Allerdale Borough Council

Habitats Regulations Assessment

Local Plan Site Allocations

FINAL – 27th September 2018

With Updates - July 2019

Final Amendments – September 2019

Lakeland Business Park, Lamplugh Road, Cockermouth, Cumbria, CA13 0QT Tel 01900 898600

Email: ecology@wyg.com
Allerdale Borough Council – Habitats Regulations Assessment of Local Plan Site
Allocations September 2019

Document Control

Project: Allerdale Borough Council – Site Allocations HRA
Client: Allerdale Borough Council
Job Number: A093361-4
File Origin: N:\Projects\Projects A093000 on\A093361-3 Allerdale BC Local Plan Site
Allocations HRA\ALLERDALE SITE ALLOCATIONS HRA 2018

<table>
<thead>
<tr>
<th>Issue</th>
<th>Date</th>
<th>Prepared by</th>
<th>Reviewed by</th>
<th>Verified By</th>
<th>Description of changes</th>
</tr>
</thead>
<tbody>
<tr>
<td>3</td>
<td>July 2019</td>
<td>Penny Ward MCIEEM</td>
<td>Phil Preston</td>
<td>Gavin Ward CEnv, MICEEM, PIEMA</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Principal Ecologist</td>
<td>Principal Ecologist</td>
<td>Associate Director</td>
<td></td>
</tr>
</tbody>
</table>

WYG Environment Planning Transport Ltd. accept no responsibility or liability for the use which is made of this document other than by the Client for the purpose for which it was originally commissioned and prepared.

<table>
<thead>
<tr>
<th>Version</th>
<th>Date</th>
<th>Updated by</th>
<th>Verified by</th>
<th>Description of changes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Issue 3</td>
<td>22nd July 2019</td>
<td>PW</td>
<td>TC</td>
<td>Updated to reflect changes in policy, legislation, guidance and case law</td>
</tr>
<tr>
<td>Issue 4</td>
<td>13th Sept. 2019</td>
<td>PW</td>
<td>GW</td>
<td>Updated to re-assess changes in Policy where required</td>
</tr>
</tbody>
</table>
Contents

1.0 Introduction .................................................................................................................. 1
1.1 Allerdale Borough Council Local Plan ...................................................................... 1
1.2 HRA Process ............................................................................................................... 2
1.3 Links to Strategic Environmental Assessment and Sustainability Appraisal ........... 7
1.4 Information used in this Assessment ........................................................................ 7
1.5 Professional judgement ............................................................................................... 8

2.0 Methodology for HRA Screening and Appropriate Assessment .............................. 10
2.1 Stage 1 - Screening .................................................................................................... 10
2.2 Stage 2: Appropriate Assessment ............................................................................. 12
2.3 Stage 3 Alternatives and IROP ................................................................................. 12
2.4 Consultation .............................................................................................................. 13

3.0 Evidence Gathering - Natura 2000 Sites .................................................................. 13
3.1 Zone of Influence and Scope ..................................................................................... 13
3.2 Sites within, or partly within, Allerdale Borough Council ....................................... 15
3.3 Sites beyond ABC boundary ...................................................................................... 16
3.4 Qualifying Features of Natura 2000 sites ................................................................ 16
3.5 Qualifying Features of Natura 2000 sites and Potential Impacts .............................. 26

4.0 Stage 1 Screening - Site Allocations ............................................................................ 39
4.1 Screening of Site Allocations ..................................................................................... 39
4.2 Screening Matrix for Site Allocations ........................................................................ 42
4.3 Summary of Stage 1 Screening of Site Allocations .................................................... 60

5.0 Stage 1 Screening - Policies ....................................................................................... 61
5.1 Screening of Policies .................................................................................................. 61
5.2 Screening Matrix for Policies .................................................................................... 62

6.0 In-combination Assessment - Other Relevant Plans and Projects ............................ 64

7.0 Appropriate Assessment ............................................................................................. 72
7.1 Appropriate Assessment of Site Allocations .............................................................. 72
7.2 Appropriate Assessment of Policies .......................................................................... 83

8.0 Conclusions ................................................................................................................ 89

9.0 References ................................................................................................................... 90

www.wyg.com

creative minds safe hands
2.1 Zone of Influence and Scope................................................................................. 12
2.2 Sites within, or partly within, Allerdale Borough Council........................................ 14
2.3 Sites beyond ABC boundary .................................................................................. 15
2.4 Qualifying Features of Natura 2000 sites .................................................................... 15
2.5 Qualifying Features of Natura 2000 sites and Potential Impacts ................................. 22
4.0 Stage 1 Screening – Site Allocations .................................................................... 41
4.1 Screening of Site Allocations .................................................................................. 41
4.2 Screening Matrix for Site Allocations........................................................................ 44
4.3 Summary of Stage 1 Screening of Site Allocations ..................................................... 62
5.0 Stage 1 Screening – Policies .................................................................................. 69
5.1 Screening of Policies ................................................................................................ 69
5.2 Screening Matrix for Policies .................................................................................. 64
6.0 In-combination Assessment - Other Relevant Plans and Projects .............................. 66
7.0 Appropriate Assessment ......................................................................................... 74
7.1 Appropriate Assessment of Site Allocations ............................................................... 74
7.2 Appropriate Assessment of Policies ......................................................................... 86
8.0 Conclusions ........................................................................................................... 91
9.0 References ............................................................................................................ 92
1.0 Introduction

1.1 Allerdale Borough Council Local Plan

In December 2012 WYG was commissioned to undertake the Habitats Regulations Assessment (HRA) of the Allerdale Local Plan, on behalf of Allerdale Borough Council (ABC), which had been developed in response to the new NPPF and now replaces the Allerdale Local Plan (1999). The Allerdale Borough Council Local Plan and associated DPD were formerly adopted in 2013.

The Allerdale Borough boundary extends into the Lake District National Park (LDNP) but land within the LDNP falls outside the remit of the Allerdale Local Plan as it is covered by the LDNP’s own policies.

WYG was commissioned in August 2015 by ABC to undertake an HRA of the proposed Site Allocations for residential, employment, mixed use and retail development sites throughout the Borough, but outside the jurisdiction of the Lake District National Park. The aim of this HRA is to establish whether or not there is likely to be any adverse effect on Natura 2000 sites as a result of the site allocations put forward. This document considers in more depth the potential for any likely significant effects on Natura 2000 sites as a result of development at specific site allocations proposed for inclusion in the Local Plan, and where necessary an Appropriate Assessment to determine whether identified potential significant effects would have an adverse effect on Natura 2000 site integrity. Natura 2000 sites screened out of the original Local Plan Part I HRA (WYG, 2013) are not considered likely to be impacted by these site allocations as it had already been shown that these sites will be outside the Zone of Influence of the ABC Local Plan.

The Site Allocations document (Allerdale Local Plan (Part 2) Site Allocations – Pre-Submission Consultation Sept 2018) includes Policies relating to spatial developments within the Borough and these policies have also been assessed within this HRA document.

The Site Allocations HRA assesses Part 2 of the ABC Local Plan; several of the potential likely significant effects were screened out in the Local Plan Part I HRA (WYG, 2013); this Part 2 assessment needs to be read in conjunction with the Part 1 assessment for the Local Plan itself which underpins assessment at the Site Allocations level.

This Amended Site Allocation HRA (Issue 3) has been provided in July 2019 in order to provide further clarification in relation to recent changes in guidance, policy, legislation and case law. All changes or additions to the original Sept 2018 document have been shown as track changes.
**Allerdale Borough Council – Habitats Regulations Assessment of Local Plan Site Allocations September 2019**

**Version Issue** 4 of the HRA contains minor changes to the assessment as a result of Policy amendments. This is the FINAL HRA for the Allerdale Site Allocations, Part 2 of the Local Plan.

### 1.2 HRA Process

#### 1.2.1 Requirement for HRA

EU Directive 92/43/EC on the Conservation of Natural Habitats and Wild Fauna and Flora, known more commonly as the Habitats Directive, provides legal protection for habitats and species of European importance. Articles 3 to 9 provide the legislative means to protect habitats and species of community interest through the establishment and conservation of an EU wide network of sites known as Natura 2000 sites. Natura 2000 sites include Special Areas of Conservation (SACs), designated under the Habitats Directive, and Special Protection Areas (SPAs), designated under the Conservation of Wild Birds Directive (79/409/EEC).

Articles 6(3) and 6(4) of the Habitats Directive establish a requirement for competent authorities to undertake HRA of any plan or project likely to have a significant effect upon Natura 2000 sites. In light of the conclusions of the assessment, the competent authority shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned.

The Habitats Directive is implemented in the UK via the Conservation of Habitats and Species Regulations 2017 (as amended). The Habitats Regulations include a requirement for Appropriate Assessments to be made for land use plans when such plans are likely to have a significant effect on a Natura 2000 site and are not directly connected with or necessary to the conservation management of the site.

A revised NPPF was issued on 19th February 2019 (Ministry of Housing Communities and Local Government, 2019) and currently supplements government Circular 06/2005, Biodiversity and Geological Conservation: Statutory Obligations and their Impact within the Planning System (Office of the Deputy Prime Minister, 2005). This clearly states that the following wildlife sites should be given the same protection as Natura 2000 sites: potential Special Protection Areas and possible Special Areas of Conservation; listed or proposed Ramsar sites; and sites identified, or required, as compensatory measures for adverse effects on Natura 2000 sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites. In addition, regard to the location of proposed Marine Conservation Zones should be taken into account whilst addressing potential effects of the plans.
The purpose of this assessment report is to identify any likely significant effects upon Natura 2000 sites as a result of the site allocations and related policies proposed under the Local Plan.

1.2.2 HRA at the Plan Level

Habitats Regulations Assessment is an assessment of the potential effects of a proposed plan on one or more Natura 2000 sites. The entire process of investigating the potential effects of a plan or project on Natura 2000 sites is known as HRA, to distinguish it from the term Appropriate Assessment (AA) as referred to in the Conservation of Habitats and Species Regulations 2017 (as amended), which actually refers to a statement from the competent authority (in this case ABC) which identifies whether the plan does, or does not affect the integrity of Natura 2000 site(s). This assessment is termed ‘Appropriate Assessment’ because the assessment should be appropriate to its purpose under the Habitats Directive prescribed in Articles 6(3) and (4) i.e. to assess the implications of the plan in respect of the site’s ‘conservation objectives’.

Article 6(3) states that ‘any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications in view of the site’s conservation objectives. In the light of the conclusions of the assessment of the implications for the site, and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, having obtained the opinion of the general public.’

The purpose of HRA of plans is to ensure that the protection of Natura 2000 sites is part of the planning process at both a regional and local level. Assessment of potential in-combination effects with other plans or projects is an important part of the process. Plans and development may still be permitted if there is no reasonable alternative or there are ‘imperative reasons of overriding public interest’ (IROPI) as to why they should proceed. Article 6(4) of the Directive deals with alternative solutions and the test of ‘imperative reasons of overriding public interest’ (IROPI) and compensatory measures, stating that ‘If, in spite of a negative assessment of the implications for the site and in the absence of alternative solutions, a plan or project must nevertheless be carried out for imperative reasons of overriding public interest, including those of social or economic nature, the Member States shall take all compensatory measures to ensure that the overall coherence of the Natura 2000 site is protected.’

HRA should be carried out on all plans (and projects) which are not directly connected to conservation management of the Natura 2000 site or necessary to the site management, and
therefore might have implications for the integrity of the site in view of the site's conservation status, either alone or in combination with other plans or projects. The aim of HRA is "to maintain or restore, at favourable conservation status, natural habitats and species of wild fauna and flora of community interest".

The Habitats Directive promotes a hierarchy of avoidance, mitigation and compensatory measures. Initially the plan should aim to avoid any negative impacts on Natura 2000 sites by identifying possible impacts early in the plan-making process and writing the plan in order to avoid such impacts. Secondly, if taken forward to Appropriate Assessment, mitigation measures should be applied during the process to the point where no adverse impacts on the site(s) remain. If the plan is still likely to result in adverse effects and no further practicable mitigation is possible then it should not be taken forward. Under such a scenario the plan may have to undergo an assessment of alternative solutions.

Compensatory measures are required for any remaining adverse effects but they are permitted only if (a) there are no alternative solutions; and (b) the plan is required for Imperative Reasons of Overriding Public Interest (IROPI). Acceptable reasons of overriding public interest differ depending on the qualifying feature(s) affected within the Natura 2000 site (the importance of each site is defined through a number of qualifying features, which together make up the integrity of the site).

Some habitats and species are defined as being 'priority' because they are particularly vulnerable and are mainly, or exclusively, found within the European Union. Where the qualifying feature affected is a European priority habitat or species (indicated in the Directive by an asterisk), the only permissible reasons for allowing the plan or project to proceed are those relating to human health or public safety or beneficial consequences of primary importance for the environment. Where the qualifying feature affected is not a European priority habitat or species, reasons of a social or economic nature may be acceptable.

1.2.3 HRA Guidance

The HRA process undertaken by WYG has been developed in accordance with the following guidance:

- The Conservation of Habitats and Species Regulations 2017 (as amended);
- EU Directive 92/43/EC on the Conservation of Natural Habitats and Wild Fauna and Flora;
- DTA HRA Handbook (Tyldesley and Chapman, 2013);

EC (2001) Assessment of plans and projects significantly affecting Natura 2000 sites: methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC


1.2.4 HRA Stages

The guidance provided under Department for Communities and Local Government (DCLG, 2006) identifies assessment required under the following stages:

- **Stage 1 - Screening likely significant effects:** this stage identifies potential effects of a plan or project on the qualifying features of the Natura 2000 sites and assesses whether or not these effects will be significant either alone or in combination with other plans or projects. The precautionary principle has been used in assessing whether effects may be significant so where there is any uncertainty, the potential effect has been examined in greater detail in the next stage. Following the European Court of Justice decision in April 2018 for a site in Ireland (*People Over Wind and Sweetman v Coillte Teoranta*) it appears no longer possible to provide avoidance and mitigation at the screening stage for any significant effects resulting in no significant adverse effects. This judgment stated that "a full and precise analysis of the measures capable of avoiding or reducing any significant effects on the site concerned must be carried out not at the screening stage, but specifically at the stage of the appropriate assessment".

Since the Issue 2 of this HRA in September 2018, the case law relating to the Holohan HRA judgment (*Holohan & Ors. v An Bord Pleanála* 7 November 2018, C - 461/17) has been adopted. This judgement provides further clarification about the scope of an AA, requiring that it must:

- catalogue the entirety of habitat types and species for which a site is protected;
- identify and examine the implications of the project for species present on the SPAs / SACs for which the site has not been listed...provided that those implications are liable to affect the Conservation Objectives of the site (ie if they are necessary to the conservation of the habitat types and species listed for the protected area); and
- consider the implications for habitat types and species to be found outside the SPA / SAC provided that those implications are liable to affect the Conservation Objectives of the SPA / SAC (ie if they are necessary to the conservation of the habitat types and species listed for the protected area).

WYG have always included within their HRAs assessments of other features which might affect the Conservation Objectives of any Natura 200 site, including for example supporting habitats of SPA birds outside the designated site boundary. Any other non-qualifying ecological features that may support the integrity of Natura 2000 sites are also assessed as part of the HRA process.
- **Stage 2 - Detailed Appropriate Assessment and ascertaining the effect on site integrity:** where there are likely significant effects without avoidance/mitigation, or some uncertainty remains, more detailed information will need to be considered to determine the impact of these effects on the Natura 2000 qualifying features and hence site integrity. This entails considering the adverse effects, both alone and in-combination with other plans and projects, on the ‘integrity’ of the Natura 2000 site in respect of the site’s structure and function, and its conservation objectives. Potential for avoidance and mitigation should be considered at Appropriate Assessment stage to avoid adverse effects on site integrity.

- **Stage 3 - Alternative solutions:** where a plan/policy option has been found to have an adverse effect on the integrity of a Natura 2000 site, these should be mitigated where possible to overcome any adverse/negative effects as stated above. Alternative solutions of achieving the plan objectives should be identified and, where this is not possible, the policy option should not proceed unless there are IROPI involved.

- **Stage 4 - IROPI:** should the plan be found likely to result in adverse effects on the integrity of a Natura 2000 site, it can only be considered if there are IROPI. At this stage adequate compensation would need to be proposed to off-set any potential adverse effects on site integrity.

Habitats Regulations Assessment should be an iterative process with counter-acting measures identified throughout the process. The site allocation screened into the AA process as having potential to impact on a Natura 2000 site will be revisited as part of this process and amendments may be possible which would avoid necessity to undertake more detailed AA. However, if these recommendations and amendments are still unable to exclude risk of a significant effect then full AA will be required. Following full AA and adoption of suitable mitigation, if there is still potential to adversely affect site integrity, alternatives should be sought or the policy withdrawn unless there are IROPI.

In seeking to demonstrate IROPI, guidance is provided by The European Commission’s ‘Managing Natura’ (2000) and through the European Commission’s opinion on a number of projects including the expansion of Karlsruhe-Baden airport in 2005, Dibden Bay in 2004 and Bathside Bay in 2005 to name a few. The guiding principles raised include:

- That the project is of national or at least regional significance;
The project would make a vital contribution to strategic economic development or regeneration; and

Failure to proceed with the project would have unacceptable social and/or economic consequences.

1.3 Links to Strategic Environmental Assessment and Sustainability Appraisal

Sustainability Appraisal (SA) is a process through which the sustainability of a plan under preparation is assessed. The Planning and Compulsory Purchase Act 2004 requires Local Planning Authorities to carry out SA of their Development Plan Documents and Supplementary Planning Documents.

Under the Environmental Assessment of Plans and Programmes Regulations 2004, it is also a requirement that all plans and programmes (setting a framework for future development consent and likely to have significant environmental effects) are subject to environmental assessment. It is a requirement that Local Authorities carry out a Strategic Environmental Assessment (SEA) of their Local Development Framework documents under these Regulations.

The approach to SA for Local Development Frameworks/ Local Plans set out by the Department for Communities and Local Government (DCLG 2006) advocates a joint approach to SA and SEA.

However, these are distinct processes with different aims:

- The purpose of SA is to identify the key social, economic and environmental effects of the overall growth and spatial options and enable the promotion of sustainability considerations throughout the plan making process.
- HRA has a narrower focus, the aim being to ensure that the overall growth and spatial options do not result in activities which could damage the integrity of Natura 2000 sites.

1.4 Information used in this Assessment

The following sources of information have been consulted during the preparation of this report:

- JNCC details of Natura 2000 sites including citations;
- Conservation objectives and favourable condition tables provided by Natural England;
Information on current importance of different factors in maintaining favourable condition, provided by Natural England;

- Information provided by Environment Agency with regards water quality objectives;
- Revised Local Plan Stage 2 Site Allocations from ABC;
- List of current projects / developments from ABC;
- Distribution maps of SPA birds from CBRC Tullie House;
- www.jncc.defra.org.uk;
- www.magic.gov.uk.

1.5 Professional judgement

Professional judgement has been used throughout this study and is particularly relevant to decisions made in relation to potential impacts. The approach has been to identify risks on the basis of the precautionary principle as far as practicable.

The reliability of professional judgment can be quantified to some extent by reference to the experience of the professional concerned. This report was authored by Penny Ward MCIEEM, WYG Principal Ecologist / Environmental Project Manager, assisted by Elizabeth Spedding MCIEEM with technical direction from Claire Wilmer MCIEEM CEnv, WYG Director of Ecology and Gavin Ward MCIEEM WYG Associate Director.

- **Penny Ward** - Principal Ecologist/Environmental Project Manager

  Penny has been a professional ecologist since 1977. She has been involved in assessments of a number of projects and plans with complex technical and legal issues and, as such, has a good understanding of the legislative framework, prevailing guidance and process of HRA.

- **Elizabeth Spedding (Issue 1)**

- **Claire Wilmer (Issue 1)**

- **Tamsin Clark (Issue 3)**
• **Phil Preston (Issue 4)**

• **Gavin Ward – Associate Director (Issue 2/3/4)**

Gavin has worked within the consultancy sector since 2002 and has a strong background in assessing ecological and environmental impacts. He has experience of working across a range of habitats, species and regulatory frameworks and is part of the quality review function within the team, helping to ensure our reports are both high quality and robust.
2.0 Methodology for HRA Screening and Appropriate Assessment

2.1 Stage 1 - Screening

Allerdale Borough Council Local Plan has previously been screened in consultation with Natural England, to identify whether the proposed policies, either alone or in combination with other plans or projects, are likely to have a significant effect on Natura 2000 sites. The HRA for the Local Plan was approved and the Plan adopted in 2013. This HRA for the Site Allocations and related policies involves a more detailed review of the site allocations proposed for development within the Borough.

Stage 1 screening tasks are addressed in the following chapters:

- Identification of Natura 2000 sites that may potentially be affected (within the potential ZoI of the site allocation in each case), qualifying features, condition and conservation objectives; we have also considered habitats and species, both within and without the designated sites that may have potential to affect the conservation objectives, even if these are not qualifying features of the site themselves – see Chapter 3;

- Determine whether or not the site allocation is directly connected with the conservation management of the site(s) – proposed biodiversity sites would be included under this;

- Screening of the individual site allocations – Chapter 4;

- Screening of Policies – Chapter 5;

- Identification of other plans and policies that may, in-combination with the site allocation(s), have an adverse impact on a Natura 2000 site – Chapter 6;

- Identification of the type and extent of potential effects on qualifying features of Natura 2000 sites;

Stage 2, Appropriate Assessment, is addressed in Chapter 7.0.

2.1.1 Evidence gathering

The evidence base for the initial stage aims to provide details of the qualifying features of the Natura 2000 sites together with conservation objectives.
In order to determine whether it is likely that the Site Allocations would have an adverse effect upon Natura 2000 sites, information was collected to establish the following:

- Characteristics of the Natura 2000 sites within the Local Plan’s ‘zone of influence’ (ZoI);
- Reasons why each site has been designated - the qualifying interest features;
- Environmental factors required to sustain the qualifying interest features and integrity of the sites;
- Conservation Objectives of the Natura 2000 sites; and
- Existing or predicted environmental conditions and trends which may be affecting the quality of the sites or have the potential to do so.

The following data and information were also sought:

- Latest Natural England Condition Surveys of the Natura 2000 sites;
- Recent surveys of the sites undertaken by or on behalf of the local authorities or other relevant bodies;
- Protected species and priority habitat data for the sites.

It was agreed that the Natura 2000 sites to be included in the evidence gathering stage for the HRA of the Local Plan would comprise:

- All Natura 2000 sites within ABC’s Borough boundary;
- Any Natura 2000 sites which lie outside the boundary of ABC but could potentially be impacted by plans and projects in ABC through pathways of effect/linkages such as watercourses and airborne pollution; and
- Natura 2000 sites where the qualifying species make use of functional habitat outside the site but within ABC for parts of the day/season/year (i.e. grazing habitat which supports wintering wildfowl located beyond the boundary of a SPA/Ramsar).

The above information has been updated in July 2019 to take account of any updates to guidance or site condition.

More detailed information relating to the Natura 2000 sites considered is included in Chapter 3 of this report.
2.1.2 Screening Exercise

Stage 1 HRA screening involves consideration of the Site Allocations in relation to any potential impacts on the natural environment either alone or in-combination with other plans/policies. This allows for a more detailed assessment of those sites which are strictly relevant to the HRA, namely those sites which could potentially result in a significant impact on any of the listed Natura 2000 sites.

Following this, a more detailed screening exercise will be carried out to determine whether any of the potential effects of the site allocations identified during the initial stage are likely to have a significant effect on any Natura 2000 site. This involves evaluation of individual screened in sites and their potential impact on the conservation objectives of the Natura 2000 sites. Summary baseline information has been provided in Chapter 3.0 which includes the Natura 2000 sites.

Site Allocations for which it is not possible to demonstrate with a reasonable level of certainty that they will have no effect on Natura 2000 site(s), and for those for which a possible impact may be identified, will require further assessment at Stage 2.

The scope for Stage 2 (if required) will be determined during Stage 1 Screening.

2.2 Stage 2: Appropriate Assessment

Stage 2 Appropriate Assessment requires more detailed analysis of any Site Allocations with the potential, without mitigation, to have a significant effect on qualifying features of Natura 2000 sites, to establish whether or not these effects are likely to result in an ‘adverse effect on the integrity’ of any Natura 2000 sites.

Potential impacts of any screened-in sites will be assessed in detail at this stage making use of expert knowledge, professional judgement and available guidance and legislation. If there are still outstanding concerns over adverse effects on the integrity of any Natura 2000 site as a result of certain Site Allocations within the Local Plan, alone or in-combination with other plans, then Stage 3 will follow.

2.3 Stage 3 Alternatives and IROPI

Where adverse effects on the integrity of any Natura 2000 site remain, even given mitigation, alternatives will need to be identified. If none are available, consideration can be given to IROPI and identifying appropriate compensatory measures.
2.4 Consultation

Consultation with Natural England regarding the HRA process and implications for Natura 2000 sites was carried out previously in connection with the HRA for the ABC Local Plan. They have been also contacted in respect of the Site Allocations HRA, have agreed the methodology adopted and provided useful comments on Version 1 of this report dated January 2017.

3.0 Evidence Gathering - Natura 2000 Sites

3.1 Zone of Influence and Scope

In order to provide a reasonable assessment of potential impacts, all European sites within a distance of 15 kilometres from any Site Allocation have been included, whether or not obvious pathways are present. Other sites further afield have been included where these have clear links with Allerdale and, therefore, have potential to be impacted by any development in the Borough. However, it should be noted that in certain circumstances there is a possibility that a development could cause an adverse impact over a wider area; where this is found to be the case it is considered that the development in question would not be an acceptable or feasible proposition, and significant impacts would be recognised at an early stage in any planning consultation.

Appendix A provides overview maps of the Natura 2000 sites included in this report, together with the locations of the site allocations proposed. It should be noted that, in certain circumstances, there is a possibility that a proposal could cause an adverse impact outside the predicted ZoI, for example where the development might give rise to air pollution. However, such a development would require detailed impact assessment to support a planning application, which would address potential for impacts on Natura 2000 sites.

HRA judgment (Holohan & Ors. v An Bord Pleanála, 7 November 2018, C - 461/17) has been considered within this assessment (July 2019). In summary this judgement provides further clarification about the scope of an AA, requiring that the assessment must:

- catalogue the entirety of habitat types and species for which a site is protected;

- identify and examine the implications of the project for species present on the SPAs / SACs / Ramsar sites for which the site has not been listed provided that those implications are liable to affect the Conservation Objectives of the site (i.e. if they are necessary to the conservation of the habitat types and species listed for the protected area); and
• consider the implications for habitat types and species to be found outside the SPA / SAC/Ramsar site provided that those implications are liable to affect the Conservation Objectives of the SPA / SAC (i.e. if they are necessary to the conservation of the habitat types and species listed for the protected area).

In essence, this is how a thorough HRA should be carried out, as there may be other features supporting the Conservation Objectives of the site which are not actually listed as qualifying features, both within the designated area and outside this. This approach has been taken by WYG in all its HRAs so despite the above Case being documented in November 2018 after the September 2018 HRA had been submitted to ABC, there is no additional information considered necessary to fulfil any requirements resulting from this Case Law. Further clarification will however be provided in the text following to demonstrate how other supporting species/habitats have been assessed throughout the HRA process.

In relation to a Plan HRA, WYGs approach has been extremely robust, incorporating site walkovers for every site investigated during the selection process. This has enabled the provision of ongoing advice to ABC on the ecological constraints for each site considered, and through this iterative process has led to unsuitable sites being dismissed and alternative sites adopted. The sites remaining in the Local Plan Part 2 have been considered in detail in respect of potential for likely significant effects on Natura 2000 sites, together with an appraisal of the site’s general biodiversity.

Information acquired during site inspections has been used to advise ABC on the potential ecological constraints on each selection site. Advice has then been incorporated in the Policies SA8 to SA48 for the 35 Site Allocations put forward in the Local Plan Part 2. This information provides upfront guidance to prospective developers and an indication of the ecological surveys required to support any application on the site. The additional detailed input to the HRA process can only further the elimination of risks to any Natura 2000 site, and it will contribute to the overall protection of biodiversity and green infrastructure across Allerdale. This will in turn provide resilience to other potential effects on ecology such as climate change; maintaining and building on the existing biodiversity and green infrastructure within Allerdale and surrounding local authorities, which will provide additional ecological support networks helping to safeguard qualifying features of European sites.

This information provides over and above the necessary baseline for undertaking assessment of a plan, as opposed to a project. As stated above, WYG always consider species and habitats in the wider area as well as non-qualifying habitats and species within the Natura 2000 sites which might affect the ecosystem functioning of the Natura 2000 site and hence contribute to its Conservation
Objectives. No further assessment is thus considered necessary following the publication of the Haaloohan case.

