



**PARTNERSHIP PLAN REVIEW**

**HABITATS REGULATIONS ASSESSMENT**  
**(HRA)**

**SCREENING REPORT: DRAFT**

**December 2024**

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# EXMOOR NATIONAL PARK AUTHORITY PARTNERSHIP PLAN REVIEW 2025-2030

## Habitats Regulations Assessment

### HRA Screening Report: DRAFT

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## 1.0 CONTEXT

### The Exmoor National Park Partnership Plan (ENPPP) Review 2025-2030

- 1.1 National Park Authorities are required<sup>1</sup> to produce a plan for the management of their Park and for the carrying out of its functions. Exmoor National Park Authority (ENPA) is undertaking a review<sup>2</sup> of the Partnership Plan for the Exmoor National Park. The review of this management plan is to identify key issues and opportunities, and the focus for partnership action over the next 5 years. A draft Plan will be produced and there will be a public consultation before the ENPPP is formally adopted by the ENPA – anticipated in 2025.
- 1.2 Fundamental to the review of the Partnership Plan are the two statutory<sup>3</sup> purposes of the National Park designation:
- to conserve and enhance the natural beauty, wildlife and cultural heritage
  - to promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public
- Also, the duty of National Park Authorities in pursuing National Park purposes:
- to seek to foster the economic and social well-being of local communities (within the National Park) by working closely with the agencies and local authorities responsible for these matters
- 1.3 During 2023-4, the ENPA gathered evidence on the state of Exmoor's special qualities, and canvassed views through a public opinion survey and workshops with delivery partners, including a Next Generation event for the 18-30 age group. It was decided to develop a new bold Vision for the National Park that would set the overall framework for management extending to 2050 and within which a focus could be developed for the next 5 years 2025-2030.
- 1.4 The Partnership Plan sits alongside the Exmoor National Park Local Plan<sup>4</sup> (ENPLP to 2031) that provides the statutory planning framework for decisions regarding development and the use of land. Both Plans are designed to help deliver the statutory purposes of the National Park. The decisions that the ENPA makes in relation to planning are also an important element of how the Partnership Plan will be delivered. The preparation of the ENP Local Plan and

<sup>1</sup> <https://www.legislation.gov.uk/ukpga/1995/25/section/66> Environment Act (1995) s66

<sup>2</sup> <https://www.exmoor-nationalpark.gov.uk/about-us/key-documents/partnership-plan-review-2023>

<sup>3</sup> National Parks & Access to the Countryside Act 1949 as amended by the Environment Act 1995

<sup>4</sup> <https://www.exmoor-nationalpark.gov.uk/planning/planning-policy/local-plan>

the current Partnership Plan<sup>5</sup> (2018 -2023) were informed by Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA).

- 1.5 The ENPPP is a statutory plan that is for the whole National Park, not just the NPA and, as such, it is for the partners – Exmoor's land and property owners and managers, the people who live and work in the NP, and for the wider public.
- 1.6 The draft ENPPP comprises a Vision for 2025 and extending into 2050, as follows:

*“Exmoor National Park is a beautiful landscape, leading the response to climate change and nature recovery. It is a place where nature can thrive, that’s proud of its cultural heritage, welcoming to all who seek out inspiration and adventure, and where people can connect with this special landscape. It is home to thriving communities, with a low carbon economy benefitting from Exmoor’s natural and cultural capital.”*

- 1.7 The review of the Partnership Plan continues on from the previous Partnership Plans with updating and refinement. An initial HRA screening was undertaken on the emerging draft Aims and Objectives that had been developed to date during the review process. The ENPPP has now been refined and further developed with strategic Aims, as follows:

**A: A cared for landscape & heritage**

**B: A nature-rich landscape**

**C: A net zero National Park, mitigating and adapting to climate change**

**D: A welcoming place for all, that people feel connected to, improving their health and well-being**

**E: Healthy Natural Resources**

**F: A great place for people to live, work and do business**

**G: Bringing it all together – place based delivery**

## HRA Requirements

- 1.8 The Habitats Regulations<sup>6</sup> transpose the requirements of the European Habitats Directive (92/43/EEC)<sup>7</sup> that aims to protect habitats and species of European nature conservation importance. The Directive establishes a network of internationally important sites designated for their ecological status. These are referred to as Natura 2000 sites or European Sites and comprise Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) that are designated under European Birds Directive<sup>8</sup>. The UK Government also requires that Ramsar sites (that support internationally

<sup>5</sup> [https://www.exmoor-nationalpark.gov.uk/\\_data/assets/pdf\\_file/0017/251162/Partnership-Plan-2018-2023-spreads.pdf](https://www.exmoor-nationalpark.gov.uk/_data/assets/pdf_file/0017/251162/Partnership-Plan-2018-2023-spreads.pdf)

<sup>6</sup> <https://www.legislation.gov.uk/uksi/2017/1012/contents/made> The Conservation of Habitats & Species Regulations 2017

<sup>7</sup> (92/43/EEC) on the Conservation of Natural Habitats and Wild Flora and Fauna [the Habitats Directive]

<sup>8</sup> 2009/147/EC) on the conservation of wild birds [the Birds Directive]

important wetland habitats and are listed under the Convention on Wetlands of International Importance [Ramsar Convention]) are included within the HRA process – and as required by the Regulations.

