Habitats Regulations Assessment of the Seafront Masterplan (Supplementary Planning Document)

Screening Statement

April 2013
Habitats Regulations Assessment of the Seafront Masterplan (Supplementary Planning Document)

Screening statement

This screening statement has been prepared to assess the proposals in the Seafront Masterplan against the Habitats Regulations.

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Executive Summary

Following the adoption of the Seafront Strategy and the Portsmouth Plan, the city council is preparing the Seafront Masterplan, which will set out a comprehensive framework for the future development of the Seafront.

Habitats Regulations Assessment (HRA) is a requirement of the Conservation of Habitats and Species Regulations 2010 ('the Habitats Regulations'). This HRA focuses on the likely significant effects of the Seafront Masterplan on the nature conservation interests of European protected nature conservation sites in and around Portsmouth and seeks to establish whether or not there will be any adverse effects on the ecological integrity of these European sites as a result of the proposals.

This screening statement addresses the earliest stages of HRA. It documents the initial evidence gathering process and states whether or not a full Appropriate Assessment is required for the masterplan. A draft HRA was completed and consulted on alongside the draft Seafront Masterplan. The results of that consultation have informed this revised screening statement.

Findings

Each of the proposals in the seafront masterplan has been assessed to determine whether there could be an adverse effect on a European site if it went ahead. The proposals for Clarence Pier, gateways to Southsea Common, the lighting proposals at Avenue de Caen, the Watersports Hub and the beach huts at Eastney could potentially lead to such an impact as a result of disturbance from recreation and/or indirect habitat loss.

As a result, the nature of these potential impacts was assessed and initial avoidance and mitigation measures were explored and incorporated into the seafront masterplan. It is considered that if these measures are implemented, they would remove the potential for adverse effects on the European sites.

Screening statement

It is the city council's view that the plan is not likely to lead to an adverse effect on any European sites. Consequently, an appropriate assessment is not required and the Seafront Masterplan can be adopted as a Supplementary Planning Document.
1. Introduction

**Background**

1.1 Portsmouth City Council is undertaking a Habitats Regulations Assessment (HRA) of the Seafront Masterplan Supplementary Planning Document (SPD). The application of HRA to land use plans is a requirement of the Conservation of Habitats and Species Regulations 2010 (the Habitats Regulations), the UK’s transposition of European Union Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (the Habitats Directive). HRA must be applied to all local planning policy documents in England and Wales and aims to assess the potential effects of a land use plan against the conservation objectives of any sites designated for their nature conservation importance as part of a system known collectively as the Natura 2000 network of European sites.

1.2 European sites provide ecological infrastructure for the protection of rare, endangered or vulnerable natural habitats and species of exceptional importance within the European Union. These sites consist of Special Areas of Conservation ((SACs), designated under the Habitats Directive) and Special Protection Areas ((SPAs), designated under European Union Directive 2009/147/EC on the conservation of wild birds (the Birds Directive)). Meanwhile, Government policy (The National Planning Policy Framework (CLG, 2012), section 118 and Circular 06/05 (ODPM, 2005)) recommends that Ramsar sites (designated under the Convention on Wetlands of International Importance (UNESCO, 1971), are treated as if they are fully designated European sites for the purposes of considering development proposals that may affect them.

1.3 Under regulation 102 of the Habitats Regulations, the assessment must determine whether or not a plan will adversely affect the ecological integrity of the European site(s) concerned. Where negative effects are identified, the process should consider alternatives to the proposed actions and explore mitigation opportunities, whilst adhering to the precautionary principle.

1.4 The European Commission (2000) describes the principle as follows:

   "If a preliminary scientific evaluation shows that there are reasonable grounds for concern that a particular activity might lead to damaging effects on the environment, or on human, animal or plant health, which would be inconsistent with the protection normally afforded to these within the European Community, the Precautionary Principle is triggered."

1.5 Decision-makers then have to determine what action to take. They should take account of the potential consequences of taking no action, the uncertainties inherent in the scientific evaluation, and they should consult interested parties on the possible ways of managing the risk. Measures should be proportionate to the level of risk and to the desired level of protection. They should be provisional in nature pending the availability of more reliable scientific data.
1.6 Action is then undertaken to obtain further information enabling a more objective assessment of the risk. The measures taken to manage the risk should be maintained so long as the scientific information remains inconclusive and the risk unacceptable. The hierarchy of intervention is important: where effects on ecological integrity are identified, plan makers must first consider alternative ways of achieving the plan’s objectives that avoids significant effects entirely. Where it is not possible to meet objectives through other means, mitigation measures that allow the plan to proceed by removing or reducing significant effects may be considered. If it is impossible to avoid or mitigate the adverse effect, the plan-makers must demonstrate, under the conditions of regulation 103 of the Habitats Regulations, that there are Imperative Reasons of Overriding Public Interest (IROPI) to continue with the proposal. This is widely perceived as an undesirable position and should be avoided if at all possible.

Purpose of this report

1.7 This report addresses the earliest stages of HRA. It documents the initial evidence gathering process and states whether or not an Appropriate Assessment will be required for the SPD. The report shows that there are twelve European sites in the vicinity of the City (see section 3) that need to be considered due to their specific environmental sensitivities.

1.8 The Seafront Masterplan SPD hangs off of policy PCS9 (the Seafront) of the Portsmouth Plan. The Portsmouth Plan, including the proposals for the seafront, was itself subject to HRA (UE Associates, 2011). This concluded that the proposals in the seafront policy could have an adverse effect on Chichester Harbour SPA and Ramsar sites together with Portsmouth Harbour SPA and Ramsar sites due to the displacement effect on identified Brent goose feeding sites and high tide wader roost sites along the seafront. The assessment concluded that:

“the Council views the Seafront as the City’s most significant and versatile green infrastructure asset, with the potential to draw visitors from across the City and sub-region thereby reducing recreational activity close to more sensitive designated areas. It is considered recreational use of the Seafront, if sensitively managed (see section 10.7 below), can continue to meet the needs of a growing population while also offering important supporting habitats to the harbours’ birds, the majority of which are winter visitors.” (Section 10.4.1 of UE Associates, 2011)

1.9 The assessment concluded that all effects associated with the proposals at the Seafront could be satisfactorily avoided and reduced without residual impacts.

