

Habitats Regulations Assessment of the Impact on European Protected Sites of the Manchester City Council Draft Local Plan

August 2025



Prepared by

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For

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Habitats Regulations Assessment (HRA) of the Impact of the Draft Manchester Draft Local Plan on European Protected Sites

1. Introduction

1.1 The UK National Sites Network are sites of exceptional importance for the conservation of species and natural habitats. They are often referred to as 'European' protected sites because of their importance in a wider European context. The purpose of Habitats Regulation Assessment (HRA) of land use plans is to ensure that the protection of the integrity of European protected sites is an integral part of the planning process at a regional and local level. European protected sites comprise Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar sites. Government guidance advises that potential SPAs (pSPA), candidate SACs (cSAC) and potential Ramsar (pRamsar) sites are also included in HRAs.

1.2 Article 6(3) of Council Directive 92/43/EEC transposed into UK law by the Conservation of Habitats and Species Regulations 2017 (as amended) dealing with the conservation of European protected sites states that:

'Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public.'

1.3 The Manchester Local Plan is regarded as a Plan which is considered likely to have significant effect on one or more European protected site and should therefore be subject to assessment.

1.4 It is noted that the Plan being assessed is still at initial draft stage and will be subject to public consultation and likely further amendment. Further Appropriate Assessments may therefore be required if, as expected, changes are made as a result of either the current consultation, future consultations or a future Examination in Public.

1.5 Habitats Regulation Assessments can be seen as having a number of discrete stages -

- Stage 1 – Screening
- Stage 2 – Appropriate Assessment
- Stage 3 – Derogation (compensation) where effects cannot be avoided or mitigated

1.6 This document forms Stage 1 and Stage 2 of the Habitats Regulation Assessment (HRA) process and contributes to the fulfilment of the Council's statutory duty as regards Article 6(3). It is an Opinion and an Assessment of whether the Manchester Local Plan may have a significant effect on the special interest of any European designated protected sites.

It is also an Opinion on, and an Assessment of, whether any of the identified effects (if any) can be avoided or mitigated or whether any of the actions proposed in the plan need adjustment.

1.7 Stage 1 – Screening

The purpose of the Screening stage of the HRA process is to initially identify the risk or the possibility of significant adverse effects on a European site which could undermine the achievement of a site's conservation objectives, and which therefore require further detailed examination through an appropriate assessment. If risks which might undermine a site's conservation objectives can clearly be ruled out (based on the consideration of objective information), a proposal will have no likely significant effect (LSE) and no appropriate assessment will be needed. In order for a policy or an allocation in a Plan to be screened out of the HRA process a conclusion must be made 'beyond reasonable scientific doubt' that the policy or allocation will not have an LSE on the European Protected site or its qualifying features. Case law has established in relation to screening that:

- An effect is likely if it 'cannot be excluded on the basis of objective information' (Waddenzee C127-02 \propto 45). This requires consideration and a conclusion made against known and presented data/survey or results/scientific evidence (e.g. literature review).
- An effect is significant if it 'is likely to undermine the conservation objectives' [of the European protected site (Waddenzee (C127-02 \propto 48))]. This excludes from consideration other impacts not related to the qualifying features and their conservation objectives.
- In undertaking a screening assessment for likely significant effects 'it is not that significant effects are probable, a risk is sufficient, but there must be credible evidence (see above) that there is 'a real, rather than a hypothetical, risk' Boggis v Natural England & Waveney District Council. This refines the understanding of the 'precautionary principle' as it applies to the Habitats Regulations.
- The Sweetman (case C258-11) also offers some simple guidance that the screening step 'operates merely as a trigger', in order to progress to further assessment stages through the process.

1.8 Stage 2 – Appropriate Assessment

In 2017 the decision of the Court of Justice of the European Union (People over Wind, case C323/17) concluded that it was not appropriate within the Screening Stage to consider measures that would mitigate for impacts on the qualifying or designated features of the European site. This ruling has resulted in an update to the Habitats Regulations 2017 as they have been translated into UK domestic legislation and updated Habitats Regulations (amendment)(EU Exit) 2019 to reflect the exit of the UK from the European Union. In a Stage 2 – Appropriate Assessment, evidence and detail should be considered which can demonstrate that a Plan including any embedded measures or additional mitigation can result in a conclusion that there would be no 'adverse effect on integrity' (AEOI), when considering a European site conservation objectives. In applying the Stage 2 – Appropriate Assessment the relevant competent Authority – in this case the Local Authority concerned - must also consider whether there is a relevant planning mechanism (which may apply at a different level of the planning hierarchy) which can secure the necessary mitigation via either conditions or obligations.

In the case of a Strategic Local Plan the level of detail in land use plans concerning developments that will be permitted under the Plan at some time in the future is rarely sufficient to allow the fullest quantification of potential adverse effects. It is therefore necessary to be cognisant of the fact that HRAs for plans can be tiered, with assessments being undertaken with increasing specificity at lower tiers. This is in line with DCLG guidance and court rulings that the level of detail of the assessment, whilst meeting the relevant requirements of the Habitats Regulations, should be 'appropriate' to the level of plan or project that it addresses.

Government guidance says:

"The scope and content of an appropriate assessment will depend on the nature, location, duration and scale of the proposed plan or project and the interest features of the relevant site. 'Appropriate' is not a technical term. It indicates that an assessment needs to be proportionate and sufficient to support the task of the competent authority in determining whether the plan or project will adversely affect the integrity of the site." That is, the Plan must make every effort to ensure that no Policies or Allocations will cause harm to the special nature conservation interest of European sites. But where some doubt remains as to whether harm will occur the plan must show that sufficient safeguards will be in place in other levels of the planning hierarchy to ensure that no harm will be caused to the special interest of European sites. A precautionary approach should always be taken".

The advice of Advocate-General Kokott to the European Court of Justice (9th June 2005, Case C-6/04) is relevant. She commented that:

"It would ...hardly be proper to require a greater level of detail in preceding plans [rather than planning applications] or the abolition of multi-stage planning and approval procedures so that the assessment of implications can be concentrated on one point in the procedure. Rather, adverse effects on areas of conservation must be assessed at every relevant stage of the procedure to the extent possible on the basis of the precision of the Plan. This assessment is to be updated with increasing specificity in subsequent stages of the procedure"

1.9 In Combination Assessment

The Habitats Regulations also include a requirement for an assessment not only for a Plan alone but also for consideration of any LSE in combination with other projects or plans. An 'in combination' assessment should be undertaken for any impact which is shown to have an effect even where it might be considered 'de minimis' for the plan in isolation. In the application of the in-combination test projects or plans are also considered to include reasonably foreseeable proposals (RFP), which may include projects, plans or schemes which have not concluded their passage through the development planning process, whether they are in full or outline or include other strategic planning documents.

Other plans which are also important in the context of the Manchester Local Plan which are considered here in the test of in-combination effects include:

- Places for Everyone Joint Development Plan Document (2024);
- Salford Local Plan: Development Management Policies and Designations (2023);
- Salford Local Plan: Core Strategy and Allocations (in development);
- Greater Manchester Joint Minerals DPD (2013);
- Greater Manchester Joint Waste DPD (2012);
- Other Supplementary Planning Documents and Local Plans.

These usually include their own Habitats Regulation Assessments and the conclusions of these HRAs have been taken into consideration when determining whether or not likely significant effects will occur.

1.10 The Competent Authority

The competent authority under the Habitat Regulations, is the body which undertakes the assessment of likely significant effects (LSE). This is usually the Local Planning Authority in relation to the preparation of Plans or the consideration of planning applications, but may also be another statutory body who has authority and powers to permit, consent or licence activities (e.g. the Environment Agency). Natural England as the statutory government advisor in these matters also has a role in the process to ensure that the Plan will not have any likely significant harmful effects on European sites. Natural England should therefore be consulted on the HRA.

A Judicial Review (R (Preston) v Cumbria County Council [2019] EWHC 1362) concerning a project level HRA ruled that a Local Planning Authority cannot rely on the future decisions and assessment of another permitting competent authority (in this instance the Environment Agency) within their own conclusions on the Screening (Stage 1) and must give consideration of sufficient securing measures (Stage 2 – Appropriate Assessment) at the time of their own determination of an application for development.

Government guidance in this regard which seems relevant to plans, outline proposals or operations which might require an additional consent/permit from a third party indicates:

- a competent authority is permitted to grant a plan or project consent which leaves the applicant free to determine subsequently certain parameters relating to the construction phase, only if that authority is certain that the consent includes conditions that are strict enough to guarantee that those parameters will not adversely affect the integrity of the site.

While this Plan, and the HRA, are at a high tier of the planning process, this is important when considering any necessary mitigation for identified effects.

1.11 The Greater Manchester Ecology Unit

The Greater Manchester Ecology Unit (GMEU), as the specialist ecological adviser to Manchester City Council has prepared this Screening Opinion and Appropriate Assessment. Information held by Natural England and the Joint Nature Conservation Committee (JNCC) was consulted for the qualifying features, the conservation objectives and favourable condition for the European Sites concerned (the information is summarised below).

GMEU ecologists familiar with the European sites concerned and their special interests, reviewed the ecological information. The key vulnerabilities and sensitivities of the European sites concerned are well understood by GMEU allowing for an informed assessment of the possible effects of the Plan, and any specific aims, objectives and policies contained in the Plan.

GMEU has prepared a number of HRAs for Local Plans and Strategies, prepares HRAs for planning applications across Greater Manchester and Lancashire and is often consulted on HRAs prepared by others.

1.12 This report assesses the 'Draft Manchester Local Plan' (2025). It is recognised that as the name suggests the Plan provides a framework for all development in Manchester and that land currently not allocated may come forward for development during the period of the Plan. This HRA will therefore likely be subject to amendment as Plans and associated projects progress.

The assessment takes into account the likely cumulative impacts (in-combination effects) of other Plans, Strategies and Projects within the wider Greater Manchester city region and beyond. Manchester has a key role in driving development across the region, and this role is taken into account in the HRA.

2.0 Brief description of the Plan

2.1. The Plan being assessed is the Draft Manchester Local Plan, July 2025.

2.2. The primary purpose of the Local Plan is to guide development proposals within the City of Manchester up to 2040.

The Vision for the Plan is –

'After the best start in life, Manchester people in 2035 will enjoy more healthy, happier years.'

Mancunians – adopted and home-grown –will be prouder still, celebrating their city. They'll feel valued and respected, supported to play their part in their city's life, and use their unique strengths to make a Manchester we can all be proud of.'

Manchester people will share in a growing and more equitable economy that brings better jobs and prospects, developing and enjoying new technology that boosts public services and quality of life.'

Manchester will be an even more must-see city, with amazing things to do. Our neighbourhoods will be clean and green, with good-quality affordable homes and good public services.'

Mancunians will feel safer indoors, outdoors and online.'

We will stay on track to reduce Manchester's carbon emissions and manage the impacts of climate change.'

Our public transport will be greatly improved; it will be quick, cheap, clean and reliable.'

And our world-renowned sport and culture will be there for everyone, everywhere across the city, earning global recognition, attracting international visitors and winning Manchester the admiration it deserves.'

2.3 The Principal Objectives of the Plan for Manchester are to –

- Ensure that through high quality design we continue to create an inclusive, sustainable, attractive and accessible city.
- Ensure that social infrastructure (education, social care and health) needs are considered at an early stage in the planning process, where appropriate.
- Improve the education and skills of Manchester residents so that they are able to participate in the growth of the city and through employment, benefit from its prosperity.
- Provide improved opportunities for a healthy, active lifestyle.
- Provide an inclusive environment reducing inequalities, creating a child friendly city and those with protected characteristics
- Protect and enhance the quality and function of both the natural and built environment of the city

- Provide for a significant increase in high quality housing, affordable to all income groups, in attractive, safe and cohesive neighbourhoods.
- Support a network of distinctive high-quality centres, strengthening local identity and providing essential services close to homes.
- Use existing assets to define and improve the character and sense of place within neighbourhoods.
- Ensure sufficient land for employment Continue to enhance the environment of the City Centre to make it an even more attractive and resilient place and thereby help ensure its future prosperity
- Support low-carbon development in accessible locations that will improve the economic performance of the city and provide and attract new employment, particularly in the City Centre and around the airport.
- Improve the physical connectivity of the city, through sustainable, accessible and resilient transport networks, to enhance its competitiveness, provide access to jobs, services, shops, and leisure opportunities, whilst addressing air quality and greenhouse gas emissions.
- Support higher density development around key transport developments including Metrolink stops.
- Support the growth of Manchester Airport as the North of England's principal international gateway.
- Ensure that the opportunities created by any future high speed link station at Piccadilly which increases investment within the city and the wider conurbation is fully captured.
- Enable everyone living, working or visiting the City to enjoy the experience and contribute towards its sustainable growth.
- Support the sustainable growth of the City Centre as the primary focus for economic development in the City, and as the principal public transport hub for the north of England.
- Contribute to addressing the causes and consequences of climate change by reducing carbon emissions. Supporting investment in the retrofitting of existing stock and incorporating resilience within design and operation of development

3.0 Identification of European designated sites concerned

- 3.1 This Assessment has first screened all European sites in the region to generate a long list and then assess which of these sites are likely to be affected by future development in Manchester. There are no European designated sites within the boundaries of Manchester, but when assessing the impact of a Plan on European protected sites it is important to consider the impact on sites not only within the administrative area covered by the Plan but also those which fall outside the Plan boundary, as these could still potentially be affected by the operation of the Plan. This is particularly the case with Manchester, since development within the City has a significant influence on the wider region

The list of sites assessed and their proximity to Manchester are shown in Appendix 1.

