

HABITATS REGULATIONS ASSESSMENT

Flintshire Local Development Plan

Screening Report

OCTOBER 2020

Incorporating

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Screening Report

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VERSION CONTROL

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03	27 October 2020	AE	Amended to incorporate changes to the LDP

This report dated 27 October 2020 has been prepared for Flintshire County Council (the "Client") in accordance with the terms and conditions of appointment dated 07 June 2017 (the "Appointment") between the Client and **Arcadis Consulting (UK) Limited** ("Arcadis") for the purposes specified in the Appointment. For avoidance of doubt, no other person(s) may use or rely upon this report or its contents, and Arcadis accepts no responsibility for any such use or reliance thereon by any other third party.

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1 INTRODUCTION

1.1 Purpose

1.1.1 This Habitats Regulations Assessment (HRA) Report has been prepared by Arcadis Consulting UK (Ltd) on behalf of Flintshire County Council as part of their review of the Local Plan. This Report comprises Stage 1 (the initial screening and detailed screening) of the HRA process. Further details of the HRA stages are provided in Section 2.

1.2 The Plan

1.2.1 Flintshire County Council is currently preparing its Local Development Plan (LDP) covering the timeframe 2015 to 2030. Once adopted, the LDP will replace the existing Flintshire Unitary Development Plan (UDP) and will become the framework against which decisions on planning applications are taken.

1.3 Local Plan Policies and Sites

1.3.1 There are 84 policies contained within the LDP. These are set out within Table 1. There are also 40 allocation sites (including residential, employment, mixed-use, retail and energy developments). The allocations are shown on the Policies maps which accompanies the LDP. The three main strategic objectives of the LDP comprise:

- Enhancing Community Life.
- Delivering Growth and Prosperity.
- Safeguarding the Environment.

1.3.2 The policies are set out within Table 2.

Table 1: Policies within the LDP

Overarching Policy Areas	Policies	Allocation site associated with policy
Strategic Policies		
Creating Sustainable Places and Communities	Policy STR1: Strategic Growth Policy STR2: The Location of Development	N/A
	Policy STR3: Strategic Sites	Ref: STR3A: Northern Gateway Mixed Use Development Site Ref: STR3B: Warren Hall Mixed Use Development Site
	Policy STR4: Principles of Sustainable Development, Design and Placemaking Policy STR5: Transport and Accessibility Policy STR6: Services, Facilities and Infrastructure	N/A
Supporting a Prosperous Economy	Policy STR7: Economic Development, Enterprise, and Employment Policy STR8: Employment Land Provision Policy STR9: Retail Centres and Development Policy STR10: Tourism, Culture, and Leisure	N/A
Meeting Housing Needs	Policy STR11: Provision of Sustainable Housing Sites	N/A

Overarching Policy Areas	Policies	Allocation site associated with policy
Valuing the Environment	Policy STR12: Provision for Gypsies and Travellers Policy STR13: Natural and Built Environment, Green Networks and Infrastructure Policy STR14: Climate Change and Environmental Protection Policy STR15: Waste Management Policy STR16: Strategic Planning for Minerals	N/A
Development Management Policies (Topic, Criteria and Area Based Policies)		
Creating Sustainable Places and Communities	Policy PC1: The Relationship of Development to Settlement Boundaries Policy PC2: General Requirements for Development Policy PC3: Design Policy PC4: Sustainability and Resilience of New Development Policy PC5: Transport and Accessibility Policy PC6: Active Travel Policy PC7: Passenger Transport Policy PC8: Airport Safeguarding Zone Policy PC9: Protection of Disused Railway Lines Policy PC10: New Transport Schemes	N/A
	Policy PC11: Mostyn Docks	Mostyn Docks
	Policy PC12: Community Facilities	Ref: PC12.1: Community Centre, Woodlane Ref: PC12.2: Greenfield Cemetery Ref: PC12.3: Treuddyn Cemetery
Supporting a Prosperous Economy	Policy PE1: General Employment Land Allocations	Ref: STR3A: Northern Gateway Mixed Use Development Site Ref: STR3B: Warren Hall Mixed Use Development Site Ref: PE1.1: Chester Aerospace Park Ref: Ref: PE1.2: Manor Lane/Hawarden Park Extension Ref: PE1.3: Drury New Road Ref: PE1.4: Greenfield Business Park, Phase II Ref: PE1.5: Greenfield Business Park, Phase III Ref: PE1.6: Broncoed Industrial Estate Ref: PE1.7: Mold Business Park Ref: PE1.8: Adjacent Mostyn Docks

Overarching Policy Areas	Policies	Allocation site associated with policy
		<p>Ref: PE1.9: Chester Road East</p> <p>Ref: PE1.10: Antelope Industrial Estate</p> <p>Ref: PE1.11: River Lane</p> <p>Ref: PE1.12: Rowley's Drive</p>
	<p>Policy PE2: Principal Employment Areas</p>	<p>Ref: PE2.1: Ewloe Barns (Industrial Estate) Alltami</p> <p>Ref: PE2.2: Alltami Depot, Alltami</p> <p>Ref: PE2.3: Manor Industrial Estate, Bagillt</p> <p>Ref: PE2.4: Broughton Mills, Broughton</p> <p>Ref: PE2.5: Catheralls Industrial Estate and Pinfold Industrial Estate, Buckley</p> <p>Ref: PE2.6: Drury Lane Industrial Estate, Buckley</p> <p>Ref: PE2.7: Little Mountain Industrial Estate, Buckley</p> <p>Ref: PE2.8: Spencer Industrial Estate, Buckley</p> <p>Ref: PE2.9: Evans Business Centre, Chester West</p> <p>Ref: PE2.10: Dock Road, Connah's Quay</p> <p>Ref: PE2.11: Deeside Industrial Park, DARA and Northern Gateway, Deeside</p> <p>Ref: PE2.12: St Davids Park, Ewloe</p> <p>Ref: PE2.13: Ashmount Industrial Estate, Flint</p> <p>Ref: PE2.14: Castle Park/ Ashmount Industrial Centre, Flint</p> <p>Ref: PE2.15: Greenfield Business Park, Greenfield</p> <p>Ref: PE2.16: Hawarden Industrial Park, Chester Aerospace Park and Hawarden Airport, Hawarden</p> <p>Ref: PE2.17: Broncoed Industrial Estate, Mold</p> <p>Ref: PE2.18: Mold Business Park, Mold</p> <p>Ref: PE2.19: Mold Industrial Estate, Mold</p> <p>Ref: PE2.20: Mostyn Docks, Mostyn</p> <p>Ref: PE2.21: Pentre Industrial Estate, Pentre</p> <p>Ref: PE2.22: Queensferry Industrial Estate, Pentre</p>

Overarching Policy Areas	Policies	Allocation site associated with policy
		<p>Ref: PE2.23: Expressway Business Park, Queensferry</p> <p>Ref: PE2.24: Antelope Industrial Park, Rhydymwyn</p> <p>Ref: PE2.25: Brymau One, Two and Three Estates and Glen Industrial Estate, Saltney</p> <p>Ref: PE2.26: The Borders Industrial Park, Chesterbank Industrial Park and Brymau Four Estate, Saltney</p> <p>Ref: PE2.27: Engineer Park and St Ives Park, Sandycroft</p> <p>Ref: PE2.28: Glendale Business Park, Sandycroft</p> <p>Ref: PE2.29: Sandycroft Industrial Estate, Sandycroft</p> <p>Ref: PE2.30: Rowley's Drive, Shotton</p>
	<p>Policy PE3: Employment Development Outside Allocated Sites and Principal Employment Areas</p> <p>Policy PE4: Farm Diversification</p> <p>Policy PE5: Expansion of Existing Employment Uses</p> <p>Policy PE6: Protection of Employment Land</p> <p>Policy PE7: Retail Hierarchy</p>	N/A
	Policy PE8: Development within Primary Shopping Areas	<p>Land North of Broughton Park</p> <p>Land to the south of Chester Road</p>
	<p>Policy PE9: Development outside Primary Shopping Areas</p> <p>Policy PE10: District and Local Centres</p> <p>Policy PE11: Edge and Out of Town Retail Development</p> <p>Policy PE12: Tourist Accommodation, Facilities and Attractions</p> <p>Policy PE13: Caravan Development in the Open Countryside</p> <p>Policy PE14: Greenfield Valley</p>	N/A
Meeting Housing Needs	Policy HN1: New Housing Development Proposals	<p>Ref: STR3A: Northern Gateway Mixed Use Development Site</p> <p>Ref: STR3B: Warren Hall Mixed Use Development Site</p> <p>Ref: HN1.1: Well Street, Buckley</p> <p>Ref: HN1.2: Broad Oak, Holding, Mold Rd, Connah's Quay</p>

Overarching Policy Areas	Policies	Allocation site associated with policy
		<p>Ref: HN1.3: Highmere Drive, Connah's Quay</p> <p>Ref: HN1.4: Northop Road, Flint</p> <p>Ref: HN1.5: Maes Gwern, Mold</p> <p>Ref: HN1.6: Land between Denbigh Road and Gwernaffield Rd, Mold</p> <p>Ref: HN1.7: Holywell Rd/Green Lane, Ewloe</p> <p>Ref: HN1.8: Ash Lane, Hawarden</p> <p>Ref: HN1.9: Wrexham Road, HCAC</p> <p>Ref: HN1.10: Cae Isa, A5119, New Brighton</p> <p>Ref: HN1.11: Chester Road, Penymynydd</p>
	<p>Policy HN2: Density and Mix of Development</p> <p>Policy HN3: Affordable Housing</p> <p>Policy HN4: Housing in the Countryside</p> <p>Policy HN4-A: Replacement Dwellings</p> <p>Policy HN4-B: Residential Conversion of Rural Buildings</p> <p>Policy HN4-C: Infill Development in Groups of Houses</p> <p>Policy HN4-D: Affordable Housing Exceptions Schemes</p> <p>Policy HN5: House Extensions and Alterations</p> <p>Policy HN6: Annex Accommodation</p> <p>Policy HN7: Houses in Multiple Occupation</p> <p>Policy HN9: Gypsy and Traveller Accommodation</p>	N/A
	<p>Policy HN8: Gypsy and Traveller Sites</p>	<p>Ref: HN8.1: Magazine Lane, Ewloe (Extension)</p> <p>Ref: HN8.2: Gwern Lane, Cae Estyn, Hope (Extension)</p> <p>Ref: HN8.3: Riverside, Queensferry (Extension)</p> <p>Ref: HN8.4: Castle Park Industrial Estate</p>

Overarching Policy Areas	Policies	Allocation site associated with policy
Valuing the Environment	Policy EN1: Sports, Recreation and Cultural Facilities Policy EN2: Green Infrastructure Policy EN3: Undeveloped Coast and Dee Estuary Corridor Policy EN4: Landscape Character Policy EN5: Area of Outstanding Natural Beauty Policy EN6: Sites of Biodiversity Importance Policy EN7: Development Affecting Trees, Woodland and Hedgerows Policy EN8: Built Historic Environment and Listed Buildings Policy EN9: Development in or Adjacent to Conservation Areas Policy EN10: Buildings of Local Interest	N/A
	Policy EN11: Green Barriers	N/A
	Policy EN12: New Development and Renewable and Low Carbon Energy Technology	N/A
	Policy EN13: Renewable and Low Carbon Energy Development	Ref: EN13.1: Crumps Yard, Connah's Quay Solar Farm Ref: EN13.2: Castle Park Solar Farm
	Policy EN14: Flood Risk Policy EN15: Water Resources Policy EN16: Development on or near Landfill Sites or Derelict and Contaminated Land Policy EN17: Development of Unstable Land Policy EN18: Pollution and Nuisance Policy EN19: Managing Waste Sustainably Policy EN20: Landfill Buffer Zone Policy EN21: Locations for Waste Management Facilities Policy EN22: Criteria for Waste Management Facilities and Operations Policy EN23: Minerals Safeguarding Policy EN24: Minerals Buffer Zones	N/A
	Policy EN25: Sustainable Minerals Development	Ref: EN25.1: Extension to Hendre Quarry (Limestone) Ref: EN25.2: Extension to Pant y Pwll Dwr Quarry (Limestone)

Overarching Policy Areas	Policies	Allocation site associated with policy
		<p>Ref: EN25.3: Extension to Ddol Uchaf Quarry (Sand and Gravel)</p> <p>Ref: EN25.4: Extension within Fron Haul Quarry (Sand and Gravel)</p>
	<p>Policy EN26: Criteria for Minerals Development</p> <p>Policy EN27: Secondary and Recycled Aggregate</p>	N/A

2 THE HABITAT REGULATIONS ASSESSMENT PROCESS

2.1 Legislation and Guidance

2.1.1 This HRA is being made in accordance with the requirements of the following legislation and guidance:

- The Conservation of Habitats and Species Regulations 2017. In 2012, these Regulations were amended to transpose more clearly certain aspects of the Habitats Directive. In 2017, the Conservation of Habitats and Species Regulations 2017 (the “Habitats Regulations 2017”) consolidated and updated the Conservation of Habitats and Species Regulations 2010 (the “Habitats Regulations 2010”).
- European Commission, Managing Natura 2000 sites: The provisions of Article 6 of the Habitats Directive 92/43/EEC.
- European Commission, Guidance document on Article 6(4) of the Habitats Directive 92/43/EEC.
- Department for Communities and Local Government (2006) Planning for the Protection of European Sites: Appropriate Assessment. Guidance for Regional Spatial Strategies and Local Development Documents.
- Tyldesley D. and Chapman, C (2013) The Habitats Regulations Assessment Handbook (accessed July 2019) edition UK DTA Publications Limited www.dtapublications.co.uk.

2.2 Background to Habitats Regulations Assessment

2.2.1 Under Article 6 of the Habitats Directive (and Regulation 102 of the Habitats Regulations), an assessment is required where a land use plan may give rise to significant effects upon a Natura 2000 site (also known as a ‘European site’). These designated sites form part of the Natura 2000 network, which is a network of areas designated to conserve natural habitats and species that are rare, endangered, vulnerable or endemic within the European Community. This includes SACs, designated under the Habitats Directive for their habitats and/or species of European importance, and SPAs, classified under Directive 2009/147/EC on the Conservation of Wild Birds (the codified version of Directive 79/409/EEC as amended) for rare, vulnerable and regularly occurring migratory bird species and internationally important wetlands.

2.2.2 In addition, it is a matter of law that candidate SACs (cSACs) and Sites of Community Importance (SCI) are considered in this process; furthermore, it is Government policy that sites designated under the 1971 Ramsar Convention for their internationally important wetlands (Ramsar sites) and potential SPAs (pSPAs) are also considered.

2.2.3 The requirements of the Habitats Directive are transposed into English and Welsh law by means of the Conservation of Habitats and Species (Amendment) Regulations 2017 (Conservation of Habitats and Species Regulations, 2016).

2.2.4 Regulation 61, Part 6 of the Habitats Regulations states that:

‘A competent authority, before deciding to undertake, or give consent, permission or other authorisation for, a plan or project which (a) is likely to have a significant effect on a European 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, must make an appropriate assessment of the implications for that site in view of that site’s conservation objectives.’

2.2.5 Regulation 62, Part 6 of the Habitats Regulations states that:

‘If the competent authority are satisfied that, there being no alternative solutions, the plan or project must be carried out for imperative reasons of overriding public interest (which, subject to paragraph (2), may be of a social or economic nature), they may agree to the plan or project notwithstanding a negative assessment of the implications for the European site or the European offshore marine site (as the case may be).’

2.2.6 Regulation 66, Part 6 of the Habitats Regulations states that:

‘Where, in accordance with regulation 62 (considerations of overriding public interest)— (a) a plan or project is agreed to, notwithstanding a negative assessment of the implications for a European site or a European offshore marine site, or (b) a decision, or a consent, permission or other authorisation, is affirmed on review, notwithstanding such an assessment,— the appropriate authority must secure that any necessary compensatory measures are taken to ensure that the overall coherence of Natura 2000 is protected.’

2.2.7 The overarching aim of HRA is to determine, in view of a site’s conservation objectives and qualifying interests, whether a project, either in isolation and/or in combination with other projects, would have a significant adverse effect on the European site. If the Screening (the first stage of the process, see Section 2 for details) concludes that significant effects are likely, then Appropriate Assessment must be undertaken to determine whether there will be adverse effects on the site’s integrity.

2.2.8 It should be noted that where the need for mitigation is identified to reduce a likely significant effect, then such measures cannot be included at the Screening Stage and the potential effects must be considered at within an Appropriate Assessment (Court of Justice of the European Union (CJEU) judgement (People over Wind & Sweetman v Coillte Teoranta Case C-323/17)).

2.3 Stages in HRA

2.3.1 The requirements of the Habitats Directive comprise four distinct stages:

1. **Stage 1: Screening** is the process which initially identifies the likely impacts upon a European site of a project or plan, either alone or in combination with other projects or plans, and considers whether these impacts may have a significant effect on the integrity of the site’s qualifying habitats and/or species. It is important to note that the burden of evidence is to show, on the basis of objective information, that there will be no significant effect; if the effect may be significant, or is not known, that would trigger the need for an Appropriate Assessment. There is European Court of Justice case law to the effect that unless the likelihood of a significant effect can be ruled out on the basis of objective information, and adopting the precautionary principle, then an Appropriate Assessment must be made. The April 2018 CJEU judgement determined that mitigation to avoid or reduce harmful effects of the plan or project on a European site cannot be taken into account at the screening stage (Stage 1). Where such measures are required, a plan or project will require Appropriate Assessment to be undertaken (Stage 2).
2. **Stage 2: Appropriate Assessment** is the detailed consideration of the impact on the integrity of the European site of the project or plan, either alone or in combination with other projects or plans, with respect to the site’s conservation objectives and its structure and function. This is to determine whether or not there will be adverse effects on the integrity of the site. This stage also includes the development of mitigation measures to avoid or reduce any possible impacts.
3. **Stage 3: Assessment of alternative solutions** is the process which examines alternative ways of achieving the objectives of the project or plan that would avoid adverse impacts on the integrity of the European site, should avoidance or mitigation measures be unable to cancel out adverse effects.
4. **Stage 4: Assessment where no alternative solutions exist and where adverse impacts remain.** At Stage 4, an assessment is made with regard to whether or not the development is necessary for imperative reasons of overriding public interest (IROPI). If it is, this stage also involves detailed assessment of the compensatory measures needed to protect and maintain the overall coherence of the Natura 2000 network.

2.4 In combination Effects

2.4.1 As outlined in Section 2.4, it is necessary for HRA to consider in combination effects with other projects or plans.

2.4.2 Where an aspect of a project could have some effect on the qualifying feature(s) of a European site, but the effects of that aspect of the project alone would not be significant, the effects will need to be

checked in combination, firstly with other effects of the same project, and then with the effects of any other plans and projects.

- 2.4.3 If the prospect of cumulative effects cannot be eliminated, it is necessary to consider how the addition of effects from other projects or plans may produce a combined adverse effect on a European site that would be significant. Taking the effects which would not be likely to be significant alone, it is necessary to make a judgement as to whether these effects would be made more likely or more significant if the effects of other projects or plans are added to them. Most cumulative effects can be identified by way of the following characteristics. Could additional effects be cumulative because they would:
- a. Increase the effects on the qualifying features in an additive, or synergistic way?
 - b. Increase the sensitivity or vulnerability of the qualifying features of the site affected by the project proposals?
 - c. Be felt more intensely by the same qualifying features over the same area (a layering effect), or by the same qualifying feature over a greater (larger) area (a spreading effect), or by affecting new areas of the same qualifying feature (a scattering effect)?
- 2.4.4 In accordance with Tyldesley D. and Chapman, C (2013) The Habitats Regulations Assessment Handbook (accessed July 2019) edition UK DTA Publications Limited www.dtapublications.co.uk, it will be necessary to look for projects and plans at the following stages:
- a. Applications lodged but not yet determined.
 - b. Projects subject to periodic review e.g. annual licences, during the time that their renewal is under consideration.
 - c. Refusals subject to appeal procedures and not yet determined.
 - d. Projects authorised but not yet started.
 - e. Projects started but not yet completed.
 - f. Known projects that do not require external authorisation.
 - g. Proposals in adopted plans.
 - h. Proposals in finalised draft plans formally published or submitted for final consultation, examination or adoption.
- 2.4.5 Plans under consideration may range from neighbouring authorities' planning documents down to sector-specific strategic plans on such topics as flood risk.
- 2.4.6 A review has been undertaken of projects and plans with the potential for an in combination effect with the proposed development.

2.5 Definition of Significant Effects

- 2.5.1 A critical part of the HRA screening process is determining whether or not the proposals are likely to have a significant effect on European sites and, therefore, if they will require an Appropriate Assessment. Judgements regarding significance should be made in relation to the qualifying interests for which the site is of European importance and also its conservation objectives. A useful definition of 'likely' significant effects is as follows:
- '...likely means readily foreseeable not merely a fanciful possibility; significant means not trivial or inconsequential but an effect that is potentially relevant to the site's conservation objectives'* (Welsh Assembly Government, 2006).
- 2.5.2 In considering whether the project is likely to have a significant effect on a European site, a precautionary approach must be adopted:
- The project should be considered 'likely' to have such an effect if the applicant is unable (on the basis of objective information) to exclude the possibility that the project could have significant effects on any European site, either alone or in combination with other plans or projects.
 - An effect will be 'significant' in this context if it could undermine the site's conservation objectives. The assessment of that risk must be made in the light of factors such as the characteristics and specific environmental conditions of the European site in question.

2.6 Approach to the HRA Report

2.6.1 This HRA Report takes into account the requirements of the Habitats Regulations and relevant guidance produced by David Tyldesley (Tyldesley D. and Chapman, C (2013) The Habitats Regulations Assessment Handbook (accessed July 2019) edition UK DTA Publications Limited www.dtapublications.co.uk).

2.6.2 The following stages have been completed:

- Identification of all European sites potentially affected (including those outside of the proposed development boundary);
- A review of each European site, including the features for which the site is designated, the Conservation Objectives, and an understanding of the current conservation status and the vulnerability of the individual features to threats;
- A review of the proposals which have the potential to affect the European sites, and whether the sites are vulnerable to these effects; and
- A consideration of any potential impacts in combination with other projects (or plans).

3 IDENTIFYING THE EUROPEAN SITES

3.1 Approach to Identifying Sites

3.1.1 All European sites which may be affected by proposed development (through an identifiable impact pathway) have been considered from within 20 km of the borough boundary.

