

Habitat Regulations Assessment: Marton Moss Neighbourhood Plan

Marton Moss Neighbourhood Forum

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Quality information

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1. Introduction

Scope of project

- 1.1 AECOM was appointed by the Marton Moss Neighbourhood Forum to undertake a Habitats Regulations Assessment (HRA) for the Marton Moss draft Neighbourhood Plan (MMNP) 2020-2030. This is to inform the Forum and Blackpool Council of the potential for any significant adverse effects of Neighbourhood Plan (NP) development on European Sites and how they are being, or should be, addressed in the draft NP.
- 1.2 The MMNP is being created by the Marton Moss Neighbourhood Forum, which was formed in 2019 with the purpose of producing a Neighbourhood Plan for Marton Moss, in the absence of a parish council. Blackpool Council is in the process of preparing the Part Two Local Plan which will contain some policies of general application across the whole of Blackpool, but it will not include any site-specific proposals for the Marton Moss Neighbourhood Area.
- 1.3 The housing requirement figure is a minimum of 28 dwellings over the 10-year plan period. This Plan covers the Neighbourhood of Marton Moss which covers an area of approximately 2km² and lies in the southern extent of Blackpool north-east of Blackpool airport.
- 1.4 The objective of this HRA is to identify if any particular site allocation proposed by in the MMNP have the potential to cause an adverse effect on the integrity of European designated sites (Special Areas of Conservation, SACs, Special Protection Areas, SPAs, and Ramsar sites designated under the Ramsar convention), either in isolation or in combination with other plans and projects, and to determine whether site-specific or policy mitigation measures are required.
- 1.5 An HRA screening report completed by Arcadis in March 2021 has, after review by Natural England, identified two impact pathways that require further assessment and appropriate mitigation.

Legislation

- 1.6 The need for HRA is set out within the Conservation of Habitats & Species Regulations 2017 (as amended) and concerns the protection of European sites. European sites can be 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.
- 1.7 The HRA process applies the precautionary principle to protected areas. 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. 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.

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]."

Box 1: The legislative basis for HRA

- 1.8 It is therefore important to note that this report has two purposes:
 - To assist the Qualifying Body (Marton Moss Neighbourhood Forum) 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 (Blackpool Council) 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').
- 1.9 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.
- 1.10 Over the years, 'Habitats Regulations Assessment' (HRA) has come into wide currency to describe the overall process set out in the Habitats Regulations, from screening through to identification of IROPI. This has arisen in order to distinguish the overall process from the individual stage of "Appropriate Assessment". Throughout this Report the term HRA is used for the overall process and restricts the use of Appropriate Assessment to the specific stage of that name.

2. Methodology

Introduction

- 2.1 Figure 1 below outlines the stages of HRA according to current Ministry of Housing, Communities and Local Government 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 significant adverse effects remain.

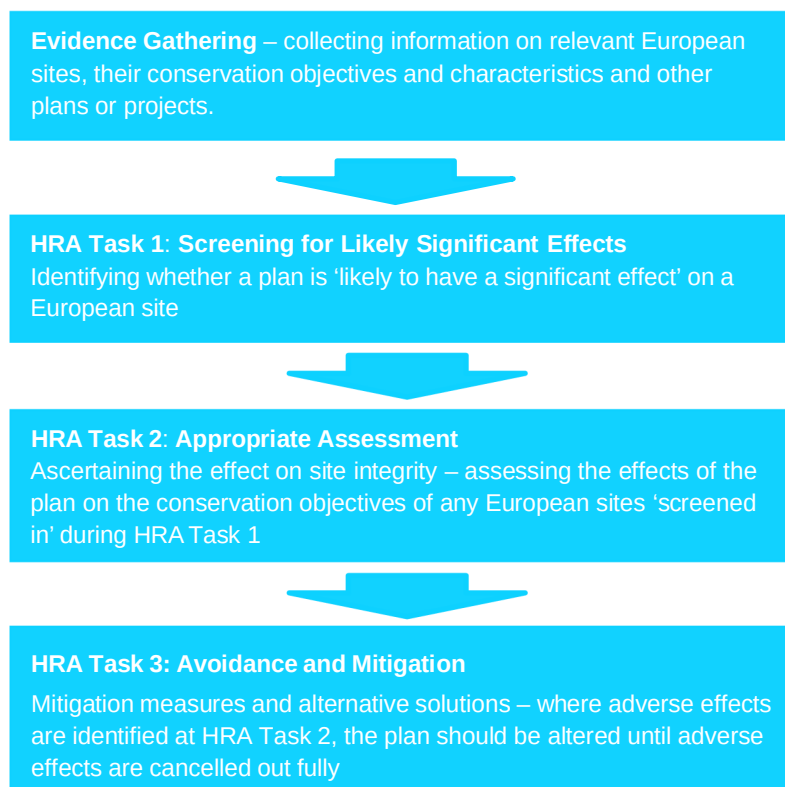


Figure 1: Four Stage Approach to Habitats Regulations Assessment. Source GOV.UK, 2019.

HRA Task 1 – Likely Significant Effects (LSE)

- 2.2 Following evidence gathering, the first stage of any Habitats Regulations Assessment is a Likely Significant Effect (LSE) test - essentially a risk assessment to decide whether the full subsequent stage known as Appropriate Assessment is required. The essential question is:

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

- 2.3 The objective is to 'screen out' those plans and projects that can, without any detailed appraisal, be said to be unlikely to result in significant adverse effects upon European sites, usually because there is no mechanism for an adverse interaction with European sites. This stage is undertaken in Chapter 4 of this report.

HRA Task 2 – Appropriate Assessment (AA)

- 2.4 Where it is determined that a conclusion of 'no likely significant effect' cannot be drawn, the analysis has proceeded to the next stage of HRA known as Appropriate Assessment. Case law has clarified that 'appropriate assessment' is not a technical term. In other words, there are no particular technical analyses,

or level of technical analysis, that are classified by law as belonging to appropriate assessment rather than determination of likely significant effects.

- 2.5 During July 2019 the Ministry of Housing, Communities and Local Government published guidance for Appropriate Assessment¹. Paragraph: 001 Reference ID: 65-001-20190722m explains: *'Where the potential for likely significant effects cannot be excluded, a competent authority must make an appropriate assessment of the implications of the plan or project for that site, in view of the site's conservation objectives. The competent authority may agree to the plan or project only after having ruled out adverse effects on the integrity of the habitats site. Where an adverse effect on the site's integrity cannot be ruled out, and where there are no alternative solutions, the plan or project can only proceed if there are imperative reasons of over-riding public interest and if the necessary compensatory measures can be secured'*.
- 2.6 As this analysis follows on from the screening process, there is a clear implication that the analysis will be more detailed than undertaken at the screening stage and 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 analyses the potential for an effect in more detail, with a view to concluding whether there would be an adverse effect on integrity (in other words, disruption of the coherent structure and function of the European site(s)).
- 2.7 A decision by the European Court of Justice² concluded that measures intended to avoid or reduce the harmful effects of a proposed project on a European site may no longer be taken into account by competent authorities at the Likely Significant Effects or 'screening' stage of HRA. The UK is no longer part of the European Union. However, as a precaution, it is assumed for the purposes of this HRA that EU case law regarding Habitat Regulations Assessment will still be considered informative jurisprudence by the UK courts. That ruling has therefore been considered in producing this HRA.
- 2.8 Also, in 2018 the Holohan ruling³ was handed down by the European Court of Justice. Among other provisions paragraph 39 of the ruling states that *'As regards other habitat types or species, which are present on the site, but for which that site has not been listed, and with respect to habitat types and species located outside that site, ... typical habitats or species must be included in the appropriate assessment, if they are necessary to the conservation of the habitat types and species listed for the protected area'* [emphasis added]. This has been taken into account in the HRA process.

