

Habitat Regulations Assessment

**Doncaster Council Core Strategy 2011 -2026
Submission Version (July 2011)**



Thorne Moors 2009

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Executive Summary

This report forms part of the Habitat Regulations Assessment for the Council's Core Strategy. The potential impact on European Sites, of the amount, type and broad location of development that is proposed for Doncaster between 2011 and 2026, is assessed. The report draws upon the findings of Habitat Regulations Assessment work carried out on earlier drafts of the Core Strategy and input received through consultation. The European sites considered are Thorne Moors, Hatfield Moors, Lower Derwent Valley and Humber Estuary. None of the policies were identified as having a negative impact on any European Site. No further work is therefore recommended with respect to the Core Strategy Habitat Regulations Assessment. The Core Strategy is a strategic high level document however it is important that subsequent lower tier plans and projects such as the Allocations Development Plan Document, Green Belt review and individual planning applications also comply with the Habitat Regulations.

1. Introduction

1.1 Habitat Regulations Assessment of Development Plans

1.1.1 Under the provisions of the Habitats Directive, and translated into UK law by the Habitats Regulations¹, a competent authority must carry out an assessment of whether a plan or project will significantly affect the integrity of any European Site, in terms of impacting the site's conservation objectives.

1.1.2 This report forms part of the Habitat Regulations Assessment for the Council's Core Strategy.

1.2 Historical Context

1.2.1 In 2005 the Council consulted on their Core Strategy Preferred Options. An assessment under the habitat regulations was undertaken that examined the potential impact of the preferred options on Thorne and Hatfield Moors Special Protection Area /Special Area Consultation, Lower Derwent Valley Special Protection Area /Special Area Conservation /Ramsar and Humber Flats Special Protection Area /candidate Special Area Conservation /Ramsar (See Appendix 1 for a map showing the locations of the sites). A number of policies were identified that may adversely impact on these European sites. The assessment made ten recommendations for how the document could be changed to alleviate the negative impact of these policies. These are discussed further in section 1.3.1.

1.2.2 Since 2005, the Core Strategy has been revised in light of changes in national policy, regional policy and political direction. In 2010 the Council consulted on its Revised Preferred Options for the Core Strategy. Since then consultation comments have been taken on board and some changes made

¹ The Conservation (Natural Habitats, &c.) Regulations 1994

to the document. Throughout this period a continual habitat regulations assessment process, based on the initial and subsequent recommendations, and working closely with Natural England, has helped to shape the policies in the current Core Strategy. During this time some Habitat Regulations Assessment work on interim drafts of the Core Strategy has been prepared for the Council by Land Use Consultants. This report will draw upon the findings from all these previous reports.

1.3 Previous Recommendations

1.3.1 Table 1 below lists the 10 recommendations that were made in the 2005 habitat regulations assessment and describes how these points have been incorporated into the revised document.

Table 1: Recommendations from 2005 Core Strategy Habitat Regulations Assessment.

Recommendation	How this has been incorporated
1. The nature conservation policy should be split into separate policies or elements reflecting different levels of protection afforded to local national and internationally designated sites.	Policy 16 on the natural environment has been split into four different elements. The first of these considers ecological networks. The second addresses protection related to local sites and non designated sites. The third seeks to protect nightjar foraging habitat in relation to Thorne and Hatfield Moors SPA. The last section addresses issues relating to landscape, trees and hedgerows. General protection of nationally and internationally recognised sites is mentioned in the supporting text rather than in the policy itself. This approach is in line with current national planning guidance.
2. An explanation of the issues and requirements relating to groundwater abstraction be added to the supporting text in either the Sustainable settlements or Natural Environment theme.	Policy 18 includes reference to protecting and enhancing water resources by minimizing abstraction requirements.
3. The flooding policy should be strengthened to ensure that where flooding mitigation measures are proposed their wider impact is assessed making specific reference to European Sites.	While flood events do affect water levels, Thorne Moor is underlain with alluvial clay making it less vulnerable to ground water fluctuations. Both sites could flood however if the pumping systems on surrounding land were stopped. The Environment Agency has however confirmed that they will not stop the pumping. Flooding is therefore not

	considered a likely impact on either site.
4. The core strategy should provide support and weight to the emerging Thorne and Hatfield Moors Access Strategy by including a new policy in either the Environment or Transport themes.	Policy 17 on Green Infrastructure acts to support the Thorne and Hatfield Moors Access Strategy by seeking to provide sufficient quality open space both within new and existing developments. As discussed in the supporting text this should help to prevent increased recreational pressure on Thorne and Hatfield Moors.
5. A policy requiring suitable mitigation banking is included in the Natural Environment theme to ensure that new developments and allocations do not reduce the net amount of feeding habitat.	Policy 16 requires new developments within 3km of Thorne and Hatfield Moors to provide a net gain in nightjar foraging habitat. This will act to prevent development impacting upon the nightjar population on Thorne and Hatfield Moors.
6. The links between the Transport and the Economy themes are made more explicit to demonstrate how the development of new employment sites will be supported by the development of more sustainable forms of travel.	Policy 2 sets out the growth and regeneration strategy for the borough. For each area the types of employment to be promoted are discussed alongside how public transport will be improved in parallel with delivering these employment options.
7. The requirement for any increase in passenger numbers or flights from Robin Hood Airport to have explicit planning permission should be made explicit in the Core Strategies' supporting text, as well as the implication that there will be a finite amount of expansion which will be able to be accommodated within environmental limits.	Policy 6 requires that proposals relating to growth of the airport demonstrate that there will be no detrimental impacts on the integrity of Thorne and Hatfield Moors.
8. It is recommended that the protection of European sites be made more explicit in the stand alone renewable energy policy together with a reference to the potential need for an appropriate assessment within the supporting text.	Policy 19 on Renewable energy explicitly makes reference to proposals needing to demonstrate that they have no significant impact on Thorne and Hatfield Moors. The supporting text goes on to discuss how different types of renewable energy proposals can potentially have different impacts on European sites and will need to consider the need for a Habitat Regulations Assessment.
9. The policy relating to trees should be divided into separate policies or elements. Individual trees and protecting them from development, supporting appropriate woodland planting and supporting appropriate biomass planting and highlighting the potential impact of new woodland on European Sites.	Policy 16 seeks to retain and protect appropriate trees within developments as well as incorporating new tree, woodland and hedgerow planting. Policy 19 deals separately with issues relating to biomass planting and how this may impact on European Sites.
10. The policies relating to Gypsy and Traveller Sites should include appropriate criteria steering Gypsy and Traveller Sites away from Natura 2000 sites.	Policy 13 explicitly states that proposals for Gypsy and Traveller sites will only be supported where they demonstrate that there will be no harm to biodiversity. In combination with Policy 16 on the Natural Environment it is considered this will be sufficient to prevent this type of development affecting European Sites.

