particular those that are particularly close to European sites (and therefore pose particular risks, for example with respect to urban effects).

Screening conclusions

- 3.8 The screening identified a number of risks from elements of the plan and general urban effects, recreation and hydrological impacts. These risks related to a range of policies relating to residential housing and employment provision. In addition, policies NE2 Valley Parks and NE3 Biodiversity are bespoke policies intended to avoid or reduce harmful effects on a European site and therefore need to be taken forward to appropriate assessment. All relevant policies that are to be taken forward to the appropriate assessment stage are summarised in Table 5.
- 3.9 For general urban effects, likely significant effects were identified for the Exe Estuary SPA/Ramsar from the overall quantum of growth (set out in H1 and H2).
- 3.10 Loss of functionally linked land is a concern that was raised by Natural England following the Regulation 18 version of the Plan¹⁹. Sites that were or low-lying land, open ground or contained extensive open grassland (feeding for species such as Brent Goose or Curlew) and were not subject to frequent disturbance could have the potential to support relevant birds. All individual allocations were therefore reviewed in GIS using aerial imagery to check the habitats present, proximity to the Exe Estuary SPA/Ramsar and potential that they might provide any foraging or roosting habitat for qualifying bird species. A selection of the most likely sites were visited in the autumn 2024 to check the general layout, potential for use and the presence of any birds. From the GIS review, no sites were believed likely to provide any suitable habitat for qualifying birds and the site visits revealed that of the three most likely sites, all were small, constrained by surrounding infrastructure/access and highly unlikely to support qualifying features. One of the sites is currently used as a golf driving range (Site ref 95), another was adjacent to a construction site (and considerable disturbance), one site was a small, overgrown field with limited sight lines, and opposite a new development (Site ref 94) and the final contained a pylon (Site ref 91), with powerlines overhead (potentially limiting flight lines and providing perches for Peregrines, a potential predator), see Figure 2 for details. Given the nearby presence of Exminster Marshes and Bowling Green Marsh (both within the SPA/Ramsar) there are extensive areas of freshwater wetland and grassland available to birds at all tide states in the general area. As such, likely significant effects from a loss of functionally-linked land can be ruled out.

¹⁹ Representations from Natural England on the Full Draft of the Exeter Local Plan, NE ref 455026, 460188 and 461251. 11th January 2024



Figure 2: Photos taken during site visit on 20/09/2024. Sites 91 (bottom left) and site 95 (right) referenced in text.

- 3.11 For recreation, likely significant effects were identified alone for the Exe Estuary SPA/Ramsar, East Devon Heaths SAC/SPA and Dawlish Warren SAC, from the overall quantum of growth and in-combination for individual allocation policies. Recreation mitigation is set out in Policies NE2 and NE3.
- 3.12 For hydrological impacts, likely significant effects were identified alone for the overall quantum of growth and in-combination for the individual allocation policies with risks to the Exe Estuary SPA/Ramsar.

Table 5: Policies screened in for consideration at appropriate assessment. Table includes those policies screened in for likely significant effects and those policies (darker green shading) that are bespoke policies intended to avoid or reduce harmful effects on a European site.

Policy	Description	Potential risks	Comments
H1: Housing requirement	Sets quantum of growth, targeting the delivery of at least 642 homes per year between 2021 and 2041. 13,975 homes proposed.	LSEs: Urban effects alone (Exe Estuary SPA/Ramsar); Recreation alone (Exe Estuary SPA/Ramsar, East Devon Heaths SAC/SPA, Dawlish Warren SAC); Hydrological impacts alone (Exe Estuary SPA/Ramsar).	Total includes 2,311 completions (2021-2024) and approximately 5,289 homes with existing planning consents. New homes anticipated are approximately 5,369 homes on allocated sites and 1,006 windfall.
H2: Housing allocations and windfalls	Lists development sites that are allocated.	LSEs: Urban effects alone (Exe Estuary SPA/Ramsar); Recreation alone (Exe Estuary SPA/Ramsar, East Devon Heaths SAC/SPA, Dawlish Warren SAC); Hydrological impacts alone (Exe Estuary SPA/Ramsar).	Overall amount of growth in H1 broken down across individual allocations. All allocations checked on maps/aerial imagery and some site visits undertaken to confirm no risks with respect to functionally-linked land.
NE2: Valley Parks	General policy supporting and setting criteria for appropriate development within the Valley Parks.	Screened in for further consideration at appropriate assessment in accordance with People vs Wind. Policy refers to Suitable Alternative Natural Greenspace and also the Riverside and Ludwell Parks Masterplan. As clear from the policy, these sites will function as mitigation to address recreation pressure on the European sites (East Devon Heaths SAC/SPA); Exe Estuary SPA/Ramsar; Dawlish Warren SAC).	Policy does not allocate the sites or specify scale of mitigation, so screened in on a precautionary basis.
NE3: Biodiversity	Plan-wide policy setting environmental protection (including designated sites), mitigation requirements and biodiversity net gain.	Screened in for further consideration at appropriate assessment in accordance with People vs Wind. Policy refers to mitigation to address recreation pressure on the European sites (East Devon Heaths SAC/SPA); Exe Estuary SPA/Ramsar; Dawlish Warren SAC).	Screened in for further consideration as supporting text references the recreation mitigation strategy and need for mitigation for recreation (where relevant) indicated in policy.
SBA1: Water Lane – Site reference 15	Allocation. 36.2 ha allocated for a mixed-use development, 1,861 homes.	LSE: Recreation in-combination (Exe Estuary SPA/Ramsar; East Devon Heaths SAC/SPA); Hydrological impacts in-combination (Exe Estuary SPA/Ramsar).	1.4km from Exe Estuary SPA/Ramsar. Site is virtually all brownfield so no credible risks in relation to loss of functionally-linked land or general urban effects. Policy includes specific requirement for mitigation in relation to recreation impacts.

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Policy	Description	Potential risks	Comments
SBA2: East Gate – Site reference 145	Allocation. 6.1 ha allocated for mixed-use development, 609 homes.	Recreation in-combination (Exe Estuary SPA/Ramsar; East Devon Heaths SAC/SPA); Hydrological impacts in-combination (Exe Estuary SPA/Ramsar).	3.5km from Exe Estuary SPA/Ramsar. Brownfield site in centre, so no credible risks in relation to loss of functionally-linked land or general urban effects. Policy includes specific requirement for mitigation in relation to recreation impacts.
SBA3: Red Cow – Site reference 146	Allocation. 3.8ha allocated for residential primarily, but mixed-use development, 442 homes.	Recreation in-combination (Exe Estuary SPA/Ramsar; East Devon Heaths SAC/SPA); Hydrological impacts in-combination (Exe Estuary SPA/Ramsar).	Brownfield site, well to the north of the Exe Estuary SPA/Ramsar (4.6km) so no credible risks in relation to loss of functionally-linked land or general urban effects. Policy includes specific requirement for mitigation in relation to recreation impacts.
SBA4: Exe Bridges Retail Park – Site reference 142	Allocation. 1.8ha allocated for mixed-use development, delivering 201 homes.	Recreation in-combination (Exe Estuary SPA/Ramsar, East Devon Heaths SAC/SPA); Hydrological impacts in-combination (Exe Estuary SPA/Ramsar).	Brownfield site, 3.5km from Exe Estuary SPA/Ramsar. No potential for loss of functionally-linked land. Policy includes specific requirement for mitigation in relation to recreation impacts.
SBA5: South Gate – Site reference 46	Allocation. 1.5ha allocated for primarily residential but a mixed-use development, provision of 81 homes.	Recreation in-combination (Exe Estuary SPA/Ramsar; East Devon Heaths SAC/SPA); Hydrological impacts in-combination (Exe Estuary SPA/Ramsar).	Largely brownfield site (car park) 3.3km from Exe Estuary SPA/Ramsar. No credible risks in relation to loss of functionally-linked land or general urban effects. Policy includes specific requirement for mitigation in relation to recreation impacts.

4. Appropriate assessment topic: Urban effects

Relevant policies from initial LSE screening

- 4.1 Likely significant effects were identified alone with respect to the Exe Estuary SPA/Ramsar for policies:
- H1 Housing requirement;
 - H2 Housing allocations.
- 4.2 These policies set the overall level of growth and locations. Particular risks relate to those sites that are within 500m of the Exe Estuary SPA/Ramsar (see Appendix 5):
- Garages at Lower Wear Road, 180m from the Exe Estuary SPA/Ramsar;
 - Land to the west of Newcourt Road, Topsham 500m from the Exe Estuary SPA/Ramsar;
 - Land at Topsham Golf Academy, 230m from the Exe Estuary SPA/Ramsar.