HRA Task 3 – Avoidance and Mitigation

- 2.9 Where necessary, measures are recommended for incorporation into the Plan in order to avoid or mitigate adverse effects on European sites. There is considerable precedent concerning the level of detail that a Neighbourhood Plan document needs to contain regarding mitigation for recreational impacts on European sites. The implication of this precedent is that it is not necessary for all measures that will be deployed to be fully developed prior to adoption of the Plan, but the Plan must provide an adequate policy framework within which these measures can be delivered.
- 2.10 In evaluating significance, AECOM has relied on professional judgement and the Local Plan HRA regarding development impacts on the European sites considered within this assessment.
- 2.11 When discussing 'mitigation' for a Neighbourhood Plan document, one is concerned primarily with the policy framework to enable the delivery of such mitigation rather than the details of the mitigation measures themselves since the Local Plan document is a high-level policy document. A Neighbourhood Plan is a lower level constituent of a Local Plan.

¹ <https://www.gov.uk/guidance/appropriate-assessment/what-are-the-implications-of-the-people-over-wind-judgment-for-habitats-regulations-assessments> [Accessed: 07/01/2020].

² People Over Wind and Sweetman v Coillte Teoranta (C-323/17)

³ Case C-461/17

Confirming Other Plans and Projects That May Act ‘In Combination’

- 2.12 It is a requirement of the Regulations that the impacts 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 site(s) in question.
- 2.13 In considering the potential for combined widespread housing development to impact on European sites the primary consideration is the impact of visitor numbers – i.e. recreational pressure and urbanisation.
- 2.14 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 may 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 or policy would otherwise be screened out because its individual contribution is inconsequential.

3. Internationally Designated Sites

- 3.1 In the case of the MMNP, it has been determined by the Arcadis HRA Screening work and Natural England's advice in response that the European sites identified in **Table 1** require consideration.
- 3.2 The locations of the below European sites in relation to the MMNP boundary and allocated sites are illustrated in **Appendix A, Figure 1A**.

Table 1 European Sites for Consideration and their Location in Relation to the Marton Moss Neighbourhood Plan

European site	Location
Ribble and Alt Estuaries Ramsar site	Located c.4.2km from the MMNP boundary
Ribble and Alt Estuaries SPA	Located c.4.2km from the MMNP boundary

Source: <https://magic.defra.gov.uk/MagicMap.aspx>

- 3.3 The other 3 sites within a 10km radius of the MMNP area have been screened out. These were: Liverpool Bay SPA (3km from western boundary), Morecambe Bay Ramsar site (7.4km from northern boundary) and Shell Flat and Lune Deep SAC (9.2km from western boundary). More details on the screening process can be found in the screening document.
- 3.4 The reason for designation, conservation objectives and environmental vulnerabilities of the screened in European sites are detailed below.

Ribble and Alt Estuaries Ramsar Site

- 3.5 Located on the coast of Lancashire, the site consists of extensive areas of sandflats and mudflats, as well as large areas of saltmarsh, particularly in the Ribble. There are also areas of coastal grazing marsh.

Reason for Designation⁴

- 3.6 The site is designated as a Ramsar for the following Criteria:
- 3.7 The site citation (JNCC, 2008(a)) provides the species and numbers of birds which form qualifying features of the Ramsar site.

Ramsar criterion 6: species/populations occurring at levels of international importance.

- Lesser black-backed gull, *Larus fuscus graellsii* - 4108 apparently occupied nests, representing an average of 2.7% of the breeding population (Seabird 2000 Census)
- Ringed plover, *Charadrius hiaticula* - 3761 individuals, representing an average of 5.1% of the population (5 year peak mean 1998/9-2002/3 - spring peak)
- Grey plover, *Pluvialis squatarola* -11021 individuals, representing an average of 4.4% of the population (5 year peak mean 1998/9-2002/3 - spring peak)
- Red knot, *Calidris canutus islandica* - individuals, representing an average of 9.4% of the population (5 year peak mean 1998/9-2002/3)
- Sanderling, *Calidris alba* - individuals, representing an average of 6% of the population (5 year peak mean 1998/9- 2002/3 - spring peak)
- Dunlin, *Calidris alpina alpina* - 38196 individuals, representing an average of 2.8% of the population (5 year peak mean 1998/9-2002/3 - spring peak)
- Black-tailed godwit, *Limosa limosa islandica* - 3323 individuals, representing an average of 9.4% of the population (5 year peak mean 1998/9-2002/3)

⁴ <https://jncc.gov.uk/jncc-assets/RIS/UK11056.pdf> [accessed 14/04/2021]

- Common redshank, *Tringa totanus tetanus* - 4465 individuals, representing an average of 1.7% of the population (5 year peak mean 1998/9-2002/3)
- Lesser black-backed gull, *Larus fuscus graellsii* - 1747 individuals, representing an average of 2.8% of the GB population (5 year peak mean 1998/9-2002/3)
- Tundra swan, *Cygnus columbianus bewickii* - 230 individuals, representing an average of 2.8% of the GB population (5 year peak mean 1998/9-2002/3)
- Whooper swan, *Cygnus Cygnus* - 211 individuals, representing an average of 1% of the population (5 year peak mean 1998/9-2002/3)
- Pink-footed goose, *Anser brachyrhynchus* - 6552 individuals, representing an average of 2.7% of the population (5 year peak mean 1998/9-2002/3)
- Common shelduck, *Tadorna tadorna* - 2944 individuals, representing an average of 3.7% of the GB
- Eurasian wigeon, *Anas Penelope* - 69841 individuals, representing an average of 4.6% of the population (5 year peak mean 1998/9-2002/3)
- Eurasian teal, *Anas crecca* - 5107 individuals, representing an average of 1.2% of the population (5 year peak mean 1998/9-2002/3)
- Northern pintail, *Anas acuta* - 1497 individuals, representing an average of 2.4% of the population (5 year peak mean 1998/9-2002/3)
- Eurasian oystercatcher, *Haematopus ostralegus ostralegus* - 18926 individuals, representing an average of 1.8% of the population (5 year peak mean 1998/9-2002/3)
- Bar-tailed godwit, *Limosa lapponica lapponica* - 13935 individuals, representing an average of 11.6% of the population (5 year peak mean 1998/9-2002/3)

Factors (Past, Present or Potential) Adversely Affecting the Site's Ecological Character

- 3.8 The Information Sheet on Ramsar Sites⁵ identifies the following pressures and threats to the Ramsar site:
- Erosion - Coastal erosion is a factor at Formby Point with an estimated loss of 4 metres per year. It is a concern because pine woodland on the sand dunes is causing coastal squeeze and therefore preventing sand dune habitats from rolling back; as such dune slack habitats for natterjack toads are declining/being lost.