To provide some clarity on the type of additional supporting features which have been considered during the HRA process, examples of these features have been listed in Section 3.4 for each Natura 2000 site. The list is not meant to be exhaustive but for each Policy allocation site assessed, relevant examples of additional features and overall biodiversity are provided which have been considered where these could potentially affect the Conservation Objectives of each of the designated sites. It should be noted that local biodiversity in general provides a supporting role to Natura 2000 sites and their viability, so by incorporating habitat retention and enhancement together with reinforcement of wildlife corridors and green infrastructure within and adjacent to the allocated sites during implementation of each project will in itself provide benefits to the network of Natura 2000 sites.

The following section lists the Natura 2000 sites which have been considered in this assessment within the ZoI of the Local Plan Site Allocations, together with those which have already been screened out of the HRA during the Local Plan Part 1 assessment (there is no reason to suppose any of the site allocations could impact on those already screened out).

3.2 Sites within, or partly within, Allerdale Borough Council

Natura 2000 sites within or partly within Allerdale Borough include the following list which were assessed under the HRA for the Local Plan. Several of these sites were screened out of the HRA of the Local Plan as not likely to be subject to any significant effects as a result of the overall Local Plan and subsequent policies within this; these sites will therefore not be considered further in this assessment. The eight Natura sites shown in bold have been screened into this HRA.

- Upper Solway Flats and Marshes SPA, assessed as part of the Solway Firth pSPA
- Upper Solway Flats and Marshes Ramsar Site
- Solway Firth SAC
- South Solway Mosses SAC
- Lake District High Fells SAC
- Clints Quarry SAC
- River Eden SAC – screened out in ABC Local Plan HRA
- River Derwent and Bassenthwaite Lake SAC
- River Ehen SAC – screened out in ABC Local Plan HRA
- Borrowdale Woodland Complex SAC – screened out in ABC Local Plan HRA
- Naddle Forest SAC – screened out in ABC Local Plan HRA
• **Cumbria Marsh Fritillary site SAC.**
  - In addition, potential for likely significant effects on the newly designated Allonby Bay Marine Conservation Zone (MCZ) are included in this HRA, as requested by Natural England, although MCZs are not designated under the Habitats Regulations but under the Marine and Coastal Access Act 2009.

### 3.3 Sites beyond ABC boundary

The following Natura 2000 sites, which lie outside the Allerdale Borough, have been screened out of the HRA of the Local Plan as they are unlikely to be subject to any significant effects as a result of the overall Local Plan and subsequent policies within this; these sites will therefore not be considered further in this assessment. These are:

- North Pennine Dales Meadows SAC - screened out in ABC Local Plan HRA
- North Solway Mosses SAC (Dumfries and Galloway) – screened out in ABC Local Plan HRA
- Ullswater Woodlands SAC – screened out in ABC Local Plan HRA
- Wastwater SAC – screened out in ABC Local Plan HRA
- Drigg Coast SPA/SAC/Ramsar – screened out in ABC Local Plan HRA.

Figures 1 to 6 show the locations of all the Natura 2000 sites screened into the Site Allocations HRA and are provided in Appendix A.

### 3.4 Qualifying Features of Natura 2000 sites

This section summarises the qualifying features of each European site included in this HRA – further detailed information on each of these designated sites, including maps showing their boundaries, is provided in Chapter 6.0 and Appendix B. Each of the European designated sites has conservation objectives aimed at maintaining and/or improving the existing qualifying features for the sites. These conservation objectives are listed under each site detailed in Appendix B and are discussed in Chapter 6.0. More details and assessment for each of these sites during Part 1 of the Local Plan is provided in Chapter 6.0 of the Allerdale Local Plan HRA (WYG, updated January 2017.) This includes reasons for excluding some of the sites listed above from detailed assessment in this HRA.

#### 3.4.1 Upper Solway Flats and Marshes SPA, included within Solway Firth pSPA

This designation has been extended southwards along the Cumbrian coast to Whitehaven and renamed the Solway Firth pSPA. The Scottish extension of the site extends along to the Isle of Whithorn. In addition to the original qualifying features, the site has been extended to protect the
feeding grounds of certain marine birds – notably Common Scoter, Goosander and Red-throated Diver.

This site qualifies under Article 4.1 of the Directive (79/409/EEC) by supporting the following qualifying features:

- A038 Cygnus cygnus; Whooper swan (Non-breeding)
- A040 Anser brachyrhynchus; Pink-footed goose (Non-breeding)
- A045b Branta leucopsis; Barnacle goose (Non-breeding)
- A054 Anas acuta; Northern pintail (Non-breeding)
- A062 Aythya marila; Scaup (Non-breeding)
- A130 Haematopus ostralegus; Eurasian oystercatcher (Non-breeding)
- A140 Pluvialis apricaria; European golden plover (Non-breeding)
- A143 Calidris canutus; Red knot (Non-breeding)
- A157 Limosa lapponica; Bar-tailed godwit (Non-breeding)
- A160 Numenius arquata; Eurasian curlew (Non-breeding)
- A162 Tringa totanus; Common redshank (Non-breeding)
- Waterbird assemblage
  Additional Qualifying Features*
  - A001. Gavia stellata; Red-throated diver (Non-breeding)
  - A017. Phalacrocorax carbo; Great cormorant (Non-breeding)
  - A065. Melanitta nigra; Common scoter (Non-breeding)
  - A070. Mergus merganser; Goosander (Non-breeding)
  - A137. Charadrius hiaticula; Ringed plover (Non-breeding)
  - A142. Vanellus vanellus; Northern lapwing (Non-breeding)
  - A179. Larus ridibundus; Black-headed gull (non-breeding)
  - A182. Larus canus; Common gull (non-breeding)
  - A184. Larus argentatus; Herring gull (Non-breeding)

In addition to the qualifying features above which are specifically addressed in the Habitats Regulations assessment, the following ecological features have also formed part of the consideration of potential for a likely significant effect and adverse effect on site integrity where these additional features may affect the attainment of the Conservation Objectives for the site in question. This methodology has always been adopted in the ALSE and AA process, even prior to the Holohan Case.
Upper Solway Flats and Marshes SPA, included within Solway Firth pSPA – examples of additional supporting features considered:

- Functionally linked land which may be some distance from the Natura 2000 site itself – used as high tide roosts, for foraging and roosting.
- Feeding grounds of marine SPA birds, and potential for pollution to have adverse effect if connectivity to the allocation site;
- SPA bird prey and predators – fish and other marine organisms;
- Supporting marine habitats such as saltmarshes, mud and sandflats occurring outside the designated area.

3.4.2 Upper Solway Flats and Marshes Ramsar

- Ramsar criterion 2 - Supports over 10% of the British population of natterjack toad *Bufo calamita* (Habitats Directive Annex IV species (S1202))
- Ramsar criterion 6 – species/populations occurring at levels of international importance.

Qualifying Species/populations (as identified at designation):

*Species with peak counts in spring/autumn:*

- Eurasian oystercatcher, *Haematopus ostralegus*

*Species with peak counts in winter:*

- Whooper swan, *Cygnus cygnus*
- Pink-footed goose, *Anser brachyrhynchus*
- Barnacle goose, *Branta leucopsis*
- Northern pintail, *Anas acuta*
- Greater scaup, *Aythya marila*
- Red knot, *Calidris canutus*
- Bar-tailed godwit, *Limoso lapponica*
- Eurasian curlew, *Numenius arquata*
- Common redshank, *Tringa totanus*
Species/populations identified subsequent to designation for possible future consideration under criterion 6.

Species regularly supported during the breeding season:
- Lesser black-backed gull, *Larus fuscus graellsii*
- Herring gull, *Larus argentatus*

Species with peak counts in spring/autumn:
- Ringed plover, *Charadrius hiaticula*

Species with peak counts in winter:
- Dunlin, *Calidris alpine.*

In addition to the qualifying features above which are specifically addressed in the Habitats Regulations assessment, the following ecological features have also formed part of the consideration of potential for a likely significant effect and adverse effect on site integrity where these additional features may affect the attainment of the Conservation Objectives for the site in question. This methodology has always been adopted in the ALSE and AA process, even prior to the Holohan Case.

Upper Solway Flats and Marshes Ramsar – examples of additional supporting features considered:
- Functionally linked land which may be some distance from the Natura 2000 site itself – used as high tide roosts, for foraging and roosting.
- Feeding grounds of qualifying bird species, and potential for pollution to have adverse effect if connectivity to the allocation site;
- Qualifying bird species, prey and predators – freshwater and marine fish and other marine organisms;
- Supporting marine habitats such as saltmarshes, mud and sandflats, seagrass beds etc occurring outside the designated area;
- Potential terrestrial and aquatic natterjack toad habitats located outside the designated site;
- Networks of saline/freshwater ponds with potential connectivity to the known natterjack toad breeding pools
- Presence of natterjack toad prey, predators and competitors.
3.4.3 Solway Firth SAC

Solway Firth SAC is designated for the following qualifying features:

- H1110. Sandbanks which are slightly covered by sea water all the time
- H1130. Estuaries
- H1140. Mudflats and sandflats not covered by seawater at low tide
- H1170. Reefs
- H1220. Perennial vegetation of stony banks; Coastal shingle vegetation outside the reach of waves
- H1310. Salicornia and other annuals colonising mud and sand; Glasswort and other annuals colonising mud and sand
- H1330. Atlantic salt meadows (Glaucoc-Puccinellietalia maritimae); Atlantic salt meadows
- H2130. Fixed dunes with herbaceous vegetation ("grey dunes"); Dune grassland*
- S1095. Petromyzon marinus; Sea lamprey
- S1099. Lampetra fluviatilis; River lamprey

In addition to the qualifying features above which are specifically addressed in the Habitats Regulations assessment, the following ecological features have also formed part of the consideration of potential for a likely significant effect and adverse effect on site integrity where these additional features may affect the attainment of the Conservation Objectives for the site in question. This methodology has always been adopted in the ALSE and AA process, even prior to the Holohan Case.

Solway Firth SAC - examples of additional supporting features considered:

- Marine habitats such as saltmarshes, mud and sandflats, seagrass beds etc occurring outside the actual designated area, but providing additional supporting habitat for maintenance of viability of the ecosystem;
- Freshwater aquatic and estuarine habitats required during the life cycle of qualifying fish – sea and river lamprey;
- Marine organisms which form part of the foodchain of qualifying species;
- Plant grazers and competitors;
3.4.4 South Solway Mosses SAC

South Solway Mosses SAC has been designated for the following qualifying features:

- Active raised bogs
- Degraded raised bogs still capable of restoration.

In addition to the qualifying features above which are specifically addressed in the Habitats Regulations assessment, the following ecological features have also formed part of the consideration of potential for a likely significant effect and adverse effect on site integrity where these additional features may affect the attainment of the Conservation Objectives for the site in question. This methodology has always been adopted in the ALSE and AA process, even prior to the Holohan Case.

South Solway Mosses SAC - examples of additional supporting features considered:

- Areas of deep peat with potential hydrological connectivity to the designated site;
- Freshwater habitats including watercourses and ponds with potential connectivity to the designated site.

3.4.5 Lake District High Fells SAC

Lake District High Fells SAC has been designated for the following qualifying features:

- Oligotrophic to mesotrophic standing waters with vegetation of the Littorelletea uniflorae and/or of the Isoeto-Nanojuncetea
- Northern Atlantic wet heaths with Erica tetralix
- European dry heaths
- Alpine and Boreal heaths
- Sub-Arctic Salix spp. scrub
- Juniperus communis formations on heaths or calcareous grasslands
- Siliceous alpine and boreal grasslands
- Hydrophilous tall herb fringe communities of plains of the montane to alpine levels
- Blanket bogs (priority feature)
- Siliceous scree of the montane to snow levels (Androsacetalia alpinae and Galeopsietalia ladani)
- Siliceous rocky slopes with chasmophytic vegetation
- Old sessile oak woods with *Ilex* and *Blechnum* in the British Isles
- Species-rich *Nardus* grassland on siliceous substrates in mountain areas (and submontane areas in continental Europe) (priority feature)
- Alpine pioneer formations of the Caricion bicoloris-atrofuscae
- Alkaline fens
- Calcareous rocky slopes with chasmophytic vegetation
- Slender green feather-moss *Drepanocladus (Hamatocaulis) vernicosus*.

In addition to the qualifying features above which are specifically addressed in the Habitats Regulations assessment, the following ecological features have also formed part of the consideration of potential for a likely significant effect and adverse effect on site integrity where these additional features may affect the attainment of the Conservation Objectives for the site in question. This methodology has always been adopted in the ALSE and AA process, even prior to the Holohan Case.

Lake District High Fells SAC - examples of additional supporting features considered:

- Woodlands and heathlands supporting lower plant communities (bryophytes, lichen);
- Plant grazers;
- Other listed habitats represented outside the actual designated area;
- Peat and wetland habitats outside the actual designation;
- Freshwater connectivity between the site and other wetland habitats such as alkaline fens.

### 3.4.6 Clints Quarry SAC

Clints Quarry SAC has been designated due to the presence of a large population of great crested newts *Triturus cristatus*; this is the "qualifying feature" of the SAC.
In addition to the qualifying features above which are specifically addressed in the Habitats Regulations assessment, the following ecological features have also formed part of the consideration of potential for a likely significant effect and adverse effect on site integrity where these additional features may affect the attainment of the Conservation Objectives for the site in question. This methodology has always been adopted in the ALSE and AA process, even prior to the Holohan Case.

Clints Quarry SAC - examples of additional supporting features considered:

- Other freshwater ponds and wetland habitats within 1km of the designated site and any ponds which might be linked to the site via other waterbodies;
- Other suitable terrestrial habitat which might support GCN populations, but exists outside the actual designation;
- Location of other known GCN populations with potential connectivity via terrestrial habitats;
- Potential for network of green corridors supporting GCN and enabling dispersal outside the designated area;
- GCN competitors, predators and prey;
- Potential for adverse effects arising through the transfer of amphibian disease between freshwater waterbodies.

3.4.7 River Derwent and Bassenthwaite Lake SAC.

The qualifying features of River Derwent and Bassenthwaite Lake SAC are as follows:

- Oligotrophic to mesotrophic standing waters with vegetation of the Littorelletea uniflorae and/or of the Isoeto-Nanojuncetalia
- Watercourses of plain to montane levels with the Ranunculion fluitantis and Callitricho-Batrachion vegetation
- Tilio-Acerion forests of slopes, screes and ravines
- Old sessile oak wood with Ilex and Blechnum in the British Isles
- Bullhead (Cottus gobio)
- Freshwater Pearl Mussel (Margaritifera margaritifera)
- Marsh fritillary butterfly Eurodryas aurinia
- Sea lamprey Petromyzon marinus
- Brook lamprey Lampetra planeri
- River lamprey Lampetra fluviatilis
- Atlantic salmon Salmo salar
- Otter Lutra lutra
• Floating water-plantain *Luronium natans*
• Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior*
• Tilio-Acerion forest of slopes, scree and ravines
• Siliceous rocky slopes with *chasmophytic* vegetation
• Old sessile oak woods with *Ilex* and *Blechnum* in the British Isles
• European Dry Heaths

In addition to the qualifying features above which are specifically addressed in the Habitats Regulations assessment, the following ecological features have also formed part of the consideration of potential for a likely significant effect and adverse effect on site integrity where these additional features may affect the attainment of the Conservation Objectives for the site in question. This methodology has always been adopted in the ALSE and AA process, even prior to the Holohan Case.

**River Derwent and Bassenthwaite Lake SAC** - examples of additional supporting features considered:

- All freshwater and underground waters draining into the SAC;
- Undesignated head waters which might support breeding fish populations;
- Habitats and species found in lower reaches of the river where it enters the sea but is not designated;
- Marshy grasslands which might support marsh fritillary butterfly life cycle outside the actual designated site;
- Networks of freshwater channels and riparian habitats which have potential to support otter outside the designated area;
- Designated habitats listed here which are found outside the actual boundary of the designation but act as supporting habitat helping maintain overall long-term viability of such habitats;
- Presence of predators, prey, competitors and parasites;
- Potential for adverse effect resulting from invasive species found outside the designated site.

**3.4.8 Cumbria Marsh Fritillary site SAC**

This SAC is designated based on the presence of three marsh fritillary butterfly populations that may form a single metapopulation which, in conjunction with the Bassenthwaite Moss population in the River Derwent and Bassenthwaite Lake SAC, comprise a north-west set of populations which are genetically different to other UK populations.
In addition to the qualifying features above which are specifically addressed in the Habitats Regulations assessment, the following ecological features have also formed part of the consideration of potential for a likely significant effect and adverse effect on site integrity where these additional features may affect the attainment of the Conservation Objectives for the site in question. This methodology has always been adopted in the ALSE and AA process, even prior to the Halohan Case.

Cumbria Marsh Fritillary Site SAC - examples of additional supporting features considered:

- Supporting habitats including other areas outside the designated areas growing the foodplant of the marsh fritillary butterfly;
- Presence of competitors or predators;
- Other rich invertebrate populations in adjacent areas.

3.4.9 Allonby Bay MCZ

Allonby Bay MCZ was announced on 17th January 2016. It is an inshore site on the English side of the Solway Firth, that stretches from Dubmill Point to north of Maryport and covers approximately 40km². The MCZ was designated for the following habitat assemblages:

- Honeycomb worm *Sabellaria alveolata* reefs
- Blue mussel *Mytilus edulis* beds
- Intertidal and muddy sands and intertidal course sediments
- Subtidal sediments and sand
- Infralittoral rock
- Peat and clay exposures
- Intertidal rock (low, moderate and high energy)
- Intertidal biogenic reefs

In addition to the qualifying features above which are specifically addressed in the Habitats Regulations assessment, the following ecological features have also formed part of the consideration of potential for a likely significant effect and adverse effect on site integrity where these additional features may affect the attainment of the Conservation Objectives for the site in question. This methodology has always been adopted in the ALSE and AA process, even prior to the Halohan Case.

Allonby Bay MCZ - examples of additional supporting features considered:
3.5 Qualifying Features of Natura 2000 sites and Potential Impacts

Information on each of the Natura 2000 sites is provided in the Table 1 below which is a screening matrix indicating potential for likely significant effects as a result of Site Allocations.

Table 1. Information on each of the Natura 2000 Sites

| Solway Firth pSPA including Upper Solway Flats and Marshes SPA/Ramsar |
|-----------------------------|-----------------------------|
| **SPA Code**                | UK9005012                   |
| **Site Area**               | 44,000 ha                   |
| **Grid Reference**          | NY144648                    |
| **Description and Nature Conservation Objectives** | Solway Firth pSPA comprises the Upper Solway Flats and Marshes SPA, which is proposed to be extended down the Cumbrian Coast as far as Whitehaven. The site lies along the north-west coast of Allerdale and extends over to the Dumfries and Galloway coastline. In-combination impacts have therefore also been considered in conjunction with Dumfries and Galloway Authority plans and policies. The site supports important numbers of over wintering bar-tailed godwit, barnacle goose, curlew, dunlin, Eurasian teal, goldeneye, golden plover, knot, northern shoveler, oystercatcher, pink-footed goose, pintail, redshank, sanderling, scaup, shelduck, turnstone and Whooper swan. It is one of the largest least industrialized, warm and sandy estuaries in Europe and is used by other overwintering birds in Europe in periods of extreme cold. It provides the third largest continuous area of intertidal habitats in the UK and is an essential resting and over wintering area for birds migrating along the eastern Atlantic seaboard. The saltmeadows are important for waterfowl including the entire Svalbard population of barnacle goose. The February 2019 'European Site Conservation Objectives for Upper Solway Flats and Marshes Special Protection Area & Solway Firth potential Special Protection Area, Site Code: UK9005012' by Natural England, seeks to '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’.

The Solway Firth is also a migratory passage to and from spawning and nursery grounds for sea and river lamprey which are qualifying features of the SAC. The mudflats and sandflats of the inner estuary provide nursery and feeding grounds for other important fish species.

The six channels in the estuary have constantly changing patterns of erosion and deposition, and it contains the third largest area of continuous intertidal mudflats and sandflats in the UK. Estuarine plant species such as sea purslane, common sea lavender and lax-flowered sea-lavender are at their northern limit in Britain here.

The last condition assessments were carried out over the period 2006 – 2012, at which time the majority of units were classified as in favourable, with some unfavourable recovering. Reasons given for adverse condition are the impact of past application of artificial fertilisers.

<table>
<thead>
<tr>
<th>Potential Impacts of Developments Proposed in Site Allocations</th>
</tr>
</thead>
<tbody>
<tr>
<td>A number of factors have been identified as having potential to result in reduction, damage to or loss of qualifying features. Previous consultation with Natural England by WYG in 2007 identified the following factors as most likely to adversely affect the site –</td>
</tr>
<tr>
<td>• Potential death or injury to SPA birds and Marine Conservation area mammals through installation and operation of offshore and onshore wind farms;</td>
</tr>
<tr>
<td>• Overgrazing of salt meadows – though this impact is not considered to be relevant to policies contained in the Local Plan;</td>
</tr>
<tr>
<td>• Natural coastal processes – these may be interfered with as a result of works such as flood defence works, and port developments;</td>
</tr>
<tr>
<td>• Disturbance of bird roosts and foraging areas by human activity – as a result of increased housing, employment, tourism along the coastal area;</td>
</tr>
<tr>
<td>• Water-based recreation resulting in injury or death to wildlife, pollution, litter and erosion of habitats;</td>
</tr>
<tr>
<td>• Fisheries – potential for increased pressure on resources as a result of increased population, and hence increases in fishing, and damage of marine benthic habitat directly through fishing methods;</td>
</tr>
</tbody>
</table>
- Physical disturbance such as trampling – again related to increased recreational use as a result of increased local population and/or increased pressure of tourism along the coast.

Additional factors identified by SNH considered likely to affect the qualifying features include –

- Harvesting of intertidal shellfish, bait and blue mussel industry.
- Navigation and maintenance dredging, including existing and capital dredging including spoil disposal.

Less important factors in terms of maintaining favourable condition (as identified through consultation with Natural England) include –

- Nutrient enrichment via agricultural run-off – particularly affecting the upper reaches and shoreline where increased fertility due to run-off could give rise to algal blooms, and subsequent eutrophication and deoxygenation – in the case of site allocations this impact may be reduced as agricultural land becomes developed;

- Nutrient enrichment via wastewater treatment works and untreated contaminated run-off impacting on the estuarine/marine environment in combination with other discharges – overloading as a result of actions such as additional development; agricultural improvement; new housing estates, and industrial development;

- Fly-tipping – as a result of increased population and developments along the coastal belt;

- Artificial barriers to fish dispersal – potential for interference to the passage of migratory fish – Workington Lower Derwent Valley developments if require piling operations adjacent to the river;

- Siltation – possibly as a result of deterioration of water quality or reduction in flows;

- Coastal squeeze – habitat loss related to development along the coast both sides of the estuary involving a combination of effects due to land reclamation, coastal flood defences, drainage schemes, coastal erosion and sea level rise;

- Loss of area to land reclamation – land-take for development, unlikely within SPA itself – however loss of coastal fields could impact indirectly due to loss of roosting and foraging sites for SPA birds.

Solway Firth SAC

| SAC Code   | UK0013025 |
### Description and Nature Conservation Objectives

The Natura 2000 Standard Data Form (2016) describes the SAC as:

- ‘Sandbanks which are slightly covered by sea water all the time for which this is considered to be one of the best areas in the United Kingdom.
- Estuaries for which this is considered to be one of the best areas in the United Kingdom.
- Mudflats and sandflats not covered by seawater at low tide for which this is considered to be one of the best areas in the United Kingdom.
- Reefs for which the area is considered to support a significant presence.
- Perennial vegetation of stony banks for which the area is considered to support a significant presence.
- Salicornia and other annuals colonising mud and sand for which this is considered to be one of the best areas in the United Kingdom.
- Atlantic salt meadows (Glauco-Puccinellietalia maritimae) for which this is considered to be one of the best areas in the United Kingdom.
- Fixed dunes with herbaceous vegetation (grey dunes) for which the area is considered to support a significant presence.
- "Petromyzon marinus" for which this is considered to be one of the best areas in the United Kingdom.
- "Lampetra fluviatilis" for which this is considered to be one of the best areas in the United Kingdom.

Natural England (2018), ‘European Site Conservation Objectives for Solway Firth Special Area of Conservation Site Code: UK0013025’ confirm the following conservation objectives:

- 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.

The last condition assessments were carried out over the period 2006–2012, at which time the majority of units were classified as in favourable, with some unfavourable recovering. Reasons given for adverse condition are the impact of past application of artificial fertilisers.

### Potential Impacts of Developments Proposed in Site Allocations

Threats from Natura 2000 form (2016) are listed as fishing and harvesting aquatic resources, grazing and renewable abiotic energy use.

The Site Improvement Plan for the Solway Firth (Natural England, 2014) lists the following threats to the SAC:

- Change in species distributions
- Energy production
- Coastal squeeze
- Water pollution
- Air Pollution: (risk of atmospheric nitrogen deposition)
- Public access / disturbance
- Fisheries (commercial and estuarine) and aquaculture
- Invasive species
- Change in land management

### South Solway Mosses SAC

<table>
<thead>
<tr>
<th>SAC Code</th>
<th>UK0030310</th>
</tr>
</thead>
<tbody>
<tr>
<td>Site Area</td>
<td>1956 ha</td>
</tr>
<tr>
<td>Grid Reference</td>
<td>NY203597</td>
</tr>
</tbody>
</table>

Description and Nature

South Solway Mosses comprises four sites in Allerdale on the northern coastal plain adjacent to the Solway Firth between Aspatria and Carlisle. They have been designated for their habitat qualifying features of ‘active raised bog’ and ‘degraded raised bog still capable of restoration’. In view...
Conservation Objectives

of the fragility of this habitat type and huge losses in habitat area in the UK, the degraded bog has been included as a SAC with the aim of improving the existing habitat. There are no overall conservation objectives for the SAC itself but this is made up of SSSI units for which there are clear objectives stating that subject to natural change, the active raised bog should be maintained in favourable condition. The maintenance implies that restoration of the degraded bog is included as an objective until it is in favourable condition.

Natural England have provided detailed information on how the favourable condition of the site is to be assessed, with the following elements required for favourable status –

- High cover of peat forming Sphagnum species throughout;
- High cover of other positive indicator species in appropriate vegetation communities;
- High and stable water table, reflected by measurements on and off the mire;
- Less than 10% cover of bracken or scrub on the mire;
- Less than 10% cover of purple moor-grass on the mire dome;
- Presence and extent of appropriate habitat on the edge of the bog and in the surrounding area;
- Suitable bog profile and topography; and
- Vegetation community presence and extent.

The Solway Mosses are of value to the Natura 2000 network due to the loss in the past of significant areas of bog habitats. They represent examples of a habitat which is now uncommon, and although fragmented, provide linkages with one another and with the Solway Firth Marine Site in terms of wildlife supported and biodiversity. Bowness Common is one of the largest active raised bogs remaining in the UK. Wedholme Flow contains the largest area of almost-intact active raised bog in England, together with some degraded bog where peat cutting has now ceased. Glasson Moss supports some of the most diverse raised bog vegetation in UK.

At the present time, the majority of the site is considered to 'unfavourable recovering' due to birch regeneration, the presence of birch and scrub stands on the site and inappropriate drainage.

Potential Impacts of Developments Proposed in Site Allocations

Based on previous discussions with Natural England a number of factors which could result in a reduction or loss of qualifying features are listed below. Most important factors likely to cause significant effects on the SAC are:

- New or inappropriate drainage schemes;
• Changes in water quality, in particular caused by agricultural run-off and/or effluent discharges;
• Scrub/tree/bracken encroachment through lack of management.

Less important factors in terms of maintenance of favourable condition include –
• Invasive plants;
• Physical disturbance e.g. trampling;
• Litter/fly-tipping.