Introduction

- 4.3 Urban effects relate to issues where development is close to the European site boundary and is an umbrella term relating to impacts such as light, noise, cat predation, fly tipping, increased fire risk, spread of invasive species (e.g. from gardens and garden waste) and vandalism. Where housing is directly adjacent to sites, access can occur directly from gardens and informal access points. Use will spill over from adjacent gardens and adjacent green space next to urban areas is often subject to a range of activities and issues that are not necessarily compatible with nature conservation. We treat urban effects separately from recreation as urban effects are specific to where housing is in close proximity and urban effects are not addressed through the existing mitigation strategy. None of the allocations are considered to have any potential to be functionally-linked and therefore none of the risks considered in this section relate to the loss of supporting habitat used by qualifying features.

Urban effects and the Exe Estuary SPA/Ramsar

- 4.4 The only European site relevant to development in Exeter in this respect is the Exe Estuary SPA/Ramsar.
- 4.5 Risks from urban effects for the Estuary could include increased fire incidence, potentially a concern only during dry periods around saltmarsh and fringing vegetation (reedbeds for example). Fires can start in a range of ways, including deliberate arson, children playing, campfires, barbeques, sparks from vehicles, discarded cigarettes etc. Studies of fire incidence have shown higher incidence of fires in locations with higher levels of housing within 500m of the site boundary (Kirby and Tantram, 1999a). Light pollution is also a risk, potentially affecting foraging behaviour and distribution of birds (Longcore and Rich, 2004; Santos et al., 2010; Dwyer et al., 2013)
- 4.6 Cat predation (Hall et al., 2016; Loss and Marra, 2017; Kays et al., 2019; e.g. Cecchetti, Crowley and McDonald, 2021) is potentially a risk only where aggregations of small waders or other waterbirds are accessible to cats. Fly-tipping and dumping of garden waste resulting in contamination and spread of non-native species are also a risk, but only likely to be of concern where the upper marsh is accessible and adjacent to roads or paths.
- 4.7 Three allocations were identified from the screening due to their particular close proximity to the Exe Estuary SPA/Ramsar; all are within 500m of the European site boundary. These are considered in more detail below.

Garages at Lower Wear Road

- 4.8 This allocation is for 12 houses and is approximately 180m at its closest from the SPA/Ramsar. It is screened from the SPA/Ramsar by existing housing. The closest part of the SPA/Ramsar is marshland that is potentially accessible in dry conditions (although there is a ditch that will restrict access to most of the marsh) and currently separated from the road (Glasshouse Lane) by a thin line of trees and dilapidated fence. The marsh does not support high numbers of birds and the ditch provides some protection (e.g. from cats) but could be vulnerable to impacts from fire or from fly tipping. These risks could be addressed at project level and are potentially easily mitigated (given the size of the development and distance involved) by some improved fencing or better boundary along the edge of Glasshouse Lane. Policy NE3 ensures development will only proceed with project level HRA provided the necessary

checks and reasonable certainty that adverse effects on integrity can be ruled out.

Land to the west of Newcourt Road, Topsham

- 4.9 This allocation is for 56 homes and is on the outskirts of Topsham. It currently comprises a bungalow, outbuildings and a grassy field. At its closest point it is 500m from the Exe Estuary SPA/Ramsar. This distance means light pollution, cat predation and dumping of garden waste etc can be discounted. The nearest parts of the European site comprise intertidal mudflat (soft sediment) and there is minimal access to the shoreline (due to numerous private gardens). This means that fire risk can be ruled out. As such, urban effects can be eliminated for this location.

Land at Topsham Golf Academy

- 4.10 This allocation for 54 homes lies to the north of Exeter Road and is separated from the Exe Estuary SPA/Ramsar by multiple rows of existing houses and private gardens. The allocation has a public footpath running along the northern edge, linking Newcourt Road and Exeter Road. The allocation is therefore set back from the estuary and there is no direct access to the shoreline. The distance and location means fire risk, invasive species, light/noise pollution and cat predation can all be ruled out.

Key findings: Urban effects

Urban effects relate to issues where development is close to the European site boundary and is an umbrella term relating to impacts such as light, noise, cat predation, fly tipping, increased fire risk, spread of invasive species (e.g. from gardens and garden waste) and vandalism.

Only three allocations are within 500m of the Exe Estuary SPA/Ramsar (and therefore close enough to have potential risks from urban effects). Of these, there are no credible risks from two of the sites due to their location. One site (Garages at Lower Wear Road) is flagged as having a low risk but a need to be checked at the project level, once detailed designs are available. Mitigation may be required in the form of better boundary treatment, signage or vegetation management near the allocation site. Policy NE3 ensures development can only proceed where there are no adverse effects on integrity and as such ensures project level HRA is undertaken.

Given the limited number of allocated sites in proximity to the Exe Estuary SPA/Ramsar and their respective distances from the SPA boundary, risks can be ruled out alone for the individual sites and for the in-combination effects of growth in Policies H1 and H2. There is no need for in-combination assessment.

5. Appropriate assessment topic: Recreation

Relevant policies from initial LSE screening

- 5.1 The screening identified likely significant effects alone from the overall housing growth proposed in the plan, as set out in H1: Housing requirement and H2: Housing allocations, for the Exe Estuary SPA/Ramsar, East Devon Heaths SAC/SPA and Dawlish Warren SAC.
- 5.2 Likely significant effects were also triggered in-combination for the individual allocations:
- SBA1: Water Lane – Site reference 15
 - SBA2: East Gate – Site reference 145
 - SBA3: Red Cow – Site reference 146
 - SBA4: Exe Bridges Retail Park – Site reference 142
 - SBA5: South Gate – Site reference 46
- 5.3 Policies NE2 and NE3 relate to mitigation for recreation impacts and were therefore screened in for further consideration.

Introduction

- 5.4 Postcode data indicates that there were around 57,673 residential properties within Exeter in 2023. The proposed level of growth in H1 of 13,975 new dwellings therefore represents an increase in the number of residential properties of around 24% for the overall growth²⁰. While occupancy levels may change overtime this clearly represents a potential marked increase in the population living in the city and therefore the potential for a marked uplift in recreational use of surrounding countryside sites.
- 5.5 In the UK there is considerable overlap between nature conservation and recreation. Many of our most important nature conservation sites have legal rights of access, for example through Public Rights of Way or Open Access through the Countryside and Rights of Way Act (CRoW) 2000. People are often drawn to sites that are important for nature conservation as they are large, scenic and often few other alternatives exist. Recreation use can include a variety of activities, ranging from the daily dog walks to competitive

²⁰ Note that the 13,975 figure includes existing completions (2,311 completions), which brings the level of additional growth to around 20%.

adventure and endurance sports. Visits to the natural environment have shown a significant increase in England as a result of the increase in population and a trend to visit more (O'Neill, 2019). The issues are particularly acute in southern England, where population density is highest. The covid pandemic resulted in a further marked increase in use of local countryside sites (Burnett et al., 2021; Natural England and Kantar Public, 2021) and a marked uplift in dog ownership (Morgan et al., 2020).

- 5.6 There can be a difficult balancing act between providing for an increasing demand for access without compromising the integrity of protected wildlife sites. There is now a strong body of evidence showing how increasing levels of access can have negative impacts on wildlife. Issues are varied and include disturbance, increased fire risk, contamination and damage (Underhill-Day, 2005; Lowen et al., 2008a; for general reviews see: Liley et al., 2010, 2019; Ross et al., 2014).
- 5.7 The issues are not however straightforward. It is now increasingly recognised that access to the countryside is crucial to the long term success of nature conservation projects, for example through enforcing pro-environmental behaviours and a greater respect for the world around us (Richardson et al., 2016). Access also brings wider benefits to society that include benefits to mental/physical health (Pretty et al., 2005; Lee and Maheswaran, 2011; Keniger et al., 2013; Bell et al., 2018) and economic benefits (ICRT, 2011; ICF GHK, 2013; Keniger et al., 2013; The Land Trust, 2018). Nature conservation bodies are trying to encourage people to spend more time outside and government policy is also promoting countryside access in general (e.g. through enhancing coastal access).

Potential sites and risks

- 5.8 For the Exe Estuary SPA/Ramsar, Dawlish Warren SAC and the East Devon Heaths SAC/SPA concern about recreation impacts and links to local housing growth are long standing and a strategy was established in 2014 to mitigate the impacts from residential development. Public access/disturbance is identified in the respective site improvement plans (produced by Natural England) as a current pressure and/or future threat at all three sites. Recreation issues have the potential to undermine the conservation objectives of the European sites (where likely significant effects have been identified) in a range of ways (see Table 6).

Table 6: Summary of risks to the relevant European sites from recreation and urban effects.

