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Habitats Regulations Assessment Report to accompany the Draft Uttlesford Local Plan 2021-2040

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Summary

The Conservation of Habitats and Species Regulations 2017 (as amended) require local authorities to assess the impact of their local plan on the internationally important sites for biodiversity in and around their administrative areas. Together, these Special Protection Areas, Special Areas of Conservation and Ramsar sites are known as European sites. The task is achieved by means of a Habitats Regulations Assessment (HRA).

An HRA asks very specific questions of a plan. Firstly, it 'screens' the plan to identify if there is a risk that certain policies or allocations may have a 'likely significant effect' on a European site, alone or (if necessary) in-combination with other plans and projects. If the risk of likely significant effects can be ruled out, then the plan may be adopted but if they cannot, the plan must be subjected to the greater scrutiny of an 'appropriate assessment' to find out if the plan will have an 'adverse effect on the integrity' of the European sites.

Following an appropriate assessment, a Plan may only be adopted if an adverse effect on the integrity of the site can be ruled out. If necessary, a plan should be amended to avoid or mitigate any likely conflicts. This usually means that some policies or allocations will need to be modified or, more unusually, may have to be removed altogether.

This HRA report has been produced alongside the Draft (Regulation 18) version of the Uttlesford Local Plan and is therefore produced at an early stage in the Plan. The HRA is iterative and will be updated at each public consultation stage in the plan making process and will be finalised at adoption.

We have screened this version of the Plan and identified likely significant effects in-combination with respect to the disposal of wastewater and for recreation. The relevant sites (for both impacts) are the Essex Estuaries SAC and the Blackwater Estuary (Mid Essex Coast Phase 4) SPA/Ramsar.

Given the level and distribution of growth and the mitigation set out in the Plan, a conclusion of no adverse effects on integrity with respect to recreation impacts and the Essex Estuaries SAC and the Blackwater Estuary (Mid Essex Coast Phase 4) SPA/Ramsar can be reached at this stage in the plan-making.

With respect to the disposal of wastewater, further checks are necessary on the capacity at the relevant sewage treatment works and the implications for the Essex Estuaries SAC and the Blackwater Estuary (Mid Essex Coast Phase 4) SPA/Ramsar. These checks are necessary to inform the next iteration of the HRA. Given that much of the growth proposed lies within the Thames Water area (and therefore will not relate to the Essex Coast) and the large distances from Uttlesford to the coast, the risks are relatively low.

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1. Introduction

Overview

- 1.1 This report is a Habitats Regulations Assessment (HRA) report to accompany the Uttlesford Local Plan ('the Plan') and has been prepared by Footprint Ecology on behalf of Uttlesford District Council. An HRA assesses the implications of a plan for legally protected European sites.
- 1.2 The HRA will be updated at each stage of the Local Plan, at each public consultation stage. The HRA will be finalised at the point at which the Plan is ready for adoption. This report accompanies the Draft Local Plan (Regulation 18 version), and as such is produced at a relatively early stage in the plan making process.

The Uttlesford Local Plan

- 1.3 The District of Uttlesford extends across approximately 650km² of north-west Essex and has a population of just over 91,000. The two largest settlements are Saffron Walden to the north and Great Dunmow to the south. The district is predominantly rural, however it does support Stansted Airport and is situated along the M11 trunk road which runs from north to south and connects Cambridge and London.
- 1.4 The new Local Plan will replace the existing Adopted Local Plan 2005. It will set out the proposed strategy for meeting the district's social, economic and environmental needs up until 2041. It will set out the Spatial Vision and Strategic Objectives for addressing climate change and setting out the Council's Spatial Strategy for meeting future development needs, including proposed site allocations, design principles and development management policies by which planning applications will be judged.

Habitats Regulations Assessment process

- 1.5 The designation, protection and restoration of European wildlife sites is embedded in the Conservation of Habitats and Species Regulations 2017, as amended, which are commonly referred to as the 'Habitats Regulations'. Importantly, the most recent amendments (the Conservation of Habitats and

Species (amendment) (EU Exit) Regulations 2019¹) take account of the UK's departure from the EU.

- 1.6 Regulation 105 *et seq* addresses the assessment of local plans and determines the scope of this HRA alongside recent Government Guidance on the interpretation and application of the Regulations².

European sites

- 1.7 'European sites' are the cornerstone of UK nature conservation policy. Each forms part of a 'national network' of sites that are afforded the highest degree of protection in domestic policy and law. They comprise Special Protection Areas (SPA) classified under the 1979 Birds Directive and Special Areas of Conservation (SAC) designated under the 1992 Habitats Directive. As a matter of policy, potential SPAs (pSPAs), possible SACs (pSACs) and those providing formal compensation for losses to European sites, are also given the same protection³.
- 1.8 The network safeguards the most valuable and threatened habitats and species across the country and Europe. Prior to Brexit, this formed part of the EU-wide Natura 2000 network of SPAs and SACs to form the largest, coordinated network of protected areas in the world.
- 1.9 The designations made under the European Directives still apply and the term, 'European site' remains in use. The term Habitats site is also used and includes any site which would be included within the definition at regulation 8 of the Habitats Regulations. According to long-established Government

¹ The amending regulations generally seek to retain the requirements of the 2017 Regulations but with adjustments for the UK's exit from the European Union. See Regulation 4, which also confirms that the interpretation of these Regulations as they had effect, or any guidance as it applied, before exit day, shall continue to do so.

² Habitats regulations assessments: protecting a European site. Defra and Natural England. 24 February 2021. <https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site>

³ For the avoidance of doubt, the list of statutory European sites also comprises: A site submitted by the UK to the European Commission (EC) before Exit Day (a candidate SAC or cSAC) as eligible for selection as a Site of Community Importance (SCI) but not yet entered on the ECs list of SCI, until such time as the Appropriate Authority has designated the site or it has notified the statutory nature conservation body that it does not intend to designate the site. After Exit Day, no further cSACs will be submitted to the EU. Statutory European sites also include SCI included on a list of such sites by the European Commission from cSACs submitted by the UK before the UK left the EU, until such time as the UK designates the site when it will become a fully designated SAC.

policy⁴, European sites also comprise 'Wetlands of International Importance' (or Ramsar sites) although these do not form part of the national network.

- 1.10 The overarching objectives of the national network is to maintain, or where appropriate, restore habitats and species listed in Annexes I and II of the Habitats Directive to a Favourable Conservation Status, and contribute to ensuring, in their area of distribution, the survival and reproduction of wild birds and securing compliance with the overarching aims of the Wild Birds Directive.
- 1.11 The appropriate authorities must have regard to the importance of protected sites, coherence of the national site network and threats of degradation or destruction (including deterioration and disturbance of protected features) on SPAs and SACs.

Role of the competent authority

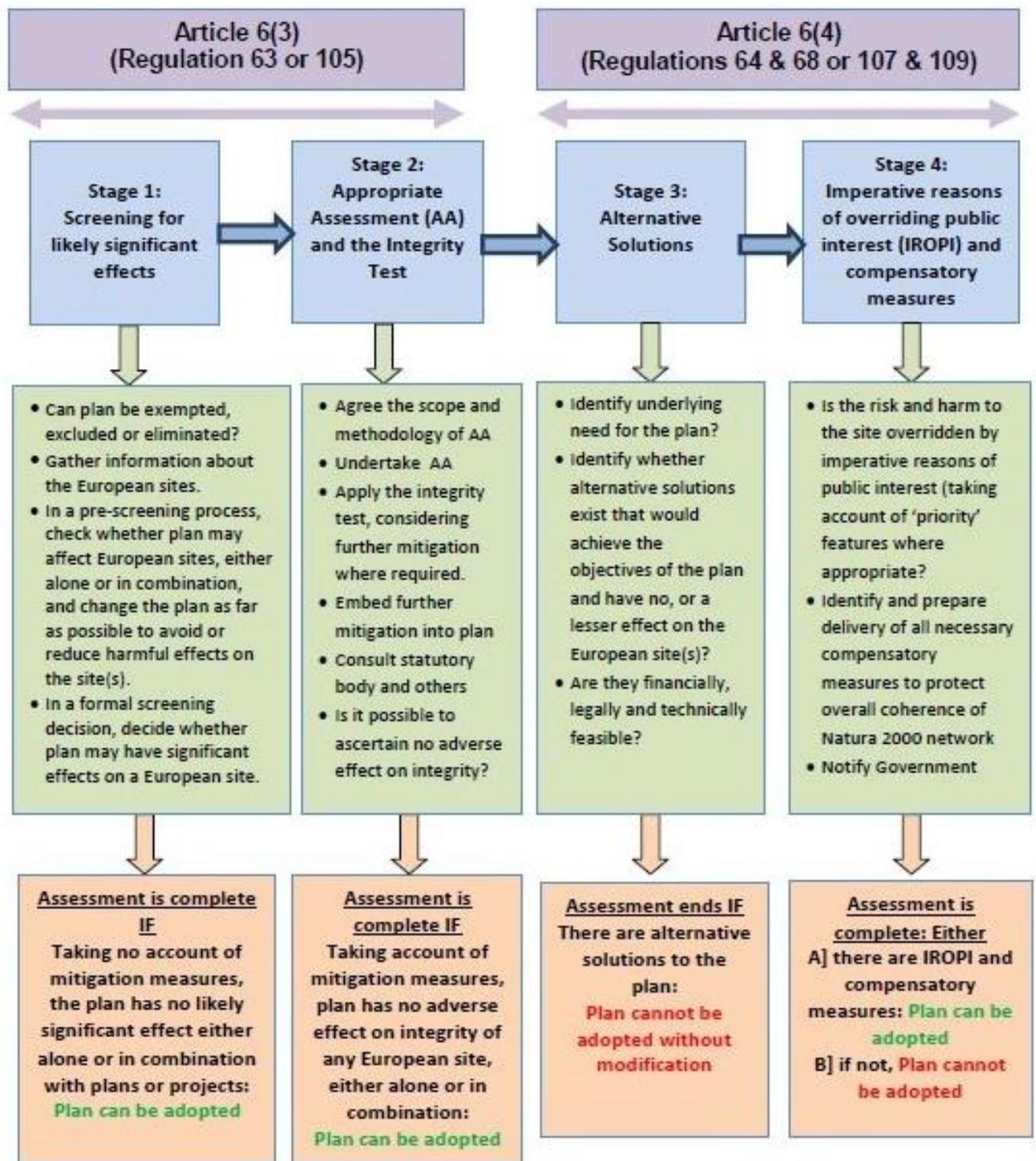
- 1.12 The finalised HRA will help the Council discharge its duties under the Habitats Regulations. However, the Council is the competent authority, and it must decide whether or not to accept the HRA. Further, it should be noted that the final HRA will have been prepared for the purposes of preparing and examining the Plan. Individual allocations will need to be reviewed when they become the subject of an individual planning application, to ensure that if further assessment under the Habitats Regulations is necessary, it is undertaken in accordance with the requirements of appropriate assessment.

Process

- 1.13 The step-by-step process of HRA is summarised in Figure 1.

⁴ ODPM Circular 06/2005: Biodiversity and Geological Conservation – Statutory Obligations and their Impact within the Planning System (16 August 2005), to be read in conjunction with the current NPPF, other Government guidance and the current version of the Habitats Regulations.

Outline of the four-stage approach to the assessment of plans under the Habitats Regulations



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Figure 1: Outline of the assessment of plans under the Habitat Regulations

- 1.14 Throughout all stages, there is a continual consideration of the options available to avoid and mitigate any identified potential impacts. A competent authority may consider that there is a need to undertake further levels of evidence gathering and evaluation at the appropriate assessment stage in order to provide the necessary certainty. At this point the competent authority may identify the need to add to or modify the plan in order to adequately protect the European site, and these mitigation measures may be added through the imposition of particular restrictions and conditions.
- 1.15 For plans, the stages of HRA are often quite fluid, with the plan normally being prepared by the competent authority itself. This gives the competent authority the opportunity to repeatedly explore options to prevent impacts, refine the plan and rescreen it to demonstrate that all potential risks to European sites have been successfully dealt with.
- 1.16 When preparing a plan, a competent authority may therefore go through a continued assessment as the plan develops, enabling the assessment to inform the development of the plan. For example, a competent authority may choose to pursue an amended or different option where impacts can be avoided, rather than continue to assess an option that has the potential to significantly affect European site interest features.
- 1.17 After completing an assessment, a competent authority should only adopt a plan where it can be ascertained that there will not be an adverse effect on the integrity of the European site(s) in question. In order to reach this conclusion, the competent authority may have made changes to the plan, or modified the project with restrictions or conditions, in light of their Appropriate Assessment findings.
- 1.18 Where adverse effects cannot be ruled out, further exceptional tests are set out in Regulation 107. In exceptional cases, this allows a plan to be taken forward where there are no 'alternative solutions', where 'imperative reasons of overriding public interest' apply and where compensation can be delivered. It should be noted that meeting these tests is a rare last resort and ordinarily, competent authorities seek to ensure that a plan or project is fully mitigated for, or it does not proceed.
- 1.19 In such circumstances where a competent authority considers that a plan should proceed under Regulations 107, they must notify the relevant Secretary of State. Normally, planning decisions and competent authority duties are then transferred, becoming the responsibility of the Secretary of State, unless on considering the information, the planning authority is

directed by the Secretary of State to make their own decision on the plan or project at the local level. The decision maker, whether the Secretary of State or the planning authority, should give full consideration to any proposed 'overriding reasons' for which a plan or project should proceed despite being unable to rule out adverse effects on European site interest features, and ensure that those reasons are in the public interest and are such that they override the potential harm. The decision maker will also need to secure any necessary compensatory measures, to ensure the continued overall coherence of the European site network if such a plan or project is allowed to proceed. However, it is understood that the Council would not wish to pursue these derogations.