The Screening Criteria

- 3.2 In carrying out the initial screening process, the Assessment has considered the main possible **sources** of effects on the European sites arising from the Plan, possible **pathways** to the European sites and the effects on possible sensitive **receptors** in the European sites. Only if there is an identifiable source, a pathway and a receptor is there likely to be a significant effect.
- 3.3 Possible sources and pathways for effects arising from development in Manchester on the identified Sites and used in the screening of European sites are considered to be:
- Water pollution and impacts on hydrology via watercourse, surface water and groundwater moving from Manchester to European sites (habitat damage and species loss);
 - Air pollution, primarily transport related via road traffic (habitat damage);
 - Increased recreational disturbance of European sites and functionally linked land* (species disturbance and habitat damage);
 - Risk of invasive non-native species introduction via waterways (habitat and species impacts);
 - Loss of functionally linked land
- * functionally linked land is land outside of designated sites but which is regularly used by key species associated with a designated site and which is considered to be key to the survival of the species concerned*
- 3.4 Guidance and precedence concerning distances at which significant effects on European sites are caused by water or air pollution has been taken into account during the screening of European sites. Recommended buffer zones for certain types of 'most damaging' operations (eg air pollution from vehicles and recreational disturbance) have been used in the screening of sites. The buffer zones are based on the distances before air pollution sources and recreational disturbance become so diffuse so as to be indiscernible or impossible to ascribe to particular source. Outside of these buffer zones significant effects on European sites arising from water and air pollution are considered unlikely to arise.
- 3.5 Natural England also publish SSSI 'Impact Risk Zones' (IRZs) providing guidance on the types of development which should be considered for their possible impacts on SSSIs and which impacts should be considered. All European designated sites are also designated as SSSIs. IRZs have also been taken into account when screening European sites that could be affected by the Plan.
- 3.6 The nine authorities involved for the Places for Everyone (PfE) strategic plan (including Manchester) have published a supplementary planning document (SPD) covering Holcroft Moss (part of the Manchester Mosses SAC). An SPD has also been published by Oldham, Rochdale and Tameside covering the South Pennines SAC/SPA. These documents have also been taken into account when Screening European sites that could be affected by the Plan.
- 3.7 Although guidance concerning buffer zones/risk zones has been taken into account when screening European protected sites, in the case of a Plan affecting the development of an entire metropolitan area, buffer/risk zones should be regarded as important but **not** as definitive; for example, this buffer zone may not be sufficient when assessing certain very large-scale developments, secondary impacts, or cumulative impacts where pathways to receptor sites are rivers, air pollution is a factor or the receptor site is sensitive to recreational pressure resulting from an increase in population.

3.8 Taking the above into account the following European sites are Screened In owing to proximity to Manchester or because there are likely pathways between Manchester and the designated sites -

- Manchester Mosses SAC,
- Rochdale Canal SAC,
- Rixton Clay Pits SAC;
- Mersey Estuary SPA/Ramsar (hydrological connectivity via the Rivers Irwell and Mersey)
- Rostherne Mere Ramsar
- Martin Mere SPA/Ramsar,
- South Pennines Moors SAC/SPAs Parts 1 and 2 (air quality impacts) and:
- Sefton Coast SAC (Potential recreational destination).

Other European sites initially considered but Screened-out of the assessment include:

- Liverpool Bay SPA– whilst hydrologically linked to Manchester the volume of water in Liverpool Bay is such that any pollutants generated in Manchester could not be reasonably attributed to any likely significant effects owing to a reduction in Water quality detected in Liverpool Bay SPA.
- Dee Estuary SPA/Ramsar – whilst hydrologically linked to Manchester any pollutants generated in the Manchester could not be reasonably attributed to any likely significant effects owing to a reduction in water quality detected in the Dee Estuary SPA/Ramsar.
- Ribble and Alt Estuaries SPA/Ramsar – whilst potentially hydrologically linked to Manchester any pollutants generated in the Manchester could not be reasonably attributed to any likely significant effects owing to a reduction in water quality detected in the Ribble and Alt estuaries. The SPA is also considered too distant from Manchester to ascribe recreational disturbance effects to any development in the City.

4.0 Initial Screening of potential Likely Significant Effects (LSE) -

Sources are described and considered in more detail below. The aim of this section is to provide reasoned justification for the decisions made later in the Screening.

4.1 Given the distances of potential developments within Manchester from the European sites concerned, and the special nature conservation interests of the European sites Screened in, the following impacts can be effectively Screened out of the assessment as being very unlikely to be caused through the operation of the Plan, or any effects will be so diffuse or diluted so as to be *negatory* (that is, too small to be distinguished from background):

- Direct Habitat Loss
- Noise Disturbance
- Light Spillage or shading
- Risk of invasive non-native species introduction (whilst theoretically introduced species could be transported down to the Mersey Estuary as the river is freshwater and the estuary is salt water, the risks are negligible. Invasive species are not listed as a constraint to the restoration of the Manchester Mosses SAC).

4.2 The following impacts have been Screened In to the assessment as considered to have the potential to cause likely significant effects:

- Diffuse water pollution

- Diffuse air pollution primarily that generated by road traffic;
- Increased recreational pressure;
- Loss of functionally linked land *and*;
- Disturbance of functionally linked land.

The following brief discussion of these impacts is included to give an understanding of the rationale for the conclusions reached in the subsequent Screening process, summarised in Table 6.1.

4.3 Water Quality

4.3.1 Negative effects on distant European sites, both habitats and qualifying species, can occur through increases in water pollution and sediment load such as nutrient enrichment from diffuse pollution discharged from waste water treatment works, agricultural run-off and/or industrial processes.

4.3.2 Of the list of designated sites considered, diffuse water pollution could have an effect on the Mersey Estuary SPA/Ramsar Site, via the River Mersey and the Manchester Ship Canal.

Prior to discharging into the Estuary these watercourses pass through other Metropolitan areas and districts with the Mersey Estuary adjacent to the very large Merseyside conurbation. The Estuary receives inputs from many disparate sources. It would therefore be very difficult to establish whether any water pollution arising from development in Manchester was responsible for a significant effect on pollution of the Mersey Estuary. However, given the need to take a precautionary approach when preparing an HRA and the level of pollutants which *could* arise from within Manchester, the Mersey Estuary has been 'Screened In' to this assessment.

4.3.3 There is little possibility of water pollution generated in Manchester affecting the Rochdale Canal SAC, since whilst there is hydrological connectivity along the Canal the direction of flow in the Canal is from Rochdale towards Manchester.

4.4 Air Quality

Air can transport pollution, dust and odours over significant distances and air pollution can cause significant harm to habitats and species. The main types of air pollutants likely to have an adverse effect on an ecologically important site are:

- Oxides of Nitrogen (NO_x);
- Ammonia (NH₃);
- Dust;
- Sulphur Dioxide (SO₂);
- Low level Ozone (O₃);
- Acid deposition caused from chemical reactions to NO_x, SO₂ and CO₂.

4.4.1 Of these NO_x (nitrates) are the most likely to arise as a result of development controlled by the Plan under consideration here. Dust and low-level ozone only have effects very close to the source. Ammonia emissions are most closely associated with certain types of intensive agricultural production not identified as a significant land-use within the City of Manchester. SO₂ emissions are associated with certain industrial operations such as paper pulp, cement and smelting and burning of fossil fuels such as coal and oil.

The main sources of these pollutants are road traffic. The greatest damage caused by nitrates occurs within 200 - 250m of the source. Although development in Manchester will be located further than 250m from any European sites, it is recognised that development

within Manchester could generate road traffic over a much wider area and some of this traffic may subsequently pass within 250m of a European site. Where proposed developments within Manchester are likely to result in increases of these pollutants arising, they have been screened into this Assessment.

- 4.4.2 Although it is recognised that the expansion of Manchester Airport could lead to increases in air pollution, both from increased aircraft movements and through increased road traffic generation to and from the Airport, the Plan being Assessed does not have control over aircraft movements (airside operations) and therefore this source is Screened out of this Assessment. Potential increases in road traffic are however Screened in.
- 4.4.3 The issue of diffuse air pollution is complicated by the fact that two of the European sites of concern to this Assessment (the Manchester Mosses SAC and Rixton Clay Pits SAC) are already exceeding nitrate levels which would be considered harmful to sensitive habitats on these sites (*source* Natural England and Air Pollution Information System (APIS)), so any level of increased nitrate pollution no matter how small could be considered to be harmful. Habitats in the South Pennines SAC are also susceptible to air pollution.
- 4.4.4 A joint Supplementary Planning Documents has been produced by the nine Places for Everyone authorities and Warrington Borough Council providing guidance on when levels of traffic generation are likely to require mitigation with regards to Holcroft Moss, part of the Manchester Mosses SAC. The current guidance is that any development that generates more than 100 vehicle movements along the M62 or 20 HGV's will exceed the threshold. This includes development within Manchester
- 4.4.5 For Rixton Clay Pits SAC and the South Pennines SAC/SPA and other parts of the Manchester Mosses SAC no guidance is currently available. They have therefore been screened-in using the precautionary principle.
- 4.4.6 Whilst no significant new heavy industrial processes are currently proposed in the Plan applications may come forward that have emissions that would require permitting by the Environment Agency. Any such application should therefore be accompanied by an Air Quality Assessment that includes potential effects on European protected sites.

4.5 Recreational Pressure

The effects of significantly increased populations and associated recreational pressures on the Regions' European protected sites has been considered in this Assessment because it is recognised that this could have a negative effect on the special interest of some European sites.

Recreational use of an internationally designated site has potential to:

- Cause damage through excessive erosion (trampling, wear and tear);
- Cause nutrient enrichment;
- Cause disturbance to sensitive species,
- Prevent appropriate management or exacerbate existing management difficulties.

- 4.5.1 The European protected sites considered to be potentially most at risk from increased recreational pressures are the Rochdale Canal SAC, the Manchester Mosses SAC, Rixton Clay Pits SAC, the Sefton Coast SAC and Martin Mere SPA/Ramsar.

- 4.5.2 The Rochdale Canal SAC has been designated because it supports important

populations of aquatic plants. Increases in recreational canal boat use along the Canal could cause harm to aquatic plants. Boat movements along the Canal, and populations

of notable aquatic plant species, are monitored and controlled by the Canal and Rivers Trust.

- 4.5.3 Closely managed access occurs at Rixton Clay Pits SAC, parts of the Manchester Mosses SAC, (Risley Moss Country Park) and Martin Mere SPA/Ramsar. Any changes to population levels or access arrangements (e.g. promotion, improved footpaths, facilities, events etc) could have impacts on these sites.
- 4.5.4 Of the other European sites located at a greater distance, the Sefton Coast SAC and the South Pennines SPA and SAC are in part promoted as recreation destinations and are therefore potentially vulnerable to an increase in population in Manchester.
- 4.5.5 Natural England have advised that there is no available evidence that recreational disturbance of the South Pennines SPA or SAC will result in any likely significant effects. (*ref. letter dated 7th August 2024 from Natural England to the GMCA*). The Sefton Coast SAC/Ribble & Alt Estuaries are therefore Screened-in and the South Pennines SPA/SAC Screened out.
- 4.5.6 The qualifying habitats of Lowland raised bog such as occur within the Manchester Mosses SAC, and the sand dunes of the Sefton Coast SAC, are sensitive to recreational activity. These include increased access by pedestrian off-road 4x4 vehicles, motorbikes, trail/mountain bikes and horse riding that can cause erosion of the peat and sand dune habitats. Increased access can also result in an increase in the number of accidental fires which on peat habitats can result in long-term habitat degradation.
- 4.5.7 The qualifying species of the Mersey Estuary SPA/Ramsar which include breeding and wintering birds are also at risk from recreational disturbance. Both European sites are therefore screened in for recreational disturbance.
- 4.5.8 It is therefore considered that the additional recreational pressures arising from the likely increased population resulting from development within Manchester on European protected sites will need to be screened-in.