Lake District High Fells SAC

<table>
<thead>
<tr>
<th>Description and Nature Conservation Objectives</th>
</tr>
</thead>
</table>
| The Lake District High Fells SAC comprises a large area of the Lakeland fells some of which fall within the 15km buffer zone around Allerdale. It consists of many Sites of Special Scientific Interest (SSSI). Qualifying features are provided in Chapter 3.4 and further details in Appendix B. The site includes tall herb ledge communities with scarce plants and screes with parsley fern. Ancient acidic oakwoods with rich bryophyte and lichen flora occur in the valleys and lower fell slopes. The designation includes the clear nutrient poor tarns. There are no overall conservation objectives for the whole SAC but individual SSSIs have draft conservation objectives for their features which have been provided in confidence by Natural England during earlier assessment in 2007. These are extremely detailed and therefore this section presents a summary of available conservation objectives where these relate to the SAC qualifying features. Conservation objectives aim to maintain existing habitats in favourable condition, and to maintain the extent of the habitat. Maintenance implies restoration if evidence from condition assessment indicates a reduction in extent. Habitat condition is assessed through looking at the following attributes of the site:
• Presence and distribution of characteristic positive indicator species;
• Characteristic zones of vegetation;
• Low cover of algae; |
• Low cover of bracken, trees and scrub for heathland and grassland habitats;
• Low cover of non-native species;
• Low cover of negative indicator species;
• Low levels of grazing/browsing;
• No evidence of burning or other disturbance such as mowing;
• Low levels of artificial drainage;
• Low levels of physical disturbance;
• Low levels of erosion;
• Low cover of disturbed bare ground;
• Natural topography/morphology of site;
• Vegetation community composition;
• Vegetation structure including age composition and recruitment of young individuals of positive indicator species;
• Presence of dead wood (woodland habitat);
• Natural hydrological regime;
• Natural sediment load;
• No impact from artificial structures;
• No impact from recreational activities.

At the present time the majority of the site is considered to be ‘unfavourable recovering’, due to the implementation of suitable grazing regimes likely to result in favourable condition over time.

<table>
<thead>
<tr>
<th>Potential Impacts of Developments Proposed in Site Allocations</th>
</tr>
</thead>
<tbody>
<tr>
<td>There are a number of potential impacts arising which could affect the qualifying interest features of this SAC as a result of developments. The following factors have been identified as having potential to adversely affect the integrity of the SAC based on previous consultation with Natural England –</td>
</tr>
<tr>
<td>Climate change;</td>
</tr>
<tr>
<td>Air quality;</td>
</tr>
<tr>
<td>Water quality – organics/silt from physical disturbance;</td>
</tr>
<tr>
<td>Drainage (new or inappropriate);</td>
</tr>
</tbody>
</table>
The following factors have been identified as less important in terms of maintaining favourable condition:

- Physical disturbance to habitat e.g. increased local population;
- Water quality – effluent discharges, construction run-off;
- Invasive plants.

<table>
<thead>
<tr>
<th>Clints Quarry SAC</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>SAC Code</td>
<td>UK0030035</td>
</tr>
<tr>
<td>Site Area</td>
<td>12.5 ha</td>
</tr>
<tr>
<td>Grid Reference</td>
<td>NY161357</td>
</tr>
</tbody>
</table>

Clints Quarry is located between Cockermouth and Aspatria in Allerdale, and comprises 2 sites totaling 12 hectares. The northern site lies within 250m of the A595 between Cockermouth and Carlisle. It has been designated based on the presence of a large population of great crested newts *Triturus cristatus* (GCN).

The main nature conservation objective is to maintain the GCN habitats in favourable condition, which also implies restoration if habitat is not already in favourable condition.

Favourable condition at this site is assessed based on requirements for successful breeding and foraging/hibernation/terrestrial refuges for GCN. The following are considered to be the main attributes of the site:

- Extent of pond habitat – number, distribution, depth and persistence of ponds to remain suitable
- Lack of pollution of ponds – if the viability of a pond as a breeding site is reduced due to pollution, this would be classified as unfavourable;
- Shading of ponds – a high level of shading, particularly on the southern margin, is considered unfavourable;
- Absence of fish – presence of predatory fish is considered unfavourable;
- Extent of terrestrial habitat – loss of area or fragmentation within the site would be considered unfavourable;
- Structure of terrestrial newt habitat – the presence of a variety of vegetation and habitat features is considered favourable. Roughly neutral PH, 75% of ponds deep enough to be able to retain water from February to August at least 1 year in 3. Good habitat connectivity. Suitable foraging within 500m of ponds. No barriers to movement between ponds. Absence of fish in at least 50% of ponds.
Natural England stated in their response that the presence of fish is considered to be an increasing problem. The most recent available condition assessment is dated May 2017 and records the condition of the site as unfavourable declining, due to the presence of stone loach in at least one of the ponds and a long period without rainfall leading to most ponds other than top Quarry pond 1 rapidly drying out.

The site is of importance to the Natura 2000 network as it provides a sustainable population of GCN with linkages to other wetland/ponds in North Allerdale, so helping to support the presence of other populations in the Borough.

### Potential Impacts of Developments Proposed in Site Allocations

The factors listed below are considered to have potential to affect the condition of the site which might result in loss or reduction of the GCN population:

- Chemical water quality/pollution of ponds, such as agricultural or road runoff;
- Physical water quality/pollution of ponds, such as silt;
- Introduction of fish populations or lack of management of fish populations;
- Natural processes e.g. pond succession;
- Inappropriate management of aquatic vegetation;
- Inappropriate management of terrestrial habitat;
- Disturbance from human activities.

The following factors have been identified as having potential to affect the habitats but are considered less important by Natural England in terms of maintaining favourable condition:

- Encroachment of trees/scrub around ponds;
- Spread of amphibian disease;
- The creation of barriers to newt dispersal.

### River Derwent and Bassenthwaite Lake SAC

<table>
<thead>
<tr>
<th>Description and Nature Conservation Objectives</th>
</tr>
</thead>
<tbody>
<tr>
<td>The River Derwent flows through Allerdale from Bassenthwaite Lake to the coast at Workington. Bassenthwaite Lake itself is upstream of the Borough so is not likely to be directly impacted by any of the Allerdale Local Plan policies but has been included because of indirect impacts such as tourism and polluted road run-off. Qualifying features are covered in section 3.4</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>SAC Code</th>
<th>UK0030032</th>
</tr>
</thead>
<tbody>
<tr>
<td>Site Area</td>
<td>1794 ha</td>
</tr>
<tr>
<td>Grid Reference</td>
<td>NY262207</td>
</tr>
</tbody>
</table>
and Appendix B. Bassenthwaite Lake is a mesotrophic water body supporting one of only two UK populations of vendace fish, the other being found in Derwentwater. There are good populations of sea, brook and river lamprey, otter, floating water plantain and Atlantic salmon present which are qualifying features of the SAC.

The nature conservation objectives for habitat features of the site are to maintain the extent of each designated habitat type, which implies restoration if the condition assessment suggest any reduction in extent. Conservation objectives for the qualifying species are to maintain the populations in favourable condition, as outlined by Natural England:

- Maintain population presence, size/abundance and distribution;
- Maintain ratio of sea and winter populations;
- Maintain population structure, i.e., evidence of continued recruitment to population in form of juvenile population densities, different size classes etc.

No conservation objective has been suggested specifically for marsh fritillary, but the aim would be to maintain the population of marsh fritillary in a favourable condition.

The site is divided into a large number of units for condition assessment purposes. During the last condition assessments dated 2009-2013, the condition of the majority of units was identified 'unfavourable no change', with the the 'favourable' and 'unfavourable recovering' categories making up the majority of the remaining units with more or less even split between the categories. Nine units were also classified as 'unfavourable – no change'. Reasons given for adverse conditions were invasive freshwater species (signal crayfish and Crassula helmsii), inappropriate scrub control, public access/disturbance and overgrazing.

The unfavourable units lower section below Derwentwater lake on the lowland floodplain is impacted by realignment and straightening which has resulted in a uniform cross-section. Through Cockermouth and Workington there is frequent bank protection and development on the floodplain, with numerous sewage works and a minewater discharges into the River Derwent. There are also invasive species – Himalayan balsam and Japanese knotweed along parts of this reach. Although bank protection cannot be removed from Cockermouth, mitigation for this reach might include restoration of the natural watercourse downstream by reinstatement of meander bends, reprofiling of banks and removal of embankments and weirs where not necessary.

### Potential Impacts of Developments Proposed in Site Allocations

A number of factors could result in reduction or loss of the qualifying features. Based upon consultation with Natural England, the following factors have been identified as most important or likely to adversely affect the SAC:

- Water quality – agricultural runoff;
- Water quality – organics/silt from disturbance of watercourse;
Water quality – in general;
- Drainage;
- Invasive plant and animal species;
- Barriers to fish dispersal;
- Abstraction;
- Bank erosion;
- Grazing;
- Unsuitable management of vegetation structure for marsh fritillary;
- Modification of river channels.

The following factors have been identified by Natural England as less important in terms of maintaining favourable condition:
- Inappropriate management of water levels;
- Disturbance from recreation, etc;
- Physical disturbance e.g. boating;
- Commercial and recreational fishing;
- Fish stocking;
- Encroachment of scrub/trees/bracken;
- Deer populations.

**Cumbria Marsh Fritillary Site SAC**

<table>
<thead>
<tr>
<th>SAC Code</th>
<th>UK0030126</th>
</tr>
</thead>
<tbody>
<tr>
<td>Site Area</td>
<td>23 ha</td>
</tr>
<tr>
<td>Grid Reference</td>
<td>NY400409</td>
</tr>
</tbody>
</table>

**Description and Nature Conservation Objectives**

This designation comprises three marsh fritillary populations forming a single meta-population, linked to the population at Bassenthwaite Moss. These sites are important as the north-west populations are genetically different to other English populations. The larval food plant is devil’s bit scabious so it is important to prevent any reduction in the extent of this flowering species. The maintenance of linked populations is critical to the survival of this species.

**Potential Impacts of Developments**

The marsh fritillary relies on its larval food plant so any changes resulting in loss of this in the habitat will adversely impact on the butterfly populations. Changes to the habitat due to drainage schemes or excessive...
flooding/erosion/sedimentation could affect these areas as could any overgrazing, mowing or burning.

<table>
<thead>
<tr>
<th>Proposed in Site Allocations</th>
<th>Allonby Bay MCZ</th>
</tr>
</thead>
<tbody>
<tr>
<td>Site code</td>
<td></td>
</tr>
<tr>
<td>Site Area</td>
<td>40km²</td>
</tr>
<tr>
<td>Grid Reference</td>
<td>NY040420</td>
</tr>
<tr>
<td>Description and Nature Conservation Objectives</td>
<td>The site is designated for the diverse range of marine habitats it supports, including Honeycomb worm reefs and intertidal sands which host a range of species including shrimp-like sand hoppers, cockles, sea snails and worms.</td>
</tr>
<tr>
<td>Potential Impacts of Developments Proposed in Site Allocations</td>
<td>A number of factors have been identified as having potential to result in reduction, damage to or loss of qualifying features. The following factors most likely to adversely affect the site –</td>
</tr>
<tr>
<td></td>
<td>• Natural coastal processes – these may be interfered with as a result of works such as flood defence works, and port developments;</td>
</tr>
<tr>
<td></td>
<td>• Water-based recreation resulting in injury or death to wildlife, pollution, litter and erosion of habitats;</td>
</tr>
<tr>
<td></td>
<td>• Fisheries – potential for increased pressure on resources as a result of increased population, and hence increases in fishing, and damage of marine benthic habitat directly through fishing methods;</td>
</tr>
<tr>
<td></td>
<td>• Physical disturbance such as trampling – again related to increased recreational use as a result of increased local population and/or increased pressure of tourism along the coast.</td>
</tr>
<tr>
<td></td>
<td>Other factors that may cause detrimental effects include –</td>
</tr>
<tr>
<td></td>
<td>• Nutrient enrichment via agricultural run-off – particularly affecting the upper reaches and shoreline where increased fertility due to run-off could give rise to algal blooms, and subsequent eutrophication and deoxygenation – in the case of site allocations this impact may be reduced as agricultural land becomes developed;</td>
</tr>
<tr>
<td></td>
<td>• Nutrient enrichment via wastewater treatment works and untreated contaminated run-off impacting on the marine environment in combination with other discharges – overloading as a result of actions such as additional development; agricultural improvement; new housing estates, and industrial development;</td>
</tr>
<tr>
<td></td>
<td>• Siltation – possibly as a result of deterioration of water quality or reduction in flows;</td>
</tr>
</tbody>
</table>
4.0 Stage 1 Screening – Site Allocations

4.1 Screening of Site Allocations

There are 354 Site Allocations which have been put forward under the ABC Local Plan.

In assessing the potential for effect arising from these options, the Natural England 'Impact Risk Zones' (IRZ) have also been taken into account. These have been created around each SSSI (at varying distances) and are dependent upon the sites’ notified features and its sensitivity to impacts, such as disturbance, air and water pollution, and water abstraction. As the vast majority of European sites are underpinned by SSSIs, they therefore share the same IRZs. In addition, certain European sites may also have wider IRZ distances, depending upon the European site features and their sensitivities. A ‘typical’ biological SSSI will have 9 IRZs set at different distances ranging from 50m to 20km from the SSSI. Each IRZ indicates the types of proposals/developments which at that distance are likely to have an impact on the site and are therefore considered to be medium or high risk. Whilst these zones provide a guide as to potential risk of effects, more detailed desk study of individual sites and local knowledge of Allerdale has also been used in this assessment.

Maps showing all 354 Site Allocations can be found in the Allerdale Local Plan Part 2 Site Allocations Document (ABC, 2018, amended July 2019). Appendix A of this HRA contains Figures 1a, 1b, and 2 showing the location of site allocations within Allerdale. The summary matrix of the screening assessment is provided in Table 2 in section 4.2 below. The table also includes Stage 2 – Appropriate Assessment. Listed below are the site allocations assessed in this HRA. Table 2 has been amended to provide links for each assessment to relevant Policies in the Local Plan which provide additional protection for Natura 2000 sites.

The most relevant Allerdale Local Plan 2014 policies (offering protection to Natura 2000 sites and also to general biodiversity and green networks) are –

- Policy S17 Tourism, Coastal and Countryside Recreation – see para. 195, 199 and 200;
- Policy S24 Green Infrastructure – supporting biodiversity and connectivity between habitats throughout Allerdale;
- Policy S34 Development in the Solway Coast Area of Outstanding Natural Beauty – para. 317;
- Policy S35 Protecting and Enhancing Biodiversity and Geodiversity – para. 325;
- Policy S36 Air, Water and Soil Quality – protection and enhancement of air and water quality;
- Policy S37 Shoreline Management and Coastal Development – para. 336;
- Policy DM17 Trees, Hedgerows and Woodland – retention of trees and hedgerows across the borough.
RESIDENTIAL HOUSING SITE ALLOCATIONS – Policies SA8 to SA29

Policy SA8 – Land off Stainburn Road, Workington – previously 1/WOR/053A/R
Policy SA9 – Main Road, Harrington, Workington – previously 1/WOR/056/R;
Policy SA10 – Land off Seaton Road, Seaton, Workington – previously 1/WOR/064/R;
Policy SA11 – Former Southfield School, Workington – previously 3/WOR/084/R;
Policy SA12 – Maryport Marina, Maryport — previously 1/MAR/013/R;
Policy SA13 – Whitcroft, Maryport – previously 1/MAR/017/A/R;
Policy SA14 – Land off Syke Road, Wigton – previously 4/WIG/034/R;
Policy SA15 – Land adjacent to Rugby Club, Station Road, Aspatria – previously 1/ASP/004/R;
Policy SA16 – Land at Noble Croft, Aspatria – previously 1/ASP/006/A/R;
Policy SA17 – Land at Station Road, Aspatria – previously 4/ASP/014/A/R;
Policy SA18 – Land off Brayton Road, Aspatria – previously 1/ASP/003/R;
Policy SA19 – Fellview, Silloth – previously 1/SIL/002;
Policy SA20 – Land adjacent to Wheatsheaf Inn, Abbeytown – previously 1/ABB/002/A/R;
Policy SA21 – Land at Main Road, Abbeytown – previously 4/ABB/007/R;
Policy SA22 – Land at Abbey Road, Abbeytown – previously 4/ABB/008/R;
Policy SA23 – Land adjacent to Meadowlands, Broughton Moor – previously 4/BRM/010/R;
Policy SA24 – Rose Farm, Broughton (Great and Little Broughton) – previously 1/BRN/007/R;
Policy SA25 – Land at the rear of Marona, West Lane, Flimby – previously 4/FLI/014/R;
Policy SA26 – Lynholme, Kirkbride – previously 3/KBR/010/R;
Policy SA27 – Birch Hall Lane, Kirkbride – previously 3/KBR/009/R;
Allerdale Borough Council – Habitats Regulations Assessment of Local Plan Site Allocations September 2019

Policy SA28 – Land to the rear of Bank House, Prospect – previously 1/PRO/001/A/R;

Policy SA29 – Land to the west of Matty Lonning, Thursby – previously 4/THU/017/R

GYPSY/TRAVELLER SITE ALLOCATION – Policy SA31

Policy SA31 – Former caravan park, Oldside – previously part of Biodiversity site at Oldside – 3/WOR/096/GT

EMPLOYMENT SITE ALLOCATIONS – Policies SA36 to SA45

Policy SA36 – Land north of the Port of Workington – previously 1/WOR/032/A/E;

Policy SA37 – Land at Oldside, Workington – previously 1/WOR/034/A/E;

Policy SA38 – Land off Jubilee Road, Lillyhall – previously 1/WOR/046/E;

Policy SA39 – Land off Joseph Noble Road, Lillyhall – previously 1/WOR/047/M;

Policy SA40 – Land off Hallwood Road, Lillyhall – previously 1/WOR/048/M;

Policy SA41 – Land north of Branthwaite Road, Lillyhall – previously 1/WOR/049/A/M;

Policy SA42 – Land at Glasson Industrial Estate, Maryport – previously 1/MAR/009/A/E;

Policy SA43 – Land north of Low Road, Cockermouth – previously 3/COC/019/E;

Policy SA44 – Land south of Low Road, Cockermouth – previously 3/COC/025/E;

Policy SA45 – Land at Aspatria Business Park – previously 3/ASP/014/E.

RETAIL SITE ALLOCATIONS – Policies SA46 to SA48

Policy SA47 – Central Car Park, Workington – previously 3/WOR/086/S;

## 4.2 Screening Matrix for Site Allocations

### Table 2: Screening Matrix for Site Allocations

<table>
<thead>
<tr>
<th>ALLOCATION SITE</th>
<th>APPROX. DISTANCE FROM NATURA 2000 SITES</th>
<th>POTENTIAL EFFECTS IN ISOLATION</th>
<th>POTENTIAL FOR IN-COMBINATION EFFECTS?</th>
<th>AA</th>
<th>AVOIDANCE/MITIGATION</th>
<th>RESIDUAL EFFECTS</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Residential Housing Sites</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Policy SA9</strong>&lt;br&gt;1/WOR/053/ALT Land at Stainburn Road, Workington</td>
<td>0.48km to North/North West</td>
<td>River Derwent and Bassenthwaite Lake SAC&lt;br&gt;• There are potential direct and indirect effects via hydrological connectivity to the site. The site is bordered by a drainage ditch and appears to flow into Scale Beck approximately 490 metres west/south west of the site. Scale Beck joins the River Derwent north of Stainburn. Therefore, potential pollution effects could occur to the SAC from the site.&lt;br&gt;• Although the site appears to be within a woodland, situated adjacent to open countryside, it is unlikely that other (a qualifying species for the SAC) will be directly affected as the site is separated from the SAC by the residential area of Stainburn.&lt;br&gt;• Other potential effects of the adjacent increased population and/or employment are less direct as the site has no access to the river at this point - recreational pressure on river including fishing and boating, and use of the riverside path (although there is presently no right of way shown along the south bank of the river); traffic; dog walking; accidental spillages and leakages. Potential for noise and lighting disturbance.&lt;br&gt;• Qualifying features of the SAC include migratory fish (Atlantic salmon, sea lamprey and river lamprey) and otter which will also be present in the river estuary, tributaries and port areas.</td>
<td>• Potential for decrease in water quality, as result of in-combination effect of multiple sites discharging into a SAC watercourse catchment; potential for impact on migratory fish and otter in downstream catchment.&lt;br&gt;• Taking account of the proximity of the SAC and the number of other development sites being considered in the area, the increase in population level as a result of other allocation sites has potential to affect the recreational pressure upon the designated sites.</td>
<td>Provided that pollution prevention measures are adopted both during and after construction, there is unlikely to be any significant effect as a result of water quality on any qualifying feature of Natura 2000 sites.&lt;br&gt;• Provision of access to and on-site land for alternative recreational pursuits; consider improving local footpath network and linkages from development site to these as part of development; provide alternative parking locations with easier coastal access avoiding sensitive areas</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Policy SA8</strong>&lt;br&gt;3.9km to west</td>
<td>3.9km to west</td>
<td>Solway Firth pSPA&lt;br&gt;• Potential connectivity to Solway Firth via the River Derwent. The site does not drain directly into the River Derwent but is connected via the watercourse flowing westwards along the southern boundary of the site and into the River Derwent via Scale Beck.&lt;br&gt;• Potential use of land by SPA birds</td>
<td>• Considered unlikely to have any significant effect on qualifying features of the Solway Firth pSPA due to the size of development proposed (130 units) but potential for in-combination effects of a) increased recreational use of the coast and b) cumulative loss of functionally linked land for pSPA birds</td>
<td>SPA bird surveys&lt;br&gt;• Provided that pollution prevention measures are adopted both during and after construction, there is unlikely to be any significant effect as a result of water quality on any qualifying feature of Natura 2000 sites.&lt;br&gt;• Provision of access to and on-site land for alternative recreational pursuits; consider improving local footpath network and linkages from development site to these as part of development; provide alternative parking locations with easier riverside access avoiding sensitive areas.&lt;br&gt;• Policy SA8 – wide buffer zone of native planting and retention of marshy grassland around the watercourse; Hedgerow Assessment required; scope for enhanced green infrastructure; potential for net gain in biodiversity.&lt;br&gt;• Local Plan Policies S17, S24, S35, S36, S37</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Policy SA9</strong>&lt;br&gt;3.9km to North</td>
<td>River Derwent and Bassenthwaite Lake SAC&lt;br&gt;• No potential wildlife corridor linkages identified.</td>
<td>• Taking account of the proximity of the SAC and the total number of other development sites being</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Allerdale Borough Council – Habitats Regulations Assessment of Local Plan Site Allocations | September 2019
<table>
<thead>
<tr>
<th>ALLOCATION SITE</th>
<th>APPROX. DISTANCE FROM Natura 2000 SITE</th>
<th>POTENTIAL EFFECTS IN ISOLATION</th>
<th>POTENTIAL FOR IN-COMBINATION EFFECTS?</th>
<th>AA</th>
<th>AVOIDANCE/MITIGATION</th>
<th>RESIDUAL EFFECTS?</th>
</tr>
</thead>
<tbody>
<tr>
<td>1/WOR/056/R Land at Main Road, Harrington, Workington</td>
<td>1.9km to the east</td>
<td>Solway Firth pSPA No direct hydrological connections, between the sites. Considered unlikely to have any significant effect on qualifying features of the Solway Firth pSPA due to the level of development proposed and distance from the Natura 2000 site.</td>
<td>- No significant effect.</td>
<td>considered in the area, the increase in population level as a result of other allocation sites has potential to affect the recreational pressure upon this designated site. However, the accessible areas along the river in the vicinity of this site in Workington are already subject to human disturbance, dog walkers etc so no likely significant effects anticipated.</td>
<td>Y</td>
<td>Provision of access to and on-site land for alternative recreational pursuits; consider improving local footpath network and linkages from development site to these as part of development; provide alternative parking locations with easier coastal access avoiding sensitive areas</td>
</tr>
<tr>
<td>Policy SA10 1/WOR/064/AR Land off Seaton Road, Seaton, Workington</td>
<td>0.3km to South</td>
<td>River Derwent and Bassenthwaite Lake SAC - There are no direct or indirect hydrological linkages to the River Derwent SAC, and no significant effects are likely with regards water quality. - Potential for otter to be affected is considered negligible as there are many areas along the riparian corridor where public access isn’t readily available, thereby enabling otter to continue to optimise on its use. - Increased population resulting in recreational pressure on river including fishing and boats, and use of the Cumbria coastal path; traffic; dog walking – all considered to be insignificant due to the additional opportunities for recreation from this area including the coast, woodlands, network of local footpaths and the nearby Lake District National Park.</td>
<td>- No direct hydrological connections.</td>
<td>Taking account of the proximity of the SAC and the number of other development sites being considered in the area, the increase in population level as a result of other allocation sites has potential to affect the recreational pressure upon the designated site. However, the accessible areas along the river are already subject to human disturbance, dog walkers etc so no likely significant effects anticipated.</td>
<td>N</td>
<td>No likely significant effects anticipated.</td>
</tr>
<tr>
<td>Policy SA11 3/WOR/084/R Former Southfield School</td>
<td>1.9km to the north-west</td>
<td>Solway Firth pSPA - No direct hydrological connections, between the sites. Potential connectivity as groundwater drainage to Eller Beck and the River Wyre but no direct hydrological connections. - Considered unlikely to have any significant effect on qualifying features of the Solway Firth pSPA due to the size of development proposed and distance from the Natura 2000 site. Potential pSPA birds using site on functionally linked land.</td>
<td>- No direct pathways likely to cause significant effect.</td>
<td>Potential in-combination loss of functionally linked land for SPA birds due to other developments in close proximity to coast; Increased recreational pressure on nearby shoreline</td>
<td>Y</td>
<td>SPA bird surveys; Local Plan Policies S17, S35, S36, S37</td>
</tr>
<tr>
<td></td>
<td>2.6km to North-East</td>
<td>River Derwent and Bassenthwaite Lake SAC - No direct access to River Derwent. Potential indirect effect from increased population (65 units proposed) resulting in recreational pressure on river including fishing and boats, and use of the Cumbria coastal path; traffic; dog walking ruled out as all considered to be insignificant due to the abundant opportunities for recreation from this urban area including the coast, woodlands, network of local footpaths and the nearby Lake District National Park.</td>
<td>- No direct pathways likely to cause significant effect.</td>
<td>Taking account of the proximity of the SAC and the number of other development sites being considered in the area, the increase in population level as a result of other allocation sites has potential to affect the recreational pressure upon the designated site. The accessible areas along the River Derwent are situated within an urban setting of Workington which are already subject to human disturbance, dog walkers, traffic etc and not readily accessible from this particular site allocation which is on the opposite side of Workington so no likely significant effects anticipated.</td>
<td>N</td>
<td>No likely significant effects anticipated.</td>
</tr>
<tr>
<td></td>
<td>6km to East</td>
<td>River Derwent and Bassenthwaite Lake SAC - No direct pathways likely to cause significant effect.</td>
<td>- Potential indirect effect from increased population resulting in recreational pressure on river including fishing and boats, and use of the Cumbria coastal path; traffic; dog walking ruled out as all considered to be insignificant due to the abundant other opportunities for recreation from this urban area including the coast, woodlands, network of local footpaths and the nearby Lake District National Park.</td>
<td>Taking account of the proximity of the SAC and the number of other development sites being considered in the area, the increase in population level as a result of other allocation sites has potential to affect the recreational pressure upon the designated site. The accessible areas along the River Derwent are situated within an urban setting of Workington which are already subject to human disturbance, dog walkers, traffic etc and not readily accessible from this particular site allocation which is on the opposite side of Workington so no likely significant effects anticipated.</td>
<td>N</td>
<td>No likely significant effects anticipated.</td>
</tr>
<tr>
<td>ALLOCATION SITE</td>
<td>APPROX. DISTANCE FROM NATURE 2000 SITES</td>
<td>POTENTIAL EFFECTS IN ISOLATION</td>
<td>POTENTIAL FOR IN-COMBINATION EFFECTS?</td>
<td>AA</td>
<td>AVOIDANCE/MITIGATION</td>
<td>RESIDUAL EFFECTS</td>
</tr>
<tr>
<td>-----------------</td>
<td>----------------------------------------</td>
<td>-------------------------------</td>
<td>---------------------------------------</td>
<td>----</td>
<td>-----------------------</td>
<td>-----------------</td>
</tr>
<tr>
<td>3km to west</td>
<td>Solway Firth pSPA</td>
<td>No likely significant effects anticipated.</td>
<td>N</td>
<td>- No likely significant effects anticipated</td>
<td>None</td>
<td></td>
</tr>
<tr>
<td>4.9km to the west</td>
<td>Solway Firth pSPA</td>
<td>No likely significant effects anticipated.</td>
<td>N</td>
<td>- No likely significant effects anticipated</td>
<td>None</td>
<td></td>
</tr>
<tr>
<td>4.3km to South/South East</td>
<td>Solway Firth pSPA</td>
<td>No likely significant effects anticipated.</td>
<td>N</td>
<td>- No likely significant effects anticipated</td>
<td>None</td>
<td></td>
</tr>
<tr>
<td>0.5km to the west</td>
<td>Solway Firth pSPA</td>
<td>No likely significant effects anticipated.</td>
<td>N</td>
<td>- No likely significant effects anticipated</td>
<td>None</td>
<td></td>
</tr>
<tr>
<td>12.9km to East</td>
<td>Solway Firth pSPA</td>
<td>No likely significant effects anticipated.</td>
<td>N</td>
<td>- No likely significant effects anticipated</td>
<td>None</td>
<td></td>
</tr>
</tbody>
</table>

**Policy SA13**

**1.5km to East**

- **River Derwent and Bassenthwaite Lake SAC**
  - Significant effect of multiple sites discharging into SPA, including the coast, woodlands, network connectivity and wildlife site.
  - Potential to cause disturbance and loss of foraging, roosting and foraging land for pSPA birds.
  - Potential for disturbance to EC designated features of the SPA.
  - Potential for decrease in water quality as result of pollution prevention measures adopted during and after construction, there is unlikely to be any significant effect as a result of water quality on Natura 2000 sites.
  - Potential for disturbance to EC designated features at the SPA.