1.4 Natura 2000 Sites

1.4.1 Natura 2000 sites are a network of sites spanning Europe that are considered to represent natural habitats of the highest value for nature conservation. The sites can be important for plants and animals that are rare or considered threatened in a European context. The network of sites were established under the 1992 Habitats Directive² and 1979 Birds Directive³ and consist of Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). These sites are often simply referred to as 'European Sites'. SACs are designated for their importance for habitats while SPAs are designated for their importance for birds. In addition to SPA and SAC sites, Ramsar⁴ sites are designated areas important for their wetland habitats. Planning Policy Statement 9 states that Ramsar sites should receive the same level of protection as SPA and SAC sites. This means that any Ramsar sites should be taken into account in the HRA process.

1.5 Report Aims

1.5.1 This report aims to:

- Identify the sites within the 15km of the Doncaster Metropolitan Borough Boundary.
- Summarise the reasons for designation of each of these the sites.
- Screen each of the policies within the current draft Core Strategy for their potential to impact upon a European site.
- Identify if there are any outstanding issues that need further investigation.

² Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora.

³ Council Directive 79/409/ECC on the conservation of wild birds (as amended and subsequently codified in Directive 2009/147/EC).

⁴ Convention on Wetlands of International Importance especially as Waterfowl Habitat. Ramsar (Iran), 2nd February 1971.

2. Sites Information

2.1 European Sites to be Considered

2.1.1 Two European Sites lie within the Doncaster Metropolitan Borough boundary. In addition two sites have been identified that lie within 15km⁵ of the boundary:

- Thorne Moors SAC and SPA
- Hatfield Moors SAC and SPA
- Lower Derwent Valley SAC, SPA and Ramsar
- Humber Estuary SAC, SPA and Ramsar

Appendix 1 contains a map showing the location of the above sites in relation to the Doncaster Metropolitan Borough boundary.

2.1.2 Previous habitat regulations assessment work has considered whether any European sites outside the 15km radius have the potential to be impacted by the development plan. Consultation with Natural England and the Environment Agency concluded that an adverse impact on any European sites outside this boundary was unlikely.

2.2 Conservation Objectives

2.2.1 Information on each of the above sites was collected to help inform the Habitat Regulations Assessment process. This included Standard Data forms for SAC's and SPA's and Information sheets for Ramsar sites. Details of the conservation objectives of each of the sites were also obtained from Natural England. Together this information was used to identify which aspects of the draft plan have the potential to affect site integrity.

⁵ No set distance is prescribed in the HRA process, however 15km is considered reasonable in this instance.

2.2.2 The reasons for site designation for each site are detailed below in Table 2.

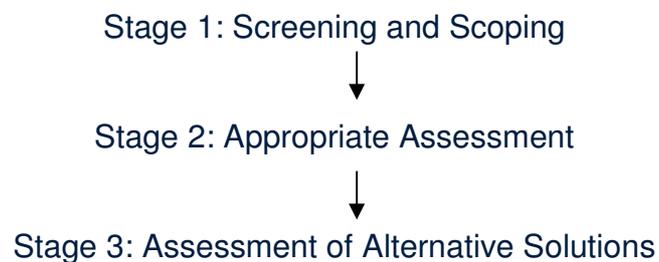
Table 2: Reasons for site designation

Site	Designated Feature		
	SAC	SPA	Ramsar
Thorne Moors	The presence of degraded raised bog habitat capable of regeneration. It is the largest area of this habitat type in the country.	The area regularly supports a population of nightjar during the breeding season.	n/a
Hatfield Moors	The presence of degraded raised bog habitat capable of regeneration. It is the second largest area of this habitat type in the country.	The area regularly supports a population of nightjar during the breeding season.	n/a
Lower Derwent Valley	The presence of lowland hay meadow, alluvial forests with alder and beech and otter.	Populations of European importance for: Bewick's swan, ruff, golden plover, shoveler and teal.	A traditionally managed species rich alluvial flood meadow. A rich assemblage of wetland invertebrates. The site is a staging post for bird migration. The site supports and internationally important assemblage of waterfowl.
Humber Estuary	The presence of estuary habitat, mudflats and sandbanks. Sandbanks covered by seawater. Coastal lagoons, Salicornia colonizing mud and sand. Atlantic salt meadows. Dunes (shifting and fixed). Lamprey (sea and river). Grey Seal.	Populations of European importance for: little tern, hen harrier, bar-tailed godwit, ruff, golden plover, pochard, teal, wigeon, mallard, turnstone, scaup, brent goose, sanderling, dunlin, knot, ringed plover, oystercatcher, curlew, grey plover, shelduck, redshank and lapwing.	The site contains near natural estuary habitat. Grey seal, Natterjack toad. Migration route for lamprey species. Internationally important populations of waterfowl and waders.

3. Methodology

3.1 Introduction

3.1.1 A detailed methodology for undertaking a Habitat Regulations Assessment in Doncaster was produced in 2007 by Land Use Consultants⁶. This report follows the principles set out in that document. To summarise briefly, an assessment under the Habitat Regulations can be split into three stages:



3.2 Stage 1: Screening and Scoping

3.2.1 The screening stage identifies if a policy or plan will have an impact on a European Site and therefore if an 'Appropriate Assessment' is needed. The first stage is to identify which policies or plans will have no effect on any European Site. Categories A-E listed in Table 3 identify common reasons why a policy or plan may not need an Appropriate Assessment. Categories F and G identify reasons why a plan or project might impact upon a European Site. In chapter 4 each policy is considered in turn and the results of the screening exercise recorded.

