



The Ecology Co-op

ENVIRONMENTAL CONSULTANTS

Unit 4, Langham Stables, Langham Lane, Lodsworth, Petworth, West Sussex, GU28 9BU

Tel: 01798 861 800 – E-Mail: info@ecologyco-op.co.uk – www.ecologyco-op.co.uk

Appropriate Assessment Screening Statement

Camp Field, Bartons Road, Havant

Author: Briony Hill BSc, GradCIEEM

Reviewed by: Dan Bennett BSc (Hons), MCIEEM

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The Ecology Co-operation Ltd
Registered Office: Greens Court, West Street, Midhurst, West Sussex, GU29 9NQ
Company number: 8905527



Executive Summary

1. The Ecology Co-op was commissioned by Wessex Environmental Planning to undertake screening for Appropriate Assessment for a proposed residential development at 'Camp Field' in Havant. This has been completed due to the proximity of the site to Chichester and Langstone Harbours Special Protected Area (SPA) and Ramsar, and Solent Maritime Special Area of Conservation (SAC), Natura 2000 sites.
2. This proposal is in connection with developing the southern part of the site, which is likely to include approximately 72 properties with public open space and a community orchard. Green space will be retained across the northern portion of the site.
3. Chichester and Langstone Harbours Ramsar and SPA, and Solent Maritime SAC are located approximately 2.9km south of the site.
4. Qualifying features for the SPA and Ramsar designations include internationally important breeding populations of tern species, passage populations of three bird species, overwintering populations of six bird species, including dark-bellied Brent geese, and regularly supporting over 93,000 waterfowl. The primary SAC designating features are Annex I habitats: estuaries, spartina swards (*Spartinion maritimae*) and Atlantic salt meadows (*Glaucopuccinellietalia maritimae*); however, the site also supports seven other Annex 1 Habitats, which are qualifying features.
5. This screening assessment took into account all potential direct impacts from habitat loss/damage, noise, lighting, dust and surface water pollution. There is no perceived likely significant effects of the proposed development to the designated sites and their qualifying features, due to the distance between the proposed development site and the Natura 2000 sites (2.9km). For the same reasons, the potential effects of increased recreational pressure, traffic, nitrogen deposition are not considered to be 'likely significant effects' in isolation.
6. However, there is potential for 'likely significant effects' on the qualifying features of the SPA in combination with the other large-scale housing development proposals in the local area, through the cumulative increase in public recreation pressure (e.g. disturbance to birds from dog walking), and traffic noise.
7. A HRA produced by Havant Brough Council concluded that the draft local plan has the potential to lead to adverse effects on European sites and an appropriate assessment of certain policies and proposals within the draft local plan is required. This document should consider whether the cumulative effects of all proposed residential development, located within the zone of influence, in combination could lead to significant 'adverse impacts on the integrity of the sites.



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1 INTRODUCTION

1.1 Purpose of the Report

The Ecology Co-operation Ltd (The Ecology Co-op) was commissioned by Wessex Environmental Planning PLC to prepare a formal screening assessment for Havant Borough Council who have requested a Habitat Regulations Assessment (HRA) of potential impacts on Natura 2000 sites found within 5km of a proposed residential development, to include approximately 72 properties.

This document presents the results of a “Stage 1: formal screening for any ‘likely significant effects (either alone or in combination with other plans or projects)’ of the planning application¹. This determines the need for an Appropriate Assessment (Stage 2 HRA) to assess whether these effects will have an adverse effect on the integrity of the sites and their qualifying features.

1.2 Legal basis

Habitats Regulations Assessment (HRA) refers to the requirement for any plan or project to assess the potential implications for European sites. The need for HRA is set out within the EC Habitats Directive 92/43/EC, which is transposed into British Law. Article 6(3) of the EU Habitats Directive provides that:

“Any plan or project not directly connected with or necessary to the management of the [European] 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.”

Recently the Court of Justice of the European Union (CJEU), ruled for the ‘People Over Wind’ case that: ‘contrary to domestic case law, guidance and common practice in the UK, it is not correct to take into consideration any factors intended to avoid or reduce harmful effects (i.e. ‘mitigation’ measures) at the initial screening stage of HRA.’ Instead mitigation measures should be considered at the second stage, the Appropriate Assessment, under Article 6(3) of the Habitats Directive ²

1.3 Habitat Regulations Assessment

The Natura 2000 site network is designated under the EU Habitats and Wild Birds Directives³ to conserve and protect Europe’s most important habitat types. In England and UK offshore areas, these

¹ The Habitats and Wild Birds Directives in England and its seas; Core guidance for developers, regulators & land/marine managers (DEFRA, 2012). Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/82706/habitats-simplify-guide-draft-20121211.pdf

² InsideEcology (2018), HRA, People Over Wind and the presumption in favour. Available at: <https://insideecology.com/2018/10/16/hra-people-over-wind-and-the-presumption-in-favour/>

³ Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora (“the Habitats Directive”) and Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds (“the Wild Birds Directive”).



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directives are transposed by the Habitats Regulations 2017⁴, which require that any plan or project that may have a 'likely significant effect' on a site (either individually or in combination with other plans or projects), must be made subject to an 'appropriate assessment' of its implications for the site in view of the conservation objectives, and can only proceed if it can be shown that they will not adversely affect the integrity of the site.

Havant Borough Council have requested Habitats Regulations Assessment (HRA) of potential impacts on Natura 2000 sites found within 5km of the proposed residential development at 'Camp Field' to include approximately 72 properties.

There are four stages in a HRA:

Stage 1 – 'Screening': The process by which, the potential impacts of a project are identified. These identified impacts are then assessed for their potential to impact upon the Natura 2000 site and its qualifying features, both alone and in-combination with other plans and projects.

Stage 2 – 'Appropriate Assessment': Where likely significant effects are identified through screening, the next stage is to determine whether these impacts will have adverse effects on the integrity of the site and its qualifying features, either alone or in-combination with other plans and projects. Where there are adverse effects, the potential mitigation for these effects should be provided.

Stage 3 – 'Assessment of Alternative Solution': This process looks at alternative ways to achieve the aims of the plan or project that avoid the adverse effects to the Natura 2000 site and its qualifying features.

