



Pembrokeshire County Council Local Development Plan: Habitats Regulations Appraisal Report

Deposit Plan

Consultation: 26 January 2011 – 9 March 2011

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Non-technical summary

Habitats Regulations Appraisal (HRA) is a requirement of the Conservation of Habitats and Species Regulations 2010 (the Habitats Regulations)¹ that transpose the Habitats Directive (92/43/EEC) to determine whether a plan is likely to have significant effects on sites designated for their European importance for nature conservation – Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). This document reports the HRA process of the Pembrokeshire County Council Local Development Plan (LDP). HRA has been undertaken at every stage in Plan preparation.

HRA screening of the likely significant effects of the LDP policies included the identification of European sites, a description of the Plan and identification of potential effects of the Plan, alone and in-combination with other Plans. The policies were screened with reference to the management plans for the European sites for likely significant effects.

An initial screening² of the Preferred Strategy concluded that there was potential for likely significant effects at 9 European sites, and the potential for 'in-combination' effects was identified at 3 European sites:

Potential likely significant effects at:

- Carmarthen Bay and Estuaries SAC
- Pembrokeshire Marine SAC
- North West Pembrokeshire Commons SAC
- North West Pembrokeshire Woodlands SAC
- Pembrokeshire Bat Sites and Bosherston Lakes SAC
- Preseli SAC
- Afon Teifi SAC
- Afonydd Cleddau SAC
- Yerbeston Tops SAC.

Potential for in-combination effects at:

- Cardigan Bay SAC
- Carmarthen Bay SPA
- · Carmarthen Bay Dunes SAC.

The main impacts of the Preferred Strategy and the subsequent LDP Deposit may arise as a result of the housing and employment policies, and specific land allocations.

The LDP Deposit policies and allocations have been assessed and the Plan has been revised to ensure that there would be no likely significant effect on SACs and SPAs. LDP policies were strengthened in relation to the Protection and Enhancement of Biodiversity (GN 36), and other policies were also

¹ Which consolidate and update the Conservation (Natural Habitats &c.) (Amendments) Regulations 1994, as amended which were amended in 2007 and again in 2009.

² PCC LDP Paper: Habitats Regulations Assessment Screening Report Preferred Strategy, August 2009 available at:

http://www.pembrokeshire.gov.uk/content.asp?id=14098&nav=109,141,1014

reinforced to provide effective policy mitigation to address issues which arose at the various stages throughout the development of the plan and associated HRA. The adopted Plan will be monitored annually and subject to four year review, with provision for more frequent review if required, therefore any likely significant effects can be identified and the Plan modified if necessary.

Commenting on this report

This report will be subject to consultation from 26 January 2011 to 5.00 p.m. on 9 March 2011. Please comment on this HRA Report using the response form in Appendix 5 of this report.

Habitats Regulations Appraisal of the Local Development Plan Chapter 1: Introduction

- 1.1 This document seeks to screen and assess the LDP, through Habitats Regulations Appraisal according to the Conservation of Habitats and Species Regulations 2010. The Responsible Authority has considered the criteria included within Technical Advice Note 5 (2009) Annex 6 and has determined that the Local Development Plan for Pembrokeshire County Council is unlikely to have a likely significant effect on European sites (alone or in combination with other Plans or projects) and therefore will not require appropriate assessment as required by Article 6(3) of the Habitats Directive (92/43/EEC) and the Conservation of Habitats and Species Regulations 2010. There is a requirement for pSPAs, cSACs and Ramsar sites to be included within the Habitats Regulations Appraisal (HRA) process.
- 1.2 This document will outline the process which has been followed for this HRA. The method and approach used for this appraisal is based on Welsh guidance currently available³ and discussions with the Countryside Council for Wales throughout the process. The HRA has three main stages (Table 1). This report outlines the findings for Stage 1, the screening for likely significant effects on European sites.

1.3 This document includes:

- An outline of the method used to screen and assess the Local Development Plan (Chapter 2);
- A brief summary of the Local Development Plan (Chapter 3):
- HRA Screening of Policies and Allocations (Chapter 4);
- Mitigation and avoidance (Chapter 5);
- · Conclusions (Chapter 6).