Definitions, references to case law and guidance

- 1.20 This HRA follows principles of case law, both UK and EU. It also refers as appropriate to the Habitats Regulations Assessment Handbook (Tyldesley & Chapman, 2021), to which Footprint Ecology subscribes. We also follow relevant government guidance.
- 1.21 Drawing on the Handbook, other relevant guidance and case law, we clarify the following terms used in the flow chart (Figure 1):
- 1.22 In Stage 1, A '**likely significant effect**' following Waddenzee⁵, is a '*possible significant effect; one whose occurrence cannot be excluded on the basis of objective information*'. It is a low threshold and simply means that there is a risk or doubt regarding such an effect. The screening stage is a preliminary examination, sometimes described as a coarse filter, or following Sweetman, '*a trigger for the obligation to carry out an appropriate assessment*'. There should however be credible evidence to show that there is a real rather than a hypothetical risk of effects that could undermine a site's conservation objectives. This was amplified in the Bagmoor Wind⁶ case where '*if the absence of risk... can only be demonstrated after a detailed investigation, or expert opinion, [then] the authority must move from preliminary examination to appropriate assessment*'.

⁵ Waddenzee: European Courts C-127/02 Waddenzee 7th September 2004, reference for a preliminary ruling from the Raad van State.

⁶ Bagmoor Wind: UK courts Bagmoor Wind v The Scottish Ministers, Court of Session [2012] CSIH 93

- 1.23 Following the People Over Wind judgement⁷, when making screening decisions for the purposes of deciding whether an appropriate assessment is required, competent authorities cannot take into account any mitigation measures.
- 1.24 Stage 2 involves the **appropriate assessment and integrity test**. Here a plan can only be adopted if the competent authority can demonstrate that it will not adversely affect the integrity of the European site. This is precautionary approach and means it is necessary to show the absence of harm.
- 1.25 Following Champion⁸ **'appropriate'** is not a technical term but simply indicates that the assessment needs to be appropriate to the task in hand.
- 1.26 The **integrity** of a European site has been described as the 'coherence of its ecological structure and function, across its whole area, that enables it to sustain the habitat, complex of habitats and/or the levels of populations of the species for which it was classified⁹. An alternative definition, after Sweetman¹⁰, is 'the lasting preservation of the constitutive characteristics of the site'.
- 1.27 In terms of the burden of proof, the HRA of development plans was first made a requirement in the UK following a ruling by the European Court of Justice in EC v UK¹¹. However, the judgement¹² recognised that any assessment had to reflect the actual stage in the strategic planning process and the level of evidence that might or might not be available. This was given expression in the High Court (Feeney)¹³ which stated: "*Each ... assessment ... cannot do more than the level of detail of the strategy at that stage permits*".
- 1.28 The need to consider possible **in-combination** effects arises at stage 1 – the screening and also at stage 2 – the appropriate assessment and integrity test. The effects of the plan in-combination with other plans or projects are the cumulative effects which will or might arise from the addition of the

⁷ People Over Wind: European Court Case C-323/17 People Over Wind & Peter Sweetman v Coillte Teoranta 12 April 2018

⁸ Champion: UK Supreme Court [2015] UKSC 52 22nd July 2015

⁹ Para 20 of the ODPM Circ. 06/2005

¹⁰ Sweetman: European Court C – 258/11 Sweetman 11th April 2013, reference for a preliminary ruling from the Supreme Court of Ireland

¹¹ Commission v UK (C-6/04) [2005] ECR I-9017

¹² Commission of the European Communities v UK Opinion of Advocate General Kokott

¹³ Feeney: Feeney v Oxford City Council [2011] EWHC 2699 (Admin) . 24th October 2011

effects of other relevant plans or projects alongside the plan under consideration. If during the stage 1 screening it is found the subject plan would have no likely effect alone, but might have such an effect in-combination then the appropriate assessment at stage 2 will proceed to consider cumulative effects. Where a plan is screened as having a likely significant effect alone, the appropriate assessment should initially concentrate on its effects alone. Exceptionally, the Wealden decision¹⁴ requires the impacts of air pollution to be considered alone and in-combination.

¹⁴ Wealden District Council v Secretary of State for Communities and Local Government, Lewes District Council and the South Downs National Park Authority (Defendants) and Natural England (Interested Party) [2017] EWHC 351 (Admin).

2. European sites in and around Uttlesford

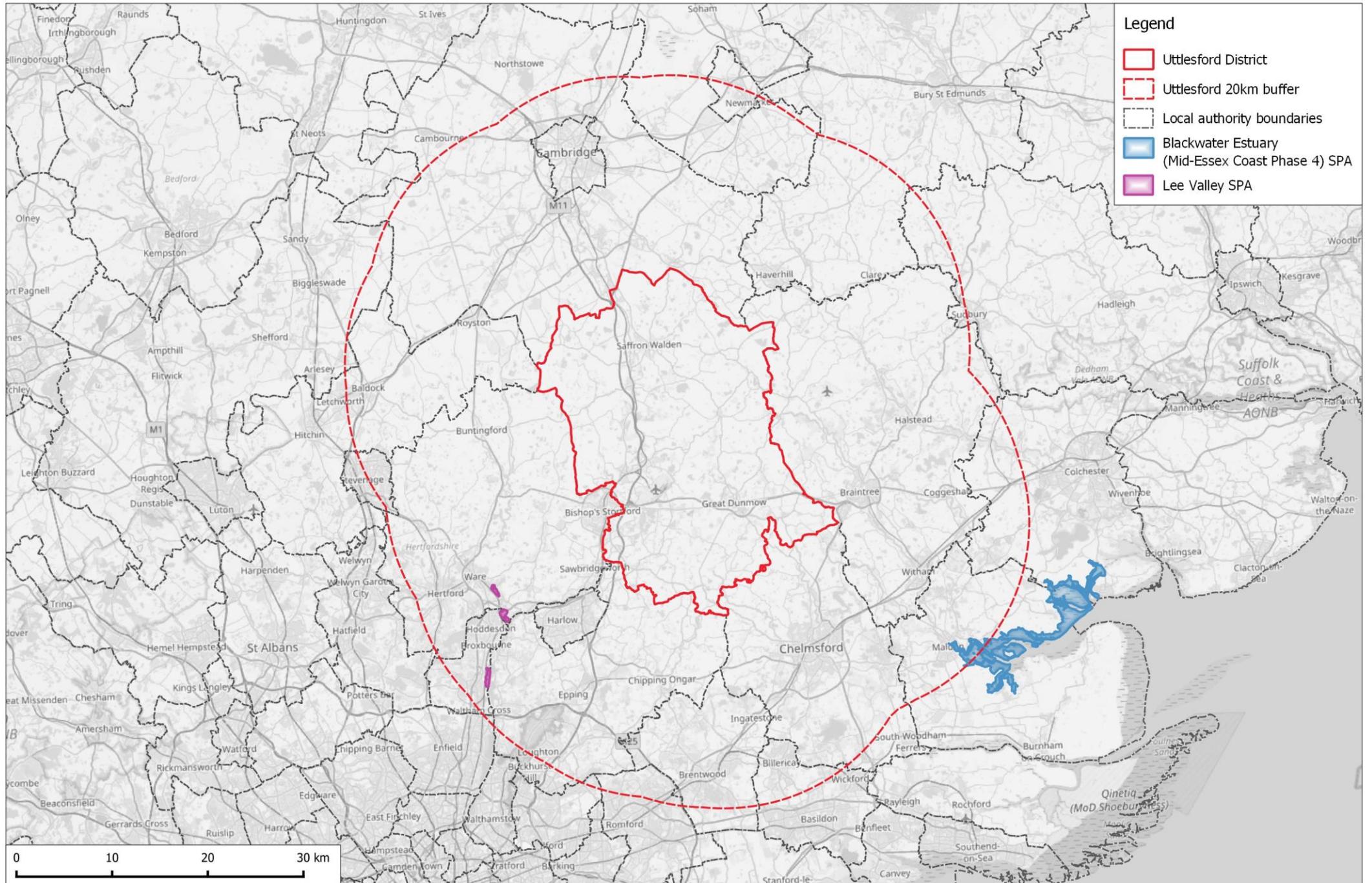
Overview of potentially relevant European sites

- 2.1 We have used 20km from the District boundary as an initial area of search (20km providing a precautionary area of search within which policies could possibly be considered to generate measurable effects).
- 2.2 European sites within 20km are listed in Table 1 and shown in Map 1 (SPAs), Map 2 (SACs) and Map 3 (Ramsar sites).

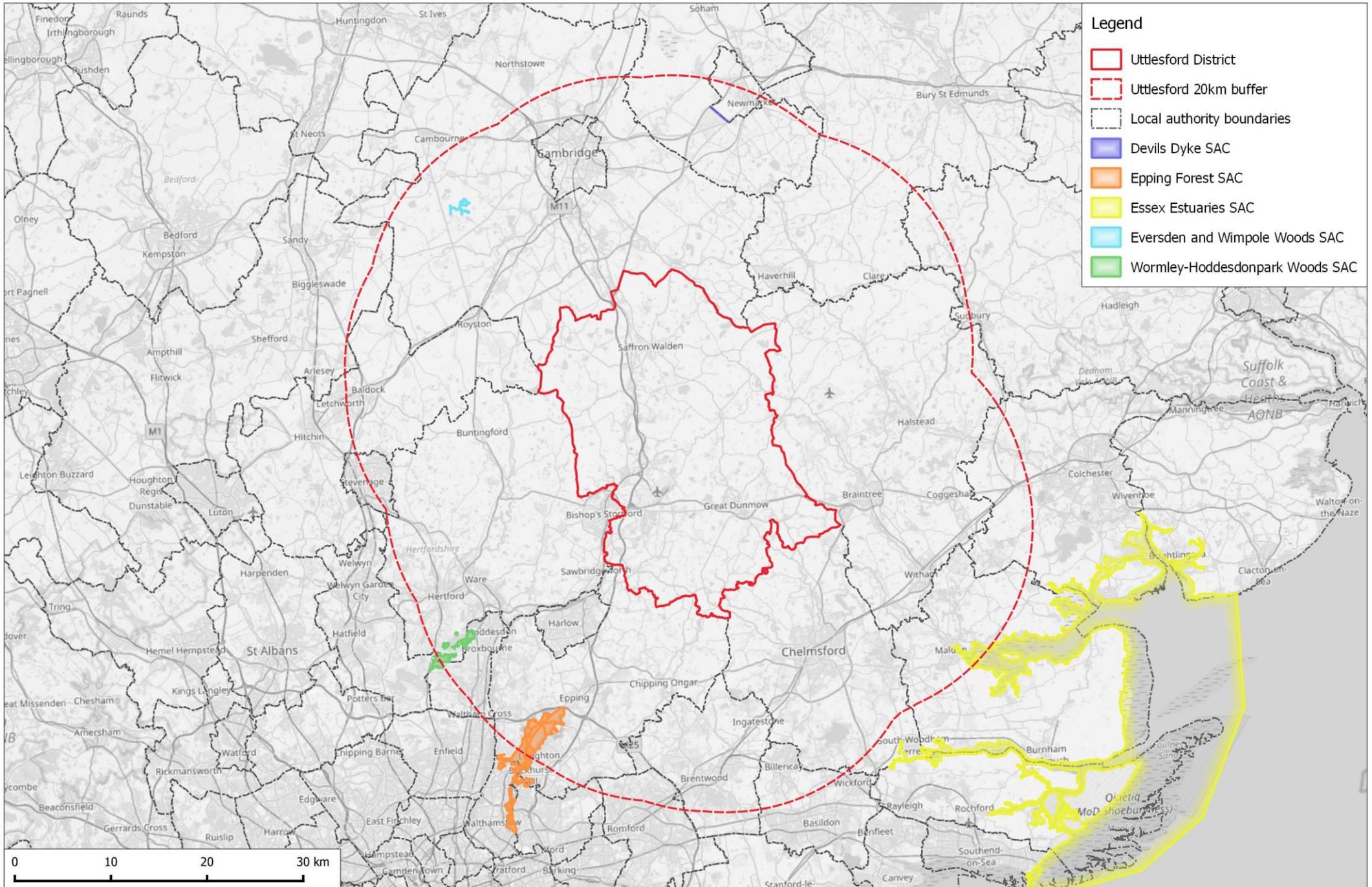
Table 1: European Sites within a 20km radius