**Policy SA14**

- **South Solway Mosses SAC**
  - Potential for increase recreational use of the Mosses but far enough away from the new areas of housing.
  - No likely significant effects anticipated.

---

*Allerdale Borough Council – Habitats Regulations Assessment of Local Plan Site Allocations September 2019*
### Allerdale Borough Council – Habitats Regulations Assessment of Local Plan Site Allocations September 2019

#### ALLOCATION SITE

<table>
<thead>
<tr>
<th>ALLOCATION SITE</th>
<th>APPROX. DISTANCE FROM NATURA 2000 SITE</th>
<th>POTENTIAL EFFECTS IN ISOLATION</th>
<th>POTENTIAL FOR IN-COMBINATION EFFECTS?</th>
<th>AVA. AVOIDANCE/MITIGATION</th>
<th>RESIDUAL EFFECTS</th>
</tr>
</thead>
<tbody>
<tr>
<td>4/1G/034/R Land off Syke Road, Wigton</td>
<td>- There is no pathway of effect to Wedholme Flow as drainage from the site flows via the Back Beck into the River Wampool which flows to the east of the Mosses site and downstream of the raised bog.</td>
<td>- There is potentially suitable land for SPA birds to roost or forage, but this is located a long way inland with more suitable habitats closer to the coast, so unlikely to result in any cumulative loss of SPA bird habitat.</td>
<td>N</td>
<td>No likely significant effects anticipated.</td>
<td>None</td>
</tr>
<tr>
<td>Solway Firth pSPA</td>
<td>- Potential connectivity as the Speet Gill along the northern side of the site flows northwards into the Wap Beck which drains into the River Wampool north of Dockcar Hall, and from there into the Solway Firth near Anthorn. However this connectivity is considered unlikely to have any significant effect on qualifying features of the Solway Firth pSPA due to the size of development proposed and distance from the Natura 2000 site.</td>
<td>- Potential for in-combination loss of land used by pSPA birds overwintering and on migration. In-combination recreational pressure on coast (60 units).</td>
<td>Y</td>
<td>SPA Bird surveys</td>
<td>Project Level HRA required</td>
</tr>
<tr>
<td>7.9km to west</td>
<td>9.2km to North West</td>
<td>7.9km to west</td>
<td>7.9km to west</td>
<td>7.9km to west</td>
<td>7.9km to west</td>
</tr>
<tr>
<td>Alliedby MCZ</td>
<td>- No direct connectivity but potential in-combination recreational pressure</td>
<td>- In-combination recreational pressure on coast considered to be less significant due to distance from site to the coast and existence of many alternative and closer areas for recreation and dog walking</td>
<td>Y</td>
<td>Provision of access to less sensitive and on-site land for alternative recreational pursuits; consider improving local footpath network and linkages from development site to these as part of development; provide alternative parking locations with easier coastal access avoiding sensitive areas.</td>
<td>None</td>
</tr>
<tr>
<td>Solway Firth pSPA</td>
<td>- Potential connectivity via the River Ellen but considered unlikely to have any significant effect due to water quality on qualifying features of the Solway Firth pSPA due to distance from the Natura 2000 site</td>
<td>- Potential for in-combination loss of land used by pSPA birds overwintering and on migration. In-combination recreational pressure on coast (100 units in 4.61 hectares).</td>
<td>Y</td>
<td>SPA bird surveys; Provision of access to less sensitive and on-site land for alternative recreational pursuits; consider improving local footpath network and linkages from development site to these as part of development; provide alternative parking locations with easier coastal access avoiding sensitive areas.</td>
<td>Project Level HRA required</td>
</tr>
<tr>
<td>Alliedby MCZ</td>
<td>- No potential wildlife corridor linkages identified apart from goose and swan functionally linked land.</td>
<td>- In-combination recreational pressure on coast</td>
<td>Y</td>
<td>Provision of access to less sensitive and on-site land for alternative recreational pursuits; consider improving local footpath network and linkages from development site to these as part of development; provide alternative parking locations with easier coastal access avoiding sensitive areas.</td>
<td>None</td>
</tr>
<tr>
<td>Solway Firth pSPA</td>
<td>- Potential connectivity via the River Ellen but considered unlikely to have any significant effect on qualifying features of the Solway Firth pSPA due to the size of development proposed (20 units in 0.83 hectares) and distance from the Natura 2000 site</td>
<td>- Potential for in-combination displacement and loss of land used by pSPA birds overwintering and on migration. In-combination recreational pressure on coast.</td>
<td>Y</td>
<td>SPA bird surveys; Only 20 units proposed. Provision of access to less sensitive and on-site land for alternative recreational pursuits; consider improving local footpath network and linkages from development site to these as part of development; provide alternative parking locations with easier coastal access avoiding sensitive areas.</td>
<td>Project Level HRA required</td>
</tr>
</tbody>
</table>

### September 2019
<table>
<thead>
<tr>
<th>ALLOCATION SITE</th>
<th>APPROX. DISTANCE FROM NATURA 2000 SITES</th>
<th>POTENTIAL EFFECTS IN ISOLATION</th>
<th>POTENTIAL FOR IN-COMBINATION EFFECTS:</th>
<th>AA</th>
<th>AVOIDANCE/MITIGATION</th>
<th>RESIDUAL EFFECTS</th>
</tr>
</thead>
<tbody>
<tr>
<td>7.9km to west</td>
<td>Allonby Bay MCZ</td>
<td>- No direct connectivity but potential in-combination recreational pressure</td>
<td>- In-combination recreational pressure on coast</td>
<td>Y</td>
<td>None</td>
<td>Only 20 units proposed. Provision of access to less sensitive and on-site land for alternative recreational pursuits; consider improving local footpath network and linkages from development site to these as part of development; provide alternative parking locations with easier coastal access avoiding sensitive areas</td>
</tr>
<tr>
<td>7.9km to west</td>
<td>Solway Firth pSPA</td>
<td>- Potential connectivity via the River Ellen but considered unlikely to have any significant effect on qualifying features of the Solway Firth pSPA due to the size of development proposed (50 units in 0.83 hectares) and distance from the Natura 2000 site.</td>
<td>- Potential for in-combination loss of land used by pSPA birds overwintering and on migration.</td>
<td>Y</td>
<td>SPA bird surveys</td>
<td>Project Level HRA required</td>
</tr>
<tr>
<td>7.9km to west</td>
<td>Allonby Bay MCZ</td>
<td>- No direct connectivity but potential in-combination recreational pressure</td>
<td>- In-combination recreational pressure on coast</td>
<td>Y</td>
<td>None</td>
<td>Only 20 units proposed. Provision of access to less sensitive and on-site land for alternative recreational pursuits; consider improving local footpath network and linkages from development site to these as part of development; provide alternative parking locations with easier coastal access avoiding sensitive areas</td>
</tr>
<tr>
<td>0.7km to West</td>
<td>Solway Firth pSPA</td>
<td>- Potential direct pathways of effect given the sites proximity to the designated site.</td>
<td>- Potential for decrease in water quality, as result of in-combination effect of multiple sites discharging into pSPA. The in-combination effect of multiple developments potentially occurring close to the Upper Solway river requires consideration at HRA stage.</td>
<td>Y</td>
<td>Project Level HRA required</td>
<td>Provided that pollution prevention measures are adopted both during and after construction, there is unlikely to be any significant effect as a result of water quality on any qualifying feature of Natura 2000 sites.</td>
</tr>
<tr>
<td>0.7km to West</td>
<td>Solway Firth SAC</td>
<td>Potential indirect pathways of effect given the sites proximity to the SAC with potential habitat connectivity between the site and the designations.</td>
<td>- Potential for decrease in water quality, as result of in-combination effect of multiple sites discharging into pSPA. The in-combination effect of multiple developments potentially occurring close to the Upper Solway river requires consideration at HRA stage.</td>
<td>Y</td>
<td>None</td>
<td>Provided that pollution prevention measures are adopted both during and after construction, there is unlikely to be any significant effect as a result of water quality on any qualifying feature of Natura 2000 sites.</td>
</tr>
<tr>
<td>1.4km to North</td>
<td>Solway Firth pSPA (including Upper Solway Flats and Marshes SPA).</td>
<td>- The site lies within the SPA Impact Risk Zone.</td>
<td>- Provided that pollution prevention measures are adopted both during and after construction, there is unlikely to be any significant effect as a result of water quality on any qualifying feature of Natura 2000 sites.</td>
<td>Y</td>
<td>None</td>
<td>Project Level HRA required</td>
</tr>
</tbody>
</table>

Allerdale Borough Council – Habitats Regulations Assessment of Local Plan Site Allocations September 2019
<table>
<thead>
<tr>
<th>ALLOCATION SITE</th>
<th>APPROX. DISTANCE FROM NATURA 2000 SITES</th>
<th>POTENTIAL EFFECTS IN ISOLATION</th>
<th>POTENTIAL FOR IN-COMBINATION EFFECTS?</th>
<th>AA</th>
<th>AVOIDANCE/MITIGATION</th>
<th>RESIDUAL EFFECTS</th>
</tr>
</thead>
<tbody>
<tr>
<td>South Solway Mosses SAC</td>
<td>2.7km to North-East</td>
<td>- There is no potential connectivity resulting in a pathway of effect to Wedholme Flow. Flow from site appears to be southwards into Speet Gill and northwards into Vizla Beck, both of which drain into the River Wampool downstream of the raised bog. Potential increase in disturbance through recreational effects of a new residential development. It is considered unlikely that this effect would be significant due to the small increase in the resident population, and the large area of potential public open space and footpaths available along the coastline.</td>
<td>- Potential increase in recreational use of coast in-combination with other coastal developments. No other likely significant in-combination effects are anticipated.</td>
<td>N</td>
<td>No likely significant effects anticipated</td>
<td>None</td>
</tr>
<tr>
<td>Solway Firth pSPA (including Upper Solway Flats and Marshes SSSI)</td>
<td>1.4km to north-west</td>
<td>- The site lies within the SPA/SSSI Impact Risk Zones for the Upper Solway Flats and Marshes SSSI and the Solway Firth pSPA which is 1.4km to the north-west. However the site is surrounded by residential housing and the nearest watercourse is Stank Beck which does not appear to have any hydrological links to the site. The site is unlikely to be used by SPA qualifying bird species due to the built up nature of the surrounding areas. Recreational effects of new residential developments here could potentially increase as a result of additional population in the area, however impacts upon designated sites are unlikely to be significant due to the large area of potential public open space and footpaths available in the wider area and along the coastline. There is some potential for an increase in dog walking on the Upper Solway Flats and Marshes which is only 1.4km to the north, resulting in disturbance to SPA and Ramsar qualifying birds, and nutrient enrichment of coastal habitats due to excrement. However, overall the increase in population is considered unlikely to be sufficient to result in significant effects on any Natura 2000 sites through recreational use.</td>
<td>- Potential in-combination effects on pSPA and Solway Firth pMCZ due to other developments along the coastal belt. Increased recreational use and low possibility of loss of functionally linked land. Site scoped out as a contributory factor due to its very small size of only 5 units and 0.58 hectares.</td>
<td>N</td>
<td>No likely significant effects anticipated</td>
<td>None</td>
</tr>
<tr>
<td>South Solway Mosses SAC</td>
<td>2.7km to North-east</td>
<td>- There is no potential connectivity resulting in a pathway of effect to Wedholme Flow. Potential increase in disturbance through recreational effects of a new residential development. It is considered unlikely that this effect would be significant due to the very small increase in the resident population, and the large area of potential public open space and footpaths available along the coastline.</td>
<td>- Potential in-combination recreational effects due to other coastal developments in Allerdale – not considered that this site will significantly add to these effects due to its very small size of 5 units and 0.58 hectares so scoped out</td>
<td>N</td>
<td>No likely significant effects anticipated</td>
<td>None</td>
</tr>
<tr>
<td>Solway Firth pMCZ</td>
<td>2.5km north</td>
<td>- No direct or indirect pathways of effect identified due to very small development on this site (5 units only)</td>
<td>- Potential in-combination recreational effects due to other coastal developments in Allerdale – not considered that this site will significantly add to these effects due to its very small size of only 5 units and 0.58 hectares so scoped out</td>
<td>N</td>
<td>No likely significant effects anticipated</td>
<td>None</td>
</tr>
<tr>
<td>Solway Firth pSPA (including Upper Solway Flats and Marshes SSSI)</td>
<td>1.4km to north-west</td>
<td>- The site lies within the SPA/SSSI Impact Risk Zones for the Upper Solway Flats and Marshes SSSI and the Solway Firth pSPA which is 1.4km to the north-west. However the site is surrounded by residential housing and the nearest watercourse is Stank Beck which does not appear to have any hydrological links to the site. The site is unlikely to be used by SPA qualifying bird species due to the built up nature of the surrounding areas. Recreational effects of new residential developments here could potentially increase as a result of additional population in the area, however impacts upon designated sites are unlikely to be significant due to the large area of potential public open space and footpaths available along the coastline.</td>
<td>- Potential in-combination effects on pSPA and Solway Firth pMCZ due to other developments along the coastal belt. Increased recreational use and low possibility of loss of functionally linked land. Scoped out due to small area of 0.6 hectares and only 15 units.</td>
<td>N</td>
<td>No likely significant effects anticipated</td>
<td>None</td>
</tr>
</tbody>
</table>
### Allerdale Borough Council – Habitats Regulations Assessment of Local Plan Site Allocations September 2019

<table>
<thead>
<tr>
<th>ALLOCATION SITE</th>
<th>APPROX. DISTANCE FROM NATURA 2000 SITES</th>
<th>POTENTIAL EFFECTS IN ISOLATION</th>
<th>POTENTIAL IN-COMBINATION EFFECTS?</th>
<th>AA</th>
<th>AVOIDANCE/MITIGATION</th>
<th>RESIDUAL EFFECTS</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.7km to north-east</td>
<td>South Solway Mosses SAC</td>
<td>- No direct or indirect pathways of effect identified due to very small development on this site (15 units only)</td>
<td>- Potential in-combination recreational effects due to other coastal developments in Allerdale – not considered that this site will add significantly to these effects due to its very small size of only 15 units and 0.6 hectares so scoped out</td>
<td>N</td>
<td>- No likely significant effects anticipated</td>
<td>None</td>
</tr>
<tr>
<td>2.5km north</td>
<td>Solway Firth SAC (including Upper Solway Rats and Marshes SPA)</td>
<td>- Residential development could result in increased in-combination recreation at the coast would could result in the disturbance of SPA qualifying species. This area is only 1.3 hectares and 25 units proposed in a small settlement more remote from other villages and towns in this catchment.</td>
<td>- Provision of access to less sensitive and on-site land for alternative recreational pursuits; consider improving local footpath network and linkages from development site to these as part of development; provide alternative parking locations with easier coastal access avoiding sensitive areas.</td>
<td>Y</td>
<td>- Provision of access to less sensitive and on-site land for alternative recreational pursuits; consider improving local footpath network and linkages from development site to these as part of development; provide alternative parking locations with easier coastal access avoiding sensitive areas.</td>
<td>Project Level HRA required</td>
</tr>
<tr>
<td>2.7km to south south west</td>
<td>River Derwent and Bassenthwaite Lake SAC</td>
<td>- No potential hydrological linkages as this site drains to the west via Furnace Gill through Flimby Great Wood to the sea north of Flimby.</td>
<td>- Potential in-combination recreational effects due to increased coastal population – limited due to size of increase.</td>
<td>Y</td>
<td>- Provision of access to less sensitive and on-site land for alternative recreational pursuits; consider improving local footpath network and linkages from development site to these as part of development; provide alternative parking locations with easier coastal access avoiding sensitive areas.</td>
<td>None</td>
</tr>
<tr>
<td>4.4km north-west</td>
<td>Allonby Bay MCZ</td>
<td>- No direct connectivity with site.</td>
<td>- Taking account of the proximity of the SAC and the number of other development sites being considered in the River Derwent catchment, the in-combination increase in population level as a result of other allocation sites has potential to affect the recreational pressure upon the designated site. Potential in-combination effects of surface water drainage on hydrology and sewage effluent on water quality when considering other developments likely to discharge to the River Derwent catchment</td>
<td>Y</td>
<td>- Provided that pollution prevention measures are adopted both during and after construction, there is unlikely to be any significant effects as a result of water quality on any qualifying feature of Natura 2000 sites.</td>
<td>None</td>
</tr>
<tr>
<td>0.4km to South</td>
<td>River Derwent and Bassenthwaite Lake SAC</td>
<td>- Potential pathways of effect indirectly via surface water and potentially groundwater drainage. Pollution prevention methodology and adoption of best practice during and after construction will result in no potential for significant effect on the River Derwent and Tributaries SAC.</td>
<td>- Potential in-combination recreational pressure with other coastal developments.</td>
<td>Y</td>
<td>- SPA bird surveys;</td>
<td>Project Level HRA required</td>
</tr>
<tr>
<td>7.6 km to west</td>
<td>Solway Firth SAC</td>
<td>- Potential connectivity via the River Derwent via surface water and groundwater drainage but considered unlikely to have any significant effect on qualifying features of the Solway Firth SAC.</td>
<td>- Potential for in-combination recreational methods to results in no potential for significant effect on the Solway Firth SAC and Ramsar qualifying birds, and nutrient enrichment of coastal habitats due to eutrophication. However, overall the increase in population is considered unlikely to be sufficient to result in significant effects on any Natura 2000 sites through recreational use.</td>
<td>Y</td>
<td>- SPA bird surveys;</td>
<td>None</td>
</tr>
</tbody>
</table>

**Policy SA23**

1/BRM/005/R 4/BRM/010/R Land to the north of Meadowlands, Broughton Moor

<table>
<thead>
<tr>
<th>Date</th>
<th>Level</th>
<th>HRA required</th>
</tr>
</thead>
<tbody>
<tr>
<td>2019</td>
<td>None</td>
<td>Project Level HRA required</td>
</tr>
</tbody>
</table>

**Policy SA24**

Roser Farm, Broughton (Great and Little)1/BRN/007/R

<table>
<thead>
<tr>
<th>Date</th>
<th>Level</th>
<th>HRA required</th>
</tr>
</thead>
<tbody>
<tr>
<td>2019</td>
<td>None</td>
<td>Project Level HRA required</td>
</tr>
</tbody>
</table>

Allerdale Borough Council
A093361-4 48

September 2019
<table>
<thead>
<tr>
<th>ALLOCATION SITE</th>
<th>APPROX. DISTANCE FROM NATURA 2000 SITE</th>
<th>POTENTIAL IN ISOLATION</th>
<th>POTENTIAL IN COMBINATION EFFECTS?</th>
<th>AA</th>
<th>AVOIDANCE/MITIGATION</th>
<th>RESIDUAL EFFECTS</th>
</tr>
</thead>
</table>
| Policy SA25 4/FLI/014/R Land to rear of Marona, Flimby | 2.5km South/South East | River Derwent and Bascouchte Lake SAC  
- Drainage from Flimby passes westwards to the coast and it is not considered likely that there is any potential for direct or indirect pathways of effect.  
- No likely significant in-combination effects are anticipated. | N | None | Project Level HRA required |
| | | Solway Firth SPA  
- Potential connectivity to the Solway Firth SPA via surface water drainage towards the sea.  
- Increase in recreationally pressure on nearby shoreline.  
- Potential use of land by SPA birds.  
- Potential for decrease in water quality, as result of in-combination effect of multiple sites discharging into SPA. The in-combination effect of multiple developments potentially occurring close to the Solway requires consideration at HRA stage.  
- Potential for in-combination recreational effects.  
- Potential in-combination effects on loss of land and displacement of SPA birds | Y | Provided that pollution prevention measures are adopted both during and after construction, there is unlikely to be any significant effect as a result of water quality on any qualifying feature of Natura 2000 sites.  
- SPA bird surveys  
- Local Plan Policies S17, S34, S35, S36, S37 | Project Level HRA required |
| Policy SA26 3/KB/015/R Land adjacent Lynholme, Kirkbride | 0.7km to west | Solway Firth SPA (incorporating Upper Solway Flats and Marshes SPA)  
- The site is situated in a sensitive area and would originally have formed part of the ‘mosses’ before land drainage and more intensive cultivation.  
- Potential changes in hydrology  
- There is potential for underlying peat to be affected leading to hydrological change in the adjacent areas and the groundwater.  
- There is some potential for the site to be used by SPA birds for feeding/roosting;  
- Taking account of the proximity of the SPA and the number of other development sites being considered along the coast or within close proximity of the coast, the increase in population level as a result of other allocation sites has potential to affect the recreational pressure upon the designated site.  
- Potential for noise and lighting disturbance to the River corridor to be increased when considered in combination with other allocations in the immediate area.  
- Potential for increase in water quality, as result of in-combination effect of multiple sites discharging into SPA. The in-combination effect of multiple developments potentially occurring close to the Upper Solway river requires consideration at HRA stage. | Y | Mitigation design to consider the potential for drying effects on adjacent local habitats associated with peat and the nearby European designated sites.  
- Assess any hydrological issues and where to discharge without impacts to the aquatic features / ecology and hydrology of the mosses and underlying peat habitat.  
- SPA bird surveys as required  
- Provided that pollution prevention measures are adopted both during and after construction, there is unlikely to be any significant effects as a result of water quality on any qualifying feature of Natura 2000 sites.  
- Pollution control required to no drainage scheme connects directly to the peat habitats  
- Provision of access to less sensitive and onsite land for alternative recreational pursuits; consider improving local footpath network and linkages from development sites to these as part of development; provide alternative parking locations with easier access to the river avoiding sensitive areas.  
- Policy SA26 indicates extent of ecology surveys required to inform the future planning application, together with opportunities for habitat retention and enhancement  
- Local Plan Policies S17, S34, S35, S36, S37 | Project Level HRA required |
| | 950m to North West | South Solway Mosses SAC  
- The site is situated in a sensitive area and would originally have formed part of the ‘mosses’ before land drainage and more intensive cultivation.  
- Potential indirect pathways of effect given the sites proximity to the SAC.  
- Potential changes in hydrology  
- No significant airborne emissions anticipated.  
- The type of development proposed will not give rise to significant airborne pollution, therefore no likely in-combination effects are anticipated to this or other blanket bog areas as a result of air emissions.  
- Potential in-combination changes in hydrology.  
- The increase in population level in-combination with other allocation sites has potential to affect the recreational pressure upon the designated site. | Y | Pollution control required so no drainage scheme connects directly to the peat habitats  
- Mitigation design to consider the potential for drying effects on adjacent local habitats associated with peat and the nearby European designated sites.  
- Assess any hydrological issues and where to discharge without impacts to the aquatic features / ecology and hydrology of the mosses and underlying peat habitat. | Project Level HRA required |
<table>
<thead>
<tr>
<th>ALLOCATION SITE</th>
<th>APPROX. DISTANCE FROM NATURA 2000 SITES</th>
<th>POTENTIAL EFFECTS IN ISOLATION</th>
<th>POTENTIAL FOR IN-COMBINATION EFFECTS?</th>
<th>AA</th>
<th>AVOIDANCE/MITIGATION</th>
<th>RESIDUAL EFFECTS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Solway Firth SAC</td>
<td>950m to North West</td>
<td>Potential indirect pathways of effect given the sites proximity to the SAC; Drainage potential into SAC affecting habitats and fish qualifying features of the site; Potential changes in hydrology,</td>
<td>Taking account of the proximity of the SAC and the number of other development sites being considered in the area, the increase in population level as a result of other allocation sites has potential to affect the recreational pressure upon the designated site. Potential for decrease in water quality, as result of in-combination effect of multiple sites discharging into SPA. The in-combination effect of multiple developments potentially occurring close to the Upper Solway river requires consideration at HRA stage.</td>
<td>Y</td>
<td>Provision of access to and on-site land for alternative recreational pursuits; consider improving local footpath network and linkages from development site to these as part of development; provide alternative parking locations with easier coastal access avoiding sensitive areas. Policy SA26 indicates extent of ecology surveys required to inform the future planning application, together with opportunities for habitat retention and enhancement. Local Plan Policies S17, S24, S34, S35, S36, S37</td>
<td></td>
</tr>
<tr>
<td>Upper Solway Flats and Marshes Ramsar</td>
<td>950m to North-West</td>
<td>There are potential waterbodies located adjacent to the site which may be used for amphibian breeding if they remain wet for long enough in the spring. European qualifying species such as natterjack toad and great crested newt are features of the other nearby designations. Although there is potential habitat for refuge and hibernation it is considered unlikely these species are present actually within the site due to the road network and lack of connectivity of suitable habitats. Potential for qualifying birds to roost and feed; The site is situated in a sensitive area and would originally have formed part of the 'messes' before land drainage and more intensive cultivation; Potential changes in hydrology affecting habitats in the vicinity; Potential water quality deterioration resulting in pollution to natterjack breeding pools.</td>
<td>Potential in-combination losses or changes in hydrology, water quality and recreational access affecting natterjack toad habitats along the coast; Taking account of the proximity of the Ramsar and the number of other development sites being considered along the coast or within close proximity of the coast, the increase in population level as a result of other allocation sites has potential to affect the recreational pressure upon the designated site.</td>
<td>Y</td>
<td>Mitigation design to consider the potential for drying effects on adjacent local habitats associated with peat and the nearby European designated sites. Assess any hydrological issues and where to discharge without impacts to the aquatic features / ecology and hydrology of the habitats. SPA bird surveys as required. Policy SA26 indicates extent of ecology surveys required to inform the future planning application, together with opportunities for habitat retention and enhancement. Local Plan Policies S17, S24, S34, S35, S36, S37</td>
<td></td>
</tr>
</tbody>
</table>

---

**Provision of access to** **less sensitive and on-site land for alternative recreational pursuits; consider improving local footpath network and linkages from development site to these as part of development; provide alternative parking locations with easier coastal access avoiding sensitive areas. Policy SA26 indicates extent of ecology surveys required to inform the future planning application, together with opportunities for habitat retention and enhancement. Local Plan Policies S17, S24, S34, S35, S36, S37**

