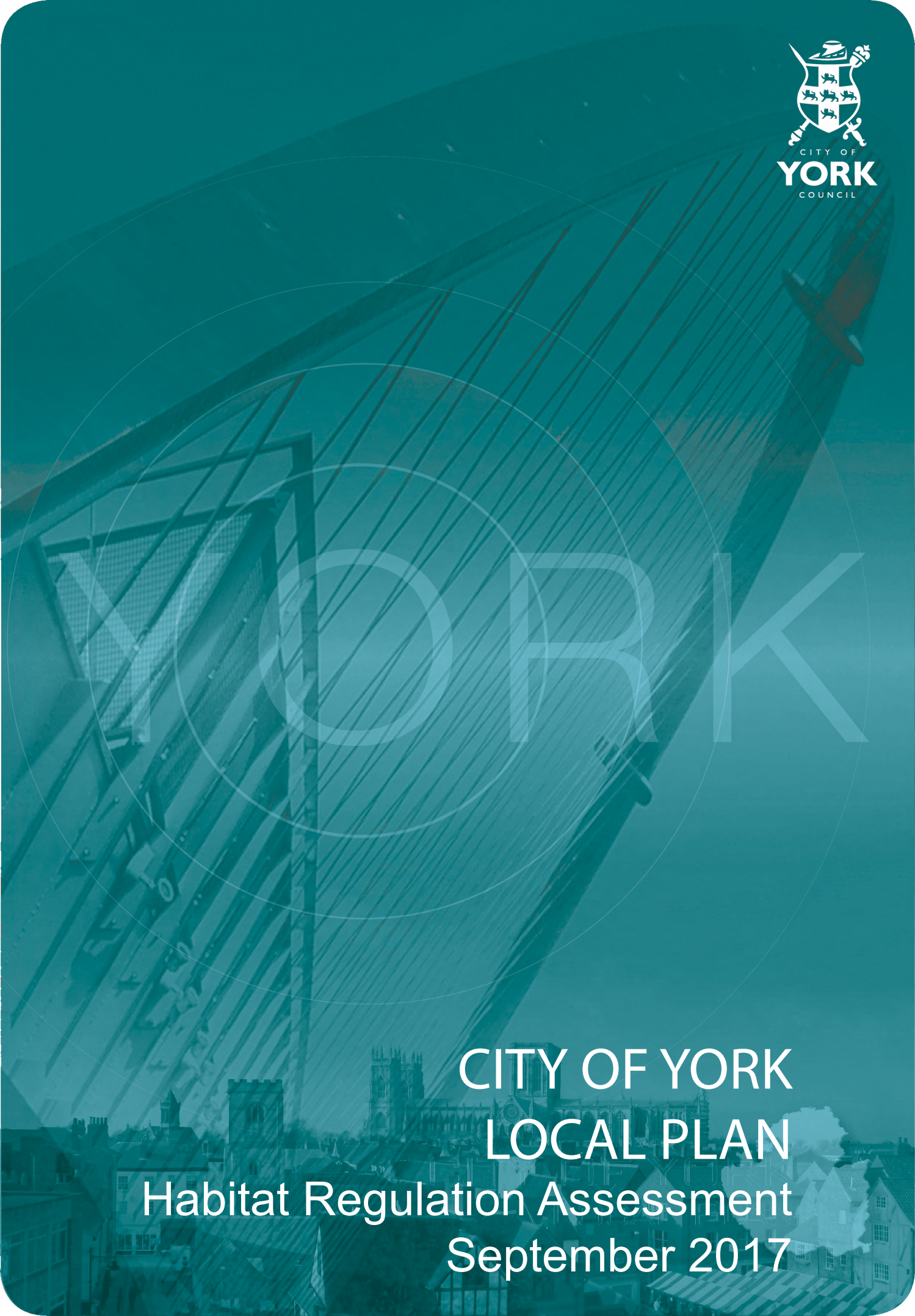

CITY OF YORK LOCAL PLAN

Habitat Regulation Assessment

September 2017

HRA of Plan Allocations

Habitats Regulations Assessment of the City of York Council Local Plan

September 2017

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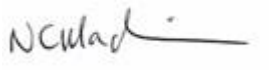

Comments

Second	Takes on board comments received from CYC

Comments

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Summary

The City of York Council (CYC) is in the process of producing its Local Plan. This Habitats Regulations Assessment (HRA) represents a preliminary assessment of the emerging Plan under the Conservation of Habitats and Species Regulations 2010 (the *Habitats Regulations*).

Its function is to test the impact of the currently proposed policies, including the housing and employment allocations on the internationally important sites for biodiversity in and around the City. Together, these Special Protection Areas, Special Areas of Conservation and Ramsar sites are known as European sites.

HRA asks very specific questions of a local plan. Firstly, it *screens* the plan to identify which policies or allocations may have a *likely significant effect* (LSE), *alone or in combination* with other plans and projects, on the European sites. If LSEs can be ruled out, then the plan may be adopted but if not, the plan must be subjected to the greater scrutiny of an '*appropriate assessment'* to find out if the plan will have *an adverse effect on the integrity* of the European sites. Again, if it passes this test, the plan may be adopted. If necessary, the plan should be amended to *mitigate* any problems, which typically means that some policies or allocations need to be modified or, more unusually, may have to be removed altogether.

This document represents only the screening exercise and it does not include the more detailed appropriate assessment. However, it still follows best practice (drawing heavily, in particular, on guidance contained within the Habitats Regulations Assessment Handbook[1]) and takes full account of Government policy and law. In due course, this HRA will influence a refined list of allocations and policies. As the plan evolves, future iterations will inevitably be based on a growing evidence base and will explore the full range of tests required by the Regulations.

138 policies and associated allocations were screened; the individual outcomes of each policy and allocation can be found in Appendix B and are summarised in Table 6. The subsequent screening, post-mitigation, appears in summarised form only and expressed in Tables 7 & 8.

Overall, this HRA found that LSE could be ruled out for 133 policies which could be excluded from any further scrutiny.

However, Policies SS19, E18 and H59 were found to cause a LSE alone across a range of factors on the adjacent Strensall Common. Similarly, because of anticipated increases in recreational pressure, Policy SS18 was found to cause a LSE alone on the Lower Derwent Valley. Finally, even though situated several kilometres from the Lower Derwent Valley, Policy SS13 was found to cause a LSE on its wintering bird populations that also use land beyond the European site boundary.

Mitigation was only found to be effective in terms of Policy SS18 where the LSE alone could be avoided. However, at this stage in the plan, it was not found possible to mitigate policies SS19, E18, H59 or SS13 and these will need to be subjected to an appropriate assessment in the near future.

Finally, the need for HRA is derived from the European Union's Habitats Directive and the decision to leave the EU potentially throws doubt on the need for the HRA of local plans. However, UK law and policy is currently unchanged and the need for HRA remains. The HRA of the Council's Local Plan will therefore continue and the recommendations will be acted upon until such time as Government indicates otherwise.

[1] Tyldesley, D., and Chapman, C., (2013) *The Habitats Regulations Assessment Handbook,* May 2015 edition UK: DTA Publications Ltd

1. Introduction

Background

1.1. The City of York Council (the *Council*) is developing its Local Plan. This will deliver the strategic vision and objectives in York over a 20-year period described in the Pre-Publication draft Local Plan (Regulation 18) Consultation document. When adopted, the Local Plan will influence all future development within the City Council's boundaries.

1.2. A Habitat Regulation Assessment was prepared alongside the Local Plan Publication draft (2014) by consultants Amec. However, consultation on this document and its supporting evidence base was halted following a decision by Full Council in October 2014 to undertake further work on the Local Plan evidence base in relation to housing numbers. Since this time further work has been undertaken to update the policies and portfolio of site allocations within the emerging Plan. This HRA document is prepared alongside the Pre-Publication Local Plan draft (Regulation 18) Consultation document to screen the impacts of the proposed policies and site allocations.

1.3. The Habitats Directive requires local (or '*competent'*) authorities to assess the impact of development plans on the Natura 2000 network of protected sites. The Directive is transposed into UK law by the Habitats and Species Regulations 2010 (as amended)[2] or the '*Habitats Regulations*'. In England, this requirement is implemented via a *Habitats Regulations Assessment* (*HRA*) which comprises a series of mandatory tests.

Habitats Regulations Assessment of Local Plans, Natura 2000 and European sites

1.4. Natura 2000 is the cornerstone of European nature conservation policy; it is an EU-wide network of Special Protection Areas (SPA) classified under the 1979 Birds Directive and Special Areas of Conservation (SAC) designated under the 1992 Habitats Directive. Together, the network comprises over 25,500 sites and safeguards the most valuable and threatened habitats and species across Europe; it represents the largest, coordinated network of protected areas in the world.

1.5. In the UK, the individual sites are more commonly referred to as 'European sites' which, according to UK Government policy[3], also comprise 'Wetlands of International Importance', or Ramsar sites. Around 8.6% of the UK land area forms part of this network including, locally, sites such as Strensall Common, Skipwith Common, the Lower Derwent Valley and River Derwent. Further afield, it also incorporates such well known sites as the Humber Estuary, Yorkshire Dales and the North York Moors.

1.6. Importantly, HRA employs the precautionary principle and Reg 102 ensures that where a plan is '*likely to have a significant effect'* (LSE), it can only be adopted if it can be ascertained that it '*will not adversely affect the integrity of the European site*'.

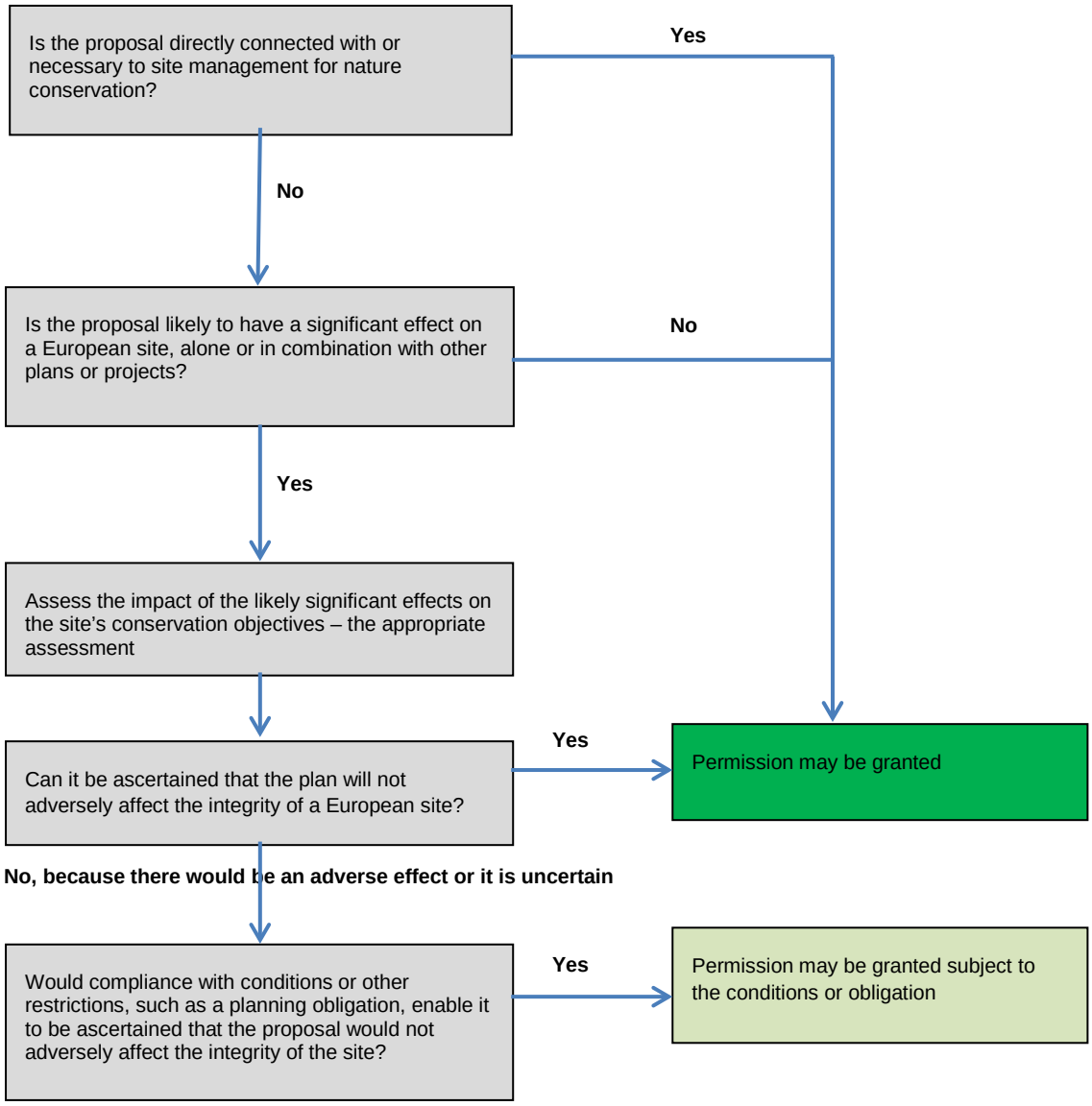
1.7. To enable this decision to be made, the Regulations employ a series of mandatory tests outlined in Fig 1 (derived from Circular 06/05[4]) which must be followed. In practical terms however, experience gained from implementation of the process since their inception in 1994 has encouraged the adoption of additional filters at the outset to explore if the plan even needs to be subject to HRA at all. This more sensible approach is described in Fig 2 where many of the component steps are given expression. It is the process described in Fig 2 that is followed in this HRA.

[2] The Conservation of Habitats and Species Regulations 2010 SI No 490 (as amended)
[3] ODPM Circular 06/2005 Government Circular R: Biodiversity and Geological Conservation – Statutory Obligations and their Impact within the Planning System (16 August 2005)
[4] Circular 06/05: Biodiversity and Geological Conservation – Statutory Obligations and Their Impact Within the Planning System. ISBN 9780117539518

1.8. So, for example, the initial test adopted in this HRA (in section 2) firstly explores if the plan can be excluded from the HRA simply because it is considered that it could not have any conceivable effect on a European site before exploring whether the plan is actually necessary for the management of a European site (in section 2 of this HRA).

1.9. If the plan cannot be ruled out at this stage, the competent authority (ie the Council) must then identify whether the plan is *'… likely to have a significant effect on a European Site … either alone or in combination with other plans or projects'* and with or without mitigation. If significant effects are found to be absent or can be avoided, the plan may be adopted without further scrutiny.