Stage 4 – 'Assessment where no alternative solutions exist and where adverse impacts remain': Process by which the compensatory measures provided are assessed where there are no alternative solutions and adverse effects remain. The assessment is undertaken if there are imperative reasons of overriding public interest (IROPI).

1.4 Site Overview

The site, Camp Field, is located north of Bartons Road, situated on the north-east outskirts of Havant, which is a town in Hampshire. It is accessed via a track leading to The Oaks Havant Crematorium, to the north. Figure 1 shows the boundary of the site. The central grid reference for the site is approximately SU 7333 0811. The zone to be developed is approximately 2.8ha of the total 6.2ha that the red-line boundary encompasses. The southern area will include the provisioning of parking and public open space, which will incorporate a community orchard, a play area and Sustainable Drainage Systems (SuDS).

The site is set on the outskirts of Havant in a semi-urban landscape. The area within the red line boundary comprises an arable field with poor semi-improved grassland margins and a strip of improved grassland, which supports scattered broadleaved trees in the centre of the field. On the western

⁴ The Conservation of Habitats and Species Regulations 2017 (the "Habitats Regulations") (as amended) apply in England and its seas up to 12 nautical miles from the coast.



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boundary of the site is a native, species-rich hedgerow with trees, which connects directly to Ancient Semi-natural Woodland located directly adjacent to part of the site's western and northern boundaries. The other half of the northern boundary is marked with wire mesh fencing and meets the grounds of the adjacent crematorium. Along the southern boundary is a mixture of species-poor defunct hedgerow with trees and fencing – beyond which is Bartons Road. Finally, on the eastern boundary is high wire-mesh fencing – beyond which is the access road to the crematorium. Dry ditches are also present along the western boundary and part of the northern boundary.

This proposal is in connection with developing the southern part of the site, which is likely to include approximately 73 properties with public open space and a community orchard. Green space will be retained across the northern portion of the site.

This HRA Screening Report focuses on the following Natura 2000 sites identified within 5km of the site (see Figure 2 for locations):

- Chichester and Langstone Harbours SPA;
- Chichester and Langstone Harbours Ramsar; and
- Solent Maritime SAC

These sites are all located approximately 2.9km south of the site's southern boundary at the closest points, as measured on the MAGIC online resource.



Figure 1. An aerial image showing the location of the site. The approximate site boundary is outlined in red.



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Images produced courtesy of Google maps (Map data ©2018 Google).

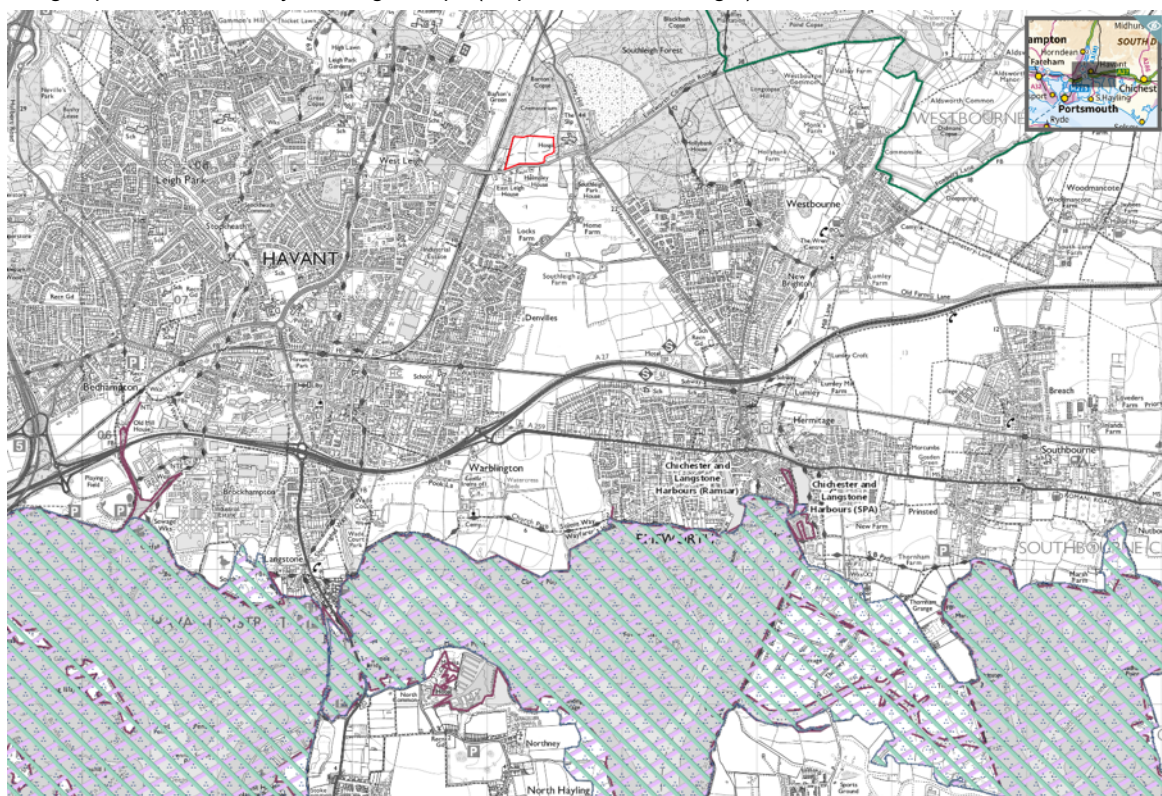


Figure 2. Location of Chichester and Langstone Harbours SPA and Ramsar, and Solent Maritime SAC south of the application site. The site's boundaries are shown in red. Images produced courtesy of Magic maps (<http://www.magic.gov.uk/>, contains public sector information licensed under the Open Government Licence v3.0).

2 METHODOLOGY OF STAGE 1 - SCREENING

The process is as follows:

1. Identify and characterize European Sites within the zone of impact⁵;
2. Review the proposed development plan to identify potential impacts and likely effects on Natura 2000 sites;
3. Identify and consider all other plans and projects within the zone of impact that may have an 'in-combination' impact to Natura 2000 sites; and
4. Carry out a screening assessment, recording the analysis and supporting information⁶.

