

Proposed Redevelopment at:
Greenmoorside Farm
Seascale
Cumbria
CA20 1DS

Habitat Regulations Assessment:
Screening Report

AVISON YOUNG

FINAL

VERSION 2

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Executive Summary

Demolition of a cluster of agricultural buildings (the 'site') located at Greenmoorside Farm, Seascale, Cumbria, CA20 1DS is proposed.

Within 10km of the proposed development site there are three (non-marine) Natura 2000 sites: Morecambe Bay and Duddon Estuary Special Protection Area, Drigg Coast Special Area of Conservation (SAC) and River Ehen SAC. Due to the proximity of the site to these Natura 2000 sites, and following request from Cumberland Council, a bespoke Habitats Regulations Assessment (HRA) screening assessment has been completed.

The HRA was informed by the Report to inform a Habitat Regulations Assessment prepared in support of the Copeland Borough Council Publication Draft Local Plan and Addendum 2022, which identified several potential impact pathways affecting Natura 2000 sites within the plan area. These potential pathways were reviewed in relation to the proposed works, with those for which no credible source-pathway-receptor linkage was identified screened out. Changes to water quality and non-recreational disturbance were taken forward for further site-specific assessment as a part of the Stage 1 Screening.

This screening assessment has concluded that no significant effects are likely to occur to the Natural 2000 sites as a result of the proposed works, either alone or in combination with other developments.

1. Habitats Regulations Assessment

This section describes the background to the designation of Natura 2000 sites and outlines the HRA procedure.

1.1. Natura 2000 Sites

In 1992, member states of the European Union (EU) adopted legislation designed to protect the most seriously threatened habitats and species across Europe. This legislation is referred to as the Habitats Directive¹ and complements the Birds Directive (adopted in 1979)². The basis of both these Directives is the creation of a network of protected sites, collectively called Natura 2000 sites (also referred to as 'European sites').

Natura 2000 sites are either SPAs or Special Areas of Conservation (SACs). The Natura 2000 network is a European network of protected sites which represent the areas of highest value for natural habitats and species of plants and animals which are rare, endangered or vulnerable in the European Community. Sites which are being considered as potential SPAs (pSPAs) or candidate SACs (cSACs) are afforded the same protection as SPAs and SACs and should therefore also be considered in a HRA. However, no pSPAs or cSACs have been identified of relevance to this document (i.e. within the potential zone of impact of the proposed development).

Ramsar sites are designated as Wetlands of International Importance under the 1971 Ramsar Convention. Where any interest features of Ramsar sites overlap with those of European sites, the same considerations in relation to their protection as if they were classified as SPAs or SACs applies and they should therefore also be assessed within any HRA. Such sites have been considered within this document.

The requirements of the Habitats Directive are transposed into UK law by means of the Conservation of Habitats and Species Regulations 2010 (as amended), hereafter referred to as the Habitats Regulations. The process of assessing the implications of development on European Sites is consequently known as HRA.

¹ European Community (1992). Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora

² European Community (1979) Council Directive 79/409/EEC on the conservation of wild birds.

1.2. Natura 2000 Site Protection

Article 6 of the European Community (EC) Habitats Directive states that assessment is required where a plan/project may result in significant effect(s) to Natura 2000 site(s).

Paragraph 3 and Paragraph 4, Article 6 of the Habitats Directive states that:

'Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to Appropriate Assessment of its implications for the site in view of the site's conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject to paragraph 4 (see below), the competent national authority shall agree to the plan or project only having ascertained that it will not adversely affect the integrity³ of the site concerned and, if appropriate, after having obtained the opinion of the general public.'

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

1.3. Habitats Regulations Assessment Method

Under Article 6(3) and 6(4) of the Habitats Directive, any project/plan likely to have a significant impact upon Natura 2000 sites (either alone or in combination with other plans or projects) must be subject to Appropriate Assessment by a competent authority. The process for determining whether an Appropriate Assessment is required (screening), together with the Appropriate Assessment itself (where it is considered necessary following screening), is known as Habitats Regulations Assessment and is set out in Regulation 48 of the Habitats Regulations. Regulation 48 of the Regulations insofar as it concerns European sites (i.e. non-marine sites) is reproduced in **Table 1** below.

³ Integrity is the coherence of ecological structure and function, across a site's whole area, which enables it to sustain a habitat, complex of habitats and/or the levels of populations of species.