4.6 Functionally Linked Land

For an area to be considered to be functionally linked to a European site it must be shown to regularly support significant numbers of species for which a European site has been designated. 'Regularly' is taken to mean over a number of years, but there is no accepted standard definition of what may constitute 'significant numbers' because this will depend on the species concerned.

The concept has been most often studied in relation to birds, bats and marine species, because these species are highly mobile in their habits and can rely on sites very far apart to complete their life cycles.

- 4.6.1 There is a theoretical risk of land in Manchester being functionally linked to the Mersey Estuary SPA/Ramsar (along the Mersey Valley) as the qualifying species are again primarily birds that utilise land and waterbodies outside the designated areas. For this reason, risk to functionally linked land associated with the Mersey Estuary SPA/Ramsar has been Screened-in.

4.7 Summary Results of Screening of Sites

From the Screening process, the following European designated sites have been identified as having some potential to be affected by development proposed and planned for within the Manchester Draft Local plan:

- Manchester Mosses SAC;
- Rochdale Canal SAC
- Rixton Clay Pits SAC;
- Martin Mere SPA/Ramsar site
- Mersey Estuary SPA/Ramsar;
- South Pennine Moors SPA/SAC (Parts 1 and 2);
- Sefton Coast SAC.

Rostherne Mere Ramsar site can be Screened-out at this stage as there are no likely pathways to this site for likely significant effects to occur.

5.0 The Nature Conservation Interest of the “Screened In” European Sites

The following information is derived from information available from Natural England and the Joint Nature Conservation Committee and from information held by GMEU.

5.1 Manchester Mosses SAC

5.1.1 Description of the Manchester Mosses SAC

Mossland formerly covered a large part of low-lying Greater Manchester, Merseyside and southern Lancashire, and provided an obstacle to industrial and agricultural expansion. While most has now been converted to agriculture or lost to development, several examples have survived as degraded raised bog, such as Astley & Bedford Mosses (Manchester), Risley Moss (Warrington) and Holcroft Moss (Warrington). Their surfaces are now elevated above surrounding land due to shrinkage of the surrounding tilled land, and all except Holcroft Moss have been cut for peat at some time in the past. While historic drainage has resulted in purple moor-grass (*Molinia caerulea*), bracken (*Pteridium aquilinum*) and birch (*Betula*) spp. scrub or woodland colonising the lowland bog habitat, wetter pockets have enabled the peat-forming species to survive. Habitat management including rewetting and reintroduction of appropriate lowland bog species has started to reverse the degradation of these sites.

5.1.2 Primary Reason for Designation of the Manchester Mosses SAC

The site supports degraded bog still capable of natural regeneration (JNCC code 7120), which has the potential to be restored to active raised bog (JNCC code 7110).

5.1.3 Conservation Objectives of the Manchester Mosses

The conservation objectives (Natural England 2018) for this site are:

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring:

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

5.1.4 Supplementary Advice on Conserving and Restoring

On this site, favourable condition requires the maintenance of the extent of each designated habitat type. A series of site-specific targets, which will contribute to favourable condition, have been produced by Natural England. However, many of these relate to management of the habitats on the site and are not particularly applicable to assessing the effects of development proposals on the SAC whilst others relate to direct impacts. Therefore, the operations that may damage the special interest of the SAC resulting from development in Manchester have been restricted to:

- Pollution including atmospheric pollutants and NO_x;
- Hydrological impacts and;
- Recreational activities.

5.2 Rixton Clay Pits SAC

5.2.1 Description of Rixton Clay Pits SAC

Situated east of Warrington, this site comprises parts of an extensive disused brickworks excavated in glacial boulder clay. The excavation has left a series of hollows, which have filled with water since workings ceased in the 1960s, leading to a variety of pond sizes. New ponds have also been created more recently for wildlife and amenity purposes. Great crested newts (*Triturus cristatus*) are known to occur in at least 20 ponds across the site. The site also supports species-rich grassland, scrub and mature secondary woodland.

5.2.2 Primary Reason for Designation of Rixton Clay Pits

The primary reason for the designation of Rixton Clay Pits is its significant population of great crested newts (*Triturus cristatus*), a European protected species. Sites selected as SACs where there is evidence of a relatively large and robust population of great crested newts, based on reliable recent survey data.

5.2.3 Conservation Objective for Rixton Clay Pits

The conservation objectives (Natural England 2018) for this site are:

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring:

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

5.2.4 List of operations that could potentially damage the special interests of the European Site include:

- Human intrusions and disturbances.

Additionally, Natural England also states that the site is sensitive to air quality.

5.3 Martin Mere SPA & Ramsar Site

5.3.1 Description of Martin Mere SPA/Ramsar

Martin Mere is a low-lying wetland complex of open-water, marsh and grassland habitats overlying deep peat. It is situated to the north of Burscough and occupies part of the site of the old Martin Mere which, prior to drainage, was probably the largest lake in Lancashire. Acquired by the Wildfowl and Wetland Trust in 1974, the site has been transformed into a reserve of international importance for waterfowl.

5.3.2 Primary Reason for Designation of Martin Mere SPA/Ramsar

The principal interest of the site lies in the number of migrant birds it supports during the winter months. Of particular importance are wintering populations of pink-footed geese, teal and pintail in excess of 1% of the NW European population. Martin Mere also supports

nationally important numbers of bewick swan, gadwall, mallard, whooper swan and shoveller and nationally important numbers of snipe, lapwing, black-tailed godwit and ruff.

Qualifying Species

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

Over Winter

Bewick Swan *Cygnus columbianus bewickii*

Whooper Swan *Cygnus cygnus*

The site qualifies under Article 4.2 of the Directive (79/409/EEC) by supporting populations of European importance of the following species listed.

Over winter

Pintail *Anas acuta*

Pink-footed Geese *Anser brachyrhynchus*

Teal *Anas crecca*

Assemblage qualification: A wetland of international importance.

The area qualifies under Article 4.2 of the Conservation of Wild Birds Directive (79/409/EEC) by regularly supporting at least 20,000 waterfowl. Over winter, the site regularly supports 46,196 individual waterfowl (5 year peak mean 1991/2 – 1995/6) including: pochard *Aythya farina*, mallard *Anas platyrhynchos*, teal *Anas crecca*, wigeon *Anas penelope*, pintail *Anas acuta*, pink-footed goose *Anser brachyrhynchus*, whooper swan *Cygnus cygnus* and Bewick's swan *Cygnus columbianus bewickii*.

5.3.3 Conservation Objectives

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;

- The extent and distribution of the habitats of the qualifying features
- The structure and function of the habitats of the qualifying features
- The supporting processes on which the habitats of the qualifying features rely
- The population of each of the qualifying features, and
- The distribution of the qualifying features within the site.

5.3.4 List of operations that could potentially damage the special interests of the European Site include from the JNCC standard data sheet and Natural England advice on operations:

- Invasive non-native species;
- Pollution to ground water (point sources and diffuse pollution)
- Human induced changes in hydraulic conditions (impacts of drainage and peat shrinkage)

5.4 Mersey Estuary SPA/Ramsar

5.4.1 Description

The Mersey Estuary is located on the Irish Sea coast of north-west England. It is a large, sheltered estuary that comprises large areas of saltmarsh and extensive intertidal sand- and mud-flats, with limited areas of brackish marsh, rocky shoreline and boulder clay cliffs, within a rural and industrial environment. The intertidal flats and saltmarshes provide feeding and roosting sites for large populations of waterbirds. During the winter, the site is of major importance for ducks and waders. The site is also important during the spring and autumn migration periods, particularly for wader populations moving along the west coast of Britain.

5.4.2 Primary Reason for Designation

Qualifying species

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

Over winter

Golden Plover *Pluvialis apricaria*, 3,070 individuals representing at least 1.2% 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 *Tringa totanus*, 3,516 individuals representing at least 2.0% of the Eastern Atlantic - wintering population (5 year peak mean, 1987-1991)

Ringed Plover *Charadrius hiaticula*, 1,453 individuals representing at least 2.9% of the Europe/Northern Africa - wintering population (Count, as at 1989)

Over winter

Dunlin *Calidris alpina*, 44,300 individuals representing at least 3.2% of the wintering Northern Siberia/Europe/Western Africa population (5 year peak mean 1991/2 - 1995/6)

Pintail *Anas acuta*, 2,744 individuals representing at least 4.6% of the wintering North-western Europe population (5 year peak mean 1991/2 - 1995/6)

Redshank *Tringa totanus*, 4,689 individuals representing at least 3.1% of the wintering Eastern Atlantic - wintering population (5 year peak mean 1991/2 - 1995/6)

Shelduck *Tadorna*, 5,039 individuals representing at least 1.7% of the wintering North-western Europe population (5 year peak mean 1991/2 - 1995/6)

Teal *Anas crecca*, 11,667 individuals representing at least 2.9% 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 Conservation of Wild Birds Directive (79/409/EEC) by regularly supporting at least 20,000 waterfowl

Over winter, the area regularly supports 99,467 individual waterfowl (5 year peak mean 1991/2 - 1995/6) including: Curlew *Numenius arquata*, Black-tailed Godwit *Limosa limosa*

islandica, Lapwing *Vanellus vanellus*, Grey Plover *Pluvialis squatarola*, Wigeon *Anas penelope*, Great Crested Grebe *Podiceps cristatus*, Redshank *Tringa totanus*, Dunlin *Calidris alpina alpina*, Pintail *Anas acuta*, Teal *Anas crecca*, Shelduck *Tadorna tadorna*, Golden Plover *Pluvialis apricaria*.

5.4.3 Conservation Objectives

To ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Conservation of Wild Birds Directive, by maintaining or restoring:

- The extent and distribution of the habitats of the qualifying features;
- The structure and function of the habitats of the qualifying features;
- The supporting processes on which the habitats of the qualifying features rely;
- The population of each of the qualifying features and;
- The distribution of the qualifying features within the site.

5.4.4 List of operations that could potentially damage the special interests of the European Site include from the JNCC standard data sheet and Natural England advice on operations:

- Outdoor sports and leisure activities, recreational activities;
- Invasive non-native species;
- Changes in biotic conditions;
- Commercial shipping;
- Construction of port and harbour structures and;
- Dredging proposals.

5.5 Rochdale Canal SAC

The Rochdale Canal SAC contains important habitats for submerged aquatic plants and emergent vegetation, including extensive colonies of the nationally scarce floating water-plantain *Luronium natans*. The site also supports a diverse assemblage of aquatic flora, in particular nine species of pondweed *Potamogeton* spp. The plant communities found in the Rochdale Canal are characteristic of mesotrophic water bodies, i.e. those which are moderately nutrient-rich.

Conservation Objectives

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring –

- The extent and distribution of the habitats of qualifying species
- The structure and function of the habitats of qualifying species
- The supporting processes on which the habitats of qualifying species rely
- The populations of the qualifying species, and,
- The distribution of the qualifying species within the site

List of operations that could potentially damage the special interests of the European Site include from the JNCC standard data sheet and Natural England advice on operations:

- Human induced changes in hydrological conditions
- Invasive non-native species;
- Changes in abiotic conditions;
- Water pollution
- Air pollution, air-borne pollutants;
- Biocenotic evolution, succession.

- Recreational disturbance, especially increases in canal boat traffic

5.6 Sefton Coast SAC

5.6.1 Description

The Sefton Coast in north-west England displays both rapid erosion and active shifting dunes. A substantial stretch of the dune system is fronted by shifting dunes.

The sequence of habitats from foredunes to dune grassland and dune slack is extensive, and substantial areas of open dune vegetation remain. There are large areas of semi-fixed and fixed dunes with herbaceous vegetation exhibiting considerable variation from calcareous to acidic.

5.6.2 Primary Reasons For Designation of the Sefton Coast SAC

Qualifying habitats: The site is designated under article 4(4) of the Directive (92/43/EEC) as it hosts the following habitats listed in Annex I:

- Atlantic decalcified fixed dunes (*Calluno-Ulicetea*). (Coastal dune heathland)*
- Dunes with *Salix repens* ssp. *argentea* (*Salicion arenariae*). (Dunes with creeping willow)
- Embryonic shifting dunes
- Fixed dunes with herbaceous vegetation ("grey dunes"). (Dune grassland)*
- Humid dune slacks
- Shifting dunes along the shoreline with *Ammophila arenaria* ("white dunes"). (Shifting dunes with marram)

Qualifying species: The site is designated under article 4(4) of the Directive (92/43/EEC) as it hosts the following species listed in Annex II:

- Great crested newt *Triturus cristatus*
- Petalwort *Petalophyllum ralfsii*

Annex I priority habitats are denoted by an asterisk (*).

