

Shadow Habitat Regulations Assessment: River Ehen SAC

Survey site:

Grove Court Hotel Cleator Cumbria, CA23 3DT

Client:

F Scott Buildings Ltd.

Date:

16/02/2026

Project:

This report is prepared to inform planning application 4/25/2048/0F1 Suggested Conditions with Cumberland Council. The development is described as: *'Residential development of 6 dwellings, former Grove Court Hotel, Cleator.'*

Executive Summary

- Following the HRA Stage 1: Screening outlined within, it is considered that risks from the proposed development (alone or in conjunction with other development) to River Ehen **cannot be dismissed**, as pathways exist which could lead to adverse effects on the integrity of the European site.
- **These are as follows;**
 - **Groundwater, Surface Water and Overland flow (run-off)**
 - **Particulate Matter (pm30)**
- **Stage 2: Shadow Assessment - Mitigation methods are discussed, which include:**
 - The implementation of a Construction Environmental Management Plan (CEMP), incorporating dust suppression, sediment control and site runoff management measures, alongside surface water drainage controls.
- Accordingly, an “Appropriate Assessment” **will be** required under Article 6(3) and 6(4) of the Habitats Directive before the Competent Authority (Ashford Borough Council) decides to undertake, or give any consent, permission or other authorisation for this plan.

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Version control

Status	Issue	Name	Date
Final	1.0	Laurence Wills ACIEEM BSc (Hons), Senior Ecologist	16/02/2026

Proportionality

The work involved in preparing and implementing all ecological surveys, impact assessments and measures for avoidance, mitigation, compensation and enhancement should be proportionate to the predicted degree of risk to biodiversity and to the nature and scale of the proposed development. Consequently, the decision-maker should only request supporting information and conservation measures that are relevant, necessary and material to the application in question. Similarly, the decision-maker and their consultees should ensure that any comments and advice made over an application are also proportionate.

This approach is enshrined in Government planning guidance, for example, paragraph 185 of the National Planning Policy Framework for England.

The desk studies and field surveys undertaken to provide a Preliminary Ecological Appraisal (PEA) or the HRA screening process might in some cases be all that is necessary.

(BS 42020, 2013)

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1.0 Introduction and Context

1.1 Background

Arbtech Consulting Limited was instructed by F Scott Buildings Ltd. to undertake a Shadow Habitat Regulations Assessment, to assess the likelihood and scope of likely significant impacts on the River Ehen SAC (henceforth described as “the designated sites”) within proximity of Grove Court Hotel Cleator Cumbria, CA23 3DT (henceforth described as “the proposed site”) of activities related to development activities within the proposed development area and activities relating to its subsequent use.

Cumberland Council may be required to undertake a Habitat Regulations Assessment (HRA) to assess the likelihood of adverse impacts of the proposed development on these designations in the form of an Appropriate Assessment (AA). This report represents an initial screening process that determines what if any likely significant effects may arise from the development and what further information is likely to be required to inform a full AA or other local mitigation strategies (such as financial contributions to access schemes).

1.2 Site Context

The site is located within the village of Cleator, Cumbria (national grid reference: NY 01931 14062) and extends to approximately 0.389ha. The site comprises an area of previously developed land where a former hotel building was situated, which has since been demolished in accordance with approved planning permission (ref: 4/23/2106/001). A narrow strip of grassland and a single tree are present along the southern boundary. The site is bounded by the A506 to the south, with residential dwellings located immediately to the east and west. The surrounding environment is heavily constrained by built development and road infrastructure, which is likely to present a significant barrier to wildlife movement. A proposed site plan is provided in **Appendix A** also showing the site location.

1.3 HRA Informative

European Sites

European sites include Special Protection Areas (SPAs) and Special Areas of Conservation (SACs), also collectively referred to as Natura 2000 sites. Natura 2000 sites (throughout Europe) or the National Site Network (following Brexit). The European Union Habitats Directive on the conservation of natural habitats and of wild fauna and flora (Council Directive 92/43/EEC) and the Birds Directive on the conservation of wild birds (Council Directive 79/409/EEC) place obligations on the UK to take certain actions for nature conservation. The Habitats Directive aims to maintain biodiversity and details measures to maintain or restore natural habitats and species at favourable conservation status. The Birds Directive protects all wild birds and their habitats and details special measures for migratory species and those that are considered to be vulnerable and/or rare. The Conservation of Habitats and Species Regulations 2017 (as amended), commonly known as 'The Habitats Regulations', transpose the Habitats Directive into national law and sets out the provisions for the protection and management of species, and habitats of European importance, including European sites.