⁶ Doncaster Metropolitan Borough Council Local Development Framework Habitat Regulations Assessment Methodology. 2007 Land Use Consultants

Table 3: Screening Categorisation

Category	Purpose of Policy
A	The policy will not itself lead to development (e.g. it is a policy about design or other qualitative criteria for development).
B	The policy makes provision for a number or type of development, the location of which is to be considered in a lower tier plan.
C	The policy is intended to protect the natural environment including biodiversity.
D	The policy is intended to conserve or enhance the natural, built or historic environment, where enhancement will not have an effect on a European Site.
E	The policy helps steer development away from sensitive sites as it promotes development in other areas.
F	<p>The plan or policy is likely to have an impact on a European Site as it will lead to the following;</p> <ul style="list-style-type: none"> • The plan or policy chooses land or steers future built development in an area where a European site is located. • The plan or policy is a proposal for Major built Development (including quarrying, and wind farms) adjacent to or in an area that includes a European site. • An amount or type of development that regardless of where it is located could impact a European site.
G	The plan or policy when considered in combination with other plans or projects is likely to have a significant effect on a European site.

3.3 Stage 2: Appropriate Assessment

3.3.1 If stage 1 identifies the need for an Appropriate Assessment then more detailed work will need to be undertaken to establish exactly what the potential impacts of the plan are on European site integrity. An iterative process is then undertaken that aims to change the policy in a manner that removes any risk of a negative impact on a site.

3.3.2 In making the assessment of how site integrity is impacted by a project or plan then it is essential that the precautionary principle is adopted. The key premise of the precautionary principle is that in situations where an impact on site integrity cannot definitely be ruled out, then an adverse impact should be assumed.

3.4 Stage 3: Imperative Reasons of Overriding Public Interest

3.4.1 In the unlikely scenario that it is not possible to adapt a plan or policy sufficiently to avoid any adverse impact on a European site then it would be necessary to establish whether there are any imperative reasons of overriding public interest that mean the plan should progress. If it is considered that such reasons exist, which outweigh the damage that will be caused to the site, then the next stage is to notify the Government Office who will consider whether the plan or project should proceed.

4. Core Strategy Habitat Regulations Assessment

4.1 Screening and Scoping Results

4.1.1 Table 4 contains the full results of the screening and scoping exercise.

4.1.2 Following the screening exercise none of the policies were identified as having a negative impact on any European Site. Policy 2 - Growth and Regeneration Strategy, 3 – Countryside, 5 – Employment Strategy, 6 - Robin Hood Airport and Business Park, 10 - Housing Requirement Land Supply and Phasing, 19 – Renewable Energy and 20 – Minerals were initially identified as having the potential to impact on the integrity of Thorne and Hatfield Moors, Lower Derwent Valley or Humber Estuary. Following more detailed consideration of these policies it is considered that the impacts they may have should be considered in greater depth within lower tier plans or projects. These plans and projects include the allocations development plan document, the greenbelt review, the preferred areas of search for minerals and planning applications for certain types of proposals. It is important to note that while the above policies provide a broad framework for how development will be supported in Doncaster they do not provide overriding backing to plans or projects that are shown to have an adverse impact on European Sites. Any development found to have an adverse impact on the integrity of a European site, which cannot be mitigated, will not be in accordance with the Core Strategy. This is clearly stated in paragraph 8.4 of the implementation chapter of the Core Strategy, as all development will need to comply with the Habitat Regulations.

Table 4: Policy Screening Results

Section of document, policies or objectives being screened	Policy Reference / Section Reference	Categorisation in initial screening with explanation	Comments and recommendations where initial screening is Category F or G	Categorisation following detailed consideration of the issues and taking into account changes to plan or policy
Chapter 3 Policy 1 Quality of Life	Sections A to E	<p>A - Does not lead directly to development The policy sets out the approach to building a strong economy whilst improving quality of life. No aspect of this policy will lead directly to development.</p>	N/A	A - Does not lead directly to development
Chapter 3 Policy 2 Growth and Regeneration Strategy	Section A	<p>F - likely impact / G - in combination impact This policy seeks to deliver new homes in and around existing urban areas in line with a settlement hierarchy.</p>	<p>Increased housing growth across the borough has the potential to impact Thorne and Hatfield Moors, the lower Derwent Valley and the Humber Estuary.</p> <p>For further discussion of the issues arising from the proposed housing please see Policy 10 - Housing Requirement Land Supply and Phasing.</p>	<p>B – Lower Tier Plan The issues relating to air pollution and housing sites will be considered when the allocations development plan is produced.</p> <p>Issues relating to water abstraction, visitor pressure and loss of nightjar foraging habitat have been resolved.</p>
	Section B	<p>E - Steers development away from sites This policy seeks to</p>	N/A	E - Steers development away from sites

Section of document, policies or objectives being screened	Policy Reference / Section Reference	Categorisation in initial screening with explanation	Comments and recommendations where initial screening is Category F or G	Categorisation following detailed consideration of the issues and taking into account changes to plan or policy
		locate retail, leisure, cultural, entertainment office and leisure uses in existing urban areas away from sensitive sites.		
	Section C	F - likely impact / G - in combination impact This policy seeks to deliver employment sites in locations that support the settlement hierarchy.	The precise location of these sites will be determined in the allocations development plan document, however such development has the potential to impact on Thorne and Hatfield Moors, the Lower Derwent Valley and Humber Estuary. For further discussion of the issues arising from the delivering employment growth in Doncaster please see Policy 5 - Employment Strategy.	B – Lower Tier Plan and no impact.
	Sections E	F - likely impact / G - in combination impact This policy seeks to create the necessary transport schemes to support employment opportunities.	Increasing road, rail and air travel will potentially result in increased carbon dioxide and nitrous oxide levels. These pollutants have the potential to impact on Thorne and Hatfield Moors. For further discussion of the issues arising from the delivering transport schemes in Doncaster please see Policy 9 – Providing Travel Choice.	E - Steers development away from sites No new roads or rail links are proposed in close proximity to the moors. This will steer road related air pollution away from Thorne and Hatfield Moors.