3.2 European Sites identified

3.2.1 Twenty-three European sites have been identified. A list of the sites together with their status and location is presented in Table 2. Figure 1, Appendix B also shows the locations of the European sites identified within and adjacent to the district boundary.

Table 2: Summary of European Sites

Name of Site	Identification Number	Status	Distance from Flintshire boundary (approximate km)
Dee Estuary	UK00082	Ramsar site	Within
Dee Estuary	UK9013011	SPA	Within
Dee Estuary	UK0030131	SAC	Within
Deeside and Buckley Newt sites	UK0030132	SAC	Within
Halkyn Mountain	UK0030163	SAC	Within
Alyn Valley Woods	UK0030078	SAC	Within
Liverpool Bay	UK9020294A	SPA	Marine SPA adjacent to the northwest boundary
River Dee and Bala Lake	UK0030252	SAC	Adjacent to southeast boundary
Berwyn a Mynyddoedd De Clwyd / Berwyn and South Clwyd Mountains	UK0012926	SAC	Adjacent to the southern boundary
Berwyn	UK9013111	SPA	Adjacent to the southern boundary
Llwyn	UK0030185	SAC	5
Coedwigoedd Dyffryn Elwy / Elwy Valley Woods	UK0030146	SAC	7
Johnstown Newt Sites	UK0030173	SAC	7
Mersey narrows & north Wirral foreshore	UK11042	Ramsar site	7.2
Mersey narrows & north Wirral foreshore Ramsar site	UK9020287	SPA	7.2
Mersey Estuary	UK11041	Ramsar site	9.4
Mersey Estuary	UK9005131	SPA	9.4

Name of Site	Identification Number	Status	Distance from Flintshire boundary (approximate km)
Ribble and Alt Estuaries	UK11057	Ramsar site	18.9
Ribble and Alt Estuaries	UK9005103	SPA	18.9
Midland Meres and Moses Phase 1	UK11043	Ramsar site	24.5
Midland Meres and Moses phase 2	UK11080	Ramsar site	4.7
Oak Mere	UK0012970	SAC	18.5
Sefton Coast	UK0013076	SAC	18.7

4 INITIAL SCREENING

4.1 Screening Approach

- 4.1.1 The screening process has been split into two stages, initial screening and detailed screening.
- 4.1.2 The initial screening stage has provided a high-level screening assessment to determine if the LDP could possibly lead to significant adverse effects on European sites identified in Section 3. The purpose of this was to eliminate those policies and sites from the assessment which very clearly would not affect European sites in order to focus on those policies and sites where there was potential for effects or uncertainty about potential effects.
- 4.1.3 When identifying the elements of the LDP that could potentially affect European sites, it was important to focus upon those elements that would have the greatest likelihood of impacting the sites. The definition of significance identified in Section 2.5 was very important for the detailed screening.
- 4.1.4 The LDP is intended to be read as a single document rather than a series of separate policies and has been assessed as such. Proposals in one area of the LDP may mitigate potentially damaging activities promoted in another area and should be understood in the wider context of the Plan's aims and purposes.
- 4.1.5 The sections below outline the initial and detailed screening of the LDP.

4.2 European sites

- 4.2.1 European sites screened out in the initial screening comprised those European sites where there was no clear link, or conceivable impact pathway between the European sites and the policies/sites set out within the LDP. Those European sites with the potential for Likely Significant Effects (LSE) as a result of implementation of the LDP, or those European sites for which impacts were uncertain, were carried forward into the more detailed screening assessment.

European sites screened in

- 4.2.2 Five European sites have been screened in for further assessment. These are listed in Table 3, and are shown on Figure 1, Appendix B. Details of the qualifying features of each of these European sites are shown below.

Table 3: Summary of European Sites screened in

Name of Site
Dee Estuary SPA
Dee Estuary SAC
Dee Estuary Ramsar site
River Dee and Bala Lake SAC
Deeside and Buckley Newt SAC

Dee Estuary SPA

The site citation (JNCC, 2001) provides the species and numbers of birds which form qualifying features of features of the SPA, these are provided in

4.2.3 Table 4, below. The citation specifies these species in their non-breeding, over-wintering state.

Table 4: Qualifying Features of the Dee Estuary SPA

Species	Count
---------	-------

This site qualifies under Article 4.1 of the Directive (79/409/EEC) by supporting populations of European importance of the following species listed on Annex I of the Directive:

Breeding;	
Little Tern <i>Sterna albifrons</i>	56 pairs representing at least 2.3% of the breeding population in Great Britain (RSPB, 5 year mean 1991-95)
Common Tern <i>Sterna hirundo</i>	277 pairs representing at least 2.3% of the breeding population in Great Britain (5 year mean 1991-95)
On passage;	
Sandwich Tern <i>Sterna sandvicensis</i>	818 individuals representing at least 5.8% of the population in Great Britain (5 year mean 1991-95)
Overwinter;	
Bar-tailed Godwit <i>Limosa lapponica</i>	1,013 individuals representing at least 1.9% of the wintering population in Great Britain (5 year peak mean 1991/2 - 1995/6)

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

On passage;	
Redshank <i>Tringa totanus</i>	8,451 individuals representing at least 4.8% of the Eastern Atlantic - wintering population (5 year peak mean 1991/2 - 1995/6)
Over winter;	
Black-tailed Godwit <i>Limosa limosa islandica</i>	1,739 individuals representing at least 2.5% of the wintering Iceland - breeding population (5 year peak mean 1991/2 - 1995/6)
Curlew <i>Numenius arquata</i>	4,028 individuals representing at least 1.2% of the wintering Europe - breeding population (5 year peak mean 1991/2 - 1995/6)
Dunlin <i>Calidris alpina alpina</i>	22,479 individuals representing at least 1.6% of the wintering Northern Siberia/Europe/Western Africa population (5 year peak mean 1991/2 - 1995/6)
Grey Plover <i>Pluvialis squatarola</i>	2,193 individuals representing at least 1.5% of the wintering Eastern Atlantic - wintering population (5 year peak mean 1991/2 - 1995/6)
Knot <i>Calidris canutus</i>	21,553 individuals representing at least 6.2% of the wintering North eastern Canada/Greenland/Iceland/North western Europe population (5 year peak mean 1991/2 - 1995/6)
Oystercatcher <i>Haematopus ostralegus</i>	28,434 individuals representing at least 3.2% of the wintering Europe & Northern/Western Africa population (5 year peak mean 1991/2 - 1995/6)
Pintail <i>Anas acuta</i>	6,498 individuals representing at least 10.8% of the wintering North western Europe population (5 year peak mean 1991/2 - 1995/6)

Species	Count
Redshank <i>Tringa totanus</i>	6,382 individuals representing at least 4.3% of the wintering Eastern Atlantic - wintering population (5 year peak mean 1991/2 - 1995/6)
Shelduck <i>Tadorna tadorna</i>	6,827 individuals representing at least 2.3% of the wintering North western Europe population (5 year peak mean 1991/2 - 1995/6)
Teal <i>Anas crecca</i>	5,918 individuals representing at least 1.5% of the wintering North western Europe population (5 year peak mean 1991/2 - 1995/6)

Assemblage qualification: A wetland of international importance.

The area qualifies under Article 4.2 of the Directive (79/409/EEC) by regularly supporting at least 20,000 waterfowl.

Over winter, the area regularly supports 130,408 individual waterfowl (5 year peak mean 1991/2 - 1995/6) including: Black-tailed Godwit, Shelduck, Teal, Pintail, Oystercatcher, Grey Plover, Bar-tailed Godwit *Limosa lapponica*, Dunlin, Sanderling *Calidris alba*, Curlew, Redshank, Cormorant *Phalacrocorax carbo*, Wigeon *Anas penelope*, Mallard *Anas platyrhynchos*, Lapwing *Vanellus vanellus*, Knot.

Dee Estuary Ramsar site

4.2.4 The site citation (JNCC, 2011) provides the species and numbers of birds which form qualifying features of the Ramsar site, these are provided in Table 5.

Table 5: Qualifying Features of the Dee Estuary Ramsar site

Species	Count
Ramsar criterion 1:	
Extensive intertidal mud and sand flats (20 km by 9 km) with large expanses of saltmarsh towards the head of the estuary. Habitats Directive Annex I features present on the pSAC include:	
H1130 Estuaries	
H1140 Mudflats and sandflats not covered by seawater at low tide	
H1210 Annual vegetation of drift lines	
H1230 Vegetated sea cliffs of the Atlantic and Baltic coasts	
H1310 <i>Salicornia</i> and other annuals colonising mud and sand	
H1330 Atlantic salt meadows (<i>Glauco-Puccinellietalia maritima</i>)	
H2110 Embryonic shifting dunes	
H2120 Shifting dunes along the shoreline with <i>Ammophila arenaria</i> ("white dunes")	
H2130 Fixed dunes with herbaceous vegetation ("grey dunes")	
H2190 Humid dune slacks	
Ramsar criterion 2:	
It supports breeding colonies of the vulnerable Natterjack Toad, <i>Epidalea calamita</i>	
Ramsar criterion 5:	
Assemblages of international importance:	
Species with peak counts in winter:	

Species	Count
Non-breeding season regularly supports 120,726 individual waterbirds (5 year peak mean 1994/5 – 1998/9).	

Ramsar criterion 6:

Species/populations occurring at levels of international importance.

Qualifying Species/populations (as identified at designation):

Species with peak counts in spring/autumn:

Redshank, <i>Tringa totanus</i> ,	8,795 individuals, representing an average of 5.9% of the Eastern Atlantic population (5 year peak mean 1994/95 - 1998/99)
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Species with peak counts in winter:

Teal, <i>Anas crecca</i> , NW Europe	5,251 individuals, representing an average of 1.3% of the population (5 year peak mean 1994/95 - 1998/99)
Shelduck, <i>Tadorna tadorna</i> , NW Europe	7,725 individuals, representing an average of 2.6% of the population (5 year peak mean 1994/95 - 1998/99)
Oystercatcher, <i>Haematopus ostralegus</i> , Europe & W Africa	22,677 individuals, representing an average of 2.5% of the population (5 year peak mean 1994/95 - 1998/99)
Curlew, <i>Numenius arquata</i> Europe/NW Africa	3,899 individuals, representing an average of 1.1% of the Europe population (5 year peak mean 1994/95 - 1998/99)
Pintail, <i>Anas acuta</i> , NW Europe	5,407 individuals, representing an average of 9.0% of the population (5 year peak mean 1994/95 - 1998/99)
Grey plover, <i>Pluvialis squatarola</i> , E Atlantic	1,643 individuals, representing an average of 1.1% of the GB population (5 year peak mean 1994/95 - 1998/99)
Knot, <i>Calidris canutus islandica</i> , W Europe/ Canada	12,394 individuals, representing an average of 3.5% of the GB population (5 year peak mean 1994/95 - 1998/99)
Dunlin, <i>Calidris alpina alpina</i> Europe (breeding)	27,769 individuals, representing an average of 2.0% of the population (5 year peak mean 1994/95 - 1998/99)
Black-tailed godwit, <i>Limosa limosa islandica</i> , Iceland (breeding)	1,747 individuals, representing an average of 2.5% of the population (5 year peak mean 1994/95 - 1998/99)
Bar-tailed godwit, <i>Limosa lapponica</i> , W European (wintering)	1,150 individuals, representing an average of 1.2% of the Europe population (5 year peak mean 1994/95 - 1998/99)
Redshank, <i>Tringa totanus</i> , Eastern Atlantic	5,293 individuals representing an average of 3.5% Eastern Atlantic population (5 year peak mean 1994/95 - 1998/99)

Contemporary data and information on waterbird trends at this site and their regional (sub-national) and national contexts can be found in the Wetland Bird Survey report, which is updated annually. See www.bto.org/survey/webs/webs-alerts-index.htm.

Details of bird species occurring at levels of National importance are given in Section 22.

Dee Estuary SAC

- 4.2.5 The site citation (JNCC, 2015(a)) provides the habitats and species which form qualifying features of the SAC, these are provided in Table 6, below.

Table 6: Qualifying Features of the Severn Estuary SAC

Qualifying habitats and species

Annex I habitats that are a primary reason for selection of this site:

- 1140 Mudflats and sandflats not covered by seawater at low tide
- 1310 Salicornia and other annuals colonizing mud and sand
- 1330 Atlantic salt meadows (*Glauco-Puccinellietalia maritimae*)

Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site:

- 1130 Estuaries
- 1210 Annual vegetation of drift lines
- 1230 Vegetated sea cliffs of the Atlantic and Baltic Coasts
- 2110 Embryonic shifting dunes
- 2120 "Shifting dunes along the shoreline with *Ammophila arenaria* ("white dunes")"
- 2130 "Fixed coastal dunes with herbaceous vegetation ("grey dunes")"
- 2190 Humid dune slacks

Annex II species that are a primary reason for selection of this site:

Not applicable

Annex II species present as a qualifying feature, but not a primary reason for site selection:

- 1095 Sea lamprey *Petromyzon marinus*
- 1099 River lamprey *Lampetra fluviatilis*
- 1395 Petalwort *Petalophyllum ralfsii*

River Dee and Bala Lake SAC

- 4.2.6 The site citation (JNCC, 2015(c)) provides the habitats and species which form qualifying features of the SAC, these are provided in Table 7, below.

Table 7: Qualifying Features of the River Dee and Bala Lake SAC

Qualifying habitats and species

Annex I habitats that are a primary reason for selection of this site:

- 3260 Water courses of plain to montane levels with the *Ranunculus fluitantis* and *Callitriche-Batrachion* vegetation

Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site:

Not applicable

Annex II species that are a primary reason for selection of this site:

- Atlantic salmon *Salmo salar*

Qualifying habitats and species

1831 Floating water-plantain *Luronium natans*

Annex II species present as a qualifying feature, but not a primary reason for site selection:

1095 Sea lamprey *Petromyzon marinus*

1096 Brook lamprey *Lampetra planeri*

1099 River lamprey *Lampetra fluviatilis*

1163 Bullhead *Cottus gobio*

1355 Otter *Lutra lutra*

Deeside and Buckley Newt SAC

- 4.2.7 The site citation (JNCC, 2015(c)) provides the habitats and species which form qualifying features of the SAC, these are provided in Table 8, below.

Table 8: Qualifying Features of the Deeside and Buckley Newt SAC

Qualifying habitats and species

Annex I habitats that are a primary reason for selection of this site:

Not applicable

Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site:

91A0 Old sessile oak woods with *Ilex* and *Blechnum* in the British Isles

Annex II species that are a primary reason for selection of this site:

1166 Great crested newt *Triturus cristatus*

Annex II species present as a qualifying feature, but not a primary reason for site selection:

Not applicable

Conservation Objectives of the European Sites screened in

- 4.2.8 Under Regulation 35(3) of the Conservation of Habitats and Species Regulations 2017 (as amended) the appropriate statutory nature conservation body (in this case NRW) has a duty to communicate the conservation objectives for a European site to the relevant/competent authority responsible for that site. The information provided under Regulation 35 must also include advice on any operations which may cause deterioration of the features for which the site is designated.
- 4.2.9 The conservation objectives for a European site are intended to represent the aims of the Habitats and Birds Directives in relation to that site. To this end, habitats and species of European Community importance should be maintained or restored to 'favourable conservation status' (FCS), as defined in Article 1 of the Habitats Directive below:

The conservation status of a natural habitat will be taken as 'favourable' when:

- *Its natural range and the area it covers within that range are stable or increasing;*
- *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*
- *Conservation status of typical species is favourable as defined in Article 1(i).*

The conservation status of a species 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;*
- *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.*

4.2.10 Guidance from the European Commission indicates that the Habitats Directive intends FCS to be applied at the level of an individual site, as well as to habitats and species across their European range. Therefore, in order to properly express the aims of the Habitats Directive for an individual site, the conservation objectives for a site are essentially to maintain (or restore) the habitats and species of the site at (or to) FCS.

European sites screened out

4.2.11 European sites screened out comprised those European sites where there was no realistic link, or conceivable impact pathway between the European sites and the policies/sites set out within the LDP. A justification for screening out European sites is presented in Table 9.

Table 9: Summary of European Sites screened out

Name of Site	Justification for screening out
Mersey narrows & north Wirral foreshore Ramsar site/ SPA	The qualifying features of this site comprise bar-tailed godwit, common tern, knot and little gull. No element of the Local Plan would impact on these species given their preference for foreshore habitats. Due to the distance of the SPA/Ramsar site from the County boundary (8 km) potential impacts associated with: hydrological links, air quality, direct habitat loss, recreational pressure and disturbance/ displacement of birds during the construction phase of new development within Flintshire have also been screened out of further assessment.
Mersey Estuary Ramsar site/ SPA	The qualifying features of these sites comprise shelduck, black-tailed godwit, redshank, Eurasian teal, northern pintail and dunlin. No element of the Local Plan would impact on these species given their preference for foreshore habitats. Due to the distance of the SPA/ Ramsar site from the County boundary (9 km) potential impacts associated with: hydrological links, air quality, direct habitat loss, recreational pressure and disturbance/ displacement of birds during the construction phase of new development within Flintshire have also been screened out of further assessment.
Ribble and Alt Estuaries Ramsar site/ SPA	Given the distance of SPA/ Ramsar site from the County boundary (26 km from the nearest allocation) potential impacts associated with: hydrological links, air quality, direct habitat loss, recreational pressure, loss of functionally linked land, disturbance/ displacement of birds using functionally linked land adjacent to development and disturbance/ displacement of birds during the construction phase of new development within Flintshire have been screened out of further assessment.
Midland Meres and Moses phase 1 Ramsar site	The qualifying features of this site comprise a range of wetland habitats including open water and raised bog, and a number of rare plants and invertebrates associated with these habitats. The site is approximately

Name of Site	Justification for screening out
	<p>25 km from the nearest allocation and there are no hydrological links between them or any other allocation within the authority.</p> <p>Given the distance of SAC from the County boundary (20 km) potential impacts associated with: air quality, direct habitat loss, and recreational pressure have also been screened out of further assessment.</p>
<p>Midland Meres and Moses phase 2 Ramsar site</p>	<p>This site is also designated for its wetland habitats and the plant and invertebrate species that it supports. It consists of a number of isolated parcels, the majority of which are the other side of Wrexham from any allocation. The closest parcel is approximately 6.3 km from the nearest allocation and separated by a major road and railway. There are no hydrological links between the site and any allocation.</p> <p>Given the distance of SAC from the County boundary (5 km) potential impacts associated with: air quality, direct habitat loss, and recreational pressure have also been screened out of further assessment.</p>
<p>Oak Mere SAC</p>	<p>The site's qualifying features include oligotrophic waters, transition mires and quaking bogs. Its approximately 24 km from the nearest allocation with no hydrological links between this or any allocation.</p> <p>Due to the distance of SAC from the County boundary (18 km) potential impacts associated with: hydrological links, air quality, direct habitat loss, and recreational pressure have been screened out of further assessment.</p>
<p>Sefton Coast SAC</p>	<p>The qualifying features of this site comprise dune habitats supporting petalwort and great crested newt. The site is approximately 28 km from the nearest allocation. Given the distance of SAC from the County boundary (19 km) potential impacts associated with: hydrological links, air quality, direct habitat loss, and recreational pressure have been screened out of further assessment.</p>
<p>Coedwigoedd Dyffryn Elwy / Elwy Valley Woods SAC</p>	<p>The qualifying features of the site comprise Tilio-Acerion forests of slopes, screes and ravines habitat. Given the distance of SAC from the County boundary (7 km) potential impacts associated with: hydrological links, air quality, direct habitat loss, and recreational pressure have been screened out of further assessment.</p>
<p>Johnstown Newt Sites SAC</p>	<p>The qualifying feature of this site is great crested newt. Given the distance of SAC from the County boundary (7 km) potential impacts on the great crested newt population have been screened out of further assessment.</p>
<p>Llwyn SAC</p>	<p>The qualifying feature of the site comprises Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> habitat. Given the distance of SAC from the County boundary (5 km) potential impacts associated with: hydrological links, air quality, direct habitat loss, and recreational pressure have been screened out of further assessment.</p>
<p>Halkyn Mountain SAC</p>	<p>The qualifying features of this site comprise grassland habitat supporting great crested newt. Although this site is within the district boundary it is approximately 3 km from the nearest allocation with no hydrological links to this or any allocation. This site has been screened out of further assessment.</p>

Name of Site	Justification for screening out
Alyn Valley Woods SAC	The qualifying features of this site comprise forest, grassland and scrubland habitats. This site is within the district boundary and is approximately 2.5 km from its nearest allocation. Although the site is directly linked to this allocation via the River Alyn, the allocation is downstream of the SAC and therefore any major pollution event would not impact on these features. This site has been screened out of further assessment.
Berwyn a Mynyddoedd De Clwyd / Berwyn and South Clwyd Mountains SAC	The primary qualifying features of this site include European dry heath and blanket bog habitats. The site is 12.4 km from the authority boundary and there are no direct hydrological pathways linking this site to the authority. This site has been screened out of further assessment.
Berwyn SPA	This site overlaps with Berwyn and South Clwyd Mountains (above). Its qualifying features include hen harrier, merlin and peregrine (breeding). The site is 12.4 km from the authority boundary. Given the distance of the SPA from Flintshire, no likely significant potential impact pathways have been identified. This site has been screened out of further assessment.
Liverpool Bay SPA	This site is located adjacent to the northern authority boundary. It is classified for the protection of red-throated diver, common scoter, and little gull in the non-breeding season; common tern and little tern in the breeding season, and an internationally important waterbird assemblage. Given that the qualifying birds of the SPA are marine foraging species, no elements of the LDP would have a likely significant effect on the SPA. This site has been screened out of further assessment.

4.3 Initial screening of policies and allocations within the LDP

- 4.3.1 Policies screened out in the initial screening were generally those that could not lead to 'direct development' or could have no impact pathway to any of the European sites identified. This included policies which directly seek to protect the local historic and natural environment, or those which support the implement other policies and therefore could not directly affect European sites. All of the policies screened out of the detailed assessment are not directly linked to allocation sites.
- 4.3.2 As set out with the DTA HRA Guidance (Part F)¹, each of the polices within the LDP have been reviewed against the following list of screening categories.