Impact	Exe Estuary SPA/Ramsar	Dawlish Warren SAC	East Devon Heaths SPA/SAC	Notes	References and examples
Disturbance to breeding birds			✓	Risks from reduced breeding success and avoidance of otherwise suitable habitat.	Murison (2002); Liley & Clarke (2003); Murison <i>et al.</i> (2007).
Disturbance to wintering waterbirds	✓			Risks from avoidance of otherwise suitable areas, reduced feeding rate, stress and increased energetic costs.	Goss-Custard & Verboven (1993); Stillman <i>et al.</i> (2001); West <i>et al.</i> (2002); Liley <i>et al.</i> (2011)
Increased fire risk		✓	✓	Fire risk linked to recreation through discarded cigarettes, BBQs etc.	Kirby & Tantram (1999b); Lake (2010)
Trampling and wear		✓	✓	Heavy footfall can result in vegetation wear, soil compaction & erosion.	Lowen <i>et al.</i> (2008b); Lake (2010)
Interaction with predators	?		✓	Species such as Crows and Magpies may be drawn to areas with greater human activity or occur at higher densities; redistribution of birds may result in greater vulnerability to predation.	Marzluff & Neatherlin (2006)
Nutrient enrichment from dog fouling		✓	✓	Risks from dog fouling resulting in increased soil nutrient levels and changes in vegetation.	Bonner & Agnew (1983); Taylor <i>et al.</i> (2005); De Frenne <i>et al.</i> (2022)
Fly tipping/litter		?	✓	Short-term impacts to interest features likely to be minimal but risks of long-term contamination, particularly from introduced species from garden waste a risk. Also risks of staff time drawn from other essential duties.	
Contamination of water bodies from dogs		✓	✓	Dogs swimming in ponds and other waterbodies brings potential risks from increased turbidity and pollution from flea treatments etc	Groome <i>et al.</i> (2018); Denton & Groome (2017); Perkins <i>et al.</i> (2020)
Disruption of management		✓	✓	Disruption such as dog attacks to livestock; gates left open; theft of equipment/material; all issues to be expected at more urban sites or those with more recreation	

Impact	Exe Estuary SPA/Ramsar	Dawlish Warren SAC	East Devon Heaths SPA/SAC	Notes	References and examples
Public opposition/objection to management	✓	✓	✓	Management interventions such as tree or scrub removal, water level management etc. can be sensitive and opposed by local residents, leading to issues achieving the necessary management	Woods (2002)
Damage to infrastructure, vandalism etc.	✓	✓	✓	Direct damage can occur through graffiti and deliberate vandalism which tend to be issues at more urban sites	
Predation by pet cats			✓	Increased housing may lead to increases in local cat population; pet cats can range widely and predate a variety of bird and mammal species. Unlikely as a risk for Exe Estuary?	Hall <i>et al.</i> (2016);

Strategic mitigation

- 5.9 A strategic approach to mitigation has been in place since 2014. This strategic approach applies to residential and some tourist development within a zone of influence drawn around each European site and is applied consistently across Exeter City, East Devon and Teignbridge. Full details of the issues and mitigation measures are set out in the strategy (see the original 'South East Devon European Site Mitigation Strategy', Liley et al., 2014, as well as the emerging updated 'South East Devon Wildlife - Joint Habitat Sites Mitigation Strategy').
- 5.10 Mitigation has involved on-site measures such as rangers, management of parking and engagement with visitors on the respective sites (these measures are referred to as SAMM – Strategic Access Management and Monitoring) and the provision of alternative places for recreation use by local residents (SANG – Suitable Alternative Natural Greenspace).
- 5.11 The mitigation strategy is long running, well established and ensures mitigation can be delivered. It provides transparency for developers as the costs and mitigation requirements are known in advance. The strategy is clearly referenced and mitigation requirements for the Plan established in Policy NE3 while SANGs are also referenced in Policy NE2.
- 5.12 The strategy was revised and updated during 2023 and 2024 (in a joint commission by East Devon, Exeter City and Teignbridge District) with the new strategy set up to continue indefinitely with reviews and updated scheduled at five-year intervals. The new strategy will therefore cover the period 2025-2030 at which point it will be revised and updated as necessary. Key parties, including Natural England and stakeholders involved in the delivery of the strategy (such as the Pebblebed Heaths Conservation Trust) have been consulted and commented on early drafts.

Implications for the HRA

- 5.13 The mitigation strategy provides a robust and established means to deliver the mitigation and is in line with strategies in other parts of the country, for example the Thames Basin Heaths, the Dorset Heaths, the Solent Coast, the Suffolk Coast and the North Kent Coast. As such there can be confidence in the broad approach as a means to address impacts arising from the cumulative effects of development across a wide area. Natural England have reviewed the updated strategy and are supportive of the approach.
- 5.14 As such the strategy provides the means to rule out adverse effects on integrity, from the Exeter Plan alone and in-combination with other local plans and

development coming forward in the surrounding area. The strategy ensures the necessary SAMM and SANG are adequately resourced and deliverable and that the level of mitigation is sufficient to address the scale of growth coming forward. All local planning authorities that fall within the respective zones of influence are involved in the scheme.

Key findings: Recreation

A strategic mitigation approach with respect to Exe Estuary SPA/Ramsar, East Devon Heaths SAC/SPA and Dawlish Warren SAC is established and long running to address the impacts from housing and some tourist development within Exeter City, East Devon and Teignbridge Districts. This strategic mitigation approach has been updated and with the strategy in place it can be concluded that the necessary mitigation is resourced and deliverable and that the level of mitigation is sufficient to address the scale of growth coming forward. Adverse effects can be ruled out, alone or in-combination.

6. Appropriate assessment topic: Hydrological issues

Relevant policies from initial LSE screening

- 6.1 Likely significant effects were only identified with respect to the Exe Estuary SPA/Ramsar. The screening identified likely significant effects alone from the overall housing growth proposed in the plan, as set out in H1: Housing requirement and H2: Housing allocations.
- 6.2 Likely significant effects were also triggered in-combination for the individual allocations:
- SBA1: Water Lane – Site reference 15
 - SBA2: East Gate – Site reference 145
 - SBA3: Red Cow – Site reference 146
 - SBA4: Exe Bridges Retail Park – Site reference 142
 - SBA5: South Gate – Site reference 46

Introduction

- 6.3 Run-off outflow from sewage treatments and overflows from septic tanks can result in increased nutrient loads and contamination of water courses. This can have consequences for European sites which contain wetland or aquatic features, as the pollution will affect the ability of the site to support the given interest.
- 6.4 Furthermore, abstraction and land management can influence water flow and quantity, resulting in reduced water availability at certain periods or changes in the flow. This can exacerbate issues relating to water quality.
- 6.5 These impact pathways can be specific to particular parts of European sites or particular development locations and are also relevant to the overall quantum of development.
- 6.6 The Environment Agency classification for the estuary under the Water Framework Directive in 2020 is 'Moderate' for both ecological and chemical parameters. Issues preventing waters reaching 'Good' status and the contributing sectors can be summarised under growth, development and transport.

- 6.7 The Site Improvement Plan²¹ for the Exe Estuary does not list water resources or water quality as an existing pressure or emerging threat. However, the conservation objectives²² include the following:
- ‘... to ensure that, subject to natural change, the ... supporting processes on which the habitat of the qualifying species rely [are maintained or restored as appropriate].
- 6.8 Furthermore, the supplementary advice for the waterbird assemblage (taken here as a reasonable surrogate for all other wetland features) adds that:
- ‘aqueous contaminants’ should be ‘reduced’,
 - ‘dissolved oxygen’ levels should be ‘maintained’,
 - ‘dissolved inorganic nitrogen levels’ should be ‘maintained’; and
 - that ‘natural levels of turbidity’ should be ‘maintained’.
- 6.9 The need to ‘reduce’ aqueous contaminants reflects the high levels of inorganic contaminants in the estuary. To ‘maintain’ existing levels of the other factors suggests these are of lesser concern, perhaps broadly reflecting the SIP. In contrast, no specific targets appear to be set out in terms of water resources.

Water supply

- 6.10 It is the role of the Environment Agency to make sure that abstraction is sustainable and does not damage the environment. Water abstraction is managed through a licensing system originally introduced by the Water Resources Act 1963.
- 6.11 The Environment Agency oversees the publication of River Basin Management Plans (RBMPs). These set the legally binding locally specific environmental objectives that underpin water regulation. They set out how the management of water bodies will be undertaken, the roles of relevant bodies and the steps undertaken to ensure environmental targets are met.

²¹ Natural England (2014). Site Improvement Plan. Exe Dawlish. V1.0.

²² Natural England (2022). Exe Estuary Supplementary advice (last updated 18th March 2022). Available at: <https://designatedsites.naturalengland.org.uk/Marine/SupAdvice.aspx?SiteCode=UK9010081&SiteName=exe+estuary&SiteNameDisplay=Exe+Estuary+SPA&countyCode=&responsiblePerson=&SeaArea=&IFCAArea=&NumMarineSeasonality=7> (accessed on 19 August 2022).