Section of document, policies or objectives being screened	Policy Reference / Section Reference	Categorisation in initial screening with explanation	Comments and recommendations where initial screening is Category F or G	Categorisation following detailed consideration of the issues and taking into account changes to plan or policy
	Section D, F and G	<p>A - Does not lead directly to development and D – Intended to conserve environment</p> <p>The policy discusses delivery of job opportunities in locations where public transport links can be provided. It also addresses the timing of growth and regeneration with respect to green infrastructure and seeks to preserve and enhance the natural environment.</p>	N/A	<p>A - Does not lead directly to development and D – Intended to conserve environment</p>
Chapter 3 Policy 3 Countryside	Sections A	<p>E - Steers development away from sites</p> <p>This policy talks about retaining the existing extent of the green belt and countryside protection policy area.</p>	N/A	<p>E - Steers development away from sites</p>

Section of document, policies or objectives being screened	Policy Reference / Section Reference	Categorisation in initial screening with explanation	Comments and recommendations where initial screening is Category F or G	Categorisation following detailed consideration of the issues and taking into account changes to plan or policy
		It will help to steer development away from sensitive areas.		
	Section B	<p>F - likely impact / G - in combination impact</p> <p>The policy allows for the allocation of some housing sites in greenbelt and countryside protection policy area. Dependant on the location of these sites there could be impacts on Thorne and Hatfield Moors, the lower Derwent Valley and the Humber Estuary.</p>	<p>Increased housing growth has the potential to impact Thorne and Hatfield Moors, the lower Derwent Valley and the Humber Estuary.</p> <p>For further discussion of the issues arising from the proposed housing please see Policy 10 - Housing Requirement Land Supply and Phasing.</p>	<p>B – Lower Tier Plan</p> <p>The issues relating to air pollution and housing sites will be considered when the allocations development plan is produced.</p> <p>Issues relating to water abstraction, visitor pressure and loss of nightjar foraging habitat have been resolved.</p>
	Section C and E	<p>D – Intended to conserve environment</p> <p>These policies are designed to protect and enhance the countryside.</p>	N/A	D – Intended to conserve environment
	Section D	<p>B – Lower Tier Plan</p> <p>The policy supports</p>	N/A	B – Lower Tier Plan

Section of document, policies or objectives being screened	Policy Reference / Section Reference	Categorisation in initial screening with explanation	Comments and recommendations where initial screening is Category F or G	Categorisation following detailed consideration of the issues and taking into account changes to plan or policy
		some types of development that may impact on European sites such as wind farms and mineral extraction, however the precise location of these would be determined in a lower tier plan.		
	Section F	<p>B – Lower Tier Plan A Green Belt review has the potential to extend or reduce the existing extent of the protection to the countryside. The impact on European sites is therefore uncertain at this stage and it is considered more appropriate to assess the impact on European Sites of a Green Belt review as part of the review process.</p>	N/A	B – Lower Tier Plan

Section of document, policies or objectives being screened	Policy Reference / Section Reference	Categorisation in initial screening with explanation	Comments and recommendations where initial screening is Category F or G	Categorisation following detailed consideration of the issues and taking into account changes to plan or policy
Chapter 3 Policy 4 Flooding and Drainage	Sections A to D	<p>A - Does not lead directly to development and D – Intended to conserve environment This policy will not directly lead to development as it relates to preventing flooding. It also has the potential to conserve and enhance the natural environment by creating natural flood storage.</p>	N/A	<p>A - Does not lead directly to development and D – Intended to conserve environment</p>
Chapter 4 Policy 5 Employment Strategy	Sections A to C	<p>F - likely impact / G - in combination impact This policy outlines the number of jobs, types of sectors and broad locations of employment that will be delivered in Doncaster.</p>	Employment sites within 3km of Thorne and Hatfield Moors have the potential to result in a loss of nightjar foraging habitat. This loss of habitat will be mitigated by Policy 16 (Valuing Our Natural Environment) which requires that all developments within 3km of Thorne and Hatfield Moor must demonstrate that they will	<p>B – Lower Tier Plan and no impact.</p>

⁷ The ecological effects of diffuse air pollution from road transport. Report Number 580. English Nature.

Section of document, policies or objectives being screened	Policy Reference / Section Reference	Categorisation in initial screening with explanation	Comments and recommendations where initial screening is Category F or G	Categorisation following detailed consideration of the issues and taking into account changes to plan or policy
		<p>Land take associated with employment developments has the potential to result in a loss of foraging habitat for nightjar and birds from the Humber Estuary and Lower Derwent Valley.</p> <p>Some types of employment could result in a greater demand for water. This could impact all four European sites which are each vulnerable to changes in hydrology.</p> <p>Some types of employment may result in the production of carbon dioxide and nitrous oxides.</p> <p>The desire to local strategic warehousing along the M180 and</p>	<p>provide a net gain in nightjar foraging habitat.</p> <p>Policy 16 is also expected to contribute towards mitigating the impact of the loss of foraging habitat for birds from the Humber Estuary and Lower Derwent Valley. Policy 17 - Providing Green Infrastructure should also help to mitigate for any loss of habitat caused by development as it seeks to enhance the borough's green infrastructure network.</p> <p>A review of the Yorkshire Water Management Plan has suggested that no new water abstraction licenses will be given for the Doncaster Area. In addition a strategic Environmental Assessment of those granted to date has concluded that they will not adversely impact any European sites. Any new abstraction licenses that were requested would also be subject to an appropriate assessment. Finally with respect to previous drafts of the</p>	