SAC	SPA	Ramsar
Devil's Dyke SAC	Blackwater Estuary (Mid Essex Coast Phase 4) SPA	Blackwater Estuary (Mid Essex Coast Phase 4) Ramsar
Epping Forest SAC	Lee Valley SPA	Lee Valley Ramsar
Essex Estuaries SAC		
Eversden & Wimpole Woods SAC		
Wormley – Hoddesdonpark Woods SAC		

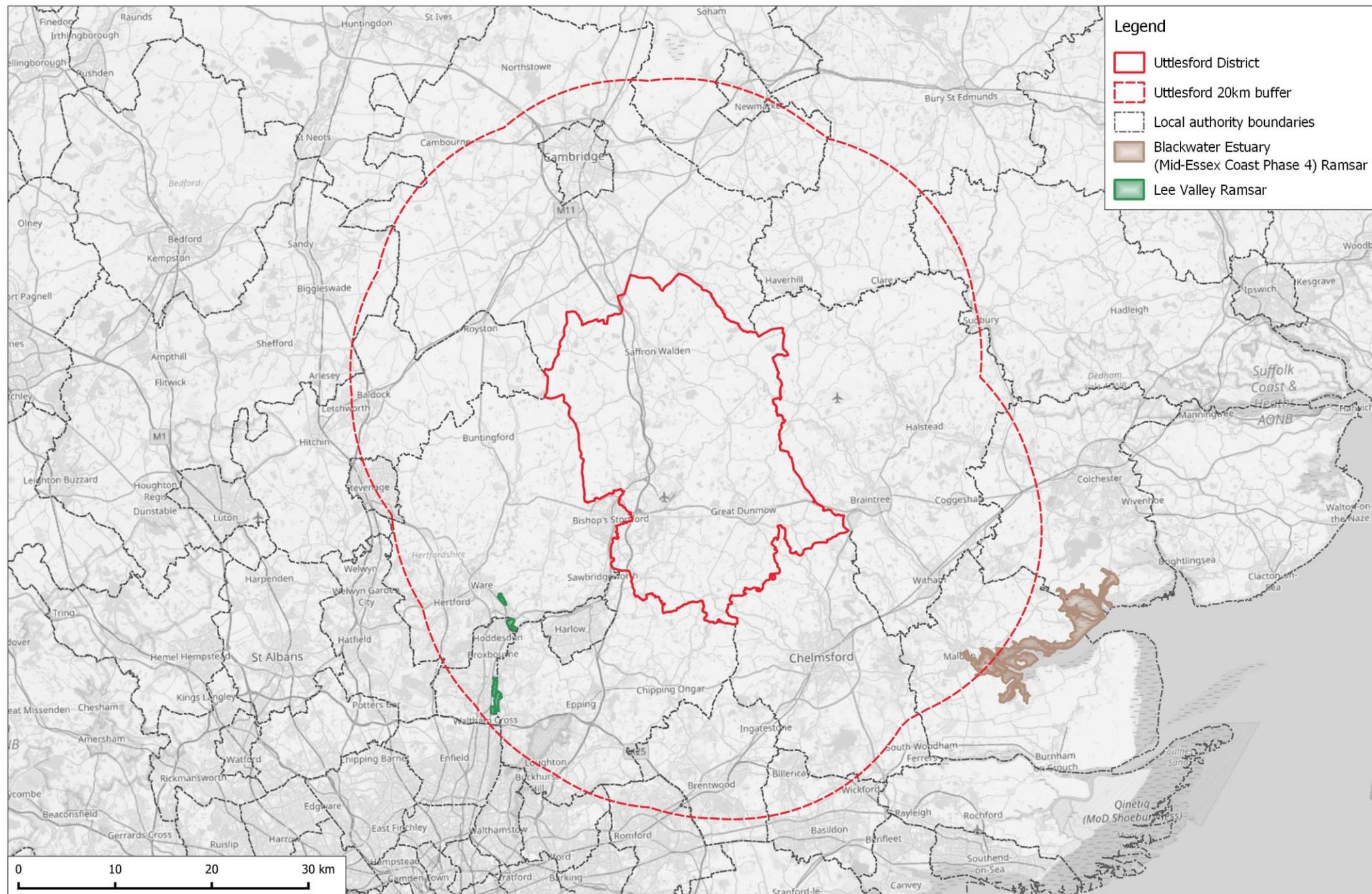
Map 1: Special Protection Areas



Map 2: Special Areas of Conservation



Map 3: Ramsar sites



- 2.3 In assessing the implications of any plan or project on European sites, it is essential to fully understand the ecology and sensitivity of the sites, in order to identify how they may be affected. Appendix 1 summarises the generic conservation objectives for European sites and Appendix 2 provides detail of the relevant sites (as listed in Table 1), listing their qualifying features, describing the sites and providing links to the relevant detailed conservation advice from Natural England.

European sites to be considered in the screening of the plan and relevant impact pathways

- 2.4 Drawing on previous HRA work and the relative sensitivities of the European sites we can identify the European sites and possible impact pathways that could be relevant when formal screening is undertaken. These are set out in Table 2. This takes a precautionary approach but also seeks to be pragmatic and reflect anticipated trends within the Plan, such as the likelihood that new housing numbers will be concentrated around the major settlements. Further information on the nature of these potential impacts is given in section 2.5 et seq.

Table 2: Summary of European sites within 20km, potentially relevant impact pathways for those sites and those that can be eliminated from further consideration (grey shading).

European site	Approx. distance (km) from District	Recreation	Water issues	Air quality	Notes and for grey shaded rows, reasons for elimination from rest of plan
SACs					
Devil's Dyke SAC	16km	✓		✓	<p>A popular walking route and so potentially at risk though 16km from the district boundary. May justify screening but given additional distance to larger settlements, the risk of meaningful increases in visitor numbers is considered low and significant effects unlikely.</p> <p>Though lying in proximity to a major road, it is considered unlikely that large increases in traffic will arise given the distance from residential allocations. While potentially vulnerable to damage from recreation use, recent visitor survey work at the site by Footprint Ecology indicate recreational use is relatively local and does not extend to Uttlesford.</p> <p>Given the absence of 'water-dependent qualifying features', it is considered unlikely that significant effects will arise from an increased use of water resources or the disposal of wastewater.</p>
Epping Forest SAC	12km	✓		✓	<p>A very popular destination for outdoor recreation however visitor surveys (Caals & Liley, 2023; Liley, 2020) indicate visitor use does not extend as far as Uttlesford and the majority (75% of interviewees) lived within a 7km distance of the interview location. As such recreation impacts are not relevant as a pathway.</p> <p>Though lying in proximity to major roads, and despite its sensitivity to air pollution, it is considered unlikely that large increases in traffic will arise given the distance from residential allocations.</p> <p>It is considered unlikely that significant effects will arise from an increased use of water resources or the disposal of wastewater.</p>

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European site	Approx. distance (km) from District	Recreation	Water issues	Air quality	Notes and for grey shaded rows, reasons for elimination from rest of plan
Essex Estuaries SAC	16km	✓	✓		<p>Very popular destination for outdoor recreation. Visitor data for the Blackwater Estuary supports a 22km zone of influence which just clips the southern part of the District. So, the issue may justify screening though dependent on location of new dwellings.</p> <p>It is considered unlikely that significant effects will arise from an increased use of water resources though screening will be required to assess the impact of the disposal of wastewater associated with the projected increase in the residential population.</p>
Eversden & Wimpole Woods SAC	14km	✓			<p>A popular destination for recreation and so potentially at risk, however as it lies some 14km from the district boundary, meaningful increases in visitor numbers is considered low and significant effects unlikely.</p> <p>It is considered unlikely that large increases in traffic will arise given the distance from residential allocations.</p> <p>It is considered unlikely that significant effects will arise from an increased use of water resources or the disposal of wastewater.</p>
Wormley – Hoddesdonpark Woods SAC	16km			✓	<p>Understood to be a less popular visitor destination. Given its distance from the district boundary (and settlements) the risk of significant issues arising is low.</p> <p>Though lying in proximity to a major road, it is considered unlikely that large increases in traffic will arise given the distance from residential allocations.</p> <p>Given the absence of ‘water-dependent qualifying features’, it is considered unlikely that significant effects will arise from an increased use of water resources or the disposal of wastewater.</p>
SPAs					

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European site	Approx. distance (km) from District	Recreation	Water issues	Air quality	Notes and for grey shaded rows, reasons for elimination from rest of plan
Blackwater Estuary (Mid Essex Coast Phase 4) SPA	16km	✓	✓		See Essex Estuaries SAC above.
Lee Valley SPA	11km	✓		✓	A popular destination for outdoor recreation but this complex of artificial wetlands is managed to accommodate both its ecological interest and large numbers of visitors without conflict. Given the distance from the district and potentially relatively low levels of recreation use from Uttlesford, meaningful impacts from development in the district can be ruled out. Though adjacent to busy roads, it is considered unlikely that large increases in traffic will arise given the distance from residential allocations.
Ramsar sites					
Blackwater Estuary (Mid Essex Coast Phase 4) Ramsar	16km	✓	✓		See Essex Estuaries SAC above.
Lee Valley Ramsar	11km	✓		✓	See Lee Valley SPA above.

Recreation

- 2.5 Harmful ecological effects from recreational pressure relate to increased numbers of people living nearby and using sites for recreation. Issues can relate to a range of activities. While activities such as dog walking tend to occur widely, many activities (such as watersports) tend to occur at very specific locations. Impacts vary according to the site, the habitats and species present, the types of recreation use and the volume of visitors. Impacts include trampling, vegetation wear, erosion, increased fire risk (barbeques etc), dog fouling and disturbance.
- 2.6 The most popular destinations can draw in visitors in great numbers from considerable distances. Less popular sites, or those with fewer facilities, have a smaller catchment, fewer visitors and the issue is typically less problematic or at least more localised. Alternatively, some sites managed specifically to encourage large numbers of visitors may be able to tolerate these pressures without experiencing significant harm.
- 2.7 Importantly, whilst individual allocations, unless large and in close proximity to a fragile European site, rarely result in likely significant effects alone from recreation, a number may have a cumulative effect that can result in likely significant effects in-combination. Given the particular draw of the coast, it is the Essex Coast that is the only relevant site with respect to Uttlesford.

Water Issues

- 2.8 Water issues include water quality and water quantity (i.e. water availability), and flood management. Run-off, outflow from sewage treatments and overflow from septic tanks can result in increased nutrient loads and contamination of water courses. Abstraction and land management can influence water flow and quantity, resulting in reduced water availability at certain periods or changes in the flow. Such impacts particularly relate to aquatic and wetland habitats. Accordingly, at a broad level, all European sites are potentially at risk.
- 2.9 Water supply in and around Uttlesford is provided by Affinity Water which has a statutory duty to provide adequate water for a range of purposes. The impact of increased demand for water on European sites has already been addressed by its Water Resources Management Plan (WRMP) which assessed predicted growth to 2080. Even though all the European sites at risk, except Devil's Dyke and Wormley-Hoddesdonpark Woods, support 'water dependent'

qualifying features¹⁵, the WRMP HRA¹⁶ concluded that adequate water supplies were available to allow likely significant effects to be ruled out alone or in-combination on all European sites in question. There is no reason to doubt this conclusion and, therefore, there is no need for any further scrutiny in this HRA (guidance is clear that a competent authority can adopt the reasoning, conclusions or assessment of another competent authority where appropriate; see Tyldesley & Chapman, 2021 for details).

- 2.10 It should be noted, however, that WRMPs are reviewed every five years and Affinity Water is currently undertaking a consultation exercise on the latest edition of its new WRMP. It is anticipated that the production of the WRMP and its HRA will run concurrently with Uttlesford's local plan. Therefore, dependent on the findings of the WRMP HRA, it is possible that this matter will have to be re-visited before the Regulation 19 submission.
- 2.11 Within Uttlesford, the disposal of water is the responsibility of two water companies, Anglian Water and Thames Water. Whilst neither Devil's Dyke nor Wormley - Hoddesdenpark Woods SACs support water-dependent qualifying features, and so can be ruled out of further scrutiny in this HRA, the same cannot be said for Epping Forest, Eversden & Wimpole Woods the Lee Valley and Essex Coast.
- 2.12 However, with the exception of the Essex coast, all proposed development and, it is presumed, all associated wastewater treatment works, appear to lie in catchments separated from these European sites so ruling out the possibility of any harmful impacts from any development associated with the Plan. Consequently, given the local geography, the only European site remaining at risk where likely significant effects cannot be ruled out is the Essex Estuaries SAC and the Blackwater Estuary (Mid Essex Coast Phase 4) SPA/Ramsar. Whilst impacts from each allocation alone can be considered unlikely, it is the risk from the cumulative level of growth (i.e. in-combination) that likely significant effects might be triggered.