- 1.8 It may be noted that under planning reform through the Levelling Up & Regeneration Act (LURA, 2023)<sup>9</sup> there are changes to environmental assessment requirements. A new system with Environmental Outcomes Reports (EORs) will replace the current processes of SEA and its associated project level environmental impact assessment (EIA). The Government plans to undertake further consultation and publish regulations for EORs in 2025. The Act does not include powers to reform assessment under the Habitats Regulations. The current system will continue, allowing for coordination between the processes to avoid duplication.
- 1.9 The process of HRA is based on the precautionary principle and evidence should be presented to allow a determination of whether the impacts of a plan, when considered individually or in combination with the effects of other plans and projects against the conservation objectives of a European Site (and Ramsar site), would adversely affect the integrity of the objectives for that site - either alone or in combination with other plans and projects. Where effects are considered uncertain, the potential for adverse impacts should be assumed. If a risk of Likely Significant Effects (LSEs) is identified, then the process should progress to the Appropriate Assessment (AA) stage.
- 1.10 Such a management plan as the ENPPP does not include policies nor locationally specific plans or projects that are more likely to have identified significant effects on the protected European sites. The ENPPP establishes a strategic framework for implementation through more specific action plans and projects, for example through the local development plan.

## HRA Guidance & Methods

- 1.11 Initial guidance for HRA was published by the Government<sup>10</sup> based on the European Commission's (2001) guidance for the Appropriate Assessment (AA) of Plans. The Government's guidance recommends three main stages to the HRA process: Screening; Appropriate Assessment; Mitigation Measures. Subsequently, the nature conservation regulator Natural England produced detailed draft guidance<sup>11</sup> on the HRA of development planning documents that built on assessment experience and relevant court rulings. In 2012, DEFRA published a core guidance document relating to the Habitats & Wild Birds Directive, providing information on decision making and the HRA process for developers, regulators and land/marine managers.
- 1.12 In 2018, the Court of Justice of the European Union (CJEU) issued a judgment<sup>12</sup>, which ruled that Article 6(3) of the Habitats Directive must be interpreted as meaning that mitigation measures (referred to in the judgment

<sup>9</sup> <https://www.legislation.gov.uk/ukpga/2023/55>

<sup>10</sup> DCLG, 2006, Planning for the Protection of European Sites: Appropriate Assessment

<sup>11</sup> Tyldesley, D., 2009, The Habitats Regulations Assessment of Local Development Documents (Natural England)

<sup>12</sup> People over Wind & Sweetman v Coillte Teoranta Case C-323/17

as measures which are intended to avoid or reduce effects) should be assessed within the framework of an appropriate assessment (AA) and that it is not permissible to take account of measures intended to avoid or reduce the harmful effects of the plan or project on a European site at the screening stage. UK planning guidance<sup>13</sup> was updated to take into account such judgments and guide planning practice.

1.13 This HRA screening is being undertaken in accordance with good practice, the available guidance on process, and using principles, as follows:

- Use existing information
- Systematic and as simple as possible whilst retaining clear process robustness
- Proportionate assessment – the ENPPP is a strategic management plan
- Early consultation with Natural England

1.14 The key stages of the HRA process and the specific tasks undertaken for each stage are set out in Table 1.1 as follows:

**Table 1.1: HRA Key Stages**

Stages	Habitats Regulations Assessment
<b>Stage 1: Screening for Likely Significant Effects</b>	1. Identify European sites in and around the plan area.
	2. Examine the conservation objectives of each interest feature of the European site(s) potentially affected.
	3. Analyse the changes to environmental conditions that may occur as a result of the plan. Consider the extent of the effects on European sites (magnitude, duration, and location) based on best available information.
	4. Examine other plans and programmes that could contribute (cumulatively) to identified impacts/effects.
	5. Produce screening assessment based on evidence gathered and consult statutory nature conservation body on findings.
	6. If effects are judged likely or uncertainty exists – the precautionary principle applies proceed to Stage 2.
<b>Stage 2: Appropriate Assessment</b>	1. Agree scope and method of Appropriate Assessment with statutory nature conservation body.
	2. Collate all relevant information and evaluate potential impacts on site(s) in light of conservation objectives.
<b>Stage 3: Mitigation Measures and Alternatives Assessment</b>	1. Consider how effect on integrity of site(s) could be avoided by changes to plan and the consideration of alternatives (e.g. an alternative policy/ spatial location). Develop mitigation measures (including timescale and mechanisms for delivery).
	2. Prepare HRA/AA report and consult statutory body.
	3. Finalise HRA/AA report in line with statutory advice to accompany plan for wider consultation.

