

## **Habitats Regulations Assessment (HRA) Position Statement September 2018 – ABC/PS/22**

As a result of the Inspectors' post-hearings Advice Note (ID/10), the Council has made a number of modifications to the Local Plan to achieve Soundness. Any amendment to the main development plan has the potential to result in a change to its environmental impacts on European protected sites and therefore could trigger a review of the associated Appropriate Assessment. This statement, therefore, is to address any impact of these changes on the Habitat Regulations Assessment (incorporating Appropriate Assessment Screening Report) SD/11.

In this case, the Council considers that the suite of changes made to the Plan through the Main Modifications does not result in the need to review the HRA or its conclusion that an Appropriate Assessment is not required. Furthermore, it is considered that the Plan as a whole, and several key policies in particular, have been enhanced to provide additional safeguards for European protected sites.

Potential effects from new development proposed in the Plan on protected sites were identified in section 3.3 of the HRA (SD11), and those Policies specifically providing additional mitigation were identified therein. No significant adverse effects were identified.

The screening assessment at section 4 of SD11 concludes that the policies, including site policies, in the Plan would be unlikely to result in a significant adverse effect upon European sites. Although changes have been made to a number of these policies, these changes do not impact upon the screening conclusions set out in Tables 1 and 2, which remain the same.

The most significant changes which could be considered to impact upon the conclusions of the HRA and AA screening assessment, are those proposed to increase the housing requirement, and changes to site policies. However, it is not considered that any of the changes would alter the conclusions of the assessment.

No additional site allocations have been proposed, and furthermore a number of sites are proposed to be deleted from the Plan (S34, S47, S48, S49, S58, S61, and S53), with a reduction in capacity of others (S51, S52, S59).

Specifically there have been no changes to criteria within policies which relate to requirements for an Environmental Assessment in relation to European sites, or to those which restrict development which would have a significant adverse impact upon European sites.

Additionally, policies which were identified in section 3.3 as providing additional mitigation, have in some cases been enhanced in relation to the environmental requirements.