1.10 The SPD is itself being subject to further assessment as it contains details which were not part of the original seafront policy and thus have not been subject to assessment under the Habitats Regulations. The contents of the report include information in relation to:

- The HRA process
- The Seafront Masterplan SPD
- The HRA methodology
- Evidence gathering in relation to the European sites
- The potential effects of the SPD
- A screening statement as to the need, or otherwise, for appropriate assessment
- The next stages in the process
Background to the Plan
1.11 The masterplan is intended to guide improvements to the seafront area of the city. It contains proposals that respond to the overarching vision and aims of the Seafront Strategy and provides further detailed guidance about how policy PCS 9 (the seafront) of the Portsmouth Plan will be implemented.

1.12 The plan seeks to:
\- set out the background and context for development opportunities
\- articulate a clear identity/role for each of the Seafront’s six unique character areas
\- establish a high quality baseline for proposals including design principles, potential mix of uses and guidance for buildings and public spaces.

1.13 Table 1 summarises the development which is being proposed by the SPD. The table only includes those sites where new residential, retail or leisure development is proposed. It does not include the large number of sites where improvements to existing public routes and areas are proposed.

1.14 Figure A shows the extent of the Seafront Masterplan SPD. The SPD area lies immediately adjacent to the Chichester and Langstone Harbours SPA and Ramsar sites at its eastern extent. The Solent Maritime SAC extends further southwards and abuts the SPD from the harbor mouth as far as its western edge. Portsmouth Harbour lies 1,100m north-west of the SPD area.
### Table 1: Summary of development opportunities

<table>
<thead>
<tr>
<th>No.</th>
<th>Opportunity site</th>
<th>Preferred development option</th>
<th>Existing storey height</th>
<th>Potential storey height</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Old Portsmouth</td>
<td>Conversion of arches to a café, art gallery and cycle hire shop.</td>
<td>n/a</td>
<td>n/a</td>
</tr>
<tr>
<td>2a</td>
<td>Clarence Pier</td>
<td>Design option A. Comprehensive redevelopment including a new hotel, leisure uses and transport terminal.</td>
<td>1 - 3</td>
<td>Not specified</td>
</tr>
<tr>
<td>2b</td>
<td>Clarence Pier</td>
<td>Design option B. Re-use or redevelopment of existing buildings, a new hotel, separate transport interchange building and new pedestrianized plaza together with enlarged hoverpad and hover freight building.</td>
<td>1-3</td>
<td>Not specified</td>
</tr>
<tr>
<td>3</td>
<td>Mozzarella Joes</td>
<td>Redevelopment of the building and extension of timber decks.</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>4</td>
<td>Blue Reef Aquarium</td>
<td>Redevelopment of the building with extended frontage.</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>5</td>
<td>Southsea Common gateways</td>
<td>New tree planting at the gateways to the Common</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>6</td>
<td>Former visitors information building</td>
<td>Redevelopment of the building into a café.</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>7</td>
<td>Avenue de Caen route</td>
<td>New bold lighting at the junction with Clarence Esplanade.</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>8</td>
<td>New sports hub, Avenue de Caen</td>
<td>New sports facility.</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>9</td>
<td>Pyramids Centre</td>
<td>New lighting.</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>10</td>
<td>Speaker’s corner</td>
<td>New café hub.</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>11</td>
<td>South Parade Pier</td>
<td>Redevelopment with new restaurant and leisure on the pier head.</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>12</td>
<td>South Parade promenade café</td>
<td>Redevelopment into new café.</td>
<td>0</td>
<td>1</td>
</tr>
<tr>
<td>13</td>
<td>Canoe Lake Park café/restaurant hub</td>
<td>Redevelopment opportunities.</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>14</td>
<td>Water sports hub and eco-café</td>
<td>Development of new watersports facility and café.</td>
<td>0</td>
<td>2</td>
</tr>
<tr>
<td>15</td>
<td>Beach huts at Eastney</td>
<td>Development of new beach huts on Eastney Beach.</td>
<td>0</td>
<td>1</td>
</tr>
</tbody>
</table>
Figure A: area covered by the Seafront Masterplan SPD

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2. Methodology

**Introduction**

2.1 Guidance on HRA has been published in draft form by the Government (CLG, 2006). This draws on advice from a range of experts as well as European Union guidance (European Commission, 2001) regarding methodology for appropriate assessment of plans.

2.2 The guidance recognises that there is no statutory method for undertaking HRA and that the adopted method must be appropriate to its purpose under the Habitats Directive and Regulations; this concept is one of the reasons why HRA is also often referred to as appropriate assessment. The guidance identifies three stages to the HRA process:

- AA1: likely significant effects (screening)
- AA2: appropriate assessment and ascertaining the effect on integrity
- AA3: mitigation measures and alternative solutions

2.3 Where stage AA3 cannot produce alternative solutions or mitigation to remove or reduce adverse effects to insignificant levels, there may be a need to explore imperative reasons of overriding public interest (IROPI). This is discouraged by CLG. The three stages collectively make up the HRA, while stage AA2 is the point at which appropriate assessment of the plan is carried out if the evidence points to a need for such an assessment. Natural England has produced more prescriptive draft guidance on the assessment on Regional Spatial Strategies and sub-regional strategies (David Tyldesley Associates, 2006) under the provisions of the Habitats Regulations. This introduces the concept of a stepped approach to the assessment process and fits within the framework of the three stages identified by CLG.

2.4 Table 2 illustrates how the two approaches can be operated as one integrated methodology to achieve the same outcome from each approach. It is recognised that HRA may be undertaken at the same time as other assessment processes associated with the preparation of development documents (ie, Sustainability Appraisal and Strategic Environmental Assessment (SA/SEA)), but should be recorded as a distinct procedure with its own legislative requirements.
Methodology

2.5 The screening exercise follows the methodology prepared by David Tyldesley and Associates (draft, 2006), as described in Table 2.