5.6.3 Conservation Objective for Sefton Coast SAC

The conservation objectives (Natural England 2018) for this site are:

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring:

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

5.6.4 List of operations that could potentially damage the special interests of the European Site include from the JNCC standard data sheet and Natural England advice on operations:

- Human induced changes in hydraulic conditions
- Invasive non-native species;

- Changes in abiotic conditions;
- Air pollution, air-borne pollutants;
- Biocenotic evolution, succession.

5.7 South Pennines Moors (Phase 1 and Phase 2) SPA

5.7.1 Description

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

5.8.2 Primary Reason for Designation

Qualifying species

This site qualifies under Article 4.1 of the Conservation of Wild Birds Directive (79/409/EEC) as it is used regularly by 1% or more of the Great Britain population of species listed in Annex I

In any season:

Merlin (*Falco columbarius*) 30 – 36 breeding pairs representing 2.3-2.8% of the breeding population in Great Britain (period 1990/1998)

Golden Plover *Pluvialis apricaria*) 435 - 445 breeding pairs representing 1.9-2.0% of the breeding population in Great Britain (period 1990/1998)

Short-eared Owl (*Asio flammeus*) 22 - 25 breeding pairs representing 2.2 -2.5% of the breeding population in Great Britain (period 1990/1998)

Non-qualifying species of interest:

The site supports a rich upland breeding bird assemblage which, as well as the qualifying species listed above, includes important numbers of Peregrine (*Falco peregrinus*), Lapwing (*Vanellus vanellus*), Dunlin (*Calidris alpina schinzii*), Snipe (*Gallinago gallinago*), Curlew (*Numenius arquata*), Redshank (*Tringa tetanus*), Common Sandpiper (*Actitis hypoleucos*), Whinchat (*Saxicola rubetra*), Wheatear (*Oenanthe oenanthe*), Ring Ouzel (*Turdus torquatus*) and Twite (*Carduelis flavirostris*).

5.8.3 Conservation Objectives

- The extent and distribution of the habitats of the qualifying features;
- The structure and function of the habitats of the qualifying features;
- The supporting processes on which the habitats of the qualifying features rely;
- The population of each of the qualifying features and;
- The distribution of the qualifying features within the site.

5.8.4 List of operations that could potentially damage the special interests of the European Site include:

- Hunting and collection of Wild Animals;
- Fire and Fire Prevention;
- Human induced changes in hydraulic conditions;
- Outdoor sports, leisure and Recreational Activities;
- Outdoor sports, leisure and recreational activities to functionally linked land and;
- Reduced fecundity and genetic suppression.

5.9 South Pennine Moors SAC

5.9.1 Description

This site covers the key moorland blocks of the Southern Pennines from Ilkley Moor in the north to the Peak District in the south. The moorlands are on a rolling dissected plateau formed from rocks of Millstone Grit at altitudes of between 300m – 600m and a high point of over 630m at Kinder Scout. The greater part of the gritstone is overlain by blanket peat with the coarse gravelly mineral soils occurring only on the lower slopes. The moorlands as a whole support a breeding bird community of national and international importance. The site is representative of upland dry heath, which covers extensive areas, occupies the lower slopes of the moors on mineral soils or where peat is thin, and occurs in transitions to acid grassland, wet heath and blanket bogs. The upland heath of the South Pennines is strongly dominated by *Calluna vulgaris* – *Deschampsia flexuosa* heath and *C. vulgaris* – *Vaccinium myrtillus* heath. More rarely *C. vulgaris* – *Ulex gallii* heath and *C. vulgaris* – *Erica cinerea* heath are found. On the higher, more exposed ground *V. myrtillus* – *D. flexuosa* heath becomes more prominent. The smaller area of wet heath is characterised by cross-leaved heath *Erica tetralix* and purple moor grass *Molinia careulea*. The site also supports extensive areas of acid grassland largely derived from dry and wet heath. In the cloughs, or valleys, which extend into the heather moorlands, a greater mix of dwarf shrubs can be found together with more lichens and mosses. The moors support a rich invertebrate fauna, especially moths, and important bird assemblages. This site also contains areas of blanket bog, although the bog vegetation communities are botanically poor. Hare's-tail cotton-grass *Eriophorum vaginatum* is often overwhelmingly dominant and the usual bog-building Sphagnum mosses are scarce. Where the blanket peats are slightly drier, heather *C. vulgaris*, crowberry *Empetrum nigrum* and bilberry *V. myrtillus* become more prominent. The cranberry *Vaccinium oxycoccus* and the uncommon cloudberry *Rubus chamaemorus* is locally abundant in bog vegetation. Bog pools provide diversity and are often characterised by common cotton-grass *E. angustifolium*. Substantial areas of the bog surface are eroding, and there are extensive areas of bare peat. In some areas, erosion may be a natural process reflecting the great age (up to 9000 years) of the South Pennine peats. Around the fringes of the upland heath and areas of bog are blocks of old sessile oak woods, usually on slopes. These tend to be dryer than those further north and west, such that the bryophyte communities are less developed (although this lowered diversity may in some instances have been exaggerated by the effects of 19th century air pollution). Other components of the ground flora such as grasses, dwarf shrubs and ferns are common. Small areas of alder woodland along stream-sides add to the overall richness of the woods. The moorland also supports a range of flush and fen habitats associated with bogs, cloughs, rivers and streams. Although generally small scale features they have a specialised flora and fauna, which makes a

great contribution to the overall biodiversity of the moors. Acid flushes are the most common type and these include transition mires and quaking bogs characterised by a luxuriant carpet of bog mosses *Sphagnum* spp., rushes and sedges.

5.9.2 Qualifying Features

Under Article 4(4) of the Council Directive (92/43/EEC) on the conservation of natural habitats and of wild fauna and flora as it hosts the following habitats listed in Annex I:

- Northern Atlantic wet heaths with *Erica tetralix*; Wet heathland with cross-leaved heath (JNCC Habitat code H4010);
- European dry heaths (JNCC Habitat code H4030);
- Blanket bogs* (JNCC Habitat code H7130);
- Transition mires and quaking bogs; Very wet mires often identified by an unstable `quaking` surface (JNCC Habitat code H7140) and;
- Old sessile oak woods with *Ilex* and *Blechnum* in the British Isles (JNCC Habitat code H91A0).

5.9.3 Conservation Objectives

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring:

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

5.9.4 List of operations that could potentially damage the special interests of the European Site include:

- Agricultural activities;
- Fire and Fire Prevention;
- Human induced changes in hydraulic conditions;
- Outdoor sports, leisure and Recreational Activities;
- Air Pollution and air borne pollutants.

6.0 Initial Screening Opinion

6.1 The Screening Criteria

The first stage of an HRA is a test of Likely Significant Effect (Screening of Effects). This is essentially a risk assessment to decide whether a particular Policy or site can be effectively 'Screened out' from further, more detailed assessment or needs to go forward for more detailed Assessment. The essential question to ask is:

"Is the Policy or the Site, either alone or in combination with other relevant Policies and Plans, likely to result in a significant effect upon the integrity of European sites?"

In carrying out this Screening process the Assessment has considered the main possible sources of effects on the European sites arising from the implementation of the Plan, possible pathways to the European sites and the effects on possible sensitive receptors in the European sites. Where:

- The source is the direct or indirect changes (land take, emissions to air or water, hydrological changes) potentially occurring as a result of the development at an identified site.
- The pathway is the route or mechanism by which any likely significant effect would manifest in the environment and would reach the receptor.
- The receptor is the European Site and more specifically the qualifying features and conservation objectives for the site.

Only if there is an identifiable source, a pathway and a receptor is there likely to be a significant effect.

Possible sources and pathways for (unmitigated) effects used in the screening of potential policy impacts on European sites are considered to be:

- Water Pollution via the River Mersey / Manchester Ship Canal
- Air pollution resulting from increased vehicular emissions and industry;
- Increased recreational pressure and;
- Loss and disturbance of functionally linked land.

6.2 The results of the screening are shown in the 'Screening Summary' tables below.

6.3 Each of the Policies has been assessed to determine whether they are:

- Unlikely to have an effect on a European Site – Screened Out;
- Could have a potential positive effect on a European Site – Screened Out;
- Could have a potential negative effect on a European Site – Screened In;
- Would be likely to have a significant negative effect on a European Site – Screened In.

Only Policies and Strategic Sites with potential negative effects or significant effects have been "Screened In" for further Assessment. This assessment has been made based on the content and type of each Policy and the HRA must be read together with the Plan.

6.4 The timescales over which effects (both stand-alone and in-combination) have been considered are the lifetime of the Plan and the lifetime of any proposals (including operational and restoration timescales) that may come forward during the Plan.

Table 6.1 Initial Screening Summary of impacts of the Draft Manchester Local Plan on European sites

Policies and site allocations screened into this Assessment identified in red text. Note appendices referred to under Policy description are not included.

POLICY	POLICY DESCRIPTION	POLICY TYPE*	POSSIBLE IMPACTS ON EUROPEAN SITE	SCREENING OUTCOME
Spatial Principles				
SP1	Outlines the key spatial principles which will guide the strategic development to 2040 are:	High level spatial principles	No Likely Significant Effects – Policy is high level	Screened Out
SP2	Development in all parts of the City should:- <ul style="list-style-type: none"> Consider the contribution high quality design and architecture makes to creating places where people want to live, work and visit. Contribute to the delivery of net zero carbon development. Make a positive contribution to neighbourhoods of choice including:- creating well designed places that enhance or create character and promote social cohesion. making a positive contribution to the health, safety and wellbeing of residents considering the needs of all members of the community regardless of age, gender, disability, sexuality, religion, culture, ethnicity or income. take account of the local character and history, including the surrounding built and natural environment Ensure efficient use of natural resources and reuse previously developed land wherever possible. Improve access to jobs, services, education, health services and open space by locating development to reduce the need to travel and provide good access to sustainable transport provision. Assist in the delivery of spatial interventions to address health inequalities. 	High-level spatial policy	No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.	Screened Out

POLICY	POLICY DESCRIPTION	POLICY TYPE*	POSSIBLE IMPACTS ON EUROPEAN SITE	SCREENING OUTCOME
Strategic Growth Locations				
SGL1	<p>Provision will be made for 61,000 homes, approximately 1.4 million sqm of office development including operational and administrative functions E(g)(i), research and development E(g)(ii) and industrial processes E(g)(iii) and 50,000 sqm of industrial B2 and warehousing B8 development within the City by 2040. The primary location for growth, development and investment are shown on Map 8.1 of the Plan, 'Strategic Growth Locations'</p> <p>circumstances, a strategic approach should be set out in a comprehensive framework and agreed by the Council.</p>	Strategic Growth policy	Possible impacts from increases in diffuse air and water pollution and from increases in recreational impacts	Screened In
SGL2	<p>Manchester City Centre</p> <p>The expanded City Centre is the most significant economic location outside London and will remain the primary focus for business, retail, leisure, culture and tourism activity in Greater Manchester to 2040.</p>	Strategic Growth Policy	Possible impacts from increases in diffuse air and water pollution and from increases in recreational impacts	Screened In
SGL3	<p>City Centre Areas</p> <p>Encourages regeneration and major redevelopment in various areas of the City Centre</p>	Strategic Growth Policy	Possible impacts from increases in diffuse air and water pollution and from increases in recreational impacts	Screened In
SGL4	<p>Promotes the development of the Victoria North Area, including the provision of 15,000 new homes</p>	Homes	Possible impacts from increases in diffuse air and water pollution and from increases in recreational impacts	Screened In
SGL5	<p>Promotes the development of a mixed-use area at Holt Town</p>	Strategic Growth Policy	Possible impacts from increases in diffuse air and water pollution and from increases in recreational impacts	Screened In
SGL6	<p>Promotes the development of sports and leisure facilities at Sportcity</p>	Strategic Growth Policy	Possible impacts from increases in diffuse air and water pollution and from increases in recreational impacts	Screened In
SGL7	<p>Promotes the development of employment and commercial opportunities at Central Park North</p>	Strategic Growth	Possible impacts from increases in diffuse air and water pollution and from increases in recreational impacts	Screened In