Table 10: Screening Assessment Categories

Category	Description
Category A:	General statements of policy/general aspirations. Policies which are no more than general statements of policy or general political aspirations should be screened out because they cannot have a significant effect on a site.
Category B:	Policies listing general criteria for testing the acceptability/sustainability of proposals. These general policies cannot have any effect on a European site and should be screened out.
Category C:	Proposal referred to but not proposed by the plan. Screen out any references to specific proposals for projects, such as those which are identified, for example, in higher policy frameworks such as the Wales Spatial Plan or National Policy Statements, relating perhaps to nationally

¹ Tyldesley D. and Chapman, C (2013) The Habitats Regulations Assessment Handbook (accessed July 2019) edition UK DTA Publications Limited www.dtapublications.co.uk

Category	Description
	<p>significant infrastructure projects. These will be assessed by the Secretary of State or Welsh Ministers. A useful 'test' as to whether a project should be screened out in this step is to ask the question:</p> <p>'Is the project provided for/proposed as part of another plan or programme and would it be likely to proceed under the other plan or programme irrespective of whether this subject plan is adopted with or without reference to it?'</p> <p>If the answer is 'yes' it will normally be appropriate to screen the project out in this step.</p>
Category D:	<p>General plan-wide environmental protection/site safeguarding/ threshold policies. These are policies, the obvious purpose of which is to protect the natural environment, including biodiversity, or to conserve or enhance the natural, built or historic environment, where enhancement measures will not be likely to have any adverse effect on a European Site. They can be screened out because the implementation of the policies is likely to protect rather than adversely affect European sites and not undermine their conservation objectives.</p>
Category E:	<p>Policies or proposals that steer change in such a way as to protect European sites from adverse effects. These types of policies or proposals will have the effect of steering change away from European sites whose qualifying features may be affected by the change and they can therefore be screened out.</p>
Category F:	<p>Policies or proposals that cannot lead to development or other change. Policies that do not themselves lead to development or other change, for example, because they relate to design or other qualitative criteria for development, such as materials for new development. They do not trigger any development or other changes that could affect a European site and can be screened out.</p>
Category G:	<p>Policies or proposals that could not have any conceivable adverse effect on a site. Policies which make provision for change, but which could have no conceivable effect on a European site, because there is no causal connection or link between them and the qualifying features of any European site and can therefore be screened out.</p>
Category H:	<p>Policies or proposals the (actual or theoretical) effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects). Policies or proposals which make provision for change but which could have no significant effect on a European site, either alone or in combination with other aspects of the same plan, or in combination with other plans or projects, can be screened out. These may include cases where there are some potential effects which (and theoretically even in combination) would plainly be insignificant and could not undermine the conservation objectives.</p>
Category I:	<p>Policies or proposals which may have a significant effect on a site alone. Policies or proposals which are likely to have a significant effect on a European site alone, should be screened in.</p>
Category J:	<p>Policies or proposals unlikely to have a significant effect alone. These aspects of the plan would have some effect on a site, but the effect would not be likely to be a significant effect; so they must be checked for in combination (cumulative) effects. They will then be re-categorised as either Category K (no significant effect in combination) or Category L (likely to have a significant effect in combination), as explained below.</p>
Categories K and L:	<p>Policies or proposals unlikely to have a significant effect either alone or in combination (K) or likely to have a significant effect in combination (L) after the in-combination test. Where an aspect of a plan could have some effect on the qualifying feature(s) or a European site, but the effects of that aspect of the plan alone would not be significant, the effects of that aspect of the plan will need to be checked in combination firstly, with other effects of the same plan, and then with the effects of other plans and projects.</p>

Category	Description
	i.e. policies or proposals which will have no likely significant effect alone or in combination are classified as Category K. Policies or proposals which are likely to have a significant effect in combination are classified as Category L. Category L policies or proposals will require further consideration in terms of potential in combination effects. Firstly, this will be with regard to other aspects of the Plan itself, and subsequently with other separate plans or projects, for example neighbouring Local Plans.
Category M:	<p>Bespoke area, site or case specific policies or proposals intended to avoid or reduce harmful effects on European sites.</p> <p>Policies or proposals which have been included in the plan with the intension of avoiding or reducing effects on specific European site(s) whose qualifying features may otherwise be affected by the plan being implemented.</p>

4.3.3 Based on the categories set out within Table 10, 74 policies have been screened out of further assessment. Table 11 provides a summary of the screening exercise. Justification for the conclusions is included within Table 11. The remaining policies (which all link to allocation sites) have been carried forward into the detailed screening. All allocations listed within the LDP have been carried through to detailed screening.

Table 11: Screening of LDP policies

LDP Policies	Justification	Conclusion
STR1: Strategic Growth	This policy confirms Flintshire's economic ambition for the plan period. This policy is aspirational and would not lead directly to impacts on European sites.	Category A (Screened out)
STR2: The Location of Development	This policy provides details of the areas where new development will be directed during the plan period. This policy is aspirational and would not lead directly to impacts on European sites.	
STR5: Transport and Accessibility PC5: Transport and Accessibility PC6: Active Travel	These policies provide details of how new development can only be delivered by <i>the maintenance and enhancement of an integrated, accessible, usable, safe and reliable transport network (ST5) and must be supported by appropriate transport infrastructure, and depending on the nature, scale, location and siting of the proposal (PC5)</i> . New development proposals should also <i>ensure that people have access to employment, education, healthcare and other essential services and facilities (PC6)</i> . These are general statements of policy and will not impact on European sites.	
STR6: Services, Facilities and Infrastructure	This policy set outs the aspirations for community planning and do not directly link to development. This is a general statement of policy and will not impact on European sites.	
STR7: Economic Development, Enterprise and Employment STR8: Employment Land Provision	Policy STR6 details how Flintshire will sustain its role as a sub-regional economic hub and Policy STR8 details how land will be provided for employment during the plan period. These are general statements of policy and will not impact on European sites.	
STR11: Provision of Sustainable Housing Sites	This policy confirms the council's commitment in favour of sustainable development that would not impact on European sites.	

PC1: The Relationship of Development to Settlement Boundaries	This policy sets out where development will be permitted within settlement boundaries. This is a general statement of policy and will not impact on European sites.	
PC8: Airport Safeguarding Zone	This is a safeguarding policy. <i>Development will not be permitted which would prejudice the safe and efficient operation of Hawarden Airport.</i> This is a general statement of policy and will not impact on European sites.	
EN23: Minerals Safeguarding	This is a safeguarding policy. This is a general statement of policy to accompany Policy STR16 and will not impact on European sites.	
PE7: Retail Centre Hierarchy	This policy sets out where retail, leisure and commercial development will be directed. This policy is aspirational and would not lead directly to impacts on European sites.	
PC2: General Requirements for Development PC4: Sustainability and Resilience of New Development	These policies detail the general requirements (PC2) and sustainability criteria (PC4) which all new developments must adhere to. Implementing these policies will not affect European sites.	
PC7: Passenger Transport	This policy sets out the criteria which new development must adhere to, to promote the use of passenger transport. Implementing this policy will not affect European sites.	
PC9: Protection of Disused Railway Lines	This policy confirms the Council's commitment to protect existing disused railway lines for the purposes of walking, cycling, horse riding or other transport schemes. Implementing this policy will not affect European sites.	
PE3: Employment Development Outside Allocated Sites and Principal Employment Areas	This policy sets out the criteria which must be met in order to develop employment land outside of the allocations within the LDP. However, the policy itself would not lead to development. Implementing this policy will not affect European sites.	
PE5: Expansion of Existing Employment uses PE6: Protection of Employment Land	These policies outline the criteria which must be met by developers wanting to extend existing employment sites (PE5) or wanting to change the use of an existing employment site (PE6). Implementing this policy will not affect European sites.	Category B (Screened out)
PE13: Caravan Development in the Open Countryside	This policy sets the criteria for the location of new caravan sites in the countryside but does not itself lead to development. Implementing this policy will not affect European sites.	
HN5: House Extensions and Alterations HN6: Annex Accommodation HN7: Houses in Multiple Occupation	These policies set the criteria for new development associated with extensions to existing premises (HN5), new annexes to existing buildings (HN6), and conversions of existing buildings into one or more dwellings (HN7). Implementing this policy will not affect European sites.	
EN1: Sports, Recreation and Cultural Facilities	This policy relates to protection of existing facilities and circumstances under which these can be changed. Implementing this policy will not affect European sites.	
EN3: Undeveloped Coast and Dee Estuary Corridor	This policy sets out the criteria which must be met in relation to potential development along the coast but does not itself lead to	

	development. Implementing this policy will not affect European sites	
EN17: Development of Unstable Land	This policy ensures that development is not permitted in areas subject to instability due to mining, landfill, landslides, erosion, or other subsidence. Implementing this policy will not affect European sites.	
EN22: Criteria for Waste Management Facilities and Operations	This policy sets out the criteria which Waste Management Facilities must adhere to but does not itself lead to development. Implementing this policy will not affect European sites.	
EN26: Criteria for Minerals Development	This policy relates to the criteria which future minerals development projects must adhere to but does not itself lead to development. Implementing this policy will not affect European sites.	
EN20: Landfill Buffer Zone	These policies protect existing development from landfill and minerals development. Neither policy would lead to development.	
EN24: Minerals Buffer Zones	Implementing this policy will not affect European sites	
EN27: Secondary and Recycled Aggregate	This policy relates to criteria which must be met for any proposals for the management of secondary and recycled aggregates. The policy itself will not lead to development. Implementing this policy will not affect European sites.	
STR12: Provision for Gypsies and Travellers HN9: Gypsy and Traveller Accommodation	<p>These policies relate to accommodation for gypsies and travellers. Policy STR12 states that <i>appropriate, site specific provision of socially rented and private pitches, extension of existing private sites, provision for transit and stopping places, and a criteria-based policy to judge the appropriateness of planning applications for new sites as they arise.</i></p> <p>These policies set criteria for the location of gypsy and travellers sites but do not directly link to development. Implementing this policy will not affect European sites.</p>	
PC10: New Transport Schemes	This policy safeguards three transport scheme. These are referred to, but not proposed in the LDP. These schemes are identified in higher policy frameworks and can therefore be screened out of further assessment.	Category C (Screened out)
STR13: Natural and Built Environment, Green Networks and Infrastructure STR14: Climate Change and Environmental Protection EN2: Green Infrastructure EN5: Area of Outstanding Natural Beauty EN6: Sites of Biodiversity Importance EN7: Development Affecting Trees, Woodland and Hedgerows EN8: Built Historic Environment and Listed Buildings	<p>These policies are designed to protect and enhance (where possible) the natural and cultural environment within Flintshire</p> <p>The implementation of these policies is considered to have no adverse impacts and potentially some beneficial effects on European sites.</p>	Category D (Screened out)

EN9: Development in or Adjacent to Conservation Areas EN10: Buildings of Local Interest EN11: Green Barriers		
STR4: Principles of Sustainable Development, Design and Placemaking STR15: Waste Management STR16: Strategic Planning for Minerals EN4: Landscape Character EN12: New Development and Renewable and Low Carbon Energy Technology EN14: Flood Risk EN15: Water Resources EN18: Pollution and Nuisance EN19: Managing Waste Sustainably EN21: Locations for Waste Management Facilities	These policies are designed to steer change in such a way as to protect European sites from adverse effects. The implementation of these policies is considered to have no adverse impacts and potentially some beneficial effects on European sites.	Category E (Screened out)
PC3: Design HN2: Density and Mix of Development HN3: Affordable Housing	These policies set the criteria which new developments must adhere to in relation to the density and mix of housing (HN2), the proportion of affordable housing (HN3) and the design quality of new development (PC3). Implementing these policies will not affect European sites.	Category F (Screened out)
STR9: Retail Centres and Development PE9: Development Outside Primary Shopping Areas PE10: District and Local Centres PE11: Edge and Out of Town Retail Development	Policy STR9 seeks <i>to maintain and enhance the vibrancy, viability and attractiveness of Flintshire's town, district, and local centres, supporting the delivery of appropriate comparison and convenience retail, office, leisure, entertainment and cultural facilities.</i> Policies PE9, 10, 11 and 12 outline the areas where development within regional, district and local centres will be directed. These policies state that all new development within urban locations will be directed towards town centres and edge of existing settlement. There would be no likely significant effects of this type of development on European sites.	
PE4: Farm Diversification	This policy supports farm diversification through development of existing farm complexes. Any such development would be <i>small-scale and specifically related to the farm operation or farm diversification scheme... In the case of new build, the buildings are of a scale, siting, design and materials appropriate to the site and surroundings.</i> No likely significant effects of this type of development on European sites is anticipated.	Category H (Screened out)
PE12: Tourist Accommodation, Facilities and Attractions	Although this policy could lead to development, any such development would be small-scale and within existing areas of settlement. No likely significant effects of this type of development on European sites is anticipated.	
PE14: Greenfield Valley	This policy relates to potential future development within Greenfield Valley <i>will be permitted where they do not detract from the tourism</i>	

	<i>potential of the Valley or harm areas or features of landscape, nature conservation or historic value. Any future development at Greenfield Valley would be within the boundaries of the existing site, no likely significant effects of this type of development on European sites is anticipated.</i>
<p>HN4: Housing in the Countryside</p> <p>HN4-A: Replacement Dwellings</p> <p>HN4-B: Residential Conversion of Rural Buildings</p> <p>HN4-C: Infill Development in Groups of Houses</p> <p>HN4-D: Affordable Housing Exceptions Schemes</p>	<p>These policies relate to development within the countryside. Although these policies could lead to development, given the small-scale nature of any such potential developments (as determined by the criteria set out within the individual policies), no likely significant effects on European sites is anticipated.</p>
<p>EN16: Development on or near Landfill Sites or Derelict and Contaminated Land</p>	<p>This policy ensures that development is not permitted within or adjacent to landfill sites, or derelict sites where the potential for contamination exists. In relation to designated sites, the policy states that permission will only be granted if <i>measures can be taken to identify and safeguard any significant nature conservation and historic interest which exist on the site</i>. No likely significant effects of this type of development on European sites is anticipated.</p>
<p>STR3: Strategic Sites</p> <p>STR10: Tourism, Culture and Leisure</p> <p>HN1: New Housing Development Proposals</p> <p>HN8: Gypsy and Traveller Sites</p> <p>PE1: General Employment Land Allocations</p> <p>PE2: Principle Employment Areas</p> <p>PE8: Development within Primary Shopping Areas</p> <p>PC11: Mostyn Docks</p> <p>PC12: Community Facilities</p> <p>EN13: Renewable and Low Carbon Energy Development</p> <p>EN25: Sustainable Minerals Development</p>	<p>Further screening required of these policies and associated allocations, refer to Tables 19 and 20.</p>

5 Detailed screening

- 5.1.1 The detailed screening of the LDP policies and allocation sites in relation to the European sites is presented in this section and is based on the findings of the initial screening exercise.
- 5.1.2 The detailed screening of the LDP policies and sites contains details of the potential impacts, the European sites potentially affected, and whether further Appropriate Assessment would be required. Each policy and site also include a categorisation of the potential effects in line with current guidance

(Tyldesley D. and Chapman, C (2013) The Habitats Regulations Assessment Handbook (accessed July 2019) edition UK DTA Publications Limited www.dtapublications.co.uk).

5.1.3 The allocations listed within the LDP are shown on the proposals map which accompanies the LDP.

5.2 Potential impacts

5.2.1 The following potential impacts have been identified through a review of the Conservation Objectives (and associated Supplementary Advice, where available), the management plans and policy guidance.

5.2.2 Note that none of the allocation sites within the LDP are located within a European site, and none of the policies would lead to development within a European site. Therefore, there would be no direct habitat or species loss of any European sites as a result of implementation of the LDP, and this potential impact pathway has been screened out of further assessment (alone and in combination).

Table 12: Potential impacts

Potential impact	European site
Air quality	Dee Estuary SAC/SPA/ Ramsar site Deeside and Buckley Newt SAC River Dee and Bala Lake SAC
Water quality	Dee Estuary SPA/ Ramsar site River Dee and Bala Lake SAC
Loss of habitat functionally linked to a European site	Dee Estuary SPA/ Ramsar site Deeside and Buckley Newt SAC
Disturbance/displacement	Dee Estuary SPA/ Ramsar site
Recreational disturbance	Dee Estuary SPA/ Ramsar site Deeside and Buckley Newt SAC

5.2.3 Each potential impact pathway is described in more detail below. The description includes an explanation as to why each of the potential impact pathways has been screened in or out of the further assessment. A review of available ecological information (as detailed below) has also been undertaken to inform the screening exercise to determine if a potential impact pathway could be present.

Ecological Information

5.2.4 The following data sources have been considered during the screening exercise to determine the presence of impact pathways to the European sites:

- Cofnod (North Wales Environmental Information Service) eMapper – to obtain details of protected species present in close proximity to the LDP allocations.
- British Trust for Ornithology (BTO) Bird Track Website – to obtain SPA/ Ramsar site species records in close proximity to the LDP allocations.
- Natural England pink-footed goose and swan functionally linked land Impact Risk Zone (IRZ) buffer – to identify areas of land outside of designated sites that have the potential to support habitats suitable for wintering geese and swans.
- OS mapping/MAGIC website – to identify the presence of water courses that could provide a link between an allocation and the designated sites.

Air quality

5.2.5 Changes in air quality from increased traffic and development could have impacts on European sites through an increase in nitrogen deposition which could occur as a result of the following:

- Construction activities in the vicinity of European sites.
- Increase in nitrogen deposition as a result of new employment sites.
- Increased population and road traffic may increase nitrogen deposition on sensitive habitats where these lie in close proximity to major commuting routes.

5.2.6 The Site Improvement Plan for the Dee Estuary and Mersey Narrows (Natural England, 2015) identified the risk of atmospheric nitrogen deposition as a potential pressure/threat to the European sites. The plan states that:

'There are a variety of sources of air pollution including from the industrial areas adjacent [to] the Estuary. Nitrogen deposition exceeds the site-relevant critical loads.'

5.2.7 The Site Improvement Plan includes the following qualifying features of the Dee Estuary which are sensitive to nitrogen deposition: estuaries, intertidal mudflats and sandflats, annual vegetation of drift lines, glasswort and other annuals colonising mud and sand, Atlantic salt meadows, shifting dunes, shifting dunes with marram, dune grassland, humid dune slacks and Petalwort. Production of a Site Nitrogen Action Plan is recommended although no details on how or when this would be actioned are provided.

5.2.8 Air quality has not been identified as a potential issue/ threat for the Deeside and Buckley Newt SAC (within the SAC Management Plan (NRW, 2008), or the River Dee and Bala Lake SAC (within the Prioritised Improvement Plan for the River Dee and Bala Lake (Natural England, 2014)). Potential air quality impacts associated with these European sites have therefore been screened out of further assessment (alone and in combination).

Construction phase

5.2.9 In relation to construction activities near to the Dee Estuary, current air quality guidance suggests that any construction sites or routes used by construction vehicles within 50 m of a designated site²; and the presence of any European site within 200 m of the main access roads used by HGVs accessing the site³ could lead to likely significant effects on the European site during the construction phases of new development.

5.2.10 Using aerial photography and Phase 1 habitat mapping from the Magic website⁴, it is possible to determine that, of the qualifying features within the Site Improvement Plan sensitive to nitrogen deposition, there are no annual vegetation of drift lines, glasswort and other annuals colonising mud and sand, shifting dunes, shifting dunes with marram, dune grassland, humid dune slacks and Petalwort within 200 m of any of the allocation sites, or potential haul routes. These features can therefore be ruled out of potential impacts associated with air pollution and the construction phase of development. The remaining features (comprising estuaries, intertidal mudflats and sandflats, and Atlantic salt meadows) could be present within 200 m and are discussed further below.

A small number of allocation sites within the LDP are within 200 m of the Dee Estuary SAC/ Ramsar site/ site/ SPA, as shown in

² Institute of Air Quality Management (IAQM), Guidance on the assessment of dust from demolition and construction (2014)

³ Design Manual for Roads and Bridges, Volume 11, Section 3, Part 1, HA 207/07 – Air Quality, Highways Agency, 2007.

⁴ MAGIC website. www.magic.gov.uk

5.2.11 Table 13.

Table 13: Allocation sites within 200 m of the Dee Estuary

Allocation	Construction site and haul route within 50 m of sensitive habitats/species?	Potential haul route used by HGVs within 200 m of sensitive habitat/species?
Northern Gateway (Ref: STR3A and PE2.11)	Yes. The southern edge of the allocation lies directly adjacent to an area of intertidal mudflat and sandflat within the River Dee.	No. The main access routes into the site would be at the northern end of the allocation from the existing A494 (more than 200 m from the River Dee).
Greenfield Business Park Phase II (Ref: PE1.3 and PE2.15)	Yes. The western edge of the allocation lies directly adjacent to an area of saltmarsh and intertidal mudflat and sandflat.	Yes. The main access route for construction traffic into the Business Park would pass within 200 m of an area of saltmarsh and intertidal mudflat and sandflat, however, this would only be a short stretch (approximately 200 m) with the remainder of the access route onto the A548 more than 200 m away.
Greenfield Business Park Phase III (Ref: PE1.4 and PE2.15)	Yes. The north-eastern tip of the allocation site lies within 50 m of an area of saltmarsh and intertidal mudflat and sandflat. However, the vast majority of the site is more than 50 m away.	Yes. A short section of the main access route for construction traffic into the allocation would pass within 200 m of an area of saltmarsh and intertidal mudflat and sandflat, however, this would only be a stretch of approximately 200 m, with the remainder of the access route onto the A548 more than 200 m away.
Adjacent Mostyn Docks (Policy PC11 and Ref: PE1.8 and PE2.20)	Yes. The allocation lies directly adjacent to an area of an area of saltmarsh and intertidal mudflat and sandflat. However, the vast majority of the site is more than 50 m away.	Yes. The main access route into the site would be at the western end of the allocation from the existing A548. This route passes within 200 m of the Dee Estuary, but takes traffic away from the sensitive habitats.
Castle Park Solar Farm (Ref: EN13.2)	No. The very northwest corner of the site lies within 50 m of the Estuary; however, the remainder of the site is more than 50m away.	Yes. The main access route into the site would be through Ashmount Industrial Estate. This route would pass within 200m of an area of saltmarsh and intertidal mudflat and sandflat. However, this would only be a short stretch with the remainder of the access route onto the A548 more than 200 m away.
Crumps Yard Solar Farm (Ref: EN13.1)	No. The allocation lies 80 m from the River Dee.	Yes. The main access route into the site would be along Dock Road. This route passes adjacent to the River Dee for a short section, then takes traffic away from any sensitive habitats.

