

# Redruth Neighbourhood Plan

Report to Inform Habitats Regulations Assessment

Redruth Town Council

November 2023

### Quality information

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# 1. Introduction

## Background to the Project

- 1.1 AECOM has been appointed by Redruth Neighbourhood Plan Forum to assist in producing a report to inform the Local Planning Authority's (Cornwall Council) Habitats Regulations Assessment (HRA) of the potential effects of the Neighbourhood Plan for Penzance Parish on internationally designated wildlife sites. The objectives of the assessment are to:
  - Identify any aspects of the Neighbourhood Plan that would cause an adverse effect on the integrity of international sites (Special Areas of Conservation (SACs), Special Protection Areas (SPAs)) including, as a matter of Government policy, Ramsar sites, either in isolation or in combination with other plans and projects, and
  - To advise on appropriate policy mechanisms for delivering mitigation where such effects were identified.
- 1.2 The HRA of the Redruth Neighbourhood Plan is required to determine if there are any realistic linking pathways present between an international site and the Neighbourhood Plan and where Likely Significant Effects (LSEs) cannot be screened out, an analysis to inform Appropriate Assessment (AA) to be undertaken to determine if adverse effects on the integrity of the international sites will occur as a result of the Neighbourhood Plan alone or in combination.

## Legislation

- 1.3 The need for HRA is set out in the Conservation of Habitats & Species Regulations 2017 (as amended). See Box 1.
- 1.4 Its ultimate aim is to “*maintain or restore, at favourable conservation status, natural habitats and species of wild fauna and flora of Community interest*”. This aim relates to habitats and species, not the European sites themselves, although the sites have a significant role in delivering favourable conservation status. European sites are defined as actual or proposed/candidate Special Areas of Conservation (SAC) or Special Protection Areas (SPA). It is also Government policy for sites designated under the Convention on Wetlands of International Importance (Ramsar sites) to be treated as having equivalent status to European sites.

## Box 1: The legislative basis for Appropriate Assessment

### Conservation of Habitats and Species Regulations 2017 (as amended)

With specific reference to Neighbourhood Plans, Regulation 106(1) states that:

*“A qualifying body which submits a proposal for a neighbourhood development plan must provide such information as the competent authority [the Local Planning Authority] may reasonably require for the purpose of the assessment under regulation 105... [which sets out the formal process for determination of ‘likely significant effects’ and the appropriate assessment].”*

- 1.5 Therefore, it is important to note that this report has two purposes:
- To assist the Qualifying Body (the Neighbourhood Plan Group) in preparing their plan by recommending (where necessary) any adjustments required to protect European sites, thus making it more likely their plan will be deemed compliant with the Conservation of Habitats and Species Regulations 2017 (as amended); and
  - On behalf of the Qualifying Body, to assist the Local Planning Authority to discharge their duty under Regulation 105 (in their role as ‘plan-making authority’ within the meaning of that regulation) and Regulation 106 (in their role as ‘competent authority’).
- 1.6 As ‘competent authority’, the legal responsibility for ensuring that a decision of ‘likely significant effects’ is made, for ensuring an ‘appropriate assessment’ (where required) is undertaken, and for ensuring Natural England are consulted, falls on the local planning authority. However, they are entitled to request from the Qualifying Body the necessary information on which to base their judgment and that is a key purpose of this report.
- 1.7 The Habitats Regulations applies the precautionary principle to European sites (SACs and SPAs). As a matter of UK Government policy, Ramsar sites are given equivalent status. For the purposes of this assessment candidate SACs (cSACs), proposed SPAs (pSPAs) and proposed Ramsar (pRamsar) sites are all treated as fully designated sites. In this report we use the term ‘European sites’ to refer collectively to the sites listed in this paragraph.
- 1.8 Plans and projects can only be permitted having ascertained that there will be no adverse effect on the integrity of the site(s) in question. This contrasts with the SEA Directive which does not prescribe how plan or programme proponents should respond to the findings of an environmental assessment; merely that the assessment findings (as documented in the ‘environmental report’) should be ‘taken into account’ during preparation of the plan or programme. Under the Habitats Regulations, plans and projects may still be permitted if there are no alternatives to them and there are Imperative Reasons of Overriding Public Interest (IROPI) as to why they should go ahead. In such cases, compensation would be necessary to ensure the overall integrity of the site network.
- 1.9 In 2018, the ‘People Over Wind’ European Court of Justice (ECJ) ruling<sup>1</sup> determined that ‘mitigation’ (i.e. measures that are specifically introduced to avoid or reduce the harmful effects of a plan or project on European sites) should not be taken into account when forming a view on likely significant effects. Mitigation should instead only be considered at the appropriate assessment

stage. Appropriate assessment is not a technical term: it simply means ‘an assessment that is appropriate’ for the plan or project in question. As such, the law purposely does not prescribe what it should consist of or how it should be presented; these are decisions to be made on a case by case basis by the competent authority. An amendment was made to the Neighbourhood Planning Regulations in late 2018 which permitted Neighbourhood Plans to be made if they required appropriate assessment.

- 1.10 Over the years the phrase ‘Habitats Regulations Assessment’ has come into wide currency to describe the overall process set out in the Conservation of Habitats and Species Regulations from screening through to Imperative Reasons of Overriding Public Interest (IROPI). This has arisen in order to distinguish the process from the individual stage described in the law as an ‘Appropriate Assessment’. Throughout this report we use the term Habitats Regulations Assessment for the overall process.

## Report Layout

- 1.11 **Chapter 2** of this report explains the process by which the HRA has been carried out. **Chapter 3** explores the relevant pathways of impact. **Chapter 4** summarises the Test of Likely Significant Effects of the policies and site allocations of the Plan considered ‘alone’ and ‘in-combination. (The Test of Likely Significant Effects itself is undertaken in **Appendix B**). **Chapter 5** contains the Appropriate Assessment for any linking impact pathways that could not be screened out from potentially resulting in a Likely Significant Effect. **Chapter 6** contains the conclusion and a summary of recommendations.

## 2. Methodology

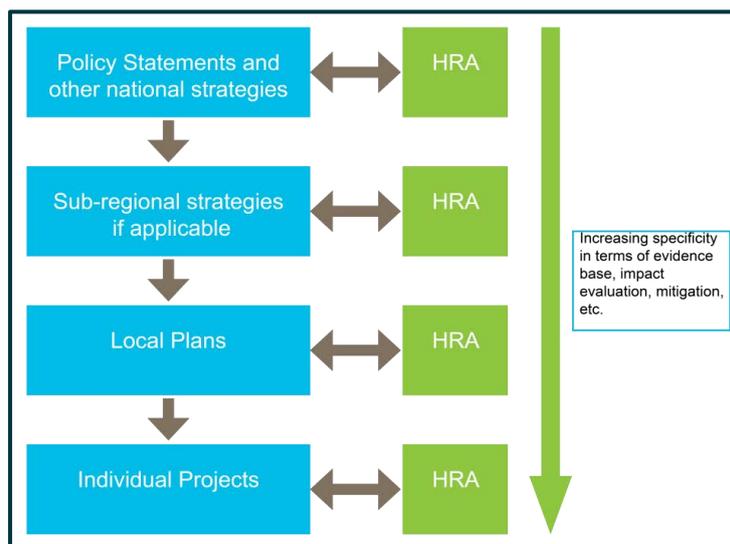
### Introduction

- 2.1 This section sets out the approach and methodology for undertaking the Habitats Regulations Assessment (HRA). HRA itself operates independently from the Planning Policy system, being a legal requirement of a discrete Statutory Instrument. Therefore, there is no direct relationship to the National Planning Policy Framework (NPPF) and the ‘Tests of Soundness’.

### A Proportionate Assessment

- 2.2 Project-related HRA often requires bespoke survey work and novel data generation in order to accurately determine the significance of effects. In other words, to look beyond the risk of an effect to a justified prediction of the actual likely effect and to the development of avoidance or mitigation measures.
- 2.3 However, the draft DLUHC guidance<sup>ii</sup> (described in greater detail later in this chapter) makes it clear that when implementing HRA of land-use plans, the Appropriate Assessment (AA) should be undertaken at a level of detail that is appropriate and proportional to the level of detail provided within the plan itself:
- 2.4 *“The comprehensiveness of the [Appropriate] assessment work undertaken should be proportionate to the geographical scope of the option and the nature and extent of any effects identified. An AA need not be done in any more detail, or using more resources, than is useful for its purpose. It would be inappropriate and impracticable to assess the effects [of a strategic land use plan] in the degree of detail that would normally be required for the Environmental Impact Assessment (EIA) of a project.”*
- 2.5 More recently, the Court of Appeal<sup>iii</sup> ruled that providing the Council (competent authority) was duly satisfied that proposed mitigation could be *“achieved in practice”* then this would suffice to meet the requirements of the Habitat Regulations. This ruling has since been applied to a planning permission (rather than a Plan document)<sup>iv</sup>. In this case the High Court ruled that for *“a multistage process, so long as there is sufficient information at any particular stage to enable the authority to be satisfied that the proposed mitigation can be achieved in practice it is not necessary for all matters concerning mitigation to be fully resolved before a decision maker is able to conclude that a development will satisfy the requirements of reg 61 of the Habitats Regulations”*.
- 2.6 In other words, there is a tacit acceptance that AA can be tiered and that all impacts are not necessarily appropriate for consideration to the same degree of detail at all tiers as illustrated in **Box 2**.