POLICY	POLICY DESCRIPTION	POLICY TYPE*	POSSIBLE IMPACTS ON EUROPEAN SITE	SCREENING OUTCOME
		Policy (employment)		
SGL8	Promotes the development of employment and commercial opportunities at Strangeways	Strategic Growth Policy (employment)	Possible impacts from increases in diffuse air and water pollution and from increases in recreational impacts	Screened In
SGL9	Promotes the redevelopment of a hospital complex at North Manchester General Hospital	Strategic Growth Policy (health)	No Likely Significant Effects	Screened Out
SGL10	Promotes the regeneration of Wythenshawe Centre and adjacent areas	Strategic Growth Policy	Possible impacts from increases in diffuse air and water pollution and from increases in recreational impacts	Screened In
SGL11	Promotes the regeneration of a hospital complex at Medipark and Wythenshawe Hospital	Strategic Growth Policy	Possible impacts from increases in diffuse air and water pollution and from increases in recreational impacts	Screened In
SGL12	Promotes the areas to the north of Manchester Airport as a significant opportunity for employment development	Strategic Growth Policy	Possible impacts from increases in diffuse air and water pollution and from increases in recreational impacts	Screened In
SGL13	Promotes the growth of Manchester Airport	Strategic Growth Policy	Possible impacts from increases in diffuse air and water pollution and from increases in recreational impacts	Screened In
Economy, Employment and Skills				
EC1	<p>Aims to build a strong, responsive and competitive economy.</p> <p>Suitable office, industrial and warehousing land will be made available to support sustainable growth, innovation and improved productivity, and enable the coordination and provision of infrastructure and digital technology. The Policy identifies key areas for new and enhanced employment provision.</p>	Economy employment and skills	Possible impacts from increases in diffuse air and water pollution and from increases in recreational impacts	Screened In

POLICY	POLICY DESCRIPTION	POLICY TYPE*	POSSIBLE IMPACTS ON EUROPEAN SITE	SCREENING OUTCOME
EC2	Economic Development Areas – identifies priority areas for economic development across the City	Economy employment and skills	Possible impacts from increases in diffuse air and water pollution and from increases in recreational impacts	Screened In
EC3	Aims to regenerate existing employment space	Economy employment and skills	No Likely Significant Effects	Screened Out
Housing and Centres				
H1	Housing provision – aims to deliver 61,000 new housing units in the Plan period across the City & prioritises locations for new homes	Homes	Possible impacts from increases in diffuse air and water pollution and from increases in recreational impacts	Screened In
H2	Affordable housing – aims to deliver affordable homes across the City	Homes	Possible impacts from increases in diffuse air and water pollution and from increases in recreational impacts	Screened In
H3	Accommodation for Gypsies and Travellers and Travelling Showpeople	Homes	No Likely Significant Effects	Screened Out
H4	Supported housing delivery	Homes	No Likely Significant Effects	Screened Out
H5	Purpose built student accommodation	Homes	No Likely Significant Effects	Screened Out
H6	Self-build and Custom Houses	Homes	No Likely Significant Effects	Screened Out
H7	Housing design	Homes	No Likely Significant Effects	Screened Out
H8	Houses in Multiple Occupation	Homes	No Likely Significant Effects	Screened Out

POLICY	POLICY DESCRIPTION	POLICY TYPE*	POSSIBLE IMPACTS ON EUROPEAN SITE	SCREENING OUTCOME
Centres				
C1	Centre Hierarchy – aims to prioritise development of town centre uses in selected areas	Centres	No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.	Screened Out
C2	City Centre Retail	Centres	No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.	Screened Out
C3	District Centres	Centres	No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.	Screened Out
C4	North Manchester District Centres – Cheetham Hill, Eastlands, Harpurhey, Newton Heath, Openshaw	Centres	No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.	Screened Out
C5	Central Manchester District Centres – Gorton, Hulme, Levenshulme, Longsight and Rusholme	Centres	No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.	Screened Out
C6	South Manchester District Centres – Baguley, Chorlton, Didsbury, Fallowfield, Northenden, Withington, Wythenshawe	Centres	No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.	Screened Out
C7	Local Centres	Centres	No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.	Screened Out

POLICY	POLICY DESCRIPTION	POLICY TYPE*	POSSIBLE IMPACTS ON EUROPEAN SITE	SCREENING OUTCOME
C8	Out of Centre Development	Centres	No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.	Screened Out
C9	Entertainment, Leisure and Food and Drink Developments – manages proposals for the enhancement and provision of cultural, entertainment and leisure F1(b, c, d, e)/ F2(c, d), food and drink E(b) and sui generis leisure (excluding hot food takeaways) uses	Centres	No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.	Screened Out
C10	Leisure and the evening economy	Centres	No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.	Screened Out
C11	Hotel and visitor economy	Centres	No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.	Screened Out
C12	Hot food takeaways	Centres	No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.	Screened Out
Zero Carbon and Resilience				
ZC1	Sustainable Design and Construction	Zero Carbon and Resilience	No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.	Screened Out
ZC2	Towards Zero Carbon	Zero Carbon and Resilience	No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.	Screened Out

POLICY	POLICY DESCRIPTION	POLICY TYPE*	POSSIBLE IMPACTS ON EUROPEAN SITE	SCREENING OUTCOME
ZC3	Renewable and low Carbon Energy Developments	Zero Carbon and Resilience	No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.	Screened Out
ZC4	Heat Networks	Zero Carbon and Resilience	No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.	Screened Out
Environment				
EN1	Strategic Green and Blue Infrastructure	Environment	No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.	Screened Out
EN2	River Valleys and Waterways	Environment	No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.	Screened Out
EN3	Trees and Woodlands	Environment	No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.	Screened Out
EN4	Biodiversity and Geodiversity	Environment	No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.	Screened Out
EN5	Biodiversity Net Gain	Environment	No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.	Screened Out

POLICY	POLICY DESCRIPTION	POLICY TYPE*	POSSIBLE IMPACTS ON EUROPEAN SITE	SCREENING OUTCOME
EN6	Urban Green Factor	Environment	No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.	Screened Out
Regulatory Environment				
EN7	Aims to improve air quality	Regulatory Environment	No Likely Significant Effect on any European Site is anticipated from the operation of this Policy. The Policy could improve designated sites.	Screened Out
EN8	Aims to improve water quality	Regulatory Environment	No Likely Significant Effect on any European Site is anticipated from the operation of this Policy. The Policy could improve designated sites.	Screened Out
EN9	Aims to reduce the risk of flooding	Regulatory Environment	No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.	Screened Out
EN10	Aims to avoid and improve ground contamination and ground stability	Regulatory Environment	No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.	Screened Out
EN11	Commits to the preparation of a new Greater Manchester Waste and Minerals Plan	Regulatory Environment	No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.	Screened Out

POLICY	POLICY DESCRIPTION	POLICY TYPE*	POSSIBLE IMPACTS ON EUROPEAN SITE	SCREENING OUTCOME
EN12	Commits to the preparation of a new Greater Manchester Waste and Minerals Plan	Regulatory Environment	No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.	Screened Out
Social Infrastructure				
SI1	Protection of existing Open Space, Sport and Recreation land and facilities The council will seek to retain and improve existing open spaces and indoor and outdoor sport and recreational land and/or facilities.	Social Infrastructure	No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.	Screened Out
SI2	Provision of new open spaces, sport and recreation land and facilities	Social Infrastructure	No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.	Screened Out
SI3	Social Value – aims to ensure that major planning proposals should seek to maximise social value provided by new development for its future users and the wider community.	Social Infrastructure	No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.	Screened Out
Transport and Digital Connectivity				
T1	Transport Principles – aims to achieve a modal shift from private vehicles to public transport, shared mobility and active travel	Transport	No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.	Screened Out
T2	Sustainable location of development	Transport	No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.	Screened Out

POLICY	POLICY DESCRIPTION	POLICY TYPE*	POSSIBLE IMPACTS ON EUROPEAN SITE	SCREENING OUTCOME
T3	Infrastructure Investment	Transport	No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.	Screened Out
T4	Digital Infrastructure	Transport	No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.	Screened Out
Design Quality and Heritage				
D1	Design Principles	Design Quality and Heritage	No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.	Screened Out
D2	Character Areas	Design Quality and Heritage	No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.	Screened Out
D3	Tall Buildings	Design Quality and Heritage	No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.	Screened Out
D4	Conservation Areas, Listed Buildings and Registered Parks and Gardens	Design Quality and Heritage	No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.	Screened Out
D5	Heritage	Design Quality and Heritage	No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.	Screened Out

POLICY	POLICY DESCRIPTION	POLICY TYPE*	POSSIBLE IMPACTS ON EUROPEAN SITE	SCREENING OUTCOME
Development Management				
DM1	Development Management	Development Management	No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.	Screened Out
DM2	Residential Extensions	Development Management	No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.	Screened Out
DM3	Flat Conversions	Development Management	No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.	Screened Out
DM4	Housing on Backland sites	Development Management	No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.	Screened Out
DM5	Shop Fronts and Related Signs	Development Management	No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.	Screened Out
DM6	Advertisements	Development Management	No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.	Screened Out

POLICY	POLICY DESCRIPTION	POLICY TYPE*	POSSIBLE IMPACTS ON EUROPEAN SITE	SCREENING OUTCOME
DM7	Aviation Noise	Development Management	No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.	Screened Out
DM8	Manchester Airport Public Safety	Development Management	No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.	Screened Out
DM9	Aerodrome Safeguarding	Development Management	No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.	Screened Out
Planning Obligations				
Policy 1	Developer Contributions	Planning Obligations	No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.	Screened Out

6.0 Summary of Policies Screened In

6.1 The following Policies have been provisionally 'Screened In' to the Assessment because it is considered that the implementation of these Policies may have harmful effects on the special interest of one or more European protected sites -

- SGL1 Strategic Growth – New Homes
- SGL2 Strategic Growth – City Centre
- SGL3 – Strategic Growth – City Centre
- SGL4 – Strategic Growth – Victoria North
- SGL5 – Strategic Growth - Holt Town
- SGL6 – Strategic Growth – SportCity
- SGL7 – Strategic Growth – Central Park North
- SGL8 – Strategic Growth – Strangeways
- SGL10 – Strategic Growth – Wythenshawe Centre
- SGL12 – Strategic Growth – Manchester Airport
- EC1 - Economy, Employment and Skills
- H1 – Housing Provision (general)
- H2 – Housing provision (affordable homes)

In general the Policies 'Screened In' relate to the aspiration for the Plan to deliver significant economic growth and significant numbers of new homes, with the City of Manchester, identified as a major economic driver for the wider North West Region. As previously stated, there are no European sites within the boundary of Manchester and direct effects on European sites will not occur.

The Policies have been Screened In because they are considered to have some potential to cause indirect effects through -

- increases in diffuse air pollution,
- increases in diffuse water pollution,
- increases in recreational pressures,
- disturbance to functionally linked land

6.2 The details of potential increases in diffuse air and water pollution and recreational disturbance and the consequent effects on European sites are difficult to empirically determine at this time and at this stage of Plan production. It is the *broad principles* of whether the scale and type of development planned for Manchester can be implemented without harming the special interest of any European Protected Sites that is being tested in this Assessment.

When preparing HRAs for projects it is normally anticipated that where developments are 'Screened In' to the appraisal they will then be subject to more detailed Assessment. This approach is often not possible for Strategic Plans, at least at this stage of Plan production, because details of particular developments and details of potential mitigation measures are not yet available. Rather, the Screening exercise provides indications of where future Assessments may need to be considered, whether Policies need to be removed from the Plan or substantially amended, and also indicates areas where future Assessments can be ruled out.

In addition, recommendations can be made at this stage about further necessary safeguards that should be incorporated into the Plan to ensure that no harm will result to European sites from the scale and type of development planned.

Taking the precautionary approach recommended in the legislation, further Screening and Assessment will be required as further stages of the Plan and as details of plan implementation become available.

6.3 There are also significant safeguards in other Policies in the Plan such that the special interest of the European sites concerned should be able to be protected and enhanced. This is a Plan with strong 'green' credentials and with sustainability at its heart.

6.3.1 Policies that have in-built measure to potentially mitigate negative effects or are Generally positive to European Sites include:

- EN1 Strategic Green and Blue Infrastructure
- EN2 River Valleys and Waterways
- EN3 Trees and Woodlands
- EN4 Biodiversity and Geodiversity
- EN5 Biodiversity Net Gain
- EN6 Urban Green Factor
- EN7 Air Quality
- EN8 Water Quality
- T1 Reduction of the use of private vehicles

6.4 The following impact pathways that could affect the integrity of European sites arising from the plan have however been identified.