Allocation	Construction site and haul route within 50 m of sensitive habitats/species?	Potential haul route used by HGVs within 200 m of sensitive habitat/species?
Ashmount Industrial Estate, Bagillt (Ref: PE2.13)	Yes. The allocation lies directly adjacent to an area of an area of saltmarsh and intertidal mudflat and sandflat. However, the vast majority of the site is more than 50 m away.	Yes. The main access route into the site would be through the existing Ashmount Industrial Estate. This route would pass within 200m of an area of saltmarsh and intertidal mudflat and sandflat. However, this would only be a short stretch with the remainder of the access route onto the B5129 more than 200 m away.
Dock Road, Connah's Quay (Ref: PE2.10)	Yes. The north-eastern tip and the western edge of the allocation site lies within 50 m of an area of saltmarsh and intertidal mudflat and sandflat. However, the vast majority of the site is more than 50 m away.	Yes. The main access route into the site would be along Dock Road. This route passes adjacent to the River Dee for a short section, then takes traffic away from any sensitive habitats.
Queensferry Industrial Estate, Pentre (Ref: PE2.22)	Yes. The allocation lies directly adjacent to an area of an area of saltmarsh and intertidal mudflat and sandflat. However, the vast majority of the site is more than 50 m away	No. The main access routes into the site would be at the northern end of the allocation from the existing B5129 (more than 200 m from the River Dee).
Engineer Park and St Ives Park, Sandycroft (Ref: PE2.27)	Yes. The allocation lies directly adjacent to an area of an area of saltmarsh and intertidal mudflat and sandflat. However, the vast majority of the site is more than 50 m away	No. The main access routes into the site would be at the northern end of the allocation from the existing B5129 (more than 200 m from the River Dee).
Sandycroft Industrial Estate, Sandycroft (Ref: PE2.29)	Yes. The allocation lies directly adjacent to an area of an area of saltmarsh and intertidal mudflat and sandflat. However, the vast majority of the site is more than 50 m away	No. The main access routes into the site would be at the northern end of the allocation from the existing B5129 (more than 200 m from the River Dee).
The Borders Industrial Park, Chesterbank Industrial Park and Brymau Four Estate, Saltney (Ref: PE2.26)	Yes. The allocation lies directly adjacent to an area of an area of saltmarsh and intertidal mudflat and sandflat. However, the vast majority of the site is more than 50 m away	Yes. The main access route into the site would be along the existing B5129. This route passes adjacent to the River Dee for a short section, then takes traffic away from any sensitive habitats.
Brymau One, Two and Three Estates and Glen Industrial Estate, Saltney (Ref: PE2.25)	Yes. The allocation lies directly adjacent to an area of an area of saltmarsh and intertidal mudflat and sandflat. However, the vast majority of the site is more than 50 m away	Yes. The main access route into the site would be along the existing B5129. This route passes adjacent to the River Dee for a short section, then takes traffic away from any sensitive habitats.

Based on the information provided in

- 5.2.12 Table 13, sensitive habitats are present within 200 m of potential construction sites or potential haul routes for all of the allocation sites near to the Dee Estuary. However, the Appropriate Assessment of the Masterplan for the Northern Gateway (Ref: STR3A and PE2.11) allocation did not identify likely significant effects associated air pollution (Middlemarch Environmental, 2010 (Appendix D2)). Policy PC11 in relation to the Mostyn Docks allocation within the LDP states that '*Development proposals which enhance the transport and employment role of the docks will be permitted provided that such proposals do not have a significant adverse effect on the ecological, landscape, historic, recreational integrity and water and air quality of the Dee Estuary*'. For the remaining eleven sites in Table 13, these are all small (less than 20 ha in total), development/redevelopment allocations within existing industrial areas. Whilst there is the potential for an increase air pollution as a result of an increase in HGVs during any construction activities at the allocations, given the small-scale of any such redevelopment, and the expected short-term duration of construction activities at these allocation sites, it is not anticipated that any future development/redevelopment at these sites would be sufficient to cause a likely significant effect on the adjacent sensitive habitats/species either alone or in combination.
- 5.2.13 Although allocation Castle Park Industrial Estate (Ref: HN8.4) lies adjacent to the Dee Estuary SPA/Ramsar site/ SAC, given that there would be no construction works associated with allocating the site as a gypsy and traveller site, no likely significant effects on the air quality on the adjacent SPA/ Ramsar site/SAC are anticipated (and this allocation has not been included in Table 13 above).
- 5.2.14 In addition, to protect air quality, all new developments would be required produce a Construction Environmental Management Plan, which ensures any environmental impacts are avoided or minimised during construction. This would be in addition to according with relevant legislation ensuring any emissions meet appropriate guidelines. Given that no developments would be consented if they do not meet the stringent air quality guidance, this potential impact pathway has been **screened out** of further assessment.

Operational phase

Employment sites

- 5.2.15 In relation to operational phase impacts associated with new development within Flintshire, the Council can confirm that all employment site allocations within the LDP are allocated for B Use Classes. This includes Use Class B1, B2 and B8 only. B use classes are defined as follows: B1-business (comprising offices, premises for Research and Development and light Industrial processes which can take place within a residential area without damaging the amenity of that area); B2 - general Industry (for the use of carrying out an industrial process other than one falling within class B1); and B8 - storage and distribution (applies to properties and land which are used for storage or as a distribution centre).
- 5.2.16 Although it is not possible, at this strategic level, to confirm exactly which businesses would be developed on the employment allocations within the LDP, given that the B1, B2 and B8 use classes do not include the types of businesses which are likely to cause significant increases in air pollution, any increase in industrial air pollution as a result of new B Class employment sites within Flintshire would be negligible, and not significant.
- 5.2.17 In addition, any new developments would be required to accord with relevant legislation ensuring any emissions meet appropriate guidelines and comply with all relevant policies within the LDP before they can be consented. Therefore, any potential impacts associated with air pollution from new employment allocations are considered unlikely. This potential impact pathway has been **screened out** of further assessment.

Housing Developments

- 5.2.18 The construction of approximately 7,950 new homes within Flintshire has the potential to increase traffic (and as a consequence air pollution) within the new housing estates themselves, as well as along existing roads used by new homeowners (such as commuter routes) in the vicinity of sensitive habitats/species. IAQM/ EPUK and DMRB guidance consider designated sites that falls within 200 m of a new road/development when undertaking air quality assessments.

5.2.19 In terms of new housing developments themselves, only one housing allocation within the LDP is located within 200m of any sensitive habitats/species associated with European sites. The southern edge of the allocation lies directly adjacent to an area of intertidal mudflat and sandflat within the Dee Estuary SAC. However, the Appropriate Assessment for the Northern Gateway Masterplan (Middlemarch Environmental, 2010 (Appendix D2)), did not identify any potentially significant air quality effects. Significant effects on the sensitive habitats and species within the Dee Estuary (or any other European sites), as a result of increases in traffic associated with the new housing developments allocated within the LDP, are therefore considered unlikely. This potential impact pathway has been **screened out** of further assessment.

Conclusion

5.2.20 No air quality impacts have been identified as a result of implementing the LDP alone. Any potential residual air quality effects are considered to be de minimis (i.e. the risk of the LDP contributing to a likely significant effect, in combination with other plans/ projects, is hypothetical rather than conceivable). Consequently, no in combination effects in terms of air pollution are anticipated (as per the Wealden District Council v. Secretary of State for Communities and Local Government, Lewes District Council and South Downs National Park Authority [2017] EWHC 351). Potential air quality effects have been **screened out** of further assessment alone and in combination.

Water quality

5.2.21 Changes in water quality as a result of new development could have impacts on European sites as a result of the following:

- Increased risk of potential pollution incidents from construction activities in the vicinity of European sites.
- Potential increases in suspended sediments resulting in ecological effects, such as the direct loss of habitats caused by re-deposition of suspended sediment, and the consequential health or mortality effects on prey species, particularly invertebrates associated with the intertidal mudflats.

5.2.22 The Site Improvement Plan for the Dee Estuary and Mersey Narrows (Natural England, 2015) identified water pollution as a potential pressure/threat to the European sites. The plan states that:

'The Dee Estuary may be nutrient enriched (there are currently failures for dissolved inorganic nitrogen and macro algae) and is affected by both diffuse and point sources. The Lower River Dee may also be nutrient enriched, with high phosphate levels and possibly elevated nitrate levels (associated with agricultural sources). There are a number of outfalls (stormwater and industrial overflows) within the vicinity of this site which could have an impact on the site. Industrial sites (including historic sites) surrounding the Estuary pose a risk of diffuse and point source pollution. There is also a risk from unregulated activity which is not fully understood. Moreover, historic waste sites including former collieries, landfills etc are releasing leachate and waste and require action to prevent further pollution. Some of the extent/severity of impacts require further quantification.'

5.2.23 A small number of allocation sites within the LDP are potentially hydrologically linked to the River Dee and Bala Lake SAC or the Dee Estuary Ramsar/SPA/SAC, as shown in Table 14. There are no allocation sites hydrologically linked to the Deeside and Buckley Newt Sites SAC.

Table 14: Allocation sites near to a European site with potential hydrological link

Allocation	Allocation site hydrologically linked
Northern Gateway (Ref: STR3A and PE2.11)	Although there are no watercourses within the allocation which could link into a European site, the allocation site is located directly adjacent the River Dee, and therefore there is the potential for construction site run off.
Ashmount Industrial Estate, Bagillt (Ref: PE2.13)	
Dock Road, Connah's Quay	

Allocation	Allocation site hydrologically linked
(Ref: PE2.10)	
Queensferry Industrial Estate, Pentre (Ref: PE2.22)	
Engineer Park and St Ives Park, Sandycroft (Ref: PE2.27)	
Sandycroft Industrial Estate, Sandycroft (Ref: PE2.29)	
The Borders Industrial Park, Chesterbank Industrial Park and Brymau Four Estate, Saltney (Ref: PE2.26)	
Brymau One, Two and Three Estates and Glen Industrial Estate, Saltney (Ref: PE2.25)	
Greenfield Business Park Phase II (Ref: PE1.4 and PE2.15)	
Greenfield Business Park Phase III (Ref: PE1.5 and PE2.15)	Although there are no watercourses within these allocations which could link into a European site, the allocations lie adjacent to areas of saltmarsh and intertidal mudflat and sandflat within the Dee Estuary, and therefore there is the potential for construction site run off.
Adjacent Mostyn Docks (Policy PC11 and Ref: PE1.8 and PE2.20)	
River Lane, Saltney (Ref: PE1.11)	Although there are no watercourses within this allocation which could link into a European site, the allocation lies adjacent to River Dee and Bala Lake SAC, and therefore there is the potential for construction site run off.
Castle Park Solar Farm (Ref: EN13.2)	Although there are no watercourses within this allocation which could link into a European site, the allocation lies adjacent to the Dee Estuary and drainage ditches (within Flint Marsh) flow into the Estuary, and therefore there is the potential for construction site run off.

5.2.24 Five other allocations lie in the vicinity of the Dees Estuary, or could be hydrologically linked, however, potentially significant effects are considered unlikely, as detailed below.

5.2.25 Although Crump's Yard Solar Farm (Ref: EN13.1) is located within 80 m of the Dee Estuary, there are no apparent direct, or indirect hydrological links to the nearby designated sites, and therefore likely significant water quality effects have been ruled out. Land between Denbigh Road and Gwernaffield Rd, Mold (Ref: HN1.6) lies adjacent to the River Alyn which discharges into the River Dee and Greenfield Cemetery (Ref: PC12.2) is adjacent to a small unnamed watercourse which flows into the Dee Estuary. However, due to the distances involved for both allocation sites, any pollutants entering the watercourses as a result of development, would need to travel a significant distance before discharging into a designated watercourse, and therefore would be diluted such that there would be no likely significant effect. Castle Park Industrial Estate (Ref: HN8.4) lies adjacent to the Dee Estuary

and Riverside, Queensferry (Extension) (Ref: HN8.3) is within 100 m of the Dee Estuary. Given that there would be no construction works associated with allocating these two sites as a gypsy and traveller sites, no likely significant effects on the water quality of the adjacent SPA/ Ramsar site/SAC are anticipated. Potential water quality effects associated with these three sites has been **screened out** of further assessment.

Conclusion

- 5.2.26 There are a small number of allocations with the potential for impacts on water quality as a result of future development at these sites. This potential impact has therefore been **screened in** for further assessment for those thirteen allocations set out within Table 14.

Loss of habitat functionally linked to a European site (i.e. used by overwintering/ passage birds or great crested newts)

- 5.2.27 Functionally linked land is considered to be any land outside of a European site, which is regularly used by species that are a qualifying interest features of that European site. When assessing use of land by SPA/ Ramsar site bird species, such areas would be considered functionally linked only where significant numbers of qualifying species are regularly present.
- 5.2.28 In relation to this HRA Report, this includes land (comprising farmland, or other wetland habitat and brown field sites) that is regularly used by qualifying bird species associated with the Dee Estuary SPA/ Ramsar site during the winter and on passage for foraging or roosting, such as godwits, oystercatcher and curlew. The Site Improvement Plan for the Dee Estuary and Mersey Narrows does not include loss of functionally linked land as a potential threat to the European sites. However, there are a number of allocation sites located within, or adjacent to land which could potentially constitute functionally linked land for SPA/ Ramsar site bird species.
- 5.2.29 Functionally linked land also applies to terrestrial habitat suitable for great crested newts associated with the Deeside and Buckley Newt Sites SAC. Flintshire County Council have produced a Great Crested Newt Mitigation Requirements Supplementary Planning Guidance note (Flintshire County Council, 2018) to provide advice and guidance to developers, landowners, members and other council officers when making decisions on planning issues involving, or in close proximity to great crested newt populations. A small number of the allocation sites are located within, or adjacent to the Deeside and Buckley Newt Sites SAC.

SPA/ Ramsar site qualifying bird species

- 5.2.30 Loss of functionally linked land would only be related to those qualifying species which are known to regularly use habitats outside of the European sites for foraging or roosting. Guidance produced by Natural England (provided in Appendix C) indicates the distance from the designated sites over which different species would generally disperse to forage/ roost. For the qualifying wintering waders and wildfowl associated with the Dee Estuary SPA/ Ramsar site (which could utilise functionally linked land including species such as curlew, oystercatcher and shelduck) the maximum distance these species would generally travel away from the European sites would be 2 km. Species that travel further are not listed as individual qualifying species on the site citations, and the extent of the Natural England goose and swan functional land IRZ is also located over 2.5 km from any of the LDP allocations.
- 5.2.31 Although there are 19 allocations within 2.5 km of the Dee Estuary, none are considered to be located on functionally linked land, as detailed in Table 15. Loss of functionally linked land in relation to SPA/ Ramsar site birds is therefore **screened out** of further assessment alone and in combination.

Table 15: Allocations within 2.5 km of the Dee Estuary SPA/ Ramsar site

Allocation	Description
Northern Gateway (Ref: STR3A and PE2.11)	The Northern Gateway allocation does support large fields which could be used by SPA/ Ramsar site species; however, the Environmental Statement of the Masterplan (Middlemarch Environmental, 2010) confirms that this area does not constitute functionally linked land (<i>‘the application site possesses no</i>

Allocation	Description
	<i>important high tide wetland bird roosts. In addition, no significant wetland bird roosts were identified adjacent to, or abutting the application site'.)</i>
Chester Road East, Queensferry (Ref: PE1.9)	Although this green field site is located within 2 km of the Estuary, it comprises scrub and rough grassland in an urban location. The site is surrounded on all sides by existing development and roads, and a railway, and no bird records of wintering waterfowl were identified within or close to the allocation. The site is not considered to constitute functionally linked land.
Rowley's Drive, Shotton (Ref: PE1.12 and PE2.30)	Very small allocation comprising scrub and trees. The site is surrounded on all sides by existing development and is unsuitable for SPA/ Ramsar site species. The site would not constitute functionally linked land.
Highmere Drive, Connah's Quay (Ref: HN1.3)	Two green field allocations on the edge of Connah's Quay. The sites are adjacent to development, and no bird records of wintering waterfowl were identified within or close to the allocations. These sites would not be considered to constitute functionally linked land.
Broad Oak Holding, Mold Road, Connah's Quay (Ref: HN1.2)	
Northop Road, Flint (Ref: HN1.4)	Although this green field site is located within 1.5 km of the Estuary, it is enclosed by existing development and roads to the north, east and west, and woodland and a golf course to the south. No bird records of wintering waterfowl were identified within or close to the allocation. The site is not considered to constitute functionally linked land.
Greenfield Business Park Phase II (Ref: PE1.4 and PE2.15)	Although this allocation lies adjacent to the Dee Estuary, the site comprises rough grassland, hard standing and scrub. The site appears to be well used by vehicles and is not considered to constitute functionally linked land.
Greenfield Business Park Phase III (Ref: PE1.5 and PE2.15)	Although the two compartments which make up this allocation lie adjacent to the Dee Estuary, the sites comprise predominantly scrub with small sections of grassland and hard standing. The site is unsuitable for SPA/ Ramsar site species and is not considered to constitute functionally linked land.
Adjacent Mostyn Docks (Ref: PE1.8 and PE2.20)	Although this allocation site lies adjacent to the Dee Estuary, the site comprises predominantly scrub with small sections of grassland and hard standing. The site is unsuitable for SPA/ Ramsar site species and is not considered to constitute functionally linked land.
Greenfield Cemetery (Ref: PC12.2)	The allocation comprises areas of scrub/woodland to the west and a small grassland field (split into two on the eastern side of the site). The allocation is surrounded by existing development and woodland and is not considered to constitute functionally linked land.
Castle Park Solar Farm (Ref: EN13.2)	Although this allocation lies adjacent to the Dee Estuary, the site comprises rough grassland and scrub. The site appears to be well used, with paths crossing the allocation on the northern side. The site is not considered to constitute functionally linked land.
Crumps Yard Solar Farm (Ref: EN13.1)	The allocation comprises predominantly scrub with small sections of grassland and hard standing. The site is surrounded by existing development/railway line and appears to be well used by local residents with numerous paths leading from existing development to the north. The site is not considered to constitute functionally linked land.

Allocation	Description
Magazine Lane, Ewloe (Extension) (Ref: HN8.1)	The site comprises a single small field surrounded by trees and is not considered to constitute functionally linked land.
Riverside, Queensferry (Extension) (Ref: HN8.3)	Although less than 100 m from the Dee Estuary, the site comprises hardstanding and scrub and is not considered to constitute functionally linked land.
Castle Park Industrial Estate (Ref: HN8.4)	Although the sites are adjacent to the Dee Estuary, the sites comprise small areas of hardstanding and are not considered to constitute functionally linked land.
Ashmount Industrial Estate, Bagillt (Ref: PE2.13)	
Dock Road, Connah's Quay (Ref: PE2.10)	
Manor Industrial Estate, Bagillt (Ref: PE2.3)	
Castle Park/ Ashmount Industrial Centre, Flint (Ref: PE2.14)	

Great crested newts

5.2.32 Flintshire's Great Crested Newt Mitigation Requirements Supplementary Planning Guidance (SPG) (Flintshire, 2018) indicates that functionally linked land could occur up to 500 m from the SAC boundary (refer to Appendix I of the SPG). The Conservation Objectives for the Deeside and Buckley Newt Sites SAC also includes the following:

"Off site habitats that function as stepping stones or corridors located between SAC compartments will be maintained for migration, dispersal, foraging and genetic exchange purposes"

5.2.33 None of the allocation sites are located within the SAC, and therefore no habitat within the SAC will be directly affected. In addition, none of the allocations lie between compartments that make up the SAC and therefore any such links would not be affected by the allocations within the LDP. The only potential impact could be through allocations which lie within the 500m buffer set out within the Great Crested Newt Mitigation Requirements Supplementary Planning Guidance. However, although there are nine allocations within 500m of the SAC boundary, none are considered to be functionally linked to the SAC populations of great crested newts (as detailed in Table 16), and this potential impact has therefore been **screened out** of further assessment alone and in combination.

Table 16: Allocations adjacent to SAC compartments

Allocation	Proximity to SAC
Drury New Road, Buckley (Ref: PE1.3)	<p>The site is directly adjacent to the SAC on its northern and western boundaries. The main aggregation of ponds within the SAC compartment are approximately 400 m away. There does not appear to be any ponds within the allocation site itself.</p> <p>There are no NBN, or COFNOD records for the site, with the nearest records being 50 m to the north within the SAC.</p>

Allocation	Proximity to SAC
	<p>The site itself is not considered optimal newt habitat and is not considered to be functionally linked to the SAC.</p>
<p>Broad Oak Holding, Mold Road, Connah's Quay, Flintshire (Ref: HN1.2)</p>	<p>The site is approximately 15 m from the SAC at its closest point. The SAC is separated by a road, and the ponds within the compartment are more than 200 m from the allocation (separated by housing and a main road).</p> <p>There are no NBN, or COFNOD records for the site, but there is a pond to the north and NBN record to the north of the allocation.</p> <p>The site itself is not considered optimal newt habitat and is not considered to be functionally linked to the SAC.</p>
<p>Magazine Lane, Ewloe (Extension) (Ref: HN8.1)</p>	<p>The site is approximately 410 m from the SAC at its closest point. The SAC is separated by the A55, and the ponds within the compartment are more than 500 m from the allocation (separated by the A55, woodland and the quarry).</p> <p>There are no NBN, or COFNOD records for the site.</p> <p>The site itself is not considered optimal newt habitat and is not considered to be functionally linked to the SAC.</p>
<p>Extension to Pant y Pwll Dwr Quarry (Limestone) (Ref: EN25.2)</p>	<p>The site is adjacent to the SAC but separated from the quarry by existing roads.</p> <p>There are no NBN or COFNOD records for the site, but there are NBN records to the north (approximately 300m) and east (approximately 500m).</p> <p>The site itself is not considered optimal newt habitat (due to the existing quarry works) and is not considered to be functionally linked to the SAC.</p>
<p>Ewloe Barns (Industrial Estate), Alltami (Ref: PE2.1)</p>	<p>The site is directly adjacent to the SAC on its southern boundary. The nearest pond within the SAC compartment is approximately 400 m away. There do not appear to be any ponds within the allocation site itself.</p> <p>There are no NBN, or COFNOD records for the site.</p> <p>The site itself is not considered optimal newt habitat and is not considered to be functionally linked to the SAC.</p>
<p>Alltami Depot, Alltami (Ref:PE2.2)</p>	<p>The site is adjacent to the SAC but separated by existing roads.</p> <p>There are no NBN or COFNOD records for the site.</p> <p>The site itself is not considered optimal newt habitat and is not considered to be functionally linked to the SAC.</p>
<p>Catheralls Industrial Estate and Pinfold Industrial Estate, Buckley (Ref: PE2.5)</p>	<p>The site is directly adjacent to the SAC on its northern boundary. The nearest pond within the SAC compartment is approximately 160m away. There do not appear to be any ponds within the allocation site itself.</p> <p>There are no NBN, or COFNOD records for the site.</p> <p>The site itself is not considered optimal newt habitat and is not considered to be functionally linked to the SAC.</p>
<p>Little Mountain Industrial Estate, Buckley (Ref: PE2.7)</p>	<p>The site is directly adjacent to the SAC on its northern boundary. The nearest pond within the SAC compartment is approximately 400m away. There do not appear to be any ponds within the allocation site itself.</p> <p>There are no NBN, or COFNOD records for the site.</p>

Allocation	Proximity to SAC
	The site itself is not considered optimal newt habitat and is not considered to be functionally linked to the SAC.
Spencer Industrial Estate, Buckley (Ref: PE2.8)	<p>The site is directly adjacent to the SAC on its northern and western boundaries. The nearest pond within the SAC compartment is approximately 300m away. There do not appear to be any ponds within the allocation site itself.</p> <p>There are no NBN, or COFNOD records for the site.</p> <p>The site itself is not considered optimal newt habitat and is not considered to be functionally linked to the SAC.</p>

Conclusion

5.2.34 There would be no loss of functionally linked land associated with the Dee Estuary SPA/ Ramsar site or the Deeside and Buckley Newt Sites SAC as a result of implementing the LDP, and therefore this impact has been **screened out** of further assessment alone and in combination.