## Box 2: Tiering in HRA of Land Use Plans

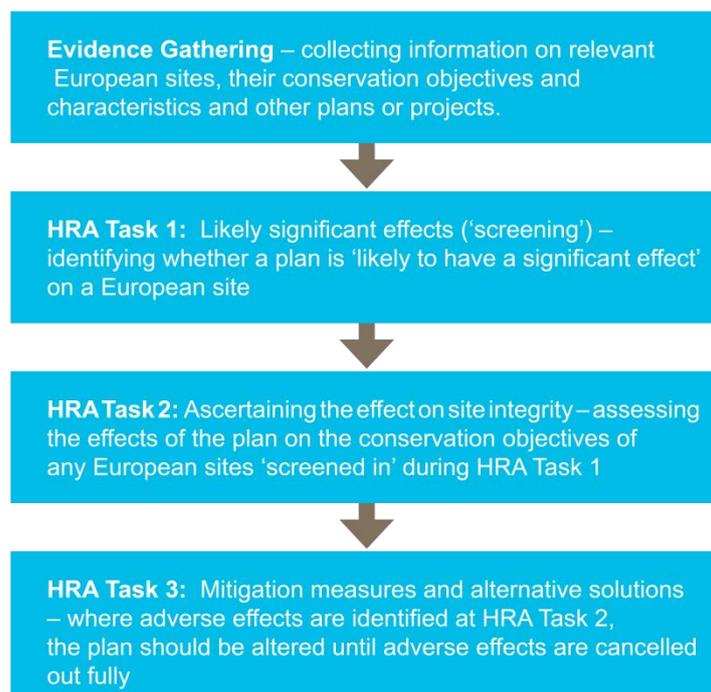


- 2.7 For a plan the level of detail concerning the developments that will be delivered is usually insufficient to make a highly detailed assessment of significance of effects. For example, precise and full determination of the impacts and significant effects of a new settlement will require extensive details concerning the design of the new housing sites, including layout of greenspace and type of development to be delivered in particular locations, yet these data will not be decided until subsequent stages.
- 2.8 The most robust and defensible approach to the absence of fine grain detail at this level is to make use of the precautionary principle. In other words, the plan is never given the benefit of the doubt (within the limits of reasonableness); it must be assumed that a policy/measure is likely to have an impact leading to a significant adverse effect upon an internationally designated site unless it can be clearly established otherwise.

## The Process of HRA

- 2.9 The HRA is being carried out in the continuing absence of formal central Government guidance. The former DCLG (now DLUHC) released a consultation paper on AA of Plans in 2006<sup>v</sup>. As yet, no further formal guidance has emerged on the assessment of plans. However, Natural England has produced its own informal internal guidance and central government have released general guidance on appropriate assessment<sup>vi</sup>.
- 2.10 **Box 3** outlines the stages of HRA according to the draft DLUHC guidance (which, as government guidance applicable to English authorities is considered to take precedence over other sources of guidance). The stages are essentially iterative, being revisited as necessary in response to more detailed information, recommendations and any relevant changes to the plan until no likely significant effects remain.

### Box 3: Four-Stage Approach to Habitats Regulations Assessment



2.11 The following process has been adopted for carrying out the subsequent stages of the HRA.

### Task One: Test of Likely Significant Effect (LSEs)

2.12 The first stage of any Habitats Regulations Assessment is a test of Likely Significant Effect - essentially a high-level assessment to decide whether the full subsequent stage known as Appropriate Assessment is required. The essential question is:

*“Is the Plan, either alone or in combination with other relevant projects and plans, likely to result in a significant effect upon European sites?”*

2.13 In evaluating significance, AECOM have relied on professional judgment and experience of working with other local authorities on similar issues. The level of detail concerning developments that will be permitted under land use plans is rarely sufficient to make a detailed quantification of effects. Therefore, a precautionary approach has been taken (in the absence of more precise data) assuming as the default position that if a likely significant effect (LSE) cannot be confidently ruled out, then the assessment must be taken the next level of assessment Task Two: Appropriate Assessment. This is in line with the April 2018 court ruling relating to 'People Over Wind' where mitigation and avoidance measures are to be included at the next stage of assessment.

### Task Two: Appropriate Assessment

2.14 European Site(s) which have been 'screened in' during the previous Task have a detailed assessment undertaken on the effect of the policies on the European

site(s) site integrity. Avoidance and mitigation measures to avoid adverse significant effects are taken into account or recommended where necessary.

- 2.15 As established by case law, ‘appropriate assessment’ is not a technical term; it simply means whatever further assessment is necessary to confirm whether there would be adverse effects on the integrity of any European sites that have not been dismissed at screening. Since it is not a technical term it has no firmly established methodology except that it essentially involves repeating the analysis for the likely significant effects stage, but to a greater level of detail on a smaller number of policies and sites, this time with a view to determining if there would be adverse effects on integrity.
- 2.16 One of the key considerations during Appropriate Assessment is whether there is available mitigation that would entirely address the potential effect. In practice, the Appropriate Assessment takes any policies or allocations that could not be dismissed following the high-level Screening analysis and analyse the potential for an effect in more detail, with a view to concluding whether there would actually be an adverse effect on integrity (in other words, disruption of the coherent structure and function of the European site(s)).

## The Scope

- 2.17 There is no guidance that dictates the physical scope of an HRA of a plan. Therefore, in considering the physical scope of the assessment we were guided primarily by the identified impact pathways rather than by arbitrary “zones”, i.e. a source-pathway-receptor approach. Current guidance suggests that the following European sites be included in the scope of assessment:
- All sites within the Neighbourhood Plan area boundary; and
  - Other sites shown to be linked to development within the Neighbourhood Plan boundary through a known “pathway” (discussed below).
- 2.18 Briefly defined, pathways are routes by which a change in activity within the plan area can lead to an effect upon a European site. In terms of the second category of European site listed above, DLUHC guidance states that the AA should be “*proportionate to the geographical scope of the [plan policy]*” and that “*an AA need not be done in any more detail, or using more resources, than is useful for its purpose*” (DLUHC, 2006, p.6).
- 2.19 Full details of all European designated sites discussed in this document can be found in **Appendix A**, specifying their qualifying features, conservation objectives and threats to integrity. Table 1 below lists all those European designated sites included in this HRA. It is to be noted that the inclusion of a

European sites or pathway below does not indicate that an effect is expected but rather that these are pathways that will be investigated.

**Table 1. Physical Scope of the HRA**

European Designated Site	Location	Distance	Reason for inclusion (pressures/threats <sup>vii</sup> associated with the European site that could link to the Plan)	Other site vulnerabilities not connected to the Neighbourhood Plan
Bristol Channel Approaches SAC	At its closest point 1.8 km north of the Neighbourhood Area	-	None	- Pollution
Godrevy Head to St Agnes SAC	At its closest point 2.5 km north of the Neighbourhood Area	-	None	- Air pollution
Carrine Common SAC	At its closest point 7.2 km east of the Neighbourhood Area	-	None	- Recreation - Air pollution
Fal and Helford SAC	At its closest point 10 km south east of the Neighbourhood Area	-	The Neighbourhood Area is within the SAC zone of influence for recreational pressure as identified in the Terrestrial European Sites Mitigation Supplementary Planning Document (SPD) <sup>viii</sup> .	- Pollution to groundwater - Invasive non-native species - Outdoor sports and leisure activities, recreational activities - Other human intrusions and disturbances - Shipping lanes, ports, marine constructions
Penhale Dunes SAC	At its closest point 10.7 km north east of the Neighbourhood Area	-	The Neighbourhood Area is within the SAC zone of influence for recreational pressure as identified in the Terrestrial European Sites Mitigation Supplementary Planning Document (SPD).	- Modification of cultivation practices - Human induced changes in hydraulic conditions - Invasive non-native species - Outdoor sports and leisure activities, recreational activities

## The ‘In Combination’ Scope

2.20 It is a requirement of the Regulations that the impacts and effects of any land use plan being assessed are not considered in isolation but in combination with other

plans and projects that may also be affecting the European designated site(s) in question.

