

# Habitats Regulations Assessment

by Dorset Council

Charmouth Neighbourhood Plan

December 2019

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## 1. INTRODUCTION

This document provides a Habitats Regulations Assessment (HRA) of the Charmouth Neighbourhood Plan.

The main purpose of the HRA is to determine whether the Charmouth Neighbourhood Plan is likely to adversely affect the integrity of a European Site<sup>1</sup>, which are designated areas of exceptional ecological importance.

This report explains the legal background to HRA before exploring the likely significant effects of the Charmouth Neighbourhood Plan on European wildlife sites at the HRA screening stage. An Appropriate Assessment is presented, which explores whether the Charmouth Neighbourhood Plan may affect the integrity of a European Site.

### LEGISLATIVE BACKGROUND TO HABITATS REGULATIONS ASSESSMENT

EU Directive (92/43/EEC) on the Conservation of Habitats and of Wild Fauna and Flora ('the Habitats Directive') led to the establishment of a network of 'European sites', collectively known as Natura 2000, which are areas of exceptional importance with respect to rare, endangered or vulnerable natural habitats or species. European Sites consist of the following ecological designations:

- Special Protection Areas (SPAs): Classified under the EU Directive (79/409/EEC) on the Conservation of Wild Birds ('the Birds Directive'), with the objective of protecting and managing areas which are important for rare and vulnerable birds as they are important grounds for breeding, feeding, wintering or migration; and
- Special Areas of Conservation (SACs): Classified under the Habitats Directive, these areas provide rare and vulnerable animals, plants and habitats with increased protection and management.

The National Planning Policy Framework (paragraph 176) states that the following sites should be afforded the same protection as European Sites:

- Potential Special Protection Areas (pSPA): Potential Special Protection Areas, are sites on which the Government has initiated public consultation on the scientific case for designation as a Special Protection Area;

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<sup>1</sup> For the purposes of this report, a 'European Site' includes Special Areas of Conservation, Special Protection Areas and Ramsar Sites, (including possible, potential and proposed sites)

- Possible Special Areas of Conservation (pSAC): Possible Special Areas of Conservation are sites on which Government has initiated public consultation on the scientific case for designation as a candidate Special Area of Conservation;
- Ramsar sites (and proposed Ramsar sites): Wetlands of international importance designated under the 1971 Ramsar Convention, and proposed Ramsar sites are sites on which Government has initiated public consultation on the scientific case for a Ramsar site; and
- Sites identified, or required, as compensatory measures for adverse effects on European sites and Ramsar sites: Sites which are included as compensation in schemes to mitigate adverse impacts upon European and Ramsar sites.

The requirement to undertake an assessment of plans or projects that are likely to have an effect upon European sites is given in Article 6(3) of the Habitats Directive.

The Habitats Directive is transposed into UK law through the Conservation of Habitats and Species Regulations 2017 ('the Habitats Regulations'). Regulation 61 of the Habitats Regulations implements Article 6(3) of the Habitats Directive by requiring the competent authority to complete an appropriate assessment of the implications of the plan or project for the European site in view of the site's conservation objectives before deciding to undertake a plan or project which is likely to have a significant effect on a European site.

## 2. HRA SCREENING

The first stage of the HRA process is the screening stage, the purpose of which is to determine whether the plan is likely to result in a significant effect upon a European Site.

In order to determine this, there is a requirement to identify those European Sites which may be affected by the Charmouth Neighbourhood Plan. The European Sites considered in this HRA are those which may be linked to the Charmouth Neighbourhood Plan through a known 'pathway', defined as the method by which a change due to the neighbourhood plan may lead to an effect on a European Site (Figure 3.1).