In order to determine that there will be no significant effect upon the Natura 2000 sites, the following criteria must be met:

- There must not be any reduction in the area of the Annex 1 habitats (or composite features);
- There must not be any changes to the composition of the habitats for which the site was designated (such as the abundance and diversity that compromises the habitat over time);

⁵ The zone of impact used here is a 5km buffer zone

⁶ South East Wales Strategic Planning Group (SEWSPG) (2008), *Habitat Regulation Assessment: Toolkit to support HRA screening and appropriate assessment of plans*.



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- There must not be any direct effect upon the species for which this site was designated or classified beyond any existing baselines;
- There must not be any indirect effects upon the population of species for which the site was designated or classified due to loss or degradation of their habitat (quality and/or quantity), and:
- There must not be any interruption or degradation of the physical, chemical or biological processes that support habitats and species for which the site was designated or classified.

This report uses the approach provided in Assessment of Plans and Projects Significantly Affecting sites (European Commission, 2002).

3 LIMITATIONS

It is important to note that there is a level of uncertainty associated with the HRA process. Numerous factors can alone or in combination place caveats on the level of certainty of the assessment.

Uncertainty can arise when trying to predict effects of a proposed plan upon the interest features of a Natura 2000 sites. This can result from a lack of scientific knowledge or inadequate data in relation to particular ecological features. It can also occur where the mechanisms of effects and responses of habitats and species are poorly understood through a lack of research. It is often not possible to accurately predict and estimate the nature, timing, scale or spatial extent of changes brought about by a development proposal.

To overcome this issue, a precautionary approach is followed where the most likely worst outcome is assumed, in accordance with the Habitats Directive.

4 APPROPRIATE ASSESSMENT SCREENING MATRIX

Project Name:	Residential development at Camp Field, Havant.
National Grid Ref:	SU 7333 0811
Site Address:	Camp Field, Bartons Road, Havant
Planning Application Details	Development Consultation Forum with Havant Borough Council in August 2018. Comments made by Natural England and the Council's Ecologist highlighted the requirement for a Habitats Regulations Assessment due to the proximity of Chichester and Langstone Harbours SPA. A screening option was made to Havant Borough Council and Natural England for the proposal. Comments were received on the 1st of November. With regards to the European Designated sites Natural England commented:



	“Bird Aware Solent I SRMP Contributions This application is within 5.6km of the Chichester and Langstone Harbours Special Protection Area (SPA) and will lead to a net increase in residential accommodation. Any forthcoming planning application will need to comply with adopted planning policy to mitigate against adverse effects from recreational disturbance on the Solent SPA sites, as agreed by the Solent Recreation Mitigation Partnership (SRMP) Definitive Strategy.”
Description of proposal:	This proposal is in connection with developing the southern part of the site known as Camp Field. The development site will occupy 2.8 Ha on the southern part of the 6.2Ha site. This will include approximately 71 residential properties, provision of parking and access, a community orchard and a sustainable drainage system (SuDS). The existing site access on the eastern boundary, which separates from the access road to The Oaks Havant Crematorium, will be used. The existing green space will be retained across the northern portion of the site. There is potential for this northern portion of the site to be developed in the future, should more housing be allocated by East Hants District Council. Figure 3 shows the proposed layout.  Figure 3. Master plan for Camp Field produced by Stainsby Architect and provided by email on 24th October 2018. Drawing number 089 PL 04 H produced in October 2018.
Reference documents:	The Ecology Co-op (2017). <i>Preliminary Ecological Appraisal and Phase 1 Habitat Assessment – Land North Bartons Road, Havant.</i> The Ecology Co-op (2018) <i>Phase 2 Holding Document – Camp Field, Bartons Road, Havant</i>

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	The Ecology Co-op (2018) Biodiversity Mitigation and Enhancement Plan – Camp Field, Bartons Road, Havant	
Date:	Author (Name/Organisation):	Verified (Name/Organisation):
13 th September 2018	Briony Hill & Paul Whitby, The Ecology Co-op	Dan Bennett, The Ecology Co-op
Natura 2000 Sites under Consideration:	Chichester and Langstone Harbours SPA Chichester and Langstone Harbours Ramsar Solent Maritime SAC	
Characteristics of European sites(s)		
<i>A brief description of the European Site should be produced, including information on:</i>		
Name of European Site and its EU code	Chichester and Langstone Harbours SPA (UK9011011) Chichester and Langstone Harbours Ramsar (UK11013) Solent Maritime SAC (UK0030059)	
Location and distance of the European Site from the proposed works	Figure 2 within this report shows the location of the SAC, SPA and Ramsar sites in relation to the Camp Field. At the closest point, as measured on the MAGIC online resource, the SPA/Ramsar and SAC is approximately 2.9km south of the site boundary and proposed construction zone. Four main roads separate the site from the Chichester and Langstone Harbours SPA/Ramsar and Solent Maritime SAC (Bartons Road, Southleigh Road, the A27 trunk road, and Roman Road), and a railway line. Between these are extensive arable fields with occasional pasture fields and the outskirts of Denvilles – a residential area.	
European Site size	Chichester and Langstone Harbours SPA – 5810.03 ha (area) Chichester and Langstone Harbours Ramsar – 5810.03 ha (area) Solent Maritime SAC – 11243.12 ha (area)	



Key features of the European Site including primary reasons for selection and any other qualifying interests	Chichester and Langstone Harbours SPA and Ramsar Chichester and Langstone Harbours SPA and Ramsar cover the same area. The site covers two harbours that are separated by a stretch of water. These estuarine basins comprise sand and mudflat, which are exposed at low tide. These habitats support rich assemblages of invertebrates and algae beds, which are important for colonies of breeding terns and wintering birds. The site has particular significance for water birds, especially in migration periods and in winter. <i>This site qualifies under Article 4.1 of the Directive (79/409/EEC) by supporting populations of European importance of the following species listed on Annex I of the Directive:</i> <u>Breeding:</u> Little Tern <i>Sterna albifrons</i>: 100 pairs, representing up to 4.2% of the breeding population in Great Britain (5 year mean 1992-1996). Sandwich Tern <i>Sterna sandvicensis</i>: 158 pairs, representing up to 1.1% of the breeding population in Great Britain (1998). <u>On Passage:</u> Little Egret <i>Egretta garzetta</i>: 137 individuals, representing up to 17.1% of the population in Great Britain (1998). <u>Overwintering:</u> Bar-tailed Godwit: 1,692 individuals, representing up to 3.2% of the wintering population in Great Britain (5 year peak mean 1991/1-1995/6). Little Egret: 100 individuals, representing up to 20.0% of the wintering population in Great Britain (count as at 1998). <i>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:</i> <u>On Passage:</u> Ringed Plover: 2,471 individuals, representing up to 4.9% of the Europe/Northern Africa wintering population (5 year peak mean 1991/2-1995/6). <u>Overwintering:</u> Black-tailed Godwit <i>Limosa limosa islandica</i>: 1,003 individuals, representing up to 1.4% of the wintering Iceland breeding population (5 year peak mean 1991/2-1995/6). Dark-bellied Brent Goose <i>Branta bernicla</i>: 17,119 individuals, representing up to 5.7% of the wintering Western Siberia/Western Europe population (5 year peak mean 1991/2-1995/6).
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Dunlin *Calidris alpina*: 44,294 individuals, representing up to 3.2% of the wintering Northern Siberia/Europe/Western Africa population (5 year peak mean 1991/2-1995/6).