<table>
<thead>
<tr>
<th>CLG stage</th>
<th>Natural England (Tyldesley) steps</th>
</tr>
</thead>
<tbody>
<tr>
<td>AA1: likely significant effects</td>
<td>1. Identify all international sites in and around the area.</td>
</tr>
<tr>
<td></td>
<td>2. Acquire, examine and understand conservation objectives of each interest feature of each European site potentially affected.</td>
</tr>
<tr>
<td></td>
<td>3. Consider the policies and proposals in the plan and the changes that they may cause that may be relevant to the European sites. This is likely to involve estimating likely magnitude, duration, location and extent of effects of the changes as far as they may reasonably be predicted at this stage.</td>
</tr>
<tr>
<td></td>
<td>4. Acknowledging the plan is not necessary for site management, would any elements of the plan be likely to have a significant effect on any interest feature, alone or in combination with other projects or plans, directly or indirectly?</td>
</tr>
<tr>
<td></td>
<td>5. Seek official screening statement from Natural England</td>
</tr>
<tr>
<td>AA2: Appropriate assessment and ascertaining the effect on integrity.</td>
<td>6. Agree scope and method of the appropriate assessment and consultation period with Natural England.</td>
</tr>
<tr>
<td></td>
<td>7. Undertake an appropriate assessment of the implications for each affected site in light of its conservation objectives, using the best information, science and technical know-how available.</td>
</tr>
<tr>
<td>AA3: Mitigation measures and alternative solutions.</td>
<td>8. Consider whether any possible adverse effect on integrity of any site could be avoided by changes to the plan, such as an alternative policy or proposal whilst still achieving its aims and objectives.</td>
</tr>
<tr>
<td></td>
<td>9. Draft a report on the Appropriate Assessment and consult Natural England and, if necessary, the public.</td>
</tr>
<tr>
<td></td>
<td>10. Taking account of Natural England and public representations, can it be ascertained that the plan will not adversely affect integrity of any international site?</td>
</tr>
</tbody>
</table>

2.6 A draft HRA screening statement was prepared and consulted on as part of the consultation on the draft SPD. Two responses (from Natural England and the RSPB) were received which commented on the HRA. These highlighted a number of possible impacts from the proposals on the ecological integrity of European sites.

2.7 As a result of these consultation responses, these potential impacts are included and assessed in more detail in the sections which follow in order to robustly ensure that all possible impacts on European sites are eliminated.
3. European Sites

Scope of the study

3.1 Each European site has its own intrinsic qualities, besides the habitats or species for which it was designated, that enable the site to support the ecosystems that it does. An important aspect of this is that the ecological integrity of each site can be vulnerable to change from natural and human induced activities in the surrounding environment. For example, sites can be affected by land use plans in a number of different ways, including the direct land-take of new development, the type of use the land will be put to (for example, a noise emitting use), the pollution a development generates and the resources it uses (during both construction and operation).

3.2 One intrinsic quality of any European site is its functionality at the landscape ecology level; in other words, how the site interacts with the zone of influence of its immediate surroundings, as well as the wider area. Best practice guidance on Habitats Regulations Assessment suggests that all European sites within the area of coverage of a plan, together with all those within a 10km buffer zone should be considered in the first instance as potential receptors for negative effects. In addition to these, other European sites further than 10km from the area of coverage of a plan may also be affected due to their specific environmental sensitivities and the activities proposed within the plan. This is particularly the case where there is potential for developments resulting from the plan to generate water-borne pollutants, where there are particularly high demands for water resources, or a specific recreational resource has a catchment area of greater than 10km.

3.3 Table 3 lists twelve European sites considered within the scope of the assessment, while Figure B depicts those close to the plan area.

<table>
<thead>
<tr>
<th>Name</th>
<th>Location</th>
<th>Type</th>
</tr>
</thead>
<tbody>
<tr>
<td>Solent and Isle of Wight lagoons</td>
<td>Within 10km buffer zone</td>
<td>SAC</td>
</tr>
<tr>
<td>Solent Maritime</td>
<td>Within 10km buffer zone</td>
<td>SAC</td>
</tr>
<tr>
<td>South Wight Maritime</td>
<td>Within 10km buffer zone</td>
<td>SAC</td>
</tr>
<tr>
<td>The New Forest</td>
<td>C. 20km to the west (straight line)</td>
<td>SAC</td>
</tr>
<tr>
<td>Chichester and Langstone Harbours</td>
<td>Within 10km buffer zone</td>
<td>SPA</td>
</tr>
<tr>
<td>Portsmouth Harbour</td>
<td>Within 10km buffer zone</td>
<td>SPA</td>
</tr>
<tr>
<td>Solent and Southampton Water</td>
<td>Within 10km buffer zone</td>
<td>SPA</td>
</tr>
<tr>
<td>The New Forest</td>
<td>C. 20km to the west (straight line)</td>
<td>SPA</td>
</tr>
<tr>
<td>Chichester and Langstone Harbours</td>
<td>Within 10km buffer zone</td>
<td>Ramsar</td>
</tr>
<tr>
<td>Portsmouth Harbour</td>
<td>Within 10km buffer zone</td>
<td>Ramsar</td>
</tr>
<tr>
<td>Solent and Southampton Water</td>
<td>Within 10km buffer zone</td>
<td>Ramsar</td>
</tr>
<tr>
<td>The New Forest</td>
<td>C. 20km to the west (straight line)</td>
<td>Ramsar</td>
</tr>
</tbody>
</table>
Figure B: European sites in the vicinity of Portsmouth

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Site descriptions

3.4 An ecological description of each European site is given in Appendix II of the Portsmouth Plan's HRA (UE Associates, 2011).

Qualifying features

3.5 The qualifying features of each site (that is, the reasons for which the sites were designated) are listed in Appendix III of the Portsmouth Plan's HRA (UE Associates, 2011). To summarise, the species and habitats protected under the group of designations are as follows. Species (as protected by the designation of SPA and Ramsar):

- Bar-tailed Godwit *Limosa lapponica*
- Black-tailed Godwit *Limosa limosa islandica*
- Common Shelduck *Tadorna tadoma*
- Common Tern *Sterna hirundo*
- Dark-bellied Brent goose *Branta bernicla bernicla*
- Dartford Warbler *Sylvia undata*
- Hen Harrier *Cicus cyaneus*
- Honey Buzzard *Pernis apivorus*
- Little Tern *Sterna albifrons*
- Little Egret *Egretta garzetta*
- Dunlin *Calidris alpine alpine*
- Grey Plover *Pluvialis squarola*
- Mediterranean Gull *Larus melanocephalus*
- Nightjar *Caprimulgus europaeus*
- Red-breasted Merganser *Mergus serrator*
- Redshank *Tringa tetanus*
- Rosetta Tern *Sterna sandvicensis*
- Sandwich Tern *Sterna dougallii*
- Teal *Anas crecca*
- Woodlark *Lullula arborea*