Disturbance/ displacement to species as a result of construction activities/ operational stage

5.2.35 There is the potential to disturb qualifying species within European sites, in particular birds, during the construction and operational phases of new developments. Disturbance/displacement could occur as a result of noise, visual, vibration and lighting disturbance during both the construction and operational phase of new developments. This could be associated with development near to the Dee Estuary itself, or disturbance/ displacement of bird using functionally linked land adjacent to new development sites.

5.2.36 There are nine allocations (comprising: Greenfield Business Park Phase II (Ref: PE1.4 and PE2.15), Greenfield Business Park Phase III (Ref: PE1.5 and PE2.15), Adjacent Mostyn Docks (Policy PC11 and Ref: PE1.8 and PE2.20), Castle Park Solar Farm (Ref: EN13.2), Castle Park Industrial Estate (Ref: HN8.4), Ashmount Industrial Estate, Bagilly (Ref: PE2.13), Dock Road Connah's Quay (Ref: PE2.10), Manor Industrial Estate, Bagillt (Ref: PE2.3) and Castle Park/ Ashmount Industrial Centre, Flint (Ref: PE2.14) directly adjacent to the Dees Estuary SPA/ Ramsar site with the potential to disturb birds within the estuary itself. Further assessment will be required of these allocations and they are **screened in** for further assessment.

5.2.37 For the remaining nine allocations within 2.5 km of the Dee Estuary (i.e. within the likely foraging range of Dee Estuary SPA/ Ramsar site species as set out within paragraph 5.2.30), none were considered to be adjacent to land which could constitute functionally linked land (as set out within Table 17) and can therefore be **screened out** of further assessment alone and in combination.

Table 17: Allocations within 2.5 km of the Dee Estuary SPA/ Ramsar site

Allocation	Description
Northern Gateway (Ref: STR3A and PE2.11)	The allocation is surrounded by development and roads, there is no functionally linked land adjacent to the allocation.
Chester Road East, Queensferry (Ref: PE1.9)	This allocation is surrounded on all sides by existing development and roads, and a railway. There is no functionally linked land adjacent to the allocation.
Rowley's Drive, Shotton (Ref: PE1.12 and PE2.30)	This allocation is surrounded on all sides by existing development and roads, and a railway. There is no functionally linked land adjacent to the allocation.
Highbere Drive, Connah's Quay (Ref: HN1.3)	This allocation is surrounded by existing development to the north and east. Although there are fields to the south and west, these are small and surrounded by woodland

Allocation	Description
	and scrub and farm buildings. These fields would not be considered to be functionally linked land adjacent to the allocation.
Broad Oak Holding, Mold Road, Connah's Quay (Ref: HN1.2)	This allocation is surrounded by existing development to the north and south. Although there are fields to the west, these are small and surrounded by woodland and scrub. These fields would not be considered to be functionally linked land adjacent to the allocation.
Northop Road, Flint (Ref: HN1.4)	This allocation is enclosed by existing development and roads to the north, east and west. Although there are a number of smaller fields to the south, these are surrounded by woodland, roads and a golf course. The site is not considered to be adjacent to functionally linked land.
Crumps Yard Solar Farm (Ref:EN13.1)	This allocation is surrounded by existing development to the north, west, and south. Although there is some rough grassland to the east, this is surrounded by scrub and trees, and is adjacent to existing development. The site is not considered to be adjacent to functionally linked land.
Riverside, Queensferry (Extension) (Ref: HN8.3)	This allocation is surrounded by existing development. The site is not considered to be adjacent to functionally linked land.
Greenfield Cemetery (Ref: PC12.2)	The allocation is surrounded by existing development and woodland. The fields to the south comprise grassland, however, they are small and surrounded by hedgerows and trees reducing potential sightlines. The land surrounding the allocation is not considered to constitute functionally linked land.

Conclusion

5.2.38 There are nine allocations located directly adjacent to the Dee Estuary with the potential for disturbance/ displacement impacts on the Dee Estuary SPA/ Ramsar site itself, as a result of future development at these sites. This potential impact has therefore been **screened in** for further assessment for those nine allocations. None of the allocations within 2.5 km of the Dee Estuary SPA/ Ramsar site were considered to be located near to habitats which could be considered functionally linked land to the European site, and therefore this potential impact has been **screened out** of further assessment alone and in combination.

Disturbance to habitats and species through increased recreational activity, during operational stage

5.2.39 There is the potential to disturb and/or displace qualifying species associated with European sites, in particular birds, during the construction and operational phases of new developments in proximity to the site's boundary. Recreational disturbance/displacement could occur as a result of the following:

- Increase in use of footpaths across land which is considered to be functionally linked land as a result of new housing developments.
- Increase in recreational disturbance to birds as a result of an increase in visitors to the coast.
- Increase in disturbance on great crested newts as a result of increased visitors to parks and nature reserves forming part of the Deeside and Buckley Newt SAC
- Increase in recreational pressure on the Dee Estuary SAC leading to degradation of habitats within the SAC.

SPA/ Ramsar site qualifying bird species

5.2.40 The Site Improvement Plan for the Dee Estuary identified public access/disturbance as a potential pressure/threat to the site. The plan states that:

'Direct disturbance to birds as a result of public access and recreation activities (including dog walking, kite surfing, sand yachting, parascending, hovercrafts etc) is a concern.'

- 5.2.41 The Regulation 33 advice for the Dee Estuary identifies areas where recreational activities are prevalent and in close proximity to roosting and breeding sites used by qualifying bird species. The locations identified in the Regulation 33 advice as those subject to moderate levels of recreational activity are all to the north of Flint.
- 5.2.42 An increase in population (as a result of new development) could result in increased recreational pressure as a result of additional people in an area and the consequent increases in people visiting the Dee Estuary. In order to assess the potential impact, the distance people regularly travel to visit coastal areas has been reviewed. A Recreational Disturbance Study carried out by Footprint Ecology for the Morecambe Bay Partnership identified that visitors to the Morecambe Bay coast who were on a day-trip/short visit from home travelled a median distance of 3.454 km to get to the European site. The Dee Estuary is within close proximity for residents of Flintshire and therefore, increased disturbance to birds (as a result of recreational pressure) at this European site could occur, particularly for those allocations within 3.5 km of the European site. New housing allocation sites (excluding new gypsy and travellers sites allocated under policy HN8) and mixed-use allocations (which include an element of residential dwellings within the proposals) within 3.5 km of a European site and employment sites within 1.5 km of the Dee Estuary will therefore be **screened in** for further assessment.
- 5.2.43 There is also the potential for increased recreational use of land outside of the European site, but which is functionally linked to the European site, as a result of new housing developments within Flintshire. The presence of functionally linked land adjacent to allocations within 2.5 km of the Dee Estuary SPA/ Ramsar site has been **screened out** of the assessment (refer to Paragraphs 5.2.33 and 5.2.36) and therefore potential recreational pressure on such land can also be **screened out** of further assessment alone and in combination.

Great crested newts

- 5.2.44 The management plan for the Dee and Buckley Newt SAC acknowledges the regular recreational use of a number of the compartments that form the SAC. There are three allocations in close proximity of the SAC (comprising Broad Oak Holding, Mold Rd (Ref: HN1.2), Holywell Road/ Green Lane, Ewloe (Ref: HN1.7) and Drury New Road (Ref: PE1.4) which could be accessed by new residents/ employees. This potential impact has therefore been **screened in** for further assessment in relation to these three allocation sites.

Conclusion

- 5.2.45 There are a number of allocations with the potential for recreational impacts on the Dee Estuary SPA/ Ramsar site, and the Dee and Buckley Newt SAC. This potential impact has therefore been **screened in** for further assessment.

5.3 Detailed Screening of the LDP Policies

- 5.3.1 The screened in LDP policies/allocation sites were examined in detail to determine the need for further Appropriate Assessment.
- 5.3.2 Table 18 provides the screening of the policies. The detailed assessment of each of the allocation sites associated with these policies is provided in Table 19. Based on the initial screening exercise, the following potential impacts have been screened in/ out of the detailed screening.
- 5.3.3 The following potential impacts have been screened in/ out of the detailed screening.

Table 18: Potential Impacts Screened in/out of the Assessment

Potential impact	European site	Screened in/ out of assessment alone?	Screened in/ out of assessment in combination
Air quality	Dee Estuary SPA/ Ramsar site	Screened out	Screened out
Water quality	Dee Estuary SPA/ Ramsar site River Dee and Bala Lake SAC	Screened in	Screened in
Loss of habitat functionally linked to a European site	Dee Estuary SPA/ Ramsar site Deeside and Buckley Newt SAC	Screened out	Screened out
Disturbance/displacement	Dee Estuary SPA/ Ramsar site Deeside and Buckley Newt SAC	Screened in	Screened in
Recreational disturbance	Dee Estuary SPA/ Ramsar site Deeside and Buckley Newt SAC	Screened in	Screened in

Table 19: Detailed Screening of the Screened In Policies within the LDP

Policy	European site Potentially Affected	Potential Effects	Detailed Assessment	Conclusion
STR3: Strategic Sites	Dee Estuary SPA/ Ramsar site Deeside and Buckley Newt SAC	This policy details the two key strategic sites (Northern Gateway and Warren Hill) which will make an important contribution to the overall provision for growth in Flintshire over the Plan period New development at these strategic sites has the potential to impact European sites through changes to water quality, disturbance/ displacement of SPA/ Ramsar site species and recreational pressure.	Detailed screening of the two strategic sites associated with this policy is provided in Table 20. Extensive project-level assessment has been undertaken at both of these strategic sites. The detailed screening confirmed no LSE on the European sites considered in this assessment, and no further assessment of these allocations alone or in combination is required.	No LSE alone or in combination
STR10: Tourism, Culture and Leisure	Dee Estuary SPA/ Ramsar site Deeside and Buckley Newt SAC	This policy details how Flintshire can capitalise on its attractiveness as a tourist destination. There are no allocation sites associated with this policy, however, the policy has the potential to lead to development of new recreational areas which could increase recreational pressure on European sites.	The policy includes wording which would aim to protect European sites. The policy states that: <i>All proposed development must be appropriate to its location and surrounding environment and not have negative landscape or environmental impact with particular regard to the Clwydian Range Area of Outstanding Natural Beauty (AONB) and European Designated Sites'</i> This along with compliance with Policy STR13 (which protects the natural environment), would ensure no LSE associated with future tourism and leisure developments within Flintshire.	No LSE alone or in combination
HN1: New Housing Development Proposals	Dee Estuary SPA/ Ramsar site/ SAC Deeside and Buckley Newt SAC River Dee and Bala Lake SAC	This policy sets out the locations to help deliver the identified housing requirement over the Plan period. New residential development has the potential to impact European sites through changes to water quality, disturbance/ displacement of SPA/ Ramsar site species and recreational pressure.	Detailed screening of the new housing allocations associated with this policy is provided in Table 20. The detailed screening confirmed no LSE on the European sites considered in this assessment and no further assessment of these allocations alone is required. Further in combination assessment was required for the six housing allocations within 3.5 km of the Dee Estuary. The assessment (refer to Sections 6 and 7) concluded no likely significant in combination effects.	No LSE alone or in combination
HN8: Gypsy and Travellers Sites	Dee Estuary SPA/ Ramsar site/ SAC Deeside and Buckley Newt SAC River Dee and Bala Lake SAC	This policy sets out the locations for four gypsy and travellers sites. These allocations have the potential to impact European sites through changes to water quality, disturbance/ displacement of SPA/ Ramsar site species and recreational pressure.	Detailed screening of the gypsy and travellers site allocations associated with this policy is provided in Table 20. The detailed screening confirmed no LSE on the European sites considered in this assessment and no further assessment of these allocations alone is required. The detailed screening confirmed no LSE on the European sites considered in this assessment and no further assessment of these allocations alone or in combination is required.	No LSE alone or in combination
PE1: General Employment Land Allocations	Dee Estuary SPA/ Ramsar site Deeside and Buckley Newt SAC River Dee and Bala Lake SAC	This policy sets out the general employment land which has been allocated for B1, B2 and B8 employment uses over the Plan period. New employment development has the potential to impact European sites through changes to water quality, disturbance/ displacement of SPA/ Ramsar site species and recreational pressure.	Detailed screening of the new employment allocations associated with this policy is provided in Table 20. The detailed screening confirmed no LSE on the European sites considered in this assessment and no further assessment of these allocations alone or in combination is required.	No LSE alone or in combination
PE2: Principal Employment Areas	Dee Estuary SPA/ Ramsar site Deeside and Buckley Newt SAC River Dee and Bala Lake SAC	This policy sets out the areas where most employment development is likely to take place. New employment development has the potential to impact European sites through changes to water quality, disturbance/ displacement of SPA/ Ramsar site species and recreational pressure.	Detailed screening of the principal employment areas associated with this policy is provided in Table 20. The detailed screening confirmed no LSE on the European sites considered in this assessment and no further assessment of these allocations alone or in combination is required.	No LSE alone or in combination

Policy	European site Potentially Affected	Potential Effects	Detailed Assessment	Conclusion
PC11: Mostyn Docks	Dee Estuary SPA/ Ramsar site/ SAC	This policy outlines the potential for development at Mostyn Docks. Redevelopment at this site has the potential to impact European sites through changes to water quality, disturbance/ displacement of SPA/ Ramsar site species and recreational pressure.	Detailed screening of the Mostyn Docks allocation is provided in Table 20. The detailed screening confirmed no LSE on the European sites considered in this assessment and no further assessment of this allocation alone or in combination is required.	No LSE alone or in combination
PC12: Community Facilities	Dee Estuary SPA/ Ramsar site Deeside and Buckley Newt SAC	This policy sets out the areas within towns and villages where new community facilities will be permitted. New community development has the potential to impact European sites through changes to water quality, disturbance/ displacement of SPA/ Ramsar site species and recreational pressure.	Detailed screening of the three allocations associated with this policy is provided in Table 20. <i>Although this policy could lead to development, new education, health and community facilities will be permitted on suitable sites within settlement boundaries. Outside settlement boundaries, development will only be permitted through conversion or extension of existing buildings, by extension to an existing facility; or adjoining a settlement boundary or on suitable brownfield or previously developed land and as such there would be no likely significant effects of this type of development on European sites</i>	No LSE alone or in combination
PE8: Development within Primary Shopping Areas	Dee Estuary SPA/ Ramsar site Deeside and Buckley Newt SAC	This policy sets out the two sites allocated for retail development. New retail development has the potential to impact European sites through changes to water quality, disturbance/ displacement of SPA/ Ramsar site species and recreational pressure.	Detailed screening of the two retail allocations associated with this policy is provided in Table 20. The detailed screening confirmed no LSE on the European sites considered in this assessment and no further assessment of these allocations alone or in combination is required.	No LSE alone or in combination
EN13: Renewable and Low Carbon Energy Development	Dee Estuary SPA/ Ramsar site Deeside and Buckley Newt SAC	This policy sets out Flintshire's scope for renewable solar and wind developments. Land is specifically allocated for three solar farms, and the policies map includes areas of potential solar development (although no sites are currently allocated in these areas). New renewable development has the potential to impact European sites through changes to water quality, disturbance/ displacement of SPA/ Ramsar site/SAC species.	Detailed screening of the two solar farms allocated under this policy are provided in Table 20. The detailed screening confirmed no LSE associated with either of the two solar farm allocations. Consultation with NRW has been carried out in relation to Castle Park, Flint (Policy: EN13, Ref: EN13.2) and a project specific HRA is currently being produced which will provide further evidence to rule out LSE associated with future development at this allocation. In relation to the areas of potential solar development (shown on the policies map), these have been identified following a rigorous filtering exercise by Flintshire Council to identify areas of search for solar in the least constrained areas of the County (including avoidance of designated sites). The policy states that: <i>All renewable or low carbon energy proposals will be permitted provided that:</i> <i>ii. the siting, design, layout, type of installation and materials used do not have a significant adverse effect on the character and features of the proposed location;</i> In the case of wind energy proposals: <i>i. the turbines are appropriately designed so as to avoid, or mitigate against, unacceptable environmental impacts, including noise, light reflection and shadow flicker.</i> Therefore, future renewable energy development will not be permitted if potential impacts on designated sites cannot be ruled out. No further assessment of this policy is required alone or in combination.	No LSE alone or in combination
EN25: Sustainable Minerals Development	Dee Estuary SPA/ Ramsar site	This policy details the proposed extension of four minerals sites. New development associated with minerals extraction has the potential to impact European sites through changes to water quality,	Detailed screening of the four minerals allocations confirmed no LSE on European sites considered in this assessment and no further assessment of these allocations alone or in combination is required.	No LSE alone or in combination

Policy	European site Potentially Affected	Potential Effects	Detailed Assessment	Conclusion
	Deeside and Buckley Newt SAC	disturbance/ displacement of SPA/ Ramsar site species and recreational pressure.		

Table 20: Detailed Screening of allocations within the LDP

Local Plan Sites	European Site to which impact pathway identified	Area (ha)	Planning Status (as at January 2019)	Site description	Potential Impacts	Conclusion
Policy STR3 – Strategic Sites (Mixed Use Allocations)						
Northern Gateway Mixed Use Development Site Ref: STR3A	River Dee and Bala Lake SAC (Adjacent) Dee Estuary SAC/SPA/Ramsar site (100 m)	166	Development at the allocation is set out within phases. Outline planning granted for 1,300 units. Construction not yet commenced.	Large site comprising mix of brownfield and farmland to the north west of Garden City and south of large industrial area.	As part of the Environmental Statement (undertaken for Praxis by Middlemarch Environmental Ltd, 2010) for the Masterplan of the allocation site, extensive ecological surveys were carried out. An Appropriate Assessment was also carried out for the Masterplan of the allocation site (undertaken for Praxis by Middlemarch Environmental Ltd, 2010, Appendix D2). The Appropriate Assessment concluded that with mitigation measures in place there would be no adverse effect on the integrity of any nearby European sites. Developments are therefore being undertaken in line with Framework Ecological Mitigation Strategies for both north (2015) and south (2017) development sites, with ecological surveys and mitigation updated for each planning application.	No adverse effect alone or in combination (with mitigation measures in place).
Warren Hall Mixed Use Development Site Ref: STR3B	No impact pathways to European sites identified	74	Outline planning granted for business park. Allocation for 300 new homes. Site will include 22.7ha of B1 and high-quality B2 employment land, commercial hub, strategic landscaping and GI network and sustainable transport links with nearby settlements.	Greenfield site to the south west of Broughton.	None anticipated.	No LSE alone or in combination.
Policy HN1 - Main Service Centres						
Well Street, Buckley Ref: HN1.1	No impact pathways to European sites identified	5.3	A planning application is expected this year. Total allocation for 159 units.	Housing allocation in UDP. The site is likely to come forward as part of the Council's own house building New Homes programme. Site comprises two arable fields on south western edge of Buckley.	None anticipated	No LSE alone or in combination
Broad Oak, Holding, Mold Rd, Connah's Quay Ref: HN1.2	Deeside and Buckley Newt Sites SAC (15 m)	1.3	Application reference 058583 is being considered for the construction of 33 no. dwellings. Total allocation for 32 units.	Part of a larger UDP housing allocation. Site comprises two small horse grazed pasture fields on western edge of Connah's Quay.	Recreational pressure The allocation is located 15 m to the north of Broad Oak Nature Reserve which forms one of the SAC compartments. Whilst there are no direct access points adjacent to the allocation into the nature reserve, there is public access into the site. The management plan for the SAC acknowledges the regular recreational use of a number of the compartments that form the SAC. Recreational activities likely to cause the most harm to the qualifying features are identified as fishing and off-roading, both of these activities are restricted within the SAC boundaries. The SAC management plan includes regular management of the ponds and terrestrial habitats to ensure they remain suitable and surveys are undertaken regularly to monitor the population. The addition of 37 new dwellings close to the SAC could lead to an increase in recreational use of the site, however, management practices already in place would ensure that a likely significant effect does not occur. In addition, as the allocation lies within 500m of the SAC, any future development at the site would also be required to comply with the Great Crested Newt Mitigation Requirements Supplementary Planning Guidance which will accompany the LDP. In combination effects There are no other allocations which would affect the same SAC compartment, and therefore potential in combination effects can be ruled out.	No LSE alone or in combination
Highmere Drive, Connah's Quay Ref: HN1.3	Dee Estuary SAC/SPA/Ramsar site (900 m)	5.0	There is a pre-application under consideration for 100 affordable dwellings. Total allocation for 150 units.	Housing allocation in UDP. Site comprises a single arable field along the western edge of Connah's Quay.	Recreational Pressure The allocation is located 900 m from the Dee Estuary. There is the potential for increased disturbance to species/habitats associated with the Dee Estuary through an increase in visitor numbers as a result of new residential development within 3.5 km of the European sites. However, given the size of the site (150 houses), and access to existing recreational areas, there would be no likely significant effects alone. In combination effects	No LSE alone Further In combination assessment required