*Figure 3.1: European sites which may be affected by the Charmouth Neighbourhood Plan*

European site	Designation	Approx. distance from plan area
Sidmouth to West Bay	SAC	Occupies an area on the southern part of the plan area.
Lyme Bay and Torbay	SAC	Adjacent to the southern boundary of the plan area.
Chesil and the Fleet	SAC	9.5km to the southeast
West Dorset Alder Woods	SAC	13.4km to the northeast
Chesil Beach and the Fleet	SPA and Ramsar	21.0km to the southeast
River Axe	SAC	8.9km to the west
Brackets Coppice	SAC	18.2km to the northeast
Beer Quarry and Caves	SAC	14.1km to the west

Further details of these European Sites and the pathways (highlighted in red text) which may cause the Charmouth Neighbourhood Plan to result in a likely significant effect upon a European Site are shown in Figure 3.2.

Figure 3.2: Characteristics of the European sites which may be affected by the Charmouth Neighbourhood Plan and pathways of impact

Qualifying features	Conservation Objectives	Pathways of impact
<b>Sidmouth to West Bay SAC</b>		
<p><b>Annex 1 habitats:</b>                      Vegetated sea cliffs of the Atlantic and Baltic Coasts                      Tilio-Acerion forests of slopes, screes and ravines</p> <p><b>Annex 1 habitats (present as a qualifying feature but not a primary reason for selection of this site):</b>                      Annual vegetation of drift lines</p>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;</p> <ul style="list-style-type: none"> <li>• The extent and distribution of qualifying natural habitats;</li> <li>• The structure and function (including typical species) of qualifying natural habitats; and</li> <li>• The supporting processes on which qualifying natural habitats rely.</li> </ul>	<ul style="list-style-type: none"> <li>• Invasive non-native species;</li> <li>• <b>Pollution to groundwater (point sources and diffuse sources);</b></li> <li>• <b>Other human intrusions and disturbances;</b></li> <li>• Interspecific floral relations;</li> <li>• <b>Other urbanisation, industrial and similar activities.</b></li> </ul>
<b>Lyme Bay and Torbay SAC</b>		
<p><b>Annex 1 habitats:</b>                      Reefs                      Submerged or partially submerged sea caves</p>	<p>Subject to natural change, the integrity of the site is maintained or restored as appropriate, and that the site contributes to achieving the Favourable Conservation Status of its qualifying features, by maintaining or restoring:</p> <ul style="list-style-type: none"> <li>• the extent and distribution of qualifying natural habitats and habitats of the qualifying species;</li> <li>• the structure and function (including typical species) of qualifying natural habitats;</li> <li>• the structure and function of the habitats of qualifying species;</li> <li>• the supporting processes on which qualifying natural habitats and the habitats of qualifying species rely;</li> <li>• the populations of qualifying species; and</li> <li>• the distribution of qualifying species within the site.</li> </ul>	<ul style="list-style-type: none"> <li>• Fishing and harvesting aquatic resources.</li> </ul>
<b>Chesil and the Fleet SAC</b>		
<p><b>Annex 1 habitats:</b>                      Coastal lagoons;</p>	<p>Subject to natural change, maintain the <b>lagoon</b> in favourable condition, in particular:</p>	<ul style="list-style-type: none"> <li>• Physical loss;</li> <li>• <b>Physical damage;</b></li> </ul>