3.6 Habitats and species (as protected by the designation of SAC and Ramsar):

- Coastal lagoons
- Estuaries
- Spartina swards *Spartinion maritimae*
- Atlantic salt meadows *Glauco-Puccinellietalia maritimae*
- Sandbanks – slightly covered by sea water at all time
- Mudflats and sandflats – not submerged at low tide
- Annual vegetation drift lines
- Perennial vegetation – stony banks
- Reefs
- Salt tolerant plants *Salicornia* and other annuals colonising mud and sand
- Shifting white dunes with *Ammophila arenaria*
- Desmoulin’s whorl snail *Vertigo moulinsiana*
- Brook lamprey *Lampetra planeri*
- Bullhead *Cottus gobio*
- Southern damselfly *Coenagrion mercurial*
- Stag beetle *Lucanus cervus*
- Great crested newt *Triturus cristatus*
- Vegetated sea cliffs of the Atlantic coast
- Submerged sea caves

**Conservation objectives**

3.7 Natural England is in the process of setting out conservation objectives for all SACs and SPAs, and progress towards these objectives can be taken as an indicator of favourable conservation status at a site. Ramsar sites do not have agreed conservation objectives, but in most instances overlap with SPA site boundaries. However, it should be noted that Ramsar qualifying features often include a range of habitats and non-bird species common to SAC designations, as well as bird species and assemblages and their supporting habitats, which are common to SPAs.

3.8 The conservation objectives of the above sites are currently work in progress and are provided in Appendix IV of the Portsmouth Plan’s HRA (UE Associates, 2011).

**Vulnerabilities and opportunities**

3.9 Every European site has distinctive characteristics that make it vulnerable to a variety of impact-inducing activities. Many sites, due to their location or condition, also offer various opportunities for improvement.

3.10 The known vulnerabilities and opportunities of the above named sites are shown in Appendix V of the Portsmouth Plan’s HRA (UE Associates, 2011).
4. Effects of the Seafront Masterplan

Background

4.1 Section 1 included a summary of the overall aims of the SPD. This section will consider the options proposed in order to achieve these aims and, acknowledging that the plan is not necessary to European site management, state whether or not they are likely to have adverse effects on site integrity, either alone or in combination with other plans or projects.

4.2 Site integrity can be described as follows:

“The integrity of a site is the coherence of its ecological structure and function, across its whole area, that enables it to sustain the habitat, complex of habitats and/or the levels of populations of the species for which it was classified.” (ODPM, 2005)

Consideration of effects

4.3 All proposals being considered at the seafront have been screened for likely significant effects on the European sites in question. The effects associated with the SPD can be sorted into one of nine categories, which are listed below in Figure B. These categories are taken from Appendix A of the draft HRA guidance document produced by David Tyldesley and Associates (2006), and help to determine which, if any, elements of the plan would be likely to have a significant effect on any interest feature of any European site, alone or in combination with other projects and plans, directly or indirectly.

4.4 Proposals falling within categories 1 - 7 are deemed not to have an effect on a European site and can be eliminated from the assessment procedure. Those falling within category eight require further analysis, including an in-combination assessment, and should be included in the next stage of the HRA process; while an Appropriate Assessment must be carried out for any policy falling within category nine.

4.5 Table 4 illustrates the results of the HRA screening process for all SPD proposals, where the numbers in each of the coloured cells correspond to a category listed in Figure B. See table 1 for the full list of SPD proposals. This shows that there are potential impacts associated with three of the proposals in the SPD. These will be set out in more detail in the next section. Possible avoidance and mitigation measures which could be included in the SPD are also explored before a re-assessment is made of any residual potential impacts.
Figure B: Categories of proposed actions (source: David Tyldesley and Associates (draft, 2006))

Reasons why proposal will have no effect on a European Site:

1. The proposal will not itself lead to development (e.g. it relates to design or other qualitative criteria for development, or it is not a land use planning policy).

2. The proposal makes provision for a quantum / type of development (and may or may not indicate one or more broad locations e.g. a district, town or suburb) but the location of the development is to be selected following consideration of options in lower tier plans.

3. No development could occur through this proposal alone, because it is implemented through subordinate policies which are more detailed and therefore more appropriate to assess for their effects on European sites and associated sensitive areas.

4. Concentration of development in urban areas will not affect European site and will help to steer development and land use change away from European sites and associated sensitive areas.

5. The proposal will help steer development away from European sites and associated sensitive areas, e.g. not developing in areas of flood risk or areas otherwise likely to be affected by climate change.

6. The proposal is intended to protect the natural environment, including biodiversity.

7. The proposal is intended to conserve or enhance the natural, built or historic environment, and enhancement measures will not be likely to have any effect on a European site.

Reason why proposal could have a potential effect:

8. The proposal steers a quantum or type of development towards, or encourages development in, an area that includes a European site or an area where development may indirectly affect a European site.

Reason why proposal would be likely to have a significant effect:

9. The proposal makes provision for a quantum, or kind of development that in the location(s) proposed would be likely to have a significant effect on a European site. The proposal must be subject to Appropriate Assessment to establish, in light of the site’s conservation objectives, whether it can be ascertained that the proposal would not adversely affect the integrity of the site.
<table>
<thead>
<tr>
<th>European site Dvpt site</th>
<th>Solent and Isle of Wight lagoons SAC</th>
<th>Solent Maritime SAC</th>
<th>Chichester &amp; Langstone Harbours SPA</th>
<th>Chichester &amp; Langstone Harbours Ramsar</th>
<th>Portsmouth Harbour SPA</th>
<th>Portsmouth Harbour Ramsar</th>
<th>Solent &amp; Southampton Water SPA</th>
<th>Solent &amp; Southampton Water Ramsar</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>4</td>
<td>4</td>
<td>4</td>
<td>4</td>
<td>4</td>
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Commentary on Effects

4.7 The emphasis of the HRA screening stage is to identify any proposals likely to lead to a significant effect at a European site. The following sections offer a commentary on why these possible (as opposed to likely) impacts are screened out from further consideration under the Habitats Regulations in relation to the SPD or why a full appropriate assessment is required.

4.8 Each section concludes with a summary of the assessment findings and details of any avoidance and mitigation measures which have been included in the SPD in order to remove any possible impacts.

Disturbance from recreation

4.9 Development can increase the recreational use of the coast, which has the potential to cause detrimental impacts on important bird assemblages. This has links with the impacts from habitat loss as recreation can indirectly cause important habitat to be unavailable for use by birds.

4.10 Research into the impact of recreation is currently underway on a Solent-wide scale (the Solent Disturbance and Mitigation Project, SDMP). Phase one of the project involved a desktop review of existing evidence. Phase two involved primary research consisting of a survey of visitors to European sites, a survey of households along the Solent coast, a bird disturbance survey and computer modeling of European sites to investigate the impacts that disturbance is having on the behaviour and mortality of birds and how this is likely to change in the future as a result of housing development. The intertidal mudflats of the harbours contain the primary feeding resource for the SPA species.