Grey Plover *Pluvialis squatarola*: 3,825 individuals, representing up to 2.5% of the wintering Eastern Atlantic (5 year peak mean 1991/2-1995/6).

Redshank *Tringa totanus*: 1,788 individuals, representing up to 1.2% of the wintering Eastern Atlantic (5 year peak mean 1991/2-1995/6).

Ringed Plover *Charadrius hiaticula*: 846 individuals, representing up to 1.7% of the wintering Europe/Northern Africa (5 year peak mean 1991/2-1995/6).

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

Wigeon *Anas penelope*, bar-tailed godwit *Limosa lapponica*, little grebe *Tachybaptus ruficollis*, shelduck *Tadorna tadorna*, curlew *Numenius arquata*, teal *Anas crecca*, pintail *Anas acuta*, shoveler *Anas clypeata*, red-breasted merganser *Mergus serrator*, oystercatcher *Haematopus ostralegus*, lapwing *Vanellus vanellus*, knot *Calidris canutus*, sanderling *Calidris alba*, cormorant *Phalacrocorax carbo* and whimbrel *Numenius phaeopus*.

A full description of this designation can be found here:

<http://jncc.defra.gov.uk/default.aspx?page=2034>;

<http://jncc.defra.gov.uk/pdf/SPA/UK9011011.pdf>; and,

<http://jncc.defra.gov.uk/pdf/RIS/UK11013.pdf>.

Solent Maritime SAC

This designated site is located within West Sussex. Solent Maritime SAC is 11243.12ha in area. It has a differing boundary line to the Chichester and Langstone Harbours SPA and Ramsar designation, but the two designations significantly overlap. The Solent Maritime SAC consists of harbours, estuaries, areas of open coast and inshore water around the Solent. The site stretches from Hurst Spit in the west to Chichester Harbour in the east. It includes areas along the north coast of the Isle of Wight from Yarmouth to Bembridge Harbour, as well as the mainland shores.

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

The primary reason for its designation as a SAC is the presence of the Annex I habitats: (1130) Estuaries, (1320) *Spartina* swards *Spartinion maritimae* and (1330) Atlantic salt meadows *Glauco-Puccinellietalia maritimae*.

It also supports (1110) Sandbanks, which are slightly covered by sea water all the time,



(1140) mudflats and sandflats not covered by seawater at low tide, (1150) coastal lagoons, (1210) annual vegetation of drift lines, (1220) perennial vegetation of stony banks, (1310) *Salicornia* and other annuals colonizing mud and sand, and (2120) "Shifting dunes along the shoreline with *Ammophila arenaria* ("white dunes")", which although are not a primary reason for the sites selection, are qualifying features.

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

(1016) Desmoulin's whorl snail *Vertigo moulinsiana*

A full description of this designation can be found here:

<http://jncc.defra.gov.uk/protectedsites/sacselection/sac.asp?EUCode=UK0030059>



Vulnerability of the European Site – any information available from the standard data forms on potential effect pathways	Natural England published a report in October 2014: Improvement Programme for England's Natura 2000 Sites (IPENS), Planning for the future, Site Improvement plan: Solent. This document covers Chichester and Langstone Harbours SPA along with the following additional Natura Sites: Solent Maritime SAC, Portsmouth Harbour SPA and Solent & Southampton Water SPA. Fifteen issues were acknowledged as being a threat: 1. Public access/disturbance 2. Coastal squeeze 3. Fisheries: commercial marine and estuarine 4. Water pollution 5. Changes in species distributions 6. Climate change 7. Change to site conditions 8. Invasive species 9. Direct land take from development 10. Biological resource use 11. Change in land management 12. Inappropriate pest control 13. Hydrological changes 14. Direct impact from 3rd party 15. Extraction: non-living resources One issue was acknowledged as being a pressure: 1. Air Pollution; impact of atmospheric nitrogen deposition
European Site conservation objectives – where these are readily available	Chichester and Langstone Harbours SPA Natural England's Conservation Objectives for this SPA are provided in Appendix 1. The Conservation objectives include: "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 and restoring; 1. The extent and distribution of the habitats of the qualifying features 2. The structure and function of the habitats of the qualifying features 3. The supporting processes on which the habitats of the qualifying features rely 4. The population of each of the qualifying features, and, 5. The distribution of the qualifying features within the site." Solent Maritime SAC



	Natural England's Conservation Objectives for this SAC are provided within Appendix 2. The Conservation objectives include: "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: 1. The extent and distribution of qualifying natural habitats and habitat of qualifying species 2. The structure and function (including typical species) of qualifying natural habitats 3. The structure and function of the habitat of qualifying species 4. The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely 5. The population of qualifying species, and, 6. The distribution of qualifying species within the site.
Description of Project	
<i>Describe any likely direct, indirect or secondary impacts of the project (either alone or in combination with other plans or projects) on the European Site by virtue of:</i>	
Size and scale	The development site will occupy 2.8 Ha on the southern part of the 6.2Ha site. This will include approximately 71 residential properties, provision of parking and access, a community orchard and a sustainable drainage system (SuDS). At the time of writing, the proposed schedule of accommodation is as follows: 3 one-bed, 25 two-bed, 41 three-bed and 3 four-bed. It is proposed to use the existing access point to the site, located on the eastern boundary. This connects to the track leading to The Oaks Havant Crematorium to the north.
Land-take	There will be no land take directly within, adjacent or in immediate close proximity to the SPA/Ramsar or SAC boundary. All land take is located a minimum of 2.9km from the Natura 2000 sites. The habitats on site consist of an arable field with poor semi-improved grassland margins. A strip of improved grassland, which supports scattered broadleaved trees, is located in the centre of the field. On the western boundary is a native, species-rich hedgerow with trees, which connects directly to Ancient Semi-natural Woodland located directly adjacent to part of the site's western and northern boundaries. The other half of the northern boundary is marked with wire-mesh fencing and meets the grounds of the adjacent crematorium. Along the southern boundary is a mixture of species-poor defunct hedgerow with trees and fencing – beyond which is Bartons Road. Finally, on the eastern boundary is high wire-mesh fencing – beyond which is the access road to the crematorium. Dry ditches are also present along the western boundary and part of the