Figure 1: Consideration of development proposals affecting European sites

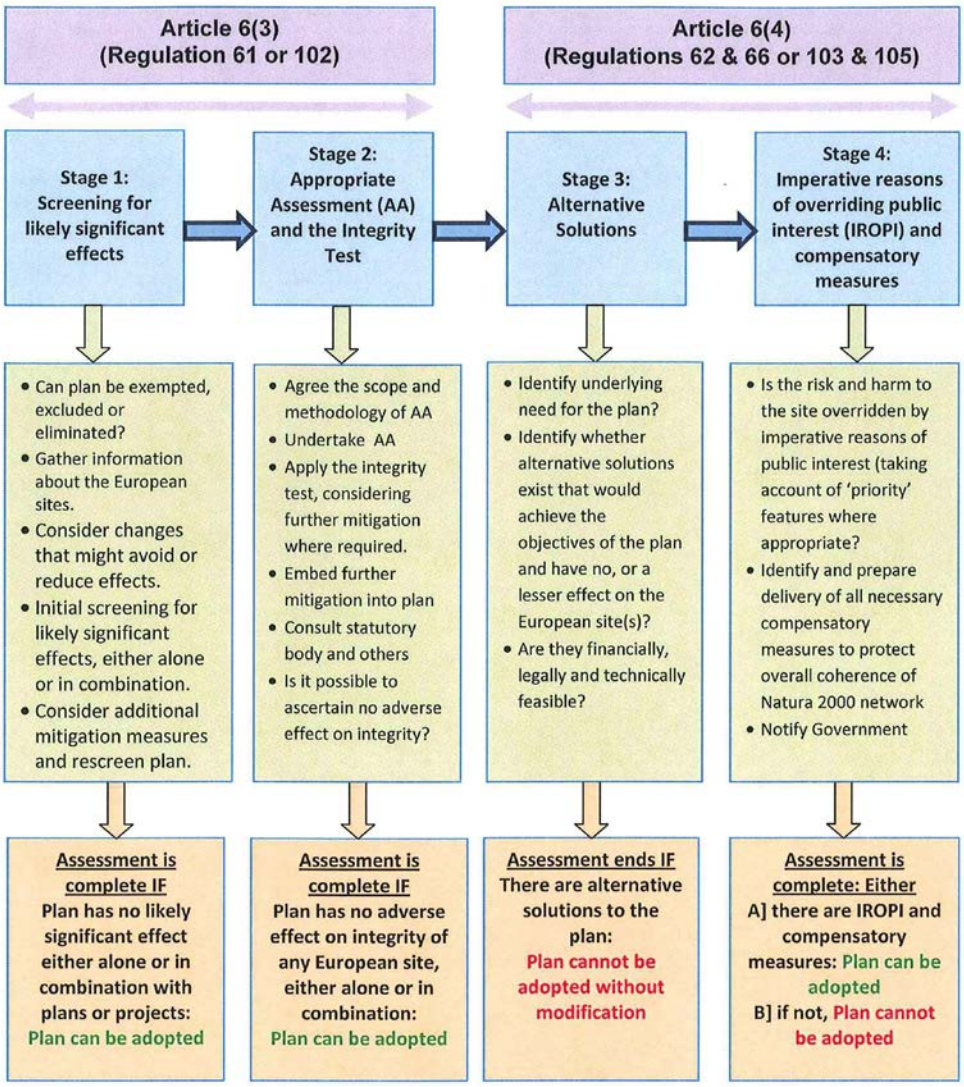


1.10. An in-combination assessment is required only where an impact is identified which is so small that alone, its effects would not be significant but, when combined with other minor effects on the same feature from other plans or projects, the combined 'residual effects' become significant. Together, these first few steps of Stage 1 (in Fig 2) are often referred to as 'screening'.

1.11. This HRA encompasses all the 'screening' steps above but it does not proceed further; it only identifies which policies will lead to LSE alone or in combination. The subsequent stages of the HRA, Stage 2 and beyond will be considered in a separate document in future if necessary. It is not the

final HRA of this plan making process, it is the first, and simply seeks to identify issues for further scrutiny.

Figure 2: Outline of the four stage approach to the assessment of plans under the Habitats Regualtions



1.12. In order to carry out this screening exercise, this HRA relies heavily on the Habitats Regulations Assessment Handbook. This draws on best practice and case law at home and across the EU to identify over 180 principles that inform how HRA should be carried out. Subscribers to the Handbook include Natural England, the Environment Agency and the Planning Inspectorate which ensures that key decision-makers utilise the approach shown in Fig 2. In addition, the design and layout of the HRA has been influenced by a number of HRAs from over the years.

1.13. Three principles are particularly relevant here:

- *… irrespective of the normal English meaning of 'likely', in this statutory context a 'likely significant effect' is a possible significant effect; one whose occurrence cannot be excluded on the basis of objective information'*;
- *A significant effect is any effect that would undermine the conservation objectives for a European site …*;

- *'Objective', in this context, means clear verifiable fact rather than subjective opinion. … There should be credible evidence to show that there is a real rather than a hypothetical risk of effects that could undermine the site's conservation objectives. Any serious possibility of a risk that the conservation objectives might be undermined should trigger an 'appropriate assessment'.*

1.14. The level of scrutiny in a screening exercise is important both in terms of the level of scrutiny and the depth of the evidence base. Indeed, the third principle above highlights that the initial screening phase is not meant to be exhaustive, a point candidly described by Advocate General Sharpston in paragraphs 49 and 50 of the Sweetman case[5] when describing the levels of scrutiny to be applied to each test as follows:

'The threshold at the first stage [the test for LSE] … is thus a very low one. It operates merely as a trigger, in order to determine whether an appropriate assessment must be undertaken … The threshold at (the second) [the appropriate assessment] stage is noticeably higher than that laid down at the first stage. That is because the question (to use more simple terminology) is not 'should we bother to check?' (the question at the first stage) but rather 'what will happen to the site if this plan or project goes ahead …'.

1.15. The judge in the Bagmoor Wind case[6] was similarly clear:

'If the absence of risk … can only be demonstrated after a detailed investigation, or expert opinion, that is an indicator that a risk exists and the authority must move from preliminary examination to appropriate assessment'.

1.16. Although not a part of this report, the test in an '*appropriate assessment*' is indeed more thorough and must determine whether it can be '*ascertained that the plan will not adversely affect the integrity of the European site' (AEOI)*. If AEOI can be avoided, the plan can again be adopted (Fig 1). If this cannot be concluded, derogations would have to be sought to allow the plan to continue; these are regarded as a last resort and considered only in exceptional circumstances. These latter stages are not shown in Fig 1 but the entire process is summarised in Stages 2, 3 & 4 of Fig 2.

1.17. The HRA of development plans was first made a requirement in the UK following a ruling by the European Court of Justice in EC v UK[7]. However, the judgement[8] recognised that any assessment had to reflect the actual stage in the strategic planning process and the level of evidence that might or might not be available. This was given expression in the UK High Court (Feeney[9]) which stated: "*Each … assessment … cannot do more than the level of detail of the strategy at that stage permits*".

1.18. HRA is an iterative process enabling the early identification of potential conflicts and providing the opportunity to resolve them prior to publication of the Draft Submission Plan, perhaps by steering development away from sensitive sites or by influencing their design or scale. As both the European Court of Justice and domestic courts have shown though, there are limits to the effectiveness of undertaking a full, formal assessment during these early stages when evidence regarding ecological matters and indeed the actual allocations is often lacking.

1.19. This is where a way has to be found that whilst mindful of the need for the precautionary principle to be applied, the HRA must strive to identify only those plausible effects and not the extremely unlikely. Indeed, the Court of Appeal (re Boggis[10]) stated that there should be "*credible evidence that there was a real, rather than a hypothetical, risk"*.

[5] C-258/11 Sweetman reference for a preliminary ruling from the Supreme Court of Ireland .. opinion of the Advocate General 22 November 2012

[6] Bagmoor Wind Limited v The Scottish Ministers Court of Sessions [2012] CSIH 93

[7] Case C-6/04: Commission of the European Communities v United Kingdom of Great Britain and Northern Ireland judgment of the Court 20 October 2005.

[8] Opinion of advocate general Kokott, 9th June 2005, Case C-6/04. Commission of the European Communities v United Kingdom of Great Britain and Northern Ireland

[9] 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

[10] Peter Charles Boggis and Easton Bavants Conservation v Natural England and Waveney District Council, High Court of Justice Court of Appeal case C1/2009/0041/QBACF Citation No [2009] EWCA Civ. 1061 20th October 2009

1.20. Draft proposals, such as those considered here, do not, strictly speaking, need to be subjected to formal HRA but the Council believes it is good practice to ensure that the potential effects on European sites are considered from the earliest stages of the plan-making process.

1.21. Because this is a strategic plan, the '*objective information*'[11] required by the HRA is typically only available at a strategic or high level, without the detail that might be expected at the planning application stage. Whilst reasonable allowances are made for this, the principles established in the Feeney case alongside the need to apply the precautionary principle remain.

1.22. However, a number of allocations are already subject to planning applications and some have already gained planning consent. Some of these will already have been considered by the Council (as the competent authority with advice sought from Natural England) under the Habitats Regulations as individual 'projects'. Unless there are reasons for doubt, any extant HRA decisions will always be adopted in this evaluation. However, the majority of developments will not have been completed (or even started) and so these could be considered as part of any future in-combination assessment if necessary.

1.23. This is an important point which draws on Defra guidance[12] and C12.1 of the Handbook[13]which allows competent authorities to reduce the duplication of effort by utilising earlier conclusions where there has been no material change in circumstances. If there is any doubt, the allocation is assessed as normal.

1.24. In terms of the overall need for this exercise, as its origins are firmly embedded in the European Union's Habitats Directive, the decision to leave the EU potentially throws doubt on the need for the HRA of local plans. However, UK law and policy is currently unchanged and the need for HRA remains. The HRA of the Council's Local Plan will therefore continue and the recommendations will be acted upon until such time as Government indicates otherwise.

1.25. Lastly, although this HRA has been prepared to help the Council discharge its duties under the Habitats Regulations, the document is neither designed to, nor can it replace the formal exercise to be undertaken separately by the Council. The Council is the competent authority and it must decide to adopt this report or otherwise.

[11] European Court of Justice Case C – 127/02 *Waddenzee* 7 September 2004
[12] Habitats Directive – Guidance on competent authority coordination under the Habitats Regulations, Defra (July 2012).
[13] Tyldesley, D., and Chapman, C., (2013) *The Habitats Regulations Assessment Handbook,* May 2015 edition UK: DTA Publications Ltd

2. Identifying the European Sites potentially at risk

2.1. Drawing on Stage 1 of Fig.2, Before identifying potentially vulnerable sites, the Handbook (F3.2 – 3.4) first provides mechanisms that allow exploration of whether the Plan (or parts of it) can be:

- **Excluded** from the HRA because 'it is not a plan within the meaning and scope of the Habitats Directive', or
- **Eliminated** from the HRA because it can easily be shown that although 'it is a plan … it could not have any conceivable effect on any European site', or
- **Exempted** from the HRA because it is '… directly connected with or necessary to the management of the … European site' (ie the first formal stage of the HRA - Fig 1).

2.2. The outcomes will be a reflection of the type and location of activities proposed within the plan and/or the ecological characteristics of the European sites – it is not an exploration of the impact of the plan on the conservation objectives of the sites, nor a test for LSE (which follows later).

2.3. Taking these in turn, **it is clear the Local Plan represents a real plan with the potential to harm European sites and so can neither be excluded nor eliminated from the HRA. Likewise, its purpose is not the nature conservation management of any European sites and so it cannot be made exempt from further assessment.** Consequently, the next steps in Stage 1 of Fig 2 need to be pursued by identifying which European sites and which features may be vulnerable as follows.

2.4. To encourage a consistent, reliable and repeatable process, the *Handbook* (F4.4) identifies 16 generic criteria, listed below in Table 1 (columns 1 & 2), that when evaluated generates a precautionary, 'long' list of European sites in column 3 which might be affected by the Plan[14]. However, when considered further, (using readily available information and local knowledge) (column 4) the list of plausible threats can be refined and the list of affected sites reduced (column 5). Albeit a coarse filter, this enables the exercise to comply with the Boggis case and attempts to only consider realistic and credible threats whilst avoiding the hypothetical or extremely unlikely.

2.5. If column 5 remains empty of European sites, following the tests in column 2, then no European sites will be considered to be at risk and no further scrutiny will be required. Note that sites identified against the first criterion should be ignored as this is simply a list of European sites within the City Council's boundary.

2.6. The search was restricted to those European sites found within 20km of the district boundary as this was considered to be the maximum extent that policies and allocations could seriously be considered to generate measurable effects. These sites are the River Derwent, Lower Derwent Valley, Strensall Common, all found within the city and, Kirk Deighton, Skipwith Common, the Thorne and Hatfield Moor complex and the Humber Estuary which are all found in neighbouring local authorities.

[14] This table is taken from the Handbook albeit with changes to the number and titles of columns appropriate to this HRA.

Table 1: Potential mechanisms and the initial list of European sites that could be affected

Types of plan (or potential effects)	Sites to scan for and check	Initial list of potentially affected European sites	Additional context	Final list of European sites selected
1. All plans (terrestrial, coastal and marine)	Sites within the geographic area covered by or intended to be relevant to the plan	Lower Derwent Valley (SPA, SAC, Ramsar) River Derwent (SAC) Strensall Common (SAC)	N/A	Unchanged: Lower Derwent Valley River Derwent Strensall Common
2. Plans that could affect the aquatic environment	Sites upstream or downstream of the plan area in the case of river or estuary sites	Humber Estuary (SPA, SAC, Ramsar) Lower Derwent Valley (SPA, SAC, Ramsar) River Derwent (SAC)	Effects considered are those associated with the physical presence of built development and the *localised* effects on surface and ground water resources and quality resulting from changes in run-off, sedimentation, erosion etc. No development is proposed that could lead to such effects in the vicinity of the first four European sites. Therefore, **effects on the aquatic environment are removed from further consideration for these European sites**. However, this may not the case at Strensall Common where development immediately adjacent to this wetland site is proposed. Consequently, **Strensall Common will remain in the assessment.**	Changed: None
	Open water, peatland, fen, marsh and other wetland sites with relevant hydrological links to land within the plan area, irrespective of distance from the plan area	Skipwith Common (SAC) Strensall Common (SAC)		Changed: Strensall Common

Types of plan (or potential effects)	Sites to scan for and check	Initial list of potentially affected European sites	Additional context	Final list of European sites selected
			Note that the *indirect* effects of changes to wastewater disposal are assessed separately under '7b'.	
3. Plans that could affect the marine environment	Sites that could be affected by changes in water quality, currents or flows; or effects on the inter-tidal or sub-tidal areas or the sea bed, or marine species	Humber Estuary (SPA, SAC, Ramsar)	Given the distance and lack of public access to the closest parts of the Upper Estuary, it is considered almost inconceivable that any aspect of the Plan could affect any of the physical and biological processes/features of the Humber Estuary. Consequently, **effects on the marine environment on the Humber Estuary are removed from any further consideration in this HRA.** This conclusion may only warrant re-appraisal if adverse effects cannot be ruled out for lamprey within the River Derwent which use the river and estuary as part of their migratory life cycle.	Changed: None
4. Plans that could affect the coast	Sites in the same coastal 'cell', or part of the same coastal ecosystem, or where there are interrelationships with or between different physical coastal processes	None	N/A	Unchanged: None
5. Plans that could affect mobile species	Sites whose qualifying features include mobile species which may	Humber Estuary (SPA, SAC, Ramsar)	This considers direct impacts of plan proposals on mobile species. Given that great crested newts	Changed: Humber Estuary

