

Report to inform the Habitats Regulations Assessment of the North Northumberland Coast Neighbourhood Plan Submission Version November 2017

North Northumberland Coast Steering Group

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1. Introduction

1.1 Background to the Project

AECOM was appointed by North Northumberland Coast Neighbourhood Plan Steering Group to produce a report to inform a Habitats Regulations Assessment (HRA) of the North Northumberland Coast Neighbourhood Plan (Pre Submission Consultation Draft February 2017), henceforth referred to as the Neighbourhood Plan. This report was submitted to the Steering Group in May 2017. Subsequently the Neighbourhood Plan has been revised and finalised and this report to inform a HRA has been updated in the light of these changes.

The HRA is required to evaluate the Likely Significant Effects (LSE) of the Neighbourhood Plan on internationally important wildlife sites within the zone of influence, and determine if there is a relevant connecting pathway.

At the time of the production of the report to inform the HRA of the Pre Submission version of the Neighbourhood Plan, Northumberland County Council had recently undertaken a HRA of the Northumberland Local Plan: Core Strategy Pre-Submission Draft June 2016 (henceforth referred to as the Northumberland Local Plan: Core Strategy HRA) The HRA screening identified the potential for policies relating to Spatial Distribution (Policy 3), Tourism and Visitor Development (Policy 9) and Housing Provision (Policy 15) to have significant effects on European Sites located within and immediately adjacent to the Plan area (i.e. the North Northumberland Coast). Consultation on further major modifications to the pre-submission draft of the Core Strategy took place in November and December 2016. These particular policies were highlighted as being likely to provide the same potential impact mechanism as policies included within the Neighbourhood Plan.

The potential effects identified (through HRA Screening of the Northumberland Local Plan- Core Strategy) relate to the following potential pathways:

- Increased disturbance to breeding, foraging, migratory and overwintering birds;
- Increased trampling damage to sensitive vegetation/habitats; and
- Potential predation of chicks by domestic pets.

Neighbourhood Plans are required to be in conformity with the relevant Local Plan. The Local Plan Core Strategy was withdrawn on 7 July 2017. The reasons for withdrawal of the Core Strategy related primarily to the publication of revised population and household projections which indicate that fewer new homes would be needed in the County; and, as a consequence, the local planning authority intended to review the approach taken in the Core Strategy towards Green Belt deletions which had been intended to accommodate housing growth in the south of the County.

Withdrawal of the Core Strategy included the withdrawal of all evidence base documents produced to support that plan. Some of that evidence has been used to inform policies proposed in the Neighbourhood Plan. The Core Strategy had provided an indicative housing apportionment for the Seahouses area, expecting the delivery of around 230 new dwellings between 2011 and 2031. The Neighbourhood Plan has had regard to this intention recognising the expectation that emerging neighbourhood plans should seek to demonstrate alignment with emerging strategic planning policy. Whilst the Core Strategy has now been withdrawn and has no weight in the plan-making process, and consideration of the policies contained in that plan have no statutory relevance to the independent examination of the Neighbourhood Plan, it is evident, from an Interim Planning Policy Position Statement published by the County Council in July 2017 that there is an intention to plan for no more, and probably less, housing across the County than that presented in the withdrawn Core Strategy. The Neighbourhood Plan has continued to assume housing growth at the level intended through that version of the Core Strategy.

The over-arching strategic Local Plan is not yet adopted, however, the Neighbourhood Plan was developed taking into account and building on both the development-led policies in the withdrawn Core Strategy and policies seeking to manage development to the benefit of the environment. The HRA that was undertaken for the developing Core Strategy remains a sound evidence base on which to assess the effects of the Neighbourhood Plan so long as the Neighbourhood Plan remains in conformity with expectations for future Local Plan development, and also so long as the protective policies contained within the Neighbourhood Plan remain robust in the absence of a fully developed Local Plan Core Strategy. . The withdrawn Core Strategy included Policy 28 'Principal of the Environment', which would facilitate strategic district-wide protection of internationally important wildlife sites. The HRA of this Neighbourhood Plan has been undertaken with this fact and likely future direction of the Local Plan development as a key consideration.

1.2 Objectives

The overarching objective is to provide sufficient information to enable the competent authority (i.e. Northumberland County Council) to undertake the HRA. In so doing, this assessment seeks to:

- Identify any aspects of the Neighbourhood Plan that would cause likely significant effects on the integrity of Natura 2000 sites, otherwise known as European Sites (Special Areas of Conservation (SACs), Special Protection Areas (SPAs) including potential (p) SAC/SPA and, as a matter of Government policy, Ramsar sites), either in isolation or in combination with other plans and projects; and
- To advise on appropriate policy mechanisms for delivering mitigation where such effects are identified.

At stage 1 (screening) of the HRA of the Neighbourhood Plan, if any Policies cannot be screened out as being unlikely to lead to significant effects, then stage 2 (appropriate assessment) will be required in order to devise measures that can be incorporated into the Neighbourhood Plan which will enable the North Northumberland Coast Neighbourhood Plan Steering Group in their role as 'competent authority' to conclude that no adverse effect on the integrity of European Sites will result.

The now withdrawn Local Plan Core Strategy was subject to its own Habitats Regulations Assessment, which examined development (particularly in terms of quantum) strategically across Northumberland, in combination with relevant surrounding authorities. The HRA of the Neighbourhood Plan has been informed by the policies and strategies within the emerging Core Strategy regarding avoidance and mitigation of any likely significant effects on European Sites; this is considered to remain relevant since the future direction of the Core Strategy is considered likely to reflect that of the withdrawn Plan. The overall quantum of development to be delivered in the Neighbourhood Plan area has been guided by the withdrawn Core Strategy and this Neighbourhood Plan does not allocate sites. Rather, the Neighbourhood Plan sets out principles against which the acceptability of development in the plan area will be judged. The development management policies that govern assessment and strategic mitigation for 'in combination' impacts on European sites will also be set by the emerging Core Strategy since, by definition, they cannot be addressed by a Neighbourhood Plan body on its own. The HRA of the Neighbourhood Plan does not therefore detail strategic issues associated with the overall amount of housing development in the Neighbourhood Plan area and there are no allocated development sites for the HRA to scrutinise. However, the HRA does examine whether Neighbourhood Plan policy adequately reflects protective mechanisms for European sites that are likely to be robust and in conformity with an emerging Core Strategy.

1.3 Legal Basis for a Habitats Regulations Assessment

The need for Habitats Regulations Assessment is set out within Article 6 of the EC Habitats Directive 1992), and transposed into British law by the Conservation of Habitats and Species Regulations 2010 (as amended) (refer to Box 1 below). The ultimate aim of the Directive is to "maintain or restore, at favourable conservation status, natural habitats and species of wild fauna and flora of Community interest" (Habitats Directive, Article 2(2)). This aim relates to habitats and species, not the European Sites themselves, although the sites have a significant role in delivering favourable conservation status.

The Habitats Directive applies the precautionary principle to European Sites. Plans and projects can only be permitted having ascertained that there will be no adverse effect on the integrity of the site(s) in question. Plans and projects with predicted adverse impacts on European Sites may still be permitted if there are no alternatives to them and there are Imperative Reasons of Overriding Public Interest (IROPI) as to why they should go ahead. In such cases, compensation would be necessary to ensure the overall integrity of the network of sites.

In order to ascertain whether or not site integrity will be affected, a Habitats Regulations Assessment should be undertaken of the plan or project in question.

Habitats Directive 1992

Article 6 (3) 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.”

Conservation of Habitats and Species Regulations 2010 (as amended)

The Regulations state that:

“A competent authority, before deciding to ... give any consent for a plan or project which is likely to have a significant effect on a European Site ... shall make an appropriate assessment of the implications for the site in view of that sites conservation objectives... 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”.

Box 1: The legislative basis for HRA

Over the years the phrase ‘Habitats Regulations Assessment’ has come into wide currency to describe the overall process set out in the Conservation of Habitats and Species Regulations 2010 (as amended) from screening through to IROPI. This has arisen in order to distinguish the process from the individual stage described in the law as an ‘appropriate assessment’. Throughout this report we use the term Habitats Regulations Assessment (HRA) for the overall process.

1.4 Structure of this Report

The principle components of this HRA report include the following:

- Identification of European Sites (Chapter 2);
- Methodology (Chapter 3);
- Consideration of the Impact Pathways / Mechanisms for Effect (Chapter 4);
- The results of the Screening Stage and the Scope of the HRA are summarised (Chapter 5);
- Policy Measures to Avoid Likely Significant Effects to European Sites and Conclusion (Chapter 6)

2. European Designated Sites

As part of the process, the HRA identifies the European Sites that should be considered in the assessment. The European Sites under consideration are all located immediately adjacent to or within North Northumberland Coastal Neighbourhood Plan Area or else are within a 10km buffer zone. In determining the scope, the HRA was influenced by the previous HRA work undertaken to develop the Northumberland Local Plan- Core Strategy.

In preparing the report to inform the HRA of the Neighbourhood Plan, policies were considered that related to housing provision and other developments within 10km of European Site boundaries, as well as the development of coastal tourism, which has the potential to create impact mechanisms that may result in disturbance to qualifying features of European Sites. These are the issues on which this report to inform the HRA Screening of the Neighbourhood Plan is focused.

The eight European Sites included in the assessment are listed below and are shown on Figure 1 Neighbourhood Plan and Designated Sites located in Appendix B:

- Berwickshire and North Northumberland Coast SAC
- Lindisfarne SPA
- Lindisfarne Ramsar Site
- Northumbria Coast SPA
- Northumbria Coast Ramsar Site
- Farne Islands SPA
- Northumberland Marine pSPA
- North Northumberland Dunes SAC

In order to inform the assessment, details of the European Sites are required for all stages of the Habitats Regulations Assessment. Table 1 below lists the qualifying features, conservation objectives, key conditions to support site integrity for each European Site.

Table 1. European Sites located within or adjacent to the Coastal Areas of the Neighbourhood Plan Boundary