Table 1 Regulation 48 of the Habitats Regulations

Regulation 48	Assessment of implications for a European site
Regulation 48 (1)	A competent authority, before deciding to undertake, or give any consent, permission or other authorisation for, a plan or project which (a) is likely to have a significant effect on a European site in Great Britain (either alone or in combination with other plans or projects), and (b) is not directly connected with or necessary to the management of the site, shall make an Appropriate Assessment of the implications for the site in view of that site's conservation objectives.
Regulation 48 (2)	A person applying for any such consent, permission or other authorisation shall provide such information as the competent authority may reasonably require for the purposes of the assessment or to enable the competent authority to determine whether an Appropriate Assessment is required.
Regulation 48 (3)	The competent authority shall for the purposes of the assessment consult the appropriate nature conservation body and have regard to any representations made by that body within such reasonable time as the authority may specify.
Regulation 48 (4)	They shall also, if they consider it appropriate, take the opinion of the general public; and if they do so, they shall take such steps for that purpose as they consider appropriate.
Regulation 48 (5)	In the light of the conclusions of the assessment, and subject to regulation 49, the authority shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the European site.
Regulation 48 (6)	In considering whether a plan or project will adversely affect the integrity of the site, the authority shall have regard to the manner in which it is proposed to be carried out or to any conditions or restrictions subject to which they propose that the consent, permission or other authorisation should be given.
Regulation 48 (7)	This regulation does not apply in relation to a site which is a European site by reason only of regulation 10(1)(c) (site protected in accordance with Article 5(1) of the Habitats Directive).

HRA can only be undertaken by the competent authority (i.e. the body with decision-making responsibility in respect of the approval of the project or plan in question). In this case, the competent authority is the Local Authority (Cumberland Council CC)). The role of this document is therefore only to provide the information reasonably required to inform the completion of HRA by the Local Authority in accordance with Regulation 48(2).

The site sits within 10km of three Natura 2000 sites, and meets criteria requiring the completion of a bespoke HRA. The following Natura 2000 sites have been identified for consideration within this assessment:

- Morecambe Bay and Duddon Estuary SPA

- Drigg Coast SAC
- River Ehen SAC

No Pelagic Natura 2000 sites fall within the 10km buffer.

HRA comprises four distinct stages according to prescribed guidance and methods, as outlined below.

1.3.1. Stage 1: Screening

Screening is the process used to initially identify the likely effects upon a Natura 2000/Ramsar site by the proposed project/plans, either alone or in combination with other projects/plans and considers whether these impacts are likely to be significant. If the effect may be significant, or is not known, this may trigger the need for an Appropriate Assessment (Stage 2).

1.3.1.1. Relevant Case Law

Waddenzee Case (C-127/02)

The Court of Justice of the European Union (CJEU) established⁴ the precautionary principle in relation to the HRA, confirming that a plan or project may only be authorised where the competent authority has made certain that it will not adversely affect the integrity of the European site concerned. This is the case where there remains no reason for scientific doubt as to the absence of such effects.

“The competent national authorities... are to authorise such an activity only if they have made certain that it will not adversely affect the integrity of that site. That is the case where no reasonable scientific doubt remains as to the absence of such effects.”

Thus, adopting the precautionary principle established by the Waddenzee case, this assessment concludes that where reasonable scientific doubt exists regarding the absence of adverse effects on the integrity of a European site, those effects should be considered further within the assessment.

⁴ Waddenvereniging and Vogelbeschermingsvereniging v Staatssecretaris van Landbouw, Natuurbeheer en Visserij (C-127/02)

People over Wind/Sweetman Case C-323/17

However, more recently⁵, the Court of Justice of the EU ruled that Article 6(3) of the Habitats Directive must be interpreted as meaning that mitigation measures should be assessed within the framework of an Appropriate Assessment and that it is not permissible to take account of measures intended to avoid or reduce the harmful effects of the plan or project on a European site at the screening stage:

"In the light of all the foregoing considerations, the answer to the question referred is that Article 6(3) of the Habitats Directive must be interpreted as meaning that, in order to determine whether it is necessary to carry out, subsequently, an appropriate assessment of the implications, for a site concerned, of a plan or project, it is not appropriate, at the screening stage, to take account of the measures intended to avoid or reduce the harmful effects of the plan or project on that site... taking account of such [avoidance / reduction] measures at the screening stage would be liable to compromise the practical effect of the Habitats Directive in general, and the assessment stage in particular, as the latter stage would be deprived of its purpose and there would be a risk of circumvention of that stage, which constitutes, however, an essential safeguard provided for by the directive"

Thus, adopting the precautionary approach outlined within the Sweetman Case, this screening assessment considers the potential effects of the proposed development in the absence of mitigation.