<p>Annual vegetation of drift lines; Perennial vegetation of stony banks; Mediterranean and thermo-Atlantic halophilous scrubs (Sarcocornetea fruticosi)</p> <p><b>Annex 1 habitats (present as a qualifying feature but not a primary reason for selection of this site):</b> Atlantic salt meadows (Glauco-Puccinellietalia maritimae)</p>	<ul style="list-style-type: none"> <li>• Seagrass bed communities;</li> <li>• Tide-swept communities;</li> <li>• Subtidal coarse sediment (gravel, cobbles, pebbles) communities;</li> <li>• Intertidal sediment communities; and</li> <li>• Shingle spring line communities.</li> </ul> <p>Subject to natural change, maintain the <b>Annual vegetation of drift lines</b> in favourable condition, in particular:</p> <ul style="list-style-type: none"> <li>• Beta vulgaris maritima (sea beet) - Atriplex (orache) communities; and</li> <li>• Honkenya peploides (sea sandwort) - Cakile maritima (sea rocket) communities.</li> </ul> <p>Subject to natural change, maintain the <b>Mediterranean and thermo-Atlantic halophilous scrub</b> in favourable condition, in particular:</p> <ul style="list-style-type: none"> <li>• Shrubby sea-blite (Suaeda vera) communities.</li> </ul>	<ul style="list-style-type: none"> <li>• Toxic contamination;</li> <li>• Non-toxic contamination;</li> <li>• Biological disturbance.</li> </ul>
<p><b>Chesil Beach and the Fleet SPA</b></p>		
<p>Little tern <i>Sternula albifrons</i> (Breeding) ; Wigeon <i>Mareca penelope</i> (Non-breeding); Dark-bellied Brent Goose <i>Branta bernicla bernicla</i>.</p>	<p>Subject to natural change, to maintain in favourable condition the habitats for the internationally important populations of the regularly occurring Annex 1 bird species, under the Birds Directive, with particular reference to:</p> <ul style="list-style-type: none"> <li>• Lagoon waters.</li> </ul> <p>Subject to natural change, to maintain in favourable condition the habitats for the internationally important populations of regularly occurring migratory bird species, under the Birds Directive, with particular reference to:</p> <ul style="list-style-type: none"> <li>• Intertidal sediment communities; and</li> <li>• Seagrass bed communities.</li> </ul>	<ul style="list-style-type: none"> <li>• Physical loss;</li> <li>• Physical damage;</li> <li>• <b>Non-physical disturbance;</b></li> <li>• Toxic contamination;</li> <li>• Non-toxic contamination;</li> <li>• Biological disturbance.</li> </ul>
<p><b>Chesil Beach and the Fleet Ramsar</b></p>		
<p>The information sheet on the Ramsar Wetland lists the following criterion as justification of the designation: <b>Ramsar criterion 1-</b> The Fleet is an outstanding example of rare lagoon habitat and is the largest of its kind in the UK. In Europe</p>	<p>Natural England considers the Conservation Advice packages for the overlapping European Sites to be sufficient to support the management of the Ramsar interests at this site.</p>	<ul style="list-style-type: none"> <li>• No adverse factor categories identified.</li> </ul>

<p>lagoons are classified as a priority habitat by the EC Habitats and Species Directive. The site also supports rare saltmarsh habitats.</p> <p><b>Ramsar criterion 2-</b> The Fleet supports 15 specialist lagoonal species and five nationally scarce wetland plants as well as ten nationally scarce wetland animals. Chesil Bank is one of the most important UK sites for shingle habitats and species.</p> <p><b>Ramsar criterion 3 -</b> The site is the largest barrier-built saline lagoon in the UK and has the greatest diversity of habitats and of biota.</p> <p><b>Ramsar criterion 4 -</b> The site is important for a number of species at a critical stage in their life cycle including post-larval and juvenile bass <i>Dicentrarchus labrax</i>.</p> <p><b>Ramsar criterion 6 -</b> Species/populations occurring at levels of international importance including Mute Swan <i>Cygnus olor</i> and Dark-bellied brent goose, <i>Branta bernicla</i></p> <p><b>Ramsar criterion 8 -</b> The site is important as a nursery for bass <i>Dicentrarchus labrax</i>.</p>		
<p><b>West Dorset Alder Woods SAC</b></p>		
<p><b>Annex 1 habitats:</b> Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (<i>Alno-Padion</i>, <i>Alnion incanae</i>, <i>Salicion albae</i>)</p> <p><b>Annex 1 habitats (present as a qualifying feature but not a primary reason for selection of this site):</b> <i>Molinia</i> meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinion caeruleae</i>) Old acidophilous oak woods with <i>Quercus robur</i> on sandy plains</p> <p><b>Annex 2 species:</b> Marsh fritillary butterfly <i>Euphydryas</i> (<i>Eurodryas</i>, <i>Hypodryas</i>) <i>aurinia</i></p> <p><b>Annex 2 species (present as a qualifying feature but not a</b></p>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;</p> <ul style="list-style-type: none"> <li>• The extent and distribution of qualifying natural habitats and habitats of qualifying species;</li> <li>• The structure and function (including typical species) of qualifying natural habitats;</li> <li>• The structure and function of the habitats of qualifying species;</li> <li>• The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely;</li> <li>• The populations of qualifying species; and</li> <li>• The distribution of qualifying species within the site.</li> </ul>	<ul style="list-style-type: none"> <li>• Invasive non-native species;</li> <li>• Problematic native species;</li> <li>• Pollution to groundwater (point sources and diffuse sources);</li> <li>• Grazing;</li> <li>• Forest and Plantation management &amp; use.</li> </ul>