	northern boundary. Therefore, the construction zone contains no habitat that would be utilised by the qualifying species of the SPA/Ramsar or qualifying habitats of the SAC. Details for the Solent Wader and Brent Goose Strategy Sites, obtained from HBIC, did not identify the site itself as being important for either brent geese or waders. In addition, no important sites for brent geese or waders are located within 2km (see Preliminary Ecological Appraisal and Phase 1 Habitat Assessment report).
Distance from the European Site or key features of the site <i>(from edge of the project assessment corridor)</i>	At its closest point, as measured on the MAGIC online resource, the site is located approximately 2.9km from the boundary of the SPA/Ramsar and SAC.
Resource requirements <i>(from the European Site or from areas in proximity to the site, where of relevance to consideration of impacts)</i>	There are no resource requirements of the proposed development, relating to the European designated sites.
Transport requirements	There is existing access to the site through the eastern boundary, which connects to the access road for The Oak Crematorium Havant. This access road leads off Bartons Road to the south. The number of lorry movements required during the construction phase is currently unknown; however, a proportion of the excavated subsoil will be retained on site to create a bund along the eastern boundary, reducing transportation requirements to dispose of waste soil material. Post construction, there will be an increase in traffic from new residents. The site will



provide 144 resident parking spaces, plus approximately 29 visitor parking spaces (173 total); this is deemed adequate based on the accommodation schedule for the site. Assuming all parking spaces will be occupied and all cars used for one return trip on a daily basis, there would be approximately 173 extra cars commuting to and from the site per day. This totals 346 car trips per day. This is considered to be an overestimation as it is unlikely all parking space will be occupied and all cars will make a return trip each day.

All traffic will leave the residential area via Bartons Road, located south of the site. In turn a proportion will use the following main roads: the B2149 (heading north and south), which connects to the west of Bartons Road or Comley Hill (heading north), Emsworth Common Road (heading east) and Horndean Road and Eastleigh Road (heading south), which connect to the eastern limit of Bartons Road.

A road is considered to be affected if the daily traffic flow changes by 1,000 annual average daily traffic (AADT) flow or more⁷. Therefore, in a worst-case scenario this development could contribute to an increase in AADT of +346, along Bartons Road. This is approximately 34.6% of the AADT and considered not significant.

The closest main roads detailed above, do not run through or adjacent to the SPA/Ramsar or SAC.

The B2149 provides connectivity to the A27 south, which at the point of connection is 0.8km from the designated site boundary and at the closest point, 2.1km west, is less than 20m apart. It also provides connectivity to Langstone Road that joins to Hayling Island and runs through the Natura 2000 designated sites. Horndean Road provides connectivity to the A259, which at the point of connection is approximately 280m from the designated site boundary.

The travel distance from the site to the A27 south, where the designated site is in closest proximity, is approximately 6km; to Langstone Road, where it runs through the designated site, is approximately 4.8km; and to the A259, where the designated site is in closest proximity, is approximately 3.2km. The increase in traffic will dissipate with distance from the site with only a proportion travelling the distances detailed above, along roads through or in close proximity to the SPA/Ramsar and SAC.

In addition, a proportion of traffic will travel in opposite directions from the Natura 2000 sites and will not pass through roads adjacent to or through the designated sites.

Therefore, overall no likely significant effects have been identified in relation to the impact of traffic to the SPA/Ramsar and SAC.

⁷ Wealden District (incorporating part of the South Downs National Park) Local Development Framework: Assessment of the Core Strategy under the Habitats Regulations (2011). UE Associates.



Emissions (e.g. surface water runoff, atmospheric, dust and noise pollution – from both soluble and insoluble pollutants)	Noise During the construction phase there will be construction noise from activities such as cutting of material, general construction machinery and possibly piling. The impact to the SPA/Ramsar and SAC is considered negligible as at the closest point, these are situated 2.9km away. Dust Dust is likely to be produced during the construction process through cutting of materials and transportation across dirt tracks; however, there are no buildings to be demolished or hard standing to be removed and as such, the production of dust is less significant. The deposition of dust decreases rapidly from its source, and as the SPA/Ramsar and SAC are approximately 2.9km at the closest point. The qualifying features (breeding and overwintering birds and habitats) are most likely to be less sensitive to dust deposition, unlike fine vegetation or lichen communities. Therefore, there is negligible potential for dust during demolition to impact these designated sites. Surface Water The development lies significantly far from the SPA/Ramsar and SAC, that there is no likely perceived risk of surface water run-off from the development reaching it. Lighting Artificial lighting impacts can alter the behaviour of a variety of animals. In birds, it can affect sleep patterns, feeding behaviour and could disrupt the long-term circadian rhythm that dictates the onset of the breeding season. Lighting may also change predator/prey dynamics, based upon the ability of either species to react under different light levels. In addition, it can cause birds to abandon nest sites and potentially displace them from suitable habitat within or outside of the boundaries of designated sites, contracting their distribution. A joined-up strategy for limiting the impacts of artificial light at a landscape level is being driven in Hampshire through Technical Guidance Note TG13 – Street Lighting. The development will comply with guidance issued by the Bat Conservation Trust on mitigation of lighting impacts upon wildlife as detailed within the Biodiversity Mitigation and Enhancement Plan. Lighting at this development will not lead to direct light-splash at the SPA/Ramsar or SAC as these sites are located approximately 2.9km away. As a result, there is considered to be no likely impact of lighting to the designated site and their qualifying habitats or species. Nitrogen Deposition An increase in nitrogen deposition within the Natura 2000 sites can cause increased growth in fast growing, nutrient demanding species such as grasses, leading to a
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decrease in species diversity with species that are adapted to low nitrogen becoming outcompeted. With other impacts on plants, such as increased litter fall, increased sensitivity and risk of damage from drought, frosts and pests and death of organism cells also possible. Vehicle use results in nitrogen deposition and therefore an increase in traffic can increase nitrogen deposition.