- 6.12 The most recent South West River Basin Management Plan was updated in 2022²³. The Plan commits the Environment Agency to assess all licence applications and only issue licences that adequately protect and improve the environment; where necessary each should be subject to an individual HRA. The Agency will only grant replacement licences where the abstraction is environmentally sustainable, and abstractors can demonstrate they have a continued need for the water, and it will be used efficiently. In addition, for existing licences, the Agency will prioritise actions to protect and improve European sites and address the most seriously damaging abstractions during this plan period. All abstractors in surface water and groundwater bodies where serious damage is occurring or could occur without action should expect that their licences will be constrained over the next 6 years. The South West River Basin Management Plan was subject to HRA²⁴ which determined that the RBMP was not likely to have any significant effects on any European sites, alone or in combination with other plans or projects
- 6.13 The Water Act 2003 introduced a legal requirement into the Water Industry Act 1991 for water companies to prepare, publish and maintain Water Resources Management Plans (WRMPs). South West Water's most recent WRMP (WRMP24, draft from October 2023²⁵) predicts demand for water and identifies issues around supply. The Exeter area is supplied with domestic water from the Wimbleball Water Resource Zone (WRZ) which extends across much of east Devon. Wimbleball Reservoir is located in the headwaters of the River Exe. Forecasts are made based on population forecasts from the Office of National Statistics and property forecasts from local plans. The WRMP used water supply and demand forecasts, together with climate change and target headroom values to forecast baseline supply demand for a 25 year period, to 2050. This shows that, without any interventions the Wimbleball WRZ is in immediate risk of deficit.
- 6.14 In order to close the deficit the draft WRMP includes measures to incorporate smart meters and networks, address leakage, increase water efficiency and draw on new water supplies. The draft WRMP24 has been subject to HRA²⁶ which

²³ <https://www.gov.uk/guidance/south-west-river-basin-district-river-basin-management-plan-updated-2022>

²⁴

https://assets.publishing.service.gov.uk/media/635246fae90e07768c1a73a2/South_west_river_basin_management_plan_2022_HRA.pdf

²⁵ <https://www.southwestwater.co.uk/about-us/what-we-do/improving-your-service/water-resources-management-plan>.

²⁶ Dated December 2023. See <https://www.southwestwater.co.uk/siteassets/documents/about-us/wrmp/revised-wrmp/sww-dwrmp24-appendix-7-sea-report-dec23-annex-h-hra.pdf>

screened all relevant measures, including supply and drought options and included appropriate assessment for those where likely significant effects were identified. The HRA concludes that South West Water will be able to ascertain beyond reasonable scientific doubt that the proposed updated WRMP24 will not adversely affect the integrity of any European site, alone or in-combination with other plans or projects.

- 6.15 As the water company and Environment Agency represent the most suitable competent authorities to assess the WRMP24, once produced its findings can and should be adopted by Exeter City Council with respect to the Exeter Local Plan HRA. While the final WRMP24 has not been published, the draft plan and accompanying HRA provide sufficient confidence and are sufficiently advanced to allow adverse effects on integrity to be ruled out, alone or in combination, in relation to water resources. Exeter City Council should continue to engage with South West Water and the Environment Agency regarding water resources.
- 6.16 Given the potential deficit (in the absence of interventions) predicted for the Wimbleball Water Resource Zone, it is reasonable and appropriate for Policy CC9 in the Local Plan to emphasise the need for future development to incorporate water-saving measures, in accordance with South West Water advice. Policy CC9 states that all new residential development must achieve as a minimum water efficiency that requires an estimated water use of no more than 110 litres per day.

Water quality

- 6.17 Wastewater or sewage can be very damaging to water bodies as it can contain large amounts of nutrients (such as phosphorus and nitrates), ammonia, bacteria, harmful chemicals and other damaging substances. Issues arise where sewage treatment technology to adequately reduce levels of phosphorus and harmful chemicals is not in place, where leakages occur from privately owned septic tanks and, in wet weather, storm overflows can discharge untreated sewage.
- 6.18 Outcomes can include increased turbidity, algal blooms, reduced dissolved oxygen and an overall increase in the nutrient status of receiving waterbodies. Pollutants that access watercourses via household drains (e.g. pet flea treatments, Perkins *et al.*, 2020) can build up and be harmful to aquatic life. Simply, increases in housing increase pressure on the sewage network, the volume of wastewater and the levels of chemicals.
- 6.19 The pollution of inland and coastal waters has received greater recognition in recent years and the significance of such potential impacts and the need to mitigate has been given emphasis by Natural England's demands that new

development affecting vulnerable water bodies must achieve ‘nutrient neutrality’, i.e. avoid any net increase in nitrate and phosphate pollution. Whilst this relates primarily to the disposal of foul water, run-off from hard surfaces can also be a factor. This reflects contemporary case law (the Dutch case) which makes clear that where water quality targets of European sites are not being met, further inputs of pollutants should not be allowed.

- 6.20 For the avoidance of doubt, the Exe Estuary is not currently subject to these measures, but a range of other statutory and policy drivers still apply.
- 6.21 River Basin Management Plans provide the framework for protecting and enhancing the water environment. The relevant plan for the South West²⁷ sets out statutory objectives for protected areas and a programme of measures to achieve those objectives.
- 6.22 South West Water provides wastewater treatment for new development which it typically delivers by ensuring there is adequate capacity or headroom within the wastewater treatment system.
- 6.23 Whilst it should be expected that all existing wastewater treatment works that lie within the catchment of the Exe Estuary operate within their licensed conditions and that all have capacity to accommodate predicted levels of growth, this is not known to the Council for certain and there is some evidence in the public domain they are not. On the other hand, licenses for all wastewater treatment works and any changes to these would have been subjected to project-level HRAs and would not be permitted to operate if adverse effects could not be ruled out.
- 6.24 The basis for integrated long-term planning relating to drainage, flooding and protection of the environment is provided by Drainage and Wastewater Management Plan (DWMP). The DWMP and its environmental assessments will inform the content and direction and so be of direct relevance to the evolution of the Local Plan and this HRA.
- 6.25 In May 2023 South West Water published its first DWMP (DWMP24)²⁸ covering the period from 2025 to 2050 with an accompanying HRA²⁹. The HRA assessed four options and concluded that of the 661 Level 3 catchments, 493 required

²⁷ See [Environment Agency website](#)

²⁸ South West Water (2023). Drainage and Wastewater Management Plan. Our Regional Plan.

²⁹ Pennon (2023). Drainage and Wastewater Management Plan. HRA Stage 1 screening and Stage 2 Appropriate Assessment. May 2023.

appropriate assessment. However, with suitable mitigation adverse effects on the integrity of all European sites in the area were ruled out.

- 6.26 Given their particular knowledge of the water environment, South West Water/Environment Agency are the competent authorities best placed to assess the impact of the disposal and the subsequent management of foul water, not the Council. Therefore, there is no reason to doubt the outcome of the DWMP24 HRA and it is safe for the Council to rely on its findings. However, the Council can and should work closely with South West Water and all other partners to help ensure that measures within the DWMP24 are delivered.

Key findings: Hydrological issues

The outcome of the WRMP and DWMP and their respective HRAs indicate that adverse effects can be ruled out alone or in combination for the Exe Estuary SPA/Ramsar with respect to hydrological issues. Exeter City Council can rely on the HRAs for these plans and adopt the conclusions with respect to this Local Plan HRA.

7. Formal Integrity Test and Conclusions

- 7.1 The Exeter Plan at Publication Stage (Regulation 19) has been subjected to an appropriate assessment and integrity test according to the statutory provisions laid out in the Habitat Regulations 2017 as amended. The outcomes allow the following conclusions to be drawn:
- 7.2 Likely significant effects were identified with respect to the following pathways and European sites:
- General Urban Effects: Exe Estuary SPA/Ramsar
 - Recreation: Exe Estuary SPA/Ramsar, East Devon Heaths SAC/SPA and Dawlish Warren SAC
 - Hydrological Effects: Exe Estuary SPA/Ramsar
- 7.3 Drawing on the findings from the appropriate assessment and in light of the conservation objectives for the above European sites, adverse effects on integrity for all European sites can be ruled out, alone or in-combination.
- 7.4 As the Plan-making process proceeds, there will be a formal representation period and examination. The Plan may well be subject to modification prior to adoption and any changes to the Plan should be accompanied by additional HRA work and updates to the HRA.

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Appendix 1: Conservation Objectives

- 7.6 As required by the Directives, 'Conservation Objectives' have been established by Natural England, which should define the required ecologically robust state for each European site interest feature. All sites should be meeting their conservation objectives. When being fully met, each site will be adequately contributing to the overall favourable conservation status of the species or habitat interest feature across its natural range. Where conservation objectives are not being met at a site level, and the interest feature is therefore not contributing to overall favourable conservation status of the species or habitat, plans should be in place for adequate restoration.
- 7.7 In 2012, Natural England issued a set of generic European site Conservation Objectives, which should be applied to each interest feature of each European site. The list of generic Conservation Objectives for each European site includes an overarching objective, followed by a list of attributes that are essential for the achievement of the overarching objective. Whilst the generic objectives are standardised, they are to be applied to each interest feature of each European site, and the application and achievement of those objectives will therefore be site specific and dependant on the nature and characteristics of the site.
- 7.8 For SPAs, the overarching objective is to:
- 'Avoid the deterioration of the habitats of qualifying features, and the significant disturbance of the qualifying features, ensuring the integrity of the site is maintained and the site makes a full contribution to achieving the aims of the Birds Directive.'*
- 7.9 This is achieved by, subject to natural change, maintaining and 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 populations of the qualifying features.
 - The distribution of the qualifying features within the site.
- 7.10 For SACs, the overarching objective is to:
- 'Avoid the deterioration of the qualifying natural habitats and the habitats of qualifying species, and the significant disturbance of those qualifying species, ensuring the*

integrity of the site is maintained and the site makes a full contribution to achieving Favourable Conservation Status of each of the qualifying features.'