4.11 The SDMP household survey has shown that the section of coast from South Parade Pier to Fort Cumberland (section 52) has 3,059,555 visits per year, which is the highest amount of any section of the Solent coast. The section of the coast from Old Portsmouth Marina to South Parade Pier (section 51) receives 3,059,555 visits per year, which is the second highest amount of any section of the Solent coast. This shows that the geese and waders which currently use these sites are able to successfully feed and roost in the presence of significant human activity. Indeed, Liley, Stillman & Fearnley (2010) concluded that “there was no evidence that more disturbance events occurred at the busiest sites”. As a result, the marginal increase as a result of these developments is unlikely to significantly increase the disturbance to birds using these sites and thus is unlikely to have an adverse effect on the site integrity of nearby SPAs.

4.12 However at high tide, when the intertidal food resource is depleted or during harsh weather, Brent geese use terrestrial grass sites to feed and wading species use them to roost. The Solent Waders and Brent Goose Strategy (SWBGSSG, 2010) contains an analysis of which sites are currently important for these species and which need further data to conclude whether they are important or not. Figure C (below) shows which sites are important and uncertain Brent goose feeding sites or wader roost sites at the seafront. These sites are treated as being effectively part of the SPA and development proposals should not reduce the effectiveness of these sites for feeding or roosting.
Figure C: Brent goose feeding sites, high tide wader roosts and the boundary of the Seafront Masterplan. © Crown Copyright and database right 2012. Ordnance Survey Licence number 100019671
Clarence Pier (opportunity site 2)

4.13 The focus of the SPD development guidance for Clarence Pier is on public realm and recreational improvements to the seafront in order to attract more people to visit the area. However development option A does allow for residential development where it would enhance the viability of the scheme, enabling it to go ahead. Option B is a less comprehensive development option than option A, nonetheless still includes a great deal of new development with the potential to attract increased recreation as a result.

4.14 The sections of Portsmouth Harbour SPA adjacent to the Portsmouth coastline are c3km by direct line of sight from Clarence Pier whilst Chichester and Langstone Harbours SPA/Ramsar site is c4km by direct line of sight from the site. The SDMP visitor survey (Fearnley, Clarke & Liley, 2010) showed that people will go a median distance of 1.2km to walk a dog and 2.7km to go for a walk. Together these two activities account for 86% of the total activity at the survey points. Clarence Pier is beyond these distance thresholds and so it is unlikely that day-to-day recreational activity from new development at Clarence Pier will take place at European sites.

4.15 However the site is immediately adjacent to Southsea Common which has been identified as an important Brent goose feeding site. The Solent Waders and Brent goose strategy also shows that buildings within the 50m-500m zone can make a site less suitable for geese to feed on.

4.16 Nonetheless, the SDMP bird disturbance survey (Liley, Stillman & Fearnley, 2010) found that there was no significant correlation between the number of people recorded within 200m of the birds and the amount of disturbance. Additionally, there was no significant correlation between the total number of people present at the site or the number of groups of people and the amount of disturbance which took place. So sites with high visitor numbers, such as those along the seafront, do not necessarily see the most disturbance taking place.

4.17 The surveys which were done for the Solent Waders and Brent Goose Strategy (SWBGSSG, 2010) also suggest that development will not reduce the effectiveness of nearby terrestrial feeding and roosting sites. Southsea Common (site P35) was surveyed 23 times. On 13 occasions, Brent geese were observed using the site, five times in numbers greater than 100. Some observations include a note as to whether disturbance was taking place. On all the occasions where disturbance was noted, birds were also feeding. Similarly, when there was no disturbance observed, on some occasions the site was being used and on other occasions there were no birds present. Consequently, the data suggests that the observations which were proven at a Solent scale are also present at Southsea Common. The strategy also contained a statistical analysis of sites and the factors which made them more or less suitable for Brent geese to feed on. The presence of homes (and thus people and dogs) close by was not a significant factor in determining the suitability of the site. Furthermore, as noted above, the seafront is the most heavily visited section of the Solent coast. As a result, despite a constant and significant level of activity, Southsea Common has retained its importance as a Brent goose feeding site.

4.18 As a result, disturbance from recreation as a result of development at Clarence Pier will not have a significant impact on the effectiveness of the Brent goose feeding site at Southsea Common. Nonetheless, the city council will continue to engage with the Solent Disturbance
and Mitigation Project as it progresses. Policy PCS13 of the Portsmouth Plan commits the city council to respond to the findings of the project when it is completed and the results of the project will need to be considered when appropriate in determining planning applications.

Watersports hub (opportunity site 14)

4.19 The SPD promotes a watersports hub at the corner of the Esplanade and Henderson Road, adjacent to Eastney Swimming Pool.

4.20 The SDMP Bird Disturbance fieldwork (Liley, Stillman & Fearnley, 2010) showed the differing level of disturbance caused by activity on land compared to activity on water and on the intertidal area. Whilst only 12% of activity on land caused disturbance to birds on the intertidal area, 25% of activity on water caused disturbance.\(^1\)

4.21 The Langstone Harbour Board recognises the issue and a permit is already required to use either jet skies or go water skiing in the harbour. There is also a speed limit of ten knots for jet skies and boats. It is an offence to breach these bylaws and anyone found in breach of the bylaws is prosecuted. To further detract the use of jet skies in the harbour in particular, a dedicated area is in place to the south of Eastney beach which does not have a speed limit.

4.22 However it is unlikely that users of the watersports hub would wish to go into Langstone Harbour anyway. Indeed, it is likely that the presence of a dedicated facility for waterports, with dedicated access in this location will draw watersports users out of the harbor to the area close to the hub. Indeed Portsmouth and District Canoe Club (which currently operate out of Portsmouth Harbour) expressed an interest in relocating to Eastney as part of the consultation process.

4.23 The presence of dedicated watersports facilities is also one of the mitigation measures which is likely to be taken forward in the Solent Disturbance and Mitigation Project. As a result, the waterports hub at Eastney beach could be part of the Solent wide suite of measures which will be put in place to manage disturbance activity at SPAs.