Ribble and Alt Estuaries SPA

Reason for SPA Designation⁶

- 3.9 Qualifying individual species listed in Annex I of the Wild Birds Directive that are supported by the site are:
- Common Tern *Sterna hirundo* - 182 pairs representing at least 1.5% of the breeding population in Great Britain (Count, as at 1996)
 - Ruff *Philomachus pugnax* - 1 pair representing at least 9.1% of the breeding population in Great Britain (Count as at late 1980s)
 - Bar-tailed Godwit *Limosa lapponica* - 18,958 individuals representing at least 35.8% of the wintering population in Great Britain (5-year peak mean 1991/2 - 1995/6)
 - Bewick's Swan *Cygnus columbianus bewickii* - 229 individuals representing at least 3.3% of the wintering population in Great Britain (5-year peak mean 1991/2 - 1995/6)

⁵ <https://rsis.ramsar.org/RISapp/files/RISrep/GB325RIS.pdf?language=en> [accessed 14/04/2021]

⁶ <http://publications.naturalengland.org.uk/publication/4868920422957056> [accessed 14/04/2021]

- Golden Plover *Pluvialis apricaria* - 4,277 individuals representing at least 1.7% of the wintering population in Great Britain (5-year peak mean 1991/2 - 1995/6)
- Whooper Swan *Cygnus* - 159 individuals representing at least 2.9% of the wintering population in Great Britain (5-year peak mean 1991/2 - 1995/6)

3.10 This site also qualifies under **Article 4.2** of the Directive (79/409/EEC) by supporting populations of European importance of the following migratory species:

- Lesser Black-backed Gull *Larus fuscus* - 1,800 pairs representing at least 1.5% of the breeding Western Europe/Mediterranean/Western Africa population (Count, as at 1993)
- Ringed Plover *Charadrius hiaticula* - 995 individuals representing at least 2.0% of the Europe/Northern Africa - wintering population (5-year peak mean 1991/2 - 1995/6)
- Sanderling *Calidris alba* - 6,172 individuals representing at least 6.2% of the Eastern Atlantic/Western & Southern Africa - wintering population (3-year mean May 1993 - 1995)
- Black-tailed Godwit *Limosa limosa islandica* - 819 individuals representing at least 1.2% of the wintering Iceland - breeding population (5-year peak mean 1991/2 - 1995/6)
- Dunlin *Calidris alpina alpina* - 39,952 individuals representing at least 2.9% of the wintering Northern Siberia/Europe/Western Africa population (5-year peak mean 1991/2 - 1995/6)
- Grey Plover *Pluvialis squatarola* - 6,073 individuals representing at least 4.0% of the wintering Eastern Atlantic - wintering population (5-year peak mean 1991/2 - 1995/6)
- Knot *Calidris canutus* - 57,865 individuals representing at least 16.5% of the wintering Northeastern Canada/Greenland/Iceland/Northwestern Europe population (5-year peak mean 1991/2 - 1995/6)
- Oystercatcher *Haematopus ostralegus* - 16,159 individuals representing at least 1.8% of the wintering Europe& Northern/Western Africa population (5-year peak mean 1991/2 - 1995/6)
- Pink-footed Goose *Anser brachyrhynchus* - 23,860 individuals representing at least 10.6% of the wintering Eastern Greenland/Iceland/UK population (5-year peak mean 1991/2 - 1995/6)
- Pintail *Anas acuta* - 3,333 individuals representing at least 5.6% of the wintering Northwestern Europe population (5-year peak mean 1991/2 - 1995/6)
- Redshank *Tringa totanus* - 2,708 individuals representing at least 1.8% of the wintering Eastern Atlantic - wintering population (5-year peak mean 1991/2 - 1995/6)
- Sanderling *Calidris alba* - 2,859 individuals representing at least 2.9% of the wintering Eastern Atlantic/Western & Southern Africa - wintering population (5-year peak mean 1991/2 - 1995/6)
- Shelduck *Tadorna tadorna* - 4,103 individuals representing at least 1.4% of the wintering Northwestern Europe population (5-year peak mean 1991/2 - 1995/6)
- Teal *Anas crecca* - 7,641 individuals representing at least 1.9% of the wintering Northwestern Europe population (5-year peak mean 1991/2 - 1995/6)
- Wigeon *Anas penelope* - 84,699 individuals representing at least 6.8% of the wintering Western Siberia/Northwestern/Northeastern Europe population (5-year peak mean 1991/2 - 1995/6)

Conservation Objectives⁷

3.11 "Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;

- The extent and distribution of the habitats of the qualifying features
- The structure and function of the habitats of the qualifying features

⁷ Ilib

- *The supporting processes on which the habitats of the qualifying features rely*
- *The population of each of the qualifying features, and,*
- *The distribution of the qualifying features within the site."*

Current Pressures and Threats

3.12 The Site Improvement Plan⁸ identifies the following pressures and threats to the SPA:

- Coastal squeeze
- Air Pollution
- Risk of atmospheric nitrogen deposition
- Inappropriate scrub control
- Invasive species; Hydrological changes
- Public Access/Disturbance
- Inappropriate coastal management
- Fisheries
- Change to site conditions
- Inappropriate coastal Pressure Sefton Coast Partnership management
- Shooting/ scaring

⁸ <http://publications.naturalengland.org.uk/publication/4868920422957056>

4. Test of Likely Significant Effects

- 4.1 A test of likely significant effects (HRA Screening) has already been undertaken by Arcadis for Blackpool Council, but the assessment of the key pathways is referenced here to give the Appropriate Assessment context.

Background to Marton Moss Neighbourhood Area

- 4.2 Marton Moss is an area of Blackpool, located in the southeast corner of the Borough boundary. Blackpool is a large seaside town on the west coast of England. In the 2011 census the population of Blackpool was 139,720.
- 4.3 The remaining lands of the Moss have a semi-rural character with a mix of horticulture, equestrian, residential and other uses, as well as a network of lanes, hedgerows, ditches and verges all of which contribute to its distinct character. The distinctive character of the Moss reflects its historic past and its importance in more recent times as a market gardening area. Alongside remaining glasshouses, the lands are now used for a mix of horse grazing, other animal welfare, garden centres and dwellings set in large gardens, with other land in need of enhancement. The Moss lands are crossed by lanes and tracks with scattered dwellings and small businesses. While more development exists along the main highway frontages, the lands behind these frontages retain an essentially rural character, although very different from typical more open countryside.
- 4.4 The southern two-thirds of the Moss were designated a conservation Area in 2019 in order to strengthen existing powers to enable preservation and enhancement of its rural and agricultural character.
- 4.5 Before human settlement, Marton Moss was an area of open moss land with poorly drained peaty soils. The Area now supports an extensive network of drainage dykes that developed as the Moss was drained and became used for market gardening. These watercourses remain important for drainage and flood control purposes today and also act as significant wildlife habitats.
- 4.6 The Marton Moss Neighbourhood Area was established to give the people that live here the opportunity to create a Neighbourhood Forum and produce a Neighbourhood Plan and so some control over future development, rather than its inclusion in the Blackpool Local Plan (Part Two). The area known as Marton Moss is larger than that considered within the Neighbourhood Plan area, but these areas are either already developed or lie within the neighbouring Fylde Borough. Using the 2011 census the population of Marton Moss neighbourhood area can be best estimated at 1,249.
- 4.7 Marton Moss residents make up about 1% of Blackpool's total population, and the characteristics of the Marton Moss population, the homes the people live in and their economic status differ quite markedly from the residents of Blackpool as a whole. Compared to Blackpool, Marton Moss has: a greater proportion of older people and fewer in younger age groups; a much higher percentage of detached properties; a greater incidence of owner-occupied homes and far less rented properties; much higher average house prices and far less social deprivation. This demonstrates the potential need to plan housing developments in a different way than for Blackpool as a whole.