<sup>13</sup> <https://www.gov.uk/guidance/appropriate-assessment>

## Overall Approach to the HRA of the Partnership Plan

- 1.15 When undertaking HRA on a plan, it is important to ensure that the assessment is carried out at an appropriate scale and level of detail. The Exmoor National Park Partnership Plan provides a strategic framework comprising a long-term Vision for a beautiful living landscape and leading the response to climate change and nature recovery. There are seven aspirational Aims supported by Objectives with targets for guiding management of the National Park in consideration of its duty and purposes. Such a management plan does not include policies nor locationally specific plans or projects that are more likely to have identified significant effects on the protected European sites.
- 1.16 This HRA screening has drawn upon the previous HRAs of the Exmoor Local Plan to 2031 and of the current Partnership Plan 2018-2023. It has also taken into account the broader strategic role of the Partnership Plan, together with the role of the Local Plan to help implement many of the aspirations in the Partnership Plan. The Exmoor Local Plan to 2031 was subject to comprehensive HRA<sup>14</sup> and the Partnership Plan 2018-2023 was also subject to HRA<sup>15</sup> and in consistency with the HRA of the LP.
- 1.17 It may be noted that these assessments were undertaken in accordance with good practice and established UK methods at the time i.e. before the CJEU rulings. Nonetheless, the baseline information with sites characterisations, scoping, and identification of impact pathways remains substantial relevant work. Therefore, the overall approach to this HRA screening is to update the earlier work, avoid duplication, and ensure that the screening stage of the process aligns with current guidance. It is considered that this is appropriate and proportionate for the review of a management plan of this nature.

## Consultation

- 1.19 An Initial draft HRA Screening Report (September 2023) was sent to the relevant nature conservation regulator, Natural England, but no comments were received. This updated draft HRA Screening Report is being sent to Natural England for a formal 5 week consultation period, at the same time that the draft Exmoor Partnership Plan is published for public consultation in 2025. Any comments received will be taken into account in preparing the final HRA Report. When the Exmoor National Park Partnership Plan is adopted later in 2025.

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<sup>14</sup> [https://www.exmoor-nationalpark.gov.uk/\\_data/assets/pdf\\_file/0030/284808/HRA-draft-Exmoor-NP-Local-Plan-2013.pdf](https://www.exmoor-nationalpark.gov.uk/_data/assets/pdf_file/0030/284808/HRA-draft-Exmoor-NP-Local-Plan-2013.pdf)

<sup>15</sup> <https://www.exmoor-nationalpark.gov.uk/about-us/key-documents/HRA-Exmoor-NP-Partnership-Plan-2012-17.pdf>



## 2.0 SCOPE OF ASSESSMENT

### Relevant European Sites

2.1 Established practice in the UK suggests that all European (Natura 2000) sites within a plan area, together with all those within a 10km buffer zone should be considered as potential receptors for negative effects. Sites further than 10km may also be affected, particularly if there is the potential for changes to water levels or quality that may be generated by the plan. The previous HRAs of the LP and PP identified relevant sites with component sites within the ENPA area, as follows:

- **Exmoor Heaths SAC** – component sites: North Exmoor SSSI, South Exmoor SSSI, Exmoor Coastal Heaths SSSI, West Exmoor Coast & Woods SSSI
- **Exmoor and Quantock Oak Woodlands SAC** – component sites: Barle Valley SSSI North Exmoor SSSI Exmoor Coastal Heaths SSSI West Exmoor Coast & Woods SSSI Watersmeet SSSI

Two other sites outside the boundary of the ENP and within 10km were considered but found to have no impact pathways, for example, not hydrologically linked to the National Park, and were not screened into previous assessments, as follows:

- Culm Grasslands SAC
- Holm Moor & Clean Moor SAC

2.2 European sites are designated for both species and habitat features with conservation objectives and targets that relate to maintaining the integrity of these features. Site characterisation and reasoning for designation are published by JNCC<sup>16</sup> and were discussed in detail in section 3 of the HRA<sup>17</sup> of the ENPPP 2018-2023, and included mapping Ecological Zones of Influence (EZIs) for the two SACs. Natural England also advises on the conservation objectives for designated European Sites<sup>18</sup>.