Site and Location (closest point to the Neighbourhood Plan Boundary)	Quality Features	Conservation Objectives	Key Environmental Conditions to Support Site Integrity
Berwickshire and North Northumberland Coast SAC			
This site is located adjacent to the entire eastern boundary of the Neighbourhood Plan Area.	Large shallow inlets and bays. Intertidal mudflats and sandflats. Reefs. Submerged or partially submerged sea caves. Grey seal.	Subject to natural change, to maintain in (or restore to) favourable condition the - Extent, distribution, diversity and species richness of reef communities. Diversity of sea cave communities and their characteristic zonation. The extent of eelgrass and mussel communities and the diversity of infaunal communities in the intertidal mud and sandflats. Grey seal habitats, especially the extent and suitability of breeding habitat on the Farne Islands.	Reefs - no significant change in water clarity (e.g. due to increases in suspended material), temperature or salinity, or in the distribution of rocky shore communities. Sea caves - no significant change in water clarity (e.g. due to increases in suspended material), temperature or salinity, or in the distribution of sea cave biotypes. Intertidal mud or sandflats - no reduction in extent, no significant change in sediment character (particle size composition, organic content) ensuring no increase in the extent of algal mats or significant changes in the distribution and abundance of eelgrass beds, mussel beds or distribution of infaunal biotopes.
North Northumberland Dunes SAC.			
This site has a number of constituent parts. One is located within southern boundary of the Neighbourhood Plan boundary in Beadnell CP, and the second is located approximately 1.1km north-west of Neighbourhood Plan boundary (Budle Bay).	Fixed dunes with herbaceous vegetation *. Dunes with creeping willow Embryonic shifting dunes. Humid dune slacks. Shifting dunes with marram Petalwort.	Subject to natural change, to maintain in (or restore to) favourable condition the listed habitats. To maintain in (or restore to) favourable condition, the habitats for the population of petalwort.	Fixed dunes – appropriate grazing levels to maintain species and structural diversity, no increase in area occupied by invasive species. Dunes with creeping willow – maintain active successional processes. Embryonic shifting dunes – sufficient area between high water mark and stable dunes to allow development of embryonic dunes, presence of beach plain at low tide to supply blown sand. Humid dune slacks – maintenance of hydrological regime. Shifting dunes with marram – sufficient area between high water mark and stable dunes to allow development of embryonic dunes, presence of beach plain at low tide to supply blown sand, no increase in linear extent or area constrained by introduced structures or landforms, no increase in area where vegetation establishment is prevented by human activity. Petalwort - maintenance of very short vegetation in dune slacks
Lindisfarne SPA			
This site is mainly located to the north of the Neighbourhood Plan boundary; however a small section of this SPA is within the boundary itself (Bamburg CP).	Populations of Annex 1 species of European importance: Little tern. Roseate tern (both breeding species). Whooper swan. Golden plover. Regularly occurring migratory species of European importance: Purple sandpiper Turnstone. Greylag goose. Light-bellied Brent goose. Wigeon. Ringed plover. Bar-tailed godwit. Redshank. Wintering wildfowl assemblage of European Importance.	To maintain in (or restore to) favourable condition the intertidal mudflats and sandflats, saltmarsh, eelgrass beds and sand dunes for the populations of Annex 1 species. To maintain in (or restore to) favourable condition rocky shores with boulder and cobble beaches, intertidal mudflats and sandflats, saltmarsh and eelgrass beds for the regularly occurring migratory species. To maintain in (or restore to) favourable condition the intertidal sandflats and mudflats, saltmarsh, eelgrass beds and rocky shores for the wintering wildfowl.	All features – no significant increase in human disturbance. Annex 1 species – extent and quality of feeding habitat – eelgrass beds and saltmarsh (for whooper swan), mudflats and sandflats (for golden plover), no increase in obstructions to view lines (whooper swan and golden plover) maintenance of sparsely vegetated dunes for nesting (little tern). Migratory species – extent and quality of rocky shore feeding and roosting habitat (purple sandpiper and turnstone), no increase in obstructions to existing view lines (all geese and waders), extent and quality of eelgrass beds

Site and Location (closest point to the Neighbourhood Plan Boundary)	Quality Features	Conservation Objectives	Key Environmental Conditions to Support Site Integrity
			(light bellied Brent goose and wigeon), extent and quality of sandflats and mudflats (roosting for many species, feeding especially for ringed plover, bar tailed godwit and redshank)
Northumbria Coast SPA			
This site comprises a number of constituent parts, a number of which are located within the coastal boundary of the Neighbourhood Plan Area. The constituent parts are located to the south-easterly section of Bamburgh CP, the north-east and south-east coastal boundary of Seahouses, and the majority of the coastal boundary of Beadnell CP. One part is adjacent to the southernmost coastal boundary of Beadnell CP and this part is the location of the breeding terns.	Internationally important breeding population of little tern. Internationally important wintering populations of purple sandpiper	To maintain in (or restore to) favourable condition the sand dunes for the breeding population of little tern To maintain in (or restore to) favourable condition rocky shores with boulder and cobble beaches for wintering purple sandpiper and turnstone.	All features - no significant increase in human disturbance or that caused by off-lead dogs. Maintenance of sparsely vegetated dunes for nesting (little tern). Extent and quality of rocky shore feeding and roosting habitat (purple sandpiper and turnstone)
Farne Islands SPA			
This site is located over 2km (from the Northumberland coast measured from Islestone in Bamburgh) and hence not within the Neighbourhood Plan boundary),	Populations of Annex 1 species of European importance: Arctic tern. Sandwich tern. Turnstone	To maintain in (or restore to) favourable condition the habitats for the breeding populations of sandwich tern, common tern, arctic tern.	Little or no human disturbance No significant reduction in breeding productivity due to predation by large gulls, mixture of bare ground/short vegetation and longer vegetation, open terrain.
Northumberland Marine pSPA			
This site is located along the entire coastal boundary of the Neighbourhood Plan.	Internationally important breeding populations of Annex 1 species: Sandwich tern. Roseate tern. Common tern. Arctic tern. Little tern. Common guillemot. Atlantic puffin. An internationally important seabird assemblage of over 20,000 birds.	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring. The extent and distribution of the habitats of the qualifying features, the structure and function of the habitats of the qualifying features, the supporting processes on which the habitats of the qualifying features rely, the population of each of the qualifying features, and, the distribution of the qualifying features within the site.	This information is not yet available. The consultation relating to Northumberland Marine pSPA is currently being analysed. Some potential effects highlighted in this document ¹ include, recreational activities, fishing- by catch (where birds are caught in fishing nets leading to mortality). The consultation document raises the requirements for studies within the pSPA relating to incidental by-catch and effects of recreational disturbance in the SPA, and the development of a code of conduct to cover the marine SPA waters.
Lindisfarne SPA			

¹ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/492860/northumberland-marine-summary.pdf

Site and Location (closest point to the Neighbourhood Plan Boundary)	Quality Features	Conservation Objectives	Key Environmental Conditions to Support Site Integrity
<p>This site is mainly located to the north of the Neighbourhood Plan boundary; however a small section of this Ramsar site is within the boundary itself (Bamburgh CP).</p>	<p>Extensive intertidal flats, saltmarsh and major sand dune system with well- developed dune slacks. Wintering waterfowl assemblage of international importance. Internationally important migratory/wintering populations of: Light- bellied Brent goose. Wigeon. Ringed plover. Redshank. Greylag goose. Bar- tailed godwit. Rare plants: Petalwort. Lindisfarne helleborine (endemic on Lindisfarne).</p>	<p>To maintain in (or restore to) favourable condition intertidal mudflats and sandflats, saltmarsh and eelgrass beds for the regularly occurring migratory and wintering species. Subject to natural change, to maintain in (or restore to) favourable condition the sand dune system. To maintain in (or restore to) favourable condition, the habitats for the populations of petalwort and dune helleborine.</p>	<p>No significant increase in human disturbance, no increase in obstructions to existing view lines (all species), extent and quality of eelgrass beds (light bellied Brent goose and wigeon), extent and quality of sandflats and mudflats (roosting for many species, feeding especially for ringed plover, bar tailed godwit and redshank). Fixed dunes - appropriate grazing levels to maintain species and structural diversity, no increase in area occupied by invasive species e.g. pirri-pirri bur. Dunes with creeping willow - maintain active successional processes. Embryonic shifting dunes - sufficient area between high water mark and stable dunes to allow development of embryonic dunes, presence of beach plain at low tide to supply blown sand. Humid dune slacks - maintenance of hydrological regime. Shifting dunes with marram -sufficient area between high water mark and stable dunes to allow development of embryonic dunes, presence of beach plain at low tide to supply blown sand, no increase in linear extent or area constrained by introduced structures or landforms, no increase in area where vegetation establishment is prevented by human activity. Petalwort - maintenance of very short vegetation in dune slacks.</p>
Northumbria Coast Ramsar Site Northumbria Coast SPA			
<p>The site comprises a number of constituent parts, a number of which are located within the coastal boundary of the Neighbourhood Plan Area. The constituent parts are located to the south-easterly section of Bamburgh CP, the north-east and south-east coastal boundary of Seahouses and the majority of the coastal boundary of Beadnell CP.</p>	<p>Internationally important breeding population of little tern. Internationally important wintering populations of purple sandpiper and turnstone</p>	<p>To maintain in (or restore to) favourable condition the sand dunes for the breeding population of little tern To maintain in (or restore to) favourable condition rocky shores with boulder and cobble beaches for wintering purple sandpiper and turnstone.</p>	<p>All features - no significant increase in human disturbance maintenance of sparsely vegetated dunes for nesting (little tern). Extent and quality of rocky shore feeding and roosting habitat (purple sandpiper and turnstone).</p>

Source: (Northumberland Local Care Plan Core Strategy Pre-Submission Draft: Schedule for Proposed major Modifications June 2016 Habitats Regulations

3. Methodology

3.1 HRA Four Staged Assessment Process- Overview

Regulation 102 of the Habitats Regulations describe a procedure that provides for a systematic set of stages for the transparent consideration of the likely effects a plan or project could have on a European Site.

Guidance states that there are four stages in producing an assessment of a plan/project:

- Stage One: Screening - the process which identifies whether the plan is required for the management of European Site(s) and if not whether there are likely to be any effects upon a European Site as a result of the plan, either alone or in combination with other projects or plans, and considers whether these effects are likely to be significant;
- Stage Two: Appropriate Assessment - the consideration of the impact on the integrity of the European Site of the plan, either alone or in combination with other projects or plans, with respect to the site's structure and function and its conservation objectives. Additionally, where adverse effects on site integrity exist, an assessment of the effectiveness of potential mitigation of those impacts will be made;
- Stage Three: Assessment of alternative solutions- the process which examines alternative ways of achieving the objectives of the plan that avoid significant effects on the integrity of the European Site identified at Stage Two;
- Stage Four: Assessment where no alternative solutions exist and where adverse impacts remain an assessment of compensatory measures where, in the light of an assessment of imperative reasons of overriding public interest (IROPI), it is deemed that the plan should proceed.

Each stage determines whether a further stage in the process is required. If, for example, the conclusions at the end of Stage One are that there are no likely significant effects on the European Sites, there is no requirement to proceed further.

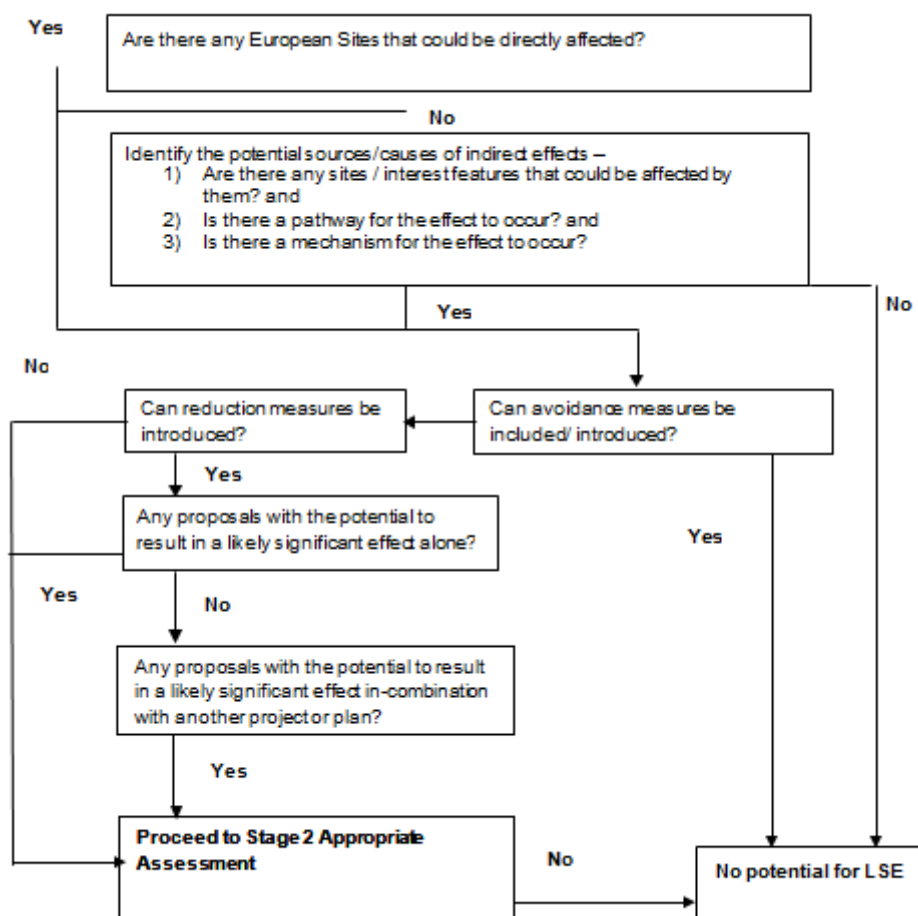
3.2 Stage One- Screening

The screening methodology uses sources, pathways and receptors. Each of these elements is considered, and used to screen out/in sources/pathways and receptors.