1.4 The appendices contain the full assessments. Appendix 1 provides the criteria and screening of the policies. Appendix 2 has the full assessment of the land allocations. A summary of the screening of the SACs and SPAs is in Appendix 3. Appendix 4 details the changes made to the policies taking into account comments from the Countryside Council for Wales. The Response Form for consultation is in Appendix 5.

The Appraisal of Plans under the Habitats Directive, Draft guidance, CCW, Nov 2009 (revised April 2010).

³ The Assessment of Development Plans in Wales under the Provisions of the Habitats Regulations (DRAFT) WAG, 2006 and EU guidance.

TABLE 1: Habitats Regulations Appraisal: Key Stages						
Stage 1						
Screening for likely significant effect	 Identify international sites in and around the Plan/strategy area in search area/ buffer zone agreed with the Statutory Body, the Countryside Council for Wales Examine conservation objectives of the interest feature(s) (where available) Review Plan policies and proposals and consider potential effects on European sites (magnitude, duration, location, extent) Examine other Plans and programmes that could contribute to 'in combination' effects If no effects likely – report no significant effect (taking advice from CCW as necessary). If effects are judged likely or uncertainty exists – the precautionary principle applies proceed to stage 2 If following screening the policies are reviewed and include sufficient mitigation which will ensure no likely significant effects, then no further Appropriate 					
	Assessment needed.					
Stage 2						
Appropriate Assessment	 Complete additional scoping work including the collation of further information on sites as necessary to evaluate impact in light of conservation objectives Agree scope and method of AA with CCW Consider how Plan 'in combination' with other Plans and programmes will interact when implemented (the Appropriate Assessment) Consider how effect on integrity of site could be avoided by changes to Plan and the consideration of alternatives Develop mitigation measures (including timescale and mechanisms) Report outcomes of AA including mitigation measures, consult with CCW and wider [public] stakeholders as necessary If the Plan will not adversely affect European site integrity proceed with Plan, but ensure that policies are monitored. If effects or uncertainty remain following the consideration of alternatives and development of mitigations proceed to stage 3 					
Stage 3	miligations proceed to stage 5					
Procedures where significant effect on integrity of international site remains	 Consider alternative solutions, delete from Plan or modify Consider if priority species/ habitats affected Identify 'imperative reasons of overriding public interest' (IROPI) economic, social, environmental, human health, public safety (only applicable in highly exceptional circumstances, therefore unlikely for an LDP) Notify Welsh Assembly Government Develop and secure compensatory measures 					

Chapter 2: Method

- 2.1 The Local Development Plan HRA screening has been undertaken using best available guidance⁴ and discussed with the Countryside Council for Wales (CCW) at various stages in the process. The approach used encompasses three components, firstly by screening the policies of the Plan for likely significant effects on European sites, and secondly by screening the specific land allocations in the Plan, and finally, by looking at the European sites and determining what aspects of the Plan could potentially affect the sites. Guidance states that the level of detail is appropriate to the nature and geographic area of the Plan.
- 2.2 The initial screening stage (at Preferred Strategy) comprised the following key tasks:
- Description of the Plan, identification and description of the European sites;
- Review of the Plan policies and identification of likely impacts;
- Identification of projects and Plans to be considered in combination;
- Consultation with the statutory consultees as part of the LDP consultation.
- The report is available on the Pembrokeshire County Council website (www.pembrokeshire.gov.uk/Planning).
- 2.3 The stages undertaken for this report which describes the assessment of the LDP Deposit involved:
- Completing additional scoping work including the collation of further information on sites where necessary to evaluate impact in light of conservation objectives;
- Agree scope and method of HRA with CCW;
- · Screen updated policies and land allocations specified in the LDP;
- Consider how the Plan 'in combination' with other Plans and programmes will interact when implemented;
- Consider how the effect on integrity of the site could be avoided by changes to Plan and the consideration of alternatives;
- Develop mitigation measures (including timescale and mechanisms);
- Report outcomes of the HRA including mitigation measures
- Consult with CCW and provide HRA to wider consultees (will be undertaken as part of LDP consultation);
- If the Plan will not adversely affect European site integrity proceed with Plan, but ensure that policies are monitored.