- 2.21 When undertaking this part of the assessment it is essential to bear in mind the principal intention behind the legislation i.e. to ensure that those projects or plans which in themselves have minor impacts are not simply dismissed on that basis but are evaluated for any cumulative contribution they may make to an overall significant effect. In practice, in combination assessment is therefore of greatest relevance when the plan would otherwise be screened out because its individual contribution is inconsequential. The overall approach is to exclude the risk of there being unassessed likely significant effects in accordance with the precautionary principle. This was first established in the seminal Waddenzee<sup>ix</sup> case.
- 2.22 For the purposes of this HRA, we have determined that the key other documents with a potential for in-combination effects are the Adopted Cornwall Local Plan (2016) and its associated Site Allocations Development Plan Document (DPD)<sup>x</sup>. As outlined in the introduction, this Plan sets out the broad spatial development targets for the County of Cornwall in the period of 2010 – 2030. Cornwall does not have individual districts and unitary authorities and the Plan therefore covers a broad geographical area including 213 parishes.
- 2.23 While individual planning applications have been submitted and in some cases permitted since the Cornwall Local Plan was adopted, examination of planning applications only provides a snapshot in time. In contrast, a review of the Local Plan and its allocations provides the fullest overall picture of the most significant housing and employment development that will be delivered between 2010 and 2030. Overall, the (previously modified) and adopted Local Plan provides for a minimum of 52,500 homes at an average of 2,625 homes delivered per year, 318 permanent gypsy and traveller pitches and 704,000 m<sup>2</sup> of employment floorspace. Within the Plan, the residential and employment growth is partitioned into various Community Network Areas (CNAs). For example, the Camborne, Pool, Illogan and Redruth CNA provides for 6,200 additional residential dwellings and 122,250m<sup>2</sup> of employment space. The growth provided in other CNAs is provided in Table 2.
- 2.24 The Cornwall Local Plan is associated with the following impact pathways: recreational pressure, water quality and atmospheric pollution, and as such the same impact pathways that link the Redruth Neighbourhood Plan to nearby European sites. Given the extent of development, both in terms of its volume and geographical distribution, that it proposes, the Cornwall Local Plan and the Site Allocations DPD (and its HRAs) are the most important documents to consider in assessing the in-combination effect of the Redruth Neighbourhood Plan.
- 2.25 As shown in the table, residential growth in the Csmborne, Pool, Illogan and Redruth CNA accounts for 12% of the total residential growth in Cornwall, while its employment growth accounts for 17% of the overall employment growth in Cornwall. This is the largest residential and employment growth allocated within the Cornwall local plan. Therefore, the potential for Redruth's contribution to an in-combination effect arising from increased development throughout Cornwall, must be considered.

**Table 2. Summary of the development (residential and employment growth) allocated in parishes within the Adopted Cornwall Local Plan (2016).**

Location (CNA)	Residential Growth (dwellings)	Employment growth (m <sup>2</sup> of floorspace)
Penzance and West Penwith	3,150	32,166
Truro and Roseland	5,100	69,583
Hayle and St. Ives	3,180	38,166
Helston	2,300	29,417
<b>Camborne, Pool, Illogan and Redruth</b>	<b>6,200</b>	<b>122,250</b>
Falmouth and Penryn	3,400	47,417
St. Agnes, Perranporth and Newquay	4,800	58,000
Eco-Communities and St. Austell	3,200	22,250
St. Blazey, Fowey, and Lostwithiel	900	25,333
China Clay	1,800	26,250
Wadebridge and Padstow	2,100	13,334
Bodmin	3,200	47,500
Camelford	1,000	7,834
Bude, Stratton, Flexbury and Poughill	1,800	21,166
Lanceston	2,300	42,250
Liskeard	2,900	44,334
Callington and Caradon	1,000	14,750
Saltash, Torpoint and Cornwall Gateway	1,900	17,500
<b>All CNAs</b>	<b>52,500</b>	<b>704,000</b>

2.26 It should be noted that, while the broad potential impacts of the Cornwall Local Plan will be considered as part of the 'in combination' assessment, this document does not carry out a full HRA of that Plan. Instead, it draws upon existing HRAs that have been carried out on the Plan and the Site Allocations DPD between 2014 and its adoption in 2016.

## 3. Pathways of Impact

3.1 The following pathways of impact are considered relevant to the HRA of the Plan:

- Recreational Pressure

### Recreational Pressure

3.2 Recreational use of a European site has the potential to:

- Cause disturbance to sensitive species, particularly ground-nesting birds and (where relevant) wintering wildfowl.
- Cause damage through erosion and fragmentation;
- Cause eutrophication as a result of dog fouling; and
- Prevent appropriate management or exacerbate existing management difficulties;

3.3 Different types of European sites are subject to different types of recreational pressures and have different vulnerabilities. Studies across a range of species have shown that the effects from recreation can be complex.

3.4 It should be emphasised that recreational use is not inevitably a problem. Many European sites also contain nature reserves managed for conservation and public appreciation of nature.

3.5 HRAs of Local Plans tend to focus on recreational sources of disturbance as a result of new residents<sup>xi</sup>.

### Activities causing disturbance

3.6 Disturbing activities are on a continuum. The most disturbing activities are likely to be those that involve irregular, infrequent, unpredictable loud noise events, movement or vibration of long duration. The presence of people and dogs generate a substantial disturbance effects because of the areas accessed and the impact of a potential predator on bird behaviour. Birds are least likely to be disturbed by activities that involve regular, frequent, predictable, quiet patterns of sound or movement or minimal vibration. The further any activity is from the birds, the less likely it is to result in disturbance.

3.7 The factors that influence a species response to a disturbance are numerous, but the three key factors are species sensitivity, proximity of disturbance sources and timing/duration of the potentially disturbing activity.

3.8 The distance at which a species takes flight when approached by a disturbing stimulus is known as the 'tolerance distance' (also called the 'escape flight distance') and differs between species to the same stimulus and within a species to different stimuli.

3.9 The potential for apparent disturbance may be less in winter than in summer, in that there are often a smaller number of recreational users. In addition, the consequences of disturbance at a population level may be reduced because birds are not breeding. However, activity outside of the summer months can still cause important disturbance, especially as birds are particularly vulnerable at

this time of year due to food shortages. Disturbance which results in abandonment of suitable feeding areas can have severe consequences for those birds involved and their ability to find alternative feeding areas. Several empirical studies have, through correlative analysis, demonstrated that out-of-season (October-March) recreational activity can result in quantifiable disturbance:

- Tuite et al<sup>xii</sup> found that during periods of high recreational activity, bird numbers at Llangorse Lake decreased by 30% as the morning progressed, matching the increase in recreational activity towards midday. During periods of low recreational activity, however, no change in numbers was observed as the morning progressed. In addition, all species were found to spend less time in their 'preferred zones' (the areas of the lake used most in the absence of recreational activity) as recreational intensity increased;
- Underhill et al<sup>xiii</sup> counted waterfowl and all disturbance events on 54 water bodies within the South West London Water Bodies Special Protection Area and clearly correlated disturbance with a decrease in bird numbers at weekends in smaller sites and with the movement of birds within larger sites from disturbed to less disturbed areas.

3.1 Human activity can affect birds either directly (e.g. through causing them to flee) or indirectly (e.g. through damaging their habitat). The most obvious direct effect is that of immediate mortality such as death by shooting, but human activity can also lead to behavioural changes (e.g. alterations in feeding behaviour, avoidance of certain areas *etc.*) and physiological changes (e.g. an increase in heart rate) that, although less noticeable, may ultimately result in major population-level effects by altering the balance between immigration/birth and emigration/death<sup>xiv</sup>. The impact of disturbance on birds changes during the seasons in relation to a number of very specific factors, for example the winter below freezing temperature, the birds fat resource levels and the need to remain watchful for predators rather than feeding. These considerations lead to birds apparently showing different behavioural responses at different times of the year.

3.2 The degree of impact that varying levels of noise will have on different species of bird is poorly understood except that a number of studies have found that an increase in traffic levels on roads does lead to a reduction in the bird abundance within adjacent hedgerows - Reijnen et al (1995) examined the distribution of 43 passerine species (i.e. 'songbirds'), of which 60% had a lower density closer to the roadside than further away. By controlling vehicle usage, they also found that the density generally was lower along busier roads than quieter roads<sup>xv</sup>.

## **Mechanical/abrasive damage and nutrient enrichment**

3.3 Most types of aquatic or terrestrial European site can be affected by trampling, which in turn causes soil compaction and erosion:

- Wilson & Seney (1994)<sup>xvi</sup> examined the degree of track erosion caused by hikers, motorcycles, horses and cyclists from 108 plots along tracks in the Gallatin National Forest, Montana. Although the results proved difficult to interpret, it was concluded that horses and hikers disturbed more sediment on wet tracks, and therefore caused more erosion, than motorcycles and bicycles.

- Cole et al (1995a, b)<sup>xvii</sup> conducted experimental off-track trampling in 18 closed forest, dwarf scrub and meadow & grassland communities (each tramped between 0 – 500 times) over five mountain regions in the US. Vegetation cover was assessed two weeks and one year after trampling, and an inverse relationship with trampling intensity was discovered, although this relationship was weaker after one year than two weeks indicating some recovery of the vegetation. Differences in plant morphological characteristics were found to explain more variation in response between different vegetation types than soil and topographic factors. Low-growing, mat-forming grasses regained their cover best after two weeks and were considered most resistant to trampling, while tall forbs (non-woody vascular plants other than grasses, sedges, rushes and ferns) were considered least resistant. Cover of hemicryptophytes and geophytes (plants with buds below the soil surface) was heavily reduced after two weeks but had recovered well after one year and as such these were considered most resilient to trampling. Chamaephytes (plants with buds above the soil surface) were least resilient to trampling. It was concluded that these would be the least tolerant of a regular cycle of disturbance.
  - Cole (1995c)<sup>xviii</sup> conducted a follow-up study (in 4 vegetation types) in which shoe type (trainers or walking boots) and trampler weight were varied. Although immediate damage was greater with walking boots, there was no significant difference after one year. Heavier trampers caused a greater reduction in vegetation height than lighter trampers, but there was no difference in effect on cover.
  - Cole & Spildie (1998)<sup>xix</sup> experimentally compared the effects of off-track trampling by hiker and horse (at two intensities – 25 and 150 passes) in two woodland vegetation types (one with an erect forb understorey and one with a low shrub understorey). Horse traffic was found to cause the largest reduction in vegetation cover. The forb-dominated vegetation suffered greatest disturbance but recovered rapidly. Higher trampling intensities caused more disturbance.
- 3.4 Walkers with dogs contribute to pressure on sites through nutrient enrichment via dog fouling and also cause greater disturbance to fauna as dogs are less likely to keep to marked footpaths and also tend to move in a more erratic manner. Sites being managed by nature conservation bodies and local authorities frequently resort to hardening eroded paths to restrict erosion but at the same time they are losing the habitats formerly used by sand lizards and burrowing invertebrates. Motorcycle scrambling and off-road vehicle use can cause more serious erosion, as well as disturbance to sensitive species. Boats can also cause some mechanical damage to intertidal habitats through grounding as well as anchor and anchor line damage.