When screening in / out Sites and interest features it needs to be established whether there is a potential pathway between possible causes of effects and the features of the European Site. Where there are no sources or pathways to affect a European Site from the preferred approaches set out in the Neighbourhood Plan the Site / interest feature is considered no further.

Whilst screening constitutes Stage One of the overall HRA, screening has been broken down, as illustrated in Flowchart 1 into a series of sub stages to clearly demonstrate how conclusions have been reached.

Flowchart 1 Screening Methodology



3.3 Consultation with Statutory Bodies

By virtue of Regulation 5 (1), statutory consultation is required in respect of the appropriate assessment by virtue of Regulation 102 (2) which states:

“The plan-making authority must 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”.

The report will be handed to the County Council for review prior to it being sent to Natural England for consultation. Natural England was consulted in relation to the HRA

Screening Assessment² for the Northumberland Local Plan: Core Strategy Pre-Submission Draft (June 2016). In undertaking the HRA Northumberland County Council considered that the Northumberland Local Plan: Core

Strategy contained policies that were not spatially specific enough to address these pathways. The HRA concluded that there would be no resulting adverse effects on the integrity of European Sites but that these issues should be addressed when allocating sites within the Delivery Document and when determining planning applications. This conclusion was agreed to by Natural England in its consultation response.

A range of mitigation options (including developer contribution funded) were discussed to suit particular circumstances of proposed allocation, ranging from the provision of improvements to the rights of way network and specific dog-exercise areas, to more prescriptive measures such as dogs-on-leads orders or dog bans that could be imposed on areas of SPA. However ongoing research to support the development of appropriate policies in the Delivery Document was highlighted.

With regard to the Northumbria Coast SPA/Ramsar site, the North Northumberland Core Strategy HRA

² NE letter from Andrew Whitehead, dated 24th November 2015, ref 168765, Case 7450
Prepared for: North Northumberland Coast Steering Group

established the following points:

- A large proportion of the Northumbria Coast SPA wader population that occurs on the Northumberland Coast occurs in North Northumberland.
- The level of housing proposed for the North Northumberland coastal zone is very low, especially once the level of completed, consented and minded to approve development has been taken into account.
- The level of proposed housing in south east Northumberland is significantly higher than in north Northumberland, but the section of SPA in this area supports a much lower proportion of the SPA wader population.
- Because of the very large variations in the size of purple sandpiper and turnstone populations in different sectors of the SPA, it will only be possible to determine the impact of the proposed housing levels for the Local Plan once land allocations are proposed when the Delivery Document is being prepared.

Therefore, the Core Strategy HRA concluded that any increase in recreational disturbance arising from now withdrawn Policies 3, 9 and 15 of the Core Strategy would not have an adverse effect on the integrity of the Northumbria Coast SPA and Ramsar Site in respect of the specific interest features of purple sandpiper and turnstone, given that the document only identified overall housing requirements across delivery areas and for some settlements, and did not allocate sites. When specific site allocations are being considered during the preparation of future Development Plan Documents, the impact of these allocations on areas of SPA within 10km will need to be determined, so that the acceptability of specific proposed allocations and the nature and extent of any mitigation required can be determined prior to sites being allocated.

Further research was identified as being required prior to allocating housing sites to determine current levels of disturbance on specific areas of rocky shore and its impact on purple sandpiper and turnstone, so that the nature and extent of any mitigation required can be determined prior to sites being allocated. This work is currently being undertaken by a team led by Mark Whittingham, Professor of Applied Ecology at Newcastle University.

The Core Strategy HRA also concluded that there would be no adverse effect on the integrity of the Northumberland Marine proposed SPA or the tern colonies of the Northumbria Coast SPA and Ramsar site or Lindisfarne SPA. It also concluded that there would be no adverse effect on the North Northumberland Dunes SAC through trampling damage given the Core Strategy's approach of balancing the growth of tourism with environmental protection and the lack of current evidence of harm.

With regard to the other interest features of Lindisfarne SPA, the Core Strategy HRA concluded that now withdrawn protective policies for the Natural Environment (Policies 28-29) and for the Northumberland Coast AONB (Policy 31) combined with the wording of the Tourism Policy itself would ensure that adequate protection can be afforded to the SPA and Ramsar site when considering tourism-related development. The report to inform the HRA of the Neighbourhood Plan, in the absence of these overarching policies will seek to ensure that adequate protection is included within the Neighbourhood Plan to enable alignment with future direction of the Local Plan.

The conclusions of the Core Strategy HRA remain of relevance to the Neighbourhood Plan and have informed the HRA for the North Northumberland Neighbourhood Plan.

4. Potential Impact Pathways

4.1 Introduction

This section describes the potential impact pathways that may occur through the Policies of the Neighbourhood Plan.

It is considered that there are two main potential Impact Pathways in the context of the European Sites: Disturbance and Recreational Pressure and Habitat/Vegetation damage through trampling. This is in-line with the findings of the Northumberland Local Plan: Core Strategy Pre Submission Draft Schedule of Proposed Major Modifications June 2016 Habitats Regulations Assessment.

4.2 Disturbance and Recreational Pressure

Increasing recreational pressure is thought (Lilley 2003, Underhill-Day 2005 etc.) to increase the exposure of Annex 1 birds to disturbance, whilst increased damage to habitats may occur through trampling, soil compaction, erosion and nutrient enrichment.

HRAs of Local Plans tend to focus on recreational sources of disturbance as a result of new residents or an increasingly aging population with more leisure time available³.

Disturbance can be a significant impact arising from coastal recreation, with potential effects to nesting and feeding tern species, feeding and roosting migratory and winter waders and wildfowl and on fragile dune communities, especially off-lead animals, increase the effect of casual disturbance of birds by walkers.

Underhill-Day (2005) summarises the results of visitor studies that have collected data on the use of semi-natural habitat by dogs. In surveys where 100 observations or more were reported, the mean percentage of visitors who were accompanied by dogs was 54%. However these studies need to be treated with care. For instance, the effect of disturbance is not necessarily correlated with the impact of disturbance, i.e. the most easily disturbed species are not necessarily those that will suffer the greatest impacts. It has been shown that, in some cases, the most easily disturbed birds simply move to other feeding sites, whilst others may remain (possibly due to an absence of alternative sites) and thus suffer greater impacts on their population. A recent literature review undertaken for the RSPB also urges caution when extrapolating the results of one disturbance study because responses differ between species and the response of one species may differ according to local environmental conditions. These facts have to be taken into account when attempting to predict the impacts of future recreational pressure on European sites.

This section distinguishes between potential impacts on breeding birds (between March and August) and non-breeding birds (between August to May).

4.2.1 Breeding birds (March to August)

Disturbance effects for birds can have an adverse effect in various ways, with increased nest predation by natural predators as a result of adults being flushed from the nest and deterred from returning to it by the presence of people and dogs likely to be a particular problem. A literature review on the effects of human disturbance on bird breeding found that 36 out of 40 studies reported reduced breeding success as a consequence of disturbance. The main reasons given for the reduction in breeding success were nest abandonment and increased predation of eggs or young. Over years, studies of other species have shown that birds nest at lower densities in disturbed areas, particularly when there is weekday as well as weekend pressure.

A number of studies have shown that birds are affected more by dogs and people with dogs than by people alone, with birds flushing more readily, more frequently, at greater distances and for longer (Underhill-Day, 2005).

It should be emphasised that recreational use is not inevitably a problem. Many European sites are also National Nature Reserves or nature reserves managed by Wildlife Trusts and the RSPB. At these sites, access is encouraged and resources are available to ensure that recreational use is managed appropriately.

³ The RTP1 report 'Planning for an Ageing Population'(2004) which states that '*From being a marginalised group in society, the elderly are now a force to be reckoned with and increasingly seen as a market to be wooed by the leisure and tourist industries. There are more of them and generally they have more time and more money.*' It also states that '*Participation in most physical activities shows a significant decline after the age of 50. The exceptions to this are walking, golf, bowls and sailing, where participation rates hold up well in the 70s.*'

Where increased recreational use is predicted to cause adverse impacts on a site, avoidance and mitigation should be considered. Avoidance of recreational impacts at European sites involves location of new development away from such sites; Local Development Frameworks (and other strategic plans) provide the mechanism for this. Where avoidance is not possible, mitigation will usually involve a mix of access management, habitat management and provision of alternative recreational space.

Access management – restricting access to some or all of a European site - is not usually within the remit of the Council and restriction of access may contravene a range of Government policies on access to open space, and Government objectives for increasing exercise, improving health etc. However, active management of access is possible, for example as practised on nature reserves. Habitat management is not within the direct remit of the Council. However the Council can help to set a framework for improved habitat management by promoting cross-authority collaboration and S106 funding of habitat management.

Provision of alternative recreational space can help to attract recreational users away from sensitive European sites, and reduce additional pressure on them. Some species for which European sites have been designated are particularly sensitive to dogs, and many dog walkers may be happy to be diverted to other, less sensitive, sites. However the location and type of alternative space must be attractive for users to be effective.

Concern regarding the effects of disturbance on birds stems from the fact that they are expending energy unnecessarily and the time they spend responding to disturbance is time that is not spent feeding (this will apply all year round)⁴. Disturbance therefore risks increasing energetic output while reducing energetic input, which can adversely affect the 'condition' and ultimately survival of the birds. In addition, displacement of birds from one feeding site to others can increase the pressure on the resources available within the remaining sites, as they have to sustain a greater number of birds⁵. Moreover, the more time a breeding bird spends disturbed from its nest, the more its eggs are likely to cool and the more vulnerable they, or any nestlings, are to predators.