					Although not significant alone, the site will be considered in combination with all other residential developments within 3.5 km of the SPA/ Ramsar site/SAC.	
Northop Road, Flint Ref: HN1.4	Dee Estuary SAC/SPA/Ramsar site (1.5 km)	9.1	Total allocation for 170 units	Site comprises three arable fields and a grassland field to the east. The site is located south of Flint.	<p>Recreational Pressure</p> <p>The allocation is located 1.5 km from the Dee Estuary. There is the potential for increased disturbance to species/habitats associated with the Dee Estuary through an increase in visitor numbers as a result of new residential development within 3.5 km of the European sites. However, given the relatively small size of the site (170 houses), and access to existing recreational areas within Flint to the north of the allocation, there would be no likely significant effects alone.</p> <p>In combination effects</p> <p>Although not significant alone, the site will be considered in combination with all other residential developments within 3.5 km of the SPA/ Ramsar site/SAC.</p>	No LSE alone Further In combination assessment required
Maes Gwern, Mold Ref: HN1.5	No impact pathways to European sites identified	5.7	Planning permission granted 25/07/2018 and construction started. Total allocation for 160 units.	Inside Mold settlement boundary in UDP. Site on southern edge of Mold, already under construction	None anticipated	No LSE alone or in combination
Land between Denbigh Road and Gwernaffield Rd, Mold Ref: HN1.6	No impact pathways to European sites identified	12.1	Anwyl Homes have submitted a pre-application and are working towards planning application for 246 units. Total allocation for 246 units.	Open countryside abutting settlement boundary in UDP. Flood risk on part of MOL044. Site comprises two areas of grazing pasture on north western edge of Mold.	None anticipated	No LSE alone or in combination

Policy HN1 - Local Service Centres

Holywell Road/ Green Lane, Ewloe Ref: HN1.7	Deeside and Buckley Newt Sites SAC (170 m) Dee Estuary SAC/SPA/Ramsar site (2.6 km)	9.9	No recent planning history. Total allocation for 288 units.	Open countryside and green barrier in UDP abutting settlement boundary. Site comprises a series of arable and grassland fields on the north western edge of Ewloe Green.	<p>Recreational pressure (Dee and Buckley Newt SAC)</p> <p>The allocation is located within 170 m of Wepre Park Country Park which forms one of the SAC compartments. A public footpath from the western boundary of the allocation provides a direct link north to the edge of the Park, a walk of approximately 560 m. It is also possible to access the Park via the B5125 from the northern end of the allocation, a distance of approximately 490 m. The SAC compartment is already exposed to regular recreational activity. The management plan for the SAC acknowledges the regular recreational use of a number of the compartments that form the SAC. Recreational activities likely to cause the most harm to the qualifying features are identified as fishing and off-roading, both of these activities are restricted within the SAC boundaries. The SAC management plan includes regular management of the ponds and terrestrial habitats to ensure they remain suitable and surveys are undertaken regularly to monitor the population. Whilst the addition of 225 units close to the SAC could lead to an increase in recreational use of the site, management practices already in place would ensure that a likely significant effect does not occur. In addition, any future development at the site would also be required to comply with the Great Crested Newt Mitigation Requirements Supplementary Planning Guidance which will accompany the LDP.</p> <p>Recreational pressure (Dee Estuary SPA/ Ramsar site/SAC)</p> <p>The allocation is located 2.6km from the Dee Estuary. There is the potential for increased disturbance to species/habitats associated with the Dee Estuary through an increase in visitor numbers as a result of new residential development within 3.5 km of the European sites. Given the size of the site (255 houses), and access to alternative recreational areas, there would be no likely significant effects alone.</p> <p>In combination effects (Dee Estuary SPA/ Ramsar site/SAC)</p> <p>Although not significant alone, the site will be considered in combination with all other residential developments within 3.5 km of the SPA/ Ramsar site/SAC.</p>	No LSE alone Further In combination assessment required
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Ash Lane, Hawarden Ref: HN1.8	Dee Estuary SAC/SPA/Ramsar site (2.3 km)	9.6	No recent planning history. Some concern about impact on setting on the grade 1 listed building. Total allocation for 288 units	Open countryside and green barrier in UDP abutting settlement boundary. Site comprises five grassland/arable fields surrounded to the west, north and east by Mancot and Little Mancot.	Recreational pressure The allocation is located 2.3 m from the Dee Estuary. There is the potential for increased disturbance to species/habitats associated with the Dee Estuary through an increase in visitor numbers as a result of new residential development within 3.5 km of the European sites. Given the size of the site (288 houses), and access to alternative recreational areas, there would be no likely significant effects alone. In combination effects Although not significant alone, the site will be considered in combination with all other residential developments within 3.5 km of the SPA/ Ramsar site/ SAC.	No LSE alone Further In combination assessment required
Wrexham Rd, HCAC Ref:HN1.9	No impact pathways to European sites identified	3.5	An outline application for up to 80 dwellings is currently under consideration reference 058163. Total allocation for 80 units.	Open countryside in UDP. Grade 2 agricultural land. Site comprises two grassland fields on western edge of Abermorddu.	None anticipated	No LSE alone or in combination.
Policy HN1 - Sustainable Villages						
Cae Isa, A5119, New Brighton Ref: HN1.10	No impact pathways to European sites identified	3.5	Open countryside and green barrier in UDP abutting settlement boundary. No recent planning history. Total allocation for 105 units.	Site comprises a single grassland field with patches of soft rush / scrub on northern edge of New Brighton.	None anticipated	No LSE alone or in combination.
Chester Road, Penymynydd Ref: HN1.11	No impact pathways to European sites identified	7.7	Planning permission granted on appeal and construction started. Total allocation for 186 units.	Site on eastern edge of Penymynydd, already under construction	None anticipated	No LSE alone or in combination.
Policy HN8 - Gypsy and Traveller Sites						
Magazine Lane, Ewloe (Extension) Ref: HN8.1	Deeside and Buckley Newt Sites SAC (400m)	0.26ha	No recent planning history	New allocation since the UDP. The site comprises a single small field surrounded by trees. The allocation site is adjacent to the A55 and existing development.	None anticipated	No LSE alone or in combination
Gwern Lane, Cae Estyn, Hope (Extension) Ref: HN8.2	No impact pathways to European sites identified	0.29ha	No recent planning history	New allocation since the UDP. The site comprises a small grassland field.	None anticipated	No LSE alone or in combination
Riverside, Queensferry (Extension) Ref: HN8.3	Dee Estuary SAC/SPA/Ramsar site (100 m)	1.57ha	No recent planning history	New allocation since the UDP. The site comprises hardstanding and scrub. The allocation site is surrounded by existing development.	None anticipated	No LSE alone or in combination

Castle Park Industrial Estate Ref: HN8.4	Dee Estuary SAC/SPA/Ramsar site (adjacent)	0.13ha	No recent planning history	New allocation since the UDP. The site comprises a small area of hardstanding adjacent to the Estuary.	Disturbance/ displacement of Dee Estuary SPA/ Ramsar site species The allocation is surrounded by woodland and scrub, screening the site from the nearby Estuary. The small-scale use of the allocation as a transit site for up to six gypsy and traveller pitches would not lead to significant disturbance/ displacement effects on the Dee Estuary SPA/ Ramsar site species alone or in combination.	No LSE alone or in combination
Policy PE1 - Employment Allocations						
Chester Aerospace Park Ref: PE1.1	Dee Estuary SPA/Ramsar site (5 km)	5.72	Planning permission granted for new industrial unit and parking at south west of allocation. Planning permission under consideration for industrial units and car parking at the northern end of the allocation.	New allocation boundary, changed since UDP Site comprises a single field site adjacent to existing Hawarden Business Park and Airfield	None anticipated	No LSE alone or in combination
Manor Lane/Hawarden Park Extension Ref PE1.2	Dee Estuary SPA/Ramsar site (5 km)	18.2	Planning permission granted for industrial units and car parking (phased development)	Allocation to the south of existing industrial park to cater for aerospace sector spin-offs and enable improved access in UDP. Site comprises three fields adjacent to existing Hawarden Business Park and Airfield	None anticipated	No LSE alone or in combination
Drury New Road Ref: PE1.3	Deeside and Buckley Newt Sites SAC (adjacent)	1.4	No recent planning history	New allocation to reflect vacant land to the north of access road to former Optec factory in the UDP. Site comprises a single field. Existing development to the south and west. Drury New Road to the east	Recreational pressure The allocation is directly adjacent to the SAC on its northern and western boundaries. A footpath is present to the west of the allocation which links to other footpaths within the SAC boundary. Whilst there is the potential for new employees to utilise the adjacent footpath, realistically it is unlikely that there would be an increase in recreational use of the SAC from this type of development. As the allocation lies within 500m of the SAC, any future development at the site would also be required to comply with the Great Crested Newt Mitigation Requirements Supplementary Planning Guidance. In combination effects One other allocation could affect the same SAC compartment (Chester Rd / Bannel Lane, Buckley Ref: BUC030/ 037). Whilst the addition of 129 units close to the SAC could lead to an increase in recreational use of the site, the addition of the Drury New Road employment site would not add to the potential impact (as described for the Chester Rd/ Bannel Lane allocation, management practices already in place for the SAC, and the requirement to comply with the Great Crested Newt Mitigation Requirements Supplementary Planning Guidance would ensure that a likely significant effect does not occur). Therefore, potential in combination effects can be ruled out.	No LSE alone or in combination
Greenfield Business Park, Phase II Ref: PE1.4	Dee Estuary SAC/SPA/Ramsar site (adjacent)	1.2	No recent planning history	New allocation boundary, changed since UDP Small brown field site adjacent to the exiting development within Greenfield Business Park	Recreational pressure Although the wales coast path borders the north of the allocation, given that the allocation is located within an existing industrial area, these new developments are unlikely to contribute to a significant increase in the number of people working in those areas. It is also considered unlikely that new employees from any future development of these small development sites would choose to regularly use this footpath in large numbers such that they would have a likely significant effect on a European site alone, or in combination. Disturbance/ displacement of Dee Estuary SPA/ Ramsar site species The intertidal habitat within the Estuary, adjacent to the allocation, is known to support wintering waders and waterfowl (the nearest high tide roost (for oystercatcher) is more than 2km south of the allocation). Although there may be some localised disturbance/ displacement to birds in the vicinity of works (should they take place during the winter), it is considered unlikely to have a significant effect on the qualifying species of the SPA/ Ramsar site alone or in combination with the other three developments adjacent to the Estuary (which would be phased throughout the plan period, and therefore unlikely to be all developed at the same time). Water quality Although there is not a direct link with the Estuary from the allocation, it does lie directly adjacent, and therefore there is the potential for construction site run off. However, given the small-scale (1 ha), short-term nature of any future development at the site, in conjunction with the requirement to comply with	No LSE alone or in combination

					standard CIRA guidance and Policy STR13 within the LDP, no likely significant effects on the water quality of the adjacent SPA/ Ramsar site/ SAC are anticipated alone or in combination.	
Greenfield Business Park, Phase III Ref: PE1.5	Dee Estuary SAC/SPA/Ramsar site (adjacent)	4.4	Planning permission granted for works in the north west compartment. Planning application pending for warehouse and offices within the south west compartment.	New allocation boundary, changed since UDP Sites comprises two compartments made up of predominantly scrub with small sections of grassland and hard standing (within the exiting development within Greenfield Business Park)	<p>Recreational pressure</p> <p>Although the wales coast path borders the north of the allocation, given that the allocation is located within an existing industrial area, these new developments are unlikely to contribute to a significant increase in the number of people working in those areas. It is also considered unlikely that new employees from any future development of these small development sites would choose to regularly use this footpath in large numbers such that they would have a likely significant effect on a European site alone, or in combination.</p> <p>Disturbance/ displacement of Dee Estuary SPA/ Ramsar site species</p> <p>The intertidal habitat within the Estuary, to the north east of the allocation, is known to support wintering waders and waterfowl (nearest high tide roost (for oystercatcher) more than 1.3km south of the allocation). The compartment to the southwest is more than 300 m from the estuary, and is separated from the SPA/ Ramsar site by existing vegetation and the railway line. No significant disturbance/ displacement effects from any future development at this location are considered likely. Although the second compartment is closer to the estuary (less than 100 m), it is also separated from the estuary by existing development and vegetation, and as such significant disturbance/ displacement effects are also considered unlikely alone or in combination with the other three developments adjacent to the Estuary (which would be phased throughout the plan period, and therefore unlikely to be all developed at the same time).</p> <p>Water quality</p> <p>Although there is not a direct link with the Estuary from the allocation, it does lie directly adjacent, and therefore there is the potential for construction site run off. However, given the small-scale (1 ha), short-term nature of any future development at the site, in conjunction with the requirement to comply with standard CIRA guidance and Policy STR13 within the LDP, no likely significant effects on the water quality of the adjacent SPA/ Ramsar site/SAC are anticipated alone or in combination.</p>	No LSE alone or in combination
Broncoed Industrial Estate Ref: PE1.6	No impact pathways to European sites identified	0.7	Planning under consideration for development at the northern end of the allocation Planning permission granted for industrial use at southern end of the allocation	New allocation boundary, changed since UDP Brownfield site within existing Broncoed Industrial Estate	None anticipated	No LSE alone or in combination
Mold Business Park Ref: PE1.7	No impact pathways to European sites identified	3.9	Planning permission granted for new office buildings and associated infrastructure	New allocation boundary, changed since UDP Site comprises existing development and areas of woodland and scrub, south of Mold	None anticipated	No LSE alone or in combination
Adjacent Mostyn Docks Ref: PE1.8 (and Policy PC11)	Dee Estuary SAC/SPA/Ramsar site (adjacent)	3.0	No recent planning history	New allocation boundary, changed since UDP Brown field site comprising scrub and grassland, adjacent to Dee Estuary.	<p>Recreational pressure</p> <p>Although the Wales Coast path borders the eastern boundary of the allocation, given that the allocation is located within an existing industrial area, these new developments are unlikely to contribute to a significant increase in the number of people working in those areas. It is also considered unlikely that new employees from any future development of these small development sites would choose to regularly use this footpath in large numbers such that they would have a likely significant effect on a European site alone, or in combination.</p> <p>Disturbance/ displacement of Dee Estuary SPA/ Ramsar site species</p> <p>The intertidal habitat within the Estuary, adjacent to the allocation, is known to support wintering wader and waterfowl (including a high tide roost for oystercatcher). Although there may be some localised disturbance/ displacement to birds in the vicinity of the works (should they take place during the winter), it is considered that this is unlikely to have a significant effect on the qualifying species of the SPA/ Ramsar site alone or in combination with the other three developments adjacent to the Estuary (which</p>	No LSE alone or in combination

					would be phased throughout the plan period, and therefore unlikely to be all developed at the same time). Water quality Although there is not a direct link with the Estuary from the allocation, it does lie directly adjacent, and therefore there is the potential for construction site run off. However, given the small-scale (3 ha), short-term nature of any future development at the site, in conjunction with the requirement to comply with standard CIRA guidance and Policy STR13 within the LDP, no likely significant effects on the water quality of the adjacent SPA/ Ramsar site/SAC are anticipated alone or in combination. Policy PC11 within the LDP also states that ' <i>Development proposals which enhance the transport and employment role of the docks will be permitted provided that such proposals do not have a significant adverse effect on the ecological, landscape, historic, recreational integrity and water and air quality of the Dee Estuary</i> '.	
Chester Road East Ref: PE1.9	Dee Estuary SAC/SPA/Ramsar site (1.7 km) River Dee and Bala Lake SAC (475 m)	3.15	Planning permission refused on western part of the allocation (in relation to flood risk) No other current planning applications on the site	New allocation boundary, changed since UDP Site comprises an area of scrub and rough grassland surrounded by existing development and roads on all sides.	None anticipated	No LSE alone or in combination
Antelope Industrial Estate Ref: PE1.10	No impact pathways to European sites identified	1.1	No recent planning history	Retained as an allocation in the UDP Site comprises two areas of grassland adjacent to existing industrial units within Antelope Industrial Estate	None anticipated	No LSE alone or in combination
River Lane, Saltney Ref: PE1.11	River Dee and Bala Lake SAC (20 m)	1.08	No recent planning history	New allocation boundary, changed since UDP Existing industrial area/ brown field site, surrounded by development to the south, east and west. The River Dee lies adjacent to the northern boundary.	Water quality Although there is not a direct link with the River Dee from the allocation, it does lie directly adjacent to River Dee and Bala Lake SAC, and therefore there is the potential for construction site run off. However, given the small-scale (1 ha), short-term nature of any future redevelopment at the site, in conjunction with the requirement to comply with standard CIRA guidance and Policy STR13 within the LDP, no likely significant effects on the water quality of the adjacent SAC are anticipated alone or in combination.	No LSE alone or in combination
Rowley's Drive Ref: PE1.12	Dee Estuary SAC/SPA/Ramsar site (390 m) River Dee and Bala Lake SAC (390 m)	0.7	Outline planning application on the northern compartment for car sales, commercial units and storage area. Application for units and car parking on the southern compartment refused.	New allocation boundary, changed since UDP Two small compartments within existing industrial area. One compartment comprises scrub and woodland, and the second hard standing.	Recreational pressure Although there is the potential to reach the Dee Estuary SPA/Ramsar site/ SAC from the allocation (via a public footpath to the east of the allocation which leads to the Wales Coast), realistically, it is considered unlikely that new employees from any future development of the site would choose to regularly use this footpath in large numbers such that they would have a likely significant effect on a European site alone. There are no other employment sites in the vicinity which could affect the same area of coast, and therefore there would be no in combination effects.	No LSE alone or in combination

Policy PE2 – Principal Employment Areas

Ewole Barns (Industrial Estate), Alltami Ref: PE2.1	River Dee and Bala Lake SAC (4.7km) Deeside and Buckley Newt Sites SAC (adjacent)	4.91	No recent planning history	Existing industrial area/ brown field site, surrounded by agricultural land.	Recreational pressure The allocation is directly adjacent to the SAC on its southern boundary. A footpath is present within the allocation which links to other footpaths within the SAC boundary. Whilst there is the potential for new employees to utilise the adjacent footpath, realistically it is unlikely that there would be an increase in recreational use of the SAC from this type of development. As the allocation lies within 500m of the SAC, any future development at the site would also be required to comply with the Great Crested Newt Mitigation Requirements Supplementary Planning Guidance.	No LSE alone or in combination
Alltami Depot, Alltami Ref: PE2.2	River Dee and Bala Lake SAC (4.7km) Deeside and Buckley Newt Sites SAC (101m)	8.76	No recent planning history	Existing industrial area/ brown field site, surrounded by agricultural land and a quarry	Recreational pressure The allocation is directly adjacent to the SAC on its eastern boundary. A footpath is present within the allocation which links to other footpaths within the SAC boundary. Whilst there is the potential for new employees to utilise the adjacent footpath, realistically it is unlikely that there would be an increase in recreational use of the SAC from this type of development. As the allocation lies within 500m of the SAC, any future development at the site would also be required to comply with the Great Crested Newt Mitigation Requirements Supplementary Planning Guidance.	No LSE alone or in combination

Manor Industrial Estate, Bagillt Ref: PE2.3	Dee Estuary SAC/SPA/Ramsar site (358m) River Dee and Bala Lake SAC (6.5km)	12.4	No recent planning history	Existing Industrial area surrounded by woodland and bounded by the railway line and the A548	None anticipated	No LSE alone or in combination
Broughton Mills, Broughton Ref: PE2.4	River Dee and Bala Lake SAC (1.3km) Deeside and Buckley Newt Sites SAC (6.3km)	7.96	No recent planning history	Existing Industrial area, surrounded by agricultural land and an airport to the north	None anticipated	No LSE alone or in combination
Catheralls Industrial Estate and Pinfold Industrial Estate, Buckley Ref: PE2.5	River Dee and Bala Lake SAC (4.7km) Deeside and Buckley Newt Sites SAC (adjacent)	7.03	No recent planning history	Existing Industrial area, surrounded by agricultural land	Recreational pressure The allocation is directly adjacent to the SAC on its northern boundary. A footpath is present within the allocation which links to other footpaths within the SAC boundary. Whilst there is the potential for new employees to utilise the adjacent footpath, realistically it is unlikely that there would be an increase in recreational use of the SAC from this type of development. As the allocation lies within 500m of the SAC, any future development at the site would also be required to comply with the Great Crested Newt Mitigation Requirements Supplementary Planning Guidance.	No LSE alone or in combination
Drury Lane Industrial Estate, Buckley Ref: PE2.6	Dee Estuary SAC/SPA/Ramsar site (6.4km) River Dee and Bala Lake SAC (5km) Deeside and Buckley Newt Sites SAC (154m)	1.71	No recent planning history	Existing Industrial area, surrounded by grassland and woodland	None anticipated	No LSE alone or in combination
Little Mountain Industrial Estate, Buckley Ref: PE2.7	River Dee and Bala Lake SAC (5.6km) Deeside and Buckley Newt Sites SAC (adjacent)	8.71	No recent planning history	Existing Industrial area, surrounded by agricultural land and woodland	Recreational pressure The allocation is directly adjacent to the SAC on its northern boundary. A footpath is present within the allocation which links to other footpaths within the SAC boundary. Whilst there is the potential for new employees to utilise the adjacent footpath, realistically it is unlikely that there would be an increase in recreational use of the SAC from this type of development. As the allocation lies within 500m of the SAC, any future development at the site would also be required to comply with the Great Crested Newt Mitigation Requirements Supplementary Planning Guidance.	No LSE alone or in combination
Spencer Industrial Estate, Buckley Ref: PE2.8	River Dee and Bala Lake SAC (4.9km) Deeside and Buckley Newt Sites SAC (adjacent)	7.26	No recent planning history	Existing Industrial area, surrounded by grassland and woodland	Recreational pressure The allocation is directly adjacent to the SAC on its northern and western boundaries. A footpath is present within the allocation which links to other footpaths within the SAC boundary. Whilst there is the potential for new employees to utilise the adjacent footpath, realistically it is unlikely that there would be an increase in recreational use of the SAC from this type of development. As the allocation lies within 500m of the SAC, any future development at the site would also be required to comply with the Great Crested Newt Mitigation Requirements Supplementary Planning Guidance.	No LSE alone or in combination
Evans Business Centre, Chester West Ref: PE2.9	River Dee and Bala Lake SAC (994m)	7.81	No recent planning history	Existing Industrial area, surrounded by agricultural land and existing development	None anticipated	No LSE alone or in combination

