



Stockport Metropolitan Borough Council

LOCAL PLAN 2026 - 2041

Habitats Regulations Assessment (Regulation 18)





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LOCAL PLAN HABITATS REGULATIONS ASSESSMENT (HRA) SUPPORTING INFORMATION FOR REGULATION 18 CONSULTATION – STAGE 1 SCREENING

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EXECUTIVE SUMMARY

WSP UK Ltd. ('WSP') were instructed by Stockport Metropolitan Borough Council to provide information to support a Habitats Regulations Assessment (HRA) Stage 1 (Screening) in relation to the Regulation 18 stage of preparation of a new Local Plan, period 2026 – 2041. WSP's scope is to assess those impacts from the Local Plan provisions relating to ecology and air quality only.

The Local Plan outlines key development priorities for the strategic period, including:

- Provision for 31,000 new homes, distributed across designated site allocations.
- Delivery of 87,000m² of employment space.
- Policies guiding the geographical focus of development.
- Broadly supportive policies for development or change, without specifying exact locations or quantities.

Under the requirements of the Conservation of Habitats and Species Regulations 2017 (as amended) (the 'Habitats Regulations')[1] (His Majesty's Stationery Office (HMSO), 2017), it is necessary to consider whether projects or plans have the potential to result in significant effects upon protected sites for nature conservation importance designated under The Habitats Regulations. The Habitats Regulations place a duty upon 'Competent Authorities' to consider the potential for effects upon such sites before granting consent for projects or plans (known as Habitats Regulations Assessment). This document has been prepared to inform Stage 1 (Screening).

Five designated sites located within 15km (and 10.7km for air quality) of the Proposed Development, which require consideration under The Habitats Regulations, have been identified, with locations in respect of the nearest SMBC boundary (**Figure 1**):

- South Pennine Moors SAC, 2.75km east.
- Peak District Moors (South Pennine Moors Phase 1) SPA, 2.75km east.
- Rochdale Canal SAC, 5.6km north.
- Rostherne Mere Ramsar, 8.8km southwest.
- Midland Meres & Mosses - Phase 1 Ramsar, 9.4km southwest.

A further site, Manchester Mosses SAC, has been included following consultation with Natural England in relation to air quality impacts.

Whilst the Local Plan contains policies to conserve and maintain protected sites, these are not directly connected to or necessary for the management of these international sites but are considered as incorporated mitigation, where appropriate. The HRA Screening concludes that with the implementation of incorporated mitigation, there are no potential impact pathways identified which may result in significant effects to the qualifying features of Midland Meres & Mosses (Phase 1) Ramsar. Likely significant effects through recreational pressure and air quality cannot be discounted for Manchester Mosses SAC, Rochdale Canal SAC, Peak District Moors (South Pennine



Moors Phase 1) SPA, South Pennine Moors SAC, and Rostherne Mere Ramsar. As a result, these five international sites are required to be taken through to Stage 2 Appropriate Assessment and subsequent integrity test.

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1 INTRODUCTION

1.1 OVERVIEW

1.1.1. This HRA Stage 1 screening has been prepared by WSP UK Ltd ('WSP') on behalf of Stockport Metropolitan Borough Council (the 'Client'). The report has been produced concerning Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended) (the 'Habitats Regulations')¹ (His Majesty's Stationery Office (HMSO), 2017). The purpose of this Habitats Regulations Assessment (HRA) is to assess if the proposals in the Local Plan are likely to result in significant effects on European and International designated sites identified within the zone of influence ((Zol) defined in 3.2).

1.2 PROJECT BACKGROUND

1.2.1. The current Stockport Metropolitan Borough Council (SMBC) Core Strategy DPD 2011 sets out the planning policies for Stockport to 2026, in conjunction with policies saved from the Stockport Unitary Development Plan (UDP, May 2006). SMBC has provided further guidance in the Stockport Local Development Scheme (LDS, September 2025), Greater Manchester Joint Plans and Supplementary Planning Documents (SPDs) and Supplementary Planning Guidance (SPG). SMBC is currently reviewing the Local Plan to cover the planning period to 2041, and to combine the existing plans, schemes, policies and guidance into a single Local Plan.

1.2.2. The draft Preferred Options Local Plan (Schedule 18), informed by this HRA, sets out the strategic vision, objectives and spatial strategy for the borough, as well as the planning policies which will help to determine the future location, scale, type and design of new development in Stockport.

1.2.3. The current planning policies and supporting documents are available at <https://www.stockport.gov.uk/topic/current-planning-policies>. In broad terms, the draft Local Plan includes:

- Provision for 31,000 homes over the plan period (the quantum of growth), across allocated residential sites.
- Provision of a combined 87,000m² of employment space, over two allocated employment sites.
- Policies providing geographical direction for development (typically specific housing and minerals site allocations, but also implicit location preferences for certain activities or sectors prescribed through (for example) areas of search);
- Policies broadly supporting development or other changes, but which do not specify a quantum or location;
- Various development control policies that set out SMBC's tests or expectations when considering proposals, such as safeguarding policies, environmental protection policies or policies relating to design or other qualitative criteria.

¹ As updated by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019.



- 1.2.4. These aspects could affect International sites on their own, through typical development-related mechanisms operating at the local scale in relation to specific allocations (e.g. noise, lighting, etc.; see **Table 4-1** below) or collectively by exacerbating regional pressures (e.g. pressures on water supply or sewerage treatment).
- 1.2.5. As part of the plan development, several sites which were previously considered for site allocation have now been discounted. These sites are not considered within this HRA Screening.

2 HABITATS REGULATIONS ASSESSMENT PROCEDURE

2.1 HABITATS REGULATIONS ASSESSMENT

- 2.1.1. This report provides information to enable the HRA Stage 1: Screening of the Draft Plan. This is to assist the Council, in its capacity as a Competent Authority², in establishing whether the Draft Local Plan would have any Likely Significant Effects (LSEs) upon internationally designated sites.
- 2.1.2. Section 2 sets out the applicable methods and assumptions for the assessment of the Proposed Works with regards to the requirements of the Habitats Regulations.

Habitats Regulations

- 2.1.3. Under The Habitats Regulations, ‘Competent Authorities’ are required to assess plans or projects for their potential to cause LSE³ on internationally important nature conservation sites (SACs, SPAs, and Ramsar sites). Where the plan or project may lead to LSE it must be subject to an Appropriate Assessment (AA) to determine whether there will be adverse effects on any international sites. Any plan or project that would lead to adverse effects on the integrity of international sites(s) cannot be permitted without meeting strict additional tests.
- 2.1.4. Regulation 63 (1) of The Habitats Regulations⁴ states that:
‘...a Competent Authority, before deciding to undertake, or give any consent, permission or other authorisation for, a plan or project which—
(a) is likely to have a significant effect on an international site or a European offshore marine site (either alone or in combination with other plans or projects), and
(b) is not directly connected with or necessary to the management of that site,
—must make an appropriate assessment of the implications for that site in view of that site’s conservation objectives.’
- 2.1.5. If LSE’s on the integrity of the site and its qualifying features are predicted, measures to mitigate for these effects will be implemented. If it is not possible to mitigate satisfactorily for adverse effects, the development will not be permitted, and alternative solutions must be considered (**Stage 3 Assessment of Alternative Solutions**). If there is no alternative solution, The Habitats Regulations make allowance for plans or projects to be considered, despite a potentially negative effect on site integrity if they satisfy ‘imperative reasons of overriding public interest’ (**Stage 4 IROPI**). Regulation 64⁵ relates to such situations.
- 2.1.6. The Competent Authority must include consideration of ‘in-combination’ effects arising from other plans and projects within their assessment, as well as those potentially acting alone.

² Under The Habitats Regulations, ‘Competent Authorities’ are required to assess plans or projects for their potential to cause Likely Significant Effects (LSE) on International sites. Where the plan or project may lead to LSE, it must be subject to an Appropriate Assessment (AA) to determine whether there will be adverse effects on any Habitats sites. Any plan or project that would lead to adverse effects on the integrity of International sites cannot be permitted without meeting strict additional tests.

³ A likely significant effect is defined as any identified effect that could result in a change in the conservation status of one or more features for which a Habitats Site is designated after all aspects of the project/plan have been considered alone and in combination with other projects/plans.

⁴ Regulation 63 of the Habitats Regulations. Available at: <https://www.legislation.gov.uk/ukksi/2017/1012/regulation/63/made>.

⁵ Regulation 64 of the Habitats Regulations. Available at: <https://www.legislation.gov.uk/ukksi/2017/1012/regulation/64/made>.

Conservation Of Habitats And Species Regulations 2017

- 2.1.7. As part of the UK's withdrawal from the European Union, the Conservation of Habitats and Species Regulations 2017 (as amended) has been created which consolidates the Conservation of Habitats and Species Regulations 2010 with subsequent amendments. The Regulations transpose Council Directive 92/43/EEC⁶, on the conservation of natural habitats and of wild fauna and flora (EC Habitats Directive), into national law. They also transpose elements of the EU Wild Birds Directive in England and Wales.
- 2.1.8. Defra guidance (2021)⁷ states that SACs and SPAs in the UK no longer form part of the EU's Natura 2000 ecological network^{8&9}. The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 recognise the network of SACs, SPAs and European Marine sites as national site network on land and at sea, including both the inshore and offshore marine areas in the UK. The national site network includes:
- Existing SACs and SPAs; and
 - New SACs and SPAs designated under these Regulations.
- 2.1.9. European sites are internationally important habitats designated under the EU Habitats Directive and Birds Directive, while "international sites" is a broader, more general term that includes European sites as well as other designations, such as Ramsar sites. After Brexit, "European site" is still used in the UK to refer to these sites, but the term "international sites" has been introduced to reflect a new network structure. As such, the included SAC, SPA and Ramsar sites will be referred to within this document as international sites.
- 2.1.10. Maintaining a coherent network of protected sites with overarching conservation objectives is still required in order to:
- Fulfil the commitment made by the Government to maintain environmental protections; and
 - Continue to meet our international legal obligations, such as the Bern Convention, the Oslo and Paris Conventions (OSPAR), Bonn and Ramsar Conventions.
- 2.1.11. The use of the term Favourable Conservation Status (FCS) is not amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019, and the term still has the meaning

⁶ The 'Habitats Directive' (Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora) protects habitats and species of European Sites. Together with the 'Birds Directive' (Council Directive 2009/147/EC on the Conservation of Wild Birds), the Habitats Directive establishes a network of internationally important sites designated for their ecological status. The Habitats Directive was transposed into British law through the Habitats Regulations.

⁷ Department for Environment Food and Rural Affairs (2021). Changes to the Habitats Regulations 2017. Available at: <https://www.gov.uk/government/publications/changes-to-the-habitats-regulations-2017/changes-to-the-habitats-regulations-2017>.

⁸ The Habitats sites noted in the text combined to create a Europe-wide 'Natura 2000' network of Habitats sites under the EU Habitats Directive.

⁹ As noted, the 2019 amendment to the Habitats Regulations largely carried forward the provisions and terminology of the 2017 Regulations, and so the term 'European site' is currently retained and for all practical purposes the definition is essentially unchanged. European sites are therefore: any Special Area of Conservation (SAC) from the point at which the European Commission and the UK Government agreed the site as a 'Site of Community Importance' (SCI) (if this was before 31 Jan 2020); any classified Special Protection Area (SPA); and any candidate SAC (cSAC). However, the term is also commonly used when referring to potential SPAs (pSPAs), to which the provisions of Article 4(4) of Directive 2009/147/EC (the 'new wild birds directive') are applied; and to possible SACs (pSACs) and listed Ramsar Sites, to which the provisions of the Habitats Regulations are applied a matter of Government policy (NPPF para. 187) when considering development proposals that may affect them. "European site" is therefore used in this document in its broadest sense, as an umbrella term for all of the above designated sites. Note, it is likely that this term will be supplanted at some point in the future although an appropriate UK-wide alternative has not yet been established (e.g. the NPPF in England has adopted the term 'Habitats sites' to refer collectively to those sites defined by Regulation 8; the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 replaces 'Natura 2000' with the 'National Site Network').

given by Article 1 of the Habitats Directive. Defra (2021)⁵ does however note that “an appropriate authority is only responsible for managing and adapting the national site network to secure FCS of a feature proportionately to the importance of the UK within the feature’s natural range”. The Habitats Directive provides further interpretation of the meaning of ‘favourable conservation status’ within Article 1 parts (a), (e) and (i) as below:

‘(a) conservation means a series of measures required to maintain or restore the natural habitats and the populations of species of wild fauna and flora at a favourable status as defined in (e) and (i);.....

(e) conservation status of a natural habitat means the sum of the influences acting on a natural habitat and its typical species that may affect its long-term natural distribution, structure and functions as well as the long-term survival of its typical species within the territory referred to in Article 2. The conservation status of a natural habitat will be taken as "favourable" when:

- *Its natural range and areas it covers within that range are stable or increasing, and*
- *The specific structure and functions which are necessary for its long-term maintenance exist and are likely to continue to exist for the foreseeable future, and*
- *The conservation status of its typical species is favourable as defined in (i);*

(i) conservation status of a species means the sum of the influences acting on the species concerned that may affect the long-term distribution and abundance of its populations within the territory referred to in Article 2; The conservation status will be taken as "favourable" when:

- *Population dynamics data on the species concerned indicate that it is maintaining itself on a long-term basis as a viable component of its natural habitats, and*
- *The natural range of the species is neither being reduced nor is likely to be reduced for the foreseeable future, and*
- *there is, and will probably continue to be, a sufficiently large habitat to maintain its populations on a long-term basis’.*

2.1.12. As the general provisions for the protection of international sites and the procedural requirements to undertake HRA to assess the implications of plans or projects for international sites remain, previous case law established before the UK's exit from the EU is considered to apply unless superseded by the judgment of an appropriate UK court.

2.1.13. Many SPAs and Ramsar sites are largely coincident, both spatially and in terms of features; within this document, SPA and Ramsar site names may therefore sometimes be combined with the suffix “SPA/Ramsar” for simplicity where this is not material to the assessment of specific sites or features.

2.1.14.

National Planning Policy Framework 2024 (NPPF)

2.1.15. The NPPF sets out the Government’s planning policies for England and how these should be applied. It provides a framework within which locally prepared plans and other development can be produced. The NPPF must be considered in the preparation of the Local Plan and is a material consideration in planning decisions. Its policies guide the delivery of sustainable development, ensuring that the Local Plan contributes to meeting national priorities in a locally responsive manner.

2.1.16. The NPPF (under paragraph 192) states that when considering the conservation and enhancement of the natural environment, with regard to habitats and biodiversity, the Local Planning Authority should:

- a. *'Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and*
- b. *promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.'*

2.1.17. In addition, the NPPF states the following with regard to designated sites:

'(194) The following should be given the same protection as international sites:

- a. *potential Special Protection Areas and possible Special Areas of Conservation;*
- b. *listed or proposed Ramsar sites; and*
- c. *sites identified, or required, as compensatory measures for adverse effects on International sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.*

(195) The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on an international site(s) (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the international sites.'