4.2.2 Non-breeding birds (August to May)

The potential for disturbance may be less in winter than in summer, in that there are often a smaller number of recreational users. In addition, the consequences of disturbance at a population level may be reduced because birds are not breeding. However, activity outside of the summer months can still cause important disturbance, especially as birds are particularly vulnerable at this time of year due to food shortages. Disturbance which results in abandonment of suitable feeding areas can have severe consequences for those birds involved and their ability to find alternative feeding areas. Several empirical studies have, through correlative analysis, demonstrated that out-of-season (October-March) recreational activity can result in quantifiable disturbance:

- Tuite et al⁶ found that during periods of high recreational activity, bird numbers at Llangorse Lake decreased by 30% as the morning progressed, matching the increase in recreational activity towards midday. During periods of low recreational activity, however, no change in numbers was observed as the morning progressed. In addition, all species were found to spend less time in their 'preferred zones' (the areas of the lake used most in the absence of recreational activity) as recreational intensity increased;
- Underhill et al⁷ counted waterfowl and all disturbance events on 54 water bodies within the South West London Water Bodies Special Protection Area and clearly correlated disturbance with a decrease in bird numbers at weekends in smaller sites and with the movement of birds within larger sites from disturbed to less disturbed areas;
- Evans & Warrington⁸ found that on Sundays total water bird numbers (including shoveler and gadwall) were 19% higher on Stocker's Lake LNR in Hertfordshire, and attributed this to observed greater recreational activity on surrounding water bodies at weekends relative to week days displacing birds into the LNR. However, in this study, recreational activity was not quantified in detail, nor were individual recreational activities evaluated separately; and

⁴ Riddington, R. et al. 1996. The impact of disturbance on the behaviour and energy budgets of Brent geese. *Bird Study* 43:269-279

⁵ Gill, J.A., Sutherland, W.J. & Norris, K. 1998. The consequences of human disturbance for estuarine birds. *RSPB Conservation Review* 12: 67-72

⁶ Tuite, C. H., Owen, M. & Paynter, D. 1983. Interaction between wildfowl and recreation at Llangorse Lake and Talybont Reservoir, South Wales. *Wildfowl* 34: 48-63

⁷ Underhill, M.C. et al. 1993. *Use of Waterbodies in South West London by Waterfowl. An Investigation of the Factors Affecting Distribution, Abundance and Community Structure.* Report to Thames Water Utilities Ltd. and English Nature. Wetlands Advisory Service, Slimbridge

⁸ Evans, D.M. & Warrington, S. 1997. The effects of recreational disturbance on wintering waterbirds on a mature gravel pitlake near London. *International Journal of Environmental Studies* 53: 167-182

- Tuite et al⁹ used a large (379 site), long-term (10-year) dataset (September – March species counts) to correlate seasonal changes in wildfowl abundance with the presence of various recreational activities. They found that shoveler was one of the most sensitive species to disturbance. The greatest impact on wildfowl numbers during these months was associated with sailing/windsurfing and rowing.

More recent research has established that human activity including recreational activity can be linked to disturbance of wintering waterfowl populations^{10 11}.

A recent study on recreational disturbance of the Humber Estuary SPA/Ramsar¹² was commissioned following a decline in numbers of some bird species from the Humber. This was considered necessary within the context of a likely future increase in residential development and an identification of the requirement for improved coastal access in order to inform future policies/management plans. The study collated on-site visitor survey data, targeted interviews with user groups, driving transects, car park counts and vantage point counts to identify the most visited areas of the SPA/Ramsar. These data were correlated with bird data (i.e. key locations for particular qualifying bird species within the SPA/Ramsar and therefore those areas likely to be considered particularly sensitive). This information was used to identify potentially key areas where conflicts were considered likely to arise between key recreational activities and bird interest. Key activities which were found to cause likely to disturbance to qualifying bird species (as already mentioned in this section) included: airborne activities; bait digging; beach activities; dog walking; fishing; horse riding; kite surfing; walking; wildfowling; and wildlife watching. This study serves to support the case of likely recreational disturbance on qualifying bird species through data collected on a relatively local and similar European Site, subject to similar pressures as the Northumberland Coast.

Human activity can affect birds either directly (e.g. through causing them to flee) or indirectly (e.g. through damaging their habitat). The most obvious direct effect is that of immediate mortality such as death by shooting, but human activity can also lead to behavioural changes (e.g. alterations in feeding behaviour, avoidance of certain areas etc.) and physiological changes (e.g. an increase in heart rate) that, although less noticeable, may ultimately result in major population-level effects by altering the balance between immigration/birth and emigration/death¹³.

The degree of impact that varying levels of noise will have on different species of bird is poorly understood except that a number of studies have found that an increase in traffic levels on roads does lead to a reduction in the bird abundance within adjacent hedgerows - Reijnen et al (1995) examined the distribution of 43 passerine species (i.e. 'songbirds'), of which 60% had a lower density closer to the roadside than further away. By controlling vehicle usage they also found that the density generally was lower along busier roads than quieter roads¹⁴.

A recent study on recreational disturbance on the Humber¹⁵ assesses different types of noise disturbance on waterfowl referring to studies relating to aircraft (see Drewitt 1999¹⁶), traffic (Reijnen, Foppen, & Veenbaas 1997)¹⁷, and dogs (Lord, Waas, & Innes 1997¹⁸; Banks & Bryant 2007¹⁹).

These studies identified that there is still relatively little work on the effects of different types of water based craft and the impacts from jet skis, kite surfers, windsurfers etc. (see Kirby et al. 2004²⁰ for a review). Some types of

⁹ Tuite, C.H., Hanson, P.R. & Owen, M. 1984. Some ecological factors affecting winter wildfowl distribution on inland waters in England and Wales and the influence of water-based recreation. *Journal of Applied Ecology* 21: 41-62

¹⁰ Footprint Ecology. 2010. Recreational Disturbance to Birds on the Humber Estuary

¹¹ Footprint Ecology, Jonathan Cox Associates & Bournemouth University. 2010. Solent disturbance and mitigation project – various reports.

¹² Helen Fearnley Durwyn Liley and Katie Cruickshanks (2012) Results of Recreational Visitor Survey across the Humber Estuary produced by Footprint Ecology <http://humberems.co.uk/downloads/Footprint%20Ecology%20Humber%20Visitor%20Report%206th%20July%202012.pdf>

¹³ Riley, J. 2003. Review of Recreational Disturbance Research on Selected Wildlife in Scotland. Scottish Natural Heritage.

¹⁴ Reijnen, R. et al. 1995. The effects of car traffic on breeding bird populations in woodland. III. Reduction of density in relation to the proximity of main roads. *Journal of Applied Ecology* 32: 187-202

¹⁵ Helen Fearnley Durwyn Liley and Katie Cruickshanks (2012) Results of Recreational Visitor Survey across the Humber Estuary produced by Footprint Ecology

¹⁶ Drewitt, A. (1999) Disturbance effects of aircraft on birds. English Nature, Peterborough.

¹⁷ Reijnen, R., Foppen, R. & Veenbaas, G. (1997) Disturbance by traffic of breeding birds: evaluation of the effect and considerations in planning and managing road corridors. *Biodiversity and Conservation*, 6, 567-581

¹⁸ Lord, A., Waas, J.R. & Innes, J. (1997) Effects of human activity on the behaviour of northern New Zealand dotterel *Charadrius obscurus aquilonius* chicks. *Biological Conservation*, 82,15-20.

¹⁹ Banks, P.B. & Bryant, J.V. (2007) Four-legged friend of foe? Dog-walking displaces native birds from natural areas. *Biology Letters*, 3, 611-613.

²⁰ Kirby, J.S., Clee, C. & Seager, V. (1993) Impact and extent of recreational disturbance to wader roosts on the Dee estuary: some preliminary results. *Wader Study Group Bulletin*, 68, 53-58

disturbance are clearly likely to invoke different responses. In very general terms, both distance from the source of disturbance and the scale of the disturbance (noise level, group size) will both influence the response (Beale & Monaghan 2005²¹). On UK estuaries and coastal sites, a review of WeBS data showed that, among the volunteer WeBS surveyors, driving of motor vehicles and shooting were the two activities most perceived to cause disturbance (Robinson & Pollitt 2002)²².

European Sites at particular risk of disturbance impacts include the Northumbria Coast SPA and Ramsar, Lindisfarne SPA and Ramsar Site and the North Northumberland Dunes SAC.

4.3 Habitat/vegetation damage through trampling

Sand dune ecosystems are very delicate and as a result, very susceptible to human interference and can be affected by trampling, which in turn can cause compaction and erosion. However, not all human interference has a direct impact on the sand dunes, but some human activities cause the weakening of the existing protection leaving them exposed to natural forces of wind and water, which damage the ecosystem.

Erosion of sand dunes, either due to recreation in the dunes themselves, or to use of the dunes as an access route, is particularly serious where the vegetation of the dune ridge has been breached, or where the dune front has been destabilised. Damage to the vegetation at these points can rapidly lead to blowouts and massive sand losses.²³

Walkers with dogs contribute to pressure on sites as they have potential to cause greater disturbance to fauna as dogs are less likely to keep to marked footpaths and also tend to move in a more erratic manner, this can also lead to erosion, which can in turn provide habitat more susceptible/suitable for invasive species. Erosion and trampling can affect sensitive species.

The influence of trampling was studied on the outer dune heath of Skallingen, southwest Jutland where the number of passages and the period of time over which trampling occurred was recorded. Hylgaard *et al* found a linear relationship between the depth of the paths and the number of passages. 2560 passes lowered the soil surface by 28 mm. The width of paths increased with increasing numbers of passages and the paths were slightly deeper when trampled on a single day as opposed to the effect of trampling over a period of 4 months. It was also recorded that relative cover was reduced with increasing numbers of passages; after 200 passages cover was only 50%.²⁴

The North Northumberland Dunes SAC interest features comprise embryonic shifting dunes; shifting dunes with marram grass; fixed dunes with herbaceous vegetation (a priority feature); dunes with creeping willow; humid dunes slacks; and a rare liverwort called Petalwort. Lindisfarne Ramsar qualifying features include major sand dune system with well-developed dune slacks.

In reference to the Northumberland Local Plan - Core Strategy Pre-Submission Draft (June 2016) HRA the six component SSSIs (conditions report) for the North Northumberland Dunes SAC do not contain references to access related problems. The current condition assessment of the component SSSI for Lindisfarne Ramsar places 100% of the site in favourable or unfavourable recovering condition.

Some trampling is required to maintain a proper dune succession and for example, petalwort, a rare liverwort that is one of the interest features of the North Northumberland SAC needs areas of low vegetation with limited completion from other plants, such that the edges of pathways provide one of the habitats in which it will grow. However excessive trampling can retard dune succession and access (by humans and dogs) provides the main spreading mechanism for the non-native invasive species piri-piri bur.

²¹ Beale, C.M. & Monaghan, P. (2005) Modeling the Effects of Limiting the Number of Visitors on Failure Rates of Seabird Nests. *Conservation Biology*, 19, 2015-2019

²² Robinson, J.A. & Pollitt, M.S. (2002) Sources and extent of human disturbance to waterbirds in the UK: an analysis of Wetland Bird Survey data, 1995/96 to 1998/99: Less than 32% of counters record disturbance at their site, with differences in causes between coastal and inland sites. *Bird Study*, 49, 205

²³ Information and advisory note number 1 <http://www.snh.org.uk/publications/on-line/advisorynotes/1/1.htm>

²⁴ The Effect of Human Trampling on a Sand Dune Ecosystem Dominated by *Empetrum nigrum* *Journal of Applied Ecology*. Hylgaard and M. J. Little Vol. 18, No. 2 (Aug., 1981), pp. 559-569

5. Screening of the North Northumberland Coast Neighbourhood Plan

5.1 Introduction

This section provides a summary of the results of the HRA Screening assessment of the Neighbourhood Plan for both the Alone and In-combination assessments. Tables A1 (alone) and Table A2 (In-combination) in Appendix A contain details of the Policies and the detailed screening assessment including reasoning for Likely Significant Effects. Figure 1 (located in Appendix B) provides the locations of the Neighbourhood Plan area, the settlement boundaries and the locations of the European Sites.

The Neighbourhood Plan contains 25 Policies that were assessed for the potential to cause likely significant effects (alone) on European Sites namely, Berwickshire and North Northumberland Coast SAC, Lindisfarne SPA, Northumbria Coast SPA, Farne Islands SPA, Northumberland Marine pSPA, Lindisfarne Ramsar Site, Northumbria Coast Ramsar Site, and North Northumberland Dunes SAC. The analysis took account of the overarching conclusions of the Northumberland Core Strategy HRA, which considered growth in the North Northumberland Neighbourhood Plan area as part of overall strategic growth – this level of growth is expected to remain valid for any future emerging Local Plan. Following the ‘alone’ assessment, those Policies found to have potential for likely significant effects were taken forward for the in-combination assessment.

5.2 Screening Results - ‘Alone’

The screening assessment ‘alone’ found no potential for likely significant effects on any European Sites for 21 of the Neighbourhood Plan Policies namely: Policies 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20 and 24.