1.3.2. Stage 2: Appropriate Assessment

Appropriate Assessment is the detailed consideration of the impact on the integrity of the Natura 2000 site by the proposed project/plan, either alone or in combination with other projects/plans, with respect to the site's conservation objectives, its structure and function. This is to determine whether or not there will be adverse effects on the integrity of the site. This stage also includes the development of any additional mitigation measures to avoid or reduce any possible impact(s).

Where there are predicted adverse impacts, an assessment of mitigation options is carried out to and an evaluation of the magnitude of predicted adverse effect on the integrity of the site is completed. If these mitigation options cannot avoid

⁵ People Over Wind and Sweetman v Coillte Teoranta (C-323/17)

adverse effects, then development consent can only be given if stages 3 and 4 are followed.

1.3.3. Stage 3: Assessment of Alternative Solutions

Assessment of Alternative Solutions is the process which examines alternative ways of achieving the objectives of the Project whilst avoiding adverse impacts on the integrity of a Natura 2000 site, should avoidance or mitigation measures associated with the proposed project/plan be unable to cancel out adverse effects.

1.3.4. Stage 4: Assessment where no Alternative Solutions Exist and where Adverse Impacts Remain

Should no alternative solutions be available, an assessment is made with regard to whether or not the development is necessary for imperative reasons of overriding public interest (IROPI) and, if so, of the compensatory measures needed to maintain the overall coherence of the Natura 2000 network.

1.4. Valuing the Proposed Development Site for Qualifying Species

Where appropriate, the value of the proposed development site and immediate surrounds for a Natura 2000 site qualifying species is determined by using the standard one percent criterion method⁶. Using this method, if the presence of >1% of the population of the European site is present, then the area is considered important for that species and any effects could be significant.

1.5. In-Combination Effects

A key requirement of the Habitats Directive is to determine whether the project/plan is likely to have a significant effect when considered in combination with other plans and projects. The main driver for addressing projects/plans in combination is ensuring that in-combination effects are captured. For example, the effects of a project/plan on air quality may be insignificant when considered in isolation, but when combined with the effects of increased air pollution from other plans, may lead to significant adverse impacts on site integrity.

⁶ Frost, T.M., Austin, G.E., Calbrade, N.A., Holt, C.A., Mellan, H.J. Hearn, R.D., Stroud, D.A., Wotton, S.R. & Balmer D.E.(2016). *Waterbirds in the UK 2014/15: The Wetland Bird Survey*. BTO, RSPB & JNCC in association with WWT. British Trust for Ornithology, Thetford

1.6. Report Methodology

This document follows Stage 1 of the HRA process and aims to fulfil the following objectives:

- Outline the legal requirements and guidance for undertaking a HRA (**Section 1**).
- Describe the development proposal (**Section 2**).
- Identify relevant Natura 2000/Ramsar/cSPA/cSAC site(s) that may be affected by the project (**Section 4**).
- Outline the qualifying features of the identified designated site(s) and consider how they may be impacted (**Section 5, Section 6 and Section 7**).
- Assess the potential adverse effects that may occur as a consequence of the development in isolation and in-combination with other projects/plans (**Section 8**).

2. The Proposed Development

2.1. Current Site Description

The site comprises a complex of agricultural buildings surrounded by hardstanding. It is located northwest of the Sellafield Nuclear Power Station in west Cumbria and is surrounded by a mosaic of agricultural fields and rough pasture, with the coast lying to the west.

2.2. Project Overview

Proposals comprise the demolition of agricultural buildings within the Greenmoorside Farm complex located within the site boundary. The current planning application relates solely to demolition works, and no redevelopment proposals are associated with the application. Accordingly, this Habitats Regulations Assessment considers only the potential effects arising from the proposed demolition works.

2.3. Relevant Guidance

2.3.1. The Copeland Local Plan 2021-2039

The Copeland Local Plan 2021-2039⁷ was adopted by Cumberland Council on 5 November 2024 and provides the planning policy framework for the former Copeland area of Cumberland outside the Lake District National Park. The Local Plan directs where new development will take place across the plan area and provides the policies against which planning applications are determined.

