



**Northumberland**  
County Council

**HABITATS REGULATIONS  
ASSESSMENT REPORT**

**October 2020**

**of**

**Seaton Valley Neighbourhood Plan  
Pre-submission Draft, September 2020**

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of  
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Habitats Regulations Assessment Report, October 2020 of Seaton Valley Neighbourhood Plan Pre-Submission Draft September 2020		
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# 1. Introduction

## **Purpose of the Habitats Regulations Assessment Report**

- 1.1 Seaton Valley Community Council are leading the preparation of a neighbourhood development plan (the Plan) to provide locally specific planning policies intended to address issues identified as being important to the local community, particularly where those issues are perceived as not being adequately addressed through existing planning policies.
- 1.2 As the 'competent authority' under the Conservation of Habitats and Species Regulations 2017, Northumberland County Council is required to assess development plans through the HRA process. The purpose of a HRA is to assess possible effects of development plans on the nature conservation interests of sites designated under the Habitats and Wild Birds Directives. These sites consist of Special Areas of Conservation, Special Protection Areas and also include Ramsar Sites. The HRA process is an iterative process and the integration of the HRA process as part of the preparation of development plans is fundamental to the plan making process as policies in the plan can potentially affect designated sites.
- 1.3 HRA is an iterative process and the remaining stages will be completed alongside and will inform preparation of the Plan. The screening opinion provided in this Report will be reviewed once the Plan is submitted to the County Council to ensure that any revisions to policies arising following the pre-submission consultation stage do not result in any variation to this opinion.

## **Format of the Habitats Regulations Assessment Report**

- 1.4 This HRA Report establishes the scope of and the process for completing the HRA of the Seaton Valley Neighbourhood Plan Pre-Submission Draft September 2020 and undertakes an assessment of the Plan. The HRA Report includes the following:
  1. HRA requirements and process.
  2. Stage 1A: Identifies the European sites.
  3. Stage 1B: Identifies the Trend Analysis.
  4. Stage 1C: Analysis of proposals and policies in the Seaton Valley Neighbourhood Plan - Identification of Likely Significant Effects
  5. Stage 1D: Consideration of other plans and projects
  6. Stage 2: Appropriate Assessment
  7. Conclusion
  8. BibliographyAppendices

## Habitats Regulations Assessment Consultation

- 1.5 It is a requirement of the Habitats Regulations to consult the appropriate nature conservation statutory body (Natural England). Consultation has taken place and Natural England confirm their agreement with the County Council, that the Seaton Valley Neighbourhood Plan can be screened out of further stages of assessment. This is confirmed in a letter dated 25<sup>th</sup> November 2020 and included as Appendix 1. Further consultation may be undertaken subject to the inclusion of modifications to the Plan at submission stage, where these are likely to impact on European Sites.
- 1.6 This HRA report will be issued to Seaton Valley Community Council and the Steering Group to assist in supporting the submission of their Plan to the County Council and to assist the independent examination of the Plan in due course.

## 2. Habitats Regulations Assessment Requirements and Process

- 2.1 As a member of the European Union, the UK is bound by the terms of the Council Directive 79/409/EEC on the Conservation of Wild Birds (the Birds Directive) and the Council Directive 92/43/EEC on the conservation of natural habitats and wild flora and fauna (the Habitats Directive). These are implemented in the UK through the Conservation (Natural Habitats &c) Regulations which provide for the protection of areas of European importance for wildlife, in the form of Special Areas of Conservation (SACs), designated under the Habitats Directive, and Special Protection Areas (SPAs), designated under the Birds Directive. Collectively, these are termed European sites, and the overall network of European sites is termed Natura 2000.
- 2.2 The UK is also a signatory to the Convention on wetlands of international importance especially as waterfowl habitat, which was signed in Ramsar, Iran in 1971. Areas designated under this Convention are called Ramsar sites. Although Ramsar sites are not European sites as a matter of law, the Government has chosen as a matter of policy to protect and manage them by applying the same procedures to them. Consequently, Ramsar sites are treated as European sites in practice.
- 2.3 Articles 6(3) and 6(4) of the Habitats Directive states the following concerning European sites:

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

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

2.4 Regulation 105(1) of the Conservation of Habitats and Species Regulations 2017 states that

*“Where a land use plan -*

*(a) is likely to have a significant effect on a European site in Great Britain or a European offshore marine site (either alone or in combination with other plans or projects), and*

*(b) is not directly connected with or necessary to the management of the site, the plan-making authority for that plan shall, before the plan is given effect, make an appropriate assessment of the implications for the site in view of that site’s conservation objectives.”*

Regulation 106 of the Regulations states;

*“106.—(1) A qualifying body (i.e. Parish Council, or body designated as a Neighbourhood Forum) which submits a proposal for a Neighbourhood development plan must provide such information as the competent authority may reasonably require for the purposes of the assessment under regulation 105 or to enable it to determine whether that assessment is required.”*

2.5 The purpose of an HRA is to demonstrate that a land-use plan (or other plan or project) will not have any adverse effects on the integrity of any European sites. The assessment determines whether the plan would adversely affect the integrity of any European site in terms of its conservation objectives. Where adverse effects are identified alternative solutions should be identified and the plan modified to avoid any adverse effects. The Planning Authority can adopt the plan only after having ascertained that it will not adversely affect the integrity of a European site.

2.6 When preparing a suite of development plan documents, it is important that the HRA is undertaken in a way that is proportionate to the level of the document. The European Commission’s own guidance on the application of the test of likely significant effect accepts that policies in a plan that are no more than general policy statements or which express the general political will of an authority cannot be likely to have a significant effect on a site.<sup>1</sup>

2.7 This issue (for Local Plans) has also been addressed in the High Court case of Feeney, in which the judge stated that:

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<sup>1</sup> European Commission, 2000, *Managing Natura 2000 Sites: The provisions of Article 6 of the Habitats Directive 92/43/EEC* section 4.3.2 at [http://ec.europa.eu/environment/nature/natura2000/management/docs/art6/provision\\_of\\_art6\\_en.pdf](http://ec.europa.eu/environment/nature/natura2000/management/docs/art6/provision_of_art6_en.pdf)

*“A Local Plan is a high level strategic document and the detail falls to be worked out at a later stage. Each appropriate assessment must be commensurate to the relative precision of the plans at any particular stage and no more. There does have to be an appropriate assessment at the Local Plan stage, but such an assessment cannot do more than the level of detail of the strategy at that stage permits”<sup>2</sup>*

- 2.8 Therefore, there is a balance to be struck between being sufficiently rigorous in the assessment of potential effects, and undertaking a lot of unnecessary work or even causing a plan to fail the appropriate assessment test of ‘adverse effect on site integrity’ on the basis of risks that are more hypothetical than real, or risks that are too poorly defined at the Plan stage to be meaningfully assessed at this stage. Therefore some potential effects may be noted at this stage as requiring more detailed assessment at another stage of plan-making.
- 2.9 The Feeney case has also provided helpful guidance concerning the role of protective policies for European sites or protective wording within policies. It is clear that a general protective policy in itself cannot be regarded as adequate mitigation for any significant effects, because planning applications must be determined in accordance with the Development Plan. Therefore relying too heavily on a general protective policy can just create internal conflicts with other policies within the Plan.
- 2.10 However, an element of a policy that safeguards European sites or a policy qualifying a particular proposal so as to avoid likely significant effect has been found to be permissible<sup>3</sup>, as has adopting something in principle that will not actually happen if the protective condition or qualification is not being satisfied<sup>4</sup>. However, it is essential that such safeguards are sufficiently specific that they are not just general safeguards apply to a range of European sites and a range of effects.
- 2.11 In the case of Neighbourhood Plans, in many cases the plan will identify the acceptability criteria for developments in a plan area, relating to location, design or the composition of types of development; with the exact detail of the resulting developments agreed via the development management process (where they are determined in accordance with the Neighbourhood Plan, the Local Plan and the National Planning Policy Framework). In most cases, the neighbourhood plan will not identify additional housing or land allocations to the Local Plan, but will set acceptability criteria. Therefore, in many cases it would be appropriate to rely on a more detailed Habitats Regulations Assessment, with more detailed mitigation measures, at a later stage or lower level of plan making. This is particularly relevant within Impact Risk Zones for European sites where certain developments are likely, alone or in combination, to have a likely significant effect on the site without mitigation.