Physical scope of the HRA

- 4.8 There are no standard criteria for determining the ultimate physical scope of an HRA. Rather, the source-pathway-receptor model should be used to determine whether there is any potential pathway connecting any proposed development to any European sites.
- 4.9 The European sites that are described Section 3 and have been screened in for assessment are: Ribble and Alt Estuaries Ramsar site (4.2km south of the boundary), Ribble and Alt Estuaries SPA (4.2km south of the boundary).
- 4.10 Based upon Natural England Site Improvement Plans, there are several impact pathways that require consideration regarding increased development within the MMNP area and said European sites. The screening report has identified these as:

- Recreational pressure;

- Loss of functionally linked land;
- Air quality;
- Water quality
- Water resources
- Fragmentation;
- Habitat loss; and
- Disturbance/displacement

4.11 Table 2 describes these environmental impact pathways. The consideration of Neighbourhood Plan policies (the Test of Likely Significant Effects) is then documented in Table 3.

Table 2. Description of potential impact pathways from increased development to European Sites.

Impact pathway	
Water quality (surface water runoff)	Increased residential development within the Marton Moss area could lead to the loss of previously undeveloped land and increased surface water runoff to nearby European Sites. Flooding has been managed historically by a dense network of interconnecting dykes aligned to provide an outfall southward to watercourses flowing eventually in to the Ribble Estuary. This system has been poorly managed in recent years resulting in flooding within some parts of the Marton Moss area. Blackpool Council is pursuing improvements to these systems with landowners, and these improvements may lead to increased discharge into the Ribble Estuary, possibly having an effect on the Ribble and Alt Estuaries SPA and Ramsar sites. United Utilities have added two water attenuation basins in the Area to hold back runoff since 2018, and this may have reduced pressure on the existing drainage system. It is therefore unlikely any significant increase in surface water runoff will occur. Moreover, SuDS will be a requirement of all new development in the Neighbourhood Plan as a general principle (unrelated to protecting European sites) and there is a considerable separation distance between Marton Moss and the nearest European site, with Blackpool Airport intervening. As a result, this impact pathway has been screened out.
Water quality (surface water runoff and discharge of treated sewage effluent)	Increased housing development within the MMNP area could lead to increased sewage production. Therefore, it is necessary to consider any risk that increased sewage could degrade the water quality (i.e. through increased phosphorus discharge) of European Sites, in the absence of environmental mitigation and adequate wastewater treatment works. There is no hydrological connection between the MMNP area and the Ribble and Alt estuaries SPA and Ramsar site. Wastewater treatment and management is currently handled by United Utilities, who are responsible for water treatment for most of the North West of England. They have recently completed large scale developments in south Blackpool, with a particular focus of the Marton Moss area, to increase the capacity of the sewer network, reduce the volume of surface water entering the sewer network and update the existing wastewater pumping station at Lennox Gate. The existing stormwater outfall pipe at Harrowside has also been replaced, and it now extends to around 1km from the coastline, allowing the stormwater to disperse further out to sea and therefore reducing any impact on the important coastal sites nearby. It is unlikely the relatively small number of homes allocated by the MMNP will exceed the capacity of the wastewater treatment network that is now in place. Moreover, the estuaries of the north-west of England do not suffer from the same problems with smothering macroalgal growth as those of the south of England due to a combination of lower water temperatures, increased sediment loading reducing sunlight penetration and greater wave action. Changes in water quality as a result of the discharge of sewage effluent has therefore been screened out.
Air quality	Increased residential development could lead to a small increase in vehicles within the MMNP area. As such, increased air pollution could arise relative to a situation of no growth. Pollutants released from vehicles may be carried directly by wind currents and deposited to the Ribble and Alt SPA and Ramsar site or pollutants may become soluble and taken up during evaporation and deposited to said sites during precipitation. Guidance from the

	Institute of Air Quality Management and Highways England both set an impact zone of 200m from the roadside for potential significant air quality effects to vegetation from main road traffic. None of the European sites within the geographical scope of this HRA are within 200m of a main road that would be a key journey to work route for residents of Marton Moss and they have thus all been screened out.
Disturbance/displacement	There is the potential that any construction that occurs may cause some disruption to qualifying species within European sites. Disruption may be caused by noise, visual and lighting disturbance during construction and operational phase of new developments. However, the boundary of the MMNP area is 4.2km from the Ribble and Alt SPA/Ramsar site on the opposite side of Blackpool Airport, and therefore is very unlikely to cause any disturbance.
Loss of functionally-linked habitat	On 16 th February 2021 Natural England confirmed to Arcadis (who wrote the HRA screening for this Neighbourhood Plan on behalf of the Council) that allocations in the south of the Marton Moss Neighbourhood area did not constitute functionally-linked land for SPA birds. However, Natural England identified that some of the proposed site allocations in the north of the MMNP area could do so, although it must be noted that a significant area of nearby land, much of it suggested for housing development in the Call for Sites and amounting to 21 hectares, is proposed in the Neighbourhood Plan to remain as open land thus minimizing pressure on potential functionally-linked land. Therefore, Blackpool Council screened in functionally linked land for the Ribble and Alt Estuaries SPA and Ramsar site regarding the northern allocations in the MMNP. In October 2021 Natural England recommended three further sites to be considered for potential as functionally-linked land (MM19, MM20 and MM25). These are therefore all subject to appropriate assessment in this report.
Recreational pressure	Increased development within the MMNP area could lead to higher numbers of visitors to European Sites, particularly those within relatively easy recreational access. For example, the nature, scale, timing, and duration of some human activities can result in the disturbance of birds at a level that may substantially affect their behaviour, and consequently affect the long-term viability of the population. As the MMNP area is only around 2km away from the coast, it is of particular concern that any increase in population would cause a rise in visitors to vulnerable coastal areas. The housing allocations all have easy access to coast SACs, and most are within walking distance from functionally linked land. Therefore, it is probable that there will be increased recreational pressure. Increased visitors can have direct and indirect impacts for a European Site that could prevent said site achieving its conservation objectives. The relevant European Site impacted by recreational pressure is Ribble and Alt Estuaries SPA and Ramsar site.

Table 3. Screening assessment (likely significant effect) of the MMNP.