2.3 Site Improvement Plans (SIPs)<sup>19</sup> have been developed for each Natura 2000 site in England by Natural England. SIPs provide a high level overview of the issues (current and predicted) affecting the condition of the Natura 2000 features on the site(s) and outline the priority measures required to improve the condition of the features.

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<sup>16</sup> <https://sac.jncc.gov.uk/site/>

<sup>17</sup> <https://www.exmoor-nationalpark.gov.uk/about-us/key-documents/HRA-Exmoor-NP-Partnership-Plan-2012-17.pdf>

<sup>18</sup> <https://publications.naturalengland.org.uk/publication/5674075309473792?category=5374002071601152>

<sup>19</sup> <https://publications.naturalengland.org.uk/publication/6348361586180096> and <https://publications.naturalengland.org.uk/publication/6214125369688064>

## Sites Characterisation

- 2.4 **Exmoor Heaths SAC** is primarily designated for its European dry heaths, Northern Atlantic wet heaths, Blanket bogs, and Vegetated sea cliffs (SIP, 2014). It also has some Old sessile oak woodland and very small areas of Alkaline fen. The wet heath is extremely variable in nature and has in places been modified by management, particularly burning. The Exmoor heaths are also important as the largest stronghold for the heath fritillary butterfly *Mellicta athalia*, associated with sheltered slopes in the transition to woodland.
- 2.5 The SIP identified priority issues for impacts of atmospheric nitrogen deposition; drainage; inappropriate pest control; agricultural management practices; invasive species; managed rotational burning; change in land management; and direct impact from third party (illegal vehicle use & pony trekking). It notes that increasing *Molinia* moor grass abundance may reflect increasing eutrophication in line with the findings of recent Dutch research on this matter.
- 2.6 The previous HRA<sup>20</sup> reported that the Ecological Zone of Influence (EZI) lies entirely within the site boundary as any impacts are only likely from visitor pressures. Heathland habitat is dependent upon low intensity, traditional agricultural management by grazing, and such management is becoming less economic. This site is also vulnerable to atmospheric deposition (nitrogen) and eutrophication.
- 2.7 The Exmoor State of the Park Report (draft June 2023)<sup>21</sup> records that 57% of moorland is designated as Exmoor Heaths SAC and 94% of moorland is access land. There has been significant vegetation change on the moors over the last 40 years with less heather (declines ranging from 20-65%); more gorse, bracken and purple moor grass. Mosaics of vegetation have been replaced by one dominant species. The cause of these changes are complex but are linked to changes in management particularly grazing and swaling; heather beetle damage; climate change; and increased nitrogen deposition from air pollution.
- 2.8 Nitrogen deposition continues to exceed site relevant critical loads (APIS, 2020)<sup>22</sup>. Enhanced reactive nitrogen deposition is a consequence of global emissions of oxidised nitrogen (NO, HNO<sub>3</sub> and NO<sub>2</sub> – often referred to as NO<sub>y</sub>) from fossil fuel combustion, and reduced N (NH<sub>x</sub>) from agricultural sources. Nitrogen is a major growth nutrient: all plants need N in order to grow. Plant communities most at risk from N eutrophication are those rich in bryophytes and where species richness is comprised of slow growing species. Getting the balance right between management intervention and N deposition is a complex issue of optimising positive and negative outcomes, and the ENPA has commissioned research that will inform development of a AQM Strategy.

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<sup>20</sup> <https://www.exmoor-nationalpark.gov.uk/about-us/key-documents/HRA-Exmoor-NP-Partnership-Plan-2012-17.pdf>

<sup>21</sup> [https://www.exmoor-nationalpark.gov.uk/\\_data/assets/pdf\\_file/0029/477515/State-of-Park-2023-for-website.pdf](https://www.exmoor-nationalpark.gov.uk/_data/assets/pdf_file/0029/477515/State-of-Park-2023-for-website.pdf)