As the application site is located within the former Copeland administrative area, the relevant policies of the Copeland Local Plan 2021-2039 have been considered throughout this assessment.

The assessment has also been informed by the Report to inform a Habitat Regulations Assessment⁸ prepared in support of the Copeland Borough Council Publication Draft Local Plan Addendum in 2022. This document identifies the Natura 2000 sites with the plan area within the plan area and the principal impact

⁷ https://www.copeland.gov.uk/sites/default/files/attachments/copeland_local_plan.pdf [Accessed 9 July 2026].

⁸ https://www.copeland.gov.uk/sites/default/files/attachments/habitats_regulations_assessment.pdf [Accessed 13 July 2026].

pathways through which development proposals may affect their qualifying features.

3. Natura 2000 Sites with the Potential to be impacted by the Proposed Development

3.1. The Potential for Impacts to European Sites

The potential for impacts to occur to Natura 2000 site(s) as a consequence of the proposed development is largely determined by three key factors:

- whether there are any sites or qualifying features that could be directly affected by the proposed development;
- whether there are any sufficiently mobile qualifying features of the European site(s) that while distant from the scheme may rely on supporting habitat (see below) that would be affected by the scheme; and/or
- whether any of the potential effects of the scheme have the potential to indirectly affect receptors some distance from the scheme (for example through effects on water regime, increased traffic flow etc.).

Professional judgement has been used in this assessment (where appropriate), taking into account the conservation objectives for European sites, to determine whether or not significant effects are likely to result from the proposals.

3.2. Supporting Habitat(s)

Supporting habitat is the term used within this HRA to define undesignated areas located outside the boundary of a European site, but which contains habitats that support the qualifying features. This relates principally to mobile species, such as birds (and bats) that may rely on these areas for maintenance and support.

Loss of supporting habitat can be deemed, in some cases, to have a likely significant effect (and potentially adverse effect on site integrity).

3.3. European Sites Considered in this Document

All European sites within 10km (termed 'the zone of influence') of the proposed development site have been identified. Considering the nature of the proposed development and the identified potential effects associated with such projects no significant impacts to European sites outside this search area are considered likely.

Within 10km of the site boundary there are three Natura 2000 internationally designated sites; Morecambe Bay and Duddon Estuary SPA, Drigg Coast SAC

and River Ehen SAC. Information in relation these European sites is included in **Table 2**.

Table 2. Natura 2000 site details

Natura 2000 Site	Approx. distance from site	Qualifying Features	Conservation Objectives
Drig Coast⁹ SAC	5.45km/SE	The site is designated under article 4(4) of the Directive (92/43/EEC) as it hosts the following habitats listed in Annex I: Terrestrial qualifying features¹⁰ (Excluding Marine qualifying features): • H2110. Embryonic shifting dunes • H2120. Shifting dunes along the shoreline with <i>Ammophila arenaria</i> ("white dunes"); Shifting dunes with marram • H2130. Fixed dunes with herbaceous vegetation ("grey dunes"); Dune grassland* • H2150. Atlantic decalcified fixed dunes (<i>Calluno-Ulicetea</i>); Coastal dune heathland* • H2170. Dunes with <i>Salix repens</i> ssp. <i>argentea</i> (<i>Salicion arenariae</i>); Dunes with creeping willow • H2190. Humid dune slacks	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; >The extent and distribution of the habitats of the qualifying features. >The structure and function of the habitats of the qualifying features. >The supporting processes on which the habitats of the qualifying features rely. >The population of each of the qualifying features. >The distribution of the qualifying features within the site.

⁹ <https://publications.naturalengland.org.uk/file/6226945595408384> [Accessed 9 July 2026]

¹⁰ <https://publications.naturalengland.org.uk/file/4793154360573952> [Accessed 9 July 2026]

Natura 2000 Site	Approx. distance from site	Qualifying Features	Conservation Objectives
River Ehen¹¹ SAC	7.64km/N	The site is designated under article 4(4) of the Directive (92/43/EEC) as it hosts the following species listed in Annex II: Qualifying Features: • S1029. Freshwater pearl mussel <i>Margaritifera margaritifera</i> • S1106. Atlantic salmon <i>Salmo salar</i>	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; >The extent and distribution of the habitats of the qualifying features. >The structure and function of the habitats of the qualifying features. >The supporting processes on which the habitats of the qualifying features rely. >The population of each of the qualifying features. >The distribution of the qualifying features within the site.