- 7.11 This is achieved by, subject to natural change, maintaining and restoring:
- The extent and distribution of the qualifying natural habitats and habitats of qualifying species.
 - The structure and function (including typical species) of qualifying natural habitats and habitats of qualifying species.
 - The supporting processes on which qualifying natural habitats and habitats of qualifying species rely.
 - The populations of qualifying species.
 - The distribution of qualifying species within the site.
- 7.12 Conservation objectives inform any HRA of a plan or project, by identifying what the interest features for the site should be achieving, and what impacts may be significant for the site in terms of undermining the site's ability to meet its conservation objectives. Site specific supplementary advice highlights the importance of typical species, processes or ecological characteristics that are critical to the interest features of the site. Within the supplementary advice these are normally referred to as 'attributes' and can refer to a range of ecological characteristics such as population number, extent of habitat or a supporting process such as hydrology. Each attribute has a 'target' for the required condition of the attribute.
- 7.13 In Appendix 2 the hyper-links cross reference to the relevant conservation objectives page (on the Natural England website) for all the relevant European sites.

Appendix 2: Summary of European Sites

Summary of European sites and their interest features. Links in the site column relate to the conservation objectives for each site or (in the case of the Ramsar sites) the relevant page with the information sheet on the Natural England website. # in the interest features column denotes an interest feature for which the UK has a special responsibility. Descriptions are drawn from the description in the relevant site improvement plans.

Site	Interest features	Description
East Devon Pebblebed Heaths SAC	H4030 European dry heaths S1044 <i>Coenagrion mercuriale</i> : Southern damselfly H4010 Northern Atlantic wet heaths with <i>Erica tetralix</i>	The East Devon Pebblebed Heaths is the largest block of lowland heath in Devon, and it is internationally important for its Northern Atlantic wet heaths and extensive areas of lowland European dry heaths. The diversity of heathland reflects the varied topography, geology, hydrology and water chemistry of the area, and supports associated plant and animal communities. Among the 21 breeding dragonfly species recorded at the site is the southern damselfly, an Annex II species.
East Devon Heaths SPA	A302(B) <i>Sylvia undata</i> : Dartford warbler A224(B) <i>Caprimulgus europaeus</i> : European nightjar	The East Devon Pebblebed Heaths is the largest block of lowland heath in Devon. There is an important assemblage of birds, and breeding European nightjar and Dartford warbler afford the site SPA status.
Dawlish Warren SAC	H2190 Humid dune slacks S1395 <i>Petalophyllum ralfsii</i> : Petalwort H2120 Shifting dunes along the shoreline with <i>Ammophila arenaria</i> ("white dunes") H2130# Fixed dunes with herbaceous vegetation ("grey dunes")	Dawlish Warren is a geomorphologically important sand spit which protects the mouth of the Exe estuary. Herb-rich neutral grassland hosts the only mainland population of the Warren sand crocus. A mosaic of reed bed, marsh, scrub and open water support several nationally rare plants.
Exe Estuary SPA	A141(NB) <i>Pluvialis squatarola</i> : Grey plover A046a(NB) <i>Branta bernicla bernicla</i> : Dark-bellied brent goose A132(NB) <i>Recurvirostra avosetta</i> : Pied avocet A156(NB) <i>Limosa limosa islandica</i> : Black-tailed godwit Waterbird assemblage A149(NB) <i>Calidris alpina alpina</i> : Dunlin	The Exe estuary is of international importance for wintering and migratory wetland birds. It is also of national importance for its marine life, especially that associated with intertidal sand and mud flats. Dawlish Warren is a geomorphologically important sand spit which protects the mouth of the Exe estuary. Salt marsh in the lee of the spit is an important habitat and provides a winter roost for

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Site	Interest features	Description
	A007(NB) <i>Podiceps auritus</i> Slavonian grebe A130(NB) <i>Haematopus ostralegus</i> : Eurasian oystercatcher	wildfowl and waders, particularly dark-bellied Brent geese and oystercatcher.
Exe Estuary Ramsar	Waterfowl assemblage of international importance (under criterion 5) Species/populations occurring at levels of international importance (under criterion 6): <i>Branta bernicla bernicla</i> : Dark-bellied brent goose	As above.
Lyme Bay & Torbay SAC	H1170 Reefs H8330 Submerged or partially submerged sea caves	The two sections of the Lyme Bay and Torbay SAC off the Devon coast of England contain a greater diversity of habitats than found in other existing SACs in the Western English Channel and Celtic Sea. Within the Lyme Bay Reefs portion, bedrock and stony reef, boulders and cobble and sediments comprise a type of reef uncommon in the region. This complex and diverse reef habitat supports particularly high species richness. Hydroids, anemones, sea squirts, sponges and corals populate the area to the extent the area has been identified as a marine biodiversity 'hotspot.' The pink sea fan and the nationally rare southern cup coral is found throughout the site. The diverse geology of the 'Mackerel Cove to Dartmouth Reefs' in Torbay, limestone reefs and outcrops, sandstone, slate reef, granite outcrops, and stony reef, supports a similarly rich assemblage of animal communities, including an extensive coverage of kelp and blue mussel communities on shallower reefs, and species of sponge, anemone, soft corals and crustaceans on the deeper reefs. The area also contains a diversity of wave-eroded sea caves at Babbacombe to Hopes Nose and Broad Sands to Berry Head. The freshwater and saltwater mix in these caves makes them some of the best examples of coastal solution caves in the UK. The caves also support a richness of animal life including many nationally significant species such as sponges, pink sea fingers, burrowing anemones and southern cup coral.

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Site	Interest features	Description
Sidmouth to West Bay SAC	H1210 Annual vegetation of drift lines H1230 Vegetated sea cliffs of the Atlantic and Baltic coasts H9180# <i>Tilio-Acerion</i> forests of slopes, screes and ravines	Sidmouth to West Bay is an example of a highly unstable soft cliff coastline subject to mudslides and landslips. The principal rock types are soft mudstones, clays and silty limestones, with a small chalk outlier in the west. Vegetation is very varied and includes pioneer communities on recent slips, calcareous grassland and scrub on detached chalk blocks, and extensive self-sown woodland dominated by ash <i>Fraxinus excelsior</i> or sycamore <i>Acer pseudoplatanus</i> . This mosaic of habitats makes this site rich in invertebrates, especially bees and wasps. The Red Data Book lichen <i>Parmelia quercina</i> occurs on ash <i>Fraxinus excelsior</i> trees.
South Dartmoor Woods SAC	H4030 European dry heaths H91A0 Old sessile oak woods with <i>Ilex</i> and <i>Blechnum</i> in the British Isles	The SAC consists of fine examples of old sessile oak woods, some of the best remaining in South Devon. The SAC forms a complex mosaic of woodland, grassland and heathland, with rare lichen species and nationally rare species of Pearl Border Fritillary and High Brown Fritillary.
South Hams SAC	H8310 Caves not open to the public H6210# Semi-natural dry grasslands and scrubland facies: on calcareous substrates (<i>Festuco-Brometalia</i>) H4030 European dry heaths H1230 Vegetated sea cliffs of the Atlantic and Baltic coasts H9180# <i>Tilio-Acerion</i> forests of slopes, screes and ravines S1304 <i>Rhinolophus ferrumequinum</i> : Greater Horseshoe Bat	The South Hams SAC is comprised of several but separate component SSSIs. The SAC is thought to hold the largest population of Greater horseshoe bat in the UK and is the only one containing more than 1,000 adult bats. It contains the largest known maternity roost in the UK and possibly Europe. The site contains both maternity and hibernation sites. Many of the roosts are within caves not open to the public. The SAC is important for its extensive limestone grassland, some areas on the plateau support European dry heath characteristic of acid soil. The limestone headland cliffs of Torbay support calcareous grassland and scrubland facies. The site is exceptional in that it supports a number of rare and scarce vascular plants typical of the oceanic southern temperate and Mediterranean-Atlantic elements of the British flora. The SAC also supports areas of <i>Tilio-Acerion</i> ravine forest which is woodland containing ash, wych elm and small leaved lime and field maple.

Appendix 3: Site pressures and threats for relevant European sites

The table lists the threats and pressures identified for each European site in the relevant site improvement plan. The links are for the relevant plan and the threats/pressures are listed in prioritised order.