RELEVANT AIR QUALITY GUIDANCE

Natural England's Internal Guidance

2.1.18. In June 2018, Natural England (NE) published guidance¹⁰ on their approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations. The document draws upon Annex F of the National Highways (formerly known as Highways England) Design Manual for Roads and Bridges (DMRB)¹¹ (now withdrawn) but takes into account the Wealden Judgement¹² and need to assess 'in combination' effects on International sites as a result of air pollution.

2.1.19. The guidance provides a framework for the assessment of road traffic emissions and subsequent effects on international sites. Notably:

- Step 1 – Does the proposal give rise to emissions which are likely to reach an international site?

¹⁰ Natural England (June 2018) Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations. Available online: <http://publications.naturalengland.org.uk/publication/4720542048845824>

¹¹ Highways England (2019) Design Manual for Roads and Bridges, LA105 – Air Quality. Available at: <https://www.standardsforhighways.co.uk/tse/attachments/10191621-07df-44a3-892e-c1d5c7a28d90?inline=true>.

1 ¹² Wealden District Council v Secretary of State for Communities and Local Government, Lewes District Council and South Downs National Park Authority [2017] EWHC 351 (Admin)

- Step 2 – Are there qualifying features within 200m of a road sensitive to air pollution?
- Step 3 – Could the sensitive qualifying features of the site be exposed to emissions(?), and
- Step 4 – Application of the Screening Thresholds.
 - Step 4a: apply the threshold alone.
 - Step 4b: apply the threshold in combination with emissions from other road traffic plans and projects; and
 - Step 4c: apply the threshold in combination with emissions from other non-road plans and projects.
- Step 5: Advise on the need for Appropriate Assessment where thresholds are exceeded, either alone or in combination.

2.1.20. The relevant thresholds in relation to Step 4 are as follows:

- Changes in Annual Average Daily Traffic (AADT) of 1,000 vehicles a day (or more); and/or
- Changes of 1% of the relevant Critical Load and/or Critical Level as a result of the Plan/Project.

IAQM's Guide To The Assessment Of Air Quality Impacts On Designated Nature Conservation Sites

2.1.21. The Guide to the Assessment of Air Quality Impacts on Designated Nature Conservation Sites¹³ provides advice for ecologists relating to air quality assessments (AQAs), to evaluate the effects of air pollution on habitats and species, by increasing their understanding of the information provided by air quality specialists. The Guide focuses on the AQA process and provides no specific detail on the subsequent stage of the overall process, i.e. the assessment of the effects that air quality impacts may have on habitats and species, is provided in this guidance.

CIEEM Advisory Note: Ecological Assessment Of Air Quality Impacts

2.1.22. This guidance from the Chartered Institute of Ecology and Environmental Management (CIEEM)¹⁴ is intended to guide ecologists (and air quality specialists) through the issues they should consider making an informed judgment about the ecological effects of changes in pollution concentrations and deposition rates. The approach set out builds on the advice and guidance from Natural England and the IAQM but focuses on the role of the ecologist to interpret the numerical output of air quality assessments to reach evidence-based conclusions on ecological significance.

2.1.23. The guidance highlights the implications on vehicle emissions, increasing the airborne concentration of nitrogen oxides (NO_x) and therefore the subsequent rate of nitrogen deposition. Nitrogen deposition can lead to nutrient enrichment of a variety of habitats, limiting the growth, abundance and distribution of certain plants whilst encouraging the growth of others. This can lead to changes in the structure and function of qualifying habitats, which in turn can impact some features of interest.

¹³ Holman et al (2020). *A guide to the assessment of air quality impacts on designated nature conservation sites – v1.1* Available online: <https://iaqm.co.uk/text/guidance/air-quality-impacts-on-nature-sites-2020.pdf>

¹⁴ CIEEM (January 2021) *Advisory Note: Ecological Assessment of Air Quality Impacts*. Available online: <https://cieem.net/resource/advisory-note-ecological-assessment-of-air-quality-impacts/#:~:text=Advisory%20Note%3A%20Ecological%20Assessment%20of%20Air%20Quality%20Impacts,.of%20changes%20in%20pollution%20concentrations%20and%20deposition%20rates>

BACKGROUND TRENDS

National policy initiatives are expected to contribute to improvements in air quality over the Local Plan period. The UK Air Quality Plan for Nitrogen Dioxide¹⁵ is anticipated to result in a substantial reduction in NOx emissions from vehicles, supported by the Department for Transport's initiative to phase out the sale of new petrol and diesel cars by 2030 and inclusive of vans by 2035¹⁶. This transition to zero-emission transport is expected to lead to a corresponding decrease in background nitrogen deposition rates. Incorporating allowances for expected background air quality improvements into assessments is supported by the Institute of Air Quality Management (IAQM) guidance (2020). Policy and guidance related to the protection of international sites and HRA can be found in Appendix A.

2.2 STAGES OF HABITATS REGULATIONS ASSESSMENT

- 2.2.1. Guidance on The Habitats Directive (European Commission, 2000) sets out the step-wise approach which should be followed to enable Competent Authorities to discharge their duties under the Habitats Directive and provides further clarity on the interpretation of Articles 6(3) and 6(4). The process used is usually summarised in four distinct stages of assessment.
- 2.2.2. As set out in Regulation 3 of The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019, where Natura 2000 sites are referenced in previously issued guidance, this should be interpreted as relating to the national site network but does not otherwise affect guidance as it applied before EU exit day.
- **Stage 1: Screening:** the process which identifies whether effects upon international site(s) by a plan or project are possible, either alone or in combination with other plans or projects and considers whether these effects are likely to be significant.
 - **Stage 2: Appropriate Assessment:** the detailed consideration of the effect on the integrity of the international site(s) by the plan or project, either alone or in combination with other plans or projects, with respect to the site's conservation objectives and its structure and function.
 - **Stage 3: Assessment of alternative solutions:** the process which examines alternative ways of achieving the objectives of the plan or project that avoid adverse effects on the integrity of the international site(s).
 - **Stage 4: Assessment where no alternative solutions exist and where adverse effects remain:** an assessment of whether the development is necessary for Imperative Reasons of Overriding Public Interest and, if so, of the compensatory measures needed to maintain the overall coherence of the national site network.
- 2.2.3. It should be noted that this process, as set out in the EC Guidance (2000), is expanded upon in England and Wales by guidance from the UK Government¹⁷ to include Stages 1 and 2, but later stages are incorporated into the process known as 'derogation'. Should consideration of a proposal need to progress beyond a failure of the integrity test, this derogation process requires consideration,

¹⁵ Air quality plan for nitrogen dioxide (NO₂) in UK (2017): <https://www.gov.uk/government/publications/air-quality-plan-for-nitrogen-dioxide-no2-in-uk-2017>

¹⁶ Department for Transport (2024) *Phasing out the sale of new petrol and diesel cars from 2030 and Support for Zero Emission Transition*. Available at <https://www.gov.uk/government/speeches/phasing-out-the-sale-of-new-petrol-and-diesel-cars-from-2030-and-support-for-zero-emission-vehicle-zev-transition>

¹⁷ <https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site#screening>

notification to the Secretary of State for the relevant UK government department or Welsh Government and the passing of three legal tests:

- There are no feasible alternative solutions that would be less damaging or avoid damage to the international site(s).
- The proposal needs to be carried out for imperative reasons of overriding public interest.
- The necessary compensatory measures can be secured.

2.2.4. This report presents information to enable the screening assessment required as part of Stage 1 of the HRA process.

2.2.5. The precautionary principle is applied at all stages of the HRA process. In relation to screening, this means that plans or projects where effects are considered likely and those where uncertainty exists as to whether effects are likely to be significant must be subject to the second stage of the HRA process, Appropriate Assessment. Furthermore, mitigation and avoidance measures are not considered during Stage 1, instead, they form part of the Stage 2 process, should this be required. This is in line with the ‘Sweetman ruling’ in the case of *People Over Wind and Peter Sweetman v Coillte Teoranta*, April 2018, the European Court of Justice issued a judgment¹⁸ that clarifies the stage in a Habitats Regulations Appraisal (HRA) process when mitigation measures can be taken into account when assessing impacts on a European site.

2.3 IN-COMBINATION ASSESSMENT

2.3.1. It is a requirement of The Habitats Regulations to consider the effects of plans or projects ‘in combination’ at the screening stage. Regulation 24, 63 and 105 of The Habitats Regulations require competent authorities, in consultation with Natural England, to consider the effects of plans or projects alone and in combination with other plans or projects. The ‘in combination’ requirement is undertaken in order to make sure that prior to their authorisation, the effects of numerous proposals, which alone would not result in a significant effect, are further assessed to determine whether their combined effect would be significant enough to require more detailed assessment.

2.3.2. The landmark Waddenzee judgment provides a clear interpretation of the legislation. Paragraphs 53 and 54 of the Judgment state:

“according to the wording of that provision [Article 6(3) of the Habitats Directive] an appropriate assessment of the implications for the site concerned of the plan or project must precede its approval and take into account the cumulative effects which result from the combination of the plan or project with other plans or projects in view of the site’s conservation objectives. Such an assessment therefore implies that all the aspects of the plan or project which can, individually or in combination with other plans or projects, affect those objectives must be identified in the light of the best scientific knowledge in the field.”

2.3.3. **Table 2-1** outlines the types of plans and projects that should be considered in an in-combination assessment:

Table 2-1 – Types of plans and projects considered at “In-combination” assessment

¹⁸ Judgment of the Court (Second Chamber) of 25 April 2024. *Peter Sweetman v An Bord Pleanála and Ireland and the Attorney General*. Available at <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:62022CJ0301>

- The incomplete or non-implemented parts of plans or projects that have already commenced.
- Plans or projects given consent or given effect but not yet started.
- Plans or projects currently subject to an application for consent or proposed to be given effect.
- Projects that are the subject of an outstanding appeal.
- Ongoing plans or projects that are the subject of regular review.
- Any draft plans being prepared by any public body.
- Any proposed plans or projects published for consultation prior to application.
- Projects being proposed or being undertaken by a competent authority itself, which require no external authorisation.

2.3.4. Based on this complexity and need for consistency in the assumptions relating to mitigation, a precautionary approach should be adopted when considering the HRA conclusions of overlapping plans and projects in combination.

3 LOCAL PLAN HABITATS REGULATIONS ASSESSMENT EVOLUTION

- 3.1.1. The HRA reporting aligns more closely with the guideline stages as the Local Plan develops, with the Preferred Options typically being accompanied by a 'Draft Local Plan HRA' report that includes a detailed 'screening' of the Preferred Options Draft Plan, setting out the HRA-related evidence and the anticipated conclusion (if the plan were to be adopted as drafted, recognising that the HRA can only be completed for the final, adopted plan). This report would then be updated for subsequent consultation stages to reflect consultation responses and plan amendments.

3.2 ZONE OF INFLUENCE

- 3.2.1. The zone of influence of a Local Plan varies according to the aspect being considered (for example, noise effects would rarely extend more than a few hundred metres from the source), and so it is not usually appropriate to employ 'arbitrary' spatial buffers to determine those International sites that should be considered within an HRA.
- 3.2.2. However, as distance is a strong determinant of the scale and likelihood of most effects, the considered use of a suitably precautionary search area as a starting point for the assessment (based on an understanding of both the likely plan outcomes and International site qualifying features) has some important advantages. Using buffers allows the systematic identification of International sites using GIS, so minimising the risk of sites or features being overlooked and ensuring that sites for which there are no reasonable impact pathways can be quickly and transparently excluded from any further screening or assessment. It also has the significant advantage of providing a consistent point of reference for consultees following the assessment process, allowing the screening to focus on the potential effects, rather than on explaining why certain sites may or may not have been considered in relation to a particular aspect of the plan.
- 3.2.3. Most Local Plan HRAs adopt a 15 – 20km buffer for the identification of International sites that may be exposed to significant effects, with sites beyond this distance considered as required. The HRA of this plan, therefore, considers:
- All international sites within 15km of the Council's administrative area, redefined to 10.7km for air quality (see **Table 5-1**)
 - Any additional sites that may be hydrologically linked to the Local Plan's zone of influence; and
 - Any additional sites identified by Natural England following the SA Scoping Consultation (particularly in relation to air quality, see 5.1).
- 3.2.4. This is considered to be a suitably precautionary starting point for the assessment of the Local Plan. Note, at the screening stage, the assessment essentially assumes that there will be 'no likely significant effect' on International sites not included within the scope, both alone and in combination with other plans and projects.

3.3 AIR QUALITY

- 3.3.1. The proposed allocations associated with the Local Plan are housing and employment sites. As a result, the most significant pollutants with regard to air quality impacts on habitats and species are nitrogen oxides (NO_x) and ammonia (NH₃), with NO_x and NH₃ contributions to nitrogen deposition (N

dep). These pollutants are deposited through wet or dry deposition and can pose long-term risks to ecological health. Since the Local Plan will not introduce any new combustion point source emissions to the area, it is unlikely that SO₂ emissions will cause significant effects at international sites. Thus, SO₂ emissions are not considered further at this stage of the assessment. Therefore, this section outlines the methodology for screening International sites that are likely to be affected by the proposed allocations.

HABITAT REGULATION ASSESSMENT APPROACH (FOR AIR QUALITY)

3.3.2. The air quality assessment approach to the HRA screening was developed in consultation with Natural England and is detailed below.

Consultation

3.3.3. An email consultation was held with Zoe Haysted from Natural England on 15 September 2025, during which the proposed methodology for the HRA of the Stockport Local Plan was shared for review.

3.3.4. The methodology presented to Natural England in relation to Air Quality includes the following:

- A baseline review of development locations, emission sources, and Air Pollution Information System (APIS)¹⁹ data;
- Definition of a 13.7km Zol based on average car trips from the 2023 National Transport Survey; and
- Screening of international sites located within Zol and within 200m of strategic roads.

3.3.5. Natural England responded with the following comments:

- All development allocations must consider aerial pollutants from traffic emissions during the screening stage, including new and upgraded roads.
- Designated sites located within 200m of roads with increased traffic and vulnerable habitats must be included in the HRA.
- The proposed Zol should be reconsidered in favour of locally specific travel-to-work distances.
- Where there is a credible and clearly evidenced risk that air quality impacts might extend beyond 200 metres from a road, additional sites should also be scoped into the HRA;
- An in-combination assessment of other plans and projects is required. It is recommended that link analysis is used within traffic modelling for motorways to distinguish the Local Plan (in combination) traffic from additional through traffic from wider growth.
- Consideration should be given to the Places for Everyone plan²⁰ consisting of nine Greater Manchester districts (Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford, and Wigan):
 - Attention should be paid to Policy JP-C8: Transport Requirements of New Development, which provides specific recommendations for Manchester Mosses SAC, specifically Holcroft

¹⁹ Air Pollution Information System (APIS). Available at: <http://www.apis.ac.uk/>

²⁰ Greater Manchester Combined Authority (2024). *Places for Everyone*. Available at: <https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/strategic-planning/places-for-everyone/>

Moss Site of Special Scientific Interest (SSSI), which may be pertinent to your air quality assessment; and

- Any planning application accompanied by a transport assessment must evaluate whether it would result in increased traffic flows on the M62 past Holcroft Moss of more than 100 vehicles per day or 20 Heavy Goods Vehicles (HGVs) per day. Proposals meeting these thresholds must include a scheme-specific package of measures to reduce car dependency, minimise trip generation, promote ultra-low emission vehicles, and contribute to restoration measures in accordance with the Holcroft Moss Habitat Mitigation Plan. Further details are provided in the Holcroft Moss Planning Obligations Supplementary Planning Document (SPD)²¹.