## 4. Test of Likely Significant Effects (LSEs)

### Introduction

- 4.1 The initial scoping of European designated sites illustrated in Table 1 identified that Penhale Dunes SAC and Fal and Helford SAC sites are potentially vulnerable to:
- Recreational pressure
- 4.2 The European Sites Mitigation SPD<sup>xx</sup> identifies there is a 12.5km recreational catchment to Penhale Dunes SAC and Fal & Helford SAC. The Redruth Neighbourhood Area is located partially within both catchments. Any developments within the respective areas would result in payment required to the mitigation strategy for those sites.
- 4.3 The full test of LSEs for the Redruth Neighbourhood Plan is presented in Appendix B. The assessment took into consideration the above potential vulnerabilities of the European sites included in Table 1.

### Summary of LSEs 'Alone'

- 4.4 For the following 11 policies within the Redruth Neighbourhood Plan LSEs on European sites cannot be excluded 'alone'. These policies are:
- Policy HS3: Affordable Housing Led Schemes
  - Policy HS4: Mixed Development Schemes
  - Policy HS5: Conversion of Residential Garages.
  - Policy T3: Upper Floors and the rear of Town Centre buildings
  - Policy T4: Fairmeadow Retail allocation review
  - Policy T5: Redruth Brewery Site re-development
- 4.5 Although these policies do not propose a specific quantum of development, they do propose developing and rejuvenating previously used facilities and buildings or developing new buildings and residential dwellings based on certain criteria provided in the Neighbourhood Plan.
- 4.6 Fal and Helford SAC (10km south) and Penhale Dunes SAC (10.7km north east) are vulnerable to recreational pressure. The European Sites Mitigation SPD identifies there is a 12.5km recreational catchment to Penhale Dunes SAC and Fal & Helford SAC. The Redruth neighbourhood plan area is located partially within both catchment areas. Any developments within the respective areas would result in payment required to the mitigation strategy for those sites.
- 4.7 Policies considered to have an effect on European sites only 'in combination' with other plans and projects are discussed below.

## Summary of LSEs ‘In Combination’

4.8 Of the 66 Neighbourhood Plan policies, 5 policies, were considered not considered to pose likely significant effects alone, but did have the potential to result in LSEs in combination with other plans and projects, including the existing Local Plan policies and allocations:

- BE2: New Business Development
- Policy H4: Linking Mining assets to the Town Centre

4.9 The above policies provide for the following realistic potential linking impact pathways that could result in LSEs on European sites in combination:

- Recreational pressure: as a result of new residential dwellings, business development and tourist facilities.

4.10 All remaining policies are development management policies that do not provide impact pathways that link to European sites. The impact pathways screened in for these policies are discussed further below, to determine whether a likely significant effect can in fact be dismissed.

## Recreational pressure

### Penhale Dunes SAC<sup>xxi</sup>

4.11 Cornwall Council undertook a visitor study of Penhal Dunes SAC between 2015 and 2016 in support of its Terrestrial European Sites Mitigation Supplementary Planning Document (SPD)<sup>xxii</sup>. The visitor survey results concluded: *“Over the four seasons, 406 groups were interviewed, representing 706 people and 696 dogs. Overall 87% of visitors lived in Cornwall and 13% were visitors. 95% of local visitors and 79% of non-resident visitors were dog walking. As expected a higher number of visitors who lived outside Cornwall were interviewed in Summer compared to those interviewed over the Winter survey sessions (28% compared to 1%) 95% of local visitors arrived by car. For tourists the split was closer to 50:50 because 55% arrived on foot from Penhale Sands, the campsite adjoining the SAC. Across the seasons Penhale was specifically visited by some local residents in preference to other destinations, as they considered it to be large, level, dry and dog friendly, with easy parking and the ability to let the dog off the lead safely. 64% of visitors stated that they visit all year round. Local resident groups who were dog walking were the most frequent visitors to the site. 32% of local resident visitors resided in the Civil Parish of Perranzabuloe, 12% in Truro, 8% in Newquay and 6% in Kenwyn. 14 postcodes of holiday accommodation from non-local resident visitor groups were captured and were all located in the Civil Parish of Perranzabuloe. In light of a 23% increase in housing within 12,500m of Penhale, a 21% predicted increase in recreational visits is expected. This could increase recreational pressure on the site to the extent that there may be significant effects, if not mitigated. The data gathered from the visitor field work has been analysed to identify zone of influence around Penhale of 12.5km.”.*

### Fal and Helford SAC

4.12 Cornwall Council also undertook a visitor study of Fal and Helford SAC between 2015 and 2016 in support of its Terrestrial European Sites Mitigation Supplementary Planning Document (SPD). The visitor survey results concluded:

*“Over the four seasons 1437 interviews were carried out. The results of the surveys show that the area is under most pressure from visits in the Summer, Autumn and Spring and each have similar levels of activity. Visitors are mainly local to Cornwall (approx. 60%), with highest numbers of visitors from further afield arriving in Summer. Very low numbers of visitors were generally found in Winter. Numbers of visitors also varies between sites. Based on the number of people interviewed (i.e. the total number of people partaking in surveys, rather than the number of surveys), the site visited most (St Mawes, 647 people) receives double the number of visitors of the site visited least (Malpas, 316 people). On average 69% of people agreed to be interviewed across the sites and seasons. Overall, terrestrial activities are the most common activities undertaken, however this varies across sites, with certain sites being preferred for water-based activities. The most popular marine activities were canoeing/kayaking, motor yachting and sailing yachting, which is reflected in the tallies. The tallies also show a high number of paddle-boarders and swimmers, which are not identified in the questionnaires. Visit intensity in terms of frequency and duration varies across sites. Patterns of local and non-local visitors vary, with non-locals being more likely to visit less frequently. Visit duration varies more between sites than it seems to vary between local/non-local visitors, most likely connected to preferred activities.”*

## Godrevy Head to Agnes SAC

4.13 A study was also carried out at Godrevy Head to Agnes SAC between 2015 and 2016 in support of its Terrestrial European Sites Mitigation Supplementary Planning Document (SPD). The visitor study concluded that the site was not susceptible to impact as a result of recreational pressure.

## Conclusion

4.14 As no sites have been directly allocated for development, all polices could be screened out of appropriate assessment. Any future proposed developments will be required to complete a HRA assessment to ensure there are no adverse impacts on protected sites.

4.15 The European Sites Mitigation SPD identifies there is a 12.5km recreational catchment to Penhale Dunes SAC and Fal & Helford SAC. The Redruth neighbourhood plan area is located partially within both catchment areas. Any developments within the respective areas would result in payment required to the mitigation strategy for those sites as shown in table 3.

**Table 3 Mitigation tariffs as set out by the Terrestrial European Sites Mitigation Supplementary Planning Document (SPD)**

Site Name	Cost per unit	Cost per bedroom for student services/ accommodation provision
<b>Fal and Helford SAC</b>	£352	£147
<b>Penhale Dunes SAC</b>	£180	£75

## 5. Conclusions

- 5.1 This assessment undertook both screening of the policies and any allocations within the Redruth Neighbourhood Plan.
- 5.2 Impact pathways considered were:
  - recreational pressure
- 5.3 As no sites have been directly allocated for development, all policies could be screened out of appropriate assessment.
- 5.4 Any proposed developments will be required to complete a HRA assessment to ensure there are no adverse impacts on protected sites.
- 5.5 The European Sites Mitigation SPD identifies there is a 12.5km recreational catchment to Penhale Dunes SAC and Fal & Helford SAC. The Redruth neighbourhood plan area is located partially within both catchment areas. Any developments within the respective areas would result in payment required to the mitigation strategy for those sites.
- 5.6 It is recommended that the Redruth Neighbourhood plan state that any planning application for housing will need to ensure it provides a HRA and suitable mitigation as identified in the Cornwall European sites SPD.**
- 5.7 It can therefore be concluded that the Redruth Neighbourhood Plan will not have an adverse effect on the integrity of any European sites in Cornwall, either alone or in combination with other plans and projects.