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<sup>2</sup> Sean Feeney v Oxford City Council and the Secretary of State CLG para 92 of the judgment dated 24 October 2011 Case No CO/3797/2011, Neutral Citation [2011] EWHC 2699 Admin <http://www.oxford.gov.uk/Library/Documents/Barton%20AAP/Barton%20AAP%20CD%207.20.1%20Appendix%20Feeney%20v%20OC%202011.pdf>

<sup>3</sup> Feeney; paragraphs 88, 90 and 92

<sup>4</sup> Feeney; paragraph 96

The Habitats Regulations Assessment Handbook states “*It may be possible and appropriate for the higher level plan to outline some aspects of mitigation measures, which must be provided at the later stage or lower level plan, in order to be able to conclude that there would be no adverse effects on site integrity*”.<sup>5</sup>

“*In order to ascertain that there would be no adverse effect on the integrity of a European site, a plan-making body may only rely on mitigation measures in a later stage or lower level of plan making if the following three criteria are all met:*

- a) The earlier stage or higher level plan assessment cannot reasonably predict any effect on a European site in a meaningful way; whereas*
- b) The later stage or lower level plan, which will identify more precisely the nature, timing, duration, scale or location of development, and thus its potential effects, will have the necessary flexibility over the exact nature, timing, duration, scale and location of the proposal to enable an adverse effect on site integrity to be avoided; and*
- c) The Habitats Regulations Assessment of the plan at the later stage or lower level is required as a matter of law or Government policy.”*

### **Assessment Methodology to meet the requirements of the Habitats Directive**

- 2.11 The Council has adopted the following assessment methodology to meet the requirements of the Habitats Directive:

#### Stage One – Screening

This comprises an initial analysis to determine whether the Seaton Valley Neighbourhood Plan is likely to have a significant effect on any European sites. The Seaton Valley Neighbourhood Plan will require appropriate assessment unless it is certain that it will not have a significant effect on any European sites.

- Stage 1A: Identification of European sites relevant to the assessment, and analysis of them in terms of reasons for designation, factors affecting their integrity and trends affecting them.
- Stage 1B: Identification of underlying trends that could affect the integrity of sites.
- Stage 1C: Analysis of the Seaton Valley Neighbourhood Plan objectives, proposals and proposed policies in terms of their possible adverse effects on the integrity of European sites, examination of options and alternatives to avoid or reduce these effects.
- Stage 1D: Identification of other plans and projects relevant to the assessment, to identify any likely in-combination effects. Article 6(3) of the Habitats Directive requires that plans and projects likely to have a significant effect on a European site *alone or in combination with other plans or projects* shall be subject to appropriate assessment.

The ruling of the Court of Justice of the European Union in case C-323/17 *People over Wind* in given in April 2018 has had a profound effect on the approach to screening. Prior to this ruling it was established practice to take account of

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<sup>5</sup> Tyldesley, D. and Chapman, C. (2013) *The Habitats Regulations Assessment Handbook* (February 2019 update) DTA Publications Ltd section F.10.1.5

mitigation measures included in a plan or project when determining if that plan or project was likely to have a significant effect. However, paragraph 40 of the ruling states that:

*Article 6(3)... must be interpreted as meaning that, in order to determine whether it is necessary to carry out, subsequently, an appropriate assessment of the implications, for a site concerning, of a plan or project, it is not appropriate, at the screening stage, to take account of measures intended to avoid or reduce the harmful effects of the plan or project on that site'*

Accordingly, the benefit of measures intended to avoid or reduce the harmful effects of a plan or project must be disregarded when determining whether it is likely to have a significant effect on a European site.

