

Natural England Comments on Draft HRA Screening Report of LTP3

Detailed Comments

<p>Table Page 13 Knot is not a qualifying species of the Northumbria Coast Special Protection Area (SPA). In addition, the SPA does not qualify due to an internationally important assemblage of over-wintering wildfowl.</p>	<p>Noted and changed. Incorrect inclusion came from having taken information from the Durham Coast SSSI information sheet, which includes sections in Northumbria Coast SPA and Teesmouth & Cleveland Coast SPA. Knot and assemblages of overwintering wildfowl are qualifying species for the latter.</p>
<p>Following the 2001 SPA Review, ringed plover (on passage) is now also a qualifying feature of the Teesmouth and Cleveland Coast SPA (http://www.jncc.gov.uk/default.aspx?page=1993)</p>	<p>Noted and changed.</p>
<p>Table Page 22 – 23 – Would recommend using ‘fauna’ rather than ‘Animal / bird / insect species’.</p>	<p>Noted – and suggested wording would be more accurate, but consider wording used is more commonly understood.</p>
<p>5.0 Screening Analysis of Draft LTP3</p>	
<p>5.2) Table Page 26 – 35 General – Where policies have been ‘screened out’ for likely significant effect (i.e. Policy 1) a reasoned justification should be provided and it should also be clearly stated that appropriate assessment will not be required. In relation to Policy 1 for example, it could be stated that no adverse affect will arise as the Policy does not in itself promote development.</p>	<p>Noted and reasoned justification to be added</p>
<p>General – As well as providing details of broad impact pathways, it would be useful to detail the means by which each pathway could be affected by implementation of the policy. For example, with reference to Policy 3, under habitat destruction or fragmentation, new routes or road widening schemes would be relevant. Identifying the potential impacts associated with each policy at this stage will assist with the later assessment of likely significance (Page 55-61).</p>	<p>Noted and more detail with reference to specific policies to be added</p>
<p>6) Assessment of Likely Significance</p>	

<p>General - While the LTP has a 10 year life span, the delivery plan is a rolling three year programme. As such, a number of Policies (3,4,14,15) have been brought forward from Section 5.0 for assessment of likely significance where there are as yet no specific scheme proposals.</p> <p>As such, Natural England concur that effects on European Sites arising through implementation of these policies cannot be assessed by the LTP HRA in a meaningful way and that it would be more appropriate to rely on the HRA assessment of the individual plans / projects once the precise nature, scale and location of development is known. However, it would be useful at this stage to record potential impacts which may arise as a result of the implementation of each Policy and also which European Sites would be susceptible to adverse impacts. This would help to inform the development of the more detailed plans / projects as schemes likely to have an adverse affect on the integrity of European sites could be discounted at an early stage.</p>	<p>Noted More detail on potential impacts and potentially susceptible European sites to be added</p>
<p>Page 56-57 – Policy 5 – Although this policy refers specifically to bus travel, consideration has been given to the proposed improvements to Seaham Rail Station. The assessment of likely significance for this proposal would appear to sit more comfortably within Policy 8 – Passenger Rail.</p>	<p>Noted: Consideration of Seaham Rail Station to be included under Policy 8, not Policy 5</p>
<p>Notwithstanding the above, for both Peterlee bus station and Seaham rail station, it needs to be considered whether the works would increase accessibility to the European Sites and, if so, whether this would be likely to result in a significant effect.</p>	<p>Consideration of potential increase in accessibility and likely significance of effect to be included</p>
<p>Page 57 - Policy 8</p>	
<p>One of the key outcomes of this policy is the provision of a new station on the Durham Coast line. While it is stated that there is currently no information about the location, scale and design of the development, Paragraph 4.8.3 of the Durham LTP3 Appendices document indicates that the location will be either Easington Colliery or Horden. While appreciating that insufficient detail exists at the present time to undertake an assessment of likely significant effect,</p>	<p>Consideration of potential impacts on Durham Coast SAC to be included to help inform development of proposals for the new station on the Durham Coast Line.</p>

<p>consideration of the likely impact on European Sites, and specifically the Durham Coast SPA, should be used to help inform the final location / scale of the development. The station will need to be in a location where it can be demonstrated that there will be no adverse effects on international sites.</p>	
<p>Consideration needs to be given to potential impacts arising through the reopening of the Leamside Line (disturbance, air pollution etc.) and whether this would lead to a likely significant effect on any European sites. It would also be useful to provide a map showing the location of the line and its geographical relationship with the European sites.</p>	<p>Map of the Leamside Line in relation to European Sites to be produced and potential impacts of its re-opening considered.</p>
<p>Page 58/59 – Policy 14 & 15</p>	
<p>These policies relate to the development of the pedestrian and cycle networks respectively. In both cases no specific improvement measures are defined in the three year programme with policy implementation assessed as having '<i>no likely significant impact</i>' on the basis that it will be ensured that '<i>works on routes that traverse natural 2000 sites or other areas utilised by designated Natura 2000 bird species are informed by expert ecological advice</i>'. However, potential impacts are not limited to disturbance of SPA birds. Depending on the nature / location / scale of future proposals potential impacts could, amongst others, include habitat loss / fragmentation and air and water quality issues. As such a caveat needs to be added that any proposals which cannot clearly demonstrate no adverse impact on the integrity of a European Site will need to be subject to a separate HRA.</p>	<p>Noted.</p> <p>Text changed to show clearly that HRA will be required where proposals cannot demonstrate no impact on the integrity of a European Site</p>