# Appendix A European Sites

## Bristol Channel Approaches SAC<sup>xxiii</sup>

### Introduction

The Bristol Channel Approaches SAC lies along the south-west coasts of Wales and England. This site straddles the Bristol Channel from Carmarthen Bay in the north to the northern coasts of Devon and Cornwall in the south. Designated for the protection of harbour porpoise (*Phocoena phocoena*), this site supports an estimated 4.7% of the UK Celtic and Irish Sea (CIS) Management Unit (MU) population. This site is recognised as important for porpoises particularly during the winter when high densities persistently occur throughout the site.

### Conservation Objectives

Ensure that the integrity of the site is maintained and that it makes the best possible contribution to maintaining Favourable Conservation Status (FCS) for harbour porpoise in UK waters. In the context of natural change, this will be achieved by ensuring that:

- Harbour porpoise is a viable component of the site.
- There is no significant disturbance of the species.
- The condition of supporting habitats and processes, and the availability of prey is maintained.

### Qualifying Features

Annex II species that are a primary reason for selection of this site:

- Harbour porpoise (*Phocoena phocoena*)

### Threats and pressures

- Other ecosystem modifications
- Fishing and harvesting aquatic resources
- Marine water pollution
- Shipping lanes, ports, marine constructions
- Exploration and extraction of oil or gas
- Military use and civil unrest

## Carrine Common SAC<sup>xxiv</sup>

### Introduction

The site supports a variety of habitats, ranging from western lowland heath, scrub and herb-rich hay meadows on drier slopes, to low-lying areas with impeded drainage, which support wet heath, willow *Salix spp.* carr, streamside and mire vegetation. Carrine Common supports dry dwarf shrub heath, dominated by heather (*Calluna vulgaris*), bell heather *Erica cinerea*, western gorse (*Ulex gallii*) and bristle bent (*Agrostis curtisii*). Dorset heath (*Erica ciliaris*), is locally dominant in the southeast of the Common. This is the largest population of Dorset heath in Cornwall, and is unusual in that it occurs here in dry rather than wet heath.

### Conservation Objectives<sup>xxv</sup>

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

- The extent and distribution of qualifying natural habitats
- The structure and function (including typical species) of qualifying natural habitats, and
- The supporting processes on which qualifying natural habitats rely

### Qualifying Features

Annex I habitats that are a primary reason for selection of this site:

- Temperate Atlantic wet heaths with *Erica ciliaris* and *Erica tetralix*

Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site:

- European dry heaths

### Threats and pressures

- Air pollution, air-borne pollutants
- Biocenotic evolution, succession

- Other human intrusions and disturbances
- Outdoor sports and leisure activities, recreational activities

## Fal and Helford SAC<sup>xxvi</sup>

### Introduction

This site is a ria (drowned river valley) system that supports a wide range of communities representative of marine inlets and shallow bays. The rias of the Fal and Helford have only a low freshwater input and as a result the area contains a range of fully marine habitats from extremely sheltered in the estuarine inlets to the wave-exposed, tide-swept rocky shores of the open coast. There is a diverse algal flora and a number of warm-water species are present. It supports extensive and rich sediment communities, as well as rocky shores and subtidal rock and boulder communities. The site also contains a large, dispersed population of shore dock (*Rumex rupestris*).

### Conservation Objectives <sup>xxvii</sup>

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

- The extent and distribution of qualifying natural habitats and habitats of qualifying species
- The structure and function (including typical species) of qualifying natural habitats
- The structure and function of the habitats of qualifying species
- The supporting processes on which qualifying natural habitats and habitats of qualifying species rely
- The populations of qualifying species, and,
- The distribution of qualifying species within the site.

### Qualifying Features

Annex I habitats that are a primary reason for selection of this site:

- Sandbanks which are slightly covered by sea water all the time
- Mudflats and sandflats not covered by seawater at low tide
- Large shallow inlets and bays

- Atlantic salt meadows (*Glauco-Puccinellietalia maritimae*)

Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site:

- Estuaries
- Reefs

Annex II species that are a primary reason for selection of this site:

- Shore dock *Rumex rupestris*

## Threats and pressures

- Pollution to groundwater (point sources and diffuse sources)
- Invasive non-native species
- Outdoor sports and leisure activities, recreational activities
- Other human intrusions and disturbances
- Shipping lanes, ports, marine constructions

## Godrevy Head to St Agnes SAC<sup>xxviii</sup>

### Introduction

The dry heathland in this site represents typical examples of wind-pruned, 'waved' western gorse – bristle bent (*Ulex gallii* – *Agrostis curtisii*) and heather (*Calluna vulgaris*) – western gorse heaths, with some maritime features. Several noteworthy species occur, including bristle bent, red-flowered kidney vetch *Anthyllis vulneraria* var. *coccinea*, Portland spurge (*Euphorbia portlandica*) and hairy greenweed (*Genista pilosa*). Scattered areas of wet heath occur, including stands of Dorset heath *Erica ciliaris* along the Chapel Porth valley. At this site the species occurs on drier substrates than in Dorset. The site also supports early gentian *Gentianella anglica*, occurring here on a non-calcareous substrate in the extreme west of its range.

## Conservation Objectives<sup>xxix</sup>

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

- The extent and distribution of qualifying natural habitats and habitats of qualifying species
- The structure and function (including typical species) of qualifying natural habitats
- The structure and function of the habitats of qualifying species
- The supporting processes on which qualifying natural habitats and habitats of qualifying species rely
- The populations of qualifying species, and,
- The distribution of qualifying species within the site.

## Qualifying Features

Annex I habitats that are a primary reason for selection of this site:

- Temperate Atlantic wet heaths with *Erica ciliaris* and *Erica tetralix*
- European dry heaths

Annex II species that are a primary reason for selection of this site:

- Early gentian *Gentianella anglica*

## Threats and pressures

- Modification of cultivation practices
- Air pollution, air-borne pollutants

## Penhale Dunes SAC<sup>xxx</sup>

### Introduction

Penhale Dunes is an extensive and exposed calcareous dune system where active geomorphological and successional dune processes occur. The dunes are composed of windblown calcareous shell sand and soils are highly calcareous with little organic content.

### Conservation Objectives<sup>xxxi</sup>

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

- The extent and distribution of qualifying natural habitats and habitats of qualifying species
- The structure and function (including typical species) of qualifying natural habitats
- The structure and function of the habitats of qualifying species
- The supporting processes on which qualifying natural habitats and habitats of qualifying species rely
- The populations of qualifying species, and,
- The distribution of qualifying species within the site.

### Qualifying Features<sup>xxxii</sup>

Annex I habitats that are a primary reason for selection of this site:

- "Fixed coastal dunes with herbaceous vegetation (""grey dunes"")"
- Humid dune slacks

Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site:

- "Shifting dunes along the shoreline with *Ammophila arenaria* (""white dunes"")"
- Dunes with *Salix repens* ssp. *argentea* (*Salicion arenariae*)

Annex II species that are a primary reason for selection of this site:

- Petalwort (*Petalophyllum ralfsii*)

- Shore dock (*Rumex rupestris*)
- Early gentian (*Gentianella anglica*)

## **Threats and pressures**

- Modification of cultivation practices
- Human induced changes in hydraulic conditions
- Invasive non-native species
- Outdoor sports and leisure activities, recreational activities

# Appendix B Policy Screening

**Table 4. Screening for Likely Significant Effects (LSEs) of the Redruth Neighbourhood Plan Revision.**

Where the ‘HRA Implications’ column is shaded green, LSEs on European sites have been excluded. For policies that are shaded orange, LSEs could not be excluded and these are taken forward to Appropriate Assessment. Policies that are shaded in grey have been updated following public consultation.

Policy	Description	HRA Implications
<b>Climate Change</b>		
Policy CC1: Supporting Cornwall Climate Change DPD	Objective: Future development in Redruth should recognise climate change issues and contribute to solutions that work for all. Policy Direction: Redruth Neighbourhood Development Plan supports the policies and guidance set out in Cornwall Council Climate Change DPD and is not setting any separate climate change policies.	No HRA Implications  This policy relates to managing climate change does not specifically allocate sites for development.  There are no linking impact pathways to European sites. The policy is screened out from Appropriate Assessment.
<b>Design Code</b>		
Policy DC1: Supporting Existing Design Code for Redruth	Existing Cornwall Council Design Code guidance for Redruth is felt to be appropriate for the Parish of Redruth and should be supported and used in the design process. Existing Cornwall Council Design Guidance which applies to Redruth includes: <ul style="list-style-type: none"> <li>• The Cornwall Design Guide,</li> <li>• The Streetscape Design Guide,</li> <li>• Historical Character Design Guidance is given in the Redruth Cornwall Industrial Settlements Initiative (CISI),</li> <li>• Redruth Cornwall and Scilly Urban Survey (CSUS),</li> <li>• WHS Management Plans, (2013-2018) &amp; (2020 – 2025)</li> <li>• Redruth Town Centre Conservation Area Management Plan</li> <li>• Plain-an-Gwarry Conservation Management Plan.</li> </ul>	No HRA Implications  This is a development management policy that sets out key development criteria to ensure future development in Redruth Parish is appropriate to Redruth and sustainability issues and does not specifically allocate sites for development.  There are no linking impact pathways to European sites. The policy is screened out from Appropriate Assessment.