¹¹ <https://publications.naturalengland.org.uk/file/5670571371134976> [Accessed 9 July 2026]

Morecambe Bay and Duddon Estuary SPA	8.08km/SW	The site qualifies as a SPA under Article 4.1 of the Birds Directive (2009/147/EC) by supporting populations of European importance of the following Annex I species: During the breeding season: • Little Tern <i>Sternula albifrons</i> – 84 individuals, representing 2.2% of the GB population (2010–2014). • Sandwich Tern <i>Sterna sandvicensis</i> – 1,608 individuals, representing 5.7% of the GB population (1988–1992). • Common Tern <i>Sterna hirundo</i> – 570 individuals, representing 2.0% of the GB population (Morecambe Bay SPA citation value, 1991). During the non-breeding season: • Whooper Swan <i>Cygnus cygnus</i> – 113 individuals, representing 1.0% of the GB population (2009/10–2013/14). • Little Egret <i>Egretta garzetta</i> – 134 individuals, representing 3.0% of the GB population (2009/10–2013/14). • European Golden Plover <i>Pluvialis apricaria</i> – 1,900 individuals, representing 1.0% of the GB population (Morecambe Bay SPA citation value, 1991). • Bar-tailed Godwit <i>Limosa lapponica</i> – 3,046 individuals, representing 8.0% of the GB population (2009/10–2013/14). • Ruff <i>Calidris pugnax</i> – 8 individuals, representing 1.0% of the GB population (2009/10–2013/14). • Mediterranean Gull <i>Larus melanocephalus</i> – 18 individuals, representing 1.0% of the GB population (2009/10–2013/14). The site also qualifies under Article 4.2 of the Birds Directive by supporting internationally important populations of the following regularly occurring migratory species: During the non-breeding season: • Pink-footed Goose <i>Anser brachyrhynchus</i> – 15,648 individuals, representing 4.5% of the biogeographical population (2009/10–2013/14).	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring: >The extent and distribution of the habitats of the qualifying features. >The structure and function of the habitats of the qualifying features. >The supporting processes on which the habitats of the qualifying features rely. >The population of each of the qualifying features. >The distribution of the qualifying features within the site.
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		• Common Shelduck <i>Tadorna tadorna</i> – 5,878 individuals, representing 2.0% of the biogeographical population (2009/10–2013/14). • Northern Pintail <i>Anas acuta</i> – 2,498 individuals, representing 4.2% of the biogeographical population (2009/10–2013/14). • Eurasian Oystercatcher <i>Haematopus ostralegus</i> – 55,888 individuals, representing 6.8% of the biogeographical population (2009/10–2013/14). • Grey Plover <i>Pluvialis squatarola</i> – 2,000 individuals, representing 1.0% of the biogeographical population (Morecambe Bay SPA citation value, 1991). • Common Ringed Plover <i>Charadrius hiaticula</i> – 1,049 individuals, representing 1.4% of the biogeographical population (2009/10–2013/14). • Eurasian Curlew <i>Numenius arquata</i> – 12,209 individuals, representing 1.5% of the biogeographical population (2009/10–2013/14). • Black-tailed Godwit <i>Limosa limosa</i> – 2,413 individuals, representing 4.0% of the biogeographical population (2009/10–2013/14). • Ruddy Turnstone <i>Arenaria interpres</i> – 1,359 individuals, representing 1.0% of the biogeographical population (2009/10–2013/14). • Red Knot <i>Calidris canutus</i> – 32,739 individuals, representing 7.3% of the biogeographical population (2009/10–2013/14). • Sanderling <i>Calidris alba</i> – 3,600 individuals, representing 3.0% of the biogeographical population (Morecambe Bay SPA citation value, 1991). • Dunlin <i>Calidris alpina alpina</i> – 26,982 individuals, representing 2.0% of the biogeographical population (2009/10–2013/14). • Common Redshank <i>Tringa totanus</i> – 11,133 individuals, representing 4.6% of the biogeographical population (2009/10–2013/14). • Lesser Black-backed Gull <i>Larus fuscus</i> – 9,450 individuals, representing 1.7% of the biogeographical population (2009/10–2013/14). • Lesser Black-backed Gull (<i>Larus fuscus graellsii</i>) (breeding) – 9,720 individuals, representing 2.7% of the biogeographical population (2011–2015). • European Herring Gull <i>Larus argentatus argenteus</i> (breeding) – 20,000 individuals, representing 1.0% of the biogeographical population (Morecambe Bay SPA citation value, 1991).	
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Natura 2000 Site	Approx. distance from site	Qualifying Features	Conservation Objectives
		Assemblage qualification: - The site also supports an internationally important waterbird assemblage, with a five-year peak mean of 266,751 individuals (2009/10–2013/14), comprising the qualifying species listed above and an additional 19 species including Great White Egret <i>Ardea alba</i>, Eurasian Spoonbill <i>Platalea leucorodia</i>, Light-bellied Brent Goose (Nearctic origin) <i>Branta bernicla hrota</i>, Eurasian Wigeon <i>Mareca penelope</i>, Eurasian Teal <i>Anas crecca</i>, Green-winged Teal <i>Anas carolinensis</i>, Mallard <i>Anas platyrhynchos</i>, Ring-necked Duck <i>Aythya collaris</i>, Common Eider <i>Somateria mollissima</i> (non-breeding), Common Goldeneye <i>Bucephala clangula</i>, Red-breasted Merganser <i>Mergus serrator</i>, Great Cormorant <i>Phalacrocorax carbo</i>, Northern Lapwing <i>Vanellus vanellus</i>, Little Stint <i>Calidris minuta</i>, Spotted Redshank <i>Tringa erythropus</i>, Common Greenshank <i>Tringa nebularia</i>, Black-headed Gull <i>Chroicocephalus ridibundus</i>, Common Gull (Mew Gull) <i>Larus canus</i> and European Herring Gull <i>Larus argentatus</i> (non-breeding). - The site supports an internationally important seabird assemblage of 40,672 individuals (1997 citation), including European Herring Gull <i>Larus argentatus</i>, Lesser Black-backed Gull <i>Larus fuscus</i>, Sandwich Tern <i>Sterna sandvicensis</i>, Common Tern <i>Sterna hirundo</i> and Little Tern <i>Sternula albifrons</i>	