Types of plan (or potential effects)	Sites to scan for and check	Initial list of potentially affected European sites	Additional context	Final list of European sites selected
	be affected by the plan irrespective of the location of the plan's proposals or whether the species would be in or out of the site when they might be affected	Kirk Deighton (SAC) Lower Derwent Valley (SPA, SAC, Ramsar) River Derwent (SAC)	are relatively constrained to the breeding pond and that no development is proposed nearby, then it will not be affected by the Plan. Therefore, effects on mobile species at **Kirk Deighton SAC are removed from any further consideration in this HRA.**	Lower Derwent Valley River Derwent
6. Plans that could increase recreational pressure on European sites potentially vulnerable or sensitive to such pressure	(a) Such European sites in the plan area	Lower Derwent Valley (SPA, SAC, Ramsar) River Derwent (SAC) Strensall Common (SAC)	N/A	Unchanged: Lower Derwent Valley River Derwent Strensall Common
	(b) Such European sites within an agreed zone of influence or other reasonable and evidence-based travel distance of the plan area boundaries that may be affected by local recreational or other visitor pressure from within the plan area	Humber Estuary (SPA, SAC, Ramsar) Kirk Deighton (SAC) Thorne Moor (SAC) Hatfield Moor (SAC) Thorne & Hatfield Moors (SPA) Skipwith Common (SAC)	Kirk Deighton SAC lies around 15km from the nearest allocation on private land with no public access and so effects from recreational pressure at **Kirk Deighton SAC are removed from any further consideration in this HRA.** In terms of public pressure, the otherwise fragile sites of all the components of the Thorne & Hatfield Moors complex, display either restricted access and/or effective visitor management to strongly suggest that not only would visitor numbers would be low, but they are likely to be well managed and the sites (and associated	Changed: Humber Estuary Skipwith Common

Types of plan (or potential effects)	Sites to scan for and check	Initial list of potentially affected European sites	Additional context	Final list of European sites selected
			mobile species) would be resilient to change brought about by this Plan.	
	(c) Such European sites within an agreed zone of influence or other evidence-based longer travel distance of the plan area, which are major (regional or national) visitor attractions such as European sites which are National Nature Reserves where public visiting is promoted, sites in National Parks, coastal sites and sites in other major tourist or visitor destinations	None	The sites of the Peak District, Yorkshire Dales, and Flamborough Head etc are considered too distant to be affected by any credible threats	Unchanged: None
7. Plans that would increase the amount of development	(a) Sites in the plan area or beyond that are used for, or could be affected by, water abstraction irrespective of distance from the plan area	None	The HRA of Yorkshire Water's Water Resources Management Plan found that there were unlikely to be any significant effects on European sites, either alone or in combination with other plans or projects[15].	Unchanged
	(b) Sites used for, or could be affected by, discharge of effluent from waste water treatment works or other waste management streams serving the plan area, irrespective of distance from the plan area	Humber Estuary (SAC, Ramsar) Lower Derwent Valley (SAC, Ramsar) River Derwent (SAC)	Yorkshire Water has a legal duty to provide wastewater treatment for new dwellings. Policy GI2 (vi) effectively relates the construction of new development to the availability of capacity at wastewater treatment works across the area. Consequently, adverse effects on the receiving water bodies from the anticipated increase in	Changed: None

[15] Water Resource Management Plan 2014 Strategic Environmental Assessment Post Adoption Statement Cascade/Yorkshire Water

Types of plan (or potential effects)	Sites to scan for and check	Initial list of potentially affected European sites	Additional context	Final list of European sites selected
			wastewater disposal can be ruled out of this HRA with no residual effects. All European sites can be removed from further scrutiny.	
	(c) Sites that could be affected by the provision of new or extended transport or other infrastructure	None	No such infrastructure proposed	Unchanged: None
	(d) Sites that could be affected by increased deposition of air pollutants arising from the proposals, including emissions from significant increases in traffic	Lower Derwent Valley (SPA, SAC, Ramsar) River Derwent (SAC) Skipwith Common (SAC) Strensall Common (SAC) Thorne Moor (SAC) Hatfield Moor (SAC) Thorne & Hatfield Moors (SPA)	The low number of anticipated visitors allied with distance from major roads suggests that impacts from airborne pollution from traffic can be ruled out of this HRA for all the sites in the Thorne & Hatfield Moor complex. No major, point source emitters of airborne pollution are proposed in the plan and so this category is restricted to road traffic emissions.	Changed: Lower Derwent Valley River Derwent Skipwith Common Strensall Common
8 Plans for linear developments or infrastructure	Sites within a specified distance from the centre line of the proposed route (or alternative routes), the distance may be varied for differing types of site / qualifying features and in the absence of established good practice standards, distance(s) to	None	No such infrastructure proposed	Unchanged: None

Types of plan (or potential effects)	Sites to scan for and check	Initial list of potentially affected European sites	Additional context	Final list of European sites selected
	be agreed by the statutory nature conservation body			
9. Plans that introduce new activities or new uses into the marine, coastal or terrestrial environment	Sites considered to have qualifying features potentially vulnerable or sensitive to the effects of the new activities proposed by the plan	None	No such activities proposed	Unchanged: None
10. Plans that could change the nature, area, extent, intensity, density, timing or scale of existing activities or uses	Sites considered to have qualifying features potentially vulnerable or sensitive to the effects of the changes to existing activities proposed by the plan	None	No such activities proposed	Unchanged: None
11. Plans that could change the quantity, quality, timing, treatment or mitigation of emissions or discharges to air, water or soil	Sites considered to have qualifying features potentially vulnerable or sensitive to the changes in emissions or discharges that could arise as a result of the plan	None	No such activities proposed	Unchanged: None
12. Plans that could change the quantity,	Sites whose qualifying features include the biological resources	None	No such activities proposed	Unchanged:

Types of plan (or potential effects)	Sites to scan for and check	Initial list of potentially affected European sites	Additional context	Final list of European sites selected
volume, timing, rate, or other characteristics of biological resources harvested, extracted or consumed	which the plan may affect, or whose qualifying features depend on the biological resources which the plan may affect, for example as prey species or supporting habitat or which may be disturbed by the harvesting, extraction or consumption			None
13. Plans that could change the quantity, volume, timing, rate, or other characteristics of physical resources extracted or consumed	Sites whose qualifying features rely on the non-biological resources which the plan may affect, for example, as habitat or a physical environment on which habitat may develop or which may be disturbed by the extraction or consumption	None	No such activities proposed	Unchanged: None
14. Plans which could introduce or increase, or alter the timing, nature or location of disturbance to species	Sites whose qualifying features are considered to be potentially sensitive to disturbance, for example as a result of noise, activity or movement, or the presence of disturbing features that could be brought about by the plan	Lower Derwent Valley (SPA, SAC, Ramsar) River Derwent (SAC) Thorne & Hatfield Moors (SPA) Humber Estuary (SPA, SAC, Ramsar) Kirk Deighton (SAC)	For the purposes of this HRA, it is considered that the effects of this category will be captured effectively via the application of criteria 5 (mobile species) and/or 6 (recreation). Therefore, this criterion is screened out to avoid duplication and so **impacts resulting from 'Disturbance' will be removed from further**	Changed: None

Types of plan (or potential effects)	Sites to scan for and check	Initial list of potentially affected European sites	Additional context	Final list of European sites selected
			consideration in this HRA on all five European sites listed.	
15. Plans which could introduce or increase or change the timing, nature or location of light or noise pollution	Sites whose qualifying features are considered to be potentially sensitive to the effects of changes in light or noise that could be brought about by the plan	None	No such activities proposed	Unchanged: None
16. Plans which could introduce or increase a potential cause of mortality of species	Sites whose qualifying features are considered to be potentially sensitive to the source of new or increased mortality that could be brought about by the plan	None	No such activities proposed	Unchanged: None

2.7. The outputs of the review carried out in Table 1 not only reduce the number of factors at play but clarify the nature of potential impacts.

2.8. Firstly, this exercise rules out the possibility of any credible effects from any aspect of the Plan on Kirk Deighton SAC, Thorne Moor SAC, Hatfield Moor SAC and Thorne & Hatfield Moors SPA. These sites will therefore be ruled out of any further scrutiny in this HRA.

2.9. Secondly, it confirms that the focus of this HRA should be restricted to only the following European sites:

- Humber Estuary (SPA, SAC & Ramsar);
- Lower Derwent Valley (SPA, SAC & Ramsar);
- River Derwent (SAC);
- Skipwith Common (SAC);
- Strensall Common (SAC)

And that these should be scrutinised in terms of the following potential impacts on/from:

- The aquatic environment (Strensall Common);
- Mobile species (Humber Estuary, Lower Derwent Valley and River Derwent);
- Recreational pressure (Lower Derwent Valley, River Derwent, Skipwith Common and Strensall Common); and
- Airborne pollution (Lower Derwent Valley, River Derwent, Skipwith Common and Strensall Common).

2.10. The net result, and benefit to the HRA, is that the list of issues and sites potentially affected is reduced, making for a shorter and more focused HRA than would otherwise be the case.

2.11. However, as the text above shows, impacts on a number of European sites cannot be ruled out and so further ecological information needs to be gathered to inform subsequent tests in the HRA. Consequently, all five sites that remain at risk are described and their reasons for designation (or qualifying features) listed in Table 2 below. Their conservation objectives, and a list of the 'pressures and threats' they experience (the latter drawn from Natural England's Site Improvement Plans or SIPs) are provided in Appendix A.

Table 2: Description of European Sites

Site name	Description	Qualifying Features
Humber Estuary SAC, SPA & Ramsar	The Humber Estuary is a huge estuary carrying high suspended sediment loads which sustain a dynamic system of intertidal and subtidal mudflats, sandflats, saltmarsh and reedbeds. Elsewhere, other notable habitats include sand dunes, together with coastal lagoons and sub-tidal sandbanks. Qualifying (mobile) species include river and sea lamprey which migrate through the estuary to rivers in the Humber catchment. The estuary regularly supports around 150,000 wintering and passage waterbirds. At high tide, large mixed flocks congregate in key roost sites often beyond the designated site boundary due to the combined effects of extensive land claim, coastal squeeze and lack of grazing marsh and grassland on both banks of the estuary. In summer, the site supports important breeding populations of Bittern, Marsh harrier, Avocet and Little tern. Although the Ramsar designation introduces different names for otherwise similar features, these can be safely accommodated within the SPA and SAC features in terms of the HRA of this plan. Natural England has assessed 98% of the underpinning Humber Estuary SSSI to be in 'favourable' or 'unfavourable recovering' condition. 2% of the site has been assessed to be in 'unfavourable no change' or 'unfavourable declining' condition, although the majority of the affected units are associated with Barton and Barrow Claypits far away on the south bank. However, the 'threat' level is considered to be 'high' across a much wider area. The corresponding SIP for the European site identifies, *inter alia*, a number of threats including water pollution and public pressure. Whilst therefore potentially vulnerable to a wide range of factors, its size, considerable distance from any point sources within the	**SPA** • A021 *Botaurus stellaris*; great bittern (Non-breeding); • A021 *Botaurus stellaris*; great bittern (Breeding); • A048 *Tadorna tadorna*; common shelduck (Non-breeding); • A081 *Circus aeruginosus*; Eurasian marsh harrier (Breeding); • A082 *Circus cyaneus*; hen harrier (Non-breeding); • A132 *Recurvirostra avosetta*; pied avocet (Non-breeding); • A132 *Recurvirostra avosetta*; pied avocet (Breeding); • A140 *Pluvialis apricaria*; European golden plover (Non-breeding); • A143 *Calidris canutus*; red knot (Non-breeding); • A149 *Calidris alpina alpina*; dunlin (Non-breeding); • A151 *Philomachus pugnax*; ruff (Non-breeding); • A156 *Limosa limosa islandica*; black-tailed godwit (Non-breeding); • A157 *Limosa lapponica*; bar-tailed godwit (Non-breeding); • A162 *Tringa totanus*; common redshank (Non-breeding); • A195 *Sterna albifrons*; little tern (Breeding); • Waterbird assemblage. **SAC Annex I habitats:** • 1130 Estuaries; • 1110 Sandbanks which are slightly covered by sea water all the time; • 1150 Coastal lagoons * Priority feature; • 1310 Salicornia and other annuals colonizing mud and sand;

Site name	Description	Qualifying Features
	Council area and relative robustness of many of the features make the likelihood of harmful effects rather remote. The one possible exception to this is the population of lamprey which migrate from the sea, via the Humber to breeding grounds in the River Derwent. Physical or chemical barriers to migration may cause harm and so factors like wastewater disposal can require careful scrutiny if not addressed effectively in policy terms.	• 1330 Atlantic salt meadows (Glauco-Puccinellietalia maritimae); • 2110 Embryonic shifting dunes; • 2120 Shifting dunes along the shoreline with *Ammophila arenaria* (white dunes); • 2130 Fixed coastal dunes with herbaceous vegetation (grey dunes) * Priority feature; • 2160 Dunes with *Hippophae rhamnoides*. **SAC Annex II species:** • 1095 sea lamprey *Petromyzon marinus*; • 1099 river lamprey *Lampetra fluviatilis*; • 1364 grey seal *Halichoerus grypus*. **Ramsar** Criterion 1 – near natural estuary; Criterion 3 – breeding colony of grey seals; Criterion 5 – Internationally important assemblage of wintering waterfowl; Criterion 6 – Internationally important populations of waterbirds on passage: Eurasian golden plover *Pluvialis apricaria*, red knot *Calidris canutus*, dunlin *Calidris alpina,* black-tailed godwit *Limosa limosa islandica and* redshank *Tringa tetanus;* Criterion 6 – Internationally important populations of waterbirds in winter: common shelduck *Tadorna tadorna,* Eurasian golden plover *Pluvialis apricaria,* red knot *Calidris canutus* and dunlin *Calidris alpina;* Criterion 8 – migration route for river lamprey *Lampetra fluviatilis* and sea lamprey *Petromyzon marinus.*
Lower Derwent Valley SAC, SPA & Ramsar	The Lower Derwent Valley (LDV) supports the largest single expanse of wet, neutral (MG4) hay meadow in the UK, alongside fen, swamp, alder woodland and open water. The majority of the	**Lower Derwent Valley SAC**

Site name	Description	Qualifying Features
	habitats also contribute to hosting internationally important populations of breeding and wintering waterbirds. The habitats are reliant in part on the maintenance of a favourable hydrological regime, including periodic inundation, whilst the mobile species remain susceptible to public pressure and disturbance. Wintering and breeding waterbirds communities both utilise functionally-linked farmland outside the designated site, sometimes several kilometres distant. In common with the River Derwent SAC, the qualifying features include important otter populations. Importantly, the SPA is classified only for wintering and breeding bird communities whereas the Ramsar designation adds wetland invertebrates, passage birds, ruff and whimbrel. All features are considered in this screening assessment and, reflecting the ecology of the species and habitats, an approach based on the evaluation of just the SPA and SAC features is considered to be adequate to embrace all species and all designations. The majority of the site is privately owned and farmed with limited public access but all is managed for nature conservation in partnership with Natural England, including the Lower Derwent Valley National Nature Reserve (NNR). Limited car parking and a formal arrangement of screens, footpaths and hides effectively reduces the impact of existing recreational pressure although some 'informal' access occurs. Despite this, the site is relatively robust but large increases in the number of local residents (and visitors) may be difficult to accommodate without substantial mitigation including, perhaps, the establishment of new wet grassland with associated visitor facilities in less fragile locations elsewhere. There are five component SSSIs. Natural England has assessed all of the Derwent Ings SSSI to be in 'favourable' or 'unfavourable recovering' condition. 99.6% of the River Derwent SSSI is considered to be in 'favourable' or 'unfavourable recovering'	• H91E0: Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae)* • H6510: Lowland hay meadows (*Alopecurus pratensis, Sanguisorba officinalis*) • S1355: *Lutra lutra*: otter **Lower Derwent Valley SPA** • Waterbird assemblage • A052(NB) *Anas crecca*: Eurasian teal • A050(NB) *Anas penelope*: Eurasian wigeon • A056(B) *Anas clypeata*: Northern shoveler • A151(NB) *Philomachus pugnax*: ruff • A140(NB) *Pluvialis apricaria* : European golden plover • A037 (NB) *Cygnus columbianus bewickii*: Bewick's swan (not listed in SIP) • (NB) non-breeding • (B) breeding **Lower Derwent Valley Ramsar** • Criterion 2 - Assemblage of wetland invertebrates. • Criterion 4 – Nationally important populations of ruff *Philomachus pugnax* and whimbrel *Numenius phaeopus* on passage • Criterion 5 – Internationally important assemblage of wintering birds • Criterion 6 – Internationally important populations of wigeon *Anas penelope* and teal *Anas crecca*