Policy	Description	HRA Implications
<p>Policy DC2: Supporting development of a Redruth Shopfront Design Code</p>	<p>The only new separate design code document requirement identified during this NDP development process is a Redruth Shopfront Design Guide. This Redruth Shopfront Design guide is in development.</p> <p>The Draft Redruth Shopfront Guide provides a specific guide and sets out the policy framework. Key Shopfront design principles are:</p> <ul style="list-style-type: none"> <li>• Design: should be contextual and respond to the existing architecture and proportions of the building and those around it</li> <li>• Modern shopfronts: should be of outstanding and innovative design and not detract from the character and appearance of the rest of the building or the wider Conservation Area</li> <li>• Colour: Traditionally shopfronts were a range of colours but discretion used to avoid overly garish colours</li> <li>• Materials: Traditional materials such as wood, stone &amp; tile preferred to fit well with existing buildings and backlit, Perspex signs are not appropriate</li> <li>• Roller shutters : should be internal to allow shop displays and shopfronts to be visible at night</li> <li>• Awnings: Traditional awnings and sun blinds with integral advertising are encouraged</li> <li>• Signwriting : Traditional signwriting &amp; typography would be appropriate &amp; encouraged.</li> </ul>	<p>No HRA Implications</p> <p>This is a development management policy that sets out key development criteria in relation to the appearance of shop fronts and does not allocate sites for development.</p> <p>There are no linking impact pathways to European sites. The policy is screened out from Appropriate Assessment.</p>
<p>Historic Environment and Heritage Assets</p>		
<p>Policy H1: Supporting Redruth's World Heritage Site Status</p>	<p>1. Development proposals within the World Heritage Site [shown on Map 5] will be supported where they appropriately demonstrate by reference to the appropriate current guidance and policy documents including the adopted WHS Management Plan that:</p> <ol style="list-style-type: none"> <li>a. they reflect the significance of the affected heritage assets and their settings; and</li> <li>b. the proposal is appropriate in terms of size, height, density, design, layout, landscaping and scale; and</li> <li>c. the proposal adequately protects, conserves and enhances the inscribed Outstanding Universal Value through the appropriate assessment of impacts via a suitably detailed heritage assessment carried out in accordance with a recognised methodology such as those set out within both the</li> </ol>	<p>No HRA Implications</p> <p>This is a development management policy that sets out key development criteria in relation to protecting the world heritage site town status and does not specifically allocate sites for development.</p> <p>There are no linking impact pathways to European sites. The policy is screened out from Appropriate Assessment.</p>

Policy	Description	HRA Implications
	<p>adopted WHS Supplementary Planning Document (2017) and the ICOMOS (International Council on Monuments and Sites) Guidance on Heritage Impact Assessments for Cultural World Heritage Properties (2011).</p> <p>2. New development or redevelopment that is likely to lead to substantial harm to or total loss of significance of an undesignated WHS heritage asset will only be supported if it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:</p> <ul style="list-style-type: none"> <li>a) the nature of the heritage asset prevents all reasonable uses of the site; and</li> <li>b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and</li> <li>c) conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and</li> <li>d) the harm or loss is outweighed by the benefit of bringing the site back into use.</li> </ul> <p>3. Proposals for development or redevelopment that are within the setting of World Heritage assets which enhance or highlight the significance of the asset will be supported in principle.</p> <p>4. Where there is existing public access/views of WHS assets this should be preserved and where appropriate enhanced. &amp; encouraged.</p>	
<p>Policy H2: Development &amp; Heritage</p>	<p>1. New development proposals will be supported, as appropriate to their nature and location, where:</p> <ul style="list-style-type: none"> <li>a) it is demonstrated that their format, scale, massing, density, articulation and use of materials and other external finishes, and orientation and location within the site, is drawn from and influenced by the distinctive historic architectural, design and cultural traditions established in the surrounding character area.</li> <li>b) if it involves or would have an impact on Designated or Non-Designated heritage assets, it complies with Cornwall Local Plan Policy 24 and national policy and guidance and seeks to preserve the building or its setting or any features of special architectural or historic interest which it possesses. [Such proposals must be accompanied by a heritage impact assessment which demonstrates that any harmful impact of the development on the</li> </ul>	<p>No HRA Implications</p> <p>This is a development management policy that sets out key development criteria in relation to the protection of the historic environment and heritage assets and does not specifically allocate sites for development.</p> <p>There are no linking impact pathways to European sites. The policy is screened out from Appropriate Assessment.</p>

Policy	Description	HRA Implications
	<p>significance of the asset and its contribution to the historic character of its setting is adequately mitigated or that an enhancement results].</p> <p>c) In view of potential for prehistoric and mediaeval sub-surface evidence of sites in the Parish, a proportionate archaeological and heritage assessment is accepted and any subsequent archaeological investigation and heritage impact mitigations are agreed. For mitigation consideration should be given to the provision of material/resources to Kresen Kernow (County Records Office).</p>	
<p>Policy H3: Established historic pathways &amp; opeways</p>	<p>Development will only be supported where it respects and/or contributes to the established historic pathways, linking the town and rural sections of the parish &amp; the 8 opeways in Redruth Town Centre.</p>	<p>No HRA Implications</p> <p>This is a development management policy that sets out key development criteria in relation to historic and established pathways linking townscape and rural landscapes and does not specifically allocate sites for development.</p> <p>There are no linking impact pathways to European sites. The policy is screened out from Appropriate Assessment.</p>
<p>Policy H4: Linking Mining assets to the Town Centre</p>	<p>Connecting Redruth Town Centre to the surrounding existing mineral tramways routes (e.g. Great Flat Lode, Coast to Coast Trail &amp; Tolgus Trail) would improve the tourism offer and make the trails more accessible to residents.</p>	<p>HRA Implications</p> <p>This policy supports the development of trails and pathways.</p> <p>Although the policy does not provide a specific quantum of development, it identifies a geographic location where such development would occur. The following impact pathways are present in combination:</p> <ul style="list-style-type: none"> <li>• Recreation</li> </ul>

Policy	Description	HRA Implications
The impacts of this policy are discussed in the main body of the report.		
Housing		
Policy HS1: The Development Boundary	<p>This Neighbourhood Plan will set the development boundary for Redruth Parish as shown in Map 7. The development boundary supports a brownfield-first approach to new development (wherever practicable), to safeguard areas of the best and most versatile agricultural land.</p> <p>North Country will remain outside the development boundary in this Neighbourhood Plan. Connection of the housing development located there to the town centre and other destinations in town should be considered.</p> <p>Outside the Development Boundary development will not be supported unless it is in accordance with CLP Policy 7, 9, or 21 or is small scale infill within established hamlets and small groups of dwellings that complies with NDP Policy H6.</p>	<p>No HRA Implications</p> <p>This is a development management policy that does not specifically allocate sites for development.</p> <p>There are no linking impact pathways to European sites. The policy is screened out from Appropriate Assessment.</p>
Policy HS2: Redruth supports HAPPI principle development for Redruth. HAPPI is 'Housing our Ageing Population Panel for Innovation' which has been working on proposals since 2009.	<p>The HAPPI principles are based on 10 key design criteria. Many are recognisable from good design generally - good light, ventilation, room to move around and good storage - but they have particular relevance to the spectrum of older persons' housing which needs to both offer an attractive alternative to the family home, and be able to adapt over time to meet changing needs.</p>	<p>HRA Implications</p> <p>This policy supports the development of mixed-use dwellings and ground-floor retail units to promote the improvement of the town centre.</p> <p>Although the policy does not provide a specific quantum of development, it identifies a geographic location where such development would occur. The following impact pathways are present in combination:</p> <ul style="list-style-type: none"> <li>• Recreational Pressure</li> </ul> <p>The impacts of this policy are discussed in the main body of the report.</p>
Policy HS3: Affordable Housing Led Schemes	<p>Housing schemes which meet an identified local affordable housing need will be supported where they are in accordance with Cornwall Council's Local Plan and Affordable Housing Policies and guidance.</p>	HRA Implications

Policy	Description	HRA Implications
	<p>All new affordable homes should take steps to comply with the guidance set out within Cornwall Council’s Design Guide.</p> <p>Affordable housing may differ from open market provision where it is demonstrated to meet an identified local need.</p>	<p>This policy supports the development of housing where it meets an identified local affordable housing need.</p> <p>Although the policy does not provide a specific quantum of development, the following impact pathways are present:</p> <ul style="list-style-type: none"> <li>• Recreational Pressure</li> </ul> <p>The impacts of this policy are discussed in the main body of the report.</p>
<p>Policy HS4: Mixed Development Schemes</p>	<p>The development of mixed tenure schemes (affordable and market housing) will be supported and encouraged where:</p> <ol style="list-style-type: none"> <li>i) it can demonstrate it meets a local need for housing; and</li> <li>ii) Where mixed tenure schemes are delivered in full or in part on brownfield sites, a reduced proportion of affordable housing provision will be supported where justified by evidence of prohibitive abnormal costs (for example, decontamination works).</li> <li>iii) Cornwall Council will secure the first and future occupation of the affordable homes to those with a housing need and local connection to the settlement or parish.</li> </ol>	<p>HRA Implications</p> <p>This policy supports the development of mixed tenure schemes where it meets an identified local housing need.</p> <p>Although the policy does not provide a specific quantum of development, the following impact pathways are present:</p> <ul style="list-style-type: none"> <li>• Recreational Pressure</li> </ul> <p>The impacts of this policy are discussed in the main body of the report.</p>
<p>Policy HS5: Conversion of Residential Garages.</p>	<p>Conversion of residential Garages where planning permission is required for garage conversion to habitable rooms, proposals will only be supported where they include appropriate replacement on-site parking.</p>	<p>HRA Implications</p> <p>This policy supports the conversion of garages to habitable rooms.</p> <p>Although the policy does not provide a specific quantum of development, the following impact pathways are present:</p>