4. Potential Effects - All Natura 2000 Sites

Within the report to inform the HRA¹² prepared in support of the Copeland Borough Council Publication Draft Local Plan and Addendum, a number of potential pathways of impact on Natura 2000 sites were identified. Having regard to the findings of that assessment, together with the nature, scale and location of the demolition works, an initial Stage 1 screening assessment has been undertaken to identify the potential impact pathways that are relevant to the proposed works. The results of this initial screening assessment are presented in Table 3. Where a potential impact pathway has been identified, it is considered further within the Stage 1 screening assessment for the relevant Natura 2000 site in Sections 5, 6 and 7.

Table 3: Initial screening assessment of all impact pathways.

Potential impact pathway	Screening outcome
Recreational pressure and disturbance	Screened out: The proposal comprises demolition works only and will not increase population, visitor numbers of recreational use of any Natura 2000 site.
Non-recreational disturbance (including noise, vibration and lighting)	Taken forward (where relevant to the qualifying features of the designated sites): This pathway has the potential to affect qualifying features depending on the proximity and sensitivities of each designated site and is therefore carried forward for assessment.
Air quality	Screened out: The works are remote (>5km) from all Natura 2000 sites and will not result in significant increase in traffic or air emissions. Construction dust effects are temporary and highly localised and therefore no credible pathway exists for their effects of the qualifying features of the designated sites.
Water availability and hydrological processes	Screened out: The proposal will not result in water abstraction or changes to water flows.
Water quality	Taken forward (where relevant to the qualifying features of the designated sites): Construction related pollutants have the potential to affect qualifying features if hydrological pathways exist and are therefore assessed further for each designated site.

¹²

https://www.copeland.gov.uk/sites/default/files/attachments/habitats_regulations_assessment.pdf [Accessed 13 July 2026].

Potential impact pathway	Screening outcome
Loss of or disturbance to supporting habitats	Screened out: The proposed works are confined to an existing urban site and will not result in the loss or disturbance of supporting habitats associated with the designated sites, with the closest designated site Drigg Coast being 5.45km away.
Urbanisation effects	Screened out: The proposal is demolition only and will not introduce new residential or urban land uses capable of giving rise to urban edge effects.
Direct mortality of qualifying species	Screened out: The proposed demolition works are located outside all Natura 2000 sites. No credible mechanisms exist through which proposed works could result in the direct mortality of the qualifying species of the designated sites.