There will be an increase in traffic during the construction phase to allow the transportation of materials and machines. The number of lorry movements is currently unknown; however, at its peak, this is expected to be less than the increase in traffic post construction, discussed below.

The increase in traffic post development has been worked out at a maximum of 346 extra car trips per day (see above). This will result in a net increase in the nitrogen deposition locally. However, the closest main roads do not run through or adjacent to the SPA/Ramsar or SAC and the increase in traffic will dissipate with distance from the site with only a proportion anticipated to travel the distances detailed in above sections along roads through or in close proximity to the SPA/Ramsar and SAC.

Using the Site Relevant Critical Load function on The UK Air Pollution Information System (APIS) (www.apis.ac.uk)⁸ the deposition is recorded as:

- 13.86 kgN/ha/yr at grid reference SU699057 where the A27 is in closest proximity to the Natura 2000 designated sites – 6km travel distance for the site.
- 11.48 kgN/ha/yr at grid reference SU718046 where Langstone Road runs through the Natura 2000 designated sites – 4.8km travel distance from the site.
- 14.28 kgN/ha/yr at grid reference SU771056 where the A259 is in closest proximity to the designated site boundary – 3.2km travel distance from the site.

These figures are below the critical load of the relevant SAC habitats within closest proximity to the above roads according to the habitat maps on www.magic.gov.uk site:

- 20-30 kgN/ha/yr for Estuaries (H1130)
- 20-30 kgN/ha/yr for Atlantic Salt meadows (H1330)
- Unknown for Mudflats and sandflats not covered by seawater at low tide (H1140)

Therefore, the increase in nitrogen is not likely to be significant post construction.

Habitat Damage

Given the distance between the proposed construction zone and the SPA/Ramsar and SAC there is no potential for habitats be damaged upon the Natura 2000 sites during

⁸ Jones, L., Hall, J., Strachan, I., Field, C., Rowe, E., Stevens, C.J., Caporn, S.J.M., Mitchell, R., Britton, A., Smith, R., Bealey, B., Masante, D., Hewison, R., Hicks, K., Whitfield, C. & Mountford, E. 2016. A decision framework to attribute atmospheric nitrogen deposition as a threat to or cause of unfavourable habitat condition on protected sites. JNCC Report No. 579. JNCC, Peterborough



	construction.
Excavations requirements (e.g. impacts of local hydrogeology)	Footings will be dug to a typical depth required for footings of residential properties, which is anticipated to be 1.5-2m, subject to soil investigation. Due to the SPA/Ramsar and SAC being approximately 2.9km away this is not likely to affect the hydrology of this designation.
Duration of construction, operations etc	The duration of the construction work is anticipated to be approximately 18 months.
Recreational Pressure	Recreational Pressure and Disturbance from Dogs Recreational pressure and especially disturbance from dogs can lead to: 1. Disturbance and stress levels upon birds resulting in increased vigilance and reduced feeding time, leading to reduced fitness, as well as possible direct attacks by dogs on wildlife. 2. Physical damage to habitats through trampling and through dog waste not being picked up – increasing the nutrient levels in sensitive areas. 3. An increased burden upon management regimes (such as car park and path/track maintenance), or prevention of them being suitably implemented (such as litter picking). 4. Increased risk of fly-tipping or other anti-social behaviour. Visitor numbers could increase as a result of development within the local area. Any continued increase in visitor numbers will combine to have a detrimental impact upon the SPA/Ramsar and SAC. The Solent Disturbance and Mitigation Project⁹ found that visitors, excluding holidaymakers, lived on average 5.04km from the area they visited. Most visitors, to Chichester Harbour (irrespective of mode of transport) lived south of the A27. Three locations; Emsworth, South Hayling, and Chichester city contributed the highest numbers of local visitors to Chichester Harbour. However, some visitors came from as far away as Horndean, approximately 8km north-west and close to the A3 trunk road. The proposed new residential development is located approximately 2.9km from the

⁹ Fearnley, H., Clarke, R. T. & Liley, D. (2010). The Solent Disturbance & Mitigation Project. Phase II - On-site visitor survey results from the Solent region. ©Solent Forum /Footprint Ecology



	coastline of the Natura 2000 sites and is therefore well within the distance that visitors typically travel to the Natura 2000 site. Looking at these figures in more detail, walking and dog-walking were the most frequent activity accounting for 86% of all reasons for visiting the designated site in roughly equal proportion. The average distance travelled for these activities was 2.7km and 1.2km respectively. Since the proposed development site is slightly beyond this distance, it could be argued that residents at the development site are less likely to travel to these designated sites for dog walking or walking activities, the most frequent reasons the SPA/Ramsar and SACs are visited for. Furthermore, there is alternative greenspace potentially available for these activities directly north of the development within the same land-holding. As explained by Havant Borough Council the detailed local picture coming to light is that users of the most local stretch of coast arrive on foot or by car¹⁰. The majority of foot users are located within 1km. There is restricted vehicle access to the Chichester and Langstone Harbour. Considering both of these factors visitor numbers resulting from this development are anticipated to be small. Overall, it is considered unlikely that new residents would be regular users of the SPA/SAC. In conclusion, this impact is deemed unlikely to be significant alone.
Other	
Description of avoidance and/or mitigation measures	
<i>Describe any assumed (plainly established and uncontroversial) mitigation measures, including information on:</i>	
<i>Nature of proposals</i>	All construction and operational procedures will be legally compliant and adhere to best practice guidance. A Construction Management Plan will be produced and adhered to.
<i>Location</i>	The proposed development is not within the SPA, Ramsar or SAC boundaries. All construction work will therefore be outside the Natura 2000 sites and do not result in any direct land-take or damage to designated habitats. The distance between the development site and the designated sites is sufficient to attenuate potential indirect impacts such as pollution, dust, nitrogen, traffic and recreational pressure. Taken in isolation, this proposal is unlikely to have any significant effects.