<p><b>primary reason for selection of this site):</b> Great crested newt <i>Triturus cristatus</i></p>		
<p><b>River Axe SAC</b></p>		
<p><b>Annex 1 habitat:</b> Water courses of plain to montane levels with the Ranunculion fluitantis and Callitriche-Batrachion vegetation</p> <p><b>Annex 2 species:</b> Sea lamprey <i>Petromyzon marinus</i>; Brook lamprey <i>Lampetra planeri</i>; and Bullhead <i>Cottus gobio</i></p>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring:</p> <ul style="list-style-type: none"> <li>• The extent and distribution of qualifying natural habitats and habitats of qualifying species;</li> <li>• The structure and function (including typical species) of qualifying natural habitats;</li> <li>• The structure and function of the habitats of qualifying species;</li> <li>• The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely;</li> <li>• The populations of qualifying species; and</li> <li>• The distribution of qualifying species within the site.</li> </ul>	<ul style="list-style-type: none"> <li>• Pollution to groundwater (point sources and diffuse sources);</li> <li>• Human induced changes in hydraulic conditions;</li> <li>• Invasive non-native species.</li> </ul>
<p><b>Brackets Coppice SAC</b></p>		
<p><b>Annex 1 habitats (present as a qualifying feature but not a primary reason for selection of this site):</b> Molinia meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinia caerulea</i>)</p> <p><b>Annex 2 species:</b> Bechstein's bat <i>Myotis bechsteinii</i></p>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;</p> <ul style="list-style-type: none"> <li>• The extent and distribution of qualifying natural habitats and habitats of qualifying species;</li> <li>• The structure and function (including typical species) of qualifying natural habitats;</li> <li>• The structure and function of the habitats of qualifying species;</li> <li>• The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely;</li> <li>• The populations of qualifying species; and</li> <li>• The distribution of qualifying species within the site.</li> </ul>	<ul style="list-style-type: none"> <li>• Grazing;</li> <li>• Problematic native species;</li> <li>• Air pollution, air-borne pollutants.</li> </ul>
<p><b>Beer Quarry and Caves SAC</b></p>		
<p><b>Annex 2 species:</b> Bechstein's bat <i>Myotis bechsteinii</i></p>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable</p>	<ul style="list-style-type: none"> <li>• Other human intrusions and disturbances;</li> </ul>

<p><b>Annex 2 species (present as a qualifying feature but not a primary reason for selection of this site):</b>  <i>Lesser horseshoe bat Rhinolophus hipposideros; Greater horseshoe bat Rhinolophus ferrumequinum</i></p>	<p>Conservation Status of its Qualifying Features, by maintaining or restoring;</p> <ul style="list-style-type: none"> <li>• The extent and distribution of the habitats of qualifying species;</li> <li>• The structure and function of the habitats of qualifying species;</li> <li>• The supporting processes on which the habitats of qualifying species rely;</li> <li>• The populations of qualifying species; and</li> <li>• The distribution of qualifying species within the site.</li> </ul>	<ul style="list-style-type: none"> <li>• Other urbanisation, industrial and similar activities;</li> <li>• Biocenotic evolution, succession;</li> <li>• Other ecosystem modifications.</li> </ul>
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The initial screening resulted in the following European sites being discounted from further consideration, as no pathways were identified:

- Lyme Bay and Torbay
- West Dorset Alder Woods
- River Axe
- Brackets Coppice
- Beer Quarry and Caves

Whilst the Lyme Bay and Torbay SAC is adjacent and to the south of the plan area, the scope of the Charmouth Neighbourhood Plan is such that the main threat to the European Site, which is fishing and the harvesting of aquatic resources, is unlikely to be appreciably affected. Likely significant effects upon the West Dorset Alder Woods, River Axe, Brackets Coppice and Beer Quarry and Caves European sites are not expected given the distance of these sites from the plan area, the nature of the threats to these European sites, and the scale and type of development likely to come forward through the Charmouth Neighbourhood Plan.

Following the initial screening shown in Figure 3.2, a more detailed assessment of the likely significant effects which may result upon the European Sites was undertaken (see Figure 3.3). This assessment considered the potential impact pathway in more detail, taking into account other previous investigations. It discounted some of these pathways for the reasons given in Figure 3.3.

However, a likely significant effect upon a European Site from the following three pathways could not be confidently ruled out:

- Pollution to groundwater (point sources and diffuse sources) at the Sidmouth to West Bay SAC;
- Human intrusions and disturbances at the Sidmouth to West Bay SAC; and
- urbanisation, industrial and similar activities at the Sidmouth to West Bay SAC.

Therefore, a further more detailed assessment, known as an 'Appropriate Assessment', is necessary to confirm whether there would be adverse effects on the integrity of a European Site.

Figure 3.3: A table considering the potential pathways of impact which may result in a likely significant impact upon a European Site

European Site	Pathway of impact	Assessment of the likely significant effect (LSE)	LSE?
Sidmouth to West Bay SAC	Pollution to groundwater (point sources and diffuse sources)	The Sidmouth to West Bay SAC occupies the coastal areas on the southern section of the plan area. The primary reasons for the designation of this European site are the vegetated sea cliffs on the Atlantic and Baltic coasts, and the Tilio-Acerion forests of slopes, screes and ravines. In addition, the site is also designated on the basis of the annual vegetation of drift lines which typically occur on deposits of shingle lying at or above mean high-water spring tides.	✓
	Other human intrusions and disturbances	The threats to the Sidmouth to West Bay SAC include groundwater pollution, human intrusion and disturbance, and urbanisation, industrial and similar activities. Development plans, such as the Charmouth Neighbourhood Plan, have the potential to contribute to these threats by influencing the amount and type of new development.	✓
	Other urbanisation, industrial and similar activities		✓
Chesil and the Fleet SAC	Physical damage	The Chesil and the Fleet SAC, located 9.5km from plan area, is vulnerable to physical damage as a result of recreational pressure, associated with activities such as walking and fishing, causing damage to habitats including the Annual vegetation of drift lines, Perennial vegetation of stony banks, and Mediterranean and thermo-Atlantic halophilous scrubs ( <i>Sarcocornetea fruticosi</i> ). The distance of the European site from the Charmouth Neighbourhood Plan area is considered too great for regular use by large numbers of people from Charmouth. Therefore, any increase in population associated with development in Charmouth is likely to be small and this impact pathway can be screened out.	✗
Chesil Beach and the Fleet SPA	Non-physical disturbance	The Chesil Beach and the Fleet SPA site, located 21km from plan area, is sensitive to disturbance, generally from activities such as bird watching, fishing, boating, walking, to bird species during the breeding season including the Little Tern ( <i>sterna albifrons</i> ), Common Tern ( <i>sterna hirundo</i> ) and Ringed Plover ( <i>charadive histicula</i> ). The disturbance results in these birds expending energy unnecessarily, not feeding properly, and not tending to eggs or nestlings if the disturbance is close to the nests. This affects the condition of the birds and reduces the survival rate of the eggs and nestlings, ultimately compromising the survival of the birds. Disturbance over the Winter is also a concern due to the birds expending energy combined with the scarcity of food. The distance of the European site from the Charmouth Neighbourhood Plan area is considered too great for regular use by large numbers of people from Charmouth. Therefore, any increase in population associated with development in Charmouth is likely to be small and this impact pathway can be screened out.	✗