Site	Site pressures and threats
East Devon Pebblebed Heaths SAC/SPA	1 Inappropriate scrub control 2 Undergrazing 3 Change in land management 4 Public access/disturbance 5 Air pollution: impact of atmospheric nitrogen deposition 6 Water pollution 7 Hydrological changes
Exe Estuary SPA and Dawlish Warren SAC	1 Public access/disturbance (affecting birds) 2 Changes in species distributions 3 Coastal squeeze 4 Change in land management 5 Public access/disturbance (visitor pressure at Dawlish Warren) 6 Fisheries: Commercial marine and estuarine
Lyme Bay & Torbay SAC	1 & 2 Fisheries: commercial marine and estuarine 3 Public access/disturbance
Sidmouth to West Bay SAC	1 Invasive species 2 Disease 3 Direct impact from third party 4 Planning permission: general 5 Water pollution 6 Vehicles 7 Habitat fragmentation 8 Inappropriate coastal management 9 Air pollution: risk of atmospheric nitrogen deposition

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Site	Site pressures and threats
South Dartmoor Woods SAC	1 Air pollution: impact of atmospheric nitrogen deposition
South Hams SAC	1 Change in land management 2 Planning permission: general 3 Physical modification 4 Inappropriate vegetation management 5 & 7 Public access/disturbance 6 Forestry and woodland management 8 Inappropriate scrub control 9 Air pollution: impact of atmospheric nitrogen deposition

Appendix 4: Screening for likely significant effects

The table below sets out the screening of the entire plan (Regulation 19 version) for likely significant effects ('LSE'). Orange shaded rows with bold text indicates policies that are screened in alone or in-combination. Grey shading/italicised text indicates introductory text and chapter headings, and therefore differentiates chapters/sections of the Plan.

Plan section/policy	Description	Screening conclusion	Potential risks	Comments
<i>1 Explaining the Exeter Plan</i>	<i>Initial text setting context and introduction.</i>	<i>Introductory text. No LSE.</i>		
<i>2 Exeter: Ancient City – ambitious future</i>	<i>Spatial portrait of the city.</i>	<i>Strategic text. No LSE.</i>		
<i>3 This is our city, this is our future</i>	<i>Overarching vision.</i>	<i>Strategic text. No LSE.</i>		
<i>4 Spatial strategy</i>	<i>Introductory text on spatial strategy.</i>	<i>Introductory text. No LSE.</i>		
S1: Spatial strategy	Sets out the main principles for guiding the pattern and characteristics of development in the city.	Strategic text. No LSE.		Very strategic with no quantum of growth set or specific locations.
S2: Liveable Exeter Principles	Strategic policy with broad principles for large scale developments.	General statements. No LSE.		Overarching principles and requirements
<i>5 Climate change</i>	<i>Introductory text on climate emergency.</i>	<i>Introductory text. No LSE.</i>		
CC1: Net zero Exeter	Lists a range of criteria to ensure development proposals support the achievement of net zero.	General Policy that will not lead to development. No LSE.		Policy provides links to green infrastructure, biodiversity net gain and landscape schemes which are likely to be generally positive with respect to biodiversity.

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Plan section/policy	Description	Screening conclusion	Potential risks	Comments
CC2: Renewable and low carbon energy	Broad policies stating that renewable and low carbon developments are favourable.	General Policy that will not lead to development. No LSE.		
CC3: Local energy networks	Identifies locations for local energy networks and criteria for new development in the vicinity of such networks.	General Policy that will not lead to development. No LSE.		
CC4: Ground-mounted photovoltaic arrays	Sets criteria for choosing locations to place ground-mounted photovoltaic arrays.	General Policy that will not lead to development. No LSE.		Policy linked to green energy, with general criteria to avoid adverse effects to European sites. Policy screened out as locations are not specified and criteria is very general (and therefore not an avoidance/mitigation proposal).
CC5: Future development standards	General policy around carbon emissions in development.	General Policy that will not lead to development. No LSE.		
CC6: Embodied carbon	Broad policy that aims to reduce carbon emissions in major developments.	General Policy that will not lead to development. No LSE.		
CC7: Development that is adaptive and resilient to climate change	Sets general aspirations for developments to demonstrate how they will be adaptive to a changing climate.	General Policy that will not lead to development. No LSE.		

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Plan section/policy	Description	Screening conclusion	Potential risks	Comments
CC8: Flood risk	Sets general criteria relating to flood risk.	General Policy that will not lead to development. No LSE.		
CC9: Water quantity and quality	General policy that promotes water use efficiency and improved ecological status of Exeter's water bodies by residential developments.	General Policy that will not lead to development. No LSE.		Policy screened out as it does not relate to a specific European site or specific mitigation for the estuary. Policy nonetheless potentially ensures some incidental protection to the Exe Estuary in relation to contamination from surface water/flooding and requirement for all new residential development to achieve water efficiency targets.
6 Homes	<i>Introductory text for section on housing requirement and allocations.</i>	<i>Introductory text. No LSE.</i>		
H1: Housing requirement	Sets quantum of growth, targeting the delivery of at least 642 homes per year between 2021 and 2041. 13,975 homes proposed.	LSE. Screened in.	LSEs: Urban effects alone (Exe Estuary SPA/Ramsar); Recreation alone (Exe Estuary SPA/Ramsar, East Devon Heaths SAC/SPA, Dawlish Warren SAC, South Dartmoor Woods SAC); Hydrological impacts alone (Exe Estuary SPA/Ramsar).	Total includes 2,311 completions (2021-2024) and approximately 5,289 homes with existing planning consents. New homes anticipated are approximately 5,369 homes on allocated sites and 1,006 windfall.
H2: Housing allocations and windfalls	Lists development sites that are allocated.	LSE. Screened in.	LSEs: Urban effects alone (Exe Estuary SPA/Ramsar); Recreation alone (Exe Estuary SPA/Ramsar, East Devon Heaths SAC/SPA, Dawlish Warren SAC, South Dartmoor Woods SAC); Hydrological impacts alone (Exe Estuary SPA/Ramsar).	Overall amount of growth in H1 broken down across individual allocations. All allocations checked on maps/aerial imagery and some site visits undertaken to confirm no risks with respect to functionally-linked land.

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Plan section/policy	Description	Screening conclusion	Potential risks	Comments
H3: Regeneration opportunity areas	Strategic policy with aspirations for developments on brownfield land and includes locations where regeneration may occur within the urban boundary.	Policy listing general criteria. No LSE.		Policy identifies two locations for regeneration (Marsh Barton and North Gate) however is screened out as policy high level and no further details. One of the North Gate sites is included within Policy H2 as an allocation, otherwise these areas are not relied upon to deliver any of the housing requirement.
H4: Affordable homes	Sets the quantity of affordable housing required per housing development.	Policy listing general criteria. No LSE.		
H5: Build to rent	Sets the criteria for developments that are built specifically for rent, including some measures for affordable housing.	Policy listing general criteria. No LSE.		
H6: Co-living housing	Criteria for proposals of co-living developments.	Policy listing general criteria. No LSE.		
H7: Custom and self-build housing	Sets the general criteria for custom house building.	Policy listing general criteria. No LSE.		Policy does not give specific level of growth and therefore screened out.
H8: Homes for older people	General policy for the development of homes for older people.	Policy listing general criteria. No LSE.		
H9: Supported housing	General policy for developments that meet specialist needs.	Policy listing general criteria. No LSE.		

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Plan section/policy	Description	Screening conclusion	Potential risks	Comments
H10: Purpose built student accommodation	General policy for student accommodation developments.	Policy listing general criteria. No LSE.		Student accommodation may need specific HRA considerations with respect to recreation impacts, however policy is strategic without giving names of sites or any quantum of growth.
H11: Gypsy and traveller accommodation	Criteria for where support will be given for development proposals relating to Gypsy and Traveller pitches or plots for Travelling Showpeople.	Policy listing general criteria. No LSE.		Policy does not give any specific quantum of growth or allocations
H12: Residential conversions and houses in multiple occupation	Outlines the criteria for converting buildings to multiple occupancy.	Policy listing general criteria. No LSE.		
H13: Loss of residential accommodation	Development resulting in a net loss of residential dwellings will not be permitted.	General policy. No LSE.		
H14: Accessible homes	Policy stating the minimum requirement of accessible homes in new developments.	Policy listing general criteria. No LSE.		
H15: Housing density and size mix	Proposals will have appropriate housing density and size mix, as determined in the latest Local Housing Needs Assessment.	Policy listing general criteria. No LSE.		