Development or interventions covered by Policies 21, 22, 23 and 25 were considered to have potential to lead to likely significant effects on the following European Sites as currently worded: Northumbria Coast SPA/Ramsar and North Northumberland Dunes SAC. This was not due to specific developments proposed (as these policies do not make any allocations) but rather as a result of the lack of specificity in those policies with regard to the location, size and types of development.

In undertaking the report to inform a HRA of the Pre Submission draft of the Neighbourhood Plan it was recommended that these policies should include that they would avoid an adverse effect on the integrity of internationally important sites. In the case of policies 21 and 22 the advice specified that avoidance of effects on the Northumbria Coast SPA/Ramsar through increased visitor pressure would be a primary consideration.

The Neighbourhood Plan, in paragraph 3.3 now states that:

“Policy 3 is a policy which will apply to almost all other policies in the Neighbourhood Plan. Policy 3 therefore, is referenced in Policy 1, and in the supporting text to other relevant policies. Policy 3 must be considered in relation to all policy areas in the Plan, due to the proximity of national and internationally protected sites in the Plan area.”

Policy 3 states that:

“Development that would result in an adverse effect on internationally important wildlife sites will not be permitted unless it can meet the ‘No Alternatives’ and ‘Imperative Reasons of Overriding Public Interest’ tests set out in The Habitats Regulations unless adequate or compensatory provision has been agreed.

Planning permission for development that would result in an increase in temporary or permanent residents or an increase in recreational pressure on the European sites will require project-level Habitats Regulations Assessment. Planning permission will only be granted if it can be demonstrated that there will be no adverse effect on the integrity of any European site, either alone or in combination with any other relevant plans or projects.”

Policy 3 (Habitats and Species) makes it clear that planning permission for further development that would result in a net increase in residents will not be supported until Northumberland County Council’s strategic studies and mitigation initiatives have been devised.

In addition to protective wording in policy, a pro-active framework for specific interventions on the ground to protect European Sites from recreational pressure is likely to be required along the Northumberland coast as identified in

the now withdrawn Local Plan Core Strategy and its HRA. Strategic planning policy has not yet progressed to a stage where the necessary strategic approaches have substantially evolved or been agreed. There is also detailed research being undertaken by the University of Newcastle which is required prior to allocating housing sites to determine current levels of disturbance on specific areas of rocky shore and its impact on purple sandpiper and turnstone. This is required so that the nature and extent of any mitigation required can be determined prior to sites being allocated. These are strategic issues that are being taken forward by Northumberland Council.

The indicative quantum of new housing required in the Neighbourhood Plan area (230 dwellings, of which only c.100 remain to gain planning permission at time of writing) is not set by the Neighbourhood Plan but by the emerging Local Plan Core Strategy. Although the Neighbourhood Plan defines settlement boundaries, it does not allocate development sites. However, as the Neighbourhood Plan is progressing ahead of the wider spatial planning process it is necessary for the Neighbourhood Plan to define what is required for new development in order to ensure no likely significant adverse effects on European Sites and for it to be made clear that development (particularly housing) that would be covered by the Neighbourhood Plan must have regard to and provide general support for the recreation management initiatives being developed strategically by Northumberland County Council.

In line with the conclusions of the Core Strategy HRA, there are no Policies considered likely to have a significant effect on the Farne Islands SPA (due to the distance (over 2km from the Northumbria Coast) and accessibility, the Berwickshire and North Northumberland Coast SAC (due to the nature of qualifying features such as submerged or partially sea caves, large shallow inlets and bays, intertidal mudflats and sandflats and the locations of breeding grey seal sites). There are two main breeding populations of grey seals one of which is on the mainland at Fast Castle Head²⁵ which is approximately 14km north of the Neighbourhood Plan boundary. The other main breeding population (although not within the SAC) is located on the Farne Islands. Also in line with the conclusions of the Core Strategy HRA, there are no Policies considered to have likely significant effect on the Northumberland Marine pSPA. Therefore these sites are not included in any further assessment.

A detailed Screening assessment is found in Table A1 in Appendix A.

5.3 Screening Results – ‘In-Combination’

In considering the potential for effects of the above policies on European Sites the following overarching plans, have been considered:

Local

- Northumberland Local Plan Core Strategy (now withdrawn)²⁶
- Northumberland and North Tyneside Shoreline Management Plan 2 (Scottish Border to the River Tyne)(May 2009)²⁷
- Northumberland Area of Outstanding Natural Beauty Management Plan (2014-2019)²⁸
- Northumberland Destination Management Plan 2015-2020²⁹
- Northumberland Minerals Local Plan, 2000 (saved policies)³⁰
- Northumberland Waste Local Plan, 2001 (saved policies)³¹
- Northumberland County and National Park Joint Structure Plan, Policy S5 (Green Belt extension), 2005³²
- Alnwick District LDF Core Strategy DPD, 2007³³
- Berwick-upon-Tweed Borough Local Plan, 1999 (saved policies)³⁴

Adjacent Authorities

²⁵ <http://www.xbordercurrents.co.uk/key-features/berwickshire-north-northumberland-coast-sac/grey-seals/>

²⁶ at the time of production of the report to inform the HRA the current draft was the Northumberland Local Plan Core Strategy Pre-Submission Draft: Schedule of Proposed Major Modifications June 2016,

²⁷ Available on [<http://www.northumberland.gov.uk/NorthumberlandCountyCouncil/media/AONB/SMP2-Main-Report.pdf>]

²⁸ Available on http://www.northumberlandcoastaonb.org/files/Downloads/Northumberland%20Coast%20AONB%20Management%20Plan%202014-19_v1.2.pdf

²⁹ Produced by Northumberland tourism, Available on [<http://www.ntads.co.uk/downloads/NDMP2015-2020.pdf>]

³⁰ http://www.northumberland.gov.uk/WAMDocuments/93F91110-0F77-4C1A-9149-2A59618E6260_1_0.pdf?nccredirect=1

³¹ http://www.northumberland.gov.uk/WAMDocuments/008CDE1A-05BB-4875-AF12-9174DC48F6BC_1_0.pdf?nccredirect=1

³² http://www.northumberland.gov.uk/WAMDocuments/805D5DCB-C922-4066-BE40-9761EB549AFE_1_0.pdf?nccredirect=1

³³ <http://www.northumberland.gov.uk/NorthumberlandCountyCouncil/media/Planning-and-Building/planning%20policy/Consolidated%20Planning%20Policy%20Framework/Section%20A/Part%201%20-%20Adopted%20Statutory%20DPDs/4.%20Alnwick/Alnwick-District-LDF-Core-Strategy.pdf>

³⁴ <http://www.northumberland.gov.uk/NorthumberlandCountyCouncil/media/Planning-and-Building/planning%20policy/Consolidated%20Planning%20Policy%20Framework/Section%20A/Part%201%20-%20Adopted%20Statutory%20DPDs/5.%20Berwick-upon-Tweed/Berwick-upon-Tweed-Borough-Local-Plan.pdf>

- Northumberland National Park LDF Core Strategy and Development Policies, 2009³⁵
- North Tyneside Unitary Development Plan, 2002 (saved policies)³⁶
- Scottish Borders Local Development Plan, 2016³⁷

Regional

- The Strategic Economic Plan for the North East (NELEP, 2014)³⁸ this is a strategic report and does not lead to development
- Northumbria River Basin Management Plan 2009³⁹.
- The River Basin Management Plan for the Solway Tweed River Basin District: 2015 update⁴⁰
- Berwickshire & North Northumberland Coast European Marine Site Management Scheme 2014⁴¹ The detailed in-combination assessment can be found in Table A2 Appendix A.

No in-combination effects were found for any of the Policies with any of the aforementioned Plans.

5.4 Conclusion

This screening assessment carried out to inform the HRA of the North Northumberland Coast Neighbourhood Plan found that none of the Neighbourhood Plan Policies require to be taken forward to Stage 2 Appropriate Assessment and a conclusion of no likely significant effect can be drawn.

³⁵ http://www.northumberlandnationalpark.org.uk/wp-content/uploads/2014/12/cs_march_2009.pdf

³⁶ <http://www.northynteside.gov.uk/udp/ch5.html#nature>

³⁷ https://www.scotborders.gov.uk/info/20051/plans_and_guidance/121/local_development_plan

³⁸ <http://www.nelep.co.uk/wp-content/uploads/2014/11/North-East-Strategic-Economic-Plan-More-and-Better-Jobs.pdf>

³⁹ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/297473/gene0910bsrv-e-e.pdf

⁴⁰ http://www.sepa.org.uk/media/218890/rbmp_solway_tweed_2015.pdf

⁴¹ <http://www.xbordercurrents.co.uk/wp-content/uploads/2011/11/BNNC-EMS-FINAL-MANAGEMENT-SCHEME-MAY-2014-v1.0.pdf>

Appendix A : Screening Assessment

Table A1 provides the details of Screening 'Alone' Assessment

Table A2 provides the details of Screening 'In-combination' Assessment

Table A1: HRA Screening 'Alone' Assessment

Policy	Policy description	HRA implications
POLICY 1: SUSTAINABLE DEVELOPMENT	<p>Within the Neighbourhood Plan area, subject to compliance with Policy 3 and other relevant policies in the development plan, including those in this Plan, and having regard to other material planning considerations, small-scale development will be supported which provides:</p> <ul style="list-style-type: none"> a) new Principal Residence dwellings, including affordable housing to meet local needs, self-build units, live-work units, housing for older people and schemes which provide for a range of house types, including two, three and four bedroom dwellings and bungalows; b) local employment opportunities; c) new and expanded business premises; d) new and expanded social, community, leisure and educational facilities which contribute to the maintenance or growth of local sustainable communities <p>Major development in the AONB will not be permitted except in exceptional circumstances and where it can be demonstrated to be in the public interest and where there is no alternative location which could absorb the development without a significant adverse impact on the AONB.</p>	<p>This policy highlights the protection of the AONB but not European Sites. However, for European sites the policy cross-refers to Policy 3, which does seek to ensure their protection.</p> <p>At this stage exact locations, size or quantum of the small scale developments are unknown and therefore potential pathways considered for likely significant effects to the following European Sites include (as per the Local Plan Core Strategy HRA):</p> <p>Lindisfarne SPA/Ramsar – Disturbance to breeding terns (Little and Roseate terns) and over wintering waterfowl (recreational activities, including walking, angling, and dogs off leads), habitat trampling, potential for predation (chicks) from domestic pets (however, this is dependent on the location of, and type of the development(s)). The terns' breeding sites are located within the Lindisfarne NNR (within the SPA). This site is mainly located to the north of the Neighbourhood Plan boundary, however a small section of this SPA (and NNR) is within the boundary itself (Bamburg CP). The breeding site is over 1.5km north-west from the closest part of the Bamburgh settlement area. Natural England and The National Trust have been working to protect little terns in Northumberland for many years and a partnership between the National Trust, Natural England, the RSPB and the Northumberland Area of Outstanding Natural Beauty Partnership (the Northumberland Little Tern Project) is providing funding for extra seasonal staff, as well as additional fencing to enclose established and potential nesting areas¹. The continuation of existing wardening arrangements will be sufficient to ensure that this Policy will not increase disturbance to these colonies. Therefore it can be concluded that any increase in recreational disturbance arising from this Policy will not lead to likely significant effects on the integrity of Lindisfarne SPA in respect of the specific interest features of breeding little tern and arctic tern.</p> <p>Northumbria Coast SPA/Ramsar- disturbance to breeding populations of little terns. The terns' breeding site is adjacent to the southernmost coastal boundary of the NP Area at Beanel CP, and is located within Long Nanny Burn in Beadnell Bay. The breeding site is over 1km south from the closest part of the Beadnell settlement area. For the reasons outlined above for Lindisfarne, it can be concluded that any increase in recreational disturbance arising from this Policy will not lead to likely significant effects on the integrity of Northumbria Coast SPA/Ramsar in respect of the specific interest features of breeding little tern. However, it should be noted that the National Trust have no statutory obligation to continue the wardening at Beadnell Bay, and therefore when considering specific proposed developments that could affect the colony it is not appropriate to assume that this is adequate mitigation that will be provided in perpetuity at no cost to the developer. Accordingly, impacts on the little tern colony at Beadnell Bay must be fully considered when allocating sites in the Local Plan and when determining planning applications.</p> <p>Northumbria Coast SPA/Ramsar- The impacts of disturbance to wintering bird species (turnstone and purple sandpiper). When specific site allocations are being considered during the preparation of the Local Plan, the impact of these allocations on areas of SPA within 10km will need to be determined, so that the acceptability of specific proposed allocations and the nature and extent of any mitigation required can be determined prior to sites being allocated. For the Core Strategy HRA, further research was identified as being required prior to allocating housing sites in the Delivery Document in order to determine current levels of disturbance on specific areas of rocky shore and its impact on purple sandpiper and turnstone (wintering birds), so that the nature and extent of any mitigation required can be determined prior to sites being allocated. This work is currently being undertaken by a team led by Mark Whittingham, Professor of Applied Ecology at Newcastle University.</p> <p>North Northumberland Dunes SAC- vegetation/habitat trampling. However as the majority of the housing (230 dwellings set by the now withdrawn Core Strategy of which only c.100 remain to gain planning permission at time of writing) are to be located in Seahouses which is about 3km away from the SAC at its nearest point. The Northumberland Destination Management Plan 2015-2020 has a target to increase the number of visitors to Northumberland by 5% by 2020. Although the Neighbourhood Plan defines settlement boundaries, it does not allocate development sites. However, as the Neighbourhood Plan is progressing ahead of the wider spatial planning process it is necessary for the Neighbourhood Plan to be make clear that development (particularly housing) that would be covered by the Neighbourhood Plan must feed into the recreation management initiatives being developed strategically by Northumberland County Council.</p> <p>No allocations are made and the quantum of development is set by the Local Plan Core Strategy. It is considered that there is no potential for likely significant effects on European Sites as the policy is explicitly aligned with Policy 3 which seeks to ensure protection of European sites.</p>