Policy	Description	HRA Implications
Town Centre	<p>Policy T1: Town Centre Vision for Redruth</p> <p>The Redruth Town and World Heritage Site Spatial Vision and Investment Plan 2022 produced by Lavingne Lonsdale through the HSHAZ and town vitality should be supported.</p>	<ul style="list-style-type: none"> <li>Recreational Pressure</li> </ul> <p>The impacts of this policy are discussed in the main body of the report.</p>
<p>Policy T2: Primary Retail Frontage</p>	<p>We propose the Primary Retail Frontage area should allow other commercial uses including leisure and service uses, which require customers to visit in person. Evening uses should also be considered for permission.</p>	<p>No HRA Implications</p> <p>This is a development management policy that sets out key development criteria in relation to protecting heritage and does not specifically allocate sites for development.</p> <p>There are no linking impact pathways to European sites. The policy is screened out from Appropriate Assessment.</p>
<p>Policy T3: Upper Floors and the rear of Town Centre buildings</p> <p>Upper floors and the rear of Town Centre buildings should be encouraged to develop into appropriate housing where feasible.</p>		<p>No HRA Implications</p> <p>This is a development management policy that sets out key development criteria in relation to encouraging customers to visit retail units in person and does not specifically allocate sites for development.</p> <p>There are no linking impact pathways to European sites. The policy is screened out from Appropriate Assessment.</p>
<p>Policy T3: Upper Floors and the rear of Town Centre buildings</p> <p>Upper floors and the rear of Town Centre buildings should be encouraged to develop into appropriate housing where feasible.</p>		<p>HRA Implications</p> <p>This policy supports the development of housing within the upper floors and the rear of Town Centre buildings.</p>

Policy	Description	HRA Implications
		<p>Although the policy does not provide a specific quantum of development, the following impact pathways are present:</p> <ul style="list-style-type: none"> <li>Recreational Pressure</li> </ul> <p>The impacts of this policy are discussed in the main body of the report.</p>
<p>Policy T4: Fairmeadow Retail allocation review</p>	<p>Fairmeadow car park retail site allocation in the Cornwall Local Plan should be broadened to permit other development use. A proportion of the site should be retained as a car park and the rest of the site development permission broadened to permit other appropriate town centre uses.</p>	<p>HRA Implications</p> <p>This policy allocates land for development. The following impact pathways are present:</p> <ul style="list-style-type: none"> <li>Recreational Pressure</li> </ul> <p>The impacts of this policy are discussed in the main body of the report.</p>
<p>Policy T5: Redruth Brewery Site development</p>	<p>Support the re-development of the remainder of the Redruth Brewery site re- to provide a re-development which is appropriate &amp; beneficial for Redruth.</p>	<p>HRA Implications</p> <p>This policy supports the redevelopment of the Redruth Brewery site for an unspecified purpose that could include housing.</p> <p>Although the policy does not provide a specific quantum of development, the following impact pathways are present:</p> <ul style="list-style-type: none"> <li>Recreational Pressure</li> </ul> <p>The impacts of this policy are discussed in the main body of the report.</p>

Redruth Employment Sites (outside the Town Centre Boundary)

Policy	Description	HRA Implications
Policy BE1: Safeguarding and Enhancement of Employment Land & Policy	<ol style="list-style-type: none"> <li>1. The existing employment sites E13 Parc Erissey &amp; E14 Krowji are safeguarded in accordance with CLP Policy 5.</li> <li>2. Sites will only be released if:                             <ol style="list-style-type: none"> <li>a. It can be demonstrated that the use of the premises for the existing or another commercial usage is no longer viable.</li> <li>b. The proposed alternative use would provide equal or greater benefits for the local economy and community than its current use.</li> </ol> </li> <li>3. Where any of these sites is no longer required, the mechanism for release in Policy 5 of the Cornwall Local Plan will apply.</li> <li>4. The redevelopment and/or enhancement of employment uses on existing sites to provide upgraded premises and improved environment will be supported subject to there being no significant detrimental impact on the amenities of adjoining residential areas. Proposals should seek to improve pedestrian/cycle links to adjoining residential areas, pedestrian links to public transport routes, and enhance the usability and safety of existing routes.</li> </ol>	<p>No HRA Implications</p> <p>This is policy aims to protect employment sites and does not specifically allocate sites for development.</p> <p>There are no linking impact pathways to European sites. The policy is screened out from Appropriate Assessment.</p>
BE2: New Business Development	<ol style="list-style-type: none"> <li>1. Proposals for new and expanding businesses which align with the aims of the Cornwall Strategic Economic Plan, Climate Change DPD or deliver attractive and adaptable spaces suitable for a wide range of modern manufacturing, innovation and evolutionary processes, will be supported subject to the following criteria:                             <ol style="list-style-type: none"> <li>a) It uses Previously Developed Land in preference to greenfield land;</li> <li>b) The proposed use will not have a materially adverse impact on the environment and the amenity of adjoining residential properties in terms of, noise, effluent or fumes it would emit, and the traffic it would generate;</li> <li>c) It includes where possible measures to improve access on foot, cycling or public transport;</li> <li>d) If in a rural area:                                     <ol style="list-style-type: none"> <li>a. It is located within or adjacent to existing groups of buildings or use previously developed land.</li> <li>b. The scale, form, bulk and general design is appropriate to its location.</li> </ol> </li> </ol> </li> </ol>	<p>HRA Implications</p> <p>This policy supports the development of new and expanding businesses.</p> <p>Although the policy does not provide a specific quantum of development, the following impact pathways are present:</p> <ul style="list-style-type: none"> <li>• Recreational Pressure</li> </ul> <p>The impacts of this policy are discussed in the main body of the report.</p>

Policy	Description	HRA Implications
	<ul style="list-style-type: none"> <li>c. It does not create road hazards that are considered unacceptable by the Highway Authority;</li> <li>d. Where appropriate and feasible, it supports opportunities to make the location more sustainable by improving the scope for access on foot, by cycling or by public transport.</li> <li>e) If a conversion:               <ul style="list-style-type: none"> <li>a. The building is capable of change or conversion without the need for major extension or rebuilding;</li> <li>b. If extension is required the scale, design and use of materials retain the existing character of the building and relate to its surroundings; and</li> <li>c. There is no loss of residential dwellings.</li> <li>d. If a conversion or change of use of a listed building, the proposal is in accordance with CLP strategic policy 24 [Historic Environment] will apply.</li> </ul> </li> </ul>	
Transport Policies		
<p>Policy TR1: Improving cycling and walking routes should be the transport priority for the rest of the plan period.</p>	<p>Improving cycling and walking routes should be the transport priority for the rest of the plan period for Redruth, rather than road improvements. Transport improvements in Redruth Parish should prioritise improving walking and cycling infrastructure so that it is easier to travel to destinations safely either on foot or by cycle, rather than investing in roads, other than for maintenance or safety improvements.</p> <p>Where a disused railway line passes through a development site and has the potential for rail reuse or to form part of Cornwall's walking and cycling green network (or does so at present), developers will be required to incorporate/deliver the rail/pedestrian/cycle route as part of their application or provide an acceptable alternative that delivers at least equivalent transport and green network benefits.</p>	<p>No HRA Implications</p> <p>This is policy relates to transport infrastructure but does not specifically allocate sites for development.</p> <p>There are no linking impact pathways to European sites. The policy is screened out from Appropriate Assessment.</p>
<p>Policy TR2: Tolgus Trail Phase 2</p>	<p>Extending the Tolgus Trail route to Redruth Town Centre would encourage and enable both residents and tourists to travel to and from Portreath without a car. This route has a number of employment sites along it &amp; connects to Redruth School.</p>	<p>No HRA Implications</p> <p>This is policy relates to transport infrastructure but does not specifically allocate sites for residential development.</p>