⁴ Technical Advice Note 5: Nature Conservation and Planning (Welsh Assembly Government, September 2009)

Chapter 3: Pembrokeshire County Council Local Development Plan

- 3.1 The Local Development Plan (LDP) sets out the development strategy and policies to guide the development and land use in Pembrokeshire, from adoption to 2021. It provides the policy context for directing development to appropriate locations, conserving the natural, built and historic environment and providing a basis for rational and consistent decision-making on Planning applications. The LDP was screened throughout the Plan preparation process to ensure that any impacts on any of the 19 European sites were identified throughout.
- 3.2 The Plan has developed through consultation with stakeholders to produce LDP strategic policies, general policies and land allocations. These policies and land allocations have been screened to determine the likelihood of any significant effects on European sites. The screening also extends to sites outside the Plan area, where the LDP may have some effect on those sites. The candidate sites assessment process of the LDP was mindful of European sites and sustainability issues through the Sustainability Appraisal process (incorporating Strategic Environmental Assessment)⁵.

TABLE 2: Plan details				
Title of the Plan/programme Pembrokeshire County Co	Pembrokeshire County Council Local Development Plan			
Plan purpose To set the framework fo	To set the framework for development in the County			
What prompted the Plan (e.g. Legislation - Part 6 of the	Legislation - Part 6 of the Planning and Compulsory			
legislative, regulatory or Purchase Act 2004 (The	Purchase Act 2004 (The Act) requires the Council to			
administrative provision)? prepare a Local De	prepare a Local Development Plan (LDP)			
Plan subject (e.g. transport)	Planning			
Period covered by the Plan 201	1 – 2021			
Frequency of Plan updates Review 6	Review every 4 years			
DI .				
Plan area 1,01	1,015 sq kms			
Drief description of the Dlan The Level Dayslandon	at Dian (LDD) will not out the			
	nt Plan (LDP) will set out the			
	ework for the development and Pembrokeshire (excluding the			
	esignation), from adoption to			
	icies and proposals for the			
	development and use of land in Pembrokeshire, and will be used by the Council to guide and control			
	development, providing a basis for the consistent			
	Planning applications			
	June – October 2010			
	Cath Ranson			

⁵ See PCC LDP Candidate Sites Assessment paper http://www.pembrokeshire.gov.uk/content.asp?nav=109%2C141%2C1014&parent_directory_id=646

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3.3 Supplementary Planning Guidance (SPG) has been produced for the Plan on Affordable Housing, Development Sites, and Minerals Resource Buffer Zones. The LDP has been assessed in this HRA Report, the SPG documents elaborate on how the Plan will be implemented, they do not make any changes to the policies. The SPG are therefore unlikely to have a likely significant impact on European sites.

Chapter 4: HRA of LDP

4.1 The Local Development Plan HRA screening identified those European Sites relevant to the Plan area (Table 3). Sites outside the Plan area were also identified, as the Plan could potentially affect these sites. The potential effects of the development Plan are summarised. Other plans and projects were identified to assess the potential impact in-combination with the Local Development Plan. The LDP policies and allocations were screened and the potential effects on European sites identified. There are 19 European sites which are in or close to the Plan area.