<p>Dock Road, Connah's Quay Ref: PE2.10</p>	<p>Dee Estuary SAC/SPA/Ramsar site (1.2km) River Dee and Bala Lake SAC (adjacent)</p>	<p>13.8</p>	<p>No recent planning history</p>	<p>Existing Industrial area adjacent to the River Dee with an area of scrub</p>	<p>Recreational pressure Although the Wales coast path borders the north of the allocation, given that the allocation is located within an existing industrial area, these new developments are unlikely to contribute to a significant increase in the number of people working in those areas. It is also considered unlikely that new employees from any future development of these small development sites would choose to regularly use this footpath in large numbers such that they would have a likely significant effect on a European site alone, or in combination.</p> <p>Water quality Although there is not a direct link with the River Dee from the allocation, it does lie directly adjacent to River Dee and Bala Lake SAC, and therefore there is the potential for construction site run off. However, given the small-scale (1 ha), short-term nature of the Construction Phase of any future redevelopment at the site, in conjunction with the requirement to comply with standard CIRA guidance and Policy STR13 within the LDP, no likely significant effects on the water quality of the adjacent SAC are anticipated alone or in combination.</p>	<p>No LSE alone or in combination</p>
<p>Deeside Industrial Park, DARA and Northern Gateway, Deeside Ref: PE2.11</p>	<p>Dee Estuary SAC/SPA/Ramsar site (182m) River Dee and Bala Lake SAC (adjacent)</p>	<p>930.3</p>	<p>Development at the Northern Gateway Mixed Use Development Site allocation is set out within phases. Outline planning granted for 1,300 units. Construction not yet commenced.</p>	<p>Large site comprising mix of brownfield and farmland to the north west of Garden City and south of large industrial area.</p>	<p>Recreational pressure Although the Wales coast path borders the south of the allocation, given that the allocation is located within an existing industrial area, these new developments are unlikely to contribute to a significant increase in the number of people working in those areas. It is also considered unlikely that new employees from any future development of these small development sites would choose to regularly use this footpath in large numbers such that they would have a likely significant effect on a European site alone, or in combination.</p> <p>Water quality Although there is not a direct link with the River Dee from the allocation, it does lie directly adjacent to River Dee and Bala Lake SAC, and therefore there is the potential for construction site run off. However, given the small-scale (1 ha), short-term nature of the Construction Phase any future redevelopment at the site, in conjunction with the requirement to comply with standard CIRA guidance and Policy STR13 within the LDP, no likely significant effects on the water quality of the adjacent SAC are anticipated alone or in combination.</p>	<p>No LSE alone or in combination</p>
<p>St David's Park, Ewloe Ref: PE2.12</p>	<p>Dee Estuary SAC/SPA/Ramsar site (4.8km) River Dee and Bala Lake SAC (3.1km) Deeside and Buckley Newt Sites SAC (697m)</p>	<p>13.44</p>	<p>No recent planning history</p>	<p>Existing Industrial area, surrounded by existing development and roads.</p>	<p>None anticipated</p>	<p>No LSE alone or in combination</p>
<p>Ashmount Industrial Estate, Flint Ref: PE2.13</p>	<p>Dee Estuary SAC/SPA/Ramsar site (adjacent) River Dee and Bala Lake SAC (4.6km)</p>	<p>13.7</p>	<p>No recent planning history</p>	<p>Existing Industrial area adjacent to the River Dee and parkland.</p>	<p>Recreational pressure Although the Wales coast path borders the south of the allocation, given that the allocation is located within an existing industrial area, these new developments are unlikely to contribute to a significant increase in the number of people working in those areas. It is also considered unlikely that new employees from any future development of these small development sites would choose to regularly use this footpath in large numbers such that they would have a likely significant effect on a European site alone, or in combination.</p> <p>Disturbance/ displacement of Dee Estuary SPA/ Ramsar site species The intertidal habitat within the Estuary, adjacent to the allocation, is known to support wintering wader and waterfowl (including a high tide roost for oystercatcher). Although there may be some localised disturbance/ displacement to birds in the vicinity of construction works (should they take place during the winter), it is considered that this is unlikely to have a significant effect on the qualifying species of the SPA/ Ramsar site alone or in combination with the other three developments adjacent to the Estuary (which would be phased throughout the plan period, and therefore unlikely to be all developed at the same time).</p>	<p>No LSE alone or in combination</p>

					<p>Water quality</p> <p>Although there is not a direct link with the Estuary from the allocation, it does lie directly adjacent, and therefore there is the potential for construction site run off. However, given the small-scale (3 ha), short-term nature of the Construction Phase associated with any future development at the site, in conjunction with the requirement to comply with standard CIRA guidance and Policy STR13 within the LDP, no likely significant effects on the water quality of the adjacent SPA/ Ramsar site/SAC are anticipated alone or in combination. Policy PC11 within the LDP also states that '<i>Development proposals which enhance the transport and employment role of the docks will be permitted provided that such proposals do not have a significant adverse effect on the ecological, landscape, historic, recreational integrity and water and air quality of the Dee Estuary</i>'.</p>	
Castle Park/ Ashmount Industrial Centre, Flint Ref: PE2.14	Dee Estuary SAC/SPA/Ramsar site (93m) River Dee and Bala Lake SAC (4.6km)	23.7	No recent planning history	Existing Industrial area surrounded by existing development and woodland	None anticipated	No LSE alone or in combination
Greenfield Business Park, Greenfield Ref: PE2.15	Dee Estuary SAC/SPA/Ramsar site (adjacent)	36	Planning permission granted for works in the north west compartment. Planning application pending for warehouse and offices within the south west compartment.	Existing Industrial area adjacent to the River Dee and either side of the railway line	<p>Recreational pressure</p> <p>Although the Wales coast path borders the north of the allocation, given that the allocation is located within an existing industrial area, these new developments are unlikely to contribute to a significant increase in the number of people working in those areas. It is also considered unlikely that new employees from any future development of these small development sites would choose to regularly use this footpath in large numbers such that they would have a likely significant effect on a European site alone, or in combination.</p> <p>Disturbance/ displacement of Dee Estuary SPA/ Ramsar site species</p> <p>The intertidal habitat within the Estuary, adjacent to the allocation, is known to support wintering wader and waterfowl (including a high tide roost for oystercatcher). Although there may be some localised disturbance/ displacement to birds in the vicinity of the works (should construction works take place during the winter), it is considered that this is unlikely to have a significant effect on the qualifying species of the SPA/ Ramsar site alone or in combination with the other three developments adjacent to the Estuary (which would be phased throughout the plan period, and therefore unlikely to be all developed at the same time).</p> <p>Water quality</p> <p>Although there is not a direct link with the Estuary from the allocation, it does lie directly adjacent, and therefore there is the potential for construction site run off. However, given the small-scale (3 ha), short-term nature of the Construction Phase associated with any future development at the site, in conjunction with the requirement to comply with standard CIRA guidance and Policy STR13 within the LDP, no likely significant effects on the water quality of the adjacent SPA/ Ramsar site/SAC are anticipated alone or in combination. Policy PC11 within the LDP also states that '<i>Development proposals which enhance the transport and employment role of the docks will be permitted provided that such proposals do not have a significant adverse effect on the ecological, landscape, historic, recreational integrity and water and air quality of the Dee Estuary</i>'.</p>	No LSE alone or in combination
Hawarden Industrial Park, Chester Aerospace Park and Hawarden Airport, Hawarden Ref: PE2.16	Dee Estuary SAC/SPA/Ramsar site (7.4km) River Dee and Bala Lake SAC (737m) Deeside and Buckley Newt Sites SAC (5km)	369.47	Planning permission granted for new industrial unit and parking at south west of allocation. Planning permission under consideration for industrial units and car parking at the northern end of the allocation.	Existing Industrial area and airport surrounded by agricultural land	None anticipated	No LSE alone or in combination
Broncoed Industrial Estate, Mold Ref: PE2.17	Deeside and Buckley Newt Sites SAC (3.5km)	3.88	Planning under consideration for development at the northern end of the allocation Planning permission granted for industrial use at southern end of the allocation	Existing Industrial area surrounded by exiting development and roads	None anticipated	No LSE alone or in combination

Mold Business Park, Mold Ref: PE2.18	Deeside and Buckley Newt Sites SAC (3.5km)	2.87	Planning permission granted for new office buildings and associated infrastructure	Existing Industrial area surrounded by exiting development and roads	None anticipated	No LSE alone or in combination
Mold Industrial Estate, Mold Ref: PE2.19	Deeside and Buckley Newt Sites SAC (2.9km)	16.27	No recent planning history	Existing Industrial area surrounded by exiting development and roads	None anticipated	No LSE alone or in combination
Mostyn Docks, Mostyn Ref: PE2.20	Dee Estuary SAC/SPA/Ramsar site (adjacent)	28.7	No recent planning history	Existing Industrial area surrounded by the River Dee	<p>Recreational pressure</p> <p>Although the Wales Coast path borders the eastern boundary of the allocation, given that the allocation is located within an existing industrial area, these new developments are unlikely to contribute to a significant increase in the number of people working in those areas. It is also considered unlikely that new employees from any future development of these small development sites would choose to regularly use this footpath in large numbers such that they would have a likely significant effect on a European site alone, or in combination.</p> <p>Disturbance/ displacement of Dee Estuary SPA/ Ramsar site species</p> <p>The intertidal habitat within the Estuary, adjacent to the allocation, is known to support wintering wader and waterfowl (including a high tide roost for oystercatcher). Although there may be some localised disturbance/ displacement to birds in the vicinity of the construction works (should they take place during the winter), it is considered that this is unlikely to have a significant effect on the qualifying species of the SPA/ Ramsar site alone or in combination with the other three developments adjacent to the Estuary (which would be phased throughout the plan period, and therefore unlikely to be all developed at the same time).</p> <p>Water quality</p> <p>Although there is not a direct link with the Estuary from the allocation, it does lie directly adjacent, and therefore there is the potential for construction site run off. However, given the small-scale (3 ha), short-term nature of the Construction Phase associated with any future development at the site, in conjunction with the requirement to comply with standard CIRA guidance and Policy STR13 within the LDP, no likely significant effects on the water quality of the adjacent SPA/ Ramsar site/SAC are anticipated alone or in combination. Policy PC11 within the LDP also states that '<i>Development proposals which enhance the transport and employment role of the docks will be permitted provided that such proposals do not have a significant adverse effect on the ecological, landscape, historic, recreational integrity and water and air quality of the Dee Estuary</i>'.</p>	No LSE alone or in combination
Pentre Industrial Estate, Pentre Ref: PE2.21	Dee Estuary SAC/SPA/Ramsar site (4.5km) River Dee and Bala Lake SAC (458m) Deeside and Buckley Newt Sites SAC (2.4km)	15.75	No recent planning history	Existing Industrial area, surrounded by existing development and adjacent to the railway line	None anticipated	No LSE alone or in combination
Queensferry Industrial Estate, Pentre Ref: PE2.22	Dee Estuary SAC/SPA/Ramsar site (4.4km) River Dee and Bala Lake SAC (adjacent) Deeside and Buckley Newt	36.58	No recent planning history	Existing Industrial area, adjacent to the River Dee and the railway line	<p>Recreational pressure</p> <p>Although the Wales coast path borders the north of the allocation, given that the allocation is located within an existing industrial area, these new developments are unlikely to contribute to a significant increase in the number of people working in those areas. It is also considered unlikely that new employees from any future development of these small development sites would choose to regularly use this footpath in large numbers such that they would have a likely significant effect on a European site alone, or in combination.</p>	No LSE alone or in combination

	Sites SAC (2.4km)				Water quality Although there is not a direct link with the River Dee from the allocation, it does lie directly adjacent to River Dee and Bala Lake SAC, and therefore there is the potential for construction site run off. However, given the small-scale (1 ha), short-term nature of the Construction Phase associated with any future redevelopment at the site, in conjunction with the requirement to comply with standard CIRA guidance and Policy STR13 within the LDP, no likely significant effects on the water quality of the adjacent SAC are anticipated alone or in combination.	
Expressway Business Park, Queensferry Ref: PE2.23	Dee Estuary SAC/SPA/Ramsar site (3.9km) River Dee and Bala Lake SAC (161m) Deeside and Buckley Newt Sites SAC (2.1km)	1.99	No recent planning history	Existing Industrial area, surrounded by existing development	None anticipated	No LSE alone or in combination
Antelope Industrial Park, Rhydymwyn Ref: PE2.24	No impact pathways to European sites identified	5.06	No recent planning history	Existing Industrial area, surrounded by woodland	None anticipated	No LSE alone or in combination
Brymau One, Two and Three Estates and Glen Industrial Estate, Saltney Ref: PE2.25	River Dee and Bala Lake SAC (adjacent)	12	No recent planning history	Existing Industrial area, adjacent to the River Dee	Recreational pressure Although the Wales coast path borders the north of the allocation, given that the allocation is located within an existing industrial area, these new developments are unlikely to contribute to a significant increase in the number of people working in those areas. It is also considered unlikely that new employees from any future development of these small development sites would choose to regularly use this footpath in large numbers such that they would have a likely significant effect on a European site alone, or in combination. Water quality Although there is not a direct link with the River Dee from the allocation, it does lie directly adjacent to River Dee and Bala Lake SAC, and therefore there is the potential for construction site run off. However, given the small-scale (1 ha), short-term nature of the Construction Phase associated with any future redevelopment at the site, in conjunction with the requirement to comply with standard CIRA guidance and Policy STR13 within the LDP, no likely significant effects on the water quality of the adjacent SAC are anticipated alone or in combination.	No LSE alone or in combination
The Borders Industrial Park, Chesterbank Industrial Park and Brymau Four Estate, Saltney Ref: PE2.26	River Dee and Bala Lake SAC (adjacent)	12.21	No recent planning history	Existing Industrial area, adjacent to the River Dee	Recreational pressure Although the Wales coast path borders the north of the allocation, given that the allocation is located within an existing industrial area, these new developments are unlikely to contribute to a significant increase in the number of people working in those areas. It is also considered unlikely that new employees from any future development of these small development sites would choose to regularly use this footpath in large numbers such that they would have a likely significant effect on a European site alone, or in combination. Water quality Although there is not a direct link with the River Dee from the allocation, it does lie directly adjacent to River Dee and Bala Lake SAC, and therefore there is the potential for construction site run off. However, given the small-scale (1 ha), short-term nature of the construction works associated with any future redevelopment at the site, in conjunction with the requirement to comply with standard CIRA guidance and Policy STR13 within the LDP, no likely significant effects on the water quality of the adjacent SAC are anticipated alone or in combination.	No LSE alone or in combination

<p>Engineer Park and St Ives Park, Sandycroft Ref: PE2.27</p>	<p>Dee Estuary SAC/SPA/Ramsar site (5.3km) River Dee and Bala Lake SAC (adjacent) Deeside and Buckley Newt Sites SAC (3.3km)</p>	<p>25.75</p>	<p>No recent planning history</p>	<p>Existing Industrial area, adjacent to the River Dee and the railway line</p>	<p>Recreational pressure Although the Wales coast path borders the north of the allocation, given that the allocation is located within an existing industrial area, these new developments are unlikely to contribute to a significant increase in the number of people working in those areas. It is also considered unlikely that new employees from any future development of these small development sites would choose to regularly use this footpath in large numbers such that they would have a likely significant effect on a European site alone, or in combination.</p> <p>Water quality Although there is not a direct link with the River Dee from the allocation, it does lie directly adjacent to River Dee and Bala Lake SAC, and therefore there is the potential for construction site run off. However, given the small-scale (1 ha), short-term nature of the construction works for any future redevelopment at the site, in conjunction with the requirement to comply with standard CIRA guidance and Policy STR13 within the LDP, no likely significant effects on the water quality of the adjacent SAC are anticipated alone or in combination.</p>	<p>No LSE alone or in combination</p>
<p>Glendale Business Park, Sandycroft Ref: PE2.28</p>	<p>Dee Estuary SAC/SPA/Ramsar site (5.1km) River Dee and Bala Lake SAC (458m) Deeside and Buckley Newt Sites SAC (3km)</p>	<p>13.81</p>	<p>No recent planning history</p>	<p>Existing Industrial area, surrounded by existing development and adjacent to the railway line</p>	<p>None anticipated</p>	<p>No LSE alone or in combination</p>
<p>Sandycroft Industrial Estate, Sandycroft Ref: PE2.29</p>	<p>Dee Estuary SAC/SPA/Ramsar site (5.9km) River Dee and Bala Lake SAC (adjacent) Deeside and Buckley Newt Sites SAC (3.9km)</p>	<p>32.18</p>	<p>No recent planning history</p>	<p>Existing Industrial area, adjacent to the River Dee and the railway line</p>	<p>Recreational pressure Although the Wales coast path borders the north of the allocation, given that the allocation is located within an existing industrial area, these new developments are unlikely to contribute to a significant increase in the number of people working in those areas. It is also considered unlikely that new employees from any future development of these small development sites would choose to regularly use this footpath in large numbers such that they would have a likely significant effect on a European site alone, or in combination.</p> <p>Water quality Although there is not a direct link with the River Dee from the allocation, it does lie directly adjacent to River Dee and Bala Lake SAC, and therefore there is the potential for construction site run off. However, given the small-scale (1 ha), short-term nature of the construction works for any future redevelopment at the site, in conjunction with the requirement to comply with standard CIRA guidance and Policy STR13 within the LDP, no likely significant effects on the water quality of the adjacent SAC are anticipated alone or in combination.</p>	<p>No LSE alone or in combination</p>
<p>Rowley's Drive, Shotton Ref: PE2.30</p>	<p>Dee Estuary SAC/SPA/Ramsar site (2.9km) River Dee and Bala Lake SAC (371m) Deeside and Buckley Newt Sites SAC (1.2km)</p>	<p>4.88</p>	<p>Outline planning application on the northern compartment for car sales, commercial units and storage area. Application for units and car parking on the southern compartment refused.</p>	<p>Existing Industrial area, surrounded by existing development and adjacent to the railway line</p>	<p>None anticipated</p>	<p>No LSE alone or in combination</p>

Land North of Broughton Park	No impact pathways to European sites identified	3	Outline planning permission granted on appeal for medical centre, Council contact centre, Hotel, Public House / Restaurant and four class A3 food and drink units	Redevelopment of urban location within Broughton	None anticipated	No LSE alone or in combination
Land to the south of Chester Road	No impact pathways to European sites identified	0.7	No recent planning history	Redevelopment of urban location within Mold	None anticipated	No LSE alone or in combination
Policy PC12 – Community Facilities						
Community Centre, Woodlane Ref: PC12.1	No impact pathways to European sites identified	0.19	No recent planning history	New allocation boundary since UDP. The site comprises grassland and scrub. The allocation is surrounded by residential development and roads.	None anticipated	No LSE alone or in combination
Greenfield Cemetery Ref: PC12.2	Dee Estuary SAC/SPA/Ramsar site (1 km)	0.99	No recent planning history	New allocation boundary since UDP. The site comprises a grassland, scrub/ woodland. The allocation is surrounded by residential development, roads and the existing cemetery to the north and east. Woodland and farmland are to the west and south.	None anticipated	No LSE alone or in combination
Treuddyn Cemetery Ref: PC12.3	No impact pathways to European sites identified	0.29	No recent planning history	New allocation boundary since UDP. The site comprises a grassland field surrounded by residential development, roads and the existing cemetery.	None anticipated.	No LSE alone or in combination
Policy EN13 - Renewable and Low Carbon Energy Development						
Crumps Yard Solar Farm Ref: EN13.1	Dee Estuary SAC/SPA/Ramsar site (80 m)	3.4	No recent planning history	New allocation boundary changed since UDP. The site comprises scrub and grassland surrounded by existing development and railway.	None anticipated.	No LSE alone or in combination
Castle Park, Flint Ref: EN13.2	Dee Estuary SAC/SPA/Ramsar site (adjacent)		No recent planning history	New allocation boundary changed since UDP. The site comprises an area of scrub and grassland adjacent to the Estuary.	<p>Disturbance/ displacement of Dee Estuary SPA/ Ramsar site species</p> <p>The allocation is surrounded by woodland and scrub, screening the site from the nearby Estuary. The installation of a new solar farm at this location would not lead to significant disturbance/ displacement effects on the Dee Estuary SPA/ Ramsar site species alone or in combination.</p> <p>Although there may be some localised disturbance/ displacement to birds in the vicinity of the works (should they take place during the winter), it is considered that this is unlikely to have a significant effect on the qualifying species of the SPA/ Ramsar site alone or in combination</p> <p>Water quality</p> <p>Although there are no watercourses within this allocation which could link into a European site, the allocation lies adjacent to the Dee Estuary and drainage ditches (within Flint Marsh) flow into the Estuary, and therefore there is the potential for construction site run off. However, given the short-term</p>	No LSE alone or in combination

nature of solar farm construction, in conjunction with the requirement to comply with standard CIRA guidance and Policy STR13 within the LDP, no likely significant effects on the water quality of the adjacent SPA/ Ramsar site/SAC are anticipated alone or in combination.

Standard construction measures associated with development on landfill sites, will also be employed to protect the engineering cap on the existing landfill site and will therefore avoid likely significant effects associated with release of contaminants into the nearby Estuary.

NRW

Consultation with NRW has been carried out for this allocation. A project specific HRA is currently being produced which will provide further evidence to rule out likely significant effects associated with future development at this allocation.