¹ <https://www.rspb.org.uk/our-work/rspb-news/news/381494-bumper-breeding-year-for-rare-seabird-in-northumberland> (paragraph 8.27)

Table A1: HRA Screening 'Alone' Assessment

Policy	Policy description	HRA implications
POLICY 2: LANDSCAPES AND SEASCAPES	<p>Development proposals within or affecting landscape character areas should demonstrate how they respect the particular features of the landscapes in the Northumberland Landscape Character Assessment (2010) and any other relevant guidelines extant at the time the application is determined, including:</p> <ul style="list-style-type: none"> a) Estate landscapes and associated semi-natural and plantation woodland; b) The dynamic seascape, exposed coastal locations and views to the sea and coastal features and historic landmarks; c) Farmsteads of traditional vernacular architecture; d) Prominent natural and coastal features of the Farne Islands and Bamburgh Castle promontory; e) Traditional cores of fishing villages, with distinctive pantile roofscapes; f) Historic features associated with the fishing industry; g) Low-lying, exposed coastline, broad sandy beaches and tidal sands; h) Dune systems and the need for potential 'rollback' of Dunes <p>Great weight will be given to the conservation of these local landscapes, the Heritage Coast, and the scenic</p>	<p>This policy relates to the Neighbourhood Plan respecting landscape features in the Plan Area only so there are no impact pathways. Therefore no likely significant effects will occur to European Sites as a result of this policy</p>
POLICY 3: HABITATS AND SPECIES	<p>Proposals which promote the preservation and/or restoration of priority habitats in the Plan area will be supported.</p> <p>The impact of proposals in the Plan area on European Sites will be assessed in accordance with the Conservation of Habitats and Species Regulations 2010 (as amended) (The Habitats Regulations).</p> <p>Development that would result in an adverse effect on internationally important wildlife sites will not be permitted unless it can meet the 'No Alternatives' and 'Imperative Reasons of Overriding Public Interest' tests set out in The Habitats Regulations unless adequate or compensatory provision has been agreed.</p> <p>Planning permission for development that would result in an increase in temporary or permanent residents or an increase in recreational pressure on the European sites will require project-level Habitats Regulations Assessment. Planning permission will only be granted if it can be demonstrated that there will be no adverse effect on the integrity of any European site, either alone or in combination with any other relevant plans or projects.</p> <p>Proposals likely to have a negative effect on the notified interests of a Site of Special Scientific Interest (SSSI) will be refused unless it can be demonstrated that the benefits of the proposal clearly outweigh the impacts, no reasonable alternatives are available and mitigation, or where necessary compensation, is</p>	<p>This policy supports the natural environment as it safeguards current nature conservation sites. This policy is of beneficial value. No likely significant effects to European Sites will occur as a result of this policy.</p> <p>Any development (in particular) housing covered by the Neighbourhood Plan must feed into the strategic recreation management initiatives being developed strategically by Northumberland County Council and planning permission for further development that would result in a net increase in residents should not be supported until Northumberland County Council's strategic studies and mitigation initiatives have been devised.</p> <p>This has been covered within Policy 3.</p>
POLICY 4: COASTAL MANAGEMENT AND THE COASTAL STRIP	<p>Proposals for development along the Coastal Strip as defined on the Policies Map must comply with the principles for coastal management of this part of the Plan area in the most recent version of the Shoreline Management Plan. New development will not be supported along this coastal strip unless it is necessary for the management of the protected natural habitats along the coastal strip, or for coastal management purposes as identified in the Shoreline Management Plan except in exceptional circumstances.</p> <p>The creation of new habitats will be supported along the coastal strip, particularly where opportunities are identified in the most recent Shoreline Management Plan.</p>	<p>This Policy (as per the SMP2) is required to ensure that development does not take place in areas that may require future flood defences. It also looks to protect natural habitats along the coast, allowing for managed roll back of designated coastal sites. The Policy does, however, state that new developments 'in exceptional circumstances' would be supported along the coastal strip and seaward of the settlement boundary of any the settlements.</p> <p>Although no allocations are made and the quantum of development is set by the Local Plan Core Strategy, it is considered that based on this policy alone there is the potential for likely significant effects on European Sites. However, considering the Neighbourhood Plan in its entirety, it is considered that there is no potential for likely significant effects on European Sites as the Neighbourhood Plan in paragraph 3.3 seeks to align all policies with Policy 3 which seeks to ensure protection of European sites.</p>

Table A1: HRA Screening 'Alone' Assessment

Policy	Policy description	HRA implications
POLICY 5: DESIGN IN NEW DEVELOPMENT	<p>All new development in the Plan area, including extensions and conversions, should incorporate high quality design and demonstrate how:</p> <ul style="list-style-type: none"> a) local context and character is respected in terms of scale, density, height, massing, layout, materials, hard and soft landscaping, means of enclosure and access; and b) features including windows, doors, roof lights, chimneys, flues, roofs, and boundary treatments have regard to surrounding character and materials; and c) appropriate landscaping and the use of indigenous species have been incorporated into the scheme; and d) sustainable design measures have been incorporated including Sustainable Urban Drainage Systems where possible; and e) measures have been incorporated to limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation; and f) in terms of the massing, height, scale and proximity, of the proposed development does not result in an unacceptable loss of light or overshadowing, or other adverse amenity impacts on existing or future residents. <p>For areas within the Northumberland Coast AONB, this will include incorporating the principles</p>	<p>This policy relates to design of development in the Plan Area only so there are no impact pathways. Therefore no likely significant effects will occur to European Sites as a result of this policy.</p>
POLICY 6: SHOP FRONT DESIGN	<p>Proposals for alterations to existing shop fronts in North Sunderland, Seahouses, Beadnell and Bamburgh will be supported where they accord with the principles outlined in the Northumberland Coast AONB Design Guide (Shop Fronts). Shop front design proposals should ensure that:</p> <ul style="list-style-type: none"> a) the shop front should be considered as part of the whole building and any alteration should be sympathetic to its architectural character, scale and design, and those of adjacent buildings; and b) in order to retain a traditional shop front appearance, where one shop occupies two or more buildings, attempts should not be made to create a single unified shop-front across a combined frontage; and c) existing shop fronts of traditional design must be retained where possible and where relevant, repaired, as part of any shop front design; and d) illumination, where proposed, should limit the impact of light pollution on local amenity, intrinsically dark landscapes and nature conservation. <p>Where new shop fronts are proposed, or where no original design or detail has survived, proposals will be</p>	<p>This is a development management policy relating to the alterations of shop fronts and so there are no impact pathways. Therefore no likely significant effects to European Sites will occur as a result of this policy.</p>
POLICY 7: OUTDOOR SIGNAGE	<p>Proposals for signage requiring express consent will be expected to be of high quality design and a suitable size in proportion to the building or land on which the sign is proposed to be sited.</p> <p>Within the Northumberland Coast AONB, special consideration should be given to the impact on the special qualities of the AONB. Consideration will be given to the following:</p> <ul style="list-style-type: none"> a) whether the proposed sign will materially harm the visual amenity of the area and; b) whether the proposed sign will compromise public safety or pose a hazard to traffic; and c) the cumulative visual impact in relation to other advertisements in the vicinity results in harm to the visual amenity of the area. 	<p>This is a development management policy relating to outdoor advertising and so there are no impact pathways. Therefore no likely significant effects upon European Sites will occur as a result of this policy.</p>