TABLE 3: Identification of European sites

Name and designation (EU Code)	Central Grid	Area	Within or close to the Plan area?
(25 5535)	Reference		
Carmarthen Bay and	SS357991	66101.16 ha	Small part of the site
Estuaries SAC (UK0020020)			is in the Plan area
Cardigan Bay SAC	SN214641	95860.36 ha	Part of the site is in /
(UK0012712)			adjoins the Plan area
Pembrokeshire Marine SAC	SM503093	138069.5 ha	Part of the site is in
(UK 0013116)			the Plan area
North West Pembrokeshire	SM776273	248.89 ha	Part of the site is in
Commons SAC (UK0030229)			the Plan area
North Pembrokeshire	SN046345	315.68 ha	Part of the site is in
Woodlands SAC			the Plan area
(UK0030227) Pembrokeshire Bat Sites and	SR966954	122.44 ha	The Orielton next of
Bosherston Lakes SAC	SK900954	122.44 na	The Orielton part of the site is within the
(UK0014793)			Plan area
Preseli SAC (UK0012598)	SN110320	2705.9 ha	Adjoins the boundary
Tresell SAC (UR0012590)	311110320	2705.9 Ha	of the Plan area
Afon Teifi SAC (UK0012670)	SN515508	715.58 ha	Part of the site is in
		1 10100 110	the Plan area
Afonydd Cleddau SAC	SM938249	750.73 ha	Part of the site is in
(UK0030074)			the Plan area
Yerbeston Tops SAC	SN057099	18.81 ha	All of the site is in the
(UK0030305)			Plan area
Carmarthen Bay SPA	SS280971	33411.27 ha	Part of the site is
(UK9014091)			in/adjoins the Plan
	0000000	4504501	area
Limestone Coast of SW	SR885969	1594.53 ha	Outside the Plan area
Wales SAC (UK0014787)	014700005	005 47 5 -	Outside the Discourse
St. David's SAC	SM728285	935.47 ha	Outside the Plan area
(UK0013045)	SN155317	150.11 ha	Outside the Plan area
Gweunydd Blaencleddau SAC (UK0030144)	311133317	130.11118	Outside the Plan area
Castlemartin Coast SPA	SR885999	1122.32 ha	Outside the Plan area
(UK9014061)	011000000	1122.02 110	
Ramsey and St. David's	SM728284	845.63 ha	Outside the Plan area
Peninsula SPA (UK9014062)			

Grassholm SPA	SM598092	10.73 ha	Outside the Plan area
(UK9014041)			
Skomer and Skokholm SPA	SM728092	427.71 ha	Outside the Plan area
(UK9014051)			
Carmarthen Bay Dunes SAC	SN285074	1206.32 ha	Outside the Plan area
(UK0020019)			

4.2 The management plans for all SACs and SPAs includes the features and conservation objectives for each of the sites and are available on the CCW website⁶. Further information is also available on the JNCC website⁷. A full review of baseline data, which includes environmental data incorporating information on European sites, is included in the Sustainability Appraisal Report which is available separately⁸.

Effects on European sites

4.3 The HRA screening needs to take into account any likely direct, indirect, or secondary impacts of the Plan on each feature of the each European site in view of the sites conservation objectives. The conservation objectives for each site have been assessed based on the potential effects from the LDP. There are many management issues at SACs and SPAs which are unrelated and unlikely to be influenced by the LDP.

Potential effects from the Local Development Plan

4.4 The possible effects from the Local Development Plan are listed below. This list is not exhaustive, therefore there may be other effects not identified here, however every effort has been made to ensure all likely impacts have been addressed. Effects from the Plan can be direct, indirect or secondary impacts (alone or in combination with other projects or plans).

4.5 Potential effects from the LDP:

- Loss of habitat or fragmentation of habitat through development.
- Disturbance of species.
- Loss of feeding area.
- Changes in water chemistry, water quality issues (e.g increased loading on rivers WWTW, STW, other sewerage infrastructure).
- Water quantity issues drainage, abstractions, impacts on sites with hydrological links.
- Flooding surface water, flood risk management, coastal defences.
- Industrial activity (e.g. energy generation, economic development, employment land allocations), infrastructure associated with industrial activity (e.g. new infrastructure linking to offshore energy developments).
- Effects during different stages of development construction, operation, decommissioning etc.
- Pollution, including air quality, from industrial processes, traffic, run-off from roads.

id=646

8 http://www.pembrokeshire.gov.uk/content.asp?nav=109%2C141%2C1014&parent_directory

⁶ http://www.ccw.gov.uk/landscape--wildlife/protecting-our-landscape/special-sites-project.aspx

http://www.jncc.gov.uk/page-4

- Road development, increased traffic.
- Recreation increase in visitors, disturbance, pollution, litter.
- Impacts from waste developments.
- Impacts from development of minerals sites aggregates (sand and gravel), quarries.

4.6 The effects of climate change are also likely to impact on European sites for example through flooding, changes in temperature and seal level and indirectly through flood defence works. This was taken into account throughout the HRA process.