---

**Provision of access to and on-site land for alternative recreational pursuits; consider improving local footpath network and linkages from development site to these as part of development; provide alternative parking locations with easier coastal access avoiding sensitive areas. Pollution control required so no drainage scheme connects directly to the peat habitats. Mitigation design to consider the potential for drying effects on adjacent local habitats associated with peat and the nearby European designated sites. Assess any hydrological issues and where to discharge without impacts to the aquatic features / ecology and hydrology of the habitats. SPA bird surveys as required. Policy SA26 indicates extent of ecology surveys required to inform the future planning application, together with opportunities for habitat retention and enhancement. Local Plan Policies S17, S24, S34, S35, S36, S37**
<table>
<thead>
<tr>
<th>ALLOCATION SITE</th>
<th>APPROX. DISTANCE FROM NATURA 2000 SITES</th>
<th>POTENTIAL EFFECTS IN ISOLATION</th>
<th>POTENTIAL IN-COMBINATION EFFECTS?</th>
<th>AA</th>
<th>AVOIDANCE/MITIGATION</th>
<th>RESIDUAL EFFECTS</th>
</tr>
</thead>
</table>
| Solway Firth SfPA incorporating Upper Solway Flats and Marshes SPA  
- The site is situated adjacent to Monk’s Dyke, which appears to flow northwards toward Whitrigg Marsh, thereby creating a hydrological connection from the site to the designation.  
- There is potential for underlying peat to be affected leading to hydrological change in the adjacent areas and the groundwater.  
- Potential for the site to be used by qualifying SPA birds as high tide roost or for foraging or resting during migration. | - Potential for decrease in water quality, as result of in-combination effect of multiple sites discharging into SPA. The in-combination effect of multiple developments potentially occurring close to the Upper Solway river requires consideration at HRA stage.  
- In-combination with other coastal development potential for increased recreational effect on SPA - scoped out as only 6 units proposed on 0.33 hectare.  
- Potential for the site to be used by qualifying SPA birds as high tide roost or for foraging or resting during migration. SPA bird species recorded from this general area include redshank, curlew, oystercatcher, whooper swan  
- Potential in-combination changes in hydrology. | Y | - Provided that pollution prevention measures are adopted both during and after construction, there is unlikely to be any significant effect as a result of water quality on any qualifying feature of Natura 2000 sites  
- SPA bird surveys as required  
- Assess any hydrological issues and where to discharge without impacts to the aquatic features / ecology and hydrology of the local habitats and underlying peat habitat.  
- Local Plan Policies S17, S24, S34, S35, S36, S37 | Project Level HRA required |
| South: Solway Mosses SAC  
- There is no potential connectivity resulting in a pathway of effect to Wedholme Flow. Flow from site appears to be westwards and southwards from Monks Dyke into Red Dyke and northwards into the Solway.  
- Potential increase in disturbance through recreational effects of a new residential development. It is considered unlikely that this effect would be significant due to the very small increase in the resident population (only 6 units proposed), and the large area of potential public open space and footpaths available along the coastline.  
- Provided the type of development proposed will not give rise to airborne pollution, no likely effects are anticipated to this or other blanket bog areas. | - No likely significant in-combination effects anticipated due to small increase in population arising from 6 units. | N | - No likely significant effects anticipated. | None |
| Solway Firth SAC  
Potential connectivity to the site, but it is considered unlikely to have any significant effect on qualifying features of the Solway Firth Marine Site due to the size of development proposed (6 units on 0.33 hectares). | - No likely significant in-combination effects anticipated. | N | - No likely significant effect anticipated | None |
| River Eden SAC  
The site does not drain into this catchment and no other pathways of effect have been identified. | - No likely significant in-combination effects are anticipated. | N | - No likely significant effects anticipated | None |
### Allerdale Borough Council – Habitats Regulations Assessment of Local Plan Site Allocations September 2019

#### Table 3: Potential Effects

<table>
<thead>
<tr>
<th>Allocation Site</th>
<th>Approx. Distance from Natura 2000 Sites</th>
<th>Potential Effects in Isolation</th>
<th>Potential in Combination Effects?</th>
<th>AA</th>
<th>Avoidance/Mitigation</th>
<th>Residual Effects</th>
</tr>
</thead>
</table>
| 650m to North-west | Upper Solway Flats and Marshes Ramsar  
- There are potential waterbodies located adjacent to the site which may be used for amphibian breeding if they remain wet for long enough in the spring.  
- European qualifying species such as natterjack toad and great crested newt are features of the other nearby designations. Although there is potential habitat for refuge and hibernation it is considered unlikely these species are present actually within the site due to the road network and lack of connectivity of suitable habitats.  
- Potential for qualifying birds to roost and feed;  
- The site is situated in a sensitive area and would originally have formed part of the 'mosses' before land drainage and more intensive cultivation;  
- Potential changes in hydrology affecting habitats in the vicinity;  
- Potential water quality deterioration resulting in pollution to natterjack breeding pools.  
- Potential in combination losses or changes in hydrology, water quality and recreational access affecting natterjack toad habitats along the coast;  
- Taking account of the proximity of the Ramsar and the number of other development sites being considered along the coast or within close proximity of the coast, the increase in population level as a result of other allocation sites has potential to affect the recreational pressure upon the designated site.  
- There is potential for in combination loss of habitat or disturbance to Ramsar qualifying birds; | Y | Y | Mitigation design to consider the potential for drying effects on adjacent local habitats associated with peat and the nearby European designated sites.  
- Assess any hydrological issues and where to discharge without impacts to the aquatic features / ecology and hydrology of the local habitats and underlying peat habitat.  
- Ramsar/SPA bird surveys as required  
- Provided that pollution prevention measures are adopted both during and after construction, there is unlikely to be any significant effects as a result of water quality on any qualifying feature of Natura 2000 sites.  
- Pollution control required so no drainage scheme connects directly to the peat habitats.  
- Provision of access to and on-site land for alternative recreational pursuits; consider improving local footpath network and linkages from development site to these as part of development; provide alternative parking locations with easier coastal access avoiding sensitive areas;  
- Policy SA27 indicates extent of ecology surveys required to inform the future planning application, together with opportunities for habitat retention and enhancement.  
- Local Plan Policies S17, S24, S34, S35, S36, S37 | |
| 4.2km to West | Solway Frith pSPA  
- Potential connectivity via the River Ellen but considered unlikely to have any significant effect on qualifying features of the Solway Frith pSPA due to the size of development proposed (1.1 hectare and 25 units) and distance from the Natura 2000 site  
- No likely significant in combination effects are anticipated. | N | Y | No likely significant effects anticipated | None |
| 4.2km to West | Allonby Bay MCZ  
- Potential connectivity via the River Ellen but considered unlikely to have any significant effect on qualifying features due to the size of development proposed and distance from the MCZ  
- No likely significant in combination effects anticipated | N | Y | No likely significant effects anticipated | None |
| 4.2km to East | South Solway Mosses SAC  
- no pathways likely to cause significant effect.  
- Provided the type of development proposed will not give rise to airborne pollution, no likely effects are anticipated to this or other blanket bog areas. | N | |
| 4.2km to East | River Eden SAC  
- The site does not drain into this catchment and no other pathways of effect have been identified  
- Taking account of the number of other development sites being considered in the area, the increase in population level as a result of other allocation sites has potential to affect the recreational pressure upon the designated sites. However this is considered to be insignificant as this site is not directly connected to the River Eden and there is scope for recreational pursuits in many other areas. The closest part of the River Eden SAC is the River Caldew flowing through rural areas with restricted access points. | N | |
| 9.5km to North West | No likely significant effects anticipated. | | | None |
| 4.2km to East | None | | | None |

**Note:** Project Level HRA required for Allonby Bay MCZ and South Solway Mosses SAC.
Allerdale Borough Council – Habitudes Regulations Assessment of Local Plan Site Allocations

September 2019

| ALLOCATION SITE | APPROX. DISTANCE FROM NATURA 2000 SITES | POTENTIAL EFFECTS IN ISOLATION | POTENTIAL FOR IN-COMBINATION EFFECTS? | AA | AVOIDANCE/MITIGATION | RESIDUAL EFFECTS |
|-----------------|----------------------------------------|-------------------------------|---------------------------------------|____|----------------------|-----------------|
| Solway Firth SAC, SPA and Ramsar | 9.1km to North/North West | Potential connectivity via the Natty Beck and River Wampool but considered unlikely to have any significant effect on qualifying features of the Solway Firth Marine Site due to the size of development proposed and distance from the Natura 2000 site. | - Potential for decrease in water quality, as result of in-combination effect of multiple sites discharging into SPA / Ramsar / SAC site but this site is considered to be too distant with lack of direct connectivity to give rise to significant effects even if in combination. | N | No likely significant effects anticipated. | None |
| River Derwent and Bassenthwaite Lake SAC | 1.9km South East | - No direct pathways likely to cause significant effect. Closed part of the River Derwent SAC is upstream of this site. | - No likely significant in-combination effect. | N | No likely significant effects anticipated. | None |
| Solway Firth SPA | 370m to north-east | - The site is <200m from the cliff and shoreline at Siddick and the mean high water line. It is anticipated that any development here could drain via surface water directly to the beach and therefore potentially directly into the Solway Firth pSPA. | - In-combination with other coastal developments, loss and/or disturbance of SPA birds on functionally linked land. | Y | SPA bird surveys; Additional ecology surveys as specified in Policy SA31; Local Plan Policies S17, S24, S35, S36, S37 | Project level HRA required |
| River Derwent and Bassenthwaite Lake SAC | 1.7km to South East | - There are no potential direct or indirect linkages to the SAC as no hydrological connection and the site is over 1.5km from the site. | - Potential for in-combination disturbance or loss of terrestrial habitat for otter in the Port of Workington area; | Y | Other surveys, avoidance and mitigation if required. | None |
| Solway Firth pSPA | 0.5km to the west | - The site is directly adjacent to the cliffs and shoreline at Siddick and is <500m away from the mean high water line. It is anticipated that any development here could drain via surface water directly into the adjacent beach and therefore potentially directly into the Solway Firth pSPA. | - In-combination with other coastal developments, loss and/or disturbance of SPA birds on functionally linked land. | Y | SPA bird surveys to be carried out. | Project level HRA required |

**GYPSY TRAVELLER SITES**

**EMPLOYMENT SITES**

Policy SA31
3/WOR/096/GT
Former Caravan Park, Oldside, Workington

Policy SA36
1/WOR/032/AE Land to north of Port of Workington at Oldside (part), Workington
<table>
<thead>
<tr>
<th>ALLOCATION SITE</th>
<th>APPROX. DISTANCE FROM NATURA 2000 SITES</th>
<th>POTENTIAL EFFECTS IN ISOLATION</th>
<th>POTENTIAL FOR IN-COMBINATION EFFECTS?</th>
<th>AA</th>
<th>AVOIDANCE/MITIGATION</th>
<th>RESIDUAL EFFECTS</th>
</tr>
</thead>
</table>
| Policy SA37 1/WOR/034/4 All Land to north of Port of Workington – Oldside (part) | 1.4km to South East | River Derwent and Bassenthwaite Lake SAC  
- There are potential indirect linkages to the SAC as possible hydrological connectivity. The site is separated from designated site by the A596 carriageway.  
- Qualifying features of the SAC include migratory fish (Atlantic salmon, sea lamprey and river lamprey) and otter which will also be present in the river estuary, tributaries and port areas. The site is located immediately north of part of the port. Otter are known to be present along this part of the coast and at Siddick Ponds. | - Potential for decrease in water quality, as result of in-combination effect of multiple sites discharging immediately downstream of a SAC watercourse; potential for impact on migratory fish and otter.  
- Discharge, if connected is into tidal section of river below designated section but has potential to affect passage and food supply of otter and migratory fish.  
- Taking account of the proximity of the SAC and the number of other development sites being considered in the area, the increase in daily population level adjacent to the coast as a result of other allocation sites has potential to affect the recreational pressure/disturbance level upon the designated site.  
- Potential for otter using site – in combination development of sites close to the River Derwent resulting in loss of habitat for otter, qualifying feature of the SAC. | Y | - Provided that pollution prevention measures are adopted both during and after construction, there is unlikely to be any significant effect as a result of water quality on any qualifying feature of Natura 2000 sites.  
- Loss of habitats here may adversely affect otter Lutra lutra, a species known to be present along this part of coastline and in the adjacent Port of Workington and River Derwent. This is a qualifying species of the River Derwent and Bassenthwaite Lake SAC and otter surveys will need to be carried out prior to any planning submission as they may well use terrestrial habitats in this vicinity.  
- The site has been well used for amenity and recreation in the past and is already disturbed by motorbike scrambling so additional human disturbance is unlikely to be an issue whereas loss of habitat for foraging and cover may be.  
- Policy SA37 recommends additional ecology survey work and retention of habitats and wildlife corridors.  
- Local Plan Policies S17, S24, S34, S35, S36, S37. | Project Level HRA required |
| Policy SA37 1/WOR/034/4 All Land to north of Port of Workington – Oldside (part) | 14.8km to South East | River Ethne SAC  
- No pathway of effect from this site. | - No likely significant in-combination effects are anticipated. | N | - No likely significant effects anticipated. | None |
| Policy SA38 1/WOR/046/4 Land off Jubilee Road, Lillyhall, Workington | 0.6km to the northeast | Solway Firth pSPA  
- The site is ~200m from the cliff and shoreline at Siddick and the mean high water line. It is anticipated that any development here could drain via surface water directly to the beach and therefore potentially directly into the Solway Firth pSPA.  
- There is some potential for the site to be used as functional land by designated features of the pSPA, and it also lies between Solway Firth pSPA and Siddick Ponds Nature Reserve. Siddick Pond Nature reserve has potential to be used as functional land by designated features of the pSPA and therefore consideration should be given as to whether construction and operation of the site is liable to disrupt commuting individuals. Construction and operation of the site has potential to cause disturbance of designated features of the pSPA.  
- In-combination with other coastal developments, loss of SPA bird functionally linked land.  
- Alone and in-combination effects arising for polluted surface runoff directly entering SPA. | Y | - SPA bird surveys to be carried out.  
- Provided that pollution prevention measures are adopted both during and after construction, there is unlikely to be any significant effect as a result of water quality on any qualifying feature of Natura 2000 sites.  
- Policy SA37 recommends additional ecology survey work and retention of habitats and wildlife corridors.  
- Local Plan Policies S17, S24, S34, S35, S36, S37. | Project Level HRA required |
| Policy SA38 1/WOR/046/4 Land off Jubilee Road, Lillyhall, Workington | 3.8km to North | River Derwent and Bassenthwaite Lake SAC  
- There are no direct or indirect pathways to the River Derwent SAC. | - No significant in-combination effects on River Derwent and Bassenthwaite Lake SAC site integrity are anticipated. | N | No likely significant effects anticipated. | None |
<table>
<thead>
<tr>
<th>ALLOCATION SITE</th>
<th>APPROX. DISTANCE FROM NATURA 2000 SITES</th>
<th>POTENTIAL EFFECTS IN ISOLATION</th>
<th>POTENTIAL FOR IN-COMBINATION EFFECTS?</th>
<th>AA</th>
<th>AVOIDANCE/MITIGATION</th>
<th>RESIDUAL EFFECTS?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Adjacent</td>
<td>Hen Harrier Protection Zone: - The site is situated within / immediately adjacent to Hen Harrier Protection Zone, and as such Natural England have advised it should be considered as if equivalent to SPA designation. - Potential vehicular and visual disturbance to Hen Harriers as result of proposed development. - Sites 046, 047, 048 and 049 have potential to generate in-combination effects on Hen Harrier population that overwinters in the immediate area</td>
<td>Y</td>
<td>Dedicated surveys for Hen Harrier will be required to determine potential impacts &amp; provide appropriate mitigation for any development proposed.</td>
<td>Project level HRA required</td>
<td></td>
<td></td>
</tr>
<tr>
<td>18km to South East</td>
<td>River Ehen SAC - No pathway of effect from this site.</td>
<td>- No likely significant in-combination effects are anticipated.</td>
<td>N</td>
<td>No likely significant effects anticipated.</td>
<td>None</td>
<td></td>
</tr>
<tr>
<td>3km to west</td>
<td>Solway Firth pSPA - Potential connectivity as groundwater drainage may pass to Scaur Gill and the River Wyre but no direct hydrological connections. Considered unlikely to have any significant effect on qualifying features of the Solway Firth Marine Site due to the distance from the Natura 2000 site. - Potential functionally linked land for SPA birds.</td>
<td>Y</td>
<td>SPA bird surveys. Local Plan Policies S24, S35, S36</td>
<td>Project level HRA required</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3.1km to east</td>
<td>River Derwent and Bassenthwaite Lake SAC - There are no direct or indirect pathways to the River Derwent SAC.</td>
<td>- No significant in-combination effects on River Derwent and Bassenthwaite Lake SAC site integrity are anticipated.</td>
<td>N</td>
<td>No likely significant effects anticipated.</td>
<td>None</td>
<td></td>
</tr>
<tr>
<td>Adjacent</td>
<td>Hen Harrier Protection Zone: - The site is situated within / immediately adjacent to Hen Harrier Protection Zone, and as such Natural England have advised it should be considered as if equivalent to SPA designation. - Potential vehicular disturbance to Hen Harriers as result of proposed development. - Sites 046, 047, 048 and 049 have potential to generate in-combination effects on Hen Harrier population that overwinters in the immediate area</td>
<td>Y</td>
<td>Dedicated surveys for Hen Harrier will be required to determine potential impacts &amp; provide appropriate mitigation for any development proposed.</td>
<td>Project level HRA required</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3km to west</td>
<td>Solway Firth pSPA - Potential connectivity as groundwater drainage may pass to Scaur Gill and the River Wyre but no direct hydrological connections. Considered unlikely to have any significant effect on qualifying features of the Solway Firth Marine Site due to the distance from the Natura 2000 site. - Potential functionally linked land for SPA birds.</td>
<td>Y</td>
<td>SPA bird surveys. Local Plan Policies S24, S35, S36</td>
<td>Project level HRA required</td>
<td></td>
<td></td>
</tr>
<tr>
<td>4.4km to East</td>
<td>River Derwent and Bassenthwaite Lake SAC - There are no direct or indirect pathways to the River Derwent SAC.</td>
<td>- No significant in-combination effects on River Derwent and Bassenthwaite Lake SAC site integrity are anticipated.</td>
<td>N</td>
<td>No likely significant effects anticipated.</td>
<td>None</td>
<td></td>
</tr>
<tr>
<td>Adjacent</td>
<td>Hen Harrier Protection Zone: - The site is situated within / immediately adjacent to Hen Harrier Protection Zone, and as such Natural England have advised it should be considered as if equivalent to SPA designation. - Potential vehicular disturbance to Hen Harriers as result of proposed development. - Sites 046, 047, 048 and 049 have potential to generate in-combination effects on Hen Harrier population that overwinters in the immediate area</td>
<td>Y</td>
<td>Dedicated surveys for Hen Harrier will be required to determine potential impacts &amp; provide appropriate mitigation for any development proposed.</td>
<td>Project level HRA required</td>
<td></td>
<td></td>
</tr>
<tr>
<td>14.4km to South East</td>
<td>Lake District High Fells SAC - No potential pathway of effect from this site, unless the development results in airborne emissions.</td>
<td>- Provided the type of development proposed will not give rise to significant airborne pollution, no likely in-combination effects are anticipated to this or other blanket bog areas.</td>
<td>N</td>
<td>No likely significant effects anticipated.</td>
<td>NB Project level HRA required</td>
<td></td>
</tr>
<tr>
<td>ALLOCATION SITE</td>
<td>APPROX. DISTANCE FROM NATURA 2000 SITES</td>
<td>POTENTIAL EFFECTS IN ISOLATION</td>
<td>POTENTIAL FOR IN-COMBINATION EFFECTS?</td>
<td>AA</td>
<td>AVOIDANCE/MITIGATION</td>
<td>RESIDUAL EFFECTS</td>
</tr>
<tr>
<td>-----------------</td>
<td>-----------------------------------------</td>
<td>-------------------------------</td>
<td>----------------------------------------</td>
<td>---</td>
<td>----------------------</td>
<td>------------------</td>
</tr>
<tr>
<td>Solway Firth pSPA</td>
<td>3km to west</td>
<td>Potential connectivity as groundwater drainage may pass to Scafell and the River Wyre but no direct hydrological connections. Considered unlikely to have any significant effect on qualifying features of the Solway Firth Marine Site due to the distance from the Natura 2000 site.</td>
<td>In-combination loss or disturbance to functionally linked land used by SPA birds.</td>
<td>Y</td>
<td>SPA bird surveys, Local Plan Policies S24, S35, S36, S37</td>
<td>None</td>
</tr>
<tr>
<td>Solway Firth pSPA</td>
<td>3.1km East</td>
<td>River Derwent and Bassenthwaite Lake SAC. There are no direct or indirect pathways to the River Derwent SAC.</td>
<td>No significant in-combination effects on River Derwent and Bassenthwaite Lake SAC site integrity are anticipated.</td>
<td>N</td>
<td>No likely significant effects are anticipated.</td>
<td>None</td>
</tr>
<tr>
<td>Local Plan Policies</td>
<td>11.3km to South East</td>
<td>Lake District High Fells SAC. No pathway of effect from this site unless development gives rise to significant airborne emissions.</td>
<td>Provided the type of development proposed will not give rise to airborne pollution, no likely effects are anticipated to this or other blanket bog areas.</td>
<td>N</td>
<td>No likely significant effects anticipated.</td>
<td>None</td>
</tr>
<tr>
<td>Solway Firth SAC</td>
<td>5km to South/South East</td>
<td>River Derwent and Bassenthwaite Lake SAC. No pathways likely to cause significant effect</td>
<td>No in-combination effects anticipated</td>
<td>N</td>
<td>No likely significant effects anticipated.</td>
<td>None</td>
</tr>
<tr>
<td>Solway Firth SAC</td>
<td>10.6km to North East</td>
<td>No pathways likely to cause significant effect</td>
<td>No in-combination effects anticipated</td>
<td>N</td>
<td>No likely significant effects anticipated.</td>
<td>None</td>
</tr>
<tr>
<td>Solway Firth SAC</td>
<td>13km to East</td>
<td>Local Planning site</td>
<td>No pathways likely to cause significant effect</td>
<td>N</td>
<td>No likely significant effects anticipated.</td>
<td>None</td>
</tr>
<tr>
<td>Solway Firth SAC</td>
<td>250m to west</td>
<td>Site is immediately adjacent to the coastal habitats, within biodiversity site. Potential to support qualifying SPA birds as a high tide roost or for foraging or resting during migration. It is anticipated that any development here could drain surface water to the coast and therefore potentially directly into the Solway Firth pSPA.</td>
<td>In-combination with other coastal developments, loss and/or disturbance of SPA birds on functionally linked land. Alone and in-combination effects arising for polluted surface run off directly entering SPA.</td>
<td>Y</td>
<td>SPA bird surveys; Provision of access to less sensitive and on-site land for alternative recreational pursuits; consider improving local footpath network and linkages from development site to these as part of development; provide alternative parking locations with easier coastal access avoiding sensitive areas. Provided that pollution prevention measures are adopted both during and after construction, there is unlikely to be any significant effects as a result of water quality on any qualifying feature of Natura 2000 sites.</td>
<td>None</td>
</tr>
</tbody>
</table>
## ALLOCATION SITE

- Allerdale Borough Council
- Local Plan Site Allocations
- September 2019

### Approx. Distance from Natura 2000 Sites

<table>
<thead>
<tr>
<th>ALLOCATION SITE</th>
<th>APPROX. DISTANCE FROM NATURA 2000 SITES</th>
<th>POTENTIAL EFFECTS IN ISOLATION</th>
<th>POTENTIAL FOR IN-COMBINATION EFFECTS?</th>
<th>AA</th>
<th>AVOIDANCE/MITIGATION</th>
<th>RESIDUAL EFFECTS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Allerdale (North)</td>
<td>2/COC/019/M Land Allocation Site</td>
<td>Potential for in-combination recreational pressure on coast; alone and in-combination effects arising for polluted surface runoff directly entering MCZ</td>
<td>[Y]</td>
<td></td>
<td>Any development at this location should take into consideration the following measures to mitigate potential impacts:</td>
<td>Project level HRA required</td>
</tr>
<tr>
<td>Allen Bay MCZ</td>
<td>250m to west</td>
<td>Potential increased local daytime recreational access to coast</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>River Derwent and Bassenthwaite Lake SAC</td>
<td>0.2 km North</td>
<td>A potential direct and indirect effect as designated river is approximately 240 metres to north and less than 100 metres to east, and 150metres to west.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>ALLOCATION SITE</td>
<td>APPROX. DISTANCE FROM NATURA 2000 SITES</td>
<td>POTENTIAL EFFECTS IN ISOLATION</td>
<td>POTENTIAL FOR IN-COMBINATION EFFECTS?</td>
<td>AA</td>
<td>AVOIDANCE/MITIGATION</td>
<td>RESIDUAL EFFECTS</td>
</tr>
<tr>
<td>----------------</td>
<td>-----------------------------------------</td>
<td>--------------------------------</td>
<td>--------------------------------------</td>
<td>---</td>
<td>----------------------</td>
<td>----------------</td>
</tr>
</tbody>
</table>
| Policy SA44 3/COC/025/E Land south of Low Road, Cockermouth | 0.3km to North/North East | River Derwent and Bassenthwaite Lake SAC  
- A potential direct and indirect effect as designated river is approximately 360 metres to north and 750 metres to west and 590 metres to the south east.  
- The River Derwent and Bassenthwaite Lake SAC at its closest point is 360 metres from the site. Qualifying features of the SAC include migratory fish (Atlantic salmon, sea lamprey, brook lamprey and river lamprey), watercourses of plain to montane levels with the Ranunculo fluitantis and Calathrio-Batrachion vegetation and oter. The other qualifying features are associated with Bassenthwaite Lake which is upstream of this point and are not considered likely to be significantly affected by a development here.  
- Other potential effects of the adjacent increased population and/or employment are less direct as the site has no access to the river at this point - recreational pressure on river including fishing and boating, and use of the riverside path (although there is presently no right of way shown along the south bank of the river); traffic; dog walking; accidental spillages and leakages- all considered to be insignificant due to the abundant other opportunities for recreation from this area including the coast, woodlands, network of local footpaths and the nearby Lake District National Park.  
- Potential for noise and lighting disturbance from any new employment units. | - Potential for decrease in water quality, as result of in-combination effect of multiple sites discharging into SAC site. The in-combination effect of multiple developments potentially occurring along the linear stretch of river leading into Workington requires consideration at HRA stage.  
- Taking account of the proximity of the SAC and the number of other development sites being considered in the area, the increase in population level at as result of other allocation sites has potential to affect the recreational pressure upon the designated site.  
- Potential for noise and lighting disturbance to the river corridor to be increased when considered in combination with other allocations in the immediate area. | Y | Any development at this location would need to undertake an ALE/HRA for the proposed development/uses, including the potential for effects during the construction and operational phases.  
- Provided that pollution prevention measures are adopted both during and after construction, there is unlikely to be any significant effect as a result of water quality on any qualifying feature of natura 2000 sites.  
- Provision of access to less sensitive and on-site land for alternative recreational pursuists; consider improving local footpath network and linkages from development site to these as part of development; provide alternative parking locations with easier riverside access avoiding sensitive areas. | Project Level HRA required |
| | 6.8km to North East | Ullswater SAC  
no pathways likely to cause significant effect. | - No likely significant in-combination effects are anticipated. | N | - No likely significant effects anticipated. | None |
| | 8.3km to South East | Lake District High Fells SAC  
Potential hydrological connectivity exists between the site and the SAC through the River Derwent and River Cocker. There are a series of drainage ditches that flow into the Whin Beck from the SAC. Therefore, although a hydrological link is apparent, the distance upstream from the site is over 8.7km south east. Therefore it is considered there are no pathways likely to cause significant effect. | - No likely significant in-combination effects are anticipated. | N | - No other likely significant effects anticipated. | None |
| Policy SA45 3/ASP/014/E Land at Aspatia Business Park | 6.7km to South | Ullswater SAC  
- No pathway of effect from this site. | - No likely significant in-combination effects are anticipated. | N | - No likely significant effects anticipated. | None |
| | 8.3km to North West | Solway Firth SAC  
- No direct pathways likely to cause significant effect. | - No likely significant in-combination effects are anticipated. | N | - No likely significant effects anticipated. | None |
| | 4.3km to North West | Solway Firth SAC incorporating Upper Solway Flats and Marshes SPA and Ramsar  
- No direct pathways identified.  
- Potential for the site to be used by qualifying SPA birds a high tide roost or for foraging or resting during migration unlisted; although the site is some distance inland from the coast. | - In-combination loss or disturbance to functionally linked land used by SPA birds unlisted. | Y | - SPA bird surveys;  
- Local Plan Policies S17, S24, S35, S36 | Project Level HRA may be required None |
| | 8.7km to South/South West | River Derwent and Bassenthwaite Lake SAC  
- No pathways likely to cause significant effect. | - No likely significant in-combination effects are anticipated. | N | - No likely significant effect alone or in-combination | None |
| | 10km to North East | South Solway Moss SAC  
- No pathways likely to cause significant effect. | - No likely significant in-combination effects are anticipated. | N | - No likely significant effect alone or in-combination | None |
| | 13km to South East | Lake District High Fells SAC  
- No pathways likely to cause significant effect. | - No likely significant in-combination effects are anticipated. | N | - No likely significant effect alone or in-combination | None |
| Policy SA47 3/WOR/086/S Central Car Park, Workington  | 0.8km to North East | River Derwent and Bassenthwaite Lake SAC  
- No direct pathways likely to cause significant effect, with no wildlife corridor or habitat connectively to the designated site.  
- The site is located within a residential / light industrial area of Workington, with limited vegetation. | - No likely significant in-combination effects are anticipated. | N | - No likely significant effect alone or in-combination | None |
<table>
<thead>
<tr>
<th>ALLOCATION SITE</th>
<th>APPROX. DISTANCE FROM NATURA 2000 SITES</th>
<th>POTENTIAL EFFECTS IN ISOLATION</th>
<th>POTENTIAL FOR IN-COMBINATION EFFECTS?</th>
<th>AA</th>
<th>AVOIDANCE/MITIGATION</th>
<th>RESIDUAL EFFECTS?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy SA48 4/WOR/101/5 The Royal British Legion, Workington</td>
<td>0.7km to north-east</td>
<td>River Derwent and Bassenthwaite Lake SAC - No direct pathways likely to cause significant effect, with no wildlife corridor or habitat connectivity to the designated site. - No likely significant in-combination effects anticipated.</td>
<td>N</td>
<td>No likely significant effect alone or in-combination</td>
<td>None</td>
<td></td>
</tr>
</tbody>
</table>
4.3 Summary of Stage 1 Screening of Site Allocations

The screening exercise has identified sites for which development has the potential to result in significant effects on the favourable conservation status of qualifying species and/or habitats of certain Natura 2000 sites, alone or in-combination with other proposed sites, in the absence of any mitigation. The remaining site allocations have been screened out of further assessment. These are Site Policy numbers SA11, SA14, SA21, SA22, SA28, SA29, SA47 and SA48.