3.3.6. We have addressed Natural England’s comments through the following actions:

- The Zol has been updated to reflect weighted average ‘travel to work’ data for the Stockport area²² which has resulted in the application of a 10.7km ZOI for air quality. This is specific to air quality; the 15km ZOI still applies in relation to ecological impact pathways, including hydrological connectivity, recreational pressure and indirect disturbance at functionally linked land.
- While The Manchester Mosses SAC and Holcroft Moss SSSI falls outside of the Zol, these have been included in the assessment in accordance with Policy JP-C8. The potential impacts beyond 200m of the main roads²³ to be investigated at Regulation 19 Stage when more information becomes available.
- With regard to the assessment of in-combination impacts, the consideration of Places for Everyone plan, and the assessment of potential impacts along the M62 past Holcroft Moss, this will be further assessed at the Regulation 19 stage once traffic data becomes available.

3.3.7.

3.4 DATA COLLECTION

3.4.1. The screening stage takes into account the baseline condition of the international sites and their qualifying features²⁴, including (where reported) data on:

- The international site boundaries.
- The published site Conservation Objectives.
- Information on the attributes of the International sites that contribute to and define their integrity.

²¹ Greater Manchester Combined Authority (2024). *Holcroft Moss Planning Obligations Supplementary Planning Document Initial SEA Determination Statement*. Available at: https://www.greatermanchester-ca.gov.uk/media/9904/sea-initial-screen_hmspd_july-2024.pdf

²² Office for National Statistics (2021). *Distance travelled to work*. Available at: <https://www.ons.gov.uk/census/maps/choropleth/work/distance-travelled-to-work/workplace-travel-4a/works-mainly-from-home?lad=E08000007>

²³ i.e. trunk roads, A-roads and some B-roads. Changes in the number of vehicles using minor roads in the region will be too small to meaningfully assess using the industry standard approaches to AADT modelling that can be applied at the strategy-level (i.e. without substantial additional data collection including field monitoring at specific locations – this may be appropriate for a specific development or allocation but not for traffic-growth generally).

²⁴ The interest features are taken to be the qualifying features; and other site features that may be relevant to site integrity, particularly ‘typical species’ (for SACs) and within-site supporting habitats for SPAs.

- The condition, vulnerabilities and sensitivities of the sites and their qualifying features, including known pressures and threats.
- The approximate locations of the qualifying features within each site (if reported); and
- Designated or non-designated 'functional habitats' (if identified).

3.4.2. These data are derived from (where available / relevant):

- The most recent JNCC-hosted GIS datasets.
- The Standard Data forms for sacs and spas and Information Sheets for Ramsar sites.
- Article 12 and 17 reporting (Birds Directive).
- Supplementary Advice to the conservation objectives (SACO), where available²⁵.
- Site Improvement Plans (SIPs).
- Core Management Plans (Wales only); and
- The supporting Site of Special Scientific Interest's favourable condition tables, where relevant, and where no SACOs applicable to the features are available.

3.4.3. Where possible, the site data is used to identify other features that may be relevant to site integrity, particularly '**typical species**' (for SACs), within-site **supporting habitats**, and designated or non-designated '**functional habitats**'.

3.4.4. A '**typical species**' is broadly described by EC guidance as being any species (or community of species) which is particularly characteristic of, confined to, and/or dependent upon the qualifying Annex I habitat feature at a particular site. This may include those species which:

- Are critical to the composition or structure of an Annex I habitat (e.g. Constant species identified by the National Vegetation Classification (NVC) community classification).
- Exert a critical positive influence on the Annex I habitat's structure or function (e.g. a bioturbator (mixer of soil/sediment), grazer, surface borer or predator).
- Are consistently associated with, and dependent upon, the Annex I habitat feature for specific ecological needs (e.g. feeding, sheltering), completion of life-cycle stages (e.g. Egg-laying) and/or during certain seasons/times; or
- Are particularly distinctive or representative of the Annex I habitat feature at a particular site.

3.4.5. Within-site **supporting habitats** are those which support the population(s) of the qualifying species, and which are therefore critical to the integrity of the feature.

3.4.6. '**Functional habitats**' are generally taken to be habitats or features outside an international site boundary that are important or critical to the functional integrity of the site habitats and / or its qualifying features. These might include, for example:

- Buffer' areas around a site (e.g. Dense scrub areas preventing public access; areas of land or water that reduce the effects of agricultural run-off, etc.)

²⁵ NE has published 'Supplementary advice on conserving and restoring site features' for most European sites in England which describe in more detail the range of ecological attributes which are most likely to contribute to a site's overall integrity, and the targets each qualifying feature needs to achieve in order for the site's conservation objectives to be met.

- Specific features or habitats relied on by mobile species during their lifecycle (e.g. High-tide roosts for waders; significant maternity colonies for bats known to hibernate within an SAC; areas that are critical for foraging or migration, etc. Note, this is not intended as a speculative catch-all covering any habitat that might be occasionally used by, or suitable for, a particular species²⁶).

3.5 REVIEWING THE EMERGING PLAN

- 3.5.1. The principles²⁷ of ‘screening’ are applied to the emerging plan and its components (i.e. the policies and allocations) as part of an iterative review process, to ensure that:
- Any necessary technical assessments focus on those plan aspects that are likely to result in significant effects on International sites; and
 - That the policies of the adopted plan are drafted to provide appropriate overarching safeguards that help (alongside any subsequently identified mitigation) to ensure that the adopted plan will have no significant effects or no significant adverse effects on the integrity of the international sites.
- 3.5.2. The outcomes of the HRA reviews are reported as appropriate at each consultation stage; this reporting may outline anticipated conclusions in relation to specific plan aspects. The outcomes of these reviews are revisited throughout plan evolution to ensure that they remain robust, and that the overall performance of the plan in relation to the safeguarding of International sites meets expectations.
- 3.5.3. The reviews are intended to be a coarse filter for identifying potential effect pathways that cannot be self-evidently discounted, and hence those aspects where further investigation (‘appropriate assessment’) is required to determine the scale or nature of any effects and / or any bespoke mitigation that is necessary, rather than detailed assessments in their own right.

3.6 SCREENING / ASSESSMENT OF THE DRAFT PLANS

- 3.6.1. The Preferred Options (Reg. 18) and Submission (Reg. 19) draft plans are accompanied by HRA documents that include a ‘screening’ and ‘appropriate assessment’, setting out the HRA-related evidence and the anticipated conclusion (if the plan were to be adopted as drafted, recognising that the HRA can only be completed for the final, adopted plan).
- 3.6.2. The ‘screening’ in these HRAs identifies the following aspects and excludes them from the scope of the appropriate assessment:
- Those International sites that are **not** vulnerable (i.e. both exposed and sensitive) to the outcomes of the plan; and
 - The policies and allocations that cannot have significant effects, alone or in combination, or which cannot be assessed at the plan level (e.g. policies that support development or other changes) but which are too general to allow any specific assessments of effects (i.e. the locations, scale,

²⁶ Case law notes that such land should be necessary to the conservation of the protected habitat types and species (Holohan v An Bord Pleanala C-461/17) or play an important role in maintaining or restoring the population of qualifying species at favourable conservation status.

²⁷ i.e. exploring whether significant effects on European sites are possible; note, from a strict procedural perspective the tests in Regulation 105 (including the ‘test of significance’) can only be formally applied to the plan intended for adoption and not to its various phases or iterations; therefore, the term ‘screening’ is used advisedly when applied to assessments completed at earlier stages of the plan development.

quantum etc. are not specified below the geographical level of the plan, assuming that the type of development proposed is not such that significant effects would be unavoidable regardless of these aspects).

3.6.3. **The ‘screening’ does not take into account ‘mitigation’, in accordance with ‘People over Wind’.**

3.7 IN COMBINATION EFFECTS

- 3.7.1. Consideration of ‘in combination’ effects is not a separate assessment but is integral to both the screening and appropriate assessment stages.
- 3.7.2. At the screening stage the ‘in combination’ assessment focuses on those Local Plan effects that are concluded as having ‘no likely significant effect’, aiming to identify whether effects might interact with other plans or projects to result in likely significant effects on an international site in combination (recognising that Local Plan effects that are effectively nil and indistinguishable from background variations cannot operate ‘in combination’ and so can be excluded from the in combination assessment at the screening stage). Any likely significant ‘in combination’ effects identified are then considered at the appropriate assessment stage, where the assessment aims to determine whether the residual effects of the Local Plan (after mitigation is accounted for) could nevertheless interact with aspects of other plans and projects to adversely affect the integrity of an international site.
- 3.7.3. There is limited guidance available on the scope of the ‘in combination’ element, particularly with regard to which plans or projects should be considered.
- 3.7.4. The assessment of in combination effects arising within the Local Plan itself, or between Local Plans (e.g. of allocations cumulatively or the overall quantum of development regionally) is fundamentally integrated into the assessments, as most effect pathways (e.g. increased recreational pressure) are inherently cumulative.
- 3.7.5. However, the assessment should not be limited to plans at the same level in the planning hierarchy, and there is consequently a wide range of strategic plans that could have potential ‘in combination’ effects with the Local Plan. The plans identified by the Sustainability Appraisal (SA) provide the basis for the assessment of ‘in combination’ effects with strategic plans; these plans are reviewed to identify any potential effects (see **Appendix B**) and then considered (as necessary) within the screening and future appropriate assessment stages. The assessment does not generally include national strategies, national policy or legislation since the Local Plan must be compliant with these. The assessment takes account of any HRAs completed for those plans, where these are freely available for review²⁸. It is considered that ‘in combination’ effects are most likely in respect of other regional and sub-regional development plans and strategies.
- 3.7.6. With regard to projects, the Planning Inspectorate’s National Infrastructure Projects database²⁹ is used to identify major projects with the potential to affect the International sites in the HRA scope, along with any other major projects that CCC are advised of during the plan development process. However, it should be noted that the in-combination assessment can be greatly limited by the

²⁸ There is no statutory requirement to issue HRAs for public comment, and so many HRAs are not available or are only made available publicly for short consultation periods. In these instances, it is assumed that the HRA of the plan was able to conclude ‘no adverse effects’ if the relevant plan has been adopted.

²⁹ <https://infrastructure.planninginspectorate.gov.uk/projects/>

information available for other plans and projects, particularly where these are at an early stage of development.

- 3.7.7. It is not generally possible to produce a definitive list of existing minor planning applications near each International site, and generating a list of these is typically of little value since many will be consented and delivered prior to the plan being adopted, and/or before developments supported by the plan are bought forward (i.e. they will form part of the baseline for future project-level HRAs); they typically must meet the policy requirements of the Local Plan also

3.8 NOTES ON MITIGATION AND AVOIDANCE

- 3.8.1. The development of avoidance or mitigation measures is important to the HRA and plan development process. 'Avoidance measures' are those that are implemented during the iterative plan development process (for example, abandoning a policy or allocation that is likely to have unavoidable adverse effects if implemented)¹⁸; mitigation measures are used where significant effects are identified in order to prevent adverse effects on a site's integrity³⁰.
- 3.8.2. Avoidance or mitigation measures should aim to reduce the probability or magnitude of impacts on an international site until 'no likely significant effects' or 'no adverse effects on integrity' are anticipated, and they will generally involve the development and adoption of (for example) wording changes to policies, or additional safeguarding policies. Measures must be specific and targeted, and likely to work; it is not appropriate to re-state existing legislation or policy, for example, by adding "and must have no significant effect on any International site" (or similar) to every policy. The avoidance or mitigation measures should also reflect the limited influence that the Council can exert on non-planning issues and should not generally exceed requirements set by national planning policy or guidance.
- 3.8.3. The 'People Over Wind' judgment creates some issues for the application of avoidance and mitigation measures in the HRA process, stating that "...it is not appropriate, at the screening stage, to take account of the measures intended to avoid or reduce the harmful effects [mitigation] of the plan or project on that site"; as noted, this contrasts with established practice in this area (based on the 'Dilly Lane' judgment).
- 3.8.4. There is limited guidance on the practical implementation of the 'People over Wind' judgment, particularly for plan-level HRAs where the assessment process is usually concurrent with plan development and where measures are invariably incorporated into the plan before the formal 'screening' of the final version takes place. Indeed, many 'recommendations' derived from an iterative policy review process might be interpreted as 'avoidance' or 'mitigation' measures if viewed solely in terms of their implications for International sites, making it difficult to distinguish between basic good policy practice and 'mitigation'.
- 3.8.5. For example, generic policies promoting the use of Sustainable Drainage Systems (SuDS), or safeguarding designated sites (including International sites), or requiring that developers ensure utility provision in advance of occupation, are fairly standard inclusions in virtually all land-use plans, but will all act to moderate potential environmental changes that could affect International sites.

³⁰ Although it should be noted that not all 'likely significant effects' will require mitigation measures: the effect may be considered to be likely to be significant (i.e. has the potential to undermine the conservation objectives) but may be shown on further examination to be too limited to have any risk of adversely affecting site integrity.

However, it would clearly be illogical to attempt to screen a hypothetical version of the plan that did not include such policies, particularly if these are included independently of the HRA results.

- 3.8.6. The broader context of the ‘People over Wind’ case suggests that the judgment is principally focusing on those instances where specific measures are included or relied on to avoid or mitigate a specific effect that has been identified, and which would otherwise be significant; the judgment argues that the effectiveness of any such measures should be examined through an appropriate assessment stage. It is therefore arguable that an exhaustive examination of a plan’s genesis to see if any aspects might count as ‘mitigation’ for screening purposes is not necessary, or (arguably) consistent with the intent of the Habitats Directive or the ‘People over Wind’ judgment.
- 3.8.7. Therefore, the screening **does not** take into account specific measures that are included in response to a specific identified effect on an international site, and which are intended to avoid or reduce that effect. However, generic policy safeguards that would be included regardless of the presence of International sites are essentially just ‘the plan’ and are not considered to be ‘mitigation’ unless there is a specific effect or pathway that they are intended or relied on to obviate. Aspects requiring specific investigations to understand the problem (and hence the mitigation requirements), or which rely on established mitigation to avoid an effect, are subject to AA.

3.9 UNCERTAINTY AND ‘DOWN THE LINE’ ASSESSMENT

- 3.9.1. For most policies, even at the strategic level, it will be clear if adverse effects are likely at an early stage, and in these instances, the policy should not be included within the plan since plans should not include proposals which would be likely to fail the Habitats Regulations tests at the project application stage. For other options, however, the effects may be uncertain; it is therefore important that this uncertainty is addressed either through additional investigation or (if this is not possible) appropriate mitigation measures that provide certainty that the predicted effect will not occur or will not adversely affect site integrity.
- 3.9.2. It is usually possible to incorporate caveats or measures within policy text that are sufficient to ensure that adverse effects will not occur. However, for other policies, this may not be possible because there is insufficient available information about the nature of the development that is being proposed through the policy to enable a robust conclusion to be reached. In these instances, it may be appropriate and acceptable for assessment to be undertaken ‘down the line’ at a lower tier in the planning hierarchy. For this to be acceptable, the following conditions must be met:
- the higher tier plan appraisal cannot reasonably predict the effects on an international site in a meaningful way; whereas:
 - the lower tier plan, which will identify more precisely the nature, scale or location of development, and thus its potential effects, retains enough flexibility within the terms of the higher tier plan over the exact location, scale or nature of the proposal to enable an adverse effect on site integrity to be avoided; and
 - HRA of the plan at the lower tier is required as a matter of law or Government policy.
- 3.9.3. This approach is applied as appropriate to the screening stage.