Section of document, policies or objectives being screened	Policy Reference / Section Reference	Categorisation in initial screening with explanation	Comments and recommendations where initial screening is Category F or G	Categorisation following detailed consideration of the issues and taking into account changes to plan or policy
		<p>M18 may impact on Thorne and Hatfield Moors.</p>	<p>core strategy the Environment Agency have said that they expect Yorkshire Water to have sufficient capacity to meet the needs of new housing and domestic and smaller developments detailed within the core strategy. In light of this, and considering that the level of growth proposed in the new draft is the same as the previous one, it is considered that there will be no impact on a European site arising from changes in hydrology.</p> <p>There is a desire to locate strategic warehousing along the M18 and M180 and in addition to this certain types of development may lead to rises in air pollutants that could negatively impact Thorne and Hatfield Moors. Research by Natural England⁷ has shown that the dry deposition of pollutants, such as nitrous oxides, is estimated to take place up to 200m from a source such as a dual carriageway. The M18 is over 2km from Thorne and Hatfield Moors. The M180 is over 800m from</p>	

Section of document, policies or objectives being screened	Policy Reference / Section Reference	Categorisation in initial screening with explanation	Comments and recommendations where initial screening is Category F or G	Categorisation following detailed consideration of the issues and taking into account changes to plan or policy
			Hatfield Moors and 4km from Thorne Moors. It is therefore considered that dry deposition of pollutants will not be an issue. In addition the locations and exact nature of all these sites will be determined in the Allocations Development Plan Document and specific project details would be dealt with at the planning application stage.	
Chapter 4 Policy 6 Robin Hood Airport and Business Park	Section A to D	F - likely impact / G - in combination impact This policy sets out how growth and investment at the airport will be supported. This includes improving surface access to the airport. Increases in road and rail travel to and from the airport as well as expansion in the number of flights at the airport have the potential to increase nitrous oxide	Research by Natural England ⁸ has shown that the dry deposition of pollutants, such as nitrous oxides, is estimated to take place up to 200m from a source such as a dual carriageway. Thorne and Hatfield Moors are located 400m from the nearest major road, and over 4km from the airport. It is therefore considered that dry deposition will not be an issue with respect to improving surface access to the airport. A rise in the number of flights at the airport, to exceed that in the current planning permission, would require a	B – Lower Tier Plan and no impact.

⁸ The ecological effects of diffuse air pollution from road transport. Report Number 580. English Nature.

Section of document, policies or objectives being screened	Policy Reference / Section Reference	Categorisation in initial screening with explanation	Comments and recommendations where initial screening is Category F or G	Categorisation following detailed consideration of the issues and taking into account changes to plan or policy
		emissions.	new planning application. It is considered more appropriate that any application to expand the airport undertakes the relevant work to satisfy the habitat regulations with respect to air pollution issues. This is because the scale of the proposed expansion would be more accurately know at this point in time and hence the assessment would be more meaningful. In addition the policy clearly states that proposals would only be supported by the core strategy if it can be demonstrated that there is no detrimental impact on the conservation objectives at Thorne and Hatfield Moors.	
Chapter 4 Policy 7 Retail and Town Centres	Sections A and D	E - Steers development away from sites This policy will help to steer development away from sensitive sites by directing it towards urban centres.	N/A	E - Steers development away from sites
	Sections B, C and E	A - Does not lead directly to development	N/A	A - Does not lead directly to development

Section of document, policies or objectives being screened	Policy Reference / Section Reference	Categorisation in initial screening with explanation	Comments and recommendations where initial screening is Category F or G	Categorisation following detailed consideration of the issues and taking into account changes to plan or policy
		The policy discusses design issues relating to retail provision.		
Chapter 4 Policy 8 Doncaster Town Centre	Sections A to C	E - Steers development away from sites This policy relates to development in the town centre and will steer pressure away from sensitive areas.	N/A	E - Steers development away from sites
Chapter 4 Policy 9 Providing Travel Choice	Section A, B and D	F - likely impact / G - in combination impact The policy addresses improvements to the road and rail network, as well as improved air, rail and road freight facilities. These works have the potential to lead to increases in these types of traffic across the borough.	Research by Natural England ⁹ has shown that the dry deposition of pollutants, such as nitrous oxides, is estimated to take place up to 200m from a source such as a dual carriageway. The proposed road improvements and improved freight facilities may increase traffic on the M18 and M180. The M18 is over 2km from Thorne and Hatfield Moors. The M180 is over 800m from Hatfield Moors and 4km from Thorne Moors. It is therefore considered that dry deposition of pollutants will not be an issue.	E - Steers development away from sites

⁹ The ecological effects of diffuse air pollution from road transport. Report Number 580. English Nature.

Section of document, policies or objectives being screened	Policy Reference / Section Reference	Categorisation in initial screening with explanation	Comments and recommendations where initial screening is Category F or G	Categorisation following detailed consideration of the issues and taking into account changes to plan or policy
	Sections C, E, F and G	<p>A - Does not lead directly to development The policy concerns providing appropriate levels of city centre parking while promoting buses, walking and cycling within communities. More sustainable modes of transport should help to reduce air pollution.</p>	N/A	A - Does not lead directly to development
Chapter 5 Policy 10 Housing Requirement Land Supply and Phasing	Sections A and B	<p>F - likely impact / G - in combination impact The policy makes provision for supplying sufficient land to meet Doncaster's housing requirement. While the precise locations of housing will not be determined until the allocations development plan document the amount of housing proposed does have the potential</p>	A review of the Yorkshire Water Management Plan has suggested that no new water abstraction licenses will be given for the Doncaster Area. In addition a strategic Environmental Assessment of those granted to date has concluded that they will not adversely impact any European sites. Any new abstraction licenses that were requested would also be subject to an appropriate assessment. Finally with respect to previous drafts of the core strategy the Environment Agency have said that they expect	<p>B – Lower Tier Plan The issues relating to air pollution and housing sites will be considered when the allocations development plan is produced.</p> <p>The issues relating to water abstraction, visitor pressure and loss of nightjar foraging habitat have been resolved.</p>