Site name	Description	Qualifying Features
	condition; only 0.4% is considered to be 'unfavourable no change' but the threat level is considered to be 'high' across a much wider area. All of Newton Mask SSSI, Breighton Meadows SSSI and Melbourne and Thornton Ings SSSI are considered to be in favourable condition but carry a range of threats from none to high, especially for the latter at Breighton Meadows. The corresponding SIP for the European site identifies, *inter alia*, a number of threats including public pressure, air pollution and invasive species.	
River Derwent SAC	The River Derwent represents one of the best examples in England of a lowland classic river stretching from Ryemouth in the north to its confluence with the Ouse in the south of the District – a small stretch lies within the Lower Derwent Valley NNR. It supports diverse communities of flora and fauna, notably floating vegetation dominated by water crowfoot; and river lamprey *Lampetra fluviatilis*, sea lamprey *Petromyzon marinus*, otter *Lutra lutra* and bullhead *Cottus gobio*. The mobile species utilise extensive stretches of water both upstream and downstream of the designated site, and elsewhere within the catchment beyond the boundaries of the SAC, and are critically dependent on the maintenance of a favourable hydrological conditions throughout their range. In particular, lamprey migrate to the open sea via the Derwent, Ouse and Humber Estuary providing an intimate link between both sites. Limited car parking and a formal arrangement of footpaths reduces the impact of existing recreational pressure (although informal access also occurs) and the simple width of the channel reduces direct impacts. Overall, the site is relatively robust but vulnerable to changes in water quality from wastewater disposal, for instance.	• H3260. Water courses of plain to montane levels with the *Ranunculion fluitantis* and *Callitricho-Batrachion* vegetation; rivers with floating vegetation often dominated by water-crowfoot; • S1095. *Petromyzon marinus*; sea lamprey; • S1099. *Lampetra fluviatilis*; river lamprey; • S1163. *Cottus gobio*; bullhead; • S1355. *Lutra lutra*; otter.

Site name	Description	Qualifying Features
	There are two component SSSIs – the River Derwent and Newton Mask. Natural England has assessed 99.6% of the River Derwent SSSI to be in 'favourable' or 'unfavourable recovering' condition; 0.4% is 'unfavourable no change' but the threat level is considered to be 'high' across a much wider area. All of Newton Mask SSSI is considered to be in favourable condition but carries a 'medium' threat level. The corresponding SIP for the European site identifies, *inter alia*, a number of threats including public pressure, air pollution and hydrological changes.	
Skipwith Common SAC	Skipwith Common supports extensive areas of both wet and dry heath, with rush pasture, mire, reedbed, open water and woodland. The entire European site is managed as a National Nature Reserve by Natural England, grazed with cattle and sheep and has been dedicated as open access land under CRoW. The number of visitors is thought to be increasing causing some erosion and disturbance of grazing animals, and the heathland could be vulnerable to nitrogen deposition. The site remains both fragile and vulnerable. The underpinning Skipwith Common SSSI was assessed by Natural England to be in 'favourable' or 'unfavourable recovering' condition in 2014. The corresponding SIP for the European site identifies, *inter alia*, a number of threats including public pressure, air pollution and drainage.	• H4010. Northern Atlantic wet heaths with *Erica tetralix*; wet heathland with cross-leaved heath; • H4030. European dry heaths.
Strensall Common SAC	Strensall Common is managed in part by the Yorkshire Wildlife Trust and MOD, and, at over 730 ha, supports one of the largest areas of lowland heath in northern England. Extensive areas of both wet and dry heath occur and form a complex habitat mosaic with grassland, woodlands and ponds.	• H4010. Northern Atlantic wet heaths with *Erica tetralix*; wet heathland with cross-leaved heath; • H4030. European dry heaths.

Site name	Description	Qualifying Features
	Vulnerable to nitrogen deposition it is also subject to considerable visitor pressure although an established network of paths reduces trampling pressure, regular closures of much of the heath by the MOD to allow safe operation of the adjacent firing ranges also helps manage this pressure. However, the wet heath habitat is particularly vulnerable, not only to erosion etc, but also changes to the local hydrological regime and so construction proposed nearby will require careful scrutiny. The underpinning SSSI (which is notified for similar features but under domestic legislation) is considered by Natural England to be in favourable or unfavourable-recovering condition. The corresponding SIP for the European site identifies, *inter alia*, a number of threats including public pressure and air pollution	

2.12. The outputs of Table 1 allowed this HRA to focus solely on a restricted number of possible impacts on five European sites: the Humber Estuary, Lower Derwent Valley, the River Derwent and both Skipwith and Strensall Commons. However, by drawing on the additional information provided in Table 2, the HRA is able to further refine the possible impacts to specific features, habitats and species. These, the key issues for the next, formal stage of this screening exercise are presented in Table 3.

Table 3: Summarised, initial list of European sites, affected features and potential effects

European site	Potential effects	Specific features
Lower Derwent Valley SPA, SAC & Ramsar	(5) Impacts on mobile species	Breeding, non-breeding birds and otter
	(6) Impacts from recreational pressure	All habitats and species
	(7d) Impacts from air pollution	All habitats
River Derwent SAC	(5) Impacts on mobile species	Otter, bullhead and lamprey
	(6) Impacts from recreational pressure	All habitats and species
	(7d) Impacts from air pollution	Floating vegetation dominated by water crowfoot
Skipwith Common SAC	(6) Impacts from recreational pressure	All habitats
	(7d) Impacts from air pollution	All habitats
Strensall Common SAC	(2) Impacts on the aquatic environment	All habitats
	(6) Impacts from recreational pressure	All habitats
	(7d) Impacts from air pollution	All habitats
Humber Estuary SAC, SPA, Ramsar	(5) Impacts on mobile species	Lamprey, grey seal and both breeding and non-breeding birds
	(6) Impacts from recreational pressure	Breeding and non-breeding birds

2.13. Note that whilst Ramsar features often share considerable overlap with SPA and SAC features and so can frequently be considered as one, the relationship is not always so convenient. For instance, the wetland invertebrate assemblage in the Lower Derwent Valley (a Ramsar feature) is not represented in the corresponding SAC. However, as the safeguard of these features depends on ensuring that the supporting wetland and grassland habitats of the SAC are retained in favourable conservation status, then assessing the impact of the plan proposals on the latter will be sufficient to deliver the necessary scrutiny of Ramsar sites as required by current Government policy. Therefore, there will no specific reference to Ramsar features in the following screening exercise unless it is required for clarity.

3. Screening the Policies – process and outcomes

Methodology

3.1. The previous section confirmed that the Local Plan could not be excluded from scrutiny and identified which European sites and which features might be affected by it. Again, by drawing on the Handbook, the next step, encompassing the second formal test from Fig 1, is to identify if there is a credible risk that a proposal in the Local Plan may lead to a LSE on a European site (by threatening to undermine its conservation objectives). It achieves this by evaluating the proposals in the plan against the following criteria to see if they are:

- **Screened out from further scrutiny** (because the individual policies or allocations are considered not 'likely to have a significant effect on a European site, either alone or in combination with other plans and projects');
- **Screened in for further scrutiny** (because the individual policies or allocations are considered 'likely to have a significant effect on a European site, either alone or in combination with other plans and projects').

3.2. To achieve this, the Handbook goes on to provide a list of 'screening categories' (Table 4) designed to evaluate both policy and site-based allocations to provide a rigorous and transparent approach to the screening process.

Table 4: Screening Categories

Code	Category	Outcome
A	General statement of policy/general aspiration	Screened out
B	Policy listing general criteria for testing the acceptability/sustainability of the plan	Screened out
C	Proposal referred to but not proposed by the plan	Screened out
D	Environmental protection/site safeguarding policy	Screened out
E	Policies or proposals which steer change in such a way as to protect European sites from adverse effects	Screened out
F	Policy that cannot lead to development or other change	Screened out
G	Policy or proposal that could not have any conceivable effect on a site	Screened out
H	Policy or proposal the (actual or theoretical) effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects	Screened out
I	Policy or proposal with a likely significant effect on a site alone	Screened in
J	Policy or proposal with an effect on a site but not likely to be significant alone, so need to check for likely significant effects in combination	Check
K	Policy or proposal not likely to have a significant effect either alone or in combination (screened out after the in-combination test)	Check

Code	Category	Outcome
L	Policy or proposal likely to have a significant effect in combination (screened in after the in-combination test)	Check

3.3. Bearing these criteria in mind, each of the outstanding threats identified in Table 3 is now considered against the conservation objectives for the European sites (Appendix A) to assess the effects on individual qualifying features. This is undertaken in appropriate detail for a screening exercise immediately below and the outcomes summarised in Tables 5 and 6. This is then applied to every single one of the policies and allocations to provide a bespoke screening conclusion for each. Given the large number of policies and allocations, this analysis is presented in Appendix B.

Screening

Potential Effect – Aquatic environment

European sites	Feature
Strensall Common	Wet heath

Context

3.4. This criterion is concerned with built development and its localised effects on surface and sub-surface flows both in terms of water quality and water resources resulting from changes in run-off, sedimentation, erosion etc.

3.5. The proposals at Strensall Common (Policies SS19, E18 and H59) suggest the construction of over 600 dwellings (578 under SS19 and 45 under H59) and an employment area immediately adjacent to the SAC which supports wet heath, a threatened habitat with a restricted distribution in the UK and beyond. However, drainage was not identified as a key pressure or threat in the relevant SIP (Appendix A).

Screening opinions

3.6. The existing policy encourages considerable development immediately adjacent to the internationally important site of Strensall Common.

3.7. Wet heath with cross-leaved heath is found in the vicinity of the proposed development and extends across the site. It is a fragile habitat, vulnerable to changes in the local surface or sub-surface hydrological regime. It is anticipated that construction of the proposed development would be prolonged, extending over several years and would comprise substantial earthworks, the installation of drains and the storage of fuel and other potential contaminants, all with the potential to adversely affect the local hydrological regime. No mitigation is embedded in the policy wording.

3.8. Whilst it is not suggested that impacts from construction will adversely affect the entire site, it is possible that changes to drainage patterns could extend across significant areas of the SAC. This would conflict with the conservation objective for Strensall Common to '*maintain … the extent and distribution … the structure and function … and the supporting processes … of the qualifying natural habitats ..*'

3.9. Consequently, given the scale and location of the proposals allied with the lack of mitigation, **there is a risk that the proposals could undermine the conservation objectives for Strensall Common SAC and that a likely significant effect cannot be ruled out (alone) and so the policies and allocations must be screened in (Category I).**

Potential Effect – Mobile Species

European sites	Feature
Lower Derwent Valley	Breeding and non-breeding birds, and otter
River Derwent	Otter, bullhead and lamprey
Humber Estuary	Lamprey, grey seals and both breeding and non-breeding birds

Context

3.10. Mobile Species are defined here as those that also utilise ('functionally-linked') land or water beyond the designated site boundary for some part of their life-cycle; consequently, they are vulnerable to a range of both localised and strategic effects away from protected areas. Therefore, in the case of fish and otter, effects on water quality and resources will have to be considered both up and downstream, and, in terms of bird populations, attention will have to be paid to land-take or disturbance on potentially wide areas of land.

3.11. All the potential European sites selected identify 'disturbance' as a key pressure or threat in the relevant SIP (Appendix A).

Screening opinions

3.12. Effects on mobile species are only likely to be significant where development is located in close proximity to a designated site, having functionally-linked land or water that is in hydraulic continuity to the site. This category is solely concerned with this type of direct effect.

3.13. Given the absence of proposed development in close proximity to the estuary or known, functionally-linked land, **it is considered highly unlikely that any proposals in the Plan could undermine the conservation objectives of the breeding and non-breeding bird populations of the Humber Estuary SPA and so likely significant effects (alone) can be screened out (Category G).**

3.14. Similarly, and simply because of the distance between the Plan area and seal haul-out areas, **it is considered highly unlikely that any proposals in the Plan could undermine the conservation objectives of the grey seal populations of the Humber Estuary SAC and so likely significant effects (alone) can be screened out (Category G).**

3.15. Otters are associated with waterways throughout the district and, in common with experiences across much of lowland England, populations have been steadily increasing as water quality, in particular, has improved. Otters are typically nocturnal and elusive and although they will range widely in the rivers and adjacent riparian habitats to forage, holts are typically established away from human influence. As no allocations promote obstructions in the rivers and all are situated far from water courses, no significant effects are anticipated.

3.16. Consequently, **it is considered highly unlikely that any proposals in the Plan could undermine the conservation objectives of the otter populations of the River Derwent or**

Lower Derwent Valley SACs and so likely significant effects (alone) can be screened out (Category G).

3.17. Given the absence of proposals for the creation of physical or other obstructions in watercourses, **it is considered highly unlikely that any proposals in the Plan could undermine the conservation objectives of the lamprey and bullhead populations of the River Derwent or Humber Estuary SACs and so likely significant effects (alone) can be screened out (Category G).**

3.18. The Lower Derwent Valley supports diverse, fragile breeding and non-breeding bird populations throughout the year, both within the SPA and on functionally-linked land beyond. All are equally vulnerable to disturbance from public pressure which could result in their disturbance or displacement.

3.19. Whilst the vast majority of policies will clearly have no impact on mobile species associated with the Lower Derwent Valley at any time of year, one policy might. This is because ornithological work associated with policy SS13 suggests that significant numbers non-breeding golden plover and lapwing associated with the SPA also utilise land around this major new settlement (Land West of Elvington Lane). Whilst efforts to mitigate habitat loss associated with the proposed development site have been incorporated in the policy wording, this has not been designed to accommodate wintering waders.

3.20. This would conflict with the conservation objective for the Lower Derwent Valley SPA to 'ensure that the integrity of the site is maintained by …*maintaining … the extent and distribution … the structure and function … and the supporting processes on which the habitats of the qualifying features rely .. the population … and the distribution of the qualifying features ….*'

3.21. Therefore, given the uncertainty surrounding Policy SS13 **there is a risk that the proposals could undermine the conservation objectives for the Lower Derwent Valley SPA and that a likely significant effect cannot be ruled out (alone) and so the policy must be screened in (Category I).**

3.22. It is important to note that this opinion only relates to Policy SS13; adverse impacts from all other policies on the SPA can be screened out.