Habitat Regulations Assessment

An HRA is required for any proposed plan or project which may have an adverse effect on one or more European sites. The purpose of HRA is to determine whether or not there are any likely significant effects (LSEs) on the integrity of any European site and, where LSE are identified, to provide mitigation measures to avoid, reduce or off-set the effects. HRA only legally applies to European sites. However, the National Planning Policy Framework (NPPF) recommends that the same level of protection is given to proposed or listed Ramsar sites.

All European and Ramsar sites overlap to some degree with nationally designated Sites of Special Scientific Interest (SSSIs). The HRA process does not apply to the broader conservation interests of the SSSI designations. However, the latter are addressed separately in the supporting ecological assessments produced in relation to the proposals.

HRA can be divided into the following stages:

1. HRA Stage 1: Screening for likely significant effects – identifying whether a project is likely to have a significant effect on a European site.

2. HRA Stage 2: Appropriate Assessment (AA) – collection of information, and determination of the effect the Proposed Development is likely to have on the integrity and designated features of the European sites ‘screened in’ during Stage 1.
3. HRA Stage 3: Mitigation and alternative solutions – where adverse effects are identified in Stage 2, the project should either be altered, or alternative solutions and mitigation specified to fully cancel out the adverse effects.

Habitat Regulations Assessment Screening Assessment

This step is a simple assessment to check or screen if a proposal:

- is directly connected with or necessary for the conservation management of a European site.
- risks enacting a significant effect on a European site on its own or in combination with other proposals.

Integral design features or characteristics, such as layout, timing and location will be considered to inform the screening decision. These, when well considered by the developer may mean that any risk to a European site is avoided and they do not need to do an appropriate assessment. The assessment will also examine the risk and scale of any indirect issues such as net increases in residents (and associated increases in recreational impacts). **At screening stage, the report should not consider any mitigation measures included by the proposer for the purpose of avoiding or minimising risk to a National Network Site. Mitigation measures are considered at Shadow/Appropriate Assessment.**

Appropriate Assessment

Should likely significant effects be identified, it is the responsibility of the LPA to conduct an Appropriate Assessment (AA) to quantify the scale of any likely adverse effect upon the integrity of The National Network Site/s and to factor in any mitigation measures. Additional survey work may be required to inform this and the results of such work are integrated into this report to form an informative Shadow Assessment, which will be used by the Competent Authority in their own AA.

Local Planning Policy – Cumberland Council

Cumberland Council Policy DC16 – Biodiversity and Geodiversity

Cumberland Council applies Policy DC16 – Biodiversity and Geodiversity (retained from the Cumbria Minerals and Waste Local Plan), which requires development proposals to protect, conserve and enhance biodiversity and geodiversity. Proposals should identify potential impacts on biodiversity assets and green infrastructure networks and demonstrate how adverse effects will be avoided, mitigated or, where necessary, compensated. Opportunities to enhance habitats and improve ecological connectivity should be incorporated wherever possible.

In accordance with Policy DC16:

- Development must avoid adverse effects on internationally designated sites, including Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites, unless it can be demonstrated through Habitats Regulations Assessment that there will be no adverse effect on site integrity, either alone or in combination with other plans or projects.
- Proposals affecting nationally designated sites, such as Sites of Special Scientific Interest (SSSIs), should avoid harm unless there are overriding reasons of public interest and no reasonable alternatives.
- Where impacts on biodiversity assets cannot be avoided, appropriate mitigation and long-term management measures are required, with compensation considered only where mitigation is not possible.
- Development is encouraged to support habitat restoration, enhancement and the wider ecological network, contributing positively to local and strategic biodiversity objectives.

2.0 Baseline Information

The following table describes qualifying features and site conservation objectives as cited by the JNCC.