Beach huts (opportunity site 15)

4.24 The SPD promotes new beach huts at Eastney Beach. This development would be close to wader roost P78 in the Solent Waders and Brent Goose Strategy with the beach huts between 10 and 25m to the north of the roost. Whilst the site is less likely to be suitable for Brent Geese, it is identified as an important wader roost site with regular sightings of Dunlin and Ringed Plover. The maximum counts recorded at the site were 600 Dunlin (11/01/2008) and 131 Ringed Plover (04/11/2006).

4.25 As a result of the high volume of usage and the proximity of the development to the wader site, there is the possibility that increased recreation as a result of the occupation of the new beach huts could have a significant impact on the ability of waders to use the beach as a roosting site.

4.26 The beach huts are obviously more likely to be used in the summer months when the waders are not present in the Solent and so cannot be disturbed. However it was not clear the extent

\(^1\) Disturbance includes causing birds to take a short swim, a minor flight (<50m) or a major flight (>50m).
to which the beach huts were likely to be used in the winter months and thus whether there could be an adverse effect on effectiveness of the high tide roost. As a result, a survey was conducted of existing beach hut users at the Seafront (Portsmouth City Council, 2013) to determine usage patterns during the winter months.

4.27 The results showed that approximately a third of users did not use their beach hut at all during the winter months. However the remaining two thirds used their beach hut daily, weekly or monthly. Respondents were also asked how many people visit the beach hut with them with 60% visiting as part of a group of two. Additionally, 20% of respondents stated that they take a dog with them as well.

4.28 These results were then scaled up to determine the impact of an additional 100 beach huts at Eastney. There would be 300 visits to the new beach huts each month during the winter, mostly in groups of two, 57 of which would also include a dog.

4.29 It is likely that some of these extra visits already take place. A very sizeable proportion of those who have applied, or would apply, for a beach hut on the seafront are probably regular visitors anyway. However it is also likely that if they have access to a beach hut, they may well visit more often than they otherwise would have, perhaps with more people and/or spend more time at the seafront when they do visit.

4.30 As a result of the survey results, it is concluded that there could be an adverse effect on the suitability Eastney beach as a wader roost site and thus the ecological integrity of Langstone and Chichester Harbours and Solent and Southampton Water SPA and Ramsar sites. Avoidance and mitigation measures will be needed to remove this. Please see the direct or indirect habitat loss section for how this has been incorporated into the materplan.

**Direct or indirect habitat loss**

4.1 The SPD proposals do not include any direct habitat loss from a European site. However, as described above, the qualifying species for nearby SPAs use feeding sites (in the case of Brent goose) and high tide roosts (in the case of wading birds) which are outside of the SPA boundaries. There are a number of Brent goose feeding sites and high tide wader roosts in the seafront area (SWBGSSG, 2010) as shown above at figure C.

**Clarence Pier**

4.2 The proposals for Clarence Pier include new development and intensification of activity at the pier, which is c130m from Brent goose feeding site P35, separated by a car park.

4.3 Figure D shows in tabular and graphical form the disturbance distances for those species which were included in the SDMP bird disturbance fieldwork (Liley, Stillman & Fearnley, 2010) and are qualifying features of either Portsmouth Harbour SPA or Chichester and Langstone Harbours SPA. This shows that disturbance results from activities of a median distance of 51.5m from Brent goose, and a range of 44.5m to 75m for the wader species. In particular, figure C3 shows that in excess of 75% of events which cause disturbance are at distances below 100m from the birds.
4.4 Liley, Stillman & Fearnley looked in more detail at the three species with the highest sample sizes, which includes both Brent goose and Redshank and analysed their reactions to different activities (see figure D). This showed that, even for activities which are known to cause particularly high levels of disturbance such as dogs being walked off of a lead, the event had to generally be within 100m for it to result in disturbance. Liley, Stillman & Fearnley (2010) concluded in paragraph 3.31 that “In most cases there is a repeated pattern of birds responding when people activities are close and no response occurring when the activities are distant. There are no apparent differences between the different responses…in the distance at which the response occurs. This would suggest that other factors may be influencing how the birds respond to distance”.

![Figure D](image-url)

**Figure D**
Response to disturbance events (1) separated by the qualifying species for Portsmouth Harbour SPA and Chichester and Langstone Harbours SPA. This includes median distances at which human activity resulted in disturbance (2) and distances and categories of response for a selection of species (3).

Source: Liley, Stillman & Fearnley, 2010
4.5 Overall, Liley, Stillman & Fearnley (2010) conclude in paragraph 3.30 that “The proportion of events resulting in the displacement of the bird…declined with distance for most species such that beyond 100m few, if any, events resulted in birds being displaced. Taking the average across all species in the region of 1 in 20 events at 100m resulted in major flight”.

4.6 However the Solent Waders and Brent goose strategy highlights that one issue which makes a site less suitable for Brent geese is the presence of buildings within the 50-500m zone, although buildings close by are less of an issue. As the redevelopment of Clarence Pier would be within this zone, it is possible, depending on the exact design, that there could be a significant impact on the effectiveness of Southsea Common as a Brent goose feeding site. This could be either a temporary impact as a result of construction and/or a permanent impact as a result of the operation of the building. However the severity and cause of this impact will depend upon the exact development type, quantity as well as the increase in height and bulk of the new buildings.

4.7 The city council is currently investigating in detail how Brent geese use Southsea Common as a feeding site. The identified feeding site is large (183,800m²) and so it is likely that some parts of the site are more important and more heavily used than others. The results of this work will be helpful in developers when finalising a development scheme for Clarence Pier.

4.8 Overall, all of the development sites are beyond the 75th percentile distance at which disturbance takes place for all species which are likely to use the nearby feeding and roosting sites. In addition, the area is already subject to a high level of activity. However in the absence of the finalised data into the use of Southsea Common as a Brent goose feeding site and considering that development will be taking place in the 50m-500m zone, avoidance and mitigation measures may be necessary.

### Avoidance or mitigation measure

**Avoiding indirect habitat loss to Southsea Common Brent goose feeding area**

Disturbance from the development has the potential to decrease the suitability of Southsea Common as a Brent goose feeding site. This would have a significant impact on Portsmouth Harbour, Chichester and
Langstone Harbours and Solent and Southampton Water SPA and Ramsar sites.

This could equally be the case for either development options at Clarence Pier and so the text below should clearly relate to both development options.