4 IMPACT PATHWAYS

4.1 EFFECT PATHWAYS AND KEY REGIONAL PRESSURES

- 4.1.1. The provisions of the Habitats Regulations ensure that ‘direct’ (encroachment) effects on International sites as a result of land use change (i.e. the partial or complete destruction of an international site) are extremely unlikely under normal circumstances, and this will not occur as a result of the Local Plan. Indeed, Local Plans will generally assist in the safeguarding of International sites through their protective policies. However, there will be a number of areas where the direction, controls or influence provided by a plan can result in outcomes that can affect International site qualifying features.
- 4.1.2. Most potential effect pathways are associated with broad ‘quantum of development’ or population growth aspects, and whilst a Local Plan is not necessarily the main driver of these effects, they do have a key role in managing them locally through the site allocation process. In this context, the main aspects through which the Local Plan could affect International sites in the study area are:
- through individual allocations or supported developments that are ‘directed’ to a specific location or area; or
 - through ‘in combination’ effects resulting from the cumulative impacts of development associated with the Local Plan and with the plans and programmes of external authorities (such as neighbouring LPAs).
- 4.1.3. These aspects could affect International sites on their own, through typical development-related mechanisms operating at the local scale in relation to specific allocations (e.g. noise, lighting, etc.; see **Table 4-1**); or collectively by exacerbating regional pressures (e.g. pressures on water supply).

Table 4-1 - Typical effect pathways and environmental changes associated with terrestrial development

Pressure / Threat	Common environmental changes
Hydrological changes	Temperature changes Salinity changes Water flow changes Flood regime changes
Pollution and other chemical changes	Non-synthetic and synthetic compound contamination Radionuclide contamination Introduction of other substances (solid, liquid or gas) De-oxygenation Nutrient enrichment Organic enrichment
Physical loss	Physical loss of habitat Physical change to another habitat
Physical damage	Habitat structure changes Changes in suspended solids Siltation rate changes
Pressure / Threat	Common environmental changes
Other physical pressures	Litter Electromagnetic changes Noise changes Introduction of light Barrier to species movement Death or injury by collision
Biological pressures	Visual disturbance Genetic modification and translocation of indigenous species Introduction or spread of non-indigenous species Introduction of microbial pathogens Exploitation / harvesting of species Removal of non-target species during exploitation / harvesting

- 4.1.4. Likely significant effects as a result of individual allocations ‘alone’ are typically unlikely as most environmental changes have a limited ‘zone of influence’ (for example, noise effects on species will rarely be significant over 500m from the source based on natural rates of attenuation alone), and most allocations will not be located particularly close to an international site. However, the Local Plan HRA must also consider the potential for development supported by the plan to operate ‘in combination’ both internally (e.g. between allocations) or with external plans and programmes (e.g. cumulative housing growth regionally). ‘In combination’ changes are often of an inherently larger scale or operate over larger areas.

4.1.5. There is obviously a wide range of potential mechanisms and pathways for ‘in combination’ effects depending on the International sites and features. However, there are a few key mechanisms by which local plans (etc.) most commonly operate cumulatively to affect International sites; these are noted below, and provide the broad framework for assessing potential ‘in combination’ effects associated with the Local Plan:

- **Recreational pressure:** Many International sites will be vulnerable to some degree of impact as a result of recreational pressure, although the effects of recreational pressure are complex and very much dependent on the specific conditions and qualifying features at each site. Local plans can influence recreational pressure through their allocations and associated controls.
- **Urbanisation:** Urbanisation is generally used as a collective term covering a suite of often disparate risks and impacts that occur due to increases in human populations near protected sites. This would include varied aspects such as fly-tipping or vandalism, predation by cats, or the dispersal of invasive species, although the effects of these aspects depend on proximity, accessibility and the qualifying features of the sites. This is generally only realised where allocations are close to a designated site.
- **Atmospheric pollution:** The most relevant air pollutants to habitats and species (particularly plant species) are the primary pollutants sulphur dioxide (SO₂, typically from combustion of coal and heavy fuel oils), nitrogen oxides (NO_x, mainly from vehicles) and ammonia (NH₃, typically from agriculture). These pollutants affect habitats and species mainly through acidification and eutrophication. Local Plans will generally have few specific point-sources for air emissions, and such emissions would typically be controlled through project-level permissions; the main issue for local plans is the assessment of ‘in combination’ effects due to air quality changes that might be associated with the quantum of development growth proposed / supported by a Local Plan, particularly in relation to traffic and N-deposition.
- **Water resources and flow regulation:** The exploitation and management of water resources is connected to a range of activities, most of which are not directly controlled or influenced by local plans; for example, agriculture, flood defence, recreation, power generation, fisheries and nature conservation. Much of the water supply to water-resource sensitive International sites is therefore managed through specific consenting regimes that are independent of local plans. Increased housing growth (which is likely to be supported by a local plan) increases demand on public water supply abstractions, some of which are associated with International sites; however, the consenting regimes are subject to HRA and, importantly, water companies are required to produce 25-year Water Resource Management Plans (WRMPs) that take into account predicted population growth and protected sites when considering future water resource provision. It is therefore very unlikely that development within one local planning authority area could have direct and consequential effects on an international site if growth is in line with water company predictions, particularly as most water companies operate conjunctive-use systems that do not rely on single-source provision. This aspect is most typically managed through policy.
- **Water quality:** Most waterbodies and watercourses are affected to some extent by point or diffuse sources of pollutants, notably nitrates and phosphates. Point sources are usually discrete discharge points, such as wastewater treatment works (WTW) outfalls, which are generally managed through specific consenting regimes that are independent of local plans. In contrast, diffuse pollution is derived from a range of sources (e.g. agricultural run-off; road run-off) that cannot always be easily traced or quantified. Development promoted or supported by local plans

is likely to increase demand on wastewater treatment works and potentially increase run-off, which could indirectly affect downstream International sites – although there will inevitably be attenuation as distance from the source increases.

- 4.1.6. In addition, many European qualifying features (particularly more mobile animal species) may use or be reliant on non-designated habitats outside of an international site during their life-cycle. All of the above aspects (recreation, water resources, etc.) can therefore also affect international site integrity indirectly through effects on 'functional habitats' beyond the designated site boundary.

5 RELEVANT INTERNATIONAL SITES

5.1.1. The HRA of the Local Plan will consider potential effects on:

- all International sites within 15km³¹ of the Council's administrative area (see **Figure 1** and **Table 5-1**).
- any additional sites that may be hydrologically linked to the Local Plan's zone of influence; and
- any additional sites identified by Natural England following the Issues and Options consultation.

5.1.2. This is considered to be a suitably precautionary starting point for the assessment of the Local Plan.

Note, at the screening stage, the zone of influence (Zol) has been established considering sites where there is a likelihood that they may reasonably be affected and that any sites outside of the Zol have been assessed as not having any pathways through which an effect is likely. As a result, international sites outside of the Zol are not considered within this assessment.

Table 5-1 - International sites (and component SSSIs) within 15km of the SMBC area

International site	Location relative to the SMBC boundary	Relevant SSSIs (only within 15km)
South Pennine Moors SAC	2.75km east	Dark Peak SSSI, Leek Moors SSSI
Peak District Moors (South Pennine Moors Phase 1) SPA	2.75km east	Dark Peak SSSI, Leek Moors SSSI
Rochdale Canal SAC	5.6km north	Rochdale Canal SSSI
Rostherne Mere Ramsar	8.8km southwest	Rostherne Mere SSSI
Midland Meres & Mosses - Phase 1 Ramsar	9.4km southwest	Tatton Meres SSSI and The Mere SSSI
Manchester Mosses SAC	15.4km northwest*	Astley & Bedford Mosses SSSI, Holcroft Moss SSSI, Risley Moss SSSI

*included following consultation with Natural England in relation to potential air quality impact pathways

5.1.3. With regard to potential hydrologically linked receptors, Stockport is located within the Upper Mersey catchment area, where the River Mersey is formed by the confluence of the rivers Bollin, Goyt and Tame. The waters from the main rivers drain into the Upper River Mersey (and the Manchester Ship Canal), which leads to the Lower Mersey Catchment (Mersey Estuary) and finally to the Mersey Estuary SPA and Ramsar sites (and Mersey Estuary SSSI) approximately 33km west. These designated sites are all a substantial distance downstream, such that the only plausible mechanism for effects on the sites themselves would be via cumulative effects on water quality; however, these International sites have not been identified as sites that are in unfavourable condition due to excessive nutrients (such that the approach to seeking 'nutrient neutrality'³² in

³¹ Adjust to 10.7km

³² Poor water quality due to nutrient enrichment from elevated nitrogen and phosphorus levels is one of the primary reasons for European sites being in unfavourable condition, and substantial reductions are needed to achieve favourable conservation status.

permitting projects is being deployed or considered as mitigation) in NE advice to LPAs³³, and all other potential water quality effects have been screened out as can be managed through the development of appropriate policies (such as ENV 7: Environmental protection).

- 5.1.4. United Utilities provides water for SMBC. Its Water Resource Management Plan 2024 HRA states that for Rochdale Canal SAC and Manchester Mosses SAC, there are no pathways for operation or construction-related effects due to a lack of hydrological connectivity from allocated sites and related policy areas to international sites. For Midland Meres and Mosses Phase 1 Ramsar, there are no pathways for operation or construction-related effects as the site is not impacted by the catchment abstraction and pipeline route. Equally, the South Pennine Moors (SAC and SPA) are up-catchment, and water resourcing has no pathways to the Stockport Borough.
- 5.1.5. Importantly, much of the water supply to water-resource sensitive international sites is managed through specific consenting regimes that are independent of the Local Plan.
- 5.1.6. The following sections provide a summary of the international sites within 15km of the SMBC area, including a contextual overview of each site, their qualifying features, their condition, and the current pressures and threats identified for each site³⁴. These are based on the citations for the designated sites, the Site Improvement Plans (SIPs), information on the condition of the underlying SSSIs, and any supplementary advice provided by Natural England³⁵. A summary of the conservation objectives is subsequently provided.
- 5.1.7. The extent of each site in favourable or unfavourable condition has been estimated using the Natural England condition assessments for the corresponding SSSI units, although it must be noted that the boundaries of the component SSSI units (to which the condition assessments relate) do not always match the International site boundaries exactly (i.e. the SSSIs are often larger) and it is not always possible to split SSSI units to determine the precise area of the International site (or qualifying feature) that is in each condition category.
- 5.1.8. The potential mechanisms by which the Local Plan could affect these sites are discussed in **Section 3.1**. There are many factors currently affecting the International sites over which the Local Plan will have no or little influence; analysis of the available International site data and the SSSI condition assessments indicates that the most common reasons for an 'unfavourable' condition assessment of the component SSSI units are due to inappropriate management of some form (e.g. over or under grazing, scrub control, water-level management etc.)

'Nutrient neutrality' is a mitigation approach that potentially allows new developments to be approved provided that there is no net increase in nutrient loading within the catchments of the affected European site

³³ Letter from NE to LPA Chief Executives and Heads of Planning, 16 March 2022; Re. Advice for development proposals with the potential to affect water quality resulting in adverse nutrient impacts on habitats sites.

³⁴ The Natural England Site Improvement Plans identify 'pressures', which are factors that are known to be currently affecting a site, and 'threats' which are factors that may not be exerting a pressure at the moment, but which have the potential to do so based on local site knowledge

³⁵ NE has published 'Supplementary advice on conserving and restoring site features' for South Pennine Moors, Rochdale Canal SAC, and Evidence Plans for Rostherne Mere and Midland Meres & Mosses - Phase 1 Ramsars, which describe in more detail the range of ecological attributes which are most likely to contribute to a site's overall integrity, and the targets each qualifying feature needs to achieve in order for the site's conservation objectives to be met.

5.2 SOUTH PENNINE MOORS SAC

Overview

- 5.2.1. South Pennine Moors covers the key moorland blocks of the Southern Pennines from Ilkley Moor in the north to the Peak District in the south. The moorlands are on a rolling dissected plateau formed from rocks of Millstone Grit at altitudes of between 300m – 600m and a high point of over 630m at Kinder Scout. The greater part of the gritstone is overlain by blanket peat, with the coarse, gravely mineral soils occurring only on the lower slopes. The moorlands as a whole support a breeding bird community of national and international importance. The site is representative of upland dry heath, which covers extensive areas, occupies the lower slopes of the moors on mineral soils or where peat is thin, and occurs in transitions to acid grassland, wet heath and blanket bogs.
- 5.2.2. The site also supports extensive areas of acid grassland, largely derived from dry and wet heath. In the cloughs, or valleys, which extend into the heather moorlands, a greater mix of dwarf shrubs can be found together with more lichens and mosses.
- 5.2.3. The moors support a rich invertebrate fauna, especially moths, and important bird assemblages. This site also contains areas of blanket bog, although the bog vegetation communities are botanically poor. Where the blanket peats are slightly drier, heather *Calluna vulgaris*, crowberry *Empetrum nigrum* and bilberry *Vaccinium myrtillus* become more prominent. Substantial areas of the bog surface are eroding, and there are extensive areas of bare peat. In some areas, erosion may be a natural process reflecting the great age (up to 9000 years) of the South Pennine peats. Around the fringes of the upland heath and areas of bog are blocks of old sessile oak woods, usually on slopes. These tend to be drier than those further north and west, such that the bryophyte communities are less developed (although this lowered diversity may in some instances have been exaggerated by the effects of 19th-century air pollution).
- 5.2.4. Other components of the ground flora, such as grasses, dwarf shrubs and ferns, are common. Small areas of alder woodland along stream-sides add to the overall richness of the woods. The moorland also supports a range of flush and fen habitats associated with bogs, cloughs, rivers and streams. Although generally small-scale features, they have a specialised flora and fauna, which makes a great contribution to the overall biodiversity of the moors.