Section of document, policies or objectives being screened	Policy Reference / Section Reference	Categorisation in initial screening with explanation	Comments and recommendations where initial screening is Category F or G	Categorisation following detailed consideration of the issues and taking into account changes to plan or policy
		<p>to impact on Thorne and Hatfield Moors, the Lower Derwent Valley and the Humber Estuary.</p> <p>Increased housing will result in a greater demand for water. This could impact All four European sites which are vulnerable to changes in hydrology.</p> <p>Increased housing levels could increase visitor pressure on Thorne and Hatfield Moors.</p> <p>More houses are likely to lead to more car owners living in the Doncaster area hence cause increases in air pollution. This could detrimentally impact Thorne and Hatfield</p>	<p>Yorkshire Water to have sufficient capacity to meet the needs of new housing and domestic and smaller developments detailed within the core strategy. In light of this, and considering that the level of growth proposed in the new draft is the same as the previous one, it is considered that there will be no impact on a European site arising from changes in hydrology.</p> <p>Doncaster Metropolitan Borough Council has produced an Open Access Management Plan for Thorne and Hatfield Moors. This includes measures that will help to alleviate the pressure of increased numbers of visitors on Thorne and Hatfield Moors. Specifically the plan includes measures such as employing wardens, using interpretive signs and managing the habitats on site. In addition, policy 17 (Providing Green Infrastructure) requires new housing developments to provide sufficient open space to meet the needs of both new and existing communities.</p>	

Section of document, policies or objectives being screened	Policy Reference / Section Reference	Categorisation in initial screening with explanation	Comments and recommendations where initial screening is Category F or G	Categorisation following detailed consideration of the issues and taking into account changes to plan or policy
		<p>Moors.</p> <p>Land take associated with housing developments has the potential to result in a loss of foraging habitat for nightjar and birds from the Humber Estuary and Lower Derwent Valley.</p>	<p>This will help to reduce the number of visitors to the moors by providing good alternative provision for open space.</p> <p>More housing is likely to result in a rise in the population, an increase in the number of car owners and therefore a rise in air pollution from nitrous oxides and carbon dioxide. Provided no new roads are built within 200m of the Moors then there should be no impact from dry deposition of pollutants. It is therefore considered that the impact of air pollution from new housing sites should be considered in the Habitat Regulations assessment of the Allocations Development Plan Document.</p> <p>Housing sites within 3km of Thorne and Hatfield Moors have the potential to result in a loss of nightjar foraging habitat. This loss of habitat will be mitigated by Policy 16 (Valuing Our Natural Environment) which requires that all developments within 3km of</p>	

Section of document, policies or objectives being screened	Policy Reference / Section Reference	Categorisation in initial screening with explanation	Comments and recommendations where initial screening is Category F or G	Categorisation following detailed consideration of the issues and taking into account changes to plan or policy
			<p>Thorne and Hatfield Moor must demonstrate that they will provide a net gain in nightjar foraging habitat.</p> <p>Policy 16 is also expected to contribute towards mitigating the impact of the loss of foraging habitat for birds from the Humber Estuary and Lower Derwent Valley. Policy 17 regarding green infrastructure should also help to mitigate for any loss of habitat caused by development as it seeks to enhance the borough's green infrastructure network.</p>	
Chapter 5 Policy 11 Housing Renewal and Regeneration	Section A to D	<p>E - Steers development away from sites The policy seeks to support housing renewal schemes. This will involve developing brownfield sites before releasing greenfield sites. This will help steer development away from ecologically sensitive areas.</p>	N/A	E - Steers development away from sites

Section of document, policies or objectives being screened	Policy Reference / Section Reference	Categorisation in initial screening with explanation	Comments and recommendations where initial screening is Category F or G	Categorisation following detailed consideration of the issues and taking into account changes to plan or policy
Chapter 5 Policy 12 Housing Mix and Affordable Housing	Sections A to D	A - Does not lead directly to development This policy deals with issues relating to delivering a mix of housing sizes, types, prices and tenures. It will not itself lead to development.	N/A	A - Does not lead directly to development
Chapter 5 Policy 13 Gypsies and Travellers	Sections A to D	D - Intended to conserve environment / E - Steers development away from sites This policy outlines when gypsy and traveler sites will be supported. The policy includes measures that will act to ensure the natural environment is protected by steering development away from important sites.	N/A	D - Intended to conserve environment / E - Steers development away from sites
Chapter 6 Policy 14 Design and Sustainable	Section A	A - Does not lead directly to development	N/A	A - Does not lead directly to development

Section of document, policies or objectives being screened	Policy Reference / Section Reference	Categorisation in initial screening with explanation	Comments and recommendations where initial screening is Category F or G	Categorisation following detailed consideration of the issues and taking into account changes to plan or policy
Construction		This policy relates to the quality of designs. It will not lead directly to development.		
	Sections B and C	C - Policy protects environment This policy is designed to protect the natural environment by reducing the effects of climate change and making developments more sustainable.	N/A	C - Policy protects environment
Chapter 6 Policy 15 Valuing our Historic Environment	Sections A to C	D - Intended to conserve environment This policy is concerned with protecting the historic environment.	N/A	D - Intended to conserve environment
Chapter 6 Policy 16 Valuing Our Natural Environment	Sections A to D	C - Policy protects environment/ D - Intended to conserve environment This policy is designed to protect and enhance the natural environment including ecological	N/A	C - Policy protects environment / D - Intended to conserve environment

Section of document, policies or objectives being screened	Policy Reference / Section Reference	Categorisation in initial screening with explanation	Comments and recommendations where initial screening is Category F or G	Categorisation following detailed consideration of the issues and taking into account changes to plan or policy
		networks, biodiversity features and landscape and trees. It will also ensure that developments within 3km of Thorne and Hatfield Moors will deliver a net gain in nightjar foraging habitat.		
Chapter 6 Policy 17 Providing Green Infrastructure	Sections A to D	C - Policy protects environment/ D - Intended to conserve environment This policy is designed to protect, maintain, enhance and extend the green infrastructure network in Doncaster. It also addresses the need for public open space provision in new developments which will help to reduce visitor pressure on Thorne and Hatfield Moors.	N/A	C - Policy protects environment/ D - Intended to conserve environment