<sup>22</sup> <https://www.apis.ac.uk/app>

- 2.9 **Exmoor and Quantock Oak Woodlands SAC** is overall nearly 1900 ha and has some of the largest woodlands in lowland England (SIP, 2014). The woodland is mainly ancient, semi-natural sessile oak woodland with rich lichen and bryophyte communities, occupying steep sided valleys. In some places, there are long transitions to other semi-natural habitats; small areas of heaths/scrub, grassland/bracken and small areas of sea cliffs, conifer or mixed woodland are included in the SAC. The European interest features represented include: Old sessile oak woods with holly and hard fern, Alluvial forests with alder and ash, Barbastelle and Bechstein's bat, otter.
- 2.10 The SIP identified priority issues for invasive species; forestry & woodland management; disease; risk of atmospheric nitrogen deposition; change in land management; and deer. Further evidence is required however the condition assessment for lichens (a notified SSSI feature) on component SSSIs concludes that the lichen flora is growing in very clean air, with no signs of current acidification or nitrogen deposition and is in favourable condition for this particular lichen attribute (Negative indicators: pollution). No local evidence is currently available either way for other possible effects on the woodland flora (bryophytes or ground flora).
- 2.11 The previous HRA<sup>23</sup> reported that the woodland habitats are sensitive to changes in hydrology and air quality. Ecological Zones of Impact were identified for those components of the SAC with barbastelle bats at a 9km buffer and for Bechstein's bats at a 3.5km buffer. There are records of otters for every watercourse within the SAC. Some grazing/browsing is essential to maintain conditions suitable for lower plant assemblages, which are a key feature of the woodlands. However, sheep and/or red deer graze many woods and this can prevent regeneration and change the ground flora. Drainage and potential impacts of lowering water table (including abstraction) is potentially an issue. There is potential conflict between forestry and woodland management, and potential impacts from surrounding land use (e.g. agriculture, pheasant rearing affecting bats and otter).
- 2.12 The Exmoor State of the Park Report (draft June 2023)<sup>24</sup> records the decline in traditional woodland management that threatens landscape character. Water quality sampling 2021- 2022 found moderate levels of phosphate and very low ammonia in all catchments. Nitrates were found at moderate levels in the Barle, and relatively high levels in the Haddeo (although lower than the previous year) and Little Exe. Otters are generally faring well on Exmoor.
- 2.13 Nitrogen deposition continues to exceed site relevant critical loads (APIS 2020)<sup>25</sup>.

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<sup>23</sup> <https://www.exmoor-nationalpark.gov.uk/about-us/key-documents/HRA-Exmoor-NP-Partnership-Plan-2012-17.pdf>

<sup>24</sup> [https://www.exmoor-nationalpark.gov.uk/\\_data/assets/pdf\\_file/0029/477515/State-of-Park-2023-for-website.pdf](https://www.exmoor-nationalpark.gov.uk/_data/assets/pdf_file/0029/477515/State-of-Park-2023-for-website.pdf)

<sup>25</sup> <https://www.apis.ac.uk/app>

## Potential Effects from the draft ENPPP

- 2.14 A summary of the types of effects and impacts that could arise from activities associated with the ENPMP and other key plans in the area are set out in Table 2.1 as follows:

**Table 2.1: Possible Effects & Impacts on European Sites**

Effects on European Sites	Impact Types
Habitat & species fragmentation & loss	Direct land take or land use change – farming/grazing, forestry/woodlands Removal of green/connecting corridors supporting habitat Changes to sediment patterns (rivers and coastal areas) Loss/erosion of soil, change in quality (visitors, change in use – farming/grazing, forestry) Introduction of invasive species (predation)
Disturbance	Increased recreational activity (population increase) Noise and light pollution (from development, change of use, and increased traffic)
Changes to hydrological regime/water levels	Increased abstraction levels (new development or changes to farming/forestry) Increased hard standing non-permeable surfaces/accelerated run-off Laying pipes/cables (surface & ground) Topography alteration, including changes to a more natural flood management Changes in land use, including farming/grazing, rewilding & new woodland planting Loss of soils (new development on greenfield land)
Changes to water quality	Increase in run-off/pollutants from non-permeable surfaces (roads, built areas) & agricultural/forestry practices, including use of fertilisers & emissions from vehicles – increasing issues for nitrogen neutrality <sup>26</sup> Increased air pollution (traffic, land management & livestock farming) Changes to volume of discharges (consented)
Changes in air quality	Increased traffic movements Changes to air pollution, including acid deposition, nitrogen dioxide, ozone, particulates Increased/changed emissions from buildings

- 2.15 The previous HRA<sup>27</sup> identified the potential for significant effects, taking into account the qualifying features of the two identified designated European sites. The key environmental conditions, such as air, water, soil quality, appropriate management, and hydrology, to support site integrity for each qualifying feature were also identified. As the overall reasoning and content

<sup>26</sup> For example, in the Solent Estuary – see Natural England Advice for LPAs version 2 June 2019 available at <http://www.newforest.gov.uk/media/39460/Advice-on-achieving-nutrient-neutrality-for-new-development-in-the-Solent-region/Pdf/SolentNutrientAdviceV2June2019.pdf>

<sup>27</sup> <https://www.exmoor-nationalpark.gov.uk/about-us/key-documents/HRA-Exmoor-NP-Partnership-Plan-2012-17.pdf>

for the emerging new Partnership Plan seeks to fulfil the same purposes and duty, it is considered that these remain relevant.