Qualifying Features

- 5.2.5. The South Pennine Moors SAC is designated for the following Annexe I habitats:
- European dry heaths
 - Blanket Bogs³⁶
 - Old sessile oak woods with Ilex and Blechnum in the British Isles
- 5.2.6. In addition, the following Annexe I habitats are present as qualifying features, but not as primary reasons for the selection of the SAC:
- Northern Atlantic wet heaths with *Erica tetralix*
 - Transition mires and quaking bogs

³⁶ Active blanket bog is a Priority feature

5.2.7. No Annex II species are primary or qualifying features of the SAC.

Condition, Pressures and Threats

5.2.8. The SSSIs underpinning the SAC are currently in 'unfavourable - recovering' condition (based on NE's 2024 assessment), and the SIPs identify the current pressures affecting SAC integrity as:

- Land management (ditch management regime, scrub encroachment, undergrazing, weeds / inappropriate species, land use change, overgrazing, livestock and wild animals)
- Invasive non-native species
- Disturbance and recreational impacts (erosion, recreational disturbance, vehicles)
- Natural resources exploitation (peat extraction)
- Planning and development impacts (development)
- Fire (managed burning, uncontrolled vegetation fire)
- Freshwater impacts (physical modification, water level changes)
- Pollution (air pollution – non-road transport emissions)

5.2.9. The SIPs identifies several threats, principally:

- Hydrological changes
- Managed rotational burning
- Low breeding success and changes in species distributions (raptor bird species)
- Inappropriate management practices
- Disease (to interest plant species)
- Public access/disturbance
- Wildfire
- Vehicles
- Forestry and woodland management
- Planning permission

5.3 PEAK DISTRICT MOORS (SOUTH PENNINE MOORS PHASE 1) SPA

Overview

5.3.1. The site is an extensive tract of moorland and moorland-fringe habitat. It includes most of the unenclosed moorland areas of the north, eastern and south-western Peak District, where it also extends into enclosed farmland of wet rushy pasture, hay meadows and small wetlands in the valley bottoms. The moorland habitats include extensive tracts of blanket bog and dry heath, which together with wet heath, acid grassland, small flushes, gritstone edges and boulder slopes, streams and moorland reservoirs, fringing semi-natural woodland and enclosed farmland, represents the full range of upland vegetation characteristic of the South Pennines. The site supports several important species assemblages, including higher plants, lower plants and insects, as well as breeding birds. Many physical features are of geological interest.

Qualifying Features

- 5.3.2. The Peak District Moors (South Pennine Moors Phase 1) SPA is designated as it is used regularly by 1% or more of the Great Britain population of a species listed in Annex I, in any season:
- A098 Merlin *Falco columbarius* (Breeding)
 - A140 European golden plover *Pluvialis apricaria* (Breeding)
 - A222 Short-eared owl *Asio flammeus* (Breeding)
- 5.3.3. In addition, the site supports a rich upland breeding bird assemblage which, as well as the qualifying species listed above, includes important numbers of peregrine *Falco peregrinus*, lapwing *Vanellus vanellus*, dunlin *Calidris alpina schinzii*, snipe *Gallinago gallinago*, curlew *Numenius arquata*, Redshank *Tringa totanus*, Common Sandpiper *Actitis hypoleucos*, Whinchat *Saxicola rubetra*, wheatear *Oenanthe oenanthe*, ring Ouzel *Turdus torquatus* and twite *Carduelis flavirostris*.

Condition, Pressures and Threats

- 5.3.4. Much of the Peak District Moors are currently facing severe pressure from human activity, and inappropriate management regimes. High levels of air pollution and heavy metal deposition in the past have degraded the blanket peats and their vegetation and this shows in the peat record and the lack of bryophytes. Air pollution, particularly high levels of nitrogen and acid pollution, continue to be a challenge to maintaining and enhancing condition.
- 5.3.5. The SSSIs underpinning the SPA are the same as for South Pennine Moors SAC and thus both the SAC and SPA fall under the same SIPs and identify the same conditions, pressures and threats as those outlined above.

5.4 ROCHDALE CANAL SAC

Overview

- 5.4.1. Situated within the Greater Manchester area, the Rochdale Canal contains important habitats for submerged aquatic plants and emergent vegetation, including extensive colonies of the nationally scarce floating water-plantain *Luronium natans* in a botanically diverse water-plant community. This population of *Luronium* is representative of the formerly more widespread canal populations of north-west England. The diverse assemblage of aquatic flora includes nine species of pondweed *Potamogeton* spp. The plant communities found in the Rochdale Canal are characteristic of mesotrophic water bodies, i.e. those which are moderately nutrient-rich and a rich but generally common-place invertebrate assemblage in excess of 112 species; 13 of these species are of local importance. Two species are nationally scarce, a water beetle *Agabus uliginosus* (Notable B) and the Pea Mussel *Pisidium pulchellum*. The canal also provides habitat for a number of waterside bird species. Coot *Fulica atra*, moorhen *Fulica chloropus* and mallard *Anas platyrhynchos* breed along the length of the canal, whilst grey wagtail *Motacilla cinerea* also breeds in smaller numbers and kingfisher *Alcedo atthis* (Schedule 1, WCA 1981) regularly use the canal for feeding.

Qualifying Features

- 5.4.2. No Annex I habitats are primary or qualifying features of the SAC.
- 5.4.3. S1831 Floating water-plantain *Luronium natans* (Annex II species) is the primary reason for selection of the SAC.

Condition, Pressures and Threats

- 5.4.4. The SSSIs underpinning the SAC are currently in 'unfavourable - recovering' condition (based on NE's most recent assessment).
- 5.4.5. Air pollution is the explicit pressure identified within the SIP, specifically, impacts from atmospheric nitrogen deposition from vehicles.
- 5.4.6. The main threat identified within the SIP on the qualifying feature is physical modification of the canal and associated banks-side vegetation, including filtration.

5.5 ROSTHERNE MERE RAMSAR

Overview

- 5.5.1. Rostherne Mere is the deepest, one of the largest and the most northerly of the meres of the Cheshire Plain. It lies in a hollow surrounded by thick deposits of glacial drift overlying Triassic marls and saltbeds. It is a natural lake of high fertility that, over the years, has been increased by the accumulation of nutrients received from inflow streams and drainage from surrounding farmland and from Little Mere, a Victorian artificial amenity lake. The long-term study and analysis of the mere's water chemistry and limnology, together with comparisons with other meres, are important aspects of the site's nature conservation value.
- 5.5.2. The mere has little submerged vegetation but is fringed by a narrow band of Priority Habitat *Phragmites* reedbed for over half its circumference. Around the mere, the catchment slopes are primarily large blocks of woodland and moderately intensively-farmed grassland. Remains of a former peat-bog in the north and actively managed willow-beds to the south are other notable habitats.

The mere is nationally significant for supporting wintering ducks, especially Pochard *Aythya ferina* and Pintail *Anas acuta*, as well as gulls and cormorants *Phalacrocorax* spp. Its depth prevents quick freezing, making it a crucial bird refuge in cold weather. The basin's geomorphology is also nationally notable.

Qualifying Features

- 5.5.3. Rostherne Mere Ramsar is designated for open water transition fen ('mere').

The open water serves as a habitat for wintering birds, including populations of international significance. Three bird species present at nationally significant levels during winter are the great cormorant *Phalacrocorax carbo*, great bittern *Botaurus stellaris*, and water rail *Rallus aquaticus*, which account for the designation.

Condition, Pressures and Threats

- 5.5.4. Information taken from the most recent Evidence Pack (Natural England, June 2024) states nutrient pressures for which the site is unfavourable related to nitrogen and phosphorus. Higher nutrient concentrations and eutrophication can affect the dissolved oxygen levels in the water body, which in turn would influence the organisms present within the mere and thus have implications for the wider food web, and the species present.

5.6 MIDLAND MERES & MOSSES - PHASE 1 RAMSAR

Overview

The Meres and Mosses of the Clwyd-Shropshire-Cheshire-Staffordshire plain represent an internationally significant series of open water and peatland habitats. "Meres" denote pools, while "mosses" refer to mires or peatland sites. The area comprises over 60 meres and a smaller number of mosses, with meres varying in depth from roughly one metre to 27 metres, and in surface area from less than one hectare to 70 hectares.

While most meres are naturally nutrient-rich (eutrophic), water chemistry within the region is highly variable, reflecting the heterogeneous composition of surrounding drift deposits. Fringing zones such as reedbed, fen, carr, and damp pasture further enhance habitat value and biodiversity. The development of these habitats correlates with peat accumulation, sometimes leading to the complete infilling of basins. This process typically shifts the nutrient status of the peat surface to nutrient-poor (oligotrophic) and acidic conditions, promoting colonisation by species such as *Sphagnum* spp. In select cases, floating vegetation has covered the water surface, resulting in the formation of "quaking bogs" or "schwingmoor".

This site supports numerous nationally scarce wetland plant species. The area also hosts a notable assemblage of invertebrates, such as three species considered endangered in Britain.

Qualifying Features

- 5.6.1. Midland Meres & Mosses - Phase 1 Ramsar is designated for the following features:
- Ramsar criterion 1 The site comprises a diverse range of habitats from open water to raised bog.
 - Ramsar criterion 2 Supports a number of rare species of plants associated with wetlands including five nationally scarce species together with an assemblage of rare wetland invertebrates (three endangered insects and five other British Red Data Book species of invertebrates).

Condition, Pressures and Threats

- 5.6.2. A range of potentially threatening activities has been documented at the site, including agriculture, grazing, fishing, hunting, and recreation. The site has also been used for research and conservation. The site has experienced partial eutrophication due to human-induced factors, though some mires are naturally eutrophic. Additional nutrients have resulted from the intensification of agricultural activity, fertiliser runoff, and domestic and agricultural effluent.

5.7 MANCHESTER MOSSES SAC

Overview

This SAC supports an example of Degraded raised bogs still capable of natural regeneration. The deep acid peat still supports species typical of raised bogs, with a distinctive and specialised flora. This site was initially included as a Natura 2000 site to provide an example of the habitat type under restoration back to active bog. This raised bog vegetation corresponds to the UK NVC types; M2 *Sphagnum cuspidatum/recurvum* (*fallax*) bog pool community, M3 *Eriophorum angustifolium* bog pool community, M20 *Eriophorum vaginatum* blanket and raised mire and M25 - *Molinia caerulea* - *Potentilla erecta* mire (Rodwell, 1991). Floristically, the re-wet mosses are developing a community typical of lowland raised bog with an abundance of common cotton grass *Eriophorum angustifolium*,

hare's-tail cotton grass *Eriophorum vaginatum* and bog mosses such *Sphagnum fallax*, *Sphagnum cuspidatum* and *Sphagnum palustre* now established over large areas. The lawns of *Sphagnum* are providing habitat for sundew *Drosera rotundifolia*, cross leaved heath *Erica tetralix*, bog myrtle *Myrica gale*, cranberry *Vaccinium oxycoccus* and bog rosemary *Andromeda polifolia*. Also present at currently low levels within the areas of well-established bog are *Sphagnum palustre*, *Sphagnum magellanicum* and *Sphagnum capillifolium*.

Qualifying Features

- 5.7.1. The SAC contains H7120 Degraded raised bogs still capable of natural regeneration, Annex I habitat, which is the primary qualifying feature of the SAC.

Condition, Pressures and Threats

- 5.7.2. Conditions of the Annex I habitat vary between the three constituent SSSI sites and the area units under monitoring, with Holcroft Moss and Risley Moss habitats being in 'favourable' or 'unfavourable recovering'. Ashley & Bedford Mosses habitats are 'unfavourable declining' or 'unfavourable recovering.'
- 5.7.3. The main threats and pressures on the Manchester Mosses SAC are habitat loss and degradation from centuries of peat extraction, agriculture, and development, as well as ongoing pressure from urban expansion, transport, and infrastructure development. Other significant threats include air and water pollution from nearby industrial processes and traffic and increased recreational pressure from a growing human population.

CONSERVATION OBJECTIVES

- 5.7.4. The Conservation Objectives and Supplementary advice documents for the SACs and SPAs benchmark Favourable Conservation Status (FCS) for each feature. Guidance³⁷ from the UK Statutory Nature Conservation Bodies (SNCBs) provides a broad characterisation of FCS, stating that it "*relates to the long-term distribution and abundance of the populations of species in their natural range, and for habitats to the long-term natural distribution, structure and functions as well as the long-term survival of its typical species in their natural range. It describes a situation in which individual habitats and species are maintaining themselves at all relevant geographical scales and with good prospects to continue to do so in the future*".
- 5.7.5. The conservation objectives for the sites noted above have been revised by Natural England in recent years to improve the consistency of assessment and reporting. As a result, the high-level conservation objectives for all sites are effectively the same:
- 5.7.6. For SACs:
- *With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features'...), and subject to natural change; ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring [as applicable to each site];*

³⁷ JNCC (2018). Favourable Conservation Status: UK Statutory Nature Conservation Bodies Common Statement [online]. Available at: <https://data.jncc.gov.uk/data/b9c7f55f-ed9d-4d3c-b484-c21758cec4fe/FCS18-InterAgency-Statement.pdf>. [Accessed September 2025].

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

5.7.7. For SPAs:

- *With regard to the SPA and the individual species and/or assemblage of species for which the site has been classified (the ‘Qualifying Features’...), and subject to natural change; 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;*
 - *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.*

5.7.8. The conservation objectives for Ramsar sites are taken to be the same as for the corresponding SACs / SPAs (where sites overlap). The conservation objectives are considered when assessing the potential effects of plans and policies on the sites; information on the sensitivities of the qualifying features also informs the assessment.

5.7.9. As noted, NE has published ‘Supplementary advice on conserving and restoring site features’ for South Pennine Moors SAC, Peak District Moors (South Pennine Moors Phase 1) SPA and Rochdale Canal SAC, which describe in more detail the range of ecological attributes which are most likely to contribute to a site’s overall integrity, and the minimum targets each qualifying feature needs to achieve in order to meet the site’s conservation objectives. These are considered at the screening stage (and must be reviewed at future appropriate assessment stage, as necessary).

6 PREFERRED OPTIONS ‘SCREENING’

6.1 REVIEW OF PREFERRED OPTIONS POLICIES

- 6.1.1. When considering the likely effects of a policy, it is recognised that some policy ‘types’ cannot usually result in impacts on any European sites. Different guidance documents suggest various classification and referencing systems to help identify those policies that can be ‘screened out’ on that basis; the general characteristics of these policy types are summarised in **Table 6-1**.

Table 6-1 - Policy ‘types’ that can usually be screened out

Broad Policy Type	Notes
General statements of policy / aspiration	The European Commission recognises* that plans or plan components that are general statements of policy or political aspirations cannot have significant effects; for example, general commitments to sustainable development. This may include policies that support development or other changes, but which are too general (e.g. locations, scale, quantum, etc., not specified below the geographical level of the plan) to allow any specific assessments of effects, provided that the type of development proposed is not such that significant effects would be unavoidable regardless of location, etc.
General design / guidance criteria or policies that cannot lead to or trigger development	A general ‘criteria-based’ policy expresses the tests or expectations of the plan-making body when it comes to considering proposals or relates to design or other qualitative criteria which do not themselves lead to development (e.g. controls on building design; requirements for affordable homes; etc); however, policies with criteria relating to specific proposals or allocations should not be screened out.
External plans / projects	Plans or projects that are proposed by other plans or permissions regimes and which are referred to in the plan being assessed for completeness (for example, Highways Agency road schemes; specific waste development proposals promoted by a Joint Minerals and Waste Plan; DCO applications being advanced separately from the plan at hand); however, these would be considered as part of the plan-level ‘in combination’ assessment.
Environmental protection policies	Policies designed to protect the natural or built environment will not usually have significant or adverse effects (although they may often require modification if relied on to provide sufficient safeguards for other policies).
Policies which make provision for change, but which could have no conceivable effect	Policies or proposals that cannot affect a European site (due to there being no impact pathways and hence no effect; for example, proposals for a new cycle path several kilometres from the nearest European site; criteria for a development’s appearance; etc.) or which cannot undermine the conservation objectives, either alone or in combination, if impact pathways exist

- 6.1.2. The review considers the policies collectively and individually, and so takes the non-specific crosscutting protective policies within the plan into account although cross-cutting or overarching policies are not relied on where specific mitigation for specific effects is considered necessary for the policy (this is particularly relevant for policies that provide broad or non-specific support for development but which are screened out because they do not define or direct particular developments or activities; in these instances the plan’s protective policies will form a key part of the overall decision making process). The review also considers any internal tensions within the plan that may be relevant to HRA.
- 6.1.3. In summary, the vast majority of the planning policies contained in the Preferred Options Local Plan are categorised as ‘no effect’ as they are not directly related to development. However, for the benefit of this assessment, they are listed as ‘no likely significant effect’ policies. **Table 6-2** contains those policies which are screened in for assessment. All other policies are screened out due to a lack of an impact pathway. Some policies have been grouped due to their policy family, meaning impact pathways are the same.