Table A1: HRA Screening 'Alone' Assessment

Policy	Policy description	HRA implications
POLICY 8: SUSTAINABLE DEVELOPMENT WITHIN THE SETTLEMENTS	<p>Proposals for development that incorporates the design principles in Policy 5 will be supported within the defined settlement boundaries for Seahouses and North Sunderland, Beadnell and Bamburgh. All proposals must demonstrate how they will:</p> <ul style="list-style-type: none"> a) where relevant, incorporate access for pedestrians from the proposed development into the centre of the settlement and, where relevant, the beaches; b) preserve key coastal views into and out of the settlements; c) ensure sufficient car parking space is provided within the curtilage of the proposed development to ensure no impact of on-street parking on nearby streets; d) ensure that where infill development or conversions and extensions are proposed, they do not result in substantial loss of amenity space or loss of parking space which could result in an adverse impact on residential amenity from on-street parking on nearby streets; e) where relevant provide linkages between wildlife corridors for the benefit of biodiversity as shown on the Policies Map; f) incorporate native landscaping to reduce the impact of the development, and improve biodiversity; g) incorporate Sustainable Urban Drainage Systems where necessary; and h) contribute as necessary to any strategic mitigation initiatives devised to protect the Northumbria Coast SPA/Ramsar site, or other nationally and internationally important wildlife sites. <p>Proposals which provide additional visitor car parking and improved access for pedestrians within the settlements will be supported provided they accord with policies elsewhere in this Plan.</p> <p>Proposals resulting in the loss of existing car parking spaces will normally be refused unless equivalent alternative provision can be made in locations that are equally or more accessible than the parking spaces to be lost.</p> <p>Planning obligations will be sought where they are necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind to the development, for the following improvements:</p> <ul style="list-style-type: none"> i) Improvements to Broad Road as a result of new development to the east of Broad Road in Seahouses to make it safer for vehicles and pedestrians; and ii) Improvements to Swinhoe Road as a result of new development in Beadnell requiring access along Swinhoe Road, to make it safer for vehicles and pedestrians; and iii) Improvements to access to, and the setting of the Duckett in Bamburgh will be sought as part of any housing proposal on land adjacent to the Duckett. Sensitive landscaping will be expected as part of any development proposals along the southern part of the settlement boundary in Bamburgh.. 	<p>This policy will lead to development of new housing. The number of houses in NNCNP is anticipated to be 230 houses as planned in the now withdrawn Core Strategy, 110 already being built and the additional 120 to be built by the end of the Core Strategy period in 2031. These developments will increase the population of these settlements and therefore potential pathways for likely significant effects to European Sites as already outlined for Policy 1.</p> <p>Considering the Neighbourhood Plan in its entirety, it is considered that there is no potential for likely significant effects on European Sites as the Neighbourhood Plan in paragraph 3.3 seeks to align all policies with Policy 3 which seeks to ensure protection of European sites.</p> <p>Additionally, the policy commits all new proposals to contribute as necessary to any strategic mitigation initiatives devised to protect the Northumbria Coast SPA/Ramsar site, or other nationally and internationally important wildlife sites. .</p>
POLICY 9: SUSTAINABLE DEVELOPMENT OUTSIDE THE SETTLEMENT BOUNDARIES	<p>Outside the settlement boundaries as defined on the Policies Map, development will be restricted to appropriate development in the open countryside. Particular support will be given to:</p> <ul style="list-style-type: none"> a) single dwelling Principal Residences in the hamlets defined in Policy 15; b) rural business and economic development proposals; c) sensitively designed car parking proposals on the edge of settlements with pedestrian links to town or village centres; d) proposals for 'exception' sites of affordable housing provision where they do not have a negative impact on sensitive settlement edges; e) proposals in the harbour area of Seahouses and Beadnell where they are related to the ongoing function of the harbour; and f) conversion of redundant buildings for use as Principal Residences where these buildings were originally of substantial construction 	<p>These developments will increase the population of these settlements and therefore potential pathways for likely significant effects to European Sites as already outlined for Policy 1.</p> <p>Considering the Neighbourhood Plan in its entirety, it is considered that there is no potential for likely significant effects on European Sites as the Neighbourhood Plan in paragraph 3.3 seeks to align all policies with Policy 3 which seeks to ensure protection of European sites. .</p>

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Policy	Policy description	HRA implications
Policy 10: SEAHOUSES AND NORTH SUNDERLAND CONSERVATION AREAS	<p>Within the Seahouses and North Sunderland Conservation Areas development proposals will be required to preserve or enhance the character or appearance of the area. Development proposals, including extensions and alterations to existing buildings and structures, will be required to make a positive contribution to local character and distinctiveness. In particular, assessment of proposals should take into account their impact on the following specific elements identified in the North Sunderland and Seahouses Conservation Area Character Appraisals:</p> <ul style="list-style-type: none"> a) key buildings or landmarks in the Conservation Area and the impact of the proposal on them; b) significant view-points into and out of the Conservation Area as defined in the Conservation Area Character Appraisals; c) open space which contributes positively to the public realm; and d) how the proposal relates to the 'group value' of buildings where these are defined in the North Sunderland and Seahouses Conservation Area Character Appraisals maps. <p>Proposals which would lead to the enhancement of the appearance of buildings, spaces or features identified in the Conservation Area Character Appraisals Maps 2 and 3 will be particularly supported. Development of poor design that fails to take opportunities available for improving the character and quality of the Conservation Area and the way it functions will be refused.</p>	<p>This is a development management policy relating to conservation areas and therefore no impact pathways. No likely significant effects to European Sites will occur as a result of this policy.</p>
POLICY11 BAMBURGH CONSERVATION AREA	<p>Within the Bamburgh Conservation Area, development proposals will be required to preserve or enhance the character or appearance of the area. Development proposals, including extensions and alterations to existing buildings and structures, will be required to make a positive contribution to local character and distinctiveness. Particular consideration will be given to the following elements:</p> <ul style="list-style-type: none"> a) the impact of any development proposal on the setting of Bamburgh Castle and its environs; b) the setting of key open spaces, including Local Green Spaces within Bamburgh village; c) the use of vernacular materials specific to Bamburgh village as identified in the Northumberland Coast AONB Design Guide; d) the setting of listed buildings in Bamburgh; and e) the importance of the Duckett and its setting <p>Development of poor design that fails to take the opportunities available for improving the character and quality of the Conservation Area and the way it functions will be refused.</p>	<p>This is a development management policy relating to conservation areas and so there are no impact pathways. Therefore no likely significant effects to European Sites will occur as a result of this policy.</p>
POLICY 12: HISTORIC CORE OF BEADNELL	<p>Development proposals within or affecting the setting of the historic core of Beadnell as defined on the Policies Map must reflect the historic character of this area in terms of scale, height, design, and materials.</p>	<p>This is a development management policy relating to the historic core of Beadnell, so there are no impact pathways. Therefore no likely significant effects in upon European Sites will occur as a result of this policy.</p>
POLICY 13: NON DESIGNATED HERITAGE ASSETS	<p>The Neighbourhood Plan List of non-designated Heritage Assets are defined in Appendix A. Development, including renovation or alterations, affecting any non-designated heritage asset or its setting, whether locally listed, or identified in the North Northumberland Neighbourhood Plan List in Appendix A, should be sensitively designed having regard to the significance of the heritage asset including its archaeological, historic and architectural interest and its setting.</p>	<p>This is a development management policy relating to the non-designated heritage assets or settings and so there are no impact pathways. Therefore no likely significant effects in upon European Sites will occur as a result of this policy.</p>
POLICY 14: PRINCIPAL RESIDENCE HOUSING	<p>Proposals for all new housing, excluding replacement dwellings, will only be supported where first and future occupation is restricted in perpetuity to ensure that each new dwelling is occupied only as a Principal Residence.</p> <p>Principal Residence housing is that which is occupied as the sole or main home of the occupants and where the occupants spend the majority of their time when not working away from home.</p> <p>These restrictions will be secured prior to the grant of planning permission through appropriate Planning Obligations created and enforceable under section 106 of the Town & Country Planning Act 1990, or any subsequent successor legislation.</p>	<p>This is a strategic policy related to the requirements of new housing being occupied as a Principal Residence and so there are no impact pathways present. Therefore no likely significant effects to European Sites as a result of this policy.</p>
POLICY 15: PRINCIPAL RESIDENCE HOUSING IN HAMLETS	<p>New single dwellings including self-build and live-work units will be supported in the hamlets of Budle, Burton, Elford, Dukesfield, Tughall, Greenhill, Anstead, Glororum, East/West Fleetham, and Swinhoe.</p> <p>Any new dwellings in these hamlets must be well related to existing development and be of a nature and scale that reflects and respects the special character of the area in which it is situated. Any new dwelling in these hamlets will only be supported as a Principal Residence. The restriction to Principal Residence occupancy will be secured and retained in perpetuity through the imposition of an appropriate Planning Obligation created and enforceable under section 106 of the Town & Country Planning Act 1990, or any subsequent successor legislation.</p>	<p>This is a strategic policy seeking to restrict the number of second homes. No likely significant effects to European Sites as a result of this policy.</p>

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Policy	Policy description	HRA implications
POLICY 16: CHANGE OF USE FROM RESIDENTIAL (C3) TO HOLIDAY LET (SUI GENERIS)	<p>Proposals to change the use from residential (C3) use to holiday let (sui generis) will only be permitted where it can be demonstrated that:</p> <ul style="list-style-type: none"> a) Sufficient car parking space can be provided within the curtilage of the proposed holiday let to provide space for at least one vehicle per bedroom; b) There are no significant impacts on local amenity for nearby residents, in terms of noise disturbance, traffic generation and parking impacts. 	This is a strategic policy relating housing mix and types. Therefore there are no impact pathways present and no likely significant effects to European sites as a result of this policy.
POLICY 17: CHANGE OF USE FROM HOLIDAY USE TO PRINCIPAL RESIDENCE HOUSING	<p>Proposals for the change of use or removal of occupancy restrictions from holiday let use to Principal Residence housing, will be supported within the settlements of Beadnell, Bamburgh, Seahouses and North Sunderland and hamlets and smaller settlements identified in Policy 15 of the Neighbourhood Plan where the unit proposed for change of use or removal of occupancy restriction is suitable for permanent occupation. Future occupation shall be controlled as a Principal Residence in accordance with Policy 14 of the Neighbourhood Plan.</p> <p>This policy does not apply to the change of use, or replacement of chalets, static caravans, or other buildings or structures which are not suitable for permanent occupation.</p>	This is a strategic policy relating to change of use from holiday use to Principal Residence housing and so there are no impact pathways present. Therefore no likely significant effects to European sites as a result of this policy.
POLICY 18: EXTENSIONS TO HOLIDAY LETS	<p>All proposals for extensions to holiday lets must:</p> <ul style="list-style-type: none"> a) comply with the principles outlined in Policy 5 in relation to new extensions; and b) ensure that a reasonable amount of garden amenity space remains available for use by the occupiers of the holiday let; and c) ensure there is sufficient car parking space retained in the curtilage of the dwelling to provide for one space per bedroom including any extension; and c) demonstrate that the extended property will not significantly add to noise or other adverse amenity impacts on nearby residents as a result of an intensification of the use of the holiday let. 	This is a strategic policy relating the design of high quality design of extensions and annexes and there are no impact pathways present. Therefore no likely significant effects to European sites as a result of this policy.
POLICY 19: LOCAL GREEN SPACES	<p>The following sites are designated as Local Green Spaces and are shown on the Policies Map:</p> <p>Beadnell:</p> <ul style="list-style-type: none"> Be1: Old school playground (play area) Be2: The Haven Be3: Lady Hole Bay Be4: Ebb's Sneuk Be5: Grassed open spaces within Longstone Estate Be6: Open space between St. Ebbas Way and Longbeach Drive <p>Bamburgh:</p> <ul style="list-style-type: none"> Ba1: The Grove, the Triangle and grass verges in village centre Ba2: Castle Green (including play area) Ba3: Pepper close Fields (down Wynding) Ba4: Duckett Field (part of) <p>Seahouses and North Sunderland:</p> <ul style="list-style-type: none"> S1: Seafield playing field (football and golf) S2: Seahouses Middle School Playing Fields S3: Quarry Walk S4: Open space in front of St. Aidan's (originally tennis courts) S5: Seahouses First School Playing Fields S6: Open space at North Lane/Main Street (to the rear of Osborne Gardens) S7: Open Space at James Street (Stone Close) S8: Rotary Way (Broad Road) <p>Proposals for development on these sites will not be allowed except in very special circumstances, unless they are related to the enhancement or enjoyment of the Local Green Space.</p>	<p>A number of the green spaces are currently located adjacent to / in close proximity to European Sites. In Beadnell there are three green space designations adjacent to the following European Sites: Northumbria Coast SPA and Ramsar, Berwickshire & North Northumberland Coast SAC.</p> <p>In Seahouses there are two green space designations locations at the most seaward boundary of the settlement which is located less than 55m from the following European Sites; Northumbria Coast SPA and Ramsar, Berwickshire & North Northumberland Coast SAC.</p> <p>In Bamburgh one green space designation is located approximately 66m from the North Northumberland Dunes SAC.</p> <p>Potential likely significant effects of use of or change of use to local green space could increase visitors to European Sites. Supporting text to this policy states that any proposal involving the loss of Local Green Space must be considered alongside Policy 3 (Habitats and Species). Policy 3 seeks to ensure the protection of European sites, including the avoidance of an increase in visitor pressure on the Northumbria Coast SPA/Ramsar as a result of development within the Neighbourhood Plan.</p>