5. Potential Effects - Drigg Coast SAC

Drigg Coast SAC is located approximately 5.45km southeast of the site. As shown in **Table 3**, the site is designated for several Annex 1 coastal dune habitats. The potential for impacts to habitat ecology/dynamics that could arise as a result of the proposed demolition works, either alone or in combination are assessed below.

Based upon the features for which the site has been notified and the nature of the proposed works at the site, a range of potential effects to the site could arise as a result of construction, operation or decommissioning of a proposed development, alone or in combination. These are summarised below:

- Changes to water quality
- Non-recreational disturbance

Details in relation to each of these sources of potential effect are considered further below.

5.1. Stage 1 – Screening Assessment

5.1.1. Changes to Water Quality

As shown in **Table 2**, the qualifying habitats of Drigg Coast SAC include humid dune slacks (H2190). Dune slacks are wetland habitats that occur in low-lying depressions between sand dunes and are dependent upon water quality. The *Report to Inform a Habitats Regulations Assessment* prepared in support of the Copeland Borough Council Publication Draft Local Plan and Addendum (2022) identifies the qualifying habitats of Drigg Coast SAC as being vulnerable to changes in water quality.

The proposed development comprises the demolition of an existing, small building cluster only. Whilst demolition activities have the potential to generate construction-related pollutants, including dust, sediment, contaminated surface water runoff and accidental spillages of fuels or other hazardous substances, Drigg Coast is located approximately 5.45km southeast of the site. Although an undesignated section of the River Ehen is located closer to the site, no credible pathway exists through which construction-related pollutants could be conveyed from the site to the qualifying habitats of Drigg Coast SAC. Given the separation distance between the proposed demolition works and the SAC and the absence

of an identified source–pathway–receptor linkage, construction-related pollution is not predicted to adversely effect the qualifying features of Drigg Coast SAC.

Accordingly, no Likely Significant effects associated with changes to water quality are predicted, and this potential effect is **not considered further**.

5.1.2. Non-recreational Disturbance

Construction activities, including demolition works, have the potential to generate noise, vibration, lighting and increased human activity. Where undertaken in close proximity to designated sites, these disturbances have the potential to adversely affect qualifying habitats and species.

For the reasons detailed within **Section 5.1.1**, there are no credible pathways through which noise, vibration, lighting or other construction-related disturbance could adversely affect the qualifying features of Drigg Coast SAC.

Accordingly, no Likely Significant Effects associated with non-recreational disturbance are predicted, and this potential effect is **not considered further**

6. Potential Effects - River Ehen SAC

The Potential for impacts to habitat ecology/dynamics could arise as a result of the proposed demolition works, either alone or in combination.

Based upon the features for which the site has been notified and the nature of the proposed development, a range of potential effects to the site could arise as a result of construction, operation or decommissioning of a proposed development, alone or in combination. These are summarised below:

- Changes to water quality
- Non-recreational disturbance

Details in relation to each of these sources of potential effect are considered further below.

6.1. Stage 1 – Screening Assessment

The results of the screening assessment for the sources of effect which could potentially occur in respect of the proposed development are presented below.

6.1.1. Changes to Water Quality

River Ehen SAC is designated for the Annex 1 habitat watercourses of plain to montane levels with the *Ranunculus fluitantis* and *Callitriche-Batrachion* vegetation (H3260), together with the Annex II species Atlantic salmon *Salmo salar* and freshwater Pearl mussel *Margaritifera margaritifera*, all of which are vulnerable to changes in water quality. The Copeland HRA notes that previous concerns regarding wastewater treatment capacity at Cleator Moor Wastewater Treatment Works have been resolved following completion of improvement works, with no current indication of capacity constraints.

The proposed project comprises the demolition of an existing building cluster only; whilst demolition activities have the potential to generate construction-related pollutants, including dust, sediment, contaminated runoff and accidental spillages, River Ehen SAC is located approximately 7.64 km from the proposed development. Although an undesignated section of the River Ehen is located approximately 0.8 km from the site, the designated section of the SAC lies upstream of the proposed development. Therefore, any pollutants arising from the demolition works would be conveyed downstream, away from the designated site. In addition to this there are no credible hydrological pathway that exists through

which construction-related pollution could adversely affect the qualifying features of River Ehen; consequently, this potential effect is **not considered further**.