Policy	European Sites and Proximity to Policy Area	Brief summary	Screening outcome
Policy 1: Building Design	N/A	This policy sets out what housing densities are appropriate to both the Conservation Area and the remainder of the Neighbourhood Area. The policy also sets out the criteria for the design of new buildings and extensions. This policy will not lead directly to development.	No likely Significant Effect. Screened out. This is a development management policy and does not specifically allocate sites for development. Therefore, no impact pathways exist to European Sites.
Policy 2: Open Land Character	N/A	This policy relates to the safeguarding of significant open land from inappropriate development. This policy will not lead directly to development.	No likely Significant Effect. Screened out. This is a development management policy and does not specifically allocate sites for development. Therefore, no impact pathways exist to European Sites.
Policy 3: School Road/Midgeland Road Junction	N/A	This policy relates to the maintenance of the appearance of the land fronting the School Road / Midgeland Road Junction. This policy will not lead directly to development.	No likely Significant Effect. Screened out. This is a development management policy and does not specifically allocate sites for development. Therefore, no impact pathways exist to European Sites.
Policy 4: Housing Site Allocations	Ribble and Alt Estuaries SPA and Ramsar – 2.4km west of the MMNP area	This policy identifies land proposed for housing by formally allocating sites which are the most appropriate for residential development.	Likely Significant Effect. Screened in. Policy allocates 62 houses across 21 sites. The Council's HRA screening report produced by Arcadis identifies recreational pressure impacts and (for allocations in the north of the MMNP area and three others identified by Natural England: MM19, MM20 and MM25) loss of functionally-linked land cannot be screened out.
Policy 5: Windfall Housing	N/A	This policy relates to the restriction of development within unallocated plots. This policy will not lead directly to development.	Likely Significant Effect. Screened in. Windfall housing could result in an effect on the Ribble & Alt Estuaries SPA/Ramsar site through the same pathways as actual allocations. Therefore, this policy cannot be screened out.
Policy 6: Market Gardening	N/A	This policy relates to the support for market gardening and redevelopment of these holdings. This policy does not make any allocations or identify a quantum of growth.	No likely Significant Effect. Screened out. Redevelopment of land used for market gardening could result in impacts on European sites depending on the type of development involved (for example housing development would result in recreational pressure impact on Ribble & Alt Estuaries SPA/Ramsar site). However, this policy is primarily about retaining market gardening in Marton Moss and the policy does not identify a quantum of growth or make any allocations. Therefore, this policy will not result in significant effects on European sites.
Policy 7: Horse Stabling and Riding Activities	N/A	This policy relates to support for equestrian development and sets out the design requirements	No likely Significant Effect. Screened out. Equestrian development may have likely significant effects on European sites depending on where they occur (e.g. loss of functionally linked land). However, this policy does not identify a quantum of growth or make any allocations.

			Therefore, this policy will not result in significant effects on European sites.
Policy 8: Midgeland Farm	N/A	This policy relates to enabling the restoration and community use of Midgeland Farm as a community park (11ha total within Marton Moss).	No likely Significant Effect. Screened out. This is a positive policy for restoration and introduction of community/recreational use to a large (11ha) site within Marton Moss parish. Therefore, no impact pathways exist to European Sites.
Policy 9: Local Green Space	N/A	This policy relates to the protection of land that is used for recreational purposes and only supports the erection of small-scale buildings or similar structures that are essential and directly related to the recreational use of the land.	No likely Significant Effect. Screened out. This is a development management policy and does not specifically allocate sites for development. Therefore, no impact pathways exist to European Sites.
Policy 10: Footpaths, Bridleways and Cycle Routes	N/A	This policy relates to the improvement of the provision of paths and other routes through directly related developer-funded 'planning gain' requirements. It requires development proposals to improve accessibility to the existing footpath network.	Likely Significant Effect. Screened in. Improved footpaths and bridleways could result in likely significant effects on Ribble & Alt Estuaries SPA/Ramsar site depending on what paths are involved and of what the improvements consist. Therefore, likely significant effects cannot be dismissed.

5. Appropriate Assessment

- 5.1 The law does not prescribe how an appropriate assessment should be undertaken or presented but the appropriate assessment must consider all impact pathways that have been screened in, whether they are due to policies alone or to impact pathways that arise in combination with other projects and plans. That analysis is the purpose of this section. The law does not require the 'alone' and 'in combination' effects to be examined separately provided all effects are discussed.
- 5.2 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 internationally designated site(s) in question.
- 5.3 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 case¹.
- 5.4 For the purposes of this assessment, we have determined that, due to the nature of the identified impacts, the key other plans and projects with potential for in combination likely significant effects are those schemes that have the following impact pathways: recreational pressure and impact on functionally linked land. The following plans have been assessed for their in-combination impact to interact with the Marton Moss Neighbourhood Plan:
- Blackpool Local Plan Part 1 (adopted 2016) and Local Plan Part 2 (submitted for Examination June 2021) – the Local Plan Part 1 aims to deliver 4200 (net) new homes in Blackpool between 2012 and 2027
 - Fylde Local Plan (adopted 2018, Local Plan partial review currently underway) – A minimum of 6,895-8,715 dwellings between 2011 and 2032;
 - West Lancashire Local Plan (adopted 2013, new Local Plan in early stages) – A minimum of 4,860 dwellings between 2012 and 2027; and
 - Sefton Local Plan (adopted 2017) – a minimum of 11,520 dwellings between 2012 and 2030.
- 5.5 This amounts to over 29,000 dwellings in these four authorities over the period to 2032. Moreover, residents of Liverpool could also visit Ribble & Alt Estuaries SPA/Ramsar and that authority is planning to deliver 34,780 dwellings (net) to 2032/33. Therefore, an additional 65,000 dwellings or above are being delivered in the authorities around the Ribble & Alt Estuaries SPA and Ramsar site to 2032. The Fylde Local Plan HRA and the Blackpool Local Plan Part 1 and 2 HRAs concluded there would be no likely significant effect on any European sites from growth in Blackpool and Fylde. However, it is clear from Natural England correspondence over MMNP that they consider that recreational pressure and loss of functionally-linked land effects cannot be dismissed as posing no likely significant effect on European sites.
- 5.6 The main impact pathways of concern to this HRA (recreational pressure and loss of functionally linked land) are inherently 'in combination' with neighbouring plans and projects, in that Marton Moss and its housing allocations are far too small to result in a significant effect by themselves but only 'in combination' with other plans and projects. However, for completeness, potential impacts of the 62 net residential dwellings allocated within the Marton Moss Neighbourhood Plan area in isolation are also assessed. Therefore, the appropriate assessment considers the effects of growth in MMNP in combination with growth in the Blackpool, Fylde, West Lancashire, Sefton and (potentially) Liverpool Local Plans.
- 5.7 The HRA screening exercise undertaken in Table 2 indicates three NP policies (Policies 1, 5 and 10) that will encompass the 21 potential site allocations as well as windfall development and improvement of connectivity to existing footpaths and bridlepaths. These may have effects on the European Sites due to recreational pressure and loss of functionally linked land when considered in combination with the overall quantum of growth outlined in the Local Plans discussed above. At the screening stage, following advice

¹ Waddenzee case (Case C-127/02, [2004] ECR-I 7405)
Prepared for: Marton Moss Neighbourhood Forum

from Blackpool Council, the following potential housing allocations were screened in either for loss of functionally-linked land (those sites in the north of Marton Moss plus MM19, MM20 and MM25 as recommended by Natural England) and recreational pressure (all allocations) and thus require further assessment:

- A. MM29 - Adj. to Fern Bank, Division Lane
- B. MM19 - Adj. to 322, Common Edge Road
- C. MM26 - Adj. to Primrose Terrace, School Road
- D. MM20 - Adj. to Ral Mar, Sandy Lane
- E. MM27 - Adj. to Lemmington House, Worthington Road
- F. MM21 - The Bungalow Nurseries, Worthington Road
- G. MM18 - Corner of Midgeland Road and Kitty Lane
- H. MM13 - Caradaw Farm, School Road
- I. MM22 - Adj. to Rushy Meade, School Road
- J. MM23 - Adj. to Larchfield, St. Nicholas Road
- K. MM25 - Former Klondyke Nurseries, St. Nicholas Road
- L. MM24 - Adj. to 9 Fishers Lane
- M. MM9 - Between 231 & 245 Midgeland Road
- N. MM16 - Former Marina Nurs, New Hall Avenue
- O. MM17b - Remaining land at former Baguley's Garden Centre, off Midgeland Road
- P. MM14b - Dean Nurseries, Chapel Road
- Q. MM14a - The Hollies, Chapel Road
- R. MM10 - Adj. to 1 Runnell Villas, Chapel Road
- S. MM5 - Off Magnolia Way
- T. MM31 - Adj. to Moss Lodge, Jubilee Lane North
- U. MM30 - Adj. to 58 Stockydale Road