**Seafront masterplan response**  
*(Section 4.2, ◆ Opportunities at Clarence Pier)*

Additional text should be added to this section to state that: “Southsea Common is an important winter feeding site for Brent geese which are an internationally protected species. It is important that development at Clarence Pier does not reduce the effectiveness of the Common as a feeding site as a result of, for example, the design of buildings, overshadowing or light pollution. Developers should discuss this matter at an early stage with the city council’s ecologist and Natural England. This will ensure that, if necessary, effective design solutions can be found which enable development to go ahead, whilst not impacting on this internationally protected species”

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**Southsea Common gateways & Avenue de Caen Route (opportunity sites 5 & 7)**

4.9 The proposals for Southsea Common include new tree planting at the northern and southern ends of the existing Serpentine Road/footpath. This is also proposed for the northern and southern entrances to the footpath between Clarence Pier and Clarence Parade (the trees are shown on figure 7). The proposals for Avenue de Caen include new bold lighting at the junction with Clarence Esplanade.

4.10 Southsea Common has been identified as an important Brent goose feeding area in the Solent Waders and Brent goose strategy (site P35). The maximum count for this site was 1000 geese (08/01/2007). The strategy carried out a number of detailed statistical comparisons of site use and their characteristics to identify the factors which made sites particularly suitable as Brent goose feeding sites. One of the key factors is the shape and size of the site with larger, more regularly shaped sites being more suitable. Planting trees could potentially ‘break up’ the site, rendering it less regularly shaped and reducing the effectiveness of it for Brent geese.

4.11 However the identified feeding site is very large and it is possible that the geese use some parts of it but not others. The city council is currently doing survey work of Southsea Common and a number of other sites to accurately establish how the sites are used by the geese and whether the entire site is actually used. When the trees are being planted, the results of this survey work should be considered to ensure that the effectiveness of Southsea Common for Brent geese is not reduced.

4.12 Furthermore, the junction of Avenue de Caen and Clarence Esplanade is c130m from the boundary of site P35. As a result, a bold lighting feature at this junction may impact on the ability for geese to effectively feed at the site. Similarly to the tree planting scheme, planning permission may not be required for the lighting feature. However ecological advice, particularly with reference to the surveys which are currently underway, should be sought once the exact design of the lighting scheme is known.
Avoidance or mitigation measure

**This is required to ensuring that Southsea Common remains an effective Brent goose feeding site**

Increasing the tree cover of Southsea Common has the potential to reduce its effectiveness as a Brent goose feeding site. This would have a significant impact on Portsmouth Harbour, Chichester and Langstone Harbours and Solent and Southampton Water SPA and Ramsar sites.

**Seafront masterplan response**

*Section 3.4., Design principles*

Additional text should be added to this section, under the 'planting' sub-heading to state that: "Tree planting can potentially break up open spaces and reduce their effectiveness as Brent goose feeding sites. Ecological advice should be sought once the proposed planting scheme has been put together to ensure that the Brent goose feeding sites at the Seafront are protected and maintained."

To the section titled 'Lighting', the following wording should be added: "Lighting schemes (and art installations - see p. 18) must be carefully assessed in order to ensure that they do not impact on Brent goose feeding sites at the Seafront."

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**Water sports hub and eco-café & beach huts at Eastney (opportunity sites 14 & 15)**

4.13 As set out above, the proposals for Eastney Beach include a Water Sports hub and new beach huts. The watersports hub would be located at the corner of the Esplanade and Henderson Road. There would also be a boardwalk from the watersports hub to the sea. The beach huts would extend westwards from this location, immediately south of the promenade.

4.14 These sites are both close to an identified wader roost site (P78, see above for further details). Site P78 is a bank of shingle.

*Watersports hub*

4.15 The SDMP Household survey shows that this section of the beach is heavily used for watersports already. Additionally, the boardwalk will help to funnel watersports users along this route to the sea, dissuading them from getting close to the wader roost and ensuring they are walking down a predictable route which also helps to minimise the potential for disturbance. Consequently, the net increase in activity will be limited, will be predictable in nature and the activity will not come onto the roost site.

4.16 Nonetheless, the construction activity involved in building the watersports hub would not be possible to completely screen and given the proximity of the waterports hub site to site P78, there would still be the potential for disturbance from construction due to the increase in (particularly unpredictable) noise and activity which could not be completely screened from view.

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**Summary of measures recommended by the HRA**

**This is required to avoid construction impacts to Eastney beach wader roost**

Disturbance from the development has the potential to decrease the suitability of Eastney Beach as a wader roost site. This would have a significant impact on Portsmouth Harbour, Chichester and Langstone Harbours and Solent and Southampton Water SPA and Ramsar sites.
Seafront masterplan response
(Section 4.6, Watersports Hub, Building design)

This section has an additional caveat to the development which states that: "The location of the eco cafe / watersports hub is close to an important winter roost site for Dunlin and Ringed Plover, both of which are intentionally protected species. To ensure that the construction of the facility does not impact on the birds’ ability to use the nearby roost site, construction will need to take place outside of the November - February period."

Beach huts

4.17 As a result of the likely level of usage and the proximity of the development to the wader site, there is the potential for an adverse effect on the wader populations from the beach huts. The wader roost site does not stretch north as far as where the beach huts would be so there is no direct habitat loss. However there could be indirect habitat loss as a result of the proposals. This could be temporary as a result of construction disturbance and/or permanent through increased recreation as a result of the use of the beach huts. The potential for indirect habitat loss through disturbance is addressed above and avoidance and mitigation measures were found to be necessary.

4.18 Although beach huts are largely prefabricated structures, there would be still be the potential for disturbance through the (particularly unpredictable) noise and activity associated with delivering the materials, assembling the huts on site and providing the linking walkways and any foundation works.

4.19 It is possible that screening could be provided to shield bird sightlines from the increased activity. However given that the beach huts would be only 25m from site P78, it would not be possible to eliminate the construction noise. However if the construction activities were limited to the months when the waders are not present at the beach, then the activity could not cause any disturbance.

4.20 Based on the information above, an adverse effect is possible at Chichester and Langstone Harbours and Solent and Southampton Water SPA and Ramsar sites. Avoidance and mitigation measures are required to remove or reduce the effects.

Summary of measures recommended by the HRA

This is required to avoid construction and operational impacts to Eastney beach wader roost

Disturbance from the development has the potential to decrease the suitability of Eastney Beach as a wader roost site. This would have a significant impact on Portsmouth Harbour, Chichester and Langstone Harbours and Solent and Southampton Water SPA and Ramsar sites.