- Recreational pressure – pathways to Manchester Mosses SAC (Risley Moss via car and Belford and Astley Moss on foot), Rixton Claypit SAC (by car), Sefton Coast SAC (by car/train), Rochdale Canal SAC (by boat), Mersey Estuary (car) South Pennines SPA/SAC (by car); Martin Mere SPA/Ramsar (by car).
- Air quality – vehicular pathway to Manchester Mosses SAC (primarily to Holcroft Moss which is adjacent to the M62 motorway) and Rixton Claypit SAC;
- Water quality – pathway via the River Mersey and the Manchester Ship Canal to Mersey Estuary SPA/Ramsar site
- Currently there is insufficient evidence to determine whether or not functionally linked land or water is present in Manchester for qualifying species associated in particular with the Mersey Estuary SPA/Ramsar sites. However taking a precautionary approach this potential LSE is Screened In.

6.5 A stage 2 Appropriate Assessment is therefore required of the potential LSE identified.

7.0 Appropriate Assessment

7.1 The screening process identifies the following sources of likely significant effect on European sites and functionally linked land:

- Air quality from traffic emissions (Manchester Mosses SAC, Rixton Clay Pits SAC, South Pennine Moors SAC)
- Recreational disturbance (all screened-in sites & functionally linked land);
- Water quality (Mersey Estuary SPA/Ramsar);

- Direct loss of functionally linked land (Mersey Estuary SPA/Ramsar).

7.2 Air Quality

- 7.2.1 The air pollutants most likely to have a significant effect on European sites are the oxides of nitrogen (NO_x) resulting from traffic emissions. Modern regulation of commercial emissions makes any other form of air pollutant extremely unlikely.
- 7.2.2 NO_x deposition results in an increase in nitrates and can have a significant impact on certain habitats including lowland mosses and upland blanket bogs. Open water habitats can also be susceptible where the importance is linked to low nutrient levels in the water.
- 7.2.3 NO_x can also impact existing vegetation by lowering the pH ie acidification analogous to the acidification caused by high levels of SO₂ to the South Pennines from coal fires.
- 7.2.4 Studies indicate that the main impact of NO_x is when within 200m of a pollution source ie road or major transport depot.

Manchester Mosses SAC

- 7.2.5 This habitat type is considered sensitive to changes in air quality, especially acidity and nitrogen. Critical values are currently being exceeded at this SAC (APIS, 2016).
- Exceedance of these critical values for air pollutants may modify the chemical status of its substrate, accelerating or damaging plant growth, altering its vegetation structure and composition and causing the loss of sensitive typical species associated with it.
- 7.2.6 The part of this SAC most at risk is Holcroft Moss as it lies immediately adjacent to the M62 with an estimated 129,000 vehicle movement per day between the M6 and M60 in 2024. As the critical nitrogen and NO_x levels are already regarded as above the critical load for the Manchester Mosses, theoretically any increase in road traffic along the M62 as a result of the operation of the Manchester Local Plan could have a negative impact on this part of the SAC. Both Risley Moss and Bedford Moss are located at significant distance from any trunk road and are unlikely to be impacted upon by traffic issues originating as a result of the Plan.
- 7.2.7 Policies promoting the economic growth of Manchester and housing growth could theoretically increase traffic levels on this section of the M62 to and from Manchester. Policies screened-in include:
- 7.2.8 Air quality modelling was undertaken for the Places for Everyone large scale strategic plan for Greater Manchester. This modelling concluded that developments within Greater Manchester (including Manchester) when acting in combination with developments in Warrington could cause LSE on Holcroft Moss by increasing emissions from traffic flow along the M62. In response to this identified LSE mitigation for air quality impacts was proposed in the form of a Supplementary Planning Document "*Holcroft Moss Planning Obligations Joint Supplementary Planning Document – May 2025*" by the nine Places for Everyone authorities and Warrington in consultation with Natural England.
- 7.2.9 This SPD provides guidance on when mitigation in the form of developer contributions to the positive management of the Manchester Mosses SAC will be required for Holcroft Moss as a result of additional vehicle movements along the M62 corridor past Holcroft Moss. (between junction 11 Birchwood and Junction 12 Worsley). The triggers are 100 vehicles or 20 HGV's per day.

7.2.10 As Manchester has already signed up to this SPD with regards its Places for Everyone Plan, and the PfE plan has already accounted for the quantum of development anticipated for Manchester up to 2039, it is reasonable to use the same criteria to assess allocations under the Manchester Local Plan. Any development likely to increase traffic in excess of 100 vehicles or 20 HGV's should there provide mitigation as agreed in the SPD. Taking this into account,

Rixton Clay Pits SAC

7.2.11 The supporting freshwater and terrestrial habitat of this feature is considered sensitive to changes in air quality. There may be critical levels for ammonia (NH₃), oxides of nitrogen (NO_x) and sulphur dioxide (SO₂), and critical loads for nutrient nitrogen deposition and acid deposition.

7.2.12 Rixton Clay Pits is immediately adjacent to the A57, Manchester Rd linking Junction 21 on the M6 (Warrington north) to the M60 with employment sites such as Northbank Industrial Park in Irlam and Port Salford, located along the Manchester Rd. Some vehicular movements originating in Manchester will therefore occur.

7.2.13 Other assessments have concluded that APIS indicates that it is not clear whether critical loads for overall nitrogen are being exceeded, assuming the habitats are relatively base rich, as a range of critical loads is given. Nitrous oxides are probably below critical loads. Natural England also does not currently list air quality as a concern for this SAC.

7.2.14 Air quality modelling and assessment for the Warrington Local Plan by AECOM (March 2023), concluded that there were no likely significant effects resulting from vehicle generated air quality issues to Rixton Claypits SAC, the vegetation in ponds being phosphate limited as opposed to nitrogen limited. They also concluded that the qualifying species great crested newts, were very unlikely to be affected by increased nitrogen deposition. The Warrington Local Plan has since been adopted and the HRA accepted by Natural England.

7.2.15 Given that the Manchester Local Plan will have a significantly lower impact on the level of traffic on the A57 than the Warrington Local Plan which concluded increased road traffic would not have a significant effect on the qualifying species for the Rixton Clay Pits SAC it is reasonable to conclude no likely significant effect will occur to Rixton Clay Pits SAC from any reduction in air quality resulting from the Manchester Local Plan.

South Pennine Moors SPA & SAC

7.2.16 As with the Manchester Mosses SAC habitats within the above SAC are known to be particularly susceptible to nitrogen inputs, and in places on the Moors nitrate loads are known to exceed critical thresholds for harm (given as 5-10 kg N/ha/yr for blanket bog, *source – Apis*).

7.2.17 The M62 crosses the Pennines running close to sensitive habitats and takes a significant amount of traffic from Greater Manchester. Traffic modelling (screening) undertaken to inform the Places for Everyone Plan has identified that the Plan may cause effects on the South Pennine Moors Phase 1 European site from increased traffic flows.

7.2.18 Development in Manchester will be contributing towards this, particularly employment sites, reliant on freight transport using HGV's to source materials and distribute their products.

7.2.19 However Places for Everyone has not identified any strategic allocations within Manchester as having likely significant effects on the South Pennines SAC/SPA and concluded that the overall Plan would not have any likely significant effects on the SPA.

It is therefore reasonable to conclude no likely significant effect will occur to South Pennine Moors SPA/SAC from any reduction in air quality resulting from the Plan in isolation.

7.3 Recreational Pressure

7.3.1 The impact of recreational pressure varies dependent on the habitat and the qualifying species, some habitats being quickly physically damaged by trampling, other sensitive to nutrient inputs from dog fouling and other holding qualifying species sensitive to disturbance.

7.3.2 The likelihood of recreational pressure also varies depending on the nature of the site, with coastal or upland habitats likely to attract recreational visits from a greater distance than other habitats and sites promoted as recreational destination, likely to attract visitors from even greater distance Those with no official public access or deemed as potentially dangerous are only likely to attract local residents and naturalists.

Manchester Mosses SAC

7.3.3 Mosslands are habitats that do not normally attract significant recreational visits owing to being waterlogged and difficult to walk over. There is also the public perception that such sites are dangerous. Currently there is no public access to Astley and Bedford Mosses or Holcroft Moss, with Risley Moss managed by rangers employed by Warrington Borough Council.

7.3.4 Of the distinct parts to the Manchester Mosses SAC, Astley and Bedford Mosses is more than 13km from the boundary with Manchester, with Holcroft Moss and, Risley Moss located more than 10km respectively as the crow flies to the nearest point of the City.

7.3.5 Given the above factors it is considered that no Likely Significant Effects will be caused by increased recreational development arising from development in Manchester.

Rixton Clay Pits

7.3.6 As Rixton Clay Pits is over 10km from Manchester at its closest point, *and* is managed as recreational open space, *and* the qualifying species, great crested newt, not regarded as particularly sensitive to recreational disturbance it is reasonable to conclude no likely significant effects on Rixton Clay Pits SAC from recreational pressure arising from development in Manchester.

Mersey Estuary SPA and Ramsar Site

7.3.10 The qualifying species of the Mersey Estuary SPA a range of waders and wildfowl are regarded as sensitive to recreational pressure. Guidance from Natural England is that coastal sites within 10km should be screened in. The Mersey Estuary is over 20km from the Manchester border, and whilst the site is in part coastal, would not normally be regarded as more than a local visitor destination. It was also not screened in for recreation as part of Places for Everyone, with no objection from Natural England.

It is therefore reasonable to conclude no likely significant effects on the Mersey Estuary SPA/Ramsar from recreational pressure.

Sefton Coast

7.3.11 The Sefton Coast is a regionally important visitor destination that includes Southport and Formby. It is therefore likely that day trips by residents of Manchester to these

locations will occur, given the journey time by car is only around 40 minutes and there are direct train services.

7.3.12 Research for the Sefton Local Plan in 2008, found that approximately 50% of visitors were local with a further 17% from other parts of Merseyside. 50% of visits were by dog walkers, with 20% visiting for nature based reasons. The majority of visitors were focused on Formby and Crosby. This is in line with research by Footprint Ecology in 2020 for Natural England, on the NW coastline, which included the Sefton Coast where 75% of visitor lived with 5.2km of the coast and Formby was identified as the most visited location of the sites surveyed. 63% of visitors were dog walkers. Interviews with visitors identified no visitors from Manchester, with 95% of day visitors travelling less than 15km. However, visitors from localities of similar distance to parts of Manchester were encountered.

7.3.13 The Sefton Coast Management Scheme established in 1978, co-ordinates nature conservation and recreational issues along the Sefton Coast including the Ribble & Alt Estuaries from Crosby in the south to north of Southport. To date this scheme has worked adequately ie balanced the nature conservation and recreational issues. However the Sefton Local Plan concluded that additional recreational pressure from development would need to be accompanied by an HRA and potentially provide recreational mitigation.

7.3.14 A joint SPD titled Liverpool City Region and West Lancs Joint recreation mitigation strategy went out for public consultation in 2023, with Sefton Council as the lead. One objective of the SPD is to protect the European designations from recreational pressure. The web link is however currently inactive, with no evidence that the SPD was ratified. An interim advice note produced by Sefton Council requires recreational contributions based on distance of development from the Sefton Coast. The Central Lancashire Plan HRA noting the inner zone being set at 5km and outer at 11.5km. As a consequence, the Central Lancashire authorities have taken a precautionary approach and screened in any development within 15km of the coast. Manchester is more than 50km from the Sefton Coast

7.3.15 On balance given the majority of visitors are:

- local with the percentage of visitors from Manchester that make up the remaining visitors likely to be below 1%,
- a visitor management strategy is currently in place that is regarded as coping and
- the nearest allocations are over 50 km from the coast,

It is reasonable to conclude that no likely significant effects on the Sefton Coast from recreational pressure originating from Manchester in isolation will occur.

Martin Mere SPA/Ramsar

7.3.14 Martin Mere SPA/Ramsar is managed as a regionally important visitor destination. Residents of Manchester will visit this site. It should be noted Martin Mere was a visitor destination prior to its designation as an SPA.

7.3.15 The West Lancashire Plan HRA, in which Martin Mere SPA/Ramsar is located, screened out recreational disturbance because the site was actively managed as a visitor destination. The Sefton Local Plan HRA notes that Natural England accepted that recreational disturbance of Martin Mere SPA could be screened out.

7.3.16 It is therefore concluded that no likely significant effects on Martin Mere SPA/Ramsar from recreational pressure will occur as a result of recreational pressure originating from Manchester.