Plan section/policy	Description	Screening conclusion	Potential risks	Comments
H16: Residential amenity and healthy homes	Factors for developments to take into account, proving safe and healthy living standards to residents.	Policy listing general criteria. No LSE.		
7 Economy and jobs	<i>Introductory text on employment and the economy.</i>	<i>Introductory text.</i> No LSE.		
EJ1: Economic growth	Strategic policy supporting development proposals where they meet the economic needs of the city.	Policy or proposal that could not have any conceivable impact on a site. No LSE.		
EJ2: Retention of employment land	Policy states that established employment areas will be retained for employment use and elsewhere alternative use may be considered where the site is allocated for mixed use redevelopment where regeneration would make more efficient use of the land or if employment use if not viable.	Policy or proposal that could not have any conceivable impact on a site. No LSE.		
EJ3: New forms of employment provision	General policy supporting development proposals for new forms of employment provision.	Policy or proposal that could not have any conceivable		

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Plan section/policy	Description	Screening conclusion	Potential risks	Comments
		impact on a site. No LSE.		
EJ4: Access to jobs and skills	General policy supporting access to jobs and skills.	Policy or proposal that could not have any conceivable impact on a site. No LSE.		
EJ5: Provision of local services in employment areas	Provision of local services in employment areas listed in Policy EJ2.	Policy or proposal that could not have any conceivable impact on a site. No LSE.		
EJ6: New transformational employment allocations	Three allocations for employment – with two at Newcourt and one close to the city centre.	Policy or proposal that could not have any conceivable impact on a site. No LSE.		All allocations over 1km from the Exe Estuary SPA/Ramsar.
<i>8 Retail and the future of our centres</i>	<i>Introductory text relating to high streets and retail.</i>	<i>Introductory text. No LSE.</i>		
RFC1: The future of our centres	General policy relating to local centres to preserve their vitality, viability and resilience.	Policy or proposal that could not have any conceivable impact on a site. No LSE.		

Plan section/policy	Description	Screening conclusion	Potential risks	Comments
RFC2: Development in and affecting our centres	General policy to support development for retail, within city and local centres.	Policy or proposal that could not have any conceivable impact on a site. No LSE.		
9 Sustainable transport and communications	<i>Introductory text on travel.</i>	<i>Introductory text. No LSE.</i>		
STC1: Sustainable movement	General policy ensuring/promoting active travel and sustainable transport options.	Policy or proposal that could not have any conceivable impact on a site. No LSE.		Policy wording (STC1g) includes reference to supporting opportunities for sustainable water-borne transport and protecting embarkation points. This could involve locations within the Exe Estuary SPA/Ramsar with implications for bird disturbance. However, the wording is too high level and broad brush to allow any kind of more detailed assessment. Umbrella protection is afforded through policy NE3.
STC2: The transport hierarchy	Policy sets out that new developments will need to make it easier for people to walk, cycle, use public transport, shared mobility and transition easily to more sustainable car use (e.g. electric).	General criteria for development proposals. No LSE.		

Plan section/policy	Description	Screening conclusion	Potential risks	Comments
STC3: Supporting active travel	Strategic policy that safeguards existing/future links to long distance strategic trails and identifies areas where improvements required or new cycle routes. In addition, criteria for all new developments to support active travel.	Policy or proposal that could not have any conceivable impact on a site. No LSE.		Policy does include support for extension of foot and cycle routes that connect to European sites – e.g. the Exe Estuary Trail and Exe Cycle Route. However, policy is very general and no specific details provided – there may be opportunities to link to wider GI and divert recreation use and equally specific proposals could result in localised increases in recreation use on or within European sites. Policy too general and high level to trigger any LSE and impacts assessed through policy H1 and other growth proposals.
STC4: Supporting public transport	Policy that improves the public transport network including enhanced bus routes and rail provision. Additionally, states the need for major developments to provide public transport provision.	Policy or proposal that could not have any conceivable impact on a site. No LSE.		
STC5: Supporting more sustainable forms of car use	General policy to reduce car use in the city. Policy states the need for safely accessible electric car charging points and promotion of active travel, public transport and shared mobility.	Policy or proposal that could not have any conceivable impact on a site. No LSE.		

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Plan section/policy	Description	Screening conclusion	Potential risks	Comments
STC6: Travel plans	Criteria for travel plans, which must accompany any major developments.	Policy or proposal that could not have any conceivable impact on a site. No LSE.		
STC7: Safeguarding transport infrastructure	Safeguarding of sites for future transport infrastructure.	Policy or proposal that could not have any conceivable impact on a site. No LSE.		Policy safeguards future sites but does not allocate them.
STC8: Motorway service area	Proposal that supports the redevelopment of the M5 service area.	General policy. No LSE.		
STC9: Digital communications	General policy requiring new major development to incorporate necessary digital infrastructure.	Policy or proposal that could not have any conceivable impact on a site. No LSE.		
<i>10 Natural environment</i>	<i>Introductory text on the environment and relevant policies.</i>	<i>Introductory text. No LSE.</i>		
NE1: Landscape setting areas	Policy protecting landscape, in terms of character, beauty and views.	General criteria for development proposals and environmental		

Plan section/policy	Description	Screening conclusion	Potential risks	Comments
		protection. No LSE.		
NE2: Valley Parks	General policy supporting and setting criteria for appropriate development within the Valley Parks.	Policy intended to avoid or reduce harmful effects to a European site. Screened in.	Screened in for further consideration at appropriate assessment in accordance with People vs Wind. Policy refers to Suitable Alternative Natural Greenspace and also the Riverside and Ludwell Parks Masterplan. As clear from the policy, these sites will function as mitigation to address recreation pressure on the European sites (East Devon Heaths SAC/SPA); Exe Estuary SPA/Ramsar; Dawlish Warren SAC).	Policy does not allocate the sites or specify scale of mitigation, so screened in on a precautionary basis.
NE3: Biodiversity	Plan-wide policy setting environmental protection (including designated sites), mitigation requirements and biodiversity net gain.	Policy intended to avoid or reduce harmful effects to a European site. Screened in.	Screened in for further consideration at appropriate assessment in accordance with People vs Wind. Policy refers to mitigation to address recreation pressure on the European sites (East Devon Heaths SAC/SPA); Exe Estuary SPA/Ramsar; Dawlish Warren SAC).	Screened in for further consideration as supporting text references the recreation mitigation strategy and need for mitigation for recreation (where relevant) indicated in policy.
NE4: Green infrastructure	Plan-wide policy protecting and enhancing green infrastructure.	Policy or proposal that could not have any conceivable impact on a site. No LSE.		Cross references to the Green Infrastructure Strategy. Not specific to mitigation and general green infrastructure policy, some cross-over and potential likely incidental benefits to European sites in terms of protection from recreation impacts.
NE5: Green Circle	Policy protecting green infrastructure.	Policy or proposal that could not have any conceivable		

Plan section/policy	Description	Screening conclusion	Potential risks	Comments
		impact on a site. No LSE.		
NE6: Urban greening factor	New developments must use UGF calculator to demonstrate urban greening.	Policy or proposal that could not have any conceivable impact on a site. No LSE.		
NE7: Urban tree canopy cover	Policy promotes tree cover in new developments.	Policy or proposal that could not have any conceivable impact on a site. No LSE.		
<i>11 History and heritage</i>	<i>General introduction on history and heritage.</i>	<i>Introductory text. No LSE.</i>		
HH1: Conserving and enhancing heritage assets	Policy to protect and enhance the city's heritage assets and includes the responsibility of development proposals to improve access and interpretation of the historic environment.	General criteria for development proposals. No LSE.		
HH2: Conservation areas	Policy requires development to conserve the distinctive character, special architectural value	General criteria for development proposals. No LSE.		

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Plan section/policy	Description	Screening conclusion	Potential risks	Comments
	and historic significance of Conservation Areas.			
HH3: Archaeology	Policy to protect archaeological assets, stating that development will not cause harm to such assets and will only be permitted if the benefits outweigh the impacts.	General criteria for development proposals. No LSE.		
HH4: Heritage assets and climate change	Developments will not be supported if they cause harm to heritage assets, unless addressing climate change outweighs the harm to the heritage asset.	General criteria for development proposals. No LSE.		
HH5: Conserving and enhancing Exeter City Walls	Policy recognises the historic importance of Exeter's City Wall's and development proposals should protect or enhance them, not cause harm.	General criteria for development proposals. No LSE.		
<i>12 Culture and tourism</i>	<i>General introduction relating to culture and tourism.</i>	<i>Introductory text. No LSE.</i>		
C1: Protecting and enhancing cultural and tourism facilities	General policy protecting and enhancing cultural and tourism facilities.	General criteria for development proposals. No LSE.		

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Plan section/policy	Description	Screening conclusion	Potential risks	Comments
C2: Development and cultural provision	Large scale developments should be sensitive to and contribute to local culture.	General criteria for development proposals. No LSE.		
13 High quality places and design	<i>Introductory text relating to general design principles and development quality.</i>	<i>Introductory text. No LSE.</i>		
D1: Design principles	Policy listing principles which will promote high quality design in development.	General criteria for development proposals. No LSE.		
D2: Designing-out crime	Policy listing general criteria to demonstrate a safe environment and discourage crime.	General criteria for development proposals. No LSE.		
D3: Advertisements	Advertisements should consider local amenities and public safety using the factors outlined in this policy.	Policy or proposal that could not have any conceivable impact on a site. No LSE.		
14 Health and wellbeing	<i>Introductory text on health and wellbeing, covering quality housing, job creation, increases in physical activity, enhancing nature etc.</i>	<i>Introductory text. No LSE.</i>		
HW1: Health and wellbeing	General policy maximising opportunities for achieving positive mental and physical health outcomes.	General criteria for development proposals. No LSE.		