Air pollution

- 2.13 Development is typically associated with increased traffic and emissions which can increase the airborne concentration of nitrogen oxides (NO_x) and

¹⁵ UK Technical Advisory Group on the Water Framework Directive (2003). Guidance on the Identification of Natura Protected Areas (Final). TAG Work Programme Task 4. A – Identification of Natura Protected Areas. 1 – 20.

¹⁶ Affinity Water (2019). Draft Final Water Resources Management Plan 2020-2080. Technical Report: 4.12 Habitats Regulations Assessment.

ammonia (NH₃), and the subsequent rate of nitrogen deposition from the atmosphere. This can lead to the nutrient enrichment and acidification of soils, encouraging more tolerant ruderal species at the expense of sensitive plant, lower plant and invertebrate communities. In high concentrations, ammonia can result in direct toxic effects on vegetation, a factor which may also be true of NO_x. Furthermore, it can exacerbate the effects of other factors such as climate change or pathogens, for example. In contrast, larger animals, such as small mammals and birds are considered immune to direct effects but can be vulnerable to change in their supporting habitats.

2.14 However, levels of nitrogen deposition fall quickly in the first few metres from the roadside before gradually levelling out; beyond 200m, they become difficult to distinguish from background levels. In other words, impacts at 10m, 50m or 200m can be very different from those at the roadside. Importantly, and building on case law in Sussex (the Wealden case)¹⁷, the assessment of air pollution must be undertaken in-combination with plans and projects in neighbouring authorities and further afield.

2.15 It can be seen, therefore, that the additional contributions that might arise from increased traffic are only likely to be significant where a European site lies within 200m of a road which is expected to experience an increase of traffic, and where a feature is known to be sensitive to such effects. Such relatively simple tests essentially represent the scope of a screening assessment leaving more detailed analysis and its relationship to the ecological characteristics of the European sites at risk to the appropriate assessment, should any European sites fall into the above categories.

2.16 Table 4 (Appendix 3) shows that all allocations lie a minimum of 20.7km from Devil's Dyke, 23.5km from Epping Forest 27km from the Essex Estuaries, 24.5km from Eversden & Wimpole Woods, 23.1km from Wormley - Hoddesdonpark Woods and 18.5km from the Lee Valley. Therefore, it can be seen that all lie a considerable distance, a minimum of 18.5km from any development associated with the Plan.

2.17 Measurable air quality impacts at the local plan level are considered to be restricted to a 10km radius from their source (Chapman & Kite, 2021). Therefore, given the distances involved, it is considered there is no credible risk that the conservation objectives of the European sites could be

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

undermined and, therefore, there is no risk of harmful impacts. Therefore, there is no need for screening and no need for any further scrutiny in this HRA.

- 2.18 In saying this, account has been taken of the potential vulnerability of Epping Forest SAC to road traffic emissions. However, confidence in this outcome can be drawn from Natural England's evidence to Epping Forest District Council local plan Examination in Public that the threat posed by air pollution is likely to be generated from within Epping Forest District and not adjacent authorities.

Outcomes

- 2.19 Mindful of these limitations, it is considered potentially harmful impacts from air pollution and the use of water resources can be ruled out prior to the need for screening. In contrast, the impact of recreational pressure on the complex of European sites along the Essex coast will require screening. The latter may also be vulnerable to the disposal of wastewater associated with the growing population of the district.

3. Screening the Local Plan for Likely Significant Effects

- 3.1 This section documents the screening stage of HRA (stage 1 of the 4 stage 'process), where the plan is screened for likely significant effects.
- 3.2 The screening for likely significant effects of a plan involves checking all aspects of the plan and identifying any areas of potential concern, which are then examined in more detail in the appropriate assessment (stage 2) of the HRA. The check for likely significant effects provides an initial test of the plan. It is undertaken to enable the plan maker as competent authority to do two things. Firstly, it narrows down and highlights those elements of the plan that may pose a risk to European sites. Secondly, where an option poses a risk but is a desired element of the plan, the screening exercise identifies where further assessment is necessary in order to determine the nature and magnitude of potential impacts on European sites and what could be done to avoid, cancel, reduce or eliminate those risks. Further assessment and evidence gathering after early screening may include, for example, the commissioning of additional survey work, modelling, researching scientific literature or setting out justifications in accordance with expert opinion.

What constitutes a likely significant effect?

- 3.3 Where the screening identifies risks that cannot be avoided with simple clarifications, corrections or instructions for project level HRA, a more detailed assessment is undertaken to gather more information about the likely significant effects and give the necessary scrutiny to potential mitigation measures. This is the appropriate assessment stage of HRA.
- 3.4 A likely significant effect could be concluded on the basis of clear evidence of risk to European site interest, or there could be a scientific and plausible justification for concluding that a risk is present, even in the absence of direct evidence. The latter is an example of the precautionary approach, which is embedded through the HRA process. The precautionary principle should be applied at all stages in the HRA process and follows the principles established in domestic and EU case law.

- 3.5 The screening in this report looks at policies prior to any avoidance/reduction/mitigation measures in line with People Over Wind¹⁸; mitigation can only be considered at Appropriate Assessment stage. People Over Wind clarified the need to carefully explain actions taken at each HRA stage, particularly at the screening for likely significant effects stage. The Judgment highlights the need for clear distinction between the stages of HRA, and good practice in recognising the function of each. The screening for likely significant effects stage should function as a screening or checking stage (regardless of avoidance, reduction/mitigation measures), to determine whether further assessment is required. Assessing the nature and extent of potential impacts on European site interest features, and the robustness of mitigation options, should be done at the appropriate assessment stage.

The screening

- 3.6 Map 4 shows the likely allocations within the Plan.
- 3.7 The screening for likely significant effects within Table 3 below provides the screening at this stage in the plan-making. The screening covers the whole plan. Where risks are highlighted and there is a possibility of significant effects on European sites, further and more detailed appropriate assessment will be required. Inevitably there will be precaution in screening elements of the plan, as the purpose of screening for likely significant effects is to identify where there is either no possibility of an effect, or where there are uncertainties.
- 3.8 Appendix 3 summarises the distances from each allocation site to European sites, providing further context and background on the distances involved.

¹⁸ People Over Wind: European Court Case C-323/17 People Over Wind & Peter Sweetman v Coillte Teoranta 12 April 2018

Map 4 - Allocations

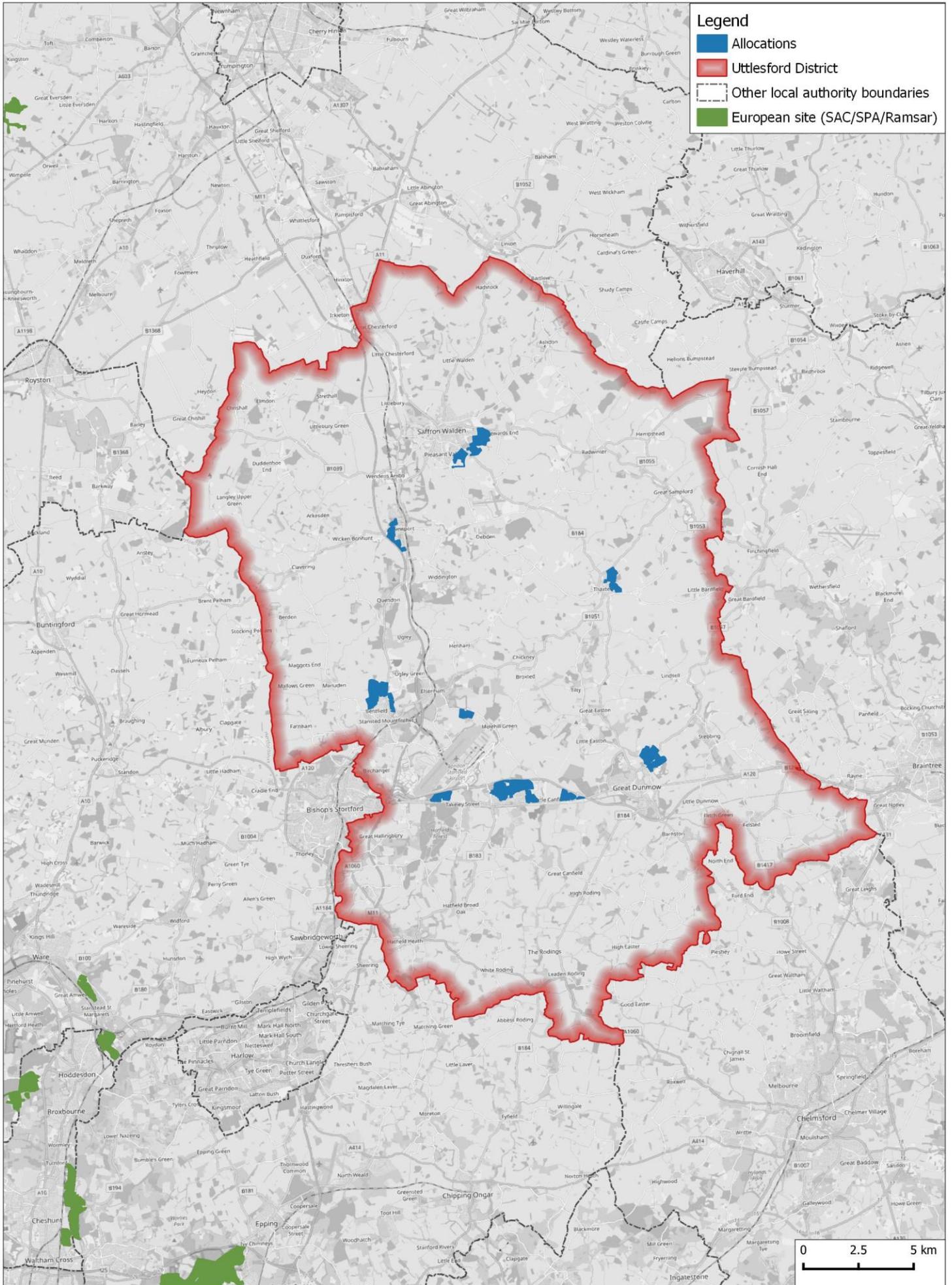


Table 3: Initial screening of the Uttlesford District Plan for likely significant effects. Orange shaded rows with bold text indicates policies that are screened in alone or in-combination. Grey shading indicates chapter headings/sections.

Plan section/policy	Description	Initial LSE screening	Potential risks	Comments
Chapter 1: Introduction	Introductory text and outline of the plan.	Introductory text. No LSE.		
Chapter 2: Spatial Portrait	Outlines the current characteristics of the district and overarching vision for future developments.	Introductory text. No LSE.		
Chapter 3: Spatial Vision and Strategic Objectives	States the environmental, economic and community/social objectives of the local plan.	Strategic text. No LSE.		
Chapter 4: Spatial Strategy	States the characteristics and broad objectives of future development by area.	Strategic text. No LSE.		
Core Policy 1: Addressing Climate Change	General criteria for developments to support an overall reduction in greenhouse gases.	General criteria for development proposals. No LSE.		
Core Policy 2: Meeting Our Housing Needs	Allocations.	LSE. Screened in.	Disposal of wastewater in-combination and recreation (Essex Estuaries SAC/Blackwater Estuary (Mid Essex Coast Phase 4) SPA)	Exact housing delivery estimated to total 14,356 new dwellings. Likely significant effects in-combination cannot be ruled out.
Core Policy 3: Settlement Hierarchy	Describes the classification of settlements, according to the character, services, employment opportunities and facilities of that community.	General policy. No LSE.		
Core Policy 4: Meeting Business and Employment needs	Allocations.	LSE. Screened in.	Disposal of wastewater in-combination and recreation (Essex Estuaries SAC/Blackwater Estuary (Mid Essex Coast Phase 4) SPA/Ramsar)	A total of 33ha of land has been provided for business and employment development. Likely significant effects in-

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Plan section/policy	Description	Initial LSE screening	Potential risks	Comments
				combination cannot be ruled out.
Core Policy 5: Providing Supporting Infrastructure and Services	New developments will be required to contribute to the delivery of new infrastructure where appropriate.	General policy. No LSE.		
Chapter 5: North Area Strategy	Introductory text about the current and future needs for housing, education and business development in the North Uttlesford area.	Strategic text. No LSE.		
Core Policy 6: North Uttlesford Area Strategy	Allocations.	LSE. Screened in.	Disposal of wastewater in-combination and recreation (Essex Estuaries SAC/Blackwater Estuary (Mid Essex Coast Phase 4) SPA/Ramsar)	1,692 new dwellings to be delivered at allocated sites near both Newport and Saffron Waldon. Likely significant effects in-combination cannot be ruled out.
Core Policy 7: Delivery of Transport Schemes within the North Uttlesford Area	Policy to enhance existing public transport routes, active travel routes and highway infrastructure.	General policy. No LSE.		Policy likely to be supported by Local Transport and Connectivity Plan developed by Essex County Council.
Core Policy 8: Safeguarding of Land for Strategic Transport Schemes in the North Uttlesford Area	Proposals for development will consider the delivery of transport schemes and will only be granted where construction or operation of transport scheme will not be affected.	General criteria for development proposals. No LSE.		
Core Policy 9: Green and Blue Infrastructure in the North Uttlesford Area	Development proposals must support the enhancement of green and blue infrastructure projects.	General policy that could not lead to development. No LSE.		
Chapter 6: South Area Strategy	Introduction to the housing and economic needs of South Uttlesford.	Strategic text. No LSE.		