Where required:

Stage Two – Appropriate Assessment

Determination of whether any proposals or policies in the Neighbourhood Plan identified at the screening stage as having a likely significant effect would have an adverse effect on the integrity of any European sites, in view of the conservation objectives for those sites and the nature of the likely significant effect that has been identified. Modifications to those proposals or policies are identified to avoid any adverse effects on site integrity.

If mitigation is not possible and adverse effects on site integrity remain, the process must proceed to Stage Three

Stage Three – Alternative Solutions

The identification of alternative solutions to the relevant proposals or policies so as to avoid adverse effects on the integrity of European sites. The plan must then be modified in light of these findings.

Stage Four – Imperative Reasons of Overriding Public Interest and Compensatory Measures

If a plan or project has adverse effects on the integrity of a European site which cannot be avoided or mitigated for and there are no alternative solutions, consideration must be given to whether there are imperative reasons of overriding public interest for proceeding with the plan or project. This stage involves central Government and must be notified to the European Commission. If there are imperative reasons of overriding public interest, compensatory measures must be identified to maintain and enhance the overall coherence of the Natura 2000 network. This will only be in exceptional circumstances and must be supported by strong justification.



### **3. Stage 1A: Identification of European sites**

- 3.1 The following European sites are wholly or partly within 10km of the plan boundary or are considered to have the potential to be affected by the Plan, and so are within the scope of the Habitats Regulations Assessment:

#### Special Protection Areas

- Northumbria Coast
- Northumberland Marine

#### Ramsar Sites

- Northumbria Coast

## Site Analysis

- 3.2 This stage of the assessment details the reasons that relevant European sites have been designated (the qualifying features), the objectives intended to be achieved by designating and managing the sites, and the environmental conditions that are key to maintaining the integrity of the site. Guidance from the European Commission states that ‘a site can be described as having a high degree of integrity where the inherent potential for meeting site conservation objectives is realised, the capacity for self-repair and self-renewal under dynamic conditions is maintained, and a minimum of external management support is required’ (EC, 2000; para 4.6.3)

An asterisk \* beside a qualifying feature indicates that the feature is listed as a priority habitat on Annex I of the Habitats Directive.

<b>Site</b>	<b>Qualifying Features</b>	<b>Conservation Objectives</b>	<b>Key Environmental Conditions to Support Site Integrity</b>
Northumbria Coast SPA	Internationally important breeding populations of little tern and arctic tern Internationally important wintering populations of purple sandpiper and turnstone	To maintain in (or restore to) favourable condition the sand dunes for the breeding populations of little tern and arctic 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)
Northumberland Marine SPA	Internationally important breeding populations of Annex 1 species: Sandwich tern	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;	Not available yet

Site	Qualifying Features	Conservation Objectives	Key Environmental Conditions to Support Site Integrity
	Roseate tern Common tern Arctic tern Little tern Common guillemot Atlantic puffin An internationally important seabird assemblage of over 20,000 birds	<ul style="list-style-type: none"> <li>• The extent and distribution of the habitats of the qualifying features</li> <li>• The structure and function of the habitats of the qualifying features</li> <li>• The supporting processes on which the habitats of the qualifying features rely</li> <li>• The population of each of the qualifying features, and,</li> </ul> The distribution of the qualifying features within the site.	
Northumbria Coast Ramsar Site	Internationally important breeding population of little tern Internationally important wintering populations of purple sandpiper and turnstone	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 maintenance of sparsely vegetated dunes for nesting (little tern). extent and quality of rocky shore feeding and roosting habitat (purple sandpiper and turnstone)

## 4. Stage 1B: Analysis of Trends

4.1 Trends are influences on a European site other than other plans and projects, which have influenced it and are likely to continue to influence it. It is important that relevant trends are considered alongside the plan that is subject to Habitats Regulations Assessment and other plans and projects, in order to identify the factors which, in combination, may be affecting a European site.

4.2 The following trends have been identified as being relevant to this Habitats Regulations Assessment:

- Tourism and recreation

### **Tourism and Recreation**

4.3 Tourism is concentrated in certain areas of the county, especially the coast. Disturbance can be a significant impact arising from coastal recreation, with potential adverse impacts on nesting and feeding tern species, feeding and roosting migratory and winter waders and wildfowl and on fragile dune communities. Dogs, especially off-lead animals, increase the effect of casual disturbance of birds by walkers.