### 3. APPROPRIATE ASSESSMENT

The HRA screening concluded that there were likely significant effects from the Charmouth Neighbourhood Plan upon the Sidmouth to West Bay SAC. As a result, an Appropriate Assessment is required to determine whether the Charmouth Neighbourhood Plan would result in adverse effects on the integrity of a European Site. Measures to prevent or avoid adverse significant effects may be taken into account or recommended at the Appropriate Assessment stage, where necessary.

The primary reasons for the designation of the Sidmouth to West Bay SAC, which occupies the coastal areas on the southern part of the plan area, are the vegetated sea cliffs on the Atlantic and Baltic coasts, and the Tilio-Acerion forests of slopes, screes and ravines. The vegetated sea cliffs of the Atlantic and Baltic coast habitat form as a result of the highly unstable soft cliff coastline formed of mudstones, clays and silty limestones which are subject to mudslides and landslips. The vegetation includes pioneer communities on recent slips, calcareous grassland and scrub on detached chalk blocks and extensive self-sown woodland dominated by ash (*Fraxinus excelsior*) or sycamore (*Acer pseudoplatanus*). The Tilio-Acerion forests are associated with the rocky slope habitats which form as a result of active landslipping, which is known to occur in the coastal areas of Charmouth, particularly those areas of the southwest of the plan area within the Black Ven landslide complex.

In addition to the primary reasons for designation, the site is also designated on the basis of the annual vegetation of drift lines which typically occur on deposits of shingle lying at or above mean high-water spring tides. The types of deposits involved are generally at the lower end of the size range of shingle (2-200mm diameter). These shingle deposits occur as fringing beaches that are subject to periodic displacement or overtopping by high tides and storms, meaning that it may form only sparse cover and be ephemeral and composed of annual or short-lived perennial species<sup>2</sup>.

The HRA screening concluded that there were likely significant effects from the Charmouth Neighbourhood Plan upon the Sidmouth to West Bay SAC as a result of the following three pathways:

- Pollution to groundwater (point sources and diffuse sources);
- Human intrusions and disturbances; and
- Urbanisation, industrial and similar activities.

The Charmouth Neighbourhood Plan does not allocate land for housing and intends to deliver new housing to meet local needs. It is considered unlikely that this level of housing will result in a likely significant impact upon the Sidmouth to West Bay SAC.

However, the policies within the Charmouth Neighbourhood Plan which could link to the impact pathways listed above are shown in Figure 3.4, along with the reasons for the likely significant effect and the mitigation which is required to address these issues.

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<sup>2</sup> <http://jncc.defra.gov.uk/protectedsites/sacselection/habitat.asp?FeatureIntCode=H1210>

Figure 3.4: A table showing the policies which may result in a likely significant effect and the proposed mitigation to address these effects.