The remaining Policy numbers SA8 to SA47 have been taken forward to Appropriate Assessment in Section 7.
5.0 Stage 1 Screening - Policies

5.1 Screening of Policies

Allerdale Borough Council have produced the draft Allerdale Local Plan (part 2) to include details of the individual site allocations together with related strategic Policies which steer future spatial development within the Borough. Table 3 below provides the screening assessment for these additional Policies.

Most of these policies have no potential for any likely effect on Natura 2000 sites but the following Policies have been taken forward to Appropriate Assessment in Section 7, due to potential for significant effects –

- Policy SA32 Tourism, Coastal and Countryside Recreation
- Policy SA49 Lower Derwent Valley
- Policy SA50 Wind Energy.

Policies SA52 Green Infrastructure Networks and SA53 Green Gaps, are likely to have beneficial effects on Natura 2000 sites by enhancing existing and creating new green corridors supporting and reinforcing green infrastructure throughout and beyond Allerdale.
### 5.2 Screening Matrix for Policies

#### Table 3: Screening Matrix for Policies

<table>
<thead>
<tr>
<th>POLICY</th>
<th>SUMMARY</th>
<th>POTENTIAL FOR SIGNIFICANT EFFECTS OR IN-COMBINATION EFFECTS AS A RESULT OF THIS POLICY</th>
<th>AVAIDANCE/MITIGATION</th>
<th>RESIDUAL EFFECTS</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>SITE ALLOCATIONS POLICIES</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Policy 5A1 Identified Sites</td>
<td>Protection of development sites allocated on the Policies Map in the Local Plan</td>
<td>No pathway of effect</td>
<td>N</td>
<td>N/A</td>
</tr>
<tr>
<td>Policy 5A2 Settlement Boundaries</td>
<td>Marking physical extent of settlements; proposals outside these boundaries supported if comply with other policies in the Local Plan</td>
<td>No pathway of effect; Natura 2000 sites protected at higher level by Local Plan</td>
<td>N</td>
<td>N/A</td>
</tr>
<tr>
<td>Policy 5A3 Affordable Housing</td>
<td>Provision of affordable housing</td>
<td>No pathway of effect</td>
<td>N</td>
<td>N/A</td>
</tr>
<tr>
<td>Policy 5A4 Custom and Self-Build</td>
<td>Proposals for individual custom or selfbuild houses, provided complies with other policies</td>
<td>Protected by other policies in Local Plan</td>
<td>N</td>
<td>N/A</td>
</tr>
<tr>
<td>Policy 5A5 Housing Standards</td>
<td>Meeting Building Standards</td>
<td>No pathway of effect</td>
<td>N</td>
<td>N/A</td>
</tr>
<tr>
<td>Policy 5A6 Housing Delivery</td>
<td>Provision of housing through allocated sites, site with planning permission in place, windfall sites and conversion of buildings</td>
<td>No pathway of effect</td>
<td>N</td>
<td>N/A</td>
</tr>
<tr>
<td>Policy 5A7 Supporting Housing Development</td>
<td>Additional site approval if demand exceeds supply</td>
<td>Protection of Natura 2000 sites through other Policies in Local plan</td>
<td>N</td>
<td>N/A</td>
</tr>
<tr>
<td>Policy 5A10 Gypsy, Traveller and Travelling Showpeople Sites</td>
<td>Retention of existing sites for gypsies, travellers and travelling showpeople</td>
<td>Sites already in operation - No new pathways of effect</td>
<td>N</td>
<td>N/A</td>
</tr>
<tr>
<td>Policy 5A12 Tourism, Coastal and Countryside Recreation Areas</td>
<td>This Policy indicates that new proposals for tourist facilities within or adjacent to Service Centres, and where locational need is demonstrated beyond these, will be supported. Text to protect Natura 2000, SS5Ts and other ecologically sensitive/wildlife sites included.</td>
<td>Protection afforded through Policies; site-specific assessment required as proposals likely to be located in sensitive areas. Potential for overdevelopment of sensitive areas resulting in in-combination effects.</td>
<td>Y</td>
<td>Site-specific assessments required and HRA as appropriate.</td>
</tr>
<tr>
<td>Policy 5A13 Broadband</td>
<td>Provision of adequate broadband</td>
<td>No pathway of effect</td>
<td>N</td>
<td>N/A</td>
</tr>
<tr>
<td>Policy 5A24 Employment sites</td>
<td>Stating Employment sites allocated and those with existing planning permission</td>
<td>See site allocations screening for site-specific assessment</td>
<td>N</td>
<td>N/A</td>
</tr>
<tr>
<td>Policy 5A25 Safeguarding Employment sites</td>
<td>Safeguarding of employment sites allocated and those with existing planning permission</td>
<td>No pathway of effect</td>
<td>N</td>
<td>N/A</td>
</tr>
<tr>
<td>Policy 5A49 Lower Derwent Valley</td>
<td>Proposals for enhancing and protecting the Lower Derwent Valley, and identifying opportunities along the River Derwent to protect and enhance its ecological value and flood storage capacity, improve informal recreational use, including cycle and pedestrian links to the town centre</td>
<td>Area sensitive to development. Potential for recreational effects, water quality effects, loss of riparian habitat, disturbance, noise etc.</td>
<td>Y</td>
<td>River Derwent and Bassenthwaite Lake SAC provided with protection by Policies in the overarching ABC Local Plan 2013. Buffer zone along river to afford protection to qualifying species such as otter, and prevention of polluted water discharging to the river. States in section 130 that ALSE/AA required for any potential development impacting SAC.</td>
</tr>
<tr>
<td>Policy 5A50 Wind Energy</td>
<td>Refers to a Policy map indicating areas suitable for wind energy development in Allerdale. This map indicates areas suitable for small scale windfarms and a large area suitable for all scales of windfarm. The text states that proposals located within identified sensitivity zones will be restricted to small scale turbines; then lists how the sensitivity zones have been identified to provide additional protection to the following areas – Hadrian’s Wall World Heritage Site (and its buffer zone) The Solway Coast Area of Outstanding Natural Beauty, and The Lake District National Park World Heritage Site.</td>
<td>Policy has no mention of sensitive ecological areas – Solway Firth gppa all along the coast of Allerdale; Goose and swan sensitive areas and flyways along north-west coast and inland of this in Allerdale; Hen Harrier Protection zone to the south of Allerdale; South Solway Moors SAC in the north; and the River Eden and Tributaries SAC corridor.</td>
<td>Y</td>
<td>Overarching Local Plan in Policy S19 Renewable Energy and Low Carbon Technologies contains text protecting Natura 2000 and other ecologically sensitive sites from windfarm development at strategic level. Offers overall protection but this is not clear at the Site Allocations level, with potential for Natura sites to be overlooked at least in the first stages of proposed development.</td>
</tr>
</tbody>
</table>
### POLICY SUMMARY

<table>
<thead>
<tr>
<th>Policy</th>
<th>Summary</th>
<th>Potential for Significant Effects or In-Combination Effects as a Result of This Policy</th>
<th>Avoidance/Mitigation</th>
<th>Residual Effects</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy S19 Renewable Energy and Low Carbon Technologies in the Local Plan and to other relevant plan policies.</td>
<td>Compliance with Policy S19 Renewable Energy and Low Carbon Technologies in the Local Plan and to other relevant plan policies.</td>
<td>Potential for in-combination effects due to windfarm policies and project sites in Dumfries and Galloway across the Solway Firth and in Copeland to the south. Accompanying map includes parts of the South Solway Mosses, goose and swan sensitive areas and flyways, Solway Firth SfPA and functionally linked land, and parts of River Eden and River Derwent SACs, and Hen Harrier Protection Zone within areas suitable for wind farm development of any scale. Potential for many inappropriate wind farm development proposals when using this Map without linking to the Local Plan policies.</td>
<td>Lack of regard for ecological sites in the more detailed and site-specific Site Allocations Stage 2 of the Local Plan. This runs the risk of receiving many proposals which may not be possible due to these constraints. Recommend map overlay to show the sensitive ecological sites, and mention potential risks, and add text to Policy to include ecologically sensitive sites.</td>
<td>None</td>
</tr>
<tr>
<td>Policy S51 Amenity Greenspace</td>
<td>Proposals affecting designated and undesignated greenspace to be considered against Policy S25 – will seek to protect settlement character</td>
<td>Natura 2000 sites and functionally linked land already well protected through Policies in Local Plan 2013</td>
<td>N/A</td>
<td>None</td>
</tr>
<tr>
<td>Policy S52 Green Infrastructure Networks</td>
<td>Green Infrastructure Network Map – Policies Map – to be considered at early stage of designs process for all major development proposals; All major residential, commercial and industrial developments required to strengthen this network through habitat enhancement and creation along existing green infrastructure, and to incorporate pedestrian and wildlife linkages to existing network where this lies adjacent to development sites. Refers to Allerdale Green Infrastructure Study 2011</td>
<td>Benefits green corridors and linkages between habitats supporting Natura 2000 sites and other wildlife habitats in Allerdale Provides alternative areas for informal recreation, so relieving pressure on more sensitive designated sites. Requirement for development proposals sited adjacent or within the green infrastructure network to deliver a measurable biodiversity net gain.</td>
<td>N/A</td>
<td>None, or beneficial effects</td>
</tr>
<tr>
<td>Policy S53 Green Gaps</td>
<td>Provides framework for maintaining green gaps between settlements of Kirkbampton and Thurstonfield; and Prospect and Oughterside.</td>
<td>Benefits green corridors and linkages between habitats supporting Natura 2000 sites</td>
<td>N/A</td>
<td>None, or beneficial effects</td>
</tr>
</tbody>
</table>
6.0  In-combination Assessment - Other Relevant Plans and Projects

Other relevant plans and policies, which have been considered in terms of potential in-combination effects acting together with the ABC Site Allocations on Natura 2000 sites, have been listed in the ABC Local Plan HRA 2013. This has been updated to include any revisions over the last 2 years and also includes existing Consented developments in Allerdale. The in-combination effects of developments have been assessed and are included in Table 4.

Table 4: In-combination Assessment

<table>
<thead>
<tr>
<th>Plan name</th>
<th>Location</th>
<th>Stage</th>
<th>Sustainability appraisal, SEA or HRA completed?</th>
<th>Likely in-combination effects on Natura 2000 sites and mitigation</th>
<th>Clear spatial expression</th>
<th>Comments</th>
<th>Take forward for consideration?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Regional plans</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Regional planning guidance for the North-West (RP/213)</td>
<td>Overlaps with core Strategy plan area and surroundings within 15km</td>
<td>Adopted</td>
<td>Sustainability appraisal not available from internet search</td>
<td>Appears unlikely</td>
<td>No</td>
<td>General guidance on planning issues</td>
<td>No</td>
</tr>
<tr>
<td>Regional Transport Strategy</td>
<td>Overlaps with core Strategy plan area and surroundings within 15km</td>
<td>Unclear from available information</td>
<td>Not found</td>
<td>Direct impacts unlikely</td>
<td>No</td>
<td>Not available for inspection; superseded?</td>
<td>No</td>
</tr>
<tr>
<td>Transport for the North – Strategic Transport Plan</td>
<td>Covers area on the Scottish side of the Solway Firth</td>
<td>Consultation closed (17/04/18)</td>
<td>HRA completed</td>
<td>Possible in-combination effects relating to increased tourism and access to the countryside, increased traffic effects on air pollution and in relation to resource requirements for development i.e. water extraction. Any potential infrastructure projects will be adequately assessed for likely significant impacts. Identified European sites within the NTF area and 20 km from its boundaries. This includes 31 sites in Cumbria and all the sites identified in this HRA, except Upper Solway Flats and Marshes SPA/RAMSAR and Allonby Bay MCZ.</td>
<td>Partial – area defined at this stage, but individual projects are not</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>Scotland National Planning Framework to 2025</td>
<td>Covers area on the Scottish side of the Solway Firth</td>
<td>Adopted</td>
<td>Environmental report (2004)</td>
<td>None directly identified in environmental report, although some aspects identified as having potentially negative impacts on biodiversity in general</td>
<td>No</td>
<td>General guidance and strategy with few actual projects and none near Solway Firth</td>
<td>No</td>
</tr>
<tr>
<td>Second National Planning Framework for Scotland</td>
<td>Covers area on the Scottish side of the Solway Firth</td>
<td>Issues and options</td>
<td>Strategic assessment of alternatives (2007)</td>
<td>None directly identified in environmental report, although some aspects identified as having potentially negative impacts on biodiversity in general</td>
<td>No</td>
<td>General guidance and strategy</td>
<td>No</td>
</tr>
<tr>
<td>County level plans</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Cumbria Minerals and Waste</td>
<td>Overlaps with core Strategy plan area and surroundings within 15km</td>
<td>Adopted Sept 2017</td>
<td>Not found</td>
<td>Possible, but no regional waste facilities planned for Cumbria. Local waste facility sites will be subject to HRA if required. Adds to total quantum of development in Allerdale but no likely significant in-combination effects.</td>
<td>Yes</td>
<td>Site allocations in Allerdale within 5km of Natura 2000 sites – largely for extensions to existing sand and gravel quarries. Some in catchment of River Derwent, some in Eden catchment, others drain to Solway Firth Site 11 at Moosla is within 10m of Cints Quarry SAC. Adds to additional quantum of development but not likely to result in-combination significant effects.</td>
<td>No</td>
</tr>
<tr>
<td>LDF</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Cumbria Minerals and Waste</td>
<td>Overlaps with core Strategy plan area and surroundings within 15km</td>
<td>Adopted April 2005</td>
<td>Sustainability appraisal (Land Use Consultants 2007)</td>
<td>Possible, but no regional waste facilities planned for Cumbria. Local waste facility sites will be subject to HRA if required. Adds to total quantum of development in Allerdale but no likely significant in-combination effects.</td>
<td>Yes (site allocations)</td>
<td>Site allocations include one adjacent to River Eden and one adjacent to River Derwent.</td>
<td>No</td>
</tr>
</tbody>
</table>
### Allerdale Borough Council – Habitats Regulations Assessment of Local Plan Site Allocations September 2019

<table>
<thead>
<tr>
<th>Plan name</th>
<th>Location</th>
<th>Stage</th>
<th>Sustainability appraisal, SEA or HRA completed?</th>
<th>Likely in combination effects on Natura 2000 sites and mitigation</th>
<th>Clear spatial expression</th>
<th>Comments</th>
<th>Take forward for consideration?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cumbria and Lake District Joint Structure Plan</td>
<td>Overlaps with Core Strategy plan area and surroundings within 15km</td>
<td>Adopted in 2008</td>
<td>Sustainability appraisal (2003)</td>
<td>Possible in-combination effects relating to increased tourism and access to the countryside – already adequately covered in Allerdale Local Plan in Policy S17</td>
<td>Yes, but not detailed</td>
<td>In general, policies identified as having potentially negative impacts on ecology do not relate to European sites in any way. Provides for development on the coast etc. which could affect Solway Firth</td>
<td>Yes, when considering the Solway Firth pSPA, Upper Solway Flats and Marshes Ramsar, and Allonby Bay MCZ – discussed in Chapter 7.</td>
</tr>
<tr>
<td>Cumbria Local Transport Plan 2011-2026</td>
<td>Overlaps with Core Strategy plan area and surroundings within 15km</td>
<td>Adopted</td>
<td>SEA (Capita Symonds, 2005)</td>
<td>Unlikely, supports upgrading of the A595, A5090, A590 and A66. Promotes sustainable transport, increased bus services to rural areas, improved rail services. Increased traffic and subsequent air pollution effects – in-combination air quality aspects to be addressed in Allerdale Local Plan HRA at site allocations stage</td>
<td>No</td>
<td>Few ecological impacts identified by SEA. No. In-combination aspects resulting in air pollution to be addressed at site allocations stage</td>
<td></td>
</tr>
<tr>
<td>Cumbria Joint Wind Energy SPD</td>
<td>Overlaps with Core Strategy plan area and surroundings within 15km</td>
<td>Adopted in 2007</td>
<td>Sustainability appraisal 2006</td>
<td>Possible in-combination impacts in particular along the Solway Firth coastal plain where SPA birds are a concern.</td>
<td>No</td>
<td>Guidance relates to minimising landscape and visual impacts of wind energy projects.</td>
<td>Yes</td>
</tr>
<tr>
<td>Dumfries and Galloway Structure Plan</td>
<td>Covers area on the Scottish side of the Solway Firth</td>
<td>Adopted 2008</td>
<td>None found</td>
<td>Possible but unlikely at present as Dumfries and Galloway Local Plan avoids the coastal plain for promotion of renewable. Included in assessment on precautionary basis when discussing wind farms in Chapter 7</td>
<td>Partial</td>
<td>Allocation of 165 housing units for coastal plan alongside Solway Firth, plus statement that land required for employment in general area. However, policy 64 clearly states protection for Natura 2000 sites. Wind farm aspects – discussed in Section 7.</td>
<td></td>
</tr>
<tr>
<td>Cumbria Coastal Strategy Shoreline Management Plan</td>
<td>Cumbrian Coast – from Monzievare Bay to Solway Firth</td>
<td>Currently at draft options assessment stage</td>
<td>SEA Scoping Report produced May 2018</td>
<td>Possible in-combination effects throughout the area of landscape disturbance associated with new coastal defence projects</td>
<td>Partial – individual projects not documented</td>
<td>Priorit units located along Allerdale coast, however individual projects not yet defined. Possible impacts on Solway Firth pSPA, Solway Flats and Marshes SPA and SAC and Allonby Bay MCZ</td>
<td>Yes, with respect to coastal site allocations or those with the potential to affect coastal Natura 2000 sites.</td>
</tr>
</tbody>
</table>

### Allerdale plans

<table>
<thead>
<tr>
<th>Plan name</th>
<th>Location</th>
<th>Stage</th>
<th>Sustainability appraisal, SEA or HRA completed?</th>
<th>Likely in combination effects on Natura 2000 sites and mitigation</th>
<th>Clear spatial expression</th>
<th>Comments</th>
<th>Take forward for consideration?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Allerdale Local Plan</td>
<td>Boundaries same as Core Strategy plan area</td>
<td>Adopted 1999, expired March 2006 but saved policies still in use until LDF is completed</td>
<td>None found</td>
<td>Possible, if allocations not already implemented</td>
<td>Yes</td>
<td>Saved policies include housing allocations and policy relating to Silloth Docks. A few allocations in Silloth adjacent to Solway Firth, plus in Cockermouth and Workington by River Derwent</td>
<td>Yes, but only until Local Plan is adopted</td>
</tr>
<tr>
<td>Allerdale LDF documents other than the Core Strategy</td>
<td>Boundaries same as Core Strategy plan area</td>
<td>LDF 2011 – 2026 cut for consultation 2012 - 2013</td>
<td>Not yet</td>
<td>Possible, but no details available</td>
<td>Yes, when complete</td>
<td>Subsidiary documents to Core Strategy</td>
<td>No</td>
</tr>
</tbody>
</table>

### Other borough level plans

<table>
<thead>
<tr>
<th>Plan name</th>
<th>Location</th>
<th>Stage</th>
<th>Sustainability appraisal, SEA or HRA completed?</th>
<th>Likely in combination effects on Natura 2000 sites and mitigation</th>
<th>Clear spatial expression</th>
<th>Comments</th>
<th>Take forward for consideration?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Annandale and Eskdale Local Plan</td>
<td>Covers area on the Scottish side of the Solway Firth</td>
<td>Adopted 2006</td>
<td>None found</td>
<td>Unlikely but possible with regards windfarm developments on the Solway Firth.</td>
<td>Yes</td>
<td>Various allocations in coastal area alongside Solway Firth</td>
<td>Yes, with respect to windfarms only</td>
</tr>
<tr>
<td>Copeland Local Plan 2001 - 2016</td>
<td>Adjacent to Plan area</td>
<td>Adopted 2006</td>
<td>None found</td>
<td>Unlikely</td>
<td>Yes</td>
<td>There appear to be no Natura 2000 sites in the Copeland plan area within 15km of Allerdale plan boundary, and it is in a different catchment to all Natura 2000 sites identified for consideration.</td>
<td>No.</td>
</tr>
<tr>
<td>Plan name</td>
<td>Location</td>
<td>Stage</td>
<td>Sustainability appraisal, SEA or HRA completed?</td>
<td>Likely in combination effects on Natura 2000 sites and mitigation</td>
<td>Clear spatial expression</td>
<td>Comments</td>
<td>Takes forward for consideration?</td>
</tr>
<tr>
<td>-------------------</td>
<td>-----------------------------------</td>
<td>-----------</td>
<td>-----------------------------------------------</td>
<td>------------------------------------------------------------------</td>
<td>--------------------------</td>
<td>--------------------------------------------------------------------------</td>
<td>----------------------------------</td>
</tr>
<tr>
<td>Copeland LDF</td>
<td>Adjacent to Plan area</td>
<td>Adopted</td>
<td>No</td>
<td>Unlikely</td>
<td>Yes, when finished</td>
<td>See above In-combination issues with renewable energy in particular wind farms along the coast. In-combination aspects of increased traffic along roads resulting in air pollution effects will be addressed at site allocations stage as not sufficient detail at this strategic level</td>
<td>Yes, with respect renewable development (wind farms) along coast</td>
</tr>
<tr>
<td>Lake District National Park Local Plan</td>
<td>Contains Natura 2000 sites within 15km of Allerdale plan boundary</td>
<td>Adopted</td>
<td>None found</td>
<td>Possible</td>
<td>Yes</td>
<td>Unlikely from proposals map, but appears that there are no allocations anywhere near the relevant Natura 2000 sites. In-combination effects due to increased tourism and traffic</td>
<td>Yes, with regards increased traffic and air pollution effects due to visitor/tourism development - addressed in Section 7 Appropriate Assessment</td>
</tr>
<tr>
<td>Lake District National Park LDF</td>
<td>Contains Natura 2000 sites within 15km of Allerdale plan boundary</td>
<td>In preparation</td>
<td>None found</td>
<td>Possible</td>
<td>Yes</td>
<td>Site Allocations HRA has been submitted. In-combination effects due to increased tourism and traffic</td>
<td>Yes, with regards increased traffic and air pollution effects due to visitor/tourism development</td>
</tr>
</tbody>
</table>

### Development Projects

<table>
<thead>
<tr>
<th>Plan name</th>
<th>Location</th>
<th>Stage</th>
<th>Sustainability appraisal, SEA or HRA completed?</th>
<th>Likely in combination effects on Natura 2000 sites and mitigation</th>
<th>Clear spatial expression</th>
<th>Comments</th>
<th>Takes forward for consideration?</th>
</tr>
</thead>
<tbody>
<tr>
<td>2/2013/0478</td>
<td>Allonby</td>
<td>Approved</td>
<td>No</td>
<td>No</td>
<td>Yes</td>
<td>Possible in combination effects with other developments in the Maryport area, in terms of increased visitor pressure on and decreased water quality within Solway Firth pSPPA and Allonby Bay MCZ</td>
<td>Yes in relation to Solway Firth pSPPA and Allonby Bay MCZ</td>
</tr>
<tr>
<td>2/2012/0467</td>
<td>Aspatria</td>
<td>Approved</td>
<td>No</td>
<td>No</td>
<td>Yes</td>
<td>Small development on Agricultural land.</td>
<td>No</td>
</tr>
<tr>
<td>2/2012/0902</td>
<td>Bothel</td>
<td>Approved</td>
<td>No – ecological desk study and appraisal completed</td>
<td>No</td>
<td>Yes</td>
<td>Ubdist Natura 2000 site is Bibbico Quarry Moors SAC, notified for great crested newt, but no hydrological connections.</td>
<td>No</td>
</tr>
<tr>
<td>2/2012/0994</td>
<td>Brigham</td>
<td>Approved</td>
<td>No – ecological desk study and appraisal completed</td>
<td>Possible</td>
<td>Yes</td>
<td>Site located 300 m from River Derwent SAC. Scope for in-combination deterioration in water quality</td>
<td>Yes – when considering River Derwent and Bassenthwaite Lake SAC</td>
</tr>
<tr>
<td>2/2013/0350</td>
<td>Broughton Moor</td>
<td>Approved</td>
<td>No – ecological desk study and appraisal completed</td>
<td>Possible</td>
<td>Yes</td>
<td>Site located 900 m from River Derwent SAC. Scope for in-combination deterioration in water quality</td>
<td>Yes – when considering River Derwent and Bassenthwaite Lake SAC</td>
</tr>
<tr>
<td>2/2014/0884</td>
<td>Broughton Moor</td>
<td>Approved</td>
<td>No – ecological desk study and appraisal completed</td>
<td>No</td>
<td>Yes</td>
<td>No Natura 2000 sites within 2 km</td>
<td>No</td>
</tr>
<tr>
<td>2/2014/0886</td>
<td>Broughton Moor</td>
<td>Approved</td>
<td>Yes – AL3E completed</td>
<td>Possible</td>
<td>Yes</td>
<td>River Derwent and Bassenthwaite Lake SAC within 1.4 km of site SUDS scheme proposed. Scope for in-combination deterioration in water quality</td>
<td>Yes, in relation to River Derwent and Bassenthwaite Lake SAC</td>
</tr>
<tr>
<td>Plan name</td>
<td>Location</td>
<td>Stage</td>
<td>Sustainability appraisal, SEA or HRA completed?</td>
<td>Likely in combination effects on Natura 2000 sites and mitigation</td>
<td>Clear spatial expression</td>
<td>Comments</td>
<td>Take forward for consideration?</td>
</tr>
<tr>
<td>-----------</td>
<td>----------</td>
<td>-------</td>
<td>-------------------------------------------------</td>
<td>-------------------------------------------------</td>
<td>--------------------------</td>
<td>----------</td>
<td>-------------------------------</td>
</tr>
<tr>
<td>2/2014/0361</td>
<td>Cockermouth</td>
<td>Approved</td>
<td>Yes – ALSF completed</td>
<td>Possible</td>
<td>Yes</td>
<td>Connectivity to River Derwent and Bassenthwaite Lake SAC via Tom Rudd Beck. Scope for in-combination deterioration in water quality</td>
<td>Yes, in relation to River Derwent and Bassenthwaite Lake SAC</td>
</tr>
<tr>
<td>2/2014/0592</td>
<td>Cockermouth</td>
<td>Appeal Allowed</td>
<td>Yes – ALSF completed</td>
<td>Possible</td>
<td>Yes</td>
<td>Site lies 30 m from River Derwent and Bassenthwaite Lake SAC. Scope for in-combination deterioration in water quality</td>
<td>Yes, in relation to River Derwent and Bassenthwaite Lake SAC</td>
</tr>
<tr>
<td>2/2014/0880</td>
<td>Cockermouth</td>
<td>Approved</td>
<td>Yes – ALSF completed</td>
<td>Possible</td>
<td>Yes</td>
<td>Site lies 30 m from River Derwent and Bassenthwaite Lake SAC. Scope for in-combination deterioration in water quality</td>
<td>Yes, in relation to River Derwent and Bassenthwaite Lake SAC</td>
</tr>
<tr>
<td>2/2013/0468</td>
<td>Dearham</td>
<td>Approved</td>
<td>No</td>
<td>No</td>
<td>Yes</td>
<td>Possible in combination effects with other developments in the Maryport area, in terms of increased visitor pressure on and potentially decreased water quality within Solway Firth pSPA and Allonby Bay MCZ</td>
<td>Yes, in relation to Solway Firth pSPA and Allonby Bay MCZ</td>
</tr>
<tr>
<td>2/2013/0142</td>
<td>Kirkbride</td>
<td>Approved</td>
<td>No</td>
<td>No</td>
<td>Yes</td>
<td>Possible in combination effects with other developments in the Maryport area, in terms of increased visitor pressure on and potentially decreased water quality within Solway Firth pSPA and Allonby Bay MCZ</td>
<td>Yes, in relation to Solway Firth pSPA and Allonby Bay MCZ</td>
</tr>
<tr>
<td>2/2013/0275</td>
<td>Kirkbride</td>
<td>Approved</td>
<td>No</td>
<td>No</td>
<td>Yes</td>
<td>Possible in combination effects with other developments in the Maryport area, in terms of increased visitor pressure on and potentially decreased water quality within Solway Firth pSPA and Allonby Bay MCZ</td>
<td>Yes, in relation to Solway Firth pSPA and Allonby Bay MCZ</td>
</tr>
<tr>
<td>2/2013/0564</td>
<td>Kirkbride</td>
<td>Approved</td>
<td>No</td>
<td>No</td>
<td>Yes</td>
<td>Possible in combination effects with other developments in the Maryport area, in terms of increased visitor pressure on and potentially decreased water quality within Solway Firth pSPA and Allonby Bay MCZ</td>
<td>Yes, in relation to Solway Firth pSPA and Allonby Bay MCZ</td>
</tr>
<tr>
<td>2/2010/0361</td>
<td>Kirkbride</td>
<td>Approved</td>
<td>No</td>
<td>No</td>
<td>Yes</td>
<td>Possible in combination effects with other developments in the Maryport area, in terms of increased visitor pressure on and potentially decreased water quality within Solway Firth pSPA and Allonby Bay MCZ</td>
<td>Yes, in relation to Solway Firth pSPA and Allonby Bay MCZ</td>
</tr>
</tbody>
</table>