4.4 European sites at particular risk of disturbance impacts include the Northumbria Coast SPA and Ramsar Site.

4.5 Improvements in treatment of sewage arising from coastal settlements in order to meet Urban Waste Water Treatment Directive obligations will help to ensure that increasing visitor numbers do not contribute to the eutrophication of intertidal and subtidal habitats.

### **Large Scale Development**

4.6 Development of land is occurring at a comparatively modest pace in Northumberland, with the bulk of housing and industrial development occurring in and adjacent to the settlements of south-east Northumberland, on the periphery of the Tyneside conurbation. New development causes a range of impacts that can affect European sites, including increased or changing patterns of air pollution from changing or increasing vehicle uses, and increases in water demand and in waste arisings. Urban expansion can also cause loss of or increased disturbance to land which is used as high tide and night time roosts by bird species which are key features of the coastal SPAs, and it can increase disturbance within these SPAs, for example through increased recreational use of the intertidal zone and through light pollution. Recreational disturbance such as dog walking can be a particular problem when new residential development occurs close to the Northumbria Coast SPA and Ramsar Site; feeding opportunities for turnstone and purple sandpiper are already restricted by the tides and the limited daylight of winter, so lost feeding time and increased energy use evading perceived predators could be significant. Some high tide and night time roost sites used by these species are known to occur in close proximity to development, but overall knowledge of the location of roost sites is incomplete. There is currently a high degree of uncertainty about the breeding

locations of the golden plover that winter on the Northumberland Coast; however, adverse effects on the wintering populations could affect the integrity of the North Pennines Moors SPA or other SPAs that they breed in.

## **Climate Change**

- 4.7 Changes in climate arising from increasing levels of atmospheric CO<sub>2</sub> are very complex and difficult to predict. However, increasingly warm dry summers and mild, stormy winters along with rising sea levels seem to be the most likely trends. Possible impacts on European sites include the following:
- coastal squeeze, as habitats such as saltmarshes and sand dunes are caught in a decreasing amount of space between rising sea levels on their seaward side and human land uses on their landward side. This is likely to affect all coastal European sites, but effects will be felt first and most severely on European sites with intertidal habitats and dunes, including the Northumbria Coast SPA and Ramsar Site.
  - distribution patterns of many species affected by shifts in their 'climate space' (the geographic area which has the appropriate climate for that species) which may have impacts on coastal sites.
  - increasing rates of colonisation by new species, including pests and diseases
  - higher summer water temperatures, with consequent decrease in levels of dissolved oxygen and increases in levels of primary productivity and decay processes.
- 4.8 Measures likely to assist in reducing the impacts of or in adapting to climate change include habitat restoration to improve 'ecosystem services', and land use change to facilitate the movement of communities and species. The area of functional floodplain in Northumberland has been greatly reduced over a long time period as flood defences have been put in place for settlements and farmland; however, increasingly severe winter storms will increase the need for it. Coastal realignment (the setting back of coastal defences) has the potential to allow coastal habitats such as saltmarsh to migrate landwards rather than being lost to coastal squeeze; projects are currently underway at Alnmouth and Goswick through the Northumberland Foreshores Project which will demonstrate the potential of this approach, although again these are of very limited scale compared to the problem.
- 4.9 The issue of facilitating the movement of communities and species in response to movements in their climate space is complex, as they vary greatly in their ability to make such movements and their requirements that they have in order to do so; accordingly such changes are likely to be chaotic rather than simple, with more adaptable species and less specialist communities faring much better than more demanding and specialist ones. It is unclear whether beneficial land management practices can be initiated on a significant enough scale to assist in this process; however, those activities that are most likely to have a beneficial effect in this respect include restoring existing habitats to good condition to maximise their resilience, and increasing ecological connectivity by increasing the overall extent of semi-natural vegetation in the wider countryside; reinforcing and expanding features that act as links and corridors such as watercourses and their associated riparian habitats; increasing the density of networks of habitats such as wetlands, semi-

natural grasslands and native woodlands; and managing farmland in a way that integrates food production and wildlife conservation. This requires that nature conservation is planned and implemented at a landscape scale, rather than on the traditional site-by-site basis.