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Plan section/policy	Description	Initial LSE screening	Potential risks	Comments
Core Policy 10: South Uttlesford Area Strategy	Allocations.	LSE. Screened in.	Disposal of wastewater in-combination and recreation (Essex Estuaries SAC/Blackwater Estuary (Mid Essex Coast Phase 4) SPA/Ramsar)	A total of 2,895 dwellings have been allocated across Takeley/Little Canfield, Stansted Mountfitchet and Great Dunmow. Likely significant effects in-combination cannot be ruled out.
Core Policy 11: London Stansted Airport	Policy states that continued use of the airport will be supported. Any development will not impact aircraft safety and will have suitable mitigation measures in place (e.g., noise, air, health) if in close proximity.	General policy. No LSE.		Increased air traffic could have implications for some European sites such as Epping Forest, However, policy is general and no specific allocations or increases in aircraft traffic referred to.
Core Policy 12: Stansted Airport Countryside Protection Zone	Policy states that development around the airport is restricted to protect rural character, with few exceptions.	General policy that could not lead to development. No LSE.		
Core Policy 13: Delivery of Transport Schemes within the South Uttlesford Area	Policy focuses on enhancing public transport network in addition to development of more active travel routes.	General policy. No LSE.		
Core Policy 14: Safeguarding of Land for Strategic Transport Schemes in the South Uttlesford Area	Policy to ensure land is safeguarded for the delivery of transport schemes in South Uttlesford, ensuring development proposals do not prejudice construction or operation of such schemes.	General criteria for development proposals. No LSE.		
Core Policy 15: Green and Blue Infrastructure in the South Uttlesford Area	Policy to protect the green and blue infrastructure projects in the South Uttlesford area and identifies	General policy that could not lead to development. No LSE.		

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Plan section/policy	Description	Initial LSE screening	Potential risks	Comments
	projects for which the Council are responsible.			
Chapter 7: Thaxted Area Strategy	Introductory text outlining Thaxted's position as a thriving Rural Centre, and the housing and economic needs of the area.	Strategic text. No LSE.		
Core Policy 16: Thaxted Area Strategy	Allocations.	LSE. Screened in.	Disposal of wastewater in-combination and recreation (Essex Estuaries SAC/Blackwater Estuary (Mid Essex Coast Phase 4) SPA/Ramsar)	A total of 489 dwellings have been allocated in the town. Likely significant effects in-combination cannot be ruled out.
Core Policy 17: Delivery of Transport Schemes in the Thaxted Area	Policy stating that active travel routes will be upgraded and access to public transport enhanced.	General criteria for development proposals. No LSE.		
Core Policy 18: Delivery of Green and Blue Infrastructure in the Thaxted Area	Strategic text for developments to support the delivery of green and blue infrastructure. Outline of such projects by Council in the Thaxted area.	General policy that could not lead to development. No LSE.		
Chapter 8: Rural Area Strategy	Strategic text on the settlement hierarchy across Uttlesford's rural areas.	Strategic text. No LSE.		
Core Policy 19: Rural Area Housing Requirement Figures	Outlines the distribution of housing requirements across the rural village centres.	LSE. Screened in	Disposal of wastewater in-combination and recreation (Essex Estuaries SAC/Blackwater Estuary (Mid Essex Coast Phase 4) SPA/Ramsar)	Larger villages includes Felsted which is within the zone of influence for the Blackwater Estuary.
Core Policy 20: Affordable Housing on Rural Exception Sites	Policy outlines the criteria for affordable housing developments to be permitted.	General criteria for development proposals. No LSE.		

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Plan section/policy	Description	Initial LSE screening	Potential risks	Comments
Development Policy 1: New Dwellings in the Countryside	Criteria for new dwellings in rural settlements, to ensure they will be in accordance with character, setting and design of the settlement.	General criteria for development proposals. No LSE.		
Development Policy 2: Replacement of a Dwelling in the Countryside	Criteria for replacement dwellings in rural settlements.	General criteria for development proposals. No LSE.		
Development Policy 3: Agricultural/Rural Workers' Dwellings in the Countryside	Criteria to support the development of rural workers' dwellings to assist the running of businesses.	General criteria for development proposals. No LSE.		
Development Policy 4: Extensions to Dwellings in the Countryside	Policy that generally supports the extensions of dwellings in the countryside, however, outlines criteria in which proposals would not be supported.	General criteria for development proposals. No LSE.		
Development Policy 5: Change of Use of Agricultural Land to Domestic Gardens	Policy stating that change of agricultural land to domestic gardens would likely be supported.	General policy that could not lead to development. No LSE.		
Core Policy 21: Rural Diversification	Criteria to determine when proposals for economic activity that bring about rural diversification shall be permitted	General criteria for development proposals. No LSE		
Chapter 9: Climate, Environment and Transport	Introductory text that explains the requirement of local authorities to address climate change.	Strategic text. No LSE.		

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Plan section/policy	Description	Initial LSE screening	Potential risks	Comments
Core Policy 22: Net Zero Operational Carbon Development	Policy stating the renewable energy requirements for new developments.	General policy that could not lead to development. No LSE.		
Core Policy 23: Overheating	States the need for developers to produce a Climate Change and Sustainability Statement.	General criteria for development proposals. No LSE.		
Core Policy 24: Embodied Carbon	Policy sets out targets for Whole Life Carbon Assessment, to be undertaken by developers.	General criteria for development proposals. No LSE.		
Core Policy 25: Renewable Energy Infrastructure	Policy states that the Council will support renewable energy network development, provided any adverse effects are addressed.	General criteria for development proposals. No LSE.		
Core Policy 26: Providing for Sustainable Transport and Connectivity	Criteria for developments to support the Essex Local Transport Plan, improving existing transport infrastructure and promoting active travel.	General criteria for development proposals. No LSE.		
Core Policy 27: Assessing the impact of Development on Transport Infrastructure	Policy stating developments will be required to produce a Travel Plan, considering access to public transport and sustainable travel following these criteria.	General criteria for development proposals. No LSE.		
Core Policy 28: Active Travel – Walking and Cycling	Development should be planned around active travel routes, using the criteria outlined in this policy.	General criteria for development proposals. No LSE.		
Core Policy 29: Electric and Low Emission Vehicles	Responsibility of the developers to maximise provision of electric	General policy that could not lead to development. No LSE.		

U t t l e s f o r d D i s t r i c t D r a f t L o c a l P l a n 2 0 4 1 H R A R e p o r t

Plan section/policy	Description	Initial LSE screening	Potential risks	Comments
	transport vehicles, by access to both home and public charging facilities.			
Core Policy 30: Public Rights of Way	Development sites close to a Public Right of Way network must demonstrate how the development will enhance or protect it.	General policy that could not lead to development. No LSE.		
Core Policy 31: Parking Standards	Development proposals will consider the latest Essex Parking Standards and Uttlesford Design Code.	General policy that could not lead to development. No LSE.		
Core Policy 32: The Movement and Management of Freight	Development proposals should consider the impact, management and mitigation of freight movement, home deliveries and servicing.	General policy that could not lead to development. No LSE.		
Core Policy 33: Managing Waste	The Local Authority will consider the schemes within this policy to meet waste reduction and recycling targets. Policy states that new developments will include adequate recycling facilities.	General policy that could not lead to development. No LSE.		
Core Policy 34: Water Supply And Protection Of Water Resources	Policy requires development proposals to demonstrate how they will maximise water efficiency, contribute positively to the surface and groundwater sources and will not contaminate these water bodies.	General policy that could not lead to development. No LSE.		
Core Policy 35: Chalk Streams Protection and Enhancement	Development will not be permitted within the buffer zone of the chalk streams identified in this policy.	General criteria for development proposals. No LSE.		
Core Policy 36: Flood Risk	Describes how development proposals should address flood risk	General criteria for development proposals. No LSE		

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Plan section/policy	Description	Initial LSE screening	Potential risks	Comments
	including requirements for new development			
Core Policy 37: Sustainable Drainage Systems	Policy required all major development to use SuDS and sets out details of requirements	General criteria for development proposals. No LSE		
Core Policy 38: The Natural Environment	Describes protection for the Natural Environment including requirements for mitigation	LSE. Screened in.	Policy describes mitigation requirements for the Essex Coast with respect to recreation.	In line with People vs Wind, mitigation measures need to be considered as part of appropriate assessment
Core Policy 39: Green and Blue Infrastructure	Policy outlines criteria to consider green and blue infrastructure in development.	General criteria for development proposals. No LSE		
Core Policy 40: Biodiversity	Development proposals will adhere to the 20% net gain in biodiversity and must conserve or enhance ecological networks.	General policy that could not lead to development. No LSE.		
Core Policy 41: Landscape Character	Development proposals should enhance and preserve the landscape character and appearance and be supported by a Landscape and Visual Impact Assessment.	General policy that could not lead to development. No LSE.		
Core Policy 42: Pollution and Contamination	Development proposals must consider the potential impacts of pollutants. Permission will be granted where there is no threat to the public health and safety, or adverse impact to local ground and surface water.	General criteria for development proposals. No LSE.		
Core Policy 43: Air Quality	Development proposals will complete an air quality assessment to ensure the criteria outlined within	General criteria for development proposals. No LSE.		

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Plan section/policy	Description	Initial LSE screening	Potential risks	Comments
	this policy are met, to ensure there are no significant adverse effects from emissions to air.			
Core Policy 44: Noise	Policy outlines how noise should be managed, reduced and mitigated against by development proposals.	General policy that could not lead to development. No LSE.		
Chapter 10: Employment and Retail	Outlines the policies within this chapter.	Strategic text. No LSE.		
Core Policy 45: Protection of Existing Employment Space	Criteria for development of employment land in the district. Existing employment space will be safeguarded.	General criteria for development proposals. No LSE.		
Core Policy 46: Development at Allocated Employment Sites	All sites identified for employment will be safeguarded unless demonstrated otherwise in a district wide Employment Land Review.	General policy that could not lead to development. No LSE.		
Core Policy 47: Ancillary Uses on Existing or Allocated Employment Sites	Criteria for permissive alternative use of allocated employment sites.	General policy that could not lead to development. No LSE.		
Core Policy 48: New Employment Development on Unallocated Sites	Policy states the criteria for development proposals on unallocated employment sites, in Key Settlements, Local Rural Centres, Larger Villages and Small Villages.	General criteria for development proposals. No LSE.		
Core Policy 49: Employment and Training	Policy states that the Council will support employment and training schemes and requires large-scale developments to include an Employment and Skills Plan that is site-specific.	General criteria for development proposals. No LSE.		

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Plan section/policy	Description	Initial LSE screening	Potential risks	Comments
Core Policy 50: Retail and Main Town Centre Uses Hierarchy	The Council will support the long-term vitality and viability of its existing Town Centre's.	General statement of policy. No LSE		
Development Policy 6: Hot Food Takeaways	Policy states that hot food takeaway proposals will not be supported unless supported by a Health impact Assessment.	General criteria for development proposals. No LSE.		
Development Policy 7: New Shops or Cafes in Smaller Settlements	Policy sets out criteria for extensions or development to small shops/cafes within small settlements.	General criteria for development proposals. No LSE.		
Core Policy 51: Tourism and the Visitor Economy	Developments that advance the tourism and visitor economy will be encouraged.	General criteria for development proposals. No LSE.		
Development Policy 8: Tourist Accommodation	Policy states criteria for permitting self-catering tourist accommodation.	General criteria for development proposals. No LSE.		
Chapter 11: Building Healthy and Sustainable Communities	Outlines the policies within this chapter.	Strategic text. No LSE.		
Core Policy 52: Good Design Outcomes and Process	Policy outlines the need for development proposals to adhere to the design principles and guidance set out in national policy.	General criteria for development proposals. No LSE.		
Development Policy 9: Public Art	Major developments are expected to contribute to public art projects that benefit the local community.	Strategic text. No LSE.		
Core Policy 53: Standards for New Residential Development	Strategic policy that states the need for a mix of housing in communities.	General policy that could not lead to development. No LSE.		