**Table 2.2: Impacts on SAC Features potentially arising from the ENPPP**

SAC Qualifying Features	Recreational Disturbance	Habitat & Species Loss or Fragmentation	Air Quality	Hydrology & Water Quality	Soil Conditions
<b>Exmoor Heaths SAC</b>					
Northern Atlantic wet heaths with <i>Erica tetralix</i>	✓	✓	✓	✓	✓
European dry heaths	✓	✓	✓		✓
Vegetated sea cliffs of Atlantic & Baltic coasts	✓				
Blanket bogs	✓		✓	✓	
Alkaline fen (very small areas)			✓	✓	✓
Old sessile oak woods with holly & fern (some)	✓		✓		
<b>Exmoor &amp; Quantock Oak Woodlands SAC</b>					
Old sessile oak woods with holly & fern	✓		✓		
Alluvial forests with alder & ash	✓		✓	✓	
Barbastelle bat <i>Barbastella barbastellus</i>	✓	✓		✓	
Bechstein's bat <i>Myotis bechsteinii</i>	✓	✓		✓	
Otter <i>Lutra lutra</i>	✓	✓		✓	

2.16 For Exmoor NP, the scale of new housing is very low but there could be increased recreational pressures associated with increased housing from other Local Plans, especially nearby Taunton and Exeter. The Park is a popular holiday and leisure destination. Typical impacts of tourism and recreation include

- Physical damage, for example from trampling and erosion
- Disturbance to species, such as ground-nesting birds and wintering wildfowl, from walking, cycling, and water sports, resulting in increased mortality and nesting success, and displacement
- Air pollution and disturbance from traffic
- Disturbance from dogs

2.17 The previous HRA identified that here is unlikely to be direct loss of habitat within the designated boundaries of a Natura 2000 site. However, supporting habitat outside the boundary could be an issue, for example, bats, otters relying on water sources beyond the site. Changes in land management are most likely to cause habitat fragmentation. Many of the most significant risks to water quality are as a result of agricultural activity.

2.18 The Exmoor State of the Park Report (draft June 2023) notes that sightseeing is the most popular activity on Exmoor with 78% of visitors participating. Popular

countryside visitor sites such as North Hill, Haddon Hill, Tarr Steps and Landacre have recreational management issues including litter and dog mess. Exmoor remains a popular location for large organised (corporate or charity) recreational events which can cause localised disruption while they take place. However, they encourage people to visit Exmoor, contribute to the local economy, and their impact is not considered to be significant. The report notes that one of the climate change implications for nature is the decline in soil health.

## Other Plans & Projects

- 2.19 Adjacent Local Plans: New housing arising from development policies in nearby plan areas (such as Taunton and Exter) could have in-combination effects from increased potential for recreational effects on the two SACs. The Somerset Waste Strategy to 2028 focuses on existing facilities and therefore, no in-combination effects are likely. The Somerset Minerals Plan to 2030 shows that there are no active quarries in the ENP and therefore, no in-combination effects likely. Somerset's Future Transport Plan 2011-2026 shows that major schemes are concentrated around Taunton; there are no national strategic freight routes within the ENP, and in-combination effects are not likely. The Somerset Rights of Way Improvement Plan 2 covering the period 2022-2032<sup>28</sup> seeks to improve access and there could be in-combination effects with associated increased recreational pressure.

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<sup>28</sup> [https://www.exmoor-nationalpark.gov.uk/\\_data/assets/pdf\\_file/0019/221482/EB46-Somerset-County-Council-2015-Rights-of-Way-Improvement-Plan-2-including-Appendices.pdf](https://www.exmoor-nationalpark.gov.uk/_data/assets/pdf_file/0019/221482/EB46-Somerset-County-Council-2015-Rights-of-Way-Improvement-Plan-2-including-Appendices.pdf)

## 3.0 SCREENING FOR LIKELY SIGNIFICANT EFFECTS (LSEs)

### Screening Assessment for Likely Significant Effects (LSEs)

3.1 HRA screening assessment considers those elements of a plan that could have effects where potential environmental impact pathways have been identified and in the light of the environmental conditions necessary to maintain site integrity for the European sites scoped into the assessment. The emerging ENPPP draft Aims and Objectives are the strategic aspirations for activities and actions that could have effects on European sites.