## **5. Stage 1C: Analysis of proposals and policies in the Seaton Valley Neighbourhood Plan - Identification of Likely Significant Effects**

- 5.1 The objectives, policies and community actions contained within the Seaton Valley Neighbourhood Plan have been evaluated to identify where there could be a likely significant effect on the interest features of European sites.

Paragraph 177 of the NPPF states that the presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.

- 5.2 The following European sites are within the boundary of the Plan.

### Special Protection Areas

- Northumbria Coast
- Northumberland Marine

### Ramsar Sites

- Northumbria Coast

### 5.3 Current Condition of Designated Sites and Threats to Site Integrity

Site	Qualifying Features	Current Condition of Component SSSIs within 10km of the Plan boundary	Threats to Site Integrity
Northumbria Coast SPA/Ramsar Site	Internationally important breeding populations of little tern and arctic tern Internationally important wintering populations of purple sandpiper and turnstone	100% of the underlying SSSI units are assessed as being in favourable condition.	All features –significant increase in human disturbance or that caused by off-lead dogs. Loss of sparsely vegetated dunes for nesting (little tern). Changes to the extent and quality of rocky shore feeding and roosting habitat (purple sandpiper and turnstone)
Northumberland Marine SPA	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	Not available yet	Not available yet

### **Assessment of the Plan's Objectives:**

- 5.4 Vision: "By 2036 green and other open spaces which are important to the character of the area and the local community will be protected for the benefit of future generations."

This is an aspiration and an environmental protection policy which cannot have a conceivable effect on a European Site.

### **Assessment of the Plan Policies:**

- 5.5 POLICY SV1: LOCAL GREEN SPACE

This is an environmental protection policy and cannot have a conceivable effect on a European Site. It can therefore be screened out.

- 5.6 POLICY SV2: PROTECTED OPEN SPACE

This is an environmental protection policy and cannot have a conceivable effect on a European Site. It can therefore be screened out.



## **6. Conclusion.**

- 6.1 This is a record of the determination as to whether the Seaton Valley Neighbourhood Plan Pre-Submission Draft September 2020 is likely to have a significant effect on any European sites, as required under Regulation 106 of the Conservation of Habitats and Species Regulations 2017 as amended.
- 6.2 The Neighbourhood Plan contains two policies, which protect greenspaces and community open spaces within the plan area. This policy will not facilitate new development and therefore cannot cause a significant effect on any European sites, alone or in combination with any other plans or policies.
- 6.3 In accordance with Regulation 106 of the Conservation of Habitats and Species Regulations 2017 as amended, Northumberland County Council concludes that the Seaton Valley Neighbourhood Plan Pre-Submission Draft September 2020 is unlikely to have a significant effect on any European sites and therefore it is unnecessary to undertake an appropriate assessment prior to the adoption of the Plan.
- 6.4 The above conclusion is supported by Natural England with this being confirmed in a letter dated 25<sup>th</sup> November 2020 (attached as Appendix 1).

ADF  
25.11.2020

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## APPENDIX 1. Confirmation of The Opinion of Natural England on the Conclusion of the HRA.

Date: 25 November 2020  
Our ref: 335133  
Your ref: Seaton Valley Neighbourhood Plan HRA



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**BY EMAIL ONLY**

Dear Ms. Deary Francis

**Seaton Valley Neighbourhood Plan Habitat Regulations Assessment Report, October 2020**

Thank you for your consultation on the above dated 23 November 2020

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

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

**Natural England agrees with the conclusions of the Seaton Valley Neighbourhood Plan Habitat Regulations Assessment Report, October 2020, and does not have any further comments on this draft neighbourhood plan.**

However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan.

For any further consultations on your plan, please contact: [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours sincerely

Nick Lightfoot  
Northumbria Area Team