Policy EN25 - Sustainable Minerals Development

Extension to Hendre Quarry (Limestone) Ref: EN25.1	Deeside and Buckley Newt Sites SAC (600m)	8.5ha	No recent planning history	New allocation boundary changed since UDP. The site comprises arable fields adjacent to the existing quarry site.	None anticipated	No LSE alone or in combination
Extension to Pant y Pwll Dwr Quarry (Limestone) Ref: EN25.2	Deeside and Buckley Newt Sites SAC (adjacent)	16.6ha	No recent planning history	New allocation boundary changed since UDP. The site comprises grassland and access route to existing quarry site.	None anticipated	No LSE alone or in combination
Extension to Ddol Uchaf Quarry (Sand and Gravel) Ref: EN25.3	No impact pathways to European sites identified	8.7ha	No recent planning history	New allocation boundary changed since UDP. The site comprises arable fields adjacent to the existing quarry site.	None anticipated	No LSE alone or in combination
Extension within Fron Haul Quarry (Sand and Gravel) Ref: EN25.4	No impact pathways to European sites identified	3ha	No recent planning history	New allocation boundary changed since UDP. The site comprises woodland and quarry tracks adjacent to the existing quarry site.	None anticipated	No LSE alone or in combination

6 In combination Effects (sites within the LDP)

6.1.1 The HRA needs to consider those elements of the LDP that may have a significant impact in combination either with other policies or sites within the LDP itself or with other plans and projects within the local area (or both). This Section looks at the potential in combination effects associated with allocations (and their associated policies) within the LDP itself. In combination effects associated with other plans or projects is set out within Section 7, below.

6.2 Policies and sites within the LDP

6.2.1 The policies set out within the Local Plan have been designed to work together (and should be read as such), there are no policies within the Local Plan which would act in combination with other policies with the Local Plan to have a likely significant effect on European sites either alone, or in combination.

6.2.2 The screening of the allocation sites set out within Table 20 identified the potential for in combination effects on the Dee Estuary SPA/ Ramsar site/ SAC in relation to an increase in recreational pressure on these European sites. All other potential in combination effects (within the Local Plan itself) have been screened out of further assessment.

Recreational pressure (Dee Estuary SPA/ Ramsar site)

6.2.3 The potential exists for a rise in visitor numbers to have a significant effect on the Dee Estuary SPA/Ramsar site as the housing and employment developments are progressively completed across Flintshire. The screening (refer to Table 20) identified six residential allocation sites within 3.5 km of the Dee Estuary. These are shown in Table 21. The table also shows the number of dwellings and the current planning status of each allocation site.

Table 21: New housing developments within 3.5 km of the Dee Estuary SPA/ Ramsar site/SAC

Allocation site	Number of Dwellings	Planning Status (Allocation (A) or Planning Permission Granted (PP))
Highmere Drive, Connah's Quay (Ref: HN1.3)	150	A
Northop Road, Flint (Ref: HN1.4)	170	A
Holywell Rd/Green Lane, Ewloe (Ref: HN1.7)	298	A
Ash Lane, Hawarden (Ref: HN1.8)	288	A
Warren Hall Mixed Use Development Site (Ref: STR3B)	300	A
Northern Gateway Mixed Use Development Site (Ref: STR3A)	1,300	PP
Number of allocations		6
Total number of dwellings		2,506

6.2.4 The LDP includes the delivery of 7,950 new homes across the plan period. Of these 2,506 (36%) are within 3.5 km of the Dee Estuary SPA/ Ramsar site/ SAC. The majority of these new homes will be delivered through the strategic sites at Warren Hill and the Northern Gateway (totalling 1,600 dwellings). These allocations have already gone through the planning system and have therefore

already had potential environmental impacts assessed through the planning application process (this did not identify recreational pressure as a potential impact on the Dee Estuary SPA/ Ramsar site/ SAC alone or in combination). For the remaining 906 new dwellings, these allocations are located in, or on the edge of urban areas with existing local amenities and recreational areas. Provision of public open space will be incorporated into all new housing developments (to comply with Policy EN1). This would further encourage residents to stay local, rather than travel to more distant European sites. Therefore, although the potential exists for an increase in visitors to the coast as the housing developments are progressively completed in Flintshire, it is not considered that there would be an increase which would be large enough such that it could have a significant effect on the European sites. This potential impact has therefore been **screened out** of further assessment.

6.3 Conclusion

- 6.3.1 The in-combination assessment of policies and allocations site within the LDP itself concludes that there are no likely significant in combination effects of implementing LDP.

7 In combination Effects (with other plans or projects)

7.1 Other Plans and Projects

- 7.1.1 In addition to in combination effects of sites within the LDP itself, there is the potential for effects to occur upon European sites in combination with other plans or projects.
- 7.1.2 Only the effects of other plans or projects which would not be likely to be significant alone, need to be included in the in-combination assessment. If the effects of other plans or projects will already be significant on their own, they are not added to those associated with the LDP as they already have their own measures in place to mitigate for those effects.
- 7.1.3 Table 11 below shows the plans and project reviewed for the in-combination assessment. NSIPs fall within Category C in accordance with DTA Publications Limited Handbook (Tyldesley D. and Chapman, C (2013) The Habitats Regulations Assessment Handbook (accessed July 2019) edition UK DTA Publications Limited www.dtapublications.co.uk). Separate project-level HRAs will be carried out for these projects, and appropriate mitigation and compensation will be put in place to off-set any potential impacts on European sites. Given that these projects would already be significant on their own, they will not be considered further in the in-combination assessment.

Table 22: Other Plans and Projects included within the in-combination assessment

Authority	Relevant Plan/ Project
Denbighshire	Denbighshire Local Plan (adopted in 2013)
Wrexham	Replacement Local Plan currently in preparation
Cheshire West and Chester	Local Plan Part One and Two (currently at Examination stage)
Wirral	Replacement Local Plan currently in preparation
Environment Agency	Dee River Basin District Flood Risk Management Plan 2015 – 2021
Flintshire County Council	Flintshire Local Flood Risk Management Strategy

- 7.1.4 To be relevant to the in-combination assessment, the residual effects of other plans or projects will need to be sufficient either to make the unlikely effects of the Local Plan likely, or insignificant effects of the plan significant, or both. An assessment has therefore been made of the other plans with a view to determining whether or not they would result in impacts which, in combination with the policies set out in the Local Plan, could have likely significant effects on European sites. This includes an assessment of whether any of the sites near the boundary of Flintshire would have any significant in combination effects with individual sites on the boundary of neighbouring boroughs.

- 7.1.5 A number of the local plans (as detailed in the following paragraphs), are currently being produced, under review, or are being updated. As it is not possible to review all of the information about these emerging Local Plans, the in-combination assessment will instead look at the information currently available in the public domain. Where recent Plan-level HRAs have been undertaken and are in the public domain (for example the emerging Denbighshire and Wrexham Local Plans) the HRA assessments (and associated documentation) have been reviewed as part of the in-combination assessment.
- 7.1.6 The in-combination assessment with all of the relevant plans (whether based on new or soon-to-be-replaced plans, as appropriate) is presented in the following paragraphs.

Denbighshire Local Plan

- 7.1.7 Denbighshire borders Flintshire to the west. The Denbighshire Local Plan (Denbighshire County Council, 2013) was adopted in 2013. A recent Review Report of the Local Plan highlighted the need for a replacement plan; however, there are no freely available details for the new plan, and as such, the existing adopted plan will be used in this in combination assessment. From information available online (including the Local Plan, proposals maps and conclusions of the Local Plan Examination) all of the new developments within Denbighshire are located adjacent to existing development and major roads. There are no allocation sites which would be at the boundary of the both districts, therefore, no significant in combination effects in respect of concurrent development at the border would occur. The HRA of the Local Plan concluded that *'an Appropriate Assessment is not required. It can therefore be concluded that no significant effects upon the integrity of the European sites within the county or in adjacent areas are likely to occur (either alone or in combination with other plans or projects) as a result of implementing the Plan'*. No residual effects were identified in the HRA and therefore there would be no in combination effects with the Flintshire Local Plan.

Wrexham Local Plan

- 7.1.8 Wrexham is located to the south of Flintshire. Wrexham County Borough Council is preparing the Local Development Plan (LDP) which will replace the current adopted Unitary Development Plan. From the information currently available online (including the draft LDP and HRA (Wrexham County Borough Council, 2017), new development within Wrexham will be focused on existing settlements within the borough. There are also no allocation sites which would be at the boundary of the both Flintshire and Wrexham, therefore, no significant in-combination effects in respect of concurrent development at the border would occur. The HRA of the Deposit Plan concluded that with mitigation in place, no residual effects were identified in the HRA and therefore there would be no in combination effects with the Flintshire Local Plan.

Cheshire West and Chester Local Plan

- 7.1.9 Cheshire West and Chester is located to the southeast of Flintshire. The Council has two Local Plans (Local Plan (Part One) Strategic Policies, adopted January 2015 and Local Plan (Part Two) Land Allocations and Detailed Policies (currently at Examination stage)). From the information currently available online (including the Local Plans, interactive mapping and HRAs (Cheshire West and Chester, accessed 2018) new development will be concentrated around Chester and existing urban areas within the district. There are no allocation sites which would be at the boundary of the both districts, therefore, there would be no significant in combination effects in respect of concurrent development at the border. The HRA of the Part One Local Plan concluded that *'the Cheshire West & Chester Local Plan comprises a sufficient a sufficient policy framework to enable the subsequent delivery of necessary measures that would avoid or adequately mitigate adverse effects on internationally designated sites and thus enable a conclusion of no adverse effect on integrity.'* The HRA of the Part Two Local Plan includes *'at a strategic level the measures that have been introduced are extensive changes to wording of individual policies to incorporate explicit protection of European sites, participation in the development of a visitor management strategy for the European sites around the Liverpool City Region in conjunction with those authorities and engagement with waste water infrastructure providers to confirm that they do not have significant concerns with the deliverability of the Local Plan (Part Two).'* Policy wording has also been incorporated into the plan to ensure no

adverse effect on European sites. With these measures in place, no residual effects were identified and therefore there would be no in combination effects with the Flintshire Local Plan.

Wirral Local Plan

- 7.1.10 Wirral is located to the northeast of Flintshire, across the Dee Estuary. The Council has two existing Local Plans (the Unitary Development Plan, February 2000 and the Joint Waste Local Plan for Merseyside and Halton, July 2013). The strategic policies in the Unitary Development Plan will be replaced by a new Core Strategy Local Plan (currently at the Development Options Review stage). From information currently available online for the emerging Core Strategy (including Policy Maps (Wirral Council, accessed 2018)), the large majority of the new housing and employment allocations are located to the northeast of the borough around Birkenhead and Bebington to the east of the M53 (more than 15 km from any proposed allocations within Flintshire), and are unlikely to have in combination effects with Flintshire Local Plan.

Dee River Basin Flood Risk Management Strategy and Flintshire Local Flood Risk Management Strategy

- 7.1.11 The Dee River Basin Flood Risk Management Strategy (Natural Resources Wales/ Environment Agency, 2016), and Flintshire Local Flood Risk Management Strategy (Flintshire County Council, 2013) set out how flood risk will be managed in the area. However, there are no elements of the Flood Risk Management Strategies which would act in combination with the Local Plan, and therefore has been screened out of the in-combination assessment.

7.2 Conclusion

- 7.2.1 The review of adjacent Local Plan information Local Plan Review information showed that there was no potential for in-combination effects between Flintshire and the neighbouring Local Plans. Therefore, potential in combination effects with other plans/ projects can be screened out of further assessment.

8 Overall Conclusion

- 8.1.1 This HRA Screening of the Flintshire Local Development Plan has considered the potential implications of the Plan for the European sites in the vicinity of the borough.
- 8.1.2 The Screening exercise concluded that none of the policies or associated allocation sites were considered to have a likely significant effect on any of the European sites alone, or in combination.

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APPENDIX A

European Sites

Site Name	Qualifying Features	Pressures/ threats
Dee Estuary SPA	<p>This site qualifies under Article 4.1 of the Directive (79/409/EEC) by supporting populations of European importance of the following species listed on Annex I of the Directive:</p> <p>During the breeding season;</p> <p>Common Tern <i>Sterna hirundo</i> Little Tern <i>Sterna albifrons</i></p> <p>On passage;</p> <p>Sandwich Tern <i>Sterna sandvicensis</i></p> <p>Over winter;</p> <p>Bar-tailed Godwit <i>Limosa lapponica</i></p> <p>This site also qualifies under Article 4.2 of the Directive (79/409/EEC) by supporting populations of European importance of the following migratory species:</p> <p>On passage;</p> <p>Redshank <i>Tringa totanus</i></p> <p>Over winter;</p> <p>Black-tailed Godwit <i>Limosa limosa islandica</i> Curlew <i>Numenius arquata</i> Dunlin <i>Calidris alpina alpina</i> Grey Plover <i>Pluvialis squatarola</i> Knot <i>Calidris canutus</i> Oystercatcher <i>Haematopus ostralegus</i> Pintail <i>Anas acuta</i> Redshank <i>Tringa totanus</i> Shelduck <i>Tadorna tadorna</i> Teal <i>Anas crecca</i></p> <p>Assemblage qualification: A wetland of international importance.</p>	<p>Public Access/ Disturbance; Changes in species distributions; Invasive species; Climate change; Coastal squeeze; Inappropriate scrub control; Water pollution; Fisheries: Commercial marine and estuarine; Inappropriate coastal management; Overgrazing; Direct impact from a third party; Marine litter; Predation; Planning permission: general; Marine consents and permits; Wildfire/ arson; Air pollution: impact of atmospheric nitrogen deposition; Transportation and service corridors; and Physical modification</p>

Site Name	Qualifying Features	Pressures/ threats
	<p>The area qualifies under Article 4.2 of the Directive (79/409/EEC) by regularly supporting at least 20,000 waterfowl</p> <p>Over winter, the area regularly supports 130,408 individual waterfowl (5 year peak mean 1991/2 - 1995/6) including: Black-tailed Godwit <i>Limosa limosa islandica</i>, Shelduck <i>Tadorna tadorna</i>, Teal <i>Anas crecca</i>, Pintail <i>Anas acuta</i>, Oystercatcher <i>Haematopus ostralegus</i>, Grey Plover <i>Pluvialis squatarola</i>, Bar-tailed Godwit <i>Limosa lapponica</i>, Dunlin <i>Calidris alpina alpina</i>, Sanderling <i>Calidris alba</i>, Curlew <i>Numenius arquata</i>, Redshank <i>Tringa totanus</i>, Cormorant <i>Phalacrocorax carbo</i>, Wigeon <i>Anas penelope</i>, Mallard <i>Anas platyrhynchos</i>, Lapwing <i>Vanellus vanellus</i>, Knot <i>Calidris canutus</i>.</p>	
Dee Estuary SAC	<p>Annex I habitats that are a primary reason for selection of this site:</p> <p>1140 Mudflats and sandflats not covered by seawater at low tide 1310 Salicornia and other annuals colonizing mud and sand 1330 Atlantic salt meadows (<i>Glauco-Puccinellietalia maritima</i>)</p> <p>Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site:</p> <p>1130 Estuaries 1210 Annual vegetation of drift lines 1230 Vegetated sea cliffs of the Atlantic and Baltic Coasts 2110 Embryonic shifting dunes 2120 "Shifting dunes along the shoreline with <i>Ammophila arenaria</i> ("white dunes")" 2130 "Fixed coastal dunes with herbaceous vegetation ("grey dunes")" 2190 Humid dune slacks</p> <p>Annex II species that are a primary reason for selection of this site:</p> <p>Not applicable</p> <p>Annex II species present as a qualifying feature, but not a primary reason for site selection:</p> <p>1095 Sea lamprey <i>Petromyzon marinus</i> 1099 River lamprey <i>Lampetra fluviatilis</i></p>	As above.

Site Name	Qualifying Features	Pressures/ threats
Dee Estuary Ramsar site	<p>1395 Petalwort <i>Petalophyllum ralfsii</i></p> <p>Ramsar criterion 1:</p> <p>Extensive intertidal mud and sand flats (20 km by 9 km) with large expanses of saltmarsh towards the head of the estuary. Habitats Directive Annex I features present on the pSAC include:</p> <p>H1130 Estuaries H1140 Mudflats and sandflats not covered by seawater at low tide H1210 Annual vegetation of drift lines H1230 Vegetated sea cliffs of the Atlantic and Baltic coasts H1310 <i>Salicornia</i> and other annuals colonising mud and sand H1330 Atlantic salt meadows (<i>Glauco-Puccinellietalia maritimae</i>) H2110 Embryonic shifting dunes H2120 Shifting dunes along the shoreline with <i>Ammophila arenaria</i> (“white dunes”) H2130 Fixed dunes with herbaceous vegetation (“grey dunes”) H2190 Humid dune slacks</p> <p>Ramsar criterion 2:</p> <p>It supports breeding colonies of the vulnerable Natterjack Toad, <i>Epidalea calamita</i></p> <p>Ramsar criterion 5:</p> <p>Assemblages of international importance:</p> <p>Species with peak counts in winter:</p> <p>Non-breeding season regularly supports 120,726 individual waterbirds (5 year peak mean 1994/5 – 1998/9).</p> <p>Ramsar criterion 6:</p> <p>Species/populations occurring at levels of international importance.</p> <p>Qualifying Species/populations (as identified at designation):</p> <p>Species with peak counts in spring/autumn:</p> <p>Redshank, <i>Tringa totanus</i>,</p> <p>Species with peak counts in winter:</p>	Refer to SPA/ SAC.

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	<p>Teal, <i>Anas crecca</i>, NW Europe Shelduck, <i>Tadorna tadorna</i>, NW Europe Oystercatcher, <i>Haematopus ostralegus</i>, Europe & W Africa Curlew, <i>Numenius arquata</i> Europe/NW Africa Pintail, <i>Anas acuta</i>, NW Europe Grey plover, <i>Pluvialis squatarola</i>, E Atlantic Knot, <i>Calidris canutus islandica</i>, W Europe/ Canada Dunlin, <i>Calidris alpina alpina</i> Europe (breeding) Black-tailed godwit, <i>Limosa limosa islandica</i>, Iceland (breeding) Bar-tailed godwit, <i>Limosa lapponica</i>, W European (wintering) Redshank, <i>Tringa totanus</i>, Eastern Atlantic</p> <p>Contemporary data and information on waterbird trends at this site and their regional (sub-national) and national contexts can be found in the Wetland Bird Survey report, which is updated annually. See www.bto.org/survey/webs/webs-alerts-index.htm.</p> <p>Details of bird species occurring at levels of National importance are given in Section 22.</p>	
River Dee and Bala Lake SAC	<p>Annex I habitats that are a primary reason for selection of this site:</p> <p>3260 Water courses of plain to montane levels with the Ranunculion fluitantis and Callitriche-Batrachion vegetation</p> <p>Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site:</p> <p>Not applicable</p> <p>Annex II species that are a primary reason for selection of this site:</p> <p>Atlantic salmon <i>Salmo salar</i> 1831 Floating water-plantain <i>Luronium natans</i></p> <p>Annex II species present as a qualifying feature, but not a primary reason for site selection:</p> <p>1095 Sea lamprey <i>Petromyzon marinus</i> 1096 Brook lamprey <i>Lampetra planeri</i> 1099 River lamprey <i>Lampetra fluviatilis</i> 1163 Bullhead <i>Cottus gobio</i></p>	<p>Pollution incidents arising from industrial and agricultural activity; Tourism; Fishing; Blue-green algal blooms, related to phosphate enrichment from the surrounding catchment; Alien/ introduced species; and water quality.</p>

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Deeside and Buckley Newt SAC	<p>1355 Otter <i>Lutra lutra</i></p> <p>Annex I habitats that are a primary reason for selection of this site: Not applicable</p> <p>Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site: 91A0 Old sessile oak woods with <i>Ilex</i> and <i>Blechnum</i> in the British Isles</p> <p>Annex II species that are a primary reason for selection of this site: 1166 Great crested newt <i>Triturus cristatus</i></p> <p>Annex II species present as a qualifying feature, but not a primary reason for site selection: Not applicable</p>	<p>Loss of habitat due to agricultural intensification; pond senescence; and urban expansion; Non-native, invasive species; Recreational pressures (main pressures are fishing and off-roading); Predation; Barriers to movement; and Development.</p>

APPENDIX B

Figures

Figure 1: Designated sites

APPENDIX C

Information from NE - Buffer distances in relation to European sites

Bird Group	Birds	Extent of Functional Habitat from site	Note
Birds 1	All breeding bird assemblages (excluding ground- nesting heathland species, stone-curlew, marsh harrier & nightjar)	500m	Breeding SSSI birds of prey (peregrine, merlin, hen harrier & honey buzzard) can also forage up to 4km. It is not thought likely, however, that these species would make significant use of farmland habitat beyond semi-natural areas encompassed by protected site boundaries.
Birds 2	All wintering birds (except wintering waders and grazing wildfowl; wigeon and geese) ^{1,2}	500m	Home ranges of dabbling ducks such as teal, mallard and gadwall could extend beyond site boundaries at coastal sites, but less likely to do so at inland water bodies. Where functional habitat of dabbling ducks does extend beyond site boundaries then this is likely to be accommodated by presence of wigeon, geese or waders. Wintering marsh harrier and hen harrier can forage 10s of km and are likely to make significant use of farmland habitat beyond semi-natural areas encompassed by site boundaries. Owing to extensive presence of farmland within 10s of km and low densities of birds, the standard distance of 500m relating to all wintering birds is deemed acceptable.
Birds 3	Wintering waders (except golden plover and lapwing), brent goose & wigeon ^{1,3} marsh harrier ^{4,5}	2km	Breeding marsh harrier can also forage up to 4km and are likely to make significant use of farmland habitat beyond semi-natural areas encompassed by site boundaries. Owing to extensive presence of farmland and low densities of birds, a reduced distance of 2km is deemed acceptable.
Birds 4	Ground nesting heathland species, breeding nightjar & stone curlew	2km	Many sites (e.g. TBH/ Dorset Heaths) have issues of recreational disturbance. Buffers need to take into account travel to sites from proposed residential developments. Nightjar - up to 4km foraging distance for nightjars but unlikely to be >2km beyond site boundary. Likely to need site specific assessment as depending on adjacent land use there may be extensive or no functional habitat beyond the site boundary e.g. discrete heathland SSSI amongst grassland and woodland in comparison to discrete heathland site surrounded by development
Birds 5	Wintering lapwing and golden plover	15-20km	Golden plover can forage up to 15km from a roost site within a protected site. Lapwing can also forage similar distances. Both species use lowland farmland in winter, so difficult to distinguish between European populations and those present within the wider environment unconnected to a European site. Reduced sensitivity beyond 10km
Birds 6	Wintering white-fronted goose, greylag goose, Bewick's swan, whooper swan & wintering bean goose.	10km	No information
Birds 7	Wintering pink-footed goose, barnacle goose	15-20km	No information

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