3.23. Furthermore, this evaluation is only concerned with direct effects from new development. Indirect effects resulting from an increased number of visitors to the site or land nearby is considered separately, under (6) below.

Potential Effects – Recreation

European Sites	Feature
Humber Estuary	Breeding and non-breeding birds
Lower Derwent Valley	All habitats and species
River Derwent	All habitats and species
Skipwith Common	All habitats
Strensall Common	All habitats

Context

3.24. For those European sites around York, adverse ecological effects from recreational pressure is largely limited to walking (frequently with dogs) and associated car parking.

3.25. The most popular destinations can draw in visitors in great numbers from considerable distances and lead to erosion and disturbance. Less popular sites, or those with fewer facilities, have a smaller catchment, fewer visitors and the issue is typically less problematic. Alternatively, sites managed specifically to encourage large numbers of visitors can tolerate these pressures without causing significant harm.

3.26. Excessive pressure typically leads to the disturbance of designated species, and a reduction in habitat quality/extent from trampling. It can be particularly problematic on land with open or unauthorised access where desire lines can be created and so compromise site management.

3.27. In addition, dogs can not only cause localised eutrophication but can also disturb grazing stock, reducing the effectiveness of site management and a decline in the condition of features not normally considered vulnerable.

3.28. As with 'mobile species', all the European site SIPs (Appendix A) list 'disturbance/public access' as a key pressure or threat.

Screening Opinions

3.29. Distance or accessibility remain key factors and in general, where modest residential allocations are situated over 5km from a vulnerable European site, then LSE (alone) can often (but not always) be ruled out. Of course, each site is different and other key factors will include the fragility of the feature, size of the development, the accessibility of alternative destinations, the availability of footpaths, public transport and so on. Of note, all purely employment allocations (except E18 which is situated immediately adjacent to Strensall Common SAC) are excluded from consideration in this category; given the reduced opportunities for workers to visit European sites nearby during the working day any adverse impacts can be screened out, alone.

3.30. In terms of those features on and around the Humber Estuary, given the absence of proposed development nearby, limited access to the foreshore, compounded by private ownership of much of the functionally-linked land **it is considered highly unlikely that any proposals in the Plan could undermine the conservation objectives of the features of the Humber Estuary SPA and SAC and so likely significant effects alone can be screened out (Category G);** a visitor survey in 2012[16] suggested that the median distance travelled by visitors (by car) was just 4.4km.

3.31. Otters are found on the River Derwent and in the Lower Derwent Valley. The evaluation of this issue is similar to that provided for 'mobile species' above. They are clearly associated with waterways throughout the district and populations have been steadily increasing as water quality, in particular, has improved. Otters are typically nocturnal and elusive and although they will range widely in the rivers and adjacent riparian habitats to forage, holts are typically established away from human influence. Given that access to the riverside is effectively (although not entirely) restricted by management measures and private ownership, adverse effects can be ruled out.

3.32. Consequently, it is considered highly unlikely that any proposals in the Plan could undermine the conservation objectives of the otter populations of the River Derwent or Lower Derwent Valley SACs and so likely significant effects (alone) can be screened out (Category G).

3.33. Lamprey and bullhead populations, and floating vegetation communities can be considered immune to recreational pressure. Therefore, **it is considered highly unlikely that any proposals in the Plan could undermine the conservation objectives of lamprey and bullhead**

[16] Fearnley, H, Liley, D. & Cruickshanks, K. (2012). Results of the recreational visitor surveys across the Humber Estuary. Footprint Ecology, unpublished report for Humber Management Scheme

within River Derwent and Humber Estuary SACs and so likely significant effects (alone) can be screened out (Category G).

3.34. Such mitigating factors do not apply to the bird communities and habitats of the Lower Derwent Valley or the fragile heathlands of Skipwith Common and Strensall Common which all remain vulnerable to recreational pressure. Whilst the mechanisms are rather different, the outcomes, in terms of this HRA, are similar and so they are considered together to avoid repetition.

3.35. Taking the Lower Derwent Valley first, this supports diverse, fragile breeding and non-breeding bird populations throughout the year, both within the SPA and on functionally-linked land beyond which are vulnerable to disturbance and displacement. In addition, the terrestrial habitats, especially the grassland communities, are all equally vulnerable to disturbance from public pressure which could result in trampling and erosion.

3.36. Whilst access to much of the SPA is managed and/or restricted, it is not completely controlled. Furthermore, whilst the majority of functionally-linked land is found on private land, access here can also not be fully managed. Consequently, given the location of certain allocations (eg ST33) within a few kilometres of the SPA, adverse effects cannot be ruled out if recreational pressure is to increase considerably.

3.37. This would conflict with the conservation objective for the Lower Derwent Valley SPA to 'ensure that the integrity of the site is maintained by …maintaining … the extent and distribution … the structure and function … and the supporting processes on which the habitats of the qualifying features rely .. the population … and the distribution of the qualifying features ….'.

3.38. However, Policy SS18 has the following embedded mitigation: it ensures that any new development must accord with principle (iv) to '*undertake a comprehensive evidence based approach in relation to biodiversity to address potential impacts of recreational disturbance on the Lower Derwent Valley Special Protection Area (SPA)/Ramsar/SSSI'*.

3.39. This approach should take into account the following measures to reduce demand on the SPA and improve recreational behaviour which would be sufficient to manage the impact and avoid LSE:

- Promotion of alternative, accessible destinations, such as Wheldrake Woods which can be found nearby along with an extensive network of footpaths;
- a survey of visitors to the SPA could provide useful evidence to help target educational efforts
- provision to new homeowners of information that promotes good behaviour within the SPA and encourages use of other, local sites allied to upgraded access routes, facilities and signage to the latter.

3.40. Measures could also be informed by the as yet unpublished Lower Derwent Valley Plan that would promote, with neighbouring local authorities, the development of a shared, landscape-scale solution that could provide real, sustainable landscape, recreation and biodiversity benefits for the Council's residents. East Riding of Yorkshire Council has recently consulted the public on this and are collating responses.

3.41. Adoption of these and similar measures under SS18 (iv) would be sufficient to avoid LSE at the Lower Derwent Valley. There are no residual effects and so no need for an in-combination assessment. Should this be adopted, the impact on the proposed policies is summarised in Table 7 below.

3.42. Therefore, on the basis of (iv) policy SS18 is screened out (Category G).

3.43. Note that Policy H39 promotes development in Elvington just a few hundred metres from the River Derwent and Lower Derwent Valley European sites, albeit over 5km from the most convenient access point at Wheldrake. Given the lack of access locally, the proximity of the allocation is considered to be largely irrelevant. Even where access can be gained, the European site is largely confined to the channel and regarded as resilient to public pressure.

3.44. In terms of the more distant access at Wheldrake, at such distances, localised effects associated with the proximity of development are possible but unlikely. Therefore, it is not included in Category I despite its proximity to the European sites.

3.45. Turning to Skipwith Common SAC, the dry and wet heathland communities are equally vulnerable to recreational pressure. It is a popular site for (dog) walking with the small, local community but limited places to park currently appear to deter larger numbers from further afield. The site is carefully managed as a National Nature Reserve by Natural England and a mosaic of fenced grazing compartments effectively delineate a network of footpaths which largely prevent the damaging trampling of fragile habitats (although some erosion and widening of paths is evident already). That said, even dogs on leads can have the subtle effect of driving grazing stock into cover reducing the effectiveness of essential grazing management. These issues can only be expected to increase if the local population grows considerably.

3.46. The situation is similar at Strensall Common. This large heathland attracts more visitors although access is heavily influenced by a network of footpaths, limited car parking and active management by the Yorkshire Wildlife Trust; regular closure of large parts of the Common by the MOD to allow for firing practice on the adjacent ranges also reduces public pressure. However, both Skipwith and Strensall both host very fragile wet heath habitats which are particularly vulnerable to increases in public pressure brought about by new developments nearby.

3.47. No allocations are found in any proximity to Skipwith whereas SS19 (with 578 dwellings), H59 (45 dwellings) and the large employment allocation of E18 are situated immediately adjacent to the Strensall Common. All three policies have considerable potential to markedly increase public pressure on Strensall Common prompting further trampling, erosion and disturbance of stock and there is no meaningful mitigation embedded within the policy or explanatory text. Consequently, the impact of these policies could conflict with the conservation objective for Strensall Common to '*maintain … the extent and distribution … the structure and function … and the supporting processes … of the qualifying natural habitats ..*'

3.48. Therefore, given the uncertainty surrounding Policies SS19, E18 and H59 there is a risk that the proposals could undermine the conservation objectives for Strensall Common SAC and that a likely significant effect cannot be ruled out (alone) and so the policy must be screened in (Category I).

3.49. It is important to note, however, that this opinion only relates to Policy SS19, E18 and H59 in connection with Strensall Common SAC. Given the absence of proposed development in close proximity to Skipwith Common, **it is considered highly unlikely that any proposals in the Plan could undermine the conservation objectives of the heathland habitats of Skipwith Common SAC and so likely significant effects (alone) can be screened out (Category G).**

3.50. Overall, likely significant effects on qualifying habitats and species from recreational pressure have been screened out on the Humber Estuary (SPA, SAC & Ramsar), River Derwent (SPA and SAC)

and Skipwith Common (SAC). They have also been screened out for otters on the Lower Derwent Valley (and River Derwent) SAC.

3.51. However, likely significant effects cannot be ruled out alone from recreational pressure on the habitats of Strensall Common SAC from Policies SS19, E18 and H59; all are screened in for further scrutiny.

Potential Effects – Air Pollution

European sites	Feature
Lower Derwent Valley	All habitats
River Derwent	Floating vegetation dominated by water crowfoot
Skipwith Common	All habitats
Strensall Common	All habitats

Context

3.52. Both residential and employment development is typically associated with increased traffic and emissions which have been shown to be linked to impacts on vegetation within 200m of the road edge. Beyond this distance, effects become difficult to distinguish from background levels of atmospheric pollutants.

3.53. Where critical loads are shown to be exceeded, further increases are generally considered to avoid LSE (alone) if each increment is below 1%; however, building on recent case law in Sussex[17], residual effects must still be considered in-combination.

3.54. In addition, employment allocations have the potential to generate specific, point-sourced emissions that may or may not adversely affect European sites and that may require specific licensing by the EA. As no information is provided on the latter, it is assumed that for this stage in the assessment process, that no such processes are proposed.

3.55. Consequently, the additional contributions that might arise from increased traffic are only likely to be significant where the site is known to be sensitive to such effects and where the appropriate critical loads and levels are either exceeded or approaching exceedance.

3.56. Despite this assessment, Natural England's SIPs (Appendix 1A) only identified air pollution as a key pressure or threat for Skipwith Common and Strensall Common.

Screening opinion

3.57. It is assumed that no major point sources of airborne pollution are promoted by this Plan and accordingly, all employment allocations are treated as relatively benign, in air quality terms, allowing consideration of residential and employment proposals side by side.

3.58. Although the River Derwent, Lower Derwent Valley, Skipwith Common and Strensall Common European sites all lie in rural locations, all are found in close proximity to a network of roads – one minor right of way even runs through Skipwith Common. Potentially, these could exert an influence on the range of designated features on all four sites.

3.59. Proposals for dairy, pig and poultry units which may well fall outside this category may be more problematic and are not considered here but may well require the development of specific policies in due course.

[17] Wealden District Council v Secretary of State for Communities and Local Government, Lewes District Council and the South Downs National Park Authority (Defendants) and Natural England (Interested Party) [2017] EWHC 351 (Admin). 20th March 2017.

3.60. The site assessments below rely heavily on information drawn from the Air Pollution Information System (APIS)[18]:

River Derwent

3.61. None of the features habitats, otter, fish) of the River Derwent benefit from identified critical loads although all are known to be sensitive to nitrogen deposition and acidification.

3.62. APIS data for the River Derwent projected that in 2020 only 5% of the overall nitrogen contribution would be caused by road traffic. Although often an underestimate, this strongly suggests the contribution from road traffic will be minor. Furthermore, although the site is very long, roads of any magnitude within 200m of the river (such as the A1079) are few and far between and largely restricted to occasional river crossings (and lie outside the District). Despite this, meso/eutrophic systems like the Derwent are often phosphate limited providing a clear relationship with wastewater and other sources/discharges and may make the system more vulnerable. However, high nutrient loads within the river make it resilient to the effects of any increases caused by airborne pollution.

3.63. Given these mitigating factors, it is considered almost inconceivable, given the scale of overall development, that traffic associated with individual or multiple allocations will have an adverse impact on the River Derwent and LSE alone can be ruled out.

3.64. Given these mitigating factors, **it is considered highly unlikely that any proposals in the Plan could undermine the conservation objectives of the features of the River Derwent SAC and so likely significant effects (alone) can be screened out (Category G).**

Lower Derwent Valley SPA and SAC

3.65. The critical loads identified for the habitat of the qualifying breeding and wintering birds struggle to relate to the habitats at the SPA as they tend to describe the more typically associated upland and coastal communities of these species. We consider that use of these would lead to a flawed outcome.

3.66. However, by adopting figures for the low altitude hay meadows, critical loads of 20-30 $kgNha^{-1}yr^{-1}$ are found. Both the critical loads for nitrogen deposition and acidity are already and clearly exceeded.

3.67. Although emissions of NOx from road traffic contribute primarily to local levels of acidity, they make only a limited contribution to local nitrogen deposition and the 2020 projection for overall nitrogen contribution for the LDV SPA and SAC is only 4.6%. As the LDV occupies a similar geography to the River Derwent the same issues regarding the absence of nearby roads also applies. In addition, the site is manged for nature conservation and any tendency for the encouragement of coarse grasses etc will be effectively managed on site. Furthermore, this site is subject to regular flooding which will contribute far greater amounts of nitrogen to the habitat than air pollution and is regarded as a part of the functioning of the (semi-) natural system.

3.68. Given these mitigating factors, **it is considered highly unlikely that any proposals in the Plan could undermine the conservation objectives (alone or in combination) of the features of the Lower Derwent Valley European site and so likely significant effects can be screened out (Category G).**

Skipwith Common

3.69. Values for nitrogen deposition at Skipwith lie midway between the minimum and maximum range of 20-30 $kgNha^{-1}yr^{-1}$ and likewise for acidity.

[18] http://www.apis.ac.uk/

3.70. As for the Lower Derwent Valley above, the 2020 projection for the site is 6.9% of total contributions. However, the SAC is bordered to the east by a minor road (and although the site is bisected by a public road, it is impassable to most vehicles). Although road traffic can increase nitrogen concentrations over wide areas, nitrogen deposition is usually restricted to very short distances, just a few metres in many cases, especially when restricted by roadside vegetation.

3.71. If effects from the minor road within the site are dismissed because of the tiny volume of traffic, so too can effects from the road to the east. The boundary of the European site comprises woodland and is not representative of the heathland qualifying habitats. It is highly unlikely that increased road traffic emissions will lead to adverse effects and the conservation objectives would not be undermined. When it is considered that there are no allocations near Skipwith and that increase in recreational pressure impacts have been dismissed then increases in traffic will be correspondingly low.