Rochdale Canal SAC

7.3.17 The Rochdale Canal supports important populations of aquatic plants which can be harmed by increases in boat traffic. Development within Manchester could attract more boat movements along the Canal to and from the City. However, the Canal and River Trust own and manage the Canal and control boat movements along the Canal. The Canal is managed with its important nature conservation value borne in mind. Populations of important plants are monitored and measures can be implemented to restrict boat movements should harm be recorded.

7.3.18 It is concluded that recreational impacts on the Canal SAC arising from increased boat movements can be Screened Out of the assessment.

7.4 Water Quality

7.4.1 Negative effects on European sites can be due to a lowering of water quality ie pollution leading to higher mortality of qualifying species, food sources they are reliant on or through accumulation of pollutants; changes in nutrient status such as raised levels of nitrate or phosphate, leading to a change in the vegetation structure of the European site and potentially any qualifying species and; changes in water clarity through increase sediment load or increase levels of algae in the water.

7.4.2 Generally for such an impact to occur there needs to be a hydrological pathway such as a water course or ground water. European sites with direct hydrological connectivity to Manchester include the Mersey Estuary SPA/Ramsar.

Mersey Estuary SPA and Ramsar Site

7.4.9 The Mersey Estuary is hydrologically linked to Manchester via the River Mersey and the Manchester Ship Canal.

7.4.12 The Mersey Estuary SPA and Ramsar are around 30 km downstream of Manchester, with the estuary subject to very large water flows each day owing to the ebb and flow of the tide. (a dilution factor, estimated in the Warrington Local Plan HRA at 5 million cubic meters of water between Warrington and the SPA) It also receives drainage from the majority of the other districts in Greater Manchester, Merseyside, Warrington and parts of Cheshire.

7.4.13 Water flows along the Manchester Ship Canal are controlled to a certain extent by a series of locks. These have the effect of slowing water flows, with the result that some pollutants will be deposited before they reach the Estuary.

7.4.14 Currently the effect of water quality on the SPA is not recorded as a significant risk on the standard data form for the site or an issue raised by the most recent site improvement plan. The Mersey Estuary SPA/Ramsar was also not listed in the open letter to LPA's dated 16th March 2022, regarding protected sites at risk from negative water quality effects resulting from nitrates and phosphates, where additional assessment would be required.

7.4.15 It is concluded from the above, that despite the existence of a pathway, the distance from the Mersey Estuary, combined with water quality not been regarded as a significant risk by Natural England, the relative proportion pollution generated by Manchester compared to the entire catchment, and the policies in place to safeguard the water environment, that there will be no likely significant effects as a result of water borne pollutants arising from the Manchester Local Plan in isolation on the conservation status of the Mersey Estuaries SPA/Ramsar.

7.6 Direct loss of disturbance of Functionally Linked Land with the City.

- 7.6.1 Functionally linked land is land utilised by significant numbers of the qualifying species associated with a European site on a regular basis that is not part of the European site.
- 7.6.2 This most often applies to sites where birds are the qualifying species and forage or roost off-site. It could also apply to great crested newts that may move off-site in the winter to hibernate or to forage.
- 7.6.3 With regards to the Draft Manchester Local Plan, only birds are screened in as whilst Rixton Clay Pits and the Sefton Coast include great crested newts as qualifying species both are too distant from the City for any possibility of a likely significant effect.
- 7.6.4 Of the qualifying bird species associated with the Mersey Estuary SPA/Ramsar (which is over 30km away from Manchester) only Pink-footed geese are known to use land up to 20km from their main wintering grounds with curlew and golden plover, known to use land up to 15km from the main roosting sites. Whooper and Bewick Swans have also been considered, but the ranges of these birds to use functionally linked land is less than 30 km.
- 7.6.5 Whilst golden plover are a qualifying species for the Mersey Estuary SPA/Ramsar as wintering bird, as the City is over 30km from this estuary the risks are low and a data search for golden plover found no significant counts. Pink-footed geese are not a qualifying species for the Mersey Estuary SPA/Ramsar.
- 7.6.6 It is therefore concluded that no land functionally linked to the Mersey Estuary will occur in Manchester.

8.0 Consideration of 'In Combination' Effects with Other Plans and Proposals

- 8.1 The Habitats Regulation Assessment must consider the likely significant effect of the Plan in relation to other proposals and plans current or planned within the relevant administrative area, other administrative authorities and prepared by other statutory organisations (e.g. Environment Agency, United Utilities) and in combination with the identified effects of those Plans.

Cumulative effects for air quality, recreational pressure, water quality, hydrology and indirect effects on functionally linked land have been considered. There are no cumulative effects for direct loss of functionally linked land.

8.2 Air Quality

Rixton Clay Pits SAC

- 8.2.1 Whilst potential cumulative impacts could occur to Rixton Clay Pits SAC, both the Warrington Local Plan HRA and Places for Everyone HRA, screened out Rixton Claypits at stage 1 of the HRA process. I am therefore satisfied that there are no likely significant effects in isolation or in-combination to Rixton Clay Pits SAC, resulting from air quality impacts arising in Manchester.

South Pennines SPA/SAC

- 8.2.2 Places for Everyone concluded that the cumulative impact of the Plan could result in slight increases in airborne pollution to parts of this extensive site along the A6024, A627 and A57. The A57 and A6024 are the Snake and Woodhead Passes across the Pennines with no significant pathways from the City of Manchester. The negative effects also primarily relate to impacts on qualifying species. Contributions to cumulative effects from Manchester are screen out for these two roads.
- 8.2.3 The A627 links Oldham to the M62 at junction 22 with negative effects linked to the A627 around the motorway junction but due to traffic on the A627 as opposed to the M62. This apparent anomaly is presumably due to the A627 actually falling within the SAC/SPA, whereas the M62 with a moderate buffer of around 50m either side excluded from the SPA/SAC. It is very unlikely that traffic generated in Manchester would primarily utilise the A627 as the M62 would be a more direct route to Oldham or over the Pennines.
- 8.2.4 I am therefore satisfied that there are no likely significant in-combination to the South Pennines SAC/SPA as a resulting from traffic generated by the Draft Manchester Local Plan.

Manchester Mosses SAC

- 8.2.5 Places for Everyone screened in air quality for the Manchester Mosses SAC, accepting that critical loads were already breached for Holcroft Moss and that the additional development across the nine PFE and Warrington Districts would add to this. The Warrington Local Plan also screened in the Manchester Mosses SAC because of additional traffic movements past Holcroft Moss. The Draft Manchester Local Plan will add further traffic movements. There is therefore the potential for a likely significant effect in-combination with the development proposals within Places for Everyone and the Warrington local plan as well as other local plans in preparation across Greater Manchester.
- 8.2.6 However as noted in sections 7.2.8 – 7.2.10 an SPD has been produced which provides measures to mitigate for the increased traffic movements resulting from development proposals in Places for Everyone and the Warrington Local Plan. As Manchester has signed up for this SPD, which has been agreed with Natural England as long as the agreed measures in the SPD are applied to all development in Manchester no likely significant effects will occur.

8.3 Recreational Pressure

- 8.3.1 Whilst increased recreational pressure due to visitors from Manchester has been screened out, as having no likely significant effects on any European sites in isolation, this does not mean that in combination with other plans that a significant effects could not occur.
- 8.3.2 The sites with pathways from Manchester that were discussed in section 7.3 included, Rixton Clay Pits, the Manchester Mosses SAC, Martin Mere SPA/Ramsar, Mersey Estuary SPA/Ramsar, and Sefton Coast SAC and as well as functionally linked land. The most relevant in-combination plans are Places for Everyone; other GM District Local Plans, Warrington Local Plan, St Helen's Local Plan, West Lancs Local Plan, Sefton Local Plan and Central Lancashire Local Plan.

Manchester Mosses SAC

- 8.3.3 The most relevant in-combination effects will be as a result of development resulting from Places for Everyone and the Warrington Local Plan, both of which include parts of

the Manchester Mosses SAC, within the geographic area covered by the Plans. All other Plans are reasonably discounted given the lack of access to and the management measures and distance from any other development in place at Risley Moss.

8.3.4 Places for Everyone concluded no likely significant effect as a result of recreational access, with Natural England commenting in September 2020 that:

"We are not concerned about an increase of recreational pressure on these sites as there is a lack of public access. The HRA does not need to try and assess the impacts of possible increased illegal activity"

8.3.5 The Warrington Local Plan also concluded no likely significant effects on the Manchester Mosses SAC as a result of recreational disturbance.

8.3.6 I am therefore satisfied that there are no likely significant effects to the Manchester Mosses SAC as a result of recreational disturbance in isolation or in combination with the Draft Manchester Local Plan.

Rixton Clay Pits SAC

8.3.7 The most relevant in-combination effects will be as a result of housing development proposed by the Warrington Local plan as the SAC lies within in that Borough. Housing development proposed in Places for Everyone, the Salford Local Plan and Trafford Local Plan all of which a geographically closer than Manchester to Rixton Clay Pits SAC are also considered. All other plans are reasonably discounted given the distance of housing developments proposed within such plans from Rixton Clay Pits SAC.

8.3.8 Places for Everyone concluded no likely significant effect as a result of recreational access, in-combination with other plans, concluding that:

"Visitors to the site tend to be very local (source – Warrington BC). There is a comprehensive management plan in place for the site which includes the management of visitor access, and the site is actively managed for visitors by Warrington Council. Conclusion - there are sufficient safeguards in place to ensure that the Places for Everyone will not cause harm to Rixton Claypits through increases in recreational disturbance."

8.3.9 The Warrington Local plan HRA also concluded no likely significant effects from in-combination recreational pressures to Rixton Clay Pits SAC, when assessed in combination with adjacent authorities including Manchester, Salford, Trafford, Cheshire East, Cheshire West and Halton. the Trafford Local Plan HRA 2020 also identified no in-combination effects. The Salford Local Plan HRA (2019) did not consider in-combination effects to Rixton Clay Pits SAC.

8.3.10 I am therefore satisfied that there are no likely significant in-combination to the Rixton Claypits SAC as a result of in-combination recreational disturbance with the Draft Manchester Local Plan.

Martin Mere SPA/Ramsar

8.3.11 The most relevant in-combination effects will be as a result of housing development proposed in the West Lancashire Local Plan, the district in which the SPA lies. Other relevant local plans with closer or similar connectivity to this European site include the Sefton Local Plan, Knowsley Local Plan, St Helens Local Plan and Central Lancashire Local Plan as well as Places for Everyone.

- 8.3.12 The West Lancashire Local Plan screened in disturbance as having a likely significant effect on Martin Mere SPA/Ramsar as a result of the West Lancs plan in isolation and therefore by default in-combination with neighbouring authorities. This was however precautionary as the HRA was carried out on policies only and not allocations. The likely significant effect was also only with respect to noise and visual disturbance during construction. Recreational disturbance was screened out based on the existing visitor management.
- 8.3.13 The Central Lancashire Plan HRA discounted direct likely significant effects for the same reasons as West Lancs ie visitor management by the Wildfowl and Wetland Trust despite allocations within 7km of the site.
- 8.3.14 The Sefton Local Plan HRA (2016), screened Martin Mere out at stage 1 as whilst within 5km they quote a ruling by Natural England on the St Helen's Core Strategy that recreational management at Martin Mere was such that it could be screened out. As noted the St Helens Plan HRA (2016) also screened Martin Mere out for direct recreational disturbance. The Knowsley Local Plan HRA (2012) also screened out recreational disturbance.
- 8.3.15 I am therefore satisfied that there are no likely significant in-combination to the Martin Mere SPA/Ramsar as a result of in-combination recreational disturbance with the Draft Manchester Local Plan.

Sefton Coast SAC

- 8.3.16 The Sefton Coast SAC is susceptible to recreational disturbance primarily as a result of trampling of the qualify habitats and because of disturbance to the qualify bird species.
- 8.3.17 The most relevant in-combination effects will be as a result of housing development proposed in the borough of Sefton, the district in which the SAC primarily lies. Other relevant local plans with closer or similar connectivity to this European site include the West Lancs Local Plan, Knowsley Local Plan, St Helens Local Plan and Central Lancashire Local Plan as well as Places for Everyone.
- 8.3.18 Sefton Council, West Lancs Council and the Merseyside districts have screened in likely significant effects and are currently according to planning policy pages producing a joint SPD to provide guidance on recreational contributions for the management of coastal habitats.
- 8.3.19 The Central Lancashire Local Plan has also screened in potential in-combination effect to the Sefton Coast SAC, noting that whilst guidance on the zone of influence is still to be determined, as the majority of the development is proposed within 15km of the coast in the Central Lancashire Local Plan, the precautionary approach should be taken. They have therefore screened in all housing development up to 24km from the coast.
- 8.3.20 Places for Everyone screened the Sefton Coast SAC out at stage 1.
- 8.3.20 No developments within Manchester are located within 15km of this coastal European site.
- 8.3.21 I am therefore satisfied that there are no likely significant in-combination to the Sefton Coast SAC and Ribble & Alt Estuaries SPA/Ramsar as a result of in-combination recreational disturbance with the Draft Manchester Local Plan that are not nugatory.