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Plan section/policy	Description	Initial LSE screening	Potential risks	Comments
Core Policy 54: Specialist Housing	Specialist housing will be in suitable locations, with access to community facilities and public transport.	General criteria for development proposals. No LSE.		
Core Policy 55: Residential Space Standards	New dwellings will comply with national residential space requirements (internal and external).	General policy that could not lead to development. No LSE.		
Core Policy 56: Affordable Dwellings	New residential developments should provide affordable dwellings, distributed throughout the development.	General criteria for development proposals. No LSE.		
Core Policy 57: Sub-Division of Dwellings and Homes in Multiple Ownership	Policy states criteria for supporting multiple occupancy homes in development.	General criteria for development proposals. No LSE.		
Core Policy 58: Custom and Self-Build Housing	Policy outlines the criteria for self-build custom plots.	General criteria for development proposals. No LSE.		
Core Policy 59: The Metropolitan Green Belt	The Metropolitan Green belt will be maintained, and development within the green belt will be assessed in accordance government policy.	General policy that could not lead to development. No LSE.		
Core Policy 60: The Travelling Community	Criteria for accommodation proposals for the Gypsy, Traveller and Travelling Show people community.	General criteria for development proposals. No LSE.		Note that the policy numbering is incorrect within the Chapter from this point onwards (Jumps from 59 to 61). Numbers given are consistent with Excel sheet shared from UDC.
Core Policy 61: Transit Sites	Outlines the criteria to approve proposals of transit sites.	General criteria for development proposals. No LSE.		

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Plan section/policy	Description	Initial LSE screening	Potential risks	Comments
Core Policy 62: The Historic Environment	All development proposals should conserve and enhance the character of Uttlesford’s historic environment.	General criteria for development proposals. No LSE.		
Core Policy 63: Design of Development Within Conservation Areas	Criteria stating that developments within a Conservation Area must conserve or enhance the site-specific interest, setting or character.	General criteria for development proposals. No LSE.		
Core Policy 64: Development Affecting Listed Buildings	Policy states criteria for changes to listed buildings would be permitted.	General criteria for development proposals. No LSE.		
Core Policy 65: Non-Designated Heritage Assets of Local Importance	Developments that have adverse effects to heritage assets of local interest will be refused, only permitting those in keeping with the character and local significance.	General criteria for development proposals. No LSE.		
Core Policy 66: Planning of Health	Policy sets out how proposals will be expected to reduce health inequalities, promote healthier lifestyles and improve the health and wellbeing of communities	General criteria for development proposals. No LSE.		
Core Policy 67: Open Space	Policy sets out requirements and standards for the provision of open space for sport and recreation	General criteria for development proposals. No LSE.		
Core Policy 68: Community Uses	Policy provides the basis for the protection of existing community uses and the requirements to provide additional community uses in tandem with new development.	General criteria for development proposals. No LSE.		
Core Policy 69: New Cemeteries and Burial Space	Policy sets criteria for proposals for new cemeteries and burial grounds	General criteria for development proposals. No LSE.		

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Plan section/policy	Description	Initial LSE screening	Potential risks	Comments
Core Policy 70: Communications Infrastructure	Policy requires proposals will to demonstrate how high-speed broadband infrastructure, and other communications infrastructure, will be provided in time for occupation of the development.	General criteria for development proposals. No LSE.		
Chapter 12: Monitoring	States the responsibility of the Council to successfully implement the Plan and policies, including the provision of land to meet development demand.	General policy. No LSE.		
Core Policy 66: Monitoring and Implementation	A monitoring report will be produced annually to ensure the Plan and Monitoring Framework are being executed effectively.	General policy. No LSE.		

Screening conclusions

- 3.9 The initial screening of the draft plan has identified potential risks relating to the disposal of wastewater and for recreation. Likely significant effects were identified in-combination for the Essex Estuaries SAC/Blackwater Estuary (Mid Essex Coast Phase 4) SPA/Ramsar in relation to both the disposal of wastewater and for recreation and the following policies:
- Core Policy 2: Meeting Our Housing Needs
 - Core Policy 4: Meeting Business and Employment needs
 - Core Policy 6: North Uttlesford Area Strategy
 - Core Policy 10 South Uttlesford Area Strategy
 - Core Policy 16: Thaxted Area Strategy
- 3.10 In addition, Core Policy 37 sets out mitigation requirements with respect to recreation and the Blackwater Estuary (Mid Essex Coast Phase 4) SPA/Ramsar.
- 3.11 These policies will need to be considered in detail at appropriate assessment and later stages of the document set out the current understanding and highlight further evidence that will need to be gathered as the Plan progresses. The Regulation 19 version of the Plan will be subject to a complete rescreening and updated appropriate assessment.

4. Appropriate Assessment Topic: Recreation

Relevant policies from LSE screening

4.1 Screening identified likely significant effects in relation to recreation impacts and the Essex Estuaries SAC/Blackwater Estuary (Mid Essex Coast Phase 4) SPA/Ramsar for the following policies in-combination with other elements of plan and other plans/projects:

- Core Policy 2: Meeting Our Housing Needs;
- Core Policy 4: Meeting Business and Employment needs;
- Core Policy 6: North Uttlesford Area Strategy;
- Core Policy 10 South Uttlesford Area Strategy;
- Core Policy 16: Thaxted Area Strategy;
- Core Policy 19: Rural Area Housing Requirement Figures.

4.2 Policies were screened in the absence of mitigation and mitigation measures are set out in the following policy, which in accordance with People vs Wind need to be considered at appropriate assessment:

- Core Policy 38: the Natural Environment

Background

4.3 In the UK there is considerable overlap between nature conservation and recreation. Many of our most important nature conservation sites have legal rights of access, for example through Public Rights of Way or Open Access through the Countryside and Rights of Way Act (CRoW) 2000. People are often drawn to sites that are important for nature conservation as they are large, scenic and often few other alternatives exist. Recreation use can include a variety of activities, ranging from the daily dog walks to competitive adventure and endurance sports. There can be a difficult balancing act between providing for an increasing demand for access without compromising the integrity of protected wildlife sites.

4.4 There is now a strong body of evidence showing how increasing levels of access can have negative impacts on wildlife. Visits to the natural environment have shown a significant increase in England as a result of the increase in population and a trend to visit more (O'Neill, 2019). The issues are particularly acute in southern England, where population density is highest. Issues are varied and include disturbance, increased fire risk, contamination and damage (for general

reviews see: Liley et al., 2010; Lowen et al., 2008; Ross et al., 2014; Underhill-Day, 2005).

- 4.5 The issues are not however straightforward. It is now increasingly recognised that access to the countryside is crucial to the long term success of nature conservation projects, for example through enforcing pro-environmental behaviours and a greater respect for the world around us (Richardson et al., 2016). Access also brings wider benefits to society that include benefits to mental/physical health (Keniger et al., 2013; Lee & Maheswaran, 2011; Pretty et al., 2005) and economic benefits (ICF GHK, 2013; ICRT, 2011; Keniger et al., 2013; The Land Trust, 2018). Nature conservation bodies are trying to encourage people to spend more time outside and government policy is also promoting countryside access in general (e.g. through enhancing coastal access).

Disturbance to birds and the Essex Coast

Bird disturbance

- 4.6 Disturbance has been identified by Natural England as a generic issue across many SPAs (see Coyle & Wiggins, 2010), and can be an issue for a range of species.
- 4.7 Disturbance to wintering and passage waterfowl can result in:
- A reduction in the time spent feeding due to repeated flushing/increased vigilance (Bright et al., 2003; Fitzpatrick & Bouchez, 1998; Stillman & Goss-Custard, 2002; Thomas et al., 2003; Yasué, 2005)
 - Increased energetic costs (Nolet et al., 2002; Stock & Hofeditz, 1997)
 - Avoidance of areas of otherwise suitable habitat, potentially using poorer quality feeding/roosting sites instead (N. H. Burton et al., 2002; N. H. K. Burton et al., 2002; Cryer et al., 1987; Gill, 1996)
 - Increased stress (Regel & Putz, 1997; Thiel et al., 2011; Walker et al., 2006; Weimerskirch et al., 2002).
- 4.8 Disturbance can have additional impacts for breeding birds and for breeding gulls and terns, impacts of recreation can include reduced breeding success (Medeiros et al., 2007; Robert & Ralph, 1975; Sandvik H & Barrett, 2001).

The Essex Coast and the RAMS

- 4.9 The Mid-Essex Coast comprises an extensive complex of estuaries and intertidal sand and silt flats, including several islands, shingle and shell beaches and extensive areas of saltmarsh. There are 5 Mid-Essex Coast SPAs, classified in a phased approach to recognise the ecological linkages between them. These SPAs

support a diverse range of species that include internationally important populations of breeding birds, as well as internationally important assemblages of wintering waterfowl, present in both nationally and internationally important numbers. Each individual site has its own conservation objectives and conservation advice package.

- 4.10 In recognition of the issues relating to increased recreation from local housing growth and impacts to the Essex Coast, relevant local planning authorities have produced a Supplementary Planning Document (SPD). The SPD focuses on the mitigation that is necessary to protect the birds of the Essex coast and their habitats from the increased visitor pressure associated with new residential development. It accompanies the strategic approach to mitigation which is set out in the Essex Coast Recreational disturbance Avoidance and Mitigation Strategy (the 'RAMS').
- 4.11 The RAMS highlights the relevant zones of influence for the different SPA sites along the Essex Coast, with these zones reflecting the areas where additional residential housing growth will have likely significant effects. The zone for the Blackwater Estuary SPA/Ramsar extends to 22km from the European site boundary (see Map 5) and this clips the Uttlesford District Boundary. None of the other estuary-specific zones extend as far as Uttlesford and as such The Blackwater Estuary SPA/Ramsar is the only relevant site that needs to be considered.

The Blackwater Estuary

- 4.12 The Blackwater Estuary (Mid Essex Coast Phase 4) SPA is classified for:
- Dark-bellied brent goose (non-breeding);
 - Common pochard (breeding);
 - Hen harrier (non-breeding);
 - Ringed plover (breeding);
 - Grey Plover (non-breeding);
 - Dunlin (non-breeding);
 - Black-tailed godwit (non-breeding);
 - Little tern (breeding);
 - Waterbird assemblage (non-breeding).
- 4.13 The Blackwater Estuary Ramsar (Mid Essex Coast Phase 4) is listed for some of the same bird species (Dark-bellied Brent Goose, Grey Plover, Dunlin and Black-tailed Godwit and the wintering waterbird assemblage)

4.14 The supplementary conservation advice for the SPA¹⁹ sets a range of targets relating to disturbance from human activity. For example, for the non-breeding waterbird assemblage there is a target to “restrict the frequency, duration and / or intensity of disturbance affecting roosting, foraging, feeding, moulting and/or loafing birds so that they are not significantly disturbed.” The target is set to reduce (rather than restrict) for some species such as breeding Ringed Plover and Little Tern, reflecting the particular pressures these species are under (e.g. Liley et al., 2021). Clearly increased recreation use has the potential to undermine the conservation objectives. The issues are strategic in that it is the in-combination effects of housing growth over a wide area that are relevant.

Impacts to SAC and non-avian Ramsar interest

4.15 The Essex Estuaries SAC qualifies for the following habitats:

- Estuaries;
- Mudflats and sandflats not covered by seawater at low tide;
- Salicornia and other annuals colonising mud and sand;
- Spartina swards (*Spartinion maritimae*).

4.16 The Blackwater Estuary Ramsar (Mid Essex Coast Phase 4) is listed for the following non-avian interest:

- Saltmarsh;
- Wetland invertebrate assemblage;
- Wetland plant assemblage.

4.17 The SAC and Ramsar interest therefore relates to habitats that are largely inaccessible and on-the whole difficult to access. The wetland plants and invertebrates are likewise associated with terrain that is unlikely to be the focus for recreation. There is no specific mention of trampling damage, damage from boat traffic or similar in the supplementary conservation advice²⁰ and as such the risks are low. The only potential pathways by which recreation could undermine the

¹⁹ See

[https://designatedsites.naturalengland.org.uk/Marine/SupAdvice.aspx?SiteCode=UK9009245&SiteName=blackwater&SiteNameDisplay=Blackwater+Estuary+\(Mid-Essex+Coast+Phase+4\)+SPA&countyCode=&responsiblePerson=&SeaArea=&IFCAAra=&NumMarineSeasonality=8](https://designatedsites.naturalengland.org.uk/Marine/SupAdvice.aspx?SiteCode=UK9009245&SiteName=blackwater&SiteNameDisplay=Blackwater+Estuary+(Mid-Essex+Coast+Phase+4)+SPA&countyCode=&responsiblePerson=&SeaArea=&IFCAAra=&NumMarineSeasonality=8)

²⁰ See

<https://designatedsites.naturalengland.org.uk/Marine/SupAdvice.aspx?SiteCode=UK0013690&SiteName=essex&SiteNameDisplay=Essex+Estuaries+SAC&countyCode=&responsiblePerson=&SeaArea=&IFCAAra=&NumMarineSeasonality=>

conservation objectives would relate to the spread of invasive species (for which the supplementary advice sets a restore target) and/or trampling damage to saltmarshes. These pathways are not relevant given their nature (only a very small proportion of recreational users will directly access saltmarsh or spread non-native species), the distance from Uttlesford and the scale of growth that falls in the relevant visitor catchment.