European Site	European Site Descriptions
River Ehen SAC	River Ehen SAC is a high-quality river system in west Cumbria, flowing from Ennerdale Water to the Irish Sea. The site supports clean, fast-flowing waters with well-developed aquatic vegetation and is internationally important for its population of freshwater pearl mussel (<i>Margaritifera margaritifera</i>), alongside river habitats characterised by <i>Ranunculus fluitantis</i> and <i>Callitriche-Batrachion</i> vegetation. The SAC also supports white-clawed crayfish (<i>Austropotamobius pallipes</i>). The ecological integrity of the site is highly dependent on maintaining excellent water quality, natural flow regimes, and low sediment levels, with qualifying features particularly sensitive to nutrient enrichment, sedimentation, and hydrological change. Annex I habitats that are a primary reason for selection of this site 3260 – Water courses of plain to montane levels with the <i>Ranunculus fluitantis</i> and <i>Callitriche-Batrachion</i> vegetation The River Ehen supports high-quality river habitat characterised by clean, fast-flowing water and aquatic macrophyte communities, forming one of the best examples of this habitat type in north-west England. Annex II species that are a primary reason for selection of this site 1029 – Freshwater pearl mussel <i>Margaritifera margaritifera</i> The River Ehen supports an internationally important population of freshwater pearl mussel, which is highly sensitive to changes in water quality, sedimentation, and hydrological regime. Annex II species present as qualifying features 1092 – White-clawed crayfish <i>Austropotamobius pallipes</i> Site character - Inland running waters and river corridors - Associated riparian habitats, including marginal vegetation and adjacent grassland/woodland

	Catchment-dependent freshwater ecosystem with strong sensitivity to nutrient enrichment, fine sediment inputs, and physical disturbance
Threats	Water Quality Degradation: Increased nutrient inputs and fine sediment can adversely affect the river's qualifying habitats and species, particularly the freshwater pearl mussel, which is highly sensitive to changes in water chemistry, turbidity, and dissolved oxygen levels. Physical Disturbance and Sedimentation: Activities that increase bank erosion, channel disturbance, or sediment mobilisation can degrade riverbed habitats and interfere with mussel recruitment and aquatic vegetation. Hydrological Change: Alterations to natural flow regimes, abstraction, or catchment drainage can negatively affect habitat structure and ecological processes essential to maintaining the SAC's integrity. Development Pressure: Catchment-wide development may contribute to cumulative impacts through increased runoff, pollution pathways, and habitat modification, potentially reducing the overall ecological resilience of the river system.

3.0 HRA Stage 1: Screening for Likely Significant Effects

3.1 Potential Impacts of the Proposed Development on European Sites

The following potential impacts on a European site from the proposed development are given consideration were considered relevant:

- Generation of particulate matter (pm30) during construction
- Watercourse/body and groundwater pollution
- Water quality
- Light pollution
- Developmental pressure
- Noise disturbance
- Loss of associated habitat
- Fragmentation of associated habitat
- Hydrological changes
- Impacts to qualifying species of the European site, either directly or indirectly where they are considered to be functionally linked to the site.
- Recreational disturbance (especially dog walking)
- Vehicular emissions
- Nutrient neutrality (in the case of EU sites functionally linked to local river catchments)
- Synergistic impacts in combination with other projects.

Any impact requires a pathway to exist (direct or indirect) between the proposal and European Site, or functionally linked habitat. The Environmental Risk Management model, decrees that an environmental risk is present when there exists an unbroken risk pathway chain between the source of risk and the ecological receptor (Site and qualifying features), as illustrated below.

Risk → Pathway → Receptor

Where any element of this pathway is missing or broken, there can be no risk.

3.2 Evaluation of the Potential for Likely Significant Effects (LSEs) on European Sites

The below table details an assessment of potential for likely effects on Stodmarsh SAC/SPA from the proposed development. A traffic lights system is employed, with green used to illustrate no LSE and amber used to illustrate a LSE:

Evaluation of likely Risk Pathways	
Particulate Matter (pm30)	
Pathway	The risk that generation of constructional or operational aerial outputs such as dust, may impact air quality and damage habitats associated with protected sites to a degree likely to impact the integrity of the site.
Evaluation of risk	The development is located approximately 150m from the River Ehen SAC, which is designated for freshwater pearl mussel and associated river habitats that are highly sensitive to fine sediment and reductions in water quality. Although no direct works are proposed within the river corridor, construction activities have the potential to generate airborne dust and fine particulates which could be transferred via surface water pathways to the SAC. Given the proximity of the site and the sensitivity of the qualifying features, a potential pathway of risk exists and cannot be screened out at the screening stage. This pathway is therefore screened in for further consideration within the Appropriate Assessment.
Likely significant effect	
Ground or Surface Water Pollution	
Pathway	The risk that the transfer of pollutants from the site to the protected sites could take place via hydraulic connectivity of groundwater resources, via overland flow of surface waters or via watercourses to any standing running or groundwater resources linked to the ecological functioning of any qualifying habitat or species within or functionally linked to the European site and impact it to a degree impacting long term integrity.

Evaluation of risk	Groundwater The site is underlain by Devensian Till (diamicton) superficial deposits of Quaternary age, overlying the Buttermere Formation bedrock, comprising mudstone and sandstone deposited in deep marine environments. The area is identified as having medium to high groundwater vulnerability, with an associated soluble rock risk. Although no specific aquifer classification is available for the site, the proximity of the development (approximately 150m) to the River Ehen SAC indicates a potential hydraulic connection via surface water pathways and shallow groundwater flow. Given the sensitivity of the River Ehen SAC to changes in water quality, particularly in relation to fine sediment and nutrient inputs affecting freshwater pearl mussel populations, there is potential for pollutants generated during construction or operation to reach the SAC through overland flow or groundwater pathways. As such, a pathway of risk between the site and ground and surface water-dependent qualifying features of the SAC cannot be ruled out at the screening stage and is therefore screened in for further consideration within the Appropriate Assessment. Surface waters (Watercourses and Waterbodies) The River Ehen SAC lies approximately 150m from the development site and represents the primary surface water receptor. While no direct works are proposed within the river corridor, surface water drainage networks and local catchment pathways may provide a route for pollutants or fine sediments generated on site to reach the SAC. Given the proximity of the development and the sensitivity of the SAC's qualifying features, a surface water pathway cannot be excluded. This pathway is therefore screened in for further consideration within the Appropriate Assessment. Overland Flow (run off) The development site lies approximately 150m from the River Ehen SAC, and there remains potential for sediment-laden runoff or accidental pollutant release during construction to migrate towards the SAC via overland flow, particularly during periods of heavy rainfall. Although the site is brownfield and large-scale ground disturbance is not anticipated, temporary exposure of soils or changes to hardstanding may increase short-term runoff risk. Given the high sensitivity of the SAC to fine sediment and nutrient inputs, this pathway cannot be ruled out at the screening stage and is therefore screened in for further consideration within the Appropriate Assessment.
Likely significant effect	

Water quality	
Pathway	The risk that pollutants from the development, including sediment, chemicals, or wastewater, could be transferred to protected sites via wastewater treatment plants and associated plumbing.
Evaluation of risk	The development is not located within a designated Nutrient Neutrality catchment, and the receiving wastewater treatment facility, Cleator Wastewater Treatment Works, is also outside any Nutrient Neutrality catchment. The proposed development will likely connect to the existing mains sewer network, with wastewater treated off-site at Cleator Wastewater Treatment Works. The site was previously occupied by a hotel, which would have generated substantially higher wastewater volumes than the proposed six dwellings. As such, the redevelopment is likely to result in a net reduction in foul water discharge relative to the lawful baseline. Furthermore, the scale of the proposed residential development is modest and is significantly below Natural England's indicative consultation threshold of 20m³ per day. On this basis, and given the absence of a Nutrient Neutrality requirement for the River Ehen catchment, no meaningful increase in nutrient loading or deterioration in water quality is anticipated. The wastewater treatment pathway is therefore screened out, with no likely significant effect on the integrity of the River Ehen SAC, either alone or in combination with other plans or projects.
No likely significant effect	
Light Pollution	
Pathway	The risk that light spill into protected sites could impact upon light sensitive species population viability.
Evaluation of risk	The development lies approximately 150m northwest of the River Ehen SAC. Proposed lighting would be limited to low-level domestic sources and would not exceed the former hotel baseline. As the SAC's qualifying features are not light-sensitive, no meaningful pathway of risk is identified and this pathway is screened out .
No likely significant effect	