Policy	Reason for likely significant effect	Proposed mitigation
AA1: Important Community Assets and Amenities	Policy allows community assets and amenities to be modernised and adapted, and to be 'lost' if they are not viable. This includes the Heritage Coast Centre which is adjacent to the European site. Changes to community buildings may increase the threats to the Sidmouth to West Bay SAC from human intrusion and disturbance, and urbanisation.	The following wording should be added to policy AA1: "Development associated with community assets must not adverse effect the integrity of Sidmouth to West Bay Special Area of Conservation." In addition, it may be helpful to include an explanation of the potential effects of community development on the Sidmouth to West Bay European site in the text prior to the policy.
NE3: Biodiversity and Natural Habitats	The policy does not prevent impacts upon the integrity of European wildlife sites. The Charmouth Neighbourhood Plan has the potential to contribute to these threats by influencing the amount and type of new development.	The following wording should be added to policy NE3: "European and International wildlife sites will be safeguarded from development that could adversely affect them." The preamble to the policy may also provide some background to the European sites and the importance of protecting them.
BET2: Economic Development & Premises for New Businesses	The policy supports the creation, conversion, or expansion of premises for small scale A class uses and B1 workshops. This may contribute to the threats to the Sidmouth to West Bay SAC from pollution to groundwater and industrial activities.	The following wording should be added to policy BET2: "Economic development must not adversely effect the integrity of the Sidmouth to West Bay Special Area of Conservation." It may be also be helpful to include an explanation of the potential effects of economic development on the Sidmouth to West Bay European site in the preamble to the policy. The term "groundwater pollution" should also be added to policy NE6: Pollution to ensure that this threat to the Sidmouth to West Bay European site is addressed.
GA1: Pedestrian Routes	The policy enables pedestrian routes to be enhanced where practical, including those footpaths within the Sidmouth to West Bay SAC. This is likely to contribute to human intrusions and disturbances within the European site.	The following wording should be added to policy GA1: "The enhancement of pedestrian routes must avoid adverse effects upon the integrity of the Sidmouth to West Bay Special Area of Conservation." The preamble to the policy may also explain the likely impacts of enhancing pedestrian routes upon the Sidmouth to West Bay European site.
GA2: Car Parking	Building on the car parks in Charmouth is permitted in exceptional circumstances. This includes the Sea Front, Foreshore and Beach Car Parks, which are adjacent to the Sidmouth to West Bay SAC. Development in this area has the potential to affect the European site.	"Development on public/visitor car parks must not adversely effect the integrity of the Sidmouth to West Bay Special Area of Conservation". The preamble to the policy may explain the proximity of the Sea Front, Foreshore and Beach Car Parks to the European site.
CD1: Coastal Defences	This policy supports engineering initiatives to significantly improve existing coastal defences or create new defences as soon as possible. The Sidmouth to West Bay European site relies on natural processes to meet their conservation objectives and maintain the integrity of the habitats. This form of urbanisation is likely to significantly alter the local coastal processes.	The following wording should be added to policy CD1: "the development of coastal defences must avoid adverse effects upon the integrity of the Sidmouth to West Bay Special Area of Conservation." The text prior to the policy may also explain the reliance of the Sidmouth to West Bay European site upon natural coastal processes.

## 4. CONCLUSION

The HRA screening exercise concluded that there were likely significant as a result of the Charmouth Neighbourhood Plan due to Pollution to groundwater (point sources and diffuse sources), human intrusions and disturbances, and urbanisation, industrial and similar activities at the Sidmouth to West Bay SAC.

The Appropriate Assessment of these likely significant effects determined that changes to the Charmouth Neighbourhood Plan are required (see Figure 3.4) in order to prevent an adverse affect on the integrity of the Sidmouth to West Bay SAC:

- AA1: Important Community Assets and Amenities;
- NE3: Biodiversity and Natural Habitats;
- BET2: Economic Development & Premises for New Businesses;
- NE6: Pollution;
- GA1: Pedestrian Routes;
- GA2: Car Parking; and
- CD1: Coastal Defences.

Providing that the mitigation is incorporated, it can be concluded that the Charmouth Neighbourhood Plan will not adversely effect on the integrity of the Sidmouth to West Bay SAC.