Table 6-2 - Proposed Policies for assessment under HRA

Policies	Screening rationale
COM 1: Healthy and active across all ages	<p>The Policy states development must both increase access to existing and create new green spaces and green infrastructure. It has some specific elements that will moderate / provide some mitigation for visitor pressure, but it is recognised that the moderating effects will be small and so they have been discounted from the screening assessment.</p> <p>As the policy is not related to development and no specific linkages with international sites are identified, it is concluded as having no likely significant effects.</p>
COM 4: Protection of open space and recreation facilities	<p>Policy relates to potential loss of open space or sport and recreation to development, but this will not lead to open space creation and thus is not linked to visitation to international sites.</p> <p>As the policy is not related to development and no specific linkages with international sites are identified, it is concluded as having no likely significant effects.</p>
ENV 2: Enhancing nature	<p>The Policy states development must incorporate green and blue infrastructure and improve the ecological network, which may moderate / provide some mitigation for visitor pressure, but it is recognised that the moderating effects will be small and so they have been discounted from the screening assessment.</p> <p>Developments will be required to satisfy this policy at the project level, and as no specific linkages with international sites are identified, it is concluded as having no likely significant effects.</p>
ENV 3: Nature recovery	<p>Where development is sited within the nature network, it must demonstrate how it will protect and enhance the integrity of the ‘core areas’ and enhance the connectivity of the ‘opportunity areas’. This may moderate / provide some small contribution towards mitigation for visitor pressure.</p>

Policies	Screening rationale
	<p>Developments will be required to satisfy this policy at the project level, and as no specific linkages with international sites are identified, it is concluded as having no likely significant effects.</p>
<p>ENV 7: Environmental protection</p>	<p>Strictly, the policy is a 'no LSE' policy as it does not itself trigger development, although the policy includes 'mitigating' elements / criteria that would need to be met in relation to water discharges.</p> <p>As the policy is not related to development and no specific linkages with international sites are identified, it is concluded as having no likely significant effects.</p>
<p>ENV 8: Clean air</p>	<p>As above, the policy is a 'no LSE' policy as it does not itself trigger development, although the policy includes 'mitigating' elements / criteria that would need to be met in relation to air quality, but it is recognised that the moderating effects will be small and so they have been discounted from the screening assessment.</p> <p>Developments will be required to satisfy this policy at the project level, and as no specific linkages with international sites are identified, it is concluded as having no likely significant effects.</p>
<p>CR 3: Renewable and low-carbon energy development</p>	<p>The identification of areas as being suitable for photo-voltaic, hydropower and wind turbine developments may imply that this is based on a full range of strategic environmental considerations (e.g. effects on broad-front migration routes to SPAs and Ramsars); policy has a spatial component.</p> <p>Developments will be required to satisfy this policy at the project level, and as no specific linkages with international sites are identified, it is concluded as having no likely significant effects.</p>
<p>HOM1: Delivering new homes / HOM2a: New residential communities / HOM2b: Site-specific requirements / HOM8: Provision and enhancement of outdoor recreational space in new residential development / HOM14: Homes for agricultural workers in the Green Belt</p>	<p>Policies identifying the quantum of development and locations for this, including green space requirements. The policies have the potential to significantly affect European sites through effect pathways associated with the quantum of development, etc., and aspects of them need to be examined through appropriate assessment.</p> <p>Likely significant effects cannot be ruled out.</p>
<p>BUS 1: Economy and employment principles / BUS 2: Key employment locations / BUS 3a: Employment areas / BUS 3b: New employment development locations / BUS4: Employment uses outside of designated employment areas</p>	<p>Allocate land for employment; the policies have the potential to significantly affect European sites through effect pathways associated with the quantum of development, etc., and aspects of them need to be examined through appropriate assessment.</p> <p>The policies have the potential to significantly affect European sites through effect pathways associated with the quantum of development, etc., and aspects of them need to be examined through appropriate assessment.</p> <p>Likely significant effects cannot be ruled out.</p>

6.2 REVIEW OF SITE ALLOCATIONS

- 6.2.1. The allocation sites (housing or employment) proposed by SMBC have been reviewed to identify those which (if developed) could result in significant effects on an international site that are not obviously avoidable with the standard project-level measures that would be required to meet existing regulatory regimes. The assessment largely focuses on the identification of specific effects that might be associated with specific allocations (and which may therefore require the inclusion of allocation-specific mitigation within the plan) rather than the broader ‘quantum of development’ effects³⁸. The risk of effects is strongly dependent on how a particular development is implemented at the project stage, and in most cases, potential effects can be avoided using best-practice and standard scheme-level avoidance measures, which do not necessarily need to be specified for each allocation.
- 6.2.2. Virtually all of the allocations will have no significant effects alone due to their small size, the habitats affected, the absence of impact pathways, and their distance from the nearest International sites. There are minor residual uncertainties in relation to possible functional land associations for allocations east of Hazel Grove and around southern Woodford.

6.3 STAGE 1: SCREENING OF INTERNATIONAL SITES

- 6.3.1. International sites or qualifying features within a study area can be excluded from further assessment at an early stage in the assessment process (‘screened out’) if the plan or project will self-evidently have either ‘no effect’ or ‘no significant effect’ on these sites (i.e. the qualifying features are not sensitive to the environmental changes associated with the plan or project; or will not be exposed to those changes due to the absence of any reasonable impact pathways; or, if both exposed and sensitive, the effects of the environmental changes will clearly be inconsequential to the achievement of the conservation objectives).
- 6.3.2. The following sections provide a brief summary of the screening of the international sites and their qualifying features based on the baseline data summarised in Section 3 and the policies and proposals of the draft Local Plan. It should be noted that this aspect of the screening process is based on the precautionary approach, with sites, aspects or features only ‘screened out’ if they will self-evidently be unaffected by the Local Plan (i.e. it is aiming to identify those aspects that will clearly have ‘no effect’ or ‘no significant effect’ (alone or in combination) due to an absence of impact pathways). It does not attempt a detailed quantification if significant effects via particular pathways cannot be simply or self-evidently excluded (this is completed at an ‘appropriate assessment’ stage, when mitigation is also accounted for).
- 6.3.3. When screening it is appropriate to assume that all relevant lower-tier consents and permissions (etc.) will be correctly assessed and controlled, and that any activities directly or indirectly supported by the Local Plan will adhere to the relevant legislative and regulatory requirements and all normal best-practice (e.g. it would be inappropriate to assume that normal controls on, for example, the installation of a new discharge to a watercourse would not be correctly followed). The screening also recognises that there are some aspects over which the Local Plan will have no control (e.g. agricultural practices).

³⁸ Effects due to the overall quantum of development are essentially a within-plan ‘in combination’ effect and are considered in relation to specific European sites in Section 4.3.

6.4 DIRECT HABITAT LOSS

- 6.4.1. There are no International sites contained either wholly or partially within SMBC. It can be concluded that direct habitat loss impacts from plan policies and allocated sites to sensitive ecological receptors within the international sites boundaries can be discounted. Indirect impacts resulting from development are discussed further below and comprise the basis of the assessment.

6.5 RECREATIONAL PRESSURE

- 6.5.1. Many International sites will be vulnerable to some degree of impact as a result of recreational pressure, although the effects of recreational pressure are complex and very much dependent on the specific conditions and qualifying features at each site. For example, some bird species are more sensitive to disturbance associated with walkers or dogs than others; some habitats will be more sensitive to trampling or mechanical disturbance than others; some sites will be more accessible than others.
- 6.5.2. The most typical mechanisms for recreational effects are through direct damage to habitats or disturbance of certain species. Damage will most often be accidental or incidental, but many sites are particularly sensitive to soil or habitat erosion caused by recreational activities and require careful management to minimise any effects (for example, through provision and maintenance of 'hard paths' (boardwalks, stone slabs, etc.) and signage to minimise soil erosion along path margins).
- 6.5.3. Disturbance of species due to recreational activities can also be a significant problem at some sites, although the relationship is highly variable and depends on a range of factors, including the species, the time of year and the scale, type and predictability of disturbance. Most studies have focused on the effects on birds, either when breeding or foraging. For example, a long-term monitoring project by Natural England on the Thanet Coast has found that turnstones (a shoreline feeding waterbird) are particularly vulnerable to disturbance from dogs, which interrupts their feeding behaviour and can prevent them from gaining sufficient body fat for overwintering or migration. Finney et al. (2005), meanwhile, noted that re-surfacing the Pennine Way significantly reduced the impact of recreational disturbance on the distribution of breeding Golden plover, by encouraging walkers to remain on the footpath.
- 6.5.4. In contrast, some species are largely unaffected by human disturbance (or even benefit from it), which can result in local or regional changes in the composition of the fauna. The scale, type and predictability of disturbance are also important; species can become habituated to some disturbance (e.g. noise), particularly if it is regular or continuous. Unpredictable disturbance is most problematic.
- 6.5.5. Most recreational activities with the potential to affect International sites are 'casual' and pursued opportunistically (e.g. walking, walking dogs, riding) rather than structured (e.g. organised group activities or trips to specific discrete attractions), which means that it can be difficult to quantify or predict either the uptake or the impacts of these activities on International sites and (ultimately) harder to control or manage effects. It also means that it is difficult to explore in detail all of the potential aspects of visitor pressure at the strategy level. However, it is possible for plans and strategies to influence recreational use of International sites through the planning process, for example, by increasing the amount of green space required within or near developments if potentially vulnerable International sites are located nearby.

Table 6-3 - Summary of International site screening in relation to visitor pressure

Site	Notes	Screen in (YES / NO)
South Pennine Moors SAC	The SAC is approximately 2.75km outside of the SMBC eastern boundary and 6.7km from the nearest allocated site. Recreational pressure is included as a threat to achieving future positive conservation objectives (within the SIP).	Yes
Peak District Moors (South Pennine Moors Phase 1) SPA	The SPA is approximately 2.75km outside of the SMBC eastern boundary and 6.7km from the nearest site allocation. Recreational pressure is included as a threat to achieving future positive conservation objectives (within the SIP).	Yes
Rochdale Canal SAC	The SAC is approximately 5.6km outside of the SMBC northern boundary and the nearest allocated site. Recreational pressure is not listed as a pressure or threat to achieving future positive conservation objectives (within the SIP).	No
Rostherne Mere Ramsar	The Ramsar is approximately 8.8km outside of the SMBC southwest boundary. Recreational pressure is not listed as a pressure or threat to achieving future positive conservation objectives (within the Evidence Plan), and there is no public access to the vast majority of the site; therefore, the SMBC plan will not have significant effects on this site due to changes in recreational pressure, alone or in combination.	No
Midland Meres & Mosses - Phase 1 Ramsar	The Ramsar is approximately 9.4km outside of the SMBC southwest boundary and the nearest allocated site. Recreational pressure is listed as a pressure or threat to achieving future positive conservation objectives (within the Evidence Plan). However, the 16 mere sites, comprising over 60 open waters, are geographically spread out and some have little or no public access. The Ramsar Information Sheet (UK11043) states “no major tourism or recreational use apart from some angling and boating and motor sports (water-skiing) in one or two cases”, therefore, the SMBC plan will not have significant effects on this site due to changes in recreational pressure, alone or in combination.	No

EFFECTS ON FUNCTIONAL HABITATS OR SPECIES AWAY FROM INTERNATIONAL SITES

- 6.5.6. The provisions of the Habitats Regulations ensure that ‘direct’ (encroachment) effects on International sites as a result of land use change (i.e. the partial or complete destruction of an international site) are extremely unlikely under normal circumstances, and this will not occur as a result of the Local Plan. However, many European qualifying features (particularly more mobile animal species) may use or be reliant on non-designated habitats outside of an international site

during their life cycle. Developments some distance from an international site can therefore have an effect on the site if its population of qualifying features is reliant on the habitats being affected by a development, and sufficient numbers are exposed to the environmental changes. As with other aspects, in this instance, recreation can therefore also affect International site integrity indirectly through effects on functional habitats outside of the designated site boundary.

- 6.5.7. With regard to the International sites within the study area, impact pathways from development to functionally linked habitats are significantly limited due to the separation distances to the International sites, all of which are outside of the SMBC boundary. The locations of allocated sites are also mostly located away from potential functionally linked habitat features, with a general lack of open water and large expanses of agricultural landscape favoured by wintering birds.
- 6.5.8. It is likely that waterbirds associated with Rostherne Mere and Midland Meres & Mosses Ramsars periodically use other wetland sites in the region, but these lie to the east of SMBC, and there is no data to suggest a potentially significant functional linkage or dependency.
- 6.5.9. However, it is recognised that some areas of cropped lowland farmland may be important for certain wintering waterbirds typically associated with coastal and wetland SPAs (e.g. Mason & MacDonald 1999; Gillings 2003), and that this behaviour is under-recorded by the standard Wetland Bird Survey (WeBS) monitoring technique.
- 6.5.10. The 2016 SPA Review (JNCC, 2016) identifies a broad group of species that are known to be associated with or reliant on cropped habitats, which are under-represented in the SPA network (although the SPA Review suggests that this should be addressed outside the SPA Review process through “wider countryside measures to preserve and promote permanent pasture as feeding and roosting habitat for the species”). Of the species identified in the International sites citations, only merlin, golden plover and short-eared owl have potential associations with cropped habitats. All three species are identified as designation features of Peak District Moors (South Pennine Moors Phase 1) SPA.
- 6.5.11. Merlin and short-eared owl utilise cropped habitats as hunting grounds. Whereas golden plover will use arable fields for foraging on grass seeds, berries and invertebrates. All three species are more closely associated with grassland and moorland than with intensively managed agriculture and have a preference for upland heath over arable land for nesting. (JNCC 2016). Feeding fidelity for short-eared owl is very low; moderate for merlin and high for golden plover, with the latter more greatly utilising arable fields for foraging.
- 6.5.12. With regard to flyways for birds using the International sites, specific routes or corridors have not been identified. The RSPB provided a high-level map and guidance³⁹ in 2009 that assigned one of three sensitivity ratings (high, medium or unknown) to each 1km square in England; for the International sites assessed here, the landscape within ~4 – 5km of the SPA and Ramsar sites was categorised as having an ‘unknown’ sensitivity to wind farm development. Generally, further evidence is required to provide a more complete picture of potential impacts to birds from wind turbines, but the geographical layout of SMBC means it is generally unsuitable for large-scale wind farms.