Section of document, policies or objectives being screened	Policy Reference / Section Reference	Categorisation in initial screening with explanation	Comments and recommendations where initial screening is Category F or G	Categorisation following detailed consideration of the issues and taking into account changes to plan or policy
Chapter 7 Policy 18 Air, Water and Agricultural Land	Section A	C - Policy protects environment/ D - Intended to conserve environment This policy looks at improving air quality. This will have a positive impact on Thorne and Hatfield Moors.	N/A	C - Policy protects environment/ D - Intended to conserve environment
	Sections B and C	C - Policy protects environment This policy seeks to protect the environment in relation to air and water quality. It also seeks to efficiently use the borough's agricultural land resource.	N/A	C - Policy protects environment
	Section D	C - Policy protects environment This policy seeks to protect Doncaster's water resources. This will help to ensure the integrity of Thorne and Hatfield Moors.	N/A	C - Policy protects environment

Section of document, policies or objectives being screened	Policy Reference / Section Reference	Categorisation in initial screening with explanation	Comments and recommendations where initial screening is Category F or G	Categorisation following detailed consideration of the issues and taking into account changes to plan or policy
Chapter 7 Policy 19 Renewable Energy	Section A to C	<p>F - likely impact This policy is about generating renewable energy. It supports proposals for a range of renewable energy schemes including biomass and wind power.</p>	<p>The policy with respect to wind farms is to support small scale developments at locations away from Thorne and Hatfield Moors. This should reduce the possibility of an impact of this policy on nightjar populations.</p> <p>While the policy supports growing biomass crops, the technology used during processing will need to be assessed in application on a case by case basis.</p>	<p>E - Steers development away from sites With respect to wind farms the policy will help steer development away from European sites.</p> <p>B – Lower Tier Plan The precise details of a proposal for biomass would need to be considered in order to establish if there is any possible impact. It is therefore considered more appropriate to assess this at the planning application stage.</p>
Chapter 7 Policy 20 Minerals	Section A	<p>F - likely impact The policy says that preferred areas of search for sand and gravel extraction will be identified. These preferred areas will fall within the minerals safeguarding areas which are in close proximity to both</p>	<p>Policy 16 (Valuing Our Natural Environment) requires that all developments within 3km of Thorne and Hatfield Moors will be required to demonstrate a net gain in nightjar foraging habitat. This will mitigate for any potential negative impact on nightjar at Thorne and Hatfield Moors.</p> <p>The location of the preferred areas</p>	<p>No Impact Negative impacts of Policy 20 relating to the loss of nightjar foraging habitat will be mitigated by Policy 16.</p> <p>B – Lower Tier Plan Preferred areas of search for sand and gravel will be determined in a lower tier plan. In this plan</p>

Section of document, policies or objectives being screened	Policy Reference / Section Reference	Categorisation in initial screening with explanation	Comments and recommendations where initial screening is Category F or G	Categorisation following detailed consideration of the issues and taking into account changes to plan or policy
		<p>Thorne and Hatfield Moors. Extraction of sand and gravel in close proximity to Thorne and Hatfield Moors has the potential to impact water levels in the Sherwood Sandstone Aquifer and result in a loss of nightjar foraging habitat.</p> <p>Finally there are existing permitted development rights at Hatfield colliery for the extraction of coal including in areas under Thorne and Hatfield Moors. This has the potential to cause subsidence and alter water levels on the site.</p>	<p>for sand and gravel extraction will be determined in a lower tier plan. At this stage it will be necessary to determine if it possible to mitigate for potential negative impacts of sand and gravel extraction on water levels in the Sherwood Sandstone Aquifer. If mitigation is not possible then areas within a certain radius of the moors may have to not be allocated.</p> <p>While the plan supports the development of Hatfield Colliery the implementation of permitted development rights would require an assessment under the habitat regulations to be undertaken.</p>	<p>consideration of the impacts of development on water levels at Thorne and Hatfield Moors will need to be addressed.</p> <p>B – Lower Tier Plan Extension of coal extraction works to areas under Thorne and Hatfield Moors would be subject to an Assessment under the Habitat Regulations.</p>

4.2 Consideration of Air Pollution

4.2.1 Nitrogen deposition is a process whereby nitrogen containing particles present in the air, are incorporated into a habitat. This can happen as particles in the air are dissolved in water and fall as precipitation (wet deposition), or through direct input of particles into the soil (dry deposition). With respect to air pollution the screening exercise undertaken in Table 4 considered the impact of dry deposition of pollutants on Thorne and Hatfield Moors.

4.2.2 The impact of wet deposition of nitrogen and acid on Thorne and Hatfield Moors was highlighted in the Habitat Regulations Assessment of Doncaster's Core Strategy Revised Preferred Options 2010 as an outstanding issue that required further investigation. Wet deposition of pollutants takes place over a long range as once pollutants are incorporated into water they can move in the atmosphere over a significant distance. Further consultation with Natural England has clarified that the wet deposition of pollutants does not need to be considered within this Habitat Regulations Assessment (see quotation from correspondence below).

*"It is correct that local models such ADMS and AERMOD only consider dry deposition of NOx. Wet deposition 'footprints' can be considered via the FRAME model but this is at a national spatial scale and requires further testing for modelling changes in local sources. **Therefore Natural England advise that the Doncaster Core Strategy HRA focuses on assessing and addressing the potential local impacts of the plan, rather than the long-range wet deposition effects.** As such, we concur that the HRA will need to be amended, as you have suggested, to take into account why wet air modelling would not be meaningful for Doncaster.*

The UK Government has international commitments to reduce national emissions of pollutants (under various international agreements such as the National Emissions Ceiling Directive and the Gothenburg Protocol) and to halt biodiversity loss/prevent the deterioration of natural habitats (under the CBD, Habitats Directive Article 6(2)), and looks to Local Authorities to contribute to the achievement of these commitments. We would therefore encourage the local authority to take a preventative approach to reduce the wider impact of air pollution resulting from spatial plans, by including policies that seek to reduce the sources of pollution."¹⁰

¹⁰ Quotation from e-mail correspondence from Zoe Buddle, Lead Adviser in the Local Government Team, Yorkshire & Humber Region, at Natural England dated 11th February 2011.

4.2.3 Consideration of wet deposition of pollutants is not considered appropriate because the sources of pollution that may impact Thorne and Hatfield Moors could be far outside Doncaster's administrative boundary and hence outside the control of the Core Strategy. Instead this assessment focuses on the local impacts of implementing the plan in terms of air pollution.