Mersey Estuary SPA/Ramsar

- 8.3.22 The most relevant in-combination effects, for comparison will be as a result of housing development proposed in the boroughs Warrington, St Helens and Places for Everyone as these Plans are located closer to the Mersey Estuary. Other relevant local plans with recreational pathway to this European site include Liverpool, Halton, St Helens, and Cheshire West, Salford and Trafford Local Plans.
- 8.3.23 Places for Everyone screened the Mersey Estuary SPA/Ramsar out at stage 1 for recreational disturbance and did not consider in-combination effects.
- 8.3.25 The Warrington Local Plan HRA screened the Mersey Estuary in at stage 1 but concluded no likely significant effect as the nearest accessible part of the SPA was over 10km from the nearest housing allocation in the borough.
- 8.3.26 The nearest developments within Manchester are more than 30km from the SPA/Ramsar.
- 8.3.27 I am therefore satisfied that there are no likely significant in-combination effect to the Mersey Estuary SPA/Ramsar as a result of in-combination recreational disturbance with the Draft Manchester Local Plan that are not nugatory.

8.4 Water Quality

- 8.4.1 Whilst deterioration due to pollutants originating from Manchester has been screened out as having no likely significant effects on any Europeans sites, this does not mean that in combination with other plans could not result in significant effects occurring.
- 8.4.2 The sites with pathways from Manchester that were discussed in section 7.4 included, Manchester Mosses SAC and the Mersey Estuary SPA/Ramsar.

Manchester Mosses SAC

- 8.4.3 Salford City and Warrington Borough are both located within 800m of Astley & Bedford Mosses, with Places for Everyone overlapping with the Manchester Local Plan. All other Plans can be screened out as having in-combination effects owing to a lack of pathways for surface or groundwater to Astley & Bedford Mosses. There are also no surface water pathways from Warrington which would act in combination with the Manchester Plan. The situation is less clear with regards surface water connectivity to Salford with an extensive network of drains located throughout the mossland between Salford and Astley & Bedford Mosses.
- 8.4.4 With regards to groundwater, Natural England's peat layer indicates peat extending from Astley & Bedford Mosses south and east into Salford. There is no connectivity through to Warrington, with peat maps indicating no peat to west of Astley & Bedford Mosses and the Glaze Brook acting as a barrier to groundwater movement via peat.
- 8.4.5 In-combination effects with Warrington can therefore be screened out based on a lack of pathways.
- 8.4.6 Places for Everyone did not screen in the Manchester Mosses SAC for potential significant effects owing to a reduction in water quality as no pathways existed from the major developments proposed in Salford or other districts. I am therefore satisfied that in-combination effects with Places for Everyone can be screened out.
- 8.4.7 The developing Salford Local plan also has no allocations on the moss in proximity to Astley & Bedford Mosses, the nearest proposed allocation Land off Heyes Road in Cadishead, not hydrologically linked and 5km from the Astley & Bedford Mosses.

8.4.8 I am therefore satisfied that there are no likely significant in-combination effects to the Manchester Mosses SAC as a result of in-combination water quality issues with the Draft Manchester Local Plan.

Mersey Estuary SPA/Ramsar

8.4.9 A large number of local authorities have the potential to have a significant effect on the Mersey Estuary SPA/Ramsar, primarily as a result of water pollutants and sediment entering the catchment that drains into the Mersey Estuary, including the majority of Merseyside authorities, parts of Cheshire West, parts of Cheshire East, all of Greater Manchester authorities, Warrington and Rossendale.

8.4.10 Of these, the Merseyside authorities, parts of Cheshire West and Warrington are closer to the Mersey Estuary than Manchester, as are parts of Salford.

8.4.11 Places for Everyone screened-in cumulative effects as whilst noting the distance downriver at the nearest point was around 15km, the scale of the development proposed in Places for Everyone was such that the contribution towards the overall input of pollutants was such that it could be significant. This related primarily to diffuse pollution ie pollution that cannot be attributed to any one source.

8.4.12 The Warrington Local Plan however screened the Mersey Estuary SPA/Ramsar out at stage 1 owing to the distance down river from Warrington. Approximately 7km.

8.4.13 The St Helen's Local plan however notes in-combination effects could occur, in particular with Warrington and Manchester, if adequate policy was not in place, with the main pathway the Sankey Brook already polluted and supplying approximately 10% of water to the Estuary. The plan also noted that the St Helen's sewage works also discharged into the Sankey Brook with the HRA recommending the LPA worked with United Utilities Ltd to ensure adequate capacity in the sewage works was available prior to development coming forward. If this sewage works was not capable of accommodating the new development there could be an increased levels of diffuse pollution.

8.4.14 The Halton Local plan also identified potential in-combination effect as it lies adjacent to the SPA, though concluded it was unlikely, subject to more information that the plan alone would have significant impacts as there was adequate capacity in the drainage system to accommodate the development. It did however conclude there may be in-combination effects from development upstream as far as the Irwell catchment.

8.4.15 The operation of Policy EN8 would mitigate any water pollution impacts

8.4.16 On balance given the lack of agreement between Local Plans on the potential for an in-combination likely significant effect on water quality, and notwithstanding the policies to protect watercourses in the draft plan, I recommend that a precautionary approach is taken in line with the recommendations of Places for Everyone, the St Helens and Halton Local Plans and additional commitment added to the Manchester Plan to require development proposals to be considered with respect to the capacity within the relevant Waste Water Treatment Works. Once this additional safeguard is in place, I would be satisfied that no likely significant in-combination effects will occur as a result of development managed by the Draft Manchester Local Plan.

8.6 Indirect effects on Functionally Linked Land

8.6.1 Whilst no functionally linked land has been identified in Manchester, it is theoretically possible that recreational disturbance resulting from an increased population in the

Manchester could have a likely significant effect on functionally linked land located in adjacent districts that are closer to the European sites discussed in section 7.6, including Martin Mere SPA/Ramsar, and the Mersey Estuary SPA/Ramsar. The relevant districts are West Lancs, St Helen's and South Ribble.

- 8.6.2 The St Helens Local Plan notes that research by MEAS has identified that land in St Helens is functionally linked for whooper swan, Bewick swan and pink-footed geese, all qualifying species for Martin Mere SPA/Ramsar. These species are associated primarily with arable farmland.
- 8.6.3 The adjacent land in St Helens is however over 25km from Martin Mere SPA/Ramsar, significantly further than the normal zone of influence that whooper swan, Bewick swan and pink-footed geese would be screened in. It is also noteworthy that for nearby Parkside Colliery development in St Helens, neither Natural England or MEAS raised the issue of functionally linked land.
- 8.6.4 The Warrington Local Plan identifies Arpley Meadows as likely functionally linked to the Mersey Estuary SPA/Ramsar. These fields are located between Moore and Walton, to the SW of Warrington, more than 25km from Manchester.
- 8.6.5 I am therefore satisfied that there are no likely significant in-combination effect to the functionally linked land as a result of in-combination disturbance with the Draft Manchester Local Plan

9.0 Summary and Recommendations

9.1 Stage 1 of the appropriate assessment of European sites established that there were pathways to the following European sites that could transport potential effects generated by the Manchester Borough Local Plan: Draft Consultation:

- Manchester Mosses SAC
- Rixton Clay Pits SAC
- Rochdale Canal SAC
- Mersey Estuary SPA/Ramsar
- South Pennine Moors SPA/SAC
- Martin Mere SPA/Ramsar
- Sefton Coast SAC

Rostherne Mere Ramsar was screened out at stage 1 because there was no clear identified pathway to this site.

9.2 Further, more detailed Assessment of the possible effects of the operation of Policies on the European Sites identified in the Screening process has been undertaken.

9.3 A number of the Policies within the Plan were initially identified as potentially having a likely significant effect on European Sites and functionally linked land due to one or more of the following:

- Water Pollution via the River Mersey / Manchester Ship Canal;
- Air pollution resulting from vehicular emissions and industry;
- Increased recreational pressure *and*;
- Loss of functionally linked land.

9.4 Following further assessment, stage 2 of the HRA, the following European sites remain screened in:

- Manchester Mosses SAC (air quality)
- Mersey Estuary SPA/Ramsar (water quality)

9.5 It was concluded that development managed by the Manchester Draft Local Plan, have the potential to cause significant effects on the Manchester Mosses SAC and Holcroft Moss in particular, alone and in-combination with allocations in Places for Everyone and Warrington resulting from air quality issues generated by vehicular movements along the M62 between the M6 and the M60.

A joint SPD, has already been produced between the PfE authorities, which includes Manchester, to mitigate this LSE. As long as the SPD (or future updates) are applied to the developments within Manchester, adequate mitigation for likely significant effects arising from diffuse air pollution is available.

9.6 Developments within Manchester have the potential to cause Likely Significant Effects on the Mersey Estuary SPA/Ramsar resulting from diffuse water pollution when considered in combination with allocations in Places for Everyone, St Helens, Halton and Warrington. Whilst policies within the Plan will provide a level of mitigation, both the St Helen and PfE plans questioned the capacity within existing waste water treatment works which requires further investigation with United Utilities Ltd. We recommend that development proposals are considered with respect to the capacity within the relevant Waste Water Treatment Works.

9.7 Other European sites screened in at stage 1 have been Screened Out following further assessment for likely significant effects. These include:

- Sefton Coast SAC
- Rochdale Canal SAC
- Martin Mere SPA/Ramsar
- Rixton Clay Pits SAC
- South Pennines SPA/SAC *and*
- Functionally linked land.

9.8 If the recommended mitigation measures proposed with regards to air quality and water quality are implemented, the policies in the Plan will have no effect on the integrity of the Manchester Mosses SAC or Mersey Estuary SPA/Ramar.

9.9 It is **recommended** that if any changes are made to the Policies in the Plan as a result of either the public consultation or during the Examination in Public, the Holcroft Moss SPD is amended or withdrawn or new data come forward on qualifying species, water quality or impacts of recreation then the HRA will need to be revisited and revised to ensure that these changes would not result in a significant effect on any European Sites.

References

1. Warrington Borough Council Updated Proposed Submission version Local Plan: Amended HRA – August 2021 AECOM
2. Habitats Regulations Assessment of the Places for Everyone Joint Development Plan (submission) – February 2022 – GMEU
3. Habitats Regulations Assessment of the Impact on European Protected Sites of Salford Local Plan: Development Management Policies and Designations – Dec 2019 – GMEU
4. Habitats Regulations Assessment of the Impact on European Protected Sites of Trafford Local Plan: First Draft Consultation – Dec 2020 – GMEU
5. St Helens Local Plan 2018 – 2033 Preferred options, Habitat Regulation Assessment – December 2016 – AECOM.
6. Habitats Regulation Assessment of the West Lancashire Local Plan – June 2021 AECOM
7. Habitats Regulation Assessment of the Proposed Modifications to Sefton Local Plan – May 2016 AECOM
8. Information Note: Managing and mitigating the impact of recreation pressure on the Sefton Coast – Sefton's Interim Approach for housing development – May 2023 Sefton Council
9. Central Lancashire Local Plan: Habitats Regulations Assessment Report, Screening and Appropriate Assessment January 2025 LUC
10. Holcroft Moss Planning Obligations Joint Supplementary Planning Document May 2025
11. South Pennine Moors SAC/SPA Joint Supplementary Planning Document May 2025
12. Annual Lockage Report 2024 - Canal & River Trust 2025
13. Recreational activity and interactions with birds within the SSSIs on the NW coast of England - Footprint Ecology, 2017
14. Habitats Regulations Assessment of the Impact on European Protected Sites of Manchester Council's Core Strategy (Proposed Submission Version) GMEU 2011

Appendix 1 – Location of European Sites

Figure 1 – Location of European Sites within 25 km of Manchester

Location of European Sites within 25 km of Manchester are:

- **Rochdale Canal SAC**
- **Manchester Mosses SAC**
- **Rixton Claypits SAC**
- **Peak District Moors SAC/SPA**
- **South Pennine Moors SPA/SAC (part of)**

Locations of European Sites outside the 25 km area are:

- **South Pennine Moors SPA/SAC (part of)**
- **Mersey Estuary SPA**