3.72. Given these mitigating factors, **it is considered highly unlikely that any proposals in the Plan could undermine the conservation objectives (alone or in combination) of the features of Skipwith Common SAC and so likely significant effects can be screened out (Category G).**

Strensall Common

3.73. Values for nitrogen deposition (22 $kgNha^{-1}yr^{-1}$) at Strensall clearly exceed the critical loads of 10-20 $kgNha^{-1}yr^{-1}$ whereas figures for acidity lie midway. Like Skipwith this too is bisected by a properly surfaced but still relatively minor road in the north.

3.74. No allocations are expected to increase usage of this road so air pollution impacts can focus on the three policies SS19, E18 and H59 that together will bring over 600 dwellings and a 4ha employment area respectively, to land immediately adjacent to the south-western corner of the SAC. Although the effects of nitrogen deposition can be discounted beyond 200m, the potential exists for a large number of vehicles to be brought in close proximity to the SAC and for eutrophication of the heathland community prompting a decline in diversity amongst other impacts. No meaningful mitigation is proposed.

3.75. This would conflict with the conservation objective for Strensall Common to *'maintain … the extent and distribution … the structure and function … and the supporting processes … of the qualifying natural habitats ..'*

3.76. Consequently, given the scale and location of the proposals allied with the lack of mitigation, **there is a risk that the proposals could undermine the conservation objectives for Strensall Common SAC and that a likely significant effect cannot be ruled out (alone) and so these policies must be screened in (Category I).**

Overall Screening Outcomes

3.77. In terms of impact type, the outcomes of this stage of the formal screening assessment are brought together in Table 5 whilst Table 6 presents the same outputs but in terms of category.

Table 5: Summary of the Formal Screening of the Policies and Allocations by impact

Potential effects	Outcome of screening assessment
2 Aquatic Environment	Likely significant effects cannot be ruled out alone on Strensall Common with regard to Policies SS19, E18 and H59

Potential effects	Outcome of screening assessment
	No other effects are anticipated and all remaining policies have been screened out All other sites and all other policies have been screened out The outcome of the screening of each, individual allocation, is presented in Appendix B and summarised in Table 6 below.
5 Mobile species	Likely significant effects cannot be ruled out alone on the Lower Derwent Valley SPA with regard to Policy SS13 No other effects are anticipated on any other European sites and all other remaining policies have been screened out The outcome of the screening of each, individual allocation, is presented in Appendix B and summarised in Table 6 below.
6 Recreation	Likely significant effects cannot be ruled out alone on Strensall Common SAC with regard to Policies SS19, E18 and H59 No other effects are anticipated on any other European sites and all other remaining policies have been screened out The outcome of the screening of each, individual allocation, is presented in Appendix B and summarised in Table 6 below.
7d Air pollution	Likely significant effects cannot be ruled out alone on Strensall Common with regard to Policies SS19, E18 and H59 No other effects are anticipated and all remaining policies have been screened out The outcome of the screening of each, individual allocation, is presented in Appendix B and summarised in Table 6 below.

3.78. Note, that to avoid confusion between housing policies and allocations which share the same names, eg H3, actual allocations have been renamed with an '(A)' eg H3(A) and housing policies with a '(P) eg H3(P). This nomenclature is followed throughout the rest of this HRA.

Table 6: Summary of the Formal Screening of the Policies and Allocations by Category

Screening outcome	Policies
A General statement of policy Screened out	DP1 SS2 ED1
B General criteria for testing acceptability of proposals Screened out	DP2, DP3, DP4, SS1 EC1, EC2 R1, R2, R3, R4 H1(P), H2(P), H3(P), H4(P), H8(P), H9(P), H10(P) HW1, HW2, HW3, HW4, HW5, HW7 ED6, ED8 D1, D2, D3, D4, D5, D6, D7, D8, D9, D10, D11, D12, D13, D14 GI5, GI6, GI7, GB1, GB2, GB3 CC1, CC2, CC3, ENV3, ENV4, ENV5 T1, T7, T8
C	WM1, WM2

Screening outcome	Policies
Proposal referred to but not proposed by the Plan Screened out	
D Environmental protection policy Screened out	GI1, GI2, GI3, GI4, ENV1, ENV2
G No conceivable effect on a European site Screened out	SS3, SS4, SS5, SS6, SS7, SS8, SS9, SS10, SS11, SS12, SS14, SS15, SS16, SS17, SS18, SS20, SS21, SS22, SS23, SS24 EC3, EC4, EC5 E8, E9, E10, E11, E16 H5(P), H6(P), H7(P) H1a(A), H2b(A), H3(A), H5(A), H6(A), H7(A), H8(A), H10(A), H20(A), H22(A), H23(A), H29(A), H31(A), H38(A), H39(A), H46(A), H52(A), H53(A), H55(A), H56(A), H58(A), SH1 HW6 ED2, ED3, ED4, ED5, ED7 GB4, T2, T3, T4, T5, T6, T9, T10 C1
I Likely significant effect alone cannot be ruled out Screened in	SS13, SS19, E18 H59(A)
J Likely significant effect in combination cannot be ruled out Screened in	None

Screening Conclusions and Next Steps

3.79. This exercise found that it was not possible to rule out LSE alone (Category I) for Policies SS13, SS19, E18 and H59 for a range of possible but credible impacts including impact on/from the aquatic environment, mobile species, recreational pressure and air pollution.

3.80. However, all other policies and allocations were screened out of further scrutiny within the HRA (Categories A-G).

3.81. These conclusions have drawn on all mitigation measures, if any, that were embedded in the policies but given these outcomes it would not be possible to adopt the Plan in its current form. Consequently, this HRA must now explore what additional measures could be adopted to produce a more favourable outcome.

4. Mitigation

4.1. Given that LSE cannot be ruled out across a range of factors and a number of European sites, the HRA must now evaluate the effectiveness of possible mitigation measures. The threats were provided by impacts resulting from recreational pressure, air pollution and impacts on the aquatic environment. These are discussed in turn below:

Recreational Pressure

4.2. Policies SS19, E18 and H59 promote development in close proximity to Strensall Common, in relation to trampling and erosion.

4.3. **In terms of SS19, E18 and H59 at Strensall Common, t**he proposed residential and employment developments are situated immediately adjacent to the SAC. This level of development (623 dwellings and a 4ha employment park) will bring similar impacts as described above with increased trampling and erosion by humans, allied with eutrophication and disturbance of grazing stock by dogs, especially those off the lead.

4.4. Educational initiatives (as proposed at the Lower Derwent Valley) will help but cannot be regarded as sufficient alone given the scale of both allocations. Similarly, alternative greenspaces nearby are not immediately obvious and would require roads to be crossed making them less attractive and less viable as effective mitigation. Furthermore, given the density of housing proposed, it appears there is little prospect for the creation of alternative greenspace on site.

4.5. At this stage, it is clearly apparent that the obvious destination for outdoor recreation will be the SAC. Proposals for a connecting road between SS19 and E18 would lead to further harm by facilitating more access to the SAC. Such requirements will require re-visiting during any future iteration of this policy.

4.6. Bearing in mind the strategic nature of this plan (and the lessons of Feeney[19]), the difficulty of making a meaningful evaluation of this policy with the limited information available, ensures that **no mitigation can be applied, the conclusion of LSE alone remains and an appropriate assessment is required**. With its demands for greater evidence, it may be possible to find and identify mitigation at that point. This will be pursued in due course in a separate document if these policies remain. Consequently, Table 7 remains unaltered for this factor for Policies SS19, E18 and H59.

4.7. However, whilst in no way affecting the conclusion of LSE alone or prejudicing the appropriate assessment, it is possible to recommend that these policies still need to be informed by further evidence regarding design and human behaviour; for instance, a visitor survey across Strensall Common may provide additional, useful information. These requirements should be added to these policies and the explanatory text.

Aquatic Environment

4.8. Policies SS19, E18 and H59 promote residential and employment development immediately adjacent to Strensall Common. This SAC supports fragile wet heath habitats with a restricted distribution across the UK and beyond. It is particularly vulnerable to changes in the surface and sub-surface hydrological regime, impacts which can easily be prompted by large-scale construction nearby.

[19] 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

4.9. Bearing in mind the strategic nature of this plan (and the lessons of Feeney), the difficulty of making a meaningful evaluation of this policy with the limited information available, ensures that **no mitigation can be applied, the conclusion of LSE alone remains and an appropriate assessment is required**. With its demands for greater evidence, it may be possible to find/identify mitigation at that point. This will be pursued in due course in a separate document if these policies remain. Consequently, Table 7 remains unaltered for this factor for Policies SS19, E18 and H59.

4.10. However, whilst in no way affecting the conclusion of LSE alone or prejudicing the appropriate assessment, it is possible to recommend that these policies still need to be informed by the outputs of a hydrological survey that evaluates the impacts of construction of the wet heath habitats. This requirement should be added to these policies and the explanatory text.

Air pollution

4.11. Policies SS19, E18 and H59 promote residential and employment development immediately adjacent to Strensall Common. This SAC supports fragile heathland communities with a restricted distribution across the UK and beyond. They are particularly vulnerable to elevated levels of nitrogen deposition from increased road traffic associated with new development and the SAC already exceeds the critical loads for nitrogen.

4.12. Although the effects of nitrogen *deposition* from cars can be discounted beyond 200m from roads the introduction of 578 dwellings (SS19) and 45 dwellings (H59), each with multiple cars allied to daily movements of the workforce (E18) will be measurable over a large swathe of the SAC, especially, as currently proposed, there is no break between the development and the SAC.

4.13. Bearing in mind the strategic nature of this plan (and the lessons of Feeney), the difficulty of making a meaningful evaluation of this policy with the limited information available ensures that **no mitigation can be applied, the conclusion of LSE alone remains and an appropriate assessment is required**. With its demands for greater evidence, it may be possible to identify mitigation at that point. This will be pursued in due course in a separate document if these policies remain. Consequently, Table 7 remains unaltered for this factor for Policies SS19, E18 and H59.

4.14. However, whilst in no way affecting the conclusion of LSE alone or prejudicing the appropriate assessment, it is possible to recommend that these policies still need to be informed by the outputs of an air quality survey that evaluates the impacts of road traffic (and perhaps other emissions from the employment area) on the heathland habitats. This requirement should be added to these policies and the explanatory text.

Mobile species

4.15. Policy SS13 promotes a major new settlement several kilometres to the north-west of the Lower Derwent Valley SPA. Extensive mitigation, largely in the form of habitat creation is already required as part of the policy wording although this is only designed to address local impacts. However, recent ornithological studies have suggested that the site and its environs regularly support considerable numbers of both golden plover and lapwing, both identified as components of the non-breeding bird assemblage of the SPA.

4.16. Mitigation for local habitat loss and ‘resident’ bird communities is not necessarily the same as that for these waders and new measures will probably be required perhaps in a different location away from the disturbance of the new settlement. No suitable measures have been proposed for wintering waders so far.

4.17. Bearing in mind the strategic nature of this plan (and the lessons of Feeney), the difficulty of making a meaningful evaluation of this policy with the limited information available ensures **that no mitigation can be applied, the conclusion of LSE alone remains and an appropriate assessment is required**. With its demands for greater evidence, it may be possible to identify mitigation at that point. This will be pursued in due course in a separate document if this policy remains. Consequently, Table 7 remains unaltered for this factor for Policy SS13.

4.18. However, whilst in no way affecting the conclusion of LSE alone or prejudicing the appropriate assessment, it is possible to recommend that this policy still needs to be informed by ongoing ornithological surveys that evaluates the impact on wintering waders and is used to identify bespoke mitigation measures. This requirement should be added to both the policy and the explanatory text.

European site protection

4.19. The local plan lacks an effective European site protection policy. Whilst such a policy should not and frankly cannot be relied upon to make harmful policies acceptable, (such tensions should always be resolved by amending or even removing the offending policy) it can bring the importance of protecting European sites to the attention of all and bring support to mitigation measures embedded in the plan.

4.20. We note that Policy GI2 (vi) addresses strategic water quality and wastewater issues in relation to European sites.

4.21. So, whilst a general 'European site' policy cannot form a mitigation measure on its own the following new policy is recommended for addition to the Plan:

Recommended European site protection policy
Where a proposal for development would result in significant harm to a Special Area of Conservation, a Special Protection Area or a Ramsar site which cannot be avoided, mitigated or compensated, then planning permission will be refused.

Mitigation Summary

4.22. The impact of each of the proposed mitigation measures on the individual factors at play is summarised in Table 7 below for each individual policy/allocation. **Although the majority of policies could now be screened out of the HRA, unresolved issues remain in terms of Policies SS13, SS19, E13 and H59.**

Table 7: Summary of Formal Screening Exercise after Adoption of Recommended Mitigation

Screening outcome	Policies
A General statement of policy Screened out	DP1 SS2 ED1
B General criteria for testing acceptability of proposals Screened out	DP2, DP3, DP4, SS1 EC1, EC2 R1, R2, R3, R4 H1(P), H2(P), H3(P), H4(P), H8(P), H9(P), H10(P)

Screening outcome	Policies
	HW1, HW2, HW3, HW4, HW5, HW7 ED6, ED8 D1, D2, D3, D4, D5, D6, D7, D8, D9, D10, D11, D12, D13, D14 GI5, GI6, GI7 GB1, GB2, GB3 CC1, CC2, CC3 ENV3, ENV4, ENV5 T1, T7, T8
C Proposal referred to but not proposed by the Plan Screened out	WM1, WM2
D Environmental protection policy Screened out	GI1, GI2, GI3, GI4, ENV1, ENV2,
G No conceivable effect on a European site Screened out	HW6 T2, T3, T4, T5, T10 C1 SS3, SS4, SS5, SS6, SS7, SS8, SS9, SS10, SS11, SS12, SS14, SS15, SS16, SS17, SS18, SS20, SS21, SS22, SS23, SS24 EC3, EC4, EC5 E8, E9, E10, E11, E16 H5(P), H6(P), H7(P), H1a(A), H2b(A), H3(A), H5(A), H6(A), H7(A), H8(A), H10(A), H20(A), H22(A), H23(A)???, H29(A), H31(A), H38(A), H39(A), H46(A), H52(A), H53(A), H55(A), H56(A), H58(A), SH1 ED2, ED3, ED4, ED5, ED7 GB4, T6, T9
I Likely significant effect alone cannot be ruled out Screened in	SS13, SS19, E18 H59
J Likely significant effect in combination cannot be ruled out Screened in	None

4.23. The issues, recommended mitigation measures and outcomes are summarised in the Table 8.

Table 8: Summary of Formal Screening Exercise after Adoption of Recommended Mitigation

Issue	Recommended mitigation	Outcome
Recreational pressure Strensall Common Policies SS19, E18 and H59	Add requirements for visitor behaviour, hydrological and air quality evaluations to policy and explanatory text	Mitigation not sufficient to change conclusion: LSE alone cannot be ruled out Appropriate assessment required
Aquatic environment Strensall Common Policies SS19, E18 and H59	Need for hydrological survey to evaluate the impacts of construction to be added to both and explanatory text	Mitigation not sufficient to change conclusion: LSE alone cannot be ruled out Appropriate assessment required
Air pollution Strensall Common Policies SS19, E18 and H59	Need for air quality survey to evaluate the impacts of occupation of the site to be added to both and explanatory text	Mitigation not sufficient to change conclusion: LSE alone cannot be ruled out Appropriate assessment required
Mobile species Lower Derwent Valley Policy SS13	Need for ongoing ornithological survey to evaluate impact of allocation and to identify suitable mitigation measures to be added to both the policy and explanatory text	Mitigation not sufficient to change conclusion: LSE alone cannot be ruled out Appropriate assessment required
Lack of adequate European site protection policy	Adoption of new European site protection policy	N/A

5. Overall Screening Conclusion

5.1. 138 policies and allocations were screened; the individual outcomes of the first exercise without the benefit of mitigation can be found in Tables 5 & 6, and in Appendix B. Tables 7 and 8 capture the outcomes post-mitigation.