In-combination effects

4.7 The LDP may have a significant effect in combination with other Plans, programmes or projects. Other Plans which may give rise to in-combination effects include:

- Wales Spatial Plan
- Regional Transport Plan
- Regional Waste Plan
- Pembrokeshire Coast National Park LDP and Management Plan
- Milford Haven Port Authority Plans
- Carmarthenshire County Council LDP
- Ceredigion County Council LDP
- Regional Technical Statement for South Wales Regional Aggregates Working Party
- Utilities Plans or projects, including Dwr Cymru Welsh Water
- Environment Agency Plans
- Shoreline Management plans
- Infrastructure Planning Commission and resulting national policy statements (nationally significant infrastructure projects such as energy, oil and gas infrastructure, national networks, airports).
- TAN 8 Renewable energy.
- 4.8 A full review of other plans and projects was undertaken as part of the Sustainability Appraisal Report (incorporating Strategic Environmental Assessment) and updated as the Plan process progressed. This is available as a separate report⁹.
- 4.9 The LDP has had regard to in-combination effects at every stage of production. There are other developments which could potentially have incombination effects. These plans, projects and proposals include Joint Unitary Development Plan (JUDP) allocations, consented projects, schemes submitted for planning permission but currently without consent, proposals at pre-application/feasibility assessment stage. Guidance states that the Habitats Regulations Appraisal take account of these types of plans, projects and proposals when determining the likely significant effect on European

⁹http://www.pembrokeshire.gov.uk/content.asp?nav=109,141,1014&parent_directory_id=646 &id=13440

sites. This list of potential plans, projects and proposals has been considered and assessed, however a cut off date is necessary for the consideration of these plans. This position is therefore taken at August 2010.

4.10 Note that in-combination tests cannot reasonably be expected to include the possible effects of projects not yet applied for or Plans (or draft Plans) not yet published for consultation. This means that the first draft of the Plan is not subject to as many in-combination tests, because alone it would not have significant effects. It is the second and subsequent plans or projects that will need in-combination checks with the first and any other earlier plans. Therefore in-combination tests included those potential developments which were nearing or at application or consultation stage.

- 4.11 Other potential future developments have been considered and none of these are likely to have a significant effect on European sites alone or in combination.
- 4.12 The results of the Review of Consents (RoC) process for Pembrokeshire County Council, other authorities, particularly the Environment Agency and neighbouring authorities could also have implications for the LDP and this will be considered throughout the PCC RoC where appropriate.

Screening of the LDP

- 4.13 The screening for likely significant effects of the LDP has been carried out using an approach which reviews policies and allocated sites and potential effects (see Appendices 1 and 2), and also at the European sites with reference to the management plans for the sites along with the potential effects of the LDP (Appendix 3).
- 4.14 The policies of the LDP have been screened against criteria which look at the intended outcomes of the policies, this aids the decision as to whether the policies may have likely significant effect on European sites.

Strategic policy screening

- 4.15 Those strategic policies most likely to impact on European sites were identified as:
- SP 2 Port and Energy Related Development
- SP 3 Employment Land Requirements
- SP 5 Visitor Economy
- SP 7 Housing Requirement.

Screening of general policies

- 4.16 The 41 general policies of the LDP were screened to determine potential impacts on European sites. Eight policies were identified:
- **GN 5 Employment Allocations**
- **GN 7 Mixed-Use Allocations**
- **GN 14 Retail Allocations**
- GN 16 Visitor Attractions and Leisure Facilities
- **GN 22 Marinas**

GN 28 Residential Allocations GN 38 Transport Routes and Improvements GN 39 New Waste Management Facilities

Screening of allocated sites

4.17 The 149 allocated sites have been screened for likely significant effects on European sites. This looks at the proximity to the SACs and SPAs and also at the nature and scale of the development and the likelihood of any effects. Undertaking a precautionary approach, there were 31 sites which had an element of uncertainty of effects.

Cross reference of potential effects on SACs and SPAs

4.18 The 19 European sites were screened to determine whether they would be potentially affected by the LDP (Appendix 3). This was carried out by identifying the vulnerabilities of each European sites from the SAC/SPA Management plans (using the versions available at the time from the CCW website 10) and screening these against the LDP policies and allocations. Allocated sites were also screened against Phase 1 habitat information.