³⁹ Bright J.A., Langston R.H.W. & Anthony S. (2009). Mapped and written guidance in relation to birds and onshore wind energy development in England. RSPB Research Report No. 35. RSPB, Beds.

Table 6-4 - Summary of International site screening in relation to functionally linked habitats

Site	Notes	Screen in?
South Pennine Moors SAC	The SAC is not designated for breeding or wintering species, meaning the SMBC plan will not have significant effects on this site due to changes in functionally linked habitat alone or in combination.	No
Peak District Moors (South Pennine Moors Phase 1) SPA	The SPA is designated for breeding golden plover, with arable fields in proximity to allocated sites providing suitable foraging habitat.	Yes
Rochdale Canal SAC	The SAC is not designated for breeding or wintering species, meaning the SMBC plan will not have significant effects on this site due to changes in functionally linked habitat alone or in combination.	No
Rostherne Mere Ramsar	The Ramsar is approximately 8.8km outside of the SMBC southwest boundary and the nearest allocated site. Allocated sites located nearest to the Ramsar are adjacent to existing development and Manchester Airport. The separation distance from the Ramsar and SMBC boundary means the SMBC plan will not have significant effects on this site due to changes in functionally linked habitat alone or in combination.	No
Midland Meres & Mosses - Phase 1 Ramsar	The Ramsar is approximately 9.4km outside of the SMBC southwest boundary and the nearest allocated site. Allocated sites located nearest to the Ramsar are adjacent to existing development and Manchester Airport. The separation distance from the Ramsar and SMBC boundary means the SMBC plan will not have significant effects on this site due to changes in functionally linked habitat alone or in combination.	No

AIR QUALITY SCREENING METHODOLOGY

- 6.5.13. As part of the screening assessment, consideration is given to the air quality sensitivities of identified international sites, and specifically the sensitivity of their qualifying features to:
- Changes in both nitrogen oxides (NO_x) and ammonia (NH₃) concentrations in relation to the relevant Critical Levels; and
 - Changes in nitrogen deposition (N Dep) in relation to the relevant Critical Levels and Critical Loads.
- 6.5.14. Critical Loads and Levels are metrics used for assessing the risk of air pollution impacts to sensitive vegetation and ecosystems.
- 6.5.15. **Table 6-5** therefore, provides a summary of the screening in relation to air quality impacts and known threats and pressures on these sites. **Table 6-6** summarises the International sites (and component SSSIs) that are situated within 10.7km of SMBC's administrative boundary and within 200m of a main road.

Table 6-5 - Summary of International sites screening in relation to air quality impacts and known threats and pressures on these sites

Site	Approx. Distance/ orientation from Borough Boundary (km)	Are air pollution identified as pressures or threats in the Site Improvement Plan?	Notes	Screen in?
Peak District Moors (South Pennine Moors Phase 1) SPA	2.9km northeast	Air Pollution: Impact of atmospheric nitrogen deposition (Pressure)	Site sensitive to air quality changes; A628, A537, A624 and B6105 within 200m	Yes
South Pennine Moors SAC	2.9km northeast	As per the South Pennine Moors SPA	As per the South Pennine Moors SPA	Yes
Rochdale Canal SAC	5.6km north	Air Pollution: Impact of atmospheric nitrogen deposition (Pressure)	Site sensitive to air quality changes; M60, A62, A6104, A663, A664 and B6195 within 200m.	Yes
Rostherne Mere Ramsar	8.9km southwest	-	Site sensitive to air quality changes; A556 within 200m	Yes
Midland Meres & Mosses - Phase 1 Ramsar	9.5km southwest	-	Site sensitive to air quality changes; B5085 within 200m	No – As there are no major roads nearby, the closest is the B5085, which is 160m away.
Manchester Mosses SAC	15.7km	Air Pollution: Impact of atmospheric nitrogen deposition (Pressure)	Site sensitive to air quality changes; M62 within 200m.	Yes

Table 6-6 - International sites (and component SSSIs) within 10.7km of the SMBC area with main roads within 200m

International site(s)	Relevant SSSIs and A roads
South Pennine Moors SAC and Peak District Moors (South Pennine Moors Phase 1) SPA	Dark Peak (SSSI) – A628 in Tintwistle
South Pennine Moors SAC and Peak District Moors (South Pennine Moors Phase 1) SPA	Goyt Valley (SSSI) and Leek Moors (SSSI) – A537 in Macclesfield
Rostherne Mere Ramsar	Rostherne Mere (SSSI)
Manchester Mosses SAC	Astley & Bedford Mosses SSSI, Holcroft Moss SSSI, Risely Moss SSSI

6.5.16. The following SSSIs have been identified as component features of the International sites screened into this assessment (Table 6-6). However, further assessment of SSSIs will take place within the associated Conditions Assessment at Regulation 19. Therefore, SSSIs have not been assessed further at this stage.

AIR QUALITY INPUT TO HRA SCREENING

Critical levels for NO_x and NH₃

6.5.17. The screening exercise presented above identifies International sites within the Zol that may be sensitive to air quality impacts. This combined evidence base supports the identification of potential pathways of effect from Local Plan development, including:

- Air pollution: Impact of atmospheric nitrogen deposition (SACs/SPAs) on Ramsar sites through nutrient enrichment

6.5.18. The extent of these impacts is assessed using critical loads and levels.

6.5.19. Critical Levels are used to estimate the exposure of sensitive vegetation and ecosystems to some important airborne pollutants, below which significant harmful effects are not expected to occur. These levels have been adopted by the European Union and the United Nations Economic Commissions for Europe (UNECE) and are used as regulatory standards and are expressed in units of µg/m³ (micrograms per cubic metre).

6.5.20. Critical Levels are not habitat specific, as with Critical Loads, but have been set to cover broad vegetation types. For nitrogen oxides (NO_x), the Critical Levels are 30µg/m³ for annual mean concentrations and 75µg/m³ for 24-hour mean concentrations, regardless of habitat type. For NH₃, there are two values relevant to annual mean concentrations, 1µg/m³, typically applied where lichens and bryophytes are present (and form a key part of the ecosystem integrity), which are particularly sensitive to changes in NH₃, and another 3µg/m³ (with an uncertainty range of 2 – 4µg/m³) for all remaining vegetation

CRITICAL LOADS

6.5.21. In addition to the direct effect of pollutant concentrations in the air, vegetation can also be affected by the deposition of pollutants and particles onto both the ground and vegetation. Close to roads, nitrogen deposition can be of concern for sensitive ecological sites as it can result in a variety of

adverse effects depending on the habitats present (e.g. interfering with photosynthesis, increasing acidification, altering species composition etc).

- 6.5.22. When considering the effects of nitrogen deposition from the air onto habitats and vegetation, the relevant assessment benchmarks are known as ‘Critical Loads’. Critical Loads are defined as:
- “...a quantitative estimate of exposure to one or more pollutants below which significant harmful effects on specified sensitive elements of the environment do not occur according to present knowledge”.*
- 6.5.23. In the UK, Critical Loads have been established for a wide range of habitats and vegetation types, reflecting the variation in ecosystem responses. Details of the Critical Loads relevant to a specific habitat or designated site (SACs and SPAs) are available from the APIS website. For the Rostherne Mere Ramsar site, relevant nitrogen deposition data is referenced from the respective High-Speed two (HS2) Environmental Statement⁴⁰, as agreed with the Project Ecologist. In relation to Critical Loads, N Dep is expressed in units of kilograms of nitrogen per hectare per year (Kg/N/ha/yr).
- 6.5.24. A summary of the relevant Critical Levels and Critical Loads for the identified international sites is provided in **Table 6-7**.

⁴⁰ HS2 (2022). *Document to inform a Habitats Regulations Assessment for the Habitats Regulations Assessment for Rostherne Mere Ramsar site and Midland Meres and Mosses Phase 1 Ramsar site.* Available at: <https://assets.publishing.service.gov.uk/media/61f001c7e90e07037eb683d5/M139.pdf>

Table 6-7 - Critical levels and critical loads for nutrient nitrogen component at identified international sites

International Sites	Features	Critical Load / Critical Level - Nutrient N component				Current (2021)		
		Total N Deposition (kg/N/ha/yr)	Ammonia (µg/m ³)	NO _x (µg/m ³)	SO ₂ (µg/m ³)	N Deposition kg N/ha/yr	NH ₃ Concentration µg/m ³	NO _x (µg/m ³)
South Pennine Moors Special Areas of Conservation (SAC)	H7130 Blanket bogs	5 - 10	1	30	10	For moorland: Maximum: 23.2 Minimum: 16.3 Average: 19.3	Maximum: 1.8 Minimum: 0.6 Average: 0.9	Maximum: 14.6 Minimum: 5.6 Average: 7.3
	H4030 European dry heaths	5 - 15	1		10			
	H4010 Northern Atlantic wet heaths with Erica tetralix	5 - 15	1		10			
	H7140 Transition mires and quaking bogs	5 - 15	1		20			
	H91A0 Old sessile oak woods with Ilex and Blechnum in the British Isles	10 - 15	1 or 3		10-20			
Peak District Moors (South)	A222(B) Asio flammeus	5 - 15	-	-	-	For moorland:	Maximum: 1.8	Maximum: 11.1

International Sites	Features	Critical Load / Critical Level - Nutrient N component				Current (2021)		
		Total N Deposition (kg/N/ha/yr)	Ammonia (µg/m³)	NO _x (µg/m³)	SO ₂ (µg/m³)	N Deposition kg N/ha/yr	NH ₃ Concentration µg/m³	NO _x (µg/m³)
Pennine Moors Phase 1) Special Protection Area (SPA)	A098(B) <i>Falco columbarius</i>	5 - 15				Maximum: 23.2 Minimum: 16.6 Average: 19.9	Minimum: 0.6 Average: 0.9	Minimum: 5.8 Average: 7.1
	A140(B) <i>Pluvialis apricaria</i> [North-western Europe]	5 - 10						
Rochdale Canal SAC	S1831 <i>Luronium natans</i>	2 - 10	3	30	10-20	Moorland (precautionary approach): Maximum: 18.5 Minimum: 17.2 Average: 17.7	Maximum: 1.4 Minimum: 1.1 Average: 1.3	Maximum: 29.2 Minimum: 12.5 Average: 19.6
Rostherne Mere Ramsar	Fen, marsh and swamp and standing open water	For poor fen: 10 - 15kg/N/ha/yr*	-	30	-	-	-	-
Manchester Mosses SAC	H7120 Degraded raised bogs still capable of natural regeneration	5-10	1	30	10	Moorland: Maximum: 18.6	Maximum: 2.2 Minimum: 1.5 Average: 1.8	Maximum: 18.1 Minimum: 13.8 Average: 14.9

International Sites	Features	Critical Load / Critical Level - Nutrient N component				Current (2021)		
		Total N Deposition (kg/N/ha/yr)	Ammonia ($\mu\text{g}/\text{m}^3$)	NO_x ($\mu\text{g}/\text{m}^3$)	SO_2 ($\mu\text{g}/\text{m}^3$)	N Deposition kg N/ha/yr	NH_3 Concentration $\mu\text{g}/\text{m}^3$	NO_x ($\mu\text{g}/\text{m}^3$)
						Minimum: 16.6 Average: 17.6		

*These thresholds are presented as a precautionary approach; only the lowest value is used (unless there are compelling reasons to do otherwise), as this emphasises any potential negative outcomes

SUMMARY OF DISCUSSION ON AIR QUALITY PRESSURES AND THREATS

6.5.25. The screening exercise has considered the high-level pressures and threats to each site as set out in **Table 6-5** and based on published research and reports for individual sites. This is presented in **Table 6-8** below.

Table 6-8 - Discussion of Identified Pressure and Threats (relative to air quality)

Pressure/threat	International sites concerned	Discussion
Air pollution: impact of atmospheric nitrogen deposition	South Pennine Moors SAC and Peak District Moors (South Pennine Moors Phase 1) SPA	<p>N Deposition currently exceeds the site-relevant Critical Loads. This is supported by the latest data from APIS, as summarised in Table 6-5.</p> <p>Background concentrations of NO_x and NH₃ fall below the respective critical levels, as summarised in Table 6-5.</p> <p>Whilst no traffic data was available for review as part of this screening assessment, the SAC is located 2.9km northeast of the SMBC boundary, at its nearest point, and is therefore within the identified Zol of the borough boundary and could be affected by the proposed site allocations.</p>
	Rochdale Canal SAC	<p>N Deposition currently exceeds the site-relevant Critical Loads. This is supported by the latest data from APIS, as summarised in Error! Reference source not found.</p> <p>Background concentrations of NO_x and NH₃ fall below the respective critical levels, as summarised in Table 6-5.</p> <p>Whilst no traffic data was available for review as part of this screening assessment, the SAC is located 5.6km north of the SMBC boundary, at its nearest point, and is therefore within the identified Zol of the borough boundary and could be affected by the proposed allocations.</p>
	Rostherne Mere Ramsar	<p>The site is currently in an unfavourable condition due to nutrient pressures from nitrogen and phosphorus.</p> <p>Whilst no traffic data was available for review as part of this screening assessment, the Ramsar is located 8.9km southwest of the SMBC boundary, at its nearest point, and is therefore within the identified Zol of the borough boundary and could be affected by the proposed allocation. The distance does suggest that a reasonable degree of distribution of traffic over the local network is likely to occur between the proposed allocations and the Habitats site.</p>
	Manchester Mosses SAC	<p>N Deposition currently exceeds the site-relevant Critical Loads. This is supported by the latest data from APIS, as summarised in Table 6-5.</p> <p>As shown in Table 6-5, background concentrations of NO_x fall below the respective critical levels. However, background concentrations of NH₃ exceed the respective critical levels.</p> <p>Whilst no traffic data was available for review as part of this screening assessment, the SAC is located 15.7km northwest of the SMBC boundary, at its nearest point.</p>

- 6.5.26. As described in Section 0, NO_x contributions from vehicles have been declining over recent years and are projected to decrease substantially over the Local Plan period due to the transition to electric vehicles. This shift is expected to result in a corresponding reduction in background nitrogen deposition rates from road traffic.
- 6.5.27. In line with IAQM guidance (2020), it is appropriate to incorporate allowances for these expected background air quality improvements into assessments. However, this assumption should be revisited once traffic model data becomes available. Therefore, at this stage, the potential for likely significant effects on International sites cannot be ruled out.

INCORPORATED MITIGATION

- 6.5.28. The promotion of sustainable development, including transport, is embedded throughout the Draft Local Plan. A range of policies contribute to this objective, addressing health and well-being, climate resilience, energy efficiency, infrastructure, and mobility. Relevant policies include:
- COM 1: Healthy and active across all ages
 - CR 1: Climate resilience, mitigation and adaptation
 - CR 2: Energy efficiency, resources and carbon
 - CR 3: Renewable and low-carbon energy development
 - CR 4: Heat networks and cooling
 - CR 5: Retrofit and re-use of buildings
 - BUS 1: Economy and employment principles
 - INF 1: Infrastructure provision and developer contributions
 - INF 2: Digital and telecommunications infrastructure
 - INF 7: Integrated transport network
 - INF 8: Sustainable streets
 - INF 9: Walking, wheeling and cycling
- 6.5.29. These policy measures will help to moderate the environmental impacts of the Local Plan. However, they are unlikely to fully mitigate or offset potential changes in air quality.