6.1.2. Non-recreational Disturbance

Construction activities, including demolition works, have the potential to generate noise, vibration, lighting and increased human activity. Where undertaken in close proximity to designated sites, these disturbances have the potential to adversely affect qualifying habitats and species.

River Ehen is designated for the qualifying features listed in 6.1.1. Atlantic Salmon in particular are sensitive to disturbance during migration and spawning. However, the proposed demolition works are located approximately 7.64km from the designated section of the SAC. Given the temporary nature of the works and separation distance between the sites, there are no credible pathways through which noise, vibration, lighting or other construction-related disturbance could adversely affect the qualifying features of River Ehen.

Accordingly, no Likely Significant Effects associated with non-recreational disturbance are predicted, and this potential effect is **not considered further**

7. Potential Effects – Morecambe Bay and Duddon Estuary SPA

Morecambe Bay and Duddon Estuary SPA is located approximately 8.08km southwest of the site. As shown in **Table 2**, this statutory site is designated under Article 4.1 and 4.2 of Directive 2009/147/EC for a range of qualifying breeding, migratory and wintering bird species.

Based upon the features for which the site has been notified and the nature of the proposed development, a range of potential effects to the site could arise as a result of construction, operation or decommissioning of a proposed development, alone or in combination. These are summarised below:

- Changes to water quality
- Non-recreational disturbance

Details in relation to each of these sources of potential effect are considered further below.

7.1. Stage 1 – Screening Assessment

The results of the screening assessment for the sources of effect which could potentially impact Morecambe Bay and Duddon Estuary SPA as a consequence of the proposed project are presented below.

7.1.1. Changes in Water Quality

Changes in Water quality have the potential to adversely affect the qualifying bird species of Morecambe Bay and Duddon Estuary SPA through the deterioration of the estuarine and intertidal habitats on which they depend. A reduction in water quality may alter habitat condition, reduce the abundance and availability of prey and affect the ecological processes that support foraging, roosting and overwintering birds. During construction, changes in water quality could arise through accidental spillage of fuels, oils or other hazardous substances, the release of sediment-laden runoff or the mobilisation of contaminants associated with demolition activities. Although an undesignated section of the River Ehen is located closer to the site, no credible pathway exists through which construction-related pollutants could be conveyed from the site to Morecambe Bay and Duddon Estuary SPA, which is located approximately 8.08km from the site. Given

the separation distance between the proposed demolition works and the SPA and the absence of an identified source–pathway–receptor linkage, construction-related pollution is not predicted to adversely affect the qualifying features of Morecambe Bay and Duddon Estuary SPA.

Accordingly, this potential effect is **not considered further**.

7.1.2. Non-recreational Disturbance

The Copeland HRA states, *“The Proximity of noisy, visually intrusive or light-generating development can result in disturbance and displacement of species for which NSN and Ramsar sites are designated.”*

The proposed development comprised the demolition of an existing building cluster only. Whilst demolition activities have the potential to generate temporary noise, vibration, lighting and increased human activity, Morecambe Bay and Duddon Estuary SPA is located 8.08km away. Given the temporary nature of the works, the substantial separation distance between the proposed development and the SPA, and the absence of any identified source–pathway–receptor linkage, the proposed demolition is not considered likely to result in disturbance or displacement of the qualifying bird species, either.

Therefore, the proposed project is not considered likely to result in significant effects on Morecambe Bay and Duddon Estuary SPA either alone or in combination with other plans or projects. Consequently, this potential effect is **not considered further**.

8. In-combination Effects

As a general principle, the effects of small projects will always be insignificant compared with those of major projects (subject to their respective abilities to provide/deliver mitigation if necessary).

As has been demonstrated, the effects of the project proposals in isolation are considered to be insignificant. The small size of the proposed project would represent an insignificant contribution to any effect in-combination with other proposed developments.

As such, **no significant in-combination effects are predicted.**

9. Project Mitigation

In line with the Sweetman judgement (see **Section 1.3.1.1**), this HRA screening assessment considered potential effects in the absence of mitigation. However, the project will include the following measures to ensure environmental protection:

- Industry best practice will be employed during the construction phase of the project, to include the implementation of dust suppression measures if required and the appropriate storage of materials.

At this stage there is no specific construction program, and the proposed equipment and construction processes to be employed have not been determined. Industry best practice will be followed during all works.

10. Conclusions

The Habitats Regulations Screening Assessment concludes that **no significant effects** are likely for any European site as a result of the proposed development, either alone or in combination with other developments.