Summary

- 4.19 The policies and land allocations were assessed for their likely significant impact on European sites. Those policies and sites which were screened out completely have been done so due to the proximity to SACs and SPAs, the nature and scale of development, or due to them being general policy statements.
- 4.20 Policies with some indication of potential effects on European sites were identified and as a result mitigation was explored to ensure that these potential effects were eliminated.
- 4.21 The land allocations where likely significant effects were uncertain were subject to further assessment. Mitigation was proposed to address these issues in Chapter 6.

¹⁰ http://www.ccw.gov.uk/landscape--wildlife/protecting-our-landscape/special-sites-project-landing.aspx

Chapter 5: Mitigation

- 5.1 Guidance on HRA specifies that: measures to avoid, cancel or reduce the effects of a plan on a European site (here referred to as avoidance measures, cancellation measures and reduction measures respectively) should be proposed as part of the plan and the plan making authority will take these into account in the appraisal, often collectively referred to as 'mitigation measures'¹¹.
- 5.2 Mitigation of the likely significant effects of the Plan has been undertaken through the strengthening of policies to ensure that there are no impacts on European sites.
- 5.3 Appendix 4 provides a summary of the changes made to policies to address these uncertainties. The main issues relating to policies and allocated sites were in relation to the strength of the biodiversity policies, water quality and water quantity, surface water drainage and infrastructure issues.
- 5.4 The Plan includes policies which require development to incorporate sustainable drainage systems, water conservation measures, robust policies in terms of biodiversity and European sites, and the development of SPG.
- 5.5 Supplementary Planning Guidance (SPG) on Development Sites ¹² has been produced as part of the LDP to provide information on all development sites. This addresses waste water treatment, sewerage, water features, surface water, transport, and any other specifics for example provisions of open space, phasing, Dwr Cymru Welsh Water Asset Management Programme, site specific items such as housing density. The SPG also references protected species and states that the impact on protected species should be minimised and mitigated this is a consideration for all development sites in the LDP.
- 5.6 For those policies in the Plan which will result in development occurring at unspecified locations. Where the location of development is not known a project level assessment will be undertaken as part of the planning application assessment, prior to determination.

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¹¹ The Appraisal of Plans under the Habitats Directive, Draft guidance, CCW, Nov 2009 (revised April 2010).

² www.pembrokeshire.gov.uk/planning

Chapter 6: Conclusions and next steps

- 6.1 Screening of the LDP for likely significant effects on European sites demonstrated that the LDP is unlikely to have a likely significant effect on SACs or SPAs due to the mitigation measures developed during preparation of the Plan.
- 6.2 The HRA process has enabled policies to be changed ensuring that no likely significant effects will take place when the plan is implemented.
- 6.3 While not a direct requirement of the Habitats Regulations Appraisal, protected species have been considered within the Plan process (and as part of the Sustainability Appraisal incorporating SEA). As a result, a Development Sites SPG now highlights protected species issues where necessary and the Biodiversity Policy has been strengthened (GN 36). This allows for greater protection to the biodiversity resource as a whole across the Plan area.
- 6.4 This HRA Screening of the LDP is subject to consultation with the statutory consultee Countryside Council for Wales, and as part of a wider consultation in conjunction with the LDP and its accompanying Sustainability Appraisal (incorporating Strategic Environmental Assessment). Following this consultation this report may be revised, with changes well documented.
- 6.5 Where adverse effects of the Plan policies can be mitigated, this will ensure no likely significant effects on European sites. The Plan includes mechanisms for avoiding or mitigating any likely significant effects. The Plan will be monitored for any unforeseen likely significant effects which might arise when the Plan is implemented. The monitoring framework of the Plan includes a monitoring outcome to:

Ensure development does not compromise the favourable conservation status of species and habitats of European importance (outcome 19) (LDP, Figure 2, page 26 and 84).

6.6 The Plan will be subject to annual monitoring and reviewed as a minimum every four years, with intervening partial reviews possible if annual monitoring indicates a requirement.

Commenting on this report

6.7 This report will be subject to consultation from 26 January 2011 to 5.00 p.m. on 9 March 2011. Please comment on this HRA Report using the response form in Appendix 5 of this report.