Developmental pressure	
Pathway	The risk that urban expansion and land use change associated with the development may contribute to habitat loss, fragmentation, or degradation of functionally linked land. This can result in a reduction of available space for qualifying species, increased edge effects, and ecological isolation, which may impact the long-term integrity of protected sites by restricting natural habitat dynamics and species movement.
Risk	The proposal relates solely on previously development land, with no loss of habitat or land-use change occurring on site. As there is no substantial habitat present and no impacts to species are anticipated, the risk of habitat loss, fragmentation, or degradation of functionally linked land does not arise. The pathway of risk can therefore be screened out .
No likely significant effect	
Noise Disturbance	
Pathway	The risk that noise generated during the development may disturb sensitive species present within protected sites.
Evaluation of risk	There is no risk pathway for noise disturbance to the protected sites because of the distant to the protected site, habitat separation and logarithmic distance attenuation.
No likely significant effect	

Loss, Damage or Fragmentation of Qualifying or Functionally Linked Habitat	
Pathway	The risk that the development may lead to loss or fragmentation of qualifying habitats or functionally linked habitats associated with protected sites.
Evaluation of risk	The site and its zone of influence contain no qualifying habitats and no associated habitat of importance to the functionality of the qualifying features of the protected sites.
No likely significant effect	
Impacts to Qualifying Species	
Pathway	The risk that the development may lead to impacts upon qualifying species in a manner that threatens the integrity (ability to persist) of their populations within protected sites (in this context “integrity” refers to ability to persist). This may be assessed in isolation or in combination with other developments. It addresses populations both within the site and any external “stepping stone” or other functionally linked habitats. Individual impacts pertaining to any relevant protected species legislation are beyond the scope of this assessment and where relevant are addressed separately.
Evaluation of risk	The development is isolated from habitats associated with the protected sites and contains no habitats of significance to qualifying species due to the lack of freshwater habitats on site. Therefore, the development is deemed to have no impacts upon qualifying species supported by the designated sites.
No likely significant effect	
Recreational disturbance	
Pathway	The risk in isolation, or in combination with other projects that the development may lead to adverse impacts upon habitats and species communities within the development via increased recreational pressure, including;

	Trampling, litter, vandalism, arson, disturbance of and destruction of wildlife by walkers, cyclists, motorbikes, cats and dogs and nutrient input via dog fouling. Dogs may also cause disturbance of fauna. An additional recreational pressure may include the collecting of flora and fauna, in particular fungi and wildflowers.
Evaluation of risk	The River Ehen SAC is designated for freshwater pearl mussel and associated river habitats, which are not sensitive to recreational disturbance of the type typically associated with residential development (e.g. trampling, dog walking, or visitor pressure). No strategic recreational mitigation scheme or zone of influence applies to this SAC, and the development replaces a former hotel use which would have generated a comparable or greater level of visitor activity. No new access to the river corridor is proposed. Accordingly, no meaningful pathway of recreational disturbance has been identified and this pathway is screened out.
No likely significant effect	
Vehicular emissions	
Pathway	The risk that the development either by itself or in combination with other LPA wide planning applications and projects may lead to adverse impacts upon qualifying habitats and species via atmospheric pollution caused by vehicles travelling on roads in close proximity to protected sites, resulting in deposition of toxic and nutrient enriching compounds, e.g Nitrogenous compounds on sensitive habitats, leading to alterations in species communities via the loss of air pollution/nutrient enrichment sensitive community members. Vehicle emissions can result in between 20 and 65% of total N deposition on European Sites in the UK. Development proposals (regardless of their type, size and location within the district) resulting in increases of one or more additional vehicles may contribute to increases in deposition. In addition, if other LPA wide projects result in increased traffic, the combined impacts may be greater than the sum of their individual parts.
Evaluation of risk	The proposed development comprises six dwellings on a brownfield site formerly occupied by a hotel, and is therefore unlikely to generate traffic levels exceeding the existing lawful baseline. The River Ehen SAC is designated for freshwater pearl mussel and associated river habitats, which are not sensitive to atmospheric nitrogen deposition in the same way as terrestrial vegetation

	communities. Given the small scale of the development, the absence of any material increase in traffic flows on roads in close proximity to the SAC, and the aquatic nature of the qualifying features, no meaningful pathway of risk from vehicle emissions has been identified. This pathway is therefore screened out, with no likely significant effect on the integrity of the River Ehen SAC.
No likely significant effect	

4.0 Consideration of Need to Progress to Stage 2: Appropriate Assessment

The development is not directly connected with or necessary for the conservation management of a European site.