Mitigation and policy wording

- 4.18 The RAMS is implemented through the Bird Aware Essex Coast project²¹. This has been established in-line with Bird Aware Solent, a sister project that is long-running and established. This has meant Bird Aware Essex has been able to build on the experience and expertise established on the Solent.
- 4.19 Only a small area of Uttlesford falls within the zone of influence (see Map 5) and there are no allocations within this zone. Core Policy 37 on the Natural Environment ensures compliance with the SPD. Contributions will be secured from development towards mitigation in accordance with the SPD, with the tariff will be applied to net additional dwellings, including Permitted Development as relevant. The zone is shown on the Policies Map and the supporting text highlights the zone of influence may change with time, potentially reflecting changing patterns of recreation use. This ensures there is flexibility if new evidence emerges.

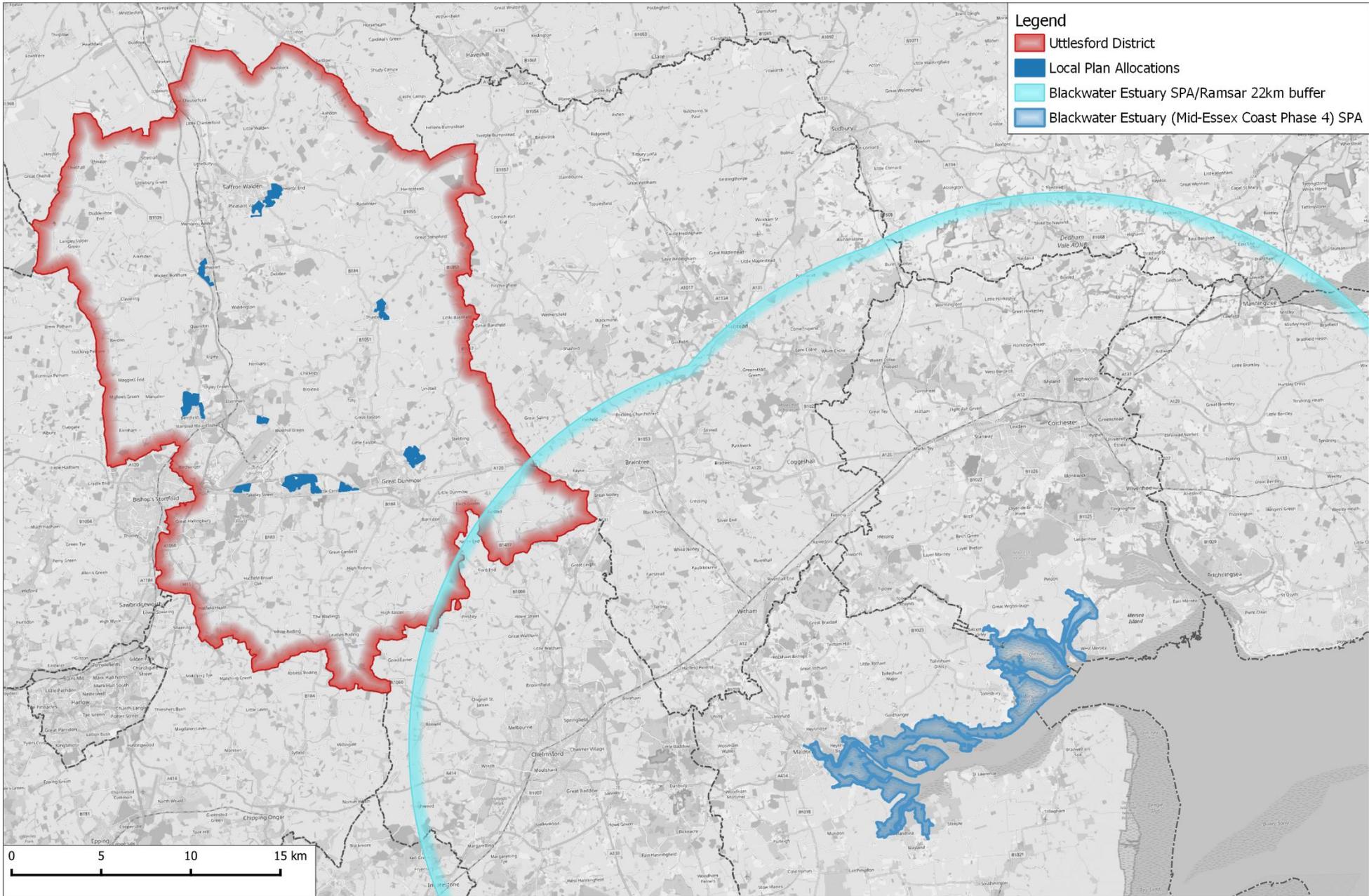
Conclusions

- 4.20 A strategic mitigation approach is now established to address impacts from bird disturbance; the approach is adopted as an SPD and contributions secured through policy. As such, it is possible at this iteration of the HRA to identify that necessary measures are in place to be able to rule out adverse effects on integrity from recreation for Blackwater Estuary (Mid Essex Coast Phase 4) SPA and the bird interest of the Blackwater Estuary (Mid Essex Coast Phase 4) Ramsar, alone or in-combination. Risks to the Essex Estuaries SAC and non-avian features of the Ramsar can be ruled out given the distances involved, the scale of growth proposed in the respective visitor catchment and the respective vulnerability of the interest. This conclusion would not change as a result of any in-combination assessment and as such, adverse effects to the Essex Estuaries SAC and non-avian features of the Ramsar can be ruled out alone or in-combination. These findings should be checked with Natural England and reviewed at the Regulation 19 stage

²¹ <https://birdaware.org/essex/>

of the Plan to check that there is no further evidence, revision to the zone boundaries or changes in the distribution of housing growth that might change the outcome.

Map 5: Blackwater Estuary SPA/Ramsar and 22km zone



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5. Appropriate Assessment Topic: Water Quality

Relevant policies from LSE screening

5.1 Screening identified likely significant effects in relation to the disposal of wastewater and the Essex Estuaries SAC/Blackwater Estuary (Mid Essex Coast Phase 4) SPA/Ramsar for the following policies in-combination with other elements of plan and other plans/projects:

- Core Policy 2: Meeting Our Housing Needs;
- Core Policy 4: Meeting Business and Employment needs;
- Core Policy 6: North Uttlesford Area Strategy;
- Core Policy 10 South Uttlesford Area Strategy;
- Core Policy 16: Thaxted Area Strategy;
- Core Policy 19: Rural Area Housing Requirement Figures.

Impacts from wastewater

5.2 Wastewater or sewage can be very damaging to water bodies as it can contain large amounts of nutrients (such as phosphorus and nitrates), ammonia, bacteria, harmful chemicals and other damaging substances. Issues arise where sewage treatment technology to adequately reduce levels of phosphorus and harmful chemicals is not in place, where leakages occur from privately owned septic tanks and, in wet weather, storm overflows can discharge untreated sewage. Poorly installed domestic washing machines and even washing cars at home can, in places, also add to the pollution load. Outcomes can include increased turbidity, algal blooms, reduced dissolved oxygen and an overall increase in the nutrient status of receiving waterbodies. Simply, increases in housing increase pressure on the sewage network and the volume of wastewater.

5.3 The pollution of inland and coastal waters has received greater recognition in recent years and the significance of such potential impacts and the need to mitigate has been given emphasis by Natural England's demands that new development affecting vulnerable water bodies must achieve 'nutrient neutrality', ie avoid any net increase in nitrate and phosphate pollution. Whilst this relates primarily to the disposal of foul water, run-off from hard surfaces can also be a factor. This reflects contemporary case law (the Dutch case) which makes clear that where water quality targets of European sites are not being met, further inputs of pollutants should not be allowed.

- 5.4 For the avoidance of doubt, the Essex coast European sites are not currently subject to these measures, but a range of other statutory and policy drivers still apply.
- 5.5 The Anglian and Thames water companies both provide wastewater treatment for new development within Uttlesford which are typically delivered by ensuring there is adequate capacity or headroom within the wastewater treatment system.
- 5.6 Whilst it should be expected that all existing wastewater treatment works that lie within the catchment of the Essex coast European sites operate within their licensed conditions and that all have capacity to accommodate predicted levels of growth, this is not known to the Council for certain. On the other hand, licenses for all wastewater treatment works and any changes to these would have been subjected to project-level HRAs and would not be permitted to operate if adverse effects could not be ruled out.
- 5.7 Furthermore, both water companies have recently produced their first Drainage and Wastewater Management Plan (DWMP)²². DWMPs provide the basis for integrated long-term planning relating to drainage, flooding and protection of the environment. These will inform the approach to wastewater management over the next twenty-five years (2025-2050).
- 5.8 Given their particular knowledge of and responsibilities for the water environment, the water companies and the Environment Agency are the competent authorities best placed to assess the impact of the disposal and the subsequent management of foul water, not the Council. The DWMPs and their accompanying assessment can therefore be expected to play an important role in the shape, content and direction of the Local Plan.
- 5.9 The Thames Water DWMP was subject to HRA²³. That HRA took the approach of identifying likely significant effects where sewage treatment works were within 10km of a European site. Overall, the HRA concluded that it was unlikely that the DWMP would have an adverse effect on the integrity of the European sites either alone or in-combination with other plans and projects. Much of the development

²² For Thames Water see: <https://www.thameswater.co.uk/about-us/regulation/drainage-and-wastewater-management/our-dwmp>. For Anglian Water see: <https://www.anglianwater.co.uk/about-us/our-strategies-and-plans/drainage-wastewater-management-plan/>

²³ <https://www.thameswater.co.uk/media-library/home/about-us/regulation/drainage-and-wastewater/appendix-l-habitats-regulations-assessment.pdf>

within the Uttlesford Local Plan falls within the Thames Water area, including sites at Takeley and towards Bishops Stortford.

- 5.10 By contrast no HRA has been conducted for the Anglian Water DWMP. It is the Anglian Water part of the sewage network which relates to the Essex Coast and as such there is no formal HRA that Uttlesford District Council can rely on. Without this information or an updated water cycle study to reflect the growth proposed in the plan, it would be premature to speculate on whether adverse effects can or cannot be ruled out for the Essex Coast. The risk relates to a wide area (multiple local authorities) and the Council can look to the Environment Agency and Anglian Water company for reassurance that the necessary checks and capacity is in place. Prior to the next iteration of the Local Plan HRA (at Regulation 19) further checks will be necessary with Anglian Water and further evidence gathering will be required in order to clarify the relevant water treatment works for the growth proposed, the available headroom/capacity at those works and any risks to the Essex Coast sites.

6. Conclusions

- 6.1 This HRA report has been produced alongside the Draft (Regulation 18) version of the Uttlesford Local Plan. The HRA will be updated at each public consultation stage in the plan making process and will be finalised at adoption. As such the HRA is iterative and this report is produced at an early stage in the Plan.
- 6.2 We have screened this version of the Plan and identified Likely Significant Effects relating to the disposal of wastewater and for recreation. Risks were identified for both pathways in-combination for the Essex Estuaries SAC and the Blackwater Estuary (Mid Essex Coast Phase 4) SPA/Ramsar.
- 6.3 There is a strategic mitigation scheme established to address recreation impacts to birds on the Essex Coast. This is referred to in policy and mitigation requirements set out in detail within an adopted SPD. The evidence demonstrates that only a very small portion of Uttlesford District lies within the relevant zone of influence and none of the allocations within the Plan fall within the zone. Given the level and distribution of growth and the mitigation scheme in place, a conclusion of no adverse effects on integrity with respect to recreation impacts and the Essex Estuaries SAC and the Blackwater Estuary (Mid Essex Coast Phase 4) SPA/Ramsar can be reached at this stage in the plan making.
- 6.4 With respect to the disposal of wastewater, further checks are necessary on the capacity at the relevant sewage treatment works and the implications for the Essex Estuaries SAC and the Blackwater Estuary (Mid Essex Coast Phase 4) SPA/Ramsar. These checks are necessary to inform the next iteration of the HRA. Given that much of the growth proposed lies within the Thames Water area (and therefore will not relate to the Essex Coast) and the large distances from Uttlesford to the coast, the risks are relatively low.
- 6.5 These conclusions should be revisited as the Plan progresses and checked with Natural England. The conclusions may need to be updated and revised according to any new evidence, further information or advice from Natural England.