5.8 Figure 2 below shows the proposed locations of these housing allocations.

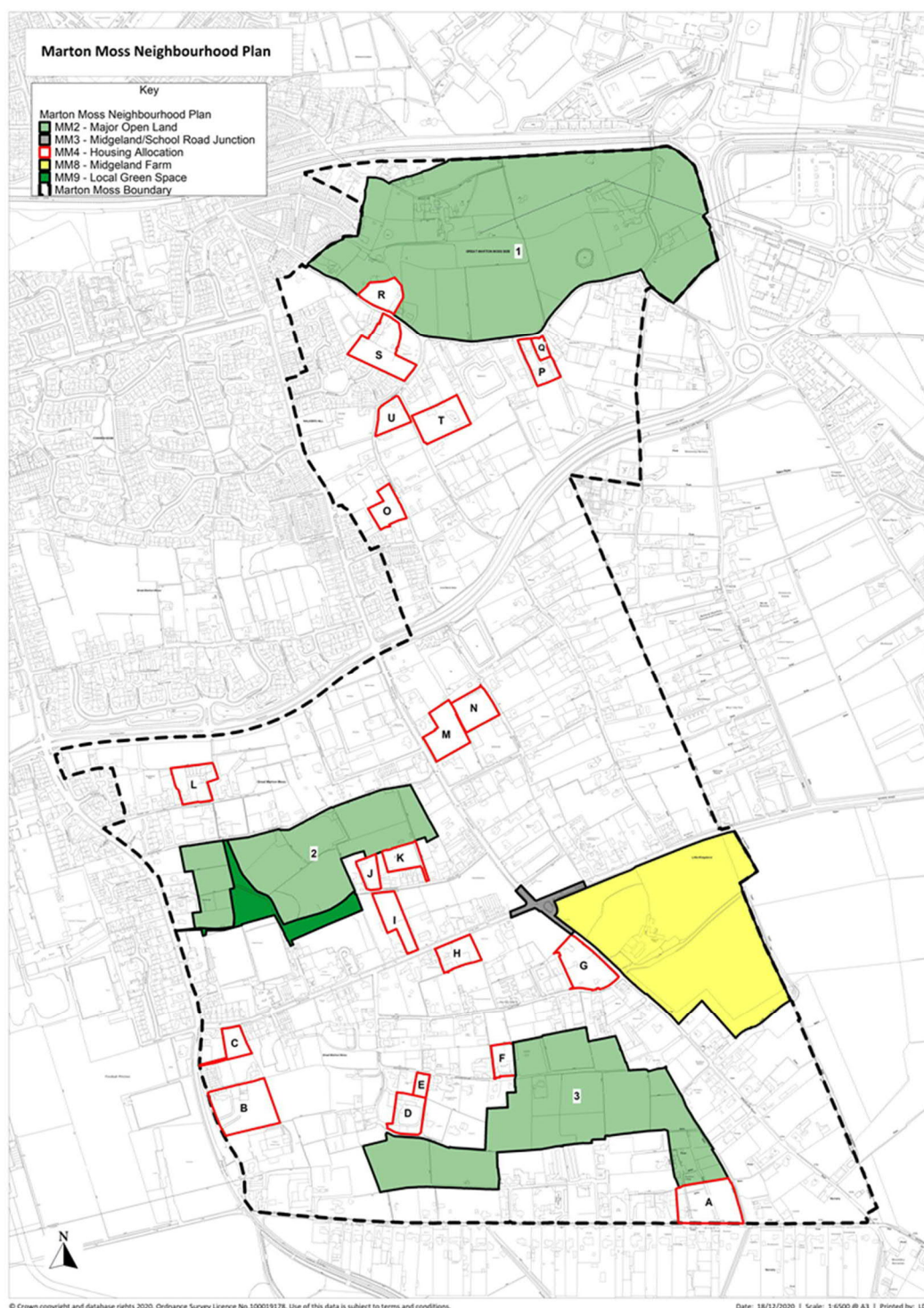


Figure 2. Housing site allocations for Marton Moss

Recreational pressure

- 5.9 There is growing concern over the cumulative impacts of recreation on key nature conservation sites in the UK, as most sites must fulfil conservation objectives while also providing recreational opportunity. Various research reports have provided compelling links between changes in housing and access levels and impacts on European protected sites². This applies to any habitat, but the additional recreational pressure from housing growth on coastal destinations is likely to be especially strong and some of the qualifying waterfowl

² Liley D, Clarke R.T., Mallord J.W., Bullock J.M. 2006a. The effect of urban development and human disturbance on the distribution and abundance of nightjars on the Thames Basin and Dorset Heaths. Natural England / Footprint Ecology. Liley D., Clarke R.T., Underhill-Day J., Tyldesley D.T. 2006b. Evidence to support the appropriate Assessment of development plans and projects in south-east Dorset. Footprint Ecology / Dorset County Council
Prepared for: Marton Moss Neighbourhood Forum

are known to be susceptible to disturbance. Different European sites are subject to different types of recreational pressures and have different vulnerabilities. Studies across a range of species have shown the effects from recreation can be complex. HRAs of plans tend to focus on recreational sources of disturbance as a result of new residents but an aging population is also relevant³.

- 5.10 Human activity can affect organisms directly (e.g. loss of habitat or by causing species to flee) and indirectly (e.g. by damaging their habitat or reducing their fitness in less obvious ways e.g. stress). The most obvious direct effect is the loss of habitat as a result of increased visitors to a site (i.e. trampling). But human activity can also lead to much subtler behavioural (e.g. alterations in feeding behaviour, avoidance of certain areas and use of sub optimal areas etc.) and physiological changes to species (e.g. an increase in heart rate). While these are less noticeable, they might result in major population-level changes by altering the balance between immigration/birth and emigration/death⁴.
- 5.11 At the screening stage two overlapping European Sites with similar interest features were identified that could be impacted by recreational pressure. These are Ribble and Alt Estuaries SPA and Ribble and Alt Estuaries Ramsar site.
- 5.12 Impacts of recreational pressure for Ribble and Alt Estuaries SPA/Ramsar would likely be through more indirect means such as disturbance of species. For example, the impact of bird disturbance has been particularly well studied. Much research concern stems from the fact that birds expend energy unnecessarily when disturbed and the time they spend responding to humans is time that is not spent feeding⁵. Disturbance therefore risks increasing energy expenditure of birds while reducing their energy intake, which can adversely affect their 'condition' and ultimately their survival. Additionally, displacement of birds from one feeding site to others can increase the pressure on the resources available within the remaining sites, as they then must sustain a greater number of birds⁶.
- 5.13 Evidence in the literature suggests that the magnitude of disturbance clearly differs between different types of recreational activities. For example, dog walking leads to a significantly higher reduction in bird diversity and abundance than hiking⁷. Scientific evidence also suggests that key disturbance parameters, such as areas of influence and flush distance, are significantly greater for dog walkers than hikers⁸. A UK meta-analysis suggests that important spatial (e.g. the area of a site potentially influenced) and temporal (e.g. how often or long an activity is carried out) parameters differ between recreational activities, suggesting that activity type is a factor that should be taken into account in HRAs⁹.
- 5.14 A comprehensive study was conducted to investigate the impacts of recreational disturbance on bird populations in protected sites on the north west coast of England, including sites in the Ribble and Alt Estuaries SPA/Ramsar site¹⁰. Three of the sites sampled were located within the Ribble and Alt Estuaries SPA/Ramsar site. These were Fairhaven, which is located just 4.9km away from the MMNP area, Church Scar Lytham (5.7km) and Marshside (11.7km).
- 5.15 For most sites sampled, dog walking was found to be the most common activity. However, for Church Scar and Fairhaven walking was found to be the most popular activity of people visiting the site. At Fairhaven the saltmarsh was found to act as a natural barrier between birds and people on most tides. This meant that disturbance is most likely on spring tides which can almost reach the footpath, pushing the birds and access in close proximity.
- 5.16 Church Scar was found to be the busiest site sampled with a high number of walkers continuously passing along the promenade at the top of the beach. Actual disturbance here was found to be relatively low but this