Policy	Description	HRA Implications
Policy TR3: To make adequate provision for public vehicle charging points.	<p>Electric vehicles are increasing in number and take time to charge, so locating charging points in locations where drivers can spend some time at their convenience is important.</p> <p>Providing more public charging locations is suitable locations should be encouraged.</p>	<p>There are no linking impact pathways to European sites. The policy is screened out from Appropriate Assessment.</p> <p>No HRA Implications</p> <p>This is policy relates to electric vehicle charging points and does not specifically allocate sites for development.</p> <p>There are no linking impact pathways to European sites. The policy is screened out from Appropriate Assessment.</p>
Green Infrastructure Policies		
Policy GI1: Redruth Neighbourhood Plan supports the CPIR Green Infrastructure Strategy proposals set for Redruth Parish	<p>Redruth Neighbourhood Plan supports the CPIR Green Infrastructure Strategy proposals set for Redruth Parish as follows.</p> <ul style="list-style-type: none"> <li>• Supporting the Vision, Principles and local set ambitions and priorities outlined in the document.</li> <li>• Supporting improved pedestrian and cycle routes to connect key destinations and offer a viable alternative to using the car.</li> <li>• Parks and Amenity sites prioritised for short term improvement are Victoria Park, East End access improvements &amp; Fairfield Park. Improving Raymond Road Playing Field is a medium-term priority.</li> <li>• Public Access Sports and Leisure sites prioritised for short term improvement are Clijah Croft AWP (Phase 1) &amp; Strawberry Fields. Improving Clijah Croft AWP (Phase 2) is a medium-term priority. Longer term are Redruth Rugby Club, Mount Ambrose Cricket Club &amp; Redruth Cricket Club.</li> <li>• Play - Local development contributions allocated for play should be used to upgrade the nearest parks that require improvement in accordance with the current priority list. Where possible, these funds could also be used to improve accessibility to these spaces by improving walking or cycling links. Short term priorities are Wheal Harmony, Treskerby (create new) and Roseland Gardens.</li> <li>• Youth Provision for short term improvement was the creation of a Skatepark in East End Playing Fields. This was delivered in</li> </ul>	<p>No HRA Implications</p> <p>This is policy relates to protecting green infrastructure and does not specifically allocate sites for development.</p> <p>There are no linking impact pathways to European sites. The policy is screened out from Appropriate Assessment.</p>

Policy	Description	HRA Implications
	<p>autumn of 2021. Gwealan Tops Adventure Playground (GTAP) should also be supported.</p> <ul style="list-style-type: none"> <li>Allotments, community orchards or gardens for medium term is the creation of new allotments in St Ambrose. Redruth doesn't currently have any community orchards or gardens. These should be encouraged in any appropriate locations.</li> <li>Cemeteries and Churchyards for short term improvement is St Day Cemetery. Natural Green spaces for short term improvement are The Paddock and Clijah Croft for tree planting.</li> <li>Other priorities are increasing tree planting, increasing biodiversity, properly planning green infrastructure in new development and better utilising small incidental spaces to meet the priorities.</li> </ul>	
<p>Policy GI2: Safeguard and enhance green spaces within the town development boundary</p>	<p>A list of green spaces within the town development boundary is shown in table 12. Infill development will only be permitted where there is no loss to the character and amenity of these sites and surrounding area, where the scale and mass of development respects the character of the area &amp; surrounding properties, and where significant features of the historic and natural environment are preserved or, in exceptional circumstances, restored.</p>	<p>No HRA Implications</p> <p>This policy relates to protecting and enhancing green spaces which would not have a negative impact on European sites.</p>
<p>Health</p>		
<p>Policy HE1: Ensure the future Health provision is appropriate for the growing population and changing needs.</p>	<p>Support Leatside Health Centre with their aspirations to acquire operational space in the NHS owned Health Centre on Forthnoweth, in order to be able to provide appropriate GP services for the growing Redruth population.</p>	<p>No HRA Implications</p> <p>This policy relates to provision of health services and does not allocate any sites for development.</p> <p>There are no linking impact pathways to European sites. The policy is screened out from Appropriate Assessment.</p>
<p>Policy HE2: Provide adequate dentist provision.</p>	<p>Support proposal for increased dentist provision in Redruth, particularly NHS dentist provision.</p>	<p>No HRA Implications</p> <p>This policy relates to provision of dentists and does not specifically allocate sites for development.</p>

**Policy**

**Description**

**HRA Implications**

There are no linking impact pathways to European sites. The policy is screened out from Appropriate Assessment.

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- <sup>i</sup> Case C-323/17
- <sup>ii</sup> DLUHC (2006) Planning for the Protection of European Sites, Consultation Paper
- <sup>iii</sup> No Adastral New Town Ltd (NANT) v Suffolk Coastal District Council Court of Appeal, 17<sup>th</sup> February 2015
- <sup>iv</sup> High Court case of R (Devon Wildlife Trust) v Teignbridge District Council, 28 July 2015
- <sup>v</sup> DLUHC (2006) Planning for the Protection of European Sites, Consultation Paper
- <sup>vi</sup> <https://www.gov.uk/guidance/appropriate-assessment>
- <sup>vii</sup> As identified in the Site Improvement Plans or RAMS for European sites.
- <sup>viii</sup> <https://www.cornwall.gov.uk/media/wmvnoxzz/european-sites-mitigation-spd-july-2021-marine-and-terrestrial-sites.pdf> [Accessed 09/11/2023]
- <sup>ix</sup> Waddenzee case (Case C-127/02, [2004] ECR-I 7405)
- <sup>x</sup> Cornwall Site Allocations Development Plan Document. Adopted November 2019. Available at: <https://www.cornwall.gov.uk/media/p0ucvkw0/cornwall-site-allocations-development-plan-document.pdf> [Accessed on the 09/10/2019].
- <sup>xi</sup> The RTP1 report 'Planning for an Ageing Population'(2004) which states that 'From being a marginalised group in society, the elderly are now a force to be reckoned with and increasingly seen as a market to be wooed by the leisure and tourist industries. There are more of them and generally they have more time and more money.' It also states that 'Participation in most physical activities shows a significant decline after the age of 50. The exceptions to this are walking, golf, bowls and sailing, where participation rates hold up well into the 70s'.
- <sup>xii</sup> Tuite, C. H., Owen, M. & Paynter, D. 1983. Interaction between wildfowl and recreation at Llangorse Lake and Talybont Reservoir, South Wales. *Wildfowl* 34: 48-63
- <sup>xiii</sup> Underhill, M.C. et al. 1993. Use of Waterbodies in South West London by Waterfowl. An Investigation of the Factors Affecting Distribution, Abundance and Community Structure. Report to Thames Water Utilities Ltd. and English Nature. Wetlands Advisory Service, Slimbridge
- <sup>xiv</sup> Riley, J. 2003. Review of Recreational Disturbance Research on Selected Wildlife in Scotland. Scottish Natural Heritage.
- <sup>xv</sup> Reijnen, R. et al. 1995. The effects of car traffic on breeding bird populations in woodland. III. Reduction of density in relation to the proximity of main roads. *Journal of Applied Ecology* 32: 187-202
- <sup>xvi</sup> Wilson, J.P. & J.P. Seney. 1994. Erosional impact of hikers, horses, motorcycles and off road bicycles on mountain trails in Montana. *Mountain Research and Development* 14:77-88
- <sup>xvii</sup> Cole, D.N. 1995a. Experimental trampling of vegetation. I. Relationship between trampling intensity and vegetation response. *Journal of Applied Ecology* 32: 203-214
- Cole, D.N. 1995b. Experimental trampling of vegetation. II. Predictors of resistance and resilience. *Journal of Applied Ecology* 32: 215-224
- <sup>xviii</sup> Cole, D.N. 1995c. Recreational trampling experiments: effects of trampler weight and shoe type. Research Note INT-RN-425. U.S. Forest Service, Intermountain Research Station, Utah.
- <sup>xix</sup> Cole, D.N., Spildie, D.R. 1998. Hiker, horse and llama trampling effects on native vegetation in Montana, USA. *Journal of Environmental Management* 53: 61-71
- <sup>xx</sup> <https://www.cornwall.gov.uk/media/wmvnoxzz/european-sites-mitigation-spd-july-2021-marine-and-terrestrial-sites.pdf> [Accessed 09/11/2023]
- <sup>xxi</sup> <https://www.cornwall.gov.uk/media/wmvnoxzz/european-sites-mitigation-spd-july-2021-marine-and-terrestrial-sites.pdf> [Accessed 09/11/2023]
- <sup>xxii</sup> <https://www.cornwall.gov.uk/media/wmvnoxzz/european-sites-mitigation-spd-july-2021-marine-and-terrestrial-sites.pdf> [Accessed 09/11/2023]
- <sup>xxiii</sup> <https://jncc.gov.uk/jncc-assets/SAC-N2K/UK0030396.pdf> [Accessed 09/11/2023]
- <sup>xxiv</sup> <https://sac.jncc.gov.uk/site/UK0012795> [Accessed 09/11/2023]
- <sup>xxv</sup> <https://publications.naturalengland.org.uk/publication/5193717442936832> [Accessed 09/11/2023]
- <sup>xxvi</sup> <https://sac.jncc.gov.uk/site/UK0013112> [Accessed 09/11/2023]
- <sup>xxvii</sup> <https://publications.naturalengland.org.uk/publication/5176566698999808> [Accessed 09/11/2023]
- <sup>xxviii</sup> <https://sac.jncc.gov.uk/site/UK0012549> [Accessed 09/11/2023]
- <sup>xxix</sup> <https://publications.naturalengland.org.uk/publication/6489762512764928> [Accessed 09/11/2023]
- <sup>xxx</sup> <https://sac.jncc.gov.uk/site/UK0012559> [Accessed 09/11/2023]
- <sup>xxxi</sup> <https://publications.naturalengland.org.uk/publication/4991159772381184> [Accessed 09/11/2023]
- <sup>xxxii</sup> <https://sac.jncc.gov.uk/site/UK0012559> [Accessed 09/11/2023]