¹⁰ Havant Borough Council (2013). Habitat Regulation Assessment (HRA) Screening Matrix - APP/12/01222 – Proposed Development Site Manor Farm and Copseys Nursery, Hallett Road, Havant



<i>Evidence for effectiveness</i>	Construction best practice outlined is commonly accepted as effective.
<i>Mechanism for delivery (legal conditions, restrictions or other legally enforceable obligations)</i>	Planning conditions can be used to ensure construction best practice methods are followed.
<i>Assessment Criteria</i>	Evidence of all actions should be provided to the planning authority for the release of conditions.
<i>Describe the individual elements of the project (either alone or in combination with other plans or projects) likely to give rise to impacts on the European Site.</i>	
There are no identified likely significant effects on Chichester and Langstone Harbours SPA/Ramsar and Solent Maritime SAC sites as a result of this development.	
Initial Assessment	
<i>The key characteristics of the site and the details of the European Site should be considered in identifying potential impacts. Describe any likely changes to the site arising as a result of:</i>	
Reduction of habitat area	There will be no land take from within the SPA, Ramsar or SAC boundary as a result of the development proposals and therefore there will be no habitat loss within the European protected sites.
Disturbance to key species	The qualifying features of the Chichester and Langstone Harbours SPA/ Ramsar site includes 17 species of waders and wildfowl. Noise pollution, light pollution and an increase in recreational pressure are the factors most likely to cause disturbance to these species, with the potential to impact upon foraging behaviour, nesting and the distribution of these species. These factors have all been deemed as not significant as a result of this residential development. Therefore, disturbance to key species is not anticipated.
Habitat or species fragmentation	There will be no land take from the SPA/Ramsar or SAC and there are no suitable habitats of value upon the proposed construction zone for the qualifying species. No impacts are therefore anticipated.

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Reduction in species density	Noise pollution, light pollution and recreational pressure could lead to fewer wintering and breeding birds due to increased disturbance and stress to birds, driving them off the site. The impacts listed above have all been deemed as not significant alone. Therefore, there is anticipated to be no reduction in species density as a result of this residential development.
Changes in key indicators of conservation value (water quality, etc)	Water Quality No anticipated impact upon the water quality of Ramsar, SPA and SAC. Hydrological Regime No impact on hydrological regime of SPA, Ramsar or SAC.
Climate change	Sea level rise linked to climate change will lead to 'coastal squeeze' resulting in the loss of intertidal habitat within the SPA/SAC. The proposed development will contribute to CO ₂ emissions but the contribution this makes to climate change relative to other sources is proportionally very small indeed. However, taken together, all greenhouse gas emissions will have a cumulative effect on climate.
Describe any likely impacts on the European Site as a whole in terms of:	
Interference with the key relationships that define the structure of the site	There are no anticipated impacts that would interfere with the key relationships that define the structure of the site, such as changes in plant species composition and a reduction in species diversity.
Interference with the key relationships that define the function of the site	There are no anticipated impacts that would interfere with the key relationships that define the function of the site, such as reduction in the value of habitats with the function of supporting the qualifying Annex 1 bird species.
Indicate the significance as a result of the identification of impacts set out above in terms of:	
Reduction of	Not significant

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habitat area		
Disturbance to key species	Not significant	
Habitat or species fragmentation	Not significant	
Loss	Not significant	
Fragmentation	Not significant	
Disruption	Not significant	
Change to key elements of the site (e.g. water, hydrological regime etc)	Not significant	
<i>Describe from the above those elements of the project, or combination of elements, where the above impacts are likely to be significant or where the scale or magnitude or impacts is not known.</i>		
None deemed significant alone.		
<i>Risk</i>	<i>Assessment of Pollution</i>	<i>Significance</i>
N/A	N/A	N/A
<i>Avoidance Measures</i>		
<i>Avoiding Risk</i>	<i>Action in proposal</i>	
N/A	N/A	
Is the project likely to have a Significant Effect alone?		
No – none of the discussed impact pathways are considered to be significant.		



If there is no likely significant effect 'alone', are there other projects or plans that in-combination with the proposed development being assessed could affect the site?

A search has been made to account for recent development and development under construction in the zone of influence that may contribute to a cumulative negative impact upon the designating features of the SPA/Ramsar and SAC. All projects located within 5km of the Natura 2000 sites and 5km of the Camp Field site that are of a similar scale and have been accepted or are pending over the last 5 years, were considered. This has identified the following developments:

1. Bartons Rise - Linden Homes

This is a development of 53 Homes immediately to the west of Camp Field, which is recently completed and occupied. The development was formerly a mixture of approximately 30% brownfield and 70% greenfield land, utilising a former commercial site and pasture. The development immediately borders woodland to the north and a railway line to the west, with Bartons Road forming the southern boundary. This site is located approximately 2.9km from the SPA/Ramsar and SAC.

2. Bartons Road south – Bellway Homes

A site under ownership by Bellway Homes with outline planning for 175 homes is situated on the southern side of Bartons Road opposite the Camp Field site. This development is similar in nature to the Camp field development, in that the vast majority of the development footprint is also arable habitat of low ecological value. At the closest point this site is approximately 2.4km from the SPA/Ramsar and SAC.

3. Former Oak Park School, Leigh Road, Havant

Permission has been granted for an 80-bed nursing home, 51 affordable extra care flats and 48 affordable supported living flats with community facilities. This development is located within 1.8km from the SPA/Ramsar and SAC.

4. Land west of Horndean Road and south of Southleigh Road.

Permission has been granted for a residential development comprising 125 residential units and water retention area. At the closest point this site is located approximately 1.4km from the SPA/Ramsar and SAC.

5. Site Manor Farm and Copseys Nursery, Hallett Road, Havant

A hybrid planning application is associated with this site for 191 dwellings. The development will include open space with a play area, allotments and a farmers/vegetable market building. This development is located within 1.4km to Chichester and Langstone Harbour SPA and Ramsar.

6. Forty Acres

A planning application for 320 properties has been registered. This will include a care home, allotments and a habitat mitigation zone. This site is located within 0.2km from the SPA/Ramsar and SAC.

7. Land east of Castle Avenue



A planning application for 69 new dwellings with parking and electrical substation has been registered. At the closest point this site is located approximately 1km from the SPA/Ramsar and SAC.