³ The RTPi 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'.

⁴ Riley, J. 2003. Review of Recreational Disturbance Research on Selected Wildlife in Scotland. Scottish Natural Heritage.

⁵ Riddington, R. et al. 1996. The impact of disturbance on the behaviour and energy budgets of Brent geese. *Bird Study* 43:269-279

⁶ Gill, J.A., Sutherland, W.J. & Norris, K. 1998. The consequences of human disturbance for estuarine birds. *RSPB Conservation Review* 12: 67-72

⁷ Banks P.B., Bryant J.Y. 2007. Four-legged friend or foe? Dog walking displaces native birds from natural areas. *Biology Letters* 3: 14pp.

⁸ Miller S.G., Knight R.L., Miller C.K. 2001. Wildlife responses to pedestrians and dogs. 29: 124-132.

⁹ Weitowitz D., Panter C., Hoskin R., Liley D. The spatio-temporal footprint of key recreation activities in European protected sites. Manuscript in preparation.

¹⁰ Liley, D., Panter, C., Marsh, P. & Roberts, J. (2017) Recreational activity and interactions with birds within the SSSIs on the North-West coast of England. Report for Natural England.

is likely due to the area generally being used less by birds as a result of the large quantities of people regularly using the site.

- 5.17 At Marshside, a path providing access to the water's edge was responsible for most of the disturbance at this site, with birds such as Pink-footed Geese flushed when visitors strayed from the path.
- 5.18 The survey indicated that the mean (average) distance travelled by visitors to reach the Ribble Estuary varied depending on survey point from 1.7km to 6.1km (Table 13 of the report). Seventy-five percent of visitors lived within c.2-4.4km of the SPA/Ramsar site. The Blackpool LPP2 HRA states that the zone of influence for the Ribble Estuary is 1.3km. However, the Blackpool Council screening assessment of the MMNP screens in recreational pressure notwithstanding the fact that Marton Moss is well over 1.3km from the SPA/Ramsar. Moreover, in 2019 Natural England advised West Lancashire Council for the north-west coastal SPAs emerging survey work indicated that 5.2km was an appropriate Zone of Influence (ZoI) to consider. The entirety of Marton Moss NP area lies within 5km of the SPA/Ramsar site and it is therefore entirely possible residents might visit the SPA/Ramsar site.
- 5.19 If the proposed 60 new dwellings are built, there is therefore an increased risk of recreational pressure on some protected areas that are already under large amounts of pressure from the existing and growing local population, when considered in combination with growth across authorities around the SPA/Ramsar site. However, the degree of risk from Marton Moss is likely to be considerably less than from areas closer to the SPA/Ramsar:
- the separation of visitors and birds (such as was identified at Fairhaven) may mean disturbance events do not materially increase. For example, the study completed by Natural England concluded that it would be beneficial at Fairhaven to install clear, bold and simple signage at the steps and have face-face engagement, with the aim of directing people to keep dogs on leads if the tide is high or to walk well inshore, near the dunes.
 - An application for housing development in Fylde on the former Pontins site west of Blackpool Airport on Clifton Drive North required a fully detailed Ecological Mitigation and Management Plan in response to increased disturbance/recreational pressure to include as appropriate measures to restrict access to identified sensitive areas of the SPA; provision of a dedicated and fenced dog exercise area; management of car parking; path design and management; interpretation signs and leaflets; Codes of Conduct Guidance; Coastal Ranger; appropriate monitoring of the site; along with other measures. This has been implemented.
 - Fylde also has a Dune Management Plan, which actively manages the dunes and foreshore.
 - There are already several policies in the Neighbourhood Plan (specifically Policy 8 and Policy 10) that are intended to improve recreational connectivity and capacity around Marton Moss. In particular, Policy 8 concerns the restoration of Midgeland Farm, currently closed to the general public, as a community park. The area of Midgeland Farm within Marton Moss totals 11ha. This will therefore provide a significant new semi-natural recreational resource for residents of Marton Moss and contribute significantly to reducing the need for residents to travel outside the area or to the SPA/Ramsar for recreation.
 - The Blackpool Local Plan already contains policies regarding protection of European sites (Policy CS6 in LPP1 and DM35 in LPP2) to ensure the protection of national and international sites.
- 5.20 Given this context, it is quite possible that adverse effects from recreation on the integrity of the European site of relevance to the Marton Moss Neighbourhood Plan area can be reasonably concluded not to arise. However, it is recommended that, in line with other planning applications for residential development being granted in Fylde and Blackpool, text should be added to the Neighbourhood Plan confirming that residential development will only be supported if the developer commits to providing homeowner packs to new residents identifying the disturbance sensitivity of the wintering waterfowl using the Ribble Estuary, encouraging responsible dog ownership and identifying other areas of accessible greenspace that could be visited as an alternative. Similarly, improvements to access to existing footpaths and bridlepaths should be contingent on them not exacerbating recreational pressure issues at the SPA/Ramsar site.

Loss of functionally linked land

- 5.21 While most European sites have been geographically defined to encompass the key features that are necessary for coherence of their structure and function, and the support of their qualifying features, this is not always the case. A diverse array of qualifying species including birds, bats and amphibians are not confined to the boundary of designated sites.

- 5.22 For example, the highly mobile nature of both wildfowl and heathland birds implies that areas of habitat of

crucial importance to the maintenance of their populations are outside the physical limits of European sites. Despite not being part of the formal designation, this habitat is still integral to the maintenance of the structure and function of the interest feature on the designated site and, therefore, land use plans that may affect such areas should be subject to further assessment. Examples of other mobile qualifying species are great-crested newts and bats.