**Notes:**
- **ALSF** stands for Allerdale Local Spatial Framework.
- **SEA** stands for Strategic Environmental Assessment.
- **HRA** stands for Habitats Regulations Assessment.
- **Natura 2000** is a network of sites across Europe designated for the conservation of biodiversity.
- **pSPA** stands for protected Special Protection Area.
- **MCZ** stands for Marine Conservation Zone.
<table>
<thead>
<tr>
<th>Plan name</th>
<th>Location</th>
<th>Stage</th>
<th>Sustainability appraisal, SEA or HRA completed?</th>
<th>Likely in combination effects on Natura 2000 sites and mitigation</th>
<th>Clear spatial expression</th>
<th>Comments</th>
<th>Take forward for consideration?</th>
</tr>
</thead>
<tbody>
<tr>
<td>2/2013/0729 Application to replace extent approval 2/2008/0937 for the erection of 12 No. new detached and semi-detached dwellings, including 2 No. affordable dwellings, together with associated works, i.e. garages, roads, sewers, etc, and demolition of existing buildings on site.</td>
<td>Kirkbride</td>
<td>Approved</td>
<td>No</td>
<td>Possible</td>
<td>Yes</td>
<td>Possible in combination effects with other developments in terms of deterioration of water quality within and increased visitor pressure on Natura 2000 Sites around Solway Firth.</td>
<td>Yes, in relation to Upper Solway Flats and Marshes SPA, Solway Firth SAC, Solway Firth pSSPA and South Solway Mosses pSSPA</td>
</tr>
<tr>
<td>2/2013/0882 Development of 152 residential units with associated infrastructure (including shared link to proposed Roman Maryport Museum site)</td>
<td>Maryport</td>
<td>Approved</td>
<td>No</td>
<td>Possible</td>
<td>Yes</td>
<td>Possible in combination effects with other developments in terms of increased visitor pressure on and potentially decreased water quality within Solway Firth pSSPA and Allonby Bay MCZ</td>
<td>Yes, in relation to Solway Firth pSSPA and Allonby Bay MCZ</td>
</tr>
<tr>
<td>2/2015/0218 Hybrid planning application including: Full planning application for the partial demolition and conversion of Ewanrigg Hall (Grade II Listed) to create 2no dwellings and extension to provide 4no dwellings (Use Class C3), and demolition of associated outbuildings; and Outline planning application for the development of approximately 124 dwellings (Use Class C3), with all matters reserved except for means of access.</td>
<td>Maryport</td>
<td>Approved</td>
<td>No</td>
<td>Possible</td>
<td>Yes</td>
<td>Possible in combination effects with other developments in the Maryport area, in terms of increased visitor pressure on and potentially decreased water quality within Solway Firth pSSPA and Allonby Bay MCZ</td>
<td>Yes, in relation to Solway Firth pSSPA and Allonby Bay MCZ</td>
</tr>
<tr>
<td>2/2014/0565 Outline application for the erection of 9no. detached dwellings.</td>
<td>Maryport</td>
<td>Approved</td>
<td>No</td>
<td>Possible</td>
<td>Yes</td>
<td>Possible in combination effects with other developments in the Maryport area, in terms of increased visitor pressure on and potentially decreased water quality within Solway Firth pSSPA and Allonby Bay MCZ</td>
<td>Yes, in relation to Solway Firth pSSPA and Allonby Bay MCZ</td>
</tr>
<tr>
<td>2/2012/0809 Proposed new housing development of 8 dwellings</td>
<td>Maryport</td>
<td>Approved</td>
<td>No</td>
<td>Possible</td>
<td>Yes</td>
<td>Possible in combination effects with other developments in the Maryport area, in terms of increased visitor pressure on and potentially decreased water quality within Solway Firth pSSPA and Allonby Bay MCZ</td>
<td>Yes, in relation to Solway Firth pSSPA and Allonby Bay MCZ</td>
</tr>
<tr>
<td>2/2014/0590 Outline application for proposed residential development of up to 25no. dwellings</td>
<td>Prospect</td>
<td>Approved</td>
<td>No</td>
<td>Possible</td>
<td>Yes</td>
<td>Possible in combination effects with other developments in the Maryport area, in terms of increased visitor pressure on and potentially decreased water quality within Solway Firth pSSPA and Allonby Bay MCZ</td>
<td>Yes, in relation to Solway Firth pSSPA and Allonby Bay MCZ</td>
</tr>
<tr>
<td>2/2015/0505 Demolition of commercial buildings and residential development of up to 20 dwellings - Re-submission of application 2/2016/0059</td>
<td>Prospect</td>
<td>Approved</td>
<td>No</td>
<td>Possible</td>
<td>Yes</td>
<td>Possible in combination effects with other developments in the Maryport area, in terms of increased visitor pressure on and potentially decreased water quality within Solway Firth pSSPA and Allonby Bay MCZ</td>
<td>Yes, in relation to Solway Firth pSSPA and Allonby Bay MCZ</td>
</tr>
<tr>
<td>Plan name</td>
<td>Location</td>
<td>Stage</td>
<td>Sustainability appraisal, SEA or HRA completed?</td>
<td>Likely in combination effects on Natura 2000 sites and mitigation</td>
<td>Clear spatial expression</td>
<td>Comments</td>
<td>Take forward for consideration?</td>
</tr>
<tr>
<td>-----------</td>
<td>----------</td>
<td>-------</td>
<td>-----------------------------------------------</td>
<td>---------------------------------------------------------------</td>
<td>-------------------------</td>
<td>----------</td>
<td>---------------------------------</td>
</tr>
<tr>
<td>2010/0207</td>
<td>Wigton</td>
<td>Approved</td>
<td>No</td>
<td>Possible in combination effects with other developments in terms of deterioration of water quality within and increased visitor pressure on Natura 2000 Sites around Solway Firth.</td>
<td>Yes</td>
<td>Yes in relation to Upper Solway Flats and Marshes SPA, Solway Firth SAC, Solway Firth pSPA and South Solway Moors pSPA</td>
<td></td>
</tr>
<tr>
<td>2014/0405</td>
<td>Wigton</td>
<td>Approved</td>
<td>No</td>
<td>Possible in combination effects with other developments in terms of deterioration of water quality within and increased visitor pressure on Natura 2000 Sites around Solway Firth.</td>
<td>Yes</td>
<td>Yes in relation to Upper Solway Flats and Marshes SPA, Solway Firth SAC, Solway Firth pSPA and South Solway Moors pSPA</td>
<td></td>
</tr>
<tr>
<td>2014/0406</td>
<td>Wigton</td>
<td>Approved</td>
<td>No</td>
<td>Possible in combination effects with other developments in terms of deterioration of water quality within and increased visitor pressure on Natura 2000 Sites around Solway Firth.</td>
<td>Yes</td>
<td>Yes in relation to Upper Solway Flats and Marshes SPA, Solway Firth SAC, Solway Firth pSPA and South Solway Moors pSPA</td>
<td></td>
</tr>
<tr>
<td>2016/0076</td>
<td>Wigton</td>
<td>Approved</td>
<td>No</td>
<td>Small site, but possible in combination effects with other developments in terms of deterioration of water quality within and increased visitor pressure on Natura 2000 Sites around Solway Firth.</td>
<td>Yes</td>
<td>Yes in relation to Upper Solway Flats and Marshes SPA, Solway Firth SAC, Solway Firth pSPA and South Solway Moors pSPA</td>
<td></td>
</tr>
<tr>
<td>2016/0077</td>
<td>Wigton</td>
<td>Approved</td>
<td>No</td>
<td>Possible in combination effects with other developments in terms of deterioration of water quality within and increased visitor pressure on Natura 2000 Sites around Solway Firth.</td>
<td>Yes</td>
<td>Yes in relation to Upper Solway Flats and Marshes SPA, Solway Firth SAC, Solway Firth pSPA and South Solway Moors pSPA</td>
<td></td>
</tr>
<tr>
<td>2016/0078</td>
<td>Wigton</td>
<td>Approved</td>
<td>No</td>
<td>Possible in combination effects with other developments in terms of deterioration of water quality within and increased visitor pressure on Natura 2000 Sites around Solway Firth.</td>
<td>Yes</td>
<td>Yes in relation to Upper Solway Flats and Marshes SPA, Solway Firth SAC, Solway Firth pSPA and South Solway Moors pSPA</td>
<td></td>
</tr>
<tr>
<td>2016/0079</td>
<td>Wigton</td>
<td>Approved</td>
<td>No</td>
<td>Possible in combination effects with other developments in terms of deterioration of water quality within and increased visitor pressure on Natura 2000 Sites around Solway Firth.</td>
<td>Yes</td>
<td>Yes in relation to Upper Solway Flats and Marshes SPA, Solway Firth SAC, Solway Firth pSPA and South Solway Moors pSPA</td>
<td></td>
</tr>
<tr>
<td>2016/0080</td>
<td>Wigton</td>
<td>Approved</td>
<td>No</td>
<td>Possible in combination effects with other developments in terms of deterioration of water quality within and increased visitor pressure on Natura 2000 Sites around Solway Firth.</td>
<td>Yes</td>
<td>Yes in relation to Upper Solway Flats and Marshes SPA, Solway Firth SAC, Solway Firth pSPA and South Solway Moors pSPA</td>
<td></td>
</tr>
<tr>
<td>2016/0081</td>
<td>Wigton</td>
<td>Approved</td>
<td>No</td>
<td>Possible in combination effects with other developments in terms of deterioration of water quality within and increased visitor pressure on Natura 2000 Sites around Solway Firth.</td>
<td>Yes</td>
<td>Yes in relation to Upper Solway Flats and Marshes SPA, Solway Firth SAC, Solway Firth pSPA and South Solway Moors pSPA</td>
<td></td>
</tr>
<tr>
<td>2017/0564</td>
<td>Wigton</td>
<td>Approved</td>
<td>No</td>
<td>Possible in combination effects with other developments in terms of deterioration of water quality within and increased visitor pressure on Natura 2000 Sites around Solway Firth.</td>
<td>Yes</td>
<td>Yes in relation to Upper Solway Flats and Marshes SPA, Solway Firth SAC, Solway Firth pSPA and South Solway Moors pSPA</td>
<td></td>
</tr>
<tr>
<td>2017/0565</td>
<td>Wigton</td>
<td>Approved</td>
<td>No</td>
<td>Possible in combination effects with other developments in terms of deterioration of water quality within and increased visitor pressure on Natura 2000 Sites around Solway Firth.</td>
<td>Yes</td>
<td>Yes in relation to Upper Solway Flats and Marshes SPA, Solway Firth SAC, Solway Firth pSPA and South Solway Moors pSPA</td>
<td></td>
</tr>
<tr>
<td>2017/0566</td>
<td>Wigton</td>
<td>Approved</td>
<td>Not as part of this application</td>
<td>Possible in combination effects with other developments in terms of deterioration of water quality within and increased visitor pressure on Solway Firth pSPA and functionally linked land.</td>
<td>Yes</td>
<td>Yes in relation to Solway Firth pSPA</td>
<td></td>
</tr>
<tr>
<td>Plan name</td>
<td>Location</td>
<td>Stage</td>
<td>Sustainability appraisal, SEA or HRA completed?</td>
<td>Likely in combination effects on Natura 2000 sites and mitigation</td>
<td>Clear spatial expression</td>
<td>Comments</td>
<td>Take forward for consideration?</td>
</tr>
<tr>
<td>-----------</td>
<td>----------</td>
<td>-------</td>
<td>-------------------------------------------------</td>
<td>---------------------------------------------------------------</td>
<td>--------------------------</td>
<td>----------</td>
<td>---------------------------------</td>
</tr>
<tr>
<td>2/2014/006</td>
<td>Workington</td>
<td>Approved</td>
<td>No</td>
<td>Possible</td>
<td>Yes</td>
<td>Possible in combination effects with other developments in terms deterioration of water quality within and increased visitor pressure on Solway Firth pSPA and functionally linked land.</td>
<td>Yes, in relation to Solway Firth pSPA</td>
</tr>
<tr>
<td>2/2015/0056</td>
<td>Workington</td>
<td>Approved</td>
<td>No</td>
<td>Possible</td>
<td>Yes</td>
<td>Possible in combination effects with other developments in terms deterioration of water quality within and increased visitor pressure on Solway Firth pSPA and functionally linked land.</td>
<td>Yes, in relation to Solway Firth pSPA</td>
</tr>
<tr>
<td>2/2015/0036</td>
<td>Workington</td>
<td>Approved</td>
<td>No</td>
<td>Possible</td>
<td>Yes</td>
<td>Possible in combination effects with other developments in terms deterioration of water quality within and increased visitor pressure on Solway Firth pSPA and functionally linked land.</td>
<td>Yes, in relation to Solway Firth pSPA</td>
</tr>
<tr>
<td>2/2014/0057</td>
<td>Workington</td>
<td>Approved</td>
<td>No</td>
<td>Possible</td>
<td>Yes</td>
<td>Possible in combination effects with other developments in terms deterioration of water quality within and increased visitor pressure on Solway Firth pSPA and functionally linked land.</td>
<td>Yes, in relation to Solway Firth pSPA</td>
</tr>
<tr>
<td>2/2012/0043</td>
<td>Workington</td>
<td>Approved</td>
<td>No</td>
<td>Possible</td>
<td>Yes</td>
<td>Possible in combination effects with other developments in terms deterioration of water quality within and increased visitor pressure on Solway Firth pSPA and functionally linked land.</td>
<td>Yes, in relation to Solway Firth pSPA</td>
</tr>
<tr>
<td>2/2013/0044</td>
<td>Workington</td>
<td>Withdrawn</td>
<td>No</td>
<td>No</td>
<td>Yes</td>
<td>Small development</td>
<td>No</td>
</tr>
<tr>
<td>2/2015/0007</td>
<td>Workington</td>
<td>Approved</td>
<td>No</td>
<td>Possible</td>
<td>Yes</td>
<td>Possible in combination effects with other developments in terms deterioration of water quality within and increased visitor pressure on Solway Firth pSPA and functionally linked land.</td>
<td>Yes, in relation to Solway Firth pSPA</td>
</tr>
<tr>
<td>2/2017/0011</td>
<td>Workington</td>
<td>Approved</td>
<td>No</td>
<td>Possible</td>
<td>Yes</td>
<td>Possible in combination effects with other developments in terms deterioration of water quality within and increased visitor pressure on Solway Firth pSPA and functionally linked land.</td>
<td>Yes, in relation to Solway Firth pSPA</td>
</tr>
</tbody>
</table>

### Plans not directly related to development control

<table>
<thead>
<tr>
<th>Plan name</th>
<th>Location</th>
<th>Stage</th>
<th>Sustainability appraisal, SEA or HRA completed?</th>
<th>Likely in combination effects on Natura 2000 sites and mitigation</th>
<th>Clear spatial expression</th>
<th>Comments</th>
<th>Take forward for consideration?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Derwent Head to River Solway Shoreline Management Plan (Allerdale Borough Council)</td>
<td>Unspecified</td>
<td>Completed 1996</td>
<td>None found</td>
<td>Possible</td>
<td>Yes</td>
<td>Preferred option for Solway Firth area is to hold the line. Plan sets out schedule for maintenance of sea defences, etc but nothing further.</td>
<td>No</td>
</tr>
<tr>
<td>Derwent, West Cumbria and Eden Catchment Abstraction Management Strategy (Environment Agency)</td>
<td>Includes part of plan area and area within 15km</td>
<td>Completed 2007</td>
<td>None found</td>
<td>Unlikely given framework of abstraction licensing which is in place.</td>
<td>No</td>
<td>Clear policy relating to HRA review of consents of existing abstraction licences and HRA of future applications for licences, net effect is to protect sites.</td>
<td>Yes. Abstraction and supply issues considered in Section 7.5.</td>
</tr>
<tr>
<td>Eden &amp; Solway Catchment Abstraction Management Strategy (Environment Agency)</td>
<td>Includes part of plan area and area within 15km</td>
<td>Completed 2006</td>
<td>None found</td>
<td>Unlikely given framework of abstraction licensing which is in place.</td>
<td>No</td>
<td>Clear policy relating to HRA review of consents of existing abstraction licences and HRA of future applications for licences, net effect is to protect sites. No provision for future Allerdale water supply.</td>
<td>No</td>
</tr>
<tr>
<td>Derwent Catchment Flood Management Plan</td>
<td>Includes part of plan area and area within 15km</td>
<td>Adopted 2009</td>
<td>Not yet</td>
<td>Possible</td>
<td>Unclear, but assume yes</td>
<td>Not available at the time of writing.</td>
<td>Review when available and include if necessary and if timescale allows</td>
</tr>
<tr>
<td>Eden Catchment Flood Management Plan</td>
<td>Includes part of plan area and area within 15km</td>
<td>Adopted 2009</td>
<td>Not yet</td>
<td>Possible, but unlikely due to location downstream of Allerdale</td>
<td>Unclear, but assume yes</td>
<td>Not available at the time of writing.</td>
<td>No</td>
</tr>
</tbody>
</table>
The Key Diagram identifies strategic locations for major new waste facilities, and key locations for supplying gypsum, brickmaking mudstones and varying high specification roadstones. See Core Strategy Policy 7.

It also highlights areas with a national or international environmental designation, see Core Strategy Policy 4 and the broad areas identified in the current (1982) Mineral Consultation Areas see paragraph 10.5.

Table 4 indicates that a few plans and many existing projects/developments have potential to give rise to likely significant effects in-combination with the ABC Local Plan - Stage2 Site Allocations. The Transport for the North Strategic Transport Plan (proposed infrastructure projects not yet published) presents potential in-combination effects relating to increased tourism and access to the countryside, with consequent effects of traffic emissions on air quality, resource requirements on water, and recreational disturbance/damage. The Cumbria Coastal Strategy Shoreline Management Plan provides potential in-combination effects along the coast including loss of habitats and functionally linked land, and changes in the natural processes of erosion and deposition may adversely affect Allonby Bay MCZ, Cumbria Coast MCZ and Solway Firth pSPA and Upper Solway Flats and Marshes Ramsar. These changes may be added to by any new discharges from site allocations. The Cumbria Joint Wind Energy SPD has scope for in-combination effects with Allerdale Wind Energy Policy and map on causal designations and functionally linked land for SPA birds.

Other nearby boroughs have plans which may act in-combination with Allerdale resulting in potential significant effects, again particularly in relation to wind farm projects, discharges to sea and infrastructure increasing access and air pollution relating to traffic.

Table 4 also shows development which has planning permission and/or is underway in Allerdale – Various of these sites have potential for in-combination effects when considered against proposed site allocations.

Allerdale BC has a high concentration of Natura 2000 sites within a small area. Due to various pathways of effect (e.g. air borne, via watercourses, along the coast, functionally linked land) development within much of the borough has potential to affect at least one designated site. The HRA for the Local Plan Part 1 was extremely complex due to the number of designations being considered. This Local Plan Part 2 HRA of the Site Allocations has found that in many cases there will be potential for significant in-combination effects and that it will be necessary to undertake site-specific HRA at a project level for many proposals. However the policies in the Local Plan 2014 itself, which underpins all future development in Allerdale, provides overall protection for all Natura 2000 sites (see in particular Policies S17, S19, S24, S34, S35, S36, S37 and DM17).
7.0 Appropriate Assessment

7.1 Appropriate Assessment of Site Allocations

The sites allocations discussed below have been highlighted in the assessment of likely significant effects (Table 2) as having potential for effects on Natura 2000 sites, either alone or in combination with other proposed site allocations. In many cases the potential for significant effect is similar and instead of discussing all sites in detail, the various individual effects are considered. Specific information relating to the individual site allocations is provided in the Screening Table 2.

RESIDENTIAL ALLOCATIONS

Policy SA8 – Land off Stainburn Road, Workington – previously 1/WOR/053A/R;
Policy SA9 – Main Road, Harrington, Workington – previously 1/WOR/056/R;
Policy SA10 – Land off Seaton Road, Seaton, Workington – previously 1/WOR/064/R;
Policy SA12 – Maryport Marina, Maryport – previously 1/MAR/013/R;
Policy SA13 – Whitecroft, Maryport – previously 1/MAR/017/A/R;
Policy SA15 – Land adjacent to Rugby Club, Station Road, Aspatria – previously 1/ASP/004/R;
Policy SA16 – Land at Noble Croft, Aspatria – previously 1/ASP/006/A/R;
Policy SA17 – Land at Station Road, Aspatria – previously 4/ASP/014/A/R;
Policy SA18 – Land off Brayton Road, Aspatria – previously 1/ASP/003/R;
Policy SA19 – Fellview, Silloth – previously 1/SIL/002;
Policy SA20 – Land adjacent to Wheatsheaf Inn, Abbeytown – previously 1/ABB/002/A/R;
Policy SA23 – Land adjacent to Meadowlands, Broughton Moor – previously 4/BRM/010/R;
Policy SA24 – Rose Farm, Broughton (Great and Little Broughton) – previously 1/BRN/007/R;
Policy SA25 – Land at the rear of Marona, West Lane, Flimby – previously 4/FLI/014/R;
Policy SA26 – Lynholme, Kirkbride – previously 3/KBR/010/R;
Policy SA27 – Birch Hall Lane, Kirkbride – previously 3/KBR/009/R;
GYPSY/TRAVELLER SITE ALLOCATION

Policy SA31 – Former caravan park, Oldside – previously part of Biodiversity site at Oldside – 3/WOR/096/GT

EMPLOYMENT SITE ALLOCATIONS

Policy SA36 – Land north of the Port of Workington – previously 1/WOR/032/A/E;
Policy SA37 – Land at Oldside, Workington – previously 1/WOR/034/A/E;
Policy SA38 – Land off Jubilee Road, Lillyhall – previously 1/WOR/046/E;
Policy SA39 – Land off Joseph Noble Road, Lillyhall – previously 1/WOR/047/M;
Policy SA40 – Land off Hallwood Road, Lillyhall – previously 1/WOR/048/M;
Policy SA41 – Land north of Branthwaite Road, Lillyhall – previously 1/WOR/049/A/M;
Policy SA42 – Land at Glasson Industrial Estate, Maryport – previously 1/MAR/009/A/E;
Policy SA43 – Land north of Low Road, Cockermouth – previously 3/COC/019/E;
Policy SA44 – Land south of Low Road, Cockermouth – previously 3/COC/025/E;
Policy SA45 – Land at Aspatria Business Park – previously 3/ASP/014/E.

Due to the large number of Natura 2000 sites and MCZ within, or in close proximity to, Allerdale, the majority of Policy Allocation Sites have scope to affect designated nature conservation sites through various pathways of effect. Many of these sites have been screened into more detailed AA because of the possibility of proposed developments alone and in-combination affecting functionally linked land to the Solway Firth pSPA. It has been proposed to extend the Solway Flats and Marshes SPA southwards along the coast of Allerdale to north of Whitehaven so forming a large Solway Firth pSPA. As much of the site allocation development is within 8km of the coast, these Policy sites have potential to support qualifying SPA birds and may lie within areas indicated as goose and swan flyways. In addition, there is potential for in-combination effects particularly in respect of increase recreational effects on the coast, deterioration of water quality and losses of functionally linked land.

The principal potential effects on sites in Allerdale taken forward to Appropriate Assessment may be grouped under the following recurrent themes –
• Potential disturbance, displacement and loss of habitat for qualifying bird species of the pSPA and Ramsar sites (functionally linked land) and loss of connectivity within goose/swan flyways;
• Potential for deterioration in water quality (run-off into watercourses linked to river SACs or to Solway Firth pSPA);
• Potential loss of habitat and disturbance to other qualifying species of Natura 2000 sites – natterjack toad, otter, or non-qualifying species affecting the Conservation Objectives of the site;
• In-combination recreational disturbance, noise, habitat degradation and littering due to increased population and tourism;
• Potential for hydrological change;
• Potential for air quality effects arising from increased in vehicles and potential employment/industrial emissions.

These topics are addressed below covering the whole document, instead of individual site allocations, to prevent unnecessary repetition. Please note that all of these issues have been dealt with in detail in Chapter 10 of the Local Plan HRA (WYG, 2013) which should be referred to in conjunction with this site allocations assessment as this provides the detail behind the AA. In addition the Policies contained in the Local Plan Part 1 (ABC) 2014, which underpins all development in Allerdale BC, provides ‘avoidance’ of any likely significant effect through robust principles and guidance.

7.1.1 Disturbance, displacement and loss of functionally linked habitat used by pSPA birds

The Solway Firth pSPA extends the existing Solway Flats and Marshes SPA southwards along the Cumbria coast to Whitehaven, resulting in the entire Allerdale coast being adjacent to this designation. The original HRA of the Local Plan was assessed and issued prior to this site being proposed. Potential effects are similar to those assessed for Solway Flats and Marshes SPA in the Local Plan Part 1 HRA (WYG, 2013) but much more widespread as a result of the entire Allerdale coast being included adjacent to the SPA, and hence likely significant effects on many Policy Sites are noted in Table 2.

The following proposed site allocations have now been screened into full AA due to the potential for development to cause disturbance to, displacement of or loss of habitat to pSPA birds using functionally linked land:

Distribution maps showing records of qualifying species of SPA and pSPA birds provided by Cumbria Biodiversity Data Centre at Tullie House indicate the spatial extent of land used by these birds, and they include land situated several kilometres inland of the designated sites (please refer to Appendix F of the Local Plan Part 1 HRA (WYG, 2013) with relevant qualifying SPA bird record maps for Allerdale). This may be for roosting, foraging, breeding etc. Addressing potential risk to the birds without more detailed survey is not possible so, without further localised information, many sites have been screened in as holding potential to cause likely significant effects on qualifying species of the Solway Firth pSPA (and existing SPA). These individual sites cannot therefore be subject to robust AA until site specific surveys are carried out at the detailed planning application stage.

In order to mitigate for this possibility and allow the Site Allocations Plan to be consistent with the requirements of the Habitats Regulations, each of these sites should be subject to site-specific assessment under the Habitats Regulations once the nature and extent of proposed development is known, at detailed planning stage. Depending on the initial site assessment this may require detailed ornithological survey to provide a robust evidence base for the HRA. Therefore in each of these examples a project level HRA is indicated in Table 2, and bird surveys are recommended where required.

In addition to the risk that development of individual sites may result in likely significant effects, there is also potential for development of two or more of these sites to give rise to in-combination effects on qualifying SPA birds. Cumulative losses of functionally linked land along the Allerdale coast and inland of this has potential to displace birds to the extent that there could potentially be a reduction in population size within the designated site. In-combination effects could be further exacerbated due to similar development of coastal land in Copeland, Dumfries and Galloway, and further afield in South Lakeland, and along the Lancashire coast.

Policy SA50 Areas Suitable for Wind Energy Development has an accompanying map which indicates areas suitable for any scale of wind development and areas where only small-scale windfarms would be acceptable. This Policy has been taken through to AA due to potential effects on SPA birds in Section 7.2.3.

Site-specific HRA to be undertaken, including detailed bird surveys where necessary to provide information on the use of the site by SPA birds (which may be seasonal).