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Policy	Policy description	HRA implications
POLICY 20: ASSETS OF COMMUNITY VALUE AND COMMUNITY FACILITIES	<p>Proposals that will enhance the viability and/or the community value of community facilities and community assets, (whether registered as Assets of Community Value or not registered), will be supported.</p> <p>The loss of a registered Asset of Community Value (ACV), valued community facilities or the last public house, shop or community hall in any of the three settlements will be strongly resisted and robust justification will be required to demonstrate there is no longer a need for that facility or that the facility is no longer economically viable.</p>	<p>This policy relates to the retaining community facilities and assess of community and so there are no impact pathways. Therefore there are no likely significant effects to European Sites.</p>
POLICY 21: NEW TOURIST AND COMMUNITY FACILITIES	<p>The following proposals to provide small-scale new or improved visitor facilities will be supported where they accord with policies elsewhere in the Plan:</p> <ol style="list-style-type: none"> The provision of a base for low-impact water based recreational facilities and nature-based tourism at the Car Park in Beadnell; The provision of 'bunkhouses' for short-term accommodation for activity holidays where they can be accommodated with minimum impact on the landscape; A wet weather attraction at Seahouses; A Heritage Hub at Bamburgh; A new car park on the southern edge of the settlement boundary at Seahouses; Extended or improved visitor and/or recreational facilities at Seafield Gardens in Seahouses as shown on the Policies Map; Provision and/or improvements to public toilet facilities; and The expansion and improvement of visitor facilities at Bamburgh Castle 	<p>This policy will lead to development and low-impact water based recreational activities close to European Sites. At this stage exact locations, size or quantities of the small scale developments are unknown. The reference to low-impact activities is positive in that it relates to low impact on the environment and nature. However, the proposal does present potential pathways for likely significant effects to European Sites as already outlined for Policy 1.</p> <p>Any proposals for new or improved visitor facilities would need to demonstrate that they would avoid an adverse effect through an increase in visitor pressure within the Northumbria Coast SPA/Ramsar site or other internationally important wildlife sites.</p> <p>Considering the Neighbourhood Plan in its entirety, it is considered that there is no potential for likely significant effects on European Sites as the Neighbourhood Plan in paragraph 3.3 seeks to align all policies with Policy 3 which seeks to ensure protection of European sites.</p>
POLICY 22: FOOTPATHS AND CYCLE WAYS	<p>The creation and improvement of footpaths and cycle ways in the Plan area will be supported where there is not a negative impact on designated habitats. In particular, the improvement, creation and extension of the following routes:</p> <ul style="list-style-type: none"> Path and cycle path from Swinhoe to Budle Bay Creation of new path from Springhill Farm (caravan site) to Seahouses Creation of new path from Glororum (caravan site) to Bamburgh Improvements to the old railway line within Seahouses and North Sunderland 	<p>The current Policies Map (provided to AECOM 09/02/2017) does not show the locations of the footpaths and cycle ways. However, the Policy does specifically state that proposals will be supported where there is no negative impact on designated habitats.</p> <p>Any proposals for creation and/or improvements of footpaths and cycleways would need to demonstrate that their improvement would not result in an increase in visitor pressure within the Northumbria Coast SPA/Ramsar site.</p> <p>Considering the Neighbourhood Plan in its entirety, it is considered that there is no potential for likely significant effects on European Sites as the Neighbourhood Plan in paragraph 3.3 seeks to align all policies with Policy 3 which seeks to ensure protection of European sites.</p>
POLICY 23: BUSINESS AND EMPLOYMENT	<p>Proposals for new business premises and the extension and expansion of existing businesses in the Plan area will be strongly supported within and on the edge of the settlements where they are located and designed in accordance with policies elsewhere in the Plan.</p> <p>Support will be given to the following proposals provided they comply with policies elsewhere in the Plan:</p> <ol style="list-style-type: none"> Proposals for new small-scale enterprise hubs/business use in Beadnell; The use of the Walled Market Garden, redundant buildings at the Duckett and Bamburgh Hall Farm for small-scale business use in Bamburgh; A further employment site shown on the Policies Map is allocated for mixed employment use (Use Classes B1, B2 and B8) on land opposite the recycling facility at Seahouses. <p>The existing allocated employment site in North Sunderland shown on the Policies Map will be retained for employment use.</p> <p>In the open countryside, proposals for farm diversification schemes and other rural business enterprises which require a rural location will be supported where they comply with relevant policies elsewhere in the Plan.</p> <ol style="list-style-type: none"> Proposals for home working will be supported where the amenity and privacy of neighbouring residents is not significantly adversely affected. 	<p>This policy relates to development (expansion/extension) of businesses.</p> <p>Any proposals for new or extended business and employment facilities would need to demonstrate that they would an adverse effect on the integrity of internationally important wildlife sites.</p> <p>Considering the Neighbourhood Plan in its entirety, it is considered that there is no potential for likely significant effects on European Sites as the Neighbourhood Plan in paragraph 3.3 seeks to align all policies with Policy 3 which seeks to ensure protection of European sites.</p>
POLICY 24: BROADBAND INFRASTRUCTURE	<p>Proposals which secure the expansion of electronic communication networks and high speed broadband along with improvements to connectivity will be supported where the applicant has fully explored the opportunities to erect apparatus on existing buildings, masts or other structures and where the number of radio and telecommunication masts are kept to a minimum consistent with the efficient operation of the network; and where the development has been sited and designed to minimise the impacts on the character and appearance of the AONB.</p> <p>Applications for new development should ensure provision is made for suitable ducting to enable more than one service provider to provide a fibre connection to individual properties from connection cabinets located on the public highway, or some alternative point available to different service providers.</p>	<p>This policy relates to the expansion and security of electronic communications networks and reference is made to the minimisation of impacts to the AONB.</p> <p>Considering the Neighbourhood Plan in its entirety, it is considered that there is no potential for likely significant effects on European Sites as the Neighbourhood Plan in paragraph 3.3 seeks to align all policies with Policy 3 which seeks to ensure protection of European sites.</p>

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Policy	Policy description	HRA implications
POLICY 25: CARAVANS, CAMPING, BUNKHOUSES AND CHALETS	<p>Expansion of existing static caravan sites and the creation of new static caravan sites will not be supported.</p> <p>Proposals for bunkhouses, chalets, touring caravans and camping accommodation will be supported where they are small scale and can be accommodated without a negative impact on the local landscape. This will be determined through the submission of a Landscape and Visual Impact Assessment (LVIA)</p>	<p>This policy highlights the protection of the landscape from proposals for small-scale tourist accommodations (bunkhouses, chalets, touring caravans and camping accommodation) through the provision of a landscaping plan. At this stage exact locations, size or quantities of the small scale proposals are unknown.</p> <p>From this policy alone there is the potential for likely significant effects to all European Sites included in this assessment with the exception of the Farne Islands SPA (due to the distance of this Site and accessibility from the coast) and Berwickshire & North Northumberland Coast SAC due to the features of this Site (grey seal breeding sites are not within the Neighbourhood Plan).</p> <p>Proposals would need to demonstrate how their implementation would an adverse effect on the integrity of internationally important wildlife sites.</p> <p>Considering the Neighbourhood Plan in its entirety, it is considered that there is no potential for likely significant effects on European Sites as the Neighbourhood Plan in paragraph 3.3 seeks to align all policies with Policy 3 which seeks to ensure protection of European sites.</p>

Table A2. HRA Screening Assessment- 'In combination Assessment'

HRA Screening Assessment- 'In combination Assessment' Documents reviewed for In-combinations assessment														
Northumberland Coast AONB Management Plan 201-2019	Northumberland Destination Management Plan 2015-2020	Northumberland and North Tyneside Shoreline Management Plan 2 Scottish Border to River Tyne Final, May 2009	Northumberland Local Plan Core Strategy Pre-Submission Draft: Schedule of Proposed Major Modifications June 2016 (now	Northumberland Minerals Local Plan, 2000 (saved policies)	Northumberland Waste Local Plan, 2001 (saved policies)	Northumberland County and National Park Joint Structure Plan, Policy S5 (Green Belt extension), 2005	Alnwick District LDF Core Strategy DPD, 2007 -	Northumberland National Park LDF Core Strategy and Development Policies, 2009	North Tyneside Unitary Development Plan, 2002 (saved	Scottish Borders Local Development Plan, 2016	The Strategic Economic Plan for the North East (NELEP, 2014)	Northumbria River Basin Management Plan 2009	The River Basin Management Plan for the Solway Tweed River Basin	Berwickshire & North Northumberland Coast European Marine Site
No in- combination effects. This document supports the qualifying features of the European Sites included within the AONB.	No in- combinations effects. Whilst this document supports tourism growth it equally and actively supports the environment and refers to be fully coordinated with the Northumberland County Council Core Strategy.	There are no in-combination effects as this document as it clearly states the requirement for assessment for any likely effects to European Sites in order to maintain their integrity. An HRA has also been carried out for this Shoreline Management Plan, however a copy of such was not available at the time of preparing this report.	In combination effects are possible with the Local Plan since development across Northumberland will operate 'in combination' with that in the Neighbourhood Plan Area. However, the overall quantum of development to be allocated in the Neighbourhood Plan area will be set by the Core Strategy and the Neighbourhood Plan does not allocate sites. The development management policies that govern assessment and strategic mitigation for 'in combination' impacts on European sites will also be set by the Core Strategy since, by definition, they cannot be addressed by a Neighbourhood Plan body on its own.	One of the aims includes the protection ofCounty's resources such as good quality agricultural land and features of landscape, wildlife and heritage importance from undue disturbance or damage . This plan also includes an overarching policy to protect European Sites (EP4). No in combination effects	One of the chapters includes a number of policies that look to protect the environment. Policy EP9 details the protection afforded to International Sites and that proposals for waste development will not be permitted unless IROPI. No in combination effects.	No in combination effects as the green belt location relates to Morpeth which is located over 45km from the southern boundary of the Neighbourhood Plan boundary	This document states that potential issues relating to designated sites in relation to development. The document has a section regarding the natural environment and the requirements for the need for HRAs should any proposals have the potential to effect any European Sites. Policy S12 protecting and enhancing biodiversity and geodiversity	This document is strategic and takes into consideration other local./regional plans. It takes into consideration the importance of European Sites and contains a specific Policy (Policy 17 Biodiversity and Geodiversity) relating to the protection of European Sites within and outwith the National Park . No in combination effects-	This document includes a large chapter relating to the environment. Policies E12 and E12/1 related to the protection of important sites and European Sites. A large number of the policies within this UDP were not saved post September 2007, two of which include E12 and E12/1 however the document itself still retained the detailed information relating to legislative requirements of European Sites and that the UDP must apply a high level of protection in accordance with European Directives to SPAs and SACs. No in combination effects	This document includes a section on the Environmental relating to the challenges relating to the Scottish Borders and includes a Key Outcome (8) which included the protection of the natural and built environment. Policy EP1 International Nature conservation sites and protected species. No in combination effects	This is a strategic report and does not lead to development and therefore no in combination effects.	Page 8 of this Plan states that an HRA was carried out on this document and found it was unlikely to have significant negative effects on Natura 2000 sites. It goes on to detail that the plan itself does not require further assessment but any measures in the Plan must be subject to the requirements of the Habitats Regulations. No in combination effects.	No in combination effects. This report references the requirements for protection and increase of water quality of River Tweed SAC.	This document promotes the protection of European Sites and does not lead to development. No in combination effects.

¹ <https://www.rspb.org.uk/our-work/rspb-news/news/381494-bumper-breeding-year-for-rare-seabird-in-northumberland>

Appendix B : Figure 1

Figure 1: Neighbourhood Plan and Designated Sites