3.2

**Aim: A cared for landscape & heritage**

**Objectives:**

- Exmoor's unspoilt natural beauty, tranquillity, openness, wildness and dark night skies are celebrated, looked after, and enjoyed
- Exmoor's irreplaceable historic environment and cultural heritage is cared for, celebrated and plays a key role in informing our future

3.3 These aspirations for landscape and heritage are general statements, and the objectives for increasing tranquillity, reducing light pollution, and increasing areas of dark sky are likely to have positive effects for the natural beauty of the area and including designated sites. Acknowledging that Exmoor has irreplaceable historic environment and cultural heritage will have positive effects for the historic environment through the objective to care for, celebrate and ensure that it plays a key role in the future. There are no LSEs indicated for the SACs. It is noted that Molland Moor is one of the principal archaeological landscapes of Exmoor and also a SSSI and component of the SAC. The national designations protect the moorland and archaeological landscape asset. Overall, the aim and objectives are likely to protect and enhance the landscape and historic environment and no adverse LSEs are indicated – alone or in-combination with other plans.

3.4

**Aim: A nature-rich landscape**

**Objectives:**

- Habitats Exmoor's rich mosaic of wildlife habitats is enhanced, extended, resilient and well-connected, forming a network of nature-rich areas with blurred edges, corridors linking them and stretching across the National Park boundary
- Wildlife is thriving with a greater abundance of species that can easily move across the landscape and adapt to a changing climate

3.5 The aspirational aim provides a strong framework for the fundamental integration between nature and landscape and people. The objective for habitats is enhancement, extension, resilience and well-connected. This indicates improvement and resilience for climate change effects. The objective for thriving wildlife and greater abundance of species that can move easily is strongly proactive towards increasing biodiversity. Overall, this aim and objectives will have very strong positive effects for nature and biodiversity throughout the Park – and this will include the designated sites; so no adverse LSEs indicated - alone or in-combination with other plans.

3.6

**Aim: A net zero National Park, mitigating and adapting to climate change**

**Objectives:**

- Exmoor is a net zero National Park, reducing greenhouse gas emissions to a minimum level and locking up carbon in peatlands, trees, soils and plants
- Exmoor's natural and historic assets, local communities and businesses are adapted and resilient to climate change

3.7 This is an ambitious aim is likely to be challenging. Targets are likely to be associated with sustainable practices that overall are likely to improve the quality of soils and woodlands. Adaptation and resilience to climate change for natural and historic assets, local communities and businesses will contribute to positive effects for the Park. Overall, this aim and objectives will have strong positive effects for climate change throughout the Park – and this will include the designated sites; so no adverse LSEs indicated - alone or in-combination with other plans.



3.8

**Aim: A welcoming place for all, that people feel connected to, improving their health and well-being**

**Objectives**

- More people are connected with, inspired by, and care for Exmoor, improving their health and well-being and providing a “Natural Health Service”
- Public paths, open access land, recreational facilities and popular sites are well maintained and accessible for all to experience and enjoy Exmoor
- Exmoor is promoted and managed as a regenerative tourism destination, providing a great visitor experience, leaving the environment in a better state, and positively contributing to the well-being of local communities
- There are more opportunities for young people from all backgrounds to explore and connect and with Exmoor, developing skills and knowledge, and taking an active role in the future of Exmoor

3.9 Increasing the number of people who are connected with, can enjoy and care for Exmoor could increase recreational pressures on nature, including the designated sites. However, the third objective seeks to promote Exmoor as a sustainable tourism destination with regenerative tourism principles, and as such, LSEs are not indicated.

3.10 The third objective clearly states that a great visitor experience will leave the environment in a better state – and as such, LSEs are not indicated. There could be adverse effects from increased traffic, including air quality, but the third objective promotes sustainable tourism, including green travel to and from the NP as well as within the NP, thus indicating potential positive effects. Any increase in visitor numbers is not necessarily associated with wider access to sensitive areas in the Park, such as disturbance of bat roosting sites associated with the Exmoor & Quantock Woodlands SAC, or damage to heathland – the focus is on the most popular routes and positive management will reduce negative impacts. Overall, there are no adverse LSEs indicated - alone or in-combination with other plans.

3.10

**Aim: A great place for people to live, work and do business**

**Objectives:**

- Exmoor's communities and economy are sustainable and resilient, supporting the transition to a low carbon economy and lifestyles, and providing new opportunities, skills and employment

- 3.11 The objective aspires to transition to a local, low carbon economy and lifestyle. It could be considered that low carbon might include encouragement of renewable energy such as wind turbines and small-scale hydropower. Bats may be at some risk from collisions to turbines and otters, bryophytes and lichens may be sensitive to changes in the water environment. There is no locational specificity in this strategic objective and any risk to protected species will be addressed through other regulatory regimes, including the development planning system and where project level HRA may be more appropriate.
- 3.12 The objective includes innovation and could include encouragement of renewable energy and other low carbon initiatives such as woodland planting. However, this aim and objective provide strategic guidance and more detailed action planning is likely to provide further guidance for farming, and including how the transition to the new environmental land management schemes progresses.
- 3.13 Overall, this aim and objective will have positive effects for the low carbon economy, supporting communities and businesses throughout the Park. There are no adverse LSEs indicated - alone or in-combination with other plans.