Is the project likely to have a significant effect 'in combination'?

These large-scale multi-residential developments detailed above could potentially result in cumulative significant effects on the designated sites. Cumulative effects would most likely arise from:

- Increased recreational pressure and disturbance to birds
- increased traffic and associated nitrogen deposition

A HRA screening assessment was produced by Havant Borough Council in 2017 to support the draft local plan, which included 60 policies and proposals. This assessment concluded that in the absence of mitigation there is the potential for likely significant effects either alone or in combination on SPA/Ramsar supporting habitats as a result of the development allocation within the draft local plan. In summary:

- 58 policies and proposals were considered to have the potential for in-combination impacts from increasing atmospheric pollution
- 57 policies and proposals were considered to have the potential for increased recreational disturbance in combination with likely significant effects on Chichester and Langstone Harbour SPA/Ramsar, Solent & Dorset Coast SPA or Portsmouth Harbour SPA and Ramsar.
- 8 policies and proposals were considered to have the potential to result in direct impacts to Chichester & Langstone Harbours SPA/Ramsar and Portsmouth Harbour SPA/Ramsar through habitat loss or functional loss of supporting habitats through construction or operational activity alone.

This document included Camp Field (referenced as H21 – Land West of Havant Crematorium). It was concluded that this proposal could have a potential effect on a European site, either alone or in combination with other plans or projects.

The HRA screening document noted that there remains much uncertainty over the conclusions due to a lack of scientific data regarding certain elements, but that detailed studies were underway to reduce these levels of uncertainty. The report stated "It is considered highly likely that the outcomes of these studies will remove the potential for a likely significant effect in relation to the above issues for the majority of the policies and proposals through the incorporation of strategic mitigation measures. These would, as far as is demonstrably reasonable, avoid or mitigate any identified risks to site integrity."

Overall this screening report concluded that "It is the Borough council's view that the plan has potential to lead to adverse effects on European sites. Consequently, on the basis of current evidence, an appropriate assessment of certain policies and proposals within the Draft Local Plan is required."

An appropriate assessment document covering the local plan could not be found on the Havant Borough Councils website.



Conclusion of the Test of Likely Significant Effect on the Proposals	
<i>Outcome of screening stage (delete as appropriate).</i>	~~Significant Effects are Likely/~~ Sufficient Uncertainty Remains/ ~~Unlikely to have Significant Effects~~
<i>Is an Appropriate Assessment required (delete as appropriate)</i>	No – In isolation this development project is not likely to have any likely significant impact to the qualifying habitats and species of the Chichester and Langstone Harbours SPA/Ramsar and Solent Maritime SAC. However, a HRA screening assessment produced by Havant Borough Council for the draft local plan concluded that certain proposals and policies contained within it have potential to lead to likely significant effects on the European sites and recommended that an appropriate assessment will be required to determine whether these will lead to significant adverse effects on the integrity of the sites. This appropriate assessment should take into account the cumulative effects of the increase in recreational pressure and air quality arising from the residential developments in combination, contained within the draft local plan, including the proposed development at Camp Field.
<i>Are the appropriate statutory environmental bodies in agreement with this conclusion (delete as appropriate and attach relevant correspondence).</i>	To be determined.

Should you need any further advice on the information provided above, please do not hesitate to contact The Ecology Co-op.



5 APPENDIX 1



European Site Conservation Objectives for Chichester and Langstone Harbours Special Protection Area Site Code: UK9011011

With regard to the SPA and the individual species and/or assemblage of species for which the site has been classified (the 'Qualifying Features' listed below), and subject to natural change;

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.

This document should be read in conjunction with the accompanying *Supplementary Advice* document, which provides more detailed advice and information to enable the application and achievement of the Objectives set out above.

Qualifying Features:

- A046a *Branta bernicla bernicla*; Dark-bellied brent goose (Non-breeding)
- A048 *Tadorna tadorna*; Common shelduck (Non-breeding)
- A050 *Anas penelope*; Eurasian wigeon (Non-breeding)
- A052 *Anas crecca*; Eurasian teal (Non-breeding)
- A054 *Anas acuta*; Northern pintail (Non-breeding)
- A056 *Anas clypeata*; Northern shoveler (Non-breeding)
- A069 *Mergus serrator*; Red-breasted merganser (Non-breeding)
- A137 *Charadrius hiaticula*; Ringed plover (Non-breeding)
- A141 *Pluvialis squatarola*; Grey plover (Non-breeding)
- A144 *Calidris alba*; Sanderling (Non-breeding)
- A149 *Calidris alpina alpina*; Dunlin (Non-breeding)
- A157 *Limosa lapponica*; Bar-tailed godwit (Non-breeding)
- A160 *Numenius arquata*; Eurasian curlew (Non-breeding)
- A162 *Tringa totanus*; Common redshank (Non-breeding)
- A169 *Arenaria interpres*; Ruddy turnstone (Non-breeding)
- A191 *Sterna sandvicensis*; Sandwich tern (Breeding)
- A193 *Sterna hirundo*; Common tern (Breeding)
- A195 *Sterna albifrons*; Little tern (Breeding)

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1 APPENDIX 2



European Site Conservation Objectives for Solent Maritime Special Area of Conservation Site Code: UK0030059

With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;

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

This document should be read in conjunction with the accompanying *Supplementary Advice* document, which provides more detailed advice and information to enable the application and achievement of the Objectives set out above.

Qualifying Features:

- H1110. Sandbanks which are slightly covered by sea water all the time
- H1130. Estuaries
- H1140. Mudflats and sandflats not covered by seawater at low tide; Intertidal mudflats and sandflats
- H1150. Coastal lagoons*
- H1210. Annual vegetation of drift lines
- H1220. Perennial vegetation of stony banks; Coastal shingle vegetation outside the reach of waves
- H1310. *Salicornia* and other annuals colonising mud and sand; Glasswort and other annuals colonising mud and sand
- H1320. *Spartina* swards (*Spartinion maritimae*); Cord-grass swards
- H1330. Atlantic salt meadows (*Glauco-Puccinellietalia maritimae*)



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H2120. Shifting dunes along the shoreline with *Ammophila arenaria* ("white dunes"); Shifting dunes with marram

S1016. *Vertigo moulinsiana*; Desmoulin's whorl snail

* denotes a priority natural habitat or species (supporting explanatory text on following page)