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<https://www.dtapublications.co.uk/handbook/>

Appendix 1: Appendix 1: European Site Conservation Objectives

As required by the Directives, 'Conservation Objectives' have been established by Natural England and these define the required ecologically robust state for each European site interest feature. All sites should be meeting their conservation objectives.

When being fully met, each site will be adequately contributing to the overall favourable conservation status of the species or habitat interest feature across its natural range. Where conservation objectives are not being met at a site level, and the interest feature is therefore not contributing to overall favourable conservation status of the species or habitat, plans should be in place for adequate restoration.

Natural England has embarked on a project to renew all European site Conservation Objectives, in order to ensure that they are up to date, comprehensive and easier for developers and consultants to use to inform project level Habitats Regulations Assessments in a consistent way. In 2012, Natural England issued a set of generic European site Conservation Objectives, which should be applied to each interest feature of each European site.

The generic Conservation Objectives for each European site include an overarching objective, followed by a list of attributes that are essential for the achievement of the overarching objective. Whilst the generic objectives are standardised, they are to be applied to each interest feature of each European site, and the application and achievement of those objectives will therefore be site specific and dependant on the nature and characteristics of the site. The more detailed site-specific information to underpin these generic objectives, provides much more site-specific information, and this detail plays a fundamental role in informing HRA, and importantly gives greater clarity to what might constitute an adverse effect on a site interest feature.

For SPAs the overarching objective is to:

'Avoid the deterioration of the habitats of qualifying features, and the significant disturbance of the qualifying features, ensuring the integrity of the site is maintained and the site makes a full contribution to achieving the aims of the Birds Directive.'

This is achieved by, subject to natural change, maintaining and 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 populations of the qualifying features.
- The distribution of the qualifying features within the site.

For SACs the overarching objective is to:

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving Favourable Conservation Status of its Qualifying Features, by maintaining or restoring:

- The extent and distribution of qualifying natural 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

Conservation objectives inform any HRA of a plan or project, by identifying what the interest features for the site should be achieving, and what impacts may be significant for the site in terms of undermining the site's ability to meet its conservation objectives.

Appendix 2: Conservation Interest of European Sites

Links in the table cross-reference to the Natural England website and the relevant page with the site’s conservation objectives. In the qualifying features column, for SPAs NB denotes non-breeding and B breeding features. For SACs, # denotes features for which the UK has a special responsibility. The descriptive text is adapted from Natural England’s site improvement plan (SIP) for the relevant site. Pressures and threats are also from the site improvement plan (with “P” and “T” used to define which are current pressures and which are threats. For Ramsar sites, the qualifying features are taken from the Natural England designated site view for the relevant site²⁴, and the link cross-references to the relevant page.

Site	Reason for designation (# denotes UK special responsibility)	Pressures and threats (from relevant SIP)	Site description (from relevant SIP)
Epping Forest SAC	H4010. Northern Atlantic wet heaths with <i>Erica tetralix</i> ; Wet heathland with cross-leaved heath H4030. European dry heaths H9120. Atlantic acidophilous beech forests with <i>Ilex</i> sometimes also <i>Taxus</i> in the shrublayer (<i>Quercion robori-petraeae</i> or <i>Ilici-Fagenion</i>); Beech forests on acid soils	Air pollution (P) Undergrazing (P) Public access/Disturbance (P) Changes in species distributions (T) Inappropriate water levels (T) Water pollution (T) Invasive species (T) Disease (T) Invasive species (P/T)	Epping Forest is a large ancient wood-pasture with habitats of high nature conservation value including ancient semi-natural woodland, old grassland plains, wet and dry heathland and scattered wetland. The semi-natural woodland is particularly extensive but the forest plains are also a major feature and contain a variety of unimproved acid grasslands.

²⁴ <https://designatedsites.naturalengland.org.uk/>

Site	Reason for designation (# denotes UK special responsibility)	Pressures and threats (from relevant SIP)	Site description (from relevant SIP)
Blackwater Estuary (Mid Essex Coast Phase 4) SPA	A046a <i>Branta bernicula</i> : Dark-bellied brent goose (non-breeding) A059 <i>Aythya ferina</i> ; Common pochard (breeding) A082 <i>Circus cyaneus</i> ; Hen harrier (non-breeding) A137 <i>Charadrius hiaticula</i> Ringed plover (breeding) A141 <i>Pluvialis squatarola</i> (grey plover) (non-breeding) A149 <i>Calidris alpina alpina</i> ; Dunlin (non-breeding) A156 <i>Limosa limosa islandica</i> ; Black-tailed godwit (non-breeding) A195 <i>Sterna albifrons</i> : Little tern (breeding) Waterbird assemblage	Coastal squeeze (P/T) Public access/Disturbance (P/T) Fisheries: Commercial marine and estuarine (P/T) Planning permission: general(P) Changes in species distributions (T) Invasive species (P/T) Fisheries; Recreational marine and estuarine (P) Invasive species (P) Air pollution: risk of atmospheric nitrogen deposition (P)	<p>The Essex Estuaries SIP covers the Essex Estuaries SAC and five mid-Essex coast SPAs (Blackwater Estuary, Colne Estuary, Crouch and Roach Estuaries, Dengie and Foulness).</p> <p>The area is a typical, undeveloped, coastal plain estuarine system with associated open coast mudflats and sandbanks. Sub-tidal areas have a rich invertebrate fauna and there are extensive intertidal mudflats and sandflats.</p> <p>Four different saltmarsh features of European importance are represented as well as large areas of grazing marsh. The site is one of the most important areas for overwintering waterbirds in the UK and is of international importance for several breeding bird species.</p>
Blackwater Estuary (Mid Essex Coast Phase 4) Ramsar	Black-tailed godwit, <i>Limosa limosa</i> - Wintering Dark-bellied brent goose, <i>Branta bernicla</i> - Wintering Dunlin, <i>Calidris alpina</i> - Wintering Grey plover, <i>Pluvialis squatarola</i> - Wintering Saltmarsh Waterbird assemblage - Wintering Wetland invertebrate assemblage Wetland plant assemblage	See above.	See above.

Site	Reason for designation (# denotes UK special responsibility)	Pressures and threats (from relevant SIP)	Site description (from relevant SIP)
Essex Estuaries SAC	H1130. Estuaries H1140. Mudflats and sandflats not covered by seawater at low tide H1310. Salicornia and other annuals colonising mud and sand H1320. Spartina swards (<i>Spartinion maritimae</i>)	See above.	See above.
Devil's Dyke SAC	H6210 Semi-natural dry grasslands and scrubland facies: on calcareous substrates (Festuco-Brometalia)	Inappropriate scrub control (P/T) Air pollution (T)	Devil's Dyke holds one of the best and most extensive areas of species-rich chalk grassland in Cambridgeshire. The grassland is of a type characteristic to chalklands of south, central and eastern England and represents a habitat type now very restricted in distribution and extent throughout its British range. The Dyke is an ancient linear earthwork comprising a deep ditch and high bank, originally colonised by plants from adjacent calcareous grassland. For this reason the Dyke is important as one of the few remaining areas still supporting these relict chalkland vegetation communities, once traditionally maintained by sheep grazing
Eversden & Wimpole Woods SAC	S1308 Barbastelle bat, <i>Barbastella barbastellus</i>	Feature location/extent/condition unknown (P/T) Offsite habitat availability/management (P/T) Forestry and woodland management (T)	Eversden Wood is an ancient woodland of ash-maple type which is now very localised in extent, both locally and in lowland England as a whole. The site. It is one of the largest remaining areas of such woods on the chalky boulder clay in Cambridge and contains a rich assemblage of woodland plants including some uncommon species.

Site	Reason for designation (# denotes UK special responsibility)	Pressures and threats (from relevant SIP)	Site description (from relevant SIP)
		Air pollution (P)	The site holds colonies of Barbastelle bat, the sole European designated feature of the site. The bats are associated with the trees in Wimpole woods, these trees are used as a summer maternity roost where female bats gather to give birth to their young. The bats also use the site as a foraging area. Some of the woodland is also used as a flight path when bats forage outside the site.
Lee Valley SPA	A021(NB) <i>Botaurus stellaris</i> : Great bittern A051(NB) <i>Anas strepera</i> : Gadwall A056(NB) <i>Anas clypeata</i> : Northern shoveler	Water pollution (T) Hydrological changes (T) Public access/disturbance (T) Inappropriate scrub control (T) Fisheries: fish stocking (T) Invasive species (T) Inappropriate cutting/mowing (T) Air pollution (T)	The Lee Valley SPA comprises a series of embanked water supply reservoirs, sewage treatment lagoons and former gravel pits that display a range of man-made and semi-natural wetland and valley bottom habitats. The site is important for overwintering bittern as well as an internationally important population of two duck species.
Lee Valley Ramsar	Gadwall, <i>Anas strepera</i> – Wintering Shoveler, <i>Anas clypeata</i> – Wintering Water boatman, <i>Micronecta minutissima</i> Whorled water-milfoil, <i>Myriophyllum verticillatum</i>	See above	See above.
Wormley-Hoddesdonpark Woods SAC	H9160. Sub-Atlantic and medio-European oak or oak—hornbeam forest of the <i>Carpinion betuli</i> , Oak-hornbeam forests	Disease (T) Invasive species (T) Air pollution: impact of atmospheric nitrogen deposition (T) Deer (T) Vehicles (illicit) (P)	Wormley-Hoddesdonpark Woods is one of two outstanding examples in England of a type of oak-hornbeam forest mainly found in central Europe. Sessile and pedunculate oaks are key components of the canopy. Hornbeam is mixed with oaks and other trees in areas of high forest and is also

Site	Reason for designation (# denotes UK special responsibility)	Pressures and threats (from relevant SIP)	Site description (from relevant SIP)
		Forestry and woodland management (T) Public access/Disturbance (T)	present as almost pure stands of stored coppice, some of which are being brought back into a coppice cycle. Over 95% of the site is ancient woodland. It includes areas of wood-pasture and many veteran pollards and coppice stools. Distinctive features of the ground flora include stands of great wood-rush and an unusual moss community more typical of continental Europe.

Appendix 3: Allocations

Summary of distances (km) from each strategic allocation to the closest point of each European site, within a 20km radius of the Uttlesford district boundary.

Allocation Name	Site Ref	No. dwellings	Distance (km) from allocation					
			Devil's Dyke SAC	Epping Forest SAC	Essex Estuaries SAC / SPA / Ramsar	Eversden & Wimpole Woods SAC	Wormley - Hoddesdon park Woods SAC	Lee Valley SPA / Ramsar
North Uttlesford								
Great Chesterford – Land between Walden Road and Newmarket Road	002	0	20.76	42.64	50.00	17.76	37.47	32.84
Newport – North of Wicken Road/West of School Lane	008	74	28.97	33.83	42.77	24.51	30.06	25.31
Newport – Land at Pond Cross Farm Frambury lane	009	338	29.33	33.61	42.73	24.79	29.86	24.88
Saffron Walden – Land south of Radwinter Road (East of Griffin Place)	003	230	23.87	38.57	42.35	24.66	35.55	31.63
Saffron Walden – Land east of Shire Hill Farm and south of Radwinter Road	001	460	24.12	37.96	42.55	24.99	34.76	29.84
Saffron Walden – Land to the south of Debden Road	037	135	24.69	37.75	42.14	25.05	34.68	29.77
Saffron Walden – Land north east of Thaxted Road	008	20	25.0	37.8	42.6	24.8	34.5	29.6
Saffron Walden - ??	006	435						
South Uttlesford								
Great Dunmow – Land off The Broadway	009	1,100	37.4	28.6	27.0	40.1	31.0	27.1
Stansted Mountfitchet – Land west of Cambridge Road and north of Walpole Meadows	015	250	36.5	25.7	38.8	30.0	23.4	18.8
Stansted Mountfitchet – Land east of High Lane	013/023	140	36.6	25.4	38.0	30.7	23.1	18.5
Takeley – Warrish Hall Farm	007	902	39.5	23.5	31.9	36.9	24.4	20.5
Takeley – Land at Parkers Farm	016	243	39.8	24.3	31.3	37.7	25.4	21.3
Takeley - ??	003	491						

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Allocation Name	Site Ref	No. dwellings	Distance (km) from allocation					
			Devil's Dyke SAC	Epping Forest SAC	Essex Estuaries SAC / SPA / Ramsar	Eversden & Wimpole Woods SAC	Wormley - Hoddesdon park Woods SAC	Lee Valley SPA / Ramsar
Thaxted and Rural Uttlesford								
Thaxted – Land at Barnards Fields	002/003	150	30.0	34.7	33.6	33.8	34.5	30.7
Thaxted – Land to the east of Guelph's Lane	015, 017, 018 & 020	339	30.2	34.6	33.8	33.6	34.3	30.5