3.14

**Aim: Bringing it all together – place based delivery**

**Objectives**

- Exmoor's distinctive **moorland and farmed** landscapes are evolving and resilient to climate change. Their natural beauty is enhanced and heritage conserved. Habitats are more diverse, in better condition, extended, connected and richer in wildlife. Some areas are wilder and natural processes are restored. Land is managed sustainably to produce high quality food and timber. People can access and enjoy these special places including the tranquillity and dark night skies
- Exmoor's **woodlands and tree cover** are diverse, well-managed, expanded, better connected, more resilient, and productive. They enhance the natural beauty, wildlife, cultural heritage and enjoyment of the National Park and play a major role in responding to climate change
- Exmoor's **wetlands, rivers, streams** and their associated valleys are in good condition and function more naturally. Their native flora and fauna is thriving, and flood risk is reduced. Access is managed sensitively
- Exmoor's stunning **coast** has access opportunities for all, where people and nature can thrive, heritage is conserved, and we build resilience to coastal change

3.15 This aim recognises the inter-relationships between sustainability topics and acknowledges that the four key types of habitat resource are fundamental to the management of the National Park. This provides additional guidance for the management of the National Park, promoting a more natural functioning that encourages both nature and people to thrive. This will contribute to protection and enhancement of nature, including designated nature conservation sites. Overall, there are no adverse LSEs indicated - alone or in-combination with other plans.

3.16 The HRA screening assessment may be summarised, as follows:

**Table 3.1: HRA Screening Summary**

Likely Significant Effects (LSEs)				
Designated Sites	Recreation Disturbance	Habitat Loss Fragmentation	Air Quality	Water
Exmoor Heaths SAC	No	No	No	No
Exmoor & Quantock Woodlands SAC	No	No	No	No

Key:

Likely Significant Effect	Yes	Appropriate Assessment required
No Likely Significant Effect	No	No further assessment required
Significant Effect Uncertain	?	Uncertain, precautionary approach taken, and Appropriate Assessment required

### Further Assessment Needed?

- 3.17 The HRA screening assessment for the emerging draft Exmoor Partnership Plan 2024-2029 identified that there will be no likely significant adverse effects – alone or in-combination with other plans or projects. Therefore, no further assessment is required at this stage of plan-making. The HRA screening considered the strategic nature of the Plan and it is noted that the need for further HRA may need to be considered again as specific strategies or action plans are developed.

## 4.0 HRA SUMMARY, CONCLUSION & NEXT STEPS

- 4.1 This report explains the context for, the approach and methods used, and the findings arising from the HRA screening assessment of the draft Exmoor Partnership Plan 2025-2030. The HRA has been undertaken with current government guidance and good practice. It considered two European sites, components of which are located within the Exmoor National Park boundary – Exmoor Heaths SAC; Exmoor & Quantock Woodlands SAC. This HRA screening has drawn upon and updated the previous HRAs of the Exmoor Local Plan to 2031 and the current Partnership Plan 2018-2023.
- 4.2 The HRA screening identified that due to the strategic nature of the Partnership Plan, there were no identified adverse Likely Significant Effects (LSEs) for air quality changes, recreational disturbance, changes to water quality or levels, and habitat loss or fragmentation – alone or in-combination with other plans. It is recognised that the Partnership Plan itself does not authorise or permit development, proposals or projects. The ENPPP is an aspirational plan that sets a strategic framework with a Vision, Aims and Objectives for progression of more specific strategies, plans and actions that are likely to enhance the SACs – and as evidenced by proposed the Targets. At this strategic stage there is insufficient information or locational specificity to assess the effects on the European sites. As specific projects or plans are developed, there may be a need to consider further HRA, if there is a risk that they may impact on site integrity.
- 4.3 The overall conclusion of the HRA screening assessment of the draft Exmoor National Park Partnership Plan 2025-2030 is that it will have no adverse impact on the integrity of any European site, either alone or in combination with other plans and projects.
- 4.4 The HRA Regulations require that the plan-making authority should carry out formal consultation with the environmental bodies, in this case Natural England. Any comments received on this HRA Report will be taken into consideration in the final HRA Screening Report that will accompany the Exmoor National Park Partnership Plan on adoption later in 2025.