4.3 Cumulative Impacts

4.3.1 As part of the Habitat Regulations Assessment process it is necessary to consider the cumulative impacts of other plans and project that might have an in combination impact on a European Site. The Appropriate Assessment of Doncaster's Core Strategy Consultation Draft produced in 2008 by Land Use Consultants¹¹ identified other relevant plans and projects and discussed the potential for them to have an in combination impact on a European Site.

4.3.2 In combination effects were ruled out for all issues except that of air pollution from wet deposition. Given the guidance from Natural England outlined in paragraph 4.2.2 it is considered there are no outstanding issues with respect to cumulative impacts from other plans or projects.

4.4 Climate Change

4.4.1 It is generally accepted that the world's climate is likely to change as a result of anthropogenic influences. Models suggest warmer and wetter weather is the most likely scenario to face much of Britain including Doncaster. Thorne and Hatfield Moors are rain fed systems, and while to some extent managing extra rainfall should be possible, hotter drier summers may increase water pressure on the sites and in turn negatively impact the bog habitats.

¹¹ Appropriate Assessment of Doncaster Core Strategy Consultation Draft. October 2008. Land Use Consultants

4.3.2 Experts expect that our climate will change and there is very little that Doncaster, acting alone, is going to be able to do to prevent this from happening. That said it is considered that the Core Strategy Revised Preferred Options do consider climate change and includes measures to limit its effects. For example Policy 2 encourages new housing and employment sites to be developed in sustainable locations, close to existing facilities and therefore reducing the need to travel by car. Policy 14 requires new developments to be both designed to be able to adapt to climate change but also to contribute towards reducing the causes of climate change. Policies 16 and 17 seek to encourage development of habitat networks that will be more robust to future climate changes and renewable energy generation is encouraged in policy 19.

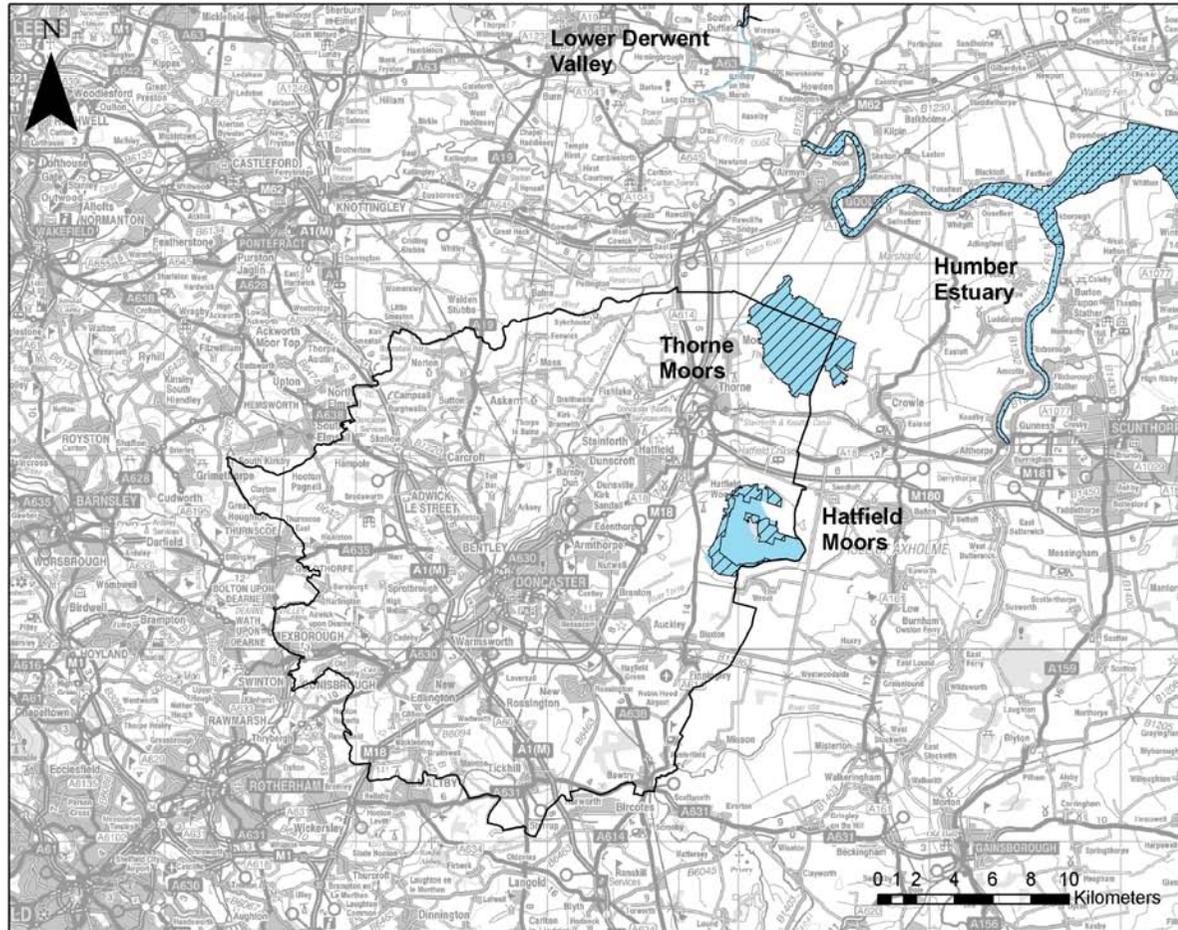
4.3.3 It is therefore considered that while the policies within the document are not able to remove the potential threat from climate change faced by European sites, they do go some way towards reducing the causes of climate change and look for ways to make the sites more robust to the changes in climate that are expected.

4.4 Recommendations

4.4.1 No further work is recommended with respect to the Core Strategy Habitat Regulations Assessment. Subsequent plans and projects will however require consideration under the Habitats Directive, such as the Allocations Development Plan Document, Green Belt review and individual planning applications.

Appendix 1

Map showing locations of European Sites



 Doncaster Metropolitan Borough Council	
Key :  Special Protection Area  Special Area of Conservation  RAMSAR Site	
Title : Location of European Sites	
Notes :	
Date : 22 July 2010	
Scale : 1:275,000	

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