AIR QUALITY RECOMMENDATIONS

- 6.5.30. The conclusions in relation to air quality are preliminary only and subject to review once appropriate transport model data is available, presumably at the Regulation 19 stage. The mitigating policies within the plan will also be reviewed at this point, as required.

7 SUMMARY AND CONCLUSIONS

7.1 SUMMARY

Stockport Metropolitan Borough Council (SMBC) is currently reviewing its Local Plan. The new Local Plan will set out the vision, spatial principles, planning policies and site allocations that will guide development in the local authority area in the period up to 2041.

The Council is currently consulting on the emerging Local Plan. In broad terms, the emerging Local Plan includes:

- Provision for 31,000 homes over the plan period (the quantum of growth).
- Policies providing geographical direction for development (typically specific housing and minerals site allocations, but also implicit location preferences for certain activities or sectors prescribed through (for example) areas of search).
- Policies broadly supporting development or other changes, but which do not specify a quantum or location.
- Various development control policies that set out SMBC's tests or expectations when considering proposals, such as safeguarding policies, environmental protection policies or policies relating to design or other qualitative criteria.

7.1.1. Regulation 105 of the Habitats Regulations states that if a land-use plan is “(a) *is likely to have a significant effect on an international site or a European offshore marine site (either alone or in combination with other plans or projects); and (b) is not directly connected with or necessary to the management of the site*” then the plan-making authority must “...make an appropriate assessment of the implications for the site in view of that site’s conservation objectives” before the plan is given effect. The process by which Regulation 105 is met is known as HRA. An HRA determines whether there will be any ‘likely significant effects’ (LSE) on any International site as a result of a plan’s implementation (either on its own or ‘in combination’ with other plans or projects) and, if so, whether these effects will result in any adverse effects on the site’s integrity. The Council has a statutory duty to prepare the Local Plan and is therefore the Competent Authority for an HRA.

7.1.2. There is no statutory requirement for HRA to be undertaken on draft plans or similar developmental stages (e.g. issues and options; preferred options). However, it is accepted best practice for the HRA of strategic planning documents to be run as an iterative process alongside plan development, with the emerging policies or options reviewed during development to ensure that potentially adverse effects on International sites can be identified at an early stage and avoided or mitigated through the plan development process.

7.1.3. This report therefore accompanies the Preferred Options (Regulation 18) plan that is being published for consultation. **It does not constitute a final ‘HRA Screening’** as the plan is still in development and so any screening or appropriate assessment conclusions would be premature; however, the principles of HRA are applied to Preferred Options to (a) provide an initial assessment of the likely HRA conclusions, were the plan adopted as currently drafted and (b) identify additional data requirements and/or additional measures that may be required to ensure that the Submission Draft Plan (Regulation 19) has no adverse effects on any international sites.

- 7.1.4. The assessment completed to date indicates that the vast majority of the emerging Local Plan policies and proposed site allocations will have 'no effect' (either alone or in combination) on any International sites, typically because either they are policy types that do not make provision for changes or because they relate to sites that are a considerable distance from the International sites (with no known pollutant or effect pathway).
- 7.1.5. There will be either no effects or no significant effects alone or in combination on the qualifying features of Midland Meres & Mosses (Phase 1) Ramsar. This is principally due to the absence of reasonable impact pathways by which the Local Plan could affect these sites.
- 7.1.6. The screening indicated that qualifying features of five international sites, South Pennine Moors SAC, Rochdale Canal SAC, Peak District Moors (South Pennine Moors Phase 1) SPA, Rostherne Mere Ramsar and Manchester Mosses SAC may be exposed and sensitive to environmental changes associated with the Local Plan, principally in relation to the cumulative effects of visitor pressure and air quality affecting the site itself. Some qualifying features may also be exposed to development-related effects when utilising habitats away from the site.
- 7.1.7. None of the allocations is likely to result in significant effects alone. The separation distance between site allocation locations and International sites ensures that exposure to potentially significant environmental changes is likely to be limited; however, there is a residual uncertainty in relation to the significance of some effects, and the Preferred Draft Local Plan includes measures identified during its development that are intended to minimise or prevent significant or significant adverse effects occurring.
- 7.1.8. These aspects must therefore be examined through an 'appropriate assessment' stage to ensure that proposals coming forward under the Local Plan either avoid affecting designated sites entirely (no significant effect) or will not adversely affect site integrity where potential effect pathways remain. Site integrity (in HRA terms) is "the coherent sum of the site's ecological structure, function and ecological processes, across its whole area, which enables it to sustain the habitats, complex of habitats and/or populations of species for which the site is designated" (EC Guidance 'Managing Natura 2000' (2018)).

7.2 CONCLUSIONS

- 7.2.1. Overall, the assessment of the emerging Local Plan has concluded that likely significant effects from air quality impact pathways cannot be discounted, South Pennine Moors SAC, Peak District Moors (South Pennine Moors Phase 1) SPA, Rochdale Canal SPA, Rostherne Mere Ramsar and Manchester Mosses SAC. Likely significant effects through recreational pressure impacts also cannot be ruled out for the South Pennine Moors SAC and Peak District Moors (South Pennine Moors Phase 1) SPA.
- 7.2.2. Appropriate assessments for each of the international sites are required under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 to provide additional analyses and data to resolve uncertainties present at the initial screening and to conclude that (as currently drafted) the Preferred Options Local Plan will have no adverse effects on the integrity of South Pennine Moors SAC, Peak District Moors (South Pennine Moors Phase 1) SPA, Rochdale Canal SPA, Rostherne Mere Ramsar and Manchester Mosses SAC, alone or in combination.

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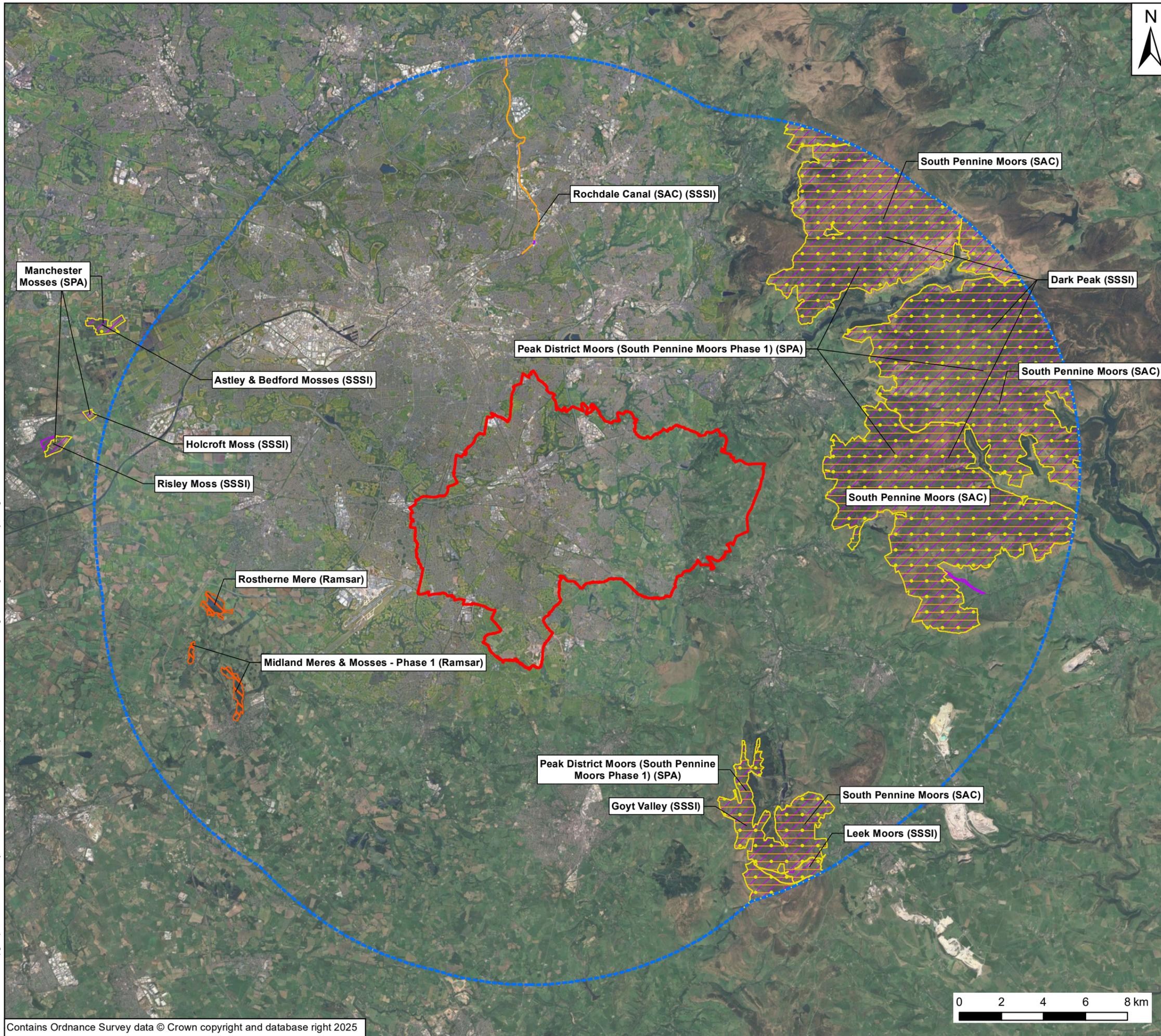
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FIGURES

Figure 1 – Statutory designated sites within 15km of Stockport Metropolitan Borough Council boundary



Key	
	Stockport Borough Boundary
	15km Survey Area
	Special Areas of Conservation (SAC)
	Special Protection Areas (SPA)
	Ramsar Sites
	Sites of Special Scientific Interest (SSSI)



Client:	Stockport Metropolitan Borough Council	
Project:	Stockport Local Plan SA	
Title:	Statutory Designated Sites within 15km	
Drawing No:	Figure 1	Drawn: NG
Date:	16/10/2025	Checked: DF
Scale:	175,000	Approved: DF



Appendix A

HRA POLICY GUIDANCE



HRA POLICY GUIDANCE

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Appendix B

REVIEW OF PLANS FOR 'IN COMBINATION' EFFECTS



Table A-1 presents the review of plans for in-combination effects with the Local Plan; note that this review is preliminary as several plans (including neighbouring local plans) are in the process of being updated and so will require further review prior to the Submission Draft HRA.

Plan	Summary	Plan HRA conclusions	Potential for i/c effects?	Notes / Assessment
<p>Greater Manchester Joint Plan (Places for Everyone (PfE) Councils) 2022 - 2039</p>	<p>Sets out the development strategy, policies and proposals, including site allocations, which will guide land use and development in the Borough up to 2039. Includes provision for 54,000 homes.</p>	<p>No adverse effects</p>	<p>Yes</p>	<p>The Greater Manchester Joint Plan Local Plan HRA includes specific reference to impacts upon South Pennine Moors SAC, Peak District Moors (South Pennine Moors Phase 1) SPA and South Pennine Moors Phase 2 SPA. It concludes that there will be adverse effects that cannot be ruled out, both alone and in combination.</p> <p>With regard to the SMBC plan, while individual allocations in the SMBC and PfE plans will not interact to affect international sites, they will both contribute to the overall quantum of development regionally, which has the potential to significantly affect the South Pennine Moors SAC and Peak District Moors SPA through 'in combination' effects on air quality and visitor pressure. The SMBC HRA demonstrates that likely significant effects 'in combination' cannot be ruled out through these mechanisms (see Section 4).</p>
<p>Cheshire East 2010 - 2030</p>	<p>Sets out the development strategy, policies and proposals, including site allocations, which will guide land use and development in the Borough up to 2030. Includes provision for 36,000 homes.</p>	<p>No significant effects</p>	<p>No</p>	<p>The Cheshire East Local Plan HRA concludes that there will be no significant effects alone or in combination with any international sites, although this appears to depend on the inclusion of mitigation within the policies, which may not be consistent with 'People over Wind'. Notwithstanding this, individual allocations in the SMBC and CEDC plans will not interact to affect International sites, although they will both contribute to the overall quantum of development regionally, which has the potential to significantly affect International sites through 'in combination' effects on air quality and visitor pressure. The SMBC HRA demonstrates that likely significant effects 'in combination' cannot be ruled out through these mechanisms (see Section 4).</p>

Plan	Summary	Plan HRA conclusions	Potential for i/c effects?	Notes / Assessment
Staffordshire Moorlands 2014 - 2033	Sets out the development strategy, policies and proposals, including site allocations, which will guide land use and development in the Borough up to 2033. Includes provision for 6,080 homes.	No significant effects	No	The Staffordshire Moorlands Local Plan HRA concludes that there will be no significant effects alone or in combination with any international sites, although this appears to depend on the inclusion of mitigation within the policies, which may not be consistent with 'People over Wind'. Notwithstanding this, individual allocations in the SMBC and SMDC plans will not interact to affect International sites, although they will both contribute to the overall quantum of development regionally, which has the potential to significantly affect International sites through 'in combination' effects on air quality and visitor pressure. The SMDC Local Plan HRA calculates that, based on visitor survey usage, the increase in visitation from residents across the entirety of the Peak District National Park would equate to 0.019% of current visitor days to the park per year. The SMBC HRA demonstrates that no likely significant effects are expected in combination from SMBC and SMDC (see Section 4).
High Peak 2011 - 2031	Sets out the development strategy, policies and proposals, including site allocations, which will guide land use and development in the Borough up to 2031. Includes provision for 7,000 homes.	No significant effects	No	The High Peak Local Plan HRA concludes that there will be no significant effects alone or in combination with any international sites, although this appears to depend on the inclusion of mitigation within the policies, which may not be consistent with 'People over Wind'. Notwithstanding this, individual allocations in the SMBC and HPBC plans will not interact to affect International sites, although they will both contribute to the overall quantum of development regionally, which has the potential to significantly affect international sites through 'in combination' effects on air quality and visitor pressure. The HPBC Local Plan HRA contains housing provision similar to that of Staffordshire Moorlands, and as such, an insignificant contribution to any increase in visitor numbers at the international sites. The SMBC HRA demonstrates that no likely significant effects are expected in combination from SMBC and SMDC (see Section 4).



Plan	Summary	Plan HRA conclusions	Potential for i/c effects?	Notes / Assessment
Upper Mersey Catchment Flood Management Plan (CFMP)	An overview of the flood risk in the Upper Mersey catchment and sets out our preferred plan for sustainable flood risk management over the next 50 to 100 years.	No significant effects	No	A key aspect of a CFMP is to influence policy delivery plans, such as Local Plans. This is aimed at reducing flooding risk, promoting good land management and habitat protection/creation. These measures are indirectly positive in relation to South Pennine Moors SAC and Peak District Moors SPA, both of which drain into the catchment. As a result, the CFMP will have no negative effect on international sites and is discounted from any in-combination effect.



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