Plan section/policy	Description	Screening conclusion	Potential risks	Comments
HW2: Environmental quality, pollution and contaminated land	General policy that requires the development to minimise the impact on local environmental quality.	General criteria for development proposals. No LSE.		Discusses (not specifically) the use of mitigation, remediation and monitoring strategies to reduce impacts on air quality, noise levels, surface and ground water quality and land/soil condition.
<i>15 Infrastructure and facilities</i>	<i>General introduction covering infrastructure and community facilities.</i>	<i>Introductory text. No LSE.</i>		
IF1: Delivery of infrastructure	General policy relating to infrastructure delivery, CIL/S106 payments and need for Infrastructure Delivery Plans.	Policy or proposal that could not have any conceivable impact on a site. No LSE.		
IF2: Viability	General policy covering viability.	Policy or proposal that could not have any conceivable impact on a site. No LSE.		
IF3: Community facilities	General policy relating to protecting existing community facilities and the support of proposals for new or improved facilities.	Policy or proposal that could not have any conceivable impact on a site. No LSE.		
IF4: Open space, play areas,	Protection of existing open spaces (e.g. sports pitches, play areas, green space and	Policy listing general criteria. No LSE.		

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Plan section/policy	Description	Screening conclusion	Potential risks	Comments
allotments and sport	allotments) and outlines the qualifying factors for new open spaces, which will be required or provided for by every new residential development.			
IF5: New cemetery provision	Outlines the factors with which proposals for a new cemetery would be supported.	General criteria for development proposals. No LSE.		
<i>16 Site allocations</i>	<i>Introductory text for individual sites.</i>	<i>Introductory text. No LSE.</i>		
SBA1: Water Lane – Site reference 15	Allocation. 36.2 ha allocated for a mixed-use development, 1,861 homes.	LSE. Screened in.	LSE: Recreation in-combination (Exe Estuary SPA/Ramsar; East Devon Heath SAC/SPA; South Dartmoor Woods SAC); Hydrological impacts in-combination (Exe Estuary SPA/Ramsar).	1.4km from Exe Estuary SPA/Ramsar. Site is virtually all brownfield so no credible risks in relation to loss of functionally-linked land or general urban effects. Policy includes specific requirement for mitigation in relation to recreation impacts.
SBA2: East Gate – Site reference 145	Allocation. 6.1 ha allocated for mixed-use development, 609 homes.	LSE. Screened in.	Recreation in-combination (Exe Estuary SPA/Ramsar; East Devon Heath SAC/SPA; South Dartmoor Woods SAC); Hydrological impacts in-combination (Exe Estuary SPA/Ramsar).	3.5km from Exe Estuary SPA/Ramsar. Brownfield site in centre, so no credible risks in relation to loss of functionally-linked land or general urban effects. Policy includes specific requirement for mitigation in relation to recreation impacts.
SBA3: Red Cow – Site reference 146	Allocation. 3.8ha allocated for residential	LSE. Screened in.	Recreation in-combination (Exe Estuary SPA/Ramsar; East Devon Heath SAC/SPA; South Dartmoor Woods SAC); Hydrological	Brownfield site, well to the north of the Exe Estuary SPA/Ramsar (4.6km) so no credible risks in relation to loss

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Plan section/policy	Description	Screening conclusion	Potential risks	Comments
	primarily, but mixed-use development, 442 homes.		impacts in-combination (Exe Estuary SPA/Ramsar).	of functionally-linked land or general urban effects. Policy includes specific requirement for mitigation in relation to recreation impacts.
SBA4: Exe Bridges Retail Park – Site reference 142	Allocation. 1.8ha allocated for mixed-use development, delivering 201 homes.	LSE. Screened in.	Recreation in-combination (Exe Estuary SPA/Ramsar, East Devon Heaths SAC/SPA, South Dartmoor Woods SAC); Hydrological impacts in-combination (Exe Estuary SPA/Ramsar).	Brownfield site, 3.5km from Exe Estuary SPA/Ramsar. No potential for loss of functionally-linked land. Policy includes specific requirement for mitigation in relation to recreation impacts.
SBA5: South Gate – Site reference 46	Allocation. 1.5ha allocated for primarily residential but a mixed-use development, provision of 81 homes.	LSE. Screened in.	Recreation in-combination (Exe Estuary SPA/Ramsar; East Devon Heaths SAC/SPA; South Dartmoor Woods SAC); Hydrological impacts in-combination (Exe Estuary SPA/Ramsar).	Largely brownfield site (car park) 3.3km from Exe Estuary SPA/Ramsar. No credible risks in relation to loss of functionally-linked land or general urban effects. Policy includes specific requirement for mitigation in relation to recreation impacts.
TI1: Topsham infrastructure Delivery Framework	Policy commits the City Council to work together with East Devon District Council on a framework to address development and infrastructure issues.	General policy with no conceivable impact for a European site. No LSE.		Plan includes 4 allocations within the Topsham area. These are assessed as part of H2. This policy does not set any quantum of growth or specific locations and is focussed on ensuring joined up infrastructure provision.
17 Monitoring and implementation				

Appendix 5: Summary of distances from allocations to European sites

The table below summarises the distances (km) from the closest part of each allocation to the closest point of each of the relevant European sites. Distances of under 500m are shown in red and grey shading indicate distances within 10km.

Allocation Name	Site Ref	No. dwellings	Distance (km) from allocation			
			Dawlish Warren SAC	East Devon Heaths SAC/SPA	Exe Estuary SPA/Ramsar	South Dartmoor Woods SAC
12-31 Sidwell Street	51	51	14.35	11.82	3.81	11.81
88 Honiton Road	110	10	12.73	9.02	2.93	14.4
91-97 Wonford Street	73	5	12.42	9.63	2.06	13.24
Belle Isle Depot	72	40	12.83	10.94	2.34	11.61
Chestnut Avenue	75	24	12	9.52	1.57	13.05
Clifford Close	63	33	13.5	9.65	3.55	14.23
East Gate	145	609	13.99	11.45	3.45	11.76
East of Pinn Lane	106	24	13.74	8.69	4.73	16.07
Exe Bridges Retail Park	142	201	13.87	12.17	3.48	10.63
Fever & Boutique, 12 Mary Arches Street	100	15	14.28	12.22	3.8	11.13
Garages at Lower Wear Road	84	12	10.49	8.75	0.18	13.12
Gypsy Hill Hotel	165	28	13.46	8.4	4.58	16.1
Heavitree Road police station	52	350	13.78	11.12	3.25	12.24
Hessary, Hollow Lane	108	17	13.43	8.73	4.22	15.61
Lancelot Road	31	7	14.86	10.8	4.72	14.24
Land adjacent Ikea, Newcourt	136	-	10.88	7.92	1.44	14.05
Land adjacent to Sandy Park, Newcourt	140	-	10.81	7.34	1.78	14.87
Land adjoining Silverlands	18	67	11.58	11.25	2.08	10.33
Land and Buildings at Victoria Street	150	47	14.73	11.72	4.21	12.44
Land at Exeter Squash Club, Prince of Wales Road	26	48	15.11	12.31	4.57	12.02

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Allocation Name	Site Ref	No. dwellings	Distance (km) from allocation			
			Dawlish Warren SAC	East Devon Heaths SAC/SPA	Exe Estuary SPA/Ramsar	South Dartmoor Woods SAC
Land at Hamlin Lane	60	13	13.97	10.45	3.71	13.66
Land at Matford Lane (2)	158	21	13.11	10.96	2.58	11.85
Land at Newcourt Road, Topsham	91	69	9.71	7.04	0.8	14.79
Land at Old Rydon Lane	89	357	10.09	7.2	1.15	14.84
Land at Taunton Close	13	5	13.24	12.11	3.08	10.25
Land at Topsham Golf Academy	95	54	9.09	6.95	0.23	14.63
Land behind 66 Chudleigh Road	125	27	11.73	11.39	2.17	10.34
Land rear of Beacon Lane shops	30	6	14.75	10.84	4.55	14.02
Land south of Gypsy Hill Lane	107	14	13.39	8.37	4.54	16.12
Land to the east of Newcourt Road (2), Topsham	153	45	9.44	6.89	0.67	14.84
Land to the west of Newcourt Road, Topsham	94	56	9.2	6.89	0.5	14.74
Mary Arches multi-storey and surface car park	163	154	14.31	12.23	3.83	11.11
Newbery Car Breakers	129	8	15.89	14.38	5.66	9.39
Red Cow/St Davids	146	442	15.1	12.99	4.64	10.81
Rougemont Switching Centre	151	86	14.68	12.31	4.16	11.33
South Gate	46	81	13.74	11.66	3.25	11.29
St Bridget Nurseries	83	350	10.69	7.85	1.01	13.75
St Lukes Campus, Heavitree Road	141	-	13.53	10.95	3	12.2
Unit 1 nightclub, Summerland Street	160	28	14.3	11.62	3.76	12.15
Water Lane	15	1,861	11.77	10.38	1.37	10.89
Whipton Community Hospital	64	110	13.63	9.36	3.89	14.77