Seafront masterplan response
(Section 4.6, Eco Café & Surrounds, Eastney Beach Huts and boardwalks)

This section should include an additional caveat to the development which states that: "As with the Eco cafe / Watersports Hub, the location of the beach huts is close to the important winter roost site for wading birds and therefore construction of the huts will need to take place outside of the November - February period. People using the new beach huts could also cause disturbance to birds and reduce the effectiveness of this location as a roost site. A strategy for avoiding / mitigating against this impact must form part of any planning application. Potential avoidance / mitigation measures could include (but may not be limited to):

- prohibiting dogs not on a lead on this part of Eastney beach during the winter (this is
- already the case during the summer);
- providing information to new beach hut tenants about the biodiversity of Eastney Beach and how they can help to preserve this special area, and/or
- requiring new beach hut tenants to sign up to a 'code of conduct' setting out expectations of the way in which they should use the area and respect its particular sensitivities.

The proposed strategy should be discussed at the earliest opportunity with the city council’s ecologist and Natural England.

4.21 It is considered that the measures above are the best spatial planning interventions currently available and will ensure that the effects associated with habitat loss can be satisfactorily avoided and reduced.

**Tall buildings and light pollution**

4.22 The masterplan allows for the development of a tall building at Clarence Pier. Tall buildings and other structures can interfere with the normal commuting or migration routes of birds and present a risk of collision mortality. The role of tall buildings and other structures, their design and location in relation to the various sites used by birds will be an important factor in the degree of disorientation and collision risk presented. The issue is not well understood in a local context because there is little research into common commuting routes, but is likely to be both highly spatially specific and weather dependent, and to be affected by the relative location of bird roosts, foraging habitats and proposed new development.

4.23 Light pollution from new buildings, particularly taller ones, has the potential to create disorientation amongst birds and change behaviour. For more detail on this can take place, please see the Portsmouth Plan’s HRA (UE Associates, 2011). Extensive new development is being planned for at Clarence Parade, which could include a tall building. However, the tall building will be approximately 200m from the edge of Brent goose feeding site P35. This is considered far enough away to ensure that light pollution will not impact on the ability for Brent geese to effectively use the site.

4.24 The location of Clarence Pier is south of all identified Brent goose feeding sites and high tide wader roosts. Furthermore, the site is 1,500m from the closest section of Portsmouth Harbour SPA. As a result, of the location of the development site and its distance from the SPA, it is highly unlikely that flight paths would coincide with the site and so the issue of tall buildings has been screened out of the HRA.

**Air quality**

4.25 Air pollution is a relevant issue in Portsmouth, and it is possible that the emissions emanating from the city are having a negative effect on European sites.

4.26 This issue was explored in the Portsmouth Plan’s HRA (UE Associates, 2011) and concluded that the overall level of development could lead to adverse effects but these were avoided and mitigated through measures contained in the plan. Alongside these measures, the Seafront Masterplan includes a redeveloped transport interchange at the seafront to increase its accessibility by public transport.
4.27 The level and nature of development in the Seafront Masterplan will not significantly alter the baseline position and so air quality has been screened out of the HRA process.

**Coastal squeeze**

4.28 Flood risk is a serious ongoing issue in Portsmouth, with flood defences providing the practical solution to prevent serious loss or damage to property or life. Flood defences, however, can lead to negative impacts on intertidal habitats and the species they support through coastal squeeze. The term coastal squeeze refers to the situation coastal habitats and species find themselves in when they are confronted by rising seas on one front and hard-engineered coastal defenses on the other. The relevant habitats and species might naturally migrate inland over time except that flood defenses prevent them from doing so.

4.29 Parts of the SPD area are vulnerable to the risk of flooding and are defended by hard-engineered defenses. There are proposals in the SPD to improve the appearance of these defenses. However the hold the line approach, which has been fully assessed through the Shoreline Management Plan and its HRA (New Forest District Council, 2010), has not been altered through the SPD.

4.30 As the effects of holding the line have been fully assessed elsewhere, coastal squeeze has been screened out of the HRA process.

**Water consumption and waste water production**

4.31 There is likely to be a limited overall net increase in housing across the SPD area as a result of the plan. Residential uses are the primary driver for increasing water consumption and waste water production. Both mechanisms can lead to negative environmental effects on sensitive ecosystems.

4.32 Research carried out at the sub-regional level on behalf of PUSH (Atkins, 2009) has indicated that no significant new waste water treatment infrastructure is required to meet the needs of planned new development over the next twenty years, and that sufficient capacity exists to serve Portsmouth within existing treatment works (Budds Farm) without adverse effects. Similarly, sustainable reductions in the rate of water abstraction identified by the Environment Agency as necessary to protect the integrity of European sites are deliverable through water companies’ Water Resource Management Plans (Southern Water, 2009 and Portsmouth Water, 2011). No significant adverse effects are identifiable in relation to the SPD.
5. Summary and outcomes of the HRA

5.1 This section demonstrates how the HRA has influenced the evolution of the Seafront Masterplan SPD during the plan-making process. It does this by highlighting the residual effects of the SPD, following the application of avoidance and mitigation measures as listed in section 4.

5.2 This is illustrated below in table 5, which demonstrates that, if the suggested avoidance and mitigation measures are proposed in the HRA are implemented, it is currently possible to overcome all possible impacts on the European sites.
### Table 4.1: SPD Proposals Screening Matrix

<table>
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<tr>
<th>European site</th>
<th>Solent and Isle of Wight lagoons SAC</th>
<th>Solent Maritime SAC</th>
<th>Chichester &amp; Langstone Harbours SPA</th>
<th>Chichester &amp; Langstone Harbours Ramsar</th>
<th>Portsmouth Harbour SPA</th>
<th>Portsmouth Harbour Ramsar</th>
<th>Solent &amp; Southampton Water SPA</th>
<th>Solent &amp; Southampton Water Ramsar</th>
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**Legend:**
- **Proposal or related project will require appropriate assessment**
- **Proposal could have a potential effect on a European site, either alone or in combination with other plans or projects**
- **Proposal will have no adverse effect on a European site**
- **Not relevant because of distance from European site**
6. The Screening Statement

6.1 This document sets out the city council’s Habitats Regulations Assessment Screening Statement for the Seafront Masterplan SPD.

6.2 It is the city council’s view that the plan is not likely to lead to significant effects in relation to any of the European sites within the scope of the study.

6.3 Consequently, **an appropriate assessment is not required** and the SPD can be adopted.
References


 Portsmouth City Council (2012). Fraser Battery: Desk study of ecological interests with respect to European protected sites for Nature Conservation.

 Portsmouth City Council (2013). Beach Hut user survey.