Proposed developments should be assessed in-combination with other coastal developments in West Cumbria, Dumfries and Galloway and coastal north Lancashire.
7.1.2 Deterioration in Water Quality

Likely significant effects upon the River Derwent and Bassenthwaite Lake SAC, and the Solway Firth pSPA are anticipated due to potential deterioration in water quality as a result of the above allocation sites and policies. This may be as a result of surface water run-off both during construction and operation, and/or due to new discharges to SAC watercourses. Many of these impacts are unlikely to be significant and were screened out in previous draft HRA (WYG, 2016) due to the adoption of standard pollution prevention methodology but since then as a result of the recent the European Court of Justice decision in April 2018 for a site in Ireland, case from the Irish Republic, People Over Wind and Sweetman v Coillte Teoranta, it appears no longer possible to provide avoidance and mitigation at the screening stage for any likely significant effects resulting in no significant adverse effects. This judgment stated that "a full and precise analysis of the measures capable of avoiding or reducing any significant effects on the site concerned must be carried out not at the screening stage, but specifically at the stage of the appropriate assessment".

The following proposed site allocations have now been screened into full AA due to the potential for development to result in a deterioration in water quality of the River Derwent and Bassenthwaite Lake SAC - SA8, SA24, SA37/SA43, SA44, SA49.

Detailed Appropriate Assessment was undertaken for the Allerdale Borough Council Local Plan HRA (WYG, 2013), Section 10.3.1 with regards potential effects on the River Derwent and Bassenthwaite Lake SAC. This concluded that as it will be necessary to undertake HRA of any future discharges to the SAC watercourses and the discharges would be under the stringent control of the Environment Agency, the policies allowing and promoting development did not in themselves lead to any adverse effect on site integrity. Future HRAs for projects will take account of any in-combination effects of additional discharges to watercourses.

The following proposed site allocations have now been screened into full AA due to the potential for overall development to result in a deterioration in water quality of the Solway Firth pSPA, - SA12, SA13, SA19, SA20, SA25, SA26, SA31, SA36, SA37, SA42,

All these sites have hydrological connectivity to Solway Firth and therefore any development could potentially result in polluted run-off and increased consented discharges to reach the designated sites in the Solway. However, the allocations proposed are generally small numbers of residential units, (between 10 and 45 units). There are 300 residential units proposed under Policy SA13 at Whitecroft, Maryport, as well as a small development at the harbour. These sites drain respectively into Maryport Marina, where any pollution might be concentrated and hence stringent pollution control and prevention will need to be adopted both during and construction and operation; and into tidal reaches...
of the River Ellen where there will be immediate mixing and dilution of any run-off or consented
discharges which will be taken out into the Solway pSPA on the ebb tides. Policy SA37 occupying
10.36 hectares at the Port of Workington and SA36 comprising 9.34 hectares of employment land
proposed along the cliffs at Oldside, Port of Workington both drain towards the coast immediately
north of the River Derwent estuary through the Port of Workington. Again any potential for water
quality deterioration will be controlled through pollution prevention methodology and requirement for
consents to discharge from the EA.

Section 10.1.1 of the Local Plan Part 1 HRA addresses potential for alone and in-combination effects
on the Solway Firth and concludes –

"It is therefore concluded that development policies within Allerdale Borough Council Local
Plan are unlikely to contribute to a deterioration or alteration in water quality in the Solway
Firth, either alone or in-combination with other plans or policies, which would significantly
affect the integrity of the site, as any new discharges would have to be consented and United
Utilities and the Environment Agency are already aiming to improve the quality of
watercourses draining from Allerdale into the Solway Firth.

The Environment Agency undertakes an ongoing programme of water quality monitoring
which underpins its statutory pollution control duties. This includes strategic surveys of river
invertebrates and chemical water quality, reactive surveys in response to pollution incidents
and more specialised surveys to investigate or target particular water quality problems. These
practices will ensure that the water quality in receiving watercourses is regularly monitored
and sources of pollution investigated and controlled. It is therefore not anticipated that
additional sewage effluent discharges from developments arising from the Local Plan policies
will result in significant adverse impacts on the overall water quality in the Solway Firth where
additional dilution capacity is provided.

Therefore it is concluded that Allerdale Borough Council Local Plan is unlikely to have an
Adverse Effect on the Integrity of the Solway Firth Marine Site as a result of water quality
issues arising from development within Allerdale. In-combination effects on water quality
resulting from development associated with Dumfries and Galloway Local Plan and with
Annandale and Eskdale Local Plan are considered to be unlikely to have an Adverse Effect on
the Integrity of the Solway Firth due to the limited residential and employment development
proposed along this coastline. Any new discharges entering the Solway Firth directly or
indirectly through catchment watercourses will require assessment of likely significant effect.
In Allerdale the Local Authority Planning Validation Check for developments is to be revised to
reflect the contents of the Local Plan to ensure that ALSE is recommended where required.”
7.1.3 Land take and disturbance – potential loss of habitat and disturbance to other protected species

This section considers potential for significant effects on otter, natterjack toad and hen harrier arising from specific site allocations within Allerdale and including any in-combination effects.

Otter

A few sites have low potential to support otter (qualifying species of the River Derwent and Bassenthwaite Lake SAC) due to proximity to the coast at Workington or connectivity to the River Derwent itself. These are Policies SA36, SA37. There is possibility that otter from the river make use of nearby land for cover and possible holts/other resting places which can be 100m or so from the watercourse/coast. Otter surveys will be required in these cases, and if found to be using the site then an EPSL licence is likely to be required to allow development to proceed.

Avoidance measures should be adopted and may include provision of buffer zones, avoiding working in the watercourse itself, or no night-time working; if this cannot be adopted then suitable mitigation needs to be in place to protect the otter, such as use of otter proof fencing, avoidance of culverts and road crossings and retention of otter habitat. If compensation is required this will involve enhancement of otter habitat, provide alternative connectivity where necessary, build underpasses under roads, etc aiming to result in no net loss of otter habitat following development and no reduction in the otter population as a result. An European Protected Species licence may be required to enable works to progress.

The above measures will ensure that the integrity of the River Derwent and Bassenthwaite Lake SAC will not be adversely affected by the site allocations and policies proposed through disturbance or loss of habitat to otter.

Natterjack toad

Natterjack toad *Epidalea calamita* is a qualifying species of the Solway Flats and Marshes Ramsar site. This site supports over 10% of the UK breeding population. Policy sites to the north of Allerdale in Kirkbride (Policies SA27, SA26) have been assessed as having potential to have a significant effect on natterjack toad habitat. This is through loss of terrestrial habitat, changes in hydrology, recreational pressure, and water pollution. Developments proposed in Kirkbride are for 45 units at Lynholme 950m from the Ramsar site, and 6 units at Birch Hill, 650m from the designated site. Although small scale the developments could give rise to increased recreational pressure along the nearby coast where breeding pools are located. In addition any changes in hydrology or water quality draining to the Solway Firth could adversely affect their breeding and terrestrial habitat. It is unlikely that they
use these two sites for terrestrial habitat due to the distance from the breeding pools but it is possible for these amphibian to cover journeys in excess of 1km. Site-specific surveys will need to be carried out to ensure that there are no direct or indirect effects on this species. In addition mitigation for increased local population using the site for recreation and dog-walking will need to be adopted aiming to attract use of less sensitive areas of the coast. Due to the potential for adverse effects on all designations of the Solway, detailed survey and HRA is recommended at the project level planning stage.

Should any likely significant effect be identified, this should be avoided if at all possible. Mitigation for likely significant effects is likely to involve EPSL licencing and might require temporary natterjack toad exclusion fencing, habitat enhancement, toolbox talks during the construction phases, and provision of recreational access away from sensitive areas.

The above measures will ensure that the integrity of the Upper Solway Flats and Marshes Ramsar site will not be adversely affected by the site allocations and policies proposed through disturbance or loss/deterioration of habitat to natterjack toad.

**Hen Harrier**

The Hen Harrier sensitive zone is shown on Figures 6a and 6c in Appendix A. Natural England have advised that this area should be assessed as if equivalent to an SPA. Policy sites SA38, SA39, SA40 and SA41 are all located either within, adjacent to, or in close proximity to the protection area and as such have been brought forward to Appropriate Assessment. Without detailed ornithological surveys of the sites it is not possible to assess whether or not there could be loss of habitat and/or disturbance to this species and hence project level HRA is recommended. This should include loss of habitat supporting prey species. In the event of likely significant effects on the population of this species, avoidance, and if not possible, specific mitigation such as habitat enhancement will need to be addressed. This might involve low or reduced lighting of the site, restrictions on the timing of construction to avoid presence of this species, provision of buffer zones, restrictions on piling and other noisy operations when hen harrier are present, provision of screens to reduce visual/human disturbance, and restrictions on site use such as operational noise levels, working hours etc.

The above measures will ensure that the hen harrier population supported in the Hen Harrier Protection Zone is not adversely affected by the site allocations and policies proposed through disturbance and/or loss of habitat.
7.1.4 Recreational Effects

Policy Site developments within reach of the coastal designations in Allerdale have been scoped into full Appropriate Assessment due to their potential for in-combination effects. As many of the proposed residential sites are allocated within 8km of the coast it is anticipated that local residents will make use of the coast at least from time to time, and that closer developments may give rise to a greater increase in daily use of the coast for dog-walking, running, and other leisure pursuits. Site allocations for residential development are all within or adjacent to existing settlements, so there are no new developments along more remote areas of the Allerdale Coast. The Cumbria coast is long and presently little developed; proposed increases in local population are generally low, situated in existing communities, and therefore unlikely to exert sufficient pressure on the coast to cause any significant effects on the designated sites of Solway Firth pSPA, Allonby Bay MCZ and Solway Firth pMCZ.

Policy SA32 Tourism, Coastal and Countryside Recreation proposing facilities to support recreation could act in-combination with the site policies, as could projects already planned and/or in construction such as the Allonby to Silloth cycleway and Cumbria Coastal path. In-combination effects of the total population increase within the Borough and increased tourist facility may have potential to result in certain key areas along the coast suffering from increased usage. This may result in direct damage to habitats such as sand dunes, mosses, shoreline etc and to qualifying species, through cycling, walking, littering and fly-tipping, picnicking, kayaking/boating, use of motor boats, noise, visual disturbance, and human presence.

Safeguards to mitigate for increased recreational use of the coast (and other key attractions such as the River Derwent) have already been incorporated into the Allerdale Local Plan, which underpins any policies and future development in Allerdale, to protect Natura 2000 sites and biodiversity – Ref. ABC Local Plan Part 1 2014 - Policies S06, S2, S24, S35. Avoidance of more sensitive areas of the coast is indicated in the ABC Local Plan Part 1 Policy S17. The Local Plan HRA states that Natural England have indicated that recreational impacts Allerdale can be adequately addressed at a later stage in the planning process by careful management of proposals.

Practical and strategic measures to avoid likely significant effect on Natura 2000 sites include provision of carparks, footpaths and cycleways and tourist facilities in less sensitive areas, installation of board walks over sand dunes/mosses to direct walkers and avoid erosion of adjacent habitats, signposting, provision of dog bins to prevent eutrophication of habitats used by dog-walkers, fencing-off of valuable habitat, interpretation boards etc. Policies S06, S2, S24, S35, S37 and S17 of the Local Plan Part 1 and SA32 of the Part 2 Site Allocations all contain clauses which clearly prioritise the conservation and enhancement of the natural environment.
As a result of Policies contained in the ABC Local Plan Part 1 2014 which underpin the Site Allocations, there is unlikely to be any significant effect on qualifying features of designated sites when each development is considered alone, or in-combination, provided that suitable mitigation for increased local population is adopted.

7.1.5 Hydrological Change

The Table in Figure 2 indicates Policy sites which have potential to give rise to local hydrological change which could impact qualifying features of designated sites. These are Policies SA26 and SA27 where the land is low-lying and may be underlain by peat. The proximity of these sites to the Solway Firth Natura sites (and the potential Solway Firth MCZ) has led to recommendations for more detailed survey and assessment under the Habitats Regulations at the detailed project planning stage. No further assessment is made at this level (but see potential for effects on natterjack toad above in 7.1.3).

7.1.6 Air Quality Effects

Air quality effects are noted for a few of the site allocations where there is scope to have adverse effects on the South Solway Mosses SAC and Lake District High Fells SAC habitats, although for most developments this is not anticipated to be an issue. The table in Figure 2 therefore specifically states that site-specific assessment under the Habitats Regulations will be required should the proposed development give rise to significant airborne emissions such as a biomass plant.

In-combination effects on air quality as a result of increased residential and employment development needs to consider the overall increase in vehicular use as a result. Most of the proposed allocations when considered ‘alone’ would be unlikely to give rise to significant effects on air quality but in-combination effects of increased overall traffic travelling to these areas has potential to affect habitats and species sensitive to air pollution. These include the lower plants in the old sessile oak woodlands, wet and dry heaths, bogs, alkaline fens etc of the Lake District High Fells and raised bogs and heathland within South Solway Mosses SAC. Road traffic exhausts result in pollution to air from oxides of nitrogen.

Natural England policy in agreement with the EA in their Review of Consents is that a threshold of 30 microgrammes per cubic metre per annum should apply to designated sites (see Air Pollution Information System (APIS) impacts on different habitat types – [www.apis.ac.uk/habitat_table.html](http://www.apis.ac.uk/habitat_table.html)). APIS has been developed in partnership by the UK conservation agencies and regulatory agencies and the Centre for Ecology and Hydrology. This provides empirical critical loads for air pollution for all the different habitats within Natura sites in the UK. For example critical loads for Nitrogen (N) are 10-15 kg N/ha/yr for sessile oak woodlands such as the Borrowdale Woodlands, and for temperate...
montane grasslands; for oligotrophic to mesotrophic lakes and tarns the critical level is lower at 5-10 kg N/ha/yr. Although air quality is expected to improve due to efficiency of fuel usage in modern vehicle engines, increased traffic is considered likely to outweigh any improvements in air quality due to improved technology, particularly if considering potential traffic increases due to in-combination effects associated with Nationally Significant Infrastructure Projects along the West Cumbrian Coast.

The background levels of air pollution in the area already stand at about 27kg N/ha/yr, but local road traffic gives rise to less than 5% of this (1.35kg N/ha/yr). Increase in traffic as a result of the Local Plan is not likely to exceed 5-7% of the existing traffic on the A66, the major access route to Allerdale from the M6, so that actual increase in the N load as a result will be less than 0.06-0.09kg N/ha/yr which is considered to be an insignificant increase. The effect of this traffic air pollution is felt mainly within 200metres of the carriageway. It is therefore considered that plant species and habitats located in this corridor will already have been impacted by traffic pollution and the small increase in the N load will not result in any significant change to the existing vegetation cover. Likewise locally around areas of allocated residential development, the increase is not likely to cause any significant rise in air pollution.

Most of the qualifying habitats in the Lake District High Fells are sensitive to nitrogen pollution and are likely to have been significantly adversely affected over time along the A66 corridor as this is the main link to the M6 and one of only two main roads accessing Allerdale and North West Cumbria from the east (Angold 1997 The impact of a road upon adjacent heathland vegetation: Effects on plant species composition Journal of Applied Ecology 34 409-417). The A66 passes from west to east directly through the Lake District High Fells SAC along the River Derwent and Bassenthwaite Lake SAC. The boundary of the Lake District High Fells Natura 2000 site lies adjacent to the A66 at Threlkeld between Keswick and Troutbeck and is generally located within a mile of the road. The majority of effects will be within the 200m corridor either side of the A66 so this marginal effect is not anticipated to have any adverse effect on the integrity of Natura 2000 sites. Please refer also to the Local Plan HRA (WYG;2013) which address air pollution in more detail in Sections 10.2.1,

The precautionary principle has been adopted when considering potential for significant effects from employment sites as these might involve development which gives rise to airborne pollution such as a biomass plant. In these cases project-specific HRA would be required. It is not possible at this stage to therefore state that there will be no likely significant in-combination effects as a result of the Policies in the Local Plan Stage 2 Site Allocations, but much of the airborne pollution will be traffic related in-combination with other developments along the Cumbrian coast including Copeland, rather than as a result of developments in Allerdale which are in general small and widely distributed (see maps in Figures 1a, 1b and 1c in Appendix A).
7.2 Appropriate Assessment of Policies

The Screening Table in Figure 3 of Section 5.0 listed the following Policies as requiring an Appropriate Assessment due to the potential for likely significant effects on Natura 2000 sites:

- Policy SA32 Tourism, Coastal and Countryside Recreation.
- Policy SA49 Lower Derwent Valley.
- Policy SA50 Wind Energy.

These are discussed below.

7.2.1 Policy SA32 Tourism, Coastal and Countryside Recreation

Policy S17 of the ABC Local Plan 2013 covered Tourism, Coastal and Countryside Recreation, and this states very clearly that no proposed development with potential to affect any Natura 2000 site or other designated sites would be allowed. Section 4.6.4 of the Local Plan Part 1 HRA (WYG, 2013) provides detailed assessment of this policy and should be referred to for further information. Part of the assessment is reproduced here –

* the present recreational use of this coastline is low and Natural England are of the opinion that recreational impacts can be adequately addressed at a later stage in the planning process by careful management of any proposals to attract tourism and recreational use along this coast. As mitigation the Local Plan incorporates various safeguards for Natura 2000 sites within its policies. S17 states that Allerdale’s greatest tourist assets lie in the natural environmental which is also the most sensitive resource. It stipulates that although there is a desire to develop tourism along the coast the priority must always be to conserve and protect the natural (and historic) environment from detrimental development. Any developments with potential to have a direct or indirect significant effect on a Natura 2000 site would be expected to provide information to support an Assessment of Likely Significant Effect (ALSE), and where proposals are shown to have a likely significant effect which cannot be successfully mitigated they will not be allowed to go ahead.

This policy was initially screened into the assessment of the first draft 2012 due to the various pathways which may link increased tourism to effects on Natura 2000 sites, including increased human disturbance and recreational pressure/damage, dog-walking, increased traffic along rural roads. It is considered that this policy now contains adequate provision, together with other policies contained in the Local Plan regarding the natural environment, to afford protection to any Natura 2000 site, ecologically sensitive habitats and species, and other biodiverse sites. There are also very positive objectives stated in the policy to attract
tourists to less sensitive areas and hence relieve pressure on vulnerable habitats. There is no evidence to suggest that the increased tourist numbers likely to arise as a result of the Local Plan will have a likely significant effect on any Natura 2000 site within or adjacent to Allerdale Borough.

Key areas mentioned in the policy for the support of tourism projects are Maryport Harbour, Derwent Forest, Derwent Valley, Hadrian’s Wall, and Solway Coast AONB. Of these the only concern with regards Natura 2000 sites is the Solway Coast AONB which has been addressed above. Any development of tourism within this coastal zone would be subject to the clauses contained in this policy which very clearly prioritise the conservation and enhancement of the natural environment.

7.2.2 Policy SA49 Lower Derwent Valley

Policy SA49 Lower Derwent Valley includes proposals for enhancing and protecting the area and identifying opportunities to protect and enhance ecological value whilst improving flood storage capacity, informal recreation, cycle and pedestrian pathways to the town centre. It has been taken forward to Appropriate Assessment stage due to the potential for any further development to impact on the River Derwent and Bassenthwaite Lake SAC and qualifying habitats and species which include otter and migratory fish. However, the Policy contains very strong protection for this Natura 2000 site in Section 130. Much of the undeveloped part of the valley is included in the Biodiversity Network map for Allerdale.

Policy SA49 provides adequate future protection of the River Derwent and Bassenthwaite Lake SAC in Section 130. This states that Appropriate Assessment will be required for any sites where there are likely significant effects directly or indirectly on the SAC. It is concluded that this Policy is unlikely to result in any adverse effects on site integrity, alone or in-combination with other sites and policies.

7.2.3 Policy SA50 Wind Energy

Policy SA50 with an accompanying Map indicating areas suitable for wind energy development indicates that the whole of Allerdale is potentially suitable for some degree of wind farm development, although sensitive areas in terms of ‘landscape’ are listed and shown as areas suitable for small-scale wind farm development only. Natura 2000 sites and other conservation areas are protected under the overarching Policy 19 of the Allerdale Borough Council Local Plan 2013, however there is no inclusion of nature conservation sites in Policy SA50 itself.
Allerdale Borough Council – Habitats Regulations Assessment of Local Plan Site Allocations September 2019

The need to consider Natura 2000 sites in relation to wind farms is even more important since the proposed extension of the Solway Firth pSPA southwards along the entire Allerdale coastline, which was not considered at the Local Plan stage. Of significance is the need under the Habitats Regulations to also protect any functionally linked habitats used by pSPA birds, some of which may lie some distance inland from the site itself. In order to address this concern many of the proposed allocation sites will need to be assessed in detail at the planning stage, and therefore may require the inclusion of bird surveys, assessments of collision risk and potential in-combination effects – including the disturbance / displacement of birds.

The RSPB paper *Wind Turbines and Sensitive Bird Populations – A spatial planning guide for onshore wind farms in Cumbria* was produced in December 2007 to identify areas of particular value to protected birds and is supported by Natural England and Cumbria Wildlife Trust. There is additional spatial guidance provided in *Wind Turbines and Peat Soils: A spatial Planning Guide for on-shore wind farm developments in Cumbria* RSPB July 2008 which maps areas of blanket bog, lowland raised mire and fen which are all vulnerable habitats concentrated in inland areas behind the Solway Coast in Allerdale.

Although the protection of the Natura 2000 sites is very clearly stated in the ABC Local Plan Stage 1 document, the 'Allerdale Local Plan Stage 2 - Site Allocations' does not acknowledge the importance of recognizing the potential effects of wind farms on birds, rather concentrating solely on landscape features. As stated in the Screening Table 3, the sensitivity zones have been identified to provide additional protection to the following areas –

- Hadrian’s Wall World Heritage Site (and its buffer zone)
- The Solway Coast Area of Outstanding Natural Beauty; and
- The Lake District National Park World Heritage Site.

The sensitive nature conservation sites are as follows, and parts of these are within the areas which are said to be suitable for all scales of wind energy development -

- Solway Firth pSPA all along the coast of Allerdale;
- Goose and swan sensitive areas and flyways along north-west coast and inland of this in Allerdale;
- Hen Harrier Protection zone to the south of Allerdale;
- South Solway Mosses SAC in the north (sensitive habitats and breeding birds); and
- The River Derwent and Bassenthwaite Lake SAC and the River Eden and tributaries SAC corridors.
Policy S19 in the Local Plan (Stage 1) provides the policy context, along with other relevant policies, to assess individual wind energy schemes, and contains text protecting Natura 2000 and other ecologically sensitive sites from windfarm development at strategic level. This offers overall protection to Natura 2000 sites, and Policy 50 has been specifically signposted to Local Plan Policy S19.

The Local Plan Part 1 HRA (WYG; Sept 2013) states –

"Allerdale Local Plan itself addresses this concern in Policy S19 providing clear requirement for additional bird surveys and HRA of windfarm developments with any likely significant effect, either alone or in-combination with other schemes. Text added includes –

The Council will take a positive view where proposals (either in isolation or cumulatively) –

- Do not have an adverse effect on any European/International protected nature conservation site (including SACs, SPAs and Ramsar sites, candidate SACs, potential SPAs and proposed Ramsar sites) including its qualifying habitats and species, either alone or in-combination with other plans or projects.
- Do not have a significant adverse effect on any National nature conservation site (Site of Special Scientific Interest; National Nature Reserve), except where the benefits of the development clearly outweigh both the impact on the site and any broader impacts on the wider network of National sites.
- Do not result in loss or harm to a Local nature conservation site, including habitats or species supported by Local Sites, unless it can be demonstrated that there is a need for the development in that location and that the benefit of development outweighs the harm or loss'.

In addition specific text has now been inserted to cover requirements for ALSE and potential for impacts on SPA birds as follows –

"The Habitats Regulations Assessment produced alongside this plan suggests that without detailed assessment and bird surveys it is difficult to prove that further wind turbines will not have a cumulative effect on the SPA bird populations during construction and operation of the wind farms. Therefore, wind development proposals will be expected to demonstrate that there will be no significant adverse effects on protected bird or bat species, when considered alone and in-combination with other existing and proposed wind turbines or vertical structures. The Allerdale Local Validation Checklist provides further details on the circumstances and survey scope that will be expected."
An Assessment of Likely Significant Effect should be carried out on any developments with potential for impacting directly or indirectly on Natura 2000 sites. Appropriate Assessment will be required for any development with a likely significant effect on Natura 2000 sites. Where proposals have a significant adverse effect on Natura 2000 sites that cannot be made acceptable through mitigation they should not be allowed to go ahead. Where mitigation is proposed, measures should be clearly defined and where appropriate secured by planning obligations’.

Potential cumulative/in-combination effects due to windfarm proposals arising outwith Allerdale will be, or have already been, addressed in other adjoining authorities Local Plans and HRA as this is beyond the remit of Allerdale Borough Council. The Local Plan fully recognizes potential for in-combination effects and has addressed this issue adequately so as to prevent any Adverse Effect on the Integrity of the Solway Firth.

It is therefore considered that Allerdale Local Plan adequately protects Natura 2000 sites through detailed requirements for developers to assess any renewable proposals to provide sufficient information to demonstrate that there will be no significant adverse effect on SPA birds which would be likely to result in an impact on the integrity of the Natura 2000 site. The Local Plan states that the studies should consider both alone and in-combination effects of new developments. It is considered that potential cumulative effects on SPA birds as a result of NSIPs affecting Allerdale fall outside the remit of the local plan policies, and should be determined through detailed surveys to be undertaken at a National Level. Therefore the Local Plan policies concerned with renewable energy development are now considered to contain adequate text to protect the qualifying features of Natura 2000 sites from likely significant effect, and hence no adverse effect on the integrity of Natura 2000 sites will arise due to the Local Plan when considered in isolation’.

In-combination effects of wind farm developments along the coast together with other economic development including in particular other vertical infrastructure such as pylons and tall buildings are possible.

**Recommend that the sensitivity zones shown on the map as only suitable for small-scale turbines be amended to include the ecologically sensitive designated nature conservation sites listed above.** At present despite the clear signposting to Local Plan Policy S19, which underpins the assessment of site-specific schemes, the map itself is based on landscape and historic environment evidence resulting in potential to overlook ecologically sensitive areas. This inconsistency in mapping was picked up in the revised Local Plan Part 1 HRA (WYG, 2017).
Policy S19 provides a clear requirement for additional bird surveys and HRA of wind farm developments with any likely significant effect, either alone or in-combination with other schemes. This provides overall protection from inappropriate wind farm development in Allerdale, and hence no adverse effects will arise as a result of this policy.

The accompanying map is however misleading in that there is no consideration of nature conservation sites; it is recommended that this map is altered to include ecological designations within areas which are shown as sensitive to wind energy development instead of including only landscape and historical designations. This would mean extending the area shown as potentially only suitable for small scale wind farms southwards along the Allerdale coastline and inland to include SAC watercourses and the South Solway Mosses.

Due to the spatial extent of the Solway Firth pSPA it is considered likely that the majority of proposed wind energy developments in Allerdale will require, as a minimum, an assessment of likely significant effect.
8.0 Conclusions

The screening of the Site Allocations demonstrated that although some Allocation Sites and Policies have potential for likely significant effects on Natura 2000 sites to arise, following Appropriate Assessment the effects can in most cases be mitigated through avoidance, retention of biodiversity features, pollution control measures, and biodiversity enhancement. If mitigation is adopted these Site Allocations and Policies are considered to have no potential for significant effect on Natura 2000 sites, either alone or in-combination with other plans, projects and policies. In addition the Allerdale Local Plan Part 1 2014 underpins all future development and provides overall protection for Natura 2000 sites. All proposals for development are governed by the policies in this Plan and the corresponding HRA (WYG, 2013 updated 2017) has assessed likely significant effects in detail.

Many of the site allocations do have scope to affect functionally linked land supporting qualifying species from the Solway Firth pSPA which now extends along the entire Allerdale coastline. In order to prevent adverse effects on the designated site, site-specific HRA at the project planning stage will need to be carried out for these allocations, as indicated in the Screening Table in Figure 2.

The Local Plan Stage 2 Site Allocations Policies are assessed in Table 3; only three of these went through to Appropriate Assessment. The only Policy which is less robust in its protection of European nature conservation sites is Policy SA50 Wind Energy.
9.0 References


DCLG (Aug, 2006) Department for Communities and Local Government – Planning for the Protection of European Sites: Appropriate Assessment


Holohan & Ors. v An Bord Pleanála, 7 November 2018, C - 461/17

Mott MacDonald (Jan 2015) Shadow Habitat Regulations Assessment

People Over Wind and Sweetman v Coillte Teoranta, 12 April 2018, C – 323/17


Scott Wilson (Sept 2007) Appropriate Assessment of the St Helens Core Strategy Preferred Options Development Plan Document


www.magic.gov.uk
Figures (no changes to original)