Following the HRA Stage 1: Screening outlined within, it is considered that risks from the proposed development (alone or in conjunction with other development) to the River Ehen SAC **cannot be dismissed**, as pathways exist which could lead to significant adverse effects on the integrity of the European site.

These are as follows;

- **Groundwater, Surface Water and Overland flow (run-off)**
- **Particulate Matter (pm30)**

Accordingly, an “Appropriate Assessment” **will be** required under Article 6(3) and 6(4) of the Habitats Directive before the Competent Authority (Ashford Borough Council) decides to undertake, or give any consent, permission or other authorisation for this plan.

5.0 Stage 2: Appropriate Assessment

The Stage 1 screening assessment presented in Section 3 of this report identifies potential impacts related to water quality. It is the responsibility of the Local Planning Authority (Cumberland Council) to carry out an Appropriate Assessment. Accordingly, an assessment of the proposals, including consideration of mitigation measures, is provided below on behalf of the Local Planning Authority. **Subject to the implementation of the measures set out below, it is concluded that the development would not give rise to significant effects on the integrity of the protected site.**

5.1 Mitigation measures

Groundwater, Surface Water and Overland flow (run-off)

To ensure that no adverse effects on the integrity of the River Ehen SAC occur, construction will be undertaken in accordance with a Construction Environmental Management Plan (CEMP), secured by planning condition. The CEMP will include dust suppression, protection of exposed soils and stockpiles, installation of appropriate silt control measures, designated refuelling and chemical storage areas, emergency spill response procedures, and controls on site runoff to prevent untreated discharge to the surrounding environment.

Surface water drainage will incorporate sustainable drainage principles, including attenuation and treatment stages, ensuring post-development runoff rates and water quality do not exceed pre-development conditions, with exceedance flows managed within the site boundary.

With these measures in place, pathways for particulate matter and associated pollutants to reach the River Ehen SAC will be effectively controlled. The competent authority can therefore conclude, with scientific certainty, that the development will not adversely affect the integrity of the River Ehen SAC, either alone or in combination with other plans or projects.

Particulate Matter (pm30)

As identified at screening stage, construction activities have the potential to generate airborne dust and fine particulates which could be transferred via surface water pathways to the SAC. This pathway has therefore been screened in for Appropriate Assessment. Mitigation for particulate matter and associated sediment pathways is addressed within the shadow Appropriate Assessment through the implementation of a Construction Environmental

Management Plan (CEMP), incorporating dust suppression, sediment control and site runoff management measures, alongside surface water drainage controls, as detailed above.