5.2. Overall, this HRA found that LSE could be ruled out for 133 policies which could therefore be excluded from any further scrutiny.

5.3. However, LSE for five policies could not be ruled out alone. Policies SS19, E18 and H59 were found to cause a LSE alone across a range of factors on the adjacent Strensall Common. Similarly, because of anticipated increases in recreational pressure, Policy SS18 was found to cause a LSE alone on the Lower Derwent Valley. Finally, even though situated several kilometres from the Lower Derwent Valley, Policy SS13 was found to cause a LSE on its wintering bird populations that also use land beyond the European site boundary.

5.4. Mitigation was only found to be effective in terms of Policy SS18 where the LSE alone could be avoided.

5.5. However, at this stage in the plan, it was not found possible to mitigate policies SS19, E18, H59 or SS13 and these will need to be subjected to an appropriate assessment. Because of these outstanding issues, the Plan must await the outcome of this further scrutiny.

APPENDICES

A. Conversation objectives and Site Improvement Plans for European sites.

Lower Derwent Valley SPA	
Conservation objectives[20]	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.
Lower Derwent Valley SAC	
Conservation objectives[21]	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; • The extent and distribution of qualifying natural habitats and habitats of qualifying species; • The structure and function (including typical species) of qualifying natural habitats; • The structure and function of the habitats of qualifying species; • The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely; • The populations of qualifying species, and, • The distribution of qualifying species within the site.
SIP pressures and threats (SPA and SAC)[22]	• Hydrological changes; • Drainage; • Public access/Disturbance; • Invasive species; • Undergrazing; • Inappropriate scrub control.
River Derwent SAC	
Conservation objectives[23]	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring: • The extent and distribution of qualifying natural habitats and habitats of qualifying species; • The structure and function (including typical species) of qualifying natural habitat; • The structure and function of the habitats of qualifying species; • The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely;

[20] European Site Conservation Objectives for Lower Derwent Valley SPA, Natural England, 30 June 2014 (Version 2)
[21] European Site Conservation Objectives for Lower Derwent Valley SAC, Natural England (undated)
[22] Lower Derwent Valley Site Improvement Plan, Natural England, v1.0, 6 October 2014
[23] European Site Conservation Objectives for River Derwent Valley SAC, Natural England, 30 June 2014 (Version 2)

	• The populations of qualifying species, and, • The distribution of qualifying species within the site.
SIP pressures & threats	• Physical modification; • Water pollution; • Invasive species; • Change in land management; • Water abstraction.

Skipwith Common SAC	
Conservation objectives[24]	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; • The extent and distribution of the qualifying natural habitats; • The structure and function (including typical species) of the qualifying natural habitats and, • The supporting processes on which the qualifying natural habitats rely.
SIP pressures & threats[25]	• Public access/Disturbance; • Inappropriate scrub control; • Drainage; • Air pollution: impact of atmospheric nitrogen deposition.

Strensall Common SAC	
Conservation objectives[26]	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; • The extent and distribution of the qualifying natural habitats; • The structure and function (including typical species) of the qualifying natural habitats and, • The supporting processes on which the qualifying natural habitats rely.
SIP pressures & threats[27]	• Public access/Disturbance; • Inappropriate scrub control; • Air pollution: impact of atmospheric nitrogen deposition.

Humber Estuary SPA	
Conservation objectives[28]	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.

[24] European Site Conservation Objectives for Skipwith Common SAC, Natural England, 30 June 2014 (Version 2)
[25] Skipwith Common Site Improvement Plan, Natural England, v1.0, 18 December 2014
[26] European Site Conservation Objectives for Skipwith Common SAC, Natural England, 30 June 2014 (Version 2)
[27] Skipwith Common Site Improvement Plan, Natural England, v1.0, 18 December 2014
[28] European Site Conservation Objectives for the Humber Estuary SPA, Natural England, 30 June 2014 (Version 3)

Humber Estuary SAC	
Conservation objectives[29]	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring: • The extent and distribution of qualifying natural habitats and habitats of qualifying species; • The structure and function (including typical species) of qualifying natural habitats; • The structure and function of the habitats of qualifying species; • The supporting processes on which qualifying natural habitats and habitats of qualifying species rely; • The populations of qualifying species; and, • The distribution of qualifying species within the site.
SIP pressures[30]	• Water pollution; • Coastal squeeze; • Changes in species distributions; • Undergrazing; • Invasive species; • Natural changes to site conditions; • Public access/Disturbance; • Fisheries: Fish stocking; • Fisheries: Commercial marine and estuarine (P); • Fisheries: Commercial marine and estuarine (T); • Direct and take from development; • Air pollution: impact of atmospheric nitrogen deposition; • Shooting/scaring; • Direct impact from third party; • Inappropriate scrub control; • Fisheries: Commercial marine and estuarine (T); • Direct and take from development; • Air pollution: impact of atmospheric nitrogen deposition; • Shooting/scaring; • Direct impact from third party; • Inappropriate scrub control.

[29] European Site Conservation Objectives for the Humber Estuary SAC, Natural England, 31 March 2014 (Version 2)
[30] Humber Estuary Site Improvement Plan, Natural England, v1.1, 8 July 2015

B. Record of preliminary screening of proposed policies prior to mitigation

Policy	Rationale	Screening outcome
DP1 York Sub Area	This policy represents a vision or aspirations for the City. It does not directly lead to development and so can have no effects on European sites.	A – Screened out
DP2 Sustainable Development	This policy draws on the NPPF to describe the presumption in favour of sustainable development before identifying broad principles for development. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
DP3 Sustainable communities	This policy identifies broad social criteria for evaluating development proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
DP4 Development management	This policy again refers to the presumption in favour of sustainable development before identifying tests for proposals that apply if the proposals lie outside the Plan. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
SS1 Sustainable Growth	This policy identifies high level housing and employment targets but does not identify development sites, instead identifying broad principles for development. It does not directly lead development and so can have no effects on European sites. Individual housing and employment allocations are considered in under their specific, respective policies.	B – Screened out
SS2 Green Belt	This policy identifies the extent and role of the Green Belt without adding criteria for development proposals. It does not directly lead to development and so can have no effects on European sites.	A – Screened out
SS3 York City Centre	This policy makes provision for development within York City Centre (ST5, ST20, ST32) which is situated far from the nearest European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by Policy GI2 (vi). No other impacts are anticipated.	G – Screened out
SS4 York Central	This policy makes provision for the development within York Central (ST5) which is situated far from the nearest European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by Policy GI2 (vi). No other impacts are anticipated.	G – Screened out
SS5 Castle Gateway	This policy makes provision for the development within York Central (ST20) which is situated far from the nearest European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by. Policy GI2 (vi). No other impacts are anticipated.	- G- Screened out

Policy	Rationale	Screening outcome
SS6 British Sugar	This policy makes provision for the development of this urban site (ST1) which is situated far from the nearest European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by Policy GI2 (vi). No other impacts are anticipated.	– G - Screened out
SS7 CS Sports Ground	This policy makes provision for the development of this urban site (ST2) which is situated far from the nearest European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by Policy GI2 (vi). No other impacts are anticipated.	G - Screened out
SS8 Land adjacent to Hull Road	This policy makes provision for the development of this urban extension site (ST4) which is situated over 10km by road from the most convenient access point to the nearest European site, the Lower Derwent Valley. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by Policy GI2 (vi). No other impacts are anticipated.	G – Screened out
SS9 East of Metcalfe Lane	This policy makes provision for the development of this garden village (ST7) which is situated over 15km by road from the most convenient access point to the nearest European site, the Lower Derwent Valley. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by Policy GI2 (vi). No other impacts are anticipated.	G – Screened out
SS10 North of Monks Cross	This policy makes provision for the development of this urban extension site (ST8) which is situated less than 5km by road from the most convenient access point to the nearest European site, Strensall Common. At such distances localised effects associated with the proximity of development (ie recreational pressure) are possible but avoided by the greenspace required as part of this allocation. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by Policy GI2 (vi). No other impacts are anticipated.	G – Screened out
SS11 North of Haxby	This policy makes provision for the development of this urban extension site (ST9) which is situated less than 5km by road from the most convenient access point to the nearest European site, Strensall Common. At such distances localised effects associated with the proximity of development (ie recreational pressure) are possible but avoided by the greenspace required as part of this allocation. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vi).	G – Screened out

Policy	Rationale	Screening outcome
	No other impacts are anticipated.	
SS12 West of Wigginton Road	This policy makes provision for the development of this garden village (ST14) which is situated approximately 7km by road from the most convenient access point to the nearest European site, Strensall Common. At such distances localised effects associated with the proximity of development (ie recreational pressure) are possible but avoided by the greenspace required as part of this allocation. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by Policy GI2 (vi). No other impacts are anticipated.	G – Screened out
SS13 West of Elvington Lane	This policy makes provision for the development of this new settlement (ST15) which is situated approximately 7km by road from the most convenient access point to the nearest European site, the Lower Derwent Valley SPA. At such distances localised effects associated with the proximity of development (ie recreational pressure) are possible but expected to be avoided by the open space and new Nature Conservation Areas required as part of this allocation. However, this development is believed to directly affect large numbers (perhaps up to 5%) of the non-breeding golden plover and lapwing populations of the SPA which utilise 'functionally-linked' land far beyond the boundaries of the designated site. Given the lack of bespoke mitigation to accommodate wintering birds from the SPA, LSE alone cannot be ruled out. In contrast, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vi).	I – Screened in LSE alone
SS14 Terry's Extension (1&2)	This policy makes provision for the development of this urban development site (ST16) which is situated far from the nearest European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vi). No other impacts are anticipated.	G – Screened out
SS15 Nestle South	This policy makes provision for the development of this urban development site (ST17) which is situated far from the nearest European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out policy GI2 (vi). No other impacts are anticipated.	G - Screened out
SS16 Tadcaster Road	This policy makes provision for the development of this urban extension site (ST31) which is situated far from the nearest European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vi). No other impacts are anticipated.	G – Screened out
SS17	This policy makes provision for the development of this urban development site (ST32) which is situated far from the	

Policy	Rationale	Screening outcome
Hungate	nearest European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out policy GI2 (vi). No other impacts are anticipated.	G – Screened out
SS18 Station Yard Wheldrake	This policy makes provision for the development of this village extension site (ST33) which is situated just a few hundred metres from the most convenient access point to the nearest European site, the Lower Derwent Valley. At such distance, prior to mitigation LSE alone from recreational pressure cannot be ruled out. However, the policy states that development must comply with the following principle: Undertake a comprehensive evidence based approach in relation to biodiversity to address potential impacts of recreational disturbance on the Lower Derwent Valley Special Protection Area (SPA)/Ramsar/SSSI. With such embedded mitigation, the policy is screened out. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by Policy GI2 (vi).	G- Screened out
SS19 Queen Elizabeth Barracks	This policy makes provision for the development of this rural development site (ST35) which is situated adjacent to the Strensall Common. At such close proximity, especially as no meaningful avoidance or mitigation measures are put forward in the policy or explanatory text, LSE alone from recreational pressure cannot be ruled out. In addition, possible change to the local hydrological regime from construction means that LSE alone on the ('aquatic') wet heath communities cannot be ruled out. Furthermore, increased road traffic associated with 578 new houses may increase nitrogen deposition within the SAC ensuring that LSE alone in terms of air pollution cannot be ruled out. In contrast, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vi).	I/J – Screened in LSE alone
SS20 Imphal Barracks	This policy makes provision for the development of Imphal Barracks in York (ST36) which is situated far from the nearest European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vi). No other impacts are anticipated.	G – Screened out
SS21 Land South of Elvington Airfield	This policy makes provision for the establishment of this business park (ST26) which is situated approximately 7km by road from the most convenient access point to the nearest European site, the Lower Derwent Valley. At such distances localised effects associated with the proximity of development (ie recreational pressure) are possible but avoided by the business use of the site which will ensure that both the modest workforce will have limited opportunities to visit the European site. Furthermore, strategic issues, such	G – Screened out

Policy	Rationale	Screening outcome
	as the disposal of wastewater are effectively screened out by policy GI2 (vi). No other impacts are anticipated.	
SS22 York University Expansion	This policy makes provision for the expansion of the University (ST27) which is situated around 13km by road from the most convenient access point to the nearest European site, the Lower Derwent Valley. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vi). No other impacts are anticipated.	G – Screened out
SS23 Northminster Business Park	This policy makes provision for the establishment of this business park (ST19) which is situated far from the nearest European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vi). No other impacts are anticipated.	G – Screened out
SS24 Whitehall Grange	This policy makes provision for the establishment of this business park (ST37) which is situated far from the nearest European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vi). No other impacts are anticipated.	G – Screened out
EC1 Employment land	This policy brings together a range of employment allocations together providing a brief description. Given the lack of detail this policy cannot directly lead to development and so can have no effect on European sites. The individual allocations ST5, ST19, ST27, ST26 & ST37, and E8, E9, E10, E11, E16 & E18 are more effectively evaluated individually elsewhere either under specific policies or as individual allocations respectively.	B – Screened out
E8	This policy makes provision for light industrial development and research within Wheldrake (E8) which is situated only around 2km from a convenient access point to the Lower Derwent Valley. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vi). No other impacts are anticipated.	G – Screened out
E9	This policy makes provision for light industrial development and research within Elvington (E9) which is situated far from the nearest European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vi). No other impacts are anticipated.	G – Screened out

Policy	Rationale	Screening outcome
E10	This policy makes provision for light industrial development within Dunnington (E10) which is situated far from the nearest, European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vi). No other impacts are anticipated.	G – Screened out
E11	This policy makes provision for light industrial development and research within Monks Cross (E11) which is situated several kilometres from the nearest European site. At such distances localised effects associated with the workforce from the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vi). No other impacts are anticipated.	G – Screened out
E16	This policy makes provision for light industrial development near Monks Cross (E11) which is situated several kilometres from the nearest European site. At such distances localised effects associated with the workforce from the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vi). No other impacts are anticipated.	G – Screened out
E18	This policy makes provision for unspecified employment development adjacent to Strensall Common SAC (E18). At such distance, especially as no meaningful avoidance or mitigation measures are put forward in the policy or explanatory text, LSE alone from recreational pressure cannot be ruled out. In addition, possible change to the local hydrological regime from construction means that LSE alone on the wet heath communities cannot be ruled out. Furthermore, increased road traffic associated with the workforce may increase nitrogen deposition within the SAC ensuring that LSE alone cannot be ruled out; as the employment type is unknown, this may also include aerial emissions from any industrial processes proposed. In contrast, strategic issues, such as the disposal of wastewater are effectively screened out policy GI2 (vi).	I – Screened in LSE alone
EC2 Loss of employment land	This policy aims to safeguard employment land before identifying criteria to evaluate development proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
EC3 Business within Residential Areas	This policy encourages development in unknown locations. The scale and nature of this type of development make it highly unlikely that direct impacts on European sites would result and strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vi). No other impacts are anticipated.	G – Screened out