- 5.23 The Ribble and Alt Estuaries SPA/Ramsar site supports very large populations of birds that likely rely on habitat in the surrounding area, especially with increased recreational disturbance in coastal areas as referenced above. The screening report, with assistance from Natural England, identified areas in the north of the NP area as well as three other sites (MM19, MM20 and MM25) as possible functionally linked land. The relevant sites are shown in table 4 below with locations above in Figure 2.
- 5.24 A number of developments close to the MMNP area have been assessed for planning permission in recent years and in consultation over this MMNP HRA Natural England directed AECOM to recent applications around Blackpool Airport. Wintering bird surveys had been carried out in these sites to assess their potential their impacts on functionally linked land, and these results may give us better understanding into the potential impact of developing the close by sites within the MMNP area. The two sites are:
- 19/0391 – an industrial building at Land at Amy Johnson Way, Blackpool FY4 2FF
 - 20/0564 – Blackpool Airport enterprise zone sports facilities, Blackpool FY4 5DY
- 5.25 Surveys of both sites identified the presence of oystercatcher, which is an SPA/Ramsar species, but also concluded that the birds were present at numbers too small to constitute a significant proportion of the SPA population (i.e. more than 1% of the SPA population).
- 5.26 In addition, the Queensway application for over 800 dwellings (now consented) required the designation of 91.5ha of farmland for mitigation providing managed habitats for foraging SPA species located to the east and north of the Queensway site and south of the MMNP area. This is therefore likely to be the key area of functionally-linked land in the broad area, rather than the potential development sites in Marton Moss.
- 5.27 Whether a given land parcel might serve as an important area of functionally-linked land is dependent on a range of factors such as habitat present, exposure to disturbance, presence of clear sightlines and parcel size. This latter is important since the smaller the land parcel the less likely it is to be capable of supporting a significant proportion of the SPA/Ramsar wintering/passage bird population. In considering functionally-linked land significant areas are generally considered to be those that support more than 1% of the SPA/Ramsar population of a given species on a regular basis. The percentage is set so low to capture potential 'in combination' effects (i.e. a parcel that regularly supports 1-2% of the SPA population of a particular bird species will not be significant to the integrity of the SPA/Ramsar site by itself, but will be so when considered cumulatively and 'in combination' with the many other such land parcels around the coast).
- 5.28 This is a relevant consideration because although some of the land parcels allocated for housing development in the Neighbourhood Plan appear to contain suitable habitat, they are all very small (typically c. 0.5ha or smaller) and many of them are fragmented or have poor sightlines due to trees and scrub within the parcels.

Table 4. Housing allocations proposed in the north of the NP area, in addition to three other allocations recommended for consideration by Natural England, and their potential to serve as significant areas of functionally linked land for passage/wintering waterfowl and waders associated with Ribble & Alt Estuaries SPA/Ramsar site

Site reference	Map reference	Location	Habitat description
MM17b	O	Remaining land at former Baguley's Garden Centre, off Midgeland Road	Overgrown rank grassland unlikely to be used by SPA birds. Site area 0.38ha so unlikely to be of significance even if habitat was suitable due to very small size. Residential properties to north west and south exposing the site to disturbance. Moreover, there is a planning permission on Baguley's Garden Centre (18/0642) which did not require an HRA.
MM14b	P	Dean Nurseries, Chapel Road	Unsuitable for SPA birds. Existing built development containing large residential property with mature gardens and trees and hedgerow with outbuildings and garage

MM14a	Q	The Hollies, Chapel Road	Site around approx. 1ha but consists of built development comprising out buildings and tarmac and mature residential garden with mown lawn. To west and east of site are 2 scrap yards which will cause significant disturbance of the area.
MM10	R	Adj. to 1 Runnell Villas, Chapel Road	Site area 0.4ha. Small field adjacent to residential property with mature trees in the west part of the site with trees and scrub in the north part. Grassed area appears maintained as part of property to the east. Unlikely to be suitable for SPA birds.
MM5	S	Off Magnolia Way	Two fields, the largest of which is 0.3ha. The intervening hedgerow/treeline and surrounding built development means sightlines would be poor.
MM31	T	Adj. to Moss Lodge, Jubilee Lane North	Site area 0.58ha. Residential property with maintained garden and pond with mature hedgerow and trees. Unlikely to be suitable as functionally-linked land
MM30	U	Adj. to 58 Stockydale Road	Site 0.24ha. Residential plot with maintained garden with mature trees to surrounding boundary. Unlikely to be suitable for SPA birds.
MM19	B	Adj. to 322, Common Edge Road	Site 1.2ha. Former stables and paddocks. Excluding buildings and hardstanding and areas of scrub the total grassland area is c. 0.7ha which is too small or the site to be likely to be significant functionally-linked land. The cricket and rugby pitches opposite could potentially constitute functionally-linked land for some SPA bird species during the winter but is subject to disturbance and is on the opposite side of two roads and thus lies approximately 30m from the allocated site at its closest.
MM20	D	Adj. to Ral Mar, Sandy Lane	Site consists primarily of buildings and hardstanding with several small paddocks. The total paddock area is c. 0.2ha but the largest central paddock is surrounded by an access track and buildings and thus subject to considerable disturbance. The other paddocks are small slivers. The total area of paddock is too small for this site to be likely to be significant as functionally-linked land. There are several large fields opposite which could potentially be functionally-linked land but they are screened from the development site by large hedgerows.
MM25	K	Former Klondyke Nurseries, St. Nicholas Road	The total greenfield area is 0.2ha and the field has poor sight lines due to being surrounded by very tall dense hedgerows. As such it is very unlikely to be significant as functionally-linked land. The complex of fields to the north could serve as functionally-linked land but they are screened from the development site by the aforementioned large hedgerows.

5.29 Taking account of the small size of the sites, the presence of disrupting hedgerows and treelines and the presence of tall grassland or urban form (tarmac and buildings) none of the sites appear very likely to be significant as areas of functionally linked habitat for SPA/Ramsar birds (i.e. support more than 1% of the SPA/Ramsar population of any qualifying species on a regular basis). Moreover, the Blackpool Local Plan already contains policies regarding protection of European sites (Policy CS6 in LPP1 and DM35 in LPP2) to ensure the protection of national and international sites and which will require this issue to be reconsidered if necessary once planning applications are devised. Moreover, the restoration of Midgeland Farm (11ha), if done sensitively, has the potential to result in a net increase in functionally-linked habitat in Marton Moss.

6. Conclusions

- 6.1 This assessment undertook both Screening and Appropriate Assessment of the policies and the proposed allocations resulting from the Area's Call for Sites.
- 6.2 The international designated sites considered within the Appropriate Assessment for impact pathways that could not be screened out at the screening stage were:
 - Ribble and Alt Estuaries SPA
 - Ribble and Alt Estuaries Ramsar
- 6.3 Impact pathways considered during the screening were: recreational pressure and loss of functionally linked land.
- 6.4 Twenty-one potential Site Allocations to provide net new residential development were subject to Appropriate Assessment as they were located within the accepted zones of influence of the aforementioned international sites and could result in adverse effects on the integrity of an international site in combination with other projects and plans.
- 6.5 Following Appropriate Assessment, it is concluded that, provided the recommended changes outlined in this HRA are included in the plan, the Marton Moss Neighbourhood Plan will contain sufficient policy framework to ensure no adverse effects on the integrity of international designated sites will occur in isolation or in combination with other projects and plans. The recommendations are as follows:
 - For recreational pressure, the Neighbourhood Plan should add a caveat that residential development will only be supported if the developer commits to providing homeowner packs to new residents identifying the disturbance sensitivity of the wintering waterfowl using the Ribble Estuary, encouraging responsible dog ownership and identifying other areas of accessible greenspace that could be visited as an alternative. Similarly, improvements to access to existing footpaths and bridlepaths should be contingent on them not exacerbating recreational pressure issues at the SPA/Ramsar site.
- 6.6 With these recommendations added to the Neighbourhood Plan it is considered a sufficient policy framework would exist to ensure no adverse effect on the integrity of any European sites.