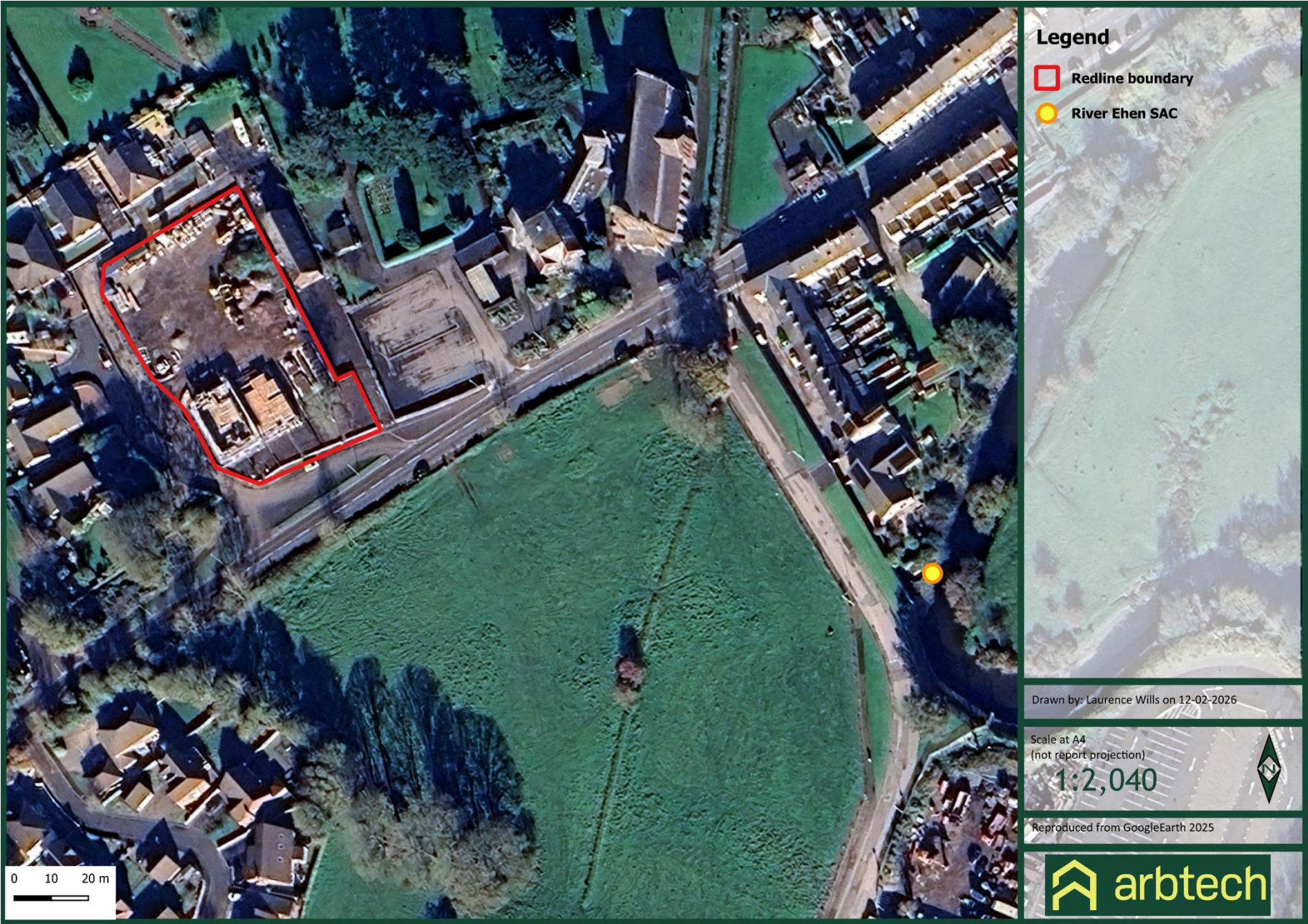
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Appendix 1: Proposed Development Plan



Appendix 2: Landscape View



Appendix 3: HRA Appropriate Assessment (AA) informative

The further stages of the HRA process are the domain of the Competent Authority. As such, Arbtech are unable to provide the following works, which are detailed below for informative purposes only.

The key stages of the Phase 2 HRA Appropriate Assessment (AA) will be:

- Complete additional scoping work including the collation of further information on sites as necessary to evaluate impact to take account of conservation objectives
- Agree scope and method of AA with Natural England (NE). The LPA will most likely be the body that shall conduct the Appropriate Assessment and it will require the applicants to provide the supporting information to undertake the assessment.
- Consider how proposals (“the plan”) ‘in combination’ with other plans and programmes will interact when implemented (this constitutes the “Appropriate Assessment”)
- Consider how effect on integrity of site could be avoided by changes to plan and the consideration of alternatives
- Develop mitigation measures (including timescale and mechanisms), if necessary
- Report outcomes of AA including mitigation measures, consult with Competent Bodies and wider [public] stakeholders as necessary. If it is determined that the project will not significantly affect European site it can proceed without further reference to Habitats Regulations. If there is residual doubt remaining after phase 2, the plan moves to Phase 3 and it will be necessary to:
 - Consider alternative solutions, delete from plan or modify
 - Consider if priority species/ habitats affected through further detailed evaluation
 - Identify ‘imperative reasons of overriding public interest’ (IROPI) economic, social, environmental, human health, public safety
 - Notify Government ▪ Develop and secure compensatory measures

The HRA process is often linked to the planning process and will often tend to run broadly in parallel with it.