Policy	Rationale	Screening outcome
EC4 Tourism	This policy encourages development in unknown locations. The scale and nature of this type of development make it highly unlikely that direct impacts on European sites would result and strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vi). No other impacts are anticipated.	G – Screened out
EC5 Rural economy	This policy encourages development in unknown locations. The scale and nature of this type of development make it highly unlikely that direct impacts on European sites would result and strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vi). No other impacts are anticipated.	G – Screened out
R1 Retail hierarchy	This policy seeks to safeguard retail provision in the city centre before identifying criteria to evaluate development proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
R2 Local centres	This policy seeks to safeguard retail provision in the local centres before identifying criteria to evaluate development proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
R3 City centre retail	This policy seeks to support retail provision in the city centre before identifying criteria to evaluate development proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
R4 Out of town retail	This policy seeks to influence out of town retail provision by identifying criteria to evaluate development proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
H1(P)	This policy brings together a range of employment allocations together providing a brief description. Given the lack of detail this policy cannot directly lead to development and so can have no effect on European sites. The individual allocations ST1, 2, 4, 5, 7, 8, 9, 14, 15, 16, 17, 31, 32, 33, 35 & 36, and H1a, 2b, 3, 5, 6, 7, 8, 10, 20, 22, 23, 29, 31, 38, 39, 46, 52, 53, 55, 56, 58, 59 are more effectively evaluated individually elsewhere either under specific policies or as individual allocations respectively.	B – Screened out
H2(P) Residential density	This policy seeks to influence the density of housing by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
H3(P) Housing market	This policy seeks to balance the housing market by identifying criteria to influence the housing mix. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
H4(P) Self-build	This policy seeks to influence the types and design of housing by identifying criteria to encourage self-build proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out

Policy	Rationale	Screening outcome
H5(P) Gypsies & travellers	This policy encourages development in unknown locations. The scale and nature of this type of development make it highly unlikely that direct impacts on European sites would result and strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vi). No other impacts are anticipated.	G – Screened out
H6(P) Travelling showpeople	This policy encourages development in unknown locations. The scale and nature of this type of development make it highly unlikely that direct impacts on European sites would result and strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vi). No other impacts are anticipated.	G – Screened out
H7(P) Student housing	This policy encourages development in unknown locations. The scale and nature of this type of development make it highly unlikely that direct impacts on European sites would result and strategic issues, such as the disposal of wastewater are effectively screened out policy GI2 (vi). No other impacts are anticipated. The named allocation, SH1, is evaluated as a single allocation elsewhere in this table.	G – Screened out
H8(P) Multi-occupation	This policy seeks to influence the occupancy of student housing by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
H9(P) Older persons housing	This policy seeks to influence the provision of specialist housing for older persons by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
H10(P) Affordable housing	This policy seeks to influence the provision of affordable housing for older persons by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
H1a(A)	This policy makes provision for the development within York (H1a) which is situated far from the nearest European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vi). No other impacts are anticipated.	G – Screened out
H2b(A)	This policy makes provision for the development within York (H2b) which is situated far from the nearest European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vi). No other impacts are anticipated.	G – Screened out
H3(A)	This policy makes provision for the development (H3) which is situated far from the nearest European site. At such distances localised effects associated with the proximity of	G – Screened out

Policy	Rationale	Screening outcome
	development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vi). No other impacts are anticipated.	
H5(A)	This policy makes provision for the development (H5) which is situated far from the nearest European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vi). No other impacts are anticipated.	G – Screened out
H6(A)	This policy makes provision for the development (H6) which is situated far from the nearest European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vi). No other impacts are anticipated.	G – Screened out
H7(A)	This policy makes provision for the development (H7) which is situated far from the nearest European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vi). No other impacts are anticipated.	G – Screened out
H8(A)	This policy makes provision for the development (H8) which is situated far from the nearest European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vi). No other impacts are anticipated.	G – Screened out
H10(A)	This policy makes provision for the development (H10) which is situated far from the nearest European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vi). No other impacts are anticipated.	G – Screened out
H20(A)	This policy makes provision for the development (H20) which is situated far from the nearest European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vi). No other impacts are anticipated.	G – Screened out
H22(A)	This policy makes provision for the development (H22) which is situated far from the nearest European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues,	G – Screened out

Policy	Rationale	Screening outcome
	such as the disposal of wastewater are effectively screened out by policy GI2 (vi). No other impacts are anticipated.	
H23(A)	This policy makes provision for the development (H23) which is situated far from the nearest European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vi). No other impacts are anticipated.	G – Screened out
H29(A)	This policy makes provision for the development (H29) which is situated far from the nearest European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vi). No other impacts are anticipated.	G – Screened out
H31(A)	This policy makes provision for the development (H29) which is situated far from the nearest European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vi). No other impacts are anticipated.	G – Screened out
H38(A)	This policy makes provision for the development (H29) which is situated far from the nearest European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vi). No other impacts are anticipated.	G – Screened out
H39(A)	This policy makes provision for the development in Elvington (H39) which is situated just a few hundred meters from the River Derwent and Lower Derwent Valley European sites, albeit over 5km from the most convenient access point at Wheldrake. Given the lack of access locally, the proximity of the allocation is considered to be largely irrelevant. Even where access can be gained, the European site is largely confined to the channel and regarded as resilient to public pressure. In terms of the more distant access at Wheldrake, at such distances, localised effects associated with the proximity of development are possible but unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vi).	G – Screened out
H46(A)	This policy makes provision for the development (H46) which is situated just over 5km by road from the most convenient access point to Strensall Common. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues,	G – Screened out

Policy	Rationale	Screening outcome
	such as the disposal of wastewater are effectively screened out by policy GI2 (vi). No other impacts are anticipated.	
H52(A)	This policy makes provision for the development (H52) which is situated far from the nearest European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vi). No other impacts are anticipated.	G – Screened out
H53(A)	This policy makes provision for the development (H53) which is situated far from the nearest European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vi). No other impacts are anticipated.	G – Screened out
H55(A)	This policy makes provision for the development (H55) which is situated far from the nearest European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vi). No other impacts are anticipated.	G – Screened out
H56(A)	This policy makes provision for the development (H56) which is situated far from the nearest European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vi). No other impacts are anticipated.	G – Screened out
H58(A)	This policy makes provision for the development (H29) which is situated far from the nearest European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vi). No other impacts are anticipated.	G – Screened out
H59(A)	This policy makes provision for the development in Strensall Camp (H59) which is situated adjacent to Strensall Common European site. At such distance, especially as no meaningful avoidance or mitigation measures are put forward in the policy or explanatory text, LSE alone from recreational pressure cannot be ruled out. In addition, possible change to the local hydrological regime from construction means that LSE alone on the wet heath communities cannot be ruled out.	I – Screened in LSE alone

Policy	Rationale	Screening outcome
	Furthermore, increased road traffic associated with the new residents may increase nitrogen deposition within the SAC ensuring that LSE alone cannot be ruled out. In contrast, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vi).	
SH1 Student housing	This policy makes provision for the development of student housing at Heweth Croft (SH1) which is situated far from the nearest European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vi). No other impacts are anticipated.	G – Screened out
HW1 Community facilities	This policy seeks to secure the retention of existing community facilities by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
HW2 New community facilities	This policy seeks to influence the provision of new community facilities by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
HW3 Built sport facilities	This policy seeks to influence the availability of sports facilities by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
HW4 Childcare provision	This policy seeks to influence the availability of childcare provision by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
HW5 Healthcare services	This policy seeks to influence the availability of healthcare services by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
HW6 ambulances	This policy seeks to influence the provision of a handful of modest buildings in existing allocations for parked ambulances. Although it does promote development, it is inconceivable that this would result in harmful impacts on European sites.	G – Screened out
HW7 Healthy places	This policy seeks to influence the adoption of healthy places by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
ED1 York University	This policy represents a vision or aspirations for the University. It does not directly lead to development and so can have no effects on European sites.	A – Screened out
ED2 Campus West	This policy makes provision for the expansion of Campus West which is situated far from the nearest European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues,	G – Screened out

Policy	Rationale	Screening outcome
	such as the disposal of wastewater are effectively screened out by policy GI2 (vi). No other impacts are anticipated.	
ED3 Campus East	This policy makes provision for the expansion of Campus East which is situated far from the nearest European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vi). No other impacts are anticipated.	G – Screened out
ED4 Lord Mayor's Walk Campus	This policy makes provision for the expansion of York St John University Lord Mayor's Walk Campus which is situated far from the nearest European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vi). No other impacts are anticipated.	G – Screened out
ED5 York St John University Expansion	This policy makes provision for the further expansion of York St John University which is situated far from the nearest European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vi). No other impacts are anticipated.	G – Screened out
ED6 School provision	This policy seeks to influence the provision of pre-, primary and secondary schools by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
ED7 Colleges	This policy makes provision for the further expansion of York College and Askham Bryan Colleges which are situated far from the nearest European site. At such distances localised effects associated with the proximity of development are unlikely. Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vi). No other impacts are anticipated.	G – Screened out
ED8 Access to facilities on education sites	This policy seeks to influence the provision for community access to sport and cultural facilities on educational sites by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
D1 Placemaking	This policy seeks to improve poor urban and natural environments by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
D2 Setting	This policy seeks to promote appreciation of the wider landscape character in design by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out

Policy	Rationale	Screening outcome
D3 Cultural provision	This policy seeks to promote York's cultural character by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
D4 Conservation areas	This policy seeks to promote development that enhances the special character of the area by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
D5 Listed buildings	This policy seeks to promote development that preserves the significance and heritage values of buildings by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
D6 Archaeology	This policy seeks to influence development that affects archaeological features by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
D7 Heritage Assets	This policy seeks to influence development that affects non-designated heritage assets by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
D8 Historic Parks and Gardens	This policy seeks to influence development that affects historic parks and gardens by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
D9 Historic Record	This policy seeks to ensure that the historic record remains accurate and available by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
D10 City walls	This policy seeks to conserve and enhance the value of the City Walls by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
D11 Alterations to Listed buildings	This policy seeks to promote high quality design for proposals affecting listed buildings by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
D12 Shopfronts	This policy seeks to influence the design of shopfronts by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
D13 Advertisements	This policy seeks to influence the display of advertisements by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
D14 Shutters	This policy seeks to influence the use of security shutters by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out

Policy	Rationale	Screening outcome
GI1 Green infrastructure	This policy seeks to conserve and enhance the natural environment. The policy will have the effect of safeguarding biodiversity and will not result in any adverse effects on European sites.	D – Screened out
GI2 Biodiversity	This policy also seeks to conserve and enhance York's biodiversity resource. It will not result in any adverse effects.	D – Screened out
GI3 Green infrastructure network	This policy also seeks to conserve and enhance York's green infrastructure. It will not result in any adverse effects on European sites.	D – Screened out
GI4 Trees and hedgerows	This policy also seeks to conserve and enhance York's trees and hedgerows. It will not result in any adverse effects on European sites.	D – Screened out
GI5 Open space	This policy seeks to influence the use open spaces and play areas by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
GI6 New open spaces	This policy seeks to influence the provision of new open spaces for recreation and amenity by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
GI7 Burial grounds	This policy seeks to influence the provision of new open spaces for recreation and amenity by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
GB1 Development in the Green belt	This policy seeks to influence new development in the Green Belt by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
GB2 Washed over Green Belt	This policy seeks to influence new development in settlements 'washed-over' by the Green Belt by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
GB3 Re-use of buildings in Green Belt	This policy seeks to influence the reuse of existing buildings within the Green Belt by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
GB4 Exception sites in the Green Belt	This policy encourages development in unknown locations. The scale and nature of this type of development make it highly unlikely that direct impacts on European sites would result and strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vi). No other impacts are anticipated.	G - Screened out
CC1 Renewable generation and storage	This policy seeks to influence the reduction in carbon emissions from new development alongside renewable power generation by identifying criteria to evaluate	B – Screened out

Policy	Rationale	Screening outcome
	proposals. It does not directly lead to development and so can have no effects on European sites.	
CC2 Sustainable design	This policy seeks to promote a reduction in carbon emissions and the adoption of climate change adaptation techniques in new development by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
CC3 Combined Heat and Power	This policy seeks to promote more sustainable heating and power sources in new development by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
ENV1 Air Quality	This policy seeks to safeguard human health but will also protect biodiversity and will not result in any adverse effects on European sites.	D – Screened out
ENV2 Environmental Quality	This policy seeks to influence a wide range of environmental pollutants but will also protect biodiversity and will not result in any adverse effects on European sites.	D – Screened out
ENV 3 contaminated land	This policy seeks to reduce the environmental effects of contaminated land by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
ENV4 Flood Risk	This policy seeks to reduce the level of risk associated with floods by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
ENV5 Sustainable drainage	This policy seeks to reduce excessive surface water drainage from new developments by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
WM1 Waste	This policy refers to measures contained within and to be delivered by the Minerals and Waste joint Plan established by the Council along with North Yorkshire County Council.	C – Screened out
WM2 Minerals	This policy refers to measures contained within and to be delivered by the Minerals and Waste joint Plan established by the Council along with North Yorkshire County Council.	C – Screened out
T1 Sustainable Access	This policy seeks to promote sustainable travel by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
T2 Public Transport	This policy refers to measures contained within and to be delivered by the Local Transport Plan but also promotes local infrastructure improvements. None threaten European sites.	G – Screened out
T3 York station	This policy promotes development in and around York Station but it is inconceivable that this would result in any adverse impacts on European sites.	G – Screened out
T4 Strategic Highways	This policy promotes local infrastructure improvements including the A1237 which bisects Strensall Common.	G – Screened out

Policy	Rationale	Screening outcome
	However, it is inconceivable that this would result in any adverse impacts on European sites.	
T5 Strategic cycle and pedestrian networks	This policy promotes improvements to the cycling and pedestrian network. However, it is inconceivable that this would result in any adverse impacts on European sites.	G – Screened out
T6 Transport corridors and interchanges	This policy encourages development in unknown locations. The scale and nature of this type of development make it highly unlikely that direct impacts on European sites would result and strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vi). No other impacts are anticipated.	G – Screened out
T7 Demand management	This policy seeks to reduce traffic and promote sustainable travel by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
T8 Minimising travel	This policy seeks to reduce traffic and promote sustainable travel by identifying criteria to evaluate proposals. It does not directly lead to development and so can have no effects on European sites.	B – Screened out
T9 Alternative fuels and freight centres	This policy encourages development in unknown locations. The scale and nature of this type of development make it highly unlikely that direct impacts on European sites would result and strategic issues, such as the disposal of wastewater are effectively screened out by policy GI2 (vi).. No other impacts are anticipated.	G – Screened out
T10 Safeguarded land	This policy seeks to safeguard land for future traffic infrastructure. It does not directly lead to development and so can have no effects on European sites.	G – Screened out
C1 – Communications infrastructure	This policy encourages communications infrastructure but it is inconceivable this will adversely affect European sites.	G – Screened out

UK and Ireland Office Locations